

Respondent Name
Auburn Citizens for Schools
Complainant Name
Conner Edwards
Complaint Description
<p><u>Conner Edwards</u> reported via the portal (Mon, 14 Oct 2024 at 11:27 AM)</p> <p>Description of Complaint</p> <p>See attached complaint.</p> <p><u>Notice to Respondent</u></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Overcomplicated and outdated requirements that are difficult to understand and comply with.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: https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/</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.” — Mahatma Gandhi</p>
What impact does the alleged violation(s) have on the public?
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.
List of attached evidence or contact information where evidence may be found
See complaint and also PDC website.
List of potential witnesses with contact information to reach them

See complaint and also PDC website.

Certification (Complainant)

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 WAC 390-16-125)
	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	PRIMARY ELECTION DAY
August 30	Last day before general election to change from mini to full reporting without special circumstances (See WAC 390-16-125)
	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 - 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 - 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	GENERAL ELECTION DAY
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, 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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[Expenditures & Debts](#)

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October 13, 2020

Delivered electronically to Cari Manry on behalf of Auburn Citizens for Schools at
“auburncitizens4schools@gmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 73816

Dear Cari Manry:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Morgan, 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.

PDC staff is reminding Auburn Citizens for Schools (ACS) about the importance of the timely and accurate disclosure of all contribution and expenditure activities, including the carry forward balances and expenditure details when required. PDC staff expects in the future that ACS will file timely and accurate campaign reports in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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October 13, 2020

Delivered electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Complaint regarding Auburn Citizens for Schools, PDC Case 73816

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 15, 2020. The complaint alleged that Auburn Citizens for Schools (ACS), a political committee registered with the PDC in 2016 to support a bond and in 2020 to support a levy, may have violated: (1) RCW 42.17A.235 and .240 for failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing expenditures for election years 2016 & 2020; and (2) RCW 42.17A.235 and .240 for failure to timely and accurately report carry forward cash for election years 2016 & 2020.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the responses provided by committee president, Cari Manry, and committee treasurer, Margaret Keller, for ACS ("the Respondent"); the applicable PDC reports filed by the Respondent; and queried the Respondent's data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- On July 6, 2016, ACS filed a Committee Registration Statement (C-1pc report) registering for the November 8, 2016 general election, choosing the "Full Reporting" option and listing Kelly McDonald as Campaign Manager, Cari Manry and Alexis Rosario as co-chairs, Margaret Keller as Treasurer and Diane Jordan as Secretary. On March 4, 2020, ACS filed a C-1pc report registering for the February 8, 2020 special, choosing the "Full Reporting" option and listing Cari Manry as president and Margaret Keller as Treasurer.
- As a committee registered under the "Full Reporting" option, ACS was required to disclose contributions and expenditures for each election in which it was participating and to account for funds left over at the conclusion of a specific election to use as the beginning balance for a new election.
- The complaint included the allegation that the ending balance from the 2012 election did not match the beginning balance used for the 2016 election. Because the 2012 reports were outside of the statute of limitations for enforcement action, staff's review did not include this portion of the complaint.
- In her response, Ms. Keller stated that she was responsible for reporting ACS's activity for the 2016 election, that she is confident that the beginning balance of \$7,535.49 reported on the C-4 report covering June 1, 2016 to June 30, 2016 is correct, and that it reconciles with the bank balance.

- The complaint further alleges that the ending balance of \$4,480.44 reported on the C-4 report covering November 1, 2016 to November 30, 2016 submitted at the conclusion of the 2016 election was not brought forward to the beginning of the 2020 election.
- In response to the discrepancy in the carry forward from the end of 2016 to the beginning of 2020, ACS intended to submit a C-1pc choosing the “Mini Reporting” option in order to capture the limited activity between the two elections, however this was not technically possible with the PDC’s registration system. Ms. Keller stated that when the committee is not actively involved in a levy or bond, ACS has little to no financial activity and qualifies to use the “Mini Reporting” option. Ms. Keller confirmed that although the registration was not submitted timely, ACS received no more than \$500 from one source and did not raise or spend more than \$5,000.
- The complaint included allegations of late and incomplete reporting, specifically insufficient expenditure details as required by RCW 42.17A.240 and further described in WAC 390-16-037.
- In response, Cari Manry acknowledged the late and incomplete reporting and, as a result, a small number of amended C-4 reports were submitted to update expenditure details for 2016 and 2020.

It appears that the late and incomplete reporting was due to a general lack of knowledge with PDC laws, rules and reporting software, and not done to conceal the campaign activities of ACS. The committee has not been the subject of enforcement matters before the Commission and cooperated with staff to make the corrections referenced above.

As noted in the complaint, staff believes that the way ACS registered each election was partly to blame for the allegations related to the carry forward balances.

Based on our findings staff has determined that, in this instance, failure to timely and accurately file C-4 reports disclosing the campaign activities of ACS during election years 2016 & 2020, does not amount to a finding of a violation that warrants further investigation.

PDC staff is reminding ACS about the importance of the timely and accurate disclosure of all contribution and expenditure activities, including the carry forward balances and expenditure details when required, on all future PDC reports in accordance with the statutes and 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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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June 18, 2024

Delivered electronically to "auburncitizens4schools@gmail.com"

Subject: PDC Case 147904

Dear Auburn Citizens for Schools:

Enclosed 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 enclosed letter to Conner Edwards, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be taking further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this letter serves as a formal warning concerning ACS's failure to timely file its 21-day pre-election C-4 report and its failure to account for the committee's contribution and expenditure activities between the 2020 and 2024 special elections. Staff expects that Auburn Citizens for Schools will file all future required reports of contributions and expenditures in a timely manner. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,
Electronically Signed Philip E. Stutzman
Phil Stutzman
Compliance Officer

Endorsed by,
Electronically Signed Peter Frey Lavalley
Peter Frey Lavalley
Executive Director



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June 18, 2024

Delivered electronically to "cg.edwards53@gmail.com"

Subject: Complaint regarding Auburn Citizen for Schools (ACS) 2024, PDC Case 147904

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its investigation of the complaint you filed on January 24, 2024. Your complaint alleged that Auburn Citizens for Schools (ACS) 2024 may have violated RCW 42.17A.235 and .240 by failing to timely and accurately disclose contributions and expenditures on required C-3 and C-4 reports. Specifically, you alleged that as of 1/24/2024, the Respondent had not filed its 21-day pre-election C-4 report for the 2/13/2024 special election that was due 1/23/2024. In addition, on February 8, 2024, you asked staff to investigate whether C-3 reports of contributions were missing between the 2020 and 2024 elections based on your observation that the final C-4 report for the 2020 election, covering the period 7/1/2020 – 7/31/2020, had a Cash on Hand balance of \$10,005.54 and the first C-4 report for the 2024 election had a Cash on Hand balance of \$19,795.31.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Auburn Citizens for Schools (ACS) 2024; 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:

- Auburn Citizens for School describes itself as an all-volunteer organization that has been working in the Auburn community since 1985 to promote passage of Auburn School District bond and levy ballot measures. The organization states it is involved because state campaign and election laws prevent school districts from directly participating in an advocacy role in the bond and levy campaigns.
- ACS supported Propositions 1 and 2 on the 2/11/2020 ballot. ACS also supported Proposition 1 on the 2/13/2024 ballot. The district placed no ballot measures on the ballot in 2021, 2022, or 2023.
- In 2024, ACS filed its 21-day, pre-election C-4 report, covering the period 1/5-1/22/2024, on 1/28/2024. The report was due 1/23/2024, making the report with \$194 in contributions received and \$5,163.14 in expenditures, five days late. At the request of PDC staff, ACS amended its 21-day

pre-election C-4 report to include contributions and expenditures for the period 12/1/2023 - 1/22/2024.

- Also, at the request of PDC staff, ACS included additional detail for expenditures, including a more detailed description of the \$3,285.99 expenditure to Minuteman Press, to include the quantities purchased for each type of communication (e.g., the number of flyers, postcards, and doorhangers purchased). The \$824.30 expenditure to Spectrum Sign Company was amended to include the number of signs purchased and the \$945.00 expenditure to Sound Publishing was amended to include the run dates for the newspaper and periodical advertising.
- ACS timely filed its 7-day pre-election C-4 report covering the period 1/23/2024 - 2/5/2024.
- ACS also timely filed its post-election C-4 Report for the period 2/26/2024 – 2/29/2024.

Activity Between 2020 and 2024 Election Campaigns

- The final C-4 report for the 2020 election campaign covered the period 7/1/2020 – 7/31/2020. ACS attempted to register as a continuing committee following the 2020 election, hoping to be under the Mini Reporting Option as a continuing committee during the years between elections. However, PDC staff reverted (rejected) the registration and asked ACS to register as a single election committee, which allows each election to be tracked separately. For this to work well, single election committees need to register for the next election after filing the final report for the existing election, estimating when the next election will occur, and amending the registration when an exact date is known. On 1/5/2024, ACS registered as a single election committee for the 2/13/2024 special election, selecting the Full Reporting Option.
- ACS receives a few ongoing contributions from school district employees and incurs minor expenses between elections, such as an expense for its post office box rental. Depending on the level of expected contributions and expenditures, a single election committee may select the Mini Reporting Option or the Full Reporting Option. To account for its contribution and expenditure activity, ACS has filed C-3 and C-4 reports for the periods 8/1/2020 - 8/31/2020; 9/1/2020 – 9/30/2020; 10/1/2020 – 10/31/2020; 11/1/2020 – 11/30/2020; 12/1/2020 – 12/31/2022; 1/1/2023 – 10/31/2023; 11/1/2023 – 11/30/2023; 12/1/2023 – 1/22/2024 (21-day pre-election report); 1/23/2024 – 2/5/2024 (7-day pre-election report); and 2/6/2024 – 2/29/2024 (post-election report). The C-4 reports now account for all campaign activity from the close of the 2/11/2020 election to the close of the 2/13/2024 election.

Based on these findings, staff has determined that in this instance, filing its 21-day pre-election C-4 report for the 2/13/2024 special levy election five days late, and its failure to account for its contribution and expenditure activities between the 2020 and 2024 special elections when ACS mistakenly understood itself to be under the Mini Reporting Option, does not amount to a violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(d), Auburn Citizens for Schools (ACS) 2024 will receive a formal written warning concerning its failure to timely file its 21-day pre-election C-4 report and its failure to account for its contribution and expenditure activities between the 2020 and 2024 special elections. The formal written warning will include staff's expectation that Auburn Citizens for Schools will file all future required reports of contributions and expenditures in a timely manner. 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 Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,
Electronically Signed Philip E. Stutzman
Phil Stutzman
Compliance Officer

Endorsed by,
Electronically Signed Peter Frey Lavalley
Peter Frey Lavalley
Executive Director

cc: Auburn Citizen's for Schools (ACS) 2024

Auburn Citizen's for Schools (ACS) 2024

Overview

[Contributions](#)[Expenditures](#)[Pledges](#)[Debts](#)[Loans](#)

Committee Overview

Registered March 14, 2024
Single Election Committee
Treasurer is Maggie Keller

Committee Contact

PO Box 124
Auburn, WA 98071
✉ auburncitizens4schools@gmail.com

Financial Overview

\$13,892.49	+	\$4,677.70	+	\$0.00	=	\$18,570.19
Starting balance		Contributions		Loans		Total raised

\$6,906.46		\$0.00		\$0.00
Total spent		Pledges		Debt

Committee Reports and Forms

[Registration Form](#)
[Contributors and Vendors Map](#)

Made to committee for 2024

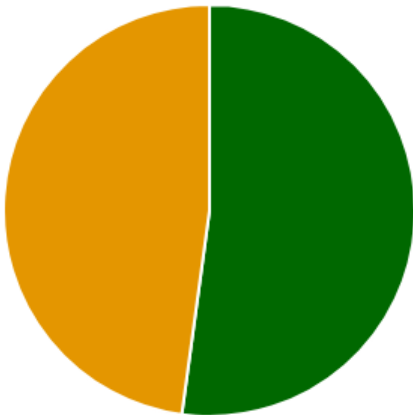
Contributions

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

Contributions made to committee for 2024

Individual
\$2,439.40

Other
\$2,238.30



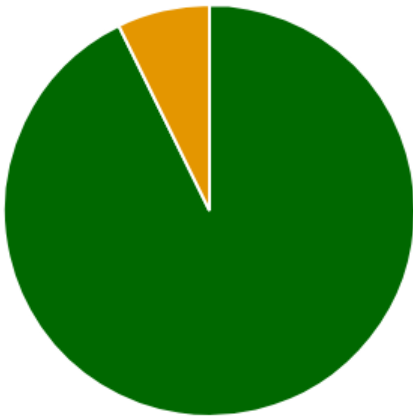
Made by committee for 2024
Expenditures

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

Campaign merchandise/paraphernalia
\$6,404.47

Not Provided
\$501.99



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

25

 entries

[Download 10 rows as CSV.](#)

Period	Report Number	Filed	Report	Form Type	Election Year
10/11/2024 - 10/11/2024	110251190	10/12/2024	View Report	C3	2024
10/03/2024 - 10/03/2024	110248966	10/03/2024	View Report	C3	2024
10/02/2024 - 10/02/2024	110248964	10/03/2024	View Report	C3	2024
09/27/2024 - 09/27/2024	110247593	09/27/2024	View Report	C3	2024
09/25/2024 - 09/25/2024	110247592	09/27/2024	View Report	C3	2024
09/16/2024 - 09/16/2024	110246003	09/17/2024	View Report	C3	2024
08/23/2024 - 08/23/2024	110240805	08/28/2024	View Report	C3	2024
07/18/2024 - 07/18/2024	110231203	07/18/2024	View Report	C3	2024
05/09/2024 - 05/09/2024	110215647	05/14/2024	View Report	C3	2024
03/14/2024 - 10/14/2024	110251439	10/13/2024	View Report	C4	2024

Showing 1 to 10 of 10 entries

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Auburn Citizen's for Schools (ACS) 2024

Overview

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Committee Overview

Registered January 5, 2024
Single Election Committee
Treasurer is Maggie Keller

Committee Contact

📍 P.O. Box 124
Auburn, WA 98071
✉ auburncitizens4schools@gmail.com
📞 206-915-6363

Financial Overview

\$10,969.37	+	\$10,460.94	+	\$0.00	=	\$21,430.31
Starting balance		Contributions		Loans		Total raised

\$7,114.37		\$0.00		\$0.00
Total spent		Pledges		Debt

Committee Reports and Forms

[Registration Form](#)[Contributors and Vendors Map](#)

Made to committee for 2024

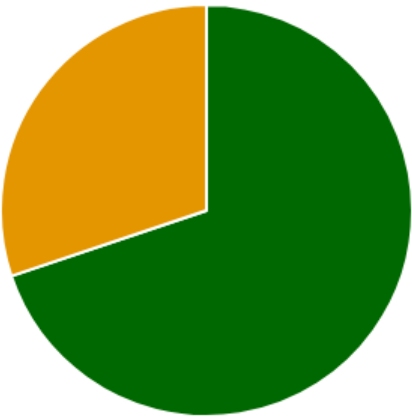
Contributions

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

Contributions made to committee for 2024

Other
\$7,305.94

Individual
\$3,155.00



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

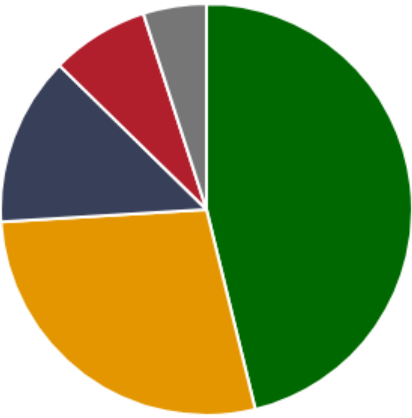
Printing literature, fliers,...
\$3,285.99

Campaign merchandise/paraphernalia
\$1,982.50

Newspaper/periodical advertising
\$945.00

Not Provided
\$547.88

Other
\$353.00



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 100 entries

Download 73 rows as CSV.

Period	Report Number	Filed	Report	Form Type	Election Year
02/06/2024 - 02/29/2024	110202921 Amended by: 110214065	03/01/2024	View Report	C4	2024
02/06/2024 - 02/29/2024	110214065 Amended by: 110214066	05/09/2024	View Report	C4 - Amended	2024
02/06/2024 - 02/29/2024	110214067	05/09/2024	View Report	C4 - Amended	2024
02/06/2024 - 02/29/2024	110214066 Amended by: 110214067	05/09/2024	View Report	C4 - Amended	2024
02/05/2024 - 02/05/2024	110199891	02/05/2024	View Report	C3	2024
01/23/2024 - 02/05/2024	110199900 Amended by: 110205656	02/05/2024	View Report	C4	2024
01/23/2024 - 02/05/2024	110205656 Amended by: 110214071	03/14/2024	View Report	C4 - Amended	2024
01/23/2024 - 02/05/2024	110214071 Amended by: 110214072	05/09/2024	View Report	C4 - Amended	2024
01/23/2024 - 02/05/2024	110214072	05/09/2024	View Report	C4 - Amended	2024
01/05/2024 - 01/05/2024	110198965	01/28/2024	View Report	C3	2024
01/05/2024 - 01/22/2024	110198966 Amended by: 110199896	01/28/2024	View Report	C4	2024
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Complaint Against: Auburn Citizens for Schools (ACS)

Submitted: 10/14/24

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

90 Day Initial Hearing Deadline: 1/12/25 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.¹ 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.²

Auburn Citizens for Schools (ACS)

Auburn Citizens for Schools (ACS) is a political committee registered to support ballot measures that appear on voters' ballots in the Auburn School District.

Reminder Letter issued in 2020

In 2020, a complaint was filed against ACS relating to late and inaccurate C4 reports filed by the committee. The PDC found that "the late and incomplete reporting was due to a general lack of knowledge with PDC laws, rules and reporting software" and dismissed the complaint with a "reminder" letter.³

Warning Letter Issue in 2024

In 2024, a complaint was filed against ACS relating to late and inaccurate C3 and C4 reports filed by the committee. The PDC found that the committee had failed to timely file the required reports. The PDC dismissed the complaint with a "warning" letter.⁴ The warning letter said, in part, that:

"[this] formal written warning will include staff's expectation that Auburn Citizens for Schools will file all future required reports of contributions and expenditures in a timely manner. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules."

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

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

³ <https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/73816>

⁴ <https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/147904>

Violations

As detailed below, the committee has now committed additional violations.

This committee is registered twice for 2024, presumably because they participated in two separate elections.

For the committee's first 2024 registration⁵, the committee filed a final C4 for the period covering February 2024, indicating an ending cash on hand balance of \$14,101.05.⁶

Yet, for the committee's second 2024 registration⁷, the committee filed an initial C4 for the period covering 3/14/24 to 10/14/24, indicating a starting cash on hand balance of \$13,892.49.⁸

This discrepancy indicates incomplete reporting for two reasons: a) because the cash balance does not match, and b) because there is a period from 3/1/24 to 3/13/24 where the committee has not disclosed financial activity.

Additionally, a C4 report⁹ that the committee filed on 10/13/24 covering the time period of 3/14/24 to 10/14/24 was filed significantly late.

Based on the activity disclosed in that report, a C4 report covering the time period of 3/1/24 to 7/31/24 should have been filed no later than 8/12/24, if not sooner. Yet, no report was filed by that time.

Based on the activity disclosed in that report, a C4 report covering the time period of 8/1/24 to 9/30/24 should have been filed no later than 10/10/24. Yet no report was filed by that time.

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

⁵ <https://pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2024-35192>

⁶ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110214067>

⁷ <https://pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2024-36018>

⁸ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110251439>

⁹ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110251439>

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**