

|   |
|---|
| <b>Respondent Name</b>  |
| UFCW Union Local 367 Political Action Committee Fund (UFCW UNION LOCAL 367)   |
| <b>Complainant Name</b>   |
| Conner Edwards  |
| <b>Complaint Description</b>  |
| <p><a href="#">Conner Edwards</a> reported via the portal<br/>(Wed, 16 Oct 2024 at 4:31 PM)</p> <p><b>Description of Complaint</b></p> <p>See attached complaint.</p> <p><b>Notice to Respondent</b></p> <p>I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff with a so-called "warning letter".</p> <p>This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.</p> <p>What are these shortcomings?</p> <p>Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.</p> <p>I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.</p> <p>Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <a href="https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/">https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/</a></p> <p>If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.</p> <p>"Be the change that you wish to see in the world."<br/>— <b>Mahatma Gandhi</b></p> |
| <b>What impact does the alleged violation(s) have on the public?</b>  |
| See complaint. The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.   |
| <b>List of attached evidence or contact information where evidence may be found</b>   |
| See complaint and also PDC website.   |
| <b>List of potential witnesses with contact information to reach them</b>   |
| See complaint and also PDC website.   |
| <b>Certification (Complainant)</b>  |

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

# Key Dates: 2024

These dates are also found on the PDC's [Calendar of Events](#).

[Key dates for 2024 special elections are also available.](#)

|  |  |
|--|--|
| Within two weeks of organizing or becoming a candidate | Register the campaign. (Candidates also file an F-1.)  |
|  | NOTES: Committees organizing within three weeks of election must register within 3 business days of organizing. File an amended registration within 10 days of any changes.  |
| January 10   | File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Dec. 31   |
| February 12  | File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Jan. 31   |
| March 11   | File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Feb. 29   |
| April 10   | File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through March 31  |
| May 10   | File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through April 30  |
| May 6-10   | Declaration of candidacy filing week   |
| June 3   | Begin filing C-3 reports weekly, each Monday, for deposits made during previous 7 days (Monday through Sunday)   |
| June 10  | File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through May 31  |
| June 24  | Last day before primary election to change from mini to full reporting without special circumstances (See <a href="#">WAC 390-16-125</a> )   |
|  | 21-day pre-primary C-4. Candidates appearing on the primary election ballot file a C-4 that covers the period June 1 through July 15. So do committees supporting or opposing candidates.                                      |
| July 16  | Candidates not on the primary election ballot and committees only supporting or opposing general election ballot measures file monthly reports in June, July and August. These reports due on the 10th of the following month. |
| July 27 - August 5                                     | Campaign books open for public inspection  |
| July 30  | 7-day pre-primary C-4. Candidates appearing on the primary election ballot and committees participating in the primary file a C-4 that covers the period July 16 through July 29   |
| July 30 - August 5                                     | Special reports due if candidate or committee receives contributions of \$1,500 or more from a single source, or committee makes contributions of \$1,500 or more.   |
|  | NOTE: Does not constitute authority to exceed applicable local or state contribution limit   |
| AUGUST 6   | <b>PRIMARY ELECTION DAY</b>  |
| August 30  | Last day before general election to change from mini to full reporting without special circumstances (See <a href="#">WAC 390-16-125</a> )   |
|  | Post-primary C-4 due. Covers the period between July 30 and Aug. 31.   |
| September 10   | Candidates not on the primary election ballot and committees that did not participate in the primary file a report for the month of August   |
| October 15   | 21-day pre-general C-4 report due - report for the period Sept. 1 through Oct. 14.   |

|                            |   |
|----------------------------|---|
| October 15 -<br>November 4 | 1. Special reports due if a candidate or political committee receives contributions of \$1,500 or more from a single source, or if a political committee makes a contribution of \$1,500 or more.   |
|                            | 2. A candidate for statewide office may not accept contributions from a single source exceeding \$75,000 in the aggregate unless it is from the state committee of a bona fide major or minor political party.  |
|                            | 3. A candidate for another office or a political committee may not receive contributions from a single source exceeding \$7,500 in the aggregate unless it is from the state committee of a bona fide major or minor political party. The exception is ballot measure committees, which may receive larger contributions. |
| October 26 -<br>November 4 | Campaign books open for public inspection   |
| October 29                 | 7-day pre-general C-4 report due - report for the period Oct. 15 through Oct. 28.   |
| November 4                 | Last Monday that weekly C-3 reports must be filed for general election  |
| NOVEMBER 5                 | <b>GENERAL ELECTION DAY</b>   |
| December 10                | Post-general C-4 due that covers Oct. 29 through Nov. 30. File C-3s that have not been filed for any deposits made in November.   |
| January 10,<br>2025        | End of election cycle C-4 due that covers Dec. 1 through Dec. 31. File C-3s for any deposits made in December.  |

## Registration & Reporting Basics

[Candidate FAQ](#)

[Training and Resources](#)

[Political Committee FAQ](#)

### Registration & Reporting Basics

[Candidate Registration](#)

[Committee Registration](#)

[Choosing Mini or Full Reporting](#)

[Bank Accounts](#)

[Ending a Campaign Before the Election is Held](#)

### Key Dates: 2024

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## Loans

## 1/5

[Contributors and Vendors Map](#)

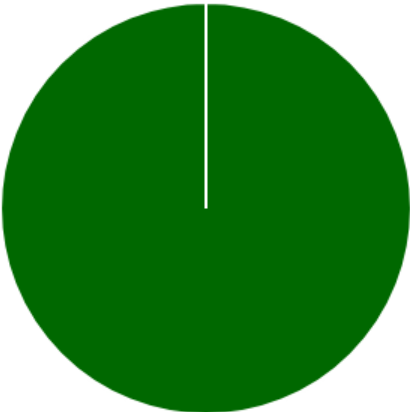
Made to committee for 2024

**Contributions**

See who has contributed cash and in-kind (non-monetary) contributions to the committee..

Contributions made to committee for 2024

Business  
\$87,492.94



Made by committee for 2024

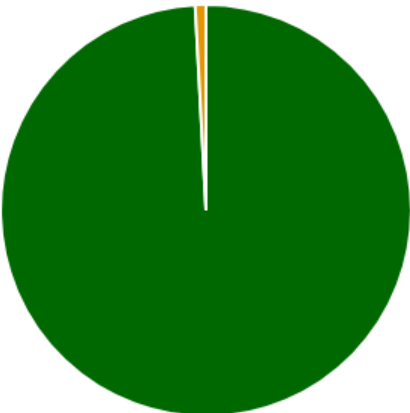
**Expenditures**

See how the committee has spent money, and what kind of goods and services it received as in-kind contributions.

Expenditures made by candidate for 2024

Monetary contributions to PAC...  
\$4,350.00

Not Provided  
\$36.84



Made to committee

Loans

See loans received, forgiven or paid by the campaign.

\$0.00

Held by committee

Debts

See the campaign's debt reporting history.

\$0.00

Campaign Finance Reports

See the reports filed by the committee. Reports with a strikethrough were amended by another report.

Show 50 entries

Download 26 rows as CSV.

| Period                             | Report Number                              | Filed      | Report                      | Form Type    | Election Year |
|------------------------------------|--|------------|-----------------------------|--------------|---------------|
| <del>09/01/2024 - 09/30/2024</del> | <del>110248860</del> Amended by: 110249029 | 10/03/2024 | <a href="#">View Report</a> | C4           | 2024          |
| 09/01/2024 - 09/30/2024            | 110249029                                  | 10/04/2024 | <a href="#">View Report</a> | C4 - Amended | 2024          |
| 08/05/2024 - 08/05/2024            | 110235903                                  | 08/05/2024 | <a href="#">View Report</a> | C3           | 2024          |
| <del>08/01/2024 - 08/31/2024</del> | <del>110247446</del> Amended by: 110249028 | 09/26/2024 | <a href="#">View Report</a> | C4           | 2024          |
| 08/01/2024 - 08/31/2024            | 110249028                                  | 10/04/2024 | <a href="#">View Report</a> | C4 - Amended | 2024          |
| 07/08/2024 - 07/08/2024            | 110228019                                  | 07/09/2024 | <a href="#">View Report</a> | C3           | 2024          |
| <del>07/01/2024 - 07/31/2024</del> | <del>110235904</del> Amended by: 110249027 | 08/05/2024 | <a href="#">View Report</a> | C4           | 2024          |
| 07/01/2024 - 07/31/2024            | 110249027                                  | 10/04/2024 | <a href="#">View Report</a> | C4 - Amended | 2024          |
| 06/04/2024 - 06/04/2024            | 110218797                                  | 06/04/2024 | <a href="#">View Report</a> | C3           | 2024          |
| <del>06/01/2024 - 06/30/2024</del> | <del>110228020</del> Amended by: 110249026 | 07/09/2024 | <a href="#">View Report</a> | C4           | 2024          |
| 06/01/2024 - 06/30/2024            | 110249026                                  | 10/04/2024 | <a href="#">View Report</a> | C4 - Amended | 2024          |
| 05/02/2024 - 05/02/2024            | 110211903                                  | 05/02/2024 | <a href="#">View Report</a> | C3           | 2024          |
| <del>05/01/2024 - 05/31/2024</del> | <del>110218798</del> Amended by: 110249025 | 06/04/2024 | <a href="#">View Report</a> | C4           | 2024          |
| 05/01/2024 - 05/31/2024            | 110249025                                  | 10/04/2024 | <a href="#">View Report</a> | C4 - Amended | 2024          |



| Period                             | Report Number                              | Filed      | Report                      | Form Type    | Election Year |
|------------------------------------|--|------------|-----------------------------|--------------|---------------|
| 04/03/2024 - 04/03/2024            | 110207328                                  | 04/03/2024 | <a href="#">View Report</a> | C3           | 2024          |
| <del>04/01/2024 - 04/30/2024</del> | <del>110211902</del> Amended by: 110249024 | 05/02/2024 | <a href="#">View Report</a> | C4           | 2024          |
| 04/01/2024 - 04/30/2024            | 110249024                                  | 10/04/2024 | <a href="#">View Report</a> | C4 - Amended | 2024          |
| 03/01/2024 - 03/01/2024            | 110202900                                  | 03/01/2024 | <a href="#">View Report</a> | C3           | 2024          |
| <del>03/01/2024 - 03/31/2024</del> | <del>110207327</del> Amended by: 110249023 | 04/03/2024 | <a href="#">View Report</a> | C4           | 2024          |
| 03/01/2024 - 03/31/2024            | 110249023                                  | 10/04/2024 | <a href="#">View Report</a> | C4 - Amended | 2024          |
| 02/05/2024 - 02/05/2024            | 110202899                                  | 03/01/2024 | <a href="#">View Report</a> | C3           | 2024          |
| <del>02/01/2024 - 02/29/2024</del> | <del>110202901</del> Amended by: 110249022 | 03/01/2024 | <a href="#">View Report</a> | C4           | 2024          |
| 02/01/2024 - 02/29/2024            | 110249022                                  | 10/04/2024 | <a href="#">View Report</a> | C4 - Amended | 2024          |
| 01/05/2024 - 01/05/2024            | 110195555                                  | 01/05/2024 | <a href="#">View Report</a> | C3           | 2024          |
| <del>01/01/2024 - 01/31/2024</del> | <del>110199852</del> Amended by: 110249021 | 02/05/2024 | <a href="#">View Report</a> | C4           | 2024          |
| 01/01/2024 - 01/31/2024            | 110249021                                  | 10/04/2024 | <a href="#">View Report</a> | C4 - Amended | 2024          |

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**Complaint Against:** WASHINGTON STATE MACHINISTS COUNCIL (MNPL), WA PHYSICAL THERAPY PAC, Voter Action, UFCW UNION LOCAL 367 POLITICAL ACTION COMMITTEE FUND (UFCW UNION LOCAL 367), PRO-CHOICE WASHINGTON PAC, King County Federation of Democratic Women (KCFDW), Kent Firefighters, IAFF Local 1747 PAC Sponsored by Kent Firefighters Local 1747, Duxwalup Leaders Sponsored by Tulalip Tribes of Washington, Children's Campaign Fund, AWSP-WASHINGTON SCHOOL PRINCIPALS LEGISLATIVE EFFECTIVENESS ASSOCIATION (AWSP-WSPLEA), Active in Democracy Tacoma Firefighters Union

**Submitted:** 10/16/24

**Notice to Respondent by:** 10/26/24 per WAC 390-37-050(1)

**90 Day Initial Hearing Deadline:** 1/14/25 per RCW 42.17A.755(3)

**Statutes Violated:** RCW 42.17A.235, .240

## **Background**

### **Washington State's Campaign Finance Disclosure Law**

One of the primary purposes of the public disclosure law is to provide citizens of this state, and especially voters, with the means for becoming informed about the financing of political campaigns.<sup>1</sup> The public disclosure law was enacted through voter approval of Initiative 276 in 1972.

State law requires candidates and committees that register under full reporting to submit regular reports of financial activity. Those reports are filed on schedules outlined on the PDC's key reporting dates calendar.<sup>2</sup>

When a political committee makes an expenditure benefitting a candidate appearing on the general election ballot or donates to a committee whose spending benefits a candidate appearing on the general election ballot, the committee becomes obligated to file reports on the same schedule that those candidates must follow.<sup>3</sup>

### **Reporting History of Multiple (11) Respondents**

In the last several weeks, I filed complaints against all of these respondents which demonstrated that they failed to submit the required C3/C4 reports that were due according to the reporting schedule they were obligated to follow because of their participation in the primary general election.

Despite the fact that the complaint I filed contained clear evidence that these respondents failed to file reports by the required deadlines, the agency staff dismissed these complaints with so-called "reminder" letters.

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<sup>1</sup> <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics>

<sup>2</sup> <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics/key-dates-2024>

<sup>3</sup> See RCW 42.17A.235(2) and RCW 42.17A.005(38)

The use of reminder letter dismissals (as opposed to warning letter dismissals) to dismiss complaints which accurately identify violations is a cynical misuse of the staff's enforcement powers.

Let me be clear: I don't believe that any of these filers intentionally failed to file the required reports by the appropriate deadline. However, regardless of their intent, the failure to file reports by the appropriate deadline is a violation.

PDC staff have long known that there is an issue with committees in our state filing reports on the appropriate schedule. Rather than admit the existence of this problem and work with stakeholders to come up with a solution that would solve this problem, the PDC staff have chosen to bury the problem under the rug with a mountain of "reminder" and "warning" letter dismissals.

This must change.

### **Violations**

The above referenced 11 respondents "participated" in the 2024 general election by virtue of the expenditures that they made. See URLs listed below and also RCW 42.17A.005(38). As such, these respondent committees were obligated to file C4 reports by the 10/15/24 deadline.

They failed to do so, despite having received reminder letters only a few weeks prior. See attached.

###

Report evidencing WASHINGTON STATE MACHINISTS COUNCIL (MNPL) participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110227927>

Report evidencing WA PHYSICAL THERAPY PAC participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110251085>

Report evidencing Voter Action participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110250618>

Report evidencing UFCW UNION LOCAL 367 POLITICAL ACTION COMMITTEE FUND (UFCW UNION LOCAL 367) participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110249024>

Report evidencing PRO-CHOICE WASHINGTON PAC participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110238279>

Report evidencing King County Federation of Democratic Women (KCFDW) participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110236842>

Report evidencing Kent Firefighters, IAFF Local 1747 PAC Sponsored by Kent Firefighters Local 1747 participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110247949>

Report evidencing Dxwlaip Leaders Sponsored by Tulalip Tribes of Washington participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110236148>

Report evidencing Children's Campaign Fund participation in general election:  
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110238242>

Report evidencing AWSP-WASHINGTON SCHOOL PRINCIPALS LEGISLATIVE EFFECTIVENESS ASSOCIATION (AWSP-WSPLEA) participation in general election:  
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110250675>

Report evidencing ACTIVE IN DEMOCRACY TACOMA FIREFIGHTERS UNION participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110235865>

###

## **Conclusion**

With the 2024 general election rapidly approaching, I urge the PDC staff to take quick action and resolve the noncompliance identified in this complaint.

Best,

/s/

Conner Edwards  
(425) 533-1677 cell

## **Notice to Respondent**

I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff with a so-called "warning letter".

This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.

What are these shortcomings?

Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.

I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.

Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/>

If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.

“Be the change that you wish to see in the world.”

— Mahatma Gandhi