Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

INSTITUTE FOR FREE SPEECH, a Virginia non-profit corporation,

Plaintiff,

v.

FRED JARRETT, in his official and personal capacities as Chair of the Washington Public Disclosure Commission; NANCY ISSERLIS, in her official capacity as Vice-Chair of the Washington Public Disclosure Commission; WILLIAM DOWNING, in his official and personal capacities as a member of the Washington Public Disclosure Commission; RUSSELL LEHMAN, in his personal capacity as a former member of the Washington Public Disclosure Commission; PETER LAVALLEE, in his official capacity as Executive Director of the Washington Public Disclosure Commission; and ROBERT FERGUSON, in his official capacity as Washington's Attorney General,

Defendants.

NO. 3:21-cv-05546-BJR

DEFENDANTS' JOINT REPLY IN SUPPORT OF CROSS-MOTION FOR SUMMARY JUDGMENT

NOTE ON MOTION CALENDAR: OCTOBER 15, 2021

ATTORNEY GENERAL OF WASHINGTON
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

I. INTRODUCTION

"This is a case in search of a controversy." *Thomas v. Anchorage Equal Rights Comm'n*, 220 F.3d 1134, 1137 (9th Cir. 2000). IFS seeks to represent Mr. Eyman in his state-court appeal without any obligation to register, report, or disclose to the PDC. The PDC has made unequivocally clear that IFS may do so. *E.g.*, Dkt. 29 at 2 ("IFS may provide pro bono representation to Tim Eyman in his Washington state court appeal without registering or filing reports with, or disclosing its donors to, the [PDC] . . . . IFS may represent [Mr. Eyman] in that appeal without triggering any FCPA reporting obligations."). IFS attempts to invent a controversy where none exists. It engages in hyperbole and ad hominem attacks, even impugning the sincerity a respected former judge. Dkt. 34 at 31. This is not the sort of "controversy" required by Article III. This Court should not be deceived; IFS lacks Article III standing.

There is also a fundamental disconnect in IFS's position, both before the PDC and in its briefing to this Court. IFS repeatedly emphasizes that it seeks only to represent Mr. Eyman in a specific state-court appeal. *E.g.*, Dkt. 6-1 at 1-2; Dkt. 34 at 7:3-7. The PDC has made abundantly clear that IFS may do so without making FCPA disclosures. Dkt. 29 at 2, 6, 8. IFS also airs a generalized grievance about representation in a "defense posture" that extends far beyond its proposed representation of Mr. Eyman or any concrete plan IFS has. *E.g.*, Dkt. 34 at 1. IFS never acknowledges the fundamental disconnect between its assertions. The PDC's declaratory order appropriately limited itself to approving IFS's proposed representation of Mr. Eyman.

For the reasons set forth in Defendants' Cross-Motion for Summary Judgment, Dkt. 29, this Court should grant summary judgment in favor of Defendants.[1]

II. ARGUMENT

A. There is No Article III Case or Controversy

There is no credible argument that the FCPA will be applied against IFS based on its proposed representation of Mr. Eyman. Defendants have stated this unequivocally, over and over

[1] Former commissioner Lehman joins this brief as to Sections II(A) and II(B).

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1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

and over. Dkt. 6-8 at 9 ("*Pro bono* legal services provided to Mr. Eyman individually or to his bankruptcy estate, for the limited purpose of pursuing an appeal of the [superior] court order entered against Mr. Eyman . . . does not require IFS to register or report the identity of its donors, the value of its services, its cost of providing services, or any other information to the PDC under the FCPA for those legal services."); Dkt. 29 at 6 ("IFS may represent Mr. Eyman in his appeal without registering, filing reports, or disclosing its donors to the PDC."); *id.* ("The PDC's declaratory order is binding, Wash. Rev. Code § 34.05.240(8), and establishes that IFS's proposed representation of Mr. Eyman would not require it to comply with the FCPA's registration and disclosure requirements."); *id*. at 12 ("IFS may provide such representation without being subject to registration or disclosure requirements under the FCPA."); *id*. 14 ("The declaratory order . . . clarified that IFS's proposed representation of Mr. Eyman, in his individual capacity, would not result in any registration or disclosure requirements under the FCPA."); *id*. at 15 ("[T]he Declaratory Order actually *confirmed* IFS's position that *pro bono* representation Mr. Eyman's state court appeal would *not* trigger registration, reporting, or disclosure obligations by IFS under the FCPA."); *id*. at 16 ("The declaratory order expressly vindicated IFS's ability to represent Mr. Eyman in his appeal without registering, making reports, and disclosing its donors.").[2] IFS refuses to take "yes" for an answer. Its position that it has not been "provided a straightforward answer," Dkt. 34 at 7:7-8, is bewildering.

IFS's attempts to invent equivocation all lack merit. In contending that it might be subject to the FCPA, IFS relies heavily on the state-court order in the campaign finance enforcement action against Mr. Eyman. Dkt. 34 at 7, 17-19. But the state-court order does not address IFS's responsibilities under the FCPA. It could not; as IFS notes, it was not a party to the litigation and is not bound by the superior court's order. *Id*. at 18. The state-court order addresses only the responsibilities of Mr. Eyman. Dkt. 6-2 at 31-33. Whether or not the state-court order would require that Mr. Eyman disclose the value of *pro bono* legal services from IFS, it does not purport

[2] Even if the declaratory order had been equivocal—and it was not—judicial estoppel would preclude application of the FCPA against IFS for its proposed representation of Mr. Eyman. *See Anfinson v. FedEx Ground Package Sys., Inc.*, 174 Wash. 2d 851, 861-62, 281 P.3d 289 (2012) (identifying judicial estoppel factors).

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1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

to require IFS to register, file reports, or disclose its donors. *See* Dkt. 6-2. IFS's responsibilities are governed by the FCPA, and the PDC's declaratory order establishes that IFS's proposed representation of Mr. Eyman would not result in any registration, reporting, or disclosure requirements for IFS. Dkt. 6-8 at 9.

IFS's reliance on the FCPA's definition of "contribution" and "expenditure," Dkt. 34 at 13-14, 21, is misleading. Making a "contribution" or "expenditure" does not create an obligation to register, report, or disclose under the FCPA. IFS would be required to register, report, and disclose only if it is a "political committee" or "incidental political committee." Wash. Rev. Code §§ 42.17A.205(1), .207(1)(a). IFS is not a political committee in these circumstances because it has no expectation of "making expenditures in support of, or opposition to, any candidate or any ballot proposition." Wash. Rev. Code § 42.17A.005(41). IFS is not an incidental committee because its provision of legal services to Mr. Eyman is not "through a political committee." Wash. Rev. Code § 42.17A.005(28). As Defendants have already made clear, "IFS's proposed representation of Mr. Eyman in his appeal would necessarily be representation of Mr. Eyman in his individual capacity," not in his capacity as a continuing political committee. Dkt. 29 at 8. That is true regardless of the result of the state-court appeal. This also illustrates why IFS's reliance on WAC 390-17-405(2) is inapplicable to IFS's proposed representation of Mr. Eyman. The relevant part at the end of that regulation applies only to services provided "to a political committee." Wash. Admin. Code § 390-17-405(2). But again, IFS's representation of Mr. Eyman in this appeal would be exclusively in his individual capacity, not a political committee capacity.

IFS's argument about an "inherent threat of enforcement" relies upon its misrepresentation of the FCPA. IFS's argument relies on "the FCPA's definitions of 'contributions' and 'expenditures.'" Dkt. 34 at 13:15. But, as explained, these definitions do not define the circumstances in which a provider of legal services must register, file reports, and make disclosures. That is governed by Wash. Rev. Code §§ 42.17A.205(1), .207(1)(a). IFS does not address the applicable statutes. In each of the cases relied upon by IFS, there was a statute or

ATTORNEY GENERAL OF WASHINGTON
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

court rule that expressly prohibited the conduct in which the plaintiff sought to engage. *Human Life of Wash., Inc. v. Brumsickle*, 624 F.3d 990, 1001 (9th Cir. 2010) (statute required disclosure by organizations with a primary purpose of supporting or opposing candidates or ballot propositions); *Wolfson v. Brammer*, 616 F.3d 1045, 1059 (9th Cir. 2010) (court rule prohibited judicial candidates from soliciting contribution or endorsing others); *Cal. Pro-Life Council, Inc.*, 328 F.3d 1088, 1092 (9th Cir. 2003) (statute required disclosure of expenditures advocating passage or defeat of a ballot measure); *Majors v. Abell*, 317 F.3d 719, 721 (7th Cir. 2003) (statute criminalized certain political advertising). Not so here, where the plain language and PDC's interpretation make clear that IFS would not be required to register, file reports, or make disclosures.

IFS's references to comments made by PDC staff and counsel, Dkt. 34 at 15-16, are a red herring. After those statements (by non-defendants), the PDC commissioners adopted a declaratory order approving IFS's proposed representation of Mr. Eyman without any registration, reporting, or disclosure requirement. Dkt. 6-8 at 9.

IFS remains dissatisfied that the PDC declined "to issue a binding Declaratory Order absolving IFS from any and all future FCPA registration or reporting requirements in relation to representing Mr. Eyman in his role as a continuing political committee." Dkt. 34 at 2 (quoting Dkt. 6-8 at 9). This language identifies the limits of the declaratory order. The declaratory order is limited to IFS's proposed representation of Mr. Eyman on his appeal in state court (which is exclusively representation of Mr. Eyman in his individual capacity); the declaratory order would not apply to representation of Mr. Eyman in a separate proceeding. IFS objects that is "has no interest in providing such services." Dkt. 34 at 21:13-14. And IFS thereby concedes that there is no controversy here. The declaratory order authorizes IFS to engage in a particular representation of Mr. Eyman without registration, reporting, or disclosure, and IFS has no intent to provide any other type of representation to Mr. Eyman. There is no adversity as to IFS's representation of Mr. Eyman.

IFS's reliance on previous PDC investigations also misses the mark. IFS points to three matters, but none remotely resemble the circumstances of IFS's proposed representation. None of

ATTORNEY GENERAL OF WASHINGTON
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

the three matters cited by IFS involved an allegation that the provider of *pro bono* legal services must register, report, or disclose under the FCPA. Instead, each involved an allegation that the committee *receiving* the in-kind contribution was required to disclose it.[3] IFS's complaint focuses on *its* obligation "to register and report." Dkt. 1 at 8:21-22; *see also id*. at 16:4-8 (requesting injunction against enforcement of FCPA "against IFS[]"); *cf.* Dkt. 6-1 at 1-2 (asking, in petition for declaratory order, whether FCPA would "require IFS" to file reports or make disclosures).[4] In addition, one matter (Respect Washington) did not involve *pro bono* legal services. Two matters (Respect Washington and One Washington Equality Coalition) were not enforcement actions at all; the PDC closed both cases with a warning. The third matter (Recall Dale Washam) involved *pro bono* legal assistance in a markedly different context, and the PDC is already enjoined from requiring disclosure of free legal services in that context. Dkt. 6-3 at 4:14-18. None of these cases support a credible threat of enforcement with respect to IFS's proposed representation of Mr. Eyman.

Finally, IFS's belated and conclusory assertion of an intent to "represent other similarly situated parties in the future," Dkt. 34 at 20, does not establish standing. There are two obvious problems. First, IFS concedes that the circumstances of Mr. Eyman's case are unique, Dkt. 34 at 29:24; there are no similarly situated persons. Second, IFS concedes that standing requires a "concrete plan," *Id*. at 12:17. IFS identifies no such concrete plan; it offers only qualified statements of possible future representation of others. Dkt. 36 at 2:16-17 ("*If* they were bankrupt, or had fewer resources, we *might* want to represent them" (emphasis added).); *see also id*. at 2:8-11 ("We do want to represent other parties in Washington State . . . *if* those cases fit with our mission . . . " (emphasis added).). IFS fails to meet the requirement that it "specify when, to whom, where, or

[3] This is material. A recipient's disclosure reveals information disclosed by a notice of appearance (i.e., name, address, and description) and the fair market value of the services. Wash. Rev. Code § 42.17A.240(2). IFS has not alleged that disclosure of the value of its services is a harm.

[4] There would be no case or controversy related to reporting by Mr. Eyman either. Mr. Eyman must report "in compliance with the FCPA." Dkt. 6-2 at 31:17-18. The FCPA does not apply to in-kind legal services in Mr. Eyman's state-court appeal from the current enforcement action, as Defendants have repeatedly made clear.

under what circumstances." *Thomas*, 220 F.3d at 1139. This is not a "concrete plan"; it amounts to only "hypothetical intent" and " 'some day' intentions." *Id*. at 1139-40.

In sum, there is no Article III case or controversy here. IFS seeks to represent Mr. Eyman in his state-court appeal without any requirement to register, report, or disclose to the PDC. Defendants have made unequivocally clear that it may do so. All that remains is IFS's desire for an advisory opinion about hypothetical situations. This Court should dismiss for lack of Article III jurisdiction and need not consider any of the remaining issues.

B. IFS's Personal Capacity Claims Lack Merit

IFS's personal capacity claims against Commissioners Downing and Jarrett and former commissioner Lehman have no legal basis. IFS does not allege that these individuals adopted the statutes that IFS alleges are unconstitutional. Nor does IFS allege that these individuals enforced the challenged statutes against IFS. Instead, IFS's theory is that, in failing to narrow a law adopted by the Legislature (or, as IFS puts it, "failing to clarify the scope" of the FCPA, Dkt. 34 at 25), the members of the PDC independently violated IFS's constitutional rights. Nonsense. IFS provides absolutely no authority for proposition that "failing to clarify," Dkt. 34 at 25, the law is a constitutional violation. Such a proposition would senselessly create personal liability for dedicated public servants for faithfully carrying out a state's laws. If those laws are unconstitutional, on their face or as applied, a plaintiff may well be entitled to prospective injunctive relief, but not to monetary relief against the public servants in their personal capacities. In addition to the obvious inequity of penalizing the faithful performance of public duties, IFS's position would also create a disincentive for the PDC and other governmental agencies to issue advisory opinions, even those, like the PDC's advisory opinion here, that vindicate constitutional rights.

In addition, the personal-capacity claims are barred by both quasi-judicial immunity and qualified immunity. IFS's quasi-judicial immunity argument substantially misses the mark. IFS argues that "[t]he absence of an adversarial process is outcome determinative here." Dkt. 34 at

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1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

25. This argument completely ignores the Ninth Circuit's binding precedent in *Miller v. Davis*, 521 F.3d 1142 (9th Cir. 2008). In *Miller*, the Ninth Circuit applied quasi-judicial immunity to a governor's review of parole board decisions, an act that was not an adversarial process. *Miller*, 521 F.3d at 1145. IFS has no answer to *Miller*. IFS's reliance on the *Zamsky v. Hansell*, 933 F.2d 677 (9th Cir. 1991), is no answer. *Zamsky* involved an action that little-resembles a declaratory judgment; the county commission had required that a property be re-zoned. *Id*. at 678. Here, by contrast, the PDC's declaratory order did not require that IFS do anything. The declaratory order, like a declaratory judgment, simply applied the law to a concrete set of facts. And the fact that the PDC issues few declaratory orders, Dkt. 34 at 28:8-9, is also no answer. IFS's position is that a failure to "clarify the scope" of the FCPA is a constitutional violation, Dkt. 34 at 25, so even denying a petition would apparently create potential liability for commissioners.

Qualified immunity also precludes IFS's personal-capacity claims. For qualified immunity purposes, "the clearly established right must be defined with specificity" and not " 'at a high level of generality.' " *City of Escondido v. Emmons*, 139 S. Ct. 500, 503 (2019) (per curiam) (quoting *Kisela v. Hughes*, 138 S. Ct. 1148, 1152 (2018)). IFS mischaracterizes the right at issue as a right "of non-profit legal service providers to associate with parties for the purposes of public interest litigation against the government." Dkt. 34 at 30. But the PDC's declaratory order does not even arguably interfere with that right; IFS's position is that *state law* interferes with its associational rights, *Id*. at 13. Elsewhere in its brief, IFS more accurately characterizes the claimed right at issue in the personal-capacity claims as a right to have PDC commissioners "clarify the scope" of law that they administer. Dkt. 34 at 25. IFS provides no authority supporting the existence of such a right, nor are Defendants aware of any such authority.

In short, IFS's personal-capacity claims have no merit. Even if IFS had standing, Commissioner Downing and Jarrett and former commissioner Lehman are entitled to summary judgment on the personal-capacity claims.

ATTORNEY GENERAL OF WASHINGTON
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

C. IFS is Not Entitled to Injunctive Relief[5]

1. IFS brings both facial and as-applied challenges

When a "plaintiff['s] claim and the relief that would follow . . . reach beyond the particular circumstances of" the plaintiff, that plaintiff must satisfy the standard "for a facial challenge to the extent of that reach." *Doe v. Reed*, 561 U.S. 186, 194 (2010). That standard requires that a plaintiff establish that the challenged law "is unconstitutional in every conceivable application."[6] *Foti v. City of Menlo Park*, 146 F.3d 629, 635 (9th Cir. 1998) (quoting *Members of City Council v. Taxpayers for Vincent*, 466 U.S. 789, 796 (1984)).

IFS's challenge related to its proposed representation of Mr. Eyman would, if there were any adverse action to contest, be an as-applied challenge.

IFS would have to satisfy the standard for a facial challenge with respect to its challenge to application of the FCPA to "the provision of *pro bono* legal services provided in a defense posture in an enforcement action." Dkt. 1 at 16:12-13. This relief would "reach beyond the particular circumstances of" IFS's proposed representation of Mr. Eyman. *Doe*, 561 U.S. at 194.

2. IFS's exacting scrutiny argument lacks merit

IFS seeks to compel Defendants to defend application to the FCPA to its proposed defense of Mr. Eyman. Dkt. 4 at 18-19; Dkt. 34 at 5. This makes little sense. Defendants have clearly disclaimed application of the FCPA in this context. *E.g.*, Dkt. 6-8 at 9; Dkt. 29 at 2.

Though this Court should decline IFS's invitation to address purely hypothetical applications of the FCPA, IFS's facial challenge lacks merit. A threshold problem with IFS's facial challenge is that IFS challenges the wrong statute. IFS challenges the definition of "contribution" in Wash. Rev. Code § 42.17A.005(15). *E.g.*, Dkt. 1 at 13 (¶52). But this definition does not require registration, reporting, or disclosure. IFS would be marginally closer to the mark

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[5] Any prospective injunctive relief against former commissioner Lehman in his personal capacity, *see* Dkt. 1 at 16 (¶¶B, C), is inappropriate. As he is no longer a commissioner, an injunction as to him is pointless.

[6] A different standard applies to overbreadth challenges, but IFS has not raised such a challenge. Nor could it in light of the FCPA's broad plainly legitimate sweep.

ATTORNEY GENERAL OF WASHINGTON
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

were it to challenge Wash. Rev. Code § 42.17A.205 or .207, which define the triggering events for registration, reporting, and disclosure in this context.[7] This distinction matters. Contrary to IFS's implication, not every in-kind contribution of legal services triggers FCPA requirements for the provider. There are other conditions precedent that narrow the scope of the requirements, thereby enhancing their fit. IFS's focus on the definition section ignores these limitations.

There are many conceivable applications in which the FCPA will satisfy exacting scrutiny in the context of *pro bono* legal services provided in a defense posture. For example, take extensive *pro bono* legal services provided in a defense posture to a political committee supporting a candidate for governor. The newly-elected governor later awards the law firm a lucrative contract. This illustrates how the FCPA's reporting and disclosure requirements serve the recognized interest in "deter[ring] actual corruption and avoid[ing] the appearance of corruption by exposing large contributions and expenditures to the light of publicity." *Yamada v. Snipes*, 786 F.3d 1182, 1197 (9th Cir. 2015) (quoting *Buckley v. Valeo*, 424 U.S. 1, 67 (1976) (per curiam)). For another example, take a political committee that strikes a deal with a nonprofit law firm under which a wealthy supporter (who would otherwise make a donation to the political committee to cover legal expenses) makes a donation directly to the law firm, which then provides "*pro bono*" legal services to the political committee.[8] This implicates not only the State's anti-corruption interest but also the public's informational interest in enabling "the electorate to make informed decisions and give proper weight to different speakers and messages." *Id.* (quoting *Citizens United v. Fed. Elec. Comm'n*, 558 U.S. 310, 371 (2010)). In both cases, FCPA requirements on the law firm (which must be a "political committee" or "incidental committee") are substantially related to an important governmental interest, with a

[7] Notably, the Washington Supreme Court has narrowed the definition of "political committee." Under the expenditure prong, an entity is a political committee only if it has a primary purpose of supporting or opposing a candidate or ballot measure. *State v. Grocery Mfrs. Ass'n*, 195 Wash. 2d 442, 461 P.3d 334 (2020).

[8] This would be in line with the type of graft by Mr. Eyman that led to the state-court order. Dkt. 6-2 at 7 (¶2.14), 14-15 (¶2.38), 17 (¶ 2.40). To be abundantly clear, Defendants do not in any way question the integrity of IFS; this argument is made in the context of IFS's facial challenge.

ATTORNEY GENERAL OF WASHINGTON
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

meaningful "means-end fit" (i.e., narrow tailoring). Because there are conceivable applications where the requirement can constitutionally be applied, IFS's facial challenge would fail.

3. IFS's vagueness challenge lacks merit

IFS does not make a facial vagueness challenge. Its vagueness challenge is only "[a]s-applied to Plaintiff IFS." Dkt. 1 at 14 (¶58); *see also id.* at 15 (¶62) (referring to enforcement "against IFS"). As a result, the inquiry is whether the FCPA's "terms are clear in their application to [IFS's] proposed conduct." *Holder v. Humanitarian L. Project*, 561 U.S. 1, 21 (2010). As discussed above, the FCPA is clear and does not apply to IFS's proposed representation of Mr. Eyman. *See supra* at p. 3. IFS's cross-response brief misreads Defendants' cross-motion. In the cross-motion, Defendants wrote as follows:

> But the *pro bono* defense of Tim Eyman in an individual regulatory action would not qualify as a contribution to a political committee. The statute is not vague, IFS just does not like what it says.

Dkt. 29 at 31:3-5 (underline added). From this, IFS somehow represents that Defendants "claim that the FCPA clearly covers IFS's proposed actions." Dkt. 34 at 21:21-23. Defendants' brief said the opposite. This Court should not be distracted by IFS's straw-man attack or its baseless insinuations as to Defendants' motives. *Id.* at 22:6-8. The FCPA is clear—IFS's proposed conduct would not require that it register, report, or disclose. IFS's vagueness challenge fails.

4. IFS's content-based argument lacks merit

The FCPA's definition of "contribution" is not a content-based restriction on speech. As discussed, the definition is not a restriction on speech at all. IFS fails to meaningfully engage with the actual operation of the FCPA, never even citing Wash. Rev. Code § 42.17A.205 or .207.

Further, "a statute that facially distinguishes a category of speech or speakers is content-neutral if justified by interests that are 'unrelated to the suppression of free expression.'" *DISH Network Corp. v. F.C.C.*, 653 F.3d 771, 778 (9th Cir. 2011) (quoting *City of Renton v. Playtime Theatres, Inc.*, 475 U.S. 41, 48 (1986)). The exclusion of certain categories from the definition

ATTORNEY GENERAL OF WASHINGTON
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

of "contribution" in Wash. Rev. Code § 42.17A.005(15)(b)(viii) is such a distinction. The justification for this distinction is that contributions provided to political parties, candidates, and caucus political committees are subject to contribution limits. Wash. Rev. Code § 42.17A.405(2), (7). Absent the legal-services exception from the definition of "contribution," lawyers would not be able to provide candidates with in-kind legal services valued in excess of $2,000. Wash. Rev. Code § 42.17A.405(2); Wash. Admin. Code § 390-05-400. Political committees, by contrast, face no such contribution limits. As a result of the exception, political committees, candidates, and political parties alike may all receive unlimited in-kind legal services.[9] Understood in context, exclusion of certain categories from the definition of "contribution" is designed to *enhance* free expression, not suppress it.[10] It does not make candidates, political parties, and caucus political committees "favored" entities; rather, it mitigates the additional burden of contribution limits that they face.

For this, and the other reasons addressed in Defendants' prior brief, the FCPA is not impermissibly content-based.

III. CONCLUSION

This Court should enter summary judgment in favor of Defendants and deny IFS's motion for summary judgment.

DATED this 15th day of October 2021.

ROBERT W. FERGUSON
Attorney General

s/ Tera M. Heintz
TERA M. HEINTZ, WSBA No. 54921
Tera.heintz@atg.wa.gov
s/ Karl D. Smith
KARL D. SMITH, WSBA No. 41988
Karl.smith@atg.wa.gov

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[9] For candidates, such legal services must be "for the purpose of ensuring compliance with state election or public disclosure laws." Wash. Rev. Code § 42.17A.005(15)(a)(viii)(B).

[10] And it would also satisfy strict scrutiny on this basis. The exception serves the compelling governmental interest of respecting the First Amendment rights of candidates and political parties and is the least restrictive means of avoiding a hard cap on *pro bono* legal services.

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Deputy Solicitors General
s/ Todd Sipe
TODD SIPE, WSBA No. 23203
Todd.Sipe@atg.wa.gov
s/ Christina L. Pfluger
CHRISTINA L. PFLUGER, WSBA No. 44231
Christina.Pfluger@atg.wa.gov
Assistant Attorneys General
PO Box 40100
Olympia, WA 98504-0100
360-753-6200

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CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, that I electronically filed a true and correct copy of the foregoing document with the Clerk of the Court of the United States District Court Western District Of Washington by using the appellate CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

DATED this 15th day of October 2021, at Olympia WA.

s/ Stacey McGahey
STACEY MCGAHEY
Legal Assistant

ATTORNEY GENERAL OF WASHINGTON
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200