



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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December 11, 2025

Delivered electronically to lmartin@merchantscredit.com and cg.edwards53@gmail.com

Subject: PDC Case 176584 regarding Washington Collectors Association - PAC

Dear Washington Collectors Association - PAC:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards (the “Complainant”) on July 16, 2025. The complaint alleged that Washington Collectors Association - PAC (the “Respondent”) violated RCW 42.17A.235 and .240 by failing to timely and accurately report contributions and expenditures in 2024 and 2025.

Specifically, the complaint alleged the following:

- The committee’s January 2025 C-4 report was filed late and their 21-day pre-Primary C-4 report (covering 6/1/25-7/14/25) had not been filed;
- A reimbursed expenditure on the Respondent’s February 2025 C-4 report did not include the name and address of the vendor;
- Reporting was inaccurate based upon a discrepancy between the campaign’s starting balance for 2025 and their ending balance for 2024; and
- The committee’s 2024 post-Primary C-4 report (covering 7/30-8/31) was filed late.

Applicable Laws and Rules

- A political committee is required to register with the PDC by filing a *Political 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](http://RCW42.17A.235) & [RCW 42.17A.240](http://RCW42.17A.240). The due dates for these reports are

based upon the election cycle, the committee's election participation¹, and their financial activity.

- 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 schedule 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 that election. 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.). Special Elections are subject to a different accelerated C-3 reporting schedule.
- 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 \$200² during the period covered by the report, as well as the amount, date, and purpose of each expenditure. Person, as defined, includes a vendor.

Background and Findings

- The Respondent is a continuing committee that first registered with the PDC in 2011. On its most recently filed C-1pc report (*Political Committee Registration*), dated 9/22/20, the Respondent selected the Full Reporting option.

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

- The committee participated in the 2025 Primary and General Elections by virtue of making six contributions (expenditures) to candidates in those elections. The committee participated in 2024 elections, making a significant number of contributions (expenditures) to candidates in 2024³.
- On July 30, 2025, the Respondent first replied to the complaint by telephone and said they had been filing reports monthly, instead of based on pre- and post-election due dates, which PDC staff determined were required based on the committee's Primary Election participation. The committee requested help from staff to correct the reporting schedule in their ORCA (Online Reporting Campaign Activity) account. They explained that their bank records were not available until the 9th of each month and this recurring delay led to late monthly reports. Finally, they indicated their belief that an error on their January 2025 C-4 report led to the discrepancy in their carryforward total.
- In their written response to the complaint, dated August 4, 2025, the Respondent confirmed that they had completed the tasks requested by PDC staff, including amending their January and February C-4 reports and filing two pre-Primary election C-4 reports for 2025. The committee indicated 1) the discrepancy in its 2025 beginning balance, which was caused by a deposit that had been reported incorrectly, had been fixed; and 2) vendor name and address had been added to the February expenditure. The Respondent also said they had obtained a login that allowed them to view their bank statements earlier, on the first of each month, so they could file reports more quickly.
- The campaign was cooperative throughout our assessment of the complaint, and the Respondent took corrective action as needed.
- The Respondent does not have a previous warning/violation of RCW 42.17A.235 or .240. However, the committee did resolve a prior case (124154) concerning a violation of RCW 42.17A.630 (lobbyist employer reporting requirements) in 2022 with a *Statement of Understanding*.

Late Reporting (2025)

The Respondent's reporting history for 2025 reveals the following information:

- Five monthly C-4 reports for January-May of 2025 were filed 2-39 days late. The late January report disclosed a \$1,200 contribution (expenditure) made to candidate Kevin Schilling for the 2025 Primary Election. The late report for January was alleged in the complaint.
- A 21-day pre-Primary C-4 report (covering 6/1/25-7/14/25) was filed 20 days late and one day before the 2025 Primary Election. This late pre-Primary report disclosed \$2,435 in expenditures, including two \$1,200 contributions, made to candidates Schilling and Michelle Caldier for the

³ The \$1,000 contribution to candidate Cindy Ryu in 2024 was transferred, with the Respondent's permission, to her Senate race in election year 2026.

2025 General Election⁴. The late C-4 report was alleged in the complaint and is partially mitigated by 1) the candidates' timely disclosure of the Respondent's contributions on their respective C-3 reports; and 2) the disclosure of the contributions well in advance of the General Election.

- A 7-day pre-Primary C-4 report (covering 7/15/25-7/28/25) was filed 6 days late, one day before the 2025 Primary Election. This late report is partially mitigated by the minimal nature of the financial activity disclosed, which comprised \$15 in non-itemized expenditures. No contributions were received.
- The committee's post-Primary and 21-day pre-General C-4 reports were timely filed.
- A 7-day pre-General C-4 report (covering 10/14/25-10/27/25) was filed 8 days late, on the date of the 2025 General Election. This late zero-dollar report is partially mitigated by a lack of financial activity.
- Three C-3 reports for deposits dated 1/1/25, 1/24/25 and 8/29/25 were filed 8-171 days late.

Late Reporting (2024)

The committee's reporting history for 2024 shows the following:

- Five monthly C-4 reports for January-May of 2024 were filed 38-96 days late.
- A 21-day pre-Primary C-4 report (covering 6/1/24-7/15/24) was filed 9 days late and before the 2024 Primary Election.
- A 7-day pre-Primary C-4 report (covering 7/16/24-7/29/24) was filed one day late and before the 2024 Primary Election.
- A post-Primary C-4 report (covering 7/30/24-8/31/24) was filed 10 days late. The late report was alleged in the complaint.
- The committee's 21-day pre-General C-4 report (covering 9/1/24-10/14/24) and End-of-Election Cycle C-4 report (covering Dec.) were both timely filed.
- A 7-day pre-General C-4 report (covering 10/15/24-10/28/24) was filed one day late and before the 2024 Primary Election.
- A post-General C-4 report (covering 10/29/24-11/30/24) was filed one day late.
- Eleven C-3 reports for deposits dated 1/24/24, 2/14/24, 3/28/24, 5/2/24, 5/22/24, 5/31/24, 6/26/24, 7/15/24, 8/21/24, 8/26/24, and 10/2/24 were filed 2-66 days late.

⁴ The report was subsequently amended to disclose a \$1,200 contribution to a third candidate that was later refunded.

- Three C-3 reports for deposits dated 7/24/24, 10/11/24, and 12/11/24 were timely filed.

Alleged Inaccurate Reporting (2024 and 2025)

The complaint alleged that the Respondent's reports were inaccurate because the committee's starting balance for 2025 (\$122,141.32) did not match their ending balance for 2024 (\$119,391.32), a difference of \$2,750.

- On August 4, 2025, the Respondent amended their C-4 report for January 2025 to correct the dollar amount for their beginning balance to match their ending balance for 2024. As they indicated in their response to the complaint, the difference in dollar amounts was caused by a deposit that had been reported incorrectly.

Alleged Insufficient Expenditure Description (2025)

- On August 4, 2025, the committee amended their C-4 report for February 2025 to include the name and address of the vendor for a \$476,87 reimbursed expenditure for "meals."

Summary and Resolution

Noncompliance appeared to be the result of good-faith errors or omissions. Delays in receiving financial records from your bank contributed to late reporting, which your committee has since taken steps to remedy.

Three late pre-election C-4 reports for 2025 were received one day before or on the day of the election, which is an aggravating factor because it deprived the public of information during a time-sensitive period in the election cycle. However, these reports were also partially mitigated by minimal or no expenditure activity and other mitigating factors that minimized their impact on the public. Your committee's total expenditures for 2025 were relatively modest overall, which is also mitigating.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely disclose all contributions and expenditures on C-3 and C-4 reports in 2024 and 2025. PDC staff expect you to timely and accurately file all required 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 are reminding you about the importance of including complete expenditure description details on C-4 reports, including vendor name and 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