



**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 5, 2025

Delivered electronically to meridiancec@gmail.com

Subject: Complaint filed by Conner Edwards, PDC Case 161843

Dear Meridian Citizens for Education Committee:

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\(1\)](#) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to comply with the “mini reporting” limits. Staff expects you to strictly adhere to the contribution and expenditure limits while registered under “mini reporting” or to timely request to switch to the “full reporting” option and timely file all required reports of contributions and expenditures. 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 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 Casey Gayman at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Casey Gayman
Casey Gayman
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director



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February 5, 2025

Delivered electronically to cg.edwards53@gmail.com

Subject: Complaint regarding Meridian Citizens for Education Committee, PDC Case 161843

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 2, 2024. The complaint alleged that Meridian Citizens for Education Committee, a political committee, may have violated RCW 42.17A.235 and .240 and WAC 390-16-125 by accepting contributions in excess of the \$500 per donor aggregate amount, thereby exceeding the “mini reporting” limits without registering and timely filing Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the committee, under the “full reporting” option.

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

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

- On July 10, 2024, the Respondent submitted a Political Committee Registration (C-1 report), selecting the “mini reporting” option.
- [WAC 390-16-105](#) describes a campaign’s eligibility and restrictions when registering under the “mini reporting” option, specifically that no contribution or contributions from any person other than the candidate may exceed \$500 in the aggregate.
- [WAC 390-16-125](#) states in part that a candidate wishing to change from mini to full reporting must apply electronically to the PDC for authorization to change reporting options before the limitations specified in WAC 390-16-105 are exceeded.
- On October 1, 2024, the Respondent filed a C-3 report for a \$750 contribution from Tiger Construction, LTD. received on August 5, 2024.
- On October 15, 2024, the Respondent filed a C-3 report for a \$1,000 contribution from Dykeman, Inc. received on September 23, 2024.

- On October 15, 2024, the Respondent filed a C-3 report for a \$750 contribution from Meridian Booster Club received on October 2, 2024.
- In response to the complaint, treasurer Sara Bernardy described erroneously selecting the “mini reporting” option because it had been used for previous committees supporting Meridian School District bonds. She acknowledged that she did not fully understand the individual contribution limits, which resulted in accepting three over-limit contributions.
- Ms. Bernardy claimed she sought PDC assistance around the time of the committee registration by granting PDC access to the committee’s ORCA filing account, but did not realize she needed to contact the PDC directly to request assistance.
- Although it would not have been required to do so under the “mini reporting” option, the Respondent voluntarily filed before the election one C-4 report covering July 10, 2024 through October 14, 2024, and six C-3 reports disclosing all contributions received by the committee.
- On November 22, 2024, the Respondent filed two additional C-4 reports disclosing expenditures through November 30, 2024.
- Because the Respondent was notified of the complaint only after the general election, its options for refunding the overlimit contributions were limited. According to Ms. Bernardy and the committee’s latest C-4 report, the committee does not have sufficient funds to fully refund the over-limit portions of the three contributions that exceeded the \$500 per person limit.
- The Respondent does not have any previous violations of PDC requirements within the last five years.

Based on our findings, staff has determined that, in this instance, the acceptance of monetary contributions above the \$500 per donor aggregate limit while registered under the “mini reporting” option does not support a finding of a violation that warrants further investigation.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, Meridian Citizens for Education Committee will receive a formal written warning concerning its failure to comply with the “mini reporting” limits. The formal written warning will include staff’s expectation that Meridian Citizens for Education Committee strictly adhere to the contribution and expenditure limits while registered under mini reporting or to timely request to switch to the “full reporting” option and timely file all required reports of contributions and 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 Casey Gayman at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Casey Gayman
Casey Gayman
Compliance Officer

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