



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

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Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcca.wa.gov](http://www.pdcca.wa.gov)

BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action  
Against

AARP No on I 2124 Sponsored by AARP  
Washington State

Respondent.

PDC Case 158257

Notice of Administrative Charges

**I. JURISDICTION**

The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure laws; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC.

**II. ALLEGATION(S)**

PDC Staff alleges that, during the period March 29 through Nov. 30, 2024, Respondent AARP No on I 2124 Sponsored by AARP Washington State violated RCW 42.17A.235 and 42.17A.240 by: (1) failing to timely and accurately report the receipt of in-kind contributions from AARP Washington State; and (2) failing to timely provide complete descriptions of in-kind contributions received during its campaign to defeat statewide initiative 2124.

**III. FACTS**

1. On March 29, 2024, the Washington State chapter of AARP created the Political Committee “AARP No on I 2124 Sponsored by AARP Washington State” (the Committee). The Committee opposed statewide initiative 2124 that sought to make funding for the state’s long term care program voluntary instead of mandatory. The Committee’s treasurer was Cathy MacCaul, AARP Washington State’s Advocacy Director. The Committee received in-kind

contributions totaling \$506,945.29 during the period March 29 through Nov. 30, 2024 from AARP Washington State. The Committee received no monetary contributions.

### **Late Reporting**

2. C-4 Report, 3/29/24 – 7/31/24, filed 8/2/24 (Report #110 235 448) This report was the initial C-4 report filed by the Committee, consisting of in-kind contributions totaling \$17,415. Of this amount, contributions totaling \$3,245 were received April 30, 2024 and were required to be reported by May 10, 2024, but were reported 84 days late on Aug. 2, 2024. In-kind contributions totaling \$4,345 were received May 31, 2024 and were required to be reported by June 10, 2024, but were reported 53 days late on August 2, 2024.
3. C-4 Report, 9/1/24 – 10/14/24, filed 10/7/24 (Report #110 249 913) This report was the original 21-day pre-general election C-4 report that was timely filed, disclosing \$30,718.57 in in-kind contributions. However, the report failed to include an in-kind contribution of \$2,750 that was received on Oct. 7, 2024 described as “TVW – Cable ads, digital ads on website. Rotated by station.” This additional \$2,750 in-kind contribution was required to be reported by Oct. 15, 2024 but was reported 111 days late on Feb. 3, 2025, 90 days after the general election, on amended Report #110 269 953.
4. In addition, the final amended 21-day pre-general election report, C-4 Report, 9/1/24 – 10/14/24, filed 2/6/25 (Report #110 270 515) included additional in-kind contributions totaling \$390,000 (\$125,000 received Oct. 1, 2024 and \$265,000 received Oct. 4, 2024) for political advertising that included radio spots that ran from Oct. 1 to Nov. 5, 2024 and digital video commercials in multiple media outlets that ran from Oct. 4 to Nov. 5, 2024. These in-kind contributions were initially reported on the original 7-day pre-general election C-4 report, due Oct. 29, 2024 but filed on Nov. 8, 2024, 10 days late and three days after the Nov. 5, 2024 general election. However, because these in-kind contributions, totaling \$390,000, were required to be reported by Oct. 15, 2024, on the 21-day pre-general election C-4 report, they were reported 24 days late and three days after the general election.

5. C-4 Report, 10/15/24 – 10/28/24, filed 11/8/24 (C-4 Report #110 259 639) This report was the original 7-day pre-general election C-4 report that initially reported the in-kind contributions totaling \$390,000, initially reported as received on Oct. 28, 2024, as part of in-kind contributions totaling \$432,830.72. The \$390,000 in in-kind contributions were later removed from the 7-day pre-general election C-4 report and included on the final, amended, 21-day pre-general election C-4 report, and reported as received on Oct. 1 and Oct. 4, 2024.
6. The original 7-day pre-general election C-4 report also included in-kind contributions totaling \$42,830.72, later amended to \$43,221.72, that were reported 10 days late and three days after the general election.

**Table of Late Reporting**

<b>Amount of In-Kind Contributions Reported Late</b>	<b>Days Late</b>	<b>Days After General Election</b>	<b>Relevant C-4 Report &amp; Exhibit Number</b>
\$3,245.00	84	NA	3/29-7/31/24; Report #110 235 448; Exhibit 5
\$4,345.00	53	NA	3/29-7/31/24; Report #110 235 448; Exhibit 5
\$2,750.00	111	90	9/1-10/14/24; Report #110 269 953; Exhibit 8
\$390,000.00	24	3	9/1-10/14/24; Report #110 270 515; Exhibit 9
\$43,221.72	10	3	10/15-10/28/24; Report #110 259 639 Exhibit 10
<b>(Totals)</b> \$443,561.72	10-111	0-90	

**Inadequate Descriptions of In-Kind Contributions**

7. C-4 Report, 3/29/24 – 7/31/24, filed 8/2/24 (Report #110 235 448) The initial C-4 report filed by the Committee consisted of in-kind contributions totaling \$17,415. Of this amount, \$8,315 was for AARP staff time, stating “AARP staff time on No on I 2124,” listing the names of the employees but not describing the work performed by the employees; \$2,850

was described as print and online advertising in the May 2024 edition of Third Act Magazine; and \$6,250 was described as “KING 5 ‘New Day’ July 17, TVW general long term care rotators during months.” The report was amended on Feb. 3, 2025 (Report #110 269 951) to add \$5 to staff time, and to provide the number of hours worked along with more detailed descriptions of the work performed.

8. C-4 Report, 8/1/24 – 8/31/24, filed 9/5/24 (Report #110 242 508) This C-4 included in-kind contributions totaling \$13,660. Of this amount, \$7,410 was for AARP staff time, listing the names of the AARP employees without describing the work performed; and \$6,250 was described as “New Day and TVW.” This C-4 was amended on Feb. 3, 2025 with Report #110 269 952) to provide more detailed descriptions of the work performed.
9. C-4 Report, 9/1/24 – 10/14/24, filed 10/7/24 (Report #110 249 913). This C-4 was the original 21-day pre-general election C-4 report that was due by Oct. 15, 2024. It included in-kind contributions totaling \$30,718.57. Of this amount, \$11,115 was for AARP staff time, listing the names of the AARP employees without describing the work performed; \$2,827.57 was described as “GMMB Production;” \$2,850 was described as “3<sup>rd</sup> Act Magazine;” and \$13,926, was described as “New Day (King 5), TVW, KXLY-TV.”
10. On Feb. 6, 2025, Ms. MacCaul filed Report #110 270 515, to amend the previous amendment of the 21-day pre-general election C-4 report. In addition, with PDC staff permission, Ms. MacCaul used the Attach a Note function when filing Report #110 270 515, to supplement previously reported in-kind contribution descriptions on original and amended C-4 reports covering activities in June, July, August, September, October, and November 2024.

#### **IV. Law and Rules**

**RCW 42.17A.225, .235 and .240** require candidates, political committees, and continuing political committees to file timely, accurate reports of contributions and expenditures, including in-kind contributions/expenditures, including the name and address of each person who has made one or more contributions during the period, together with the money or in-kind value, the date of each contribution, and the aggregate value of all contributions received from each person during the campaign, or in the case of a continuing political committee, the current calendar year, with certain exceptions. In-kind contributions must include a detailed description of the



contribution, including the name and address of vendors where contributed goods or services were purchased, and if applicable, the same information for subvendors used by vendors.

Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$750 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same time period and must be disclosed on Monday for contributions deposited during the previous seven days.

**WAC 390-16-207** concerns the reporting of in-kind contributions (1) An in-kind contribution must be reported on the C-4 report. An in-kind contribution, as that term is used in the act and these rules, occurs when a person provides goods, services or anything of value, other than money or its equivalent, to a candidate or political committee free-of-charge or for less than fair market value, unless the item or service given is not a contribution according to RCW 42.17A.005 or WAC 390-17-405. An in-kind contribution includes an expenditure that: ***“Supports or opposes a candidate or a ballot measure.”*** (Emphasis added.)

RESPECTFULLY SUBMITTED this 14<sup>th</sup> day of March 2025.

*Electronically Signed Peter Frey Lavallee*  
Peter Frey Lavallee  
Executive Director



## State of Washington

### PUBLIC DISCLOSURE COMMISSION

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#### BEFORE THE PUBLIC DISCLOSURE COMMISSION OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH  
RCW 42.17A

AARP No on 2124 Sponsored by AARP Washington  
State

Respondent

PDC Case 158257

Report of  
Investigation

#### I. Background, Allegations/Complaints, and Response to Complaints

##### Background

- 1.1 **RCW 42.17A.225, .235 and .240** require candidates, political committees, and continuing political committees to file timely, accurate reports of contributions and expenditures, including in-kind contributions/expenditures. These reports must include the name and address of each person who has made one or more contributions during the period, together with the money or in-kind value, the date of each contribution, and the aggregate value of all contributions received from each person during the campaign, or in the case of a continuing political committee, the current calendar year, with certain exceptions. In-kind contributions must include a detailed description of the contribution, including the name and address of vendors where contributed goods or services were purchased, and if applicable, the same information for subvendors used by vendors.
- 1.2 Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$750 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same time period and must be disclosed on Monday for contributions deposited during the previous seven days.

- 1.3 **WAC 390-16-037** requires political committees to disclose the purpose of expenditures reported under RCW 42.17A.240, including the name of any candidate supported or opposed by the expenditure, and the details of goods and services to be provided by the recipient of the expenditure.

Additional statutory and regulatory authority is collected at the end of the Report of Investigation.

### **Allegations/Complaints/Initial Hearing (Case Status Review)**

#### **Complaint 1 (Exhibit 1)**

- 1.4 On August 2, 2024, Conner Edwards filed a complaint with the Public Disclosure Commission (PDC) alleging that the initial C-4 report filed by AARP No on 2124 Sponsored by AARP Washington State (the Committee), covering the period March 29 to July 31, 2024, disclosed in-kind contributions totaling \$17,415, received in April, May, and June 2024, that were not disclosed until Aug. 2, 2024. The complaint alleged that the C-4 was a merged report that should have been filed as separate reports for April by May 10, 2024 and for May by June 10, 2024. The complaint also alleged that the report failed to provide adequate descriptions of the in-kind contributions.

#### **Response to Complaint 1 (Exhibit 2)**

- 1.5 On Aug. 23, 2024, Cathy MacCaul responded on behalf of the Committee, stating:

“AARP created a Political Action Committee called ‘AARP No on I 2124 Sponsored by AARP Washington State’ on March 29, 2024. Reports were filed each month for work starting in March 2024 showing the in-kind contributions and media purchases AARP had made. On July 30, a colleague told AARP Washington State that their activity was not showing up on the public PDC site. Research was done to try to resubmit the report but it required PDC assistance. AARP Washington called the PDC on August 2 and left a voicemail. AARP Washington was contacted by Scott Hailey, a PDC filing specialist, the same day. He saw that reports had been submitted but they were sitting in a folder on the Public Disclosure Commission (PDC) ORCA (Online Reporting Campaign Activity) tool and had not been submitted to the public facing site. Mr. Hailey resolved the issue and the reports were posted.”

- 1.6 The response to the complaint went on to state:

“As to the complaint’s allegations that the filed reports do not provide sufficient detail for the general public to determine the exact nature of expenditures, AARP would point to the history of the complainant, who has made well-known that he utilizes the complaint process to advance a public policy position to improve campaign finance transparency. AARP stands by the details in the reports filed, which satisfy the statutory requirements of Title 42 of the RCW. If the PDC wishes to delineate new requirements, AARP is happy to work to those new standards as well.”

### **Initial Hearing (Case Status Review)**

- 1.7 On Nov. 8, 2024, pursuant to RCW 42.17A.755 and WACs 390-37-060 and 390-37-071, after having conducted a preliminary review and assessment of the complaint filed on Aug. 2, 2024, alleging that the Committee may have violated RCW 42.17A.235 and .240 by failing to timely and accurately report contributions and expenditures, PDC staff opened a formal investigation and held an Initial Hearing (Case Status Review).

### **Complaint 2 (Exhibit 3)**

- 1.8 On Jan. 29, 2025, Conner Edwards filed an additional complaint, alleging that the Committee failed to timely file its 7-day pre-general election C-4 report. The second complaint alleged that the C-4 report covering the period Oct. 15 to Oct. 28, 2024, due Oct. 29, 2024, was not filed until Nov. 8, 2024, 10 days late and three days after the Nov. 5, 2024 general election. The complainant noted that the amended version of the report included \$432,830.72 in expenditures, reported late as in-kind contributions from AARP Washington State.

### **Response to Complaint 2 (Exhibit 4)**

- 1.9 On Feb. 6, 2024, Cathy MacCaul responded, stating that the late-reported 7-day pre-general election C-4 report was an oversight on her part. Ms. MacCaul said she vaguely remembered a reference to a need to file the 7-day pre-general election C-4 report, outside of the regular reporting schedule, but did not receive any reminder about the importance of the upcoming deadline.

## **II. Investigative Findings**

- 2.1 On March 29, 2024, the Washington state chapter of AARP created a political committee called “AARP No on I 2124 Sponsored by AARP Washington State.” As the name implies, the Committee was formed by AARP Washington to oppose statewide initiative 2124, an initiative to make funding of the state’s long term care program voluntary instead of mandatory. The Committee registered and reported as a single election committee, with reportable activity from March 2024 through the Nov. 5, 2024 general election. The Committee’s treasurer was Cathy MacCaul, AARP Washington’s Advocacy Director. Ms. MacCaul was responsible for timely reporting the Committee’s contributions and expenditures, including amendments to the descriptions of in-kind contributions. The Committee received no monetary contributions. All activities were in-kind contributions planned and executed by AARP Washington, on behalf of the Committee.
- 2.2 As noted by Ms. MacCaul in her response to the initial complaint, the Committee’s first C-4 report was filed Aug. 2, 2024 for activities spanning the period March 29 to July 31, 2024. The reported activities, planned and paid for by AARP Washington, consisted of the fair market value of AARP staff time supporting the Committee’s efforts to oppose I-2124, and for media purchases. Ms. MacCaul stated that on July 30, 2024, a colleague told her the Committee’s activities were not appearing on the public-facing PDC website, which prompted Ms. MacCaul to attempt to resubmit the missing report. However, Ms. MacCaul said she required PDC assistance, which she received from Scott Haley, PDC Filer Assistance Specialist, on Aug. 2, 2024. Ms. MacCaul said Mr. Haley resolved the issue and the reports were posted.

#### **C-4 Reports filed by the Committee**

- 2.3 C-4 Report, 3/29/24 – 7/31/24, filed 8/2/24 (Report #110 235 448) (**Exhibit 5**) The initial C-4 report filed by the Committee consisted of in-kind contributions totaling \$17,415. Of this amount, \$8,315 was for AARP staff time, stating “AARP staff time on No on I 2124,” listing the names of the employees but not describing the work performed by the employees; \$2,850 was described as print and online advertising in the May 2024 edition of Third Act Magazine; and \$6,250 was described as “KING 5 ‘New Day’ July 17, TVW general long term care rotators during months.” The report was amended on Feb. 3, 2025 (Report #110 269 951) to add \$5 to staff time and to provide the number of hours worked along with more detailed descriptions of the work performed.
- 2.4 C-4 Report, 8/1/24 – 8/31/24, filed 9/5/24 (Report#110 242 508) (**Exhibit 6**) This C-4 included in-kind contributions totaling \$13,660. Of this amount, \$7,410 was for AARP staff time, listing the names of the AARP employees without describing the work performed; and \$6,250 was described as “New Day and TVW.” This C-4 was amended on Feb. 3, 2025 with Report #110 269 952, to provide more detailed descriptions of the work performed.
- 2.5 C-4 Report, 9/1/24 – 10/14/24, filed 10/7/24 (Report #110 249 913) (**Exhibit 7**). This C-4 was the original 21-day pre-general election C-4 report that was due by Oct. 15, 2024. It included in-kind contributions totaling \$30,718.57. Of this amount, \$11,115 was for AARP staff time, listing the names of the AARP employees without describing the work performed; \$2,827.57 was described as “GMMB Production;” \$2,850 was described as “3<sup>rd</sup> Act Magazine;” and \$13,926, was described as “New Day (King 5), TVW, KXLY-TV.”
- 2.6 Report #110 249 913 was amended by Report #110 269 953 on Feb. 3, 2025 to include \$2,750 received Oct. 7, 2024 for “TVW – Cable ads, digital ads on website. Rotated by station.” (**Exhibit 8**)
- 2.7 Report #110 269 953 was amended by Report #110 270 515 on Feb. 6, 2025 (**Exhibit 9**) to include an additional \$390,000 (\$125,000 on Oct. 1, 2024 and \$265,000 on Oct. 4, 2024) of in-kind contributions for various media related expenditures previously reported on the original 7-day pre-general election C-4 report, due Oct. 29, 2024 but filed on Nov. 8, 2024, 10 days late and three days after the Nov. 5, 2024 general election. Report #110 270 515 also included “Report Notes/Attachments of AARP Additional Documentation for No on I-2124 Campaign” to provide a detailed description of in-kind contributions not adequately described in other reports. The in-kind contributions totaling \$390,000 reported on the amended 21-day pre-general election C-4 report were required to be reported by Oct. 15, 2024 but were reported 24 days late on Nov. 8, 2024 and three days after Nov. 5, 2024 general election.
- 2.8 C-4 Report, 10/15/24 – 10/28/24, filed 11/8/24 (C-4 Report #110 259 639) (**Exhibit 10**) Report #110 259 639 amended Report #110 259 354 to become the original 7-day pre-general election C-4 report. It included in-kind contributions totaling \$432,830.72. The report was due Oct. 29, 2024 but was filed 10 days late and three days after the Nov. 5, 2024 general election. Of this amount, \$3,500 was described as, “New Day Northwest

Interview on voter engagement with website to AARP website;" \$9,815 was for AARP staff time, listing the names of the AARP employees, along with the hours worked and a description of the work performed; \$7,676 for "KXLY;" \$8,500 for "Brother Doug Media Production;" \$13,339.72 described as, "Senior Publication Statewide;" \$125,000 described as, "Radio ads KRWM, KSWD, KPNW, KKWF, KJEB, KICR, KXLY, KEYF, 10/1 to 11/5;" and \$265,000 described as, "Washington Post, CNN, Optimum, Sinclair, Bidtellect, StackAdapt 10/4 to 11/5." On Feb. 3, 2025, Report #110 259 639 was amended by Report #110 269 954 to include an additional \$391 for "Senior Publication Statewide."

- 2.9 On Feb. 17, 2025, Report #110 269 954 was amended by Report #110 272 548 (**Exhibit 11**) making it the final 7-day pre-general election C-4 report, covering the period Oct. 15 to Oct. 28, 2024. Report #110 272 548 reduced in-kind contributions by \$390,000 to \$43,221.72, because the same \$390,000 was included in the final, amended, 21-day pre-general election C-4, Report #110 270 515.
- 2.10 C-4 Report, 10/29/24 – 11/30/24, filed 12/6/24 (C-4 Report #110 262 405) (**Exhibit 12**) Report #110 262 405, filed Dec. 6, 2024, was the post-general election C-4 report. It included in-kind contributions totaling \$9,175. Of this amount, \$2,925 was for AARP staff time, listing the names of the AARP employees, along with the hours worked and a description of the work performed; and \$6,250 was described as, "New Day Northwest \$3,500 TVW Rotators, \$2,750 linked to AARP No on I2124 website." Report #110 262 405 was amended by Report #110 269 955 to increase the Line 1 starting balance to match the Line 8 ending balance from the previous report, an increase of \$396.
- 2.11 C-4 Report, 12/1/24 – 12/31/24, filed 12/6/24 (Report #110 269 956) (**Exhibit 13**) Report #110 269 956 reported no activity and was the committee's final report for the campaign.

**Table of Late Reporting**

<b>Amount of In-Kind Contributions Reported Late</b>	<b>Days Late</b>	<b>Days After General Election</b>	<b>Relevant C-4 Report &amp; Exhibit Number</b>
\$3,245.00	84	NA	3/29-7/31/24; Report #110 235 448; Exhibit 5
\$4,345.00	53	NA	3/29-7/31/24; Report #110 235 448; Exhibit 5
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\$390,000.00	24	3	9/1-10/14/24; Report #110 270 515; Exhibit 9
\$43,221.72	10	3	10/15-10/28/24; Report #110 259 639 Exhibit 10
<b>(Totals)</b> \$443,561.72	10-111	0-90	

### **Filer Assistance Concerning Amending C-4 Reports**

- 2.12 On Aug. 16, 2024, PDC Filer Assistance Specialist Scott Haley contacted Cathy MacCaul offering assistance for how to properly amend C-4 reports to provide the required detail when describing in-kind contributions from AARP Washington State. **(Exhibit 14)**
- 2.13 At the Initial Hearing (Case Status Review) held Nov. 8, 2024, PDC Staff informed Ms. MacCaul that the descriptions for in-kind contributions should be the same as they would be if the committee had made the expenditures and reported them on Schedule A to the C-4 report. PDC Staff asked Ms. MacCaul to provide a better description of the GMMB Production on the Sep. 1 to Oct. 14, 2024 C-4 report.
- 2.14 On Jan. 24, 2025, Mr. Haley reminded Ms. MacCaul that amendments were still needed to provide detailed in-kind contribution/expenditure descriptions, including for AARP staff time, showing the number of hours worked for each person along with a description of the work performed for the Committee. **(Exhibit 15)**
- 2.15 On Jan. 29, 2025, Ms. MacCaul responded that she was working with two colleagues to pull together the requested information. **(Exhibit 16)**
- 2.16 Ms. MacCaul was unable to fit all the requested details describing in-kind contributions into the description fields on C-4 reports. With permission from PDC Staff, Ms. MacCaul submitted detailed descriptions using the Attach a Note function for the C-4 reports. Ms. MacCaul attached all amended detailed descriptions to the 21-day pre-general election C-4 report, covering the period Sep. 1 to Oct. 14, 2024, filed Feb. 6, 2025, Report #110 270 515. The note includes all required details for the descriptions of in-kind contributions not previously reported on original or amended C-4 reports for June, July, August, September, October, and November 2024.
- 2.17 This was the first campaign in which Ms. MacCaul held the position of treasurer for a major initiative campaign.

### **III. Scope**

- 3.1 PDC Staff reviewed the following:
  - Two complaints filed by Conner Edwards
  - Responses to the two complaints submitted by Cathy MacCaul on behalf of AARP No on 2124 Sponsored by AARP Washington State
  - Original C-4 Reports submitted by AARP No on 2124 Sponsored by AARP Washington State
  - Amended C-4 Reports submitted by AARP No on 2124 Sponsored by AARP Washington State

- 3.2 During the investigation, PDC Staff exchanged numerous emails with Cathy MacCaul, Treasurer for the Committee.

Respectfully submitted this 14<sup>th</sup> day of March 2025,  
*Electronically Signed Phil Stutzman, Compliance Officer*  
Philip E. Stutzman, Compliance Officer

### **Exhibits**

- Exhibit 1** Complaint 1, filed Aug. 2, 2024
- Exhibit 2** Response to Complaint 1, Received Aug. 23, 2024
- Exhibit 3** Complaint 2, filed Jan. 29, 2025
- Exhibit 4** Response to Complaint 2, Received Feb. 6, 2025
- Exhibit 5** C-4 Report, 3/29/24 – 7/31/24, filed 8/2/24 (Report #110 235 448)
- Exhibit 6** C-4 Report, 8/1/24 – 8/31/24, filed 9/5/24 (Report#110 242 508)
- Exhibit 7** C-4 Report, 9/1/24 – 10/14/24, filed 10/7/24 (Report No. 110 249 913)
- Exhibit 8** C-4 Report, 9/1/24 – 10/14/24, filed 2/3/25 (Report #110 269 953) (Amends Report #110 249 913)
- Exhibit 9** C-4 Report, 9/1/24 – 10/14/24, filed 2/6/25 (Report #110 270 515) (Amends Report #110 269 953)
- Exhibit 10** C-4 Report, 10/15/24 – 10/28/24, filed 11/8/24 (Report #110 259 639)
- Exhibit 11** C-4 Report, 10/15/24 – 10/28/24, filed 2/17/25 (Report #110 272 548)
- Exhibit 12** C-4 Report, 10/29/24 – 11/30/24, filed 12/6/24 (C-4 Report #110 262 405)
- Exhibit 13** C-4 Report, 12/1/24 – 12/31/24, filed 12/6/24 (Report #110 269 956)
- Exhibit 14** PDC Filer Assistance Email Aug. 16, 2024
- Exhibit 15** PDC Filer Assistance Email Jan. 24, 2025
- Exhibit 16** PDC Filer Assistance Email Jan. 29, 2025

### **Applicable Statutes and Rules**

**RCW 42.17A.225, .235 and .240** require candidates, political committees, and continuing political committees to file timely, accurate reports of contributions and expenditures, including in-kind contributions/expenditures, including the name and address of each person who has made one or more contributions during the period, together with the money or in-kind value, the date



of each contribution, and the aggregate value of all contributions received from each person during the campaign, or in the case of a continuing political committee, the current calendar year, with certain exceptions. In-kind contributions must include a detailed description of the contribution, including the name and address of vendors where contributed goods or services were purchased, and if applicable, the same information for subvendors used by vendors.

Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$750 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same time period and must be disclosed on Monday for contributions deposited during the previous seven days.

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<b>Respondent Names</b>
AARP No on I 2124 Sponsored by AARP Washington State
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<p>Conner Edwards</p> <p>Fri, 2 Aug 2024 at 10:04 PM</p> <p>Description of Complaint</p> <p>The C4 filed by this committee was filed significantly late:  <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110235448">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110235448</a></p> <p>The C4 in question is a merged C4 which involves expenditures that should have been disclosed on 5/10/24 and 6/10/24 respectively.</p> <p>Additionally, members of the public are unable to tell what the in-kind donation of staff time was for. The committee just listed the names of people. What did these people do?</p> <p>Notice to Respondent</p> <p>I apologize to you for any inconvenience caused by this complaint.</p> <p>This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.</p> <p>What are these shortcomings?</p> <p>Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate filers about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.</p>

I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.

Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/>

If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.

"Be the change that you wish to see in the world."

— Mahatma Gandhi

**What impact does the alleged violation(s) have on the public?**

The PDC has an obligation to provide transparency to the voters by enforcing filing requirements. The agency's failure to actively monitor the filings of committees and enforce filing requirements damages both the public and the candidates themselves.

**List of attached evidence or contact information where evidence may be found**

PDC Website.

**List of potential witnesses with contact information to reach them**

See respondent contact info on PDC website.

**Certification (Complainant)**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



711 Capitol Way Suite 206  
PO Box 40908 Olympia, WA 98504-0908  
(360) 753-1111  
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

AARP No on I 2124 Sponsored by AARP Washington State

18000 International Blvd  
Seatac, WA 98188

Coverage: 03/29/2024 to 07/31/2024

Final report: No

Report number: 110235448

Election year: 2024

Date submitted: 08/02/2024

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$0.00
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$17,415.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$17,415.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$17,415.00
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$0.00
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$17,415.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$17,415.00
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$17,415.00

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Cathleen MacCaul - 08/02/2024

## Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

### 1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
04/30/2024	AARP Staff Time 18000 International Blvd , Seatac, WA 98188		Cathy MacCaul, Jason Erskine, Marguerite Ro, Christina Clem	Fair market value: \$1,620.00 Aggregate total (N): \$1,620.00
04/30/2024	AARP Washington Staff 18000 International Blvd , Seatac, WA 98188		Cathy MacCaul, Jason Erskine, Christina Clem, Marguerite Ro	Fair market value: \$1,625.00 Aggregate total (N): \$6,695.00
05/31/2024	AARP Washington Staff 18000 International Blvd , Seatac, WA 98188		Cathy MacCaul	Fair market value: \$390.00 Aggregate total (N): \$6,695.00
05/31/2024	AARP Washington Staff 18000 International Blvd , Seatac, WA 98188		Cathy MacCaul, Marguerite Ro, James D'Amanda, Jason Erskine, Christina Clem	Fair market value: \$1,105.00 Aggregate total (N): \$6,695.00
05/31/2024	AARP 18000 International Blvd , Seatac, WA 98188		Third Act Magazine May 2024 Edition Print and On-line	Fair market value: \$2,850.00 Aggregate total (N): \$9,100.00
07/31/2024	AARP Washington Staff 18000 International Blvd , Seatac, WA 98188		Marguerite Ro, Jason Erskine, Cathy MacCaul, Christina Clem, Bruce Carlson	Fair market value: \$3,575.00 Aggregate total (N): \$6,695.00
07/31/2024	AARP 18000 International Blvd , Seatac, WA 98188		KING 5 "New Day" July 17, TVW general long term care rotators during months	Fair market value: \$6,250.00 Aggregate total (N): \$9,100.00

### 2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

### 3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period

[Cmaccaul](#)

replied

*2 months ago (Fri, 23 Aug 2024 at 11:56 AM)*

To: "PDC Support" <pdcc@pdcc.wa.gov>

External Email

August 23, 2024

To: Washington State Public Disclosure Commission

Regarding: PDC Case Number **158257**

AARP created a Political Action Committee called "AARP No on I 2124 Sponsored by AARP Washington State" on March 29, 2024. Reports were filed each month for work starting in March 2024 showing the in-kind contributions and media purchases AARP had made. On July 30, a colleague told AARP Washington State that their activity was not showing up on the public PDC site. Research was done to try to resubmit the report but it required PDC assistance. AARP Washington called the PDC on August 2 and left a voicemail. AARP Washington was contacted by Scott Hailey, a PDC filing specialist, the same day. He saw that reports had been submitted but they were sitting in a folder on the Public Disclosure Commission (PDC) ORCA (Online Reporting Campaign Activity) tool and had not been submitted to the public facing site. Mr. Hailey resolved the issue and the reports were posted. The following confirmation email was received:

Date Filed: 2024-08-02T16:17:51.989299

Report Number: 110235448

Report Period: 2024-03-29 - 2024-07-31

Committee Name: AARP No on I 2124 Sponsored by AARP Washington State

Server Response:

AARP No on I 2124 Sponsored by AARP Washington State (election year 2024, fund id 24005): Your C4 for 03-29-2024 through 07-31-2024 was successfully transmitted on Fri Aug 2 16:17:51 PDT 2024 with confirmation #110235448

As to the complaint's allegations that the filed reports do not provide sufficient detail for the general public to determine the exact nature of expenditures, AARP would point to the history of the complainant, who has made well-known that he utilizes the complaint process to advance a public policy position to improve campaign finance transparency. AARP stands by the details in the reports filed, which satisfy the statutory requirements of Title 42 of the RCW. If the PDC wishes to delineate new requirements, AARP is happy to work to those new standards as well.

<b>Respondent Name</b>
AARP No on I 2124
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<p><u>Conner Edwards</u> reported via the portal (Wed, 29 Jan 2025 at 12:04 AM)</p> <p><b>Description of Complaint</b></p> <p>See attached complaint.</p> <p><b>Notice to Respondent</b></p> <p>I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff.</p> <p>This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state’s campaign finance laws.</p> <p>What are these shortcomings?</p> <p>Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.</p> <p>I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency’s problems become impossible to ignore.</p> <p>Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <a href="https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/">https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/</a></p> <p>If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.</p>
<b>What impact does the alleged violation(s) have on the public?</b>
See complaint. The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency’s failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.
<b>List of attached evidence or contact information where evidence may be found</b>
See complaint and also PDC website.
<b>List of potential witnesses with contact information to reach them</b>
See complaint and also PDC website.
<b>Certification (Complainant)</b>
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



# AARP No on I 2124 Sponsored by AARP Washington State 2024

[Overview](#)[Contributions](#)[Expenditures](#)[Pledges](#)[Debts](#)[Loans](#)

## Committee Overview

Registered March 29, 2024  
Statewide Ballot Measure  
Treasurer is Cathleen MacCaul

## Committee Contact

📍 18000 International Blvd  
Seatac, WA 98188  
✉ [cmaccaul@aarp.org](mailto:cmaccaul@aarp.org)  
📞 12062185915

## Financial Overview

<b>\$0.00</b> Starting balance	+	<b>\$503,799.29</b> Contributions	+	<b>\$0.00</b> Loans	=	<b>\$503,799.29</b> Total raised
<b>\$503,799.29</b> Total spent				<b>\$0.00</b> Pledges		<b>\$0.00</b> Debt

## Committee Reports and Forms

[Registration Form](#)

[Contributors and Vendors Map](#)



**Ballot Propositions Supported for 2024****Supported**

Long Term Care Services (2124) proposed for State of Washington

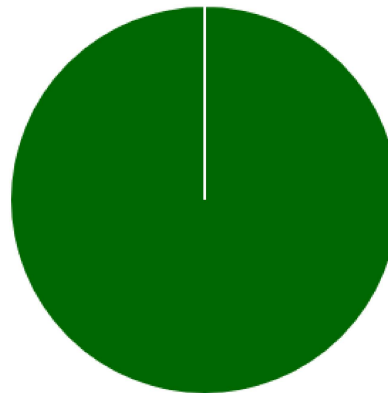
Initiative

**Made to committee for 2024****Contributions**

See who has contributed cash and in-kind (non-monetary) contributions to the committee..

**Contributions made to committee for 2024**

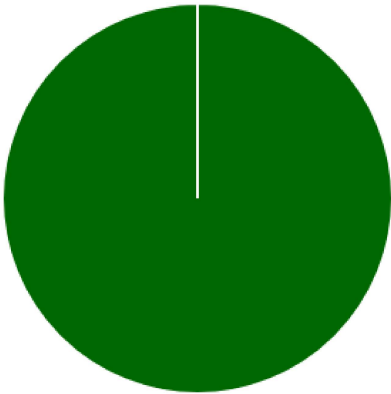
Other  
\$503,799.29

**Made by committee for 2024****Expenditures**

See how the committee has spent money, and what kind of goods and services it received as in-kind contributions.

Expenditures made by candidate for 2024

Inkind contribution  
\$503,799.29



Made to committee

Loans

See loans received, forgiven or paid by the campaign.

\$0.00

Held by committee

Debts

See the campaign's debt reporting history.

\$0.00

Campaign Finance Reports

See the reports filed by the committee. Reports with a strikethrough were amended by another report.

Show 25 entries

Download 9 rows as CSV.

Period	Report Number	Filed	Report	Form Type	Election Year
03/29/2024 - 07/31/2024	110235448	08/02/2024	<a href="#">View Report</a>	C4	2024
08/01/2024 - 08/31/2024	110242508	09/05/2024	<a href="#">View Report</a>	C4	2024
09/01/2024 - 10/14/2024	110249913	10/07/2024	<a href="#">View Report</a>	C4	2024
10/15/2024 - 10/28/2024	110259639	11/08/2024	<a href="#">View Report</a>	C4 - Amended	2024

Period	Report Number	Filed	Report	Form Type	Election Year
<del>10/15/2024 - 10/28/2024</del>	<del>110259354</del> Amended by: 110259639	11/07/2024	<a href="#">View Report</a>	C4	2024
10/29/2024 - 11/30/2024	110262405	12/06/2024	<a href="#">View Report</a>	C4 - Amended	2024
<del>10/29/2024 - 11/30/2024</del>	<del>110260399</del> Amended by: 110262405	11/15/2024	<a href="#">View Report</a>	C4 - Amended	2024
<del>10/29/2024 - 11/30/2024</del>	<del>110259355</del> Amended by: 110260399	11/07/2024	<a href="#">View Report</a>	C4	2024
12/01/2024 - 12/31/2024	110262406	12/06/2024	<a href="#">View Report</a>	C4	2024

Showing 1 to 9 of 9 entries

Previous

1

Next

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**Complaint Against: AARP No on I 2124**

**Submitted:** 1/29/25

**Notice to Respondent Due By:** 2/8/25 per WAC 390-37-050(1)

**90 Day Initial Hearing Deadline:** 4/29/25 per RCW 42.17A.755(3)

**Statutes Violated:** RCW 42.17A.235, .240, WAC 390-16-125

**Background**

**Washington State's Campaign Finance Disclosure Law**

One of the primary purposes of the public disclosure law is to provide citizens of this state, and especially voters, with the means for becoming informed about the financing of political campaigns.<sup>1</sup> The public disclosure law was enacted through voter approval of Initiative 276 in 1972.

State law requires candidates and committees that register under full reporting to submit regular reports of financial activity. Those reports are filed on schedules outlined on the PDC's key reporting dates calendar.<sup>2</sup>

**Violations**

Because this committee was opposing an initiative on the 2024 general election ballot, it was required to file an accurate 7 C4 report by 10/29/24. It failed to do so.

The committee filed an original version of the 7-day C4 report on 11/7/24, after the election was already over. See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259354>.

An accurate version of the report was not filed until 11/8/24, which was also after the election was already over. See link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110259639>.

**The amended version of the report included \$432,830.72 in expenditures/in-kind contributions that were required to have been disclosed before the general election and were not disclosed until after the general election had already ended.**

AARP has had a PDC complaint pending against it since August 16, 2024 so it should be well aware of the importance of adhering to the campaign finance requirements of Washington State.

**Conclusion**

I urge the PDC staff to take quick action and resolve the noncompliance identified in this complaint.

Best,

/s/

Conner Edwards

---

<sup>1</sup> <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics>

<sup>2</sup> <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics/key-dates-2024>

(425) 533-1677 cell

### **Notice to Respondent**

I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff.

This complaint is one of over one thousand complaints that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.

What are these shortcomings?

Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.

I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.

Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/>

If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.

**“You can’t make an omelet without breaking a few eggs.”**  
**— François de Charette**

Cathy MacCaul

replied

*7 minutes ago (Thu, 6 Feb 2025 at 4:42 PM)*

To: "PDC Support" <cdc@cdc.wa.gov>

Cc:scott.haley@cdc.wa.gov, kim.bradford@cdc.wa.gov

External Email

Dear PDC,

This is in response to PDC Cast Number 158257 and the Late reporting of the 7-day pre-general election C-4 report.

This was an oversight and I missed the filing date for the 7-day pre-general election report. I vaguely remember a reference to a need to file that report outside of the regular reporting schedule but did not receive any reminder about the importance of the upcoming deadline.

Cathy MacCaul



711 Capitol Way Suite 206  
PO Box 40908 Olympia, WA 98504-0908  
(360) 753-1111  
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

AARP No on I 2124 Sponsored by AARP Washington State

18000 International Blvd  
Seatac, WA 98188

Coverage: 03/29/2024 to 07/31/2024

Final report: No

Report number: 110235448

Election year: 2024

Date submitted: 08/02/2024

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$0.00
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$17,415.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$17,415.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$17,415.00
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$0.00
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$17,415.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$17,415.00
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$17,415.00

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Cathleen MacCaul - 08/02/2024

## Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

### 1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
04/30/2024	AARP Staff Time 18000 International Blvd , Seatac, WA 98188		Cathy MacCaul, Jason Erskine, Marguerite Ro, Christina Clem	Fair market value: \$1,620.00 Aggregate total (Full election cycle): \$1,620.00
04/30/2024	AARP Washington Staff 18000 International Blvd , Seatac, WA 98188		Cathy MacCaul, Jason Erskine, Christina Clem, Marguerite Ro	Fair market value: \$1,625.00 Aggregate total (Full election cycle): \$6,695.00
05/31/2024	AARP Washington Staff 18000 International Blvd , Seatac, WA 98188		Cathy MacCaul	Fair market value: \$390.00 Aggregate total (Full election cycle): \$6,695.00
05/31/2024	AARP Washington Staff 18000 International Blvd , Seatac, WA 98188		Cathy MacCaul, Marguerite Ro, James D'Amanda, Jason Erskine, Christina Clem	Fair market value: \$1,105.00 Aggregate total (Full election cycle): \$6,695.00
05/31/2024	AARP 18000 International Blvd , Seatac, WA 98188		Third Act Magazine May 2024 Edition Print and On- line	Fair market value: \$2,850.00 Aggregate total (Full election cycle): \$9,100.00
07/31/2024	AARP Washington Staff 18000 International Blvd , Seatac, WA 98188		Marguerite Ro, Jason Erskine, Cathy MacCaul, Christina Clem, Bruce Carlson	Fair market value: \$3,575.00 Aggregate total (Full election cycle): \$6,695.00
07/31/2024	AARP 18000 International Blvd , Seatac, WA 98188		KING 5 "New Day" July 17, TVW general long term care rotators during months	Fair market value: \$6,250.00 Aggregate total (Full election cycle): \$9,100.00

### 2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

### 3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period





711 Capitol Way Suite 206  
PO Box 40908 Olympia, WA 98504-0908  
(360) 753-1111  
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

AARP No on I 2124 Sponsored by AARP Washington State

18000 International Blvd  
Seatac, WA 98188

Coverage: 08/01/2024 to 08/31/2024

Final report: No

Report number: 110242508

Election year: 2024

Date submitted: 09/05/2024

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$17,415.00
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$13,660.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$13,660.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$31,075.00
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$17,415.00
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$13,660.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$13,660.00
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$31,075.00

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Cathleen MacCaul - 09/05/2024

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
08/31/2024	AARP Washington Staff 18000 International Blvd , Seatac, WA 98188		AARP staff time on No on I 2124 - Marguerite Ro, Cathy MacCaul, Jason Erskine, Christina Clem, James D'Amanda, Bruce Carlson	Fair market value: \$7,410.00 Aggregate total (Full election cycle): \$14,105.00
08/31/2024	AARP 18000 International Blvd , Seatac, WA 98188		New Day and TVW	Fair market value: \$6,250.00 Aggregate total (Full election cycle): \$15,350.00

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period



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PO Box 40908 Olympia, WA 98504-0908  
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Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

AARP No on I 2124 Sponsored by AARP Washington State

18000 International Blvd  
Seatac, WA 98188

Coverage: 09/01/2024 to 10/14/2024

Final report: No

Report number: 110249913

Election year: 2024

Date submitted: 10/07/2024

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$31,075.00
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$30,718.57	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$30,718.57
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$61,793.57
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$31,075.00
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$30,718.57	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$30,718.57
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$61,793.57

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Cathleen MacCaul - 10/07/2024

## Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

### 1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
09/30/2024	AARP Staff Time 18000 International Blvd , Seatac, WA 98188		Rob Grubbs, Peter Hutchins, DJ Mash, Josh Steiner, Torin Fossi, Priscilla Hume, Rachel Auerbach, James D'Amanda, Christina Clem, Amanda Frame, Marguerite Ro, Cathy MacCaul, Jason Erskine, Ithzamar Valencia	Fair market value: \$11,115.00 Aggregate total (Full election cycle): \$12,735.00
09/30/2024	AARP 18000 International Blvd , Seatac, WA 98188		GMMB Production	Fair market value: \$2,827.57 Aggregate total (Full election cycle): \$34,953.57
09/30/2024	AARP 18000 International Blvd , Seatac, WA 98188		3rd Act Magazine	Fair market value: \$2,850.00 Aggregate total (Full election cycle): \$34,953.57
09/30/2024	AARP 18000 International Blvd , Seatac, WA 98188		New Day (KING 5), TVW, KXLY-TV	Fair market value: \$13,926.00 Aggregate total (Full election cycle): \$34,953.57

### 2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

### 3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period



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**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

AARP No on I 2124 Sponsored by AARP Washington  
State

Coverage: 09/01/2024 to 10/14/2024  
Report number: 110269953 Amended by 110270515Amends  
110249913

18000 International Blvd  
Seatac, WA 98188

Election year: 2024  
Date submitted: 02/03/2025

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$31,080.00
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$33,468.57	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$33,468.57
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$64,548.57
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$31,080.00
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$33,468.57	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$33,468.57
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$64,548.57

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Cathleen MacCaul - 02/03/2025

## Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

### 1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
09/30/2024	AARP Staff Time 18000 International Blvd , Seatac, WA 98188		Torin Fossi, Priscilla Hume, Rachel Auerbach, James D'Amanda, Christina Clem, Amanda Frame, Marguerite Ro, Cathy MacCaul, Jason Erskine, Ithzamar Valencia (See detail in memo below)	Fair market value: \$11,115.00 Aggregate total (Full election cycle): \$12,740.00
09/30/2024	AARP 18000 International Blvd , Seatac, WA 98188		GMMB Production - Graphic design, creative on digital spot and video 1200 Westlake Avenue, N, Suite 1005, Seattle, WA 98109	Fair market value: \$2,827.57 Aggregate total (Full election cycle): \$37,703.57
09/30/2024	AARP 18000 International Blvd , Seatac, WA 98188		3rd Act Magazine (see detail in memo below)	Fair market value: \$2,850.00 Aggregate total (Full election cycle): \$37,703.57
09/30/2024	AARP 18000 International Blvd , Seatac, WA 98188		New Day (KING 5), TVW, KXLY-TV (See detail in memo below)	Fair market value: \$13,926.00 Aggregate total (Full election cycle): \$37,703.57
10/07/2024	AARP 18000 International Blvd , Seatac, WA 98188		TVW - Cable ads, digital ads on website. Rotated by station. (See detail in memo below)	Fair market value: \$2,750.00 Aggregate total (Full election cycle): \$37,703.57

### 2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

### 3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period



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**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

AARP No on I 2124 Sponsored by AARP Washington State

Coverage: 09/01/2024 to 10/14/2024

Report number: 110270515 Amends 110269953

18000 International Blvd  
Seatac, WA 98188

Election year: 2024

Date submitted: 02/06/2025

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$31,080.00
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$423,468.57	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$423,468.57
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$454,548.57
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$31,080.00
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$423,468.57	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$423,468.57
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$454,548.57

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Cathleen MacCaul - 02/06/2025

## Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

### 1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
09/30/2024	AARP Staff Time 18000 International Blvd , Seatac, WA 98188		Torin Fossi, Priscilla Hume, Rachel Auerbach, James D'Amanda, Christina Clem, Amanda Frame, Marguerite Ro, Cathy MacCaul, Jason Erskine, Ithzamar Valencia (See detail in memo below)	Fair market value: \$11,115.00 Aggregate total (Full election cycle): \$12,740.00
09/30/2024	AARP 18000 International Blvd , Seatac, WA 98188		GMMB Production - Graphic design, creative on digital spot and video 1200 Westlake Avenue, N, Suite 1005, Seattle, WA 98109	Fair market value: \$2,827.57 Aggregate total (Full election cycle): \$427,703.57
09/30/2024	AARP 18000 International Blvd , Seatac, WA 98188		3rd Act Magazine (see detail in memo below)	Fair market value: \$2,850.00 Aggregate total (Full election cycle): \$427,703.57
09/30/2024	AARP 18000 International Blvd , Seatac, WA 98188		New Day (KING 5), TVW, KXLY-TV (See detail in memo below)	Fair market value: \$13,926.00 Aggregate total (Full election cycle): \$427,703.57
10/01/2024	AARP 18000 International Blvd , Seatac, WA 98188		Radio ads KRWM, KSWD, KPNW, KKWF, KJEB, KICR, KXLY, KEYF 10/1 to 11/5 (Note Added)	Fair market value: \$125,000.00 Aggregate total (Full election cycle): \$427,703.57
10/04/2024	AARP 18000 International Blvd , Seatac, WA 98188		GMMB Digital Display, Video, Radio Spot 10/4 to 11/5 (Note added)	Fair market value: \$265,000.00 Aggregate total (Full election cycle): \$427,703.57
10/07/2024	AARP 18000 International Blvd , Seatac, WA 98188		TVW - Cable ads, digital ads on website. Rotated by station. (See detail in memo below)	Fair market value: \$2,750.00 Aggregate total (Full election



Date Received	Contributor	Employer/Occupation	Description	Amount
				cycle):
				\$427,703.57
2. PLEDGES RECEIVED BUT NOT YET PAID:				
				No pledges reported this period
3. ORDERS PLACED, DEBTS AND OBLIGATIONS:				
				No debt reported this period

## Report notes/attachments

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AARP Additional Documentation for No on I-2124 Campaign

### JUNE

3rd Act Magazine: Article appeared on 6/01/24 as part of an AARP-sponsored caregiving series written by 3rd Act. \$2850 payment from AARP to: Oshi Publishing LLC, P.O. Box 412, Brinnon, WA 98320

### JULY

New Day Northwest (KING-5): AARP-sponsored segment (not a TV ad) appearing on July 23. Buy also included digital ads on KING-5.com and KING-5s FB page linking to sponsored segment. \$3500 payment from AARP to: KING 5 Media Group, 1501 1st Ave S., Ste 300, Seattle, WA 98134.

TVW: Television and digital ads appeared throughout the month. TVW produced the television ad as part of the paid sponsorship. AARP produced the digital ads. \$2750 payment from AARP to: TVW, 1058 Capitol Way S., Olympia, WA 98501

### AUGUST

New Day Northwest (KING-5): AARP-sponsored segment (not a TV ad) appearing on August 27. Buy also included digital ads on KING-5.com and KING-5s FB page linking to sponsored segment. \$3500 payment from AARP to: KING 5 Media Group, 1501 1st Ave S., Ste 300, Seattle, WA 98134.

TVW: Television and digital ads appeared throughout the month. TVW produced the television ad as part of the paid sponsorship. AARP produced the digital ads. \$2750 payment from AARP to: TVW, 1058 Capitol Way S., Olympia, WA 98501

### SEPTEMBER

New Day Northwest (KING-5): AARP-sponsored segment (not a TV ad) appearing on Sept. 18. Buy also included digital ads on KING-5.com and KING-5s FB page linking to sponsored segment. \$3500 payment from AARP to: KING 5 Media Group, 1501 1st Ave S., Ste 300, Seattle, WA 98134.

TVW: Television and digital ads appeared throughout the month. TVW produced the television ad as part of the paid sponsorship. AARP produced the digital ads. \$2750 payment from AARP to: TVW, 1058 Capitol Way S., Olympia, WA 98501

3rd Act Magazine: Article appeared on 9/01/24 as part of an AARP-sponsored caregiving series written by 3rd Act. \$2850 payment from AARP to: Oshi Publishing LLC, P.O. Box 412, Brinnon, WA 98320

KXLY-TV: KXLY-TV produced and aired a 30-second TV segment for us on caregiving, and also placed it on their FB page. \$7676 payment from AARP to: Spokane Television, Inc., 500 W. Boone Ave., Spokane, WA 99201

### OCTOBER

New Day Northwest (KING-5): AARP-sponsored segment (not a TV ad) appearing on Oct. 17. Buy also included digital ads on KING-5.com and KING-5s FB page linking to sponsored segment. \$3500 payment from AARP to: KING 5 Media Group, 1501 1st Ave S., Ste 300, Seattle, WA 98134.

TVW: Television and digital ads appeared throughout the month. TVW produced the television ad as part of the paid sponsorship. AARP produced the digital ads. \$2750 payment from AARP to: TVW, 1058 Capitol Way S., Olympia, WA 98501

KXLY-TV: KXLY-TV produced and aired a 30-second TV segment for us on caregiving, and also placed it on their FB page. \$7676 payment from AARP to: Spokane Television, Inc., 500 W. Boone Ave., Spokane, WA 99201

BrotherDoug: BrotherDoug recorded and produced several social media videos and one video podcast. \$8500 payment from AARP to: BROTHERDOUG MEDIA LLC, 9508 Densmore Ave. N., Seattle, WA 98103

Senior Paper ads: AARP produced newspaper ads and placed them in the following eight publications in October, 2024.

Homage: Newspaper ad appeared in October issue. \$2028 payment from AARP to: Sound Publishing

Inc, PO Box 930, Everett, WA 98206

Senior Scene: Newspaper ad appeared in October issue. \$1897.72 payment from AARP to: Senior Media Services, 3848 S. Junett St., Tacoma, WA 98409

Seniors Sunset Times: Newspaper ads appeared on 9/30/24 and 10/14/24. \$1050 payment from AARP to: Seniors Sunset Times, PO Box 74, Clallam Bay, WA 98326

Thurston Mason Senior News: Newspaper ad appeared in October issue. \$1395 payment from AARP to: Senior News, PO Box 7624, Olympia, WA 98507

The Messenger: Newspaper ad appeared in October issue. \$1484 payment from AARP to: Sequence Graphics LLC/The Messenger, 400 E. Evergreen Blvd., Ste. 111, Vancouver, WA 98660

Senior Times and the Tri-Cities Area Journal of Business: Newspaper ads appeared in October issues: \$2940 payment from AARP to: Tri-Cities Area of Business and Senior Times, 8656 W. Gage Blvd., Suite C303, Kennewick, WA 99336

3rd Act Magazine: Newspaper ad appeared in October issue. \$2936 payment from AARP to: Armagon Media LLC, 2522 N. Proctor St. #495, Tacoma, WA 98406

#### NOVEMBER

New Day Northwest (KING-5): AARP-sponsored segment (not a TV ad) appearing on Nov. 4. Buy also included digital ads on KING-5.com and KING-5s FB page linking to sponsored segment. \$3500 payment from AARP to: KING 5 Media Group, 1501 1st Ave S., Ste 300, Seattle, WA 98134.

TVW: Television and digital ads appeared throughout the month. TVW produced the television ad as part of the paid sponsorship. AARP produced the digital ads. \$2750 payment from AARP to: TVW, 1058 Capitol Way S., Olympia, WA 98501

#### GMMB

1200 Westlake Avenue, N, Suite 1005  
Seattle, WA 98109

GMMB produced:

- 1.Digital display advertising
- 2.Radio spot
- 3.Video Commercial

AARP paid GMMB to purchase advertising on AARPs behalf to run October 4, 2024 through November 5, 2024::

Locality - digital display advertising, video commercial

o5 Times Square, New York, NY 10036

The Washington Post digital display advertising, video commercial

o1301 K St NW, Washington, DC 20071

CNN digital display advertising, video commercial

o190 Marietta St NW, Atlanta, GA 30303

Optimum Media - video commercial

o1 Court Square, Long Island City, NY 11101

Sinclair video commercial

o10706 Beaver Dam Road, Hunt Valley, Maryland 21030

Bidtellect aka Simpli.fi digital display advertising

o128 East Exchange Avenue, Suite 700, Fort Worth, TX 76164

StackAdapt - digital display advertising, video commercial

o200 Bay Street, South Tower, Unit # 2103, Toronto, ON M5J 2J1, Canada

Total: \$265,000

AARP paid GMMB to purchase radio spots on AARPs behalf to run October 1, 2024 through November 5, 2024:

KRWM-FM - 3650 131st Ave SE Ste 550, Bellevue, WA 98006

KPNW-FM - 3650 131st Ave SE, Suite #550, Bellevue, WA, 98006

KSWD-FM - 800 5th Avenue, Suite 1400, Seattle, WA 98104-3176

KKWF-FM - 800 5th Avenue, Suite 1400, Seattle, WA, United States, Washington

KJEB-FM - 645 Elliott Avenue West, Suite 400, Seattle, WA 98119

KICR-FM - 610 W Hubbard, Suite 207, Coeur d'Alene, ID 83814

KXLY-FM - 500 W Boone Ave, Spokane WA 99201-2404

KEYF-FM - 1601 E 57th Ave, Spokane WA 99223-6623

Total: \$125,000



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**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

AARP No on I 2124 Sponsored by AARP Washington  
State

Coverage: 10/15/2024 to 10/28/2024

Report number: 110259639 Amended by 110269954Amends  
110259354

18000 International Blvd  
Seatac, WA 98188

Election year: 2024

Date submitted: 11/08/2024

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$64,543.57
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$432,830.72	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$432,830.72
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$497,374.29
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$64,543.57
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$432,830.72	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$432,830.72
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$497,374.29

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Cathleen MacCaul - 11/08/2024

## Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

### 1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
10/17/2024	AARP 18000 International Blvd , Seatac, WA 98188		New Day Northwest Interview on voter engagement with website to AARP website	Fair market value: \$3,500.00 Aggregate total (Full election cycle): \$460,719.29
10/28/2024	AARP Staff Time 18000 International Blvd , Seatac, WA 98188		Priscilla Hume -Messaging (7.5 hours), Rachel Aurbach - Messaging (1 hour), James D'Amanda - Community Outreach (5 Hours), June Lyle - Strategy and messaging (14.5 hours), Christina Clem - Messaging, media relations, writing (23 hours),	Fair market value: \$9,815.00 Aggregate total (Full election cycle): \$22,550.00
10/28/2024	AARP 18000 International Blvd , Seatac, WA 98188		KXLY	Fair market value: \$7,676.00 Aggregate total (Full election cycle): \$460,719.29
10/28/2024	AARP 18000 International Blvd , Seatac, WA 98188		Brother Doug Media Production	Fair market value: \$8,500.00 Aggregate total (Full election cycle): \$460,719.29
10/28/2024	AARP 18000 International Blvd , Seatac, WA 98188		Senior Publication Statewide	Fair market value: \$13,339.72 Aggregate total (Full election cycle): \$460,719.29
10/28/2024	AARP 18000 International Blvd , Seatac, WA 98188		Radio ads KRWM, KSWD, KPNW, KKWF, KJEB, KICR, KXLY, KEYF 10/1 to 11/5	Fair market value: \$125,000.00 Aggregate total (Full election cycle): \$460,719.29
10/28/2024	AARP		Washington Post, CNN, Optimum, Sinclair, Bidtellect, StackAdapt 10/4	Fair market value:

Date Received	Contributor	Employer/Occupation	Description	Amount
	18000 International Blvd , Seatac, WA 98188		to 11/5	\$265,000.00
				Aggregate total (Full election cycle): \$460,719.29

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period



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**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

AARP No on I 2124 Sponsored by AARP Washington State

Coverage: 10/15/2024 to 10/28/2024

Report number: 110272548 Amends 110269954

18000 International Blvd  
Seatac, WA 98188

Election year: 2024

Date submitted: 02/17/2025

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$454,548.57
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$43,221.72	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$43,221.72
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$497,770.29
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$454,548.57
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$43,221.72	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$43,221.72
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$497,770.29

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Cathleen MacCaul - 02/17/2025

## Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

### 1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
10/17/2024	AARP 18000 International Blvd , Seatac, WA 98188		New Day Northwest Interview on voter engagement with website to AARP website (see detail in memo below)	Fair market value: \$3,500.00 Aggregate total (Full election cycle): \$461,110.29
10/17/2024	AARP 18000 International Blvd , Seatac, WA 98188		Senior publication and advertising statewide (See detail in memo below)	Fair market value: \$13,730.72 Aggregate total (Full election cycle): \$461,110.29
10/28/2024	AARP Staff Time 18000 International Blvd , Seatac, WA 98188		Priscilla Hume -Messaging (7.5 hours), Rachel Aurbach - Messaging (1 hour), James D'Amanda - Community Outreach (5 Hours), June Lyle - Strategy and messaging (14.5 hours), Christina Clem - Messaging, media relations, writing (23 hours),	Fair market value: \$9,815.00 Aggregate total (Full election cycle): \$22,555.00
10/28/2024	AARP 18000 International Blvd , Seatac, WA 98188		KXLY (See detail in memo below)	Fair market value: \$7,676.00 Aggregate total (Full election cycle): \$461,110.29
10/28/2024	AARP 18000 International Blvd , Seatac, WA 98188		Brother Doug Media Production (See Detail in memo below)	Fair market value: \$8,500.00 Aggregate total (Full election cycle): \$461,110.29

### 2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

### 3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period





711 Capitol Way Suite 206  
PO Box 40908 Olympia, WA 98504-0908  
(360) 753-1111  
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

AARP No on I 2124 Sponsored by AARP Washington  
State

18000 International Blvd  
Seatac, WA 98188

Coverage: 10/29/2024 to 11/30/2024

Report number: 110262405 Amended by 110269955Amends  
110260399

Election year: 2024

Date submitted: 12/06/2024

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$497,374.29
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$9,175.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$9,175.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$506,549.29
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$497,374.29
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$9,175.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$9,175.00
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$506,549.29

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Cathleen MacCaul - 12/06/2024

## Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

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### 1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
11/05/2024	AARP 18000 International Blvd , Seatac, WA 98188		Staff time - Cathy MacCaul 12 (strategy/media) Bruce Carlson 12 (social media) Marguerite Ro 6 (strategy) Christina Clem 3 (media) Jason Erskine 4 (media) Brian Posey 2 (Policy) Lori Parham 3 (Policy)	Fair market value: \$2,925.00 Aggregate total (Full election cycle): \$469,894.29
11/05/2024	AARP 18000 International Blvd , Seatac, WA 98188		New Day Northwest \$3500 TVW Rotators \$2750 Linked to AARP No on I 2124 website	Fair market value: \$6,250.00 Aggregate total (Full election cycle): \$469,894.29

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### 2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

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### 3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period

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**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

AARP No on I 2124 Sponsored by AARP Washington State

Coverage: 12/01/2024 to 12/31/2024

Report number: 110269956 Amends 110262406

18000 International Blvd  
Seatac, WA 98188

Election year: 2024

Date submitted: 02/03/2025

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$506,945.29
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$0.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$506,945.29
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$506,945.29
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$0.00
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$506,945.29

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Cathleen MacCaul - 02/03/2025

Scott Haley

emailed cmaccaul@aarp.org

Fri, 16 Aug 2024 at 2:08 PM

From: pdc@pdc.wa.gov

Cathy McCaul,

I'm a filer assistant with the Public Disclosure Commission. I'm available to assist you to amend your report in response to the complaint against AARP No on I 2124 Sponsored by AARP Washington State. Please add additional detail to the reports of in-kind contributions of staff time for the committee. To do this, open the ORCA campaign and use the contribution search function to find the in-kind contributions of staff time. Some of these entries show the names of the staff members in the description field, with no other detail. Please add to these entries descriptions of what these people did for the committee while they worked for it. After you add these details, submit the C4 report again to amend it. If you need assistance, please reply to this message or call me at (360) 586-8637.

Thank you,

--Scott Haley

Filer Assistance Specialist

Washington Public Disclosure Commission

Scott Haley

replied

Fri, 24 Jan 2025 at 3:49 PM

To:cmaccaul@aarp.org

Cathy MacCaul,

I'm working with Phil Stutzman, the compliance officer who's working with you on the complaint that was filed against AARP No on I-2124. I recommend that you use the Contribution Search function in ORCA to get the list of in-kind contributions received by the committee, open entries, and edit them to add more details.

The C4 report for 3/29/2024 through 7/31/2024 shows in-kind contributions of staff time from the AARP. The in-kind contributions of staff time on later C4 reports show the number of hours worked by each person and indicates what they did for the committee, like strategy/media. I recommend that you add this information to the earlier entries describing contributions of staff time.

For purchases of magazine ads, like the 5/31/2024 contribution, I recommend that you add to the description that it was a magazine advertisement, the name and address of the company that AARP paid for the ad, and the date that the ad was first published.

The AARP contributed TV ads on King 5's New Day and on TVW. Did the AARP pay one company for these two TV Ads? If so, please include the name and address of the company paid. If the AARP paid a company for TV ads on these two channels, and then the company paid King 5 and TVW, I recommend that you include the names and business addresses of the two companies that were paid.

For the in-kind contributions that the AARP purchased from GMMB Production, please include a description of what GMMB Production provided--did they create a TV commercial? Please include a business address for GMMB Production. The same thing should be done to description of the in-kind contribution purchased from Brother Doug Media Production.

Please add to the description of the contribution purchased from Senior Publication Statewide. If this was a contribution of advertisements in a publication, please add to the description the date the ad was first broadcast or published, the names of the publication(s) the ad was in, and the name and address of the business that AARP paid for this.

Please update the description of the purchase of radio ads to include the name and business address of the business that the AARP paid for the radio ads. If this was an arrangement in which the AARP paid a business for the radio ads, and then the business purchased the ads from radio stations, please include the business names and addresses of the entities that were paid.

Please edit the in-kind contribution with the description "Washington Post, CNN, Optimum, Sinclair, Bidtellect, StackAdapt 10/4 to 11/5. This was a \$265,000 expenditure by the AARP. Since this seems to be advertising, please include the type of advertising this was. If the \$265,000 was paid to one business, please add the name and address of this business. If that business paid other businesses for the advertising, please include the names and addresses of those businesses.

After you add to the descriptions of these in-kind contributions, please submit the C4 reports that include these contributions again to amend them. If you need assistance, please reply to this message or call the PDC at (360) 753-1111 and ask for Scott.

Thank you,

--Scott Haley  
Filer Assistance Specialist

Cathy MacCaul

replied

Wed, 29 Jan 2025 at 3:09 PM

To:"PDC Support" <cdc@cdc.wa.gov>

External Email

Hi Scott,

Two of my colleagues are assisting me in pulling this information together. I am hoping to have it done by Friday.

I hope that works.

Cathy