



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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September 12, 2025

Delivered electronically to Pacific County Democratic Central Committee at
democratsofpacificco@gmail.com

Subject: PDC Case 171641 regarding Pacific County Democratic Central Committee

Pacific County Democratic Central Committee:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Conner Edwards on May 1, 2025, and September 1, 2025. The complaints alleged violations of: (1) RCW 42.17A.235 & .240 for failure to accurately and timely file contributions and expenditures on C-3 and C-4 reports during calendar years 2024 and 2025; and (2) RCW 42.17A.320 for failure to include complete sponsor identification on the committee's website.

Applicable Laws and Rules

[RCW 42.17A.235](#) describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions, in-kind donations of goods or services, and expenditures made by the campaign.

[RCW 42.17A.240](#) describes the required content of each campaign report including the name and address of each person making contributions and to whom an expenditure was made.

[RCW 42.17A.320](#) requires that all political advertising supporting or opposing a candidate or ballot proposition includes the sponsor's name and address.

Background and Findings

- Pacific County Democratic Central Committee (the Committee) is a bona fide political party committee registered with the PDC during calendar years 2024 and 2025 under the "Full Reporting" option.

March and July 2025 C-4 Reports

- The Committee submitted the March 2025 C-4 report nineteen days late on April 29, 2025. The C-4 report failed to include the required names and addresses of subvendors used for in-kind contributions received during the month.
- On May 30, 2025, the Committee amended the March 2025 C-4 to add subvendor information for twelve of the 23 total in-kind contributions reported, noting that the remaining contributions did not involve subvendors. The C-3 report was corrected fifty days after its original due date.
- The Committee submitted the July 2025 C-4 report fifteen days late on August 25, 2025. The C-4 report included \$15 in monetary deposits and \$1,505.94 in expenditures.

Incomplete Description for C-4 Reports

- On September 9, 2024, the Committee timely submitted the 2024 post primary C-4 report. The report failed to include the number of Harris/Walz signs purchased from Cowlitz County Democratic Central Committee on August 17, 2024.
- The Committee amended the post primary C-4 report on May 21, 2025, to disclose the purchase of 100 Harris/Walz signs.
- On October 15, 2024, the Committee timely submitted the 2024 21-day pre-general election C-4 report. The report failed to disclose the run dates for newspaper advertising paid to EO Media Group.
- The Committee amended the 21-day pre-general C-4 report on May 21, 2025, to add run dates to ads published in the Chinook Observer.

Missing Subvendor Information/Inaccurate Donor Occupation on C-3 Reports

- On March 18, 2025, the Committee timely submitted a C-3 report disclosing \$6,170 in total contributions from auction proceeds and individual donations deposited on March 15, 2025. The complaint alleged that the Committee should have disclosed information about the subvendors used for the auction items donated for the event.
- The Committee amended the March 18, 2025, C-3 report to specifically identify that there were no subvendors for any of the twelve items donated.
- The complaint also alleged that the occupation listed for contributor Kelly Rosenfield was incomplete.
- The Committee amended the March 18, 2025, C-3 report on September 11, 2025, to update Ms. Rosenfield's occupation.

Incomplete Sponsor Identification on Committee Website

- The complaint alleged that the Committee's website, www.democratsofpacificcounty.net, failed to include the required sponsor identification.
- During a review of the Committee's website, staff noted that, while not in strict compliance, there was information regarding the site's sponsor located on the homepage likely sufficient for the public to definitely identify the sponsor and the sponsor's contact details.
- However, per staff's request, the Committee updated the sponsor identification to its website homepage, on September 7, 2025.

Summary and Resolution

Regarding the incomplete C-4 reports for calendar year 2024, it appears that although the Committee omitted details for signs printed and run dates for newspaper advertisement, the instances of these errors were limited. The late March 2025 and July 2025 C-4 reports, and incomplete or inaccurate C-3 report, also for March 2025, had minimal impact on the public. These reports covered a filing period ahead of the 2025 Primary Election, and all but two required amendments were done before the election date as well. Finally, regarding the incomplete sponsor identification on the Committee's website, staff found there was sufficient information for the public to readily identify the sponsor prior to any edits.

After consideration of all the circumstances, further proceedings would not serve the purposes of the Fair Campaign Practices Act. Under WAC 390-37-070, the executive director, at any time prior to consideration by the Commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted. The executive director must report at each regular Commission meeting all complaints dismissed.

Pursuant to WAC 390-37-060(1)(d), however, Pacific County Democratic Central Committee is receiving this formal written warning concerning its failure to accurately and timely file contributions and expenditures on C-3 and C-4 reports during calendar years 2024 and 2025 and failure to include complete sponsor identification on its website. PDC staff expects the Committee to timely and accurately file all future required reports of contributions and expenditures and to adhere to the sponsor identification requirements for future political advertising. The Commission will consider this formal written warning in deciding on further Commission action, if there are future violations of PDC laws or rules.

Any allegations regarding reporting by the Committee for calendar year 2024 that are not otherwise addressed are hereby dismissed.

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 Jennifer Hansen at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Jennifer Hansen
Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

cc: Conner Edwards