

Respondent Name
Cassie Franklin
Complainant Name
Conner Edwards
Complaint Description
Conner Edwards reported via the portal (Thu, 3 Jul 2025 at 3:25 PM) 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: CASSANDRA J FRANKLIN (Cassie Franklin)

Submitted: 7/3/2025

Notice to Respondent Due By: 7/13/2025 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 10/1/2025 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 C3 (for a \$5650 deposit) was filed 22 days late, see link:

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110295353>

This C3 (for a \$500 deposit) was filed 15 days late, see link:

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110295354>

Additionally, this respondent is missing the proper expenditure descriptions for a whole host of expenditures, typically relating to printing expenses, see link: <https://pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/567405#expenditures>

As just one example, see this C4 where the number of yard signs purchased was not disclosed, see link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110294057>

Numerous other examples have also been attached.

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

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>

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



CASSANDRA J FRANKLIN

(Cassie Franklin)

Candidate for MAYOR for CITY OF EVERETT in the 2025 election.

Overview	Contributions	Expenditures	Pledges	Debts	Loans
Independent Expenditures					

Itemized Expenditures

\$62,992.97

Shown below are the campaign’s expenditures. Small expenses may be grouped together and reported as one sum. Donated goods and services (known as in-kind contributions) also appear here as expenditures, with the contributor listed in the recipient column.

Expenditures by Expense Type

Management and consulting services

\$42,797.50

Accounting, legal, regulatory...

\$6,114.00

Inkind contribution

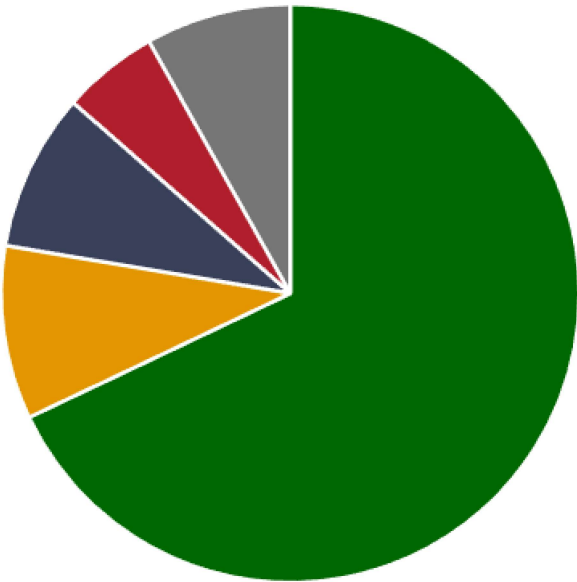
\$5,565.21

Printing campaign signs

\$3,385.95

Miscellaneous

\$5,130.31



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Recipient State

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From

To

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Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Terra Firma Consulting	02/13/2025	Management and consulting services	Lake Stevens	WA	\$8,000.00	View Report
COMMUNICATIONS COUNSEL, INC	03/15/2023	Management and consulting services	GRANVILLE	OH	\$4,797.50	View Report
Terra Firma Consulting	05/30/2024	Retainer payment	Lake Stevens	WA	\$3,000.00	View Report
Donavan Smith Creative J	10/21/2024	Management and consulting services	Everett	WA	\$3,000.00	View Report
Donavan Smith Creative J	12/24/2024	Management and consulting services	Everett	WA	\$3,000.00	View Report
Donavan Smith Creative J	12/02/2024	Management and consulting services	Everett	WA	\$3,000.00	View Report
Donavan Smith Creative J	11/12/2024	Management and consulting services	Everett	WA	\$3,000.00	View Report
Donavan Smith Creative J	02/03/2025	Management and consulting services	Everett	WA	\$3,000.00	View Report

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Donavan Smith Creative J	03/10/2025	Management and consulting services	Everett	WA	\$3,000.00	View Report
Donavan Smith Creative J	04/08/2025	Management and consulting services	Everett	WA	\$3,000.00	View Report
HENDERSON LAW GROUP, PLLC	05/15/2023	LEGAL & CONSULTING	OLYMPIA	WA	\$2,925.00	View Report
CASSANDRA J FRANKLIN	05/05/2025	Filing fees	Everett	WA	\$2,159.40	View Report
COMMUNICATIONS COUNSEL, INC	06/07/2023	Consulting Invoice 3002108	GRANVILLE	OH	\$2,085.00	View Report
Overnight Printing Seattle	04/25/2025	yard signs and stakes	Seattle	WA	\$1,688.35	View Report
COMMUNICATIONS COUNSEL, INC	05/05/2023	CONSULTING	GRANVILLE	OH	\$1,104.00	View Report
Terra Firma Consulting	07/08/2024	Management and consulting services	Lake Stevens	WA	\$1,000.00	View Report
Terra Firma Consulting	08/15/2024	Management and consulting services	Lake Stevens	WA	\$1,000.00	View Report
Terra Firma Consulting	10/21/2024	Management and consulting services	Lake Stevens	WA	\$1,000.00	View Report

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Terra Firma Consulting	09/08/2024	Management and consulting services	Lake Stevens	WA	\$1,000.00	View Report
Terra Firma Consulting	12/09/2024	Management and consulting services	Lake Stevens	WA	\$1,000.00	View Report
Terra Firma Consulting	12/09/2024	Management and consulting services	Lake Stevens	WA	\$1,000.00	View Report
Apex Art and Culture Center	09/19/2024	Food for campaign event	Everett	WA	\$940.30	View Report
Countryman Signs	04/11/2025	decals for campaign signs	Everett	WA	\$659.40	View Report
Countryman Signs	05/09/2025	yard signs	Everett	WA	\$652.81	View Report
Pattison Scott	05/06/2025	food and beverage for wine club event	Everett	WA	\$600.00	View Report
Neal Ryan	05/06/2025	guitar that was auctioned off at wine club event	Bellevue	WA	\$500.00	View Report
CASSANDRA J FRANKLIN	09/22/2024	supplies for kickoff event on 9/22/24	Everett	WA	\$444.75	View Report
Smith JD	04/24/2025	walking pieces	Everett	WA	\$425.40	View Report

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COLLINGS TIM	09/22/2024	supplies for kickoff event 9/22/24	STANWOOD	WA	\$415.01	View Report
PATTISON SHELLEY	05/06/2025	food and supplies for wine club event	EVERETT	WA	\$400.00	View Report
ZOOM	09/26/2022	CAMPAIGN COMMUNICATION	SAN JOSE	CA	\$329.48	View Report
STRAUB SEAN	04/25/2025	two banners	MUKILTEO	WA	\$304.30	View Report
Countryman Signs	04/18/2025	decals for campaign signs	Everett	WA	\$274.75	View Report
Domain Name Services	08/14/2024	website domain	Jersey City	NJ	\$265.00	View Report
My Everett Media	04/16/2025	headshots	Everett	WA	\$250.00	View Report
USPS	11/13/2024	PO Box	Everett	WA	\$225.00	View Report
4Over, LLC	04/29/2025	walking piece	Glendale	CA	\$221.05	View Report

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SQUARESPACE	03/31/2023	Paid to SQUARESPACE. REIMBURSE NICHOLE WEBBER FOR SQUARESPACE WEBSITE BUILDER ANNUAL SUBSCRIPTION	NEW YORK	NY	\$211.01	View Report
Pattison Scott	08/27/2024	Printed materials	Everett	WA	\$203.48	View Report
STRIPE	05/05/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$184.74	View Report
STRIPE	09/30/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$162.64	View Report
STRIPE	09/25/2023	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$143.53	View Report
Canva	03/29/2022	DESIGN SOFTWARE	San Jose	CA	\$119.99	View Report
COLLINGS TIM	05/03/2025	post driver and yard sign supplies	STANWOOD	WA	\$112.87	View Report
Pacific Copy and Print	04/29/2025	Reimbursement for Thank you cards	Everett	WA	\$110.64	View Report

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STRIPE	05/12/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$108.30	View Report
EXPENSES OF \$200.00 OR LESS	03/01/2025				\$107.41	View Report
STRIPE	12/02/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$105.64	View Report
STRIPE	02/03/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$105.30	View Report
STRIPE	05/28/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$103.00	View Report
STRIPE	09/03/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$91.40	View Report
STRIPE	11/06/2023	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$89.46	View Report
Square, Inc.	05/09/2025	Bank and payment processing charges	San Francisco	CA	\$85.75	View Report

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STRIPE	02/18/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$80.65	View Report
STRIPE	09/23/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$70.20	View Report
STRIPE	11/25/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$67.30	View Report
STRIPE	05/06/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$66.25	View Report
STRIPE	09/18/2023	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$57.45	View Report
STRIPE	07/01/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$51.45	View Report
KING STEVE	10/13/2024	refund check - exceeded contribution limit	SEATTLE	WA	\$50.00	View Report
STRIPE	11/13/2023	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$46.15	View Report

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STRIPE	01/29/2024	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$43.80	View Report
STRIPE	10/07/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$42.95	View Report
STRIPE	07/08/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$42.65	View Report
STRIPE	12/16/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$41.25	View Report
STRIPE	04/08/2024	card processing	SOUTH SAN FRANCISCO	CA	\$39.80	View Report
STRIPE	10/23/2023	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$38.60	View Report
STRIPE	10/15/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$38.30	View Report
STRIPE	11/27/2023	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$35.10	View Report

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STRIPE	04/21/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$34.41	View Report
Donavan Smith Creative J	11/13/2024	Business cards	Everett	WA	\$32.51	View Report
STRIPE	09/09/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$32.50	View Report
STRIPE	12/11/2023	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$29.60	View Report
STRIPE	04/28/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$29.60	View Report
STRIPE	10/10/2023	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$29.30	View Report
STRIPE	06/03/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$27.61	View Report
STRIPE	04/14/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$24.98	View Report

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Donavan Smith Creative J	12/19/2024	acrylic sign holders	Everett	WA	\$23.07	View Report
STRIPE	12/09/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$21.93	View Report
STRIPE	10/21/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$19.33	View Report
STRIPE	10/30/2023	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$18.00	View Report
STRIPE	10/28/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$18.00	View Report
STRIPE	01/06/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$18.00	View Report
STRIPE	06/24/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$16.85	View Report
STRIPE	05/20/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$13.95	View Report

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STRIPE	01/16/2024	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$12.20	View Report
STRIPE	09/16/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$11.90	View Report
STRIPE	04/01/2024	card processing	SOUTH SAN FRANCISCO	CA	\$10.75	View Report
STRIPE	05/27/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$9.89	View Report
STRIPE	08/12/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$9.30	View Report
STRIPE	12/23/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$9.30	View Report
STRIPE	01/22/2024	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$8.15	View Report
STRIPE	07/22/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$7.55	View Report

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STRIPE	07/15/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$7.55	View Report
STRIPE	08/19/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$7.55	View Report
STRIPE	11/04/2024	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$7.55	View Report
STRIPE	01/21/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$6.40	View Report
STRIPE	02/24/2025	Bank and payment processing charges	SOUTH SAN FRANCISCO	CA	\$6.10	View Report
STRIPE	10/02/2023	CARD PROCESSING	SOUTH SAN FRANCISCO	CA	\$3.20	View Report
STRIPE	04/15/2024	card processing	SOUTH SAN FRANCISCO	CA	\$3.20	View Report

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