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

February 25, 2025

Delivered electronically to iglitzin@workerlaw.com, maria@weareella.org, cole@workerlaw.com

Subject: Complaints filed by Kenton Gartrell, Steve Edwards, and Roy Dove, PDC Case 160795

Dear ELLA Adelante:

Below is a copy of an electronic letter sent to Kenton Gartrell, Steve Edwards, and Roy Dove concerning complaints filed with the Public Disclosure Commission (PDC).

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

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to provide sponsor identification on political advertising in accordance with RCW 42.17A.320. Staff expects you to ensure that any future political advertising by ELLA Adelante include all required elements of sponsor identification ("Paid for by" or "Sponsored by," followed by the name and full address of the sponsor). The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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, you may contact Casey Gayman at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed by Casey Gayman
Casey Gayman
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

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February 25, 2025

Delivered electronically to patriotvikingwoodworking@gmail.com, jd520720@gmail.com, birdman57@protonmail.com

Subject: Complaints regarding ELLA Adelante, PDC Case 160795

Dear Kenton Gartrell, Steve Edwards, and Roy Dove:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on October 16, 2024, October 17, 2024, October 30, 2024, and November 1, 2024. The complaints alleged that ELLA Adelante may have violated RCW 42.17A.205 and .320 by failing to register with the PDC as a political committee and by failing to provide sponsor identification on political advertising.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the responses provided by ELLA Adelante (the "Respondent"); and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- RCW 42.17A.205 requires every political committee to register with the PDC by filing a C-1pc report within two weeks of organizing; or first having the expectation of receiving contributions or making expenditures in an election campaign, whichever is earlier. Pursuant to RCW 42.17A.005(41) a "political committee" is "any person (except a candidate or an individual dealing with the candidate's or individual's own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition." PDC Interpretation 07-02 "Primary Purpose Test" outlines the qualifying activities, receiving contributions and making expenditures, which can trigger the registration requirement.
- RCW 42.17A.320 requires all written political advertising, whether relating to candidates or ballot propositions, to include sponsor's name and address. A complete sponsor identification includes the language "Paid for by" or "Sponsored by," including the sponsor's name and full address of the sponsor in the same location, to clearly identify the sponsor of the political advertisement.
- The complaints allege the Respondent distributed door hanger advertisements across Yakima County in October 2024 containing biographic information in English and Spanish for three candidates for state offices and one candidate for federal office. The advertisement included the

ELLA Adelante logo, but it did not include its address or the required "Paid for by" or "Sponsored by" language.

- Staff noted that the Respondent did not include required sponsor identification language in social media posts published on October 23, 2024, October 31, 2024, and November 1, 2024, that encouraged viewers to oppose Initiative 2117, a statewide ballot measure.
- In response to the complaints, the Respondent's legal representatives Dmitri Iglitzin and Azor Cole acknowledged that ELLA Adelante should have provided sponsor information and would have had it been aware of the law. They noted the organization spent approximately $753.73 on the door hangers identified in the complaints and distributed 2,750 of them throughout the towns of Sunnyside, Grandview, and Mabton. This represented the total amount spent on all political advertising during the 2024 election cycle.
- It appears that the missing sponsor identification on the Respondent's advertisements was a result of the limited experience and general lack of knowledge regarding sponsor identification requirements and not done to purposely conceal the sponsor's involvement from the public, given the placement of the Respondent's logo on the communications.
- According to the Respondent's legal representatives, ELLA Adelante is funded almost entirely through a series of general grants received by the Inatai Foundation, and ELLA Adelante does not solicit or receive money that is designated for use in any candidate or ballot proposition campaign. They noted that less than 1% of ELLA Adelante's budget was used for electoral political expenditures during the 2024 campaign cycle.
- In reviewing the case materials, staff reviewed PDC Interpretation No. 07-02 to determine if the Respondent's expenditures triggered the requirement to register as a political committee. Based on the evidence there is no indication the Respondent used over 30% of its resources on spending in the election campaign. The expenditure made for political advertising also did not reach the dollar amount thresholds to trigger Independent Expenditure reporting. However, we also must consider if the activities related to the election campaign spending, regardless of dollar amount, constitute a primary purpose of the organization. In this case, we found the election of the candidates endorsed in the advertisements would be favorable to the mission of the organization to increase awareness in the Latina/Latino community about the importance of public engagement, but the organization's political advertising represented a minor aspect of the organization's overall activities. Therefore, registration as a political action committee was not required by the Respondent.

Staff has determined that, in this instance, the allegation that the Respondent has failed to register with the PDC as a political committee is unfounded, and that the failure to include complete sponsor identification on political advertising does not amount to a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, ELLA Adelante will receive a formal written warning concerning the failure to provide sponsor identification on political advertising in accordance with RCW 42.17A.320. The formal written warning will include staff's expectation that ELLA Adelante ensures that any future political advertising by ELLA Adelante include all required elements of sponsor identification ("Paid for by" or "Sponsored by," followed by the name and full address of the sponsor). The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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, you may contact Casey Gayman at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed by Casey Gayman
Casey Gayman
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director