



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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March 10, 2025

Delivered electronically to mitrani@sandlerreiff.com

Subject: PDC Case 164739 regarding Jane Fonda Climate PAC

Jane Fonda Climate PAC:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on Nov. 5, 2024. The complaint alleged violations of RCW 42.17A.235 and .240 for failure to timely report contributions and expenditures.

Applicable Laws and Rules

- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions.
- RCW 42.17A.240 requires committees file accurate campaign finance reports with the Public Disclosure Commission.
- RCW 42.17A.250 describes the filing requirements for an out-of-state political committee organized for the purpose of supporting or opposing candidates or ballot propositions in another state that is not otherwise required to report under RCW 42.17A.205 through 42.17A.240.

Background and Findings

- In response to the complaint, David Mitrani, Counsel to Jane Fonda Climate PAC, stated the Jane Fonda Climate PAC has been registered with the Federal Election Commission since 2022.
- On October 20, 2024, JanePAC sent out a fundraising solicitation email that specifically mentioned Washington ballot measure Initiative 2117.
- The same day, Aaron Barden contacted PDC staff to seek guidance on if an out-of-state committee needs to register with the PDC as an in-state committee if it makes a solicitation referencing a Washington state ballot measure.
- PDC staff first told Barden on Oct. 24, 2024, the out-of-state committee could still report using the C-5, however PDC staff updated this guidance on Oct. 29, 2024, and informed Barden of the need to register and report as an in-state Political Committee.
- On Nov. 4, 2024, the committee Jane Fonda Climate PAC was registered with the PDC, with registration listing Jay Halfon as treasurer.
- Also on Nov. 4, 2024, Halfon filed three C-3 reports and one C-4 report.

- On Nov. 8, 2024, Jane Fonda Climate PAC timely filed an out-of-state committee report (C-5) with the PDC for October 2024. The report disclosed contributions to Dave Upthegrove, Melissa Deyman and No on 2117.
- Jane Fonda Climate PAC filed a C-4 report on Dec. 10, 2024, and Jan. 7, 2025.
- In total, Jane Fonda Climate PAC reported \$2,555 in contributions and \$986.24 in expenditures from its PDC-registered PAC.
- In response to the complaint, Mitrani stated “After October 20, 2024, JanePAC sought advice from PDC regarding its registration and reporting obligations and registered within three business days of PDC confirming that registration was required. For this reason, its October C-5 report covers the first period of October, up through October 20, 2024, and its remaining political committee reports cover the time since that date.”
- The complaint also alleged Jane Fonda Climate PAC failed to report earmarked contributions.
- In response, Mitrani noted the allegations of a special landing page was an ActBlue page and “as with all ActBlue contributions, the funds went to ActBlue as a payment processor and then were sent directly to Melissa Deyman’s campaign.”
- As of this writing, Jane Fonda Climate PAC was continuing to file as a continuing committee. The PAC should be aware that all expenses of the in-state PAC must be reported, not just Washington activity. This reporting continues until the committee is no longer an in-state committee.
- Mitrani communicated to PDC staff on March 7, 2025, that Jane Fonda Climate PAC intends to close its Washington in-state PAC.

Summary and Resolution

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

If you have questions, contact Alice Fiman at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s Electronically signed by Alice Fiman
 Alice Fiman
 Compliance Officer

Endorsed by,

/s Electronically signed by Kim Bradford
 Kim Bradford
 Deputy Director
 For Peter Frey Lavalley
 Executive Director

cc: Conner Edwards