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March 25, 2025

Washington State Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

Via Email Only

RE: Public Comment for March 27, 2025, Regular Commission Meeting concerning Enforcements actions brought by and against Let's Go Washington

Dear Chair Leach and Commissioners:

I am contacting you on behalf of Let's Go Washington (Sponsored by Brian Heywood) (LGW), a political committee registered in Washington State, regarding the status of and, in some cases, the outcomes of enforcement actions brought by and against LGW.

The Commission is of course very aware of LGW and of at least one complaint brought by the law firm Bernard Iglitzin on behalf of Seattle political operative Heather Weiner. And the Commission is very aware of the outcome of that case where, while LGW rebuffed nearly all the accusations made by the Complainant, the Commission still sanctioned LGW for insufficiently demonstrating an intent to seek subvendor information, though no such subvendors were eventually found.

Two other complaints were brought by the Benard Iglitzin firm, including Case No. 160530 alleging incorrect disclaimers on political advertising and Case No. 161496 alleging LGW knowingly accepted and attributed a contribution to a deceased person. Allegations in both cases were dismissed with no violations found.

The Commission may be aware of complaints made by LGW against some of its opponents. The cases and outcomes follow:

Case No. 159256 filed on September 11, 2024, against No on 2117
Issue: No black background behind disclaimer on more than $2 million worth of TV and video advertising.

Outcome: Staff found a violation but declined any sanction other than a warning to a single-year ballot measure committee.

Case No. 161612 filed on October 31, 2024, against No on 2124
Issue: Incorrect/Partial/Missing Top-5 Contributor info on more than $10 million in advertising.

Outcome: Staff found a violation but declined any sanction other than a warning to a single-year ballot measure committee.

Case No. 160448 filed on October 7, 2024, against Defend Washington
Issue: Missing subvendor disclosures and not disclosing expenditures by ballot measure.

Outcome: Despite Defend Washington's Treasurer admitting a violation, this case remains in "Assessment of Facts" status well beyond 90 days from the case being opened.

Case No. 160531 filed on October 7, 2024, against No on 2109
Issue: Missing subvendor disclosure.

Outcome: Despite No on 2109's Treasurer admitting a violation, this case remains in "Assessment of Facts" status well beyond 90 days from the case being opened.

Case No. 163094 filed on November 27, 2024, against Green Jobs PAC
Issue: Failure to timely file 7-day, pre-general C4 Report; Failure to disclose subvendors; Failure to identify expenditures by ballot measure:

Outcome: While more than 90 days have passed since this case was opened, PDC staff are now formally investigating this complaint. Green Jobs has already admitted that there is a violation.

Case No. 163092 filed on November 27, 2024, against SEIU Healthcare 1199 NW PAC
Issue: Failure to timely file 21-day and 7-day, pre-general C4 Reports; Failure to disclose subvendors; Failure to identify expenditures by ballot measure:

Outcome: While more than 90 days have passed since this case was opened, PDC staff are now formally investigating this complaint. SEIU Healthcare has admitted that the reports were filed late.

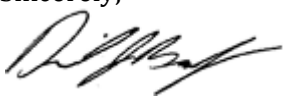
Summary

When considering the complaints made against LGW and the eventual outcomes of each case when compared to the complaints made by LGW listed here, some concerns arise regarding whether both LGW and its opponents are treated the same in the enforcement process. For instance, the Commission seemed to attach great significance to the potential of missing subvendor expenditures in the case of LGW, but PDC staff didn't find millions of dollars of advertising by its opponents with out-of-compliance disclaimers in political advertising to be a significant issue and dismissed those complaints.

LGW realizes that some of these cases are still open and will continue to monitor the enforcement process. As these cases are resolved, LGW and the public will be looking at the outcomes for any precedents set and patterns that emerge. LGW is requesting the Commission use its enforcement powers to ensure that a strong incentive exists for political committees to fully comply with RCW 42.17A and WAC 390 and that it perhaps reconsider Case No. 159256 and Case No. 161612.

Thank you for your attention to these matters.

Sincerely,



Dan Brady
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CC: Peter Frey Lavallee, Executive Director
Kim Bradford, Deputy Executive Director