



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

December 18, 2024

Delivered electronically to Washington Denturist Political Action Committee, Crystal VanderYacht, at crystal@nwdental.org

Subject: Complaint filed by Conner Edwards, PDC Case 159774

Dear Crystal VanderYacht:

Below is a copy of an electronic letter sent to Conner Edwards concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Edwards, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Edwards. Staff expects you to timely file all required reports of contributions and expenditures in future years. The Commission will consider this 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 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 Tanya Mercier, Compliance Officer, by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Electronically Signed

Tanya Mercier

Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavalley

Executive Director



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

December 18, 2024

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

Subject: Complaint regarding Washington Denturist Political Action Committee, PDC Case 159774

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 16, 2024. The complaint alleged that the Washington Denturist Political Action Committee, a political committee, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file *Cash Receipts Monetary Contributions* (C-3) reports and *Campaign Summary Receipts & Expenditures* (C-4) reports, disclosing contributions and expenditures undertaken by the campaign.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the response(s) provided by the Washington Denturist Political Action Committee (the “Respondent”); the applicable PDC reports filed by the Respondent; and other relevant information; to determine whether the record supports a finding of one or more violations.

Background & Findings

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

- The Respondent registered as a political committee with the PDC in 2010 with the most recent amended Political Committee Registration (C-1pc) submitted on February 8, 2021. The Respondent registered as a Continuing Committee under the Full Reporting option. The committee Manager and Treasurer is Crystal VanderYacht.
- The Respondent filed Receipts & Expenditure Summary (C-4) reports showing aggregate sums for expenditures in months throughout 2022 but did not itemize the expenditures. This error occurred when the Respondent filed the C-4 reports early, before they entered the itemized monetary expenditures for each month, and then failed to submit the additional expenditures amending the original report. After receiving the complaint, the Respondent worked with PDC staff to correct the reporting errors. The original reported expenditures for 2022 were \$1,036 and once corrected on November 21, 2024, the total increased to \$12,036 mostly in contributions made to candidates in the 2022 election. The expenditures to candidates in 2022 were reported by the candidates, as contributions, on their Cash Receipts, Monetary Contributions (C-3) reports.

- On November 7, 2023, the Respondent made \$500 contributions to the House Democratic Campaign Committee, Senate Republican Campaign Committee, and the Washington Senate Democratic Campaign Committee. Reports in 2023 were also filed early and then not amended to reflect itemized expenditures. The original reported expenditures for 2023 were \$30 and once corrected on November 19, 2024, the total increased to \$1,533. The expenditures made to the committees in 2023 were reported by the committees, as contributions, on their C-3 reports.
- In 2024, Jessica Bateman reported, on a C-3 report, a \$500 contribution from the Respondent. PDC staff determined the contribution made to Ms. Bateman's Senate campaign was the result of surplus funds transferred from her House campaign. The transfer was with permission from the Respondent. The original contribution, from the Respondent, occurred in 2022 and was reported by the candidate on a C-3 report. The expenditure by the Respondent was reported on November 21, 2024, on amended C-4 #110260875.
- In 2024, Kevin Van De Wege reported, on a C-3 report, a \$500 contribution from the Respondent. PDC staff determined the contribution made to Mr. Van De Wege's Public Lands Commissioner campaign was the result of surplus funds transferred his Senate campaign. The transfer was with permission from the Respondent. The original contribution, from the Respondent, occurred in 2020 and was reported by the candidate on a C-3 report. The expenditure by the Respondent was also reported in 2020 on C-4 #110003702.
- A mitigating factor in this case is that all the expenditures made by the Respondent were reported in the year received as a contribution by the recipients.
- The Respondent does not have previous warnings or violations of PDC requirements.

Summary and Resolution

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, the Washington Denturist Political Action Committee will receive a formal written warning concerning their failure to timely disclose all contributions and expenditures. The formal written warning will include staff's expectation that the Washington Denturist Political Action Committee timely file all future required reports of contributions 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.

If you have questions, you may contact Tanya Mercier, Compliance Officer by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed
Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed
Peter Frey Lavalley
Executive Director

cc: Washington Denturist Political Action Committee