



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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October 14, 2025

Delivered electronically to voteyesshorelineschools@gmail.com

Subject: PDC Case 176787 regarding Citizens for Shoreline Schools

Lisa Surowiec:

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Conner Edwards on July 11 and July 30, 2025. The complaints alleged violations of: RCW 42.17A.205, .220, .235 and .240, and .320 for failure to identify the committee sponsor in 2025, failure to deposit contributions within five business days of receipt in 2025, failure to timely and accurately report contributions and expenditures in 2022, 2023, 2024 and 2025, and failure to provide sponsor identification on political advertising in 2025.

Applicable Laws and Rules

[RCW 42.17A.205](#) requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report) within two weeks of organization or the date it first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. Among other things, a committee is required to report the name and contact information for all related or affiliated committees and the nature of the relationship or affiliation. If a committee is sponsored pursuant to [WAC 390-16-011A](#), the sponsor's name shall be included in the name of the sponsored committee on the C-1pc report.

Pursuant to [RCW 42.17A.205](#) and [WAC 390-16-011A](#), a committee, organized to support or oppose a particular candidate or ballot measure, is considered sponsored if at the time a statement of organization is submitted, eighty percent or more of contributions received in the previous twelve months are from a person or the person's members, officers, employees or shareholders. Also, a political committee must amend its C-1pc sixty days before an election, in which it participates, if the committee has received eighty percent or more of its contributions from a person or from the person's members, officers, employees, or shareholders.

Pursuant to [RCW 42.17A.220](#), all monetary contributions received by a candidate or political committee shall be deposited by candidates, political committee members, paid staff, or treasurers in a depository in an account established and designated for that purpose. Such deposits shall be made within five business

days of receipt of the contribution. For online or credit card contributions, the contribution is considered received at the time the transfer is made from the merchant account to a candidate or political committee account, except that a contribution made to a candidate who is a state official or legislator outside the restriction period established in RCW [42.17A.560](#), but transferred to the candidate's account within the restricted period, is considered received outside of the restriction period.

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 *Cash Receipts, Monetary Contributions* (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 *Receipts & Expenditure Summary* (C-4) report.

Pursuant to [RCW 42.17A.320](#), all written political advertising must include the name and address of the sponsor. Sponsor identification should appear on the first page or fold of the political advertising, in at least ten-point type, and be set apart from any other printed matter. [WAC 390-18-010](#) indicates that all advertising must clearly state that it has been paid for by the sponsor. Political advertising undertaken as an independent expenditure or an electioneering communication by a person other than a bona fide political party must also include the statement "No candidate authorized this ad. It is paid for by (name, address, city, state)." Additional disclosures may be required, depending on the sponsor and type of advertising used.

Background and Findings

- The committee submitted a C-1pc on June 4, 2025, under the Full Reporting option. The committee was organized in support of a Shoreline School District 412 ballot measure on the ballot in the 2025 primary election.
- To the allegation of a violation of RCW 42.17A.205 in 2025, a committee is required to determine sponsorship only at the time they initially file a registration and 60 days before an election. If, at the time of registration, the Committee has previously received 80% of contributions from a sole source within 12 months of a recent registration, they have triggered the requirement to include the sponsor's name in the committee's name. In this instance, the committee submitted a C-1pc registering as a single election committee on June 4, 2025. The last time an entity calling itself Citizens for Shoreline Schools registered was in 2022. This committee also registered as a single election committee, so even though Citizens for Shoreline schools behaves as a quasi-continuing committee, it is technically not, and counting the 2022 committee's contributions toward the 2025 committee's requirement for sponsorship would not

be appropriate. Also, if a committee has received 80% of contributions from a sole source 60 days before an election, this also triggers the requirement to include the sponsor's name in the committee's name. Since the committee in 2022 is more than 12 months prior to the current registration, the 2022 contributions do not need to be considered when determining sponsorship. The allegation is dismissed.

- For the allegation of a violation of RCW 42.17A.220 in 2025, after review of the case materials PDC staff have determined the Respondent reported the date on the contribution checks rather than the date the contributions were received. The Respondent has corrected the reporting and there is no compliance issue related to the period between when the contributions were received and deposited. The allegation is dismissed.
- For the allegation of missing expenditure data and vendor address per RCW 42.17A.240 and WAC 390-16-037, C-4 report 110077120, submitted on March 13, 2022, was missing the vendor address, quantity and run dates for robocalls. On September 10, 2025, the Respondent amended the report to include the vendor address and run dates but could not provide the quantity of calls because they no longer have that data. *You are hereby reminded, per RCW 42.17A.235(8), that books of account and financial records are to be kept for not less than five calendar years.*
- For the allegation of a violation of RCW 42.17A.235 and .240, for missing reporting in 2023 and 2024, the Respondent has indicated that Citizens for Shoreline Schools did not run any campaigns during this period. The allegation is dismissed.
- For the 2025 reporting, PDC staff found the following:
 - C-3 report 110301925, reporting \$1,250 in funds deposited was submitted one week late but before the election.
 - The 21-day pre-primary C-4 report, 1108302785, was initially submitted timely, on July 15, 2025, but then amended on July 29, 2025, reporting a previously undisclosed expenditure for \$2,000 in postage. The amendment occurred before the election.
 - The 7-day pre-primary report, 110302786, was submitted timely but did not include the quantity of postcards purchased. The report was amended to include the quantity on September 7, 2025, after the election.
 - The Complainant alleged missing reporting for an expenditure on yard signs. The post-primary C-4 report, 1103115115, was submitted timely and included an expenditure to the committee Treasurer as reimbursement for yard signs purchased from Capitol City Press. The purchase date for the yard signs of July 29, 2025, was the same date as the reimbursement date. The expenditure was reported timely and before the election.
 - The Respondent repurposed yard signs from the 2010 election year, for a different ballot measure, and failed to report the in-kind contribution to the 2025 committee. C-4 report, 110316525, submitted on September 26, 2025, identified two hundred yard-signs' reuse. This disclosure was after the election.
- PDC staff found the reused yard signs did not include complete sponsor identification, and the issue was not remedied prior to the 2025 primary election. The Respondent also used newly

purchased yard signs in the 2025 primary election, and those signs were compliant with sponsor identification. The old signs have been retired and will not be reused.

- The Respondent 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 evidence does not support the 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 all contributions and expenditures and required expenditure details, failure to maintain records for a minimum of five years, and failure to provide sponsor identification on political advertising. The formal written warning includes staff's expectation that you comply with all applicable laws and rules in the future. The Commission will consider a 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 pdc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed
Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed
Peter Frey Lavalley
Executive Director

cc: Conner Edwards