



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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December 22, 2025

Delivered electronically to Shannon Turner at electshannonturner@gmail.com

Subject: PDC Case 176789 regarding Shannon Turner

Shannon Turner:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on July 30, 2025. The complaint alleged violations of: (1) RCW 42.17A.235 and .240 by failing to timely and accurately disclose contributions and expenditures; and (2) RCW 42.17A.320 by failing to include complete sponsor identification on political advertisement.

Applicable Laws and Rules

[RCW 42.17A.235](#) and [RCW 42.17A.240](#) require candidate committees to file timely, accurate reports of contributions and expenditures. A committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on C-3 reports and C-4 reports. The due dates for these reports are based upon the election cycle, the committee's election participation, and their financial activity.

[RCW 42.17A.320](#) requires that all political advertising supporting or opposing a candidate or ballot proposition includes the sponsor's name and address unless exempt.

Background and Findings

- On May 23, 2025, Shannon Turner (the Respondent) submitted a C-1 report declaring their candidacy for School Director for Bremerton School District 100-c in the 2025 election, selecting the "Full Reporting" option and listing Danielle Turner as Treasurer. The C-1 was amended on July 24, 2025, to remove the previous officer and identify the Respondent as Treasurer and the only officer.
- The Respondent won in the primary election and appeared on the general election ballot.
- The complaint alleged: (1) failure to timely file a C-3 report disclosing deposits made during June and July 2025 and failure to include the complete address for donors disclosed on the C-3 report; (2) failure to timely submit the C-4 report covering May 1 to 31, 2025; and (3) failure to include complete sponsor identification on the Respondent's campaign website.

Late & Inaccurate C-3 Reports

- On July 24, 2025, the Respondent filed the first C-3 report of the 2025 campaign cycle disclosing \$1,450 in itemized contributions and \$20 in small contributions deposited on May 30, 2025. The C-3 report was filed 44 days late.
- On July 17, 2025, the Respondent timely submitted a C-3 report disclosing a \$2,770 deposit made on July 16, 2025; however, some of the contributions did not include a complete mailing address for donors. On December 4, 2025, the C-3 report was amended to include the full mailing addresses for all donors giving more than \$100 in the aggregate.
- Although not part of the complaint, PDC staff noted that the C-3 report submitted on July 17, 2025, included contributions received but not deposited within the required five business days.

Late C-4 Report

- On July 24, 2025, the Respondent submitted a C-4 report, disclosing \$2,060 in total contributions and \$590 in total expenditures made in connection to in-kind loans from the candidate during May 2025.
- On July 22, 2025, the Respondent timely submitted a C-4 report covering July 15 – 28, 2025, but failed to disclose the required expenditure details.
- On December 4, 2025, the C-4 was amended to include the number of signs and t-shirts purchased from Express Mail LLC.

Insufficient Sponsor Identification

- During a review of the Respondent's website staff noted that it contained partial sponsor identification including the name of the candidate and general contact information.
- Upon receipt of the complaint, the Respondent made the necessary corrections to their website to include the complete required sponsor identification language.

Summary and Resolution

The Respondent has run for office once before but has not served in an elected or appointed position. Although the Respondent failed to timely file campaign reports, failed to include the number of items purchased and the complete address for campaign donors, the reports included limited campaign activity, and the late reports were filed prior to the primary election date. It appears that the late and inaccurate disclosure of the Respondent's campaign activity was due to inexperience and lack of knowledge of PDC laws and rules regarding the campaign's reporting requirements.

Regarding the insufficient sponsor identification on the Respondent's campaign website, PDC staff found that the website included some information as to the identity of the sponsor so a member of the public could reasonably ascertain the name of the sponsor. PDC staff found no evidence that the late or

incomplete reporting and incomplete sponsor ID was done purposely to conceal information from the public.

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 purpose 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.

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning failure to timely and accurately disclose all contribution and expenditures. Staff expects that you timely and accurately file all future required reports of contributions and expenditures and ensure that political advertising includes any applicable sponsor identification. 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 Jennifer Hansen at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Jennifer Hansen
Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

cc: Conner Edwards