

Respondent Name
WASHINGTON OPTOMETRIC PHYSICIANS PAC
Complainant Name
Conner Edwards
Complaint Description
Conner Edwards reported via the portal (Fri, 4 Apr 2025 at 3:13 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: WASHINGTON OPTOMETRIC PHYSICIANS POLITICAL ACTION COMMITTEE

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.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 respondent is a well-resourced, sophisticated PAC that has been registered with the PDC since 2003. The PAC regularly raises and spends between \$50,000 to \$100,000 depending on the year. The organization employs a lobbyist. This organization utilizes a paid treasurer. As of the last C4 report, this PAC has reported a \$307,674.98 cash on hand balance.

This respondent recently received a wrist-slap penalty for significant past reporting violations. The penalty was for \$300. This small penalty has apparently not had any meaningful deterrent effect.

This C3 (for a ~\$8600 deposit) was required to have been filed by 3/10/25. It was not filed until 4/3/25, nearly a month late. See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110277987> .

Additionally, this C4 (covering February of 2025) was required to have been filed by 3/10/25. It was not filed until 4/3/25, nearly a month late. See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110277988> .

Additionally, this PAC reported a ~\$500 payment for "Annual Snowball Fee" to its treasurer. I believe this is likely a reimbursement for an expenditure but there is no subvendor information provided. See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110262141> .

Additionally, this organization's statement of registration has not been updated since 2021. See link: https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=47206 .

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>

The organization has also not disclosed any interest payments in 2024 or 2025. Considering the organization's large bank account balance and current interest rates, it seems unlikely that there would be no interest accruing to this account. This is likely indicative of larger accounting issues.

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