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Phil Stutzman
Compliance Office
Washington Public Disclosure Commission
711 Capitol Way S. #206
P.O. Box 40908
Olympia, WA 98504-0908
pdc@pdc.wa.gov

Re: PDC Case No. 139384
BIL No.: 3450*008-001

Dear Mr. Stutzman,

I am writing on behalf of the Washington Education Association PAC (WEA-PAC or Committee) to respond to Connor Edwards' July 30, 2025, complaint. I understand that this complaint has been consolidated with PDC Case No. 139384. WEA-PAC is providing the following response to those allegations that are raised for the first time in Mr. Edwards' July 30 complaint. Additionally, the Committee is continuing to work with the PDC to amend its reporting of in-kind contributions, including but not limited to providing additional vendor information.

1. Late filing in violation of RCW 42.17A.235 and .240

Mr. Edwards raises two instances of late filing by the Committee: a C-3 report filed twelve days after the associated deposit (six days late) and a 7-day pre-primary C-4 report filed on July 30, 2025 (one day late).

The Committee's delay in filing these two reports was the result of a week-long office closure in July that created a backlog in the Committee's reporting and compliance work. The C-3 report filed on July 27 for a deposit made on July 15, 2025, disclosed a total of \$2,200 in contributions, made up entirely of \$20 contributions from persons who are recurring PAC donors. Given the small dollar amount of these contributions, and the fact that the identities of these contributors have been disclosed through other C-3 reports filed by the Committee, this six-day delay did not have a material impact on the public. The 7-day pre-primary report, filed just one day after the reporting deadline, was in substantial compliance with the requirements of RCW 42.17A.235(2)(b). *See, e.g.,* Complaint Return Letter in PDC Case No. 30906 (C-4 report filed one day late was in substantial compliance with RCW 42.17A.235(2)).

WEA-PAC has timely filed over one hundred reports in 2025 alone. The Committee's minor delay in filing these two reports were isolated deviations due to unusual circumstances and did not meaningfully impact public disclosure or rise to the level of a material violation.

2. Failure to disclose quantity of umbrellas purchased

Mr. Edwards also alleges that WEA-PAC violated the Fair Campaign Practices Act (FCPA) by failing to disclose the quantity of umbrellas¹ purchased by WEA and in-kind to WEA-PAC on April 30, 2025. Mr. Edwards does not cite the specific provision(s) of the FCPA or accompanying regulations that he believes were violated. And there is no clear basis in the law for requiring disclosure of the number of umbrellas purchased. While WAC 390-16-037 and WAC 390-16-205 offer illustrative examples of expenditure descriptions that include quantities, these examples are not clearly analogous to WEA's umbrella purchase for two reasons. First, WAC 390-16-037 refers to expenditures "made directly to a vendor." Similarly, WAC 390-16-205 offers examples of expenditures "made directly to a vendor" or payments from candidates or political committees to "a consultant or other agent." By their own terms, these examples do not apply to in-kind contributions. Second, the only examples that disclose the quantity purchased involve political advertising. *See* WAC 390-16-037 (Example B – brochures); WAC 390-16-207 (Example A – mail pieces). Here, the umbrellas purchased were promotional items for WEA-PAC and did not constitute political advertising.

Given the lack of clarity in the law as to when quantity is required, and the diminished public interest in such disclosure outside of the context of political advertising, the Committee's failure to report the number of umbrellas in-kind by WEA is not a material violation of the Act. As part of its ongoing efforts to resolve Case No. 139384, WEA-PAC will provide additional disclosure related to the vendor for this purchase and can additionally provide the quantity of umbrellas (and blankets) purchased if so instructed by the PDC.

3. Unspecified violation of RCW 42.17A.320

Mr. Edwards complaint includes RCW 42.17A.320 in the list of statutory provisions allegedly violated by WEA-PAC. However, there is no factual basis provided for this alleged violation. Therefore, this allegation should be dismissed.

For the reasons set forth above, the new allegations raised in Mr. Edwards' July 30 complaint do not rise to the level of material violations of the Act. WEA-PAC continues to work with the PDC to resolve Case No. 139384. Please contact me with any questions or concerns at (206) 644-6002.

Sincerely,



Abby Lawlor
Counsel for WEA-PAC

¹ This contribution consisted of 500 umbrellas and 500 fleece blankets purchased from Lasting Impressions, 1423 6th St., Marysville, WA 98270. These additional purchase details were not available to the Committee at the time of filing.