



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

April 17, 2024

Delivered electronically to Michael Haas at mikehaas123@gmail.com and Chris DeGallier at cdegallier@comcast.net

Subject: Complaint filed by Connor Edwards, PDC Case 147906

Dear Citizens for Kelso Schools Committee:

Below is a copy of an electronic letter sent to Connor Edwards concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Edwards, the PDC reviewed the allegations made against Citizens for Kelso Schools Committee (the Committee) and pursuant to WAC 390-37-060(1)(f) we entered a Statement of Understanding (SOU) with the Committee. PDC staff is in receipt of the signed SOU, and the payment of the \$150 civil penalty assessed in this matter, per WAC 390-37-143 (Brief Enforcement Penalty Schedule). This resolves the violations of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely and accurately disclose contributions and expenditures on campaign reports (C-3 and C-4 reports) for the 2024 special election.

Staff expects the Committee to comply with all campaign laws, rules and PDC guidance in the future. The PDC has dismissed this matter following RCW 42.17A.755(1) and will not take any further enforcement action.

If you have questions, you may contact Tanya Mercier by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

/s/ Electronically signed

Peter Frey Lavallee
Executive Director



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April 17, 2024

Delivered electronically to Connor Edwards at cg.edwards53@gmail.com

Subject: Complaint against Citizens for Kelso Schools Committee, PDC Case 147906

Dear Connor Edwards:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on January 1, 2024. PDC staff opened a case review alleging that Citizens for Kelso Schools Committee, supporting a local ballot measure for the Kelso School District 458 February 2024 Special Election, may have violated RCW 42.17A.235 & .240 for failure to timely and accurately disclose contributions and expenditures on campaign reports (C-3 and C-4 reports) for the 2024 Special Election.

PDC staff reviewed the allegation(s); the applicable statutes, rules, and reporting requirements; the response(s) provided by the Respondent; the applicable PDC reports filed by the Respondent; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- The Respondent, Citizens for Kelso Schools (the Committee), did participate in the 2024 Special Election in support of a local ballot measure. The Committee filed a Political Committee Registration (C-1pc) report with the PDC on April 25, 2020, last amended on August 30, 2023, for the Full Reporting option.
- Per RCW 42.17A.235 and .240, under the Full Reporting option, a committee is required to disclose contribution and expenditure information by submitting Receipts and Expenditures Summary (C-4) reports and Cash Receipts, Monetary Contributions (C-3) reports to the PDC. The Committee's due dates for the C-3 and C-4 reports are determined by its activity and participation in the election cycle.
 - RCW 42.17A. 235(5) & .240(2) identify the threshold for required reporting of the identity of contributors and WAC 390-16-308 further directs campaigns on the reporting of the source of a contribution.
- On February 2, 2024, two C-3s were filed for contributions deposited on October 24, 2023, totaling \$8,000. The deposits were made timely, but the reports should have been submitted by the following Monday after the contributions were deposited. These reports were three months late.

- A corresponding C-4 for the period 10/01/23-10/31/23 was filed on February 2, 2024, but should have been filed in November 2023. This C4 showed \$1,114 in expenditures and \$8,454 in contributions. The report was three months late.
- C-3s for deposits made on November 9, 2023, and November 29, 2023, for contributions totaling \$1,250, were deposited timely but reports were not submitted until February 2, 2024. These reports were three months late.
- The corresponding C-4 for the period 11/01/23-11/30/23 showed \$2,250 in receipts received and no expenditures. The report was submitted on February 2, 2024, but was due in December of 2023. The report was a month and a half late.
- Two C-3s were filed for contributions deposited on December 7, 2023, totaling \$946. One of the C-3s was filed on February 2, 2024, amended March 10, 2024. The other C-3 report was filed on March 10, 2024. Both reports were filed 3 months late and not until after the election.
- A C-3 for a deposit on January 22, 2024, identifying contributions totaling \$200, was submitted on February 2, 2024, but should have been submitted on the Monday following the deposit.
- The 21-day C-4, for the period 12/01/23-01/22/24, was due on January 23, 2024. The campaign filed the report on February 2, 2024, but the expenditure descriptions did not have the required details required for political advertising and the report was not finalized until March 10, 2024, after the election.
- In total, the campaign receipts were \$16,225.69 and expenditures were \$10,391.00.
- The Committee does not have other similar warnings or violations of PDC requirements.

Pursuant to WAC 390-37-060(1)(f), Citizens for Kelso Schools Committee completed a Statement of Understanding (SOU) and paid a \$150 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 and .240 by failing to timely and accurately disclose contributions and expenditures on campaign reports (C-3 and C-4 reports) disclosing contributions and expenditures undertaken by the Committee for the 2024 Special Election. The \$150 penalty assessed resolves these violations.

Based on this information, the PDC finds that no further action is necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, you may contact Tanya Mercier by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

/s/ Electronically signed

Peter Frey Lavallee
Executive Director

cc: Michael Haas and Chris DeGallier