

Respondent Names									
Tim Rovik									
Complainant Name									
Miranda Smallwood									
Complaint Description									
District3nksdschoolboard Fri, 31 Oct 2025 at 5:01 PM Nature of the Complaint This complaint concerns an apparent violation of RCW 42.17A.405 , RCW 42.17A.420 , and WAC 390-16-125 , regarding contribution limits and expenditures under “mini-reporting.” Under mini-reporting, a candidate may not: • Accept more than \$500 from any one contributor, and • Spend or receive more than \$7,000 total, including the candidate’s own contributions. Summary of Alleged Violations 1. Exceeding mini-reporting limits by accepting or benefiting from a coordinated in-kind contribution in excess of \$7,000 total. 2. Accepting a contribution over \$500 from one source (the Washington State Republican Party). 3. Failing to amend registration to full reporting prior to accepting the coordinated contribution. 4. Failing to disclose the in-kind contribution as required under RCW 42.17A.235. <table border="1"> <thead> <tr> <th>Alleged Violation</th> <th>Statute/Rule Cited</th> </tr> </thead> <tbody> <tr> <td>Accepting a coordinated in-kind contribution</td> <td>RCW 42.17A.005(15)(a)(ii)</td> </tr> <tr> <td>Exceeding \$500 per-donor contribution limit</td> <td>RCW 42.17A.405; RCW 42.17A.420</td> </tr> <tr> <td>Exceeding \$7,000 total mini-reporting limit</td> <td>RCW 42.17A.420</td> </tr> </tbody> </table>		Alleged Violation	Statute/Rule Cited	Accepting a coordinated in-kind contribution	RCW 42.17A.005(15)(a)(ii)	Exceeding \$500 per-donor contribution limit	RCW 42.17A.405; RCW 42.17A.420	Exceeding \$7,000 total mini-reporting limit	RCW 42.17A.420
Alleged Violation	Statute/Rule Cited								
Accepting a coordinated in-kind contribution	RCW 42.17A.005(15)(a)(ii)								
Exceeding \$500 per-donor contribution limit	RCW 42.17A.405; RCW 42.17A.420								
Exceeding \$7,000 total mini-reporting limit	RCW 42.17A.420								

Failing to amend registration to full reporting	WAC 390-16-125(1)–(3)
Failing to report contribution/expense	RCW 42.17A.235; RCW 42.17A.240
Misreporting or omitting sponsor attribution on mailer	RCW 42.17A.320 (identification of sponsor)
Coordinated mailer not qualifying as “exempt activity”	WAC 390-17-060(4)(a)

Factual Background

1. **Tim Rovik** filed a *C-1 Candidate Registration* selecting **mini-reporting** with the Public Disclosure Commission for the 2025 election for **North Kitsap School District School Board Director, District 3**.
2. In or around **17 October, 2025**, a **mass distribution of postcard campaign mailers** was distributed to approximately **44,000 households**, according to a post on the official campaign Facebook Page “Elect Tim Rovik”, across Kitsap County, promoting the candidacy of **Tim Rovik**.
3. The mailer credits it was **paid for by “The Committee to Elect Tim Rovik”, which is not a registered committee with the PDC**.
4. **The mailer’s postage was paid for by the Washington State Republican Party permit #397**. It is not clearly identified on the mailer that the Washington State Republican Party paid for the postage costs of these mailers. The Washington State Republican Party is not clearly credited on the mailers, but the return address is “WSRP” at the following address: 11911 NE 1st St Ste 201; Bellevue, WA 98005, my research indicates this is the mailing address of the Washington State Republican Party.
5. The content, design, and campaign messaging **mirror language, imagery, and photographs identical to those used on Tim Rovik’s official campaign website and social media accounts**, indicating coordination between the Washington State Republican Party and the candidate, Tim Rovik.
6. The mailer clearly **advocates for the election of Tim Rovik**, making it **express advocacy political advertising** under **RCW 42.17A.005(40)** and **RCW 42.17A.320**.

7. The USPS Every Door Direct Mail program calculates the fair-market cost of producing and mailing 44,000 full-color postcards with postage would exceed **\$10,000**, based on standard commercial printing and postage rates.
8. Because the mailer was coordinated with the Washington State Republican Party, the expenditure constitutes an **in-kind contribution** under **RCW 42.17A.005(15)(a)(ii)** (“contribution” includes “anything of value... made in cooperation, consultation, or concert with, or at the request or suggestion of, the candidate”).
9. The WSRP’s in-kind contribution far exceeds both the **\$500 per-donor limit** and the **\$7,000 total limit** for campaigns using mini-reporting, rendering the campaign out of compliance with **RCW 42.17A.405** and **RCW 42.17A.420**.
10. To date, there is **no public record** of the candidate having amended their C-1 registration to full reporting, nor any **C-3 or C-4 reports** disclosing this in-kind contribution, as required by **RCW 42.17A.235** and **RCW 42.17A.240**.
11. As the opposing candidate, I have not received notification of Tim Rovik’s campaign requesting authorization from the PDC to amend to full reporting, as required by **WAC 390-16-125(1)(c)(i)**, despite this mailer being distributed more than ten days ago.
12. Because the mailer was coordinated with the Washington State Republican Party, the expenditure by the Washington State Republican Party constitutes an **in-kind contribution** to the campaign under **RCW 42.17A.005(30)** (“contribution” includes “anything of value... made in cooperation, consultation, or concert with, or at the request or suggestion of, the candidate or candidate’s authorized committee”).
13. The Washington State Republican Party’s in-kind contribution **far exceeds the \$500 per-donor limit and the \$7,000 total limit** for campaigns using mini-reporting, rendering the campaign **out of compliance with RCW 42.17A**.
14. To date, there is **no public record** of the candidate having amended their C-1 registration to full reporting, nor any C-3 or C-4 reports disclosing this in-kind contribution.
15. As the opposition candidate I have not received any notification of Tim Rovik’s campaign to request permission from the PDC to amend filing status from mini to full reporting, as required, despite this mailer cost occurring over 10-days ago.
16. The “Committee to Elect Tim Rovik” is not registered with the PDC as of 10/30/25.

Applicable Law and Rules

- **RCW 42.17A.005(15)(a)(ii)** – Definition of “contribution” (includes coordinated expenditures).

- **RCW 42.17A.235** – Reporting of contributions and expenditures.
- **RCW 42.17A.240** – Contents of campaign reports (C-3/C-4).
- **RCW 42.17A.405** – Contribution limits for candidates.
- **RCW 42.17A.420** – Expenditure limits under mini-reporting.
- **RCW 42.17A.320** – Identification of sponsors in political advertising.
- **WAC 390-16-125** – Mini campaign reporting—exceeding limitations (requirement to amend to full reporting before exceeding limits).
- **WAC 390-17-060(4)(a)** – Exempt contributions do not include coordinated expenditures with a candidate.

What impact does the alleged violation(s) have on the public?

The alleged violations undermine the public’s right to transparency and fairness in elections, which is the foundational purpose of RCW 42.17A.001. By coordinating with a state political party to distribute a \$10,000+ mailer while claiming “mini-reporting” status, the campaign effectively concealed the true sources and magnitude of its financial support from voters.

This creates several specific harms:

Deprives voters of full disclosure — The public cannot accurately evaluate who is financing or influencing the candidate’s campaign, contrary to the intent of RCW 42.17A.001(1) and (10).

Distorts campaign fairness — Mini-reporting is intended for low-cost, grassroots campaigns. Accepting an unreported, coordinated in-kind contribution of this scale gives one candidate a significant, undisclosed financial advantage over others who comply with the law.

Erodes public confidence in elections — The appearance that campaign finance laws can be ignored without consequence reduces trust in both local elections and the integrity of the Public Disclosure Commission’s oversight.

Prevents accountability — Without timely disclosure or amendment to full reporting, the public, media, and opposing candidates lose the ability to verify compliance before ballots are cast.

In sum, the coordination and failure to disclose frustrate the very purpose of Washington’s public disclosure laws — to assure voters that elections are honest, transparent, and fair.

List of attached evidence or contact information where evidence may be found

Photos/scans of the mailed postcard (front and back).

Screenshots from Tim Rovik’s campaign website and social media accounts showing identical language and imagery.

Copy of Tim Rovik’s PDC C-1 registration showing mini-reporting selection.

Publicly available data confirming WSRP’s permit and address.

Cost estimates from commercial printing/mailing services for 44,000-piece mailers.

Contact: Miranda Smallwood, district3nksdschoolboard@mirandajoysmallwood.com

List of potential witnesses with contact information to reach them

No witnesses to report. Evidence obtained from publicly available information.

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.

PDC COMPLAINT

To:

Washington State Public Disclosure Commission
compliance@pdc.wa.gov

Subject: Formal Complaint – Alleged Violation of RCW 42.17A and WAC 390-16-125 by
Candidate Using Mini-Reporting in Coordination with Party Mailer

Respondent Information

Candidate: Tim Rovik

Office Sought: North Kitsap School District Board of Directors, District 3

Campaign Committee (if any): Committee to Elect Tim Rovik **[not a registered committee, but this is the title on other campaign materials]**

Political Party Involved: Washington State Republican Party

Nature of the Complaint

This complaint concerns an apparent violation of **RCW 42.17A.405**, **RCW 42.17A.420**, and **WAC 390-16-125**, regarding contribution limits and expenditures under “mini-reporting.”

Under mini-reporting, a candidate may not:

- **Accept more than \$500 from any one contributor**, and
- **Spend or receive more than \$7,000 total**, including the candidate’s own contributions.

Alleged Violation	Statute/Rule Cited
Accepting a coordinated in-kind contribution	RCW 42.17A.005(15)(a)(ii)
Exceeding \$500 per-donor contribution limit	RCW 42.17A.405; RCW 42.17A.420
Exceeding \$7,000 total mini-reporting limit	RCW 42.17A.420

Failing to amend registration to full reporting	WAC 390-16-125(1)–(3)
Failing to report contribution/expenditure	RCW 42.17A.235; RCW 42.17A.240
Misreporting or omitting sponsor attribution on mailer	RCW 42.17A.320 (identification of sponsor)
Coordinated mailer not qualifying as “exempt activity”	WAC 390-17-060(4)(a)

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9. The WSRP’s in-kind contribution far exceeds both the **\$500 per-donor limit** and the **\$7,000 total limit** for campaigns using mini-reporting, rendering the campaign out of compliance with **RCW 42.17A.405** and **RCW 42.17A.420**.
10. To date, there is **no public record** of the candidate having amended their C-1 registration to full reporting, nor any **C-3 or C-4 reports** disclosing this in-kind contribution, as required by **RCW 42.17A.235** and **RCW 42.17A.240**.
11. As the opposing candidate, I have not received notification of Tim Rovik’s campaign requesting authorization from the PDC to amend to full reporting, as required by **WAC 390-16-125(1)(c)(i)**, despite this mailer being distributed more than ten days ago.
12. Because the mailer was coordinated with the Washington State Republican Party, the expenditure by the Washington State Republican Party constitutes an **in-kind contribution** to the campaign under **RCW 42.17A.005(30)** (“contribution” includes “anything of value... made in cooperation, consultation, or concert with, or at the request or suggestion of, the candidate or candidate’s authorized committee”).
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Applicable Law and Rules

- **RCW 42.17A.005(15)(a)(ii)** – Definition of “contribution” (includes coordinated expenditures).
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- **RCW 42.17A.240** – Contents of campaign reports (C-3/C-4).

- **RCW 42.17A.405** – Contribution limits for candidates.
- **RCW 42.17A.420** – Expenditure limits under mini-reporting.
- **RCW 42.17A.320** – Identification of sponsors in political advertising.
- **WAC 390-16-125** – Mini campaign reporting—exceeding limitations (requirement to amend to full reporting before exceeding limits).
- **WAC 390-17-060(4)(a)** – Exempt contributions do not include coordinated expenditures with a candidate.

Summary of Alleged Violations

1. **Exceeding mini-reporting limits** by accepting or benefiting from a coordinated in-kind contribution in excess of \$7,000 total.
2. **Accepting a contribution over \$500** from one source (the Washington State Republican Party).
3. **Failing to amend registration to full reporting** prior to accepting the coordinated contribution.
4. **Failing to disclose** the in-kind contribution as required under RCW 42.17A.235.

Evidence and Documentation

I can provide:

- Photos/scans of the mailed postcard (front and back).
- Screenshots from Tim Rovik's campaign website and social media accounts showing identical language and imagery.
- Copy of Tim Rovik's PDC C-1 registration showing mini-reporting selection.
- Publicly available data confirming WSRP's permit and address.
- Cost estimates from commercial printing/mailing services for 44,000-piece mailers.

Requested Action

I respectfully request that the Public Disclosure Commission:

1. **Investigate** the apparent coordination between Tim Rovik's campaign and the Washington State Republican Party regarding the 44,000-piece postcard mailer.
2. **Determine** whether the value of this mailer constitutes an in-kind contribution that violates contribution and expenditure limits for mini-reporting.

3. **Require corrective action**, including amending to full reporting and disclosing the contribution, or impose appropriate enforcement or penalties as warranted under RCW 42.17A.

Relevant RCW Sections

1. **RCW 42.17A.005(15)(a)(ii) – Definition of “contribution”**
Defines a *contribution* to include “an expenditure made by a person in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate or candidate’s authorized committee”.
→ **Allegation:** The Washington State Republican Party’s expenditure for the mailer constitutes an *in-kind contribution* because it was coordinated with the candidate.
2. **RCW 42.17A.235 – Reporting of contributions and expenditures**
Requires that all contributions (including in-kind) and expenditures be reported by campaigns using full reporting.
→ **Allegation:** The candidate failed to report the in-kind contribution from the state party.
3. **RCW 42.17A.240 – Contents of report**
Specifies what must be disclosed in C-3 and C-4 filings, including the source, amount, and nature of contributions.
→ **Allegation:** No report was filed disclosing this contribution.
4. **RCW 42.17A.405 – Campaign contribution limits and exemptions**
Sets contribution limits and authorizes the PDC to set caps for candidates using mini-reporting (currently \$500 per contributor).
→ **Allegation:** Accepting a \$10,000-plus in-kind mailer from one source exceeds both the \$500 per-donor limit and \$7,000 aggregate limit under mini-reporting.
5. **RCW 42.17A.420 – Expenditure limitations under mini-reporting**
States that campaigns using the mini-reporting option may not receive or spend more than \$7,000 in total and no more than \$500 from a single contributor.
→ **Allegation:** The coordinated mailer exceeds those limits.
6. **RCW 42.17A.750 / RCW 42.17A.755 – Civil remedies, sanctions, and enforcement**
Authorizes the PDC to investigate and penalize violations.
→ **Applicable** to any enforcement action requested.

Relevant WAC Sections

1. **WAC 390-16-125 – Mini campaign reporting—Exceeding limitations**
Requires a candidate to apply to the PDC for authorization to change from mini to full reporting *before* exceeding the mini-reporting limits, and to notify opponents in writing.

→ **Allegation:** The candidate did not file for authorization to change reporting status despite exceeding limits, nor provide required notice to other candidates.

2. **WAC 390-17-060** – *Exempt contributions and activities*

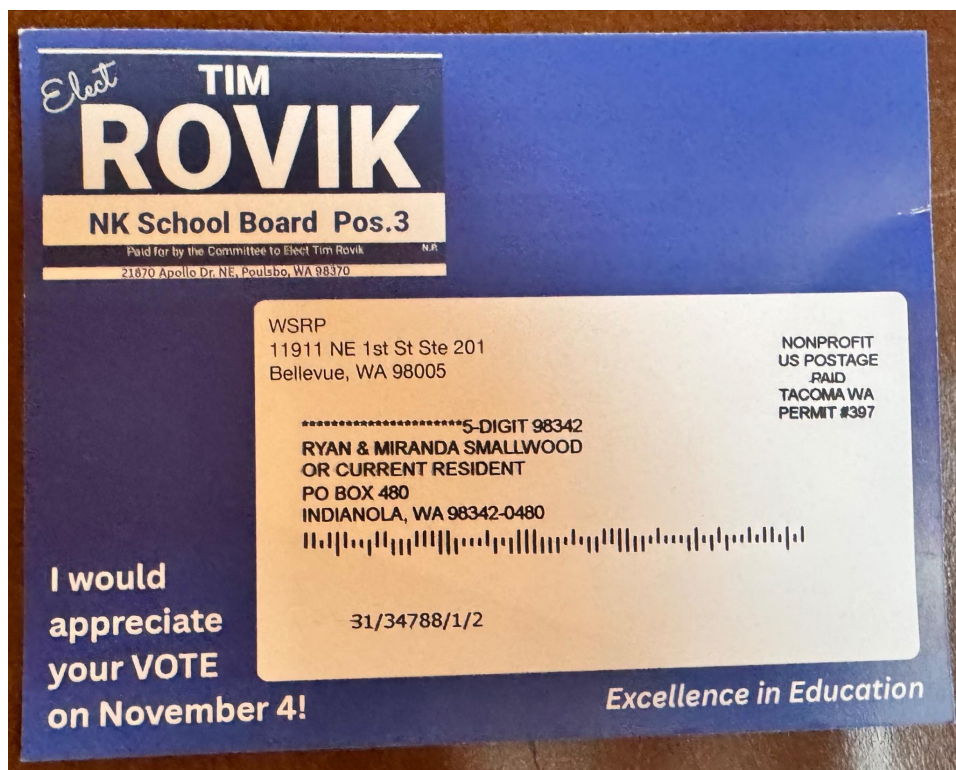
Clarifies that expenditures made in cooperation, consultation, or concert with a candidate *do not qualify as exempt activities* and are treated as contributions subject to limits.

→ **Allegation:** The state party's mailer, coordinated with the candidate, is not exempt and counts toward contribution limits.

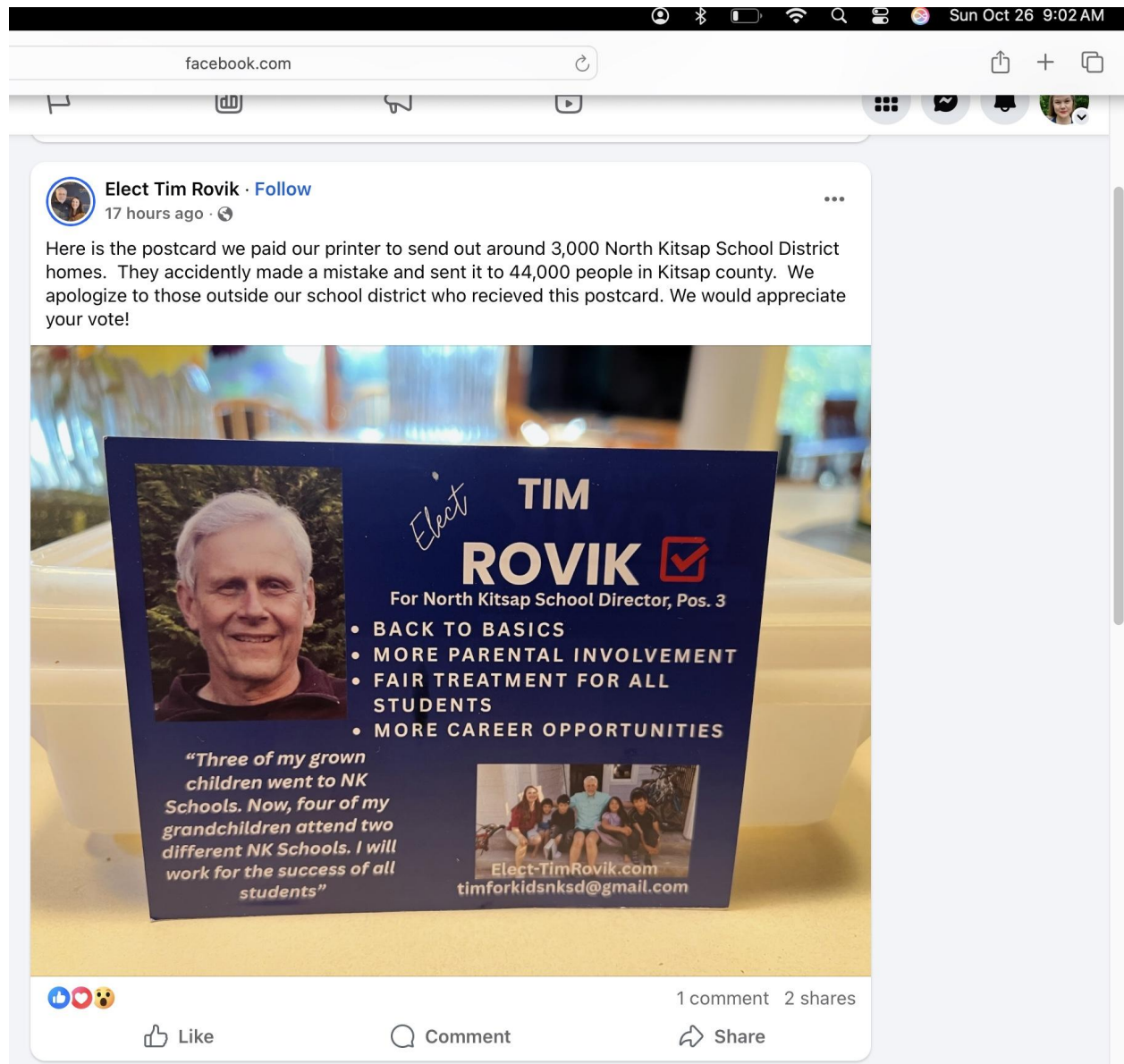
3. **WAC 390-05-210** – *cross-referenced in WAC 390-17-060*

Defines "coordination" for purposes of determining when an expenditure becomes a contribution.

Postcard Mailer, Front and Back:



Screenshots from Official Campaign Facebook Account Regarding Mailer and statement of 44,000 total postcards distributed; also confirming coordination with campaign:



Screenshots from official campaign facebook page and website with campaign imagery and talking points, confirming coordination with mailer:

**Elect Tim Rovik** created an **event**.
October 8 at 8:34 PM · 🌐



Sat, Oct 11

Doorbelling

98370

1 person went

☆ Interested

👍 6

👍 Like

💬 Comment



Comment as Smallwood for School Board

🗨️ 😊 📷 GIF 🗑️



TIM ROVIK
FOR
NORTH KITSAP SCHOOL
DISTRICT
SCHOOL BOARD DIRECTOR

**MY NAME IS TIM ROVIK. I AM RUNNING
FOR NORTH KITSAP SCHOOL BOARD
DIRECTOR, POSITION 3.**

I am ready to lead:

- Getting Back to the Basics
- Fair Treatment for All Students
- More Parental Involvement
- Community Support in Education

ELECT TIM ROVIK

NORTH KITSAP SCHOOL DISTRICT BOARD DIRECTOR
POSITION 3



timforkidsnksd@gmail.com

Like us on our

f
Facebook
page

Paid for by the committee to elect Tim
Rovik

PDC Declaration of Mini-Reporting:

Timothy L Rovik

Candidate for SCHOOL DIRECTOR for NORTH KITSAP SD 400 in the 2025 election.

- Overview**
- [Contributions](#)
- [Expenditures](#)
- [Pledges](#)
- [Debts](#)
- [Loans](#)
- [Independent Expenditures](#)

Candidate Overview

- Registered May 22, 2025
- Candidate opted for **mini reporting**

21870 apollo dr ne
Poulsbo, WA 98370
✉ timforkidsnksd@gmail.com

Candidacy Status

- ↳ Candidate declared (5/9/2025)
- ↳ Candidate registered (5/22/2025)
- ↳ Qualified for general

Financial Overview

Candidate opted for **mini reporting** ⓘ

\$0.00 + **\$0.00** + **\$0.00** = **\$0.00**
Starting balance Contributions Loans Total raised

\$0.00 **\$0.00** **\$0.00**
Total spent Pledges Debt

\$0.00 **\$0.00**
Independent expenditures for Independent expenditures against

Candidate Reports and Forms

- [Registration Form](#)
- [Surplus Funds Account](#)
- [Financial Affairs Report](#)

Estimated Cost of Postage for Postcard Mailers using “Every Day Direct Mail” current rates:

- Stated intention of mailing 3,000 postcards = $\$0.247 \times 3,000 = \741
(postage only), vs.
- Actual number of postcards mailed = 44,000 = $\$0.247 \times 44,000 = \$10,868$
(postage only)

Step 1: Search for Routes

Use the EDDM® Online Tool to search for neighborhoods where your customers live. Then, use the filters to target customers by specific demographics such as age, household size, and income.

Search for Routes

98370

Search

Clear

Mailpiece Size Checker

Target Audience

View as: Map Table

☒	Route	Residential	Total	Age: 25-85+	Size	Income	Cost
☒	98370-PBOX	—	1514	— %	—	—	\$373.96

Order Summary

Selected Routes

1

[Post Office™ Drop-Offs](#)

1

Total Mailpieces

1514

Current EDDM Rate

Cost per mailpiece is \$0.247.

Next Step

Clear Routes

PDC Absence of “Independent Expenditures” itemized for mailers, “No independent expenditures found for this candidate during this election year”:

ari File Edit View History Bookmarks Window Help

pdcc.wa.gov

Campaign Finance Meta Business Suite Candidates | Washington State Public Disclosure Timothy L. Rovik - 2025 | Washington State... Untitled document - Google Docs

Candidate for SCHOOL DIRECTOR for NORTH KITSAP SD 400 in the 2025 election.

[Overview](#) [Contributions](#) [Expenditures](#) [Pledges](#) [Debts](#) [Loans](#) **[Independent Expenditures](#)**

No independent expenditures found for this candidate during this election year.

Results for: **No selected filters.** [^ Hide Filters](#) [Search Tips](#)

Sponsor Name X **Amount** X **For/Against** X

Show entries

[Download 0 rows as CSV.](#)

Name	Date	Amount	For/Against	Itemized Expenditures
No data available in table				

Showing 0 to 0 of 0 entries

[Previous](#) [Next](#)

Absence of a registered committee for “Committee to Elect Tim Rovik”:

Home > Political Disclosure Data > Committees

Candidates

Committees

Lobbying

Independent Expenditures

Surplus Funds

Financial Statements

Results for:

Committee Name: Committee to Elect Tim Rovik X

Hide Filters

Search Tips

Committee Name

Committee to Elect Tim RovikX

Committee Category

SelectX

Election Year

SelectX

Jurisdiction

Enter textX

County

Enter textX

Ballot Prop. Number

Enter textX

Show25entries

[Download 0 rows as CSV.](#)

Name

Election Year

Committee Category

Raised

Spent

Debt

County

Jurisdiction

Ballot Prop.

No matching records found

Showing 0 to 0 of 0 entries (filtered from 19,023 total entries)

Previous

Next