

Respondent Name
Washington Association of Vehicle Subagents (WAVS)
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards reported via the portal (Tue, 5 Nov 2024 at 2:59 PM)</p> <p>Description of Complaint</p> <p>See attached complaint.</p> <p>Notice to Respondent</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Overcomplicated and outdated requirements that are difficult to understand and comply with.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>"The journey of a thousand miles begins with a single step." — Lao Tzu</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.



Washington Association of Vehicle Subagents (WAVS) 2024

- Overview
- Contributions
- Expenditures
- Pledges
- Debts
- Loans

Itemized Expenditures

\$59,387.94

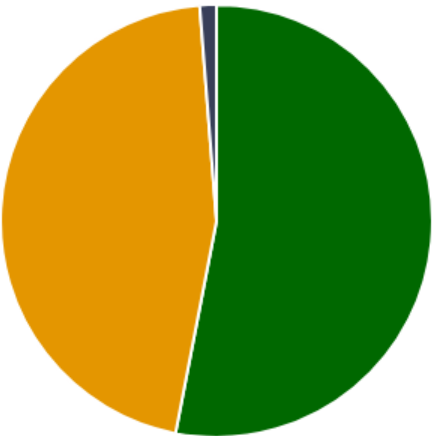
Shown below are the campaign’s expenditures. Small expenses may be grouped together and reported as one sum. Donated goods and services (known as in-kind contributions) also appear here as expenditures, with the contributor listed in the recipient column.

Expenditures by Expense Type

Management and consulting services
\$31,500.00

Monetary contributions to PAC...
\$27,150.00

Travel, accommodations, meals
\$737.94



Results for:

Recipient Name: Marian X

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Recipient Name

Marian X

Description

Enter text X

Date

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From

To

Recipient City

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Recipient State

Select

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Amount

From

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Show

50

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entries

Download 13 rows as CSV.

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Marian Dacca Public Affairs LLC	09/30/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	09/30/2024	Reimburse Travel	Bellevue	WA	\$17.29	View Report
Marian Dacca Public Affairs LLC	08/30/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	08/30/2024	Travel Reimbursement	Bellevue	WA	\$118.19	View Report
Marian Dacca Public Affairs LLC	08/03/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	08/03/2024	Mileage Reimbursement	Bellevue	WA	\$345.99	View Report
Marian Dacca Public Affairs LLC	06/07/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	06/07/2024	Hotel for Association Conference	Bellevue	WA	\$256.47	View Report
Marian Dacca Public Affairs LLC	05/31/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	04/26/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	04/05/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Marian Dacca Public Affairs LLC	02/16/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	01/24/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report

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Ballot Return Statistics

Ballot return statistics are posted after 5 p.m. each business day, beginning two weeks prior to Election Day and continuing until the election is certified.

For a complete ballot status report, see our [ballot status reports page](#). To check your own ballot status, visit [VoteWA.gov](#). For questions about the data, contact elections@sos.wa.gov.

Please allow a few moments for the report to load.

2024 General Election - Ballot Return Statistics



Statewide Summary

Counties

Returned Ballots

Returns by Day

Returns by Method

Returns by Age Range

Challenged Ballots

2020 Comparison

Last updated:
Monday, November 04, 2024
1 Day before Election
5,003,149 Voters in Election

Total Returned	Accepted	Challenged
2,835,164	2,754,974	29,133
% Returned	% Accepted	% Challenged
56.67%	55.06%	1.03%

Return by Age Range

Age Range	Returned	Not Returned
65+	77.7%	22.3%
55-64	65.2%	34.8%
45-54	55.0%	45.0%
35-44	47.4%	52.6%
25-34	39.0%	61.0%
18-24	34.7%	65.3%

Return by Date

Date	Returned
Oct 27	~30K
Oct 29	~240K
Oct 31	~250K
Nov 02	~120K
Nov 04	~220K

Return by Method

Method	Percentage
Mail	38.22%
Drop Box	60.96%
Other	0.82%

County	Voters	% Returned	% Challenged
Adams	8,277	38.93%	2.58%
Asotin	14,830	60.80%	1.50%
Benton	131,951	46.69%	0.75%
Chelan	53,496	61.97%	1.20%
Clallam	58,874	68.39%	0.93%
Clark	346,108	57.68%	1.35%
Columbia	2,974	69.70%	0.34%
Cowlitz	75,564	56.40%	0.96%
Douglas	27,320	53.03%	0.67%
Ferry	5,256	49.89%	0.80%
Franklin	46,019	48.28%	1.52%
Garfield	1,669	66.27%	0.99%
Grant	50,011	46.02%	2.27%
Grays Harbor	50,602	51.66%	0.60%
Island	63,985	66.20%	0.79%
Jefferson	28,520	73.16%	1.07%
King	1,425,454	57.78%	1.04%
Kitsap	196,280	59.74%	2.01%
Kittitas	31,440	60.94%	1.13%
Klickitat	16,473	56.30%	0.50%
Lewis	57,289	63.26%	1.05%
Total	5,003,149	56.67%	1.03%

Looking for data from past elections? Visit our [election data and statistics page](#).

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Washington Secretary of State

Elections Division

PO Box 40229

Olympia, WA 98504-0229

elections@sos.wa.gov

1 (800) 448-4881





Washington Association of Vehicle Subagents (WAVS) 2024

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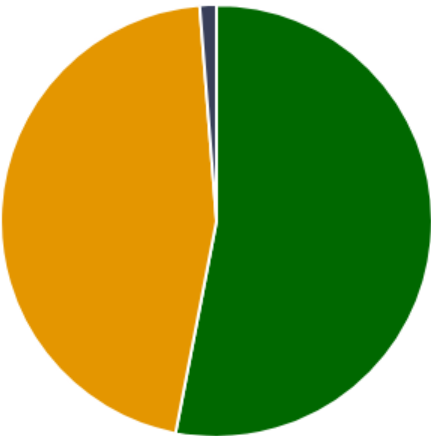
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Results for:

No selected filters.

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Recipient Name

Enter text

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Description

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Date

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Recipient City

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Recipient State

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Amount

From

To

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Show

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 entries

[Download 66 rows as CSV.](#)

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Marian Dacca Public Affairs LLC	01/24/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	02/16/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	04/26/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	04/05/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	05/31/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	06/07/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	08/03/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	08/30/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Marian Dacca Public Affairs LLC	09/30/2024	Management and consulting services	Bellevue	WA	\$3,500.00	View Report
Friends of Andy Barkus	06/07/2024	Monetary contributions to PAC or candidate	Lacey	WA	\$1,000.00	View Report
Friends of Laurie Jenkins	06/07/2024	Monetary contributions to PAC or candidate	Tacoma	WA	\$1,000.00	View Report

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Committee to Elect Jake Fey	06/07/2024	Monetary contributions to PAC or candidate	Tacoma	WA	\$1,000.00	View Report
Friends of Drew Stokesbary	06/07/2024	Monetary contributions to PAC or candidate	Auburn	WA	\$1,000.00	View Report
Curtis King for Senate	06/07/2024	Monetary contributions to PAC or candidate	Yakima	WA	\$1,000.00	View Report
John Braun for State Senate	06/07/2024	Monetary contributions to PAC or candidate	Chehalis	WA	\$1,000.00	View Report
Marko for Senate	06/07/2024	Monetary contributions to PAC or candidate	Seattle	WA	\$1,000.00	View Report
People for Joe Nguyen	06/07/2024	Monetary contributions to PAC or candidate	Seattle	WA	\$1,000.00	View Report
Committee to Elect Steve Hobbs	10/22/2024	Monetary contributions to PAC or candidate	Lake Stevens	WA	\$1,000.00	View Report
Committee to Elect Sharon Wylie	06/04/2024	Monetary contributions to PAC or candidate	Vancouver	WA	\$500.00	View Report
Committee to Elect Steve Hobbs	06/07/2024	Monetary contributions to PAC or candidate	Lake Stevens	WA	\$500.00	View Report
Friends of Davina Duerr	06/07/2024	Monetary contributions to PAC or candidate	Seattle	WA	\$500.00	View Report
Friends of Dave Paul	06/07/2024	Monetary contributions to PAC or candidate	Oak Harbor	WA	\$500.00	View Report
Committee to Elect Mike Volz	06/07/2024	Monetary contributions to PAC or candidate	Spokane	WA	\$500.00	View Report
Citizens to Elect Mike Steele	06/07/2024	Monetary contributions to PAC or candidate	Chelan	WA	\$500.00	View Report
Mark Klicker for State Representative	06/07/2024	Monetary contributions to PAC or candidate	Walla Walla	WA	\$500.00	View Report
Friends of Jim Walsh	06/07/2024	Monetary contributions to PAC or candidate	Aberdeen	WA	\$500.00	View Report
Committee to Elect Ed Orcutt	06/07/2024	Monetary contributions to PAC or candidate	Kalama	WA	\$500.00	View Report
Friends of Beth Doglio	06/07/2024	Monetary contributions to PAC or candidate	Olympia	WA	\$500.00	View Report

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Greg Nance for Kitsap	06/07/2024	Monetary contributions to PAC or candidate	Bainbridge Island	WA	\$500.00	View Report
People for Starlett Mena	06/07/2024	Monetary contributions to PAC or candidate	Tacoma	WA	\$500.00	View Report
Friends of Joe Fitzgibbon	06/07/2024	Monetary contributions to PAC or candidate	Burien	WA	\$500.00	View Report
Don Griffey for State House	06/07/2024	Monetary contributions to PAC or candidate	Allyn	WA	\$500.00	View Report
Friends of Sam Low	06/07/2024	Monetary contributions to PAC or candidate	Lake Stevens	WA	\$500.00	View Report
Carolyn Eslick Campaign	06/07/2024	Monetary contributions to PAC or candidate	Sultan	WA	\$500.00	View Report
Alex Ramel Campaign	06/07/2024	Monetary contributions to PAC or candidate	Bellingham	WA	\$500.00	View Report
Vote Joe Timmons	06/07/2024	Monetary contributions to PAC or candidate	Bellingham	WA	\$500.00	View Report
Friends of Brandy Donaghy	06/07/2024	Monetary contributions to PAC or candidate	Mill Creek	WA	\$500.00	View Report
Friends of Debra Entenman	06/07/2024	Monetary contributions to PAC or candidate	Kent	WA	\$500.00	View Report
Friends of Derek Stanford	06/07/2024	Monetary contributions to PAC or candidate	Bothell	WA	\$500.00	View Report
Jeff Holy for Senate	06/07/2024	Monetary contributions to PAC or candidate	Spokane	WA	\$500.00	View Report
Wilson for Senate	06/07/2024	Monetary contributions to PAC or candidate	Longview	WA	\$500.00	View Report
Friends of Drew Hansen	06/07/2024	Monetary contributions to PAC or candidate	Seattle	WA	\$500.00	View Report
Friends of Chris Gildon	06/07/2024	Monetary contributions to PAC or candidate	Puyallup	WA	\$500.00	View Report
Liz Lovelett for State Senate	06/07/2024	Monetary contributions to PAC or candidate	Anacortes	WA	\$500.00	View Report
Committee to Elect John Lovick	06/07/2024	Monetary contributions to PAC or candidate	Mill Creek	WA	\$500.00	View Report

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Committee to Elect John Lovick	10/14/2024	Monetary contributions to PAC or candidate	Mill Creek	WA	\$500.00	View Report
Committee to Elect Jake Fey	10/22/2024	Monetary contributions to PAC or candidate	Tacoma	WA	\$400.00	View Report
Marian Dacca Public Affairs LLC	08/03/2024	Mileage Reimbursement	Bellevue	WA	\$345.99	View Report
Marian Dacca Public Affairs LLC	06/07/2024	Hotel for Association Conference	Bellevue	WA	\$256.47	View Report
CLEVELAND ANNETTE	06/07/2024	Monetary contributions to PAC or candidate	VANCOUVER	WA	\$250.00	View Report
Friends of Larry Springer	06/07/2024	Monetary contributions to PAC or candidate	Kirkland	WA	\$250.00	View Report
Suzanne Schmidt for State Representative	06/07/2024	Monetary contributions to PAC or candidate	Spokane Valley	WA	\$250.00	View Report
Friends of Claudia Kaufman	06/07/2024	Monetary contributions to PAC or candidate	Seattle	WA	\$250.00	View Report
People for Sharon	06/07/2024	Monetary contributions to PAC or candidate	Bellingham	WA	\$250.00	View Report
Hackney for the 11th	06/07/2024	Monetary contributions to PAC or candidate	Seattle	WA	\$250.00	View Report
Committee to Elect Tom Dent	06/07/2024	Monetary contributions to PAC or candidate	Moses Lake	WA	\$250.00	View Report
Friends of Dan Bronoske	06/07/2024	Monetary contributions to PAC or candidate	Lakewood	WA	\$250.00	View Report
Vote Liz Berry	06/07/2024	Monetary contributions to PAC or candidate	Seattle	WA	\$250.00	View Report
Friends of Julio Cortes	06/07/2024	Monetary contributions to PAC or candidate	Everett	WA	\$250.00	View Report
Friends of April Berg	06/07/2024	Monetary contributions to PAC or candidate	Mill Creek	WA	\$250.00	View Report
Friends of Twina Nobles	06/07/2024	Monetary contributions to PAC or candidate	University Place	WA	\$250.00	View Report
Claire for Senate	06/07/2024	Monetary contributions to PAC or candidate	Federal Way	WA	\$250.00	View Report

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Javier Valdez for State Representative	06/07/2024	Monetary contributions to PAC or candidate	Seattle	WA	\$250.00	View Report
Friends of Roger Goodman	06/07/2024	Monetary contributions to PAC or candidate	Kirkland	WA	\$250.00	View Report
Marian Dacca Public Affairs LLC	08/30/2024	Travel Reimbursement	Bellevue	WA	\$118.19	View Report
Marian Dacca Public Affairs LLC	09/30/2024	Reimburse Travel	Bellevue	WA	\$17.29	View Report

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Washington Association of Vehicle Subagents (WAVS) 2024

- Overview
- Contributions
- Expenditures
- Pledges
- Debts
- Loans

Committee Overview

Registered January 7, 2007
Continuing Committee (Business)
Treasurer is Diane Skocilich

Committee Contact

10208 N Division St. Ste. 101
Spokane, WA 99218
treasurer@wavs-wa.org
509-220-4004

Financial Overview

\$182,098.75	+	\$22,190.90	+	\$0.00	=	\$204,289.65
Starting balance		Contributions		Loans		Total raised
\$59,387.94				\$0.00		\$0.00
Total spent				Pledges		Debt

Committee Reports and Forms

- Registration Form
- Contributors and Vendors Map

Made to committee for 2024

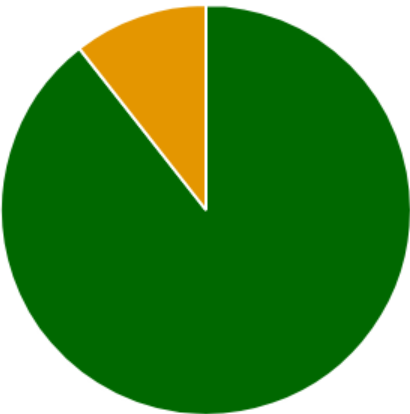
Contributions

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

Contributions made to committee for 2024

Business
\$19,840.90

Individual
\$2,350.00



Made by committee for 2024

Expenditures

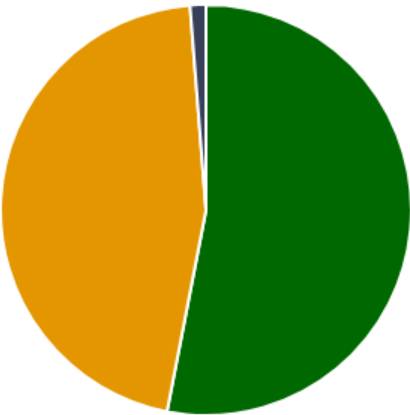
See how the committee has spent money, and what kind of goods and services it received as in-kind contributions.

Expenditures made by candidate for 2024

Management and consulting services
\$31,500.00

Monetary contributions to PAC...
\$27,150.00

Travel, accommodations, meals
\$737.94



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 18 rows as CSV.

Period	Report Number	Filed	Report	Form Type	Election Year
01/01/2024 - 01/31/2024	110209543	04/10/2024	View Report	C4	2024
02/01/2024 - 02/29/2024	110209547	04/10/2024	View Report	C4	2024
02/16/2024 - 02/16/2024	110209532	04/10/2024	View Report	C3	2024
02/24/2024 - 02/24/2024	110209536	04/10/2024	View Report	C3	2024
03/01/2024 - 03/31/2024	110209556	04/10/2024	View Report	C4	2024
04/01/2024 - 04/30/2024	110215741	05/15/2024	View Report	C4	2024
04/26/2024 - 04/26/2024	110258689	11/04/2024	View Report	C3	2024
05/01/2024 - 05/31/2024	110258667	11/04/2024	View Report	C4	2024
05/15/2024 - 05/15/2024	110258687	11/04/2024	View Report	C3	2024
05/15/2024 - 05/15/2024	110258685	11/04/2024	View Report	C3	2024
06/01/2024 - 07/15/2024	110259022	11/05/2024	View Report	C4	2024
07/16/2024 - 07/29/2024	110259025	11/05/2024	View Report	C4	2024
07/30/2024 - 08/31/2024	110259026	11/05/2024	View Report	C4	2024

Period	Report Number	Filed	Report	Form Type	Election Year
08/03/2024 - 08/03/2024	110259023	11/05/2024	View Report	C3	2024
09/01/2024 - 10/14/2024	110259027	11/05/2024	View Report	C4	2024
10/15/2024 - 10/28/2024	110259030	11/05/2024	View Report	C4	2024
10/24/2024 - 10/24/2024	110259029	11/05/2024	View Report	C3	2024
10/24/2024 - 10/24/2024	110259028	11/05/2024	View Report	C3	2024

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FILE ONLINE

Complaint Against: Washington Association of Vehicle Subagents (WAVS)

Submitted: 11/5/24

Notice to Respondent Due By: 11/15/24 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 2/3/25 per RCW 42.17A.755(3)

Statutes Violated: RCW 42.17A.235, .240, see WAC 390-16-205.

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

Violations

Failure to file timely/accurate C3 & C4 reports.

This respondent made several tens of thousands of dollars' worth of donations to political candidates in the 2024 campaign cycle that were not reported until election day. These reports were filed significantly late. **By that time, 2.8 million WA state voters (56.7% of total eligible voters) had already cast their ballot.** See attached.

The committee failed to timely file the following reports:

- 1) May C4 – Due on 6/10/24, wasn't filed until 11/5/24. This report was filed 147 days late and contained \$3,500 worth of expenditures. See link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110258667>
- 2) C3 Report for 5/15/24 Deposit – Due on 6/10/24, wasn't filed until 11/5/24. This report was filed 147 days late and contained \$350 worth of receipts, see link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110258685>
- 3) C3 Report for 5/15/24 Deposit – Due on 6/10/24, wasn't filed until 11/5/24. This report was filed 147 days late and contained \$2,000 worth of receipts, see link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110258687>

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>

- 4) C3 Report for 4/26/24 Deposit – Due on 5/10/24, wasn't filed until 11/5/24. This report was filed 178 days late and contained \$3,066.15 worth of contributions, see link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110258689>
- 5) 21-Day pre-primary C4 – Due on 7/16/24, wasn't filed 11/5/24. This report was filed 112 days late and contained \$29,006.47 worth of expenditures. See link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259022>
- 6) C3 Report for 8/3/24 Deposit – Due on 8/5/24, wasn't filed until 11/5/24. This report was filed 92 days late and contained \$970 of contributions. See link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259023>
- 7) 7-Day pre-primary C4 – Due on 7/30/24, wasn't filed 11/5/24. This report was filed 98 days late and contained \$0 worth of expenditures. See link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259025>
- 8) Post-primary C4 – Due on 9/10/24, wasn't filed until 11/5/24. This report was filed 56 days late and contained \$7,464.18 worth of expenditures. See link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259026>
- 9) 21-day pre-general C4 – Due on 10/15/24, wasn't filed until 11/5/24. This report was filed 21 days late and contained \$4,017.29 worth of expenditures. See link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259027>
- 10) C3 Report for 10/24/24 Deposit – Due on 10/28/24, wasn't filed until 11/5/24. This report was filed 8 days late and contained \$3,636.60 of contributions. See link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259028>
- 11) C3 Report for 10/24/24 Deposit – Due on 10/28/24, wasn't filed until 11/5/24. This report was filed 8 days late and contained \$4,007.55 of contributions. See link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259029>
- 12) 7-day pre-general C4 – Due on 10/29/24, wasn't filed until 11/5/24. This report was filed 7 days late and contained \$1,400.00 worth of expenditures. See link:
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259030>

Failure to Disclose Subvendors

Additionally, several of the expenditures made to Marian Dacca Public Affairs LLC appear to not have disclosed subvendors as required by WAC 390-16-205.

Conclusion

With only mere hours remaining before the 2024 general election is concluded, I urge the PDC staff to leap into action and resolve the noncompliance identified in this complaint.

Best,

Electronically signed Conner Edwards

/s/ Conner Edwards

Complainant

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.

"The journey of a thousand miles begins with a single step."

— Lao Tzu