

|   |
|---|
| <b>Respondent Name</b>  |
| MLK, JR. County Labor Council Comm on Political Education - 2024  |
| <b>Complainant Name</b>   |
| Conner Edwards  |
| <b>Complaint Description</b>  |
| <p><a href="#">Conner Edwards</a> reported via the portal<br/>(Fri, 11 Oct 2024 at 2:30 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Overcomplicated and outdated requirements that are difficult to understand and comply with.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>  |
| 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.

# MARTIN LUTHER KING, JR. COUNTY LABOR COUNCIL COMM ON POLITICAL EDUCATION 2024

## Overview

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

### Committee Overview

Registered November 19, 2006  
Continuing Committee (Union)  
Treasurer is KATIE GARROW

### Committee Contact

📍 5030 1st Ave S., Suite 301  
Seattle, WA 98134  
✉ [office@mlklabor.org](mailto:office@mlklabor.org)  
📞 2064418510

### Financial Overview

|                  |   |                   |   |               |   |                   |
|------------------|---|-------------------|---|---------------|---|-------------------|
| <b>\$100.00</b>  | + | <b>\$4,500.00</b> | + | <b>\$0.00</b> | = | <b>\$4,600.00</b> |
| Starting balance |   | Contributions     |   | Loans         |   | Total raised      |

|                   |  |               |  |               |
|-------------------|--|---------------|--|---------------|
| <b>\$4,350.00</b> |  | <b>\$0.00</b> |  | <b>\$0.00</b> |
| Total spent       |  | Pledges       |  | Debt          |

### Committee Reports and Forms

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

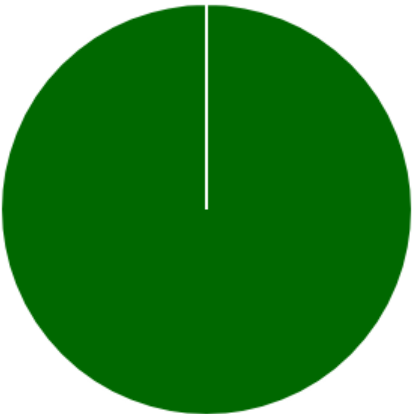
Made to committee for 2024

**Contributions**

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

Contributions made to committee for 2024

Other  
\$4,500.00



Made by committee for 2024

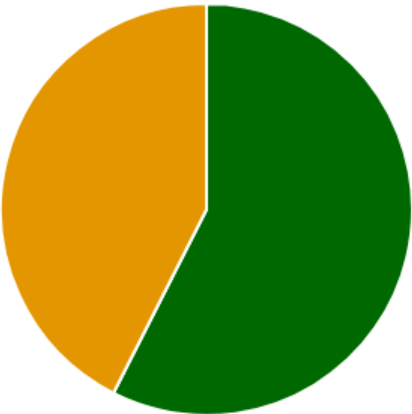
**Expenditures**

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

Other  
\$2,500.00

Monetary contributions to PAC...  
\$1,850.00



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 25 entries

Download 13 rows as CSV.

| Period                  | Report Number | Filed      | Report                      | Form Type | Election Year |
|-------------------------|---------------|------------|-----------------------------|-----------|---------------|
| 09/01/2024 - 09/01/2024 | 110249049     | 10/04/2024 | <a href="#">View Report</a> | C3        | 2024          |
| 09/01/2024 - 09/30/2024 | 110249053     | 10/04/2024 | <a href="#">View Report</a> | C4        | 2024          |
| 08/30/2024 - 08/30/2024 | 110249052     | 10/04/2024 | <a href="#">View Report</a> | C3        | 2024          |
| 08/01/2024 - 08/31/2024 | 110242062     | 09/03/2024 | <a href="#">View Report</a> | C4        | 2024          |
| 07/01/2024 - 07/31/2024 | 110239288     | 08/19/2024 | <a href="#">View Report</a> | C4        | 2024          |
| 06/01/2024 - 06/30/2024 | 110228065     | 07/09/2024 | <a href="#">View Report</a> | C4        | 2024          |
| 05/01/2024 - 05/31/2024 | 110221206     | 06/10/2024 | <a href="#">View Report</a> | C4        | 2024          |
| 04/01/2024 - 04/30/2024 | 110213728     | 05/09/2024 | <a href="#">View Report</a> | C4        | 2024          |
| 03/25/2024 - 03/25/2024 | 110207554     | 04/04/2024 | <a href="#">View Report</a> | C3        | 2024          |
| 03/01/2024 - 03/31/2024 | 110207557     | 04/04/2024 | <a href="#">View Report</a> | C4        | 2024          |
| 02/01/2024 - 02/29/2024 | 110203272     | 03/04/2024 | <a href="#">View Report</a> | C4        | 2024          |
| 01/19/2024 - 01/19/2024 | 110199853     | 02/05/2024 | <a href="#">View Report</a> | C3        | 2024          |
| 01/01/2024 - 01/31/2024 | 110199854     | 02/05/2024 | <a href="#">View Report</a> | C4        | 2024          |

Showing 1 to 13 of 13 entries

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SUMMARY, FULL REPORT RECEIPTS AND  
EXPENDITURES

C4

MARTIN LUTHER KING, JR. COUNTY LABOR COUNCIL COMM ON POLITICAL EDUCATION

5030 1st Ave S., Suite 301  
Seattle, WA 98134

Coverage: 08/01/2024 to 08/31/2024

Final report: No

Report number: 110242062

Reporting year: 2024

Date submitted: 09/03/2024

RECEIPTS

|   |        |            |
|---|--------|------------|
| 1. Previous total cash and in-kind contributions (last C4 line 8).          |        | \$2,600.00 |
| 2. Cash received (Schedule A line 1).                                       | \$0.00 |            |
| 3. In-kind contributions received (Line 1 schedule B).                      | \$0.00 |            |
| 4. Total cash and in-kind contributions received this period (Lines 2 + 3). |        | \$0.00     |
| 5. Loan principal repayments made (Line 2 schedule L).                      | \$0.00 |            |
| 6. Corrections (Lines 1 or 3 schedule C).                                   | \$0.00 |            |
| 7. Net adjustments this period (Lines 5 + 6).                               |        | \$0.00     |
| 8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).  |        | \$2,600.00 |
| 9. Total pledge payments due (Line 2 schedule B).                           | \$0.00 |            |

EXPENDITURES

|   |        |            |
|---|--------|------------|
| 10. Previous total cash and in-kind expenditures (Last C-4 line 17).          |        | \$2,500.00 |
| 11. Cash expenditures (Line 3 schedule A).                                    | \$0.00 |            |
| 12. In-kind expenditures (Line 1 schedule B).                                 | \$0.00 |            |
| 13. Total cash and in-kind expenditures made this period (Lines 11 + 12).     |        | \$0.00     |
| 14. Loan principal repayment made (Line 2 schedule L).                        | \$0.00 |            |
| 15. Corrections (Lines 2 + 3 schedule C).                                     | \$0.00 |            |
| 16. Net adjustments this period (Lines 14 + 15).                              |        | \$0.00     |
| 17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16). |        | \$2,500.00 |

CASH SUMMARY

|   |  |          |
|---|--|----------|
| 18. Cash on hand (Lines 8 - 17)   |  | \$100.00 |
| Line 18 should equal your bank account balance(s) plus your petty cash balance. |  |          |
| 19. Liabilities: (Sum of loans and debts owed)                                  |  | \$0.00   |
| 20. Balance (Lines 18 - 19)   |  | \$100.00 |

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

KATIE GARROW - 09/03/2024

# 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

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[Committee Registration](#)

[Choosing Mini or Full Reporting](#)

[Bank Accounts](#)

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

### Key Dates: 2024

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CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

MARTIN LUTHER KING, JR. COUNTY LABOR COUNCIL COMM ON POLITICAL EDUCATION

5030 1st Ave S., Suite 301  
Seattle, WA 98134

Deposit date: 08/30/2024  
Report number: 110249052  
Submitted date: 10/04/2024

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

| Date received |   | Amount | Total  |
|---------------|---|--------|--------|
|               | a. Anonymous  | \$0.00 | \$0.00 |
|               | b. Candidate's personal funds deposited in the bank (include candidate loans in 1c) | \$0.00 | \$0.00 |
|               | c. Loans, notes, security agreements (Schedule L)                                   | \$0.00 |        |
|               | d. Miscellaneous receipts (interest, refunds, auctions, other)                      | \$0.00 |        |
|               | e. Small contributions  | \$0.00 |        |

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$1,000.00

Corresponds to amount on line 1, Schedule A to C4, and itemized below

3. ITEMIZED CONTRIBUTIONS

| Date received | Contributor<br>(Name and address)   | Employer and address | Amount     | Aggregate total |
|---------------|---|----------------------|------------|-----------------|
| 08/30/2024    | Martin Luther King Jr. County Labor Council<br>5030 1st Ave S., Suite 301 , Seattle, WA 98134 |                      | \$1,000.00 | N<br>\$3,500.00 |

Date of deposit  
08/30/2024

I certify this report is true and complete to the best of my knowledge  
Treasurer's signature and date  
KATIE GARROW - 10/04/2024

## Complaint Against: MLK, JR. COUNTY LABOR COUNCIL COMM ON POLITICAL EDUCATION

Submitted: 10/11/24

Notice to Respondent by: 10/21/24 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 1/9/25 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>

### Violations

The above referenced respondent political committee failed to timely file a C3 report disclosing a \$1000 deposit. The report was filed approximately 1 month late. See link and attached:

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110249052>

Moreover, this deposit on 8/30/24 was not disclosed on the C4 reporting covering the time period of August 2024, see link and attached: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110242062>

Judging by the fact that the Line 18 Cash on Hand numbers for this committee were not accurate for the above referenced C4, it is extremely likely that other C4 reports contain Line 18 Cash on Hand numbers that do not accurately reflect the committee's funds.

Additionally, the committee has failed to disclose address information for certain expenditure recipients.

| Recipient                 | Date       | Description                                | Recipient City | Recipient State | Amount     | Report                      |
|---------------------------|------------|--|----------------|-----------------|------------|-----------------------------|
| for Seattle Alexis        | 09/12/2024 | Monetary contributions to PAC or candidate |                |                 | \$350.00   | <a href="#">View Report</a> |
| for Thomas McLeod Friends | 01/26/2024 | Contribution                               | Tukwila        | WA              | \$500.00   | <a href="#">View Report</a> |
| Friends of Girmay         | 03/25/2024 | Contribution                               |                |                 | \$500.00   | <a href="#">View Report</a> |
| Keep Seattle Moving       | 09/12/2024 | Monetary contributions to PAC or candidate |                |                 | \$1,500.00 | <a href="#">View Report</a> |
| Raise the Wage Renton     | 01/26/2024 | Contribution                               | Seattle        | WA              | \$1,500.00 | <a href="#">View Report</a> |

<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>

## **Conclusion**

With the 2024 general election rapidly approaching, I urge the PDC staff to leap into 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.

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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**