

Written Comment by Conner Edwards  
October PDC Regular Meeting

## **1) Reporting Schedule Proposal – Statement of Participation**

I support the proposal described in staff's October memo where PACs would be required to file a statement of participation by January 1<sup>st</sup> of each year. The proposal to allow PACs to amend their statement of participation up until July 1<sup>st</sup> is also a good idea.

But this is the issue that the Commissioners should consider: what will happen to PACs that incorrectly indicate that they are not participating in an election and fail to file the appropriate expedited reports? Based on past experiences, my expectation is that the PDC will largely do nothing against filers that fail to file the appropriate reports by the deadline other than issue a flurry of "warning letters" and "reminder letters" which have no deterrence effect whatsoever.

Washington State's campaign finance laws are, on paper, some of the strongest pro-transparency laws in the US. However, the law is only as strong as the entity that enforces it. If a violation of our state's campaign finance laws is punished ~95% of the time only by a sternly written copy-and-paste letter from staff, the PDC can't seriously claim to have one of the most pro-transparency regulatory systems in the US.

Washington's strong campaign transparency laws – coupled with the PDC's weak, ineffectual enforcement – actually puts our state at the bottom of the barrel.

The PDC (and more specifically the Commissioners) should get into the habit of discussing expectations for enforcement results at the time it is considering changes to requirements.

## **2) Reporting Schedule Proposal – Additional C4 Reports**

The idea of filing C4 reports on the 10<sup>th</sup> and the 25<sup>th</sup> continues to be a problematic idea for treasurers because it would require the filing of additional reports during time periods well before ballots are mailed out. This is asking too much from treasurers.

Generally, treasurers are supportive of the idea of one additional C4 report leading up to the general election (previous agency proposals have included an additional C4 report at the ~33 pre-election mark). If the agency's current proposal is submitted to the agency, I will seek to have the bill amended in committee to only include one additional C4 report at the 33 day pre-election mark.