



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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August 13, 2025

Delivered electronically to [cmaccaul@aarp.org](mailto:cmaccaul@aarp.org) and [rgordon@perkinscoie.com](mailto:rgordon@perkinscoie.com)

Subject: PDC Case 174331 regarding AARP No on I 2124 Sponsored by AARP Washington State

Dear Cathy MacCaul, Treasurer,

The Public Disclosure Commission (PDC) completed its review of two complaints filed by Conner Edwards on June 11, 2025 and July 11, 2025.

The initial complaint alleged a violation by AARP No on I 2124 Sponsored by AARP Washington State (the Committee) of RCW 42.17A.235 and .240 for failing to disclose contributions and expenditures for payment of an enforcement penalty and payment of legal expenses incurred.

The supplemental complaint alleged violations by the Committee of RCW 42.17A.235 and .240, as follows:

- That the C-4 report filed in response to the June 11, 2025 complaint was filed two months late.
- That vendor addresses were missing on the Committee's Jan. 1, 2025 to June 30, 2025 C-4 report in the description of in-kind contributions.
- That the Committee failed to report a debt for the suspended portion of the penalty.
- That the Committee's legal services totaling \$83,696 may represent work done during the election or at some period from Dec. 2024 to March 2025 and that debt for such services may not have been reported on earlier C-4 reports.

**Background and Findings**

- On June 25, 2025, Cathy MacCaul, Treasurer for the Committee, stated that she searched the PDC website looking for guidance on whether or how to report the payment of a penalty that was an in-kind contribution. MacCaul stated she could not find that information and called the PDC on May 30, 2025, and was told that if the money to pay the penalty did not come out of committee funds, it did not need to be reported. PDC staff could not verify whether such advice was given.

- On July 10, 2025, the Committee submitted a C-4 report covering the period Jan. 1, 2025 to June 30, 2025, disclosing in-kind contributions from AARP Washington State for the payment of a PDC enforcement penalty, and for legal services provided by the law firm Perkins Coie.
- On Aug. 1, 2025, MacCaul amended the July 10, 2025 C-4 by providing the address of the law firm providing legal services.
- On August 4, 2025, MacCaul responded to the supplemental complaint, stating, “As requested, the Committee amended the 1/1/2025 to 6/30/2025 C-4 report to publicly disclose the address of the vendor providing legal services. The address was previously included in the Memo section of the online form. The legal services were in connection with representation of AARP No on I 2124 Sponsored by AARP Washington State in enforcement before the Public Disclosure Commission and were not provided in connection with the 2024 election.”

### Summary and Resolution

In accordance with WAC 390-37-070, the executive director, at any time prior to consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted.

In this instance, the failure to timely file C-4 Reports for April and May 2025 to disclose in-kind contributions for legal services and the payment of an enforcement penalty, and the failure to include subvendor addresses does not amount to a violation that warrants further investigation.

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 Phil Stutzman at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

*Electronically signed by Phil Stutzman*

Phil Stutzman  
Compliance Officer

Endorsed by,

*Electronically signed by Peter Frey Lavallee*

Peter Frey Lavallee  
Executive Director

cc: Conner Edwards