



**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

August 22, 2025

Delivered electronically to Travis Merrigan at anybodybutwheeler@gmail.com

Subject: PDC Case 176278 regarding Change Bremerton

Travis Merrigan:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Katherine Woods on July 14, 2025. The complaint alleged violations of: RCW 42.17A.255, .260 or .305 and .320 for failure to timely report independent expenditures or electioneering communication and identify sponsor on political advertising in the 2025 election.

Applicable Laws and Rules

RCW 42.17A.255 requires a person making an independent expenditure (IE) equaling \$1,000 or more in the aggregate to disclose the expenditure to the PDC on a C-6 report within five days of making the expenditure. For the purposes of .255, an "independent expenditure" means "any expenditure that is made in support of or opposition to any candidate or ballot proposition and is not otherwise required to be reported pursuant to RCW 42.17A.225, .235 and .240," which are statutes that set forth reporting requirements for continuing, candidate, political and incidental committees.

Per RCW 42.17A.260, the sponsor of political advertising, including an independent expenditure, must file a C-6 report with the PDC within 24 hours of the date the ad is first published, mailed or otherwise presented to the public, if such presentation occurs within 21 days of an election and the advertising has a fair market value or actual cost of \$2,000 or more.

Per RCW 42.17A.305(2), electioneering communications shall be reported as follows: The sponsor of an electioneering communication shall report to the commission within twenty-four hours of, or on the first working day after, the date the electioneering communication is broadcast, transmitted, mailed, erected, distributed, digitally or otherwise, or otherwise published.

Per RCW 42.17A.005(30)(a), "Independent expenditure" means an expenditure that has each of the following elements: (i) It is made in support of or in opposition to a candidate for office by a person who is not: (A) A candidate for that office; (B) An authorized committee of that candidate for that office; and (C) A person who has received the candidate's encouragement or approval to make the expenditure, if the expenditure pays in whole or in part for political advertising supporting that candidate or promoting the defeat of any other candidate or candidates for that office; (ii) It is made in support of or

in opposition to a candidate for office by a person with whom the candidate has not collaborated for the purpose of making the expenditure, if the expenditure pays in whole or in part for political advertising supporting that candidate or promoting the defeat of any other candidate or candidates for that office; (iii) The expenditure pays in whole or in part for political advertising that either specifically names the candidate supported or opposed, or clearly and beyond any doubt identifies the candidate without using the candidate's name; and (iv) The expenditure, alone or in conjunction with another expenditure or other expenditures of the same person in support of or opposition to that candidate, has a value of one thousand dollars or more. A series of expenditures, each of which is under one thousand dollars, constitutes one independent expenditure if their cumulative value is one thousand dollars or more. The statute also outlines exemption to the law.

Per RCW 42.17A.005(21)(a), "Electioneering communication" means any broadcast, cable, or satellite television, radio transmission, digital communication, United States postal service mailing, billboard, newspaper, or periodical that: (i) Clearly identifies a candidate for a state, local, or judicial office either by specifically naming the candidate, or identifying the candidate without using the candidate's name; (ii) Is broadcast, transmitted electronically or by other means, mailed, erected, distributed, or otherwise published within sixty days before any election for that office in the jurisdiction in which the candidate is seeking election; and (iii) Either alone, or in combination with one or more communications identifying the candidate by the same sponsor during the sixty days before an election, has a fair market value or cost of one thousand dollars or more. The statute also outlines exemptions to the law.

Pursuant to RCW 42.17A.320, all written political advertising, as defined in RCW 42.17A.005(40), must include the name and address of the sponsor. Sponsor identification should appear on the first page or fold of the political advertising, in at least ten-point type, and be set apart from any other printed matter. WAC 390-18-010 indicates that all advertising must clearly state that it has been paid for by the sponsor. Political advertising undertaken as an independent expenditure or an electioneering communication by a person other than a bona fide political party must also include the statement "No candidate authorized this ad. It is paid for by (name, address, city, state)." Additional disclosures may be required, depending on the sponsor and type of advertising used. For a partisan office, if the candidate has expressed a party or independent preference on the Declaration of Candidacy, that party or independent designation shall be clearly identified in political advertising, electioneering communications, and independent expenditures.

[WAC 390-18-010](#) and [WAC 390-18-030](#) contain additional information regarding sponsor identification requirements and exemptions for political advertising, and alternatives for online advertising.

Background and Findings

- In response to the complaint, you indicated that "the website in question is my personal blog which expresses personal opinions" and that you used your own modest resources to create and disseminate the blog called Change Bremerton and a handbill of similar nature. The blog is located at <https://www.changebremerton.org> and the handbill was disseminated around the Bremerton area.
- Greg Wheeler is the incumbent candidate for Bremerton Mayor in the 2025 election. Based on information available to PDC staff, there is no evidence that you coordinated with a candidate or

committee in the development of the blog and handbill that are in opposition to the election of Greg Wheeler.

- You told PDC staff that you personally spent a total of \$269.51 on the development and management of the blog and the creation and dissemination of the handbill provided as evidence in this case. Based on this information, there is evidence that your activity exceeded the expenditure thresholds outlined WAC 390-18-030 and therefore required complete sponsor identification on the political advertising.
- You have also told staff that you did not receive any monetary or in-kind support and that the blog and handbill were your only activity in the primary election and that you are not planning any other activity during the general election.
- On July 29, 2025, you updated the website to include complete sponsor identification including your full name and address. You also made notification across various social media of your responsibility for the political advertising.
- Based on the available evidence, it does not appear that during the primary election you exceeded the threshold over which you would have been required to submit the Independent Spending & Electioneering Communications (C-6) report.
- You do not have previous warnings or violations of PDC requirements.

Summary and Resolution

The violations of PDC laws and rules made by you are remediable in nature and do not warrant further investigation or enforcement action. Because you took corrective action within five business days after being notified of noncompliance by PDC staff, the violations did not materially harm the public interest beyond the harm to the policy of Chapter 42.17A RCW inherent in any violation.

After consideration of all the circumstances, further proceedings would not serve the purposes of the Fair Campaign Practices Act. Under WAC 390-37-070, the executive director, at any time prior to consideration by the Commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted. The executive director must report at each regular Commission meeting all complaints dismissed.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, contact Tanya Mercier by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: Katherine Woods