



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)**

February 4, 2025

Delivered electronically to pud2024boballen@gmail.com.

Subject: Complaint filed by Conner Edwards, PDC Case 160579

Dear Robert Allen,

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 Conner Edwards, the PDC has dismissed this matter in accordance with WAC 390-37-060 and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

If you have questions, you may contact Colin Peeples at 1-360-753-1111 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Electronically signed by Colin Peeples

Colin Peeples  
Compliance Coordinator

Endorsed by,

Electronically signed by Kim Bradford

Kim Bradford  
Deputy Director  
For 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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

February 4, 2025

Delivered electronically to [cg.edwards53@gmail.com](mailto:cg.edwards53@gmail.com)

Subject: Complaint regarding Robert Allen, PDC Case 160579

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 7, 2024. The complaint alleged that:

- Violations of RCW 42.17A.235 & .240 for failure to timely file required expenditure (C-4) Reports.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; 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.

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

- Required reports were filed prior the election, and any late-reported activity did not materially harm the public interest beyond the harm to the policy of Chapter 42.17A RCW inherent in any violation.
- The Respondent lost in the general election.

Any violation that may have occurred does not constitute a material violation because it was inadvertent and minor, or has been cured, and, after consideration of all 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.

Furthermore, any allegations regarding reporting by you for the 2024 campaign that are not otherwise addressed are hereby dismissed.

If you have questions, you may contact Colin Peebles at 1-360-753-1111 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically signed Colin Peeples*

Colin Peeples  
Compliance Coordinator

Endorsed by,

*Electronically signed Kim Bradford*

Kim Bradford  
Deputy Director  
For Peter Frey Lavallee  
Executive Director

cc: Robert Allen