

22 September 2025

RE: Joe A. Kunzler Written Public Comments for 25 September 2025 PDC Meeting

Dear Public Disclosure Commission;

Joe Kunzler here, frequent commenter and sometimes complainant. I'm going to cut to the chase: The RCW 42.17A.555 enforcement is broken.

Broken? But there are complaints – some of which I file – and then there are responses. The responses sometimes lead to positive changes, sometimes lead to perpetuating a broken status quo where Avrum (Alex) Tsimmerman can use public comment periods to campaign and malign candidates in good standing.

Example being in the case of Bellevue, which also required a page from me the complaint went past the WAC 390-37-050 deadline. A case dismissed on the basis that Bellevue did make “significant efforts” to stop Avrum (Alex) Tsimmerman's campaigning but did not define what “significant” is.

We have city attorneys who right now are urging inaction and inadequate action against Tsimmerman's continued abuses – especially as Tsimmerman keeps coming to Bellevue City Hall public meetings with his sign against a candidate for office. I have shared before that the PDC needs to engage in rulemaking for clarity. Because clogging the PDC with complaints is one solution, and that solution means that all campaign finance regulation is delayed. As I'm sure the PDC staff is familiar with the saying, justice delayed... is justice denied.

We in the complainant community need clear guidance as to what is “significant efforts” with RCW 42.17A.555, so we do not overburden the PDC. Nobody wants to play whack-a-mole here, everybody wants a clear-cut code enforcement plan.

We also need the PDC to prioritize new laws in the 2026 Legislative Session, changing the onus at least in repeat circumstances to those political actors and actresses who repeatedly attempt to obtain public resources – such as public comment periods – for their campaigns. Coupled to criminal penalties, not just civil, because as we all know, the PDC has significant difficulty collecting on the civil side.

In closing, I request again please clarity and some changes as to the enforcement of RCW 42.17A.555. Just as the PDC has slowly changed its ways after years of being flooded with complaints over nonreporting by candidates, the PDC and the State Legislature in the 2026 legislative season must change how RCW 42.17A.555 is enforced.

Thank you for your continued public service;

A handwritten signature in black ink that reads "Joe A. Kunzler". The signature is fluid and cursive, with the first name "Joe" being the most prominent part.

Joe A. Kunzler
growlernoise@gmail.com