

Respondent Name
Jane Fonda Climate PAC & Jane Fonda
Complainant Name
Conner Edwards
Complaint Description
<p><u>Conner Edwards</u> reported via the portal <i>(Tue, 5 Nov 2024 at 11:04 AM)</i></p> <p>Description of Complaint</p> <p>See attached complaint.</p> <p><u>Notice to Respondent</u></p> <p>I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff with a so-called "warning letter".</p> <p>This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state’s campaign finance laws.</p> <p>What are these shortcomings?</p> <p>Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.</p> <p>I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency’s problems become impossible to ignore.</p> <p>Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/</p> <p>If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.</p> <p>“The journey of a thousand miles begins with a single step.” — Lao Tzu</p>
What impact does the alleged violation(s) have on the public?
See complaint. The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency’s failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.
List of attached evidence or contact information where evidence may be found
See complaint and also PDC website.
List of potential witnesses with contact information to reach them
See complaint and also PDC website.

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



Jane Fonda Climate PAC 2024

- Overview
- Contributions
- Expenditures
- Pledges
- Debts
- Loans

Committee Overview

Registered November 4, 2024
Continuing Committee
Treasurer is Jay Halfon

Committee Contact

600 Pennsylvania Ave SE #15180
Washington, DC 20003
jfcpcapcompliance.com
2025446960

Financial Overview

\$0.00	+	\$2,555.00	+	\$0.00	=	\$2,555.00
Starting balance		Contributions		Loans		Total raised
\$928.12				\$0.00		\$0.00
Total spent				Pledges		Debt

Committee Reports and Forms

- Registration Form
- Contributors and Vendors Map

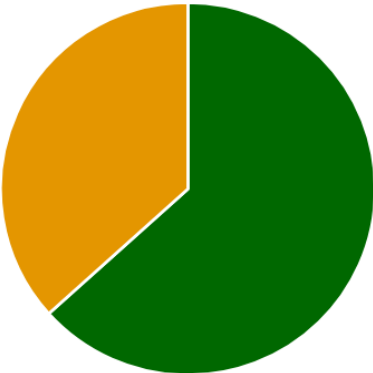
Made to committee for 2024
Contributions

See who has contributed cash and in-kind (non-monetary) contributions to the committee..

Contributions made to committee for 2024

Individual
\$1,618.00

Other
\$937.00



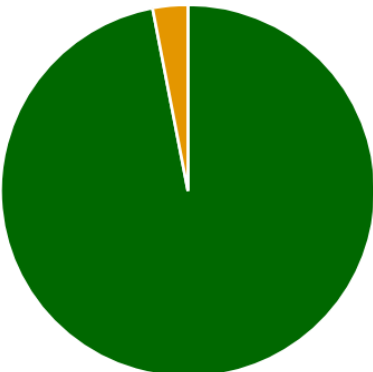
Made by committee for 2024
Expenditures

See how the committee has spent money, and what kind of goods and services it received as in-kind contributions.

Expenditures made by candidate for 2024

Monetary contributions to PAC...
\$900.00

Not Provided
\$28.12



Made to committee
Loans

See loans received, forgiven or paid by the campaign.

\$0.00

Held by committee

Debts

See the campaign's debt reporting history.

\$0.00

Campaign Finance Reports

See the reports filed by the committee. Reports with a strikethrough were amended by another report.

Show

25

 entries

Download 4 rows as CSV.

Period	Report Number	Filed	Report	Form Type	Election Year
10/20/2024 - 10/28/2024	110258774	11/04/2024	View Report	C4	2024
10/20/2024 - 10/20/2024	110258724	11/04/2024	View Report	C3	2024
10/23/2024 - 10/23/2024	110258725	11/04/2024	View Report	C3	2024
10/29/2024 - 10/29/2024	110258726	11/04/2024	View Report	C3	2024

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Support Melissa Demyan for Washington LD-45

Not all Democrats are the same. Case in point: **Melissa Demyan**, a climate champion and union organizer is running for the WA State House against a well-funded corporate Democrat, Larry Springer. Larry has taken tens of thousands in donations from Big Oil and corporate interests, and even voted against unemployment benefits for striking workers.

Melissa will tackle the climate crisis head-on by strengthening emissions standards and investing in green infrastructure. We don't need yet another elected official in the pocket of Big Oil, we need leaders like Melissa who will always put working families first.

Make a contribution below to support Melissa's campaign!

Choose an amount:

Your contribution will benefit Melissa Demyan.

\$25

\$100

\$250

\$1,000

\$

Make it monthly!

Yes, count me in!

✓ No, donate once

Checkout

 Have an ActBlue Express account? [Sign in to give faster.](#)



Pay with card

Or

**Contribution rules**

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).



Contributions

Search contributions to all candidates and political committees since 2007. Campaigns are required to itemize any contribution that in aggregate exceed the itemization threshold. Those reported as "in-kind" represent the contribution of goods and services.

Results for:

Contributor: Jane Fonda Climate PAC ✕

^ Hide Filters Search Tips

Contributor

Jane Fonda Climate PAC

X

Candidate/Committee Name

Enter text

X

Election Year

Select

X

Campaign Type

Select

X

City

Enter text

X

State

Select

X

Employer

Enter text

X

Occupation

Enter text

X

Amount

From

To

X

Contribution Date

X

From

To

Cash or In-Kind

SelectX

Primary or General

SelectX

Show50▼entries

Download 5 rows as CSV.

Contributor	Candidate/Committee	Election Year	Campaign Type	City	State	Employer	Occupation	Amount
Jane Fonda + Climate PAC	Dave Upthegrove	2024	Candidate	Washington	DC			\$28.12
Jane Fonda + Climate PAC	Melissa Demyan	2024	Candidate	Washington	DC			\$900.00
Jane Fonda + Climate PAC	Melissa Demyan	2024	Candidate	Washington	DC			\$168.64
Jane Fonda + Climate PAC	No on 2117	2024	Political Committee	Washington	DC			\$10,000.00
Jane Fonda + Climate PAC	No on 2117	2024	Political Committee	Washington	DC			\$35.16

Showing 1 to 5 of 5 entries (filtered from 6,483,014 total entries)

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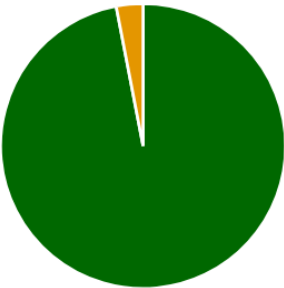
Itemized Expenditures

\$928.12

Shown below are the campaign’s expenditures. Small expenses may be grouped together and reported as one sum. Donated goods and services (known as in-kind contributions) also appear here as expenditures, with the contributor listed in the recipient column.

Expenditures by Expense Type

- Monetary contributions to PAC...
\$900.00
- Not Provided
\$28.12



Results for:

No selected filters.

Hide Filters Search Tips

Recipient Name

Enter text

X

Description

Enter text

X

Date

From

To

X

Recipient City

Enter text

X

Recipient State

Select

X

Amount

From

To

X

Show 50 entries

[Download 2 rows as CSV.](#)

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
EXPENSES OF \$200.00 OR LESS	10/20/2024				\$28.12	View Report
Friends of Melissa Demyan	10/23/2024	Monetary contributions to PAC or candidate	SeaTac	WA	\$900.00	View Report

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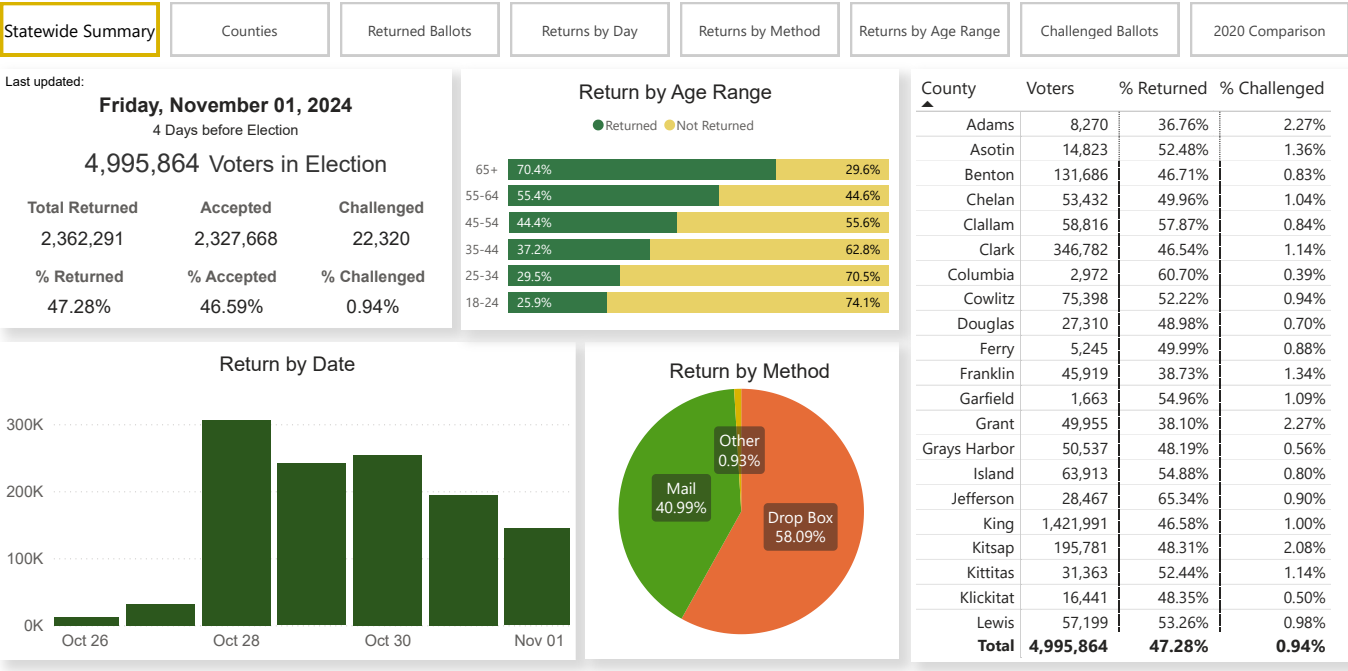
Ballot Return Statistics

Ballot return statistics are posted after 5 p.m. each business day, beginning two weeks prior to Election Day and continuing until the election is certified.

For a complete ballot status report, see our [ballot status reports page](#). To check your own ballot status, visit [VoteWA.gov](#). For questions about the data, contact elections@sos.wa.gov.

Please allow a few moments for the report to load.

2024 General Election - Ballot Return Statistics



Looking for data from past elections? Visit our [election data and statistics page](#).

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Washington Secretary of State

Elections Division

PO Box 40229

Olympia, WA 98504-0229

elections@sos.wa.gov

1 (800) 448-4881



Complaint Against: Jane Fonda Climate PAC & Jane Fonda

Submitted: 11/5/24

Notice to Respondent Due By: 11/15/24 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 2/3/25 per RCW 42.17A.755(3)

Statutes Violated: RCW 42.17A.205, .235, .240, .270, see WAC 390-16-207(5)

Background

Washington State's Campaign Finance Disclosure Law

One of the primary purposes of the public disclosure law is to provide citizens of this state, and especially voters, with the means for becoming informed about the financing of political campaigns.¹ The public disclosure law was enacted through voter approval of Initiative 276 in 1972.

State law requires candidates and committees that register under full reporting to submit regular reports of financial activity. Those reports are filed on schedules outlined on the PDC's key reporting dates calendar.²

Violations

Failure to file timely/accurate C3 & C4 reports.

This committee was required to begin filing C3/C4 reports on October 16, 2024, if not earlier. This committee failed to file two C3 reports on time (110258724 & 110258725). Additionally, the committee failed to timely file the required 7-day C4 report, see link:

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110258774>

Additionally, although the recipient committee (No on 2117) reported receiving a \$10,000 contribution from the respondent (<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110254814>) the respondent has not reported making this donation. See attached.

Additionally, the committee was obligated under WAC 390-16-207(5) to disclose the in-kind contributions it made to other candidates and committees. Despite this requirement, the committee failed to disclose a \$168.64 in-kind contribution it made to the Friends of Melissa Demyan committee, see link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110257138>.

The committee failed to file a single report until November 4, 2024, after 47.28% of ballots had already been cast. See attached.

Failure to timely/accurately file C1pc registration report.

This committee also failed to timely register. RCW 42.17A.205 requires that when a committee organizes within the 3 weeks prior to the election that it must register within 3 business days. The committee failed to do so. The first reported contribution from the committee occurred on

¹ <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics>

² <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics/key-dates-2024>

10/16/24, for \$10,000 see link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110254814>. Despite this, the committee was not registered until 11/4/24, see link: https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=61838. This makes the committee's registration significantly late. The committee did not register until literally the day before the election.

Additionally, the committee has failed to indicate that it is supporting the candidacies of Melissa Demyan and Dave Upthegrove, as required by RCW 42.17A.205(2)(f).

Additionally, the committee is required to disclose the names and addresses of individuals who make decisions on the committee's behalf. Despite this requirement, neither Jane Fonda nor Annie Leonard have been disclosed on the registration as officers authorized to make decisions on behalf of the committee.

OUR TEAM

Jane Fonda, Principal

Jane Fonda has famously dedicated her life to activism, most recently mobilizing thousands of people to take action on climate through Fire Drill Fridays, a set of weekly climate demonstrations on Capitol Hill. Her book, *What Can I Do? My Path from Climate Despair to Action*, equips activists with the tools needed to engage and take action on climate change.

Annie Leonard, Former Executive Director of Greenpeace USA and creator of The Story of Stuff (organizations listed for identification purposes only).

Annie Leonard is an experienced and prominent climate change leader in the United States. She has a track record of over 30 years of activism and is the former Executive Director of Greenpeace US where she led a team to inspire and mobilize millions of people to take action to create a more sustainable and just future together. Note: Jane's Climate PAC is independent from Greenpeace and the collaboration it runs with Jane, Fire Drill Fridays.

See link:

<https://janepac.com/?home#about>.

Failure to file earmarked reports.

Contributors may give funds to candidates, political parties or other committees for spending on behalf of one or more other candidates or committees. These types of donations are known as earmarked contributions. Earmarked contributions may not simply be passed along to the benefiting candidate or committee; they must be spent—at least for the most part—for the benefit of the intended recipient.

Intermediaries or conduits must report earmarked contributions as follows: complete Special Report E and mail the original version of the report to PDC and a copy to the beneficiary within two business days of receiving the earmarked contribution. Then, the conduit must notify the

beneficiary of the actual amount spent as soon as it is practicable, hopefully no later than the end of month in which the election is held.

It appears that the committee is not doing this. The committee has not filed a Special Report E (and in fact it appears that no committee has filed a Special Report E in nearly 4 years).

On the committee's main page (<https://janepac.com/?home#about>), it has a list of the candidates being supported by the committee. There were only two WA-state candidates being supported by the committee.



**DAVID UPTHEGROVE, WASHINGTON
COMMISSIONER OF PUBLIC LANDS**

DONATE

Currently a King County Councilor and former state legislator, David has a strong climate background, having chaired the Environment Committee and sponsored key climate legislation. He is endorsed by prominent environmental groups and political leaders. His platform includes protecting legacy forests, advancing clean energy projects, and improving wildfire resilience, all while centering environmental justice and honoring treaty rights.



MELISSA DEMYAN, WA LD-45

DONATE

Melissa Demyan, a climate champion and union organizer is running for the WA State House against a well-funded corporate Democrat, Larry Springer. Larry has taken tens of thousands in donations from Big Oil and corporate interests, and even voted against unemployment benefits for striking workers.

Melissa will tackle the climate crisis head-on by strengthening emissions standards and investing in green infrastructure. We don't need yet another elected official in the pocket of Big Oil, we need leaders like Melissa who will always put working families first.

When you click on the donate button for the David Upthegrove campaign, it takes you to his normal candidate donation page, see link: <https://secure.actblue.com/donate/electupthegrove>. Obviously, donations made via the candidate's own portal would not constitute an earmarked contribution.

However, when you click on the donate button for the Melissa Demyan campaign, it takes you to a special landing page that appears to be not connected to the Demyan campaign, see link: <https://secure.actblue.com/donate/jfcp-website-melissa-demyan>. See also attached. Based on the verbiage of the page, it appears the contributions made to the respondent via this page are earmarked for the benefit of Melissa Demyan but these contributions are not being reported properly since no Special Form E has been filed.

Conclusion

With only mere hours remaining before the 2024 general election is concluded, I urge the PDC staff to leap into action and resolve the noncompliance identified in this complaint.

Best,

Electronically signed Conner Edwards

/s/ Conner Edwards

Complainant

Notice to Respondent

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This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.

What are these shortcomings?

Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.

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“The journey of a thousand miles begins with a single step.”
— Lao Tzu