



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

**Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

March 4, 2025

Delivered electronically to Amy Fredericks on behalf of Physicians Eye PAC Washington Academy of Eye Physicians and Surgeons at [alf@wsma.org](mailto:alf@wsma.org)

Subject: PDC Case 164331 regarding Washington Academy of Eye Physicians and Surgeons PAC

Washington Academy of Eye Physicians and Surgeons PAC:

The Public Disclosure Commission (PDC) has completed its review of the complaint filed by Conner Edwards on November 4, 2024. The complaint alleged violations of RCW 42.17A.640 for failure to accurately report expenditures of a grassroots lobbying campaign.

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

- RCW 42.17A.640 requires sponsors of grassroots lobbying campaigns to file monthly reports with the PDC showing totals of expenditures made during the month.
- The Complaint alleged that you failed to timely report the L-6 reports for 2022 and 2023. PDC staff noted that you failed to file the monthly L-6 reports, as required by the statutory scheme.
- In reviewing the L-6 on file with the PDC for Physicians Eye PAC (Committee), staff noted that all 12 L-6 reports for 2022 and eight (8) L-6 reports for 2023 were all filed on March 12, 2024. These reports were required to be filed monthly.
- In your response, received on January 17, 2025, you noted that "The Washington Academy of Eye Physicians and Surgeons, WAEPS, opposed Senate Bill 5389 during the State of Washington 68<sup>th</sup> Legislature. WAEPS did not file the appropriate PDC form L6 during the actual campaign period, however as soon as WAEPS became aware of the requirement the forms were filed immediately. The L6 was not filed in a timely manner due to an administrative oversight."

Summary and Resolution

It appears that there was an oversight on the part of the Committee; however, while extremely late, the required L-6 reports were ultimately filed.

Based on these findings, the staff has determined that, in this instance, the Committee's failure to timely file the monthly required L-6 reports in 2022 and 2023, does not amount to a violation warranting further investigation.

However, pursuant to WAC 390-37-060(1)(d), Physicians Eye PAC will receive a formal written warning concerning its failure to file timely L-6 reports, as required by the statutory scheme. The committee officers will be informed the Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Accordingly, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

Any allegations regarding reporting by Physicians Eye PAC grassroots lobbying campaign that are not otherwise addressed herein are hereby dismissed.

If you have questions, you may contact Erick Agina, Compliance Officer, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

s/  
Erick O. Agina  
Compliance Officer

Endorsed by,

s/  
Peter Frey Lavalley  
Executive Director

cc: Conner Edwards