Respondent Name

AARP No on I 2124

Complainant Name

Conner Edwards

Complaint Description

<u>Conner Edwards</u> reported via the portal (Wed, 29 Jan 2025 at 12:04 AM)

Description of Complaint

See attached complaint.

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 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Overcomplicated and outdated requirements that are difficult to understand and comply with.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.

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.

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.

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.



Q Search **≡** Menu

AARP No on I 2124 Sponsored by AARP Washington State 2024

 Overview
 Contributions
 Expenditures
 Pledges
 Debts
 Loans

Committee Overview

Registered March 29, 2024 Statewide Ballot Measure Treasurer is Cathleen MacCaul

Committee Contact

- 18000 International Blvd Seatac, WA 98188
- cmaccaul@aarp.org
- 12062185915

Financial Overview

\$0.00 Starting balance + \$503,799.29 Contributions + \$0.00 Loans = \$503,799.29 Total raised

 \$503,799.29
 \$0.00

 Total spent
 Pledges
 Debt

Committee Reports and Forms

Registration Form

Contributors and Vendors Map

Ballot Propositions Supported for 2024

Supported

Long Term Care Services (2124) proposed for State of Washington

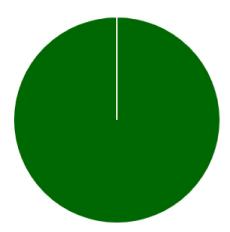


Made to committee for 2024

Contributions

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

Contributions made to committee for 2024



Other \$503,799.29

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

Inkind contribution \$503,799.29

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 ventries

Download 9 rows as CSV.

Period	Report Number	•	Filed 💠	Report 💠	Form Type 💠	Election Year 💠
03/29/2024 - 07/31/2024	110235448		08/02/2024	<u>View Report</u>	C4	2024
08/01/2024 - 08/31/2024	110242508		09/05/2024	<u>View Report</u>	C4	2024
09/01/2024 - 10/14/2024	110249913		10/07/2024	<u>View Report</u>	C4	2024
10/15/2024 - 10/28/2024	110259639		11/08/2024	<u>View Report</u>	C4 - Amended	2024

Period	Report Number •	Filed \$	Report \$	Form Type 💠	Election Year 💠
10/15/2024 10/28/2024	110259354 Amended by: 110259639	11/07/2024	<u>View Report</u>	C4	2024
10/29/2024 - 11/30/2024	110262405	12/06/2024	<u>View Report</u>	C4 - Amended	2024
10/29/2024 11/30/2024	110260399 Amended by: 110262405	11/15/2024	<u>View Report</u>	C4 - Amended	2024
10/29/2024 - 11/30/2024	110259355 Amended by: 110260399	11/07/2024	<u>View Report</u>	C4	2024
12/01/2024 - 12/31/2024	110262406	12/06/2024	<u>View Report</u>	C4	2024
Showing 1 to 9 of 9 ent	ries			Previo	ous 1 Next

Contact Us

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Glossary

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Other Election Agencies

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For Incidental Committees

For Lobbyists

For Elected Officials

For Voters & the Public

Registration & Reporting

Political Disclosure Reporting Data

Rules & Enforcement

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Employment Opportunities





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FILE ONLINE

Complaint Against: AARP No on I 2124

Submitted: 1/29/25

Notice to Respondent Due By: 2/8/25 per WAC 390-37-050(1) **90 Day Initial Hearing Deadline:** 4/29/25 per RCW 42.17A.755(3) **Statutes Violated:** RCW 42.17A.235, .240, WAC 390-16-125

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. 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

Because this committee was opposing an initiative on the 2024 general election ballot, it was required to file an accurate 7 C4 report by 10/29/24. It failed to do so.

The committee filed an original version of the 7-day C4 report on 11/7/24, after the election was already over. See link: https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259354.

An accurate version of the report was not filed until 11/8/24, which was also after the election was already over. See link: https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259639.

The amended version of the report included \$432,830.72 in expenditures/in-kind contributions that were required to have been disclosed before the general election and were not disclosed until after the general election had already ended.

AARP has had a PDC complaint pending against it since August 16, 2024 so it should be well aware of the importance of adhering to the campaign finance requirements of Washington State.

Conclusion

I urge the PDC staff to take quick action and resolve the noncompliance identified in this complai	I urge the PDC staff t	o take quick action	and resolve the nor	ncompliance ident	tified in this complai
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Best,

/s/

Conner Edwards

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

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"You can't make an omelet without breaking a few eggs."

— François de Charette