

Respondent Name
Palattao Burnes Strategies
Complainant Name
Conner Edwards
Complaint Description
Conner Edwards reported via the portal (Tue, 29 Apr 2025 at 2:29 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: Palattao Burnes Strategies

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 15th 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
Palattao Burnes Strategies	L2	2006464	1/1/2024	1/31/2024	2/15/2024	4/4/2025	414	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006479
Palattao Burnes Strategies	L2 AMENDED	2004835	1/1/2024	1/31/2024	2/15/2024	4/4/2025	414	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006464
Palattao Burnes Strategies	L2	2006463	2/1/2024	2/29/2024	3/15/2024	4/4/2025	385	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006478
Palattao Burnes Strategies	L2 AMENDED	200421	2/1/2024	2/29/2024	3/15/2024	4/4/2025	385	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006463
Palattao Burnes Strategies	L2 AMENDED	197515	1/1/2024	1/31/2024	2/15/2024	2/25/2025	376	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2004835
Palattao Burnes Strategies	L2	2006462	3/1/2024	3/31/2024	4/15/2024	4/4/2025	354	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006476
Palattao Burnes Strategies	L2 AMENDED	201091	3/1/2024	3/31/2024	4/15/2024	4/4/2025	354	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006462
Palattao Burnes Strategies	L2	2006461	4/1/2024	4/30/2024	5/15/2024	4/4/2025	324	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006475
Palattao Burnes Strategies	L2 AMENDED	203408	4/1/2024	4/30/2024	5/15/2024	4/4/2025	324	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006459
Palattao Burnes Strategies	L2 AMENDED	2006459	4/1/2024	4/30/2024	5/15/2024	4/4/2025	324	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006461
Palattao Burnes Strategies	L2	2006458	5/1/2024	5/31/2024	6/15/2024	4/4/2025	293	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006474
Palattao Burnes Strategies	L2 AMENDED	204653	5/1/2024	5/31/2024	6/15/2024	4/4/2025	293	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006458
Palattao Burnes Strategies	L2	205750	6/1/2024	6/30/2024	7/15/2024	4/4/2025	263	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006457
Palattao Burnes Strategies	L2	207059	7/1/2024	7/31/2024	8/15/2024	4/4/2025	232	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006456
Palattao Burnes Strategies	L2	207963	8/1/2024	8/31/2024	9/15/2024	4/4/2025	201	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006455
Palattao Burnes Strategies	L2	2002180	9/1/2024	9/30/2024	10/15/2024	4/4/2025	171	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006454
Palattao Burnes Strategies	L2	2000839	10/1/2024	10/31/2024	11/15/2024	4/4/2025	140	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006453
Palattao Burnes Strategies	L2	2002171	11/1/2024	11/30/2024	12/15/2024	4/4/2025	110	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006452
Palattao Burnes Strategies	L2 AMENDED	2000037	9/1/2024	9/30/2024	10/15/2024	1/6/2025	83	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2002180
Palattao Burnes Strategies	L2	2002172	12/1/2024	12/31/2024	1/15/2025	4/4/2025	79	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006451
Palattao Burnes Strategies	L2	2003575	1/1/2025	1/31/2025	2/15/2025	4/4/2025	48	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006449
Palattao Burnes Strategies	L2 AMENDED	0	11/1/2024	11/30/2024	12/15/2024	1/6/2025	22	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2002171
Palattao Burnes Strategies	L2	2005364	2/1/2025	2/28/2025	3/15/2025	4/4/2025	20	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2006448
Palattao Burnes Strategies	L2 AMENDED	209146	9/1/2024	9/30/2024	10/15/2024	10/31/2024	16	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2000037
Palattao Burnes Strategies	L2 AMENDED	0	2/1/2024	2/29/2024	3/15/2024	3/26/2024	11	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/200421
Palattao Burnes Strategies	L2 AMENDED	0	1/1/2024	1/31/2024	2/15/2024	2/24/2024	9	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/197515
Palattao Burnes Strategies	L2 AMENDED	207036	7/1/2024	7/31/2024	8/15/2024	8/21/2024	6	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/207059
Palattao Burnes Strategies	L2 AMENDED	0	7/1/2024	7/31/2024	8/15/2024	8/20/2024	5	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/207036
Palattao Burnes Strategies	L2 AMENDED	0	10/1/2024	10/31/2024	11/15/2024	11/19/2024	4	https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/l2-report/2000839

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