

Respondent Name
AMM Political Strategies
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards reported via the portal (Thu, 6 Jan 2025 at 9:13 AM)</p> <p>Description of Complaint</p> <p>See attached complaint.</p> <p>Notice to Respondent</p> <p>I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff.</p> <p>This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state’s campaign finance laws.</p> <p>What are these shortcomings?</p> <p>Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.</p> <p>I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency’s problems become impossible to ignore.</p> <p>Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/</p> <p>If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.</p> <p>“I am no longer accepting the things I cannot change. I am changing the things I cannot accept.” — Angela Davis</p>
What impact does the alleged violation(s) have on the public?
See complaint. The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency’s failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.
List of attached evidence or contact information where evidence may be found
See complaint and also PDC website.
List of potential witnesses with contact information to reach them
See complaint and also PDC website.
Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

Expenditures

Search expenditures by all candidates and political committees since 2007. Campaigns are required to itemize any expense of more than \$50. Donated goods and services (known as in-kind contributions) also appear as expenditures, with the contributor listed in the recipient column.

Results for:

Recipient Name: AMM Political ✕

Expenditure Date: 01/01/2020-01/06/2025 ✕

^ Hide Filters Search Tips

Candidate/Committee Name

Enter text

X

Election Year

Select

X

Campaign Type

Select

X

Recipient Name

AMM Political

X

Expenditure Date

01/01/2020

01/06/2025

X

Amount

From

To

X

City

Enter text

X

State

Select

X

Description

Enter text

X

Show 50 entries

[Download 17 rows as CSV.](#)

Candidate/Committee Name ▲	Election year ▼	Campaign Type ◆	Recipient Name ◆	Expenditure Date ◆	Amount ▼	Description ◆	City ◆	State ◆	Re
CITIZENS FOR LIBERTY AND LABOR	2024	Political Committee	AMM Political Strategies	11/04/2024	\$368.70	Agency fees for text advertising	Fort Worth	TX	View Receipt
CITIZENS FOR LIBERTY AND LABOR	2024	Political Committee	AMM Political Strategies	11/04/2024	\$5.10	TV Plus streaming 39 impressions 11/01 - 11/05	Fort Worth	TX	View Receipt
Erasmo Ruiz Gonzalez	2023	Candidate	AMM Political Strategies	10/25/2023	\$500.00	Phone bank service for GOTV calls	Fort Worth	TX	View Receipt
Erasmo Ruiz Gonzalez	2023	Candidate	AMM Political Strategies	10/25/2023	\$234.35	Live GOTV calls	Fort Worth	TX	View Receipt
Fuse Votes	2020	Political Committee	AMM POLITICAL STRATEGIES LLC	10/31/2020	\$2,649.70	get out the vote texting program	Fort Worth	TX	View Receipt
ONE AMERICA VOTES JUSTICE FUND	2022	Political Committee	AMM POLITICAL STRATEGIES	11/07/2022	\$18,821.25	IE 15057 paid live calls 100% pro Claudia Kauffman	Fort Worth	TX	View Receipt
ONE AMERICA VOTES JUSTICE FUND	2022	Political Committee	AMM POLITICAL STRATEGIES	11/07/2022	\$6,482.50	IE 5186 paid live calls 100% pro Dulce Gutierrez	Fort Worth	TX	View Receipt
ONE AMERICA VOTES JUSTICE FUND	2022	Political Committee	AMM POLITICAL STRATEGIES	12/07/2022	\$1,199.00	paid 1199 calls balance due previously reported (pro-Dulce Gutierrez)	Fort Worth	TX	View Receipt
Our Votes Count	2024	Political Committee	AMM Political Strategies	11/04/2024	\$1,315.74	GOTV Text Messaging (25,062)	Fort Worth	TX	View Receipt

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description	City	State	Re
Our Votes Count	2024	Political Committee	AMM Political Strategies	11/04/2024	\$438.60	Text Messaging (25,062) opposing I-2117, I-2109, I-2024, I-2066	Fort Worth	TX	View Record
Our Votes Count	2023	Political Committee	AMM Political Strategies	11/09/2023	\$1,010.00	GOTV Text Messaging	Fort Worth	TX	View Record
Our Votes Count	2022	Political Committee	AMM POLITICAL STRATEGIES	11/08/2022	\$2,113.20	GOTV Voter Texting	FORTH WORTH	TX	View Record
Our Votes Count	2021	Political Committee	AMM POLITICAL STRATEGIES	12/03/2021	\$932.54	Management and consulting services	Forth Worth	TX	View Record
Stand for Children Washington PAC	2023	Political Committee	AMM POLITICAL STRATEGIES LLC	10/24/2023	\$12,531.20	Paid phones	FORT WORTH	TX	View Record
Stand for Children Washington PAC	2023	Political Committee	AMM POLITICAL STRATEGIES LLC	11/17/2023	\$1,850.20	Paid phones campaign	FORT WORTH	TX	View Record
Stand for Children Washington PAC	2022	Political Committee	AMM POLITICAL STRATEGIES LLC	11/07/2022	\$8,241.02	Live calls and texting	Fort Worth	TX	View Record
Stand for Children Washington PAC	2022	Political Committee	AMM POLITICAL STRATEGIES LLC	10/31/2022	\$4,807.10	Live persuasion calls	Fort Worth	TX	View Record

Showing 1 to 17 of 17 entries (filtered from 1,082,112 total entries)

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- Glossary
- Request PDC Records

Other Election Agencies

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For Incidental Committees

For Lobbyists

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Political Disclosure Reporting Data

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Conner Edwards <cg.edwards53@gmail.com>

RCW 42.17A.345 Request (AMM Political Strategies)

J.D. Angle <jd@amppolitical.com>

Mon, Jan 6, 2025 at 9:05 AM

To: Conner Edwards <cg.edwards53@gmail.com>

Cc: team@amppolitical.com

Dear Mr. Edwards, AMM Political Strategies does not provide commercial political advertising.

J.D. Angle
he/him/his

AMM Political Strategies, LLC
817-808-8414 M
202-780-0800 or
817-780-0800 O
jd@jdangle.com
jd@amppolitical.com

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all devices.

On Jan 4, 2025, at 8:36 PM, Conner Edwards <cg.edwards53@gmail.com> wrote:

Hello:

Per RCW 42.17A.345, I am requesting to view your (AMM Political Strategies') commercial advertising books of account.

See link for additional information: <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/commercial-advertiser-disclosure-guide>

Please let me know if you need additional information from me to process this request.

If you have any questions about this request, you should contact the PDC immediately at (360) 753-1111

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Best,

Conner Edwards
(425) 533-1677 cell
<AMM Political Strategies.pdf>

Complaint Against: AMM Political Strategies

Submitted: 1/6/25

Notice to Respondent by: 1/16/25 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 4/6/25 per RCW 42.17A.755(3)

Statutes Violated: RCW 42.17A.345, see also WAC 390-18-050

Background

Commercial Advertiser Disclosure Law

Washington state law allows any member of the public to request information about a political advertisement from the company that provided the advertising.¹ These companies are referred to as “commercial advertisers” in the law.

This disclosure, which dates back 50 years to Initiative 276 which created the PDC, is an important counterpart to the reporting done by campaigns and sponsors of independent expenditures. It also provides critical information when sponsors of political advertising fail to identify themselves.

A commercial advertiser is defined as any person or entity that sells a service communicating messages or producing material for distribution to the public, when the message includes an appeal for votes or financial support in an election campaign.

Examples include, but are not limited to, print shops, copying center businesses, direct mail services, billboard companies, broadcasters, print or online publications and online digital platforms. See RCW 42.17A.005(10), RCW 42.17A.345 and WAC 390-18-050.

Violations

On January 4th, 2025, I sent an e-mail to the respondent requesting to see their commercial advertising books of account. See attached.

I received the attached response, denying my request.

WAC 390-18-050(4)(b)(i) requires that the information required to be maintained by commercial advertisers must be provided “[b]y digital transmission, such as email, promptly upon request, but no later than two business days”.

A list of political expenditures made to the respondent can be found here (also attached):

https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/expenditures?recipient_name=AMM+Political&expenditure_date=01%2F01%2F2020-yadcf_delim-01%2F06%2F2025

¹ <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/commercial-advertiser-disclosure-guide>

Conclusion

The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.

I am filing this complaint with the hopes that the PDC can rapidly bring the respondent into compliance with RCW 42.17A.345.

Best,

Electronically signed Conner Edwards

/s/ Conner Edwards

Complainant

Notice to Respondent

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I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.

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