



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action
Against

Washington State Republican Party (Non-
Exempt & Exempt Accounts)

Respondent.

PDC Case 146593

Notice of Administrative Charges
(AMENDED)

JURISDICTION

The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure laws; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

ALLEGATIONS

PDC Staff alleges that the Respondent, the Washington State Republican Party, a Bona Fide State Party Committee with an Exempt and Non-Exempt account, violated: (1) RCW 42.17A.320, by failing to include sponsor identification on political advertising; (2) RCW 42.17A.235 and RCW 42.17A.240 by failing to timely disclose expenditures made on Summary Full Campaign Contribution and Expenditure reports (C-4 reports); (3) RCW 42.17A.405 and WAC 390-17-060 by making a contribution to a ballot measure committee using exempt funds; (4) RCW 42.17A.235 and RCW 42.17A.240 by failing to timely and accurately disclose the source of monetary contributions on Monetary Contributions reports (C-3 reports), and RCW 42.17A.220 by depositing overlimit anonymous contributions.

FACTS

1. The Washington State Republican Party (WSRP) is a Bona Fide State Party Committee with an Exempt and Non-Exempt account both registered with the Public Disclosure Commission (PDC) during calendar years 2023 and 2024.
2. On October 26, 2023, WSRP disseminated a text message opposing Han Tran, a 2023 Northshore School Director candidate running against Myriam Juritz, but failed to include sponsor identification on the advertisement.
3. On January 26, 2024, WSRP Non-Exempt amended the 7-day Pre-General C-4 report covering campaign activity from October 17 – 30, 2023. The C-4 report disclosed a \$159.22 debt owed to Prompt.io for “GOTV text messages – Myriam Juritz Northshore School Dis. Dir. Pos. 3” made on October 26, 2023. The expenditure was disclosed 87 days late.
4. On January 10, 2024, WSRP Exempt submitted a C-4 report covering activity for December 2023 and disclosed a \$100,000 monetary contribution to Let’s Go Washington, a ballot measure committee registered with the PDC to support six statewide initiatives. The contribution was not earmarked for exempt activities and made using Exempt funds.
5. On September 23, 2024, WSRP Exempt submitted a C-3 report disclosing anonymous contributions totaling \$106,500 deposited on September 17, 2024.

LAW

RCW 42.17A.005(40) states: "Political advertising" includes any advertising displays, newspaper ads, billboards, signs, brochures, articles, tabloids, flyers, letters, radio or television presentations, digital communication, or other means of mass communication, 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.320(1) states, in relevant part: All written political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name and address.

RCW 42.17A.235 and **RCW 42.17A.240** require political committees to file timely, accurate reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-3 and C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report; on the twenty-first day and the seventh day immediately preceding the date on which the election is held; and on the tenth day of the first month after the election.

RCW 42.17A.405(15) identifies contributions exempt from the contribution limits of this section including: (a) An expenditure or contribution earmarked for voter registration, for absentee ballot information, for precinct caucuses, for get-out-the-vote campaigns, for precinct judges or inspectors, for sample ballots, or for ballot counting, all without promotion of or political advertising for individual candidates; (b) An expenditure by a political committee for its own internal organization or fund-raising without direct association with individual candidates; or (c) An expenditure or contribution for independent expenditures as defined in RCW [42.17A.005](#) or electioneering communications as defined in RCW [42.17A.005](#).

WAC 390-17-060 defines "Exempt contributions" as contributions made to a political committee which are earmarked for exempt activities¹ as described in RCW [42.17A.405](#). Such contributions are required to be reported under RCW [42.17A.240](#), are subject to the restrictions in RCW [42.17A.420](#), but are not subject to the contribution limits in RCW [42.17A.405](#).

RCW 42.17A.220(4) states, in relevant part: Accumulated unidentified contributions, other than those made by persons whose names must be maintained on a separate and private list by a political committee's treasurer pursuant to RCW [42.17A.240\(2\)](#), in excess of one percent of the total accumulated contributions received in the current calendar year, or three hundred dollars, whichever is more, may not be deposited, used, or expended, but shall be returned to the donor if his or her identity can be ascertained.

RESPECTFULLY SUBMITTED this 14th day of October 2024.

Electronically Signed Peter Frey Lavallee

Peter Frey Lavallee
Executive Director
