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| <b>Respondent Name</b>   |
| Lewis County Democratic Central Committee  |
| <b>Complainant Name</b>  |
| Conner Edwards   |
| <b>Complaint Description</b>   |
| <a href="#">Conner Edwards</a> reported via the portal<br>(Fri, 28 Mar 2025 at 10:54 PM)<br><br>See attached complaint.  |
| <b>What impact does the alleged violation(s) have on the public?</b>   |
| The PDC has an obligation to provide transparency to the voters by enforcing filing requirements. The agency's failure to actively enforce filing requirements damages both the public and the filers themselves |
| <b>List of attached evidence or contact information where evidence may be found</b>  |
| See attached and PDC website.  |
| <b>List of potential witnesses with contact information to reach them</b>  |
| See attached and 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.              |

**Complaint Against: Lewis County Democratic Central Committee**

**Submitted:** 3/28/2025

**Notice to Respondent Due By:** 4/7/25 per WAC 390-37-050(1)

**90 Day Initial Hearing Deadline:** 6/26/25 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.<sup>1</sup> 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.<sup>2</sup>

**Violations**

Only three days after the fourth(!) administrative dismissal issued by staff in favor of this respondent, the respondent once again failed to file reports on time.

The following five reports were submitted late:

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110276832>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110276831>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110276830>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110276829>

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110276828>

Because the respondent exceeded the \$750 reporting threshold for February, these reports were required to have been filed by March 10, but were not filed until March 24.

Additionally, it appears the committee has failed to properly include the level of expenditure details that staff believe to be required. See attached. Specifically, it appears that the expenditure for the newspaper ad fails to include the run date (instead it includes only the date of the event - <https://lewiscountydemocrats.org/how-will-pancakes-stop-an-oligarchy/>) . Also, it fails to include the run date or number of impressions for the Facebook ad. Additionally, the \$350 expenditure to Bob Guenther only says "LC Democratic Principles" which does not adequately inform the public as to the purpose of this expenditure. What does this mean?

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<sup>1</sup> <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics>

<sup>2</sup> <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics/key-dates-2024>

## **Conclusion**

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.

This complaint is one of over one thousand complaints 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/>

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.

**“You can’t make an omelet without breaking a few eggs.”**  
**— François de Charette**



Annual personal financial affairs reports (or F-1s) are due by April 15. See instructions and more information here.



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# LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON-EXEMPT (LCDCC)

2025


|                        |                      |                     |                |              |              |
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## Committee Overview

Registered September 15, 2005  
Democratic County Party  
Treasurer is Sonja Svenson

## Committee Contact

PO Box 382  
Chehalis, Washington 98532  
 [lewiscodemocratswa@gmail.com](mailto:lewiscodemocratswa@gmail.com)

 503-507-1011

### Financial Overview

|                   |   |                   |   |               |   |                   |
|-------------------|---|-------------------|---|---------------|---|-------------------|
| <b>\$5,145.97</b> | + | <b>\$3,655.00</b> | + | <b>\$0.00</b> | = | <b>\$8,800.97</b> |
| Starting balance  |   | Contributions     |   | Loans         |   | Total raised      |
| <b>\$1,043.38</b> |   |                   |   | <b>\$0.00</b> |   | <b>\$0.00</b>     |
| Total spent       |   |                   |   | Pledges       |   | Debt              |

### Committee Reports and Forms

- [Registration Form](#)
- [Contributors and Vendors Map](#)

Made to committee for 2025

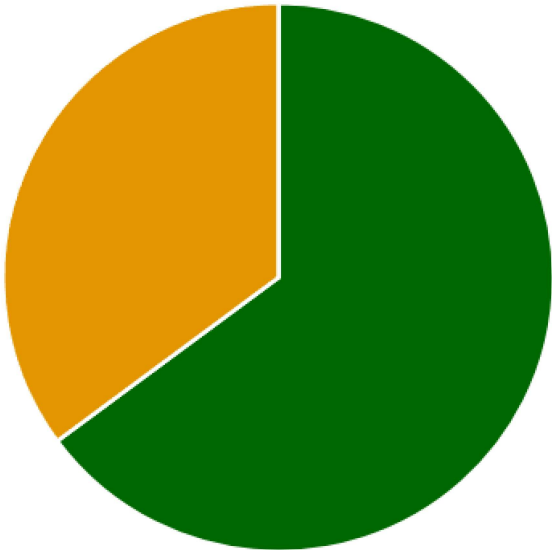
**Contributions**

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

Contributions made to committee for 2025

Other  
\$2,370.00

Individual  
\$1,285.00



Made by committee for 2025

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 2025

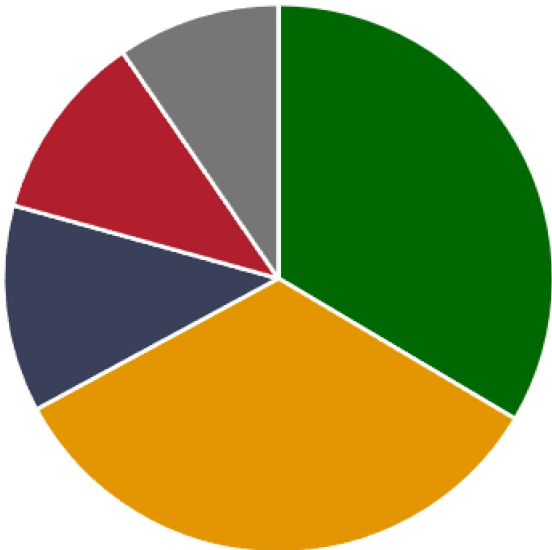
Inkind contribution  
\$350.00

Newspaper/periodical advertising  
\$350.00

Other  
\$127.43

Not Provided  
\$116.08

Digital advertising  
\$99.87



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 25 entries

Download 23 rows as CSV.

| Period                  | Report Number | Filed      | Report                      | Form Type | Election Year |
|-------------------------|---------------|------------|-----------------------------|-----------|---------------|
| 03/27/2025 - 03/27/2025 | 110277080     | 03/27/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 03/24/2025 - 03/24/2025 | 110276826     | 03/24/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 03/24/2025 - 03/24/2025 | 110276827     | 03/24/2025 | <a href="#">View Report</a> | C3        | 2025          |

| Period                     | Report Number | Filed      | Report                      | Form Type | Election Year |
|----------------------------|---------------|------------|-----------------------------|-----------|---------------|
| 03/21/2025 -<br>03/21/2025 | 110276708     | 03/21/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 03/14/2025 -<br>03/14/2025 | 110276315     | 03/16/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 03/14/2025 -<br>03/14/2025 | 110276316     | 03/16/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 03/07/2025 -<br>03/07/2025 | 110274591     | 03/07/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 03/07/2025 -<br>03/07/2025 | 110274605     | 03/07/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 03/06/2025 -<br>03/06/2025 | 110274334     | 03/06/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 02/27/2025 -<br>02/27/2025 | 110276828     | 03/24/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 02/24/2025 -<br>02/24/2025 | 110276829     | 03/24/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 02/19/2025 -<br>02/19/2025 | 110276832     | 03/24/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 02/17/2025 -<br>02/17/2025 | 110276831     | 03/24/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 02/10/2025 -<br>02/10/2025 | 110276830     | 03/24/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 02/06/2025 -<br>02/06/2025 | 110270495     | 02/06/2025 | <a href="#">View Report</a> | C3        | 2025          |



| Period                  | Report Number | Filed      | Report                      | Form Type | Election Year |
|-------------------------|---------------|------------|-----------------------------|-----------|---------------|
| 02/06/2025 - 02/06/2025 | 110270447     | 02/06/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 02/05/2025 - 02/05/2025 | 110270434     | 02/06/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 02/01/2025 - 02/28/2025 | 110274332     | 03/06/2025 | <a href="#">View Report</a> | C4        | 2025          |
| 01/31/2025 - 01/31/2025 | 110269879     | 02/02/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 01/28/2025 - 01/28/2025 | 110269876     | 02/02/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 01/24/2025 - 01/24/2025 | 110269880     | 02/02/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 01/19/2025 - 01/19/2025 | 110269881     | 02/02/2025 | <a href="#">View Report</a> | C3        | 2025          |
| 01/01/2025 - 01/31/2025 | 110274327     | 03/06/2025 | <a href="#">View Report</a> | C4        | 2025          |

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# LEWIS COUNTY DEMOCRATIC CENTRAL COMMITTEE - NON-EXEMPT (LCDCC)

2025

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## Itemized Expenditures

\$1,043.38

Shown below are the campaign’s expenditures. Small expenses may be grouped together and reported as one sum. Donated goods and services (known as in-kind contributions) also appear here as expenditures, with the contributor listed in the recipient column.

### Expenditures by Expense Type

Inkind contribution  
\$350.00

Newspaper/periodical advertising  
\$350.00

Other

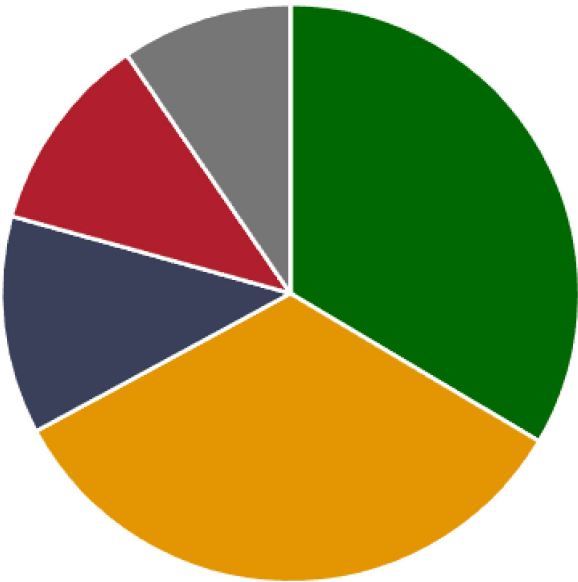
\$127.43

Not Provided

\$116.08

Digital advertising

\$99.87



Results for:

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Recipient Name

Enter text

X

Description

Enter text

X

Date

From

To

X

Recipient City

Enter text

X

Recipient State

Select

X

Amount

X

From

To

Show 

50

 entries

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| Recipient                    | Date       | Description                                    | Recipient City     | Recipient State | Amount   | Report   |
|------------------------------|------------|--|--------------------|-----------------|----------|--|
| Act Blue                     | 02/28/2025 | Act Blue processing fees                       | Somerville         | MA              | \$37.73  | <a href="#">View</a><br><a href="#">Report</a> |
| Act Blue                     | 02/01/2025 | Processing Fee                                 | Somerville         | MA              | \$3.05   | <a href="#">View</a><br><a href="#">Report</a> |
| Act Blue                     | 02/01/2025 | Processing Fee                                 | Somerville         | MA              | \$0.97   | <a href="#">View</a><br><a href="#">Report</a> |
| CT Publishing LLC            | 02/21/2025 | Advertising - March 22, 2025 Fundraising Event | Centralia          | WA              | \$350.00 | <a href="#">View</a><br><a href="#">Report</a> |
| EXPENSES OF \$200.00 OR LESS | 01/01/2025 |  |                    |                 | \$116.08 | <a href="#">View</a><br><a href="#">Report</a> |
| Facebook/META                | 02/10/2025 | Facebook Ads for LCDCC                         | Menlo Park,        | CA              | \$99.87  | <a href="#">View</a><br><a href="#">Report</a> |
| Guenther Bob                 | 01/09/2025 | LC Democratic Principles                       | Chehalis           | WA              | \$350.00 | <a href="#">View</a><br><a href="#">Report</a> |
| Sender.net                   | 02/24/2025 | Exchange rate fee                              | Vilnius, Lithuania |                 | \$1.68   | <a href="#">View</a><br><a href="#">Report</a> |

| Recipient  | Date       | Description  | Recipient City        | Recipient State | Amount  | Report   |
|------------|------------|--|-----------------------|-----------------|---------|--|
| Sender.net | 02/24/2025 | Marketing<br>email service -<br>1 year<br>subscription | Vilnius,<br>Lithuania |                 | \$84.00 | <a href="#">View</a><br><a href="#">Report</a> |

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