



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

NOTE: [On Jan. 1, 2026, RCW 42.17A was recodified to RCW 29B](#)

January 15, 2026

Delivered electronically to matthew@wsrp.org; joel@ard.law & cg.edwards53@gmail.com

Subject: PDC Case 159267 regarding Washington State Republican Party (WSRP)

Messrs. Frolich, Ard and Edwards:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by George Robison on July 13, 2024, alleging a violation of RCW 42.17A.270 for failure to report an earmarked contribution.

PDC also completed its investigation into allegations added by staff on November 19, 2024, and February 13, 2025. Staff alleged the Respondent violated: (1) RCW 42.17A.235 and RCW 42.17A.240 for failure to timely and accurately file a C-3 report; (2) RCW 42.17A.220 and WAC 390-18-030 for failure to deposit funds received within five business days and; (3) RCW 42.17A.320 for failure to include complete sponsor identification on political advertisement.

Applicable Laws and Rules

[RCW 42.17A.220](#) requires, in relevant part, that all monetary contributions received by a political committee be deposited within five business days of receipt of the contribution.

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

[RCW 42.17A.270](#) describes the required method for reporting receipt of an earmarked contribution benefitting a candidate.

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

[WAC 390-18-030\(3\)](#) provides sponsors of small online advertising an alternative to including the required sponsor identification disclosures on the ad itself when doing so would be impractical. The sponsor may use an automatic display with the ad that takes the reader directly to the required disclosures. Examples of automatic displays include, but are not limited to, pop-ups that cannot be blocked, roll-overs, and separate text boxes or one-click links that automatically appear or take the reader directly to the required disclosures.

Background and Findings

- WSRP is a bona fide state party committee registered with the PDC during calendar year 2024 under the “Full Reporting” option.
- On July 13, 2024, PDC staff received a complaint filed by George Robison alleging that WSRP had violated RCW 42.17A.270 by failing to properly report an earmarked contribution, specifically WSRP’s receipt of a \$20,000 contribution from Gary Parker originally reported as received on April 24, 2024, followed by a \$20,000 contribution made to the 2024 Jesse Young Campaign the same day. Mr. Parker had previously donated the maximum amount allowed to the Young Campaign.

Allegations 1 & 2 – Late & Inaccurate C-3 and Late Deposit

- During an October 15, 2024, interview as part of staff’s investigation of PDC Case No. 146593, staff asked about the \$20,000 contribution from Mr. Parker. WSRP Executive Director, Matthew Frohlich, stated that the contribution was actually received on April 4, 2024, but not deposited until April 24, 2024.
- On February 10, 2025, per staff’s request, WSRP amended the C-3 report (110271150) disclosing the \$20,000 contribution from Gary Parker to reflect the accurate receipt date of April 4, 2024.
- On February 13, 2025, PDC staff notified WSRP about the addition of alleged violations of: (1) RCW 42.17A.235 and RCW 42.17A.240 for failure to timely and accurately file the C-3 report with deposit date April 24, 2024; and (2) RCW 42.17A.220 and WAC 390-18-030 for failure to deposit funds received within five business days.
- On February 25, 2025, counsel for WSRP, Conner Edwards provided a response to the allegations of late and inaccurate reporting of a C-3, and failure to deposit funds within five business days, confirming that WSRP supports campaign finance disclosure and will institute new internal processes to ensure these violations do not reoccur.

Allegation 3 – Incomplete Sponsor ID

- On November 4, 2024, PDC staff received a complaint filed by Dmitri Iglitzin on behalf of Washington State Democratic Central Committee alleging a violation of RCW 42.17A.335 for sponsoring political advertising containing a false statement of material fact about a candidate for public office. This complaint was investigated under PDC Case No. 162582.
- Maria Beltran, Ana Ruiz Kennedy and Chelsea Dimas were candidates for State Senate or State House of Representatives in Legislative District 14, in the November 5, 2024, general election.

- In October 2024, WSRP sponsored text messages opposing the 2024 candidacies of Maria Beltran, Ana Ruiz Kennedy and Chelsea Dimas.
- During the investigation of PDC Case No. 162582 regarding the text message content, staff noted that the message did not include the address of the sponsor, WSRP, nor one of the sponsor ID alternatives described in WAC 390-18-030(3).
- On November 19, 2024, PDC staff notified WSRP about the addition of an alleged violation of RCW 42.17A.320 for failure to include the required sponsor identification on a text message sent during the 2024 election opposing candidates Beltran, Ruiz Kennedy and Dimas.
- Counsel for WSRP, Joel Ard, provided a response dated December 4, 2024, to the allegation of incomplete sponsor ID, stating that the text message “plainly and unequivocally” identified the sponsor as WSRP in the first words of the message.

Summary and Resolution

It appears that the complaint filed by George Robison on July 13, 2024, alleging a violation of RCW 42.17A.270 for failure to report an earmarked contribution was likely submitted due to the appearance of a \$20,000 contribution received and spent the same day and may not have caused concern if the correct date of receipt had been disclosed timely. Given the new facts regarding this contribution, staff did not find any evidence of improper or undisclosed earmarking.

You completed a Statement of Understanding (SOU) in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of : (1) RCW 42.17A.235 and RCW 42.17A.240; (2) RCW 42.17A.220 and WAC 390-18-030 and; (3) RCW 42.17A.320 to resolve this matter with the Public Disclosure Commission.

Based on this information, the PDC has dismissed this matter in accordance with RCW 29B.60.020(1).

If you have questions, you may contact Jennifer Hansen at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Jennifer Hansen
Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

cc: George Robison