



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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March 17, 2025

Delivered electronically to [gpfundstein@rumbleup.com](mailto:gpfundstein@rumbleup.com) and [gmadison@rumbleup.com](mailto:gmadison@rumbleup.com)

Subject: PDC Case 164764 regarding RumbleUp

RumbleUp:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on December 24, 2024. The complaint alleged violations of RCW 42.17A.345 for failing to timely provide complete commercial advertiser books of account upon request.

Applicable Laws & Rules

RCW 42.17A.345 and WAC 390-18-050 require commercial advertisers to make their documents and books of account open for public inspection during normal business hours for five years following the election to which the records pertain. Pursuant to RCW 42.17A.345, the documents and books of account shall specify: 1) the names and addresses of persons from whom it accepted political advertising or electioneering communications; 2) the exact nature and extent of the services rendered; and 3) the total cost and the manner of payment for the services.

WAC 390-18-050(3) states that commercial advertisers can provide such information to the requester in person during normal business hours or by email or online publication.

Background & Findings

- RumbleUp is a commercial advertiser that is listed in PDC expenditure records as providing political advertising services.
- The complainant stated they sent an email to RumbleUp on December 19, 2024, and provided a document showing an email sent from cg.edwards53@gmail.com to [helpdesk@rumbleup.com](mailto:helpdesk@rumbleup.com) and [info@rumbleup.com](mailto:info@rumbleup.com). The email stated: "Per RCW 42.17A.345, I am requesting to view your (RumbleUp) commercial advertising books of account."
- On January 7, 2025, PDC staff contacted RumbleUp. After receiving clarification from PDC staff regarding who was the responsible party, on March 4, 2025, the company responded to the complainant with the requested records.

Summary and Resolution

It appears that, prior to the complaint, you were not fully aware of the requirement to make books of account available for public inspection. After being informed about the law, however, you did not respond to the complainant's request in a timely manner.

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purposes of this chapter. Under WAC 390-37-060, 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.

PDC staff is reminding you about the importance of the requirements under RCW 42.17A.345 and WAC 390-18-050 to respond to a request for inspection of books of account. Staff expects you, in the future, to respond to requests to review your books of account per requirements associated with commercial advertisers and political advertisements.

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 Tabitha Townsend at 1-360-586-4555, 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 Tabitha Townsend

Tabitha Townsend  
Compliance Officer

Endorsed by,

Electronically signed by Kim Bradford

Kim Bradford  
Deputy Director  
For Peter Frey Lavalley  
Executive Director

cc: Conner Edwards