25 August 2026

RE: Joe A. Kunzler Comments for PDC 27 August 2026 Meeting

Dearest PDC Commissioners and Staff;

Hi there Public Disclosure Commission (PDC), Joe A. Kunzler here. I have a long list of concerns this month so here's a table of contents:

Table of Contents

Lack of Transparency on Case Status Review Hearings 1
Fair Campaign Practices Code Complaint Publication 2
Legislative Planning Inadequate 2
  Need for Commission Discussion 2
  Need for "Contempt of the PDC" Law 2
    Who "Contempt of the PDC" Is Not & Is Aimed At 3
  In Conclusion, Redmond-Style 3
Issue With Steve Gordon vs. Commissioner Segal 4
Thoughts on the Rulemaking Memo 4
Concluding Thoughts 5

Lack of Transparency on Case Status Review Hearings

My top concern with the Public Disclosure Commission is the fact that case status review hearings have now become objects of mainstream media attention but the public cannot watch. Yes, this is about Case #192919.

I would prefer in the future if the Public Disclosure Commission would please share the MS Teams links to watch those case review hearings. Especially as respondents in case #192919 have made allegations of what was shared in the case status review hearings of #192919 and also arguably #189082. This is clearly a significant problem as much as the selective leaks of Public Disclosure Commission documents.

I expect the PDC to respond to these complaints around Project 42 and its capacity groups (e.g. Future 42, Citizens Action Defense Fund) as well as now against The Seattle Times with correctness, professionalism, and tenacity. To play and work to a high standard. These selective leaks damage trust in the PDC.

Fair Campaign Practices Code Complaint Publication

My comments are as follows: Publish the complaint on the website and make a press release it's published. Folks subscribe to the PDC's mailing lists. *There you go*.

Legislative Planning Inadequate

Sad to report I believe the current legislative planning is inadequate. Right now, the current proposal lacks to address the fact Avrum (Alex) Tsimerman and John P. Gibbons get cited by the PDC, don't respond to PDC outreach, don't attend PDC hearings and don't pay PDC fines. The PDC's request legislation for 2027 simply fails to address the repeat, contemptuous misbehavior.

Need for Commission Discussion

Furthermore, I did listen to the June 2026 PDC hearing and discussion about Case 191661. Commissioner Douglass North did suggest the following:

> "**One of the things that we should have a discussion about is whether in some of these larger cases**, rather than send them to our collection agency, and I don't know what the terms of our contract with the collection agency are, **we may want to just have the attorney general go after these folks. It would make a bigger splash and get more attention if we, you know, brought suit against these people.**"

Commission Chair J. Robert Leach said in response,

> "We have done that on a few occasions, but we've tried to only do that where we were pretty sure there were some assets because we don't want to throw good money after bad. **We've had a number of people with very large fines, but who are essentially judgment proof.**"

Need for "Contempt of the PDC" Law

As such, I am calling for a "Contempt of the PDC" law. I looked up the RCW for contempt of court in Chapter 7.21. In particular, I call your attention to (1):

> (1) "Contempt of court" means intentional:
>
> (a) Disorderly, contemptuous, or insolent behavior toward the judge while holding the court, tending to impair its authority, or to interrupt the due course of a trial or other judicial proceedings;
>
> (b) Disobedience of any lawful judgment, decree, order, or process of the court;
>
> (c) Refusal as a witness to appear, be sworn, or, without lawful authority, to answer a question; or
>
> (d) Refusal, without lawful authority, to produce a record, document, or other object.

We have had repeat respondents – like Gibbons and Tsimerman – disregard lawful judgments and orders of the PDC *repeatedly*. We have had both respondents refuse to appear before the PDC. We have had both respondents refuse "to produce a record, document, or other object" to the PDC in the campaign finance transparency forms. It's time to start asking for the power to place in the criminal justice system repeat respondents who refuse to participate in good faith with the PDC – aka ACT IN CONTEMPT.

Who "Contempt of the PDC" Is Not & Is Aimed At

I want to state at the outset – especially in these controversial times for the PDC – that my proposal is *not* aimed at those who are actively engaging with the PDC themselves or thru legal counsel as respondents should. *Rather*, this weapons system is aimed right at Respondent Avrum (Alex) Tsimerman to ensure that never again *means* never again. If we need to arrest and imprison Respondent Gibbons also, this would be solely Respondent Gibbons' fault for not working with the PDC to resolve his noncompliance with PDC orders.

In other words, this is my version of the "big stick". This is the AIM-174B "GUNSLINGER" of missiles – we don't talk about GUNSLINGER much; GUNSLINGER's based on other weapons systems, but GUNSLINGER *can* reach out and touch a horrendous big, bad guy. You use GUNSLINGER when getting in close with AIM-120 AMRAAMs isn't a realistic option. The PDC has attempted to get in close with Respondents Gibbons & Tsimerman, and sometimes that just has not worked to swat down the bully.

We also need to amend RCW 29A.08.515 to be clear that any insanity defense under this new RCW means you also lose your right to vote – and your right to stand for election. The Washington State Constitution is clear in Article VI, Section 3, "All persons convicted of infamous crime unless restored to their civil rights and all persons while they are judicially declared mentally incompetent are excluded from the elective franchise." Yes, I'm calling on the PDC to *get tough*. *Be brave*. *Seize and meet the moment*.

In Conclusion, Redmond-Style

Thanks to Respondent Tsimerman and his use of the insanity defense in King County District Court, we're going to have to ask the Legislature to be bold. But the goal is to strip those who repeatedly show broad contempt for the PDC of the ability to run for office. I cannot do this via rulemaking processes, so this will have to be a Commission Discussion.

Issue With Steve Gordon vs. Commissioner Segal

I'm bringing this festering feud that Mr. Steve Gordon seems to have with the PDC to the attention of the Commission, PDC staff and the public for several reasons. For one, I ask Commissioner Segal to please recuse himself from cases involving Project 42 and its "capacity groups" as well as Let's Go Washington. Here's a recent Steve Gordon post on X:

> "How can anyone expect fairness on anything before the PDC when Matt Segal is a commisioner. Gov Ferguson's campaign lawyer and founder of Pacifica Law, the firm working on behalf of the SEIU and the No on 645 camapign."

Gordon also arguably *irresponsibly* posted on X a while back the reckless allegation that, "A full inbox of kneecapping efforts from [Governor] Bob [Ferguson] & his PDC backup band". These kind of comments should be condemned – especially as the PDC has warned Governor Ferguson at my prompt to stop abusing his official social media. However, now that Commissioner Segal has been made aware of these comments, Commissioner Segal should please promise the public not to participate in PDC regulatory work around this year's initiatives – all three of which have Steve Gordon's documented financial involvement – to lower the temperature please.

Thoughts on the Rulemaking Memo

With that, let's save the best for last. Namely, my thoughts on the rulemaking memo.

I submit respectfully that "flexibility" is not a good idea. We've seen the initiative campaigns play stupid games around sponsor ID this election cycle – and many state legislative campaigns fail to comply. We could for example require that since these social media platforms mostly require a header banner, that the header banner on these social media platforms have the sponsor ID *clearly* visible at the get-go.

I also *somewhat* happen to agree with Sean Flynn that an alternative could be the PDC working,

> "To consider whether there is a need for updating the current rules (or guidance) regarding sponsor identification generally to address the newer technology and methods campaigns use to advertise online, including but not limited to social media. The petition highlights the fact that sponsor identification on social media and other forms of online advertising is a relatively common issue that PDC staff address in customer service and compliance"

However, I feel I need to show just how common this issue is. If we cannot get into a rulemaking process to provide some clarity, then we need to reluctantly pick a September day to rain complaints on noncompliant state legislative & initiative campaigns. Rather not do this.

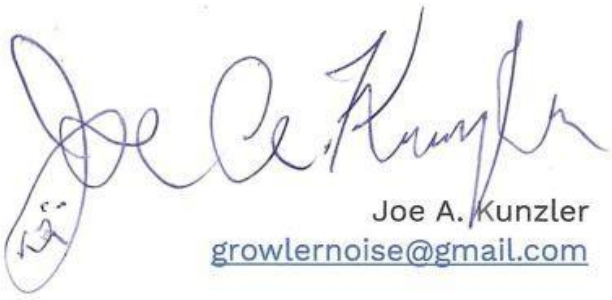
Concluding Thoughts

At some point, I should wrap up. As always, I like to conclude with a quotation. This time from Kaja Kallas the great #NAFO advocate for Ukraine,

> Democracies run on disagreements.
>
> As George Orwell wrote, "if liberty means anything at all, it means the right to tell people what they do not want to hear."
>
> In a democracy, we base our disagreements on facts.
>
> But we're right back in an age of untruth. Fact checking has fallen out of fashion.
>
> We form opinions and debate based on data. Policymakers take decisions based on data. Fact-checkers provide data.
>
> Wherever there is massive public communication—including social media—we need fact checkers.
>
> Otherwise, we only leave the door wide open to exploitation.

Ergo, I submit we need the PDC to provide that critical data and fact-checking. Sometimes that requires a little *enforcement*. We need to defend with vigor and sometimes sacrifice our democratic institutions, especially in the Trump Era and with attacks on the PDC growing from moneyed interests.

Very respectfully submitted;



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