



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

September 23, 2026

Delivered electronically to Dan Brady, representative of Let's Go Washington (Sponsored by Brian Heywood), at dan@danbradylaw.com

Subject: PDC Case 192919 regarding Let's Go Washington (Sponsored by Brian Heywood)

Dan Brady:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Pam Stuart on behalf of Washingtonians for Ethical Government on May 12, 2026. The complaint alleged violations of RCW 29B.25.090 and RCW 29B.25.100 for failure to timely and accurately report expenditures.

Applicable Laws and Rules

Per [RCW 29B.25.090](#) and [RCW 29B.25.100](#), a committee that selects the Full Reporting option on their registration report is required to report contributions and expenditures to the PDC on Cash Receipts Monetary Contributions reports (C-3 reports) and Campaign Summary Receipts & Expenditures reports (C-4 reports) pursuant to RCW 29B.25.090 and .100. The due dates for these reports are based upon the election cycle, the committee's election participation, and their financial activity.

Expenditures disclosed on C-4 reports, which must include, but are not limited to: 1) the name and address of each person to whom an expenditure was made during the period covered by the report; 2) the amount, date, and purpose of each expenditure; and 3) the total sum of all expenditures.

In-kind contributions are also reported on C-4 reports. Under WAC 390-16-207, such a contribution occurs when "a person provides goods, services or anything of value, other than money or its equivalent, to a candidate or political committee free-of-charge or for less than fair market value."

Background and Findings

- The Committee's most recent C-1pc, filed May 12, 2026, identified Jason Michaud as Treasurer and Brian Heywood as Chair. It disclosed LGW's support of I-2066, IL26-001, IL26-638 and IL26-645.
- The complaint alleged that LGW had received potential support of its measures from services provided by Brandi Kruse and had failed to report payments to Ms. Kruse or in-kind contributions received for the value of her services. The complaint explicitly noted Ms. Kruse's

speaking at a LGW rally in February 2026 and her participation in a LGW event in October 2025 and placed a monetary value on Kruse's support of LGW more broadly.

- In the initial response dated July 23, 2026, Dan Brady, representing LGW, said that the committee did not pay Ms. Kruse for any services of any kind. He further stated that Ms. Kruse "has never informed LGW that her time supporting LGW on her show or at any events had any value or that she expected future compensation of any kind" and that "LGW has no reason to believe that Ms. Kruse's public support for LGW ballot measures was anything other than news reporting and/or media editorializing."
- On August 31, 2026, PDC staff asked LGW who invited Ms. Kruse and the other featured speakers to the February 2026 rally and if LGW entered into a contract or agreement with any of them for payment.
- In his response, Mr. Brady confirmed that LGW invited Ms. Kruse and other advertised speakers to the February 2026 rally but did not make expenditures for or receive in-kind contributions for any of the speakers including Ms. Kruse, specifically stating that LGW is not aware of any person who paid Ms. Kruse to support LGW thereby creating an in-kind contribution by that person for her services to LGW. He also stated LGW had not entered into a contract to provide payment for Ms. Kruse's speakership at the rally.
- During the investigation, PDC staff found other instances of payment by other political committees to Brandi Kruse for speaking services. Staff found these were limited to county party fundraising events. When asked about these payments, Mr. Brady compared the facts in this case to PDC Case #154756 where counsel for Ms. Kruse stated that Kruse "only charges for keynote speeches and major events that require her to engage in significant advance planning."
- Staff found no evidence in PDC records or in the complaint that Ms. Kruse has been paid for being a speaker at a rally.
- Finally, the complaint alleged Brandi Kruse's promotion of LGW and its initiatives was native advertising for which Kruse is normally paid. Mr. Brady told PDC staff that LGW exercised no editorial control over Kruse's content and LGW is unaware of any person paying Kruse to support LGW thereby creating an in-kind contribution by that person of her services to LGW.
- In a letter to PDC staff, Ms. Kruse's counsel, Ashley Burman, stated: "No one, including Let's Go Washington, controls what she says, what topics she covers, or what positions she takes. Moreover, Ms. Kruse owns her business, Undivided Media LLC, and it is not controlled by any political party, committee, or candidate, including Let's Go Washington."
- Ms. Burman asserted that Ms. Kruse's statements on air, at LGW events and at the rallies are exempted from the statutory definition of political contribution, which excludes "a news item, feature, commentary, or editorial in a regularly scheduled news medium that is of interest to the public, that is in a news medium controlled by a person whose business is that news medium, and that is not controlled by a candidate or a political or incidental committee." RCW

29B.10.160

Summary and Resolution

PDC staff did not find any evidence that Let's Go Washington purchased Ms. Kruse's services in support of its initiatives. Furthermore, staff were unable to establish Ms. Kruse's promotion of Let's Go Washington initiatives and her participation in the organization's events were in-kind contributions. It appears that Ms. Kruse does charge for some speaking appearances but not all. In most cases, the PDC

would consider professional services for which the person normally charges an in-kind contribution when they are provided without compensation. But that determination is complicated here by the type of professional service at issue: speech itself. The evidence in this case does not establish that Ms. Kruse is typically paid for these specific types of speaking engagements, nor does PDC staff conclude that a public figure who at times sells their services for political activities necessarily converts all personal appearances, speeches, or statements on political matters to reportable in-kind contributions.

Under WAC 390-37-070, the executive director, at any time prior to consideration by the Commission, may dismiss a complaint which on its face, or as shown by investigation, shows that formal enforcement action is not warranted.

Based on this, the PDC has dismissed this matter in accordance with RCW 29B.60.020 and WAC 390-37-060(1)(d). However, this is a close case and PDC staff is reminding you about the importance of ensuring that any professional services provided to LGW and either paid directly by LGW or paid or donated by another person (including the individual providing the services) to benefit LGW are reported as an expenditure or an in-kind contribution.

If you have questions, contact Jennifer Hansen at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Electronically signed by Jennifer Hansen
Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed by Kim Bradford
Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: Pam Stuart