



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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November 18, 2025

Delivered electronically to Charlotte Benjamin, Treasurer, on behalf of Washington Patriot State PAC at lilylangtree@yahoo.com

Subject: PDC Case 175492 & 176587 regarding Washington Patriot State PAC

Washington Patriot State PAC:

The Public Disclosure Commission (PDC) has completed its review of two complaints filed by Andrew Koeppen on July 9, 2025 and July 16, 2025. The complaints alleged violations of RCW 42.17A.235, .240 and .320 for failure to timely and accurately report contributions and expenditures in election years 2025 and 2025, specifically website-related expenditures and expenditure descriptions, for failure to display complete sponsor ID on the committee's website, in the complaint filed on July 16, 2025; and for failure to accurately report a contribution, in the complaint filed on July 9, 2025.

The staff dismissed the first complaint filed on July 9, 2025, in its entirety. The complainant alleged that the committee misrepresented the nature of the transaction with the Grant County Republican Central Committee (GCRPCC) involving a \$1,132.56 transaction that the complainant alleged that was not a donation/contribution and should not have been reported as such. However, in reviewing and talking to the people involved with the transaction in question, including the current treasurer of the GCRPCC, staff concluded that the transaction was reported correctly as a donation/contribution from the GCRPCC to the committee. As such, this allegation has been dismissed as unfounded.

Violations of RCW 42.17A.205, .255, .260, .305, .320 and .335 that were alleged in the second complaint filed on July 16, 2025, were also dismissed as unfounded/lacking sufficient evidence.

Applicable Laws and Rules

- A political committee is required to register with the PDC by filing a *Committee Registration* (C-1pc report). A committee that selects the Full Reporting option on their C-1pc report is required to disclose 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.

- A committee may file monthly C-4 reports, due by the 10th day of the following month, for those months during which they are not participating in an election. The committee may delay the filing of these monthly reports until they have either received contributions or made expenditures that exceed \$750² since the last such report filed. [RCW 42.17A.235\(3\(a\)\)](#) and [WAC 390-05-400](#).
- Per [RCW 42.17A.240\(7\)](#), a committee's C-4 report should disclose, but not be limited to, the name and address of each person to whom an expenditure was made in the aggregate amount of more than \$200³ during the period covered by the report, as well as the amount, date, and purpose of each expenditure. Person, as defined, includes a vendor. An in-kind contribution is disclosed as an expenditure for purposes of campaign accounting and reporting.
- Political advertising as defined in [RCW 42.17A.005\(40\)](#) includes, but is not limited to, mass communication. Mass communication as defined in [WAC 390-05-290](#) includes, but is not limited to, internet websites.
- Pursuant to [RCW 42.17A.320](#), all written political advertising⁴ must include the name and address of the sponsor⁵. Sponsor identification should appear on the first page or fold of the political advertising, be set apart from any other printed matter, and the font size used must be at least the larger of the following: 1) ten percent of the largest type used in the advertisement; or 2) ten-point type.
- [WAC 390-18-010](#) indicates that all political advertising must clearly state that it has been paid for by the sponsor. Additional disclosures may be required, depending on the sponsor and type of advertising used, and [WAC 390-18-030](#) contains additional information regarding sponsor

¹ "Participation" means, 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 or a committee for the purpose of supporting or opposing an election-related matter (e.g. ballot measure); 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate or ballot proposition; or 3) engages in an activity described in .005(38)(c), (d) or (e). [RCW 42.17A.005\(38\)](#).

² Per [WAC 390-05-400](#), this dollar amount increased from \$200 to \$750 effective April 1, 2023.

³ Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

⁴ Political advertising" is a mass communication used to appeal, directly or indirectly, for votes, financial or other support, or opposition to any election campaign that is intended to reach a large audience via a variety of methods. These methods include, but are not limited to, newspaper, radio and TV advertising, signs, billboards, brochures, fliers, and digital communications and online transmissions such as internet websites, social media, emails, and texts. [RCW 42.17A.005\(40\)](#) and [WAC 390-05-290\(3\)](#).

⁵ For the purposes of political advertising, the "sponsor" is the person who paid for the advertising. If a person acts as an agent or is reimbursed for the payment, the original source of the payment is the sponsor.

identification requirements and exemptions for political advertising, and alternatives for online advertising.

Background and Findings

- The respondent registered with the PDC as a continuing committee by filing a C-1pc report in October 2024. The committee selected the Full Reporting option and did not indicate support/opposition to any candidate or ballot measure.
- On August 4, 2025, the Respondent updated its website to include “Paid for by” and the sponsor’s address. The committee indicated that changes to their website were delayed because the volunteer⁶ who maintains their website was out of town for work.
- On August 27, 2025, the committee filed a C-4 report (covering 10/14/24-12/31/24) disclosing an in-kind contribution of \$155.10 from LaWanda Hatch for its domain name registration dated 10/15/24. No other information was disclosed on the Oct-Dec 2024 C-4 report. A monthly C-4 report for October 2024 disclosing the in-kind contribution was due 11/12/24, so that information was disclosed 288 days late.
- On August 26, 2025, the Respondent committee amended one in-kind contribution and one expenditure for “T-shirts” on their June C-4 report to include vendor name and address, and also voluntarily indicated in the descriptions that the T-shirts did not support or oppose any candidate or issue. The Respondent also voluntarily added a description to its May C-4 report on 8/27/25 indicating their campaign signs did not support/oppose any candidate or issue.
- The Respondent provided a written response to the first complaint on 8/27/25 and said they had amended their C-4 reports to include vendor name and address as requested and confirmed that neither their t-shirts nor their signs supported or opposed any candidate or issue. The committee said they are a new PAC and that their domain site took three months to build and was officially launched in January 2025, at which point the PAC was ready to accept contributions and make expenditures. Ms. Hatch chose to make an in-kind contribution rather than request reimbursement because the PAC did not have any funds. The Respondent apologized for the delay in responding, which was caused by a death in the family of one of its Treasurers. The committee indicated they had performed a self-audit in response to the complaint, found some errors, and proceeded to correct them.
- The first complaint alleged that the Respondent had an unreported fee to set up an account with the payment processor Anedot Inc. However, Anedot does not charge a fee for setup or monthly

⁶ The Board Member who maintains the committee’s website is not a professional web designer and was not paid for his time or services. Such “volunteer services” do not need to be reported as in-kind contributions.

fees. Instead, the company charges processing fees for transactions. This allegation is hereby dismissed.

- The committee's monthly C-4 reports for January-August 2025 were all timely filed.
- The Respondent's C-3 reports for deposits made from 1/2/25-9/30/25 were all timely submitted.
- The committee was cooperative throughout our assessment of the complaints, and the Respondent took corrective action as needed.
- The Respondent does not have any previous warnings/violation of PDC requirements.

Summary and Resolution

Noncompliance appears to be the result of good-faith omissions, which is mitigating. Other mitigating factors include: 1) the relatively modest expenditures involved; 2) the relatively small and unsophisticated nature of your committee; and 3) the fact that reports were filed or amended well in advance of the 2025 General Election.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely and accurately disclose an in-kind contribution for your website domain in 2024 and include complete sponsor ID on your website. PDC staff expect you to timely and accurately file all required reports and include complete sponsor ID on political advertising in the future. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff is reminding you about the importance of including complete description details for expenditures and in-kind contributions on C-4 reports, including vendor name and address, in accordance with the PDC laws, rules or guidance.

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 and Erick O. Agina at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

s/
Tabatha Blacksmith
Erick O. Agina
Compliance Officers

Endorsed by,

s/
Peter Frey Lavalley
Executive Director

cc: Andrew Koeppen