



State of Washington
PUBLIC DISCLOSURE COMMISSION

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December 24, 2024

Sent electronically to Conner Edwards at cg.edwards53@gmail.com

Subject: Complaint regarding PODPAC 115, PDC Case 159758

Dear Mr. Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 16, 2024. Your complaint alleged that PODPAC 115, a continuing committee registered with the PDC since August 2006 and participating in the 2024 election cycle, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file contribution and expenditure (C-4) reports during the accelerated reporting period.

To determine whether a formal investigation or enforcement action is warranted, PDC staff reviewed the allegations listed in the complaint; the applicable statutes and rule(s); the October 23, 2024, response provided by Soma Smith, Executive Director; the applicable PDC reports filed by PODPAC 115 (Committee); and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On June 4, 2023, the Committee filed its Committee Registration (C-1pc) as a continuing committee, selecting the "Full Reporting" option and listing Jeffrey Pentek and Soma Smith as Ministerial Treasurer and Manager, respectively.
- Staff noted that the Committee failed to timely file the 21- and 7-day pre-primary (C-4) reports. These reports were due no later than July 16, and July 30, 2024, respectively, and were filed 101 days and 87 days late on October 25, 2024.
- Staff also noted that the Committee failed to timely file the post-primary C-4 report. The post-primary C-4 report was due no later than September 10, 2024, and was filed 45 days late on October 25, 2024.
- Staff further noted that the Committee failed to timely file the 21-day pre-general C-4 report. The 21-day pre-general C-4 report was due no later than October 15, 2024, and was filed 10 days late on October 25, 2024.

- On October 25, 2024, the Committee amended/filed four C-4 reports, and one C-3 report. The Committee also filed one more C-4 report on November 6, 2024, to better reflect its expenditures in the 2024 election year.

Based on these findings, the staff has determined that, in this instance, the Committee's failure to timely file the required statutory C-4 reports during the accelerated reporting period, does not amount to a violation warranting further investigation. The Committee took responsibility for the error by responding to the complaint in a timely manner and filing the required reports as soon as they were notified of the complaint.

However, pursuant to WAC 390-37-060(1)(d), PODPAC 115 will receive a formal written warning concerning its failure to file timely C-4 reports during the accelerated reporting period, as required by law. PODPAC 115 officers will be informed the Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Accordingly, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Erick Agina, Compliance Officer, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Erick O. Agina, Compliance Officer

s/ _____
Peter Frey Lavalley, Executive Director

cc: PODPAC 115

