



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

October 8, 2025

Delivered electronically to todd@phccwa.org and kimberly@kimberlykean.com

Subject: PDC Case 175852 regarding Plumbing Heating Cooling Contractors of Washington State PAC

Kimberly Kean:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on July 11, 2025. The complaint alleged violations of: RCW 42.17A.235 and .240 for failing to timely and accurately report contributions and expenditures in election year 2024 and prior to the primary in 2025.

Applicable Laws and Rules

Pursuant to [RCW 42.17A.235\(3\)\(a\)](#), each treasurer of a candidate or political committee is required to file a report on the tenth day of each month during which they are not participating in an election campaign only if the committee 1) received a contribution or made an expenditure in the preceding calendar month; and 2) either total contributions received or total expenditures made since the last such report exceed \$750.

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 \$100 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. "Contribution," as defined, includes an in-kind contribution, which is disclosed on a C-4 report.

Background and Findings

- The committee is registered as a Continuing Committee under the Full Reporting option.
- The committee participated in the 2024 election by contributing to candidates and had \$19,745 in receipts and \$36,476 in expenditures. Most of the 2024 Receipts & Expenditure Summary (C-4) reports were submitted with substantial compliance to deadlines, although the required 21- and 7-day pre-primary and pre-general reporting were not completed because the Respondent stayed on a monthly reporting schedule. Similarly, most Cash Receipts, Monetary Contributions (C-3) reporting in 2024 was submitted with substantial compliance to deadlines, although starting on June 3, the Respondent did not convert from monthly reporting to weekly reporting so C-3

reports for June, July, August, September, October, and November were filed late, as they were still filed on a monthly schedule.

- The committee is participating in the 2025 election by contributing to candidates and up to the primary election had raised \$8,900 in receipts and expended \$4,403. The C-4 reports up until the primary election period were submitted with substantial compliance to deadlines, but the required 21- and 7-day pre-primary reports were not submitted because the committee incorrectly stayed on a monthly reporting schedule. The post-primary C-4 submitted on September 2, 2025, was for the month of August rather than the post-primary period of July 29 to August 31. The following C-3 reports were submitted late:
 - Four reports for the month of May were submitted 1 month late on July 10, 2025.
 - Four reports for the month of June were submitted late when filed on July 10, 2025, rather than weekly.
 - The committee remained on a monthly reporting cycle, rather than weekly, for reports submitted in July, and four reports were late when filed on August 8, 2025.
 - In August, one report due on August 18 and another due on August 29, were submitted late on September 2, 2025.
- 2024 and 2025 C-4 reports were amended on August 11, 2025, to add the address for vendors QuickBooks and Diane Jensen, Bookkeeping.
- The committee does not have previous warnings or violations of similar PDC requirements.

Summary and Resolution

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purposes of this chapter. Under WAC 390-37-060, 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 failure to convert from monthly reporting to the 21- and 7-day, and post-election reporting periods, when the monthly reports are submitted timely, does not amount to a finding of a violation that warrants further investigation in this instance.

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning failure to timely disclose of all contribution and expenditures and provide required vendor details. PDC staff expects that you will follow all PDC regulations and rules 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.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, contact Tanya Mercier, Compliance Officer by e-mail at pdc@pdc.wa.gov.

Sincerely,
/s/ Electronically signed
Tanya Mercier
Compliance Officer

Endorsed by,
/s/ Electronically signed
Peter Frey Lavallee
Executive Director

cc: Conner Edwards