



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

**Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcca.gov](http://www.pdcca.gov)**

July 14, 2025

Delivered electronically to [barc@council2.com](mailto:barc@council2.com)

Subject: PDC Case 170673 regarding WA St Council of Co & City Employees PAC

WA St Council of Co & City Employees PAC:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on April 16, 2025. The complaint alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures.

Applicable Laws and Rules

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.

Pursuant to [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.

Background and Findings

- The Respondent used the legal counsel on retainer with their parent organization for guidance on PDC Case 164581, which created an in-kind contribution to the PAC when the legal fees were paid.
- The Respondent's treasurer of record, Barbara Corcoran, stated she did not realize the legal fees should be reported by the PAC.

- The Respondent amended the February 2025 C-4 report on April 28, 2025, to show the \$1,375 in-kind contribution from WA St Council of CO & City Employees (parent organization for the PAC).

#### Summary and Resolution

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purpose of this chapter. Under WAC 390-37-060, the executive director, at any time prior to consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted.

The violations of PDC laws and rules made by you are remediable in nature and do not warrant further investigation or enforcement action. The expenditures or contributions involved totaled no more than the contribution limits set forth in RCW 42.17A.405(2) or \$1,500, and the violations occurred more than 30 days before an election, were inadvertent and minor and have otherwise been cured. They did not materially harm the public interest beyond the harm to the policy of Chapter 42.17A RCW inherent in any violation.

In addition, you took corrective action within five business days after being notified of noncompliance by PDC staff and substantially met filing deadlines for all other required reports within the preceding 12 months.

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 Tabitha Townsend at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

*Electronically signed by Tabitha Townsend*  
Tabitha Townsend  
Compliance Officer

Endorsed by,

*Electronically signed by Kim Bradford*  
Kim Bradford  
For Peter Frey Lavallee  
Executive Director

cc: Conner Edwards

Commented [BK1]: @Townsend, Tabitha (PDC) I think I alert you to this. This figure should be \$1,500.

Commented [TT2R1]: @Bradford, Kim (PDC) I did not update any examples left in the letter....oops. I can update this. Also, Tab B is going to be re-writing the letter going forward.