



Washington State Republican Party

Washington Public Disclosure Commission
711 Capitol Way S. #206
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Olympia, WA 98504-0908

Please accept my comments on behalf of the Washington State Republican Party regarding permanent rules for the implementation of Senate Bill 6152. After conducting business under the emergency rules for the 2020 election, we have several comments regarding the practical application of the statute and corresponding rules.

First, we suggest that political committees and candidates who are organized under, and file with, the PDC be exempt from the obligation provide these certifications themselves when they make a contribution to another committee or candidate's committee. By law, we are organized under the laws of Washington State and cannot accept any funds from (or directed by) foreign nationals. The obligation to provide these certifications to every candidate, PAC, or county party we support financially increases our administrative burden considerably and is functionally redundant. In short, committees who are legally obligated to collect non-foreign certifications from their non-individual donors should not have to also provide non-foreign certifications when they make a contribution, since it is written into law that none of their funds are from or directed by foreign nationals.

For example, if we made a contribution to one of our county parties, forgot to send a certification, and they, being entirely volunteer-run, forgot to collect a certification, then they would be in violation of these rules even though it is inherent that any contribution from the Washington State Republican Party meets the criteria laid out in the statute and the rules. The requirement results in more risk and administrative burden for committees without any added assurance that foreign nationals are not influencing our elections.

Second, it would also ease the administrative burden considerably if we were only required to collect one certification per entity per calendar year instead of collecting one for every contribution. For example, a company could certify just once that they are not organized under the laws of, and does not have its principal place of business in, a foreign country and that their political contributions are not financed in any part by a foreign national, and foreign nationals are not involved in making decisions regarding political contributions in any way. A line could also be added to the certification that they will notify the committee should any of the above-stated circumstances change.

I appreciate your consideration of the above comments.

Please feel free to contact me with any questions or need for clarification.

Respectfully submitted,

Caleb Heimlich
Chairman, Washington State Republican Party