

<b>Respondent Name</b>
North Thurston Citizens for Schools
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<a href="#">Conner Edwards</a> reported via the portal (Sun, 6 Apr 2025 at 1:04 AM) See complaint.
<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: North Thurston Citizens for Schools (NTCFS)****Submitted:** 4/6/2025**Notice to Respondent Due By:** 4/16/2025 per WAC 390-37-050(1)**90 Day Initial Hearing Deadline:** 7/5/2025 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 committee has previously received two warning letters, see link:

<https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases?respondent=North+Thurston>

**Penny Auction Income Improperly Reported**

On this C3 report (<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110264520>) the committee reported \$9040.00 in income from the "Penny Auction". No itemized list of contributors was disclosed, which would only be appropriate if this fundraiser qualified as a low-cost fundraiser. It does not appear to qualify as such.

In the committee's previous response to a complaint, the respondent noted that the fundraiser is called a "Penny Auction" because the items are not actually auctioned off; they are won by a "drawing" where the attendees purchase tickets from the Committee and the tickets are placed "in bags next to the items they hope to win." She stated the "Penny Auction" items are donated by North Thurston School District teachers, administrators, staff, or volunteers from the various schools in the district.

The PDC's website states that income may be reported as part of a lump-sum low-cost-fundraiser only if one of the following conditions is met:

- retail sales of goods or services at a reasonable approximation of their fair market value;

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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>

- a gambling operation conducted in compliance with state gambling laws (contact the Gambling Commission at 360-486-3440);
- a food and beverage event where the admission price or the cost for the food and beverages is no more than \$100;
- an entertainment event (concert, dance, theater performance, etc.) where the admission price is no more than \$100; and
- an auction or similar sale where the total fair market value of items donated by any person is no more than \$150.

(Source: <https://www.pdc.wa.gov/registration-reporting/candidates-committees/contributions/low-cost-fundraisers>)

- a) As indicated above, this is a game of chance and therefore not a retail sale of goods or services.
- b) Because this fundraiser is a game of chance opened to members of the public that raised over \$5000 in a calendar year (<https://wsgc.wa.gov/licensing/activities-dont-require-license/charitable-and-nonprofit-activities-dont-require-license>) it is not a gambling operation conducted in compliance with state gambling law.
- c) As indicated above, this is not a food and beverage event.
- d) As indicated above, this is not an entertainment event.
- e) As indicated above, this is not a genuine auction but rather a game of chance. Additionally, many of the donated items exceed \$150.

Unless the organization can account for who donated what money (and report the same on a C3 report filed with the PDC) these funds should be considered anonymous and forfeit (partially) to the state's general fund in accordance with applicable law.

### **Other Contributions Not Being Reported Properly**

This committee appears to be improperly attributing contributions received from contributors. See link: <https://pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2028-36069#contributions> .

For example, see this report containing a \$1000 from Alysea Ardourel- Huitt-Zollars (<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110276239>) . Huitt-Zollars is a company; did the contribution come from Alysea Ardourel the individual or from the company?

The same issue can be found on this report (<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110206282>), is the \$500

contribution from BLAIR PRIGGE or MTN2COAST? What about the \$1000 contribution from GREENE GASAWAY or JESSE AHBURG? This issue is present for many other contributions.

### **In-Kind Contributions Lacking Detail**

See C4 report covering December of 2024:

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110266794> .

This report contained numerous in-kind contributions from individuals/organizations that were donating items for the committee's annual fundraiser.

On the PDC's website, the agency states: "if the in-kind contribution is a good or service purchased from a vendor, include the name and the address of the vendor;" Source:

<https://www.pdc.wa.gov/registration-reporting/candidates-committees/contributions/kind-contributions> .

Despite this, none of the disclosed in-kind contributions include the name and address of the vendor from which the in-kind contributed item was procured. I imagine that PDC staff will believe this to be a violation.

### **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**

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Enter Org No, License No, Part of Org or Individual Name (Last, First), or City Name, or UBI:

☐ Search for Only Active Licenses

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02-09439	05/22/2014	L	02	B	GATEWAY ROTARY CLUB/NORTH THURSTON	OLYMPIA	SW	(360) 791-3507	Raffle	603133274

Further public information may be obtained by contacting the Gambling Commission.

A or B (type 68) – Public Card Room Employee

C – Class III Sub Contractor Employee

NA – Class III Certification Employee

A (type 69) – Class III Eligibility Employee

Note: Status Code(s\*):

A: Active

H: Pending

L: Lapsed

S: Surrendered Voluntarily

Search hint:

To search by last name: enter the last name follow by a comma (example: Smith,)

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THURSTON

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THURSTON ×

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CENTENNIAL ELEM SCHOOL BOOSTER ASSN

Phone

(360) 596-8300

Address

2637 45TH AVE SE  
OLYMPIA, WA 98501

Expiration date

06/30/2025

Not within city limits

Contact name

AMY HILL

UBI

601279913

OLYMPIA

THURSTON

Bingo

## CENTENNIAL ELEM SCHOOL BOOSTER ASSN



### Phone

(360) 596-8300



### Address

2637 45TH AVE SE  
OLYMPIA, WA 98501



### Expiration date

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### Not within city limits



### Contact name

AMY HILL



### UBI

601279913

**OLYMPIA**

**THURSTON**

**Raffle**

## HOLY FAMILY SCHOOL



### Phone

(360) 491-7060



### Address

2606 CARPENTER RD NE  
LACEY, WA 98516



### Expiration date

06/30/2025



### Within city limits

 **Contact name**  
DAVID GEDROSE

 **UBI**  
601244317

**LACEY      THURSTON      Raffle**