

Respondent Name
Friends of Community and Technical Colleges
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards reported via the portal (Mon, 21 Oct 2024 at 11:22 AM)</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Overcomplicated and outdated requirements that are difficult to understand and comply with.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>"Be the change that you wish to see in the world." — Mahatma Gandhi</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.



**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 • Website: www.pdca.wa.gov

October 17, 2024

Delivered electronically to Friends of Community and Technical Colleges at
friendsofctcs@gmail.com

Subject: Complaint filed by Conner Edwards, PDC Case 160719

Dear Friends of Community and Technical Colleges:

Below is a copy of an electronic letter sent to Conner Edwards concerning a complaint filed with the Public Disclosure Commission (PDC).

This letter is to notify you about the resolution for PDC Case 160719.

As noted in the letter to Conner Edwards the PDC has dismissed these matters following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in these matters.

PDC staff is reminding you to submit C-4 expenditure reports by the expedited deadlines in RCW 42.17A.235 when you have engaged in activity supporting candidates on the primary ballot. For more information on how to update your reporting date settings if you are using ORCA, please see our tutorial [here](#).

If you still require assistance or have any questions regarding how to avoid this issue in the future, please contact our Filer Assistance team by e-mail at pdcc@pdcc.wa.gov or by calling (360)753-1111 and selecting option 3.

If you have questions, you may contact JORDAN CAMPBELL by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Electronically signed

JORDAN CAMPBELL
Compliance Coordinator

Endorsed by,

/s/ Electronically signed

Kim Bradford
Deputy Director
For Peter Frey Lavallee
Deputy Director



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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October 17, 2024

Delivered electronically to Conner Edwards, cg.edwards53@gmail.com

Subject: Complaint against Friends of Community and Technical Colleges, PDC Case 160719

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaints you filed on August 9, 2024. The complaints alleged that Friends of Community and Technical Colleges, a Political Action Committee participating in the 2024 Election, may have violated the following:

1. RCW 42.17A.235 for failure to timely file the 21-day and 7-day reports during an election in which they were participating.

PDC staff reviewed the allegation; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by the Respondent; and other relevant information, to determine whether the record supports a finding of one or more violations.

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

- RCW 42.17A.235(2) states "Each treasurer of a candidate or political committee, or an incidental committee, required to file a statement of organization under this chapter, shall file with the commission a report, for each election in which a candidate, political committee, or incidental committee is participating, containing the information required by RCW 42.17A.240 at the following intervals:
 - On the twenty-first day and the seventh day immediately preceding the date on which the election is held.
- RCW 42.17A.005(38) defines participation to include:
 - Making either a monetary or in-kind contribution to a candidate; and
 - Making an independent expenditure or electioneering communication in support of or opposition to a candidate.

- The Respondent submitted an expenditure report for its July expenses by Aug. 10, the deadline for committee reporting monthly.

As noted in the letter to Conner Edwards the PDC has dismissed this matter following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in these matters.

PDC staff is reminding the Respondent to submit C-4 expenditure reports by the expedited deadlines in RCW 42.17A.235 when it has engaged in activity supporting candidates on the primary ballot.

The PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, you may contact JORDAN CAMPBELL by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Electronically signed

JORDAN CAMPBELL
Compliance Coordinator

Endorsed by,

/s/ Electronically signed

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: Friends of Community and Technical Colleges

FRIENDS OF COMMUNITY AND
TECHNICAL COLLEGES

2024

OverviewContributionsExpendituresPledgesDebtsLoans

Committee Overview

Registered June 27, 2016

Other

Treasurer is MARTY BROWN

Committee Contact

2103 HARRISON AVE. NW #2-839
OLYMPIA, WA 98502

friendsofctcs@gmail.com

360-292-8935

Financial Overview

\$8,555.95

Starting balance

+

\$8,790.00

Contributions

+

\$0.00

Loans

=

\$17,345.95

Total raised

\$12,119.93

Total spent

\$0.00

Pledges

\$0.00

Debt

Committee Reports and Forms

Registration Form

Contributors and Vendors Map

Made to committee for 2024

Contributions

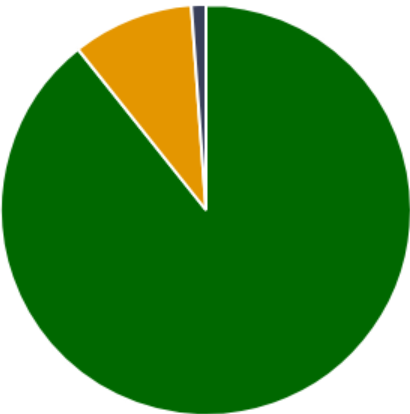
See who has contributed cash and in-kind (non-monetary) contributions to the committee..

Contributions made to committee for 2024

Individual
\$7,850.00

Other
\$840.00

Political Action Committee
\$100.00



Made by committee for 2024

Expenditures

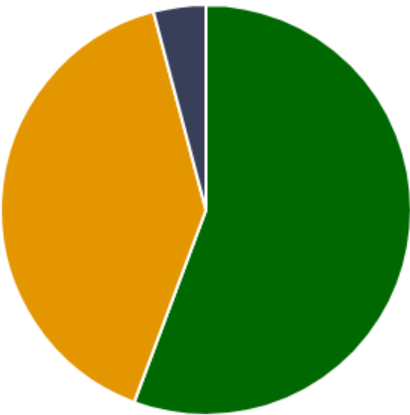
See how the committee has spent money, and what kind of goods and services it received as in-kind contributions.

Expenditures made by candidate for 2024

Monetary contributions to PAC...
\$6,750.00

Not Provided
\$4,869.93

Charity
\$500.00



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

100

 entries

[Download 50 rows as CSV.](#)

Period	Report Number	Filed	Report	Form Type	Election Year
10/08/2024 - 10/08/2024	110250305	10/08/2024	View Report	C3	2024
09/30/2024 - 09/30/2024	110248257	09/30/2024	View Report	C3	2024
09/01/2024 - 09/30/2024	110248258	09/30/2024	View Report	C4	2024
08/20/2024 - 08/20/2024	110239427	08/20/2024	View Report	C3	2024
08/14/2024 - 08/14/2024	110238403	08/14/2024	View Report	C3	2024
08/01/2024 - 08/31/2024	110244856	09/11/2024	View Report	C4	2024
07/27/2024 - 07/27/2024	110232639	07/27/2024	View Report	C3	2024
07/23/2024 - 07/23/2024	110232164	07/23/2024	View Report	C3	2024
07/23/2024 - 07/23/2024	110232206	07/23/2024	View Report	C3	2024
07/22/2024 - 07/22/2024	110231601	07/22/2024	View Report	C3	2024
07/15/2024 - 07/15/2024	110229163	07/15/2024	View Report	C3	2024
07/06/2024 - 07/06/2024	110226984	07/06/2024	View Report	C3	2024
07/03/2024 - 07/03/2024	110226434	07/03/2024	View Report	C3	2024

Period	Report Number	Filed	Report	Form Type	Election Year
07/03/2024 - 07/03/2024	110226546	07/03/2024	View Report	C3	2024
07/01/2024 - 07/31/2024	110237004	08/09/2024	View Report	C4	2024
06/26/2024 - 06/26/2024	110224878	06/26/2024	View Report	C3	2024
06/20/2024 - 06/20/2024	110223788	06/20/2024	View Report	C3	2024
06/15/2024 - 06/15/2024	110222853	06/15/2024	View Report	C3	2024
06/13/2024 - 06/13/2024	110222515	06/13/2024	View Report	C3	2024
06/12/2024 - 06/12/2024	110222389	06/12/2024	View Report	C3	2024
06/10/2024 - 06/10/2024	110222296	06/11/2024	View Report	C3	2024
06/01/2024 - 06/30/2024	110226436 Amended by: 110226810	07/03/2024	View Report	C4	2024
06/01/2024 - 06/30/2024	110226810 Amended by: 110226961	07/05/2024	View Report	C4 - Amended	2024
06/01/2024 - 06/30/2024	110226961 Amended by: 110227002	07/05/2024	View Report	C4 - Amended	2024
06/01/2024 - 06/30/2024	110227002	07/06/2024	View Report	C4 - Amended	2024
05/19/2024 - 05/19/2024	110216033	05/19/2024	View Report	C3	2024
05/17/2024 - 05/17/2024	110215955	05/17/2024	View Report	C3	2024
05/13/2024 - 05/13/2024	110215418	05/13/2024	View Report	C3	2024
05/08/2024 - 05/08/2024	110213402	05/08/2024	View Report	C3	2024
05/02/2024 - 05/02/2024	110211873	05/02/2024	View Report	C3	2024
05/02/2024 - 05/02/2024	110211941	05/02/2024	View Report	C3	2024
05/01/2024 - 05/31/2024	110219795 Amended by: 110226808	06/08/2024	View Report	C4	2024
05/01/2024 - 05/31/2024	110226808 Amended by: 110226960	07/05/2024	View Report	C4 - Amended	2024
05/01/2024 - 05/31/2024	110226960 Amended by: 110227001	07/05/2024	View Report	C4 - Amended	2024
05/01/2024 - 05/31/2024	110227001	07/06/2024	View Report	C4 - Amended	2024
04/29/2024 - 04/29/2024	110211401	04/29/2024	View Report	C3	2024
04/26/2024 - 04/26/2024	110211253	04/26/2024	View Report	C3	2024
04/26/2024 - 04/26/2024	110211255	04/26/2024	View Report	C3	2024
04/01/2024 - 04/30/2024	110213403 Amended by: 110226806	05/08/2024	View Report	C4	2024
04/01/2024 - 04/30/2024	110226806 Amended by: 110226959	07/05/2024	View Report	C4 - Amended	2024
04/01/2024 - 04/30/2024	110226959 Amended by: 110227000	07/05/2024	View Report	C4 - Amended	2024

Period	Report Number	Filed	Report	Form Type	Election Year
04/01/2024 - 04/30/2024	110227000	07/06/2024	View Report	C4 - Amended	2024
02/01/2024 - 03/31/2024	110204074 Amended by: 110226804	03/09/2024	View Report	C4	2024
02/01/2024 - 03/31/2024	110226804 Amended by: 110226958	07/05/2024	View Report	C4 - Amended	2024
02/01/2024 - 03/31/2024	110226958 Amended by: 110226999	07/05/2024	View Report	C4 - Amended	2024
02/01/2024 - 03/31/2024	110226999	07/06/2024	View Report	C4 - Amended	2024
01/01/2024 - 01/31/2024	110200717 Amended by: 110226802	02/09/2024	View Report	C4	2024
01/01/2024 - 01/31/2024	110226802 Amended by: 110226957	07/05/2024	View Report	C4 - Amended	2024
01/01/2024 - 01/31/2024	110226957 Amended by: 110226998	07/05/2024	View Report	C4 - Amended	2024
01/01/2024 - 01/31/2024	110226998	07/06/2024	View Report	C4 - Amended	2024

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FILE ONLINE

Complaint Against: FRIENDS OF COMMUNITY AND TECHNICAL COLLEGES

Submitted: 10/21/24

Notice to Respondent by: 10/31/24 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 1/19/25 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.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

When a political committee makes an expenditure benefitting a candidate appearing on the general election ballot or donates to a committee whose spending benefits a candidate appearing on the general election ballot, the committee becomes obligated to file reports on the same schedule that those candidates must follow.³

Reporting History of Respondent

In the last several weeks, I filed a complaint against this respondent which demonstrated that they failed to submit the required C3/C4 reports that were due according to the reporting schedule they were obligated to follow because of their participation in the primary general election.

Despite the fact that the complaint I filed contained clear evidence that these respondents failed to file reports by the required deadlines, the agency staff dismissed these complaints with so-called "reminder" letters.

The use of reminder letter dismissals (as opposed to warning letter dismissals) to dismiss complaints which accurately identify violations is a cynical misuse of the staff's enforcement powers.

Let me be clear: I don't believe that this filer intentionally failed to file the required reports by the appropriate deadline. However, regardless of their intent, the failure to file reports by the appropriate deadline is a violation.

PDC staff have long known that there is an issue with committees in our state filing reports on the appropriate schedule. Rather than admit the existence of this problem and work with stakeholders

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>

³ See RCW 42.17A.235(2) and RCW 42.17A.005(38)

to come up with a solution that would solve this problem, the PDC staff have chosen to bury the problem under the rug with a mountain of “reminder” and “warning” letter dismissals.

This must change.

Violations

The above referenced respondent “participated” in the 2024 general election by virtue of the expenditures that they made. See URLs listed below and also RCW 42.17A.005(38). As such, this committee was obligated to file a 21-day C4 report by the 10/15/24 deadline.

The respondent failed to do so, despite having received a reminder letter only a few days prior. See attached.

###

Report evidencing FRIENDS OF COMMUNITY AND TECHNICAL COLLEGES participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110248258>

###

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/>

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— Mahatma Gandhi