

Respondent Names
AARP No on I 2124
Complainant Name
Conner Edwards
Complaint Description
<u>Conner Edwards</u> reported via the portal <i>Fri, 11 Jul 2025 at 4:30 PM)</i> See complaint.
What impact does the alleged violation(s) have on the public?
See complaint & PDC website.
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: AARP No on I 2124 Sponsored by AARP Washington State

Submitted: 7/11/2025

Notice to Respondent Due By: 7/21/2025 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 10/9/2025 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 C4 was submitted two months after the deadline, see link:

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110297562>

Additionally (for the above referenced C4 report) the vendor addresses for the in-kind contributions are missing, which I understand PDC staff believe are required to be disclosed.

Additionally, the committee failed to list the suspended portion of the penalty as a debt on the above referenced C4 report.

More significantly, the report lists \$83,696 in payments to the respondent's legal firm. Assuming a billing rate of \$500 an hour, this would amount to approximately 167 billable hours. While it is critical for attorneys to be well-compensated for their services, it is not credible to think that this firm put in this amount of work over a two-month period. This is especially the case considering the conciliatory approach that PDC staff took with regards to working on the enforcement case against the respondent.

Instead, I believe that these payments represent legal work that occurred during the election or at some period from December 2024 to March 2025. As such, the amount owed would likely have been required to be disclosed as debt on earlier C4 reports. Yet, this did not occur.

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>

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