



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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Subject: PDC Case 169481 regarding Together for Pierce County

Dear Together for Pierce County:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on December 16, 2024. The complaint alleged violations of RCW 42.17A.235 and .240 by failing to timely and accurately disclose contributions and expenditures on reports for election year 2024.

Specifically, Mr. Edwards alleged that Together for Pierce County failed to timely report \$12,500 in monetary contributions received on a C-3 report and file a post-General C-4 report. The complaint also alleged the committee's reporting was incomplete based upon 1) a lack of reports filed for election year 2021 through approximately the first half of August, 2024; and 2) the difference between the committee's ending balance for 2020 and their beginning balance for 2024.

Applicable Laws and Rules

- [RCW 42.17A.205](#) requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report). A committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the committee's election participation, and their financial activity.
- Pursuant to RCW 42.17A.235(3)(a), each treasurer of a political committee is required to file a report on the tenth day of each month during which they are not participating in an election campaign only if the committee 1) received a contribution or made an expenditure in the preceding calendar month; and 2) either total contributions received or total expenditures made since the last such report exceed \$750¹.

¹ Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

- Pursuant to RCW 42.17A.235(10), amended C-3 and C-4 reports should be submitted within 21 days of filing the original report. If there is no pending complaint about the report being amended and it meets the conditions set forth in .235(10)(a) through (d), it is not evidence of a violation to submit an amended report within 21 days of the original report.
- Per [RCW 42.17A.265](#), contributions of \$1,500 or more (aggregate) given or received within 7 days of a Primary Election or 21 days of a General Election must be disclosed by each party on an LMC report, a C-3 report, or a C-4 report filed within 24 hours (by the contributor) or 48 hours (by the recipient). LMC reports may be submitted on the first working day after the 24/48-hour deadline, if needed. Contributions disclosed on LMC reports must also be disclosed or appear on other required reports (e.g. C-3, C-4).

Background and Findings

- Together for Pierce County (the “Respondent”) is a single election political committee that registered with the PDC for election year 2024 on August 13, 2024 and selected the Full Reporting option. The committee indicated their support for candidates Ryan N. Mello and Jani G. Hitchen in election year 2024. The committee was also registered as a single election political committee in 2020.
- The Respondent first replied to the complaint on April 11, 2025 and provided a written response on April 22, 2025. In their response, the committee acknowledged they failed to timely 1) disclose two contributions (\$7,500 and \$5,000 respectively) that were received prior to the election; and 2) file their post-General election C-4 report. They said they sincerely regretted the error. The Respondent also indicated that their committee ceased operating after the 2020 election and had no activity to report between December, 2020 and August, 2024. The Treasurer of the 2024 committee was not aware of the existence of the previous committee from 2020 or their bank account balance of \$1,520, which is why she entered a zero-dollar starting balance for the new 2024 committee. The Respondent expressed a willingness to take the necessary actions to remedy the difference between the ending and starting balances of the two committees.
 - The committee stated the two contributions totaling \$12,500 were required to be disclosed on a C-3 report that was due one day before the election (11/4/24) and that it was therefore reasonable to believe the delay had no substantial impact on the information available to voters prior to the election.
 - The Respondent said its post-election C-4 report involved relatively small resources and indicated its belief that the minor delay in filing (of less than one week) had no impact on the election as it did not deprive voters of information prior to the election.
- On May 15, 2025, the Respondent amended its first C-4 report for 2024 to reflect a Previous total cash and in-kind contributions carryforward dollar amount of \$1,520.01, which matches the ending Cash on hand dollar amount reported on the 2020 committee’s last C-4 report.

- Throughout our assessment, the Respondent was responsive to PDC requests and worked with PDC staff to quickly resolve the difference in its carry-forward amount. A summary of our findings is below.
- The Respondent does not have previous warnings/violations of PDC requirements.

Allegation: Late Reports (2024)

- The committee's C-3 report disclosing a deposit, dated 10/30/24, in the amount of \$12,500 was filed 42 days late, after the 2024 General Election. The deposit was comprised of a \$5,000 contribution from Firefighters Action Support Team (Fast PAC) and a \$7,500 contribution from Active in Democracy Tacoma Firefighters Union.
 - The lateness of the C-3 report deprived the public of timely and accurate information during a time-sensitive period before the election, which is an aggravating factor.
 - However, the late report is partially mitigated by the fact that the committees who made the contributions timely disclosed them prior to the election, which made the information available to the public in some form. Firefighters Action Support Team (Fast PAC) and Active in Democracy Tacoma Firefighters Union both disclosed the contributions made to the Respondent on Last Minute Contribution (LMC) reports that were filed the same day they were disbursed, and on their respective 7-day pre- General C-4 reports.
 - The late reported contributions comprised 4% of the committee's total contributions for election year 2024.
- The Respondent's post-General C-4 report (covering 10/29-11/30) was filed 6 days late. The report disclosed \$15,500 in contributions (including the two contributions indicated above and \$3,000 in contributions received after the election), and \$26,067 in orders placed, debts and obligations. No expenditures were made or reported.

Allegation: Incomplete Reporting (2021-2024)

- As indicated above, the 2024 committee amended its carry-forward amount from 2020, thereby resolving the difference alleged in the complaint. The Respondent also said it was inactive during election years 2021-2023 and therefore not required to register or file reports.

Not Alleged: Last Minute Contribution Reporting (2024)

Although it was not alleged in the complaint, it appears the \$5,000 contribution from Firefighters Action Support Team (Fast PAC) and \$7,500 contribution from Active in Democracy Tacoma Firefighters Union that the committee received on 10/30/24 were subject to Last-Minute Contribution (LMC) reporting requirements. As the recipient of (aggregate) contributions of \$1,500 or more from a single source within 21 days of the General Election, the Respondent was required to disclose these contributions on LMC reports (or C-3 reports) no later than 11/1/24. The committee's failure to disclose LMCs is partially mitigated by the fact that the contributing committees did timely report the LMCs.

Not Alleged: Other Late Reporting (2024)

Our review of the Respondent's filing history for election year 2024 shows that an additional four (4) C-3 reports were filed 6-14 days late, none of which deprived the public of information during the time-sensitive period before the election. The committee's end-of-election C-4 report (covering Dec.) was filed 125 days late but only disclosed the continuation of previously reported debt. One C-3 report was timely amended, before the election, to correct the deposit date, which made the information 21 days late.

Summary and Resolution

Noncompliance appears to be the result of good-faith errors and omissions. The impact on the public of the late reports alleged in the complaint was attenuated because 1) the contributions received by your committee were timely made available to the public by the contributing committees prior to the election; and 2) the post-General report was not due until after the election and did not include any expenditure activity.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely report contributions and expenditures, especially during the time-sensitive period before an election. In the future, PDC staff expect you to timely file all required reports of contributions and expenditures, including C-3, C-4 and LMC reports. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff are also reminding you about the importance of ensuring the committee's beginning balance and deposit dates are accurate in the future, in accordance with the PDC laws, rules or guidance.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

Any allegations regarding reporting by your committee for election year 2024 that are not otherwise addressed herein are hereby dismissed.

If you have questions, you may contact Tabatha Blacksmith at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Electronically signed by Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavalley
Peter Frey Lavalley
Executive Director

cc: Conner Edwards