

Respondent Name
Snohomish Ebony PAC (SEPAC)
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards reported via the portal (Wed, 9 Oct 2024 at 12:02 PM)</p> <p>Description of Complaint</p> <p>See attached complaint.</p> <p><u>Notice to Respondent</u></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Overcomplicated and outdated requirements that are difficult to understand and comply with.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 filers 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?
The PDC has an obligation to provide transparency to the voters by enforcing filing requirements. The agency's failure to actively monitor the filings of committees and enforce filing requirements damages both the public and the candidates themselves.
List of attached evidence or contact information where evidence may be found
PDC Website.
List of potential witnesses with contact information to reach them
See respondent contact info on 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.

Snohomish Ebony PAC (SEPAC) - 2024

Committee Information

Registration

February 05, 2020

Treasurer

Felicia Carnes
P.O. Box 977
Mukilteo, WA, 98275
6012015080

Political Committee Type

Other

Jurisdiction

None reported.

Committee Address

P.O. Box 977
Mukilteo, WA 98275

Phone

6012015080

Email

info@snoebonypac.com

Financial Information

Campaign Starting Balance

\$13,604.75

Contributions Amount

\$1,435.00

Loans Amount

\$0.00

Total Receipts

\$15,039.75

Expenditures

\$3,801.71

Pledges

\$0.00

Debts

\$0.00

Made to committee for 2024

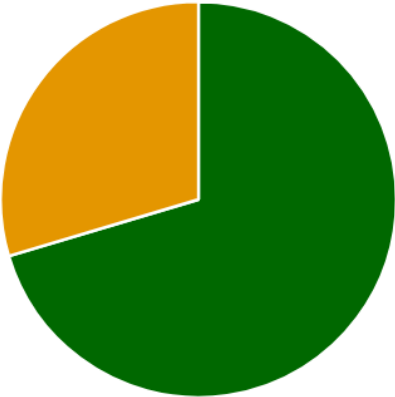
Contributions

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

Contributions made to committee for 2024

Individual
\$1,010.00

Other
\$425.00



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 committee for 2024

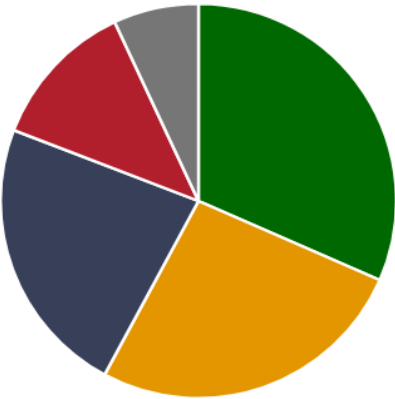
Monetary contributions to PAC...
\$1,200.00

Other
\$1,000.00

Not Provided
\$873.19

Utilities, phone, and other...
\$464.10

Miscellaneous
\$264.42



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 50 entries

Download 42 rows as CSV.

Period	Report Number	Filed	Report	Form Type	Election Year
01/01/2024 - 01/31/2024	110200488	02/08/2024	View Report	C4	2024
01/05/2024 - 01/05/2024	110200483	02/08/2024	View Report	C3	2024
01/29/2024 - 01/29/2024	110200485	02/08/2024	View Report	C3	2024
02/01/2024 - 02/29/2024	110203112	03/03/2024	View Report	C4	2024
02/07/2024 - 02/07/2024	110200489	02/08/2024	View Report	C3	2024
02/08/2024 - 02/08/2024	110200490	02/08/2024	View Report	C3	2024
02/09/2024 - 02/09/2024	110200484	02/08/2024	View Report	C3	2024
02/19/2024 - 02/19/2024	110200487	02/08/2024	View Report	C3	2024
02/22/2024 - 02/22/2024	110202455	02/25/2024	View Report	C3	2024
02/28/2024 - 02/28/2024	110203111	03/03/2024	View Report	C3	2024
03/01/2024 - 03/31/2024	110207242	04/02/2024	View Report	C4	2024
03/06/2024 - 03/06/2024	110204039	03/09/2024	View Report	C3	2024
03/08/2024 - 03/08/2024	110204040	03/09/2024	View Report	C3	2024
03/20/2024 - 03/20/2024	110206893	03/31/2024	View Report	C3	2024

Period	Report Number	Filed	Report	Form Type	Election Year
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04/01/2024 - 04/30/2024	110211752	05/01/2024	View Report	C4	2024
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04/29/2024 - 04/29/2024	110211750	05/01/2024	View Report	C3	2024
05/01/2024 - 05/31/2024	110218240	06/03/2024	View Report	C4	2024
05/07/2024 - 05/07/2024	110213641	05/09/2024	View Report	C3	2024
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06/01/2024 - 07/15/2024	110229968	07/16/2024	View Report	C4	2024
06/05/2024 - 06/05/2024	110220180	06/09/2024	View Report	C3	2024
06/10/2024 - 06/10/2024	110223628	06/18/2024	View Report	C3	2024
06/20/2024 - 06/20/2024	110225220	06/30/2024	View Report	C3	2024
06/27/2024 - 06/27/2024	110225219	06/30/2024	View Report	C3	2024
07/08/2024 - 07/08/2024	110227925	07/09/2024	View Report	C3	2024
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07/19/2024 - 07/19/2024	110231239	07/19/2024	View Report	C3	2024
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09/19/2024 - 09/19/2024	110247365	09/25/2024	View Report	C3	2024
10/07/2024 - 10/07/2024	110250241	10/08/2024	View Report	C3	2024

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Snohomish Ebony PAC (SEPAC) - 2023

Committee Information

Registration

February 05, 2020

Treasurer

Felicia Carnes
P.O. Box 977
Mukilteo, WA, 98275
6012015080

Political Committee Type

Other

Jurisdiction

None reported.

Committee Address

P.O. Box 977
Mukilteo, WA 98275

Phone

6012015080

Email

info@snoebonypac.com

Financial Information

Campaign Starting Balance

\$5,236.09

Contributions Amount

\$27,445.00

Loans Amount

\$0.00

Total Receipts

\$32,681.09

Expenditures

\$18,825.79

Pledges

\$0.00

Debts

\$0.00

Made to committee for 2023

Contributions

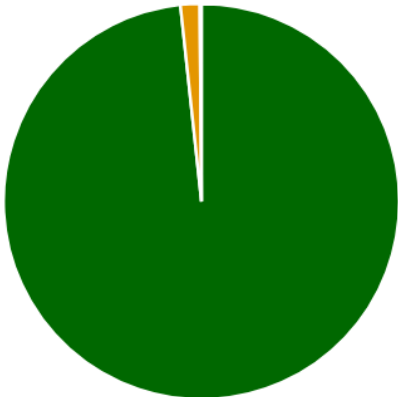
See who has contributed cash and in-kind (non-monetary) contributions to the committee.

Contributions made to committee for 2023

Individual
\$27,050.00

Business
\$432.00

Other
\$-37.00



Made by committee for 2023

Expenditures

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

Expenditures made by committee for 2023

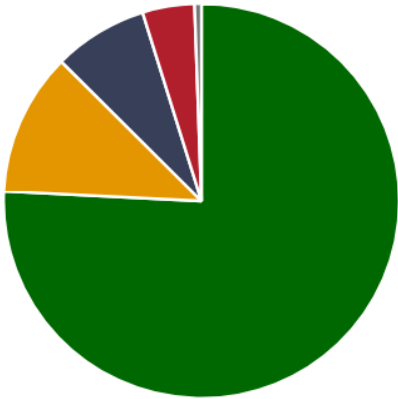
Independent Expenditure
\$14,269.50

Monetary contributions to PAC...
\$2,200.00

Other
\$1,451.00

Utilities, phone, and other...
\$799.94

Miscellaneous
\$105.35



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 70 rows as CSV.

Period	Report Number	Filed	Report	Form Type	Election Year
12/28/2023 - 12/28/2023	110195575	01/05/2024	View Report	C3	2023
12/20/2023 - 12/20/2023	110194614	12/27/2023	View Report	C3	2023
12/08/2023 - 12/08/2023	110194613	12/27/2023	View Report	C3	2023
12/07/2023 - 12/07/2023	110194612	12/27/2023	View Report	C3	2023
12/06/2023 - 12/06/2023	110194611	12/27/2023	View Report	C3	2023
12/01/2023 - 12/31/2023	110195577	01/05/2024	View Report	C4	2023
11/29/2023 - 11/29/2023	110190620 Amended by: 110194610	12/03/2023	View Report	C3	2023
11/29/2023 - 11/29/2023	110194610	12/27/2023	View Report	C3 - Amended	2023
11/27/2023 - 11/27/2023	110190619	12/03/2023	View Report	C3	2023
11/09/2023 - 11/09/2023	110188692	11/12/2023	View Report	C3	2023
11/09/2023 - 11/09/2023	110190618	12/03/2023	View Report	C3	2023
11/08/2023 - 11/08/2023	110188691	11/12/2023	View Report	C3	2023
11/07/2023 - 11/07/2023	110188690	11/12/2023	View Report	C3	2023
11/01/2023 - 11/30/2023	110190621	12/03/2023	View Report	C4	2023

Period	Report Number	Filed	Report	Form Type	Election Year
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06/22/2023 - 06/22/2023	110164263	08/06/2023	View Report	C3	2023
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Period	Report Number	Filed	Report	Form Type	Election Year
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05/10/2023 - 05/10/2023	110164258	08/06/2023	View Report	C3	2023
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05/05/2023 - 05/05/2023	110164256	08/06/2023	View Report	C3	2023
05/01/2023 - 05/31/2023	110164272	08/06/2023	View Report	C4	2023
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04/12/2023 - 04/12/2023	110164254	08/06/2023	View Report	C3	2023
04/10/2023 - 04/10/2023	110164253	08/06/2023	View Report	C3	2023
04/07/2023 - 04/07/2023	110164252	08/06/2023	View Report	C3	2023
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03/21/2023 - 03/21/2023	110140144	03/28/2023	View Report	C3	2023
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03/08/2023 - 03/08/2023	110140145	03/28/2023	View Report	C3	2023
03/07/2023 - 03/07/2023	110140142	03/28/2023	View Report	C3	2023
03/01/2023 - 03/31/2023	110140148	03/28/2023	View Report	C4	2023
02/22/2023 - 02/22/2023	110140141	03/28/2023	View Report	C3	2023
02/13/2023 - 02/13/2023	110140140	03/28/2023	View Report	C3	2023
02/08/2023 - 02/08/2023	110140139	03/28/2023	View Report	C3	2023
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01/05/2023 - 01/05/2023	110140133	03/28/2023	View Report	C3	2023
01/01/2023 - 01/31/2023	110140146	03/28/2023	View Report	C4	2023

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Snohomish Ebony PAC (SEPAC) - 2022

Committee Information

Registration

February 05, 2020

Treasurer

Felicia Carnes
P.O. Box 977
Mukilteo, WA, 98275
6012015080

Political Committee Type

Other

Jurisdiction

None reported.

Committee Address

P.O. Box 977
Mukilteo, WA 98275

Phone

6012015080

Email

info@snoebonypac.com

Financial Information

Campaign Starting Balance

\$5,895.16

Contributions Amount

\$3,673.74

Loans Amount

\$0.00

Total Receipts

\$9,568.90

Expenditures

\$4,332.81

Pledges

\$0.00

Debts

\$0.00

Made to committee for 2022

Contributions

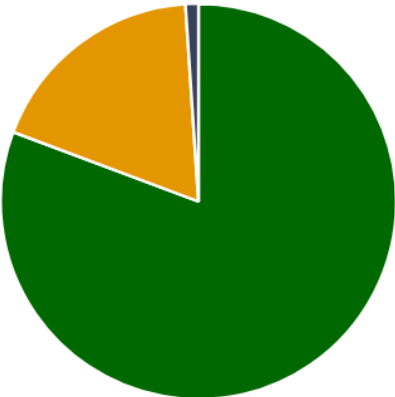
See who has contributed cash and in-kind (non-monetary) contributions to the committee.

Contributions made to committee for 2022

Individual
\$2,965.00

Other
\$670.05

Business
\$38.69



Made by committee for 2022

Expenditures

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

Expenditures made by committee for 2022

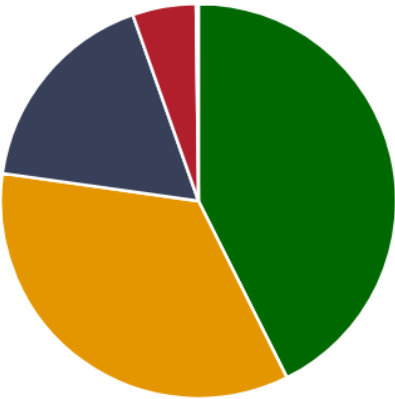
Fundraising events and related...
\$1,846.87

Monetary contributions to PAC...
\$1,500.00

Utilities, phone, and other...
\$752.33

Not Provided
\$225.10

Bank and payment processing...
\$8.51



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 entries

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12/21/2022 - 12/21/2022	110136179	02/11/2023	View Report	C3	2022
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12/07/2022 - 12/07/2022	110128464	12/08/2022	View Report	C3	2022
12/02/2022 - 12/02/2022	110128465	12/08/2022	View Report	C3	2022
12/01/2022 - 12/31/2022	110136180	02/11/2023	View Report	C4	2022
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11/09/2022 - 11/09/2022	110128460	12/08/2022	View Report	C3	2022
11/07/2022 - 11/07/2022	110128458	12/08/2022	View Report	C3	2022
11/01/2022 - 11/30/2022	110128470	12/08/2022	View Report	C4	2022
10/30/2022 - 10/30/2022	110117132 Amended by: 110117133	10/08/2022	View Report	C3	2022
10/19/2022 - 10/19/2022	110122349	10/25/2022	View Report	C3	2022
10/18/2022 - 10/31/2022	110128468	12/08/2022	View Report	C4	2022

Period	Report Number	Filed	Report	Form Type	Election Year
10/13/2022 - 10/13/2022	110122348	10/25/2022	View Report	C3	2022
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08/30/2022 - 08/30/2022	110117133	10/08/2022	View Report	C3 - Amended	2022
08/29/2022 - 08/29/2022	110117131	10/08/2022	View Report	C3	2022
08/19/2022 - 08/19/2022	110109863	09/03/2022	View Report	C3	2022
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05/18/2022 - 05/18/2022	110086781	05/18/2022	View Report	C3	2022
05/10/2022 - 05/10/2022	110086782	05/18/2022	View Report	C3	2022
05/09/2022 - 05/09/2022	110086783	05/18/2022	View Report	C3	2022
05/05/2022 - 05/05/2022	110086789	05/18/2022	View Report	C3	2022
05/01/2022 - 05/31/2022	110095834	07/01/2022	View Report	C4	2022
04/20/2022 - 04/20/2022	110086788	05/18/2022	View Report	C3	2022
04/11/2022 - 04/11/2022	110086787	05/18/2022	View Report	C3	2022
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04/07/2022 - 04/07/2022	110086785	05/18/2022	View Report	C3	2022
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04/01/2022 - 04/30/2022	110086790	05/18/2022	View Report	C4	2022
03/21/2022 - 03/21/2022	110081602	04/16/2022	View Report	C3	2022
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03/07/2022 - 03/07/2022	110076842	03/10/2022	View Report	C3	2022
03/05/2022 - 03/05/2022	110076840	03/10/2022	View Report	C3	2022
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02/18/2022 - 02/18/2022	110076824	03/10/2022	View Report	C3	2022
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01/20/2022 - 01/20/2022	110072959	02/09/2022	View Report	C3	2022
01/10/2022 - 01/10/2022	110072958	02/09/2022	View Report	C3	2022

Period	Report Number	Filed	Report	Form Type	Election Year
01/07/2022 - 01/07/2022	110072956	02/09/2022	View Report	C3	2022
01/05/2022 - 01/05/2022	110072955	02/09/2022	View Report	C3	2022
01/01/2022 - 01/31/2022	110073824	02/11/2022	View Report	C4	2022

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Complaint Against Snohomish Ebony PAC
Submitted 10/9/24
Statutes Violated: RCW 42.17A.235, .240

2022

In 2022, this respondent made contributions to candidates appearing on the primary and general ballot, see link: <https://pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2022-24888/expenditures?description=contributions>

Despite this, the committee filed its post-primary C4 more than a month late, see link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110117135>

The 21-day C4 was filed approximately 7 days late, see link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110122350>

The 7-day C4 was filed approximately one month late (and filed after the election was already over when it should have been filed before the election). See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110128468>

The December 2022 C4 was also filed approximately one month late, see link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110136180>

2023

In 2023, this committee received a warning letter for failing to timely file C3 and C4 reports, see link: <https://pdc-case-tracking.s3.us-gov-west-1.amazonaws.com/6286/144427%20Snohomish%20Ebony%20PAC%20SOU%20Warning%20Return%20Ltr.pdf>

The committee also failed to disclose the quantity of printed pieces, and the name of the candidate or candidate(s) benefited by the below “independent expenditures”, see WAC 390-16-037 and below:

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Taradel	10/09/2023	Independent Expenditure in Everett	Glen Allen	VA	\$7,953.12	View Report
Taradel	10/11/2023	Independent Expenditure in Lake Stevens	Glen Allen	VA	\$6,316.38	View Report

2024

On the respondent’s final C4 covering December 2023, the committee disclosed an ending cash on hand balance of \$13,855.30. See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110195577>

However, on the committee's opening C4 for January of 2024, the committee disclosed an opening cash on hand balance of \$13,604.75. See link:

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110200488>

There is no explanation provided for this discrepancy, which suggests incomplete reporting.

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 filers 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.

“Be the change that you wish to see in the world.”

— Mahatma Gandhi