



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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August 4, 2025

Delivered electronically to jfcp@capcompliance.com, mitrani@sandlerreiff.com and cg.edwards53@gmail.com

Subject: PDC Case 170918 regarding Jane Fonda Climate PAC

Dear Jane Fonda Climate PAC:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on April 16, 2025. The complaint alleged a violation of RCW 42.17A.235 and .240 by failing to timely and accurately report legal expenses. Specifically, the complaint alleged that Jane Fonda Climate PAC (the “Respondent”) utilized a law firm to respond to a previous PDC complaint but did not disclose the cost thereof as an expenditure or in-kind contribution on subsequent reports filed with the PDC.

Applicable Laws and Rules

[RCW 42.17A.205](#) requires an in-state (Washington) political committee to register with the PDC by filing a *Committee Registration* (C-1pc report) within two weeks of organization or the date it first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. A committee that selects the Full Reporting option on their C-1pc report is required to report contributions and expenditures to the PDC on C-3 reports and C-4 reports pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the committee’s election participation¹, and their financial activity.

Pursuant to [RCW 42.17A.240\(2\)](#), monetary contributions are disclosed on C-3 reports. “Contribution,” as defined, includes an in-kind contribution, which is disclosed on a C-4 report.

Pursuant to [RCW 42.17A.240\(7\)](#), expenditures are disclosed on C-4 reports. An in-kind contribution is disclosed like an expenditure.

¹ [RCW 42.17A.005\(38\)](#) defines “participate” to mean that, with respect to a particular election, an entity engages in one or more of the following activities: 1) makes a monetary or in-kind contribution to a candidate; 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate; or 3) engages in an activity described in .005(38)(c), (d) or (e).

Per [RCW 42.17A.250](#), an out-of-state political committee organized for the purpose of supporting or opposing candidates or ballot propositions in another state that is not otherwise required to report under RCW 42.17A.205 through .240 is required to file a C-5 report when it makes an expenditure supporting or opposing a Washington state candidate or political committee, and disclose contributions and expenditures that exceed \$50 in the aggregate.

Background and Findings

- The Respondent is an out-of-state political committee that registered as an in-state (Washington State) continuing political committee with the PDC on November 4, 2024. The Respondent was registered as an in-state committee for nearly five months. The Respondent has been registered with the Federal Elections Commission (FEC) since 2022.
- Jane Fonda Climate PAC was also the Respondent in [PDC Case 164739](#), which was opened on January 7, 2025, and dismissed on March 10, 2025, with no finding of a violation. PDC Case 164739 alleged the out-of-state committee was required to register and report as an in-state committee.
 - In the prior case (164739), Sandler Reiff Lamb Rosenstein & Birkenstock, P.C., indicated they were serving as the Respondent’s legal counsel and responded to the complaint allegations. The law firm communicated with PDC staff regarding PDC Case 164739 from January 16, 2025, to March 10, 2025.
- The Respondent timely filed three monthly C-4 reports for January, February and March of 2025 as an in-state committee and did not disclose any expenditures made, or in-kind contributions received, for legal expenses. The March C-4 report was the in-state committee’s “final report” showing all funds were disbursed. On March 25, 2025, the Respondent emailed PDC staff and requested that their in-state committee registration be closed.
- On April 29, 2025, Dave Mitrani with Sandler Reiff Lamb Rosenstein & Birkenstock, P.C. submitted a written response on behalf of the Respondent to the complaint filed in this case (170918). The Respondent’s legal counsel conveyed the following information in their response:
 - Jane Fonda Climate PAC (also known as JanePAC) is an out-of-state committee that files C-5 reports with the PDC and is concurrently registered with the Federal Elections Commission (FEC).
 - Jane Fonda Climate PAC registered and briefly reported as a Washington PAC, per the PDC’s instructions, after the PAC sent out a fundraising solicitation by email that specifically mentioned Washington State ballot measure Initiative 2117.
 - JanePAC terminated their existence as a Washington PAC but continues to operate as an out-of-state committee.

- Administrative expenses, such as the legal expenses that are the subject of this complaint, were and are reported by JanePAC to the FEC.
 - If the PAC makes non-federal expenditures in Washington in the future, they will disclose them on a C-5 report. He said his client would also refrain from soliciting funds for Washington non-federal elections.
 - Given that JanePAC has terminated their existence as a Washington PAC but continues to operate as an out-of-state committee, and has reported their Washington-specific expenditures, the complaint filed in this case (170918) should be dismissed.
- According to reports filed with the FEC, the Respondent disclosed a total of \$14,880 in expenditures made to Sandler Reiff Lamb Rosenstein & Birkenstock for “legal services” from February 18, 2025, to May 12, 2025.

Summary and Resolution

The prior case (PDC Case 164739), for which you sought legal services that are the subject of the allegation made in this case (170918), was against your out-of-state PAC concerning registering as an in-state PAC based on a specific activity in October of 2024 that briefly triggered in-state registration. The legal costs were incurred by your out-of-state PAC², which has properly reported those expenses to the FEC.

Based on our findings, PDC staff has determined that, in this instance, no evidence supports the finding of a violation that warrants further investigation.

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

If you have questions, you may contact Tabatha Blacksmith 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 Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

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

cc: Conner Edwards

² Likewise, any legal expenses incurred in this case (170918) are deemed to be made by your out-of-state PAC.