



**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

January 17, 2025

Delivered electronically to Washington Optometric Physicians Political Action Committee (WOPAC) at wopac@eyes.org

Subject: Complaint filed by Conner Edwards, PDC Case 159776

Dear Sarah Storrs, WOPAC Chair:

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.

WOPAC completed a Statement of Understanding (SOU) and paid a \$300 civil penalty in accordance with [WAC 390-37-143](#) (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely and accurately file Cash Receipts, Monetary Contributions (C-3) reports and Receipts & Expenditure Summary (C-4) reports in the years 2020, 2021, 2022, 2023, and 2024. The \$300 penalty assessed resolves the allegations listed in the complaint.

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



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January 17, 2025

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

Subject: Complaint regarding Washington Optometric Physicians Political Action Committee (WOPAC), PDC Case 159776

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed starting on August 16, 2024. The complaints alleged that WOPAC, a continuing committee under the Full Reporting option, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately file *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports), disclosing contributions and expenditures in the 2024 election and that there was a Cash on Hand balance irregularity between the ending 2022 and starting 2023 C-4 reports.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the response(s) provided by WOPAC (the "Respondent"); the applicable PDC reports filed by the Respondent; the Respondent's data in the PDC contribution and expenditure database; and other relevant information, to determine whether the record supports a finding of one or more violations.

Applicable Laws & Rules

Under RCW 42.17A.235 and .240, under the Full Reporting option, a committee is required to disclose contribution and expenditure information by submitting Receipts and Expenditure Summary (C-4) reports and Cash Receipts, Monetary Contributions (C-3) reports to the PDC. The Committee's due dates for the C-3 and C-4 reports are determined by its activity and participation in the election cycle.

Background & Findings

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

- The Committee filed a Committee Registration (C-1pc) on January 1, 2012, under the Full Reporting option, as a continuing committee.

- In 2020 and 2021 the Committee did not show a consistent record of timely reporting. However, in 2022, the Committee came into substantial compliance with its C-3 and C-4 reporting requirements for 2020 and 2021.
- The first C-4 report filed by the Committee in 2022 did not show the correct carry-forward balance from the 2021 calendar year, which caused errors throughout the 2022 reporting and resulted in a negative Cash on Hand balance on the last C-4 report filed in 2022. On December 5, 2024, the Committee fixed the errors in the 2022 reporting by amending multiple C-4 reports. Similarly, for 2023 and 2024, C-4 reports were amended to reflect correct carry-forward balances.
- In 2022, the Committee filed its January C-4 report two months late, and its February C-4 report was five days late.
- On April 11, 2023, the Committee filed a combined January – April C-4 report showing a level of contribution activity requiring separate months’ filings. This reporting method effectively made the January and February reports untimely. Additionally, the Committee filed its report for the period of April 18 – 30, 2023 one month late and filed its report for the period of July 12 – 24, 2023 one month late.
- In 2024, the Committee filed its C-4 reports for January, June, and August one month late.
- In 2021, 2022, and 2024 the Committee participated in the elections, by contributing to campaigns, but failed to comply with the C-4 reporting schedule requiring filing 21 days and 7 days before an election. The Committee also failed to comply with the C-4 post-election reporting period. The Committee also did not convert from monthly reporting to the required weekly C-3 reporting when there was applicable contribution activity.
- Late reporting and incorrect information submitted across years deprived the public of accurate information prior to elections in which the Committee participated.
- The Respondent does not have previous warnings or violations of PDC requirements.

Summary and Resolution

WOPAC worked timely and effectively with PDC staff to address reporting issues. In their response to the complaint, the WOPAC Chair said the organization “is a small PAC affiliated with Optometry’s professional organization in Washington State, (Optometric Physicians of Washington). It is run mostly by volunteers who are optometrists (with full time jobs). Check writing, distribution, and reporting are done by different individuals. We make every attempt to communicate efficiently and be timely with our reporting. We will do better in the future.”

WOPAC completed a Statement of Understanding (SOU) and paid a \$300 civil penalty in accordance with [WAC 390-37-143](#) (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely and accurately file Cash Receipts, Monetary Contributions (C-3) reports and Receipts & Expenditure Summary (C-4) reports in the years 2020, 2021, 2022, 2023 and 2024. The \$300 penalty assessed resolves the allegations listed in your complaints.

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@pdc.wa.gov.

Sincerely,

/s/ Electronically Signed
Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically Signed Peter Frey Lavalley
Executive Director

cc: Sarah Storrs, WOPAC Chair