

<b>Respondent Name</b>
Washington Public Employees Association UFCW Local 365 PAC
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<a href="#">Conner Edwards</a> reported via the portal (Fri, 4 Apr 2025 at 2:54 PM)  See attached.
<b>What impact does the alleged violation(s) have on the public?</b>
See complaint
<b>List of attached evidence or contact information where evidence may be found</b>
See complaint & PDC website
<b>List of potential witnesses with contact information to reach them</b>
See complaint & 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: WA PUBLIC EMPLOYEES ASSOCIATION/UFCW LOCAL 365 PAC**

**Submitted:** 4/4/2025

**Notice to Respondent Due By:** 4/14/2025 per WAC 390-37-050(1)

**90 Day Initial Hearing Deadline:** 7/3/2025 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.<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**

This respondent is a well-resourced, sophisticated PAC that has been registered with the PDC since 1998.

In January and February of 2025, this committee had activity exceeding the \$750 reporting threshold, triggering a March 10, 2025 deadline. Despite this, the C3/C4 reports for January and February were not filed until 4/3/25, nearly a month after the deadline. See link: <https://pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2025-20717>

Additionally, this PAC has reported a regularly reoccurring in-kind contribution from WASHINGTON PUBLIC EMPLOYEES ASSOCIATION since at least 2022. No information is provided for this in-kind contribution beyond "wages, benefits and overhead". No sub-vendor information is included. Given the lump sum repeating amount, I suspect that this is not an accurate calculation of any in-kind actually received.

**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

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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>

## **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.

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

**— Mahatma Gandhi**