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

In re the Matter of Enforcement Action
Against:

Committee to Elect Rylee Fleury,

Respondent.

PDC CASE NO. 158645

FINAL ORDER

I. INTRODUCTION

This matter was heard by the Washington State Public Disclosure Commission (PDC, Commission) on January 22, 2026, by in-person, telephonic, and online streaming access. The hearing was held pursuant to Chapter 34.05 RCW, Chapter 42.17A RCW, and Chapter 390-37 WAC.

Commissioners present online were J. Robert Leach, Commission Chair (presiding); Douglass North, Commission Vice-Chair; and Commissioner James Oswald. Also present online were Assistant Attorney General John S. Meader representing the Commission; and Assistant Attorney General Susie Giles-Klein representing PDC staff. Tanya Mercier, Compliance Officer for PDC Staff, appeared online and Rylee Fleury appeared in-person for the

1 Respondent. The proceeding was open to the public and recorded.

2 The hearing concerned allegations that the Respondent violated RCW 42.17A.235 and
3 .240, RCW 42.17A.145,¹ and WAC 390-16-037, WAC 390-16-207, and WAC 390-16-043 by
4 (1) failing to timely file Cash Receipts, Monetary Contribution (C-3) reports; (2) in advance of
5 the 2024 primary election, failing to timely file mandatory 21-day, 7-day, and post-primary
6 Receipts and Expenditure Summary (C-4) reports; (3) in advance of the 2024 general election,
7 failing to timely file mandatory 21-day, 7-day, post-general, and end-of-election C-4 reports; (4)
8 failing to report the full purpose of expenditures; (5) failing to report in-kind contributions; and
9 (6) filing false C-4 reports. Staff also alleges that during election year 2024 the Committee
10 violated RCW 42.17A.405(2) and WAC 390-16-310(4) by accepting over-limit contributions.
11 Staff further alleges that, during election year 2024 the Committee violated RCW 42.17A.320
12 and WAC 390-18-010 by failing to include sponsor identification on political advertisements.

13
14 The Commissioners had before them the following materials:

- 15 • Amended Notice of Administrative charges, PDC Case No. 158645, dated
16 December 11, 2025, and signed by Executive Director Peter Lavallee;
- 17 • PDC Staff’s Witness and Exhibit List, signed by Susie Giles-Klein, Assistant
18 Attorney General, and dated January 14, 2026; which included:
 - 19 ○ Exhibit 1: Complaints to the PDC from Conner Edwards, Keith Tacker,
20 and Wim Houppermans, filed with the PDC on various dates;
 - 21 ○ Exhibit 2: Committee to Elect Rylee Fleury’s PDC Registration and
22 Amended Registration along with PDC Staff’s correspondence with
23 Rylee Fleury from August 2024, to September 2025;
 - 24 ○ Exhibit 3: Screenshots of Rylee Fleury’s campaign website, undated;

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¹ The alleged violations in this case occurred in 2024 and 2025. The citations in this order reflect the statutes in effect at that time rather than the amended citations in Title 29B in effect as of January 1, 2026.

- 1 ○ Exhibit 4: PDC Staff’s correspondence with Michael McDaniel from
- 2 November 2024;
- 3 ○ Exhibit 5: PDC Staff’s correspondence with Larry Jensen from
- 4 November 2024;
- 5 ○ Exhibit 6: PDC Staff’s Subpoena to Testify and Subpoena Duces Tecum
- 6 to Michael McDaniel, dated November 22, 2024;
- 7 ○ Exhibit 7: PDC Staff’s Subpoena to Testify and Subpoena Duces Tecum
- 8 to Larry Jensen dated November 22, 2024, and Mr. Jensen’s response to
- 9 PDC Staff, dated November 25, 2024;
- 10 ○ Exhibit 8: PDC Staff’s correspondence with Larry Jensen about over-limit
- 11 contributions from February 2025, to September 2025;
- 12 ○ Exhibit 9: Screenshots of Rylee Fleury’s Campaign Blog, undated;
- 13 ○ Exhibit 10: Respondent’s Campaign Expenditures with insufficient
- 14 descriptions, various dates;
- 15 ○ Exhibit 11: Respondent’s 2024 C-3 Reports, various dates;
- 16 ○ Exhibit 12: Respondent’s 2024 C-4 Reports, various dates;
- 17 ○ Exhibit 13: PDC Staff’s correspondence with Keith Tacker from October
- 18 31, 2024, Google Maps screenshots, and Skagit County description of
- 19 property belonging to Larry Jensen;
- 20 ○ Exhibit 14: Respondent’s Committee Registration with PDC and
- 21 Respondent’s Candidate Information with Washington Secretary of State,
- 22 undated;
- 23 ○ Exhibit 15: PDC Staff’s Report of Investigation, signed by Tanya
- 24 Mercier, and dated December 11, 2025;
- 25 • Respondent’s evidence submitted:
- 26 ○ Correspondence from Rylee Fleury and Larry Jensen to the PDC, dated

1 December 18, 2025;

2 ○ Correspondence from Rylee Fleury and Larry Jensen to the PDC, dated
3 December 29, 2025;

4 ○ Correspondence from Rylee Fleury to the PDC, dated December 31,
5 2025;

- 6 • Proposed Amended Partial Stipulation as to Facts, submitted by the parties and signed on
7 January 12, 2026, by Rylee Fleury for the Respondent, and on January 12, 2026, by Peter
8 Lavallee, Executive Director, for the PDC.

9 10 **II. PARTIAL STIPULATION AS TO FACTS**

11 The parties jointly submitted a signed Amended Partial Stipulation as to Facts
12 (Stipulation). Ms. Giles-Klein presented the Stipulation, reviewed the aggravating and
13 mitigating factors, summarized the facts and asked the Commission to accept the Stipulation.
14 The Respondent was unavailable for this portion of the hearing. The Commission voted 3-0 to
15 accept the Stipulation as submitted.

16 17 **III. FINDINGS OF FACT**

18 1. On May 24, 2024, Rylee Fleury registered a candidate committee, choosing the
19 full reporting option, with the PDC. On June 3, 2024, Mr. Fleury amended the registration to
20 reflect that he was the candidate, the Committee's name was changed, and he added Larry R.
21 Jensen as the Assistant and Ministerial Treasurer. The Committee's purpose was to support Mr.
22 Fleury's campaign for County Commissioner, Position 1, in Skagit County.

23 The Committee's registration identified Tim Garrison as the Treasurer. However,
24 throughout the campaign and Staff's investigation, the record shows Mr. Garrison did not
25 communicate with Staff, nor did he file any of the Committee's C-3 or C-4 reports. Mr. Jensen
26 and Mr. Fleury were the primary contacts for the Committee, with Mr. Jensen submitting all the

1 campaign reporting and being the main person that Staff worked with during the investigation.

2
3 2. The Committee failed to report the purpose of expenditures for printed materials
4 including signs, banners, postcards, brochures, bumper stickers, and canvassing literature and
5 did not include the quantity of items purchased. The Committee was notified of the requirements
6 but as of the date of the hearing the Respondent had not amended its reporting to include all the
7 required information. The total expenditure for these items was \$16, 758.54.

8
9 3. The Committee accepted aggregate contributions from the same contributor
10 exceeding the \$1,200 per election limit. On August 27, 2024, the Committee accepted a cash
11 contribution from treasurer Larry Jensen of \$150. On October 7, 2025, the Committee accepted
12 a cash contribution from Valley Investments, a sole proprietorship owned by Mr. Jensen, in the
13 amount of \$1,200. Contributions from sole proprietorships are considered to be contributions of
14 the owner. On December 23, 2024, the Committee accepted a cash loan from Mr. Jensen in the
15 amount of \$97.25. In total, Mr. Jensen contributed \$1,447.25, or \$247.25 over the contribution
16 limit. Mr. Jensen informed the PDC that the Committee repaid the \$97.25 loan and the \$150
17 over-limit contribution on May 29, 2025.

18
19 4. The Committee failed to report in-kind contributions resulting in the filing of
20 false receipts and expenditure summary reports (C-4). Two campaign signs were placed on
21 Highway 20 in Skagit County that were political advertising. The construction of the signs was
22 coordinated with the Committee, and the signs were placed on the Assistant and Ministerial
23 Treasurer Larry Jensen's private property with his consent and assistance. Mr. Fleury was
24 invited to watch the completion of the signs and had actual knowledge about the planning and
25 expenditures related to the political advertising.

26 On September 10, 2024, Mr. Fleury provided the PDC with a signed affidavit from

1 Michael McDaniel that he was responsible for the banner signs and that he supplied the
2 equipment used to erect the signs. On September 27, 2024, staff notified Mr. Fleury he was
3 required to report the costs associated with the advertising. The cost of these in-kind
4 contributions has not been reported to the PDC.

5
6 5. The Committee did not include sponsor identification and party preferences on
7 political advertisements. Complete sponsor identification and party preference was missing
8 throughout the election on the campaign website and on the signs displayed on a cargo truck
9 driven around Skagit County.

10
11 6. The facts of the Respondent's late filed C-3 and C-4 reports during the primary
12 election period and the general election period are described on pages 2-5 of the stipulation and
13 are incorporated by reference into this order.

14 15 16 **IV. CONCLUSIONS OF LAW**

17 1. The Commission has jurisdiction over this proceeding pursuant to Chapter 42.17A
18 RCW, the state campaign finance and disclosure law; Chapter 34.05 RCW, the Administrative
19 Procedure Act; and Title 390 WAC.

20
21 2. The Commission accepts the parties' agreed partial stipulation as to facts and finds
22 the Respondent has violated RCW 42.17A.235, RCW 42.17A.240, and WAC 390-16-043 by
23 failure to timely and accurately file Cash Receipts, Monetary Contributions (C-3) Reports, and
24 Mandatory Receipts and Expenditure Summary (C-4) Reports.

25
26 3. The Committee violated RCW 42.17A.240(7) and WAC 390-16-037 by failing

1 to report multiple expenditures for media buys and printed materials and by failing to provide
2 the quantity of numerous items purchased by the Committee.

3
4 4. The Committee violated RCW 42.17A.403(2) and WAC 390-16-310(4) by
5 accepting aggregate over-limit contributions from Mr. Jensen as an individual and as a sole
6 proprietor of a business.

7
8 5. The Committee violated RCW 42.17A.240(2), WAC 390-16-207, and WAC 390-
9 05-210(3) by failing to report in-kind contributions that resulted in the filing of false Receipts
10 and Expenditure Summary (C-4) reports in violation of RCW 43.17A.145. Mr. Jensen's
11 coordination of these contributions was conducted in his role as a Committee Treasurer and not
12 solely in his private capacity. While the Committee and its members have rights of free speech
13 under the First Amendment of the United States Constitution, those rights do not extend to failing
14 to report their actions as part of campaign finance regulation.

15
16 6. The Committee violated RCW 42.17A.320 and WAC 390-18-010 by failing to
17 include sponsor identification and party preference on its website and trucks carrying signs in
18 the community.

19
20 7. Mitigating factors present in this matter are that the candidate and the
21 Committee were new to running a campaign for public office and the Committee worked with
22 staff to correct errors and to file missing C-3 and C-4 reports. Additionally, the over-limit
23 contribution was repaid, although it was after the general election. Aggravating factors are that
24 the cooperation of the Committee lessened as the investigation continued and that the
25 Committee has so far refused to provide a value for the in-kind contributions made to the
26 campaign.

1
2 **V. ORDER**

3 Based upon the agreed Amended Partial Stipulation as to Facts, and the Commission's
4 Findings of Fact and Conclusions of Law, and after review of the mitigating and aggravating
5 factors and consideration of the arguments and exhibits presented at hearing, the Commission
6 assesses an aggregate civil penalty for all violations on Respondent, The Committee to Elect
7 Rylee Fleury, of \$2,100, with \$700 suspended, on the following conditions:

- 8
- 9 (1) a. The non-suspended portion of the penalty (\$1,400) is paid by the
10 Respondent within 60 days of the date of the Final Order.
- 11
- 12 b. The Respondent amends its C-4 reports to include the missing quantity
13 information and the actual cost of the in-kind contributions. If the actual
14 costs are unavailable, the Respondent may substitute a fair market
15 estimate of the in-kind expenses.
- 16
- 17 c. The Respondent remains in full compliance with all PDC reporting
18 requirements and is not found to have committed any further violations
19 of Chapter 42.17A RCW or Title 390 WAC within four years of the date
20 of this Final Order. The suspended penalty shall not be assessed based
21 solely upon any remediable violation, minor violation, or error classified
22 by the Commission as appropriate to address by a technical correction.
- 23

24 (2) If the Respondent fails to make timely payment of the non-suspended portion of
25 the penalty, the total civil penalty of \$2,100 shall immediately become due and the matter may
26

1 be sent to collection or brought to Superior Court as allowed by law without further action by
2 the Commission.

3
4 So ORDERED this __ 11th __ day of February, 2026.
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6
7 WASHINGTON STATE PUBLIC
8 DISCLOSURE COMMISSION

9 FOR THE COMMISSION:

10 J. Robert Leach

J. Robert Leach (Feb 11, 2026 11:22:35 PST)

11 J. Robert Leach,
12 Chair, Public Disclosure Commission

13 *Copy of this Order mailed and/or emailed to:*

14 Respondent, The Committee to Elect Rylee Fleury,
15 c/o Rylee Fleury, P.O. Box 711, Clearlake, WA 98235
16 ryleefleury@protonmail.com
17 info@rylee1.com

18 Tanya Mercier, PDC Compliance Officer, Tanya.mercier@pdc.wa.gov

19 Susie Giles-Klein, Assistant Attorney General, Counsel for PDC Staff, Susie.giles-klein@atg.wa.gov.

20
21 I, Tanya Mercier, certify that I mailed and/or emailed a copy of this order to the
22 Respondent/ Applicant at his/her respective address postage pre-paid on the date stated
23 herein.

24 Tanya Mercier

Tanya Mercier (Feb 11, 2026 12:05:52 PST)

Signed

Feb 11, 2026

Date

1
2 **NOTICE: RECONSIDERATION**

3 Pursuant to the provisions of RCW 34.05.470 and WAC 390-37-150, you may file a Petition for
4 Reconsideration with the PDC within ten (10) days from the date this Final Order is served upon
5 you. Any Request for reconsideration must state the specific grounds for the relief requested.
6 Petitions must be electronically mailed to the Washington State Public Disclosure Commission,
7 711 Capitol Way, Room 206, Box 40908, Olympia WA 98504-0908, pdc@pdc.wa.gov.

8
9 **NOTICE: PETITION FOR JUDICIAL REVIEW**

10 You have the right to appeal this Final Order to Superior Court, pursuant to the Petition for
11 Judicial Review provisions of RCW 34.05.542. Any Petition for Judicial Review of this Final
12 Order must be filed with the court and also served upon both the Commission and the Office of
13 the Attorney general within thirty (30) days after the date this Final Order is served upon you.
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Final_Order_CommitteeToElectFleury-158645

Final Audit Report

2026-02-11

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By:	Jana Greer (jana.greer@PDC.WA.GOV)
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-  Document created by Jana Greer (jana.greer@PDC.WA.GOV)
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-  Document emailed to j.leach@pdc.wa.gov for signature
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-  Signer j.leach@pdc.wa.gov entered name at signing as J. Robert Leach
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