



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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**BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON**

In the Matter of Enforcement Action
Against

Committee to Elect Rylee Fleury

Respondent.

PDC Case No. 158645

Amended Notice of
Administrative Charges

I. JURISDICTION

The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure laws; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC.

II. ALLEGATION(S)

PDC Staff (Staff) alleges that, during election year 2024, Respondent the Committee to Elect Rylee Fleury (the Committee) violated RCW 42.17A.235, RCW 42.17A.240, RCW 42.17A.145, WAC 390-16-037, WAC 390-16-207 and WAC 390-05-210(3), by: (1) failing to timely file *Cash Receipts, Monetary Contribution (C-3)* reports; (2) in advance of the 2024 primary election, failing to timely file mandatory 21-day, 7-day, and post-primary *Receipts & Expenditure Summary (C-4)* reports; (3) in advance of the 2024 general election, failing to timely file mandatory 21-day, 7-day, post-general, and end-of-election C-4 reports; (4) failing to report the full purpose of expenditures; (5) failing to report in-kind contributions; and (6) filing false C-4 reports.

Staff also alleges that, during election year 2024, the Committee violated RCW 42.17A.405(2) and WAC 390-16-310(4) by accepting over-limit contributions.

Finally, Staff alleges that, during election year 2024, the Committee violated RCW 42.17A.320 and WAC 390-18-010 by failing to include sponsor identification on political advertisements (POLADs).

III. FACTS

- On May 24, 2024, Respondent Rylee Fleury registered the Committee with the PDC. On June 3, 2024, Mr. Fleury amended the registration to reflect that he was the candidate, the Committee’s name was changed, and he added Larry R. Jensen as the Assistant and Ministerial Treasurer. The Committee’s purpose was to support Mr. Fleury’s campaign for County Commissioner, Position 1, in Skagit County. The registration also identified Tim Garrison as the Treasurer, but throughout the campaign and investigation Mr. Garrison never communicated with Staff nor did he file any of the C-3 and C-4 reports. Mr. Jensen and Mr. Fleury were the primary contacts for the Committee with Mr. Jensen submitting all the campaign reporting and being the person that Staff worked with during the investigation. The Committee reported \$31,541,87 in contributions raised during the period from May 9, 2024, through May 12, 2025, and expended \$29,339.15 during the period from May 10, 2024, through May 12, 2025. Mr. Fleury lost in the 2024 general election.

Late filed C-3 and C-4 Reports during the Primary Election Period

- Starting in June 2024, weekly C-3 reports were due for deposits made in the prior week. The following C-3 reports, for the primary election period, were submitted late:

- June

Report #	Deposit Date	Rpt Due Date	Rpt Submit Date	Total Funds Rcv'd
110234711	6/20/24	6/24/24	7/31/24	\$23
110234713	6/20/24	6/24/24	7/21/24	\$50
110234709	6/25/24	7/01/24	7/31/24	\$500
110234710	6/25/24	7/01/24	7/31/24	\$200
			TOTAL	\$773

- July

Report #	Deposit Date	Rpt Due Date	Rpt Submit Date	Total Funds Rcv'd
110234708	7/01/24	7/08/24	7/31/24	\$700
110234707	7/03/24	7/08/24	7/31/24	\$310

110234705	7/10/24	7/15/24	7/31/24	\$500
110234704	7/11/24	7/15/24	7/31/24	\$150
110234701	7/17/24	7/22/24	7/31/24	\$39
110234702	7/17/24	7/22/24	7/31/24	\$2,000
110251160	7/27/24	7/29/24	10/12/24	\$343.96
110283617	7/31/24	8/5/24	5/9/25	\$300
			TOTAL	\$4,342.96

- A C-3 for contributions deposited on July 31, 2024, was originally submitted timely but, later amended on August 1, 2024, and then amended again on May 5, 2025.

Report #	Total Funds Rcv'd
Original 110234700	\$1,205
amended by 110235013	\$1,055
2 nd amendment 110283622	\$755

- A C-3 report (#110251156) for deposits on August 28, 2024, due September 2, 2024, was submitted six weeks late on October 12, 2024. This C-3 reported \$5,165 in contributions received.

3. The following mandatory C-4 reports, for the primary election period, were submitted late:

- The 21-Day C-4 report for the period June 1 to July 15, 2024, was due on July 16, 2024. It was submitted fifteen days late on July 31, 2024. The report, #110234714, identified \$4,143 in receipts and \$4,004 in expenditures.
- The 7-Day C-4 report for the period July 16 to July 29, 2024, was due on July 30, 2024. It was submitted one day late on July 31, 2024. The report, #110234699, identified \$2,039 in receipts and \$2,136.79 in expenditures.
- The Post-Primary C-4 report for the period July 30 to August 31, 2024, was due August 30, 2024. It was submitted six weeks late on October 12, 2024. The report, #110251164, identified \$6,520 in receipts and \$1,511.65 in expenditures.

Late filed C-3 and C-4 Reports during the General Election Period

4. The following C-3 reports, for the general election period, were submitted late:

- October

Report #	Deposit Date	Rpt Due Date	Rpt Submit Date	Total Funds Rcv'd
110251155	10/01/24	10/07/24	10/12/24	\$2,540
110251161	10/03/24	10/07/24	10/12/24	\$120
110251162	10/03/24	10/07/24	10/12/24	\$125
110251157	10/04/24	10/07/24	10/12/24	\$2,400
110251158	10/04/24	10/07/24	10/12/24	\$2,400
110259225	10/21/24	10/28/24	11/06/24	\$50
110283177	10/21/24	10/28/24	05/07/25	\$200
110283193	10/21/24	10/28/24	05/07/25	\$200
			TOTAL	\$8,035

- November

Report #	Deposit Date	Rpt Due Date	Rpt Submit Date	Total Funds Rcv'd
110283179	11/04/24	11/11/24	5/07/25	\$1,200
110283197	11/04/24	11/11/24	5/07/25	\$1,300
			TOTAL	\$2,500

- A C-3 report (#110284452) for a deposit on December 23, 2024, due January 10, 2025, was submitted 4 months late on May 12, 2025. This C-3 showed a loan of \$97.25 from the Committee treasurer, Mr. Jensen. The \$97.25 was meant to deal with the campaign account being over-draft. If a candidate has debt, the candidate is allowed to continue accepting contributions until December 31 of the election year. For candidates subject to contribution limits, contribution limits apply. In this instance the timing of the contribution was compliant, but Mr. Jensen had already exceeded contribution limits and the \$97.25 took the Committee further over the limit.

5. The following mandatory C-4 reports, for the general election period, were submitted late:

- The 21-Day C-4 report for the period September 1 to October 14, 2024, was due on October 15, 2024. It was submitted one day late on October 16, 2024. The report, #110253328, identified \$11,685 in receipts and \$9,683.03 in expenditures.

- A combined C-4 report, #110284449, covering the period of October 15 to December 31, 2024, was submitted on May 12, 2025, 6.5 months after the election cycle ended on December 31, 2024. The combined report included the following late-filed C-4 reports:
 - o The 7-Day C-4 report, for the period October 15 to 28, 2024, due October 29, 2024;
 - o The Post-General C-4 report, for the period October 29 to November 30, 2024, due December 10, 2024;
 - o The End of Election Cycle C-4, for the period December 1 to December 31, 2024, due January 10, 2024.

The combined C-4 report identified \$1,647.25 in receipts and \$8,898.72 in expenditures. The report also indicated the campaign was over-drawn by \$1,097.25, which matches the amount of loans reported by the Committee.

- On September 19, 2025, C-4 report #110315179 was submitted for the period of January 1, 2025, to May 31, 2025, showing an in-kind contribution from Rylee Fleury to the campaign for “Repayment of loan \$97.25 / over contribution of \$150 by Larry Jensen.”

The Committee’s C-3 and C-4 Reports failed to report the full purpose of expenditures

6. The Committee reported multiple expenditures for printed materials including signs, banners, postcards, brochures, bumper stickers, and canvassing literature that did not include the quantity of items purchased. To date the reporting has not been amended by the Committee to include this required information. The total expenditure for these items was \$16,758.54.
7. The Committee reported expenditures for media buys including newspaper advertising in the La Conner News totaling \$450, “TV Time” for a vendor named Strong Impressions totaling \$2,073, and streaming ads from Strong Impressions for \$5,000. To date the reporting has not been amended by the Committee to include the date the ads were first broadcast or published.

The Committee failed to report known in-kind contributions and filed false C-4 reports

8. Banners in support of Mr. Fleury's campaign, measuring 10'x 40' and 20' x 40', were funded by Michael McDaniel and hung on cargo containers provided by Mr. Jensen on land that Mr. Jensen owned. The banners were exhibited along Highway 20 in Skagit County. Mr. McDaniel provided heavy equipment and construction materials used to erect the advertising. Additionally, Mr. Fleury – who was aware of Mr. McDaniel and Mr. Jensen's work related to the banners – used photos of himself in front of the banners as additional advertising on his campaign blog.

The cost of these in-kind contributions provided by Mr. McDaniel in the form of political advertising was not reported by the Committee. Both Mr. McDaniel and Mr. Jensen were served with a subpoena seeking information about this advertising, to include cost and fair-market value data. Neither Mr. McDaniel nor Mr. Jensen responded to the subpoena or otherwise cooperated with Staff in providing this information. As a result, Staff could not determine if reporting should have been submitted by the Committee prior to the primary election on August 6, 2024, as cost and fair-market value data are necessary to determine the precise reporting date. However, based on the date the political advertising was displayed, the contribution(s) from Mr. McDaniel should have at least appeared on the Post-Primary C-4, #110251164, covering July 29 to August 31, 2025, due September 10, 2025. The Committee did not submit the C-4 until October 12, 2024, and the in-kind contribution(s) were never reported by the Committee.

Accepting over-limit contributions

9. A candidate committee subject to contribution limits is prohibited from accepting aggregate contributions from the same contributor exceeding \$1,200 per election. On August 27, 2024, the Committee accepted a cash contribution from Mr. Jensen in the amount of \$150, reported on C-3 report #110251156. On October 7, 2024, the Committee accepted a cash contribution from Valley Investments, a sole proprietorship owned by Mr. Jensen, in the amount of \$1,200, reported on C-3 report #110251159. Contributions from sole proprietorships are considered to be contributions of the owner. On December 23, 2024, the Committee accepted a cash loan

from Mr. Jensen in the amount of \$97.25, reported on C-3 report #110284452. Thus, Mr. Jensen contributed an aggregate of \$1,447.25, or \$247.25 over the contribution limit. The over-limit contributions were not fully addressed until May 29, 2025, when Mr. Jensen informed Staff that the Committee repaid the \$97.25 loan and the \$150 over-limit contribution.

Failure to include sponsor identification on political advertising

10. The campaign website, <https://rylee1.com/blog>, was missing complete sponsor identification and party affiliation throughout the election. The website was never updated by the Committee to include that required information.
11. The political advertising paid for by Michael McDaniel, specifically the 10'x40' or 20'x40' banners, did not include complete sponsor identification or party affiliation. The banners were never updated by the Committee to include that required information.
12. Additional political advertising supporting the Committee, in the form of banners hung on all sides of a cargo truck, deployed around Skagit County during August 2024, likewise did not include complete sponsor identification or party affiliation. The banners were never updated by the Committee to include that required information.

IV. STATUTES AND RULES

RCW 42.17A.235 and **RCW 42.17A.240** state a candidate that selects the Full Reporting option on their C-1 report is required to report contributions and expenditures to the PDC on Cash Receipts Monetary Contributions reports (C-3 reports) and Campaign Summary Receipts & Expenditures reports (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 candidate's election participation, and their financial activity.

The statutes require candidates, political committees, and continuing political committees to file timely, accurate reports of contributions and expenditures, including in-kind contributions/expenditures, including 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 detailed description of the contribution, including

the name and address of vendors where contributed goods or services were purchased, and if applicable, the same information for sub vendors used by vendors.

Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$750 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same period and must be disclosed on Monday for contributions deposited during the previous seven days.

RCW 42.17A.240(7) states expenditures are disclosed on C-4 reports, which must include, but are not limited to: 1) the name and address of each person to whom an expenditure was made in the aggregate of more than \$200 during the period covered by the report; 2) the amount, date, and purpose of each expenditure; and 3) the total sum of all expenditures. Purpose details should state the goods or services provided by the vendor, including the number of items purchased, identify any candidates or ballot propositions supported or opposed by the expenditure, and the name & address of any sub-vendors used. For advertising expenditures, campaigns should describe the type and number of ads, where they appeared or were broadcast, and when (e.g., run dates).

WAC 390-16-037(2) states whenever an expenditure is made to a candidate or a political committee pursuant to an agreement or understanding of any kind regarding how the recipient will use the expenditure, the report must describe in detail that agreement or understanding and the goods and/or services to be provided.

RCW 42.17A.240(2) states each report under RCW 42.17A.235 shall disclose the name and address of each person who has made one or more contributions during the period, together with the money value and 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

WAC 390-16-207 states (1) An in-kind contribution must be reported on the C-4 report. An in-kind contribution, as that term is used in the act and these rules, occurs when a person provides goods, services or anything of value, other than money or its equivalent, to a candidate or political committee free-of-charge or for less than fair market value, unless the item or service given is not a contribution according to RCW 42.17A.005 or WAC 390-17-405.

An in-kind contribution includes an expenditure that:

- Support or oppose a candidate or a ballot measure;
- Meets the definition of contribution in RCW 42.17A.005 or WAC 390-05-210;
- Is an electioneering communication that is a contribution as provided in RCW 42.17A.310;
- and
- Is other than a monetary contribution made directly to a candidate or political committee.

For example, an in-kind contribution occurs when a person, after collaborating with a candidate or a candidate's agent, purchases space in a newspaper for political advertising supporting that candidate or opposing that candidate's opponent.

WAC 390-05-210(3) states an expenditure made by a person in cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate, or the candidate's authorized committee or agent, is a contribution to such candidate. An expenditure is presumed to be made in cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate, or the candidate's authorized committee or agent, when:

(a) Any arrangement, coordination, or direction by the candidate, or the candidate's authorized committee or agent, is given to the expending person prior to the publication, distribution (digital or otherwise), display or broadcast, of political advertising or electioneering communications or prior to an expenditure being made by that person supporting that candidate or opposing one or more of that candidate's opponents;

(b) An expenditure is made based on information about the candidate's plans, projects, or needs provided to the expending person by the candidate, or the candidate's authorized committee or agent, with a view toward having an expenditure made;

(c) An expenditure is made by, through, consultation with, or with the assistance of, including the fund-raising assistance of, any person who, during the twelve months preceding the expenditure, is or has been an officer of the candidate's authorized committee; or

(d) An expenditure is made by or in consultation with any person who, during the twelve months preceding the expenditure, is or has been receiving any form of campaign-related compensation or reimbursement from the candidate, or the candidate's authorized committee or agent. However, there is no presumption that an expenditure is made in cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate, or the candidate's authorized committee or agent, when a person performs only ministerial functions for two or more candidates or political committees pursuant to RCW 42.17A.005 and WAC 390-05-243.

RCW 42.17A.145 states every report and statement required to be filed under Chapter 42.17A shall be certified as complete and correct, by both the person preparing it and by the person on whose behalf it is filed.

RCW 42.17A.405(2) states no person, other than a bona fide political party or a caucus political committee, may make contributions to a candidate for a legislative office, county office, city council office, mayoral office, school board office, or public hospital district board of commissioners that in the aggregate exceed *twelve hundred dollars for each election in which the candidate is on the ballot or appears as a write-in candidate. Contributions to candidates subject to the limits in this section made with respect to a primary may not be made after the date of the primary. However, contributions to a candidate or a candidate's authorized committee may be made with respect to a primary until thirty days after the primary, subject to the following limitations: (a) The candidate lost the primary; (b) the candidate's authorized committee has insufficient funds to pay debts outstanding as of the date of the primary; and (c) the contributions may only be raised and spent to satisfy the outstanding debt. Contributions to candidates subject to the limits in this section made with respect to a general election may not be made after the final day of the applicable election cycle.

WAC 390-16-310(4) states the limitations on contributions as provided in RCW 42.17A.420, 42.17A.405, and 42.17A.410, as adjusted by WAC 390-05-400, are as follows:

(4) Contributions from a business organized as a sole proprietorship and contributions from the owner of the sole proprietorship must be aggregated for purposes of determining the limitations of

contributions under RCW 42.17A.420, 42.17A.405, or 42.17A.410, as adjusted by WAC 390-05-400.

RCW 42.17A. 320 (1) & (3) state all written political advertising shall include the name and address of the sponsor. The use of an assumed name for the sponsor shall be unlawful. 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 states all advertising must clearly state that it has been paid for by the sponsor. RCW 42.17A.320(3) sets forth the size and placement requirements for identifying the sponsor of political advertising. Subsection (a) states that the font size used in the sponsor identification statement for a written advertisement or communication directed at more than one voter must be at least the larger of the following: 1) ten-point type; or 2) ten percent of the largest type used in the advertisement.

RESPECTFULLY SUBMITTED this 11th day of December 2025.

/s/ Electronically Signed

Peter Frey Lavallee

Executive Director