



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

September 18, 2024

Delivered electronically to International Association of Heat and Frost Insulators and Allied Workers PAC at rreap@insulators.org and awade@insulators.org

Subject: Complaint filed by Conner Edwards, PDC Case 156213

Dear Robert Reap:

Below is a copy of an electronic letter sent to Connor Edwards concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Edwards, the PDC has dismissed this matter following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, per WAC 390-37-060(1)(d), this serves as a formal written warning concerning the requirement under RCW 42.17A.250 for failing to timely and accurately report as an out-of-state political committee in the 2024 election year. Staff expects the International Association of Heat and Frost Insulators and Allied Workers PAC, moving forward, to follow all statutes and rules about reporting of expenditures supporting or opposing a Washington state candidate or political committee. If violations of PDC statutes or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

If you have questions, you may contact Tanya Mercier by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

/s/ Electronically signed

Peter Frey Lavallee
Executive Director



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September 18, 2024

Delivered electronically to Conner Edwards at cg.edwards53@gmail.com

Subject: Complaint against International Association of Heat and Frost Insulators and Allied Workers PAC, PDC Case 156213

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on June 14, 2024. The complaint alleged that the International Association of Heat and Frost Insulators and Allied Workers PAC, a political committee, may have violated RCW 42.17A.250 by failing to timely and accurately report as an out-of-state political committee.

PDC staff reviewed the allegation(s); the applicable statutes and rules, and reporting requirements; the response(s) provided by the Respondent; the applicable PDC reports filed by the Respondent; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- The International Association of Heat and Frost Insulators and Allied Workers PAC is registered with the Federal Elections Commission under ID C00115527. The PAC is a connected organization to the International Association of Heat & Frost Insulators and Allied Workers. Robert Reap is the Treasurer of record.
- During the case review, staff discovered the PAC had taken part in elections supporting campaigns in the 2024 election.
 - On June 17, 2024, the International Association of Heat and Frost Insulators and Allied Workers PAC made the following contributions to Washington state candidates:
 - Clyde Shavers, \$500
 - Sam Low, \$500
 - Patrick DePoe, \$1,000

An Out-of-State Political Committee (C-5) Report, was due by July 10, 2024 but was not submitted until July 30, 2024.

- Since the PACs expenditures were reported prior to the Primary Election, the public was not fully deprived of critical information prior to an election.
- The respondent does not have other similar warnings or violations of PDC requirements.

Based on our findings staff has determined that, in this instance, failing to timely and accurately report as an out-of-state political committee does not amount to a violation that calls for further investigation.

Per WAC 390-37-060(1)(d), however, the International Association of Heat and Frost Insulators and Allied Workers PAC will receive a formal written warning concerning the requirement under RCW 42.17A.250 for failing to timely and accurately report as an out-of-state political committee. Staff expects the International Association of Heat and Frost Insulators and Allied Workers PAC, moving forward, to follow all statutes and rules about reporting of expenditures supporting or opposing a Washington state candidate or political committee. If violations of PDC statutes or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

Based on this information, the PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, you may contact Tanya Mercier by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavalley
Executive Director

cc: International Association of Heat and Frost Insulators
and Allied Workers PAC