



18 West Mercer Street, Suite 400
Seattle, WA 98119
TEL (800) 238.4231
FAX (206) 378.4132

Marina Multhaup
Senior Associate
DIR (206) 257-6001
multhaup@workerlaw.com

***Submitted via www.pdc.wa.gov
and via e-mail to pdc@pdc.wa.gov***

October 29, 2024

Peter Frey Lavallee
Executive Director
Washington Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908

Re: Formal Complaint – Lawrence Patrick Hughes, Let’s Go Washington, Dave Reichert,
Jaime Herrera Beutler
Our File No. 6694-001

Dear Executive Director Lavallee:

A situation has come to our attention involving possible violations of the Fair Campaign Practices Act (FCPA) by Lawrence Patrick Hughes, Let’s Go Washington (Sponsored by Brian Heywood)—(Let’s Go Washington), Gubernatorial candidate Dave Reichert, and State Lands Commissioner candidate Jaime Herrera Beutler.

Mary Ellen Hughes, the late wife of Lawrence Patrick Hughes, appears to have passed away in October of 2023. However, Let’s Go Washington, Dave Reichert, and Jaime Herrera Beutler have all reported contributions putatively made by Mary Ellen Hughes posthumously. While we do not know for sure, it appears that Lawrence Patrick Hughes violated RCW 42.17A.435 by unlawfully contributing money under the name of a deceased person and violated RCW 42.17A.405(2) by, through that means, making contributions in excess of the contribution limits.

In addition, if true, Let’s Go Washington has potentially violated RCW 42.17A.235 by failing to accurately record and report its true contributors and the amounts contributed. Lastly, if true, Dave Reichert and Jaime Herrera Beutler violated RCW 42.17A.235 and RCW 42.17A.405(14) by failing to accurately report their contributors and by accepting contributions which exceed the limits for individuals per election.

If confirmed, these violations constitute an attempt to undermine the fundamental principles of the Fair Campaign Practices Act and the transparency of elections in Washington State. The intent of this letter is to communicate to the PDC the extent of our concerns and the information we have, in order that the PDC may properly investigate this matter.

ALLEGED VIOLATIONS

A. **Mary Ellen Hughes, married to Lawrence Patrick Hughes, seemingly passed away in October of 2023.**

Lawrence Patrick Hughes married Mary Ellen Pigott on January 18, 1958.¹ It appears that Mr. Hughes goes familiarly by “Pat,” but his full name is Lawrence Patrick Hughes.² The Hughes are wealthy philanthropists who are known in Seattle and Washington state as large donors.³ According to an obituary published in The Seattle Times, Mary Ellen Hughes passed away on October 14, 2023, and was survived by her husband.⁴

B. **Lawrence Patrick Hughes seemingly contributed in his deceased wife’s name to Gubernatorial candidate Dave Reichert.**

On December 13, 2023, according to the C3 report filed with the PDC, both Lawrence Patrick Hughes and Mary Ellen Hughes each contributed \$2,400 to Dave Reichert, on the same day, from the same address.⁵ Then Mary Ellen seemingly made a subsequent \$2,400 donation to Dave Reichert on May 1, 2024.⁶ Assuming that Mrs. Hughes passed away on October 14, 2023, as stated in her obituary, it appears that Mr. Hughes likely donated a total of \$7,200 to Dave Reichert, concealing most of it under his wife’s name. Such donations would exceed the individual contribution limit of \$2,400 to a state executive candidate per election.

C. **Lawrence Patrick Hughes seemingly contributed in his deceased wife’s name to State Lands Commissioner candidate Jaime Herrera Beutler.**

On April 5, 2024, according to the C3 report filed with the PDC, both “Lawrence Hughes” and “Mary E. Hughes” each contributed \$2,400 to Jaime Herrera Beutler, on the same day, from the same address.⁷ Again, assuming that Mrs. Hughes passed away on October 14, 2023, it appears that Mr. Hughes in fact donated this total amount of \$4,800 to Herrera Beutler on April 5, 2024, concealing half of it under his deceased wife’s name. Prior to that, Mr. Hughes had donated \$1,000 to Herrera Beutler on February 29, 2024.⁸ All told, it appears that Mr. Hughes donated a total of \$5,800 to Herrera Beutler, which exceeds the individual contribution limit of \$2,400 to each candidate for executive office per election.

¹ <https://washingtondigitalnewspapers.org/?a=d&d=CATHNWP19580124.2.92&e=-----en-20--1--txt-txIN----->
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² *See Id.*

³ <https://www.washington.edu/news/2005/09/29/the-right-thing-to-do-uw-reaches-out-to-help-in-katrinas-aftermath/>: (“Lawrence Patrick Hughes (a member of the UW Foundation Board) and his wife, Mary Ellen, both 1957 graduates of the UW, responded to President Emmert’s appeal for help with a stunningly large donation of \$100,000.”)

⁴ <https://obituaries.seattletimes.com/obituary/mary-ellen-hughes-1088951616/>

⁵ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110223709>

⁶ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110220896>

⁷ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110210018>

⁸ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110204844>

D. Lawrence Patrick Hughes seemingly contributed in his deceased wife’s name to Let’s Go Washington.

On August 1, 2024, according to the C3 report filed with the PDC by Let’s Go Washington, both “Hughes Lawrence” and “Hughes Mary Ellen” each donated \$50,000, on the same day, from the same address.⁹ Lawrence Patrick Hughes subsequently contributed \$400,000 to Let’s Go Washington on August 6, 2024.¹⁰ And Mr. Hughes contributed \$50,000 to Let’s Go Washington on April 18, 2024. In total, it appears that Mr. Hughes has contributed \$550,000 to Let’s Go Washington in 2024.

ARGUMENT and AUTHORITY

A. Potential violations of the FCPA by Lawrence Patrick Hughes, Jaime Herrera Beutler, and Dave Reichert.

As explained by RCW 42.17A.435, “[n]o contribution shall be made and no expenditure shall be incurred, directly or indirectly, in a fictitious name, anonymously, or by one person through an agent, relative, or other person *in such a manner as to conceal the identity of the source of the contribution* or in any other manner so as to effect concealment.” (Emphasis added).

It appears that Lawrence Patrick Hughes made several contributions through the name of his deceased wife in such a manner that would conceal himself as the true source of the contributions. If true, such behavior would violate Washington state law and jeopardize the transparency of Washington’s elections.

Candidates and committees are required by law to accurately record and report the *actual sources* and amounts of contributions received, as well as the true recipients and amounts of expenditures. When Dave Reichert and Jaime Herrera Beutler recorded and reported contributions from a well-known and deceased wealthy philanthropist, Mary Ellen Hughes, they failed to report the actual source of the contributions from which they received, Lawrence Patrick Hughes, in violation of RCW 42.17A.235.

In addition, it appears that Lawrence Patrick Hughes exceeded the contribution limits through the donations he made in his name and his wife’s name to Dave Reichert and Jaime Herrera Beutler. No candidate for office may accept contributions which exceed the limits set forth in the FCPA, *see* RCW 42.17A.405(2). When Dave Reichert accepted a total of \$7,200 from seemingly one person, Lawrence Patrick Hughes, he may have violated the contribution limits set forth in RCW 42.17A.405(1)(b), which limit individual contributions to a candidate for state office other than legislative office to \$2,400 per election. In addition, when Jaime Herrera Beutler accepted a total of \$5,800 from seemingly a single individual, Lawrence Patrick Hughes, Herrera Beutler may similarly have violated RCW 42.17A.405(14).

B. Potential violation of the FCPA by Let’s Go Washington.

Let’s Go Washington seemingly violated RCW 42.17A.235 when it recorded an August 1, 2024, \$50,000 contribution as having been made by Mary Ellen Hughes, when Mrs. Hughes had passed away months before. Because Mr. Hughes was a well-known and frequent contributor to Let’s Go Washington,

⁹ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110236393>

¹⁰ <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110238086>

it is likely that Let's Go Washington knew or should have known that the contribution that was seemingly made by Mary Ellen Hughes was actually from Lawrence Patrick Hughes. Such concealment or misrepresentation violates the rigorous campaign finance reporting obligations under RCW 42.17A.

CONCLUSION

We request that the PDC investigate this matter and take all appropriate follow-up actions necessary to ensure that the FCPA is upheld. If true, such violations threaten to violate the backbone of the contribution and reporting obligations, which are fundamental to the FCPA and necessary to ensure free and fair elections in Washington State.

Please contact me with any questions or concerns at (206) 257-6003.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Multhaup', written in a cursive style.

Dmitri Iglitzin
Marina Multhaup
Counsel for Washingtonians for Ethical Government