



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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**BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON**

In RE COMPLIANCE WITH
RCW 42.17 and RCW 42.17A

Washington State Republican Party
(Non-Exempt & Exempt Accounts)

Respondent.

PDC Case 146593

Report of Investigation

Background, Complaint and Allegation

- 1.1 The Washington state Republican Party (WSRP) is a Bona Fide State Party Committee with an Exempt and Non-Exempt account both registered with the Public Disclosure Commission (PDC).
- 1.2 On June 16, 2023, WSRP filed a Committee Registration (C-1pc report) for the Non-Exempt account, selecting the Full Reporting option and listing Caleb Heimlich as Chairman and Amanda St. George as Interim Treasurer. On that same date, WSRP filed a C-1pc report for the Exempt account, selecting the Full Reporting option and listing Caleb Heimlich as Chairman and Amanda St. George as Interim Treasurer.
- 1.3 Both C-1pc reports were amended twice. First, on September 11, 2023, the reports were amended to disclose Jim Walsh as Chairman and Conner Edwards as Treasurer. They were amended again on November 13, 2023, disclosing Braden Batt as Treasurer.
- 1.4 Miriam Juritz and Han Tran appeared on the November 7, 2023, general election ballot for Northshore School District 417, Position 3. Han Tran won the seat with 54.11% of the votes.
- 1.5 On October 27, 2023, PDC staff received a complaint from Stacey Valenzuela alleging that an unknown person sent a text message opposing Han Tran, a 2023 Northshore School District director candidate. This text message did not include the required sponsor identification. **[Exhibit 1]**

- 1.6 In order to identify the sponsor of the text message, on December 4, 2023, PDC staff issued a subpoena to Onvoy, LLC d/b/a Inteliquent, whom staff believed was the owner of the telephone number(s) used to send the text messages. **[Exhibit 7]** In response to the subpoena, staff was given Inteliquent's customer name, SignalWire, Inc. **[Exhibit 8]**
- 1.7 On December 19, 2023, staff sent a commercial advertiser request pursuant to RCW 42.17A.345 to SignalWire, Inc. In response to the request, SignalWire asserted it was not an advertiser but provided the vendor used to send the text message, Prompt.io Inc. **[Exhibit 9]**
- 1.8 On December 26, 2023, staff sent a commercial advertising request to Prompt.io requesting information regarding the purchaser and costs connected to the October 26, 2023, text message campaign. **[Exhibit 10]**
- 1.9 On December 29, 2023, staff received a response from vendor Prompt.io, identifying the sponsor as the WSRP, with a payment amount of \$159.22 for 3,175 texts. **[Exhibit 11]**
- 1.10 Prior to identifying WSRP as the sponsor of the political advertisement, staff received an additional complaint from Stacey Valenzuela on October 27, 2023 **[Exhibit 1]**, and a complaint from Heidi Schauble on November 7, 2023 **[Exhibit 2]**, alleging a violation of RCW 42.17A.320 for failure to include sponsor identification on the October 26, 2023, text message.
- 1.11 Staff received two complaints from Jacki Bricker and Ron Critchfield both on February 1, 2024 **[Exhibit 3]**, alleging a violation of RCW 42.17A.320 for failure to include sponsor identification on the October 26, 2023, text message.
- 1.12 On January 29, 2024, the PDC conducted an Initial Hearing (Case Status Review) and opened a formal investigation against WSRP.
- 1.13 During the investigation of PDC Case Number 140213, staff identified a \$100,000 monetary contribution received by Let's Go Washington on December 12, 2023, from the Washington State Republican Party Exempt account.

II.

Investigative Findings

Allegation #1: Alleged failure to include sponsor identification political advertisement

2.1 PDC staff sent notice of the complaints from Stacey Valenzuela and Heidi Schauble to WSRP on January 3, 2024, and requested a response by January 16, 2024.

2.2 In his response, WSRP Executive Director Braden Batt acknowledged that WSRP failed to provide sponsor ID on the text message, stating that it was still in the draft status of their regular review process when it was accidentally queued up with other, much larger SMS projects being sent at the same time. Mr. Batt stated that the value of the text messaging lacking sponsor ID was \$150. **[Exhibit 4]**

Allegation #2: Alleged failure to timely and accurately disclose expenditures for text messaging campaign

2.3 On January 16, 2024, after being unable to locate it, staff requested confirmation that the \$159.22 expenditure made to Prompt.io for the October 26, 2023, text messaging campaign had been reported by WSRP.

2.4 On January 26, 2024, WSRP Non-Exempt amended its Summary Full Campaign Contribution and Expenditure report (C-4 report) covering October 17 – 30, 2023, to add an October 26, 2023, debt owed for \$159.22 to Prompt.io Inc., with the description “GOTV text messages – Myriam Juritz Northshore School Dis. Dir. Pos. 3.” **[Exhibit 5]** The payment to Prompt.io was disclosed after the November 7, 2023, general election and 92 days after the text message was sent.

2.5 On February 16, 2024, staff requested confirmation that the \$159.22 entry had been reported correctly as a debt. On February 26, 2024, Mr. Batt confirmed the \$159.22 was still a debt as Prompt.io had not yet cashed the check. **[Exhibit 12]**

Allegation #3: Alleged prohibited exempt funds contribution to a ballot measure committee

2.6 On January 10, 2024, WSRP Exempt submitted a C-4 report covering activity for December 2023 and disclosed a \$100,000 monetary contribution to Let’s Go Washington, a ballot measure committee registered with the PDC to support six statewide initiatives. **[Exhibit 6]**

2.7 On May 23, 2024, PDC staff requested confirmation that the expenditure was accurate and WSRP had used exempt funds to make the contribution to Let’s Go Washington.

2.8 Mr. Batt responded on May 31, 2024, confirming that the \$100,000 contribution was made using exempt funds stating it has been a well-established practice of the State Party to write

cash contributions out of the exempt account to non-candidate Political Committees/PACs.
[Exhibit 13]

III. **Scope**

3.1 PDC staff reviewed the following:

- Five complaints filed against WSRP as follows: (1) Two complaints filed by Stacey Valenzuela on October 27, 2023; (2) Heidi Schauble's complaint filed on November 7, 2023; (3) Jacki Bricker's complaint filed on February 1, 2024; and (4) Ron Critchfield's complaint filed on February 1, 2024.
- Results of queries of the PDC contribution and expenditure databases for WSRP Exempt and Non-Exempt accounts.
- The original and amended C-4 reports filed by WSRP Exempt and Non-Exempt accounts.

3.2 PDC staff sent or exchanged numerous emails with WSRP during the review and investigation of PDC Case 146593. Some of the email correspondence included:

- January 3, 2024: PDC staff sends an email to WSRP regarding the two October 27, 2023, complaints from Stacey Valenzuela and the November 7, 2023, complaint from Heidi Schauble and requested a response by January 16, 2024.
- January 16, 2024: PDC staff sends an email to WSRP requesting confirmation of payment to Prompt.io for text message campaign and requested a response by January 18, 2024.
- January 29, 2024: PDC staff conducts an Initial Hearing for WSRP for PDC Case 146593 and opens a formal investigation into the matter.
- February 6, 2024: PDC staff sends an email to WSRP regarding the February 1, 2024, complaint from Jacki Bricker and the February 1, 2024, complaint from Ron Critchfield.
- February 16, 2024: PDC staff sends an email to WSRP requesting confirmation that payment to Prompt.io for text messaging campaign was reported correctly as a debt still owed.
- March 26, 2024: PDC staff sends an email to WSRP requesting additional information regarding the other SMS project messaging (text messages) sent by WSRP and requested a response by April 2, 2024.
- April 4, 2024: PDC staff resends the email requesting additional information regarding the other SMS project messaging (text messages) sent by WSRP and requested a response by April 11, 2024. Staff also requested that the number of text messages sent on October 26, 2023, be added to the description disclosed on the C-4 report.
- April 12, 2024: PDC staff resends the email requesting additional information regarding the other SMS project messaging (text messages) sent by WSRP and requested a response by April 26, 2024. Staff also included the request that the number of text

messages sent on October 26, 2023, be added to the description disclosed on the C-4 report.

- May 23, 2024: PDC staff sends an email to WSRP requesting confirmation that exempt funds were used for the \$100,000 monetary contribution made to Let's Go Washington and requested a response by May 31, 2024.
- June 17, 2024: PDC staff sends an email to WSRP regarding staff's addition of a second allegation for failure to timely and accurately disclose costs for text message campaign and a third allegation for making a prohibited contribution to a ballot measure committee using exempt funds, and requests a response by July 2, 2024.

IV. **Statute and Rule**

RCW 42.17A.320 Identification of sponsor—Exemptions.

(1) All written political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name and address. All radio and television political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name. The use of an assumed name for the sponsor of electioneering communications, independent expenditures, or political advertising shall be unlawful. For partisan office, if a candidate has expressed a party or independent preference on the declaration of candidacy, that party or independent designation shall be clearly identified in electioneering communications, independent expenditures, or political advertising.

(2) In addition to the information required by subsection (1) of this section, except as specifically addressed in subsections (4) and (5) of this section, all political advertising undertaken as an independent expenditure or an electioneering communication by a person or entity other than a bona fide political party must include as part of the communication:

(a) The statement: "No candidate authorized this ad. It is paid for by (name, address, city, state)";

(b) If the sponsor is a political committee, the statement: "Top Five Contributors," followed by a listing of the names of the five persons making the largest contributions as determined by RCW [42.17A.350](#)(1); and if necessary, the statement "Top Three Donors to PAC Contributors," followed by a listing of the names of the three individuals or entities, other than political committees, making the largest aggregated contributions as determined by RCW [42.17A.350](#)(2); and

(c) If the sponsor is a political committee established, maintained, or controlled directly, or indirectly through the formation of one or more political committees, by an individual, corporation, union, association, or other entity, the full name of that individual or entity.

(3) The information required by subsections (1) and (2) of this section shall:

(a) Appear on the first page or fold of the written advertisement or communication in at least ten-point type, or in type at least ten percent of the largest size type used in a written advertisement or communication directed at more than one voter, such as a billboard or poster, whichever is larger;

(b) Not be subject to the half-tone or screening process; and

(c) Be set apart from any other printed matter. No text may be before, after, or immediately adjacent to the information required by subsections (1) and (2) of this section.

(4) In an independent expenditure or electioneering communication transmitted via television or other medium that includes a visual image, the following statement must either be clearly spoken, or appear in print and be visible for at least four seconds, appear in letters greater than four percent of the visual screen height on a solid black background on the entire bottom one-third of the television or visual display screen, or bottom one-fourth of the screen if the sponsor does not have or is otherwise not required to list its top five contributors, and have a reasonable color contrast with the background: "No candidate authorized this ad. Paid for by (name, city, state)." If the advertisement or communication is undertaken by a nonindividual other than a party organization, then the following notation must also be included: "Top Five Contributors" followed by a listing of the names of the five persons making the largest aggregate contributions as determined by RCW [42.17A.350](#)(1); and if necessary, the statement "Top Three Donors to PAC Contributors," followed by a listing of the names of the three individuals or entities other than political committees making the largest aggregate contributions to political committees as determined by RCW [42.17A.350](#)(2). Abbreviations may be used to describe contributing entities if the full name of the entity has been clearly spoken previously during the broadcast advertisement.

(5) The following statement shall be clearly spoken in an independent expenditure or electioneering communication transmitted by a method that does not include a visual image: "No candidate authorized this ad. Paid for by (name, city, state)." If the independent expenditure or electioneering communication is undertaken by a nonindividual other than a party organization, then the following statement must also be included: "Top Five Contributors" followed by a listing of the names of the five persons making the largest contributions as determined by RCW [42.17A.350](#)(1); and if necessary, the statement "Top Three Donors to PAC Contributors," followed by a listing of the names of the three individuals or entities, other than political committees, making the largest aggregate contributions to political committees as determined by RCW [42.17A.350](#)(2). Abbreviations may be used to describe contributing entities if the full name of the entity has been clearly spoken previously during the broadcast advertisement.

(6) Political advertising costing one thousand dollars or more supporting or opposing ballot measures sponsored by a political committee must include the information on the top five contributors and top three contributors, other than political committees, as required by RCW [42.17A.350](#). A series of political advertising sponsored by the same political committee, each of which is under one thousand dollars, must include the top five contributors and top three contributors, other than political committees, as required by RCW [42.17A.350](#) once their cumulative value reaches one thousand dollars or more.

(7) Political yard signs are exempt from the requirements of this section that the top five contributors and top three PAC contributors as required by RCW [42.17A.350](#) be listed on the advertising. In addition, the public disclosure commission shall, by rule, exempt from the identification requirements of this section forms of political advertising such as campaign buttons, balloons, pens, pencils, sky-writing, inscriptions, and other forms of advertising where identification is impractical.

(8) For the purposes of this section, "yard sign" means any outdoor sign with dimensions no greater than eight feet by four feet.

RCW 42.17A.235 Reporting of contributions and expenditures—Public inspection of accounts.

(1)(a) In addition to the information required under RCW [42.17A.205](#) and [42.17A.210](#), each candidate or political committee must file with the commission a report of all contributions received and expenditures made as a political committee on the next reporting date pursuant to the timeline established in this section.

(b) In addition to the information required under RCW [42.17A.207](#) and [42.17A.210](#), on the day an incidental committee files a statement of organization with the commission, each incidental committee must file with the commission a report of any election campaign expenditures under *RCW [42.17A.240](#)(6), as well as the source of the ten largest cumulative payments of ten thousand dollars or greater it received in the current calendar year from a single person, including any persons tied as the tenth largest source of payments it received, if any.

(2) Each treasurer of a candidate or political committee, or an incidental committee, required to file a statement of organization under this chapter, shall file with the commission a report, for each election in which a candidate, political committee, or incidental committee is participating, containing the information required by RCW [42.17A.240](#) at the following intervals:

(a) On the twenty-first day and the seventh day immediately preceding the date on which the election is held; and

(b) On the tenth day of the first full month after the election.

(3)(a) Each treasurer of a candidate or political committee shall file with the commission a report on the tenth day of each month during which the candidate or political committee is not participating in an election campaign, only if the committee has received a contribution or made an expenditure in the preceding calendar month and either the total contributions received or total expenditures made since the last such report exceed two hundred dollars.

(b) Each incidental committee shall file with the commission a report on the tenth day of each month during which the incidental committee is not otherwise required to report under this section only if the committee has:

(i) Received a payment that would change the information required under RCW [42.17A.240](#)(2)(d) as included in its last report; or

(ii) Made any election campaign expenditure reportable under *RCW [42.17A.240](#)(6) since its last report, and the total election campaign expenditures made since the last report exceed two hundred dollars.

(4) The report filed twenty-one days before the election shall report all contributions received and expenditures made as of the end of one business day before the date of the report. The report filed seven days before the election shall report all contributions received and expenditures made as of the end of one business day before the date of the report. Reports filed on the tenth day of the month shall report all contributions received and expenditures made from the closing date of the last report filed through the last day of the month preceding the date of the current report.

(5) For the period beginning the first day of the fourth month preceding the date of the special election, or for the period beginning the first day of the fifth month before the date of the general election, and ending on the date of that special or general election, each Monday the treasurer for a candidate or a political committee shall file with the commission a report of each bank deposit made during the previous seven calendar days. The report shall contain the name of each person contributing the funds and the amount contributed by each person. However, persons who contribute no more than twenty-five dollars in the aggregate are not required to be identified in the report. A copy of the report shall be retained by the treasurer for the treasurer's records. In the event of deposits made by candidates, political committee members, or paid staff other than the treasurer, the copy shall be immediately provided to the treasurer for the treasurer's records. Each report shall be certified as correct by the treasurer.

(6)(a) The treasurer for a candidate or a political committee shall maintain books of account accurately reflecting all contributions and expenditures on a current basis within five business days of receipt or expenditure. During the ten calendar days immediately preceding the date of the election the books of account shall be kept current within one business day. As specified in the political committee's statement of organization filed under RCW [42.17A.205](#), the books of account must be open for public inspection by appointment at a place agreed upon by both the treasurer and the requestor, for inspections between 9:00 a.m. and 5:00 p.m. on any day from the tenth calendar day immediately before the election through the day immediately before the election, other than Saturday, Sunday, or a legal holiday. It is a violation of this chapter for a candidate or political committee to refuse to allow and keep an appointment for an inspection to be conducted during these authorized times and days. The appointment must be allowed at an authorized time and day for such inspections that is within forty-eight hours of the time and day that is requested for the inspection. The treasurer may provide digital access or copies of the books of account in lieu of scheduling an appointment at a designated place for inspection. If the treasurer and requestor are unable to agree on a location and the treasurer has not provided digital access to the books of account, the default location for an appointment shall be a place of public accommodation selected by the treasurer within a reasonable distance from the treasurer's office.

(b) At the time of making the appointment, a person wishing to inspect the books of account must provide the treasurer the name and telephone number of the person wishing to inspect the books of account. The person inspecting the books of account must show photo identification before the inspection begins.

(c) A treasurer may refuse to show the books of account to any person who does not make an appointment or provide the required identification. The commission may issue limited rules to modify the requirements set forth in this section in consideration of other technology and best practices.

(7) Copies of all reports filed pursuant to this section shall be readily available for public inspection by appointment, pursuant to subsection (6) of this section.

(8) The treasurer or candidate shall preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred or for any longer period as otherwise required by law.

(9) All reports filed pursuant to subsection (1) or (2) of this section shall be certified as correct by the candidate and the treasurer.

(10) Where there is not a pending complaint concerning a report, it is not evidence of a violation of this section to submit an amended report within twenty-one days of filing an initial report if:

(a) The report is accurately amended;

(b) The amended report is filed more than thirty days before an election;

(c) The total aggregate dollar amount of the adjustment for the amended report is within three times the contribution limit per election or two hundred dollars, whichever is greater; and

(d) The committee reported all information that was available to it at the time of filing, or made a good faith effort to do so, or if a refund of a contribution or expenditure is being reported.

(11)(a) When there is no outstanding debt or obligation, the campaign fund is closed, the campaign is concluded in all respects, and the political committee has ceased to function and intends to dissolve, the treasurer shall file a final report. Upon submitting a final report, the political committee so intending to dissolve must file notice of intent to dissolve with the commission and the commission must post the notice on its website.

(b) Any political committee may dissolve sixty days after it files its notice to dissolve, only if:

(i) The political committee does not make any expenditures other than those related to the dissolution process or engage in any political activity or any other activities that generate additional reporting requirements under this chapter after filing such notice;

(ii) No complaint or court action under this chapter is pending against the political committee; and

(iii) All penalties assessed by the commission or court order have been paid by the political committee.

(c) The political committee must continue to report regularly as required under this chapter until all the conditions under (b) of this subsection are resolved.

(d) Upon dissolution, the commission must issue an acknowledgment of dissolution, the duties of the treasurer shall cease, and there shall be no further obligations under this chapter. Dissolution does not absolve the candidate or board of the committee from responsibility for any future

obligations resulting from the finding after dissolution of a violation committed prior to dissolution.

(12) The commission must adopt rules for the dissolution of incidental committees.

RCW 42.17A.240 Contents of report.

Each report required under RCW [42.17A.235](#) (1) through (4) must be certified as correct by the treasurer and the candidate and shall disclose the following, except an incidental committee only must disclose and certify as correct the information required under subsections (2)(d) and (7) of this section:

(1) The funds on hand at the beginning of the period;

(2) The name and address of each person who has made one or more contributions during the period, together with the money value and date of each contribution and the aggregate **value of** all contributions received from each person during the campaign, or in the case of a continuing political committee, the current calendar year, with the following exceptions:

(a) Pledges in the aggregate of less than one hundred dollars from any one person need not be reported;

(b) Income that results from a fund-raising activity conducted in accordance with RCW [42.17A.230](#) may be reported as one lump sum, with the exception of that portion received from persons whose names and addresses are required to be included in the report required by RCW [42.17A.230](#);

(c) Contributions of no more than twenty-five dollars in the aggregate from any one person during the election campaign may be reported as one lump sum if the treasurer maintains a separate and private list of the name, address, and amount of each such contributor;

(d) Payments received by an incidental committee from any one person need not be reported unless the person is one of the committee's ten largest sources of payments received, including any persons tied as the tenth largest source of payments received, during the current calendar year, and the value of the cumulative payments received from that person during the current calendar year is ten thousand dollars or greater. For payments to incidental committees from multiple persons received in aggregated form, any payment of more than ten thousand dollars from any single person must be reported, but the aggregated payment itself may not be reported. The commission may suspend or modify reporting requirements for payments received by an incidental committee in cases of manifestly unreasonable hardship under this chapter;

(e) Payments from private foundations organized under section 501(c)(3) of the internal revenue code to an incidental committee do not have to be reported if:

(i) The private foundation is contracting with the incidental committee for a specific purpose other than election campaign purposes;

- (ii) Use of the funds for election campaign purposes is explicitly prohibited by contract; and
- (iii) Funding from the private foundation represents less than twenty-five percent of the incidental committee's total budget;
- (f) Commentary or analysis on a ballot proposition by an incidental committee is not considered a contribution if it does not advocate specifically to vote for or against the ballot proposition; and
- (g) The money value of contributions of postage is the face value of the postage;
- (3) Each loan, promissory note, or security instrument to be used by or for the benefit of the candidate or political committee made by any person, including the names and addresses of the lender and each person liable directly, indirectly or contingently and the date and amount of each such loan, promissory note, or security instrument;
- (4) All other contributions not otherwise listed or exempted;
- (5) A statement that the candidate or political committee has received a certification from any partnership, association, corporation, organization, or other combination of persons making a contribution to the candidate or political committee that:
 - (a) The contribution is not financed in any part by a foreign national; and
 - (b) Foreign nationals are not involved in making decisions regarding the contribution in any way;
- (6) The name and address of each candidate or political committee to which any transfer of funds was made, including the amounts and dates of the transfers;
- (7) The name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure, and the total sum of all expenditures. An incidental committee only must report on expenditures, made and reportable as contributions as defined in RCW [42.17A.005](#), to election campaigns. For purposes of this subsection, commentary or analysis on a ballot proposition by an incidental committee is not considered an expenditure if it does not advocate specifically to vote for or against the ballot proposition;
- (8) The name, address, and electronic contact information of each person to whom an expenditure was made for soliciting or procuring signatures on an initiative or referendum petition, the amount of the compensation to each person, and the total expenditures made for this purpose. Such expenditures shall be reported under this subsection in addition to what is required to be reported under subsection (7) of this section;
- (9)(a) The name and address of any person and the amount owed for any debt with a value of more than seven hundred fifty dollars that has not been paid for any invoices submitted, goods received, or services performed, within five business days during the period within thirty days before an election, or within ten business days during any other period.
- (b) For purposes of this subsection, debt does not include regularly recurring expenditures of the same amount that have already been reported at least once and that are not late or outstanding;
- (10) The surplus or deficit of contributions over expenditures;
- (11) The disposition made in accordance with RCW [42.17A.430](#) of any surplus funds; and

(12) Any other information required by the commission by rule in conformance with the policies and purposes of this chapter.

RCW 42.17A.405 Limits specified—Exemptions.

(1) The contribution limits in this section apply to:

- (a) Candidates for legislative office;
- (b) Candidates for state office other than legislative office;
- (c) Candidates for county office;
- (d) Candidates for port district office;
- (e) Candidates for city council office;
- (f) Candidates for mayoral office;
- (g) Candidates for school board office;
- (h) Candidates for public hospital district board of commissioners in districts with a population over one hundred fifty thousand;
- (i) Persons holding an office in (a) through (h) of this subsection against whom recall charges have been filed or to a political committee having the expectation of making expenditures in support of the recall of a person holding the office;
- (j) Caucus political committees;
- (k) Bona fide political parties.

(2) No person, other than a bona fide political party or a caucus political committee, may make contributions to a candidate for a legislative office, county office, city council office, mayoral office, school board office, or public hospital district board of commissioners that in the aggregate exceed *eight hundred dollars or to a candidate for a public office in a port district or a state office other than a legislative office that in the aggregate exceed *one thousand six hundred dollars for each election in which the candidate is on the ballot or appears as a write-in candidate. Contributions to candidates subject to the limits in this section made with respect to a primary may not be made after the date of the primary. However, contributions to a candidate or a candidate's authorized committee may be made with respect to a primary until thirty days after the primary, subject to the following limitations: (a) The candidate lost the primary; (b) the candidate's authorized committee has insufficient funds to pay debts outstanding as of the date of the primary; and (c) the contributions may only be raised and spent to satisfy the outstanding debt. Contributions to candidates subject to the limits in this section made with respect to a general election may not be made after the final day of the applicable election cycle.

(3) No person, other than a bona fide political party or a caucus political committee, may make contributions to a state official, a county official, a city official, a school board member, a public hospital district commissioner, or a public official in a port district against whom recall charges have been filed, or to a political committee having the expectation of making expenditures in

support of the recall of the state official, county official, city official, school board member, public hospital district commissioner, or public official in a port district during a recall campaign that in the aggregate exceed *eight hundred dollars if for a legislative office, county office, school board office, public hospital district office, or city office, or *one thousand six hundred dollars if for a port district office or a state office other than a legislative office.

(4)(a) Notwithstanding subsection (2) of this section, no bona fide political party or caucus political committee may make contributions to a candidate during an election cycle that in the aggregate exceed (i) eighty cents multiplied by the number of eligible registered voters in the jurisdiction from which the candidate is elected if the contributor is a caucus political committee or the governing body of a state organization, or (ii) forty cents multiplied by the number of registered voters in the jurisdiction from which the candidate is elected if the contributor is a county central committee or a legislative district committee.

(b) No candidate may accept contributions from a county central committee or a legislative district committee during an election cycle that when combined with contributions from other county central committees or legislative district committees would in the aggregate exceed forty cents times the number of registered voters in the jurisdiction from which the candidate is elected.

(5)(a) Notwithstanding subsection (3) of this section, no bona fide political party or caucus political committee may make contributions to a state official, county official, city official, school board member, public hospital district commissioner, or a public official in a port district against whom recall charges have been filed, or to a political committee having the expectation of making expenditures in support of the state official, county official, city official, school board member, public hospital district commissioner, or a public official in a port district during a recall campaign that in the aggregate exceed (i) eighty cents multiplied by the number of eligible registered voters in the jurisdiction entitled to recall the state official if the contributor is a caucus political committee or the governing body of a state organization, or (ii) forty cents multiplied by the number of registered voters in the jurisdiction from which the candidate is elected if the contributor is a county central committee or a legislative district committee.

(b) No official holding an office specified in subsection (1) of this section against whom recall charges have been filed, no authorized committee of the official, and no political committee having the expectation of making expenditures in support of the recall of the official may accept contributions from a county central committee or a legislative district committee during an election cycle that when combined with contributions from other county central committees or legislative district committees would in the aggregate exceed forty cents multiplied by the number of registered voters in the jurisdiction from which the candidate is elected.

(6) For purposes of determining contribution limits under subsections (4) and (5) of this section, the number of eligible registered voters in a jurisdiction is the number at the time of the most recent general election in the jurisdiction.

(7) Notwithstanding subsections (2) through (5) of this section, no person other than an individual, bona fide political party, or caucus political committee may make contributions reportable under this chapter to a caucus political committee that in the aggregate exceed *eight hundred dollars in a calendar year or to a bona fide political party that in the aggregate exceed

*four thousand dollars in a calendar year. This subsection does not apply to loans made in the ordinary course of business.

(8) For the purposes of RCW [42.17A.125](#), [42.17A.405](#) through [42.17A.415](#), [42.17A.450](#) through [42.17A.495](#), [42.17A.500](#), [42.17A.560](#), and [42.17A.565](#), a contribution to the authorized political committee of a candidate or of an official specified in subsection (1) of this section against whom recall charges have been filed is considered to be a contribution to the candidate or official.

(9) A contribution received within the twelve-month period after a recall election concerning an office specified in subsection (1) of this section is considered to be a contribution during that recall campaign if the contribution is used to pay a debt or obligation incurred to influence the outcome of that recall campaign.

(10) The contributions allowed by subsection (3) of this section are in addition to those allowed by subsection (2) of this section, and the contributions allowed by subsection (5) of this section are in addition to those allowed by subsection (4) of this section.

(11) RCW [42.17A.125](#), [42.17A.405](#) through [42.17A.415](#), [42.17A.450](#) through [42.17A.495](#), [42.17A.500](#), [42.17A.560](#), and [42.17A.565](#) apply to a special election conducted to fill a vacancy in an office specified in subsection (1) of this section. However, the contributions made to a candidate or received by a candidate for a primary or special election conducted to fill such a vacancy shall not be counted toward any of the limitations that apply to the candidate or to contributions made to the candidate for any other primary or election.

(12) Notwithstanding the other subsections of this section, no corporation or business entity not doing business in Washington state, no labor union with fewer than ten members who reside in Washington state, and no political committee that has not received contributions of *ten dollars or more from at least ten persons registered to vote in Washington state during the preceding one hundred eighty days may make contributions reportable under this chapter to a state office candidate, to a state official against whom recall charges have been filed, or to a political committee having the expectation of making expenditures in support of the recall of the official. This subsection does not apply to loans made in the ordinary course of business.

(13) Notwithstanding the other subsections of this section, no county central committee or legislative district committee may make contributions reportable under this chapter to a candidate specified in subsection (1) of this section, or an official specified in subsection (1) of this section against whom recall charges have been filed, or political committee having the expectation of making expenditures in support of the recall of an official specified in subsection (1) of this section if the county central committee or legislative district committee is outside of the jurisdiction entitled to elect the candidate or recall the official.

(14) No person may accept contributions that exceed the contribution limitations provided in this section.

(15) The following contributions are exempt from the contribution limits of this section:

(a) An expenditure or contribution earmarked for voter registration, for absentee ballot information, for precinct caucuses, for get-out-the-vote campaigns, for precinct judges or

inspectors, for sample ballots, or for ballot counting, all without promotion of or political advertising for individual candidates;

(b) An expenditure by a political committee for its own internal organization or fund-raising without direct association with individual candidates; or

(c) An expenditure or contribution for independent expenditures as defined in RCW [42.17A.005](#) or electioneering communications as defined in RCW [42.17A.005](#).

WAC 390-17-060 Exempt contributions and activities—Definitions, reporting.

(1)(a) "Exempt contributions" are contributions made to a political committee which are earmarked for exempt activities as described in RCW [42.17A.405](#). Such contributions are required to be reported under RCW [42.17A.240](#), are subject to the restrictions in RCW [42.17A.420](#), but are not subject to the contribution limits in RCW [42.17A.405](#). Any written solicitation for exempt contributions must be so designated. Suggested designations are "not for individual candidates" or "for exempt activities."

(b) Contributions made to a caucus political committee, to a candidate or candidate's authorized committee which are earmarked for voter registration, absentee ballot information, get-out-the-vote campaigns, or sample ballots are presumed to be for the purpose of promoting individual candidates and therefore not exempt contributions and are subject to the contribution limits in RCW [42.17A.405](#).

(c) Contributions made to a caucus political committee, to a candidate or candidate's authorized committee which are earmarked for internal organization expenditures or fund-raising are presumed to be with direct association with individual candidates and therefore not exempt contributions and are subject to the contribution limits in RCW [42.17A.405](#).

(2) "Exempt contributions account" is the separate bank account into which only exempt contributions are deposited and out of which only expenditures for exempt activities shall be made.

(3) "Exempt activities" are those activities referenced in RCW [42.17A.405](#) as further clarified by subsections (4), (5), and (6) of this section. Only exempt activities are eligible for payment with exempt contributions.

(4)(a) Activities referenced in RCW [42.17A.405](#) (15)(a) that do not promote, or constitute political advertising for, one or more clearly identified candidates qualify as exempt activities. For example, get-out-the-vote telephone bank activity that only encourages persons called to "vote republican" or "vote democratic" in the upcoming election may be paid for with exempt contributions regardless of the number of candidates who are benefited by this message. Expenditures or contributions for electioneering communications made in cooperation, consultation, concert or collaboration with, or at the request or suggestion of a candidate, the candidate's authorized committee or agent do not qualify as exempt activities, under WAC [390-05-210](#).

(b) Except as permitted under WAC [390-17-030](#), Sample ballots and slate cards, activities referenced in RCW [42.17A.405](#) (15)(a) that promote or constitute political advertising for one or more clearly identified candidates do not qualify as exempt activities.

(c) A candidate is deemed to be clearly identified if the name of the candidate is used, a photograph or likeness of the candidate appears, or the identity of the candidate is apparent by unambiguous reference.

(5)(a) "Internal organization expenditures" referenced in RCW [42.17A.405](#) (15)(b) are expenditures for organization purposes, including legal and accounting services, rental and purchase of equipment and office space, utilities and telephones, postage and printing of newsletters for the organization's members or contributors or staff when engaged in organizational activities such as those previously listed, all without direct association with individual candidates.

(b) "Fund-raising expenditures" referenced in RCW [42.17A.405](#) (15)(b) are expenditures for fund-raising purposes, including facilities for fund-raisers, consumables furnished at the event and the cost of holding social events and party conventions, all without direct association with individual candidates.

(c) If expenditures made pursuant to (a) and (b) of this subsection are made in direct association with individual candidates, they shall not be paid with exempt contributions.

(6) For purposes of RCW [42.17A.405](#) and this section, activities that oppose one or more clearly identified candidates are presumed to promote the opponent(s) of the candidate(s) opposed.

Respectfully submitted this 26th day of August, 2024.

s/_____
Electronically Signed by Jennifer Hansen
PDC Compliance Officer

List of Exhibits

Exhibit #1 Complaints filed with the PDC by Stacey Valenzuela against the WSRP, received October 27, 2023.

Exhibit #2 Complaint filed with the PDC by Heidi Schauble against WSRP, received November 7, 2023.

Exhibit #3 Complaints filed with the PDC by Jacki Bricker and Ron Critchfield, both received February 1, 2024.

Exhibit #4 Initial response, submitted by Braden Batt on behalf of WSRP, on January 16, 2024.

Exhibit #5 Amended C-4 report submitted on January 26, 2024, by WSRP Non-Exempt account.

Exhibit #6 C-4 report submitted on January 10, 2024, by WSRP Exempt account.

Exhibit #7 Subpoena sent to Onvoy LLC dba Inteliquent on December 4, 2023

Exhibit #8 Response to Subpoena, received December 8, 2023

Exhibit #9 Commercial Advertiser Request sent to SignalWire, Inc. on December 19, 2023 & response received December 20, 2023

Exhibit #10 Commercial Advertiser Request sent to Prompt.io on December 26, 2023

Exhibit #11 Response from Prompt.io, received December 29, 2023

Exhibit #12 PDC Staff request regarding debt reporting sent on February 16, 2024 & WSRP confirmation, received February 26, 2024

Exhibit #13 PDC Staff request regarding contribution made from exempt account sent on May 23, 2024 & WSRP confirmation, received May 31, 2024

EXHIBIT 1

Respondent Name
Washington State Republican Party
Complainant Name
Stacey Valenzuela
Complaint Description
Svalenz229 reported via the portal (Fri, 27 Oct 2023 at 8:08 AM) Text attached
What impact does the alleged violation(s) have on the public?
Huge biased slander
List of attached evidence or contact information where evidence may be found
Text received ict 26 from 425.758.2022 by several residents
List of potential witnesses with contact information to reach them
See text
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.

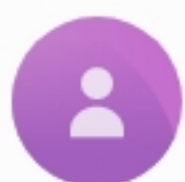
< (425) 758-2022



Add to contacts

Block number

Thursday, October 26, 2023



REJECT Han
Tran, antisemitic
Northshore school
board candidate
who calls for
Israel's destruction
and elimination
of Jews! VOTE by
11/7, protect kids.

STOP2END

3:47 PM



Respondent Name
Washington State Republican Party
Complainant Name
Stacey Valenzuela
Complaint Description
Svalenz229 reported via the portal. B
What impact does the alleged violation(s) have on the public?
Slander text received 10/26 on 19/27 requested name of who sent text with request for who sponsored text slandering one candidate and for another
List of attached evidence or contact information where evidence may be found
Text copy sent earlier and my text response..other neighbors received text as well.
List of potential witnesses with contact information to reach them
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.

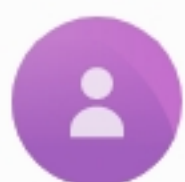
< (425) 758-2022



Add to contacts

Block number

Thursday, October 26, 2023



REJECT Han
Tran, antisemitic
Northshore school
board candidate
who calls for
Israel's destruction
and elimination
of Jews! VOTE by
11/7, protect kids.

STOP2END

3:47 PM



< (425) 758-2022



Please advise who
is this

12:19 PM

The PDC has received several inquiries about how to provide sponsor ID for political advertising via text message, which is considered an online transmission method under [WAC 390-05-290\(2\)](#). PDC staff has advised political committees that text messages are eligible to use the small online ad alternative outlined in [WAC 390-18-030](#), which allows sponsor ID to be provided using an "automatic display" that takes the reader directly to the required disclosures.

Since some phones receiving the text will not be able to follow a link, we suggest campaigns include, in addition to a web address, mechanisms that allow the recipients to request sponsor ID information. Sponsors should make

Pdc requires
sponsor on text

MMS

12:22 PM

STOP2END



EXHIBIT 2

Respondent Name
Washington State Republican Party
Complainant Name
Heidi Schauble
Complaint Description
Heidijoy520 reported via the portal Source failed to disclose who sponsored political advertisement through text message even after several requests for this information.
What impact does the alleged violation(s) have on the public?
Failure to comply with requirement to disclose sponsor for political campaign via text message. The message contained false information about a candidate to help their opponent. The inability to trace the source prevents the public from verifying the accuracy of this information and sways how they inform their vote.
List of attached evidence or contact information where evidence may be found
List of potential witnesses with contact information to reach them
Screenshot of text message
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.

Thursday, Oct 26 • 8:16 PM

Again, who is sponsoring this communication?

You are required to disclose this information. Failing to do so is a PDC violation.

Thursday, Oct 26 • 3:53 PM

Texting with +1 206-474-3373 (SMS/MMS)

REJECT Han Tran,
antisemitic Northshore
school board candidate
who calls for Israel's
destruction and
elimination of Jews! VOTE
by 11/7, protect kids.

STOP2END

Thursday, Oct 26 • 5:10 PM

Who is the sponsor of this political communication??

<https://www.pdc.wa.gov/news/2018/sponsor-id-text-messages?fbclid=IwAR0UI1W6DCKocJPpl-JLn3IYgu2hneABv5ZafsK0GxngzzOsh3eKwfXW5>

E

EXHIBIT 3

Respondent Name
Washington State Republican Party
Complainant Name
Jacki Bricker
Complaint Description
<u>Jacki Bricker</u> reported via the portal (Thu, 1 Feb 2024 at 11:11 AM) The Washington State Republican party bought text lists and sent out broad communications anonymously on at least October 26, 2023, alleging that Northshore school board candidate Han Tran is anti-Semitic and was calling for Israel's destruction and the elimination of Jews. It was extremely upsetting and it was specifically designed to be misleading and reduce support for the candidate and to sew chaos. These cowardly lies were specifically designed to bolster support for the GOP candidate.
What impact does the alleged violation(s) have on the public?
The Washington State Republican party bought text lists and sent out broad communications anonymously on at least October 26, 2023, alleging that Northshore school board candidate Han Tran is anti-Semitic and was calling for Israel's destruction and the elimination of Jews. It was extremely upsetting and it was specifically designed to be misleading and reduce support for the candidate and to sew chaos. These cowardly lies were specifically designed to bolster support for the GOP candidate.
List of attached evidence or contact information where evidence may be found
I have attached a screenshot of the text I received on October 26, 2023 at 4:06 PM.
List of potential witnesses
My husband Ron Critchfield also received this text at the same time. His email is ron.critchfield@cybercatt.com .
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.



(425) 758-2022



Why this looks like spam

Similar messages you received were identified as spam. Google keeps your personal information private, safe, and secure.

Not spam

Thursday, Oct 26 • 4:06 PM

Texting with (425) 758-2022 (SMS/MMS)

REJECT Han Tran,
antisemitic Northshore
school board candidate
who calls for Israel's
destruction and
elimination of Jews! VOTE
by 11/7, protect kids.



STOP2END



Text message



Respondent Name
Washington State Republican Party
Complainant Name
Ron Critchfield
Complaint Description
<u>Ron Critchfield</u> reported via the portal 2 hours ago (Thu, 1 Feb 2024 at 11:34 AM) On October 26th I received a text message from 425-209-3360 claiming that Han Tran was antisemitic and called for Israel's destruction and elimination of Jews. I replied back to the text asking who was the sponsor of the political communication. I also sent email to Myriam Juritz who was running against Han Tran who claimed not to know who was responsible. As a Jew myself, I found these lies about Han Tran to be very offensive. It trivializes the real antisemitism that exist with these false claims.
What impact does the alleged violation(s) have on the public?
It spreads lies and misinformation about Han Tran. In addition, it also trivializes true antisemitism. As a Jew myself, I find this very offensive.
List of attached evidence or contact information where evidence may be found
Photo below
List of potential witnesses
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.



(425) 758-2022



Why this looks like spam

Similar messages you received were identified as spam. Google keeps your personal information private, safe, and secure.

Not spam

Thursday, Oct 26 • 4:06 PM

Texting with (425) 758-2022 (SMS/MMS)

REJECT Han Tran,
antisemitic Northshore
school board candidate
who calls for Israel's
destruction and
elimination of Jews! VOTE
by 11/7, protect kids.



STOP2END



Text message



EXHIBIT 4

Brady Batt replied

Tue, 16 Jan 2024 at 1:37 PM

To:"PDC Support" <pdcc@pdcc.wa.gov>

External Email

Thank you for reaching out on this case. We acknowledge that the Party failed to provide sponsor identification on this SMS project. It was a very small project, a value of only \$150. It was still in the draft status of our regular review process when it was accidentally queued up with other, much larger, SMS projects we were sending out at the same time – those other SMS projects were properly reviewed and compliant.

We apologize that this project was sent out before being properly approved for PDC standards. We do take care in running clean and compliant programs according to PDC standards. We've refined our internal review process and added elements to eliminate this recent error going forward.

Thank you again for reaching out and please let me know if there is any additional information you need for this case.

Brady Batt
Executive Director
Washington State Republican Party
425-460-0570 (office)

EXHIBIT 5

SUMMARY, FULL REPORT RECEIPTS AND
EXPENDITURES

C4



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

WA ST REPUB PARTY NON EXEMPT

11811 NE 1ST ST STE A306
BELLEVUE, WA

Coverage: 10/17/2023 to 10/30/2023

Final report: No

Report number: 110198702 Amends 110185309

Reporting year: 2023

Date submitted: 01/26/2024

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$226,109.30
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$0.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$226,109.30
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$135,320.13
11. Cash expenditures (Line 3 schedule A).	\$55,000.00	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$55,000.00
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$190,320.13

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$35,789.17
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$16,362.76
20. Balance (Lines 18 - 19)		\$19,426.41

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Braden Batt - 01/26/2024

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$0.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$0.00
10/19/2023	Washington State Republican Party Exempt 11811 NE 1st St Ste A , Bellevue, WA 98005-3033	Transfer to Exempt account for cash flow	\$40,000.00
10/26/2023	Re-Elect Adam for Snohomish County Sheriff (Adam C. Fortney) PO Box 1084 , Lake Stevens, WA	Contribution to Adam Fortney: Snohomish Sheriff G2023	\$15,000.00
			\$55,000.00

4. TOTAL EXPENDITURES: \$55,000.00

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

No in-kind contributions reported this period

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

First debt incurred	Recipient/Vendor	Description	Balance owed (as of this reporting period)
10/24/2022	Print NW 9914 32nd Ave S , Lakewood, WA 98499-9265	In-kind postage 64,301 mailers Jesse Young SD26 G2022	\$7,732.91
01/01/2014		Printing	\$79.00
07/29/2020		In-kind flyer design Greg Gilday LD10 Pos. 1 P2020	\$658.72
10/26/2023	Prompt.io Inc. 2815 Eastlake Ave. E. Ste. 135 , Seattle, WA 98102-3086	GOTV text messages - Myriam Jurtiz Northshore School Dis. Dir. Pos. 3	\$159.22
10/24/2022	Print NW 9914 32nd Ave S , Lakewood, WA 98499-9265	In-kind postage 64,301 mailers Jesse Young SD26 G2022	\$7,732.91

Report notes/attachments

EXHIBIT 6

**SUMMARY, FULL REPORT RECEIPTS AND
EXPENDITURES****C4**

711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

WA ST REPUB PARTY EXEMPT

11811 NE 1ST ST STE A306
BELLEVUE, WA

Coverage: 12/01/2023 to 12/31/2023

Final report: No

Report number: 110196754

Reporting year: 2023

Date submitted: 01/10/2024

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$660,995.92
2. Cash received (Schedule A line 1).	\$133,000.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$133,000.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$793,995.92
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$631,829.65
11. Cash expenditures (Line 3 schedule A).	\$151,152.25	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$151,152.25
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$782,981.90

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$11,014.02
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$845.90
20. Balance (Lines 18 - 19)		\$10,168.12

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Braden Batt - 01/10/2024

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
12/11/2023	\$90,000.00	12/20/2023	\$43,000.00		

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$133,000.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$32.95
12/11/2023	Let's Go Washington PO Box 581 , Tacoma, WA 98401-0581	Contribution to Committee	\$100,000.00
12/11/2023	Ard Law Group PLLC PO Box 11633 , Bainbridge Island, WA 98110-5633	King County Election Legal Notice (not candidate related)	\$2,779.30
12/13/2023	Olivia Hoskinson 3808 12th Ave. SE , Lacey, WA 98503-2007	Utilities, phone, and other overhead costs: REIMB Staples Aberdeen PCO Training Supplies	\$340.00
12/20/2023	Washington State Republican Party 11811 NE 1st St Ste A306 , Bellevue, WA 98005-3033	Transfer to fed account for non-fed share of allocable admin and fundraising Nov	\$48,000.00
			\$151,152.25

4. TOTAL EXPENDITURES: \$151,152.25

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

No in-kind contributions reported this period

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

First debt incurred	Recipient/Vendor	Description	Balance owed (as of this reporting period)
01/01/2014		Legal Fees	\$434.65
04/01/2014		Legal fees	\$411.25

Report notes/attachments

EXHIBIT 7



**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.pdc.wa.gov

To: Onvoy, LLC d/b/a Inteliquent

Attention: Legal Department

Email: Legal@inteliquent.com

From: Peter Frey Lavallee, Executive Director

Phone#: 360-753-1111 (Main Office)

Re: **Urgent** Request for Information

Reference: Complaint 144096 & Complaint 144173 & Complaint 144359

425-758-2022

425-209-3355

Please see attached subpoena for records for information regarding text services provided to the renter/owner of 425-758-2022 & 425-209-3355 for the approximate time period of October 26, 2023 through November 7, 2023.

Please respond by December 10, 2023. You may supply records via mail to Public Disclosure Commission at 711 Capitol Way Rm 206 Olympia WA 98504-0908 (FedEx or UPS) or PO Box 40908 Olympia WA 98504-0908 (US Postal Service) or via email at pdcc@pdcc.wa.gov with a subject line including "Attention: Compliance".

Thank you,

Peter Frey Lavallee
Peter Frey Lavallee (Dec 4, 2023 12:51 PST)

Peter Frey Lavallee
Executive Director
Public Disclosure Commission



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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

**BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON**

**IN THE MATTER OF THE
INVESTIGATION OF**

**425-758-2022
425-209-3355**

Respondent.

**PDC Complaints 144096,
144173 & 144359**

SUBPOENA DUCES TECUM

To: Legal Department, Onvoy LLC dba Inteliquent; legal@inteliquent.com

IN THE NAME OF THE STATE OF WASHINGTON, and under the authority of RCW 42.17A.110 and Washington Administrative Code 390-37-063, you are hereby required to provide printed copies of any and all documents, contracts, invoices, receipts, and/or emails, concerning the publisher, sponsor, or owner/renter for the phone numbers 425-758-2022 & 425-209-3355 during the approximate time period of October 26, 2023 through November 7, 2023. The information being requested includes the following:

- Purchaser name, address, phone number and email address.
- Method of payment information and who provided payment.
- The total cost of the services provided.
- Dates your business rendered service.

You are hereby required to deliver the requested documents **by Monday, December 11, 2023**, to the offices of the Public Disclosure Commission, 711 Capitol Way, Room 206, Olympia, Washington 98504-0908.

In the event of your unexcused failure to comply with this subpoena duces tecum, the undersigned will apply to the Superior Court for an appropriate order or other remedy.

Dated this 5th day of December 2023.

FOR THE PUBLIC DISCLOSURE COMMISSION

Peter Frey Lavallee

Peter Lavallee, Executive Director



Onvoy LLC dba Inteliquent Subpoena 12042023

Final Audit Report

2023-12-04

Created:	2023-12-04
By:	Tabitha Townsend (tabitha.townsend@pdc.wa.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAASLgfp2asASMb09NsSIIDEqGIVi2ZS7SJ

"Onvoy LLC dba Inteliquent Subpoena 12042023" History

-  Document created by Tabitha Townsend (tabitha.townsend@pdc.wa.gov)
2023-12-04 - 8:19:41 PM GMT- IP address: 73.225.109.169
-  Document emailed to peter.lavallee@pdc.wa.gov for signature
2023-12-04 - 8:20:26 PM GMT
-  Email viewed by peter.lavallee@pdc.wa.gov
2023-12-04 - 8:51:30 PM GMT- IP address: 104.47.64.254
-  Signer peter.lavallee@pdc.wa.gov entered name at signing as Peter Frey Lavallee
2023-12-04 - 8:51:56 PM GMT- IP address: 174.165.198.117
-  Document e-signed by Peter Frey Lavallee (peter.lavallee@pdc.wa.gov)
Signature Date: 2023-12-04 - 8:51:58 PM GMT - Time Source: server- IP address: 174.165.198.117
-  Agreement completed.
2023-12-04 - 8:51:58 PM GMT

EXHIBIT 8

From: Scott Kellogg [scott.kellogg@sinch.com]
Sent: 12/8/2023 5:32 PM
To: pdcc@pdcc.wa.gov
Subject: RE: PDC Complaints 144096, 144173 & 144359 (231426 - 416159) []

This email confirms receipt by Sinch Voice, operating under the legal name Inteliquent, Inc.; its parent company Onvoy, LLC; and their affiliates (collectively "Inteliquent/Sinch Voice") of the above-referenced matter transmitted via the email below, concerning telephone number(s) 4257582022 and 4252093355 (a copy of which is attached).

As a preliminary matter, please refer to section 4.1 of our Support Guidelines (<https://www.sinch.com/legal/law-enforcement-support>), which specify that the due date for your matter is to be specified as **the first detail** of the subject line of your submitting email and in particular, in MM/DD/YY format (section 4.1.2). The subject line of your message populates a field in the case that is auto-generated in our processing system by each matter that is submitted to LEArequests@sinch.com (which replaces our prior address Legal@Inteliquent.com – please update your agency's records, as this address is being phased out). Where the date is **omitted or otherwise obscured** (by later placement in the subject line, reference to some relative interval, or use of terms in lieu of a specified date [e.g., terms such as "urgent", "forthwith", or "as soon as possible" are no substitute for designate the due date required by our Guidelines]), a submission will be subject to default processing (20 business days due date is applied to the case; processed **only** in order of receipt [presently, 15-20 business days]).

It is fortunate that the instant matter was observed despite placement of the due date at or near the end of your subject line **contrary** to our specification (i.e., subject line "Urgent Information Request - Response Requested by December 11, 2023") and moved from default processing, resulting in this response. Please make note of this specific requirement for going forward purposes.

Additionally, please note section 4.1.1 of our Guidelines, which directs the submission of a **completed Cover Page Form** as a separate, secondary document along with each submitted Legal Demand. This required form standardizes submissions -- form and content can vary widely across the thousands of law enforcement agencies with whom we interact; key details may be lacking (which delays processing); and items may be requested beyond what should typically be sought from us (as a provider of wholesale services, as discussed herein). The content inputted into our form also facilitates processing by supplying us with usable text (e.g., avoiding the need to retype numbers and email addresses, which reduces risk of typos and oversights). Accordingly, we specify that the form should not only be fully completed, but also never handwritten, scanned, or combined (never consolidate our form into a file with any other documents). Our form can be downloaded from our website page <https://www.sinch.com/legal/law-enforcement-support/>. The instant Legal Demand was processed despite submission contrary to our Guidelines concerning the cover page form (i.e., no form submitted); however, future submissions contrary to our Guidelines are **subject to delayed processing or rejection altogether**.

As your agency will recall, Inteliquent/Sinch Voice generally does not have end user subscribers. Rather, our customers are typically other service providers (wireline, wireless, VOIP, etc.) to whom we provide wholesale communications interconnection services, delivering traffic between the networks of such providers involving telephone numbers that were either: (a) allocated to our company and released to such a service provider customer, or else (b) owned by a service provider customer who has ported the number to Inteliquent/Sinch Voice.

In either case, the telephone number belongs to another service provider, who has the end user subscriber(s) utilizing the number and who will have records for all calls relating to the number (we will have no relationship with or information about the end user subscribers of our wholesale customers). Comparatively, our records will be incomplete (our services are not exclusive; rather, we will only have carried traffic that our wholesale customer wanted delivered by us) and will be redundant to

the extent they exist (our customer will have counterpart records for calls crossing our network, as well as records for all other calls involving the target number and which did not cross our network). As the party who is actually providing **retail services to their end user subscriber**, our service provider customer will also be in possession of various items (e.g., billing/payment records, end user equipment information, message content, identification of related telephone numbers) commonly sought by requesting agencies, and which will never be reflected in our records.

Our records identify the following customer for telephone number(s) 4257582022 and 4252093355:

SignalWire, Inc.
228 Hamilton Avenue, 3rd Floor
Palo Alto, CA 94301
Phone: 650-382-0000
Email: legal@signalwire.com

In closing, please consider registering for our Law Enforcement Portal. Our Portal eliminates the need to submit **most legal demands** to our company. The Portal will provide customer identifying information about target phone numbers on an immediate, on-screen basis and without the need for serving legal process to us. Accordingly, since this customer's numbers are in our Portal, you could have obtained the wholesale customer's identity simply by being a registered user.

Our Portal allows credentialed users to query this online resource for numbers identified by your agency as being in-service with us. It is populated with numbers for which we have the proactive consent of our wholesale customers for CPNI purposes for the disclosure of their information (note: we generally **only** provide wholesale communications interconnection services on a non-exclusive basis to other service providers; while our customers are other service providers, CPNI requirements still apply). Where a number returns a positive result in our Portal (i.e., in-service for customer who has proactively consented), you receive **immediate on-screen** customer identifying information (no legal demand needs to be submitted to us). Where a non-result occurs for a queried number (e.g., no customer proactive consent for CPNI purposes; number not in-service on query date), your agency will need to submit a legal demand to us consistent with sec. 4.1 of our Guidelines.

Our Portal can be accessed **only** by registered law enforcement and government agency officers, agents, and support personnel who would otherwise issue, serve, and/or receive returns for Legal Demands involving our company. All necessary information about our Portal is posted on our website at <https://www.sinch.com/legal/lea-portal/>. Sections of this page explain "Who Can Apply for Access?" and "How to Apply for Portal Access". Posted at the end of the latter (within the blue highlighted box enclosing the section) is our current application form and user guide, as well as specific instructions for submission to our separate dedicated address LEAportal@Sinch.com (contrary submissions are subject to delayed processing or rejection). Processing time is approximately **7-10 business days** from submission. Please do not inquire about status until after this interval, including where you submitted a legal demand to LEArequests@Sinch.com or you are about to do so (we cannot expedite and will not reply to such requests).

Please let me know if you have any questions. Kind regards.

Scott Kellogg | 312-384-8086 | scott.kellogg@sinch.com
Inteliquent/Sinch Voice
1 North Wacker Drive, Suite 2500
Chicago, IL 60606

EXHIBIT 9

[Tabitha Townsend](#) emailed legal@signalwire.com

Tue, 19 Dec 2023 at 2:12 PM

From: pdc@pdc.wa.gov

Attention: Even McGee

I am Tabitha Townsend, a Compliance Coordinator with the Public Disclosure Commission (PDC) and we regulate, in part, candidates seeking election to public office and political committees in Washington State, and commercial advertisers/printers who accept/publish/print political advertising that support or oppose candidates or ballot propositions in Washington State.

[RCW 42.17A.345](#) states the following:

“(1) Each commercial advertiser who has accepted or provided political advertising or electioneering communications during the election campaign shall maintain current books of account and related materials as provided by rule that shall be open for public inspection during normal business hours during the campaign and for a period of no less than five years after the date of the applicable election

“At the request of the commission, each commercial advertiser required to comply with subsection (1) of this section shall provide to the commission copies of the information that must be maintained and be open for public inspection pursuant to subsection (1)...”

In accordance with the statute referenced above, we are seeking information about the text messages sent regarding campaigns in the Washington State Election Cycle from 4257582022 and 4252093355 that were distributed during the approximate time frame of October 1, 2023 to November 7, 2023. Please provide the following:

- 1. Purchaser name, address, phone number and email address.
- 2. Method of payment information and who provided payment.
- 3. Quantity of items.
- 4. The total cost of the advertising or electioneering communication.
- 5. Date(s) your business rendered service.

[WAC 390-18-050\(4\)](#) states that information concerning political advertising must be made available within twenty-four hours of request. PDC staff is requesting you electronically provide the requested information no later than **December 21, 2023** by email.

Thank you for your prompt attention to this matter and let me know if you have any question.

Sincerely,

Tabitha Townsend
Compliance Coordinator
360.586.4555 | 360.753.1111

[Jon Slomski](#) reported via email

Wed, 20 Dec 2023 at 6:36 AM

To:"PDC Support" <pdcc@pdcc.wa.gov>

Cc:legal@signalwire.com, subpoena.compliance@signalwire.com

External Email

Hi Tabitha,

I am the Compliance Specialist at SignalWire, Inc. SignalWire is not an advertiser itself. Rather, it resells telecommunications products to businesses who have their own customers / end users. Therefore, SignalWire does not possess such a granular record of its customers' customers' usage.

However, I would be able to provide the purchaser's name and information (1), method of payment (2), and the date(s) of activity (5) connected to those two phone numbers. You may have to contact who I can identify as the purchaser in order to determine the quantity of items (3) and total cost of advertising or electioneering communication (5) involved.

Would you like me to provide the information I possess, or would you rather contact our downstream customer(s) who used the two phone numbers?

Thank you,

Jon

EXHIBIT 10

Tue, 26 Dec 2023 at 12:12 PM

Attention: Prompt.io inc.

I am Jordan Campbell, a Compliance Coordinator with the Public Disclosure Commission (PDC) and we regulate, in part, candidates seeking election to public office and political committees in Washington State, and commercial advertisers/printers who accept/publish/print political advertising that support or oppose candidates or ballot propositions in Washington State.

[RCW 42.17A.345](#) states the following:

*“(1) Each commercial advertiser who has accepted or provided political advertising or electioneering communications during the election campaign shall maintain current books of account and related materials as provided by rule that shall be open for public inspection during normal business hours during the campaign and for a period of no less than five years after the date of the applicable election
“At the request of the commission, each commercial advertiser required to comply with subsection (1) of this section shall provide to the commission copies of the information that must be maintained and be open for public inspection pursuant to subsection (1)...”*

In accordance with the statute referenced above, we are seeking information about the text messages sent regarding campaigns in the Washington State Election Cycle from 4257582022 and 4252093355 that were distributed during the approximate time frame of October 1, 2023 to November 7, 2023. Please provide the following:

- 1. Purchaser name, address, phone number and email address.
- 2. Method of payment information and who provided payment.
- 3. Quantity of items.
- 4. The total cost of the advertising or electioneering communication.
- 5. Date(s) your business rendered service.

[WAC 390-18-050\(4\)](#) states that information concerning political advertising must be made available within two business days of request. PDC staff is requesting you electronically provide the requested information no later than **December 28, 2023**, by email.

Thank you for your prompt attention to this matter and let me know if you have any question.

Sincerely,

Jordan Campbell
Compliance Coordinator
360.912.9169 | 360.753.1111

EXHIBIT 11

Barb Smith reported via email

Fri, 29 Dec 2023 at 10:03 AM

To:"PDC Support" <pdcc@pdcc.wa.gov>, legal@prompt.io

External Email

Jordan,

Please see below in response to your email request above:

1. Purchaser name, address, phone number and email address.

Washington State Republican Party

11811 NE 1st St, Suite A306

Bellevue, WA

98005

425-460-0570

brady@wsrp.org

2. Method of payment information and who provided payment.

Payment was made via electronic check payment through our payment processor by Washington State Republican Party.

3. Quantity of items.

There were 3175 text messages sent by the aforementioned Client from the phone numbers in question during the period in question.

4. The total cost of the advertising or electioneering communication.

The cost to the Client of sending the above-referenced text messages was \$159.22.

5. Date(s) your business rendered service.

The Client has contracted for a subscription to use our platform to send text messages through the entire period referenced above.

Thank you.



Barb Smith

COO

[Web](#) | [Twitter](#) | [LinkedIn](#)

EXHIBIT 12

[Jennifer Hansen](#) replied

Fri, 16 Feb 2024 at 4:31 PM

To:brady@wsrp.org

Brady Batt,

Thank you for your follow up message. I was able to review the report you referenced and have some questions about the content.

The specific expenditure I was looking for was the one listed for \$159.22 on 10/26/2023 to Prompt.io Inc for the text messages. My question about this expenditure is why it is appearing in the "orders placed, debts and obligations" portion of the C-4 report. Please confirm if this was in fact a debt and if it is still outstanding. (See screenshot below.)

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

No in-kind contributions reported this period

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

First debt incurred	Recipient/Vendor	Description	Balance owed (as of this reporting period)
10/24/2022	Print NW 9914 32nd Ave S, Lakewood, WA 98499-9265	In-kind postage 64,301 mailers Jesse Young SD26 G2022	\$7,732.91
01/01/2014		Printing	\$79.00
07/29/2020		In-kind flyer design Greg Gilday LD10 Pos. 1 P2020	\$658.72
10/26/2023	Prompt.io Inc. 2815 Eastlake Ave. E. Ste. 135, Seattle, WA 98102-3086	GOTV text messages - Myriam Jurtiz Northshore School Dis. Dir. Pos. 3	\$159.22
10/24/2022	Print NW 9914 32nd Ave S, Lakewood, WA 98499-9265	In-kind postage 64,301 mailers Jesse Young SD26 G2022	\$7,732.91

In addition, a review of the other entries on the same C-4 report plus earlier C-4s, show several items in the "orders placed, debts and obligations" section, some dating back to 2022, 2020 and 2014. These other entries are not the subject of this complaint, however, I believe they may need correction. For your information, it is generally uncommon to have unpaid debts owed to vendors for several years.

I would like to put one of Filer Assistance team members in touch with whomever is doing the review of the party's activities. You mentioned a compliance team but did not provide a point of contact. Please let me know who on your compliance team would be the best person for us to work with.

Thank you for your attention. A response by **Monday, February 26, 2024**, is appreciated.

Jennifer Hansen (she/her)
Compliance Officer
Public Disclosure Commission
pdcc@pdcc.wa.gov

1.360.586.4560

****Please click Reply when responding to this email**

[Brady Batt](#) replied

Mon, 26 Feb 2024 at 4:27 PM

To:"PDC Support" <pdcc@pdcc.wa.gov>

External Email

Hi,

Yes, the payment to prompt is still debt since they have not cashed the check yet.

The other reported debts are standard for FEC side, and we just carry it over to the PDC side.

Our compliance team contact would be Ashley.carter@aristotle.com.

Kind Regards,

Brady Batt
Executive Director
Washington State Republican Party

EXHIBIT 13

[Jennifer Hansen](#) replied

Thu, 23 May 2024 at 3:17 PM

To:brady@wsrp.org

Brady Batt,

I appreciate your continued cooperation. I appreciate your answer to my request regarding the "other" text messages sent in 2023.

As mentioned previously, when I spoke to Ashley Carter from Aristotle, I asked if she would amend the C-4 report disclosing the October 26, 2023, text message expenditure one more time to add the number of text messages. She indicated that she needed to obtain this number from you in order to amend the reports. I do not see the requested amendment yet. I appreciate a follow up on this as well.

I hope you will send a response to me by Friday, April 26, 2024.

While conducting an investigation into a separate matter, another matter came to our attention. On the C-4 report (confirmation number 110196754) disclosing activity for December 1 to 31, 2023, a \$100,000 monetary contribution was reported from the exempt account to Let's Go Washington. I request confirmation that this contribution was made from the exempt account.

Thank you for your prompt attention. A response by Friday, May 31, 2024, is appreciated.

Jennifer Hansen (she/her)
Compliance Officer
Public Disclosure Commission
pdcc@pdcc.wa.gov
1.360.586.4560

****Please click Reply when responding to this email**

[Brady Batt](#) replied

Fri, 31 May 2024 at 9:55 AM

To:"PDC Support" <pdcc@pdcc.wa.gov>

External Email

Hi Jennifer,

1. The texting information was provided to Aristotle to make the updated report and it should be filed soon.

2. I can confirm that the contribution came from the State Party's exempt account. It has been a well-established practice of the State Party to write cash contributions out of the exempt account to non-candidate Political Committees/PACs. In previous elections, the State Party has not received any violations or correcting guidance from the PDC to suggest that the practice is non-compliant. If the PDC is now suggesting that the expenditure in question is non-compliant,

the State Party would appreciate clarification and updated guidance from the PDC to help make sure future expenditures of this nature are compliant.

Thank you!