

Respondent Name
Vote4islandhealth Sponsored by Island Health Foundation
Complainant Name
Conner Edwards
Complaint Description
Conner Edwards reported via the portal (Sat, 5 Apr 2025 at 11:48 PM) See 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: Vote4islandhealth Sponsored by Island Health Foundation**Submitted:** 4/5/2025**Notice to Respondent Due By:** 4/15/2025 per WAC 390-37-050(1)**90 Day Initial Hearing Deadline:** 7/4/2025 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 committee has committed a number of different violations.

First off, on its registration statement, the committee lists the election year that it is participating in as "2024" when in fact it is participating in the April 2025 special election. See registration: https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=62983 . See 2025 April Special Election Info: <https://www.skagitcounty.net/AuditorElections/Documents/2025-04-22%20VP%20-%20English.pdf> . This is a violation of RCW 42.17A.205.

On the committee's registration (linked above) the committee registered under the mini reporting option on 2/28/25. This registration was filed late because the committee had received a \$7000 contribution on 2/5/25 and the registration was required to have been filed by 2/19/25. This is a violation of RCW 42.17A.205.

This committee did not qualify for the mini reporting option because it received \$7000 from one contributor (<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110277252>) and under the mini reporting limit, a committee may only receive \$500 from any one donor. This is a violation of WAC 390-16-125.

Additionally, the committee was required to file its 21-day pre-election C4 by 4/1/25, but failed to file the C4 report until 4/5/25. This makes it four days late. See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110278268> .

Additionally, on the above referenced C4, the committee failed to list the run date for a newspaper advertisement that ran in the Anacortes American newspaper.

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>

Additionally, this C4 report (covering February of 2025) was required to have been filed no later than 3/10/25. It was not filed until 4/5/25, approximately a month after the deadline. See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110278264> .

Additionally, this C3 (for a \$7000 deposit) was required to have been filed no later than 2/10/25 due to the weekly C3 reporting schedule for committee's participating in the April 2025 election. However, the C3 was not filed until 3/30/25, approximately 6 weeks after the deadline. See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110277252> .

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.

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

— **Mahatma Gandhi**