



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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July 30, 2025

Delivered electronically to contact@ruralamericansunited.org

Subject: PDC Case 169868 regarding Rural Americans United

Rural Americans United
Doug White, CEO/Treasurer
Tracy Hernandez, Ministerial Treasurer

The Public Disclosure Commission (PDC) completed its review of the two complaints filed by Conner Edwards on April 1, 2025 and July 1, 2025. The April 1, 2025 complaint alleged that Rural Americans United (the Committee or RAU) may have violated RCW 42.17A.235 and .240 by failing to accurately file reports of contributions and expenditures because the Line 18 Cash on Hand balance on the December 2024 C-4 report does not match the Line 1 Beginning Receipts balance for the January 2025 C-4 report.

The July 1, 2025 complaint alleged that the Committee reported an expenditure in the amount of \$1,109.82 nearly a year late and may have failed to report subvendor information for the expenditure.

Applicable Laws and Rules

[RCW 42.17A.205](#) requires every political committee to register with the PDC by filing a *Committee Registration* (C-1pc report) within two weeks of organization or the date it first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. A committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on C-3 reports and C-4 reports pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the committee's election participation, and their financial activity.

Background and Findings

- Rural Americans United has been registered with the PDC as a political committee since 2023, receiving its first contribution on Feb. 10, 2023 and making its first expenditure on Feb. 15, 2023. The Committee's CEO and Treasurer is Doug White and the Committee's Ministerial Treasurer is Tracy Hernandez.

- Hernandez initially stated she reviewed the committee's records and found no evidence of unreported contributions or deposits that would explain why the Line 18 Cash on Hand balance on the Dec. 2024 C-4 report did not match the Line 1 balance on the Jan. 2025 C-4 report.
- Staff confirmed that the committee's December 2024 C-4, Line 18, Cash on Hand Balance was \$53,587.45 while the amount carried forward to Line 1 of the January 2025 C-4 was \$4,771.72 higher at \$58,359.17.
- Staff explained that the proper way to "close out" each year is to carry forward the December, Line 18 Cash on Hand balance to the January Line 1 beginning Receipts balance.
- Staff explained that the amount carried forward should equal the Committee's "reconciled" bank balance at the same point in time, accounting for outstanding checks and other items not reflected on the bank statement.

PDC Staff Assistance

- A PDC Disclosure Specialist spoke with the Committee's Ministerial Treasurer, who agreed to review the Committee's contributions starting with the 2023 campaign to ensure that all contributions have been reported on C-3 and C-4 reports.
- The Ministerial Treasurer amended C-3 and C-4 reports as needed from 2023 to 2025.
- Doug White, CEO and Treasurer, stated the Committee thought, when it amended C-3 reports, that the updated contribution totals would be transferred to the relevant C-4 reports without a need to amend the C-4 reports.
- Staff reviewed amended C-4 reports covering reporting periods Feb. 2023 through Oct. 28, 2024, filed through June 22, 2025, and found several instances where contributions and expenditures of various amounts were amended to correct the reports.
- The C-4 reports covering the periods Oct. 29, 2024 through May 2025 did not carry forward the correct balances to Lines 1 and 10 for Receipts and Expenditures. At staff's request, the Committee refiled the relevant seven reports as amendments on June 29, 2025. However, due to confusion about whether to carry forward the Dec. 2024 Line 18 Cash on Hand balance of \$48,308.92 or the total bank account balance of \$52,042.64, that appeared on the PDC website Dashboard, an incorrect carryforward amount was entered on Line 1 of the January 2025 C-4 report. After consulting with PDC staff, the Committee filed additional amendments for the January through May 2025 C-4 reports to reflect correct Line 1 and Line 10 carryforward balances.

Supplemental Complaint Filed July 1, 2025

- The July 1, 2025 supplemental complaint alleged that when the Committee amended its timely filed June 1 to July 15, 2024 C-4 report approximately 11 months later on June 22, 2025, it disclosed a previously unreported June 13, 2024 expenditure in the amount of \$1,109.82, payable to Wix.com, Inc. The supplemental complaint also alleged that the Committee may have failed to report subvendor information for the expenditure, described as *"Purchase of item from website for donor giveaway."* The amended C-4 report also added the proceeds of a Low Cost Fundraiser received and deposited on June 17, 2024 totaling \$1,066.53. The C-3 report for the June 17, 2024 Low Cost Fundraiser was also filed June 22, 2025.
- On July 23, 2025, the Committee amended the June 1 to July 15, 2024 C-4 report a second time to include a more understandable description of the expenditure to Wix.com, Inc., the company that manages the Rural Americans United website and operated the Low Cost Fundraiser for RAU. The only change to the July 23, 2025 C-4 amendment was in the description of the

\$1,109.82 expenditure to Wix.com, Inc., which was amended to read, *“Purchase of multiple small items from Rural Americans United website for donor gifts.”* The multiple small items, which included hats and coffee mugs, were used as incentive gifts for participants in the Low Cost Fundraiser. There were no subvendors.

- RAU stated that the original C-4 report, timely filed July 16, 2024, included only the “net expense” to Wix.com, Inc. for the Low Cost Fundraiser and that it should have disclosed receipts and expenditures separately. While amending C-4 reports to correct the beginning and ending balances, the Ministerial Treasurer realized the Low Cost Fundraiser had not been properly reported and amended the C-4 report for June 1 to July 15, 2024 to show the receipts and expenditures for the Low Cost Fundraiser separately, even though the net monetary effect did not change.

Prior Cases

On Oct. 8, 2024, PDC staff closed Case 156691 regarding RAU with a written warning for failing to timely and accurately disclose contributions on C-3 and C-4 reports and failing to include adequate expenditure details on C-4 reports. The Committee filed amended reports and was in compliance prior to the 2024 primary election.

On Feb. 20, 2025, PDC staff closed Case 161500 with a no-penalty Statement of Understanding, in which RAU acknowledged a violation for failing to timely file one or more C-3 or C-4 reports. However, based on Commission guidance concerning caseload levels, staff also dismissed any allegations regarding reporting for the 2024 election that were not otherwise addressed in Case 161500.

Summary and Resolution of Current Complaint

Rural Americans United did not initially properly carry forward the December 2024 Line 18 Cash on Hand balance to the January 2025 Line 1 Beginning Receipts balance. The Ministerial Treasurer reviewed all contributions received starting in 2023 and amended C-4 reports to show the proper carryforward balance from December 2024 to January 2025. The Committee timely filed its June 1, 2024 to July 15, 2024 C-4 report, showing the “net expense” for a Low Cost Fundraiser and amended the report on June 22, 2025 to show the receipts and associated expenditures for the Low Cost Fundraiser. RAU amended the C-4 report a second time on July 23, 2025 to include a more understandable description of the expenditure to Wix.com, Inc. for the Low Cost Fundraiser.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

However, pursuant to WAC 390-37-060(1)(d), you are receiving a formal written warning concerning the inaccuracies on C-4 reports that needed to be corrected and your failure to properly carry forward balances from the end of one year to the start of the next year. PDC staff expects that, going forward, you will carefully review C-4 reports and properly carry forward the December Cash on Hand balance to the beginning balance for Receipts on the January C-4 report, as well as include full, accurate expenditure descriptions in future reports. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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 pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Phil Stutzman

Phil Stutzman

Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee

Executive Director

cc: Conner Edwards, Complainant