### **Respondent Name**

Earth Ministry/WA IPL PAC

### **Complainant Name**

**Conner Edwards** 

#### **Complaint Description**

<u>Conner Edwards</u> reported via the portal (Mon, 4 Nov 2024 at 2:23 PM)

#### **Description of Complaint**

See attached complaint.

#### 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?

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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: <u>https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/</u>

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

# 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.

Check your ballot status at <u>VoteWA.gov</u>. If your ballot has not been received yet, you can print out a replacement ballot at <u>VoteWA.gov</u> or visit a county elections office or voting center to request one. Election Day is Tuesday, November 5 and drop boxes close at 8 p.m.

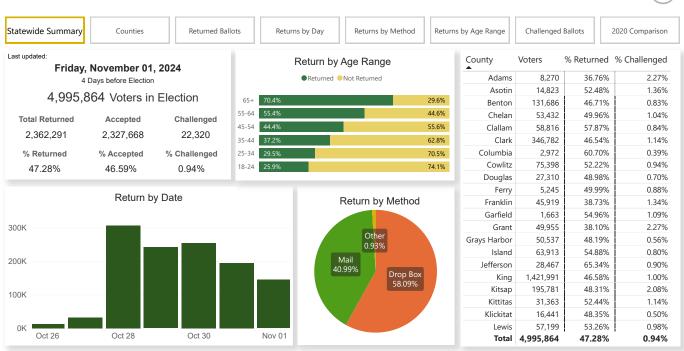


# Ballot Return Statistics

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

Microsoft Power BI

6 2

?

Looking for data from past elections? Visit our election data and statistics page.

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# Earth Ministry/WA IPL PAC Sponsored by Earth Ministry/Washington Interfaith Power and Light (2024)

		<u>Expenditures</u>	<u>Pledges</u>	<u>Debts</u>	<u>Loans</u>			
	ed Expenditu	res						
\$4,258.9	90							
sum. Do	elow are the campa nated goods and se tor listed in the reci	rvices (known as i	-	-		-	-	
		Expe	enditures by Ex	pense Type				
	ntribution							
\$4,258.90								
Results for:	d filters.							
Results for:								
Results for: No selecte ^ Hide Fil								
Results for: No selecte ^ Hide Fil	ters Q Search Tips ent Name						) X	
Results for: No selecte ^ Hide Fil Recipio	ters Q Search Tips ent Name text						) <b>x</b>	

11/4/24, 2:14 PM

From	То	X	
Recipient City			
Enter text			X
Recipient State			
Recipient State Select			X

Show 50 ~ entries

### Download 12 rows as CSV.

Recipient <b>A</b>	Date 🗸	Description \$	Recipient City	♣ Recipient State	♦ Amount ♦	Report 🖨
Earth Ministry/Washington Interfaith Power and Light	10/25/2024	Web hosting in opposition to I-2117	Seattle	WA	\$4.57	<u>View</u> <u>Report</u>
Earth Ministry/Washington Interfaith Power and Light	10/25/2024	Salary and benefits for October '24 in Opposition to I-2117: Sarah Robinson, AC Churchill	Seattle	WA	\$852.05	<u>View</u> <u>Report</u>
Earth Ministry/Washington Interfaith Power and Light	09/30/2024	Web hosting in opposition to I-2117	Seattle	WA	\$4.57	<u>View</u> <u>Report</u>
Earth Ministry/Washington Interfaith Power and Light	09/30/2024	Salary and benefits for Sept '24 in Opposition to I-2117: Sarah Robinson, AC Churchill	Seattle	WA	\$852.05	<u>View</u> <u>Report</u>
Earth Ministry/Washington Interfaith Power and Light	09/27/2024	Qty. 50 (24'x18' Double-sided) yard signs in opposition to I-2117, Trade Printery: 3415 S 116th St, Suite 113 Tukwila, WA 98168	Seattle	WA	\$651.07	<u>View</u> <u>Report</u>
Earth Ministry/Washington Interfaith Power and Light	09/13/2024	Printed flyers in opposition to I-2117, 214 double-sided flyers, FedEx Printing: 2220 S 37th Street, Ste 8, Tacoma, WA, 98409	Seattle	WA	\$117.19	<u>View</u> <u>Report</u>
Earth Ministry/Washington Interfaith Power and Light	09/13/2024	Qty: 500 (11x17 signs) in opposition for I-2117, Trade Printery: 3415 S 116th St, Suite 113 Tukwila, WA 98168	Seattle	WA	\$239.84	<u>View</u> <u>Report</u>

11/4/24, 2:14 PM

Earth Ministry/WA IPL PAC Sponsored by Earth Ministry/Washington Interfaith Power and Light - 2024 | Washington State Public ...

Recipient <b>A</b>	Date 👻	Description \$	Recipient City	\$ Recipient State	\$ Amount 🖨	Report 3	\$
Earth Ministry/Washington Interfaith Power and Light	08/31/2024	Salary and benefits for August '24 in Opposition to I-2117: Sarah Robinson, AC Churchill	Seattle	WA	\$817.93	<u>View</u> <u>Report</u>	
Earth Ministry/Washington Interfaith Power and Light	08/30/2024	Web hosting and targeted email system in opposition to I-2117	Seattle	WA	\$22.47	<u>View</u> <u>Report</u>	
Earth Ministry/Washington Interfaith Power and Light	08/16/2024	Printed flyers in opposition to I-2117, 100 double-sided flyers, FedEx Printing: 336 116th Ave NE Bellevue, WA 98004- 5211	Seattle	WA	\$134.44	<u>View</u> <u>Report</u>	
Earth Ministry/Washington Interfaith Power and Light	07/31/2024	Web hosting and targeted email system in opposition to I-2117	Seattle	WA	\$6.06	<u>View</u> <u>Report</u>	
Earth Ministry/Washington Interfaith Power and Light	07/31/2024	Salary and benefits for July '24 in Opposition to I-2117: Sarah Robinson, AC Churchill	Seattle	WA	\$556.66	<u>View</u> <u>Report</u>	

Showing 1 to 12 of 12 entries

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# Earth Ministry/WA IPL PAC Sponsored by Earth Ministry/Washington Interfaith Power and Light <sup>2024</sup>

<u>Overview</u>	<u>Contributions</u>	Expenditures Pl	edges Debts	<u>Loans</u>	
Committee	Overview				
Statewic	ed October 30, 20 de Ballot Measure er is AC Churchill	24			
Committee	Contact				
	WA 98103 @earthministry.or	g			
Financial O	verview				
<b>\$0.00</b> Starting bala	nce + <b>\$9,258</b> Contribut	T	= <b>\$13,517.8</b> Total raised	30	
<b>\$4,258.9</b> Total spent	D	<b>\$0.00</b> Pledges		<b>\$0.00</b> Debt	
Committee	Reports and Forn	ıs			
<u>Registration</u>	Form				

11/4/24, 2:13 PM

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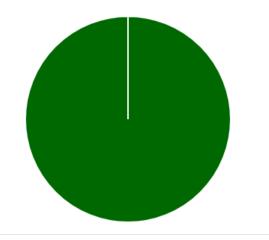
Contributors and Vendors Map

# Made to committee for 2024 Contributions

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

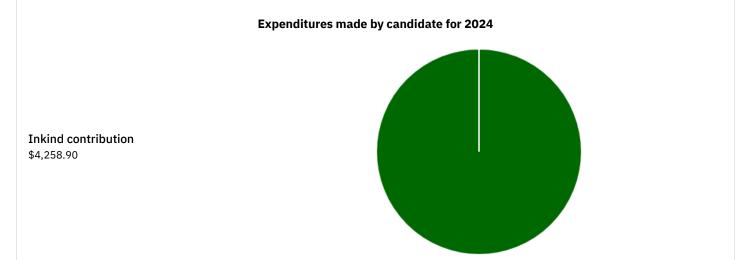
# Contributions made to committee for 2024

**Other** \$9,258.90



# 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.



# Made to committee

# <u>Loans</u>

See loans received, forgiven or paid by the campaign.

# \$4,258.90

Held by committee
<u>Debts</u>

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  $25 \sim$  entries

Download 6 rows as CSV.

Period	Report Number 🛛 🗕	Filed 🗘	Report 🗘	Form Type	e 🗘 Elec	tion Year	\$
07/01/2024 - 07/31/2024	110258419	11/04/2024	View Report	C4	202	4	
07/26/2024 - 07/26/2024	110258405	11/04/2024	View Report	C3	202	4	
08/01/2024 - 08/31/2024	110258569	11/04/2024	View Report	C4	202	4	
08/04/2024 - 08/04/2024	110258404	11/04/2024	View Report	C3	202	4	
09/01/2024 - 10/14/2024	110258570	11/04/2024	View Report	C4	2024		
10/15/2024 - 10/28/2024	110258578	11/04/2024	View Report	C4	2024		
Showing 1 to 6 of 6 entrie	es				Previous	1 N	lext

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FILE ONLINE

Complaint Against: Earth Ministry/WA IPL PAC Submitted: 11/4/24 Notice to Respondent Due By: 11/14/24 per WAC 390-37-050(1) 90 Day Initial Hearing Deadline: 2/2/25 per RCW 42.17A.755(3)

Statutes Violated: RCW 42.17A.205, .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>

# Violation

This committee was required to file reports beginning in July of 2024. This committee failed to file a single report on time. Instead, it waited to file all of its required C4 reports until November 4, 2024, after 47.28% of ballots have already been cast. See attached.

This committee also failed to timely register. Based on its disclosed transactions, its first reportable activity occurred on 7/26/24. The committee was obligated to file a registration within 14 days or by 8/9/24. It failed to do so. The registration was not filed until 10/30/24. This makes the registration 82 days late. See link:

https://apollo.pdc.wa.gov/public/registrations/registration?registration\_id=61722

Additionally, it appears that the committee failed to disclose subvendors for the in-kind contributions relating to webhosting. I'm sure that the agency staff believe this is required.

Because of the amount raised/spent, this committee did not qualify for "mini" reporting.

# **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

<sup>&</sup>lt;sup>1</sup> <u>https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics</u>

<sup>&</sup>lt;sup>2</sup> <u>https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics/key-dates-</u> 2024

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