



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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October 8, 2025

Delivered electronically to brandon.franck@hotmail.com, Chairman

Subject: PDC Case 175873 regarding Southwest Washington Firefighters PAC

Brandon Franck:

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 the 2024 and 2025 elections.

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 received a warning in 2024, for case #156305, that dealt with late reporting for January through June 2024. A second warning was issued for case #159065, dealing with late reporting through the remainder of the election. The second warning was issued because the committee had not had the benefit of receiving the first warning in time to take corrective action before the second warning was issued. For the current allegations related to the 2024 election, it is determined those issues have been previously addressed by the warnings issued in 2024 and are herein dismissed.

- In 2025, the committee is in substantial compliance with reporting timelines specific to the primary election with one exception: The May Receipts & Expenditure Summary (C-4) report was filed July 9, 2025, one month late. There were no expenditures in May and the corresponding Receipts, Monetary Contributions (C-3) reports were filed timely. The committee also did not participate in the primary election.

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 file a timely contributions and expenditure report in May does not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning failure to timely disclose contributions and expenditures. PDC staff expects that you will timely file all future required reports of contributions and expenditures. 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 by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed
Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed
Peter Frey Lavalley
Executive Director

cc: Conner Edwards