



May 10, 2023

Dear Commissioners and staff:

On behalf of the League of Women Voters of Washington, I thank the PDC for providing this opportunity to comment on the guidance regarding candidate's use of campaign contributions received for a different office than the office the candidate is currently seeking. I appreciate the clarity of the staff memo analyzing the current interpretation of the law and also the concerns raised from stakeholders.

The League supported the creation of the PDC with the passage of I-276 in 1972, and continues to support their work. Our support was based on the Principles of the League of Women Voters that democratic government depends upon the informed and active participation of its citizens and requires that governmental bodies protect the citizen's right to know.

We respect the PDC's responsibility to interpret legislative intent and provide guidance. We also appreciate the healthy approach that when the law is silent, or unclear, or concern is raised, of asking for public comment from stakeholders.

In addition to League Principles, the League adopts positions after study and consensus. Our 1985 Campaign Financing study resulted in a position stating campaign contributions should be limited and the PDC should implement laws pertaining to these limitations. This is to ensure the public's right to know, combat undue influence, enable candidates to compete more equitably for public office, and promote citizen participation in the election process. The intent of I-134 which established the Fair Campaign Practice Act 1993, was to ensure individuals and interest groups have fair and equal opportunity to influence election results, reduce the influence of large organizational contributors, and restore public trust in governmental institutions and electoral processes.

Enforcing limits on campaign donations to combat undue influence and protecting the public's right to know who is contributing to a candidate running for a new office is essential to healthy democracy. Existing law only allows surplus funds to be transferred to a campaign for a different office when the original contributor gives permission. The fact that the law recognizes a difference between using surplus funds for the same office in a different year from a different office leads us to recommend the more transparent approach of option two to both disclose and apply these contributions to current limits for the new office.

Thank you again for the opportunity to provide comment. Your work is much appreciated.

Best regards,

Cindy Madigan

League of Women Voters of Washington

Money In Politics Issue Chair

cmadigan@lwwv.org

[Empowering Voters. Defending Democracy. 1511 Third Avenue, Suite 900 | Seattle, WA 98101 | 206-622-8961](#)
info@lwwva.org | www.lwwva.org