

Respondent Names
Toshiko Hasegawa
Complainant Name
Conner Edwards
Complaint Description
<p><u>Conner Edwards</u> reported via the portal <i>(Tue, 26 Aug 2025 at 9:38 PM)</i></p> <p>See complaint (attached).</p>
What impact does the alleged violation(s) have on the public?
<p>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. The public disclosure law was enacted through voter approval of Initiative 276 in 1972.</p> <p>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.</p>
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: Toshiko Hasegawa

Submitted: 8/26/2025

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

90 Day Initial Hearing Deadline: 11/24/2025 per RCW 42.17A.755(3)

Statutes Violated: RCW 42.17A.700, .710

Background

Washington State's Personal Financial Affairs 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 personal financial affairs of elected officials. The public disclosure law was enacted through voter approval of Initiative 276 in 1972.

Personal financial information is disclosed on the F-1 report by candidates at the start of the campaign and annually by elected officials, state boards and commissions members, state agency directors, and legislative and gubernatorial professional staff. Appointed officials must file the F-1 report within 2 weeks of being appointed.

This information allows the public to assess whether elected officials may have conflicts of interest.

Violations

This respondent is married to Michael Charles, a political consultant who is a governor of CD Strategic, Inc. On information and belief, CD Strategic does business as Upper Left Strategies. See link: <https://ulstrategies.com/team>

The address of Upper Left Strategies matches the listed address of CD Strategic. See below.

BUSINESS INFORMATION

Business Name: CD STRATEGIC, INC.

Business Type: WA PROFIT CORPORATION

Principal Office Street Address: 506 2ND AVE STE 1400, SEATTLE, WA, 98104-2329, UNITED STATES

Expiration Date: 01/31/2026

Formation/ Registration Date: 01/23/2018

Inactive Date:

UPPER LEFT STRATEGIES

506 2nd Ave #1400 Seattle WA 98104



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Based on this information, it appears that the respondent omitted several campaigns that did business with Upper Left Strategies/CD Strategic above the \$12,000 threshold. See link to list of expenditures: https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/expenditures?recipient_name=upper+left&expenditure_date=01%2F01%2F2024-yadcf_delim-12%2F31%2F2024

Specifically, the following campaigns were omitted from the respondent's most recent 2024 F1 report: Patty Kuderer, Responsible Land Management PAC, Amy Walen, Denny Heck, Eric Pickens, David Hackney, Girmay Zahilay, Melanie Morgan, and No on 2117.

Based on these omissions, I believe that other F1 reports filed for other years are also inaccurate.

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