**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**

***NOTE:*** ***On Jan. 1, 2026, Chapter 42.17A was recodified to Title 29B RCW***

May 29, 2026

Delivered electronically to castilloc@ballardspahr.com; chavezs@ballardspahr.com; dan@danbradylaw.com

Subject: PDC Case 140213 regarding Let's Go Washington, Sponsored by Brian Heywood Re: Alleged violations Not Adjudicated by the Commission at its October 3, 2024, enforcement hearing

Callie A. Castillo and Stephanie Chavez, Ballard Spahr LLP; Dan Brady, Dan Brady Law

The Public Disclosure Commission (PDC) completed its review of the complaints filed by Abby Lawlor and Dmitri Iglitzin, Counsel for Heather Weiner, on July 19, 2023 and August 24, 2023 (Complaint 1 and addendum to Complaint 1); as counsel for SEIU 775, Civic Ventures, Washington Conservation Action, and Planned Parenthood Alliance Advocates on October 17, 2023 (Complaint 2); and as counsel for Defend Washington on August 15, 2024 (Complaint 3). The complaints alleged violations of:

Complaint 1: Alleged that Let's Go Washington, Sponsored by Brian Heywood (LGW), a 2022 and 2023 political committee, violated RCW 42.17A.235 and .240 by failing to timely and accurately file C-4 reports disclosing in-kind contribution details for expenditures and which initiatives were being supported; and (2) RCW 42.17A.435 by concealing the identity of a vendor for expenditures and for some in-kind contributions received from Brian Heywood.

Complaint 1 (Addendum): Alleged that Let's Go Washington, Sponsored by Brian Heywood, violated RCW 42.17A.235 and .240 and Brian Heywood violated RCW 42.17A.205 because they:

1. Failed to adequately report the ballot propositions supported by specific in-kind expenditures;
2. Failed to adequately report work performed by Research Mom Consulting Services;
3. Failed to adequately report work performed by TDM Strategies;
4. Failed to adequately report planned spending; and
5. Sponsored multiple committees supporting the same ballot proposition.

Complaint 2: Alleged that Let's Go Washington, Sponsored by Brian Heywood, violated RCW 42.17A.235 and .240 because it:

1. Failed to report a pledge from Brian Heywood to cover for a $3.6 million debt for a signature-gathering contract with Your Choice Petitions, LLC;

2. Filed inaccurate and misleading reports of a second signature-gathering firm, TDM Strategies, LLC.
3. Failed to report significant expenditures for a September 13, 2023, gas discount event that benefited the LGW campaign;
4. Failed to report the value of three video-recorded interviews produced by We the Governed that benefited LGW; and
5. Failed to properly report expenditure details by failing to include the full name and address for payments to Palmer K. for wages.

Complaint 3: Alleged that Let's Go Washington, Sponsored by Brian Heywood, violated RCW 42.17A.235 and .240 and WAC 390-32-030(2), The Fair Campaign Practices Code, because it:

1. Failed to report the expenditure or contribution on its August 12, 2024, C-4 report for a gas discount event that benefited the LGW campaign; and
2. Violated the Fair Campaign Practices Code, WAC 390-32-010(6), because it offered financial incentives, such as a discount on gas and food, to voters to encourage them to sign and vote for initiatives.

Applicable Laws and Rules

**RCW 42.17A.235 and .240:** A committee that selects the Full Reporting option on its C-1pc Committee Registration is required to report contributions and expenditures to the PDC on C-3 and C-4 reports pursuant to RCW 42.17A.235 and RCW 42.17A.240. The due dates for these reports are based upon the election cycle, the committee's election participation, and their financial activity. These reports must include the name and address of each person who has made one or more contributions during the period, together with the money or in-kind value, the date of each contribution, and the aggregate value of all contributions received from each person during the campaign, or in the case of a continuing political committee, the current calendar year, with certain exceptions. In-kind contributions must include a description of the contribution, including, in most cases, the name and address of vendors where contributed goods or services were purchased and, if applicable, the same information for subvendors used by vendors.

**WAC 390-16-037** requires political committees to disclose the purpose of expenditures reported under RCW 42.17A.240, including the name of any candidate supported or opposed by the expenditure, and the details of goods and services to be provided by the recipient of the expenditure.

Background and Findings

- On October 3, 2024, an enforcement hearing was held before the full Commission. At the hearing, the PDC alleged four categories of violations: 1) failure to timely and accurately report its expenditures in violation of RCW 42.17A.235 and .240; 2) failure to timely report expenditures of subvendors in violation of RCW 42.17A.235 and .240, WAC 390-16-037 and WAC 390-16-205; 3) failure to timely provide its Books of Account to the PDC in violation of RCW 42.17A.235 and WAC 390-16-043(9); and 4) failure to preserve Books of Account to substantiate subvendor expenditures in violation of RCW 42.17A.235(8). The Respondent had no prior PDC violations.
- The Commission found:

- LGW properly reported the allocation of its expenditures under RCW 42.17A.235 and .240, and WAC 390-16-037 under PDC rules in effect at the time of filing and there was no violation for failure to allocate expenditures under RCW 42.17A.235 and .240.
- LGW failed to report expenditures of subvendors as required by RCW 42.17A.235 and .240, WAC 390-16-037 and WAC 390-16-205 and violated WAC 390-16-205.
- LGW failed to timely provide its books of account to the PDC as required by RCW 42.17A.235 and WAC 390-16-043(9) and violated RCW 42.17A.235 and WAC 390-16-043(9).
- LGW preserved its Books of Account and did not violate RCW 42.17A.235(8).

- The Commission issued monetary penalties for the two violations it found. LGW filed a petition for Reconsideration with the PDC and later appealed the Final Order to Superior Court. Currently, the matter remains on appeal within the Washington state court system.

- Concerning the allegation that Brian Heywood was sponsoring multiple committees supporting the same ballot proposition in violation of RCW 42.17A.205(5), attorney Dan Brady, representing LGW and Brian Heywood, stated, in a response to staff questions, "Let's Go Washington will remain supporting all the measures, and the other two committees, Taxpayers Accountability Alliance and Safer Streets for All, will be closed within a few days. My understanding is that those other two committees did little or no work for the measures, but that will be clarified as well."

- Staff found that Safer Streets for All Sponsored by Brian Heywood and Taxpayers Accountability Alliance Sponsored by Brian Heywood closed in 2023 without engaging in activities supporting the initiatives being supported by LGW Sponsored by Brian Heywood. Amended C-4 Reports have been filed for July and August 2023 for Safer Streets for All and Taxpayers Accountability Alliance to clarify that signature gathering activities initially attributed to these committees should have been attributed to LGW and were ultimately paid for by LGW.

- Concerning the allegation that the Committee failed to report a pledge from Brian Heywood for a $3.6 million debt for a signature-gathering contract with Your Choice Petitions, LLC (YCP), PDC staff found that the $3.6 million contract was between YCP and Let's Go Washington and it required the payment of a $400,000 non-refundable deposit upon execution of the contract to be applied to the $3.6 million obligation to pay up to $600,000 for 200,000 signatures for six separate initiatives. The contract did not include a guarantee of payment from Brian Heywood.

- Concerning the second signature-gathering firm, TDM Strategies, LLC, the complaint alleged that given TDM's recent formation and the fact that Heywood was one of its two governors, "it seems probable that Heywood has personally provided the funds necessary for the company to remain in operation while six-figure debts from Let's Go WA are still outstanding. Any transfers of money from Heywood to TDM Strategies to pay the wages of signature collectors or other nondeferrable expenses should have either been reported as in-kind contributions to the Committee from Heywood or as in-kind loans. By reporting them as debts to TDM Strategies, Let's Go WA has likely failed to disclose Heywood's ongoing role in keeping TDM Strategies' signature gathering operation afloat and underreported Heywood's total contributions to the Committee to date." PDC staff also notes that much of the debt owed to TDM was reported as forgiven in 2025. The complaint raises a reasonable question about the relationship between the committee and the vendor, and the ability of TDM to provide signature-gathering activities to

LGW. Such an analysis would require further investigation. Even if that inquiry established that Heywood had made additional in-kinds to the committee, it would not have significantly added to the public's understanding that he was the main backer of the work being done by a committee for which he was the principal officer and sponsor.

- Concerning the September 13, 2023 "gas station event," Brady confirmed that LGW did not help plan the event and was not made aware of it until a few days before it occurred but did later report an in-kind contribution from the event for the cost of the gas discounts.

- Concerning discounts given at other "gas station events" in support of I-2117 held July 29, 2024, August 9, 2024, August 21, 2024, August 27, 2024, and August 29, 2024, and for the discount given to people purchasing burgers at an August 17, 2024 event at Headworks Brewing in Enumclaw, expenses were reported on the August and September 2024 C-4 reports. The committee's lack of expenditure detail and subvendor reporting were key issues in the October 2024 hearing before the Commission, albeit for other reports filed by the Committee. Given that the September and October 2024 C-4 reports were filed prior to or in proximity to that hearing, PDC staff is not pursuing these additional instances of possible reporting deficiencies.

- Concerning the "We the Governed" interviews, Brady stated that Glen Morgan and his organization, We the Governed, has for years published countless media stories in writing, audio, and video formats about various political activities. Brady said LGW did not pay for any of the interviews conducted by We the Governed and was not contacted by We the Governed that an in-kind contribution was intended. He said LGW, on its own, simply imbedded the interviews on its website, as allowed by anyone.

- Concerning the allegation that LGW violated the Fair Campaign Practices Code, WAC 390-32-010(6), which states, "I shall not practice, and I shall condemn practices, which tend to corrupt or undermine the system of free election or which hamper or prevent the free expression of the will of the voters," by offering financial incentives, such as a discount on gas and food, to voters to encourage them to sign and vote for initiatives, PDC staff noted that WAC 390-32-020(2) states that failure to subscribe to the Code shall not constitute a violation of RCW 42.17A or Title 29B and declined to take any action concerning the alleged violation.

Summary and Resolution

Concerning the alleged violations described above that were not brought to the Commission during the October 3, 2024, enforcement hearing, 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 may have 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 the alleged violations not heard by the Commission at its October 3, 2024, enforcement hearing, in accordance with RCW 29B.60.020(1).

If you have questions, contact Phil Stutzman at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

*Electronically signed by Phil Stutzman*
Phil Stutzman
Compliance Officer

Endorsed by,

*Electronically signed by Kim Bradford*
Kim Bradford
Deputy Director
For Peter Frey Lavallee
Executive Director

cc: Abby Lawlor and Dmitri Iglitzin, Counsel for Heather Weiner, SEIU 775, Civic Ventures, Washington Conservation Action, Planned Parenthood Alliance Advocates, and Defend Washington