



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

January 13, 2021

Delivered electronically to Kaitlin Vintertun on behalf of Washington State Republican Party at
“kaitlinvintertun@wsrp.org”

Subject: Complaint filed by Bret Uhrich, PDC Case 78860

Dear Kaitlin Vintertun:

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

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

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-
601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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January 13, 2021

Delivered electronically to Bret Uhrich at “buhrich@lawschool.gonzaga.edu”

Subject: Complaint regarding Washington State Republican Party, PDC Case 78860

Dear Bret Uhrich:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 15, 2020. The complaint alleged that Washington State Republican Party (WA GOP), a bona fide state party committee, may have violated RCW 42.17A.320 and WAC 390-18-030 for failure to disclose sponsor identification on political advertising distributed by WA GOP via text message.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Executive Director, Kaitlin Vintertun on behalf of WA GOP (the “Respondent”); and written PDC guidance regarding sponsor identification alternatives for advertisements delivered via text message, to determine whether the record supports a finding of one or more violations.

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

- RCW 42.17A.320 requires all written political advertising to include the sponsor's name and address unless otherwise exempt.
- The PDC has written guidance on the agency’s website describing acceptable alternatives to the full sponsor identification required for political advertisement via text message, which is considered an online transmission method under WAC 390-05-290. The PDC has advised political committees that text messages are eligible to use the small online ad alternative outlined in WAC 390-18-03, which allows sponsor ID to be provided using an "automatic display" that takes the reader directly to the required disclosures.
- The complaint included a screenshot of a text message and alleged that it was sponsored by WA GOP but did not include the required sponsor identification.
- In her response, Executive Director Vintertun, stated that the text message was part of the party’s federal get out the vote (GOTV) effort and that the party followed the Federal Election Commission’s (FEC) requirements. She further stated that she believed the text message did clearly identify the sponsor’s name.
- Staff’s review found that the text message did include the name of the sponsor “WA GOP” as part of the general GOTV effort.

Based on the response submitted by Exec. Director Vintertun, it appears that the intent of the text message was to encourage voting, specifically voting for republican backed candidates and agenda items, as part of a “get out the vote” (GOTV) effort and that the sponsor of the message was likely easy to discern by the recipient with the name “WA GOP” included.

Based on our findings staff has determined that, in this instance, no evidence supports a finding of a violation that warrants further investigation.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed
Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Kaitlin Vintertun for WA GOP