

Respondent Name(s)
Grays Harbor Democrats
Complainant Name(s)
Conner Edwards
Complaint Description
<p><u>Conner Edwards</u> reported via the portal <i>(Tue, 12 Nov 2024 at 11:44 AM)</i></p> <p>Description of Complaint</p> <p>See attached complaint.</p> <p><u>Notice to Respondent</u></p> <p>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 with a so-called "warning letter".</p> <p>This complaint is one of hundreds 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.</p> <p>What are these shortcomings?</p> <p>Overcomplicated and outdated requirements that are difficult to understand and comply with.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.</p> <p>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.</p> <p>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/</p>

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.

“The journey of a thousand miles begins with a single step.”

— **Lao Tzu**

GRAYS HARBOR DEMOCRATS - 2024 _ Washington State Public Disclosure Commission (PDC).pdf
245.07 KB

GraysHarborDemocratsComplaint.pdf
311.19 KB

What impact does the alleged violation(s) have on the public?

See complaint. The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency’s failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.

List of attached evidence or contact information where evidence may be found

See complaint and also PDC website.

List of potential witnesses with contact information to reach them

See complaint and also PDC website.

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: Grays Harbor Democrats**Submitted:** 11/12/24**Notice to Respondent by:** 11/22/24 per WAC 390-37-050(1)**90 Day Initial Hearing Deadline:** 2/10/25 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

When a political committee makes an expenditure benefitting a candidate appearing on the general election ballot or donates to a committee whose spending benefits a candidate appearing on the general election ballot, the committee becomes obligated to file reports on the same schedule that those candidates must follow.³

Violations

This respondent has had a pending case open against them since 8/25/23. This case had drag on for over a year now with no resolution.⁴

By virtue of the fact that this committee made expenditures supporting general election committees/candidates, the committee became obligated to file the 21- and 7-day pre-general C4 reports. The committee failed to do so, and instead filed the report covering this period on 11/12/24 after the election was already over.

See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110260023>

The report contained \$5,870.00 worth of general election-related expenditures. Additionally, for the large payment to Alpha Media, LLC, there is not a candidate-by-candidate breakdown of how the funds were used to support each particular candidate as required by WAC 390-16-037. It also appears that the respondent failed to provide a breakdown of subvendors. Additionally, it appears that the respondent failed to provide the run-dates of the advertisements, which I know PDC staff believe is required.

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>

³ See RCW 42.17A.235(2) and RCW 42.17A.005(38)

⁴ <https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/141468>

Additionally, it appears these two C3s were filed late

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110260022> and
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110260021>

Let me be clear: I don't believe that this filer intentionally failed to file the required report by the appropriate deadline. However, regardless of their intent, the failure to file reports by the appropriate deadline is a violation.

PDC staff have long known that there is an issue with committees in our state filing reports on the appropriate schedule. Rather than admit the existence of this problem and work with stakeholders to come up with a solution that would solve this problem, the PDC staff have chosen to bury the problem under the rug with a mountain of "reminder" and "warning" letter dismissals.

This must change.

Conclusion

The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.

I urge the PDC staff to take quick action and resolve the noncompliance identified in this complaint.

Best,

Electronically signed Conner Edwards

/s/ Conner Edwards

Complainant

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This complaint is one of hundreds 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.

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GRAYS HARBOR DEMOCRATS

2024

- Overview
- Contributions
- Expenditures
- Pledges
- Debts
- Loans

Committee Overview

Registered September 22, 2005
Democratic County Party
Treasurer is Bethany Whipple-Boling

Committee Contact

PO BOX 1423
ABERDEEN, WA 98520
ghdemocrats@gmail.com
360-470-9691

Financial Overview

\$8,430.34	+	\$22,322.84	+	\$0.00	=	\$30,753.18
Starting balance		Contributions		Loans		Total raised
\$25,005.60				\$0.00		\$0.00
Total spent				Pledges		Debt

Committee Reports and Forms

- Registration Form
- Contributors and Vendors Map

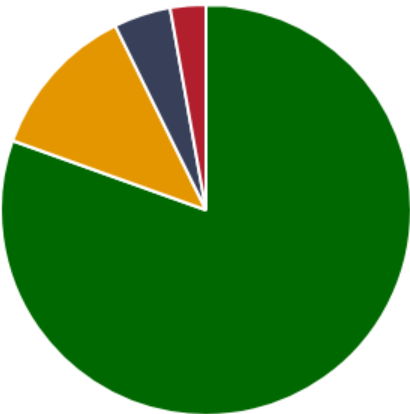
Made to committee for 2024

Contributions

See who has contributed cash and in-kind (non-monetary) contributions to the committee..

Contributions made to committee for 2024

Individual	\$17,965.00
Other	\$2,733.00
Business	\$1,000.00
Party	\$624.84



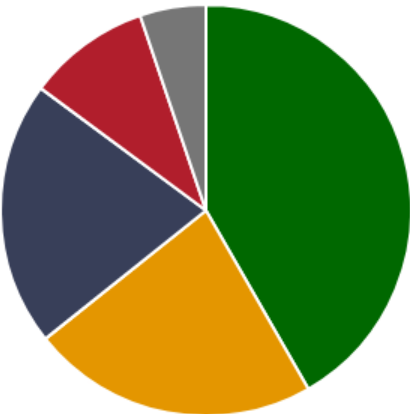
Made by committee for 2024

Expenditures

See how the committee has spent money, and what kind of goods and services it received as in-kind contributions.

Expenditures made by candidate for 2024

Fundraising events and related...	\$10,426.03
Broadcast/cable TV advertising	\$5,650.00
Utilities, phone, and other...	\$5,207.50
Printing campaign signs	\$2,423.00
Miscellaneous	\$1,299.07



Made to committee

Loans

See loans received, forgiven or paid by the campaign.

\$0.00

Held by committee

Debts

See the campaign's debt reporting history.

\$0.00

Campaign Finance Reports

See the reports filed by the committee. Reports with a strikethrough were amended by another report.

Show 25 entries

Download 20 rows as CSV.

Period	Report Number	Filed	Report	Form Type	Election Year
10/15/2024 - 10/15/2024	110260022	11/11/2024	View Report	C3	2024
10/15/2024 - 10/15/2024	110260021	11/11/2024	View Report	C3	2024
10/04/2024 - 10/04/2024	110250933	10/10/2024	View Report	C3	2024
10/01/2024 - 10/31/2024	110260023	11/11/2024	View Report	C4	2024
09/12/2024 - 09/12/2024	110250259	10/08/2024	View Report	C3	2024
09/01/2024 - 09/30/2024	110250934	10/10/2024	View Report	C4	2024
08/05/2024 - 08/05/2024	110236561	08/06/2024	View Report	C3	2024
08/01/2024 - 08/31/2024	110244886	09/11/2024	View Report	C4	2024
07/15/2024 - 07/15/2024	110230378	07/16/2024	View Report	C3	2024
07/01/2024 - 07/31/2024	110238123	08/12/2024	View Report	C4	2024
06/27/2024 - 06/27/2024	110225055	06/28/2024	View Report	C3	2024
06/01/2024 - 06/30/2024	110225056	06/28/2024	View Report	C4	2024
05/01/2024 - 05/31/2024	110221508	06/10/2024	View Report	C4	2024
04/19/2024 - 04/19/2024	110216434	05/21/2024	View Report	C3	2024
04/01/2024 - 04/30/2024	110216435	05/21/2024	View Report	C4	2024
03/08/2024 - 03/08/2024	110204265	03/10/2024	View Report	C3	2024

Period	Report Number	Filed	Report	Form Type	Election Year
03/01/2024 - 03/31/2024	110210304	04/14/2024	View Report	C4	2024
02/07/2024 - 02/07/2024	110210303	04/14/2024	View Report	C3	2024
02/01/2024 - 02/29/2024	110204269	03/10/2024	View Report	C4	2024
01/01/2024 - 01/31/2024	110204268	03/10/2024	View Report	C4	2024

Showing 1 to 20 of 20 entries

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