

Respondent Name
UNITE HERE TIP State and Local Fund
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards reported via the portal (Fri, 15 Nov 2024 at 7:41 AM)</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Overcomplicated and outdated requirements that are difficult to understand and comply with.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>"The journey of a thousand miles begins with a single step." — Lao Tzu</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.



UNITE HERE TIP State and Local Fund Sponsored by UNITE HERE International Union **2021**

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[Loans](#)

Committee Overview

Registered October 4, 2019

Other

Treasurer is Zaina Tannu

Committee Contact

📍 275 Seventh Ave., 16th Floor
New York, NY 10001

✉ ztannu@unitehere.org

📞 212-265-7000

Financial Overview

\$312,924.90	+	\$437,306.17	+	\$0.00	=	\$750,231.07
Starting balance		Contributions		Loans		Total raised

\$732,241.72		\$0.00		\$0.00
Total spent		Pledges		Debt

Committee Reports and Forms

[Registration Form](#)

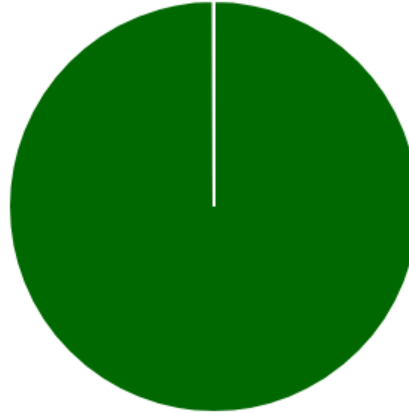
[Contributors and Vendors Map](#)**Made to committee for 2021****Contributions**

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

Contributions made to committee for 2021

Other
\$437,158.27

Business
\$147.90

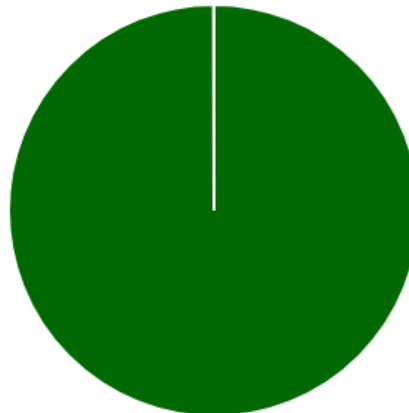
**Made by committee for 2021****Expenditures**

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 2021

Monetary contributions to PAC...
\$732,094.04

Printing literature, fliers,...
\$147.68

**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 entries

[Download 5 rows as CSV.](#)

Period 	Report Number 	Filed 	Report 	Form Type 	Election Year 
09/01/2021 - 09/30/2021	110052098	10/07/2021	View Report	C4	2021
09/02/2021 - 09/02/2021	110052097	10/07/2021	View Report	C3	2021
10/01/2021 - 10/31/2021	110060096	11/02/2021	View Report	C4	2021
10/31/2021 - 10/31/2021	110060095	11/02/2021	View Report	C3	2021
11/01/2021 - 11/30/2021	110063981	12/07/2021	View Report	C4	2021

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Committee Overview

Registered October 4, 2019

Other

Treasurer is Zaina Tannu

Committee Contact

📍 275 Seventh Ave., 16th Floor
New York, NY 10001

✉ ztannu@unitehere.org

📞 212-265-7000

Financial Overview

\$0.00 + **\$0.00** + **\$0.00** = **\$0.00**
 Starting balance Contributions Loans Total raised

\$0.00 **\$0.00** **\$0.00**
 Total spent Pledges Debt

Committee Reports and Forms

[Registration Form](#)

Made to committee for 2022**Contributions**

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

No contributions reported.

Made by committee for 2022**Expenditures**

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

No expenditures reported.

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 entries

[Download 0 rows as CSV.](#)

Period	▲ Report Number	▼ Filed	⬆ Report	⬆ Form Type	⬆ Election Year	⬆
No records found						

There are no reports available for this campaign

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UNITE HERE TIP State and Local Fund Sponsored by UNITE HERE International Union **2023**

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[Loans](#)


Committee Overview


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Financial Overview

\$0.00 + **\$0.00** + **\$0.00** = **\$0.00**
 Starting balance Contributions Loans Total raised

\$0.00 **\$0.00** **\$0.00**
 Total spent Pledges Debt

Committee Reports and Forms

[Registration Form](#)

Made to committee for 2023

Contributions

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

No contributions reported.

Made by committee for 2023

Expenditures

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

No expenditures reported.

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See loans received, forgiven or paid by the campaign.

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Debts

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\$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 0 rows as CSV.

Period	Report Number	Filed	Report	Form Type	Election Year
No records found					

There are no reports available for this campaign

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UNITE HERE TIP State and Local Fund
Sponsored by UNITE HERE International
Union 2024

- OverviewContributionsExpendituresPledgesDebtsLoans

Committee Overview

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Other
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Committee Contact

275 Seventh Ave., 16th Floor
New York, NY 10001

ztannu@unitehere.org

212-265-7000

Financial Overview

\$348,832.55

Starting balance

+

\$200,594.94

Contributions

+

\$0.00

Loans

=

\$549,427.49

Total raised

\$515,255.52

Total spent

\$0.00

Pledges

\$0.00

Debt

Committee Reports and Forms

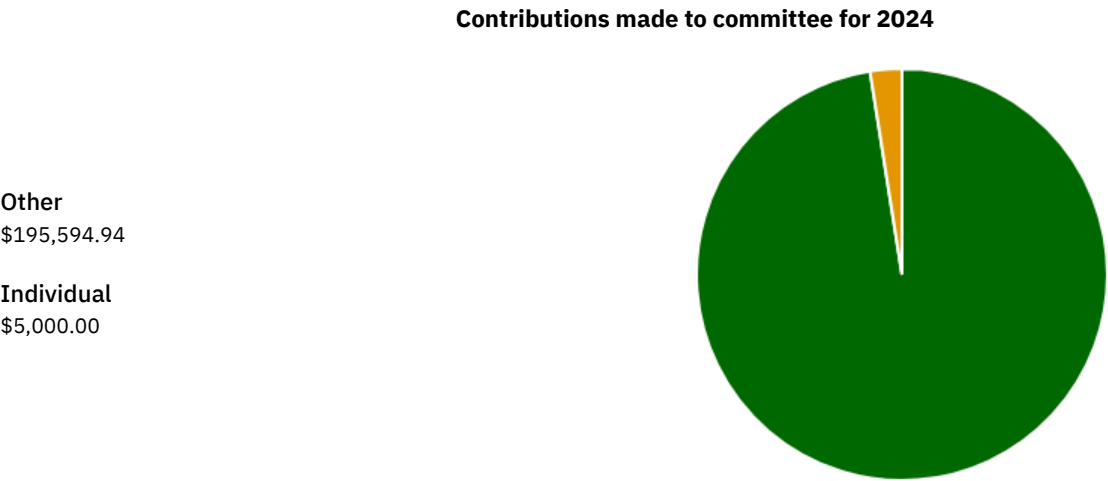
Registration Form

[Contributors and Vendors Map](#)

Made to committee for 2024

Contributions

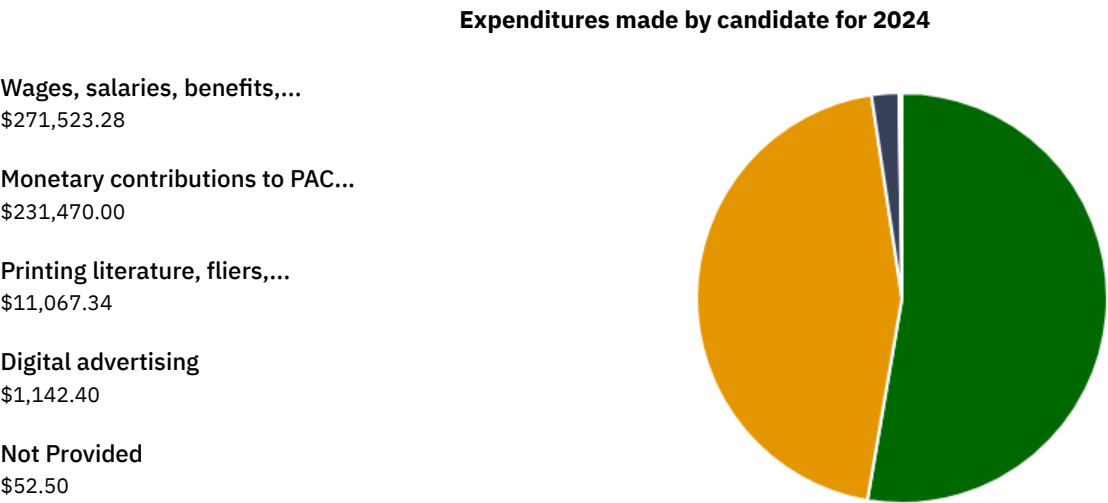
See who has contributed cash and in-kind (non-monetary) contributions to the committee..



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.



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 3 rows as CSV.

Period ^	Report Number v	Filed	Report	Form Type	Election Year
10/01/2024 - 10/31/2024	110260093	11/12/2024	View Report	C4	2024
10/10/2024 - 10/10/2024	110260095	11/12/2024	View Report	C3	2024
10/31/2024 - 10/31/2024	110260094	11/12/2024	View Report	C3	2024

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Complaint Against: UNITE HERE TIP State and Local Fund**Submitted:** 11/15/24**Notice to Respondent by:** 11/25/24 per WAC 390-37-050(1)**90 Day Initial Hearing Deadline:** 2/13/25 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

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/110260093>

The report contained \$515,255.52 worth of expenditures.

Additionally, this C3 for a 10/10/24 deposit (<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110260095>) of \$195,594.94 was only filed after the election. It should have been filed before the election.

Perhaps more concerning, the committee has not filed any reports covering January 2024 to September of 2024. In fact, the committee also filed no reports for 2023 or 2022. The committee last filed reports for 2021, but it failed to file any reports from January to September of 2021. It also failed to file reports for December of 2021. On the committee's last C4 filed in September of 2021, it disclosed a \$17,989.35 cash on hand balance.⁴ Then on the committee's next C4 filed in 2024,

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://web.pdc.wa.gov/rptimg/default.aspx?repno=110063981>

the committee reported an opening balance of \$348,832.55.⁵ This significant discrepancy suggests there have been contributions or expenditures that have not been reported.

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

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.

⁵ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110260093>

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.

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

— Lao Tzu