

Respondent Name
IBEW 112 Political Action Committee
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards reported via the portal (Thu, 17 Oct 2024 at 1:42 PM)</p> <p>Description of Complaint</p> <p>See attached complaint.</p> <p>Notice to Respondent</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Overcomplicated and outdated requirements that are difficult to understand and comply with.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> <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.</p> <p>"Be the change that you wish to see in the world." — Mahatma Gandhi</p>
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.

Key Dates: 2024

These dates are also found on the PDC's [Calendar of Events](#).

[Key dates for 2024 special elections are also available.](#)

Within two weeks of organizing or becoming a candidate	Register the campaign. (Candidates also file an F-1.)
	NOTES: Committees organizing within three weeks of election must register within 3 business days of organizing. File an amended registration within 10 days of any changes.
January 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Dec. 31
February 12	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Jan. 31
March 11	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Feb. 29
April 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through March 31
May 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through April 30
May 6-10	Declaration of candidacy filing week
June 3	Begin filing C-3 reports weekly, each Monday, for deposits made during previous 7 days (Monday through Sunday)
June 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through May 31
June 24	Last day before primary election to change from mini to full reporting without special circumstances (See WAC 390-16-125)
	21-day pre-primary C-4. Candidates appearing on the primary election ballot file a C-4 that covers the period June 1 through July 15. So do committees supporting or opposing candidates.
July 16	Candidates not on the primary election ballot and committees only supporting or opposing general election ballot measures file monthly reports in June, July and August. These reports due on the 10th of the following month.
July 27 - August 5	Campaign books open for public inspection
July 30	7-day pre-primary C-4. Candidates appearing on the primary election ballot and committees participating in the primary file a C-4 that covers the period July 16 through July 29
July 30 - August 5	Special reports due if candidate or committee receives contributions of \$1,500 or more from a single source, or committee makes contributions of \$1,500 or more.
	NOTE: Does not constitute authority to exceed applicable local or state contribution limit
AUGUST 6	PRIMARY ELECTION DAY
August 30	Last day before general election to change from mini to full reporting without special circumstances (See WAC 390-16-125)
	Post-primary C-4 due. Covers the period between July 30 and Aug. 31.
September 10	Candidates not on the primary election ballot and committees that did not participate in the primary file a report for the month of August
October 15	21-day pre-general C-4 report due - report for the period Sept. 1 through Oct. 14.

October 15 - November 4	1. Special reports due if a candidate or political committee receives contributions of \$1,500 or more from a single source, or if a political committee makes a contribution of \$1,500 or more.
	2. A candidate for statewide office may not accept contributions from a single source exceeding \$75,000 in the aggregate unless it is from the state committee of a bona fide major or minor political party.
	3. A candidate for another office or a political committee may not receive contributions from a single source exceeding \$7,500 in the aggregate unless it is from the state committee of a bona fide major or minor political party. The exception is ballot measure committees, which may receive larger contributions.
October 26 - November 4	Campaign books open for public inspection
October 29	7-day pre-general C-4 report due - report for the period Oct. 15 through Oct. 28.
November 4	Last Monday that weekly C-3 reports must be filed for general election
NOVEMBER 5	GENERAL ELECTION DAY
December 10	Post-general C-4 due that covers Oct. 29 through Nov. 30. File C-3s that have not been filed for any deposits made in November.
January 10, 2025	End of election cycle C-4 due that covers Dec. 1 through Dec. 31. File C-3s for any deposits made in December.

Registration & Reporting Basics

[Candidate FAQ](#)

[Training and Resources](#)

[Political Committee FAQ](#)

Registration & Reporting Basics

[Candidate Registration](#)

[Committee Registration](#)

[Choosing Mini or Full Reporting](#)

[Bank Accounts](#)

[Ending a Campaign Before the Election is Held](#)

Key Dates: 2024

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IBEW 112 Political Action Committee: Alleged Violations of RCW 42.17A.235, .240 for failure to timely and accurately disclose contributions & expenditures on reports (EY24 AUG24)

Case

#159741

Respondent

IBEW 112 Political Action Committee

Complainant

Conner Edwards

Description

- Allegation: Violation of RCW 42.17A.235 and .240 for failure to timely and accurately report contributions & expenditures on reports for election year 2024

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

- RCW 42.17A.235(2) states "Each treasurer of a candidate or political committee, or an incidental committee, required to file a statement of organization under this chapter, shall file with the commission a report, for each election in which a candidate, political committee, or incidental committee is participating, containing the information required by RCW 42.17A.240 at the following intervals:
 - On the twenty-first day and the seventh day immediately preceding the date on which the election is held.
- RCW 42.17A.005(38) defines participation to include:
 - Making either a monetary or in-kind contribution to a candidate; and
 - Making an independent expenditure or electioneering communication in support of or opposition to a candidate.
- The Respondent submitted an expenditure report for its July expenses by Aug. 10, the deadline for committee reporting monthly.

Having considered these factors and the applicable statutes, rules, and reporting requirements, the PDC has dismissed this matter following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in these matters.

PDC staff is reminding the Respondent to submit C-4 expenditure reports by the expedited deadlines in RCW 42.17A.235 when it has engaged in activity supporting candidates on the primary ballot.

Disposition

Assessment of Facts

Date Opened

September 26, 2024

Areas of Law

RCW 42.17A.235, RCW 42.17A.240

Documents

- [159741 IBEW 112 Political Action Committee Resolution Letter.pdf](#)
- [159741 IBEW 112 PAC Complaint-1.pdf](#)
- [159741 IBEW 112 PAC Complaint.pdf](#)

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IBEW 112 POLITICAL ACTION COMMITTEE

2024

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

Committee Overview

Registered January 10, 2002
Continuing Committee (Union)
Treasurer is LORI JOHNSON

Committee Contact

114 N. Edison St
Kennewick, Washington 99336
lorij@ibew112.com
509-735-0512

Financial Overview

\$72,662.54	+	\$23,744.00	+	\$0.00	=	\$96,406.54
Starting balance		Contributions		Loans		Total raised
\$27,300.00				\$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..

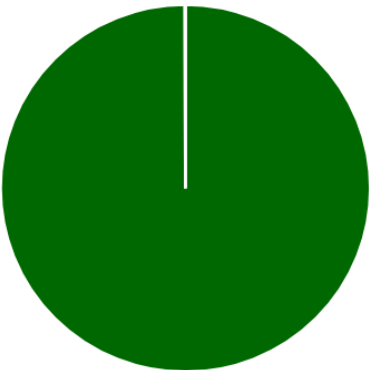
Contributions made to committee for 2024

Other

\$23,754.00

Individual

\$-10.00



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

Monetary contributions to PAC...

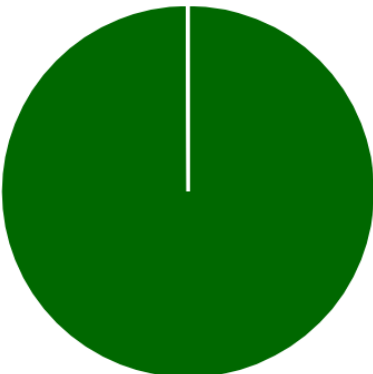
\$27,300.00

Contribution Refunds

\$10.00

Not Provided

\$-10.00



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 18 rows as CSV.](#)

Period	Report Number	Filed	Report	Form Type	Election Year
09/30/2024 - 09/30/2024	110250234	10/08/2024	View Report	C3	2024
09/01/2024 - 09/30/2024	110250235	10/08/2024	View Report	C4	2024
08/31/2024 - 08/31/2024	110242604	09/06/2024	View Report	C3	2024
08/01/2024 - 08/31/2024	110242603	09/06/2024	View Report	C4	2024
07/31/2024 - 07/31/2024	110237553	08/12/2024	View Report	C3	2024
07/01/2024 - 07/31/2024	110237550	08/12/2024	View Report	C4	2024
06/30/2024 - 06/30/2024	110229360	07/15/2024	View Report	C3	2024
06/01/2024 - 06/30/2024	110229359	07/15/2024	View Report	C4	2024
05/31/2024 - 05/31/2024	110223303	06/17/2024	View Report	C3	2024
05/01/2024 - 05/31/2024	110223301	06/17/2024	View Report	C4	2024
04/30/2024 - 04/30/2024	110216493	05/22/2024	View Report	C3	2024
04/01/2024 - 04/30/2024	110216494	05/22/2024	View Report	C4	2024
03/31/2024 - 03/31/2024	110210088	04/11/2024	View Report	C3	2024
03/01/2024 - 03/31/2024	110210087	04/11/2024	View Report	C4	2024
02/29/2024 - 02/29/2024	110204848	03/11/2024	View Report	C3	2024
02/01/2024 - 02/29/2024	110204850	03/11/2024	View Report	C4	2024
01/31/2024 - 01/31/2024	110200389	02/08/2024	View Report	C3	2024
01/01/2024 - 01/31/2024	110200391	02/08/2024	View Report	C4	2024

Showing 1 to 18 of 18 entries

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**Complaint Against: WASHINGTON SELF-INSURERS ASSOCIATION LEGISLATIVE FUND, IBEW
112 Political Action Committee**

Submitted: 10/17/24

Notice to Respondent Due By: 10/27/24 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 1/15/25 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

Reporting History of Respondents

In the last several weeks, I filed complaints against both of these respondents which demonstrated that they failed to submit the required C3/C4 reports that were due according to the reporting schedule they were obligated to follow because of their participation in the primary general election.

Despite the fact that the complaint I filed contained clear evidence that these respondents failed to file reports by the required deadlines, the agency staff dismissed these complaints with so-called "reminder" letters.

The use of reminder letter dismissals (as opposed to warning letter dismissals) to dismiss complaints which accurately identify violations is a cynical misuse of the staff's enforcement powers.

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

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)

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.

Violations

The above referenced 2 respondents “participated” in the 2024 general election by virtue of the expenditures that they made. See URLs listed below and also RCW 42.17A.005(38). As such, these respondent committees were obligated to file C4 reports by the 10/15/24 deadline.

They failed to do so, despite having received reminder letters only a few weeks prior. See attached.

###

Report evidencing IBEW 112 Political Action Committee participation in general election:

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110242603>

Report evidencing WASHINGTON SELF-INSURERS ASSOCIATION LEGISLATIVE FUND participation in general election: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110237556>

Conclusion

With the 2024 general election rapidly approaching, 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 with a so-called “warning letter”.

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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