



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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August 4, 2025

Delivered electronically to judyw46@gmail.com, cg.edwards53@gmail.com and lgdavies@comcast.net

Subject: PDC Case 170468 regarding North Thurston Citizens for Schools

Dear North Thurston Citizens for Schools:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on April 6, 2025. The complaint alleged a violation of RCW 42.17A.235 and .240 for failure to accurately disclose contributions on reports filed in 2024 and 2025 for election year 2028.

Specifically, the complaint alleged that North Thurston Citizens for Schools (the “Respondent”) failed to accurately report the following information: 1) income received on December 6, 2024, from a “Penny Auction” drawing; 2) the names and addresses of the vendors from which individuals purchased the in-kind contributions they made to the Respondent for the purposes of the Penny Auction; and 3) required contributor details on reports, including contributor name and address, occupation, and employer name and address.

Applicable Laws and Rules

[RCW 42.17A.205](#) requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report) within two weeks of organization or the date it first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. A committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on C-3 reports and C-4 reports pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the committee’s election participation¹, and their financial activity.

¹ [RCW 42.17A.005\(38\)](#) defines “participate” to mean that, with respect to a particular election, an entity engages in one or more of the following activities: 1) makes a monetary or in-kind contribution to a candidate; 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate; or 3) engages in an activity described in .005(38)(c), (d) or (e).

Income that results from fundraising activity conducted in accordance with [RCW 42.17A.230](#) that is comprised of cash receipts from persons who each paid no more than \$150² may be reported as one lump sum, with the exception of that portion received from persons whose names and addresses are required to be included in the report pursuant to RCW 42.17A.230. Such fundraising activity includes, but is not limited to, a gambling operation that is licensed, conducted, or operated in accordance with the provisions of RCW 9.46.

Pursuant to [RCW 42.17A.240\(2\)](#), monetary contributions are disclosed on C-3 reports, which must include, but are not limited to: 1) the name and address of each person who contributed more than \$100³ (aggregate) during the period covered by the report; 2) the monetary value and date of each contribution, except for the items specifically mentioned in subsection (2)(a) through (g); and 3) the aggregate value of all contributions received from each person during the campaign. Employer name and address, and the occupation of the contributor are also required on the C-3 report when their aggregate contribution(s) reach more than \$250. “Contribution,” as defined, includes an in-kind contribution, which is disclosed on a C-4 report.

Background and Findings

- North Thurston Citizens for Schools (the “Respondent”) first registered with the PDC as a political committee in 2007. On their most recent C-1pc report (*Political Committee Registration*), filed March 22, 2024, the Respondent 1) registered as a single election committee for election year 2028; 2) selected the full reporting option; and 3) indicated their support for a [North Thurston] school district levy, bond or advisory vote in the April 2028 Special Election.
- The Respondent’s volunteer Treasurer replied to the complaint by email on April 22, 2025, requested assistance amending their C-4 report, and expressed her uncertainty regarding what vendor details are required for in-kind contributions. The Treasurer said the donors who provided goods and services for the Penny Auction drawing did not indicate where they purchased the items and asked for guidance regarding how to proceed without this information. The Respondent also indicated the committee was in the process of transitioning to a new Treasurer and hoped to complete this process by June.
- In subsequent emails, dated April 29, 2025, the Treasurer said the committee had amended some C-3 reports and would continue working with PDC staff to amend their C-4 report. The Treasurer also indicated her belief that the PDC’s expectation that the committee disclose vendor details for the in-kind contributions that individuals donated for the Penny Auction drawing were unreasonable. She added that she was not aware of the requirement to include vendor details for in-kind contributions and would have requested this information from donors had she known. The Treasurer said she would ensure their new Treasurer is made aware of this requirement.

² Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$150 effective April 1, 2023.

³ Per [WAC 390-05-400](#), this dollar amount increased from \$25 to \$100 effective April 1, 2023.

- On May 1, 2025, the Respondent’s Treasurer indicated her belief that 2024 was the first year the committee’s Penny Auction drawing fundraiser exceeded \$5,000. The Treasurer said she was advised several years ago that their event is considered to be a raffle and had subsequently reached out to the Washington State Gambling Commission (WSGC) regarding their requirements. She said, at that time, the WSGC determined the committee did not need a gambling permit due to their composition. Nonetheless, the current Treasurer said she would recommend that their new Treasurer reach out to WSGC again to obtain current guidance.
- The Respondent received a Warning Letter in PDC Case 156124 concerning failure to timely report debt incurred in 2024 for election year 2028.⁴

Allegation: Failure to Accurately Report Contributor Details on C-3 Reports

- The Respondent filed eleven C-3 reports between March 25, 2024, and April 10, 2025, in which the contributor details were either incomplete or not entered in the correct fields. For some entries, the name of the contributor was both an individual and an organization, making the identity of the contributor unclear. Other entries were missing contributor address, occupation, employer name, employer address or a combination thereof.
 - The eleven C-3 reports were amended between April 29, 2025, and June 6, 2025, to correct or complete contributor details.

Allegation: Failure to Accurately Report In-Kind Contribution Vendor Details on C-4 Reports

- On January 8, 2025, the Respondent filed a C-4 report for December 2024 that disclosed several in-kind contributions made to the committee for the purposes of their Penny Auction (drawing); most of these entries lacked the name and address of the vendor from whom the individuals purchased the items they donated.
 - The committee reached out to their in-kind contributors to obtain the missing vendor details and amended their December 2024 C-4 report three times. The amended C-4 report filed on June 4, 2025, represents the sum of available vendor information obtained by the committee for these in-kind contributions.

Allegation: Failure to Accurately Report Penny Auction Income

- On a C-3 report timely filed December 12, 2024, the Respondent disclosed receipt of \$9,040 in proceeds from a “Penny Auction” on Dec. 6, 2024, which was reported as a lump sum (not itemized).

⁴ The Respondent also received a Warning Letter in PDC Case 140433 for inaccurate reporting of in-kind contributions received in 2018 but this activity is outside the statute of limitations.

The complaint alleged that the committee was not permitted to report income from their Penny Auction drawing as a lump sum on a C-3 report pursuant to [RCW 42.17A.230](#) because it was not a gambling operation that was licensed, conducted, or operated in accordance with the provisions of RCW 9.46. The Complainant stated the Penny Auction drawing was a game of chance that raised over \$5,000 in a calendar year and was therefore not a gambling operation based on the laws and rules enforced by the Washington State Gambling Commission (WSGC).

As evidence, the Complainant provided a link to WSGC's [website](#), which states that charities and non-profits are permitted to hold two unlicensed raffles per year if the cumulative gross revenue is not more than \$5,000 per calendar year. However, this dollar amount refers to a licensing exemption and does not state that the activity itself is not a "gambling operation" if it exceeds the \$5,000 threshold.

It is also worth noting that the structure of RCW 42.17A.230(2)(a)(ii) is indicative of three alternatives: gambling operations that are 1) licensed; 2) conducted; or 3) operated in accordance with the statute.

[Emphasis added]

The question of whether the Respondent committee was properly licensed or conducted or operated their Penny Auction drawing as a gambling operation in accordance with RCW 9.46 is a matter that must be determined by the WSGC and does not fall under the jurisdiction or purview of the PDC. Absent evidence showing that the Respondent did not conduct or operate a gambling operation pursuant to RCW 9.46, this allegation is dismissed.

Summary and Resolution

The following mitigating factors apply in this case:

- Your noncompliance appears to be the result of good-faith errors or omissions and a misunderstanding regarding what information is required to be collected and disclosed for in-kind contributions.
- The impact of noncompliance on the public was minimal because your committee has not made any election-related expenditures to date and does not appear to be participating in any elections until 2028. The bulk of the committee's expenditures appear to be in support of fundraising efforts.
- You made a good-faith effort to obtain missing information and took corrective action to amend reports well in advance of election year 2028.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely and accurately disclose monetary and in-kind contributions. PDC staff expect you to timely and accurately report all contributions in the future. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff are also reminding you about the importance of amending reports within 21 days of the original filing, whenever possible, in accordance with PDC laws, rules and guidance. We also encourage you to follow up with the WSGC to ensure your committee is aware of their current requirements under RCW 9.46.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, you may contact Tabatha Blacksmith at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed by Tabatha Blacksmith

Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed by Kim Bradford

Kim Bradford
Deputy Director
For Peter Frey Lavallee
Executive Director

cc: Conner Edwards