

Respondent Name
Hospitals for a Healthy Future PAC
Complainant Name
Conner Edwards
Complaint Description
Conner Edwards reported via the portal (Mon, 31 Mar 2025 at 8:33 PM) See attached complaint.
What impact does the alleged violation(s) have on the public?
See complaint.
List of attached evidence or contact information where evidence may be found
See complaint & PDC website.
List of potential witnesses with contact information to reach them
See complaint & 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.

Complaint Against: HOSPITALS FOR A HEALTHY FUTURE PAC**Submitted:** 3/31/2025**Notice to Respondent Due By:** 4/10/2025 per WAC 390-37-050(1)**90 Day Initial Hearing Deadline:** 6/29/2025 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.¹ 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.²

Violations

This Pac is an extremely well-resourced and sophisticated committee, as demonstrated by the large amounts of money it raises and spends every year. There are a number of problems with this committee's filings.

On its closing C4 for 2023, the PAC reported a \$856,554.21 closing COH balance.³

On its opening C4 for 2024, the PAC reported a \$755,187.83 opening COH balance.⁴

On its closing C4 for 2024, the PAC reported a \$579,360.14 closing COH balance.⁵

On its opening C4 for 2025, this PAC reported a \$610,954.80 opening COH balance.⁶

The closing and opening balances of political committee C4 reports should match. The fact that there is a difference of nearly \$100,000 and \$50,000 respectively suggests that the PAC's contributions and expenditures have not been reported properly.

Additionally, this PAC has filed numerous late C3/C4 reports and amendments late. Below is a non-exhaustive list of late reports.

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

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

³ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110200746>

⁴ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110201287>

⁵ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110275165>

⁶ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110275523>

- a) For 2024, the committee did timely file a 21-day pre-primary C4⁷ on 7/30/24, but this reported omitted ~\$6600 in in-kind contributions. A corrected version⁸ was not filed until 3/25/25, well over both the 2024 primary and general elections had already concluded.
- b) For 2024, the committee did timely file a 21-day pre-general C4⁹ on 10/15/24, but this report omitted a \$725 payment for design of PAC printed materials. A corrected version¹⁰ was not filed until about 4 months after the general election had already concluded.
- c) A C3 report containing a \$12,750 deposit was required to have been disclosed well before the 2021 August primary but was not disclosed until nearly a month after the due date.¹¹
- d) A C3 report containing a \$14,000 deposit was required to have been disclosed by June 10, 2022 but was not disclosed until nearly a month after the due date.¹²
- e) A C3 report containing a \$2850 deposit was required to have been disclosed by February 10, 2025 but was not disclosed until nearly a month after the due date.¹³
- f) A C3 report containing a \$61,700 deposit was required to have been disclosed by 7/22/24 but not disclosed until 8 days after the due date during the primary voting period.¹⁴
- g) A C4 report covering January of 2021 was due by February 10, 2021 but was not filed until 3 months after the deadline.¹⁵
- h) A C4 report covering February of 2021 was due by March 10, 2021 but was not filed until 2 months after the deadline.¹⁶
- i) A C4 report covering March of 2021 was due by April 10, 2021 but was not filed until over a month after the deadline.¹⁷

⁷ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110234280>

⁸ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110276976>

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¹⁰ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110275128>

¹¹ <https://web.pdc.wa.gov/rptimg/default.aspx?repno=110039276>

¹² <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110098426>

¹³ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110274167>

¹⁴ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110234159>

¹⁵ <https://web.pdc.wa.gov/rptimg/default.aspx?repno=110021004>

¹⁶ <https://web.pdc.wa.gov/rptimg/default.aspx?repno=110021005>

¹⁷ <https://web.pdc.wa.gov/rptimg/default.aspx?repno=110021006>

- j) A C4 report covering May of 2021 was due by June 10, 2021 but was not filed until over a month after the deadline.¹⁸

Additionally, for the in-kind contributions this PAC receives from WSHA, they simply report “in-kind contribution”. No description or breakdown of what was donated is included. Additionally, they have failed to include the quantity of printed items on one or more reports.¹⁹

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.

¹⁸ <https://web.pdc.wa.gov/rptimg/default.aspx?repno=110033533>

¹⁹ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110276976>

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