



State of Washington
PUBLIC DISCLOSURE COMMISSION

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July 28, 2025

Delivered electronically to Lewis County Democratic Central Committee at
treasurer@lewiscountymocrats.org

Subject: PDC Case 169672 regarding Lewis County Democratic Central Committee

Lewis County Democratic Central Committee:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Conner Edwards on March 28, 2025, and July 16, 2025. The complaints alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately disclose contributions and expenditures on C-3 and C-4 reports.

Applicable Laws and Rules

A committee that selects the “Full Reporting” option on their C-1pc report is required to report contributions and expenditures to the PDC on C-3 reports and 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.

[RCW 42.17A.235](#) describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions, in-kind donations of goods or services, and expenditures made by the campaign.

[RCW 42.17A.240](#) describes the required content of each campaign report including the name and address of each person making contributions and to whom an expenditure was made.

Background and Findings

- Lewis County Democratic Central Committee (the Committee) was registered as a bona fide county party committee during calendar year 2025 under the “Full Reporting” option, and was required to disclose contributions and expenditures on C-3 and C-4 reports.
- The complaints alleged the Committee had failed to submit five C-3 reports for deposits made in February 2025, failed to include the required detail for expenditures disclosed on C-4 reports, failed to submit the required 21-day pre-primary C-4 report due by July 15 for committees participating in the August 5, 2025, Primary Election, and misreported withdrawal of petty cash.

Complaint #1

- The Committee filed five C-3 reports disclosing monetary deposits made in February 2025 totaling \$885. The C-3 reports were filed on March 24, 2025, fourteen days late.
- The Committee submitted an original C-4 report disclosing activity from January 1 to 31, 2025 on March 6, 2025, 24 days late. Also on March 6, 2025, the Committee timely submitted an original C-4 report disclosing activity from February 1 to 28, 2025. The C-4 reports failed to include the required description for a \$99.87 February 10, 2025, expenditure for Facebook digital advertising, a \$350 February 21, 2025, expenditure to CT Publishing LLC for newspaper advertising, and a \$350 in-kind contribution received from Bob Guenther on January 9, 2025.
- On July 2, 2025, the Committee submitted an amendment to its January 2025 C-4 report to add a detailed description of the in-kind contribution from Bob Guenther. The Committee also submitted an amendment to its February 2025 C-4 report to add the run dates and number of impressions for the February 10 Facebook expenditure, and the run dates for advertisement paid to CT Publishing LLC on February 21. The amendments were submitted 142 and 114 days late, respectively.
- In his response, Committee Chair, Zac Eckstein, stated that the late filing of the C-3 reports was due to an inadvertent error. He stated that the activity was entered into the ORCA (Online Reporting of Campaign Activity) system but the reports were not submitted until the Committee Secretary returned from traveling. Mr. Eckstein said the Committee is working to appoint a Deputy Secretary to help mitigate issues like this.

Complaint #2

- On July 10, 2025, the Committee submitted a C-4 report disclosing activity for June 1 to June 30, 2025. After learning that it should have been following the reporting schedule required for Committees participating in the Primary Election, the Committee filed a C-4 report covering July 1 to 14 on July 24, 2025. The combination of these two C-4 reports covered the June 1 to July 14 reporting period required for the 21-day pre-primary election C-4 report and was ultimately disclosed nine days late.
- On April 3, 2025, the Committee timely filed the March 2025 C-4 report but failed to include the required description for a \$399.11 expenditure for political advertising paid to Facebook on March 24, 2025.
- The March 2025 C-4 report was amended 104 days late, on July 23, 2025, to include the FB ad run dates and number of impressions. In addition, the Committee removed the \$150 expenditure for petty cash originally disclosed on the March 2025 C-4 report, instead tracking this withdrawal via internal accounting methods per PDC staff's guidance.

Summary and Resolution

It appears that the late, and missing or incorrect reporting done by the Committee was due to lack of oversight and unfamiliarity with the election related accelerated reporting schedule requirements in

RCW 42.17A.235. Staff found no evidence that the errors were intentional or otherwise meant to conceal campaign activity from the public.

The Committee completed a Statement of Understanding (SOU) and paid a \$150 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely and accurately file five C-3 reports and the January 2025 and February 2025 C-4 reports. The \$150 penalty assessed resolves the allegations listed in this case for the complaint filed on March 28, 2025.

The PDC received the second complaint on July 16, 2025, after the Committee had already completed the SOU and paid the \$150 civil penalty, so staff could not include the additional allegations as part of the SOU.

Pursuant to WAC 390-37-060(1)(d), Lewis County Democratic Central Committee is receiving a formal written warning concerning failure to timely and accurately disclosure expenditures alleged in the second complaint filed on July 16, 2025. This formal written warning includes staff's expectation that the Committee timely and accurately file all future required reports of contributions and expenditures. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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

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

Sincerely,

Electronically signed by Jennifer Hansen

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee
Executive Director

cc: Conner Edwards