

<b>Respondent Name</b>
Holly Chisa
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<a href="#">Conner Edwards</a> reported via the portal (Tue, 29 Apr 2025 at 2:34 PM)  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: Holly Chisa

Submitted: 4/29/2025

Notice to Respondent Due By: 5/9/2025 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 7/28/2025 per RCW 42.17A.755(3)

Statutes Violated: RCW 42.17A.615

## 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 efforts to influence state law and policy through lobbying.

The public disclosure law was enacted through voter approval of Initiative 276 in 1972.

State law requires lobbyists and lobbyist employers to file timely/accurate reports to the public disclosing their reason for lobbying and how much they spend on lobbying efforts. Generally, lobbyists must report their lobbying efforts on form L2 on the 15<sup>th</sup> day of the following month.

## Violations

This lobbyist filed the following late reports:

Filer Name	Report Type	Amends Report	Report From	Report To	Due Date	Date Filed	Days Lat	URL
HOLLY CHISA	L2	2005851	1/1/2024	1/31/2024	2/15/2024	3/20/2025	399	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2006177">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2006177</a>
HOLLY CHISA	L2 AMENDED	2002729	1/1/2024	1/31/2024	2/15/2024	3/14/2025	393	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005851">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005851</a>
HOLLY CHISA	L2	2005850	2/1/2024	2/29/2024	3/15/2024	3/20/2025	370	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2006178">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2006178</a>
HOLLY CHISA	L2 AMENDED	2002730	2/1/2024	2/29/2024	3/15/2024	3/14/2025	364	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005850">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005850</a>
HOLLY CHISA	L2	2002731	3/1/2024	3/31/2024	4/15/2024	3/14/2025	333	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005852">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005852</a>
HOLLY CHISA	L2 AMENDED	196573	1/1/2024	1/31/2024	2/15/2024	1/15/2025	335	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002729">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002729</a>
HOLLY CHISA	L2	2005855	4/1/2024	4/30/2024	5/15/2024	3/20/2025	309	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2006179">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2006179</a>
HOLLY CHISA	L2 AMENDED	203075	2/1/2024	2/29/2024	3/15/2024	1/15/2025	306	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002730">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002730</a>
HOLLY CHISA	L2 AMENDED	2002732	4/1/2024	4/30/2024	5/15/2024	3/14/2025	303	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005853">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005853</a>
HOLLY CHISA	L2 AMENDED	2005853	4/1/2024	4/30/2024	5/15/2024	3/14/2025	303	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005855">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005855</a>
HOLLY CHISA	L2	2002733	5/1/2024	5/31/2024	6/15/2024	3/14/2025	272	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005856">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005856</a>
HOLLY CHISA	L2 AMENDED	203076	3/1/2024	3/31/2024	4/15/2024	1/15/2025	275	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002731">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002731</a>
HOLLY CHISA	L2 AMENDED	203077	4/1/2024	4/30/2024	5/15/2024	1/15/2025	245	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002732">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002732</a>
HOLLY CHISA	L2	2002735	6/1/2024	6/30/2024	7/15/2024	3/14/2025	242	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005857">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005857</a>
HOLLY CHISA	L2 AMENDED	207121	5/1/2024	5/31/2024	6/15/2024	1/15/2025	214	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002733">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002733</a>
HOLLY CHISA	L2	2002736	7/1/2024	7/31/2024	8/15/2024	3/14/2025	211	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005858">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005858</a>
HOLLY CHISA	L2 AMENDED	207122	6/1/2024	6/30/2024	7/15/2024	1/15/2025	184	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002735">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002735</a>
HOLLY CHISA	L2	2004717	8/1/2024	8/31/2024	9/15/2024	3/14/2025	180	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005859">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005859</a>
HOLLY CHISA	L2 AMENDED	2002737	8/1/2024	8/31/2024	9/15/2024	2/24/2025	162	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004717">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004717</a>
HOLLY CHISA	L2 AMENDED	207123	7/1/2024	7/31/2024	8/15/2024	1/15/2025	153	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002736">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002736</a>
HOLLY CHISA	L2	2004716	9/1/2024	9/30/2024	10/15/2024	3/14/2025	150	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005860">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005860</a>
HOLLY CHISA	L2 AMENDED	2002738	9/1/2024	9/30/2024	10/15/2024	2/24/2025	132	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004716">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004716</a>
HOLLY CHISA	L2 AMENDED	207124	8/1/2024	8/31/2024	9/15/2024	1/15/2025	122	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002737">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002737</a>
HOLLY CHISA	L2	2004715	10/1/2024	10/31/2024	11/15/2024	3/14/2025	119	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005861">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005861</a>
HOLLY CHISA	L2 AMENDED	2002739	10/1/2024	10/31/2024	11/15/2024	2/24/2025	101	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004715">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004715</a>
HOLLY CHISA	L2 AMENDED	2000965	9/1/2024	9/30/2024	10/15/2024	1/15/2025	92	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002738">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002738</a>
HOLLY CHISA	L2	2004712	11/1/2024	11/30/2024	12/15/2024	3/14/2025	89	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005862">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005862</a>
HOLLY CHISA	L2 AMENDED	0	5/1/2024	5/31/2024	6/15/2024	8/27/2024	73	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/207121">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/207121</a>
HOLLY CHISA	L2 AMENDED	2002740	11/1/2024	11/30/2024	12/15/2024	2/24/2025	71	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004712">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004712</a>
HOLLY CHISA	L2 AMENDED	2000964	10/1/2024	10/31/2024	11/15/2024	1/15/2025	61	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002739">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002739</a>
HOLLY CHISA	L2	2004711	12/1/2024	12/31/2024	1/15/2025	3/14/2025	58	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005863">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005863</a>
HOLLY CHISA	L2 AMENDED	0	2/1/2024	2/29/2024	3/15/2024	5/8/2024	54	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/203075">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/203075</a>
HOLLY CHISA	L2 AMENDED	0	9/1/2024	9/30/2024	10/15/2024	11/27/2024	43	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2000965">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2000965</a>
HOLLY CHISA	L2 AMENDED	0	6/1/2024	6/30/2024	7/15/2024	8/27/2024	43	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/207122">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/207122</a>
HOLLY CHISA	L2 AMENDED	2002727	12/1/2024	12/31/2024	1/15/2025	2/24/2025	40	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004711">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004711</a>
HOLLY CHISA	L2 AMENDED	2000963	11/1/2024	11/30/2024	12/15/2024	1/15/2025	31	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002740">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2002740</a>
HOLLY CHISA	L2	2004708	1/1/2025	1/31/2025	2/15/2025	3/14/2025	27	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005864">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005864</a>
HOLLY CHISA	L2 AMENDED	0	3/1/2024	3/31/2024	4/15/2024	5/8/2024	23	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/203076">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/203076</a>
HOLLY CHISA	L2 AMENDED	0	10/1/2024	10/31/2024	11/15/2024	11/27/2024	12	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2000964">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2000964</a>
HOLLY CHISA	L2 AMENDED	0	7/1/2024	7/31/2024	8/15/2024	8/27/2024	12	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/207123">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/207123</a>
HOLLY CHISA	L2 AMENDED	0	1/1/2025	1/31/2025	2/15/2025	2/24/2025	9	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004708">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2004708</a>
HOLLY CHISA	L2 AMENDED	0	1/1/2024	1/31/2024	2/15/2024	2/20/2024	5	<a href="https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/196573">https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/196573</a>

## **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**