



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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July 15, 2025

Delivered electronically to electpatsycudaback@gmail.com and cg.edwards53@gmail.com

Subject: PDC Case 170194 regarding Patricia Cudaback

Dear Patricia Cudaback:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on April 7, 2025. The complaint alleged a violation of RCW 42.17A.235 and .240 for failure to timely and accurately disclose contributions and expenditures on reports for election year 2025. Specifically, the complaint alleged that the Patricia Cudaback (the “Respondent”) erroneously filed 2025 reports under a 2024 campaign, untimely submitted C-4 reports, and failed to fully disclose vendor details for in-kind contributions on reports.

Applicable Laws and Rules

- Candidates are required to register pursuant to [RCW 42.17A.205](#) by filing a *Candidate Registration* (C-1 report) with the PDC within two weeks of candidacy. A candidate that selects the Full Reporting option on their C-1 report is required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (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 candidate’s election participation¹, and their financial activity.
- Pursuant to [RCW 42.17A.235\(3\)\(a\)](#), each treasurer of a candidate or political committee is required to file a report on the tenth day of each month during which they are not participating in an election campaign only if the committee 1) received a contribution or made an expenditure in the preceding calendar month; and 2) either total contributions received or total expenditures made since the last such report exceed \$750.

¹ [RCW 42.17A.005\(38\)](#) defines “participate” to mean that, with respect to a particular election, an entity engages in one or more of the following activities: 1) makes a monetary or in-kind contribution to a candidate; 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate; or 3) engages in an activity described in .005(38)(c), (d) or (e).

- Per [RCW 42.17A.240\(2\)](#), monetary contributions are disclosed on C-3 reports, which must include, but are not limited to: 1) the name and address of each person who contributed more than \$100 during the period covered by the report; 2) the monetary value and date of each contribution, except for the items specifically mentioned in subsection (2)(a) through (g); and 3) the aggregate value of all contributions received from each person during the campaign. “Contribution,” as defined, includes an in-kind contribution, which is disclosed on a C-4 report.
- [RCW 42.17A.005\(52\)](#) defines a “Technical correction” as the correction of a minor or ministerial error in a required report that does not materially harm the public interest and needs to be corrected for the report to be in full compliance with the requirements of chapter 42.17A RCW.

Background and Findings

- The Respondent is a 2025 candidate for the office of Mayor with the City of Monroe. The Respondent first registered as a 2025 candidate with the PDC on December 24, 2024 and selected the Full Reporting option on her *Committee Registration* (C-1 report). Elections Division records indicate that candidate Cudaback is not participating in the Primary Election but is advancing to the General Election.
- On February 8, 2025, the Respondent’s campaign erroneously filed a second *Committee Registration* (C-1 report) for election year of 2024, which subsequently allowed them to submit reports for election year 2024.
- On March 1, 2025 and April 6, 2025, the Respondent’s campaign erroneously filed four C-3 reports and four monthly C-4 reports for election year 2025 under the 2024 registration:
 - The original monthly C-4 reports for December 2024, January 2025, and February 2025 were first filed on April 6, 2025, which is 27 days late. All three reports were due March 10, 2025, based on when the \$750 reporting threshold was met (in February).
 - Vendor name and/or address details were also missing from these three, monthly C-4 reports for seven in-kind contributions that the candidate made to her own campaign.
 - The original C-4 report for March 2025 was due April 10, 2025 and timely submitted on April 6, 2025.
 - Original C-3 reports for deposits made on 2/7/25, 2/19/25, and 2/26/25 were due March 10, 2025 and timely filed on March 1, 2025.
 - The original C-3 report for a 3/31/25 deposit was due April 10, 2025 and timely submitted on April 6, 2025.

- On April 7, 2025 and prior to the complaint being filed, the Respondent's campaign reached out to PDC staff for assistance because reports filed for their 2025 campaign did not appear online. Staff discovered that the campaign had erroneously created a 2024 registration under which it had filed eight reports that were for 2025 activity. Staff instructed the campaign to refile the eight reports under their 2025 registration. The Respondent's good-faith effort to resolve the error prior to being notified of the complaint is a mitigating factor.
- On April 8, 2025, the Respondent's campaign refiled reports disclosing their contributions and expenditures for December 2024 through March 2025 via their 2025 candidate registration.
- The Respondent responded to the complaint by email on April 20, 2025 and indicated her belief that all reports were filed in a timely manner, albeit under the year 2024 instead of 2025, that she had not yet received any in-kind contributions, and that expenditures were not reportable until they reached the \$750 reporting threshold.
- On April 25, 2025 and within twenty-four hours of the PDC's request, the Respondent amended the December 2024 through February 2025 C-4 reports to include vendor name and/or address details for the seven in-kind contributions she made to her own campaign.
- The Respondent was cooperative throughout the investigation.
- The Respondent does not have previous warnings/violations of PDC requirements.

PDC staff are working to move the reports that were erroneously filed under a 2024 registration to the Respondent's 2025 registration.

Summary and Resolution

Your three late C-4 reports appear to be good-faith omissions based on a misunderstanding regarding the cumulative nature of the \$750 reporting threshold when C-4 reports have not previously been filed. Our records show the campaign exceeded the threshold when you received a \$200 contribution on February 7, 2025, which caused total contributions to reach \$867.94 for the election year. The impact of noncompliance on the public was minimal because the reports were filed in early April of 2025, nearly seven months before the General Election in which you are participating.

The missing vendor details for your in-kind contributions also appear to be good-faith omissions and are mitigated by your quick corrective action.

The submission of eight reports under a 2024 registration is a minor or ministerial error concerning required reports that did not materially harm the public interest. You refiled the reports, thereby correcting the error, within two days of being notified by PDC staff and well in advance of the relevant election. The matter of the misfiled reports is therefore hereby resolved as a Technical Correction pursuant to [WAC 390-37-060\(1\)\(b\)](#).

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely disclose contribution and expenditures on three monthly C-4 reports during election

year 2025. PDC staff expect you to timely and accurately report contributions and expenditures in the future. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff is also reminding you about the importance of including the name and address of the vendor from whom an item or service is purchased when disclosing in-kind contributions on C-4 reports in the future, in accordance with the PDC laws, rules or guidance.

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 Tabatha Blacksmith at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed by Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

cc: Conner Edwards