

Hello:

I am writing in response to the agency's public invitation to comment on the emergency rules for the implementation of HB 2032.

I testified in favor of HB 2032: I believe that yard signs should include sponsor ID. I am glad that the Legislature imposed this new requirement.

However, I am skeptical that the agency staff will actually enforce this new requirement. Typically, when a candidate or political committee fails to include sponsor ID on a piece of political advertisement, the agency will simply dismiss the complaint with a warning letter. (See attached list of cases where violation of RCW 42.17A.320 has been alleged where staff have dismissed the complaint with a warning letter.)

While it is obviously far more expedient for agency staff to dismiss these types of cases with warning letters (as opposed to actually seeking penalties), these dismissals send a message to the regulated community that including sponsor ID is effectively optional and that there are no meaningful penalties for noncompliance.

Over the 2024 election cycle, I predict that the agency will be receiving a large number of complaints relating to yard signs that have failed to include the legally required sponsor ID. My prediction is that not a single one of these cases will result in an actual penalty being imposed and that they will all be dismissed with warning letters. I will be happy to admit it if I wind up being wrong.

Please consider these questions:

What sort of message does the PDC send to the regulated community when it perpetually dismisses certain types of violations with warning letters?

Doesn't the PDC have an obligation to enforce requirements that have been duly adopted by the Legislature or by the voters through the initiative process?

Best,

Conner Edwards
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case	complainant	respondent	subject	areas_of_law	status	url
148416	Richard Fullen	Citizens for Schools Walla Walla	Citizens for Schools Walla Walla: Alleged violation of RCW 42.17A.320 for failure to provide sponsor identification on political advertising. (EY'24, FEB'24)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/148416
146826	Susan Boundy-Sanders	Alex Campbell	Campbell Alex: Alleged violation of RCW 42.17A.320 for failure to provide complete sponsor identification on political advertising (EY'23, NOV'23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/146826
146686	Nancy Moffatt, Brandon Wieschhaus, Meredith Green, Cheryl Harris, Megan Boxman	NKSD Bond Sponsored by Dennis Scott Henden	NKSD Bond: Alleged violation of RCW 42.17A.320 for failure to provide complete sponsor identification on campaign website (EY'24, DEC'23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/146686
146290	Ryan Davey	Ben Lund	Lund, Ben: Alleged Violations of RCW 42.17A.320 for lack of sponsor id on advertisement (EY23, Dec23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/146290
144844	Robert Wright	Valerie Sasson	Sasson, Valerie: Alleged violation of RCW 42.17A.320 for failure to provide sufficient sponsor id on campaign advertising. (EY23, NOV23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144844
144761	Kara Aley	Ed Nadler	Nadler, Ed: Alleged violation of RCW 42.17A.320 for failure to include sufficient sponsor id on campaign advertising. (EY23, NOV23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144761
144628	Andreas Koeppen	Connecting Communities PAC	Connecting Communities PAC: Alleged violation of RCW 42.17A.320 for failure to provide adequate sponsor identification on political advertising (EY23, Oct23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144628
144583	Dwight A Thompson	Kurcinka Josh	Kurcinka, Josh: Alleged violation of RCW 42.17A.320 for failure to provide sufficient sponsor id on political advertising (NOV23 EY23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144583
144582	Dwight A Thompson	Macia Kara	Macias, Kara: Alleged violation of RCW 42.17A.320 for failure to provide sufficient sponsor id on political advertising	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144582
144568	Glen Morgan	John Svilarich	Svilarich, John: Alleged violation of RCW 42.17A.320 for failing to provide proper sponsor identification on campaign advertisement. (OCT23, EY23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144568
144430	Bailey Kohler, Matthew Frohlich	Robert (Bob) Peterson	Peterson, Robert (Bob): Alleged Violations of RCW 42.17A.320 for failure to disclose full sponsor id on flyer (EY23 Oct23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144430
144299	Marilyn Adams	Steve Sinwell	Sinwell, Steve: Alleged violation of RCW 42.17A.320 for failing to include sponsor identification on political advertising (EY23; Oct23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144299

144278	James McLaughlin	Mike Poirier	Poirier, Mike: Alleged violation of RCW 42.17A.320 for failure to provide proper sponsor Identification on campaign advertisements (EY'23, OCT23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144278
144170	Marilyn Adams	MARK KROESE	Kroese, Mark: Alleged violation of RCW 42.17A.320 for failure to provide proper sponsor Identification on political advertising (OCT'23, EY'23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144170
144126	Kyle Wheeler	Lewis County Republican Central Committee	Lewis County Republican Central Committee: Alleged violation of RCW 42.17A.320 for failure to provide complete sponsor identification on political advertising (EY '23; Oct '23).	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/144126
140318	Chandler Forsyth	Katey Treloar	Treloar, Katey: Alleged violation of RCW 42.17A.320(3)(a) by using a font smaller than the size required for sponsor ID on written advertising. (Jul '23; EY'23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/140318
119960	Kyle Wheeler	Rob Snaza	Snaza, Rob: Alleged Violations of RCW 42.17A.320 for failure to include party affiliation on political advertising (EY'22, Jan23)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/119960
114358	William J Bangs	Ranked Choice Voting for Seattle	Ranked Choice Voting for Seattle: Alleged Violation of RCW 42.17A.320 For failure to include full sponsorship Identification including accurate top five donor information on a campaign website (NOV'22 EY'22)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/114358
114045	Rob Sowell	Joshua Hinman	Hinman, Joshua: Alleged violation of RCW 42.17A.320 for failure to include complete sponsor ID & party preference on campaign advertising (NOV'22 EY'22)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/114045
113589	Eric Hall	Eric Hull	Hull, Eric: Alleged violation of RCW 42.17A.320 for failure to disclose full sponsor ID on political advertising. (EY '22; Oct '22)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/113589
113357	Lyn Adams	Vote FOR Clyde Hill Proposition 1	Vote for Clyde Hill Proposition 1: Alleged violation of RCW 42.17A.320 for failing to provide Sponsor Identification on political advertising campaign materials (OCT'22 EY'22)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/113357
112500	Kaylie Riddoch	Wade Nelson	SUBJECT: Nelson, Wade: Alleged violation of RCW 42.17A.320 by failing to include party preference on political advertisement (EY '22; Sept '22)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/112500
111669	Shellie McLeod	Charles Amerein	Amerein, Charles: Alleged Violation of RCW 42.17A.320 for failure to include sponsor ID & party preference on a newspaper advertisement (EY22, Aug22)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/111669

111324	Josef Kunzler	Karie Storle	Storle, Karie: Alleged violation of RCW 42.17A.320 by failing to disclose party preference on political advertising (EY22, Aug '22)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/111324
109909	Sophia Blamey	Rick Kuss	Kuss, Richard: Alleged violation of RCW 42.17A.320 for failure to include sponsor identification on all pages of the candidate's website and failure to include party affiliation on yard signs (Jun' 22 EY' 22).	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/109909
109143	Sophia Blamey	Shane Seaman	Seaman, Shane: Alleged violation of RCW 42.17A.320 for failure to include complete sponsor ID on political advertisement (EY'22; June 22)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/109143
100349	Kara Suzanne Aley	John Skansi	Skansi, John: Alleged violation of RCW 42.17A.320 for failure to include sponsor address on political advertising mailer. (EY '21; Oct '21)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/100349
100231	Kevin Reniche	Outwest Printing	Outwest Printing: Alleged violations of RCW 42.17A.320 for failure to provide Sponsor ID on political advertising. (EY'21 Oct.21)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/100231
100065	Pamela Carter	Dennis Martinez	Martinez, Dennis: Alleged Violation of RCW 42.17A.320 for failure to disclose full sponsor id on political advertisements (EY 21, Oct 21)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/100065
100019	Richard Schut	Heather Newsom	Newsom, Heather: Alleged violation of RCW 42.17A.320 for failing to include sponsor identification on political advertising. (EY '21; Oct '21)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/100019
100018	Richard Schut	Tim Verzal	Verzal, Tim: Alleged violation of RCW 42.17A.320 for failing to include sponsor identification on political advertising. (EY '21; October '21)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/100018
99846	Andrew Alexander Wiseman	Seattle For Common Sense	Seattle For Common Sense: Alleged violation of RCW 42.17A.320 by failing to include the proper sponsor identification on digital political advertisements appearing on the Seattle Times website. (EY '21, October '21)	RCW 42.17A.320	Case Closed with Written Warning	https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/99846