

<b>Respondent Name</b>
Evergreen Recycling Refund Coalition
<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 2:05 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Overcomplicated and outdated requirements that are difficult to understand and comply with.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.



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Financial Statements

LobbyistsLobbyist ReportingLobbyist ClientsPublic Agency Lobbying

Learn what businesses and organizations reported spending on lobbying activity. Lobbyist clients, or employers, report annually.

Results for:

Lobbying Client: Evergreen Recycling X

Hide FiltersSearch Tips

Lobbying Client

Evergreen RecyclingX

Year

SelectX

Show 50 entries

Download 0 rows as CSV.

Lobbying Client	Year	Email	Compensation	Expenditures	Contributions	Total Expenses	Report
No matching records found							

Showing 0 to 0 of 0 entries (filtered from 12,571 total entries)

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PUBLIC DISCLOSURE COMMISSION

711 CAPITOL WAY RM 206  
PO BOX 40908  
OLYMPIA WA 98504-0908  
(360) 753-1111  
TOLL FREE 1-877-601-2828

GRASS ROOTS  
LOBBYING

PDC FORM

L-6

(9/23)

THIS SPACE FOR OFFICE USE



Sponsor's name **Evergreen Recycling Refund Coalition**

Address **119 First Ave. S**

City **Seattle**

State **WA**

Zip **98104**

Telephone  
**(206) 260-2558**

1. Describe the topic(s) or legislation about which the campaign is conducted. Include bill, rule, rate, standard number, if any.

**Recycling Policy, Beverage Container Recycling, Deposit Return Systems**

3. List the principal officers of the group or organization if the sponsor is a business, union, association, political organization or other entity.

NAME

TITLE

ADDRESS

2. This report covers:

☐ Registration  
(Initial report)

☒ Monthly report  
From 1/1/24 To 1/31/24

☐ Final report  
(Campaign is ended)

4. Who is organizing or managing the campaign? List persons or firms hired to assist in the campaign, including public relations and advertising agents.

NAME AND ADDRESS

OCCUPATION OR BUSINESS

TERMS OF COMPENSATION

Quinn Thomas 119 First Ave. S Seattle, WA 98104

Public Relations

Retainer

DHM Research 119 First Ave. S Seattle, WA 98104

Public Opinion Research

Project Fee

5. Expenditures Made Or Incurred In The Campaign:

1. Previous expenditures (from line 4, last L-6 report)

\$ **196,500**

2. Expenses this reporting period:

\$

A. Radio

B. Television

C. Newspapers, magazines

D. Brochures, signs

**\$135**

E. Printing and mailing

F. Consultants, public relations

**\$60,750**

G. Office expense, travel, salaries

**\$911.60**

H. Contributions

I. Entertainment

J. Other expenses

**\$36,500 (digital advertising)**

3. Total expenditures this period (lines 2a-2j)

\$ **98,296.60**

4. Total expenditures in the campaign (lines 1 + 3)

\$ **294,796.60**

Continue On Reverse

List each person or organization who has contributed \$25 or more during this report period

[illegible]

<b>List Total Amount From Any Attached Pages.....</b>	<b>\$</b>
<b>Total Amount Received in Contributions Less Than \$25 Where Contributor's Name Is Not Listed.....</b>	<b>0</b>
<b>Total Contributions This Period.....</b>	<b>20,000</b>
<b>Total Contributions During The Campaign.....</b>	<b>318,000</b>

**CERTIFICATION:** I hereby certify under penalty of perjury that the information contained in this report is true and correct to the best of my knowledge.

**Name and title**

Signature \_\_\_\_\_

Date \_\_\_\_\_

Name and title  
Rick Thomas, Coalition Manager

Signature Hubert Le

2/5/24

## INSTRUCTIONS

**WHO SHOULD FILE THIS FORM:** Any person or entity making grassroots lobbying expenditures not reported by a registered lobbyist, a candidate, or a political committee exceeding \$700 in the aggregate in a one-month period or exceeding \$1,400 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.

**FILING DEADLINE:** A campaign must register and file its initial grassroots lobbying report 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.

**SEND REPORT TO:**

**Public Disclosure Commission  
711 Capitol Way, Rm 206  
PO Box 40908  
Olympia, WA 98504-0908**

### QUESTIONS:

**CALL (360) 753-1111, OR TOLL FREE 1-877-601-2828**



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Results for:

Committee Name: Evergreen Recycling ✕

Hide Filters Search Tips

Committee Name

Evergreen Recycling

X

Committee Category

Select

X

Election Year

Select

X

Jurisdiction

Enter text

X

County

Enter text

X

Ballot Prop. Number

Enter text

X

Show 25 entries

Download 0 rows as CSV.

Name	Election Year	Committee Category	Raised	Spent	Debt	County	Jurisdiction	Ballot Prop.
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No matching records found

Showing 0 to 0 of 0 entries (filtered from 17,956 total entries)

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**Complaint Against: Evergreen Recycling Refund Coalition**

**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, see WAC 390-20-125

**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.

Additionally, the PDC recently implemented WAC 390-20-125, which requires (among other things) the sponsors of grassroots lobbying campaigns to itemize expenditures. These expenses are of particular public interest as they relate to outreach efforts that members of the public will directly experience.

**Violation**

On February 6, 2024, the Evergreen Recycling Refund Coalition filed this L6 report, see link: <https://web.pdc.wa.gov/rptimg/default.aspx?docid=5003432>

There are a number of deficiencies with this report.

First, the name of a contributor donating \$20,000 is partially cut off by the poor quality of the scanned image. If the report was physically mailed to the PDC, this may be the fault of PDC staff and not the reporting entity.

Second, none of the expenditures made by the grassroots lobbying sponsor have been itemized. WAC 390-20-125(4) requires that: "Expenditures made on behalf of a grass roots lobbying campaign

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

must be reported by financial category, pursuant to RCW 42.17A.640(2), with sufficient detail and itemization to provide the public a reasonable understanding of the nature and scope of the expenditure...”

The rule language goes on to require that the run date of advertising be disclosed as well as the name and address of vendors. The rule language also goes on to state that for payments to consultants that “[a]ny contractual or other payments made to any professional service provider, or other third party, for campaign purposes must be reported, including the name and address of the provider and a description of the services provided.” This hasn’t been done.

The itemization and details relating to these expenditures are of particular public interest as they relate to outreach efforts that members of the public directly experienced.

Finally, I suspect that this report was not filed within 24 hours of the initial presentation to the public as required by law. However, because the run dates have not been provided by the sponsor it is impossible to tell with any certainty.

### **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

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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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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.

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