



**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

February 10, 2025

Delivered electronically to david@dwmac.com.

Subject: Complaint filed by Conner Edwards, PDC Case 160941

Dear David McClain:

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 [RCW 42.17A.755\(1\)](#).

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, this serves as a formal written warning concerning a failure to timely and accurately disclosure 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 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 Colin Peeples at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed Colin Peeples
Colin Peeples
Compliance Coordinator

Endorsed by,

Electronically signed Peter Frey Lavalley
Peter Frey Lavalley
Executive Director



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February 10, 2025

Delivered electronically to cg.edwards53@gmail.com.

Subject: Complaint regarding David McClain, PDC Case 160941

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on October 17, 2024, and December 11, 2024. The complaint alleged that David McClain may have violated RCW 42.17A.235 and .240 for failure 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.

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

- 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.
- WAC 390-16-037 includes directions on disclosing expenditures made for certain types of political advertisements and includes an example of the expected detail.

Background & Findings

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

- The Respondent was a candidate in the 2024 general election, selecting the Full Reporting Option.

- The Complaints alleged failure to timely file C-4 (expenditure) Reports and failure to include required expenditure detail.
- The Respondent was a first-time candidate with an entirely self-funded campaign, and was within the mini filing requirements.
- The Respondent filed multiple late C-4 reports with minimal activity and lost the general election.
- Once contacted the Respondent amended their reports to include required expenditure detail.

Summary and Resolution

Based on our findings, staff has determined that, in this instance, the failure to timely and accurately report expenditures does not amount to a violation that warrants further investigation. David McClain is a first-time candidate and responded to the complaint by making the required amendments.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, David McClain will receive a formal written warning concerning a failure to timely and accurately disclosure 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 finds that no further action is warranted and has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

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 Peeples at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed Colin Peeples
Colin Peeples
Compliance Coordinator

Endorsed by,

Electronically signed Peter Frey Lavalley
Peter Frey Lavalley
Executive Director

cc: David McClain