



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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February 6, 2025

Delivered electronically to Thomas Beben tom@bebenformasoncounty.com

Subject: PDC Case 159769 regarding Thomas Beben

Thomas Beben:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on September 13, 2024. The complaint alleged violations of RCW 42.17A.235, .240 for failure to timely and accurately disclose contributions & expenditures on reports.

Applicable Laws & Rules

- [RCW 42.17A.235](#) describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions.
- [RCW 42.17A.240](#) requires committees to file accurate campaign finance reports with the Public Disclosure Commission.

Background & Findings

- Thomas Beben (The Respondent) was a candidate for Mason County Commissioner in election year 2024 under the full report option.
- The Respondent failed to timely file two C-3 report and failed to report complete expenditure details on the C-4 covering May 1, 2024 through May 31, 2024.
- Additionally The Respondent used campaign funds to purchase tickets to the Kennedy Dinner, which is an impermissible use of campaign funds.
- On October 3, 2024, the Respondent amended their May C-4 to report the missing expenditure details.
- On January 10, 2024, The Respondent submitted a Miscellaneous Receipt C-3 reporting the deposit of \$250 from the candidate's personal funds to reimburse the campaign for the Kennedy Dinner tickets.

Summary and Resolution

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purposes of this chapter. Under WAC 390-37-060, the executive director, at any time prior to consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted.

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning failure to timely and accurately disclosure of all contribution and expenditures. The formal written warning will include staff's expectation that you timely and accurately disclosure of all contribution and expenditures. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

Any allegations regarding reporting by you for the election year 2024 that are not otherwise addressed are hereby dismissed.

If you have questions, you may contact Jordan Campbell at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed by Jordan Campbell
Jordan Campbell
Compliance Coordinator

Endorsed by,

Electronically signed by Peter Frey Lavallee
For Peter Frey Lavallee
Executive Director

cc: Conner Edwards