



**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.pdc.wa.gov

Sept. 27, 2018

Delivered electronically to "haihua_yun@hotmail.com"

Subject: PDC Case 38324

Dear Haihua (Eric) Yun:

Enclosed is a copy of an electronic letter sent to Erin Schultz, concerning the complaint filed against you alleging violations of RCW 42.17A.320 for failing to identify the sponsor on political advertising in the form of a website that opposed the candidacy of My-Linh Thai, a candidate for State Representative in the 41st Legislative District in 2018.

As noted in the letter to Ms. Schultz, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

PDC staff is reminding you about the importance of including the sponsor identification on all future political advertisements sponsored by you, including websites and blog sites. In addition, PDC staff is reminding you about the filing requirements as a political committee if receive contributions or make expenditures in support of, or opposition to, any candidate or any ballot proposition, or to file an Independent Expenditure report (C-6 report) should you spend more than \$100 of your personal funds to support or oppose any candidate or ballot proposition in 2018.

If you have questions, you may contact Alice Fiman at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at alice.fiman@pdc.wa.gov

Sincerely,

/s _____
Alice Fiman

Compliance Officer

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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Sept. 28, 2018

Delivered electronically to "erin@nwpconsulting.com"

Subject: Complaint regarding Haihua Yun, PDC Case 38324

Dear: Erin Schultz

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 13, 2018. Your complaint alleged that Haihua (Eric) Yun, an individual, may have violated RCW 42.17A.320 by sponsoring political advertising in the form of a website in opposition to a 2018 candidate for office that failed to identify or contain the required sponsor identification.

PDC staff reviewed the allegations listed in your complaint, the website in question, PDC laws and rules, and the Sept. 17, 2018 response from Haihua (Eric) Yun. As a result of staff's initial review, we found the following:

- My-Linh Thai is an incumbent School Director for the Bellevue School District, and a candidate for State Representative in the 41st Legislative District in 2018.
- RCW 42.17A.320 requires that all political advertising supporting or opposing a candidate must contain the sponsor's name and complete mailing address.

- WAC 390-18-030(4) exempts “Political advertising created and distributed by an individual using his or her own modest resources...” which is defined as “in the aggregate less than one hundred dollars to produce and distribute the advertising or less than fifty dollars to produce and distribute online political advertising...”
- In his Sept. 17, 2018, response to the allegations listed in your complaint, Haihua (Eric) Yun stated that his understanding of the PDC laws and rules, so long as he did not expend more than \$50, he was not required to disclose the website on any PDC reports. He stated that at the time you filed your complaint in July, he had spent less than \$50, and that he added his name and address to the homepage of the website once he had spent more than \$50. Based on these findings, PDC staff has determined that in this instance, no evidence supports a finding of a material violation warranting further investigation.

PDC staff is reminding Haihua (Eric) Yun about the importance of including the sponsor identification on all future political advertisements sponsored by him, including websites and blog sites. PDC staff is reminding Mr. Yun about the filing requirements as a political committee if he receives contributions or make expenditures in support of, or opposition to, any candidate or any ballot proposition, or to file an Independent Expenditure report (C-6 report) should he spend more than \$100 of his personal funds to support or oppose any candidate or ballot proposition in 2018. The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

If you have questions, you may contact Alice Fiman at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at alice.fiman@pdc.wa.gov

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: haihua_yun@hotmail.com