

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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

February 20, 2025

Delivered electronically to brettanddawn@live.com

Subject: PDC Case 161846

Volunteers for Issaquah Schools:

The Public Disclosure Commission (PDC) completed its review of the complaint filed Sept. 27, 2024 by Conner Edwards. The complaint alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately disclose contributions and expenditures on Cash Receipts Monetary Contributions (C-3) reports and Campaign Summary Receipts and Expenditures (C-4) reports, disclosing contributions and expenditures undertaken by the Volunteers for Issaquah Schools (Committee) during the 2022 and 2024 election years.

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 file accurate campaign finance reports with the Public Disclosure Commission.

Background & Findings

- The complaint noted the discrepancy between the ending balance for the 2022 Committee and the starting balance for the 2024 Committee.
- In response to the complaint, Committee treasurer Dawn Carr noted the Committee originally targeted the 2026 election and was filing reports between June 2022 and July 2024 under a 2026 Committee.
- When the Committee filed a 2024 registration, a number of reports did not transfer from the 2026 Committee to the 2024 Committee. Carr stated the beginning balance noted on the C-4 report filed August 11, 2024 matched the Committee's bank balance. In review of the Committee's filings, PDC staff noted the technical error and, working with the Committee, was able to transfer the reports.
- The complaint also alleged required expenditure detail was not provided for expenditures during the 2022 and 2024 campaigns. In response, detail was added to expenditures made during the

- 2024 campaign. Carr was unable to modify the 2022 campaign expenditures as they did not have access to the PDC reporting system.
- In reporting for its February 2025 campaign, the Committee was unable to file under a 2025 registration due to this technical error. PDC staff was able to transfer the Committee's February special election reports originally timely filed under the 2024 Committee to the 2025 Committee.

Summary and Resolution

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purpose 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.

Pursuant to WAC 390-37-060(1)(d), however, Volunteers for Issaquah Schools are receiving a formal written warning concerning failure to accurately disclosure contributions and expenditures. The formal written warning will include PDC staff's expectation Volunteers for Issaquah Schools timely and accurately files all future 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 guidance regarding current caseload levels the Commission issued at its January 23, 2025 meeting, this matter is being dismissed in accordance with RCW 42.17A.755(1).

Any allegations regarding reporting for calendar year 2024 and the February 2025 special election that are not otherwise addressed are hereby dismissed. However, failure to comply with PDC requirements in the future may lead to enhanced enforcement action.

If you have questions, contact Alice Fiman at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

Electronically signed by Alice Fiman
Alice Fiman
Compliance Officer

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee Executive Director

cc: Conner Edwards