

Stand for Children Washington PAC
5740 Shilshole Ave NW
Suite 510
Seattle, WA 98107

November 28, 2018

Micaiah Titus Ragins
Compliance Coordinator
PO Box 40908
Olympia, WA 98504-0908

RE: Stand for Children Washington PAC
PDC Case Number 43059

Dear Mr. Ragins:

I write in response to the citizen complaint filed on behalf of Maralyn Chase for Senate 2018, which has been assigned PDC Case Number 43059. The complainant alleges that Stand for Children Washington PAC (the "PAC") misidentified the sponsor of an online political advertisement that appeared on Facebook in violation of RCW 42.17A.320 and WAC 390-18-015(6) because the name following the shorthand "paid for by" tag that Facebook requires whenever anyone posts a political ad incorrectly showed the sponsor of the ad as being "Stand for Washington Students PAC."

The PAC acknowledges that the shorthand "paid for by" tag shown in connection with the ad contained a mistake while the ad appeared on Facebook between October 25 and 30, 2018. In the midst of a very busy time, an individual employee of the vendor the PAC hired to produce the ad confused the name of the PAC when he published the ad on Facebook, omitting one word ("Children") from the PAC's name and adding another ("Students") to it.

While we regret this mistake happened in the first place, we would like to point out that the entire time the ad was online the tag contained a link that automatically called up a Facebook page (www.facebook.com/pg/wesupportjesse/about/) that conspicuously and continuously displayed the disclaimer required by RCW 42.17A.320—using the correct name of the PAC. For reference, here is a screenshot of the legal disclaimer as it appears on that page:

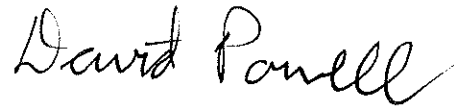
 Impressum

No candidate authorized this ad. It is paid for by Stand for Children Washington PAC, 5470 Shilshole Ave. NW, Suite 510, Seattle, WA 98107. Top Contributor: Stand for Children, Inc.

We would also like to point out that as soon as we discovered the error on October 30 in the "paid for by" tag, we instructed the vendor to halt the ads until the tag was corrected. The vendor quickly complied, and the ads resumed later that same day with the PAC's correct name appearing in the tag.

We dispute the complaint's assertion that this unintentional error in the presentation of the PAC's name in the "paid for by" tag "seriously harm[ed] the public's ability to follow the money . . ." The entire time the ad appeared on Facebook any member of the public viewing the ad would have been able to click on the tag and been automatically taken to a Facebook page containing the legally required disclaimer with the PAC's correct name. Nevertheless, the PAC does take this matter seriously, and we have taken steps to ensure that similar mistakes do not happen again in the future.

Sincerely,

A handwritten signature in black ink that reads "David Powell". The signature is written in a cursive, slightly slanted style.

David Powell
Treasurer