



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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Subject: PDC Case 173514 regarding Washington Association of Nurse Anesthetists PAC

Dear Washington Association of Nurse Anesthetists PAC:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Conner Edwards on May 20, 2025, July 18, 2025, and September 1, 2025. The complaints alleged that Washington Association of Nurse Anesthetists PAC (the “Respondent”) violated RCW 42.17A.235 and .240 by failing to timely and accurately report contributions and expenditures on C-3 and C-4 reports in election years 2024 and 2025.

The first complaint alleged 1) a discrepancy between the Respondent’s ending balance for 2024 and beginning balance for 2025; 2) failure to file reports based on the accelerated reporting schedule for 2024 and 2025 election participation; and 3) late reporting. Specifically, Mr. Edwards (the “Complainant”) alleged that 1) monthly C-4 reports for January and April of 2025 and a C-3 report for 4/30/25 were filed late; and 2) the vendor’s address was missing from an April 2025 expenditure. The second complaint alleged the Respondent failed to file a 21-day pre-Primary C-4 report for 2025. The third complaint added allegations of 1) a late C-3 report for 6/30/25; and 3) failure to file a 7-day pre-Primary C-4 report for 2025. As evidence of election participation, the Complainant provided a printout of PDC records showing that 2025 candidates Michelle Caldier and Tina Orwall reported they had received contributions from the Respondent committee.

Applicable Laws and Rules

- A political committee is required to register with the PDC by filing a *Committee Registration* (C-1pc report). A committee that selects the Full Reporting option on their C-1pc report is required to disclose 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 “Participation” means, 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 or a committee for the purpose of supporting or opposing an

- Per RCW 42.17A.235(2), a committee is required to file C-4 reports based on the following accelerated reporting schedule for each election in which they are participating:
 - On the 21st day and 7th day immediately preceding the date on which the election is held. The pre-election reports should disclose all contributions received and expenditures made as of the end of one business day before the date of the report.
 - On the 10th day of the first full month after the election. The post-election report should disclose all contributions received and expenditures made from the closing date of the last report filed through the last day of the month preceding the date of the report.
- Committees may file monthly C-4 reports, due by the 10th day of the following month, for those months during which they are not participating in an election. RCW 42.17A.235(3(a)).
- Pursuant to RCW 42.17A.235(5), committees are required to file C-3 reports on an accelerated weekly reporting schedule² beginning on the first day of the fifth month before the date of the General Election (e.g. June 1st) and ending on the date of the General Election, if they are participating in the election. The weekly C-3 reports should be filed each Monday and disclose bank deposits of monetary contributions made during the previous seven calendar days (Mon.-Sun.).
- Per RCW 42.17A.240(7), a committee's C-4 report should disclose, but not be limited to, the name and address of each person to whom an expenditure was made in the aggregate amount of more than \$200³ during the period covered by the report, as well as the amount, date, and purpose of each expenditure. Person, as defined, includes a vendor.
- Any action brought under Chapter 42.17A must commence within five years after the date the violation occurred. [RCW 42.17A.770](#).

Background and Findings

- The Respondent is a continuing committee that first registered with the PDC in 2007. On the most recent C-1pc report filed by the Respondent prior to this complaint, they selected the Full Reporting option.
- The Respondent participated in the 2024 Primary and General Elections by virtue of making several contributions to candidates participating in those elections.

election-related matter (e.g. ballot measure); 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate or ballot proposition; or 3) engages in an activity described in .005(38)(c), (d) or (e). [RCW 42.17A.005\(38\)](#).

² The accelerated weekly C-3 reporting schedule for Special Elections begins on the first day of the fourth month preceding the date of the Special Election and ends on the date of that election.

³ Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

- The Respondent participated in the 2025 Primary Election by making a \$1,200 contribution to candidate Michelle Caldier on 12/16/24 that was attributed to the 2025 Primary. The Respondent disclosed this contribution on her December 2024 C-4 report. As of the end of September 2025, the Respondent has not made any other contributions to candidates or election-related expenditures for election year 2025⁴.
- On June 15, 2025, the committee sent a written response to the complaint by email, which said:
 - The discrepancy between their ending balance for 2024 and beginning balance for 2025 was due to timing delays inherent in third-party payment processing platforms used for donor contributions and the way such platforms deduct their fees, which creates a gap between recorded donations and actual bank deposits. The former volunteer team responsible for PAC reporting did not fully account for these processing fees during reconciliation and small discrepancies accumulated over time. To improve the accuracy of its reports, the Respondent transitioned to a paid professional management and accounting firm in 2024 that has systematically worked to identify and correct historical discrepancies. With the assistance of PDC staff, their management firm corrected the discrepancy identified in the complaint.
 - The Respondent acknowledged they didn't follow the accelerated C-4 reporting schedule in 2024. Their unintentional error was caused by a lack of awareness about this specific requirement. The committee said it has since conducted a comprehensive review of all PDC reporting requirements and would fully comply with the accelerated pre-election schedule starting in June 2025.
 - Vendor address has been added to the IRS expenditure. The omission of vendor address was caused by the electronic nature of the committee's tax payment transaction, and the Respondent said future reports will include complete vendor information as required.
 - The Respondent said the committee experienced some delays in filing monthly reports due to its transition to a professional management firm, but they have implemented new tracking systems, such as automated reminders and dual review, to ensure consistent, timely reporting moving forward. The committee said they are committed to full transparency and accountability in their political activities, made a good-faith effort to address all the concerns identified in the complaint and implement lasting improvements to their reporting practices.
- On August 27, 2025, the Respondent indicated they were still in the process of fully reconciling and preparing amended reports and had acquired a new, experienced Treasurer. The committee said this time-consuming transition and reconciliation process had led to reporting delays in July and August and explained they were hesitant to file reports that were inaccurate or incomplete.

⁴ The two contributions reported by candidate Tina Orwall's campaign in 2025 were transfers of prior-year contributions from a surplus funds account, as noted on her reports. The committee made one contribution to 2026 candidate Dave Paul in January of 2025, which was refunded 17 days later.

- The Respondent was cooperative throughout our assessment of the complaint and took corrective action as needed.
- The Respondent does not have any previous warnings or violations of RCW 42.17A.235 or .240 within the last five years.
 - A previous case (54840) alleged violations of RCW 42.17A.220 regarding anonymous contribution limits in 2016-2019, for which the Respondent received a Warning Letter. However, this activity is outside the 5-year statute of limitations.
 - In another prior case (153899), the Respondent acknowledged a violation of RCW 42.17A.640 regarding grassroots lobbying in 2024 by signing a *Statement of Understanding* (SOU) and paying a \$300 civil penalty.

Allegation: Inaccurate Carryforward Balance (2024 or 2025)

- The ending balance reported on the committee's December 2024 C-4 report was \$9,575.80 and the beginning balance reported on their original January 2025 C-4 report was \$7,969.81. These dollar amounts should match. The Respondent amended their January C-4 report on 6/13/25 to correct the discrepancy in their 2025 beginning balance.

Allegation: Failure to File C-4 Reports Based on Accelerated Reporting Schedule (2024 & 2025)

- The Respondent committee failed to file pre- and post-election C-4 reports based on the accelerated reporting schedule for a committee participating in the **2024** Primary and General Elections. Instead, the Respondent submitted monthly C-4 reports for June through November in 2024.
- The Respondent filed pre- and post-election C-4 reports based on the accelerated reporting schedule for a committee participating in the **2025** Primary Election.

Allegation: Failure to File C-3 Reports Based on Accelerated Reporting Schedule (2024 & 2025)

- In **2024**, C-3 reports were required to be submitted weekly from June 3, 2024-November 4, 2024. Five of the committee's C-3 reports were not filed on a weekly basis in 2024 as required.
- In **2025**, C-3 reports were/are required to be submitted weekly from June 2, 2025-November 3, 2025. However, as of the end of September 2025, three of the committee's C-3 reports were not filed on a weekly basis as required.

Allegation: Late Reports (2024)

- The committee's monthly C-4 reports for January-March of 2024 were 79, 51 and 21 days late respectively, but partially mitigated by minimal non-itemized expenditures.
- The monthly C-4 reports for April and May of 2024 were timely filed.

- The Respondent filed a monthly C-4 report for June 2024 on July 9, 2024 but the information disclosed therein was timely because it was made publicly available (via the filing of a monthly report) before the 21-day pre-Primary C-4 report (covering 6/1/24-7/15/24) would have been due (7/16/24).
- A monthly C-4 report for July 2024 was submitted on August 9, 2024, after the 2024 Primary Election, containing information that was disclosed 10-24 days late based on when the 21-day pre-Primary C-4 report and 7-day pre-Primary C-4 report (covering 7/16/24-7/29/24) were due (7/16/24 & 7/30/24). Late-reported election-related expenditures included a \$1,200 contribution made to candidate Janet St. Claire and a \$500 contribution to candidate Curtis King.
- The committee filed a monthly C-4 report for August 2024 on September 10, 2024, but the information disclosed therein was timely because it was made publicly available (via the submission of a monthly report) the same date that the post-Primary C-4 report (covering 7/30/24-8/31/24) would have been due (9/10/24).
- A monthly C-4 report for September 2024 was filed on October 31, 2024, four days before the 2024 General Election, containing information that was disclosed 16 days late based on when the 21-day pre-General C-4 report (covering 9/1/24-10/14/24) was due (10/15/24). Late-reported election-related expenditures included a \$2,400 in contribution made to candidate Patty Kuderer, a \$1,200 contribution to candidate Heather Koellen, and a \$1,200 contribution to candidate My-Linh Thai.
- The Respondent submitted a monthly C-4 report for October 2024 on November 5, 2024, the date of the 2024 General Election, containing information that was disclosed 7-21 days late based on when the 21-day pre-General C-4 report and 7-day pre-General C-4 report (covering 10/15/24-10/28/24) were due (10/15/24 & 10/29/24). Late-reported election-related expenditures included four \$500 contributions made to candidates Liz Berry, Julia Reed, Jessica Bateman, and Tarra Simmons, a \$1,000 contribution to candidate Terri Niles, and four \$1,200 contributions to candidates Joe Schmick, Dave Paul (2 total), and Marla Keethler.
- The committee filed a monthly C-4 report for November 2024 on December 10, 2024, but the information disclosed therein was timely because it was made publicly available (via the filing of a monthly report) the same date that the post-General C-4 report (covering 10/29/24-11/30/24) would have been due (12/10/24).
- The monthly C-4 report for December 2024 was filed 33 days late. Late-reported election-related expenditures included one \$500 contribution to candidate Rebecca Saldana, three \$1,000 contributions to candidates Ron Muzzall, Paul Harris, and April Connors, and seven contributions of \$1,200 each to candidates Ed Orcutt, Michelle Caldier, Clyde Shavers, Tina Orwall, Brian Burnett, Keith Goehner, and Mike Steele. A \$500 contribution was also made to John Lovick for his 2026 campaign.
- Ten C-3 reports for deposits made 1/31/24-12/31/24 were filed 1-79 days late.
- Three C-3 reports for deposits made on 4/10/24, 5/31/24 and 11/30/24 were timely filed.

Allegation: Late Reports (2025)

- The Respondent's monthly C-4 reports for January and April of 2025 were filed 22 and 8 days late respectively. These reports were alleged in the complaint.
- The committee's monthly C-4 reports for February, March, May and September of 2025 were timely filed.
- A 21-day pre-Primary C-4 report (covering 6/1/25-7/14/25) was filed 57 days late, after the 2025 Primary Election, but is partially mitigated by a lack of election-related expenditures. This report was alleged in the complaint.
- A zero-dollar 7-day pre-Primary C-4 report (covering 7/15/25-7/28/25) was submitted 43 days late, after the 2025 Primary Election, but is mitigated by a lack of contribution and expenditure activity. This report was alleged in the complaint.
- The post-Primary C-4 report (covering 7/29/25-8/31/25) was timely filed.
- Seven C-3 reports for deposits made 1/17/25-8/31/25 were filed 3-38 days late. These included the two late C-3 reports alleged in the complaint.
- Three C-3 reports for deposits made 2/28/25-9/30/25 were timely filed.

Allegation: Insufficient Expenditure Details on a C-4 Report (2025)

- An entry made on the committee's original November 2024 C-4 report for an expenditure to the "IRS" lacked vendor address. The Respondent amended the report on June 17, 2025 to include vendor address.
- An entry made on the committee's original April 2025 C-4 report for an expenditure to the "IRS" lacked vendor address. The Respondent amended the report on 6/3/25 to include vendor address.

Summary and Resolution

Noncompliance appeared to be the result of good-faith omissions and a misunderstanding regarding the need to file accelerated pre- and post-election reports (in 2024), which are partially mitigating. Other mitigating factors include the relatively modest expenditures involved (in 2025), and the relatively small and unsophisticated nature of your committee overall.

Aggravating factors include the C-4 report for July 2024, which was submitted after the Primary Election, and the C-4 report for October 2024, which was filed on the day of the General Election, both of which deprived the voting public of information regarding election-related expenditures during a time-sensitive period in the election cycle. The C-4 report for September 2024 was filed four days before the General Election and may have likewise deprived some voters of crucial information.

You completed a Statement of Understanding (SOU) and paid a \$600 civil penalty on November 19, 2025 in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging

violations of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely file the 21-Day pre-Primary, 21-day pre-General, 7-day pre-General, and December C-4 reports for election year 2024. The \$600 penalty assessed resolves the allegations concerning these late reports.

In addition, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely and accurately disclose all contribution and expenditures on C-3 reports in 2024 and 2025, C-4 reports for 2025, and the remaining C-4 reports for 2024 that were not resolved under the aforementioned SOU. PDC staff expect you to timely and accurately file required reports of contributions and expenditures 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.

You also made a minor or ministerial error on a required C-4 report, which did not materially harm the public interest. You made the necessary technical correction to amend your committee's carryforward starting balance for 2025 to match your ending balance for 2024 within 2-14 days of being notified by PDC staff, as required for a matter resolved as a technical correction. See WAC [390-37-060](#).

PDC staff is reminding you about the importance of including complete expenditure description details on C-4 reports, including vendor address, in accordance with the PDC laws, rules or guidance.

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 Peter Frey Lavalley
Peter Frey Lavalley
Executive Director

cc: Conner Edwards