



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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August 15, 2025

Delivered electronically to rhatch@tulaliptribes-nsn.gov and cg.edwards53@gmail.com

Subject: PDC Case 161358 regarding Dxwlalip Leaders Sponsored by Tulalip Tribes of Washington

Dear Dxwlalip Leaders Sponsored by Tulalip Tribes of Washington:

The Public Disclosure Commission (PDC) completed its review of the three complaints filed by Conner Edwards on October 16, 2024, November 1, 2024 and January 15, 2025 respectively. The complaints alleged violations of RCW 42.17A.235, .240 and .265 for failure to timely and accurately disclose contributions and expenditures on reports for election year 2024.

Specifically, these complaints alleged that Dxwlalip Leaders failed to timely file reports based on the accelerated reporting schedule for a 2024 election participant, including 21-day pre-General and 7-day pre-General C-4 reports, and timely disclose a \$30,000 Last Minute Contribution made prior to the 2024 Primary Election and a \$40,000 contribution received after the Primary Election.

Applicable Laws and Rules

- A committee that selects the Full Reporting option on their C-1pc report (*Political Committee Registration*) is required to disclose monetary and in-kind contributions and expenditures to the PDC on C-3 reports and C-4 reports pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the committee's election participation¹, and their financial activity.
 - For example, per RCW 42.17A.235, a committee may: 1) file C-4 reports on a monthly basis for months in which they received a contribution or made an expenditure if they are not participating in an election campaign; and 2) delay the filing of such monthly reports until they have either received contributions or made expenditures that exceed \$750².

¹ [RCW 42.17A.005\(38\)](#) defines "participate" to mean that, with respect to a particular election, an entity engages in one or more of the following activities: 1) makes a monetary or in-kind contribution to a candidate; 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate; or 3) engages in an activity described in .005(38)(c), (d) or (e). See also RCW 42.17A.005(21) & (30) for definitions of "electioneering communication" and "independent expenditure."

² Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

- Per [RCW 42.17A.235\(10\)](#), if there is no pending complaint about a C-3 or C-4 report being amended and it meets the conditions set forth in .235(10)(a) through (d), it is not evidence of a violation to submit an amended report within 21 days of the original report.
- Per [RCW 42.17A.265](#), the maker of a Last-Minute Contribution (LMC) of \$1,500³ or more (aggregate) within 7 days of a Primary Election and/or 21 days of a General Election is required to disclose it to the PDC and notify the recipient within 24 hours or the next business day. The submission of an LMC report or a C-4 report within 24 hours may satisfy the disclosure requirement for the maker of an LMC.

Background and Findings

- Dxwlalip Leaders Sponsored by Tulalip Tribes of Washington (the “Respondent”) first registered as a continuing committee with the PDC on October 15, 2021 and selected the Full Reporting option on their *Political Committee Registration* (C-1pc report). Their most recent amended C-1pc report was filed on June 19, 2025.
- On June 6, 2024, the Respondent amended a C-3 report disclosing a \$100,000 contribution received from their sponsor, Tulalip Tribes of Washington, to correct the received date from March 15, 2024 to June 5, 2024.
 - The delay in this amendment is mitigated by the following facts: 1) the contribution was accurately reported within 24 hours of the actual date received; and 2) the impact on the public was minimal because the Respondent did not participate in any 2024 elections.
- In election year 2024, the special reporting period for accelerated disclosure of Last-Minute Contributions (LMCs) made or received before the August 6th Primary Election was July 30, 2024 - August 5, 2024.
- On August 5, 2024, the Respondent timely filed a monthly C-4 report for July 2024 disclosing two monetary contributions of \$30,000 each made to Children’s Campaign Fund and a \$50,000 contribution made to Responsible Land Management PAC. The July C-4 report was amended once, on March 5, 2025, to remove the contributions to Children’s Campaign Fund (which occurred in August) and correct the date they paid Responsible Land Management PAC to July 26, 2024. The contribution to Responsible Land Management PAC was not made during the special reporting period so the LMC reporting deadline does not apply.
- The Respondent received a \$40,000 contribution from their sponsor, Tulalip Tribes of Washington, on August 8, 2024, which was required to be disclosed on a C-3 report by August 12, 2024. The report was filed with the PDC on January 10, 2025, making it 151 days late.
- On September 10, 2024, the Respondent timely filed a monthly C-4 report for August 2024. The August report was amended on March 5, 2025 to add the two monetary contributions of \$30,000 each the Respondent made to Children’s Campaign Fund. The \$40,000 contribution from the committee’s sponsor also appeared as a deposit in the amended report.

³ The threshold for expedited reporting of large, last-minute contributions was increased to \$1,500 effective June 30, 2022.

- The committee's C-4 reports for July and August of 2024 were amended on July 18, 2025, at the request of PDC staff, to correct the "Date Paid" for the two contributions made to Children's Campaign Fund to July 30, 2024⁴.
- The contributions made to Children's Campaign Fund fell within the special reporting period for LMCs and were not timely and accurately reported by the Respondent within 24 hours per the LMC reporting deadline.
 - On August 2, 2024, Children's Campaign Fund timely disclosed receipt of the two \$30,000 contributions from Dxwjalip Leaders on the Fund's LMC reports, which partially mitigates the Respondent's failure to disclose this information within the accelerated reporting deadline for LMCs.
- The Respondent timely filed a monthly C-4 report for September 2024 on October 10, 2024. No contributions were received or made during September.
- In election year 2024, the special reporting period for accelerated disclosure of last-minute contributions made or received before the November 5th General Election was October 15, 2024 - November 4, 2024.
- The Respondent timely filed a monthly C-4 report for October 2024 on November 11, 2024. No contributions were received or made during October.
- On January 13, 2025, the Respondent committee replied to the first two complaints by email and indicated they did not participate in any 2024 elections and were therefore not subject to the accelerated reporting schedule for election participants. The Respondent explained that their contributions to Children's Campaign Fund and Responsible Land Management PAC were made to support the general operations of those organizations and were not earmarked for any election or ballot measure. They said their C-4 report was submitted timely and the complaint should be dismissed.
- An Initial Hearing (Case Status Review) was held for this case on February 14, 2025.
- On February 27, 2025, the Respondent provided an email response to the third complaint and acknowledged that the C-3 report for the \$40,000 contribution, received on August 8, 2024, was filed late. They indicated that unique barriers related to the committee's bank account and Tulalip government laws and procedures, as well as a yearlong dormancy in 2023, led to lengthy delays in establishing operating procedures that comply with both PDC reporting schedules and Tulalip legal obligations. The committee indicated they continue to work on improving their workflows and turnaround times and their intention to be fully compliant in 2025.
- The Respondent was cooperative throughout the investigation.
- The Respondent has a previous warning/violation of PDC requirements for failure to timely and accurately report a contribution received in 2024 ([PDC Case 154195](#)).

⁴ The Respondent confirmed that checks were made out to Children's Campaign Fund on 7/30/24, which is the "Date Paid."

Summary and Resolution

Your committee was permitted to file monthly C-4 reports for 2024 due to a lack of election participation. As a result, the allegations made in the complaint regarding filing C-4 reports based on an accelerated reporting schedule, including the 21-day pre-General and 7-day pre-General C-4 reports, are hereby dismissed.

However, our findings indicate your committee failed to timely and accurately report two \$30,000 last-minute contributions (LMCs) made before the Primary Election and a \$40,000 contribution received after the Primary Election.

Noncompliance concerning the two LMCs is partially mitigated by the following factors: 1) the purpose of the contributions was to support general operations and not election-related activities; and 2) the recipient of the LMCs timely reported receiving them.

You completed a *Statement of Understanding* (SOU) and paid a \$150 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging a violation of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely report a \$40,000 contribution received in election year 2024. The \$150 penalty assessed resolves the allegation concerning this late-reported contribution.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), this also serves as a formal written warning concerning your failure to timely disclose Last-Minute Contributions made prior to an election. PDC staff expect you to timely disclose all Last-Minute Contributions in the future. The Commission will consider this 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 has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, you may contact Tabatha Blacksmith at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed by Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

cc: Conner Edwards