NRSC v. FEC and Party Committee Contribution Limits in Washington State: Motivations and What It Means for the PDC

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Introduction

The contemporary history of campaign finance regulation in the US is primarily characterized by the laws enacted in response to the 1974 Watergate scandal. Washington State campaign finance disclosure laws, however, predate Watergate and were enacted through a statewide citizen initiative in 1972, which also created the Washington State Public Disclosure Commission. Twenty years later, in 1992, another citizen initiative succeeded in establishing contribution limits on the donations made by individuals, businesses, and unions to candidates for public office. Washington State continues to be a leader in state campaign finance regulation, though the regime at large faces continued pressure from opponents.

Today this regulatory industry is primarily characterized by the challenges to its very existence. Lawsuits have been waged against federal campaign finance regulations and their enforcer, the Federal Election Commission, since its inception. These challenges continue, most recently with the soon-to-be decided *National Republican Senatorial Committee v. Federal Election Commission*. A coalition of states filed an *amicus* brief in support of the coordinated expenditure limits at risk in the case, encouraging the Supreme Court to uphold its 2001 decision in *FEC v. Colorado Republican Federal Campaign Committee*. The *Amici* States write that if the 2001 decision is overruled, the federalist system that allows them to enforce their own jurisdictional campaign finance regulations will suffer.

Considering this potential risk, I have wondered what the potential impacts to the Washington State campaign finance system could be. A central question has been rooted in state-level context, researching if and where the state party committees reach their candidate

contribution limits. This has required analysis of the state's current laws and included case study analysis of state party committee contributions to 36 state House candidates in the 2024 election, as well as interviews with current and former state officeholders, campaign operatives, and subject matter experts.

In Washington State, data and interviews suggest that it is highly unlikely that the state's campaign finance system will face challenges, for multiple reasons. First and foremost, the state law itself does not have a coordinated expenditure definition in statute. Secondly, the state party committees allegedly do not have the fiscal firepower to max-out their candidate contribution capacity, and in most races, they do not need to. Finally, Washington State is currently under Democratic control in the Executive, Legislative, and Judicial branches, and private wealth in the state is more aligned with the Democratic Party, suggesting that elimination of contribution limits to candidates would harm the current minority, the Republican Party.

Campaign Finance Regulation in Washington State

1972

In 1972, Washington State voters approved Initiative 276, with 72% of voters in favor of the initiative. The initiative established the Washington State Public Disclosure Commission, charged with interpreting and enforcing the campaign finance and disclosure laws of the state, enshrined in Title 29B RCW and WAC 390 ("About," PDC). Citizens concerned about money in politics in the 1970s joined together as the Coalition for Open Government, which coordinated the signature drives that eventually secured Initiative 276 on the 1972 November ballot ("PDC at a Glance," PDC).

1992

In 1992, voters again organized initiatives on campaign finance and disclosure issues, this time enacting contribution limits through Initiative 134 with a 72% margin in favor. Two alternative proposals had been floating around during this time period, one being promoted by the League of Women Voters and Common Cause ("Voters Can Accomplish What Lawmakers Failed," *The Seattle Times*, Jan. 6, 1992), and the other promoted by Republican State Senators Linda Smith and Jeanette Hayner, as well as aligned corporations, including Paccar Inc., Phillip Morris USA, BP America, Burlington Resources, Weyerhaeuser, and the Tobacco Institute, as reported by Jim Simon for *The Seattle Times* (January 3, 1992).

Simon writes that the political parties in 1992 were coming from the same place on the issue, and "trying to protect the flow of cash from key contributors. And the special interests that activists rail against are playing a major role in shaping and financing the proposals." The initiative placed contribution limits on donors, including individuals, companies, unions, and political action committees, as well as limiting party and caucus contributions, candidate-to-candidate transfer, and restricted taxpayer-funded mailings by officeholders (Jan. 3, 1992). Linda Smith herself denied that her favored proposal was partisan and said that "the reforms are aimed at eliminating the incumbent advantage and forcing candidates to raise most of their money from individuals rather than special interests."

The January 3 editorial from *The Seattle Times* argued that "the money behind the effort says otherwise," citing the Senate GOP Caucus Director Martin Flynn's work in strategic advising. Flynn himself said, "there's no doubt that Republicans are behind this. And we think the end result benefits Republicans because we rely on individuals more."

Today

The PDC and the laws it was charged with enforcing through Initiatives 276 and 134 are still on the books, having been minorly amended through the years, but not having gone unchallenged. Total staffing today sits at 34 full-time staff, and within the last two months, the PDC has reached its five-member commissioner threshold. Two recent appointees were placed on the commission by Governor Bob Ferguson: attorneys Teebah Alsaleh and Matt Segal, serving alongside commissioners J Robert Leach, Douglass North, and Jim Oswald. Additionally, the agency has worked alongside the family of Jolene Unsoeld, considered to be "the mother of the PDC" and Washington's disclosure laws, to create the Jolene Unsoeld Public Policy Internship. This report is the first iteration of the culmination of my time in the internship.

Campaign Finance Regulation in the United States

Pre-1974

The Federal Election Commission maintains an interactive timeline of its history, listing two items before 1974. The Revenue Act of 1971 allowed citizens to choose if the federal government could use their taxes for public financing of Presidential campaigns, specifically in the general election. The second pre-1974 item is the Federal Election Campaign Act (FECA) of 1971, which "subsumed previous campaign finance statutes, such as the 1925 Corrupt Practices Act" (Garrett 2016). The act created the requirement of full reporting of funds spent and raised by campaigns and outlined the "legal framework for establishment of separate segregated funds by corporations and labor organizations," as well as limits on advertisement spending and personal fund usage ("FEC historical timeline," FEC). The FECA of 1971 also outlined the creation of political action committees (Dunbar 2017).

Watergate and the FECA

In 1972, a group of men hired to burglarize the Democratic National Committee headquarters were caught by a man on night watch. The men were hired by a committee dedicated to re-electing former President Richard Nixon, called the Committee to Reelect the President (CRP), and had been working in coordination with Nixon and his staff (2010, Hartman). This prompted Congress to take up a series of amendments to the original FECA in 1974. These amendments established contribution and spending limits for campaigns, in addition to creating the Federal Election Commission.

Garrett writes that after the 1974 amendments, "the first in a series of prominent legal challenges (most of which are beyond the scope of this report) came before the Supreme Court of the United States." The case was *Buckley v. Valeo* (1976), through which the Court invalidated spending limits, excluding those of publicly financed presidential campaigns and invalidated the original FEC.

The FECA amendments of 1976 then reformed the FEC and enacted a series of new contribution limits. The last significant amendments to FECA were with the 1979 amendments which streamlined reporting standards for political committees and individuals. Few changes were made to FECA after this point, as the focus of Congress during the 1980s and 1990s was on special interests and political action committees. This focus eventually illuminated FECA loopholes that lead to the Bipartisan Campaign Reform Act (BCRA), also known as the McCain-Feingold Act, being signed into law in 2002 (Garrett pp. 3-4).

Roberts Court Campaign Finance Jurisprudence

Prior to current Supreme Court Chief Justice John Roberts taking the bench in 2005, the Supreme Court had upheld the BCRA in the facial challenge of *McConnell v. FEC* (2003). The

Roberts Court, however, has been particularly characterized by its conservative jurisprudence, following a similar pattern to the Rehnquist Court (*Justia*). Marcia Coyle writes for the *Constitution Center* blog, describing how the justices have almost total control of the cases they review per term, with only four votes needed to initiate the process (2021).

In *Randall v. Sorrell* (2006), the Supreme Court ruled that Vermont's limits to campaign contributions were unconstitutional and in violation of the First Amendment. The 2007 case *Federal Election Commission v. Wisconsin Right to Life, Inc.*, saw the Court revise its decision regarding issue ads in *McConnell v. FEC*, "saying that limits on electioneering spending by nonprofits were unconstitutional." 2010 had *Citizens United v. FEC*, where the Court ruled that independent expenditures by businesses and unions were protected First Amendment speech, with this decision then being applied to *SpeechNOW.org v. FEC*, with "arguments claiming unlimited independent expenditures would lead to corruption" invalid after *Citizens United*.

The 2012 case *American Tradition Partnership v. Bullock* ruled that *Citizens United* applied to a Montana statute that which had banned direct corporate political spending. In 2014, the Court heard *McCutcheon v. FEC* and ruled that "aggregate contribution limits infringed on First Amendment rights," lifting the cap on the amount that could come from any single donor to a candidate or party committee. In 2022, the Court ruled in *FEC v. Ted Cruz for Senate* "that a BCRA provision limiting the monetary amount of post-election contributions a candidate could use to pay back personal campaign loans impermissibly limited political speech and violated the First Amendment (*Ballotpedia*).

NRSC v. FEC

The Petitioners

In *National Republican Senatorial Committee v. FEC*, initially challenged in Ohio federal court by then Senator JD Vance and former Representative Steve Chabot, the NRSC is calling into question the FEC's coordinated expenditure limits. The Court had previously upheld the limits in *FEC v. Colorado Republican Federal Campaign Committee* (2001), and the NRSC in this most current case is encouraging the Court to overrule its previous decision. Noel Francisco, arguing the case for the NRSC in front of the Court, said the limits are "at war with this court's recent First Amendment cases," reports Amy Howe for *SCOTUSblog* (2025).

The Defendants

The Court appointed former clerk of Chief Justice John Roberts, Roman Martinez, to defend the limits and the ruling made by the US Court of Appeals for the 6th Circuit. Chief Judge Jeffrrey Sutton, writing for the 6th Circuit said that "because the Supreme Court has not overruled its 2001 decision… the 6th Circuit was required to reject the plaintiff's challenges (Howe). Martinez called on the Court to throw out the case, citing a lack of standing. His brief said that Vance has denied any plan to run for president, that the NRSC and NRCC did not have the right to sue, and that there is no "real prospect that the FEC would enforce the restrictions against Vance, because Trump has issued an executive order barring the FEC from enforcing the limits."

Discourse

Analysis provided by Perkins Coie Managing Partner Brian Svoboda and Associate Mikael Floyd sketches out a series of paths the Supreme Court could take in its ruling. The Court could: 1) strike down the party coordinated expenditure limits, "as it did with the individual

aggregate limit in *McCutcheon*," 2) strike down the coordinated expenditure limits broadly "and allow nonparty, noncandidate groups to also make unlimited coordinated expenditures," 3) defer or dispose of the case on jurisdictional grounds, or 4) uphold the limits (March 12, 2026). With regard to option two, the authors mention the scholarship of constitutional law professor Richard Pildes. Svoboda and Floyd bring up how "a central question in the case is whether the First Amendment protects unlimited coordinated spending by parties, but not by others." According to the authors, Pildes has contended "that the strength of the associational interest between parties and their candidates justifies different treatment under the First Amendment."

Elena Schneider and Andrew Howard reporting for *Politico*, interviewed a Republican Party consultant, Brock Lowrance, who said "it's actually just a more efficient use of resources and contributions of donors" to eliminate the coordinated expenditure limits. Interviewing a House Democratic strategist, they predict that if the limits are eliminated "House races will become 'longer, more drawn out campaigns' that 'feel more like Senate and governor races." Based on their interviews, both parties are actively preparing contingency plans for how and when the Supreme Court makes its ruling (February 2, 2026).

Determining Impact

State Party Committee Contribution Limits to Candidates

To dive into this matter, my internship advisors and I devised a central question as a window into the subject. With coordinated expenditure limits at risk in the case, the *Amici* States in their brief supporting the coordinated expenditure limits say that they wish "to maintain the flexibility under our federalist system to construct campaign finance schemes that are best suited to local needs and history. A decision in the petitioners' favor in this case threatens to constrict that leeway and could call various states' laws into doubt. The Court should give weight to the

states' reliance on the Court's longstanding precedents and avoid needlessly upending this landscape" (pg. 2).

One avenue to analyze the potential long-term risk at the state level was to investigate our own state party contribution limits to candidates to assess party spending on state races. While the state's campaign finance laws do not explicitly define coordinated expenditures, the risk alluded to by the intervening respondents is a nebulous one, one that could seemingly throw any state-level limits into disarray or open them to challenge. For that reason, I asked: do the official state party committees reach their total candidate contribution limit?

For the most recent data collected, I analyzed the PDC records of state party committee contributions to candidates for state House in 2024, zeroing in on nine districts with direct party opposition in their races.

Data Analysis

Swing Districts: Legislative Districts 10, 26, and 42

The state party committee contribution data compiled on the six candidates for 2024 state House in my "Swing District" (Figures 1-12 in the Appendix) category shows a couple of significant trends. An overall main takeaway is that there are clear cases where the state party committees do nearly reach their limit, specifically the HDCC in this set of districts, coming the closest to its limit in contributions to Addison Richards, followed by Joe Timmons.

1. In all cases, the Republican party gave less to their candidates than the Democratic party, revealing a large gap in Republican contribution capacity.
2. Where Republicans received money, it was not from all possible official party aligned campaign committees.

3. Certain Democrats, on the other hand, received funds from all possible official party campaign committees within the state.
4. The largest contributor to all Democratic candidates was the House Democratic Campaign Committee (HDCC), not the state party.

Liberal-Leaning Districts: Legislative Districts 24, 34, and 49

The state party committee contribution data compiled on the six candidates for 2024 state House in my "Liberal-Leaning District" (Figures 13-24 in the Appendix) category reveals an overall insignificant number of state party committee contributions to candidates of either party.

1. In LD 24, Democratic candidate Bernbaum received funding from all possible state party or official party affiliated committees, the number one Democratic candidate recipient in this set, for a total of $26,572.37.
2. Also in LD 24, Republican candidate Roberts received funding from the LD or county party committee sources, in addition to being the only recipient of House Republican Organizational Committee funds in this, and the overall number one Republican recipient of state party committee contributions for a total of $15,000.
3. Half of the Republican candidates in this data set received no funding at all from any official state party or campaign committee contributor.
4. 2 of the Republican candidates in this set only received funding from either their LD committee of candidacy or county party central committee.
5. Excluding Bernbaum, Democrats overall received small amounts of funding from these 4-5 state party campaign committee sources, all with a total range spanning only $60-$1,500.

Conservative-Leaning Districts: Legislative Districts 9, 16, and 19

The state party committee contribution data compiled on the six candidates for 2024 state House in my "Conservative-Leaning District" (Figures 25-36 in the Appendix) category reveals an overall insignificant number of state party committee contributions to candidates, similar to the "Liberal-Leaning" category.

1. In the Dye v. Miller race, as well as the Klicker v. Gunshefski race, the incumbents took no direct contributions or did not have them recorded from the state party, House or Senate campaign caucuses, or the legislative district or county committees.
2. For all 6 Republican incumbents within this category, any money received from a party source mostly came from the legislative district or county committees, not the state party. Some candidates did receive small amounts from their House campaign committees, but all party committee contributions to this set of Republican incumbents remained under 750 dollars.
3. For all the Democratic Party challengers within this category, candidates received contributions from both the state party and their county party committees, with the county committees contributing the majority of their party-sourced funding, surpassing the party contributions that were made to the Republican incumbents.

Interviews

After analyzing state party committee contributions to the 36 candidates selected, further questions were raised as to why the state party committees do not reach their contribution limit. At this stage, I contacted a number of current and former state officeholders, former officeholders, party officials, and subject matter experts in the field of political science to find out 1) the drive behind the *NRSC v. FEC* case, 2) why state party committees do not meet their

contribution limit, and 3) their assessments of potential future challenges to state jurisdictions with campaign finance limitations in place.

Former State Senator Karen Fraser

Karen Fraser served in the Washington State Legislature from 1989 until 2017, primarily as State Senator for the 22nd Legislative District for the latter 24 years of her tenure. A current trustee of the Evergreen State College, as well as one of the creators behind this internship, I interviewed Fraser on the matter.

Speaking to the subject of copycat litigation at the state level, Fraser thought that there could be a big push at the state's limits, saying "the conservatives will make the argument," especially if the Supreme Court overrules the federal coordinated expenditure limits:

> All limits, regardless of category, will be vulnerable. Republicans will likely want to overturn the state limits as a matter of principle. I think the real limits to worry about would be the personal, individual contribution limits.

As for why the state party committees do not meet their total contribution limit in Washington State, Fraser argued that "most people want to give to the candidate of their choosing, rather than give to the party, which then decides where your money goes" (K. Fraser, personal communication, May 17, 2026)

Thurston County Republican Party Chair Corey Gauny

Corey Gauny is the current Chair of the Thurston County Republican Party and a former emergency services manager with the US Air Force. In response to my question about the motivation behind the federal challenge, Gauny highlighted the First Amendment at the center of the issue, comparing this current issue to that of "Super PAC's back in the 80's when Tip

O'Neill and Newt Gingrich pushed to give corporations lobbying power." Expanding on potential economic factors, Gauny said:

> 1. Due to inflation, you don't get as many campaign services for the same dollars as you did in the past, 2. Consultants and campaign service providers stand to gain significantly from this ruling, 3. You must pay for tasks that volunteers do not complete. Running a campaign is very expensive when you consider the effort required to promote your name and message.

As to why the state party committees do not reach their contribution limit in Washington State, Gauny writes that it is likely due to multiple reasons, and thus, harder to delineate:

> 1. Local races do not need as much money as national campaigns because the target is much smaller. 2. Local parties do not raise a lot of money, so we must be strategic about how and where we contribute funds.

Continuing, he writes:

> For some of the more high-profile races, most campaign funding comes from PACs because they tend to generate significantly more revenue. This is because they either have a 501(c)(4) that represents a 501(c)(3) or they allocate a portion of union dues or membership fees to their lobbying arms. This supports the argument that lobbyists have more impact on candidates than the candidates' own party does.

On future challenges at the state level, Gauny says the straightforward answer would be yes, "as there would be precedent," though it raises the question of funding the legal challenge. "Cases would likely need to be brought up in each state and funding would have to come from within that state" (C. Gauny, personal communication, May 26, 2026).

Deputy Secretary of State Randy Bolerjack

Randy Bolerjack is the current Deputy Secretary of State in Washington State and was suggested to me as a good resource by the Washington State Democratic Party when I attempted to contact them for comment. He has also spent time working in higher education, public affairs, and communications. Bolerjack responded to my interview questions, speaking solely on his own personal behalf, not representative of his official government role

To Bolerjack, the main motivation behind the case is money. “So much of politics is about who has the money. The RNC currently has more money than the DNC does. If they see opportunity, then it is to their benefit to open the floodgates.”

As for why the state party committees do not reach their contribution limits in the state, he says it is “because the dollars just aren’t there.” Contribution limits, however, “won’t exist if they do something like this.” It may not be just the viewpoint of one party either. Bolerjack says that finding loopholes for election spending are part of the strategy, and “if you were the RNC, you are going to do that. If Democrats had the money, they would want to use it. A similar thing happens with redistricting… it can often work against the party when roles are reversed.”

On the topic of potential copycat litigation, Bolerjack says there is potential, and would not entirely rule it out. “If the parties think it would be to their advantage, they might have that conversation.” Bolerjack brought up the Supreme Court’s May 2026 ruling in *Louisiana v. Callais*, and how following this decision, Washington State saw immediate challenges to the drawing of what is now the 14th Legislative District, redrawn in 2024 (Cornfield, 2024, 2026). A similar situation “just depends on if there interested party in raising the question… this could be in five years, or it could be immediate.”

The bigger question in Bolerjack's opinion "would be if the Republicans or Democrats see an advantage," as the State Republican Party "does not raise that much money or help their candidates much" (R. Bolerjack, personal communication, May 27, 2026).

Former campaign manager for State Senate candidate Maria Beltran, Vanessa Ponce

Vanessa Ponce is currently the Executive Director of the Washington Student Association but has spent time working as an aide in the legislature, as well as a campaign manager for former State Senate Candidate for the 14th Legislative District, Maria Beltran.

As a former campaign operative, Ponce's views the reason the state party committees do not reach their limits in Washington State as due to split priorities, with focus going to swing districts, while also acknowledging some of the reason is likely due to the high dollar amount the limits are set at.

Ponce believes that what motivates the legal challenge is connected to the desire for influence of certain high net-worth individuals, citing the involvement of billionaire Elon Musk in the recent Wisconsin State Supreme Court race.

Speaking to potential future litigation, Ponce says that she believes "it is definitely an option on the table," as the Court finishes out its term, citing recent follow-up litigation after Supreme Court rulings (V. Ponce, personal communication, June 5, 2026).

Political scientist Dr. Robin Kolodny

Dr. Robin Kolodny is a political scientist, professor, and political commentator currently working at Temple University in Philadelphia, PA. Kolodny's specialty is in US campaign finance, political parties, and electoral systems. In 2024, Kolodny, along with her co-author Dr. Diana Dwyre, released *The Fundamentals of Campaign Finance in the US: Why We Have the System We Have.*

After introductions, Kolodny opened our conversation by saying that one of the "only times I have ever agreed with Clarence Thomas" was in Justice Thomas's partial dissent in *Colorado Republican Federal Campaign Committee v. FEC* (1996), where Thomas says that he fails to see how it is possible for a political party to corrupt its own candidate. Kolodny said that after this case, when the party's won the right to independent expenditures, it made coordinated expenditures "besides the point," even though there are still hard money and donor limited amounts, while no limit to the amount that can be spent.

Other points Kolodny raised were the effect on advertising, saying that it will likely look very different due to candidate's likely near-future control over messaging and image with the removal of coordination limits. To a certain extent, Kolodny says, the parties have likely already been circumventing coordination rules through their shared utilization of joint fundraising committees. On the topic of state level changes that could be seen, Kolodny quickly browsed the National Council of State Legislatures website and stressed the fact that in half of US states, the state party committee contribution limit is unlimited. Broadly, there will be no change.

Kolodny acknowledged the fact that this case affects federal limits on coordinated expenditures but engaged with the debate around potential future impact to state regimes. "Could states argue that the state party should not have [limits]? Yes, but that is not of great if there such slack" already built into the limit system. Additionally, without parallel regulations on "coordination," there "may not be anything to sue over," at least on the grounds of this case.

In more lopsided state legislative races, Kolodny says it is more likely to see both parties stay out of the race financially. If there are few competitive districts due to gerrymandering, "then it all doesn't matter." Speaking directly to the effect on states with limits, Kolodny believes it is "low on the agenda and would be more of a concern in competitive places."

Overall, Kolodny says that "the sky already fell" and independent party expenditures were the beginning of the end on the matter. "When coordinated limits fall, there will be no difference. Anything the party now considers independent will just be coordinated" (R. Kolodny, personal communication, June 4, 2026).

Political scientist Dr. Diana Dwyre

Dr. Diana Dwyre is a political scientist and professor currently working at California State University in Chico, CA. Dwyre's specialty is in US campaigns, elections, and Congress. In 2024, Dwyre, along with her co-author Dr. Robin Kolodny, released *The Fundamentals of Campaign Finance in the US: Why We Have the System We Have.*

Dwyre was unsurprised by my findings and corroborated them. Drawing parallels to federal trends, she says, "Parties think candidates are bad at spending money, and the party thinks that it will do a better job. Any race that's not competitive - the party is not going to waste money on it."

Before the 1980s, at the national level, the parties were not very efficient in their spending, Dwyre says. Today, in a campaign environment with an endless army of super PACs, parties have more competition with these groups and, therefore, must spend strategically. The easiest way to do this, Dwyre says, is for them to control what that spending looks like.

When considering the prospect of future state-level challenges, Dwyre said that she "absolutely anticipates there will be decisions or challenges in the states with limits." Specifically, in Washington State, Dwyre says that in the immediate aftermath, it is likely that nothing will happen. Returning to my first question regarding the motivations of *NRSC v. FEC*, Dwyre said:

> For a pretty long time, especially since *Citizens United* and *SpeechNOW*... Parties have lost a lot of influence on the way money is flowing. This case would change the flow of money. Independent expenditures just are not as good, and parties prefer the coordinated method... Unleashing the parties by eliminating coordinated expenditure limits would change the finance ecosystem... That is driving it theoretically.
>
> The Republican Party has more money and has had more success fundraising than the Democratic Party – individual Democratic candidates still outraise Republican candidates – this [eliminating coordinated expenditure limits] will help them most immediately (D. Dwyre, personal communication, June 16, 2026).

Washington State House of Representatives Democratic Caucus Member

I spoke with a member of the House Democratic Caucus who was willing to answer my questions on the condition of anonymity. Speaking to the drivers of the case, the member said the case seems to be about the consolidation of power, adding that "the party wants to control their candidates more than they are currently able." Further, the member pointed out the current cash advantage of the Republican Party on the national level, compared to the financial issues of the Democratic Party, lending the former an upper hand if coordinated expenditure limits are eliminated.

In acknowledgement of the House Democratic Campaign Committee generally spending more than the state party in my candidate data, the member described it as a structural factor. They said that the emphasis on raising money has been on caucus committees, which eventually surpluses a sizable portion of candidate-fundraised dollars. This is generally seen as a sign of goodwill and helps out the caucus overall, as the caucus can dedicate more dollars to maintaining its number of seats, and ideally, majority.

The member considered the question about future legal challenges, concluding that any state-level limits likely would not be challenged until politics in the state swing further to the right. The member highlighted the current HDCC cash advantage and added that it would be very unlikely that the Democratic Party would challenge the state's contribution limits.

Former Secretary of State of Washington Sam Reed

Sam Reed was Secretary of State for Washington from 2001 to 2013, previously serving as Thurston County Auditor since 1978, and before that was Assistant Secretary of State. His time in office was characterized by bipartisanship, expanding voter access, and transparency, having played a part in the establishment of the Public Disclosure Commission.

Similar to Dwyre, Reed was unsurprised by my findings, noting the high party committee-to-candidate contribution limit. To my first prompt, Reed said:

> Particularly, at the federal level, there is so much money involved, so there is interest in removing limits to spend more. It is a plain fact that they [the parties] would like to throw more money into races.

Beyond the high state party committee contribution limits, I asked the former Secretary of State if he thought there were other reasons the party committees do not spend to their total capacity:

> Independent expenditures. If people want to pump a lot of money into a race, instead of going through the party, they will use the independent expenditure route. The groups that come the closest [to the limit] are probably the caucus campaign committees.

To my final question, Reed said he thinks it is "quite possible" that state limits could be challenged if the Supreme Court overrules its 2001 decision and strikes down coordinated expenditure limits. In parting, Reed said:

> After all my experience, I concluded that money is like water that runs downhill. Money in politics is going to happen. There is too much at stake and too much interest. Limits have not always been the most consequential, as people with money can work around them. Even if there is not a limit, there should be transparency. The public has a right to know, as it said in the initiative that created the PDC (S. Reed, personal communication, June 17, 2026).

Conclusion

Based on the interviews conducted, the data analyzed, and the legal dimensions of the Washington State campaign finance and disclosure laws, I predict that it is highly unlikely that the current formation of state party committee contribution limits to candidates will face short-term impacts based on the Supreme Court's impending ruling in NRSC v. FEC. Bolerjack's point about the parties needing to see an advantage prompted me to test my own analysis with Kolodny, informed by a conversation I had with the *Washington Observer's* Paul Queary. To Dr. Kolodny, I posed my summative hypothesis, that with A. such high state party committee contribution limits to candidates, B. the fundraising hardship for the Republican Party in the state, alongside C., the likelihood that more money in the state is aligned with the Democratic Party, it would not be advantageous to the state Republican Party to challenge these limits.

With limited time to investigate every race in 2024, or to attempt and track patterns within 2024 independent expenditures, I cannot definitively conclude that either party in the state has no interest in invalidating the limits. If I had more time, I would analyze this issue further and expand my research in the 2024 House race to strengthen my empirical analysis.

The other issue at hand is the fact that the central case is concerning federal, coordinated expenditure limits, whereas the topic of my state-level campaign finance investigation has been party-to-candidate contribution limits. Every Washington State House candidate that I researched received the majority of their funding from outside the state party committees at the heart of my research, leading me to conclude that it is unlikely that eliminating these limits would be a priority for either state party in Washington. Additionally, interviews conducted suggest that maxing out the party-to-candidate contribution limit is difficult for both parties in the state due to lack of funds and the prioritization of competitive races, implying that the currently high limit does not pose a problem to the party funding of candidates.

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Appendix

Figure 1

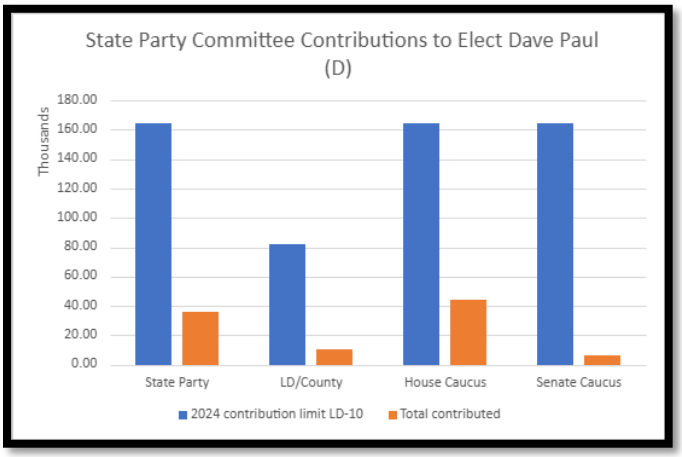


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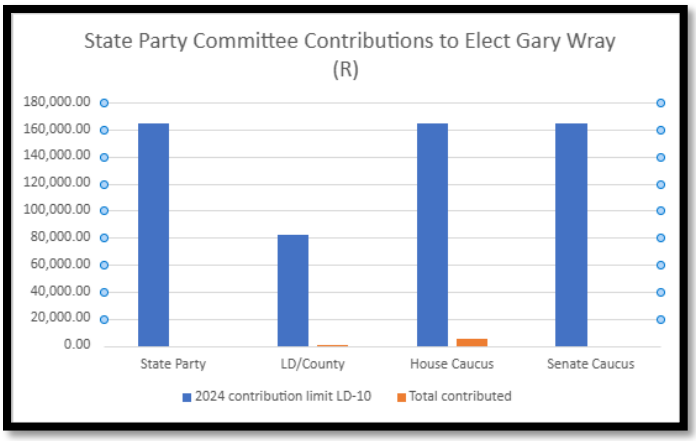


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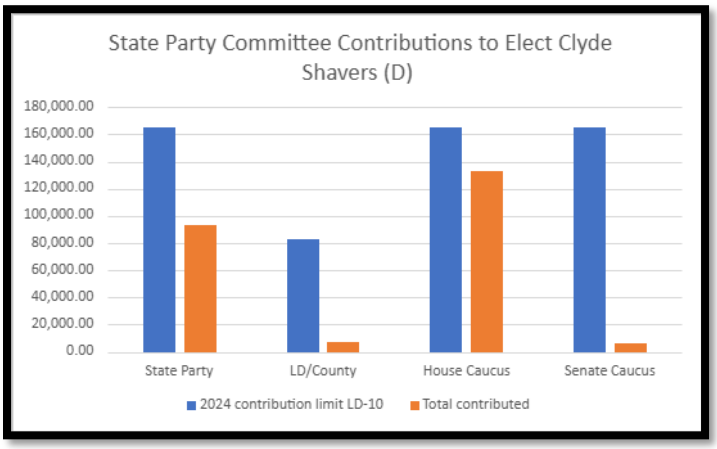


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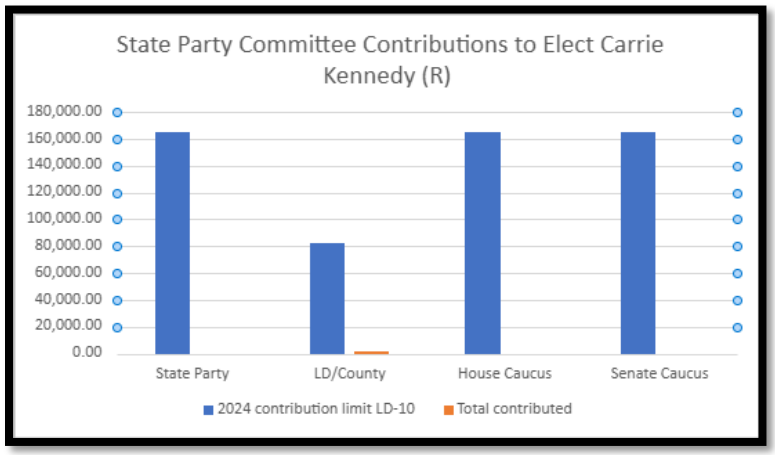


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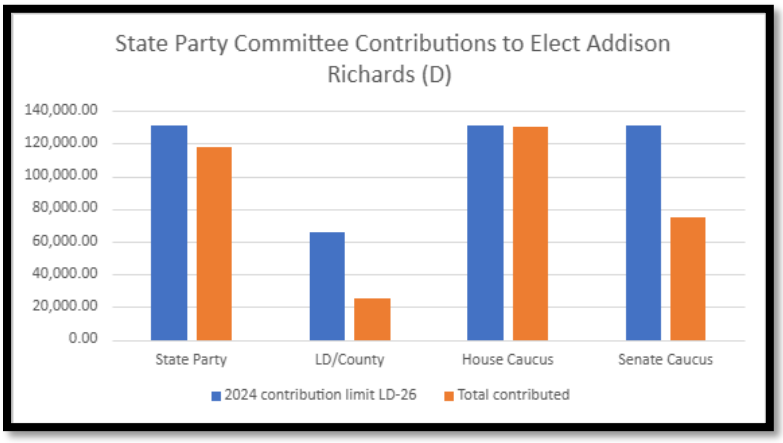


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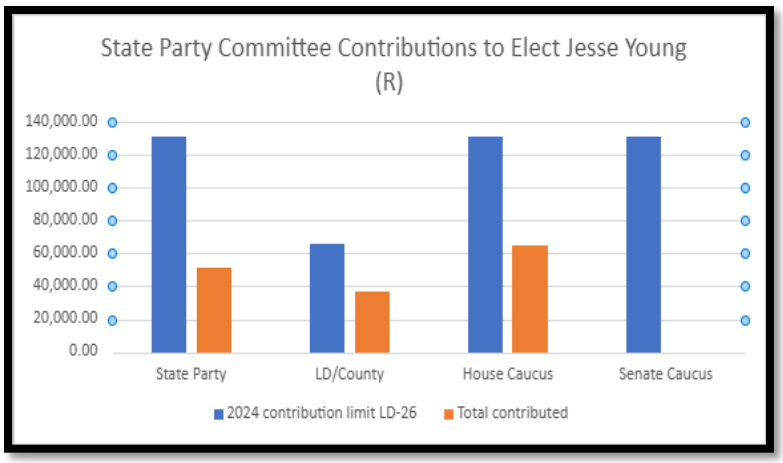


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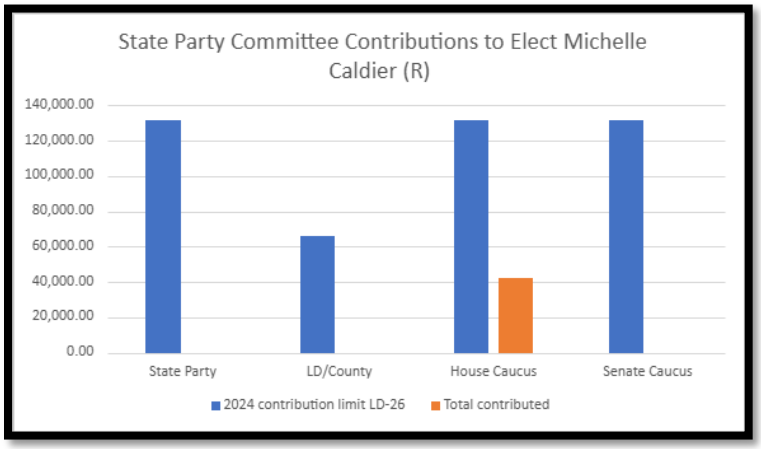


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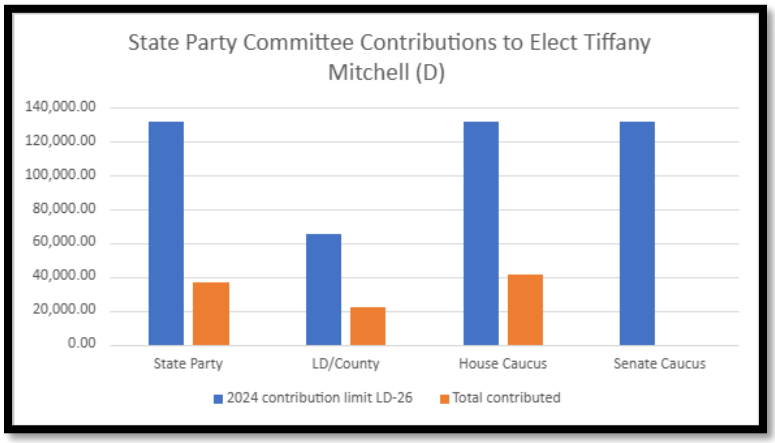


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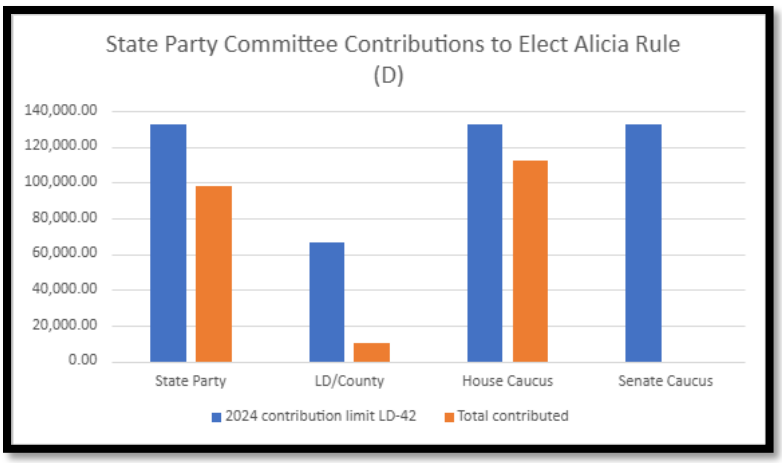


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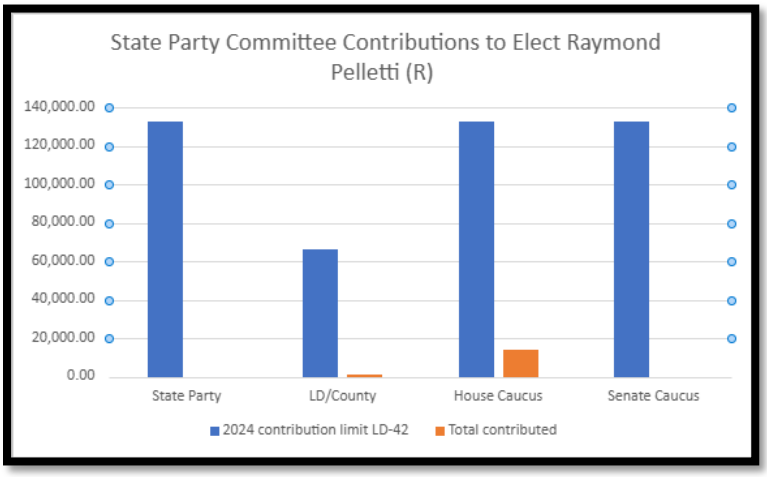


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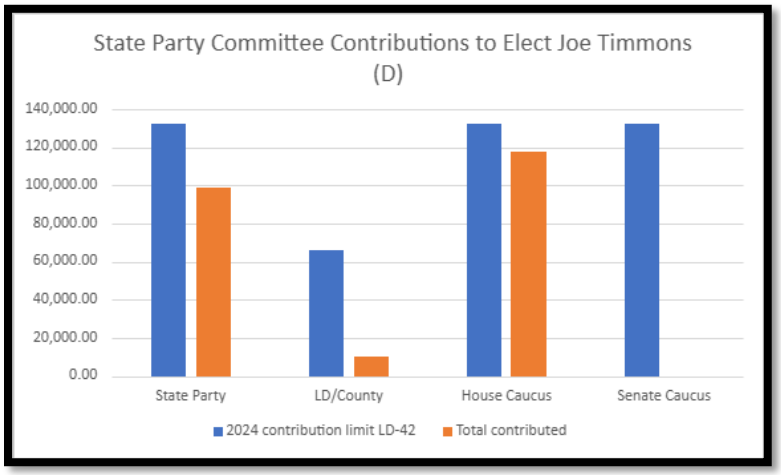


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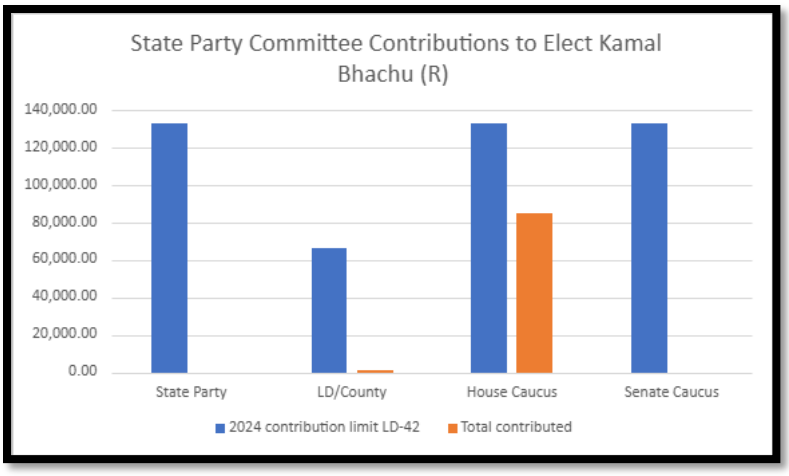


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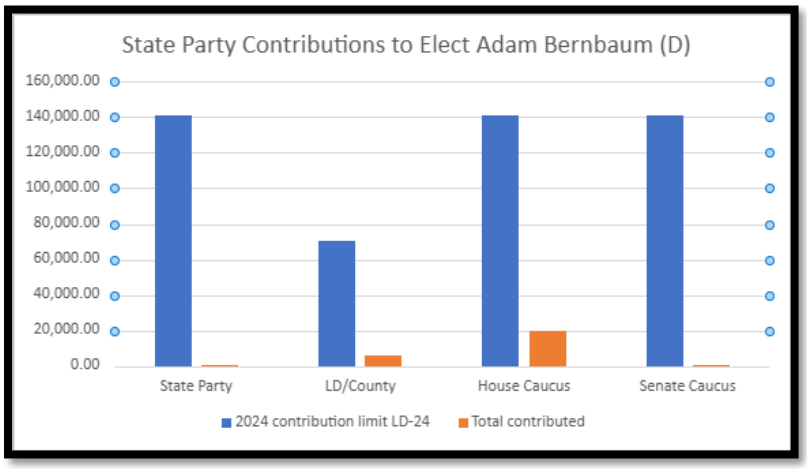


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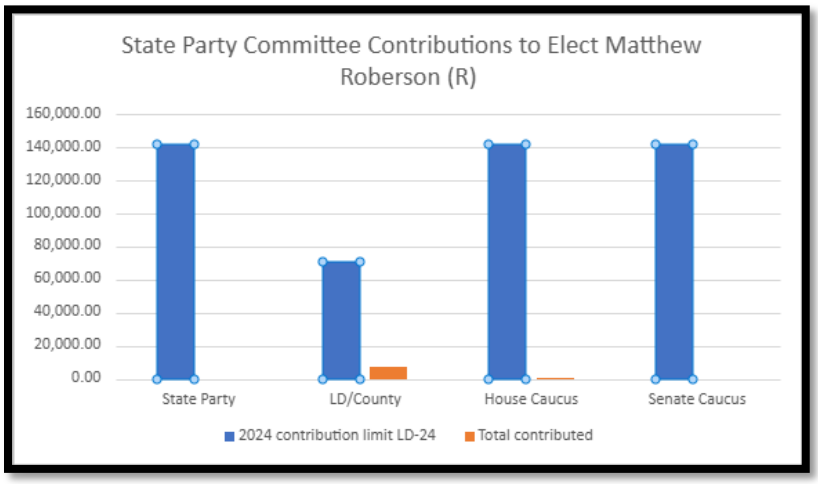


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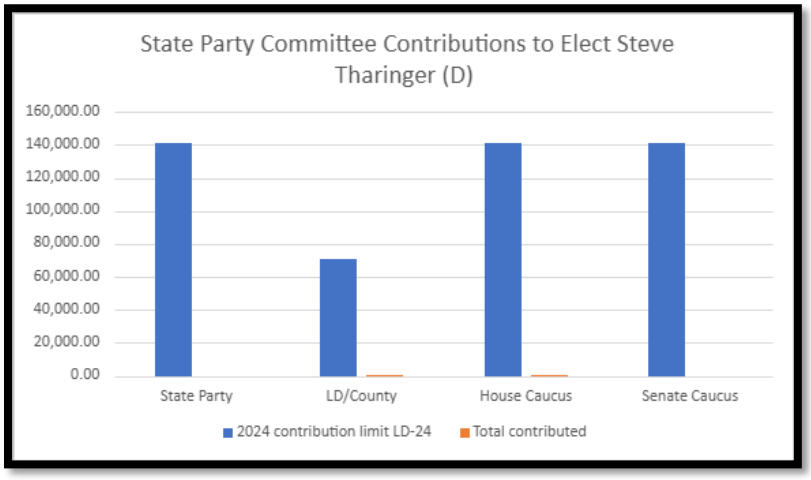


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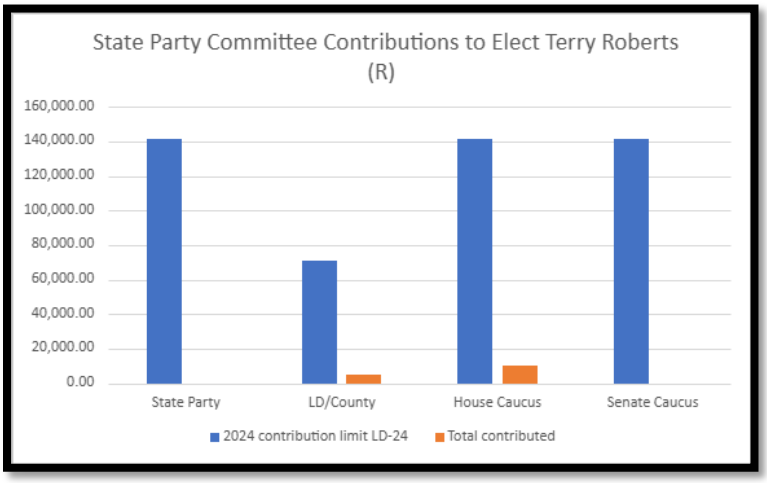


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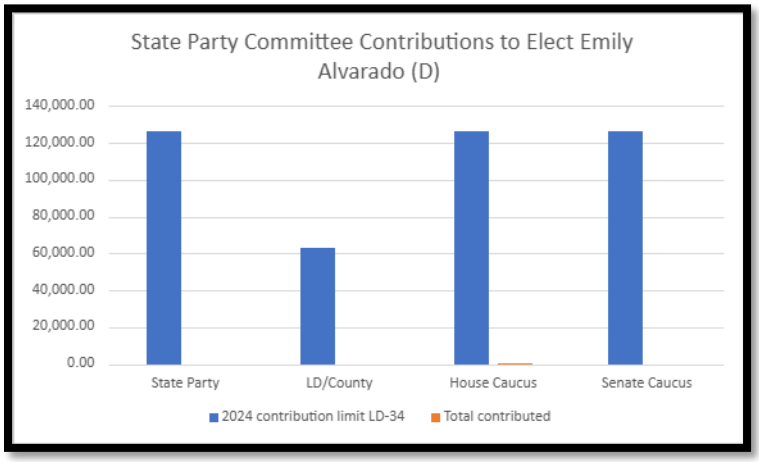


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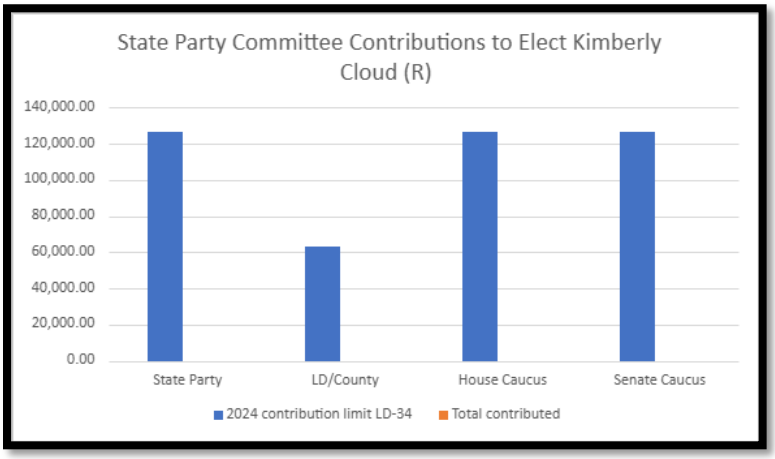


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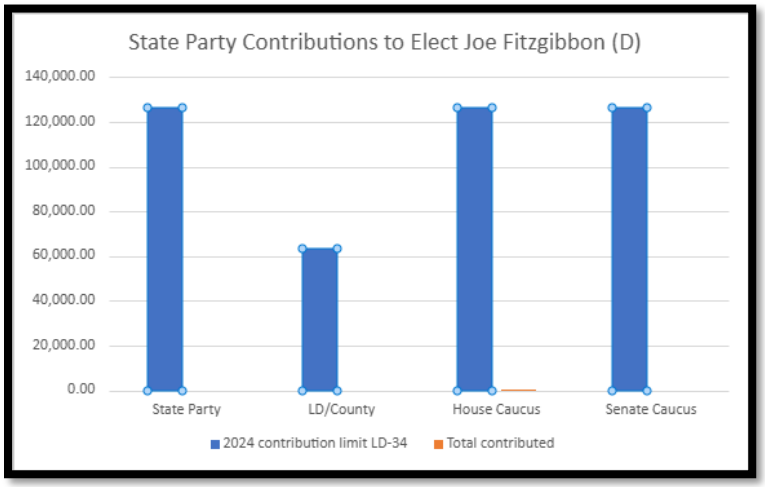


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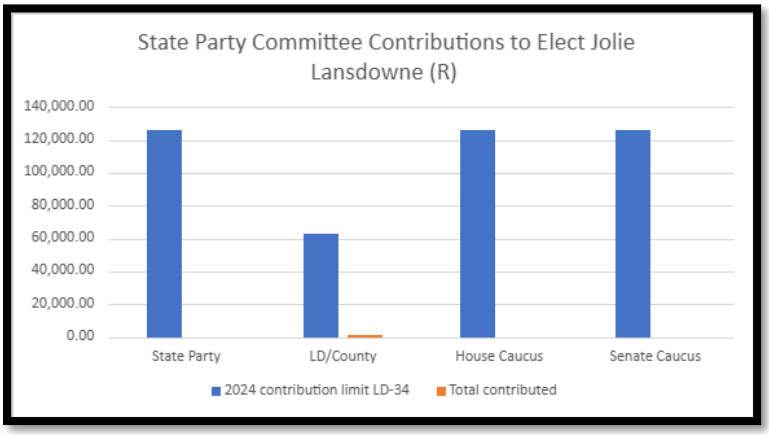


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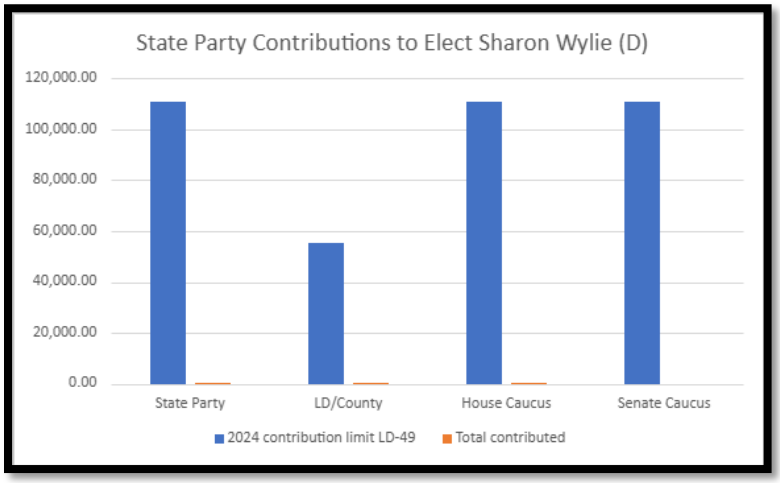


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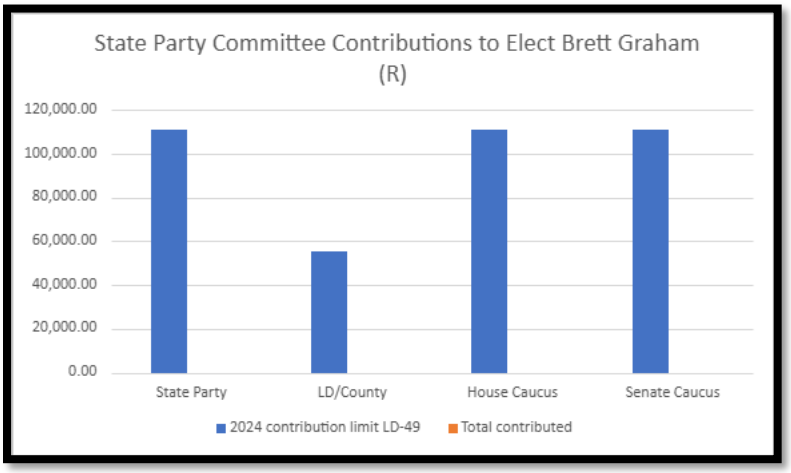


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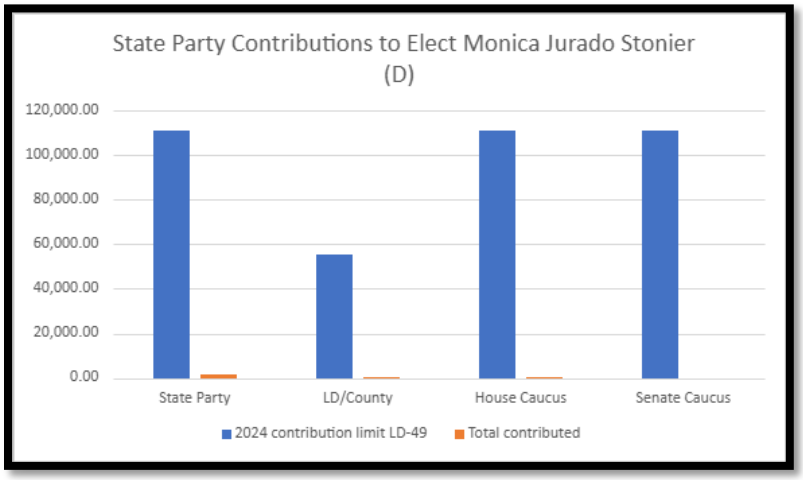


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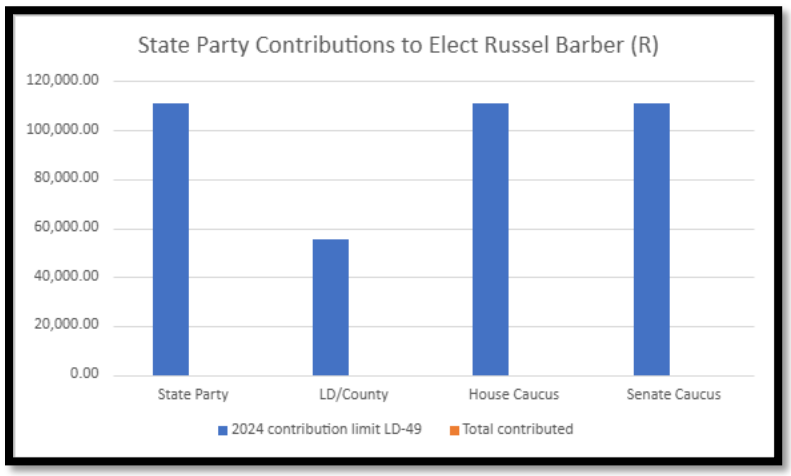


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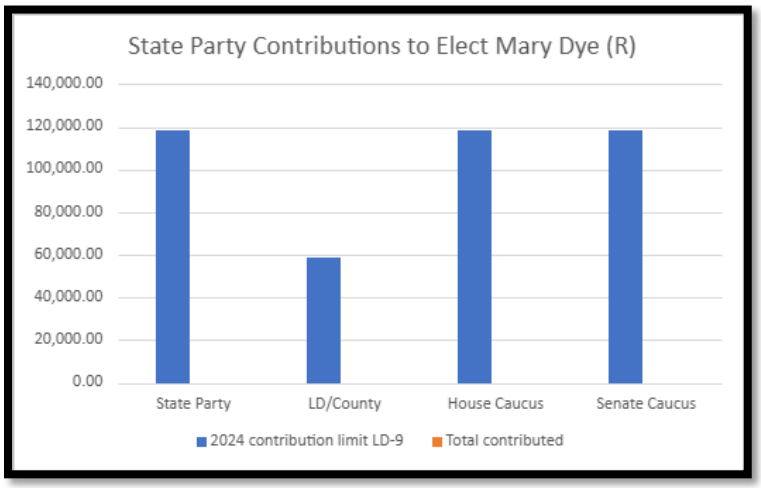


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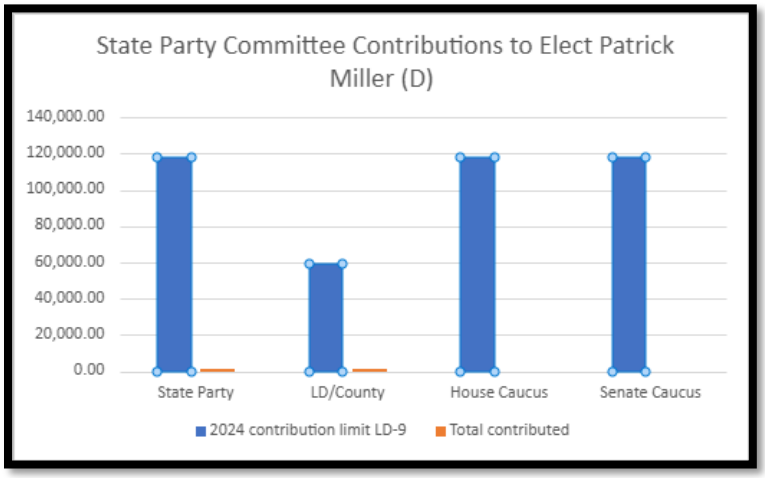


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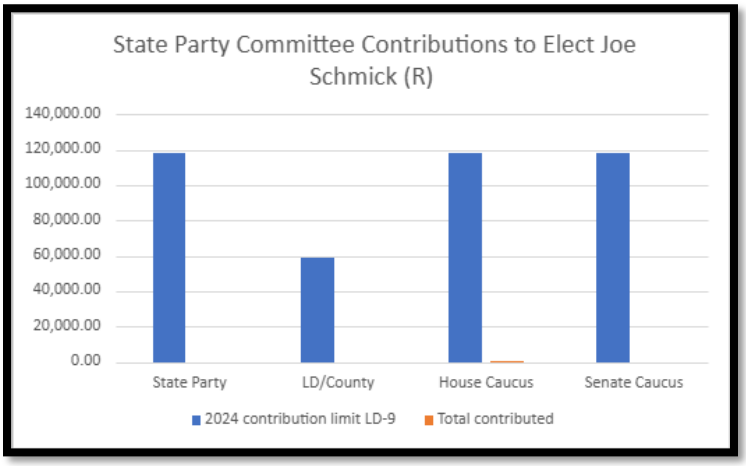


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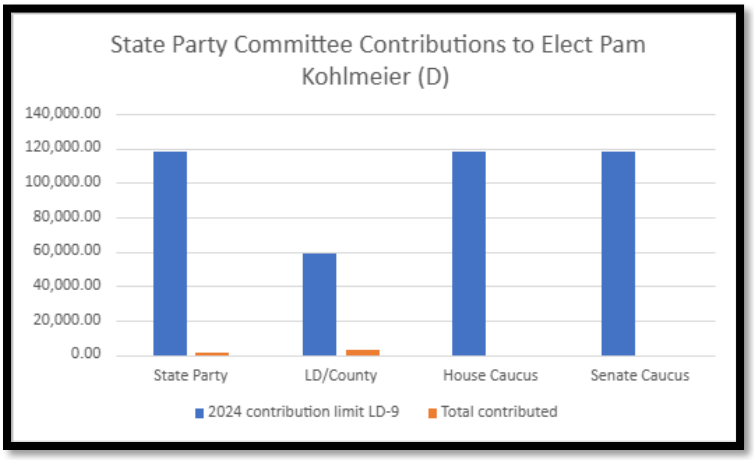


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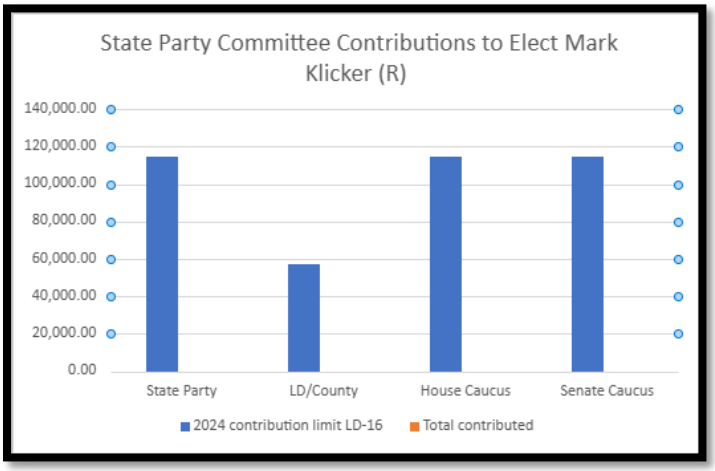


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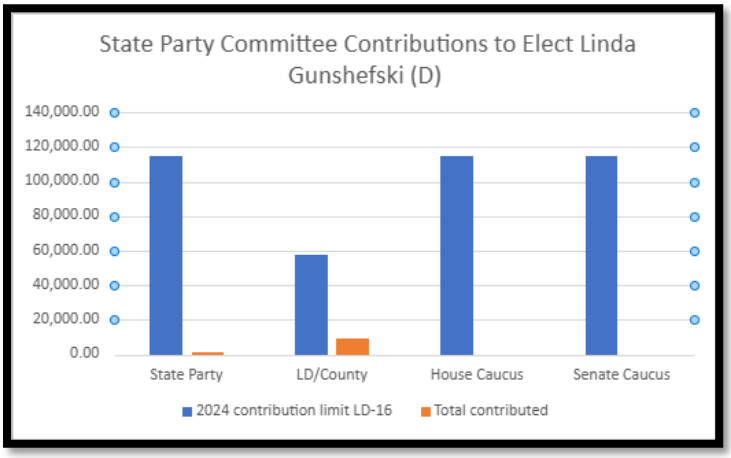


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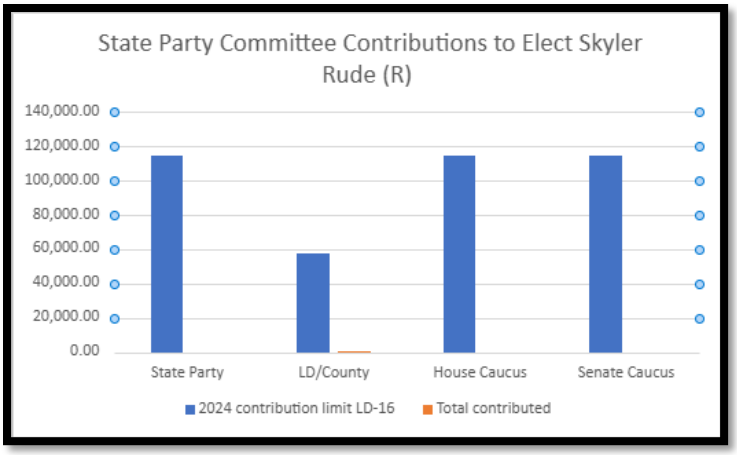


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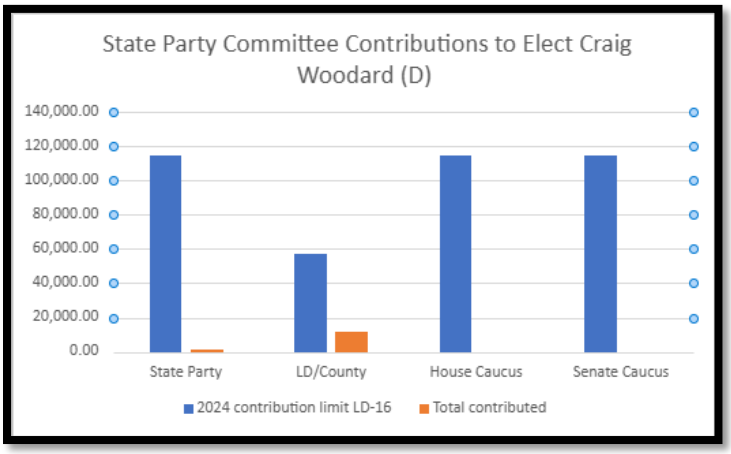


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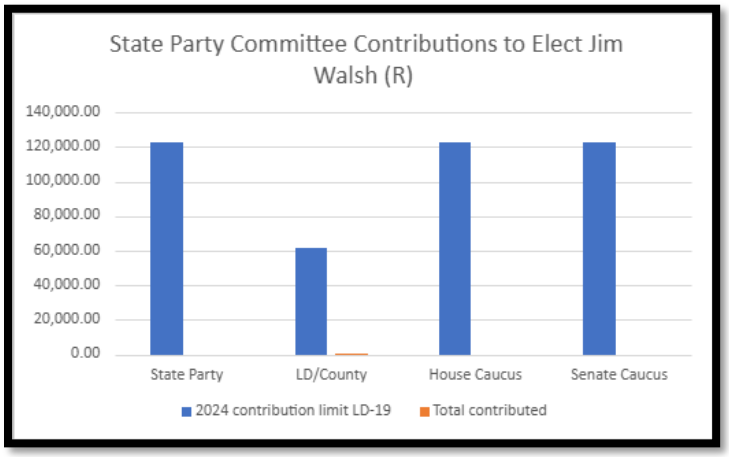


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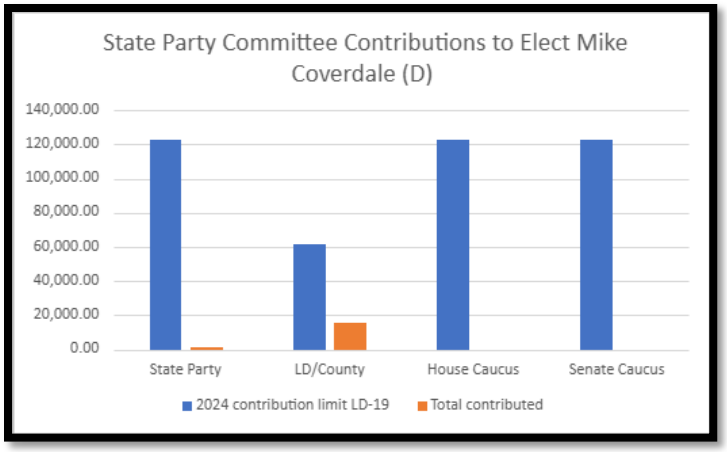


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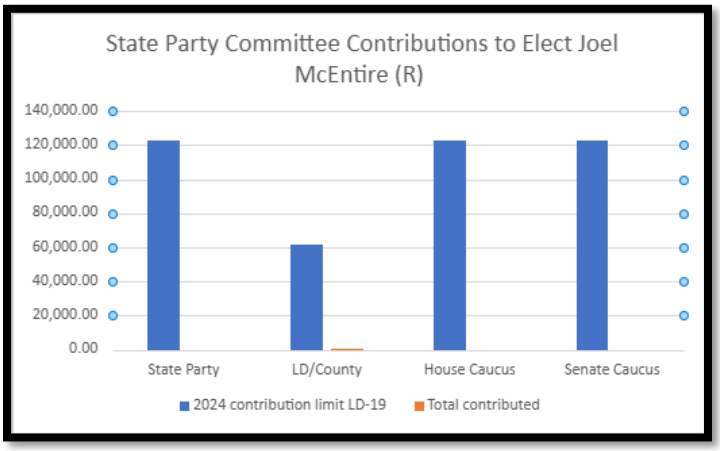


Figure 36

