

PROTECTING WASHINGTON STATE'S PUBLIC DISCLOSURE LAWS

This report discusses how to ensure a level playing field and prevent corruption or the appearance of corruption in the electoral processes in Washington State by protecting and strengthening the integrity of Washington State Public Disclosure Laws.

"Sunlight is said to be the best of disinfectants." Supreme Court Justice Louis Brandeis, 1913 Harper's Weekly article.

Washington State's Public Disclosure Laws

In 1971 a broad-based coalition of citizens and organizations, including the League of Women Voters of Washington (LWVWA), formed the Coalition for Open Government. Their work resulted in the gathering of signatures for Initiative 276 in record-breaking time and the subsequent passage of the Washington Public Disclosure Act in 1972. Initiative 276 received 72% voter support. The Seattle Post-Intelligencer reported on November 8, 1972 that it was the *"toughest campaign and lobbying disclosure law in the nation."*¹

Subsequently, the Public Disclosure Commission (PDC) was formed. It was created by the Open Government Act of 1973 to ensure that the provisions of the Washington Public Disclosure Act of 1972 (Initiative 276) were fully met. The policy provisions of the Open Government Act of 1973² state:

Initiative 276 created a five-member, bi-partisan citizen commission to ensure that the provisions of the disclosure law are fully met. Commission members are appointed by the Governor for one five-year term and are confirmed by the state senate with the stipulation that only three of the five may be members of a single political party. Recognizing that the members would be serving in highly visible and sensitive positions, the drafters of the initiative put additional constraints on commissioners. No member may:

- *hold or campaign for elected office;*
- *be an officer of any political party or political committee;*
- *support or oppose any candidate or ballot proposition;*
- *participate in any way in any election campaign inside or outside of WA state; or lobby, employ or assist a lobbyist, except on Commission matters.*

The League of Women Voters has described its role in these actions as follows:

"The League of Women Voters of Washington was an originator of Initiative 276, which established the Public Disclosure Commission and set specific limits on donations to candidates. We've fought to strengthen Public Disclosure Commission enforcement and

¹ Cuillier, David Dean & Ross, Susan Dente, Initiative 276, AccessNorthwest, Edward R. Murrow School of Communication, Washington State University, May 4, 2004, updated Aug. 24, 2004, p.8, <http://www.washingtoncog.org/pdfs/i276%20document%20-%20David%20Cuillier.pdf>, viewed 04/26/16

² "About Public Disclosure in Washington State", Public Disclosure Commission, n.d., <https://www.pdc.wa.gov/about-pdc>, 05/28/16.

*now are pleased to be joining as friends of the court with Washington Coalition for Open Government (WCOG) to protect and strengthen citizens' right to sue in a case before the Washington Supreme Court, Utter vs. BIAW. The case involves whether citizens may bring enforcement suits if, for any reason, the state Attorney General chooses not to bring suit in response to allegations of disclosure violations. The League and WCOG argue that the citizen's enforcement action is the lasting ray of sunlight so that voters can 'follow the money' in campaigns."*³

Court Cases Enforcing or Defending Washington State Public Disclosure Laws

Since Initiative 276 and the Open Government Act of 1973, there have been a number of court challenges to these laws. This section describes specific cases wherein the State of Washington and/or the PDC have defended or sought enforcement of the public disclosure laws.

In October 2009, *Family PAC v. McKenna, Clements, Seabrook, Noland, Joly, Sehlin* [Public Disclosure Commission/Attorney General's Office (AGO) are parties] challenged the provisions in the WA Public Disclosure Law involving political committees that support or oppose ballot measures. The challenged provisions say: 1) there must be disclosure of names and addresses of contributors giving more than \$25, 2) there must be disclosure of employer and occupation of contributors giving more than \$100 (both ruled constitutional), and 3) political committees cannot accept from any one person contributions exceeding \$5,000 during the 21-day period preceding a general election. (This was ruled unconstitutional as a significant burden on First Amendment rights.)^{4, 5}

In April 2010, *Many Cultures, One Message and Red State Politics d/b/a/ "Conservative Enthusiasts" v. Clements, Seabrook, Noland, Sehlin, Joly and Ellis* (PDC and Attorney General's Office are parties) challenged a Washington State law that requires a person or entity to register and file reports as a lobbyist for grassroots lobbying if they receive or spend \$500 in any 30-day period or \$1,000 in any 90-day period to influence legislation.⁶ The U.S. 9th Circuit Court of Appeals dismissed the case on procedural grounds, and there was no decision on constitutionality; therefore, the law could be challenged again in the future.

In June 2011, *Farris, Recall Dale Washam, and Oldfield & Helsdon v. Seabrook, Sehlin, Joly, Clements and Ellis* [PDC and Attorney General's Office (AGO) are parties] challenged the PDC statute that capped the amount of contributions that could be donated to a recall campaign. The U.S. 9th Circuit Court of Appeals ruled: "*The district court's conclusion that the plaintiffs would suffer irreparable harm from the contribution limit due to the limited time they had to gather signatures thus was not an abuse of discretion.*" ...*The district court properly granted the preliminary injunction prohibiting enforcement of*

³ "LWV – Defending Citizens' Right to Campaign Disclosure". *League of Women Voters E-News*, 2013, n.d., http://participate.lwv.org/o/5950/c/9163/t/0/blastContent.jsp?email_blast_KEY=162611, August 19, 2015.

⁴ *FAMILY PAC, v. ROB MCKENNA et al.*, United States Court of Appeals for the Ninth Circuit, December 29, 2011, No. 10-35832 D.C. No. 3:09-cv-05662-RBL, <http://cdn.ca9.uscourts.gov/datastore/opinions/2011/12/29/10-35832.pdf>

⁵ " *FAMILY PAC, v. ROB MCKENNA* ", *The Judicial View*, n.d., http://judicialview.com/Court-Cases/Constitutional_Law/Family-PAC-v-McKenna/17/47053, August 19, 2015.

⁶ "Many Cultures, One Message Et Al. v. Clements Protecting Americans' Right To Engage In Grassroots Political Activism", *The Institute for Justice*, n.d. <http://ij.org/case/many-cultures-one-message-et-al-v-clements/>, August 19, 2015.

*the \$800 contribution limit.*⁷ The 9th Circuit decision didn't resolve whether the law can be applied to other groups seeking to recall elected officials; therefore, the law remains somewhat unsettled. The Institute for Justice pursued consideration of that issue by the Court of Appeals but was denied.⁸ Subsequently, Institute for Justice petitioned the Supreme Court of the United States (SCOTUS) arguing that the 9th incorrectly decided an important question of law, but SCOTUS declined to hear the case.

In June 2013, *Institute for Justice, Robin Farris, Recall Dale Washam, Oldfield & Helsdon v. State of Washington, Public Disclosure Commission, Ranade, Sehlin, Degginger, Turner and Doyle* challenged as unconstitutional the definition that pro bono legal help is an "in-kind contributions"⁹. On April 1, 2015, an injunction was ordered, attorneys' fees awarded, and the case was closed. The Court of Appeals Ninth Circuit ruled that the district court had properly granted the preliminary injunction prohibiting enforcement of the \$800 contribution limit against the plaintiffs.¹⁰

In October 2013, WA Attorney General Ferguson filed suit in Thurston County Superior Court [*State v. Grocery Manufacturers Association*] alleging that the Grocery Manufacturers Association (GMA), the biggest single donor to the "No on I-522" campaign [Genetically Modified Organisms (GMO) labeling initiative], violated the state's campaign disclosure laws by failing to register and file reports as a political committee. At that time, the GMA had illegally collected and spent more than \$7 million while shielding the identity of its donors. The GMA board then voted to register as a political committee and filed required documents regarding their effort to oppose Initiative 522.¹¹

However, on 01/14/2014, The Seattle Times reported in "*Grocery Industry Challenges Law*" that the Attorney General Ferguson was raising an alarm, stating that the Grocery Manufacturers Association "*are trying to invalidate some state restrictions on spending by out-of-state political committees, arguing the laws violate its civil and constitutional rights.*" According to The Seattle Times, Attorney General Ferguson maintained, "[The Grocery Manufacturers] *did not just say 'we haven't broken the law'. What they're saying is, 'some of your campaign finance laws are unconstitutional.'*" The pursuing court case, *State v. GMA*, now includes contesting RCW 42.17A.442, a state law that says, a "*political committee may make a contribution to another political committee only when the contributing political committee has received contributions of \$10 or more each from at least 10 persons registered to vote in Washington state.*" The case is pending.¹²

Recent Legislative Challenge to the Public Disclosure Laws

⁷ "FARRIS PLLC v. SEABROOK", Findlaw, n.d., <http://caselaw.findlaw.com/us-9th-circuit/1591444.html>, August 19, 2015.

⁸ "Washington Recall: Farris Et Al. v. Seabrook Et Al., Campaign Finance Laws versus Good Government," The Institute for Justice, n.d., <http://www.clinic.ij.org/washington-recall>, April 26, 2016

⁹ Institute for Justice, et al. v State of Washington, et al., <http://ij.org/wp-content/uploads/2013/06/Order-Granting-PI-IJ054448xA6322.pdf>, 05/28/16

¹⁰ "FARRIS PLLC v. SEABROOK", <http://cdn.ca9.uscourts.gov/datastore/opinions/2012/04/11/11-35620.pdf>.

¹¹ Guthrie, Janelle, and Alison Dempsey-Hall, "Status Report on AG Lawsuit Against Grocery Manufacturers Association", Press Release, Washington State Attorney General, October 30, 2013, www.atg.wa.gov/news/news-releases/status-report-ag-lawsuit-against-grocery-manufacturers-association.

¹² Brunner, Jim, "Grocery Group Claims Its Civil Rights Violated by Washington Campaign-finance Laws," Politics Northwest Blog, The Seattle Times, January 13, 2014, <http://blogs.seattletimes.com/politicsnorthwest/2014/01/13/grocery-group-claims-its-civil-rights-violated-by-washington-campaign-finance-laws/>.

In an attempt to change the way members of the commission were selected, on Sen. Sharon Brown (R-8, Kennewick) proposed Senate Bill 6323 in January, 2014. This bill would have changed the PDC selection provisions. The bill proposed to: a) give the two major political parties (Democrats and Republicans) the right to appoint members, and b) enable members to serve for more than one term (currently not allowed). The bill was co-sponsored by Senators Dammeier, Honeyford, Braun, Tom, Padden, Angel, Bailey, Becker, Hill, and Roach. This bill never made it out of committee¹³.

Who are the people challenging Washington's Public Disclosure Commission laws?

There are a number of out-of-state litigants who have filed suits to contest aspects of Washington State public disclosure laws. The primary litigants are the Bopp Law Firm of Terre Haute, Indiana, and the Institute for Justice, based in Arlington, Virginia. The Bopp Law Firm has been in litigation against public disclosure laws in many states and on the Federal level. Bopp describes itself as, "*The Bopp Law Firm assists political campaigns, parties, candidates, PACs and corporate/trade associations with all areas of campaign finance including, but not limited to campaign fundraising, expenditures and reporting. The campaign finance area of practice encompasses direct individual contributions, management and reporting of contributions (when necessary), formation of PACs and subsequent spending thereof*"¹⁴ James Bopp is a former Republican National Committee vice chairman.

The Institute for Justice, founded in 1991, is a non-profit Libertarian law firm that litigates in cases against public disclosure and public funding of elections in states and on the federal level. It is based in Arlington, VA, and has an office in Bellevue, WA. The seed money for the Institute for Justice was provided by the Koch Brothers.¹⁵ The Institute for Justice is a 501(c)(3) organization, so donations are tax-deductible.

The following list of cases is just a fraction of the body of work that the Bopp Law Firm and the Institute for Justice have filed, but these cases represent some of their most pertinent and high-profile suits. To see details of the cases below, please check the links provided.

These cases are involving Washington State's Public Disclosure laws:

(2009-13) *Family PAC v. McKenna, Clements, Seabrook, Noland, Joly, Sehlin* [Public Disclosure Commission/Attorney General's Office (AGO) are parties]

<http://cdn.ca9.uscourts.gov/datastore/opinions/2011/12/29/10-35832.pdf>

(2008-10) *Human Life of WA v. Brumsickle, Schellberg, Seabrook, Noland, Clements, McKenna and Satterberg* [PDC and AGO are parties]

<http://cdn.ca9.uscourts.gov/datastore/opinions/2010/10/18/09-35128.pdf>

¹³ SB 6323-2014, <http://app.leg.wa.gov/billinfo/summary.aspx?bill=6323&year=2013>.

¹⁴ "Campaign Finance." The Bopp Law Firm, n.d., <http://www.bopplaw.com/component/content/article/8-practice-areas/10-campaign-finance>, August 19, 2015.

¹⁵ "IJ Thanks Its Cornerstone Supporters," The Institute for Justice. n.d., <http://ij.org/II/november-2001-volume-10-number-6/charles-a-david-koch/>, April 26, 2016.

(2014) *Family PAC v State* <http://cdn.ca9.uscourts.gov/datastore/opinions/2014/03/19/12-35640.pdf> [Litigators on this case worked for years at Bopp Law Firm and now have formed ActRight Legal Foundation established in 2012 as a 501(c)(3) organization]
<https://actright.com/page/aboutus>

These are high profile cases in other US District Courts filed by the Bopp Law Firm:

(2009) *ProtectMarriage.com – Yes on 8 et al. v. Bowen et al.* challenged all of California disclosure provisions regarding ballot measures. <http://www.scotusblog.com/case-files/cases/protectmarriage-com-yes-on-8-v-bowen/>

(2008-9) *Republican National Committee and California Republican Party et al. v. FEC*, challenged Vermont campaign finance laws that imposed mandatory expenditure and contribution limits. http://www.fec.gov/law/litigation/rnc_08.shtml#summary

(2008-9) *Cao, Republican National Committee, and Republican Party of Louisiana v. FEC*, challenged a provision in campaign finance law restricting the ability of parties to effectively coordinate their expenditures with candidates. <http://www.campaignlegalcenter.org/case/cao-rnc-v-fec>

These are high profile cases filed by the Bopp Law Firm in the US Supreme Court. To see details of cases listed below refer to <http://www.bopplaw.com/practice-areas/31-supreme-court-practice>

(2014) *McCutcheon and Republican National Committee v. Federal Election Commission*, challenged the two year election cycle limit on total contributions an individual may make to all federal candidates, PACs, state and national political parties.

(2012) *American Tradition Partnership v. Bullock*, 567 U.S. ___, challenged a Montana law that prohibited corporations from paying for independent expenditures advocating the election or defeat of state candidates.

(2008-10) *Citizens United v. FEC*, held that corporations could not be prohibited under the First Amendment from advocating for the election or defeat of candidates.

(2007) *Federal Election Commission v. Wisconsin Right to Life*, 127 S. Ct. 2652, held that the electioneering communication prohibition had to be limited to only broadcast ads that appealed to the listener to vote for or against the candidate mentioned in the ad.

(2006) *Randall v. Sorrell*, 126 S. Ct. 2479, challenged Vermont laws which limited the amount of expenditures a candidate could make in running for state office and severely limited contributions to them.

(2004) *Leake v. North Carolina Right to Life*, 541 U.S. 1007, held that PAC contribution limits could not be applied to SuperPACs.

These are high profile cases in Washington State filed by the Institute for Justice:

(2007) *San Juan County v. No New Gas Tax*, holding that talk radio commentary is not an “in-kind” contribution. <http://caselaw.findlaw.com/wa-supreme-court/1298765.html>

(2010-12) *Many Cultures, One Message and Red State Politics d/b/a/ “Conservative Enthusiasts” v. Clements, Seabrook, Noland, Sehlin, Joly and Ellis* [PDC and AGO are parties] challenges part of Washington State's grassroots lobbying disclosure law as a violation of their First Amendment rights to free speech, assembly, and petition. <http://sites.lsa.umich.edu/admart/wp-content/uploads/sites/127/2014/07/amicus12.pdf>

(2011-14) *Farris, Recall Dale Washam, and Oldfield & Helsdon v. Seabrook, Sehlin, Joly, Clements and Ellis* [PDC and AGO are parties] challenges the constitutionality under the First Amendment of the Washington statute limiting contributions to recall campaigns. http://ij.org/wp-content/uploads/2011/06/wa-recall_ninth-circuit-opinion-affirming-preliminary-injunction.pdf

(2013-14) *Institute for Justice, Robin Farris, Recall Dale Washam, Oldfield & Helsdon v. State of Washington, Public Disclosure Commission, Ranade, Sehlin, Degginger, Turner and Doyle* challenges the definition of reportable contributions when it includes contributed legal services. <http://ij.org/wp-content/uploads/2013/06/Order-Granting-PI-IJ054448xA6322.pdf>

These high profile cases were filed in other states and in the federal courts by the Institute for Justice:

(2008) *Martin v. Brewer*, challenged Arizona’s so-called “Clean Elections Act”. <http://www.leagle.com/decision/In%20FDCO%2020150717D32/Martin%20v.%20Brewer>

(2011) *Arizona Free Enterprise Club Freedom Club PAC v. Bennett*, challenged the Arizona Citizens Clean Elections Act of 1998, which provided for public financing of candidates.

(2008-10) *SpeechNow.org v. FEC*, allowed for the creation of independent-expenditure only committees (Super PACs). “*SpeechNOW.org is a nonprofit, unincorporated association organized as a section 527 entity under the Internal Revenue Code. The Institute for Justice and the Center for Competitive Politics represent SpeechNow.org as an organization, as well as five of SpeechNow.org’s individual supporters: David Keating, Ed Crane, Fred Young, Brad Russo and Scott Burkhardt.*” David Keating is the president and treasurer of [SpeechNOW.org](http://www.speechnow.org), and also the executive director of the Club for Growth. Ed Crane is a founding member of [SpeechNOW.org](http://www.speechnow.org) and is also the founder and president of the Cato Institute.¹⁶

Proposed Changes Affecting Public Disclosure

There have been some proposals that would require more transparency with regard to personal financial statements of lawmakers. In an article in The Seattle Times dated February 22, 2014, Jim Brunner reported that “*State Legislators’ Financial Disclosures Fall Short*”:

“Unlike most data collected by the state Public Disclosure Commission (PDC) — such as information on who’s donating to political campaigns — the personal financial-affairs statements are not posted online. Such shortcomings are acknowledged by some key

¹⁶ “*SpeechNow.org v. FEC Protecting American’s Rights To Organize and Speak About Politics*”, *The Institute for Justice*, n.d., <http://ij.org/case/speechnoworg-v-federal-election-commission/>, April 26, 2016

lawmakers and even the PDC itself, which is considering changes to the system. At least 29 states make personal financial-affairs statements of lawmakers available that way, according to a 2013 report by the National Conference of State Legislatures. The PDC recently appointed an eight-member advisory committee to look at whether the F1s should be put online and whether the income codes should be updated. The PDC is expected to consider the group's recommendations this spring."

Legislation was proposed this year (2015) to require additional disclosure by lobbyists and state employees and officers concerning the acceptance of gifts and the reporting of gifts: HB 1083, SB 5383, SB 5386. These bills are currently "By resolution, reintroduced and retained in present status," which means they are stuck in committee and did not make it to the floor of the WA state House or Senate in 2015 for a vote. These bills may be revived for consideration in the 2016 Washington legislative session. HB 1083 remains in the House State Government Committee; S 5353 and S 5356 remain in the Senate Committee on Government Operations and Security. The Legislative Ethics Board requested this legislation, and it is supported by LWVWA. Go to <http://app.leg.wa.gov/billinfo/> to look up the specific bills.

Impact of Budget Cuts on the Effectiveness of the Public Disclosure Commission

Budget cuts sustained by the PDC have affected the agency's ability to be effective. The negative impact of these budget cuts are a concern for the LWVWA because of the League's position on the enforcement of the powers of the PDC. The LWVWA position on funding of the PDC (1985) is stated as "(CF-1): *The enforcement of powers of the Public Disclosure Commission should be strengthened. This includes the ability to assess higher fines. The funding level of the Public Disclosure Commission should provide for sufficient staff to audit all appropriate reports including those of lobbyists.*"¹⁷

The Washington Times printed an *Associated Press* article stating:

"The Washington Public Disclosure Commission is struggling to find the dollars to keep its informative website up to date with modern technology.

PDC executive director Andrea McNamara Doyle says the agency needs more money, not less, so it can update its online interface.

She says a cut in state funding will mean the agency will fall further behind in its ability to collect and share information with the public.

PDC chairman Grant Degginger noted that some state Senate races involved more spending than the roughly \$2 million the agency gets in an entire year to collect and disseminate campaign finance and lobbyist spending reports.

*'If you are not staying up, you are falling behind,' Degginger said of technology. "We have fallen really far behind"*¹⁸

¹⁷ "Program in Action: 2015-2017.", League of Women Voters, p.16, <http://www.lwvwa.org/pdfs/PiA13-15.pdf>.

¹⁸ "Disclosure commission struggles with budget cut", *The Washington Times*, December 26, 2014, <http://www.washingtontimes.com/news/2014/dec/26/public-disclosure-commission-struggling-to-keep-up/>, 05/28/16

The following is an excerpt from a personal email correspondence between Andrea McNamara Doyle, Executive Director, PDC, and Jackie Aase, LWVWA, member of Citizen United study committee.

[T]he budget cuts occurring during that time period were part of statewide reductions made necessary by the recession. There were several different rounds of cuts, some of which were uniform "across-the-board" cuts affecting all or most agencies, and some of which were differentiated between agencies (typically by category such as "small agency" etc.). In each case, while the Public Disclosure Commission did not "propose" the cuts, the agency was asked by the Governor's office to prepare various reduction scenarios identifying how various levels of cuts would be implemented within the agency. In other words, the agency was asked to plan for and describe the impact on the agency of, for example, a 5% versus a 10% cut, etc... The Governor, in turn, submitted proposed budgets to the legislature for its consideration that reflected reductions based on the administration's evaluation of the scenarios submitted by each agency. [Email dated March 16, 2014.]

The Governor's proposed budget for 2015 would have cut the PDC budget by 2% (about \$4 million over 2 years), which would have forced reduction of employees. In reaction to the proposed budget, PDC Executive Director Andrea McNamara Doyle said, "The agency needs more money, not less, so it can update its website."¹⁹

According to a personal email from Meghan Bunch, Fiscal Analyst for the House Appropriation Committee, to Jackie Aase, LWVWA member, there is good news. The PDC budget was not cut at all in the 2015 State budget. In fact, the Legislature budgeted an additional \$305,000 for general IT support and to purchase IT requests that were not included in the Governor's proposal. [Email dated July 6, 2015]

Note: The Washington PDC is limited to covering state-level ballot issues and elected officials only. The Commission is not able to track dark money contributions. Dark money comes from non-profit corporations, whose donors' identities are protected from disclosure²⁰:

Large donors and for-profit corporations can launder their political work through non-profits. Super-PACs focus only on politics but must disclose their donors. The 501(c) groups must not have politics as their primary purpose but don't have to disclose who gives them money. ...But it gets even more interesting when the two groups combine powers. ...Say some like-minded people form both a Super-PAC and a nonprofit 501(c)(4). Corporations and individuals could then donate as much as they want to the nonprofit, which isn't required to publicly disclose funders. The nonprofit could then donate as

¹⁹ "Disclosure Commission Toils with Old Technology, Budget Cut", *The Seattle Times*, December 26, 2014, <http://www.seattletimes.com/seattle-news/disclosure-commission-toils-with-old-technology-budget-cut/>.

²⁰ Barker, Kim, and Wang, Marian, "Super-PACs and Dark Money: ProPublica's Guide to the New World of Campaign Finance." *ProPublica*, July 11, 2011, <http://www.propublica.org/blog/item/super-pacs-propublicas-guide-to-the-new-world-of-campaign-finance>.

much as it wanted to the Super-PAC, which lists the nonprofit's donation but not the original contributors.

Additional Resource information for *Washington State v. GMA*

- *State of Washington v. Grocery Manufacturers Association (GMA)*, http://www.lwvtoolkit.org/WA_v_GMA_2013.pdf
- Ryan, Greg, "Illegal Anti-GMO Labeling Campaign Grew, Wash. AG Says": <http://www.law360.com/articles/490625/illegal-anti-gmo-labeling-campaign-grew-wash-ag-says>
- Attorney General Robert W. Ferguson, "Executive Summary and Staff Analysis – Grocery Manufacturers Association, PDC Case No. 14-002", <https://www.pdc.wa.gov/sites/default/files/meeting-resources/GMAExeSummary.10.23.2014.pdf>
- "Washington Mandatory Labeling of Genetically Engineered Food Measure, Initiative 522 (2013)", *Ballotpedia*, [http://ballotpedia.org/Washington_Mandatory_Labeling_of_Genetically_Engineered_Food_Measure,_Initiative_522_\(2013\)](http://ballotpedia.org/Washington_Mandatory_Labeling_of_Genetically_Engineered_Food_Measure,_Initiative_522_(2013))
- Brunner, Jim, "Grocery group claims its civil rights violated by Washington campaign-finance laws", *The Seattle Times*, January 13, 2014, <http://blogs.seattletimes.com/politicsnorthwest/2014/01/13/grocery-group-claims-its-civil-rights-violated-by-washington-campaign-finance-laws/>