



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

March 6, 2025

Delivered electronically to N. Smith Hagopian at smittyforjudge@gmail.com

Subject: Complaints filed by Conner Edwards, PDC Case 160576

Dear Smitty Hagopian:

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\(1\)](#)

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to comply with requirements of the PDC as noted in the enclosed letter sent to Mr. Edwards. Staff expect you to follow all elements of RCW 42.17A. 235, RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-043 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.

Also, you completed a Statement of Understanding (SOU) acknowledging a violation of RCW 42.17A.555 for use of public agency resources to assist your 2024 election campaign. By signing the SOU acknowledging the violation, this resolves the allegation of a violation specific to RCW 42.17A.555.

Based on this information, the PDC finds that no further action is warranted and has dismissed these matters in accordance with RCW 42.17A.755(1). As well, any allegations regarding reporting by you for calendar year 2024 that are not otherwise addressed are also hereby dismissed.

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

Sincerely,
/s/ Electronically signed
Tanya Mercier
Compliance Officer

Endorsed by,
/s/ Electronically signed
Peter Frey Lavallee
Executive Director



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March 6, 2025

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

Subject: Complaint regarding N. Smith Hagopian, PDC Case 160576

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 3, 2024. The complaint alleged that N. Smith Hagopian, a candidate in the 2024 election, may have violated RCW 42.17A.235 and .240, WAC 390-16-037, and WAC 390-16-043 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 undertaken by the campaign, and by not providing an inspection of the campaign books of account. As well, you alleged a violation of RCW 42.17A.555 for public use of agency resources to assist an election campaign.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the response(s) provided by Mr. Hagopian (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.

Applicable Laws & Rules

1. Per [RCW 42.17A.235](#) and [.240](#) under the Full Reporting option, a committee is required to disclose contribution and expenditure information by submitting C-4 reports and 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.
 - a. [WAC 390-16-037](#) directs campaigns on how to report the detail of an expenditure for goods and/or services.
2. RCW 42.17A.235 also states, in part, “the treasurer or candidate shall preserve the books of account, bills, receipts, and all other financial records of the campaign.” [WAC 390-16-043](#) defines “books of account” as “a ledger or similar listing of contributions, expenditures, and debts” and the books of account include: “a ledger, spreadsheet, or similar listing of contributions, expenditures, loans, debts and obligations to substantiate the information disclosed on the PDC campaign finance reports.”

The format of the “books of account” is not mandated by statute or WAC, but the expectation is that the information is accurate and thorough to substantiate the required reporting to the Commission. As well, it is not expected that a committee maintains records not provided by a financial institution, for example cancelled checks. However, the committee should maintain copies of received contribution checks and other source documents outlined in WAC 390-16-043.

3. As well, RCW 42.17A.235 and WAC 390-16-043 further inform the responsibility and process by which a committee must provide a books of account inspection.
4. [RCW 42.17A.555](#) reads, in part, “no elective official nor any employee of his or her office nor any person appointed to or employed by any public office or agency may use or authorize the use of any of the facilities of a public office or agency, directly or indirectly, for the purpose of assisting a campaign for election.

Background & Findings

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

- The Respondent registered with the PDC on May 1, 2024, under the Full Reporting option, as a candidate in the 2024 election for Superior Court Judge, Position 1, for Ferry, Pend Oreille, and Stevens Counties. They declared their candidacy with the WA Secretary of State’s office on May 9, 2024. The Respondent did not win election to office on November 5, 2024.
- During the investigation, the Respondent said that they kept receipts for expenditures, used a campaign specific credit card, and did not have a campaign specific bank account. Based on staff’s review, the Respondent did not keep thorough campaign books of account, and we have determined that there is evidence indicating the record keeping by the Respondent led to inaccurate and untimely reporting of contributions and expenditures.
- Case specifics of the reporting include:
 - In total, the Candidate reports \$31,743.09 in-kind and cash contributions. Of this amount, \$500 is attributable to in-kind contributions from a single contributor with the rest of the receipts coming from the candidate.
 - The first report submitted by the committee was a C-3 report, for the period of May 17, 2024, and it was filed approximately two months late on August 15, 2024.
 - On June 12, 2024, the campaign submitted the first C-4 report timely, for the period May 1, 2024 – May 31, 2024. The report was amended many times and finalized on March 2, 2025.
 - Starting June 3, 2024, the required filing of weekly C-3 reports began. The committee’s C-3 reports for deposits in June, July, August, September, and October were not submitted until October 29, 2024, amended February 4, 2025. The C-3 report for the period of October 29, 2024, was filed timely but the rest were filed between one week and four months late.

- The Respondent was not on the Primary Election ballot allowing them to continue monthly reporting on the C-4 report for June, July, and August.
 - The C-4 report for the period of June 1, 2024 – June 30, 2024, was due by the 10th of the following month. This report was originally submitted on October 27, 2024, amended many times, with the final report filed March 02, 2025.
 - For July and August, a C-4 report was due by the 10th of each of the following months. C-4 reports, for either month, were not filed until October 30, 2024, and finalized March 2, 2025.
 - The Respondent was on the General Election ballot.
 - A 21-day C-4 report, for the period September 1, 2024, to October 14, 2024, was due on October 15, 2025.
 - A 7-day C-4 report, for the period October 15, 2024, to October 28, 2024, was due on October 29, 2024.
 - A post-general C-4 report, for the period October 29, 2024, through November 30, 2024, was due on December 10, 2024.
 - The Respondent submitted a combined C-4 report for the period of July 1, 2024 – November 30, 2024, on October 30, 2024, amended many times, and finalized on March 2, 2025.
 - The C-4 report for the period of December 1, 2024, to December 31, 2024, was due by January 10, 2025. The report was originally submitted on December 7, 2024, amended many times, and finalized on March 2, 2025.
 - Throughout the reporting, there was a pattern of missing details specific to the purpose of an expenditure as is outlined in WAC 390-16-037. With the final submission of amended reports, the Respondent has to the best of their ability provided the purpose of expenditures.
- On October 26, 2024, you emailed the Respondent at their campaign email address of record requesting a campaign books of account inspection. On October 27, 2024, the Respondent replied that they would make their books of account available digitally. Over the course of the next week the Respondent tried to provide their records to you, but each attempt did not satisfy the requirements of WAC 390-16-043. PDC staff confirmed with you that some records were received, but not all records requested were provided. In this instance, the Respondent did not provide sufficient campaign books of account inspection.
 - On October 30, 2024, while responding to you with materials for the campaign books of account inspection, the Respondent used their public agency email on three separate occasions throughout the day. In this instance, the Respondent violated RCW 42.17A.555 by using public facilities to assist an election campaign.
 - The Respondent is employed as a Steven's County Prosecutor. On November 5, 2024, a picture was taken of the Respondent's personal vehicle, and it showed campaign signs in support of the Respondent's 2024 campaign in the front window of the vehicle. The vehicle was parked in a stall on a public street next to the Steven's County courthouse. The parking stall is not

designated specifically for employees and is open for use by the public. The personal vehicle nor the public parking stall are public facilities as defined in RCW 42.17A.555. This allegation is dismissed with no evidence of a violation.

- During the investigation, PDC staff found that on three occasions, outlined below, the Respondent reported expenditures for non-campaign specific activity.
 - On July 16, 2024, the Respondent reported an expenditure of \$70.00 for an entry fee to the 17th annual Opie-Cox Golf Tournament. The Respondent originally intended to attend but was recovering from a medical emergency and was not able to go. The \$70.00 was donated to the event to support the charity fundraiser.
 - On July 27, 2024, the Respondent reported an expenditure of \$50.00 for the purpose of buying raffle tickets from the Masonic Lodge for a children's football and cheerleader fundraiser. On the same day an expenditure to the Selkirk Trailblazers, for \$10.00, was reported for a fundraiser t-shirt.

In this instance, because the campaign was self-funded by the candidate, these issues are dismissed.

- The Respondent has no other Warnings or violations of PDC requirements.

Summary and Resolution

During the investigation the Respondent disclosed that they experienced multiple medical emergencies that affected their reporting capabilities. The Respondent was very cooperative with PDC staff and said, "I know the violations were no else's fault. They are mine. I hope that the additions I have made to the disclosures are adequate for the public to see that I have not violated anyone's trust or stolen or misused anyone's money – myself excepted."

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), N. Smith Hagopian will receive a formal written warning concerning their failure to comply with all elements of PDC requirements for RCW 42.17A. 235, RCW 42.17A.240, WAC 390-16-037, and WAC 390-16-043. The formal written warning will include the staff's expectation that Mr. Hagopian follow all reporting requirements and books of account requirements in the future. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Mr. Hagopian also completed a Statement of Understanding (SOU), acknowledging a violation of RCW 42.17A.555 by using public agency resources to assist his 2024 election campaign. By signing the SOU acknowledging the violation, this resolves the allegation of a violation specific to RCW 42.17A.555.

Based on this information, the PDC finds that no further action is warranted and has dismissed these matters in accordance with RCW 42.17A.755(1). As well, any allegations regarding reporting by you for calendar year 2024 that are not otherwise addressed are also hereby dismissed.

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: N. Smith Hagopian