



**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.pdcc.wa.gov

October 5, 2021

Delivered electronically to sarah@clallamrepublicans.org

Subject: PDC Case 97535

Dear Republican Women of Clallam County:

Below is a copy of an electronic letter sent to Lisa Ann Dekker concerning a complaint filed August 13, 2021 with the Public Disclosure Commission (PDC), alleging a violation of RCW 42.17A.205 for failing to register as a committee for the 2018 and 2020 elections.

Based on PDC staff's review of the complaint and: (1) contributions made for prior elections, (2) the structure, (3) mission and goals of the organization, and (4) the overall budget of the organization, staff reminds the Republican Women of Clallam County to evaluate its planned 2021 activities to determine if the RWCC must register as a political committee.

Staff advises you to consult [PDC Interpretation 07-02](#). This interpretation provides guidance to the public and regulated community regarding whether an entity's campaign activity, in consideration of its stated purpose and other activity, meets the threshold of the primary purpose test and corresponding requirements to register as a political committee.

If the RWCC meets the requirements as found in PDC Interpretation 07-02, PDC staff reminds you about the importance of timely registering as a political committee with the PDC and staff will expect in the future you to timely and accurately register as a political committee in accordance with PDC laws, rules and PDC Interpretation 07-02.

As noted in the letter below, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into the allegations or take further enforcement action in this matter.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Kim Bradford
Deputy Director
For Peter Lavallee
Executive Director



**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

October 5, 2021

Delivered electronically to dekkerla@gmail.com

Subject: Complaint regarding Republican Women of Clallam County, PDC Case 97535

Dear Lisa Ann Dekker:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed August 13, 2021. The complaint alleged the Republican Women of Clallam County violated RCW 42.17A.205 by failing to register as a committee for the 2018 and 2020 elections.

PDC staff reviewed the allegations and attached complaint documents; the applicable statutes, rules, and reporting requirements; the applicable PDC reports; a response from Sarah Kincaid, President, Republican Women of Clallam County; and online documents concerning the Republican Women of Clallam County, to determine whether the record supports a finding of one or more violations.

We found:

- Based on PDC contribution and expenditure records and databases, the Republican Women of Clallam County (RWCC) have made monetary contributions, dating back to 2010, to candidates seeking legislative and local offices, and political committees. The documents and record reviewed show that RWCC made the following: (1) a \$550 monetary contribution to one candidate in 2015; (2) three \$200 monetary contributions to three candidates in 2016; (3) a \$200 monetary contribution to a political party committee in 2017; (4) a \$600 monetary contribution and a \$300 monetary contribution to two candidates in 2018; (5) \$310 in monetary contributions to a political party committee in 2019; and (6) \$500 monetary contributions to two candidates in 2020.
- In response to an inquiry from PDC staff, Kincaid stated the RWCC plan to contribute \$200 during the 2021 election cycle.
- Kincaid also stated that RWCC is a social club, with annual dues, but that the club also receives funds from “an occasional raffle at monthly meetings and a donation jar used to augment our shoe box fund.”

- Kincaid also reported the RWCC has no formal budget process and does not solicit contributions from members for contributions to candidates or for other political activities. She stated the 2020 total expenditures, for all club activities, was \$1,350.
- On its website, the RWCC states it is “Chartered Under The By-Laws of The Washington Federation of Republican Women (www.wfrw.org) and The National Federation of Republican Women (www.nfrw.org). The mission of the Republican Women of Clallam County is to:
 - promote an informed electorate through political participation, education and activities;
 - increase the effectiveness of women in the cause of good government through active political participation;
 - recruit and promote qualified women and men for all elective offices – local, state and national;
 - facilitate cooperation among the National and State Federations of Republican Women’s organizations;
 - promote loyalty to the Republican Party and its principles and work for the election of Republican candidates; and
 - support the objectives and policies of the Republican National Committee and the Washington State Republican Party.

Washington law defines a political committee as any person, group, club, organization, or collection of individuals (except a candidate or individual dealing with his or her own funds) expecting to receive contributions or make expenditures in support of or in opposition to any candidate or ballot proposition. While an organization may be a civic, social, or professional organization primarily, it also may be a political committee if it solicits or receives contributions for the purpose of use in election campaigns or otherwise meets the primary purpose tests outlined in PDC Interpretation 07-02.

The Commission adopted PDC Interpretation 07-02 to provide guidance concerning how the PDC applies the “primary purpose test” for determining a political committee as set forth by court decisions. The Interpretation provides guidance in determining whether an entity that participates in elections by making campaign contributions, but whose campaign activities are only one prong or aspect of an organization’s overall work, is required to register and file reports with the PDC as a “political committee.”

Based on these findings, PDC staff has determined that, in this instance, the failure to register as a committee and report contributions and expenditures during calendar years 2018 and 2020, does not amount to a violation warranting further investigation.

Staff is reminding the RWCC to review PDC Interpretation 07-02 and evaluate if ongoing election activity meets the primary purpose test to register as a political committee.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at fdc@fdc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Kim Bradford
Deputy Director
For Peter Lavalley
Executive Director