



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

November 21, 2022

Delivered electronically to brady@wsrp.org

Subject: Complaint filed by M. Sue Lockett-John, PDC Case #####

Dear WA State Republican Party:

Below is a copy of an electronic letter sent to M. Sue Lockett-John concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to M. Sue Lockett-John, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding WA State Republican Party to be cautious regarding the use of organizations' logos without permission, as such use could imply endorsement in some contexts.

If you have questions, you may contact Tabitha Townsend at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically Signed by Tabitha Townsend

Tabitha Townsend
Compliance Coordinator 2

Endorsed by,

Electronically Signed by Kim Bradford

Kim Bradford
Deputy Director
For Peter Lavallee
Executive Director



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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcca.wa.gov

November 21, 2022

Delivered electronically to suej@ghpfish.org

Subject: Complaint regarding WA State Republican Party, PDC Case #####

Dear M. Sue Lockett-John:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 11, 2022. The complaint alleged that WA State Republican Party may have violated RCW 42.17A.335's prohibition against making a false claim of endorsement when it used a photo showing the new GHP FISH Food Bank as well as the logo of GHP FISH Food Bank in political advertising supporting candidate Spencer Hutchins in the 2022 election for State Representative of Leg District 26 - House.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules and other relevant information to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- The political advertising regarding Hutchins' involvement in the project to build the new GHP FISH facility included a photo of Hutchins standing outside in front of the facility. The text near the photo contained information about Hutchins' involvement with the food bank's relocation.
- In a separate box, the mailer provided various statistics about the Gig Harbor Peninsula FISH Food Bank's service levels. That information was displayed with the FISH logo.
- Nowhere in the political advertising does it explicitly state that the GHP FISH Food Bank organization endorsed the candidate, Spencer Hutchins.
- PDC staff also found that the mailer did not constitute an implied endorsement. The photo was taken in an area accessible to the public and the logo was placed below a set of facts about the food bank's community services.

Based on our findings, staff has determined that, in this instance, use of the photo or logo for the FISH food bank does not amount to a violation that warrants further investigation.

PDC staff is reminding WA State Republican Party to be cautious regarding the use of organizations' logos without permission, as such use could imply endorsement in some contexts.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabitha Townsend at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Electronically Signed by Tabitha Townsend

Tabitha Townsend
Compliance Coordinator 2

Endorsed by,

Electronically Signed by Kim Bradford

Kim Bradford
Deputy Director
For Peter Lavalley
Executive Director

cc: WA State Republican Party