

<b>Respondent Name</b>
WA Academy of Eye Physicians & Surgeons
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<p><a href="#">Conner Edwards</a> reported via the portal (Mon, 4 Nov 2024 at 12:53 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Overcomplicated and outdated requirements that are difficult to understand and comply with.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>“The journey of a thousand miles begins with a single step.” — Lao Tzu</p>
<b>What impact does the alleged violation(s) have on the public?</b>
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.
<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.



# Grassroots Lobbying

## Definition

Grassroots lobbying is defined as a program *addressed to the general public, a substantial portion of which is intended, designed or calculated primarily to influence state legislation.* [RCW 42.17A.640](#)

Typical grassroots lobbying expenditures include:

- newspaper advertisements to support proposed legislation,
- hiring a person to organize public meetings in order to influence action on issues being considered by the legislature,
- creating or maintaining websites, purchasing e-mail lists, or hiring someone to conduct other online activities, and
- hiring signature gatherers to circulate petitions for an initiative to the Legislature.

The Washington State Legislature recently updated legislation regarding grassroots lobbying through [House Bill 1317](#). Click [here](#) to see the updated sections of RCW 42.17A.640.

In December 2023, the Public Disclosure Commission approved new rules for grassroots lobbying under [WAC 390-20-125](#).

## Disclosure

### Registration Requirement

Any person or entity making grassroots lobbying expenditures not reported by a registered lobbyist, a candidate, or a political committee **exceeding \$1,500** in the aggregate in a one-month period or **exceeding \$3,000** in the aggregate in any three-month period must register as a sponsor of a grassroots lobbying campaign. Exception: If an organization sends a notice about pending legislation to its members, or a corporation sends a similar message to its stockholders, the expenses related to these activities are not reportable as grassroots lobbying.

A campaign must register and file its initial grassroots lobbying report ([PDC Form L-6](#)) within 24 hours of the initial presentation to the public when that occurs during the period beginning 30 days before the regular legislative session through the end of that session, or during any special session.

Any other time of the year, grassroots lobbying campaigns must register with the PDC within five days of the initial presentation to the public. Thereafter, sponsors file monthly reports on the 10th of the month covering the preceding calendar month. When the campaign is finished and the last report is being filed, check the final report box.

Please note that any grassroots lobbying campaigns that also meet the definition of [electioneering communication](#) will need to also report via a [C-6](#). ([WAC 390-16-063](#))

### Sponsor Identification

Any advertising or mass communication produced as part of the campaign must include the following disclosures.

- All written communications need to include the sponsor's name and address and all radio and television communications need to include the sponsor's name.
- If the sponsor is a political committee controlled directly or indirectly by an individual, corporation, union, association or other entity, the communications need to include the name of that individual or entity.
- If a communication or advertisement costs \$1,000 or more, it needs to include a list of the campaign's top five contributors as described in RCW 42.17A.350. If one of those contributors is a political action committee, follow disclosure requirements under RCW 42.17A.350(2).
- RCW 42.17A.640 describes the requirements for sponsor identification on written communications, television and radio broadcasts.

## Alternative Disclosure Methods

Lobbyists can relieve their employers from the responsibility of filing an L-6 report by including grassroots lobbying expenditures on their L-2 reports, *provided* that the grassroots campaign is financed out of the employer's existing funds. If the employer conducts a special fundraising effort or accepts funds from other sources to finance the grassroots lobbying, L-6 reporting is required (and expenses would not be included on the L-2).

Candidates and political committees who sponsor grassroots lobbying campaigns do not need to file L-6 reports, whether they use existing funds or receive funds from outside sources. Instead, the contribution and expenditure activity, including that related to grassroots lobbying, is fully reported on their campaign disclosure reports (the "C" series).

## Recommended Reading

[Find grassroots lobbying \(L-6\) reports](#)

[Grassroots lobbying and exemption from registration and reporting](#)

### Lobbying

Who Needs to Report

Lobbyists

Lobbyist Employers

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## 2023-WA ACADEMY OF EYE PHYSICIANS & SURGEONS L3 Report

Suanna Barnett  
[susanna@wsma.org](mailto:susanna@wsma.org)  
 2001 6TH AVE STE 2700  
 SEATTLE, WA 98121  
 United States  
 Phone: 206-956-3652

Filed: February 28, 2024  
 Year Report Covers: 2023

Listed below are total salary and fees reported on the registered lobbyists/lobbyist firms monthly expense report (L2).

Compensation shows the amount incurred (what was paid and may be owing) during the year for lobbying-related compensation. This include any funds set aside for deferred income, bonuses or the value of similar deferred payments paid or due.

Expenses shows the amount in expenditures made to or through the lobbyists. Expenditures include amounts paid or due the lobbyist for: reportable personal expenses; entertainment, gifts and travel for legislators, state officials and employees and their families; contributions to elected officials, candidates and political committees that were transmitted or delivered by the lobbyist; advertising, printing, and other informational literature; and other reportable expenses paid to or through the lobbyist in support of your lobbying objectives.

### Names of registered lobbyist.

NAME	COMPENSATION	COMPENSATION TO SUB-LOBBYIST	EXPENSES	TOTAL AMOUNT
<a href="#">SUSAN S TRACY</a>	\$57000.00	-\$0.00	\$305.00	\$57305.00
<a href="#">LISA THATCHER</a>	\$78000.00	-\$0.00	\$623.56	\$78623.56
<a href="#">CHRISTOPHER BANDOLI</a>	\$48000.00	-\$0.00	\$0.00	\$48000.00
<b>TOTAL EXPENSES BY OR THROUGH LOBBYISTS</b>				\$183928.56

### Names of registered lobbyist.

Listed below are total salary and fees data entered by the employer to correct totals reported by the lobbyist.

### Contributions

Contributions shown below are the sum totals provided by the employer on block 4 of the report and are entered as filed by the employer. The totals in this section are political contributions to candidates for legislative or statewide executive office, committees supporting or opposing these candidates, or committees supporting or opposing statewide ballot measures and may include amounts from non-itemized contributions that are not reflected in the detailed compensation information that follows.

#### Summary itemized political contributions.

Summary of itemized political contributions have not been entered for this report.

### Aggregate total of all non-itemized contributions.

Summary of aggregate totals of all non-itemized contributions have not been entered for this report.

### Summary affiliated PACs.

#### PAC NAME

PHYSICIANS EYEPAC - WA ACADEMY OF EYE PHYSICIAN & SURGEONS

### Independent Expenditures

Independent expenditures shown below are the sum totals provided by the employer on block 5 of the report and are entered as filed by the employer. The totals in this section are independent expenditures supporting or opposing a candidate for legislative or statewide executive office or a statewide ballot measure.

#### Summary independent expenditures supporting or opposing Legislative/State Executive candidates.

Summary of independent expenditures supporting or opposing Legislative or State Executive candidates have not been entered for this report.

#### Summary expenditures supporting/opposing statewide ballot propositions.

Summary for expenditures supporting or opposing statewide ballot proposition has not been entered for this report.

### Expenditures

Expenditures shown below are the sum totals provided by the employer on block 6 of the report and are entered as filed by the employer. The totals in this section are expenditures to or on behalf of legislators, state officials, or their spouse, registered domestic partner and dependents for the purpose of influencing, honoring or benefiting the legislator or official.

#### Summary Entertainment expenditures.

Summary of entertainment expenditures have not been entered for this report.

#### Summary itemized expenditure for influencing, honoring or benefiting a legislator or official.

Summary of itemized expenditures that were for the purpose of influencing, honoring or benefiting a legislator or official have not been entered for this report.

#### Summary other lobbying related expenditures.

Summary of other lobbying related expenditures have not been entered for this report.

#### Summary other expenditures not listed elsewhere.

#### **Gross roots lobbying expenses and payments for lobbying communications:**

288757.25

### Other Compensation

Other contributions shown below are the sum totals provided by the employer on block 3 and 12 of the report and are entered as filed by the employer. The totals in this section are other employment compensation and compensation during the calendar year for professional services paid to any corporation, partnership, joint venture, association or other entity in which state elected official, successful state candidate or member of their immediate family hold office, partnership, directorship or ownership interest of 10% or more.

#### Summary employment or services paid to state elected officials or successful candidates.

Summary of compensation for employment or services paid to state elected officials or successful candidates have not been entered for this report.

Summary compensation for professional services paid to corporations, partnerships, etc.

Summary of compensation for professional services paid to corporations, partnerships, etc have not been entered for this report.



# PHYSICIANS EYEPAC - WASHINGTON ACADEMY OF PHYSICIANS & SURGEONS

2023

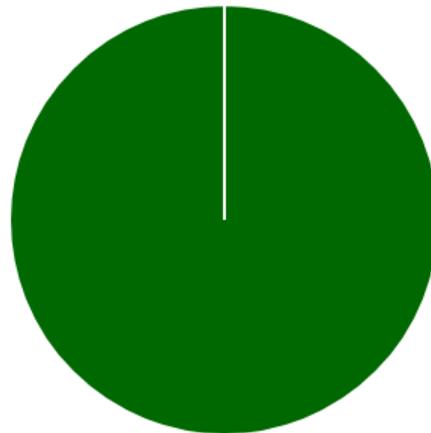
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- Pledges
- Debts
- Loans

## Itemized Expenditures

\$400.00

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



Monetary contributions to PAC...  
\$400.00

Results for:

No selected filters.

Hide Filters Search Tips

Recipient Name

X

Description

X

**Date**  
  X

**Recipient City**  
 X

**Recipient State**  
 X

**Amount**  
  X

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Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
CMTE TO ELECT RON MUZZALL	12/01/2023	Monetary contributions to PAC or candidate	OAK HARBOR	WA	\$400.00	<a href="#">View Report</a>

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## 2022-WA ACADEMY OF EYE PHYSICIANS & SURGEONS L3 Report

Kim Conn

[susanna@wsma.org](mailto:susanna@wsma.org)

2001 6TH AVE STE 2700

SEATTLE, WA 98121

United States

Phone: 206-956-3652

Amended: February 8, 2023

Filed: January 12, 2023

Year Report Covers: 2022

### Salary and fees reported by lobbyists/lobbyist firms as of January 12, 2023 at the time this reports was filed by the employer.

Listed below are total salary and fees reported on the registered lobbyists/lobbyist firms monthly expense report (L2).

Compensation shows the amount incurred (what was paid and may be owing) during the year for lobbying-related compensation. This include any funds set aside for deferred income, bonuses or the value of similar deferred payments paid or due.

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#### Names of registered lobbyist.

NAME	COMPENSATION	COMPENSATION TO SUB-LOBBYIST	EXPENSES	TOTAL AMOUNT
<a href="#">CARNEY BADLEY SPELLMAN*</a>	\$36000.00	-\$0.00	\$9.44	\$36009.44
<a href="#">SUSAN S TRACY</a>	\$73000.00	-\$0.00	\$250.00	\$73250.00
<a href="#">LISA THATCHER</a>	\$64500.00	-\$0.00	\$3500.00	\$68000.00
<a href="#">CHRISTOPHER BANDOLI</a>	\$12000.00	-\$0.00	\$46.80	\$12046.80
<b>TOTAL EXPENSES BY OR THROUGH LOBBYISTS</b>				\$189306.24

#### Names of registered lobbyist.

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## 2022-WA ACADEMY OF EYE PHYSICIANS & SURGEONS L3 Report

Kim Conn

[susanna@wsma.org](mailto:susanna@wsma.org)

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PHYSICIANS EYEPAC - WASHINGTON ACADEMY OF EYE PHYSICIAN AND

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# PHYSICIANS EYEPAC - WASHINGTON ACADEMY OF PHYSICIANS & SURGEONS

2022

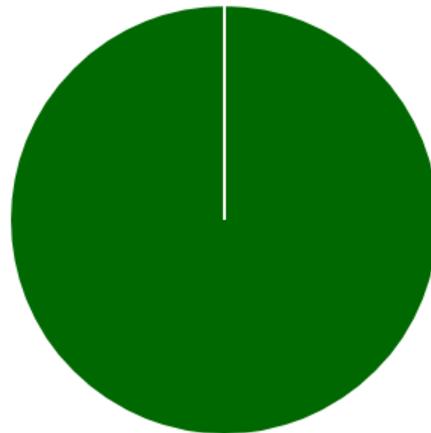
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## Itemized Expenditures

\$40,500.00

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Expenditures by Expense Type



Monetary contributions to PAC...

\$40,500.00

Results for:

No selected filters.

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Recipient Name

Enter text X

Description

Enter text X

**Date**  
  X

**Recipient City**  
 X

**Recipient State**  
 X

**Amount**  
  X

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Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
CMTE TO ELECT AMY WALEN	10/13/2022	Monetary contributions to PAC or candidate	REDMOND	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT BETH DOGLIO	07/13/2022	Monetary contributions to PAC or candidate	OLYMPIA	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT CHRISTINE ROLFES	10/13/2022	Monetary contributions to PAC or candidate	POULSBO	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT CURTIS KING	10/13/2022	Monetary contributions to PAC or candidate	YAKIMA	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT DREW STOKESBARY	07/13/2022	Monetary contributions to PAC or candidate	AUBURN	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT JACQUELIN MAYCUMBER	07/13/2022	Monetary contributions to PAC or candidate	COLVILLE	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT JAMIE PEDERSEN	07/13/2022	Monetary contributions to PAC or candidate	SEATTLE	WA	\$1,000.00	<a href="#">View Report</a>
CMTE TO ELECT JESSE SALOMON	10/13/2022	Monetary contributions to PAC or candidate	SEATTLE	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT JESSICA BATEMAN	07/13/2022	Monetary contributions to PAC or candidate	OLYMPIA	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT JOEL KRETZ	07/13/2022	Monetary contributions to PAC or candidate	WAUCONDA	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT JOE NGUYEN	07/13/2022	Monetary contributions to PAC or candidate	SEATTLE	WA	\$500.00	<a href="#">View Report</a>

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
CMTE TO ELECT JOE SCHMICK	07/13/2022	Monetary contributions to PAC or candidate	COLFAX	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT JT WILCOX	08/26/2022	Monetary contributions to PAC or candidate	MCKENNA	WA	\$1,000.00	<a href="#">View Report</a>
CMTE TO ELECT JUDY WARNICK	07/13/2022	Monetary contributions to PAC or candidate	MOSES LAKE	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT KAREN KEISER	08/26/2022	Monetary contributions to PAC or candidate	DES MOINES	WA	\$1,000.00	<a href="#">View Report</a>
CMTE TO ELECT LAURIE JINKINS	08/26/2022	Monetary contributions to PAC or candidate	TACOMA	WA	\$1,000.00	<a href="#">View Report</a>
CMTE TO ELECT LELACH RAVE	10/13/2022	Monetary contributions to PAC or candidate	Seattle	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT LELACH RAVE	06/08/2022	Monetary contributions to PAC or candidate	Seattle	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT LISA WELLMAN	03/25/2022	Monetary contributions to PAC or candidate	MERCER ISLAND	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT MARCUS RICCELLI	08/31/2022	Monetary contributions to PAC or candidate	SPOKANE	WA	\$1,000.00	<a href="#">View Report</a>
CMTE TO ELECT MARI LEAVITT	10/13/2022	Monetary contributions to PAC or candidate	TACOMA	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT MARK JAMES	07/13/2022	Monetary contributions to PAC or candidate	MARYSVILLE	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT MARK MULLET	10/13/2022	Monetary contributions to PAC or candidate	ISSAQUAH	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT MATTHEW BOEHNKE	07/13/2022	Monetary contributions to PAC or candidate	KENNEWICK	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT MICHELLE CALDIER	08/26/2022	Monetary contributions to PAC or candidate	PORT ORCHARD	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT MY-LINH THAI	08/26/2022	Monetary contributions to PAC or candidate	BELLEVUE	WA	\$1,000.00	<a href="#">View Report</a>
CMTE TO ELECT NANCY CONNOLLY	06/08/2022	Monetary contributions to PAC or candidate	Seattle	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT NICOLE MACRI	10/13/2022	Monetary contributions to PAC or candidate	SEATTLE	WA	\$500.00	<a href="#">View Report</a>

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
CMTE TO ELECT PAUL HARRIS	07/13/2022	Monetary contributions to PAC or candidate	VANCOUVER	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT PETER ABBARNO	07/13/2022	Monetary contributions to PAC or candidate	CENTRALIA	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT RON MUZZALL	10/13/2022	Monetary contributions to PAC or candidate	OAK HARBOR	WA	\$1,000.00	<a href="#">View Report</a>
CMTE TO ELECT SHARON T SANTOS	07/13/2022	Monetary contributions to PAC or candidate	SEATTLE	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT SHELLY SHORT	07/13/2022	Monetary contributions to PAC or candidate	ADDY	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT SIMON SEFZIK	10/13/2022	Monetary contributions to PAC or candidate	Ferndale	WA	\$1,000.00	<a href="#">View Report</a>
CMTE TO ELECT SPENCER HUTCHINS	09/27/2022	Monetary contributions to PAC or candidate	Gig Harbor	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT STEVE BERGQUIST	07/13/2022	Monetary contributions to PAC or candidate	RENTON	WA	\$500.00	<a href="#">View Report</a>
CMTE TO ELECT STEVE THARINGER	09/27/2022	Monetary contributions to PAC or candidate	SEQUIM	WA	\$500.00	<a href="#">View Report</a>
KENNEDY FUND	10/13/2022	Monetary contributions to PAC or candidate	SEATTLE	WA	\$5,000.00	<a href="#">View Report</a>
LEADERSHIP COUNCIL	10/13/2022	Monetary contributions to PAC or candidate	OLYMPIA	WA	\$4,000.00	<a href="#">View Report</a>
REAGAN FUND	10/13/2022	Monetary contributions to PAC or candidate	OLYMPIA	WA	\$4,000.00	<a href="#">View Report</a>
TRUMAN FUND	10/13/2022	Monetary contributions to PAC or candidate	SEATTLE	WA	\$5,000.00	<a href="#">View Report</a>

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**Complaint Against: WA ACADEMY OF EYE PHYSICIANS & SURGEONS**

**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.640

**Background**

**Washington State’s Grassroots 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 grassroots lobbying campaigns. The public disclosure law was enacted through voter approval of Initiative 276 in 1972. A subsequent amendment to that law relating to grassroots lobbying was passed in 2023 when Governor Inslee signed HB 1317 into law.

Any person or entity making grassroots lobbying expenditures not reported by a registered lobbyist, a candidate, or a political committee exceeding \$1,500 in the aggregate in a one-month period or exceeding \$3,000 in the aggregate in any three-month period must register as a sponsor of a grassroots lobbying campaign.<sup>1</sup>

A campaign must register and file its initial grassroots lobbying report (PDC Form L-6) within 24 hours of the initial presentation to the public when that occurs during the period beginning 30 days before the regular legislative session through the end of that session, or during any special session. Any other time of the year, grassroots lobbying campaigns must register with the PDC within five days of the initial presentation to the public. Thereafter, sponsors file monthly reports on the 10th of the month covering the preceding calendar month.

**Violation**

The following grassroots lobbying reports appear to have been filed significantly late. The amount of activity reported on these forms consists of hundreds of thousands of dollars that were disclosed well after the applicable deadline. See table below.

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<sup>1</sup> <https://www.pdc.wa.gov/registration-reporting/lobbying/grassroots-lobbying>

<b>id</b>	<b>origin</b>	<b>election_year</b>	<b>receipt_date</b>	<b>report_from</b>	<b>report_to</b>	<b>url</b>
5003566.image	L6	2022	3/13/2024	11/1/2022	11/30/2022	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003566">https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003566</a>
5003567.image	L6	2022	3/13/2024	12/1/2022	12/31/2022	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003567">https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003567</a>
5003568.image	L6	2023	3/13/2024	1/1/2023	1/31/2023	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003568">https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003568</a>
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5003570.image	L6	2023	3/13/2024	3/1/2023	3/31/2023	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003570">https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003570</a>
5003571.image	L6	2023	3/13/2024	4/1/2023	4/30/2023	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003571">https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003571</a>
5003572.image	L6	2023	3/13/2024	5/1/2023	5/31/2023	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003572">https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003572</a>
5003573.image	L6	2023	3/13/2024	6/1/2023	6/30/2023	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003573">https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003573</a>
5003574.image	L6	2023	3/13/2024	7/1/2023	7/31/2023	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003574">https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003574</a>
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5003588.image	L6	2022	3/13/2024	10/1/2022	10/31/2022	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003588">https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003588</a>

## **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

## **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**