



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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August 4, 2025

Delivered electronically to alanrubioprd@gmail.com, dawgperry@gmail.com,
elpolaco_027@hotmail.com and cg.edwards53@gmail.com

Subject: PDC Case 172566 regarding Alan Rubio

Dear Alan Rubio:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on May 16, 2025. The complaint alleged that Alan Rubio (the “Respondent”) violated RCW 42.17A.235, .250, and .320 by failing to timely and accurately report contributions and expenditures and include sponsor address on a candidate website.

Applicable Laws and Rules

Candidates that select the Full Reporting option on their *Candidate Registration* (C-1 report) are required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the candidate’s election participation¹, and their financial activity².

¹ [RCW 42.17A.005\(38\)](#) defines “participate” to mean that, with respect to a particular election, an entity engages in one or more of the following activities: 1) makes a monetary or in-kind contribution to a candidate; 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate; or 3) engages in an activity described in .005(38)(c), (d) or (e).

² Per [RCW 42.17A.235\(3\)\(a\)](#), each treasurer of a candidate or political committee is required to file a report on the tenth day of each month during which they are not participating in an election campaign only if the committee 1) received a contribution or made an expenditure in the preceding calendar month; and 2) either total contributions received or total expenditures made since the last such report exceed \$750. A candidate may delay filing monthly C-4 reports during periods when they are not participating in election until they have either received contributions or made expenditures that exceed \$750.

Pursuant to [RCW 42.17A.240\(7\)](#), expenditures are disclosed on C-4 reports, which must include, but are not limited to: 1) the name and address of each person to whom an expenditure was made in the aggregate of more than \$200³ during the period covered by the report; 2) the amount, date, and purpose of each expenditure; and 3) the total sum of all expenditures. Expenditure details should include, but are not limited to, the name and address of the vendor or recipient, the goods or services provided, including the number of items purchased. For advertising expenditures, campaigns should describe the type and number of ads, where they appeared or were broadcast, and when (e.g. run dates). An in-kind contribution is disclosed as an expenditure for purposes of campaign accounting and reporting.

[RCW 42.17A.235\(10\)](#) requires the submission of amended C-3 and C-4 reports within 21 days of filing the original report.

[RCW 42.17A.320](#) requires all written political advertising⁴ to include the name and address of the sponsor (person who paid for the ad). Sponsor identification should appear on the first page or fold of the political advertising, be set apart from other printed matter, and the font size used must be at least the larger of the following: 1) ten-point type; or 2) ten percent of the largest type used in the advertisement.

[WAC 390-18-010](#) indicates that all advertising must clearly state that it has been paid for by the sponsor. Additional disclosures may be required, depending on the sponsor and type of advertising used.

Background and Findings

- The Respondent is a candidate for the position of City Council Member with the City of Everett who is participating in the August 5, 2025, Primary Election. He first filed a *Candidate Registration* (C-1 report) with the PDC on December 30, 2024, and selected the Full Reporting option.
- The Respondent first responded to the complaint by email on May 22, 2025, acknowledged mistakes were made, and said he would fix them right away.
- The Respondent was cooperative throughout our assessment of the complaint and took corrective action as needed.
- The Respondent does not have previous warnings/violations of PDC requirements.

³ Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

⁴ “Political advertising” is a mass communication used to appeal, directly or indirectly, for votes, financial or other support, or opposition to any election campaign that is intended to reach a large audience via a variety of methods. These methods include, but are not limited to, newspaper, radio and TV advertising, signs, billboards, brochures, fliers, and digital communications and online transmissions such as internet websites, social media, emails, and texts. [RCW 42.17A.005\(40\)](#) and [WAC 390-05-290\(3\)](#).

Allegation: Late Reporting (2025)

- On March 10, 2025, the Respondent filed a C-4 report covering 1/20/25-2/28/25 activity. The candidate committee met the \$750 threshold for monthly reporting on January 11, 2025, so the information disclosed on the report for January was 28 days late. February activity was timely disclosed on the C-4 report.
- The Respondent's March C-4 report and April C-4 report were both filed on May 15, 2025, which is 35 and 3 days late respectively.
- The original May C-4 report was filed early, before the end of the reporting period, and later amended to disclose activity for the entire month of May.
- On July 15, 2025, the Respondent timely submitted a 21-day pre-General C-4 report (covering 6/1-7/14).
- The Respondent's 7-day pre-General C-4 report (covering 7/15-7/28) was submitted timely.
- The Respondent filed 42 C-3 reports for deposits made 1/10/25-6/23/25⁵.
 - Fifteen of the C-3 reports were filed 29-94 days late, including the three C-3 reports alleged in the complaint disclosing the candidate's contributions to his own campaign.
 - Twenty-seven C-3 reports were timely filed.

Allegation: Insufficient Expenditure Details

- On July 15, 2025, and July 29, 2025, the Respondent amended his C-4 report covering January/February, to include vendor address for seven expenditures, and advertising details for two online newspaper ads.
- On July 15, 2025, the Respondent amended his April C-4 report to include the number of door hangers and vendor address for an expenditure.
- The Respondent amended his May C-4 report, which had been filed early and before the end of the reporting period, four times to resolve the following issues:
 - On June 10, 2025, to include the number of signs purchased and vendor address for an expenditure, and to disclose expenditures made during the last half of May;
 - On July 15, 2025, to include a vendor address;
 - On July 22, 2025, to change three expenditures to in-kind contributions; and

⁵ On July 29, 2025, the Respondent's Treasurer confirmed that there were no deposits to disclose on C-3 reports since June 23, 2025.

- On July 29, 2025, to include vendor address for the three in-kind contributions.

Allegation: Insufficient Sponsor ID on Website

- Prior to the complaint being filed on May 15, 2025, the Respondent’s candidate website at www.alanrubio.org contained partial sponsor identification (ID), including the name and address of the sponsor (campaign), but lacked the “Paid for by” phrase.
- On May 23, 2025, and within twenty-four hours of being notified of the complaint, the Respondent added “Paid for by” to his candidate website and notified PDC staff.

Summary and Resolution

Your late reporting is partially mitigated by the fact that all your late C-4 reports and all but two of your late C-3 reports were filed by May 15, 2025, which is well in advance of the August 5th Primary Election. It should be noted that both your pre-Primary C-4 reports were timely filed. As a result, noncompliance had a minimal impact on the public, who were not deprived of timely or accurate information during a time-sensitive period in the election cycle.

Your good-faith omission of “Paid for by” on your candidate website is mitigated by the fact that 1) partial sponsor ID was present, so the identity of the sponsor was known; and 2) you quickly took corrective action to add the missing phrase.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely and accurately disclose all contribution and expenditures. PDC staff expect you to timely file all required reports of contributions and expenditures in the future. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff are also reminding you about the importance of 1) providing complete sponsor ID on political advertising, including your candidate website; and 2) timely amending reports within 21 days of the original reports, whenever possible, in accordance with the PDC laws, rules or guidance.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

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

Sincerely,

Electronically signed by Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed by Kim Bradford
Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: Conner Edwards