



**Response to PDC Complaint for 2024 General Election:
Ballot Initiative Opposition**

1/13/2025

To Whom It May Concern,

For 30+ years, Earth Ministry/Washington Interfaith Power and Light has been committed to helping people of faith and conscience care for the well-being of our communities and the environment. We strive to empower people to share their own stories of why caring for creation, the planet, and creatures matter. We seek to share tools and resources needed to build collective momentum for changing the world for the better.

That said, we too are still learning. Last year for the first time we sought to develop a robust program that would mobilize people of faith and conscience across Washington State to speak up for the protection of the Climate Commitment Act by advocating against ballot Initiative 2117. While we have a long history of advocating for strong environmental policies, 2024 was the first year that we sought specific funding to aid our efforts. Starting in June of 2024 we reached out to the PDC hotline to try and understand the rules and requirements for publicly advocating against ballot initiatives. While the rules were complex, we believed we had a firm understanding and believed that the small amount requested, around \$5,000, would fall beneath the threshold and thus did not move forward with reporting to the PDC. We continued with our work, promoting No On 2117 as part of the growing coalition, and provided both digital and printed materials to churches, synagogues, and other sacred communities.

However, in late October 2024 we realized we had made a mistake. It was not until we began talking with other members of the coalition, we realized we might be out of compliance with the PDC, both filing reports and registering as a PAC. Immediately we sought legal advice and were encouraged to set up a PAC with the PDC as well as prepare the monthly reports for filing. Once that process was completed and we were fully registered, we filed all the outstanding reports at one time.

It was never our intention to ignore the PDC's rules and requirements of 501(c)3s engaging in ballot initiative opposition work. We simply wanted to help mobilize our community to protect Washington's air, water, and reduce the harmful impacts of pollution. While we believed by calling the hotline earlier in the year, we had followed the necessary steps required of us, we know now we will need more legal advice and oversight if we are to engage in political fundraising again. We now have a clearer understanding of the requirements for nonprofits engaging in political fundraising, even for small amounts, and have developed relationships with knowledgeable professionals who can help guide us in the future should we choose to engage in this activity again.

Thank you for the opportunity to explain our process. We pray that the Commission will see our efforts to correct our errors and the work we have done to ensure we do not repeat the same ones in the future.

Thank you,

Rev. AC Churchill (They/Them)

Executive Director, Earth Ministry/Washington Interfaith Power and Light