



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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April 22, 2025

Delivered electronically to jd@ammpolitical.com , team@ammpolitical.com and cg.edwards53@gmail.com

Subject: PDC Case 165916 regarding AMM Political Strategies

Dear AMM Political Strategies:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on January 6, 2025. The complaint alleged a violation of RCW 42.17A.345 for failure to provide a commercial advertiser books-of-account inspection upon request.

Applicable Laws and Rules

- [RCW 42.17A.345](#) requires each commercial advertiser¹ who has accepted or provided political advertising² or electioneering communications during an election to maintain current books-of-account and related materials, as provided by rule, and make them available and open for inspection during normal business hours during the election and for a period of no less than five

¹ A "commercial advertiser" means any person (defined below) that sells the service of communicating messages or producing material for broadcast or distribution to the general public (or segments thereof), whether through brochures, fliers, newspapers, magazines, television, radio, billboards, direct mail advertising, printing, paid internet or digital communications, or any other means of mass communications used for the purpose of appealing, directly or indirectly, for votes or for financial or other support in any election campaign. [RCW 42.17A.005\(10\)](#).

A "person" includes "an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized." [RCW 42.17A.005\(39\)](#).

² "Political advertising" includes any advertising displays, newspaper ads, billboards, signs, brochures, articles, tabloids, fliers, letters, radio or television presentations, digital communication, or other means of mass communication (defined below), used for the purpose of appealing, directly or indirectly, for votes or for financial or other support or opposition in any election campaign. [RCW 42.17A.005\(40\)](#)

"Mass communication" means a communication, digital or otherwise, intended to reach a large audience through the methods described in [WAC 390-05-290\(1\)\(a\)-\(g\)](#), which includes, but is not limited to, text messages that are identical or substantially similar in nature, directed at specific recipients, and sent within a 30 day period.

years after the date of the applicable election. These documents and books-of-account shall include the following:

- 1) the names and addresses of persons from whom the commercial advertiser accepted political advertising or electioneering communications (also referred to as the “sponsor”);
 - 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](#) states that commercial advertiser books-of-account information must be made available for public inspection by any person in one of the following manners:
 - 1) in person during normal business hours;
 - 2) electronically, in machine readable format and structured in a way that enables the data to be fully discoverable and usable by an end user;
 - 3) by digital transmission, such as email, promptly upon request, but no later than two business days; or
 - 4) by online publication on the advertiser’s primary website or on a website created for this purpose that is controlled by the advertiser, if a link is prominently displayed on the advertiser’s primary website directing users to the latter.
 - Per [WAC 390-18-050\(3\)](#), commercial advertiser books-of-account must be updated within 24 hours of the distribution or broadcast of an advertisement or communication and any updates or changes to this information.
 - [WAC 390-18-050\(6\) & \(7\)](#) provide a detailed list of the information to be maintained and made available for public inspection, including but not limited to: 1) the name of the candidate or ballot proposition supported or opposed; 2) a copy of the advertisement or communication; 3) the name and address of the sponsor of the advertising or communication; 4) dates of service; 5) the total cost; 6) payment information (who paid, date paid, and payment method used); and 7) a description of the major work components or tasks performed.

Background and Findings

- Angle Mastagni Mathews Political Strategies or AMM Political Strategies (the “Respondent”) is a company located in Texas that provides text messaging, telephone and other services to candidates and campaigns.
- On January 4, 2025, Conner Edwards (the “Complainant”) emailed the Respondent requesting to view (inspect) their commercial advertising books-of-account.
- The Respondent replied to the Complainant by email on January 6, 2025, and indicated the company “does not provide commercial political advertising.”

- The Complainant filed a complaint with the PDC on January 6, 2025, alleging the Respondent denied his request to inspect their commercial advertiser books-of-account. Included with the complaint was a printout from the PDC's website showing expenditures made to AMM Political Strategies in years 2020-2024 by candidate campaigns and political committees registered with the PDC.
 - Mr. Edwards also alleged that the Respondent was required to provide their books-of-account information to him by digital transmission (e.g. email) promptly upon request and within two business days, but WAC 390-18-050 states that commercial advertisers have the option to provide records in-person, digitally, electronically or via online publication.
- On March 3, 2025, the Respondent replied to the complaint allegation by email and said the following:
 - They said the commercial advertiser requirements lack clarity and the PDC's confirmation that text messages constitute a form of mass communication was helpful.
 - The company indicated its wish to comply and create transparency in campaign finance and provided the PDC with a spreadsheet containing their commercial advertiser books-of-account.
- The Respondent confirmed that they forwarded their books-of-account information to the Complainant on March 13, 2025, pursuant to his inspection request.
- The Respondent does not have previous warnings/violations of PDC requirements.

Summary and Resolution

Noncompliance appears to be the result of a good-faith misunderstanding regarding what types of services constitute commercial advertising under PDC laws and rules.

Based on our findings, staff has determined that, in this instance, your failure to make commercial advertiser books-of-account available for inspection does not amount to a violation that warrants further investigation.

However, PDC staff are reminding you about the importance of timely making all the information required for a commercial advertiser books-of-account inspection available to requestors in the future in accordance with the PDC laws, rules or guidance. This may necessitate collecting, for example, client addresses, querying additional payment information (who paid, date paid, payment type), and retaining the content of text communications for five years. A list of the information that commercial advertisers are required to provide for a books-of-account inspection can be found in [RCW 42.17A.345](#) and [WAC 390-18-050\(6\) & \(7\)](#).

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 pdcc@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