



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.pdcc.wa.gov

January 29, 2019

Delivered electronically to “admin@stand.org”

Subject: PDC Case 43059

Dear David Powell:

Below is a copy of an electronic letter sent to Maralyn Chase concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Maralyn Chase, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Micaiah Ragins
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcca.gov

January 29, 2019

Delivered electronically to “franco@workerlaw.com”

Subject: Complaint regarding Stand For Children Washington PAC, PDC Case 43059

Dear Danielle Franco-Malone:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 5, 2018. Your complaint alleged that the Stand For Children Washington PAC, a continuing political committee registered with the PDC, may have violated RCW 42.17A.320 by sponsoring political advertising that failed to list the correct sponsor identification on Facebook.

PDC staff reviewed your allegations, the statutes and rules, and the response from Stand For Children Washington PAC. As a result of staff’s review, we found the following:

- On July 25, 2018, Stand For Children Washington PAC filed a Committee Registration (C-1pc report) selecting the Full Reporting option.
- A political advertisement posted on Facebook listed the sponsor identification as "Paid by Stand For Washington Students PAC" and supported the candidacy of Jesse Salomon for State Senate.
- The Committee provided a response acknowledging that sponsor identification “shown in connection with the ad contained a mistake while the ad appeared on Facebook between October 25 and 30, 2018. The Campaign explained that an individual employee of the PAC’s vendor mistakenly omitted one word (“Children”) from the committee name and added a different word (“Students”). The Campaign also emphasized that the correct sponsor identification was displayed when clicking on a corresponding Facebook link.

- A complaint was filed against the Washington Association of Realtors (WAR), in PDC Case 42980, for an independent expenditure (IE) advertisement they sponsored in which Stand for Children Washington PAC was the top contributor, but were not included in the sponsor identification as required. One of the allegations was similar to your complaint, for the WAR IE advertisement which was included as part of the Facebook advertisement that stated: "We Support Jesse Salomon for State Senate: Effective, Proven Leadership" followed by information about candidate Salomon with the sponsor identification as "Paid for by Stand for Washington Students PAC."
- WAR's legal counsel stated that the Committee did not pay for the advertisement and was not the sponsor of the digital advertisement in support of Jesse Salomon that listed a nonexistent PAC as sponsor.

Based on these findings and the following facts, staff has determined that in this instance, the failure to disclose the correct sponsor identification does not amount to a material violation warranting further investigation since: (1) The Campaign acknowledged that the misspelling of the sponsor identification was an unintentional error resulting from the vendor's staff; (2) The corresponding Facebook link contained a correct version of the sponsor committee name; and (3) The failure to correctly disclose the committee name of the sponsor was inadvertent and minor in nature, and did not materially impact the public interest.

However, pursuant to WAC 390-37-060(1)(b), PDC staff issued a formal written warning to the Stand For Children Washington PAC concerning the importance of identifying the proper sponsor identification on all political advertising, including digital advertisements as required by PDC laws and rules. This formal written warning conveys staff's expectation that the Stand For Children Washington PAC will fully comply with the political advertising requirements listed above in the future as a registered continuing political committee. The Commission will consider this formal written warning if there are any future PDC law or rule violations by the Stand For Children Washington PAC.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), 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 Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Micaiah Ragins
Compliance Coordinator

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Stand For Children Washington PAC