



Washington State Republican Party

Washington Public Disclosure Commission
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Please accept my comments on behalf of the Washington State Republican Party regarding emergency rules for the implementation of Senate Bill 6152.

First, the requirement to receive certification in writing prior to deposit, which must occur within five business days of receipt, is incredibly burdensome. Many of our non-individual contributors are small, family-run businesses that may not be aware of the new certification requirement prior to mailing their contribution. It is rare that we have email addresses for these entities and most communication will happen via United States Postal Service. It not reasonable to assume that we can mail a request for certification, the business will receive it, complete it, mail it, and we will receive it back at our office within five days. We may be forced to reject perfectly legal contributions due to the impossibility of complying with the time limit laid out in the emergency rules. My suggestion would be to allow for deposit of the contribution and grant an extended timeframe, like 30 days, to obtain the certification.

Second, I am concerned that the language in section 3d under "Certification for Contributions from Entities - Prohibited Activity by Foreign Nationals" of the emergency rules is stricter than the law itself. Asking an entity to certify that it is not financed in any part by a foreign national is a much broader interpretation of the law which only states that the contribution not be financed or influenced in any way by a foreign national. This would deter legal contributions from entities with partial foreign-ownership or foreign subsidiaries, even though they meet the standards laid out in the statute.

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