



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action
Against

Facebook, Inc. (3)

Respondent.

PDC Case 47572

Notice of Administrative
Charges

I. JURISDICTION

The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure laws; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

II. ALLEGATIONS

Staff alleges that Facebook, Inc. (Facebook) repeatedly violated RCW 42.17A.345 by failing to maintain documents and books of account open for public inspection regarding the information specifically set forth in WAC 390-18-050. These violations occurred for political advertisements placed on Facebook concerning four 2019 Seattle City Council campaigns, and one ballot measure campaign, as follows:

1. Ari Hoffman and Ari Hoffman for Seattle City Council
2. Ethan Hunter and Ethan Hunter 4 Seattle City Council
3. Kate Martin and Put Kate on the Council
4. Logan Bowers and Logan for Seattle
5. Seattle Council PTSA

III. FACTS

1. Facebook is an international online social media and social networking service company based in Menlo Park, California. Facebook sells advertising across its platforms, including political advertising.
2. On December 28, 2018, Facebook promulgated a policy of not offering political advertising in Washington state for state and local elections.
3. A complaint filed with the PDC by Eli Sanders alleged that on February 12, 2019, Mr. Sanders sent an email to two Facebook spokespeople and Facebook's Seattle attorney, in which he shared images of 25 Facebook political ads he had found targeting local Seattle elections since January 1, 2019. These ads related to four 2019 Seattle City Council campaigns, and one ballot measure campaign, as follows:
 1. Ari Hoffman and Ari Hoffman for Seattle City Council
 2. Ethan Hunter and Ethan Hunter 4 Seattle City Council
 3. Kate Martin and Put Kate on the Council
 4. Logan Bowers and Logan for Seattle
 5. Seattle Council PTSA
4. In the email sent by Mr. Sanders, he requested "all the information that Facebook is legally required to disclose about such advertising under Washington State law (RCW 42.17A.345), the Washington State Administrative Code (WAC 390-18-050), and the Seattle Municipal Code (Section 2.04.280)."
5. Although WAC 390-18-050 required Facebook to make available the requested information "within twenty-four hours" of each ad's original distribution, Mr. Sanders agreed to receive the information within a week's time.
6. Facebook did not provide Mr. Sanders with the required information, either directly, or by providing a link to its primary website where it posts information concerning political advertising.

7. On July 29, 2019, following a July 19, 2019 in-person meeting with PDC staff, Facebook disclosed to the PDC the information requested by Mr. Sanders. The information was disclosed five months after Mr. Sanders had requested to inspect it, and was not disclosed by Facebook to Mr. Sanders. Upon receipt, the PDC forwarded the information from Facebook to Mr. Sanders.
8. The records ultimately provided by Facebook to the PDC contained most, but not all, of the items required by WAC 390-18-050. The production included the cost of each individual version of an ad, but did not include who made the payment, when it was paid, and what method of payment was used.
9. The records ultimately provided by Facebook to the PDC included the major work components or tasks, as specified in WAC 390-18-050(6)(g), “(e.g., age, gender, race, location, etc.) of the audiences targeted and reached, to the extent such information is collected by the commercial advertiser as part of its regular course of business, and the total number of impressions generated by the advertisement or communication.” However, the demographic information provided to the PDC related to the audience reached, but not to the audience targeted.

IV. LAW

RCW 42.17A.005(11) states “Commercial Advertiser” means any person who sells the service of communicating messages or producing printed material for broadcast or distribution to the general public or segments of the general public whether through the use of newspapers, magazines, television and radio stations, billboard companies, direct mail advertising companies, printing companies, or otherwise.

RCW 42.17A.345 states: (1) Each commercial advertiser who has accepted or provided political advertising or electioneering communications during the election campaign shall maintain documents and books of account that shall be open for public inspection during normal business hours during the campaign and for a period of no less than three years after the date of the applicable election. The documents and books of account shall specify:

- (a) The names and addresses of persons from whom it accepted political advertising or electioneering communications;
- (b) The exact nature and extent of the services rendered; and
- (c) The total cost and the manner of payment for the services.

(2) At the request of the commission, each commercial advertiser required to comply with subsection (1) of this section shall deliver to the commission copies of the information that must be maintained and be open for public inspection pursuant to subsection (1) of this section.

WAC 390-18-050 states: (1) "Commercial advertiser" as that term is used in the act and these rules means any person, as defined in the act, including individuals and entities, that sells the service of communicating messages or producing material for broadcast or distribution to the general public or segments of the general public whether through brochures, fliers, newspapers, magazines, television, radio, billboard, direct mail advertising, printing, paid internet or digital communications, or any other means of mass communications used for the purpose of appealing, directly or indirectly for votes or for financial or other support in any election campaign.

(2) Any person that hosts political advertising or electioneering communications on a digital communication platform or other media is not required to maintain records on such advertising or communications if it has been purchased directly through another commercial advertiser, however the commercial advertiser that directly sells the advertising or communications to the original purchaser must maintain the information as required in this section.

(3) Pursuant to RCW [42.17A.345](#), each commercial advertiser who has accepted or provided political advertising, or electioneering communications, as defined in RCW [42.17A.005](#), must maintain current books of account and related materials as required by this section. Such information must be available for public inspection by any person, without reference to, or permission from, the PDC, and provided:

- (a) In person during normal business hours; and
- (b) If requested electronically, in machine readable format and structured in a way that enables the data to be fully discoverable and useable by the end user:
 - (i) By digital transmission, such as email, promptly upon request; or
 - (ii) By online publication in one of the following formats:
 - (A) On the advertiser's primary web site;
 - (B) On a web site controlled by the advertiser, created for purposes of publishing the information required by this section, if a link is prominently displayed on the advertiser's primary web site directing users to the web site on which the information is provided; or
 - (C) On the PDC's open access platform, if one is provided by the PDC for such purpose.
- (4) Information regarding political advertising or electioneering communications must be made available within twenty-four hours of the time when the advertisement or communication initially has been publicly distributed or broadcast, and within twenty-four hours of any update or change to such information. Such records must be maintained for a period of no less than three years after the date of the applicable election.
- (5) The information and books of account that must be maintained open for public inspection pursuant to RCW [42.17A.345](#) are:
 - (a) The name of the candidate or ballot measure supported or opposed or the name of the candidate otherwise identified, and whether the advertising or communication supports or opposes the candidate or ballot measure;
 - (b) The name and address of the sponsoring person or persons actually paying for the advertising or electioneering communication, including the federal employee identification number, or other verifiable identification, if any, of an entity, so that the public can know who

paid for the advertising or communication, without having to locate and identify any affiliated entities;

(c) The total cost of the advertising or electioneering communication, or initial cost estimate if the total cost is not available upon initial distribution or broadcast, how much of that amount has been paid, as updated, who made the payment, when it was paid, and what method of payment was used; and

(d) Date(s) the commercial advertiser rendered service.

(6) In addition to subsection (5) of this section and pursuant to RCW 42.17A.345, the materials and books of account open for public inspection must include the political advertisement or electioneering communication itself, and a description of the major work components or tasks, as specified in (a) through (g) of this subsection, that were required to provide the advertising or communications services.

(a) For printers, reproducers and other persons who provide commercial duplicating services: Quantity of items, item description, design, layout, typesetting, photography, printing, silk screening, binding.

(b) For mailing services: Quantity of items mailed, binding, stuffing, labeling, list or directory services, postage or delivery.

(c) For broadcast media: Air time and number of spot advertisements. If the broadcaster provides additional services such as copy writing, talent, production, and tape reproduction, some type of record or notation evidencing the additional service must be available.

(d) For billboard or sign companies: Number and location of signs, design, printing and art work, erection/removal costs.

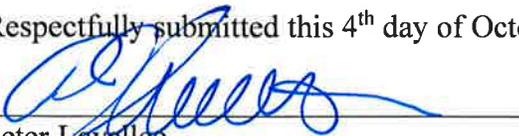
(e) For specialty or novelty commercial advertisers: Quantity of items provided, silk screening, design, printing and art work.

(f) For newspapers and other print media: Amount of advertising space and dates of publication. If the advertiser provides additional services such as design or layout, some type of record evidencing such additional services must be available.

(g) For digital communication platforms: A description of the demographic information (e.g., age, gender, race, location, etc.) of the audiences targeted and reached, to the extent such information is collected by the commercial advertiser as part of its regular course of business, and the total number of impressions generated by the advertisement or communication.

(7) At the request of the PDC, each commercial advertiser required to comply with this section shall provide to the PDC copies of the information described above.

Respectfully submitted this 4th day of October 2019.



Peter Lavallee
Executive Director



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17 and RCW 42.17A

Facebook, Inc. (3)

Respondent.

PDC Case 47572

Report of Investigation

I. BACKGROUND

- 1.1 Facebook, Inc. (Facebook) is an international online social media and social networking service company based in Menlo Park, California. It is considered one of the Big Four technology companies along with Amazon, Apple, and Google. Facebook services can be accessed from devices with internet connectivity, such as personal computers, tablets, and smartphones. After registering, users can create a customized profile revealing information about themselves. They can post text, photos and multimedia which is shared with any other users that have agreed to be their “friend.” Users can also use various embedded apps, join common-interest groups, and receive notifications of their friends’ activities. Facebook has offered the services of a Commercial Advertiser, as that term is defined in RCW 42.17A.005(11).
- 1.2 Facebook offers other products and services. For example, it acquired Instagram, WhatsApp, Oculus, and GrokStyle and independently developed Facebook Messenger, Facebook Watch, and Facebook Portal. Facebook sells advertising across its platforms, including political advertising that qualifies Facebook as a commercial advertiser, as defined in RCW 42.17A.005(11). Since December 28, 2018, after it had entered into a settlement agreement with the Attorney General’s Office for a case alleging violations as a commercial advertiser under RCW 42.17A.345, Facebook has applied a policy to not offer political advertising in Washington state.

Previous complaints concerning Facebook (April 11, 2018)

- 1.3 On April 11, 2018, Conner Edwards filed a citizen action notice (CAN) with the Attorney General’s Office (AGO), and a complaint with the Public Disclosure Commission (PDC) (Case 34055) alleging that Facebook was in violation of RCW 42.17A.345 by failing to maintain documents and books of account related to political advertising or electioneering communications. He also alleged that Facebook had failed to make books of account open

for public inspection during normal business hours for Facebook advertisements purchased to support or oppose 2017 candidates for Seattle City Council.

- 1.4 On May 26, 2018, Mr. Edwards filed a 10-Day Letter stating his intent to file a lawsuit in the name of the state of Washington if the Attorney General did not file a lawsuit.
- 1.5 On June 12, 2018, the PDC sent a case closure letter to Facebook along with a copy of a case closure letter sent to Conner Edwards, saying the PDC would not be conducting a more formal investigation into Mr. Edwards' allegations or taking further enforcement concerning his complaint. The PDC took this action because on June 4, 2018, the AGO, on behalf of the state of Washington, filed a lawsuit in King County Superior Court containing substantially similar allegations to Mr. Edwards' complaint. PDC staff informed Mr. Edwards that his complaint with the PDC was closed because the Superior Court had primary jurisdiction over the substance of his complaint, and the PDC was deferring to the Court's judgment in bringing the issues to resolution.
- 1.6 On September 19, 2018, Eli Sanders, Associate Editor of the biweekly Seattle newspaper *The Stranger*, filed a complaint with the PDC alleging that Facebook had violated RCW 42.17A.345 by failing to provide required information concerning all political ads purchased on Facebook's platforms, including Instagram, with the aim of influencing Seattle's 2018 referendum on the Employee Hours Tax commonly known as the "head tax." (Facebook, Inc. (2), PDC Case 41024)
- 1.7 On October 18, 2018, the PDC sent a letter to Attorney General Bob Ferguson, stating that pursuant to RCW 42.17A.755(4) and WAC 390-37-042, the PDC was referring PDC Case 41024 to the Attorney General's Office for appropriate action under Chapter 42.17A RCW. The referral letter noted that allegations in the CAN and complaint filed with the PDC by Conner Edwards on April 11, 2018 were substantially similar to the allegations made by Mr. Sanders in his September 19, 2018 complaint.

Lawsuit filed by Attorney General's Office (June 4, 2018)

- 1.8 On June 4, 2018, the Attorney General's Office filed a lawsuit in the name of the State of Washington, in King County Superior Court against Facebook, Inc. concerning the allegations made in the citizen action notice filed with the AGO by Conner Edwards on April 11, 2018. **(Exhibit 1)**

AGO and Facebook Settle Lawsuit (December 18, 2018)

- 1.9 On December 18, 2018, a Stipulation and Judgment was entered into between the State of Washington and Facebook, Inc., which was accepted by the King County Superior Court. The principal judgment was \$200,000 and costs and fees totaled \$38,500. The Stipulation was entered into to resolve all allegations and claims made in the State's First Amended Complaint brought under RCW 42.17A for conduct the State alleges—but Facebook, Inc. does not admit—violated state campaign finance laws from 2013 through November 30, 2018.

New Complaint Against Facebook (February 21, 2019)

1.10 On February 21, 2019, Eli Sanders filed a new complaint alleging that Facebook has again violated RCW 42.17A.345 by failing to provide requested information concerning political advertising that appeared on the Facebook platform for 2019 City of Seattle campaigns.

II. ALLEGATIONS IN COMPLAINT

2.1 On February 21, 2019, Eli Sanders filed a complaint alleging that between January 1, 2019 and February 12, 2019, Facebook sold more than two dozen political ads targeting local elections in Seattle, aimed at four Seattle City Council races and a Seattle ballot measure related to school funding. The complaint alleged that Facebook violated RCW 42.17A.345 by failing to provide the information required by the statute and WAC 390-18-050 for the following 2019 campaigns: **(Exhibit 2)**

1. Ari Hoffman and Ari Hoffman for Seattle City Council
2. Ethan Hunter and Ethan Hunter 4 Seattle City Council
3. Kate Martin and Put Kate on the Council
4. Logan Bowers and Logan for Seattle
5. Seattle Council PTSA

III. FINDINGS

3.1 Mr. Sanders stated that on February 12, 2019, he sent an email to two Facebook spokespeople and Facebook's Seattle attorney, in which he shared images of 25 Facebook political ads he had found targeting local Seattle elections since January 1, 2019.

3.2 In the email, Mr. Sanders requested "all the information that Facebook is legally required to disclose about such advertising under Washington State law (RCW 42.17A.345), the Washington State Administrative Code (WAC 390-18-050), and the Seattle Municipal Code (Section 2.04.280)." A copy of the email was copied into the body of the complaint.

3.3 Mr. Sanders said he filed the complaint because after more than a week, he had received no response from Facebook. He asked the PDC to investigate Facebook's actions and take steps to enforce existing transparency rules and laws.

3.4 Mr. Sanders' request to Facebook included a request for the following specific information from WAC 390-18-050 for the five campaigns listed in the complaint:

- (5)(a) The name of the candidate or ballot measure supported or opposed or the name of the candidate otherwise identified, and whether the advertising or communication supports or opposes the candidate or ballot measure;
- (5)(b) The name and address of the sponsoring person or persons actually paying for the advertising or electioneering communication, including the federal employee identification number, or other verifiable identification, if any, of an entity, so that the

public can know who paid for the advertising or communication, without having to locate and identify any affiliated entities;

- (5)(c) The total cost of the advertising or electioneering communication, or initial cost estimate if the total cost is not available upon initial distribution or broadcast, how much of that amount has been paid, as updated, who made the payment, when it was paid, and what method of payment was used;
- (5)(d) Date(s) the commercial advertiser rendered service.
- (6) ... the political advertisement or electioneering communication itself, and a description of the major work components or tasks, as specified in (a) through (g) of this subsection, that were required to provide the advertising or communications services;
- (6)(g) For digital communication platforms: A description of the demographic information (e.g., age, gender, race, location, etc.) of the audiences targeted and reached, to the extent such information is collected by the commercial advertiser as part of its regular course of business, and the total number of impressions generated by the advertisement of communication.

3.5 Mr. Sanders noted that although WAC 390-18-050 requires the information on political advertising to be available to the public “within twenty-four hours” of each ad’s original distribution, he told Facebook he would be happy to receive the information within a week’s time.

Content of Facebook Ad Archive for Five Campaigns Cited in Complaint

3.6 On April 9, 2019, Eli Sanders provided PDC staff with a link to a drop box containing screen shots from Facebook’s Ad Archive showing local Facebook ads related to politics since the beginning of 2019. He said he found at least 100 ads that appear to clearly fall under Washington’s definition of “political ads” as they relate to candidates for local elections, or in one case, a local ballot measure.

3.7 An examination of the Ad Archive for the five campaigns cited in the complaint shows the following information for political ads:

- The name of the candidate or ballot measure featured in the ad: While it does not separately state whether the ad supports or opposes the candidate or ballot measure, it is clear from reading the ad whether it supports or opposes the candidate or ballot measure.
- Paid for by or Sponsored by: This phrase is followed by the name of the sponsor, which is most often the name of the candidate, the candidate’s committee, or the ballot measure committee. The mailing address of the sponsor is not listed, although a campaign website is often listed.
- The Ad Itself: Each ad that is run is placed in the Ad Archive.

- Demographic Information or Audience Breakdown: (Age, Gender, Location) For age, there are separate bar graph columns for ages 18-24, 25-34, 45-54- 55-64, and 65+. For Gender, there are separate bar graph columns for Men, Women, and Unknown. For Location, the Ad Archive lists “Washington.”
- Whether ad is Active or Inactive: If Active, a green button is shown along with the date the ad started running. If Inactive, no button is highlighted, and both the start and end dates of the ad run are listed.
- Number of Impressions: The number of impressions is shown as a range (e.g. <1K, which means “less than 1,000 impressions”; 5K – 10K, which means 5,000 - 10,000 impressions; 10K – 50K which means 10,000 – 50,000 impressions, etc.) The exact number of impressions is not shown. The demographic information and the number of impressions relates to the audience reached, not the audience targeted, as contemplated by WAC 390-18-050.
- Cost or Money Spent: The cost, or money spent, is shown in a range (e.g. < \$100 which means less than \$100; \$100 - \$499, etc.) The exact cost of the advertising or electioneering communication, the date paid, and the method of payment are not shown.

3.8 Following are examples of what was available in the Facebook’s Ad Archive on April 9, 2019 for the five campaigns cited in Mr. Sanders’ complaint. This or similar information was available to the general public on February 12, 2019, the date the complainant requested advertising information from Facebook.

- Ari Hoffman and Ari Hoffman for Seattle City Council (**Exhibit 3**)
- Ethan Hunter and Ethan Hunter 4 Seattle City Council (**Exhibit 4**)
- Kate Martin and Put Kate on the Council (**Exhibit 5**)
- Logan Bowers and Logan for Seattle (**Exhibit 6**)
- Seattle Council PTSA (**Exhibit 7**)

3.9 On February 26, 2019, PDC staff sent a copy of the complaint to Facebook, through their Seattle attorney, asking for a response to the allegations by March 12, 2019. On March 7, 2019, Facebook’s attorney informed the PDC that Craig Primis and Mary Miller of the Washington DC law firm Kirkland & Ellis, would be representing Facebook, and asked that all future correspondence be directed to Kirkland & Ellis.

3.10 On March 12, 2019, Facebook responded to the complaint through Craig Primis of Kirkland & Ellis. (**Exhibit 8**) Mr. Primis stated that as of December 28, 2018, Facebook was no longer accepting or allowing political advertising targeted at the State of Washington that relates to Washington state or local elected officials, candidates, elections or ballot initiatives. He stated that to enforce its ban of Washington Political Ads on its platform, Facebook screens political ads targeting Washington state using a list of nearly 1,000 key

words, including Washington state and local candidates and elected officials, by name, elections, and ballot initiatives. He said political ads that target only Washington state and hit on any key words are rejected. He said when ads are rejected, the advertiser receives a notification that its ad was in violation of Facebook's policy prohibiting Washington Political ads and is no longer running on the platform. He said Facebook continues to make efforts to update and improve its Washington state candidate list for enforcement purposes.

3.11 Mr. Primis stated that if political ads are posted in violation of its policy, and are subsequently removed from the platform, the information about the ads remain in Facebook's Ad Archive to ensure transparency in political advertising. He said the ads identified in Mr. Sanders' complaint have been rejected and removed from Facebook's platform, but remain in the Ad Archive with information including who paid for the ads, the content of the ads, whether the ads were active or inactive, the duration the ads were posted, and information about the number of impressions the ads received, and the demographic and geographic composition of the users who saw the ads.

3.12 Mr. Primis stated that the PDC should dismiss the complaint for the following reasons:

- *First*, Mr. Primis said the PDC should dismiss the complaint because Facebook is not a "commercial advertiser" under RCW 42.17A because it is not accepting, providing, or selling Washington political ads. He said Facebook's Advertising Policies prohibit users from purchasing Washington Political Ads, and Facebook reviews ads and rejects prohibited ads pursuant to its policy.
- *Second*, Mr. Primis said the PDC should dismiss the complaint because Mr. Sanders' claims are preempted by federal law. He said Section 230 of the Communications Decency Act (CDA) bars claims that would impose liability on interactive computer service providers like Facebook for decisions relating to the screening, monitoring, or removal of third-party content. He said Mr. Sanders' complaint seeks to hold Facebook liable for failing to adequately screen and remove certain pieces of Washington political advertising from its platform. Mr. Primis said Mr. Sanders' complaint is also preempted by Section 270(a) of the Stored Communications Act (SCA) which requires Facebook to keep certain user information private. Mr. Primis asserted Washington's law broadly mandates that some private user information and advertising content cannot be disclosed to the government and members of the public without a formal legal process or as part of a civil or regulatory investigation. He stated that the SCA requires that, absent a subpoena, court order, or other exception, providers must keep user information and advertising content private. He said the SCA conflicts with, and likely preempts, Washington Disclosure Law. He stated that a federal court has also found that a statutory scheme with disclosure requirements similar to those in Washington's Disclosure Law raises important First Amendment concerns.
- *Finally*, Mr. Primis stated that the PDC should decline to pursue Mr. Sanders' Complaint against Facebook because Facebook has made a good-faith effort to comply with Washington's Disclosure Law and to increase political advertising transparency on its platform. He said Facebook's efforts to comply with the

Disclosure Law and increase transparency promote the policies and interests underlying the Disclosure Law. He said Facebook remains broadly committed to transparency in political advertising on its platform. On May 24, 2018, Facebook created an Ad Archive for the stated purpose of providing timely and meaningful public access to accurate information about political advertising.

- Mr. Primis concluded by stating that the advertisements at issue in Mr. Sanders' complaint were temporarily displayed in violation of Facebook's clear policies, and were promptly removed when discovered, with no harm to the public. He said information relating to these inadvertently displayed advertisements, including information required to be disclosed under Washington's Disclosure Law, remains accessible to the public in Facebook's Ad Archive.

3.13 While Facebook's Ad Archive includes helpful information about the advertisements placed by the five campaigns cited in Eli Sanders complaint, it does not include all information required by RCW 42.17A.345, as implemented by WAC 390-18-050. Mr. Primis' March 12, 2019 response letter did not include the information requested by Mr. Sanders concerning the five City of Seattle campaigns.

Follow-up request for information from Facebook (May 1, 2019)

3.14 On May 1, 2019, PDC staff sent a follow-up letter to Facebook, acknowledging its claim that Facebook is no longer a commercial advertiser subject to RCW 42.17A.345 and WAC 290-18-050, because of its December 28, 2018 policy to no longer accept or allow political advertising targeted at the State of Washington, because of the applicability of the Communications Decency Act (CDA), and because of the Stored Communications Act (SCA). **(Exhibit 9)**

3.15 In the May 1, 2019 follow-up letter, staff asked for information by May 10, 2019, concerning transactions between the campaigns listed below and Facebook during the period January 1, 2019 through February 21, 2019:

1. Ari Hoffman and Ari Hoffman for Seattle City Council
2. Ethan Hunter and Ethan Hunter 4 Seattle City Council
3. Kate Martin and Put Kate on the Council
4. Logan Bowers and Logan for Seattle
5. Seattle Council PTSA

3.16 The information requested for each campaign included:

- The names and addresses of the persons listed above.
- The exact nature and extent of the services rendered.
- The total cost and the manner of payment for services.

- The name of the candidate or ballot measure supported or opposed, or the name of the candidate otherwise identified, and whether the advertising or communication supports or opposes the candidate or ballot measure.
- The name and address of the sponsoring person or persons actually paying for the advertising or electioneering communication, including the federal employee identification number, or other verifiable identification, if any, if the sponsoring person or persons actually paying for the advertising or electioneering communication is an entity.
- The total cost of the advertising or electioneering communication, how much of that amount has been paid, who made the payment, when it was paid, and what method of payment was used.
- The dates that Facebook rendered service.
- A description of the demographic information (e.g., age, gender, race, location, etc.) of the audiences targeted and reached, to the extent such information is collected by Facebook as part of its regular course of business, and the total number of impressions generated by the advertisement of communication.

Facebook Response (May 10, 2019)

3.17 On May 10, 2019, in response to staff's May 1, 2019 request for additional information, Winn Allen responded on behalf of Facebook. Mr. Allen stated that as explained in its March 12, 2019 letter, Facebook is committed to advertising transparency, especially with respect to political advertising. He said to that end, Facebook has created an Ad Archive, which offers the public a comprehensive, searchable database of Facebook advertisements. He said with respect to advertisements relating to politics or issues of national importance, the Ad Archive contains data on active and inactive ads run on the platform since May 2018. He reiterated that Facebook no longer accepts or allows political advertising targeted at the State of Washington relating to Washington state or local elected officials, candidates, elections, or ballot initiatives. **(Exhibit 10)**

3.18 Mr. Allen restated Facebook's position that for the reasons outlined in its March 12, 2019 letter, the PDC should dismiss Mr. Sanders' complaint. *First*, because Facebook does not qualify as a "commercial advertiser" under Washington's Disclosure Law because it is not accepting, providing, or selling Washington Political Ads. *Second*, because Mr. Sanders' claims are preempted by federal law, Section 230 of the Communications Decency Act (CDA) and the Stored Communications Act (SCA).

3.19 Mr. Allen stated that much of the information Mr. Sanders and the PDC have requested has been collected and displayed in Facebook's Ad Archive, including political ads run between January 1, 2019 and February 21, 2019, by the campaigns identified in the PDC's May 1, 2019 letter. He said that data includes the name of the candidate, the name of the individual or entity that paid for the ad, whether the ad is active or inactive, the duration the ads were posted, and information regarding the number of impressions the ads received, and the demographic and geographic composition of the users who saw the ads to the extent that information is collected and displayed in Facebook's Ad Archive.

3.20 Mr. Allen stated that on February 11, 2019, Mr. Sanders contacted Facebook, identifying a number of political advertisements relating to the Seattle City Council elections and a Seattle ballot measure he had seen on the Facebook platform since January 1, 2019. Mr. Allen said Facebook promptly removed the ads from its platform, but said certain information about the ads remains available to the public in Facebook's Ad Archive. He said on February 12, 2019, Mr. Sanders requested "all the information that Facebook is legally required to disclose" under Washington law and rules, and the Seattle Municipal Code. He said Mr. Sanders then filed a complaint with the PDC on February 21, 2019, to which Facebook responded on March 12, 2019, asking the PDC to dismiss the complaint because Facebook is not covered by the Disclosure Law and federal law preempts Mr. Sanders' claims. He said Facebook also asked the PDC to dismiss the complaint in light of Facebook's efforts to comply with Washington law and increase transparency on its platform.

3.21 Mr. Allen reiterated Facebook's position that the complaint should be dismissed because Facebook has made a good-faith effort to comply with Washington law and to increase political transparency on its platform. He said Facebook has prohibited Washington Political Ads since December 2018, and has adopted a screening process to detect and reject those ads when they are submitted by advertisers in violation of Facebook's policy. He said Mr. Sanders' has purportedly identified a handful of candidates who were able to circumvent Facebook's screening process in early 2019 and run ads they knew violated Facebook's policy. He said once Facebook learned certain candidates were not included in its key word list, it removed the ads and added the candidates to its list of key words. He said Facebook continues to enhance its screening processes to increase enforcement on its platform.

Formal Investigation and Initial Hearing (May 22, 2019)

3.22 Staff's May 1, 2019 letter also explained that in accordance with WAC 390-37-060(3), by May 22, 2019, the PDC's Executive Director would determine whether an investigation was warranted. The Executive Director decided that an investigation should be conducted, and on May 22, 2019, an investigation was initiated and an initial hearing (also referred to as a "case status review") was held pursuant to WAC 390-37-071. At the initial hearing, staff asked Facebook to provide the information requested in its May 1, 2019 letter concerning the campaigns cited in Mr. Sanders' complaint. During the initial hearing, Facebook suggested an in-person meeting with PDC staff to discuss the case. When communicating the results of the initial hearing to Facebook, staff said it would await proposed dates from Facebook for an in-person meeting.

3.23 Following the initial hearing, Facebook did not immediately provide the requested information concerning the campaigns cited in Mr. Sanders' complaint.

3.24 A date for an in-person meeting with Facebook was agreed on, and on July 19, 2019, Facebook's attorney, Winn Allen, and three Facebook employees, met with PDC staff in Olympia to discuss the case. The discussion included PDC's May 1, 2019 request for the information required under WAC 390-18-050 for the five campaigns cited in the complaint not posted in Facebook's Ad Archive. The meeting also included a discussion about Facebook maintaining compliance with RCW 42.17A.345 and WAC 390-18-050 when an

advertiser places political advertising in violation of Facebook's policy, and Facebook's screening process fails to detect and block the political ads.

3.25 During the July 19 meeting, Facebook demonstrated the type of information about political ads available, and the display format, when satisfying the disclosure requirements of WAC 390-18-050. Facebook visually displayed the information required by WAC 390-18-050 for one of the campaigns cited in Mr. Sanders' complaint, and confirmed that they would provide the same information for all five campaigns cited in the complaint to the PDC.

3.26 During the July 19 meeting Facebook employees described its privacy concerns for its users in posting all the information mandated by WAC 390-18-050 in its Ad Archive. Facebook expressed its concern that if all of the information required by WAC 390-18-050 for all political advertising was made available on a public site, such as their Ad Archive, third party actors could collect and aggregate the information from the Ad Archive, and over time, create profiles of individuals for use that would violate the privacy rights of Facebook users.

Alternative Method Suggested by Facebook for Compliance with RCW 42.17A.345 and WAC 390-18-050

3.27 Facebook explained that it has a responsibility to protect the privacy interests of its users, but indicated it does maintain a Law Enforcement Portal to provide certain user information upon request to law enforcement and government agencies. The Law Enforcement Portal consists of an internal group that triages and responds to requests for documents and information, typically in response to subpoenas, court orders, and requests from law enforcement and government agencies in the US and abroad. The information produced by the Law Enforcement Portal is more detailed than what appears in Facebook's Ad Archive.

3.28 Facebook expressed an unwillingness to provide the detailed user information to the general public through its Ad Archive, but indicated a willingness to provide the requested information directly to the PDC, pursuant to a specific request from the PDC following notice from Facebook that it had received a request from a member of the public.

3.29 Facebook asked the PDC to consider a regime that would include a member of the public requesting advertising information from Facebook, pursuant to WAC 390-18-050, Facebook forwarding the request to the PDC, the PDC requesting the information from Facebook, Facebook disclosing the information to the PDC, and the PDC releasing the information to the original requester. Facebook stated this process would better protect the privacy of its users, and would still make the information available to the requester within a reasonable timeframe.

Facebook Disclosure of Information Requested by PDC (July 29, 2019)

3.30 On July 29, 2019, following the July 19 in-person meeting, Winn Allen disclosed the information requested by PDC staff in its May 1, 2019 letter for the five campaigns cited in Mr. Sanders' complaint. Facebook obtained the information from its Law Enforcement Portal. Facebook disclosed the information while preserving its previous arguments about the applicability of Washington's Disclosure Law to Facebook, including whether Facebook

is a commercial advertiser, and whether the Communications Decency Act (CDA) or the Stored Communications Act (SCA) preempt Washington law. Facebook stated its intent is to find a way to comply with Washington's Disclosure Law going forward, even in an environment where Facebook policy does not allow political advertising in Washington state, but where advertisers find a way to circumvent Facebook's policy and place political ads. Facebook disclosed information for the following campaigns:

1. Ari Hoffman and Ari Hoffman for Seattle City Council (**Exhibit 11**)
2. Ethan Hunter and Ethan Hunter 4 Seattle City Council (**Exhibit 12**)
3. Kate Martin and Put Kate on the Council (**Exhibit 13**)
4. Logan Bowers and Logan for Seattle (**Exhibit 14**)
5. Seattle Council PTSA (**Exhibit 15**)

3.31 Facebook's July 29, 2019 disclosure of the information initially requested by the PDC on February 26, 2019, occurred after several exchanges and discussions. Facebook stated it obtained the information from its Law Enforcement Portal. Following is a summary of what was disclosed by Facebook from its Law Enforcement Portal for each of the five campaigns cited in the complaint:

3.32 The Facebook Business Records for the five campaigns include:

- General information about the account name (e.g. the name of the campaign and the type of account)
- The date range for the account
- The creator of the account
- The registered email addresses for the creator of the account

For each version of an ads, the Facebook Business Record includes some combination of the following:

- **Picture of the ad itself**
- **Photo Id** (if applicable; internal Facebook Id number)
- **Version Id** (Facebook Id for the version of the ad)
- **Start Date** (e.g. 2019-01-25 04:51:41 UTC)
- **End Date** (e.g. 2019-01-31 04:51:41 UTC)
- **Campaign Id** (Facebook Id number)
- **Number of Impressions** (e.g. 118)
- **Total Reach** (e.g. 15528)
- **Payment Account Name** (e.g. Ari Hoffman)
- **Account ID number** (Facebook Id for the account)
- **Age/Gender** (e.g. 18 – 65+; Male, Female, Unknown)
- **Reach Percent for each age/gender category** (e.g. 18-24 female 6%)
- **Region Reach (Location)** (e.g. Washington 100%)

- **Landing URI** (Where the ad appears) (e.g. <http://community.seattletimes.newsource.com/archive> ... e.g. <https://www.facebook.com/events/>)
- **Ads Targeting Information (Location)** (e.g. Living in United States: Seattle Washington (98104), Seattle (98108), Seattle (98118), etc. Age: 18 – 65+); (e.g. Living in: United States: Seattle (98118), 6222 Chatham Dr S, Seattle (+2 mi) Washington; Mount Baker Washington, Columbia City, Washington, Hillman City Washington Age: 21 – 65+)
- **Text (of ad)** (e.g. “It’s SOLUTION SUNDAY!!! The main roads have been cleared but the side streets have turned into skating rinks. On the Saul Spady Show on AM 770 KTTH. This week I suggested we get plows that can be attached to municipal trucks... etc.) (e.g. It may be snowing outside but that means people are home for me to meet in Seward Park. ...)
- **Spend (cost of ad)** (e.g. 2.48) (e.g. 99.85) (The cost of placing a particular version of the ad)

3.33 The Facebook Business Records provided by the company’s Law Enforcement Portal contained most of the items required by WAC 390-18-050. The production included the cost of each individual version of an ad, but did not include a total cost for all ads, or who made the payment, when it was paid, and what method of payment was used (WAC 390-18-050(5)(c)).

3.34 The production included the major work components or tasks, as specified in WAC 390-18-050(6)(g), “(e.g., age, gender, race, location, etc.) of the audiences targeted and reached, to the extent such information is collected by the commercial advertiser as part of its regular course of business, and the total number of impressions generated by the advertisement of communication.” However, the demographic information and the number of impressions relates to the audience reached, not the audience targeted, as contemplated by WAC 390-18-050.

3.35 Staff created a chart summarizing the information provided in the Facebook Ad Archive and the Facebook Business Records provided by the company’s Law Enforcement Portal. **(Exhibit 16)**

3.36 Staff created a review of Facebook’s advertising system to demonstrate what is collected and available to Facebook customers, and could be made available to a person requesting information under RCW 42.17A.345 and WAC 390-18-050. **(Exhibit 17)**

Facebook Starts Ad Archive (May 24, 2018)

3.37 In response to claims of foreign interference in the 2016 US Presidential election, Facebook instituted new policies requiring sponsors of political advertising to verify their identity and location.

3.38 On May 24, 2018, Facebook created an Ad Archive with the stated intent of “Shining a Light on Ads with Political Content.” According to Rob Leathern, Director of Product Management, in an article posted May 24, 2018 in Facebook’s Newsroom, at

newsroom.fb.com, Facebook decided to make big changes to the way ads with political content work on Facebook to help prevent abuse, especially during elections.

3.39 Mr. Leathern stated that starting May 24, 2018, all election-related and issue ads on Facebook and Instagram in the US must be clearly labeled – including a “Paid for by” disclosure from the advertiser at the top of the ad. He said this change was to help ensure that the public can see who is paying for the ad – which he said is especially important when the Page name doesn’t match the name of the company or person funding the ad.

3.40 He said when a person clicks on the label for an ad, they will be taken to an archive with more information, for example, the campaign budget associated with an individual ad and how many people saw it – including their age, location and gender.

3.41 Mr. Leathern said the archive can be reached by anyone in the world at facebook.com/politicalcontentads. He said people visiting the archive can see and search ads with political or issue content an advertiser has run in the US for up to seven years. He also said advertisers wanting to run ads with political content in the US will need to verify their identity and location.

3.42 Mr. Leathern said Facebook believes increased transparency will lead to increased accountability and responsibility over time – not just for Facebook but for advertisers as well. He said Facebook is investing heavily in more people and better technology to proactively identify abuse. He encouraged readers who see an ad which they believe has political content and isn’t labeled, to report it to Facebook by tapping the three dots at the top right-hand corner of the ad, and selecting “report,” and then “it refers to a political candidate or issue.” He said Facebook will review the ad, and if it falls under Facebook’s Political Advertising policy, they will take it down and add it to the archive. He said the advertiser will then be banned from running ads with political content until they complete Facebook’s authorization process, and Facebook will follow up to let the reporting individual know what happened to the ad they reported. He said this is the tool that will make it easier for the user to find problems, which is what they want.

3.43 Mr. Leathern said Facebook knows outside experts, researchers, and academics can also help by analyzing political advertising on Facebook. He said that is why Facebook is working closely with its newly-formed Election Commission and other stakeholders to launch an Application Programming Interface (API) for the archive.

3.44 Mr. Leathern said Facebook also recognizes that news coverage of elections and important issues is distinct from advocacy or electoral ads, even if those news stories receive paid distribution on Facebook. He said Facebook is working closely with news partners and are committed to updating the archive to help differentiate between news and non-news content.

3.45 Mr. Leathern said these changes will not prevent abuse entirely. He said Facebook is up against smart, creative and well-funded adversaries who change their tactics as Facebook spots abuse. He said Facebook believes these changes will help prevent future interference in elections on Facebook. Mr. Leathern’s article was updated June 4, 2018 to clarify the start of enforcement.

III. SCOPE

4.1 PDC staff reviewed the following documents, websites, etc. or took the following actions, as noted:

1. Reviewed the complaint and information provided by the complainant.
2. Reviewed Respondent's answer to the complaint.
3. Made additional inquires of Respondent and reviewed the responses received.
4. Met with Facebook employees and Facebook's legal counsel to discuss case.
5. Reviewed Facebook's Ad Archive.
6. Reviewed Facebook's disclosure from its Law Enforcement Portal
7. Reviewed Washington's Disclosure Law and Rules.

IV. LAW

RCW 42.17A.005(11) states "Commercial Advertiser" means any person who sells the service of communicating messages or producing printed material for broadcast or distribution to the general public or segments of the general public whether through the use of newspapers, magazines, television and radio stations, billboard companies, direct mail advertising companies, printing companies, or otherwise.

RCW 42.17A.345 states: (1) Each commercial advertiser who has accepted or provided political advertising or electioneering communications during the election campaign shall maintain documents and books of account that shall be open for public inspection during normal business hours during the campaign and for a period of no less than three years after the date of the applicable election. The documents and books of account shall specify:

(a) The names and addresses of persons from whom it accepted political advertising or electioneering communications;

(b) The exact nature and extent of the services rendered; and

(c) The total cost and the manner of payment for the services.

(2) At the request of the commission, each commercial advertiser required to comply with subsection (1) of this section shall deliver to the commission copies of the information that must be maintained and be open for public inspection pursuant to subsection (1) of this section.

WAC 390-18-050 states: (1) "Commercial advertiser" as that term is used in the act and these rules means any person, as defined in the act, including individuals and entities, that sells the service of communicating messages or producing material for broadcast or distribution to the general public or segments of the general public whether through brochures, fliers, newspapers, magazines, television, radio, billboard, direct mail advertising, printing, paid internet or digital communications, or any other means of mass communications used for the purpose of appealing, directly or indirectly for votes or for financial or other support in any election campaign.

(2) Any person that hosts political advertising or electioneering communications on a digital communication platform or other media is not required to maintain records on such advertising or communications if it has been purchased directly through another commercial advertiser, however the commercial advertiser that directly sells the advertising or communications to the original purchaser must maintain the information as required in this section.

(3) Pursuant to RCW 42.17A.345, each commercial advertiser who has accepted or provided political advertising, or electioneering communications, as defined in RCW 42.17A.005, must maintain current books of account and related materials as required by this section. Such information must be available for public inspection by any person, without reference to, or permission from, the PDC, and provided:

- (a) In person during normal business hours; and
- (b) If requested electronically, in machine readable format and structured in a way that enables the data to be fully discoverable and useable by the end user:
 - (i) By digital transmission, such as email, promptly upon request; or
 - (ii) By online publication in one of the following formats:
 - (A) On the advertiser's primary web site;
 - (B) On a web site controlled by the advertiser, created for purposes of publishing the information required by this section, if a link is prominently displayed on the advertiser's primary web site directing users to the web site on which the information is provided; or
 - (C) On the PDC's open access platform, if one is provided by the PDC for such purpose.

(4) Information regarding political advertising or electioneering communications must be made available within twenty-four hours of the time when the advertisement or communication initially has been publicly distributed or broadcast, and within twenty-four hours of any update or change to such information. Such records must be maintained for a period of no less than three years after the date of the applicable election.

(5) The information and books of account that must be maintained open for public inspection pursuant to RCW 42.17A.345 are:

(a) The name of the candidate or ballot measure supported or opposed or the name of the candidate otherwise identified, and whether the advertising or communication supports or opposes the candidate or ballot measure;

(b) The name and address of the sponsoring person or persons actually paying for the advertising or electioneering communication, including the federal employee identification number, or other verifiable identification, if any, of an entity, so that the public can know who paid for the advertising or communication, without having to locate and identify any affiliated entities;

(c) The total cost of the advertising or electioneering communication, or initial cost estimate if the total cost is not available upon initial distribution or broadcast, how much of that amount has been paid, as updated, who made the payment, when it was paid, and what method of payment was used; and

(d) Date(s) the commercial advertiser rendered service.

(6) In addition to subsection (5) of this section and pursuant to RCW 42.17A.345, the materials and books of account open for public inspection must include the political advertisement or electioneering communication itself, and a description of the major work components or tasks, as specified in (a) through (g) of this subsection, that were required to provide the advertising or communications services.

(a) For printers, reproducers and other persons who provide commercial duplicating services: Quantity of items, item description, design, layout, typesetting, photography, printing, silk screening, binding.

(b) For mailing services: Quantity of items mailed, binding, stuffing, labeling, list or directory services, postage or delivery.

(c) For broadcast media: Air time and number of spot advertisements. If the broadcaster provides additional services such as copy writing, talent, production, and tape reproduction, some type of record or notation evidencing the additional service must be available.

(d) For billboard or sign companies: Number and location of signs, design, printing and art work, erection/removal costs.

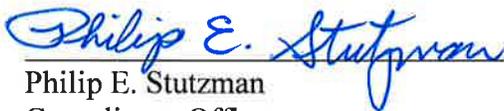
(e) For specialty or novelty commercial advertisers: Quantity of items provided, silk screening, design, printing and art work.

(f) For newspapers and other print media: Amount of advertising space and dates of publication. If the advertiser provides additional services such as design or layout, some type of record evidencing such additional services must be available.

(g) For digital communication platforms: A description of the demographic information (e.g., age, gender, race, location, etc.) of the audiences targeted and reached, to the extent such information is collected by the commercial advertiser as part of its regular course of business, and the total number of impressions generated by the advertisement of communication.

(7) At the request of the PDC, each commercial advertiser required to comply with this section shall provide to the PDC copies of the information described above.

Respectfully submitted this 4th day of October 2019.


Philip E. Stutzman

Compliance Officer



Mx. Fox Blackhorn
Compliance Coordinator 2

EXHIBIT LIST

- Exhibit 1** Lawsuit filed June 4, 2018 by Attorney General's Office against Facebook, Inc.
- Exhibit 2** Complaint filed February 21, 2019 by Eli Sanders
- Exhibit 3** Facebook Ad Archive - Ari Hoffman
- Exhibit 4** Facebook Ad Archive - Ethan Hunter and Ethan Hunter 4 Seattle City Council
- Exhibit 5** Facebook Ad Archive - Kate Martin and Put Kate on the Council
- Exhibit 6** Facebook Ad Archive - Logan Bowers and Logan for Seattle
- Exhibit 7** Facebook Ad Archive - Seattle Council PTSA
- Exhibit 8** Initial response to complaint received March 12, 2019 (Kirkland & Ellis)

- Exhibit 9** Follow-up correspondence with Facebook, sent May 1, 2019
- Exhibit 10** May 10, 2019 Facebook Response
- Exhibit 11** Facebook disclosure - Ari Hoffman
- Exhibit 12** Facebook disclosure - Ethan Hunter and Ethan Hunter 4 Seattle City Council
- Exhibit 13** Facebook disclosure - Kate Martin and Putkateonthecouncil
- Exhibit 14** Facebook disclosure - Logan Bowers and Logan for Seattle
- Exhibit 15** Facebook disclosure - Seattle Council PTSA
- Exhibit 16** Chart summarizing information provided in Facebook Ad Archive and Facebook Business Records provided by company's Law Enforcement Portal
- Exhibit 17** Review of Facebook's advertising system to demonstrate what is collected and available to Facebook customers, and could be made available to a person requesting information under RCW 42.17A.345 and WAC 390-18-050

1 Facebook is a commercial advertiser operating in the State of Washington. It accepted
2 compensation for the placement of political advertising on its platform.

3 **III. JURISDICTION AND VENUE**

4 3.1 This Court has subject matter jurisdiction over the present case, in accordance
5 with RCW 42.17A. The Attorney General has authority to bring this action pursuant to
6 RCW 42.17A.765.

7 3.2 This Court has jurisdiction over Facebook, a commercial advertiser conducting
8 business in the State of Washington. Facebook offered services and received payment from
9 persons placing political ads in Washington during each election year since 2013. The acts and
10 omissions complained of in this complaint took place, in whole or in part, in King County.

11 3.3 Venue is proper in this Court pursuant to RCW 4.12.

12 **IV. FACTUAL ALLEGATIONS**

13 4.1 RCW 42.17A declares as a matter of public policy “[t]hat political campaign
14 and lobbying contributions and expenditures be fully disclosed to the public and that secrecy is
15 to be avoided.” RCW 42.17A.001(1). The statute further provides that the state’s campaign
16 finance and disclosure law “shall be liberally construed to promote complete disclosure of all
17 information respecting the financing of political campaigns” RCW 42.17A.001.

18 4.2 RCW 42.17A.005(9) defines a “commercial advertiser” as “any person who
19 sells the service of communicating messages or producing printed material for broadcast or
20 distribution to the general public or segments of the general public whether through the use of
21 newspapers, magazines, television and radio stations, billboard companies, direct mail
22 advertising companies, printing companies, or otherwise.”

23 4.3 RCW 42.17A.005(36) defines “political advertising” to include “any advertising
24 displays, newspaper ads, billboards, signs, brochures, articles, tabloids, flyers, letters, radio or
25 television presentations, or other means of mass communication, used for the purpose of
26 appealing, directly or indirectly, for votes or for financial or other support or opposition in any

1 | election campaign.”

2 | 4.4 RCW 42.17A.005(42)(a) defines “sponsor” for the “purposes of an
3 | electioneering communications, independent expenditures, or political advertising means the
4 | person paying for the electioneering communication, independent expenditure, or political
5 | advertising. If a person acts as an agent for another or is reimbursed by another for the
6 | payment, the original source of the payment is the sponsor.”

7 | 4.5 RCW 42.17A.005(35) defines “person” as “an individual, partnership, joint
8 | venture, public or private corporation, association, federal, state, or local governmental entity
9 | or agency however constituted, candidate, committee, political committee, political party,
10 | executive committee thereof, or any other organization or group of persons, however
11 | organized.”

12 | 4.6 RCW 42.17A.345 requires each commercial advertiser who has accepted or
13 | provided political advertising or electioneering communications during an election campaign
14 | to maintain documents and books of account that shall be open to the public for their
15 | inspection during normal business hours during the campaign and for a period of no less than
16 | three years after the date of the applicable election. The law entitles any person, without
17 | reference to or permission from the Public Disclosure Commission, to inspect a commercial
18 | advertiser's political advertising or electioneering communications documents and books of
19 | account. Pursuant to WAC 390-18-050, the documents and books of account shall specify:

20 | (a) The name of the candidate or ballot measure supported or opposed or the name of
21 | the candidate otherwise identified;

22 | (b) The name and address of the person who sponsored the advertising or
23 | electioneering communication;

24 | (c) The total cost of the advertising or electioneering communication, how much of that
25 | amount has been paid, who made the payment, when it was paid, and what method of payment
26 | was used;

1 (d) Date(s) the commercial advertiser rendered service; and

2 (e) A description of the major work components or tasks that were required to provide
3 the advertising or communications services.

4 4.7 Facebook sells advertising through its advertising platform, including political
5 advertising. Accordingly, Facebook is a commercial advertiser as the term is used in RCW
6 42.17A. As such, Facebook is required to comply with RCW 42.17A.345.

7 4.8 Since January 2008, candidates and political committees required to file
8 campaign disclosure reports with the Public Disclosure Commission have reported \$3.1 million
9 in payments related to political advertising on Facebook's online platform. These payments
10 included approximately \$2.5 million paid through political consultants and other agents or
11 intermediaries, and \$619,861 paid directly to Facebook.

12 4.9 As an example, during election year 2017, candidates and political committees
13 reported making \$857,893 in payments related to political advertising on Facebook's online
14 platform.

15 4.10 Facebook did not obtain or maintain all information required under
16 RCW 42.17A.345 of commercial advertisers.

17 4.11 For example, Facebook did not obtain or maintain the names and addresses of
18 all persons from whom it accepted political advertising.

19 4.12 Additionally, as an example, Facebook did not maintain the total cost and
20 manner of payment for services it provided for political advertising.

21 4.13 Facebook did not make open for public inspection during its normal business
22 hours during any campaign from 2013 through the present documents and books of account
23 containing information on political advertising for which it accepted payment and ran on its
24 platform.

25 4.14 For example, on November 30, 2017, Eli Sanders, Associate Editor of the
26 biweekly Seattle newspaper *The Stranger*, hand-delivered a letter to Facebook at its Seattle

1 office, seeking information concerning all political advertising Facebook accepted for the
2 August 1, 2017 primary election and November 7, 2017 general election in the City of Seattle.
3 Mr. Sanders' request cited a Seattle municipal law requiring commercial advertisers to produce
4 information that is also required to be produced under RCW 42.17A.345.

5 4.15 Mr. Sanders corresponded with Facebook seeking information, including a
6 December 27, 2017 email from Mr. Sanders to Facebook, copied to Facebook's outside
7 counsel, in which Mr. Sanders noted that Washington law imposes requirements on
8 commercial advertisers similar to the relevant Seattle ordinance. Mr. Sanders noted that these
9 requirements apply to advertising sponsored in all state and local campaigns in Washington.

10 4.16 At no point did Facebook provide information concerning political advertising
11 in Seattle municipal elections to Mr. Sanders in response to his November 30, 2017 request.

12 4.17 Facebook states that prior to May 2018, it did not collect the physical mailing
13 address of persons who paid to advertise on Facebook.

14 4.18 On April 8, 2018, Conner Edwards contacted Facebook's outside counsel via
15 email and requested an appointment on April 12, 2018 to inspect Facebook's documents and
16 books of account related to political advertising. Mr. Edwards cited RCW 42.17A.345 as the
17 basis of his request. Facebook's counsel acknowledged Mr. Edwards' email on April 10, 2018,
18 but did not promise that his request for an inspection on April 12, 2018 would be honored.

19 4.19 On April 12, 2018, Mr. Edwards visited Facebook's Seattle office as intended.
20 Facebook did not provide Mr. Edwards access to any documents and books of account
21 concerning political advertising placed on Facebook's online platform.

22 4.20 On April 11, 2018, the Attorney General received a citizen action notice from
23 Mr. Edwards concerning Facebook's failure to provide public access to the information
24 required under RCW 42.17A.345.

25 4.21 In reports filed with the Public Disclosure Commission, candidates and political
26 committees reported payments to Facebook for political advertising supporting or opposing

1 selected state and local candidates.

2 4.22 During the 2013 election, sponsors of political advertising confirmed a total of
3 \$129,099 in payments to Facebook for political advertising.

4 4.23 During the 2014 election, sponsors of political advertising confirmed a total of
5 \$310,165 in payments to Facebook for political advertising.

6 4.24 During the 2015 election, sponsors of political advertising confirmed a total of
7 \$147,689 in payments to Facebook for political advertising.

8 4.25 During the 2016 election, sponsors of political advertising confirmed a total of
9 \$1,153,688 in payments to Facebook for political advertising.

10 4.26 During the 2017 election, sponsors of political advertising confirmed a total of
11 \$857,893 in payments to Facebook for political advertising.

12 4.27 To date, during the 2018 election, sponsors of political advertising confirmed a
13 total of \$74,687 in payments to Facebook for political advertising.

14 **V. CLAIMS**

15 The State re-alleges and incorporates by reference all the factual allegations contained
16 in the preceding paragraphs, and based on those allegations, makes the following claims:

17 5.1 First Claim: The State reasserts the factual allegations made above and further
18 asserts that Defendant Facebook Inc., in violation of RCW 42.17A.345, failed to maintain
19 documents and books of account with the statutorily required information for political
20 advertising sponsored in Washington state elections from 2013 through 2018. The State further
21 alleges that Defendant Facebook Inc. failed to make such documents and books of account
22 open for public inspection during normal business hours for a period of three years following
23 the applicable election.

24 5.2 Second Claim: The State reasserts the factual allegations made above and
25 further asserts that the actions of Defendant Facebook, Inc. stated in the above claims were
26 negligent and/or intentional.

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VI. REQUEST FOR RELIEF

WHEREFORE, the State requests the following relief as provided by law:

6.1 For such remedies as the court may deem appropriate under RCW 42.17A.750, including but not limited to imposition of a civil penalty, all to be determined at trial;

6.2 For all costs of investigation and trial, including reasonable attorneys' fees, as authorized by RCW 42.17A.765(5);

6.3 For temporary and permanent injunctive relief, as authorized by RCW 42.17A.750(1)(h);

6.4 In the event the Court finds Facebook intentionally violated state campaign finance disclosure laws, order any penalty assessed against Facebook to be trebled as authorized by RCW 42.17A.765(5); and

6.5 For such other legal and equitable relief as this Court deems appropriate.

DATED this 4th day of June, 2018.

ROBERT W. FERGUSON
Attorney General


LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
S. TODD SIPE, WSBA No. 46695
Assistant Attorney General
Attorneys for Plaintiff State of Washington

Complaint Description

[Eli Sanders](#) (Thu, 21 Feb 2019 at 3:43 PM)

On January 1, 2019, the Public Disclosure Commission's most recent rule-making regarding Washington State's "Commercial Advertisers' Duty to Report" took effect.

Between January 1, 2019 and February 12, 2019, commercial advertiser Facebook sold more than two dozen political ads targeting local elections in Seattle.

Those ads were aimed at four different Seattle City Council races and a Seattle ballot measure related to school funding.

I reported on this on February 12, 2019:

<https://www.thestranger.com/slog/2019/02/12/38844520/since-facebook-banned-political-ads-in-washington-state-its-sold-a-bunch-of-them>

That same day I sent an e-mail to two Facebook spokespeople and Facebook's Seattle attorney in which I shared images of the 25 Facebook political ads I'd found targeting local Seattle elections since January 1, 2019.

In that e-mail, I requested "all the information that Facebook is legally required to disclose about such advertising under Washington State law (RCW 42.17A.345), the Washington State Administrative Code (WAC 390-18-050), and the Seattle Municipal Code (Section 2.04.280)."

I noted that WAC 390-18-050 requires the information I was seeking to be delivered "promptly" to any person who makes a request.

A copy of that e-mail is pasted below. (With individuals' e-mail addresses redacted. Those e-mail addresses can be found in the evidence shared with Kim Bradford.)

Although WAC 390-18-050 makes clear that information on local political ads must be available to the public "within twenty-four hours" of each ad's original distribution, I said in my e-mail that I would be happy to receive the information I'd requested within a week's time.

More than a week has now passed and I've received no response from Facebook.

To protect the public's right to receive information about the funding and reach of local political ads in Washington State, I request that the PDC investigate Facebook's actions in this instance and take steps to enforce existing transparency rules and laws for the benefit of all Washington State residents.

Thank you.

--

Below is the text of the e-mail I sent on February 12, 2019 requesting local political ad information from Facebook:

From: Eli Sanders

Subject: Request for information on Facebook political ads in Washington State

Date: February 12, 2019 at 2:40:36 PM PST

To: Beth Gautier, Devon Kearns

Cc: "Stafford, Ben (SEA)", "Barnett, Wayne", Kim Bradford

Hi Beth and Devon,

Thank you for your help in recent days. I'd like to know more about the Facebook political ads we've been discussing, so this is a formal request for information on certain Facebook political ads aimed at Washington State elections and ballot measures since January 1, 2019.

Based on my past experience with similar requests, I am copying a few other people on this e-mail.

My hope in copying them is simply to avoid confusion and allow us all to begin on the same page. The people I've cc'd on this e-mail are: Ben Stafford, who I understand to be Facebook's Washington State attorney for such matters; Wayne Barnett, the Executive Director of the Seattle Ethics and Elections Commission; and Kim Bradford, the spokesperson for the Washington State Public Disclosure Commission.

As you know, today I reported on more than two dozen Facebook political ads aimed at Washington State elections and ballot measures since January 1, 2019.

<https://www.thestranger.com/slog/2019/02/12/38844520/since-facebook-banned-political-ads-in-washington-state-its-sold-a-bunch-of-them>

I have already shared screenshots of these ads with both of you, and Facebook has publicly stated that these ads will remain available in Facebook's public-facing ad archive going forward.

For the 25 Facebook ads whose screenshots I've already shared with Facebook (and that are attached below), I would like to receive all the information that Facebook is legally required to disclose about such advertising under Washington State law ([RCW 42.17A.345](#)), the Washington State Administrative Code ([WAC 390-18-050](#)), and the Seattle Municipal Code ([Section 2.04.280](#))

Please note that under WAC 390-18-050, Facebook's required disclosures for each ad include, but are not limited to:

- "The name of the candidate or ballot measure supported or opposed or the name of the candidate otherwise identified, and whether the advertising or communication supports or opposes the candidate or ballot measure"

- "The name and address of the sponsoring person or persons actually paying for the advertising or electioneering communication, including the federal employee identification number, or other verifiable identification, if any, of an entity, so that the public can know who paid for the advertising or communication, without having to locate and identify any affiliated entities"

- "The total cost of the advertising or electioneering communication, or initial cost estimate if the total cost is not available upon initial distribution or broadcast, how much of that amount has been paid, as updated, who made the payment, when it was paid, and what method of payment was used"

- "Date(s) the commercial advertiser [in this case, Facebook] rendered service"

- "The political advertisement or electioneering communication itself"

- "For digital communication platforms: A description of the demographic information (e.g., age, gender, race, location, etc.) of the audiences targeted and reached, to the extent such information is collected by the commercial advertiser as part of its regular course of business, and the total number of impressions generated by the advertisement of communication"

Please also note that I am making this request "electronically," as spelled out in WAC 390-18-050, and that I would prefer the information on these political ads to be sent to me "by digital transmission, such as email, promptly upon request," as likewise spelled out in WAC 390-18-050.

I will be out of town beginning this Thursday (February 14, 2019) and returning next Tuesday (February 19, 2019), so I would be happy to hear back from you about this next Tuesday.

I appreciate your time on this. Please let me know if you have any questions.

Sincerely,

Eli

Eli Sanders
Associate Editor
The Stranger
@eljsanders
www.elisanders.net

What impact does the alleged violation(s) have on the public?

Under Washington State law (RCW 42.17A.345), commercial advertisers must disclose certain details about local political ads they've sold.

This law was originally approved by an overwhelming majority of Washington voters in 1972, and rule-making by the Public Disclosure Commission has since made clear that the law applies not just to "old media" outlets such as radio stations and print newspapers, but also to "new media" platforms such as Facebook.

The aim of the law is to allow the public to understand who's paying for ads that are designed to influence voters in state and local elections, the scope of such political advertising campaigns, and exactly how the political advertising campaigns looked to those who were on the receiving end.

When commercial advertisers don't comply with state law in this area, it undercuts the law's original and ongoing aim: transparency in elections.

List of attached evidence or contact information where evidence may be found.

I've already shared relevant evidence with PDC spokesperson Kim Bradford.

List of potential witnesses with contact information to reach them.

Contact for all potential witnesses is included in the evidence shared with PDC spokesperson Kim Bradford.

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

Ad Performance



Ari Hoffman

Sponsored • Paid for by Ari Hoffman

Common Sense, Practical, Compassionate Solutions for Seattle



Ari Hoffman for Seattle City Council - Practical Solutions for Seattle

HOFFMANFORSEATTLE.COM

[Learn More](#)



Ari Hoffman

[View more ads from this Page](#)

Paid for by **Ari Hoffman**

When an advertiser categorizes their ad as being related to politics or issues of national importance, they are required to disclose who paid for the ad. [Learn more](#)

[See additional disclaimer information](#)

Ad Performance



● Inactive

Jan 7, 2019 - Jan 10, 2019

<1K
Impressions

<\$100
Money spent (USD)

Audience Breakdown



Ari Hoffman

Sponsored • Paid for by Ari Hoffman

Common Sense, Practical, Compassionate Solutions for Seattle



Ari Hoffman for Seattle City Council - Practical Solutions for Seattle

[Learn More](#)

HOFFMANFORSEATTLE.COM

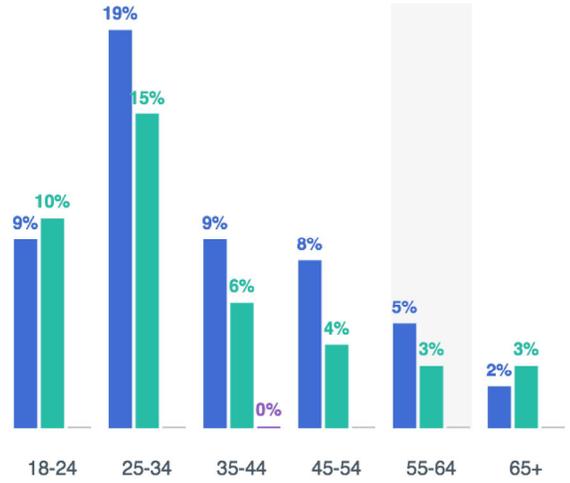
Audience Breakdown

Age and Gender

Men

Women

Unknown



Location





Ethan Hunter 4 Seattle City Council

Sponsored • Paid for by Ethan Hunter

- ◆ Address Seattle's homelessness crisis
- ◆ Create an economy that works for the poor & working class
- ◆ Address the gender and racial pay-gap,
- ◆ Make college more accessible



Ethan Hunter 4 Seattle City Council

[View more ads from this Page](#)

Paid for by **Ethan Hunter**

When an advertiser categorizes their ad as being related to politics or issues of national importance, they are required to disclose who paid for the ad. [Learn more](#)

[See additional disclaimer information](#)

Ad Performance ⓘ

● Active

Started running on Feb 5, 2019

<1K
Impressions

<\$100
Money spent (USD)

Audience Breakdown

Age and Gender

Men Women Unknown



Ethan Hunter 4 Seattle City Council

Sponsored • Paid for by Ethan Hunter

Address Seattle's homelessness crisis ✓

Create an economy that works for the poor & working class ✓

Address the gender and racial pay-gap ✓

Make college more accessible ✓



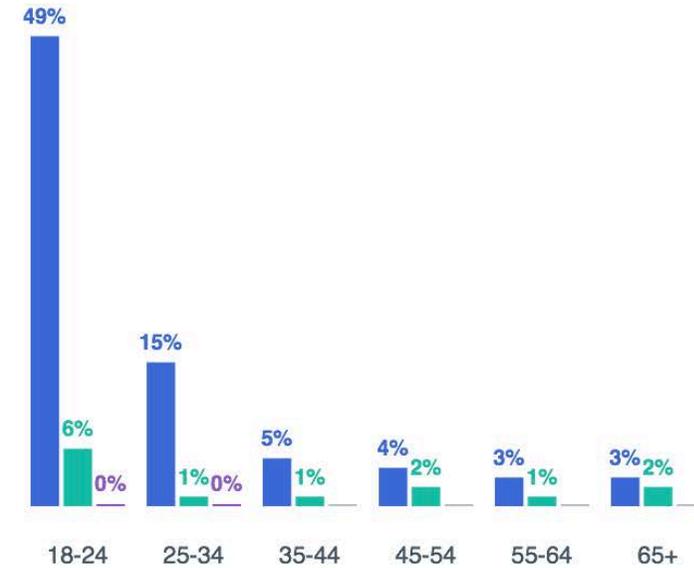
Audience Breakdown

Age and Gender

Men

Women

Unknown



Location

Washington



Ad Performance



putkateonthecouncil

Sponsored • Paid for by **Put Kate On The Council, a political committee to elect Kate Martin to the Seattle City Council District 6 position.**

Prepared. Practical. Progressive. KATE MARTIN is in the race to become the next District 6 Seattle City Councilmember.



putkateonthecouncil



putkateonthecouncil

[View more ads from this Page](#)

Paid for by **Put Kate On The Council, a political committee to elect Kate Martin to the Seattle City Council District 6 position.**

When an advertiser categorizes their ad as being related to politics or issues of national importance, they are required to disclose who paid for the ad. [Learn more](#)

[See additional disclaimer information](#)

Ad Performance



Inactive

Jan 2, 2019 - Jan 12, 2019

1K - 5K
Impressions

<\$100
Money spent (USD)

Audience Breakdown

Age and Gender

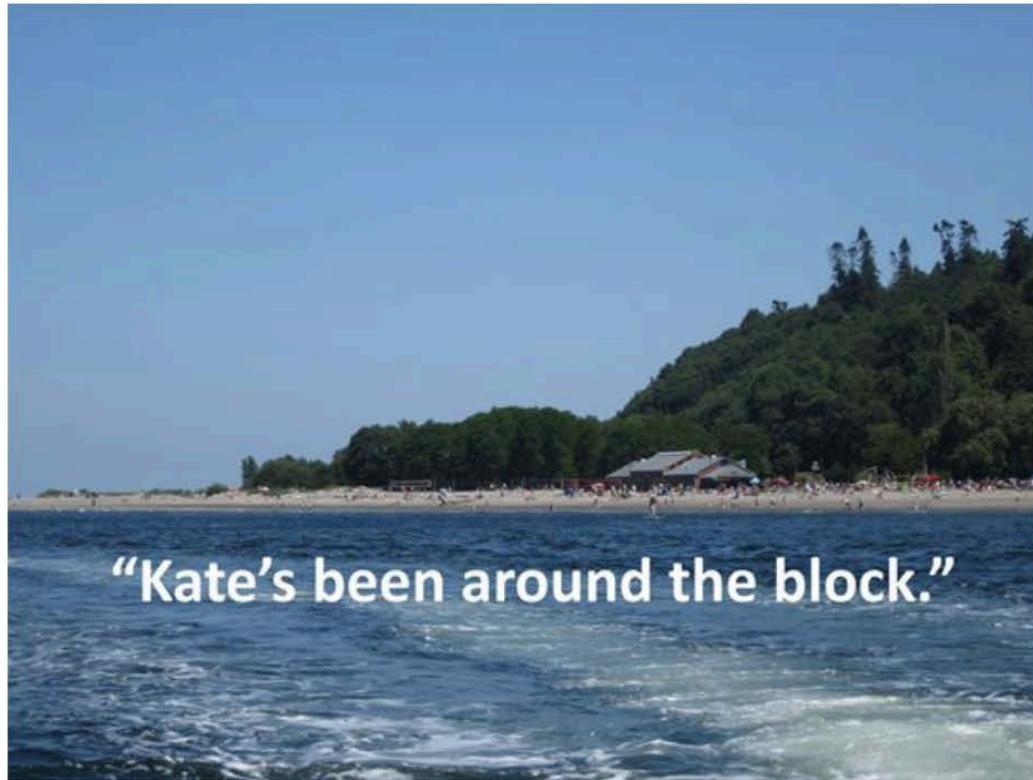
Ad Performance



putkateonthecouncil

Sponsored • Paid for by Put Kate On The Council, a political committee to elect Kate Martin to the Seattle City Council District 6 position.

Prepared. Practical. Progressive. KATE MARTIN is in the race to become the next District 6 Seattle City Councilmember.



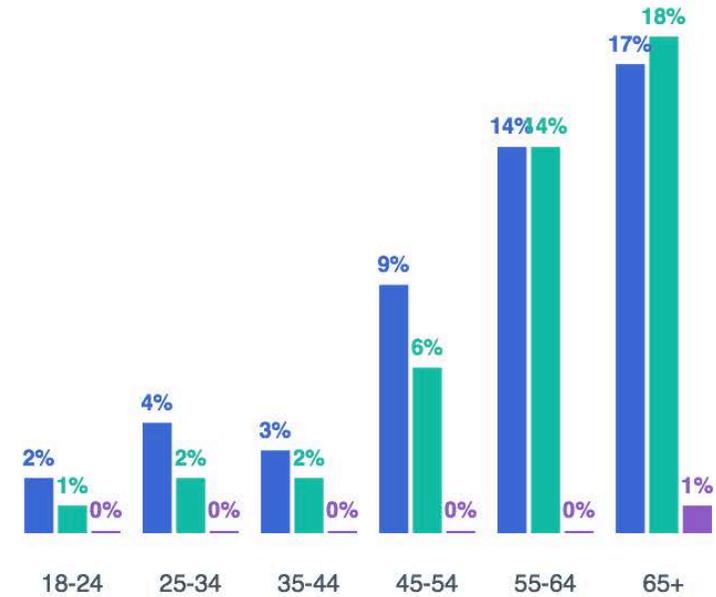
"Kate's been around the block."

putkateonthecouncil

Audience Breakdown

Age and Gender

Men Women Unknown



Location



Ad Performance



Logan for Seattle

Sponsored • Paid for by Logan For Seattle

Hi,

I'm Logan Bowers, an engineer, small business owner, and lifetime resident of Seattle. I'm running to represent District 3 on the Seattle City Council because we need someone who will listen to the district and tackle the tough problems our growing city faces: unaffordability and displacement, transportation gridlock, soaring homelessness, and the



Logan for Seattle

[View more ads from this Page](#)

Paid for by **Logan For Seattle**

When an advertiser categorizes their ad as being related to politics or issues of national importance, they are required to disclose who paid for the ad. [Learn more](#)

[See additional disclaimer information](#)

Ad Performance

Inactive

Started running on Jan 25, 2019

<1K
Impressions

<\$100
Money spent (USD)

Audience Breakdown

Age and Gender

Men **Women** **Unknown**

Ad Performance



Logan for Seattle

Sponsored • Paid for by Logan For Seattle

Hi,

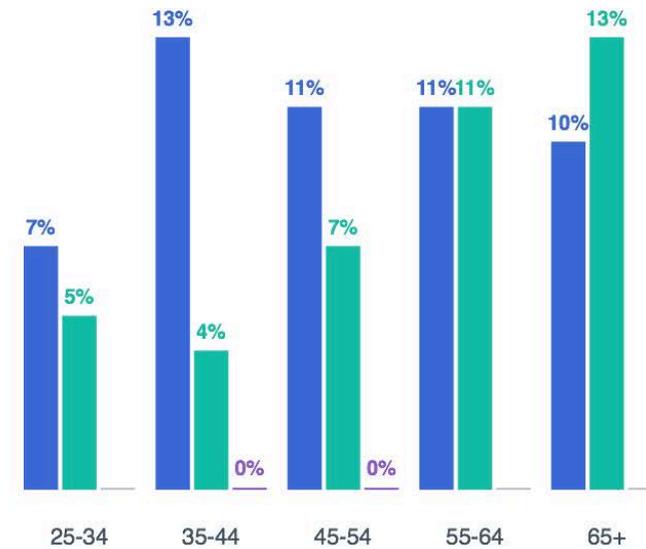
I'm Logan Bowers, an engineer, small business owner, and lifetime resident of Seattle. I'm running to represent District 3 on the Seattle City Council because we need someone who will listen to the district and tackle the tough problems our growing city faces: unaffordability and displacement, transportation gridlock, soaring homelessness, and the



Audience Breakdown

Age and Gender

Men Women Unknown



Location





Seattle Council PTSA
Sponsored

Have you turned in your ballot yet? Do you have questions about the School Levies Propositions 1 & 2? We did! Our General Membership did!

As such we spent some some researching and basking very hard questions that ultimately led us to our endorsement. We summarize and acknowledge the difficult issues raised by ongoing local levy dependence for basic education here. Please take a look.



Seattle Council PTSA
[View more ads from this Page](#)

This ad ran without a "Paid for by" label. After the ad started running, we determined that the ad was related to politics and issues of national importance and required the label. The ad was taken down.

Ad Performance

● Active

Started running on Feb 9, 2019

<1K
Impressions

<\$100
Money spent (USD)

Audience Breakdown

Age and Gender

Men Women Unknown

18%



Seattle Council PTSA
Sponsored

Have you turned in your ballot yet? Do you have questions about the School Levies Propositions 1 & 2? We did! Our General Membership did!

As such we spent some some researching and basking very hard questions that ultimately led us to our endorsement. We summarize and acknowledge the difficult issues raised by ongoing local levy dependence for basic education here. Please take a look.



● Active

Started running on Feb 9, 2019

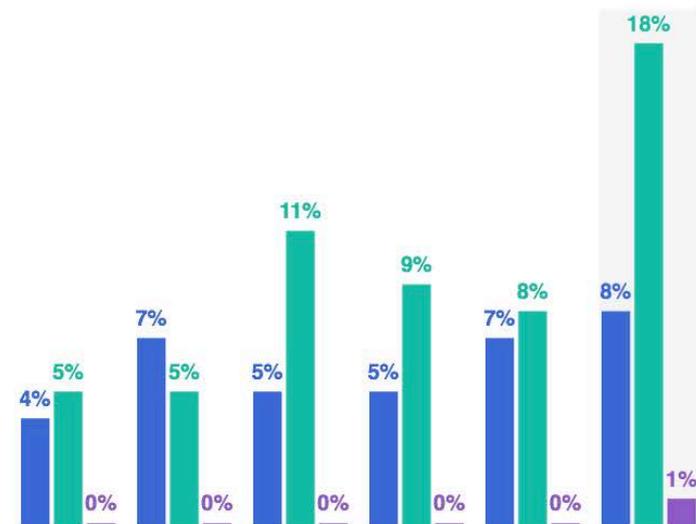
<1K
Impressions

<\$100
Money spent (USD)

Audience Breakdown

Age and Gender

Men Women Unknown



KIRKLAND & ELLIS LLP
AND AFFILIATED PARTNERSHIPS

1301 Pennsylvania Ave, N.W.
Washington, D.C. 20004
United States
+1 202 389 5000
www.kirkland.com

Craig S. Primis, P.C.
To Call Writer Directly:
+1 202 389 5921
craig.primis@kirkland.com

Facsimile:
+1 202 389 5200

March 12, 2019

VIA E-MAIL

Mx. Fox Blackhorn
Compliance Coordinator 2
Public Disclosure Commission
711 Capitol Way, Room 206
PO Box 40908
Olympia, WA 98504-0908

Re: Response to Complaint Filed by Eli Sanders

Dear Mx. Blackhorn:

I write on behalf of Facebook, Inc. (“Facebook”) in response to the Complaint filed by Eli Sanders on February 21, 2019. The Complaint contends that certain political advertisements appeared on Facebook’s platform and that Facebook did not “promptly” respond to Mr. Sanders’ request for information pursuant to RCW 42.17A.345 (“the Disclosure Law”), Washington’s Administrative Code 390-18-050, and Seattle’s Municipal Code § 2.04.280.

Facebook is committed to advertising transparency, especially for political advertisements. To that end, it has adopted policies to increase transparency on its platform and promote responsible advertising. However, as of December 28, 2018, Facebook no longer accepts or allows political advertising targeted at the state of Washington that relates to Washington state or local elected officials, candidates, elections or ballot initiatives (“Washington Political Ads”). For this and other reasons, the Public Disclosure Commission (“PDC”) should dismiss the Complaint. *First*, Facebook does not qualify as a “commercial advertiser” under Washington’s Disclosure Law because it is not accepting, providing, or selling Washington Political Ads. In fact, Facebook’s Advertising Policies prohibit users from purchasing Washington Political Ads,¹ and Facebook reviews and rejects them pursuant to that policy. *Second*, Mr. Sanders’ claims are preempted by federal law. Section 230 of the Communications Decency Act (“CDA”) bars claims that would impose liability on interactive computer service providers like Facebook for decisions relating to

¹ Facebook, *Advertising Policies - Restricted Content - 10.a Ads related to Politics or Issues of National Importance*, https://www.facebook.com/policies/ads/restricted_content/political (last visited Mar. 12, 2019).

Fox Blackhorn
March 12, 2019
Page 2

the screening, monitoring, or removal of third-party content. 47 U.S.C. § 230. That is exactly what Mr. Sanders' Complaint does here: it seeks to hold Facebook liable for failing to adequately screen and remove certain pieces of Washington political advertising from its platform. Those claims are barred by CDA § 230. The Complaint is also preempted by § 2702(a) of the Stored Communications Act ("SCA") which requires Facebook to keep certain user information private. 18 U.S.C. § 2702(a). Because Washington law mandates disclosure where the SCA prohibits it, Facebook cannot comply with both statutes. Mr. Sanders' claims are thus preempted by the SCA and should be dismissed. *Finally*, even if Facebook were subject to Washington's Disclosure Law, the PDC should exercise its discretion and decline to pursue Mr. Sanders' Complaint because Facebook's efforts to comply with Washington law and increase transparency on its platform promote the policies and interests underlying the Disclosure Law.

A. Issue and Background

On February 11, 2019, Mr. Sanders contacted Facebook, identifying a number of political advertisements relating to the Seattle city council elections and a Seattle ballot measure he had seen on the platform since January 1, 2019. 2/21/19 Compl. at 1. Although those ads were promptly removed from Facebook because they violated Facebook's policies, certain information about the advertisements remains available to the public in Facebook's Ad Archive. *Id.* at 2. Mr. Sanders requested "all the information that Facebook is legally required to disclose" under Washington law, the Washington Administrative Code, and the Seattle Municipal Code. *Id.* On February 21, 2019, Mr. Sanders filed this Complaint with the PDC.

B. Facebook does not qualify as a "commercial advertiser" subject to the disclosure requirements of Washington law.

The Complaint should be dismissed because Facebook does not "accept[] or provide[] political advertising or electioneering communications" related to Washington's state or local elected officials, candidates, elections or ballot initiatives in Washington. *See* RCW 42.17A.345. To the contrary, Facebook prohibits Washington Political Ads, and it therefore does not qualify as a "commercial advertiser" subject to the disclosure requirements of Washington law.

Before turning to Facebook's policies in Washington specifically, it is worth noting that Facebook reviews and screens political advertising content nationally to increase transparency on its platform. Pursuant to Facebook's policies, all advertisers must complete a verification process to post any political ads targeting the U.S. on the platform, and they must declare all ads containing political content as such when seeking to post them in the U.S. When an ad targets the U.S., Facebook also proactively reviews it for any U.S.-related political content. If such an ad is political but not declared as such by the advertiser, it will be rejected.

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As of December 28, 2018, Facebook no longer allows Washington Political Ads. If Facebook determines that an advertiser is attempting to place an ad that targets Washington state, and mentions a Washington state city, county, or state candidate, elected official, election or ballot initiative, Facebook rejects the ad. Facebook's policy prohibiting Washington Political Ads is clearly stated on its site.² Facebook also notifies advertisers who seek to post political ads that Facebook prohibits political advertisements targeting Washington. Thus, any Washington Political Ad that appears on Facebook is in violation of Facebook's policy.

To enforce its ban on Washington Political Ads on the platform, Facebook screens political ads targeting Washington state using a list of nearly 1,000 key words, including Washington state and local political candidates, elected officials, elections and ballot initiatives.³ Political ads that target only Washington state and hit on any of the key words are rejected. On a daily basis, Facebook also reviews all political ads delivered to Washington state to ensure compliance with its policies, and retroactively rejects any that are noncompliant. In both cases, when such ads are rejected, the advertiser receives a notification from Facebook that its advertisement was in violation of Facebook's policy prohibiting Washington Political Ads and is no longer running on the platform.⁴

In early 2019, Facebook discovered that its key word list did not yet include certain Washington state political candidates. Those candidates have since been added and advertisements containing those candidates' names would be rejected. Facebook continues to make efforts to update and improve its Washington state candidate list for enforcement purposes, including engaging in discussions with a third-party provider to update the list on a more-frequent basis.

While Facebook does not accept state and local political ads in Washington, advertisements posted in violation of this policy, even if subsequently removed from the platform, are nevertheless included in Facebook's Ad Archive. Facebook includes all ads that were delivered to ensure transparency in political advertising, even for those ads that were posted in violation of Facebook's policies. For example, here, even though the ads Mr. Sanders identified were ultimately rejected and removed from the platform, Mr. Sanders was able to access extensive information about the

² See https://www.facebook.com/policies/ads/restricted_content/political.

³ "Political ads" are ads that the advertiser has declared to be political via Facebook's political ads procedures.

⁴ If an advertiser is using Facebook on a desktop computer, the notification provides: "This ad isn't running because it relates to politics focusing on Washington State. At this time, you may not run ads related to politics in or targeted at the state of Washington that relate to Washington's state or local elected officials, candidates, elections or ballot initiatives. Please see our Advertising Policies to learn more. No further action may be taken at this point."

If an advertiser is using Facebook on a mobile device, the notification provides: "This ad isn't running because we no longer accept Washington State electoral ads."

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advertisements themselves, including who paid for them, the content of the ads, whether the ads were active or inactive, the duration the ads were posted, and information regarding the number of impressions the ads received and the demographic and geographic composition of the users who saw the ads.

C. The Complaint is preempted by federal law.

The PDC should also dismiss the Complaint because it is preempted by two federal statutes: the Communications Decency Act, 47 U.S.C. § 230, and the Stored Communications Act, 18 U.S.C. § 2702(a).

Section 230 of the CDA bars any claim seeking to hold interactive computer service providers liable for decisions relating to the screening or removal of third-party content. 47 U.S.C. § 230(c)(1) (“No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider.”). Mr. Sanders’ claims fall squarely within the immunity afforded by § 230(c). An “important purpose of § 230 was to encourage service providers to self-regulate” material posted on their platforms by filtering and removing harmful or offensive third-party content. *Zeran v. Am. Online, Inc.*, 129 F.3d 327, 331 (4th Cir. 1997). Recognizing that it was “impossible for service providers to screen each of their millions of postings for possible problems,” however, Congress provided broad immunity to service providers like Facebook that sought to do so. *Id.* Section 230 thus shields service providers from liability “when they remove[] some—but not all—offensive material from their websites.” *Bennett v. Google, LLC*, 882 F.3d 1163, 1166 (D.C. Cir. 2018). As the Ninth Circuit has recognized, claims that a website “failed to review each user-created profile” to detect and remove unlawful content “is precisely the kind of activity for which Congress intended to grant absolution with the passage of section 230.” *Fair Hous. Council of San Fernando Valley v. Roommates.com, LLC*, 521 F.3d 1157, 1171–72 (9th Cir. 2008) (en banc). The Complaint seeks to hold Facebook liable for explicitly protected activity—failing to detect and remove certain pieces of political advertising that were created and posted on the platform by third parties in violation of Facebook’s policies. Such claims are indisputably barred by § 230. *See, e.g., Caraccioli v. Facebook, Inc.*, 700 F. App’x 588, 590 (9th Cir. 2017); *Sikhs for Justice, Inc. v. Facebook, Inc.*, 697 F. App’x 526, 526 (9th Cir. 2017); *Klayman v. Zuckerberg*, 753 F.3d 1354, 1359 (D.C. Cir. 2014).

The Complaint may also be preempted by the SCA, which generally prohibits “providers” of electronic communication services from disclosing the contents of communications stored through those services unless one of several express exceptions applies. 18 U.S.C. § 2702(a), (b). Facebook is thus generally prohibited from knowingly disclosing “a record or other information pertaining to a subscriber to or customer of such service . . . to any governmental entity” absent an exception. 18 U.S.C. § 2702(a)(3).

Fox Blackhorn
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Washington's law broadly mandates that some private user information and advertising content be disclosed to the government and members of the public without a formal legal process and not as part of a civil or regulatory investigation. *See* RCW 42.17A.345; WAC 390-18-050. Such a scheme cannot be squared with the SCA, which requires that, absent a subpoena, court order, or other exception not applicable in this case, providers must keep user information and advertising content private. The SCA thus conflicts with, and likely preempts enforcement of, Washington's Disclosure Law. *See Arizona v. United States*, 567 U.S. 387, 399 (2012) (holding that conflict preemption applies where "compliance with both federal and state regulations is a[n] . . . impossibility" (citation omitted)). A federal court has also found that a statutory scheme with disclosure requirements similar to those in Washington's Disclosure Law raises important First Amendment concerns. *See Washington Post v. McManus*, --- F. Supp. 3d ----, 2019 WL 112639 (D. Md. Jan. 3, 2019) (enjoining a similar statutory scheme on First Amendment grounds).

D. Facebook's efforts comply with the policies and interests underlying the Washington Disclosure Law.

Additionally, the PDC should decline to pursue Mr. Sanders' Complaint against Facebook because Facebook has made a good-faith effort to comply with Washington law and to increase political advertising transparency on its platform. The PDC has broad discretion to resolve matters or decline to take action when enforcement is unwarranted based on a number of factors. *See* WAC 390-37-060 to -061. This includes a party's good faith efforts where noncompliance is alleged. *See id.* As noted above, Facebook has prohibited Washington Political Ads since December 2018. To enforce that policy, Facebook has adopted screening processes designed to detect and reject political advertisements targeting Washington that were improperly submitted by advertisers in violation of Facebook's policy. Facebook continues to enhance its screening processes to increase enforcement on the platform.

Facebook also remains broadly committed to transparency in political advertising on its platform, and it is thus aligned with the PDC's "Mission" and "Vision." The PDC "was created and empowered by Initiative of the People to provide timely and meaningful public access to accurate information about the financing of political campaigns, lobbyist expenditures, and the financial affairs of public officials and candidates . . ." ⁵ Facebook has adopted policies intended to increase transparency and responsible political advertising on its platform, including its policy that requires anyone seeking to run a political advertisement targeting the United States to go through an authorization process to post on the platform.⁶ Facebook also created its Ad Archive for the

⁵ *See* Public Disclosure Commission, *About the PDC*, <https://www.pdc.wa.gov/about-pdc> (last visited Mar. 12, 2019).

⁶ *See* https://www.facebook.com/policies/ads/restricted_content/political.

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purpose of providing timely and meaningful public access to accurate information about political advertising.

Finally, the advertisements at issue here, which were temporarily displayed in violation of Facebook's clear policies, were promptly removed with no harm to the public. Moreover, information relating to these inadvertently displayed advertisements, including information prescribed under Washington's Disclosure Law, remains accessible to the public in Facebook's Ad Archive.⁷

* * *

For these reasons, Facebook requests that the PDC dismiss Mr. Sanders' Complaint.

Sincerely,

/s/ Craig S. Primis

Craig S. Primis

⁷ See Facebook, *About the Ad Archive*, <https://www.facebook.com/business/help/2405092116183307> (last visited Mar. 12, 2019).



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

May 1, 2019

craig.primis@kirkland.com

Craig S. Primis, P.C.
Kirkland & Ellis LLP
1301 Pennsylvania Ave. N.W.
Washington D.C. 20004

Subject: Initial Review of Complaint filed by Eli Sanders: Facebook, Inc. (3), PDC Case 47572

Dear Mr. Primis:

Thank you for your written response dated March 12, 2019 to the complaint filed by Eli Sanders on February 21, 2019 concerning Facebook, Inc. (Facebook). We are evaluating your response, including the statements about the applicability of RCW 42.17A.345 and WAC 390-18-050 to Facebook in light of its policy effective December 28, 2018 to no longer accept or allow political advertising targeted at the State of Washington. As part of our initial review of the allegations and the response to the complaint, staff is requesting information concerning transactions between the campaigns listed below and Facebook during the period January 1, 2019 through February 21, 2019:

1. Ari Hoffman and Ari Hoffman for Seattle City Council
2. Ethan Hunter and Ethan Hunter 4 Seattle City Council
3. Kate Martin and Putkateonthecouncil
4. Logan Bowers and Logan for Seattle
5. Seattle Council PTSA

Requested information:

- The names and addresses of the persons listed above.
- The exact nature and extent of the services rendered.
- The total cost and the manner of payment for services.
- The name of the candidate or ballot measure supported or opposed, or the name of the candidate otherwise identified, and whether the advertising or communication supports or opposes the candidate or ballot measure.
- The name and address of the sponsoring person or persons actually paying for the advertising or electioneering communication, including the federal employee

identification number, or other verifiable identification, if any, if the sponsoring person or persons actually paying for the advertising or electioneering communication is an entity.

- The total cost of the advertising or electioneering communication, how much of that amount has been paid, who made the payment, when it was paid, and what method of payment was used.
- The dates that Facebook rendered service.
- A description of the demographic information (e.g., age, gender, race, location, etc.) of the audiences targeted and reached, to the extent such information is collected by Facebook as part of its regular course of business, and the total number of impressions generated by the advertisement of communication.

Please provide the requested information no later than **Friday, May 10, 2019**.

If Facebook is not providing any of the requested information because it is claiming that Washington state law requiring disclosure of the requested information is preempted pursuant to federal law, or that the disclosure of any of the requested information is otherwise prohibited, please identify the section of federal law or other citation for each specifically requested item above that is not provided. Regardless of such claims, however, receipt of the above-described information is necessary so we may fully evaluate this matter prior to making a decision about whether to initiate an investigation. In addition, please take reasonable steps to suspend routine destruction of the requested records.

In accordance with WAC 390-37-060(3), prior to May 22, 2019 (90 days from receipt of the complaint) the executive director will determine whether an investigation is warranted. If the executive director determines that an investigation is warranted, an initial hearing (also referred to as a "case status review") will be held pursuant to WAC 390-37-071 no later than May 22, 2019. A "case status review" is not an adjudicative proceeding conducted pursuant to the Administrative Procedure Act (chapter 34.05 RCW). Its purpose is to ensure the investigation, is being conducted expeditiously and to provide an opportunity to discuss possible alternative resolutions.

If you have questions, please contact Fox Blackhorn-Delph at 360-753-1980, toll-free at 1-877-601-2828, or by e-mail at fox.blackhorn@pdc.wa.gov or Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at phil.stutzman@pdc.wa.gov.

Sincerely,



Philip E. Stutzman
Sr. Compliance Officer

cc: Peter Lavalley, Executive Director
Sean Flynn, General Counsel

May 10, 2019

VIA E-MAIL

Philip E. Stutzman
Sr. Compliance Officer
Public Disclosure Commission
711 Capitol Way, Room 206
PO Box 40908
Olympia, WA 98504-0908

Re: Response to PDC Initial Review of Complaint Filed By Eli Sanders, Case No. 47572

Dear Mr. Stutzman:

I write on behalf of Facebook, Inc. (“Facebook”) in response to your May 1, 2019 letter regarding the initial review of the Complaint filed by Eli Sanders. Mr. Sanders’ Complaint contends that certain political advertisements appeared on Facebook’s platform and that Facebook did not “promptly” respond to his request for information pursuant to RCW 42.17A.345 (the “Disclosure Law”), Washington’s Administrative Code 390-18-050, and Seattle’s Municipal Code § 2.04.280. As part of its initial review, the Public Disclosure Commission (“PDC”) requests information concerning transactions between certain campaigns and Facebook from January 1, 2019 to February 21, 2019. 5/1/19 Letter from P. Stutzman at 1. It further requests that Facebook identify “the section of federal law or other citation” that prohibits disclosure of any of the requested information not provided by Facebook at this time. *Id.* at 2.

As Facebook explained in its March 12, 2019 letter, it is committed to advertising transparency, especially with respect to political advertising. 3/12/19 Letter from C. Primis at 1. To that end, it has adopted policies to increase transparency and promote responsible advertising on its platform, and it has created an Ad Library, which offers to the public a comprehensive, searchable database of Facebook advertisements.¹ With respect to advertisements relating to politics or issues of national importance, the Ad Library contains data on active and inactive ads run on the platform

¹ Facebook, *Facebook Ad Library*, https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US (last visited May 10, 2019).

since May 2018.² As the PDC is aware, however, Facebook no longer accepts or allows political advertising targeted at the State of Washington that relates to Washington state or local elected officials, candidates, elections, or ballot initiatives (“Washington Political Ads”).

For that reason and the other reasons outlined in Facebook’s March 12, 2019 letter, the PDC should dismiss Mr. Sanders’ Complaint. *First*, Facebook does not qualify as a “commercial advertiser” under Washington’s Disclosure Law because it is not accepting, providing, or selling Washington Political Ads. In fact, Facebook’s Advertising Policies prohibit users from purchasing Washington Political Ads,³ and Facebook has a process for reviewing and rejecting them pursuant to that policy. *Second*, Mr. Sanders’ claims are preempted by federal law. Section 230 of the Communications Decency Act (“CDA”) bars claims that would impose liability on entities like Facebook for decisions relating to the screening, monitoring, or removal of third-party content. 47 U.S.C. § 230. That is exactly what Mr. Sanders’ Complaint does here: it seeks to hold Facebook liable for failing to adequately screen and remove certain pieces of Washington political advertising from its platform. Those claims are barred by CDA § 230. The Complaint may also be preempted by § 2702(a) of the Stored Communications Act (“SCA”) which requires Facebook to keep certain user information private. 18 U.S.C. § 2702(a). Because Washington law mandates disclosure where the SCA prohibits it, Facebook cannot comply with both statutes. Mr. Sanders’ claims are thus likely preempted by the SCA and should be dismissed. *Finally*, even if Facebook were subject to Washington’s Disclosure Law, the PDC should exercise its discretion and decline to pursue Mr. Sanders’ Complaint because Facebook’s efforts to comply with Washington law and increase transparency on its platform promote the policies and interests underlying the Disclosure Law.

Although the PDC should dismiss Mr. Sanders’ Complaint for those reasons, Facebook collects and displays in its Ad Library much of the information requested by Mr. Sanders and the PDC. Facebook provides data for all ads that Facebook has identified to date that relate to politics or issues of national importance and were run between January 1, 2019 and February 21, 2019, by the campaigns identified in the PDC’s May 1, 2019 letter. That data includes the name of the candidate, the name of the individual or entity that paid for the ad, whether the ad is active or inactive, the duration the ads were posted, and information regarding the number of impressions the ads received and the demographic and geographic composition of the users who saw the ads to the extent that information is collected and displayed in Facebook’s Ad Library.

² *Id.*

³ Facebook, *Advertising Policies - Restricted Content - 10.a Ads Related to Politics or Issues of National Importance*, https://www.facebook.com/policies/ads/restricted_content/political (last visited May 10, 2019).

A. Issue and Background

On February 11, 2019, Mr. Sanders contacted Facebook, identifying a number of political advertisements relating to the Seattle city council elections and a Seattle ballot measure he had seen on the platform since January 1, 2019. 2/21/19 Compl. at 1. Although those ads were promptly removed from Facebook because they violated Facebook's policies, certain information about the advertisements remains available to the public in Facebook's Ad Library. *Id.* at 2. On February 12, 2019, Mr. Sanders requested "all the information that Facebook is legally required to disclose" under Washington law, the Washington Administrative Code, and the Seattle Municipal Code. *Id.* On February 21, 2019, Mr. Sanders filed a Complaint with the PDC. Facebook responded to Mr. Sanders' Complaint on March 12, 2019, requesting that the PDC dismiss the Complaint because Facebook is not covered by the Disclosure Law and federal law preempts Mr. Sanders' claims. 3/12/19 Letter from C. Primis. It also requested that the PDC otherwise exercise its discretion to decline to pursue the Complaint in light of Facebook's efforts to comply with Washington law and increase transparency on its platform. *Id.*

B. Facebook does not qualify as a "commercial advertiser" subject to the disclosure requirements of Washington law.

The Complaint should be dismissed because Facebook does not "accept[] or provide[] political advertising or electioneering communications" related to Washington's state or local elected officials, candidates, elections or ballot initiatives in Washington. *See* RCW 42.17A.345. To the contrary, Facebook prohibits Washington Political Ads, and it therefore does not qualify as a "commercial advertiser" subject to the disclosure requirements of Washington law.

As of December 28, 2018, Facebook no longer allows Washington Political Ads to run on its platform, and it has adopted a number of screening procedures to enforce that policy. Facebook rejects any ads that it determines are targeted at Washington state and mention a Washington state city, county, or state candidate, elected official, election or ballot initiative. It clearly states its policy prohibiting Washington Political Ads on its site and notifies advertisers who seek to post political ads that Facebook prohibits political advertisements targeting Washington.⁴

Facebook also screens political ads targeting Washington state using a list of nearly 1,000 key words, including Washington state and local political candidates, elected officials, elections and ballot initiatives.⁵ Political ads that target only Washington state and hit on any of the key words are rejected. Facebook also reviews all political ads delivered to Washington state on a daily basis

⁴ *See* https://www.facebook.com/policies/ads/restricted_content/political.

⁵ "Political ads" are ads that the advertiser has declared to be political via Facebook's political ads procedures.

and retroactively rejects any that are noncompliant. Facebook notifies the advertiser that its ad was in violation of Facebook’s policy and is no longer running on the platform.⁶

As Facebook explained in its March 12, 2019 letter, it discovered in early 2019 that its key word list did not yet include certain Washington state political candidates. Those candidates have since been added such that ads containing those candidates’ names would be rejected. Facebook continues to make efforts to update and improve its Washington state candidate list, however, there is obviously a reasonable “lag time” between when a new candidate declares for a state or local election in Washington and when that new candidate is added to Facebook’s list.

Facebook includes ads that were delivered in its Ad Library, even those posted in violation of Facebook’s policy and subsequently removed, to ensure transparency in political advertising. As noted above, Facebook provides information for ads that it has identified to date that relate to politics or issues of national importance and were run between January 1, 2019 and February 21, 2019, by the campaigns at issue.

C. The Complaint is preempted by federal law.

The PDC should also dismiss the Complaint because it is preempted by two federal statutes: the Communications Decency Act, 47 U.S.C. § 230, and the Stored Communications Act, 18 U.S.C. § 2702(a).

Mr. Sanders’ claims fall squarely within the immunity provided by § 230 of the CDA, which bars any claim seeking to hold interactive computer service providers liable for decisions relating to the screening or removal of third-party content. 47 U.S.C. § 230(c)(1). Section 230 was passed to “encourage[] service providers to self-regulate” material on their platforms, and it provides broad immunity from liability “when [service providers like Facebook] remove[] some—but not all—offensive material from their websites.” *Bennett v. Google, LLC*, 882 F.3d 1163, 1166 (D.C. Cir. 2018). The Complaint seeks to hold Facebook liable for failing to detect and remove certain pieces of political advertising that were created and posted on the platform by third parties in violation of Facebook’s policies. Such claims are indisputably barred by § 230. *See, e.g., Caraccioli v. Facebook, Inc.*, 700 F. App’x 588, 590 (9th Cir. 2017); *Sikhs for Justice, Inc. v.*

⁶ If an advertiser is using Facebook on a desktop computer, the notification provides: “This ad isn’t running because it relates to politics focusing on Washington State. At this time, you may not run ads related to politics in or targeted at the state of Washington that relate to Washington’s state or local elected officials, candidates, elections or ballot initiatives. Please see our Advertising Policies to learn more. No further action may be taken at this point.”

If an advertiser is using Facebook on a mobile device, the notification provides: “This ad isn’t running because we no longer accept Washington State electoral ads.”

Facebook, Inc., 697 F. App'x 526, 526 (9th Cir. 2017); *Klayman v. Zuckerberg*, 753 F.3d 1354, 1357-59 (D.C. Cir. 2014).

The Complaint may also be preempted by the SCA, which generally prohibits “provider[s]” of electronic communication services from knowingly disclosing “a record or other information pertaining to a subscriber to or customer of such service . . . to any governmental entity” absent an exception. 18 U.S.C. § 2702(a)(3). Washington’s law requires that some private user information and advertising content be disclosed to the government and members of the public without formal legal process. *See* RCW 42.17A.345; WAC 390-18-050. Such a scheme conflicts with, and is likely preempted by, the SCA, which requires that providers keep user information and advertising content private absent a subpoena, court order, or other exception not applicable here. A federal court has also found that a statutory scheme with disclosure requirements similar to those in Washington’s Disclosure Law raises important First Amendment concerns. *See Washington Post v. McManus*, 355 F. Supp. 3d 272 (D. Md. 2019) (enjoining a similar statutory scheme on First Amendment grounds).

D. Facebook’s efforts comply with the policies and interests underlying the Washington Disclosure Law.

Additionally, the PDC should exercise its broad discretion and decline to pursue Mr. Sanders’ Complaint against Facebook because Facebook has made a good-faith effort to comply with Washington law and to increase political advertising transparency on its platform. *See* WAC 390-37-060 to -061. Facebook has prohibited Washington Political Ads since December 2018, and it has adopted screening processes designed to detect and reject those ads when they are submitted by advertisers in violation of Facebook’s policy. Mr. Sanders has purportedly identified a handful of candidates who were able to circumvent Facebook’s screening process in early 2019 and run ads they knew violated Facebook’s policy. As explained, many of those candidates were more recently announced candidates, and Facebook was not yet aware they were running for office. Once Facebook learned certain candidates were not included in its key word list, it removed the ads and added the candidates to its list of key words. Facebook continues to enhance its screening processes to increase enforcement on the platform.

In alignment with the PDC’s mission, Facebook also remains broadly committed to transparency in political advertising on its platform. Facebook has adopted policies intended to increase transparency and responsible political advertising, including its required authorization process for

those seeking to post political ads on the platform and its creation of the Ad Library.⁷ Indeed, information about the ads at issue here remains accessible to the public in Facebook's Ad Library.

* * *

For these reasons, Facebook requests that the PDC dismiss Mr. Sanders' Complaint. Should the PDC's executive director instead conclude that an investigation is warranted, Facebook requests to be present at any case status review that the PDC conducts. As noted in the PDC's May 1, 2019 letter, such a review would provide an opportunity for Facebook and the PDC to discuss possible practical alternative resolutions to these issues.

Sincerely,

/s/ Craig S. Primis

Craig S. Primis

⁷ See https://www.facebook.com/policies/ads/restricted_content/political; Facebook, *About the Ad Library*, <https://www.facebook.com/business/help/2405092116183307> (last visited May 10, 2019).

Service Facebook
Target 322681581893045
Account Identifier AriHoffmanForSeattleCityCouncil
Account Type Page
Generated 2019-07-16 17:25:24 UTC
Date Range 2019-01-01 00:00:00 UTC to 2019-02-21 23:59:00 UTC
Creator Ari Hoffman (567967096)
Registered thehofffather@gmail.com
Email thehofffather@aol.com
Addresses hoffari@aol.com
 arihoffman@facebook.com

Ad Groups
Id 6131596127209
Start Date 2019-02-11 03:17:19 UTC
End Date 2019-02-13 15:26:43 UTC
Campaign Id 6131596125209
Total Reach 2747
Payment Account **Account Name** Ari Hoffman
Account Id 10150124242212097

Age/Gender Reach Percent
 18-24 female 1%
 18-24 male 3%
 18-24 unknown 0%
 25-34 female 6%
 25-34 male 13%
 25-34 unknown 1%
 35-44 female 10%
 35-44 male 11%
 35-44 unknown 1%
 45-54 female 10%
 45-54 male 11%
 45-54 unknown 0%
 55-64 female 9%
 55-64 male 8%
 55-64 unknown 0%
 65+ female 8%
 65+ male 7%
 65+ unknown 0%

Region Reach Percent Washington 100%

Version

Id 6131596124809
Start Date 2019-02-11 03:17:19 UTC
End Date 2019-02-13 15:26:43 UTC
Impressions 118
Landing Uri http://community.seattletimes.nwsourc.com/archive/?date=19970123&slug=2520302&fbclid=IwAR2_geYhUgN8URIKJGcpgGluBcg2-iAKy2md6mQfmD3HmnlLIQyJr865vzk
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
 Age: 18 - 65+
Text It's SOLUTION SUNDAY!!! The main roads have been cleared but the side streets have turned into skating rinks. On the @1526576884494878:274:The Saul Spady Show on AM 770 KTTH] this week I suggested that we get plows that can attached to

municipal trucks. Other cities do this with much success and we would have vehicles able to plow the hills. A friend of the campaign sent me this fascinating article about why that wasn't done in Seattle and it is because of politics of the @[113291465167:274:Seattle City Council], circa 1997. Check out the article in the @[38472826214:274:The Seattle Times] below. It is time for a change in Seattle politics. Please help out the campaign with a donation to be part of the change at www.hoffmanforseattle.com

Spend 2.48

Version

Photo Id: 43776321:586458565d3887f5dda399608aff8a32
Id 6131681994009

Start Date 2019-02-11 03:17:19 UTC
End Date 2019-02-13 15:26:43 UTC

Impressions 463

Landing Uri http://community.seattletimes.nwsourc.com/archive/?date=19970123&slug=2520302&fbclid=IwAR2_geYhUgN8URIKJcGcpGluBcg2-iAKy2md6mQfmD3HmnLIOyJr865vzk

Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
 Age: 18 - 65+

Text It's SOLUTION SUNDAY!!! The main roads have been cleared but the side streets have turned into skating rinks. On the @[526576884494878:274:The Saul Spady Show on AM 770 KTTH] this week I suggested that we get plows that can attached to municipal trucks. Other cities do this with much success and we would have vehicles able to plow the hills. A friend of the campaign sent me this fascinating article about why that wasn't done in Seattle and it is because of politics of the @[113291465167:274:Seattle City Council], circa 1997. Check out the article in the @[38472826214:274:The Seattle Times] below. It is time for a change in Seattle politics. Please help out the campaign with a donation to be part of the change at www.hoffmanforseattle.com

Spend 8.96

Version

Photo Id: 43776321:586458565d3887f5dda399608aff8a32
Id 6131778600409

Start Date 2019-02-11 03:17:19 UTC
End Date 2019-02-13 15:26:43 UTC

Impressions 3300

Landing Uri http://community.seattletimes.nwsourc.com/archive/?date=19970123&slug=2520302&fbclid=IwAR2_geYhUgN8URIKJcGcpGluBcg2-iA

Ky2md6mQfmD3HmnLIOyJr865vzk

Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
Age: 18 - 65+

Text It's SOLUTION SUNDAY!!! The main roads have been cleared but the side streets have turned into skating rinks. On the @[526576884494878:274:The Saul Spady Show on AM 770 KTTH] this week I suggested that we get plows that can attached to municipal trucks. Other cities do this with much success and we would have vehicles able to plow the hills. A friend of the campaign sent me this fascinating article about why that wasn't done in Seattle and it is because of politics of the @[113291465167:274:Seattle City Council], circa 1997. Check out the article in the @[38472826214:274:The Seattle Times] below. It is time for a change in Seattle politics. Please help out the campaign with a donation to be part of the change at www.hoffmanforseattle.com

Spend 88.56



Version

Photo Id: 43776321:586458565d3887f5dda399608aff8a32
Id 6132009200809
Start Date 2019-02-11 03:17:19 UTC
End Date 2019-02-13 15:26:43 UTC
Impressions 0
Landing Uri http://community.seattletimes.nwsourc.com/archive/?date=19970123&slug=2520302&fbclid=IwAR2_geYhUgN8URIKJCgcpGluBcg2-iAKy2md6mQfmD3HmnLIOyJr865vzk

Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
Age: 18 - 65+

Text It's SOLUTION SUNDAY!!! The main roads have been cleared but the side streets have turned into skating rinks. On the @[526576884494878:274:The Saul Spady Show on AM 770 KTTH] this week I suggested that we get plows that can attached to municipal trucks. Other cities do this with much success and we would have vehicles able to plow the hills. A friend of the campaign sent me this fascinating article about why that wasn't done in Seattle and it is because of politics of the @[113291465167:274:Seattle City Council], circa 1997. Check out the article in the @[38472826214:274:The Seattle Times] below. It is time for a change in Seattle politics. Please help out the campaign with a donation to be part of the change at www.hoffmanforseattle.com

Spend 0.00

Version

Photo Id: 43776321:586458565d3887f5dda399608aff8a32
Id 6133172212809
Start Date 2019-02-11 03:17:19 UTC
End Date 2019-02-13 15:26:43 UTC
Impressions 0
Landing Uri http://community.seattletimes.nwsourc.com/archive/?date=19970123&slug=2520302&fbclid=IwAR2_geYhUgN8URIKJCgcpGluBcg2-iAKy2md6mQfmD3HmnlLIOyJr865vzk
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
Age: 18 - 65+
Text It's SOLUTION SUNDAY!!! The main roads have been cleared but the side streets have turned into skating rinks. On the @[526576884494878:274:The Saul Spady Show on AM 770 KTTH] this week I suggested that we get plows that can attached to municipal trucks. Other cities do this with much success and we would have vehicles able to plow the hills. A friend of the campaign sent me this fascinating article about why that wasn't done in Seattle and it is because of politics of the @[113291465167:274:Seattle City Council], circa 1997. Check out the article in the @[38472826214:274:The Seattle Times] below. It is time for a change in Seattle politics. Please help out the campaign with a donation to be part of the change at www.hoffmanforseattle.com
Spend 0.00

Photo Id: 43776321:586458565d3887f5dda399608aff8a32
Id 6131320165609
Start Date 2019-02-08 05:48:40 UTC
End Date 2019-02-11 05:48:37 UTC
Campaign Id 6131320163209
Total Reach 6697
Payment Account Name Ari Hoffman
Account
Account Id 10150124242212097

Age/Gender 18-24 female 5%
Reach Percent 18-24 male 7%
18-24 unknown 0%
25-34 female 13%
25-34 male 19%
25-34 unknown 0%
35-44 female 13%

35-44 male 13%
 35-44 unknown 0%
 45-54 female 9%
 45-54 male 8%
 45-54 unknown 0%
 55-64 female 4%
 55-64 male 3%
 55-64 unknown 0%
 65+ female 3%
 65+ male 2%
 65+ unknown 0%
Region Reach Washington 100%
Percent
Version

Id 6131320162809
Start Date 2019-02-08 05:48:40 UTC
End Date 2019-02-11 05:48:37 UTC
Impressions 5927
Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>
Ads Targeting Location - Living In: United States: 1333 S Shelton St, Seattle (+2 mi) Washington
 Age: 21 - 65+
Text What better way to end the day than door belling with the crew out in @[135426449821709:274:Beacon Hill, Seattle]. Today I met Jon Ferrari and Nick DeSantos. Both are concerned about the rising costs of living in Seattle. Nick was even pushed out of his rental, which he had hoped to buy, by rising costs. Jon has lived in the same house for 37 years. He is also concerned about the homeless situation and the drug epidemic. It was so great talking with both of you and I am so happy to see I just got an email from you to talk about the issues! www.hoffmanforseattle.com
Spend 69.64



Photo Id: 385430902284779



Photo Id: 385430922284777



Photo Id: 385430938951442



Version **Photo Id:** 385431165618086
Id 6131534770209
Start Date 2019-02-08 05:48:40 UTC
End Date 2019-02-11 05:48:37 UTC
Impressions 2942
Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>
Ads Targeting Location - Living In: United States: Beacon Hill, Seattle (+2 mi)
Age: 21 - 65+
Text What better way to end the day than door belling with the crew out in @[135426449821709:274:Beacon Hill, Seattle]. Today I met Jon Ferrari and Nick DeSantos. Both are concerned about the rising costs of living in Seattle. Nick was even pushed out of his rental, which he had hoped to buy, by rising costs. Jon has lived in the same house for 37 years. He is also concerned about the homeless situation and the drug epidemic. It was so great talking with both of you and I am so happy to see I just got an email from you to talk about the issues! www.hoffmanforseattle.com
Spend 30.36



Photo Id: 385430902284779



Photo Id: 385430922284777



Photo Id: 385430938951442



Version **Photo Id:** 385431165618086
Id 6132508280809
Start Date 2019-02-08 05:48:40 UTC
End Date 2019-02-11 05:48:37 UTC
Impressions 0
Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>
Ads Targeting Location - Living In: United States: Beacon Hill, Seattle (+2 mi)
 Age: 21 - 65+
Text What better way to end the day than door belling with the crew out in @[135426449821709:274:Beacon Hill, Seattle]. Today I met Jon Ferrari and Nick DeSantos. Both are concerned about the rising costs of living in Seattle. Nick was even pushed out of his rental, which he had hoped to buy, by rising costs. Jon has lived in the same house for 37 years. He is also concerned about the homeless situation and the drug epidemic. It was so great talking with both of you and I am so happy to see I just got an email from you to talk about the issues! www.hoffmanforseattle.com
Spend 0.00



Photo Id: 385430902284779



Photo Id: 385430922284777



Photo Id: 385430938951442



Photo Id: 385431165618086

Id 6132163779209
Start Date 2019-02-16 02:32:28 UTC
End Date 2019-02-18 02:32:28 UTC
Campaign Id 6132163777809
Total Reach 4323
Payment Account Name Ari Hoffman
Account
Account Id 10150124242212097

Age/Gender 18-24 female 3%
Reach Percent 18-24 male 5%
18-24 unknown 0%
25-34 female 10%
25-34 male 23%
25-34 unknown 1%
35-44 female 6%
35-44 male 10%
35-44 unknown 0%
45-54 female 7%
45-54 male 11%
45-54 unknown 0%
55-64 female 5%
55-64 male 6%

55-64 unknown 0%
65+ female 6%
65+ male 6%
65+ unknown 0%
Region Reach Washington 100%

Percent

Version

Id 6132163775609

Start Date 2019-02-16 02:32:28 UTC

End Date 2019-02-18 02:32:28 UTC

Impressions 5951

Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>

Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
Age: 18 - 65+

Text DEMOCRACY VOUCHERS: No I am not taking them for my campaign. I do not believe that your hard earned dollars should be taxed to pay for political campaigns. They will be coming in the mail soon and if you are supporting me you have 2 options for your vouchers: A) Shred your vouchers so no one else can use them B) Mail them back and fill them out with my name so no one else can use them. Make sure you take a picture and tag the campaign with whatever you decide to do so we can share it. In the meantime, check out this 150 word summary we worked up for the elections site and share it with as many people as possible. If you would like to donate to the campaign you can do so at www.hoffmanforseattle.com

Spend 130.44



ARI HOFFMAN

FOR SEATTLE CITY COUNCIL 2019

DISTRICT 2

Ari Hoffman is running for City Council, District 2, because the increase in people experiencing homelessness impelled Ari to create a healthier, safer Seattle. Seattle is ready for common sense, compassionate and practical solutions. Ari serves on the board of Jewish cemeteries, where drug dealers and prostitutes broke into private property, desecrated gravestones, and assaulted the groundskeepers. Ari initiated media awareness campaigns, met with City Council members, community members, and the police department. In the process, budget issues, bureaucracy, and flaws in the system were exposed. Ari opposed the Head Tax and, together with grassroots organizations, gathered enough signatures to repeal the referendum. Ari lives and works in District 2, where he and his wife raise their children, and employs people from all over Seattle. As a volunteer, he has spent years running youth programming. Ari serves on boards for multiple non-profits and helped build schools and community infrastructure.

HOFFMANFORSEATTLE.COM

Photo Id: 389519795209223

Version **Id** 6133172213009

Start Date 2019-02-16 02:32:28 UTC

End Date 2019-02-18 02:32:28 UTC

Impressions 0

Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>

Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
Age: 18 - 65+

Text DEMOCRACY VOUCHERS: No I am not taking them for my campaign. I do not believe that your hard earned dollars should be taxed to pay for political campaigns. They will be coming in the mail soon and if you are supporting me you have 2 options for your vouchers: A) Shred your vouchers so no one else can use them B) Mail them back and fill them out with my name so no one else can use them. Make sure you take a picture and tag the campaign with whatever you decide to do so we can share it. In the meantime, check out this 150 word summary we worked up for the elections site and share it with as many people as possible. If you would like to donate to the campaign you can do so at www.hoffmanforseattle.com

Spend 0.00



ARI HOFFMAN

FOR SEATTLE CITY COUNCIL 2019

DISTRICT 2

Ari Hoffman is running for City Council, District 2, because the increase in people experiencing homelessness impelled Ari to create a healthier, safer Seattle. Seattle is ready for common sense, compassionate and practical solutions. Ari serves on the board of Jewish cemeteries, where drug dealers and prostitutes broke into private property, desecrated gravestones, and assaulted the groundskeepers. Ari initiated media awareness campaigns, met with City Council members, community members, and the police department. In the process, budget issues, bureaucracy, and flaws in the system were exposed. Ari opposed the Head Tax and, together with grassroots organizations, gathered enough signatures to repeal the referendum. Ari lives and works in District 2, where he and his wife raise their children, and employs people from all over Seattle. As a volunteer, he has spent years running youth programming. Ari serves on boards for multiple non-profits and helped build schools and community infrastructure.

HOFFMANFORSEATTLE.COM

Photo Id:

389519795209223

Id 6131929853209
Start Date 2019-02-13 23:22:32 UTC
End Date 2019-02-16 23:22:32 UTC
Campaign Id 6131929851809
Total Reach 17833
Payment Account **Account Name** Ari Hoffman
Account Id 10150124242212097

Age/Gender 18-24 female 6%
Reach Percent 18-24 male 4%
 18-24 unknown 0%
 25-34 female 19%
 25-34 male 12%
 25-34 unknown 0%
 35-44 female 16%
 35-44 male 8%
 35-44 unknown 0%
 45-54 female 10%
 45-54 male 6%
 45-54 unknown 0%
 55-64 female 7%
 55-64 male 3%
 55-64 unknown 0%
 65+ female 6%
 65+ male 2%
 65+ unknown 0%
Region Reach Washington 100%

Version

Id 6131929851209
Start Date 2019-02-13 23:22:32 UTC
End Date 2019-02-16 23:22:32 UTC
Impressions 1513
Landing Uri <http://web-extract.constantcontact.com>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
 Age: 18 - 65+
Text Lessons Learned from Snowmageddon/Snowpocalypse 2019
Spend 13.33



Version **Photo Id:** 43776321:68497ac1891ff17efd1447e01c9f0bd4
Id 6132008876009
Start Date 2019-02-13 23:22:32 UTC
End Date 2019-02-16 23:22:32 UTC
Impressions 25921
Landing Uri <http://web-extract.constantcontact.com>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144)
Washington
Age: 18 - 65+
Text Lessons Learned from Snowmageddon/Snowpocalypse 2019
Spend 286.67



Version **Photo Id:** 43776321:68497ac1891ff17efd1447e01c9f0bd4
Id 6133172212409
Start Date 2019-02-13 23:22:32 UTC
End Date 2019-02-16 23:22:32 UTC
Impressions 0
Landing Uri <http://web-extract.constantcontact.com>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
Age: 18 - 65+
Text Lessons Learned from Snowmageddon/Snowpocalypse 2019
Spend 0.00



Photo Id: 43776321:68497ac1891ff17efd1447e01c9f0bd4

Id 6129831252209
Start Date 2019-01-25 04:51:41 UTC
End Date 2019-01-31 04:51:41 UTC
Campaign Id 6129831250409
Total Reach 15528
Payment Account Name Ari Hoffman
Account
Account Id 10150124242212097

Age/Gender 18-24 female 6%
Reach Percent 18-24 male 11%
 18-24 unknown 0%
 25-34 female 11%
 25-34 male 29%
 25-34 unknown 1%
 35-44 female 6%
 35-44 male 14%
 35-44 unknown 0%
 45-54 female 3%
 45-54 male 8%
 45-54 unknown 0%
 55-64 female 2%
 55-64 male 4%

	55-64 unknown 0%
	65+ female 1%
	65+ male 2%
	65+ unknown 0%
Region Reach	Washington 100%
Percent	
Version	Id 6129831249809
	Start Date 2019-01-25 04:51:41 UTC
	End Date 2019-01-31 04:51:41 UTC
	Impressions 0
	Landing Uri https://www.facebook.com/AriHoffmanForSeattleCityCouncil/
Ads Targeting	Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington Age: 18 - 65+
	Text See what your local community leader and City Council Candidate plans to do about the Viaduct #Viadoom #Seattle
	Spend 0.00
Version	Id 6129831264409
	Start Date 2019-01-25 04:51:41 UTC
	End Date 2019-01-31 04:51:41 UTC
	Impressions 0
	Landing Uri https://www.facebook.com/AriHoffmanForSeattleCityCouncil/
Ads Targeting	Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington Age: 18 - 65+
	Text See what your local community leader plans to do about the Viaduct #Viadoom #Seattle
	Spend 0.00
Version	Id 6129831322209
	Start Date 2019-01-25 04:51:41 UTC
	End Date 2019-01-31 04:51:41 UTC
	Impressions 0
	Landing Uri https://www.facebook.com/AriHoffmanForSeattleCityCouncil/
Ads Targeting	Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington Age: 18 - 65+
	Text See what your local community leader plans to do about the Viaduct #Viadoom #Seattle
	Spend 0.00
Version	Id 6129834661009
	Start Date 2019-01-25 04:51:41 UTC
	End Date 2019-01-31 04:51:41 UTC
	Impressions 0
	Landing Uri https://www.facebook.com/AriHoffmanForSeattleCityCouncil/
Ads Targeting	Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington Age: 18 - 65+
	Text See what your local community leader plans to do about the Viaduct #Viadoom #Seattle
	Spend 0.00

Version	Id 6129834662809
	Start Date 2019-01-25 04:51:41 UTC
	End Date 2019-01-31 04:51:41 UTC
	Impressions 29127
	Landing Uri https://www.facebook.com/AriHoffmanForSeattleCityCouncil/
Ads Targeting	Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington Age: 18 - 65+
	Text See what your local community leader plans to do about the Viaduct #Viadoom #Seattle
	Spend 299.99
Version	Id 6131595817809
	Start Date 2019-01-25 04:51:41 UTC
	End Date 2019-01-31 04:51:41 UTC
	Impressions 0
	Landing Uri https://www.facebook.com/AriHoffmanForSeattleCityCouncil/
Ads Targeting	Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington Age: 18 - 65+
	Text See what your local community leader plans to do about the Viaduct #Viadoom #Seattle
	Spend 0.00
Version	Id 6131681994209
	Start Date 2019-01-25 04:51:41 UTC
	End Date 2019-01-31 04:51:41 UTC
	Impressions 0
	Landing Uri https://www.facebook.com/AriHoffmanForSeattleCityCouncil/
Ads Targeting	Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington Age: 18 - 65+
	Text See what your local community leader plans to do about the Viaduct #Viadoom #Seattle
	Spend 0.00
Version	Id 6132009714009
	Start Date 2019-01-25 04:51:41 UTC
	End Date 2019-01-31 04:51:41 UTC
	Impressions 0
	Landing Uri https://www.facebook.com/AriHoffmanForSeattleCityCouncil/
Ads Targeting	Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington Age: 18 - 65+
	Text See what your local community leader plans to do about the Viaduct #Viadoom #Seattle
	Spend 0.00
Version	Id 6133172229409
	Start Date 2019-01-25 04:51:41 UTC
	End Date 2019-01-31 04:51:41 UTC
	Impressions 0
	Landing Uri https://www.facebook.com/AriHoffmanForSeattleCityCouncil/

Ads Targeting

Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
Age: 18 - 65+

Text See what your local community leader plans to do about the Viaduct #Viadoom #Seattle

Spend 0.00

Id 6131595742809
Start Date 2019-02-11 03:10:56 UTC
End Date 2019-02-15 03:10:56 UTC
Campaign Id 6131595741209
Total Reach 8713
Payment Account Name Ari Hoffman
Account
Account Id 10150124242212097

Age/Gender 18-24 female 5%
Reach Percent 18-24 male 12%
18-24 unknown 0%
25-34 female 9%
25-34 male 30%
25-34 unknown 1%
35-44 female 6%
35-44 male 15%
35-44 unknown 0%
45-54 female 3%
45-54 male 8%
45-54 unknown 0%
55-64 female 3%
55-64 male 4%
55-64 unknown 0%
65+ female 2%
65+ male 3%
65+ unknown 0%
Region Reach Washington 100%
Percent
Version

Id 6131595740609
Start Date 2019-02-11 03:10:56 UTC
End Date 2019-02-15 03:10:56 UTC
Impressions 0
Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
Age: 18 - 65+
Text Ari is running for Seattle City Council (District 2) for a safer more prosperous Seattle
Spend 0.00

Version
Id 6131595775009
Start Date 2019-02-11 03:10:56 UTC
End Date 2019-02-15 03:10:56 UTC
Impressions 2856
Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle

(98108), Seattle (98118), Seattle (98134), Seattle (98144)
 Washington
 Age: 18 - 65+

Text Ari is running for Seattle City Council (District 2) for a safer more prosperous Seattle
Spend 27.87

Version

Id 6131681994409
Start Date 2019-02-11 03:10:56 UTC
End Date 2019-02-15 03:10:56 UTC
Impressions 8942
Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144)
 Washington
 Age: 18 - 65+
Text Ari is running for Seattle City Council (District 2) for a safer more prosperous Seattle
Spend 92.37

Version

Id 6132009244609
Start Date 2019-02-11 03:10:56 UTC
End Date 2019-02-15 03:10:56 UTC
Impressions 4401
Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144)
 Washington
 Age: 18 - 65+
Text Ari is running for Seattle City Council (District 2) for a safer more prosperous Seattle
Spend 46.10

Version

Id 6133172229209
Start Date 2019-02-11 03:10:56 UTC
End Date 2019-02-15 03:10:56 UTC
Impressions 0
Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144)
 Washington
 Age: 18 - 65+
Text Ari is running for Seattle City Council (District 2) for a safer more prosperous Seattle
Spend 0.00

Id 6132315843409
Start Date 2019-02-18 06:06:16 UTC
End Date 2019-02-19 06:06:14 UTC
Campaign Id 6132315842409
Total Reach 2409
Payment Account **Account Name** Ari Hoffman
Account Id 10150124242212097

Age/Gender 65+ male 100%
Reach Percent

Region Reach

Percent Washington 100%

Version **Id** 6132315840809

Start Date 2019-02-18 06:06:16 UTC

End Date 2019-02-19 06:06:14 UTC

Impressions 3434

Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>

Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington

Age: 18 - 65+

Text Billions of dollars have been spent on the Homeless Crisis and it has only gotten worse. Billions more are about to be spent on public school funding but why is that money not ending up in the classrooms? Transportation projects are constantly coming in way over budget, sometimes even at double the original price tag. The Seattle City coffers are full but where is the money going? When I get elected, I will order an audit of every city department to find out where your tax dollars are going, for full transparency in our government. What area of Seattle's lack of financial transparency concerns you the most? www.hoffmanforseattle.com

Spend 100.00

Version **Id** 6133172212209

Start Date 2019-02-18 06:06:16 UTC

End Date 2019-02-19 06:06:14 UTC

Impressions 0

Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>

Ads Targeting Location - Living In: United States: Seattle (98144), Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134) Washington

Age: 18 - 65+

Text Billions of dollars have been spent on the Homeless Crisis and it has only gotten worse. Billions more are about to be spent on public school funding but why is that money not ending up in the classrooms? Transportation projects are constantly coming in way over budget, sometimes even at double the original price tag. The Seattle City coffers are full but where is the money going? When I get elected, I will order an audit of every city department to find out where your tax dollars are going, for full transparency in our government. What area of Seattle's lack of financial transparency concerns you the most? www.hoffmanforseattle.com

Spend 0.00

Id 6131594960209

Start Date 2019-02-11 03:01:49 UTC

End Date 2019-02-14 03:01:47 UTC

Campaign Id 6131594958809

Total Reach 6171

Payment Account Name Ari Hoffman

Account

Account Id 10150124242212097

Age/Gender 18-24 female 8%

Reach Percent 18-24 male 7%

25-34 female 18%

25-34 male 17%

25-34 unknown 0%

35-44 female 13%

	35-44 male 10%
	35-44 unknown 0%
	45-54 female 9%
	45-54 male 6%
	45-54 unknown 0%
	55-64 female 5%
	55-64 male 3%
	55-64 unknown 0%
	65+ female 3%
	65+ male 1%
	65+ unknown 0%
Region Reach	Washington 100%
Percent	
Version	
	Id 6131594957609
	Start Date 2019-02-11 03:01:49 UTC
	End Date 2019-02-14 03:01:47 UTC
	Impressions 12448
	Landing Uri https://www.facebook.com/AriHoffmanForSeattleCityCouncil/
Ads Targeting	Location - Living In: United States: Seattle (98118), 6222 Chatham Dr S, Seattle (+2 mi) Washington; Mount Baker Washington, Columbia City Washington, Hillman City Washington
	Age: 21 - 65+
Text	It may be snowing outside but that means people are home for me to meet in Seward Park. I ran into my friend Rob while knocking on doors. Rob is passionate about finding jobs for homeless people in Seattle and found a program in Israel called MATI that he is going to send me info on to see what lessons we can learn for Seattle. Now, I am a little concerned about the fort and snowballs my kids are planning to ambush me with when I get home
Spend	99.85



Photo Id: 387118855449317



Photo Id: 387118868782649



Photo Id:

387118905449312

Id 6132508222009
Start Date 2019-02-19 23:14:44 UTC
End Date 2019-02-22 23:14:40 UTC
Campaign Id 6132508219409
Total Reach 0
Payment Account **Account Name** Ari Hoffman
Account Id 10150124242212097

Age/Gender
Reach Percent
Region Reach
Percent
Version

Id 6132508219009
Start Date 2019-02-19 23:14:44 UTC
End Date 2019-02-22 23:14:40 UTC
Impressions 0
Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>
Ads Targeting Location - Living In: United States: Beacon Hill, Seattle (+2 mi)
 Age: 21 - 65+
Text Our incredible volunteers met a wonderful family while out door
 belling yesterday. While in the @[135426449821709:274:Beacon
 Hill, Seattle] (Lucille and 15th Ave) neighborhood we met the
 Esguerra family. Erwin Esguerra is nurse who lives in the district
 with his family. His biggest concerns in the area are the
 homelessness, housing affordability, and substance abuse. He
 wants to see a Seattle where these problems are effectively
 addressed. That's because he has small children. Erwin is looking
 to the future and knows that one day, they'll face the same
 troubles in our city if something isn't done about these crises. I'm
 glad to have the Esguerra family's support! What are your top 3
 issues that Seattle faces that I should address when I get elected?
www.hoffmanforseattle.com
Spend 0.00



Photo Id: 391862938308242

Id 6131163522609
Start Date 2019-02-06 18:53:04 UTC
End Date 2019-02-08 18:53:04 UTC
Campaign Id 6131163519409
Total Reach 3340
Payment Account Name Ari Hoffman
Account
Account Id 10150124242212097

Age/Gender 18-24 female 15%
Reach Percent 18-24 male 14%
18-24 unknown 0%
25-34 female 15%
25-34 male 18%
25-34 unknown 0%
35-44 female 8%
35-44 male 6%
35-44 unknown 0%
45-54 female 6%
45-54 male 4%
45-54 unknown 0%
55-64 female 4%
55-64 male 2%

55-64 unknown 0%
65+ female 4%
65+ male 3%
65+ unknown 0%

Region Reach Washington 100%

Percent

Version

Id 6131163517609

Start Date 2019-02-06 18:53:04 UTC

End Date 2019-02-08 18:53:04 UTC

Impressions 5139

Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>

Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
Age: 21 - 65+

Text A very Happy New Year to everyone who is celebrating today and throughout the week! My family and I wish you good luck, good fortune and we hope you have a safe, peaceful, and prosperous 2019! (Thank you to @[32969553180:274:Northwest Asian Weekly] and the @[218635504816193:274:Seattle Chinese Post] for all of your help)

Spend 50.00

**WISHING YOU
A HAPPY & PROSPEROUS
NEW YEAR!**



ARI HOFFMAN
FOR SEATTLE CITY COUNCIL 2019
DISTRICT 3

**“For a safer and
more affordable Seattle.”**

HOFFMANFORSEATTLE.COM

Photo Id: 384002155760987



...與大家共同建設一個安全暨可居的西雅圖

金豬獻瑞
富泰祥和



2019年西雅圖市議會第二區域候選人

Ari Hoffman 敬賀

Photo Id: 384002165760986

Id 6128074280209
Start Date 2019-01-08 06:55:57 UTC
End Date 2019-01-11 06:55:57 UTC
Campaign Id 6128074278409
Total Reach 5932
Payment Account Name Ari Hoffman
Account

Account Id 10150124242212097

Age/Gender 18-24 female 4%
Reach Percent 18-24 male 5%
 18-24 unknown 0%
 25-34 female 7%
 25-34 male 14%
 25-34 unknown 1%
 35-44 female 7%
 35-44 male 12%

35-44 unknown 0%
 45-54 female 7%
 45-54 male 11%
 45-54 unknown 0%
 55-64 female 8%
 55-64 male 8%
 55-64 unknown 0%
 65+ female 8%
 65+ male 7%
 65+ unknown 0%
Region Reach Washington 100%
Percent
Version **Id** 6128074277809
Start Date 2019-01-08 06:55:57 UTC
End Date 2019-01-11 06:55:57 UTC
Impressions 144
Landing Uri <https://hoffmanforseattle.com/?fbclid=IwAR2jceyLhuzVcDlvHz Hx8LfraEBC4DY4Q-sGYR3RGQfGTSBSnDzLr0E-gQ>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
 Age: 18 - 65+
Text Common Sense, Practical, Compassionate Solutions for Seattle
Spend 1.09



Version **Photo Id:** 43776321:b68e42b63ab31993a6507d58a5529519
Id 6128078327009
Start Date 2019-01-08 06:55:57 UTC
End Date 2019-01-11 06:55:57 UTC
Impressions 0
Landing Uri <https://hoffmanforseattle.com/?fbclid=IwAR2jceyLhuzVcDlvHz Hx8LfraEBC4DY4Q-sGYR3RGQfGTSBSnDzLr0E-gQ>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
 Age: 18 - 65+
Text Common Sense, Practical, Compassionate Solutions for Seattle
Spend 0.00



Version **Photo Id:** 43776321:b68e42b63ab31993a6507d58a5529519
Id 6128078329809
Start Date 2019-01-08 06:55:57 UTC
End Date 2019-01-11 06:55:57 UTC
Impressions 9596
Landing Uri <https://hoffmanforseattle.com/?fbclid=IwAR2jceyLhuzVcDlvHzHx8LfraEBC4DY4Q-sGYR3RGQfGTSBSnDzLr0E-gQ>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
Age: 18 - 65+
Text Common Sense, Practical, Compassionate Solutions for Seattle
Spend 88.91



Photo Id: 43776321:b68e42b63ab31993a6507d58a5529519

Service Facebook
Target 344509996279602
Account Identifier Hunter4SeattleCityCouncil
Account Type Page
Generated 2019-07-16 17:25:24 UTC
Date Range 2019-01-01 00:00:00 UTC to 2019-02-21 23:59:00 UTC
Creator Connor Addison (1445727326)
Registered connor@goldsmithproduction.com
Email connormiles425@gmail.com
Addresses goulding.miles@facebook.com

Ad Groups
Id 23843211221690164
Start Date 2019-01-26 20:00:53 UTC
End Date Unknown
Campaign Id 23843197973000164
Total Reach 1995
Payment Account Name Ethan Hunter
Account
Account Id 358023631660051

Age/Gender 18-24 female 8%
Reach Percent 18-24 male 37%
 18-24 unknown 0%
 25-34 female 5%
 25-34 male 21%
 25-34 unknown 0%
 35-44 female 3%
 35-44 male 6%
 35-44 unknown 0%
 45-54 female 3%
 45-54 male 5%
 45-54 unknown 0%
 55-64 female 2%
 55-64 male 3%
 65+ female 3%
 65+ male 3%
 65+ unknown 0%

Region Reach Percent Washington 100%
Version

Id 23843211222810164
Start Date 2019-01-26 20:00:53 UTC
End Date Unknown
Impressions 27
Landing Uri <https://hunter4seattlecitycouncil.com/?fbclid=IwAR2Y71VDcfy2xd cZefx4nDUxAB8PgrXCv9axfCfiE5UuDLmt3OxG9Zcx1s>
Ads Targeting Location: United States: Seattle (+25 mi) Washington
 Age: 18 - 65+
Text Address Seattle's homelessness crisis

Create an economy that works for the poor & working class

Address the gender and racial pay-gap

Make college more accessible

Consider donating to my campaign for Seattle City Council!

Spend

0.25



Version

Photo Id: 358023631660051:9341741ba94d7d3740e7fdf0fedc03bc
Id: 23843211285260164
Start Date: 2019-01-26 20:00:53 UTC
End Date: Unknown
Impressions: 2479
Landing Uri: https://hunter4seattlecitycouncil.com/donate?fbclid=IwAR3rMiWcR6Zwt4M-FldCeKNGbbh_MrgeiNZQmbwqvRAC-ByMNP7Yg9FP_4
Ads Targeting: Location: United States: Seattle (+25 mi) Washington
 Age: 18 - 65+
Text: Address Seattle's homelessness crisis
 Create an economy that works for the poor & working class
 Address the gender and racial pay-gap
 Make college more accessible
 Consider donating to my campaign for Seattle City Council!
Spend: 13.69



Version **Photo Id:** 358023631660051:9341741ba94d7d3740e7fdf0fedc03bc
Id 23843362279660164
Start Date 2019-01-26 20:00:53 UTC
End Date Unknown
Impressions 0
Landing Uri <https://hunter4seattlecitycouncil.com/donate?fbclid=IwAR3rMiWcR6Zwt4M-FldCeKNGbbhMrgeiNZQmbwqvRAC-ByMNP7Yg9FP4>
Ads Targeting Location: United States: Seattle (+25 mi) Washington
 Age: 18 - 65+
Text Address Seattle's homelessness crisis
 Create an economy that works for the poor & working class
 Address the gender and racial pay-gap
 Make college more accessible
 Consider donating to my campaign for Seattle City Council!
Spend 0.00



Photo Id: 358023631660051:9341741ba94d7d3740e7fdf0fedc03bc

Id 23843211284130164
Start Date 2019-01-26 20:00:53 UTC
End Date Unknown
Campaign Id 23843197973000164
Total Reach 3338
Payment Account Name Ethan Hunter
Account
Account Id 358023631660051

Age/Gender 18-24 female 7%
Reach Percent 18-24 male 19%
 18-24 unknown 0%
 25-34 female 5%
 25-34 male 16%
 25-34 unknown 1%
 35-44 female 3%
 35-44 male 8%
 35-44 unknown 0%
 45-54 female 6%
 45-54 male 7%
 45-54 unknown 0%
 55-64 female 6%
 55-64 male 7%
 55-64 unknown 0%
 65+ female 7%
 65+ male 6%

65+ unknown 0%

Region Reach Unknown 0%

Percent Washington 100%

Version **Id** 23843211284590164

Start Date 2019-01-26 20:00:53 UTC

End Date Unknown

Impressions 213

Landing Uri <https://hunter4seattlecitycouncil.com/?fbclid=IwAR2Y71VDcfy2xdcZEfx4nDUxAB8PgrXCv9axfCfiE5UuDLmt3OxG9Zcx1s>

Ads Targeting Location: United States: Seattle (+25 mi) Washington
Age: 18 - 65+

Text ☐☐Address Seattle's homelessness crisis

☐☐Create an economy that works for the poor & working class

☐☐Address the gender and racial pay-gap,

☐☐Make college more accessible

Learn more about my campaign and I stand on the issues facing our city.

Spend 2.18



Version **Photo Id:** 358023631660051:9341741ba94d7d3740e7fdf0fedc03bc

Id 23843211380810164

Start Date 2019-01-26 20:00:53 UTC

End Date Unknown

Impressions 3843

Landing Uri

<https://hunter4seattlecitycouncil.com/?fbclid=IwAR2Y71VDcfy2xdCZefx4nDUxAB8PgrXCv9axfCfiE5UuDLmt3OxG9Zcx1s>

Ads Targeting

Location: United States: Seattle (+25 mi) Washington
Age: 18 - 65+

Text

Address Seattle's homelessness crisis

Create an economy that works for the poor & working class

Address the gender and racial pay-gap,

Make college more accessible

Learn more about my campaign and where I stand on the issues facing our city.

Spend 25.18

**Version**

Photo Id: 358023631660051:9341741ba94d7d3740e7fdf0fedc03bc

Id: 23843362279640164

Start Date: 2019-01-26 20:00:53 UTC

End Date: Unknown

Impressions: 0

Landing Uri: <https://hunter4seattlecitycouncil.com/?fbclid=IwAR2Y71VDcfy2xdCZefx4nDUxAB8PgrXCv9axfCfiE5UuDLmt3OxG9Zcx1s>

Ads Targeting

Location: United States: Seattle (+25 mi) Washington
Age: 18 - 65+

Text

Address Seattle's homelessness crisis

Create an economy that works for the poor & working class

Address the gender and racial pay-gap,

Make college more accessible

Learn more about my campaign and where I stand on the issues facing our city.

Spend 0.00



Photo Id: 358023631660051:9341741ba94d7d3740e7fdf0fedc03bc

Id 23843197979670164
Start Date 2019-01-26 20:00:53 UTC
End Date Unknown
Campaign Id 23843197973000164
Total Reach 4735
Payment Account Name Ethan Hunter
Account
Account Id 358023631660051

Age/Gender 18-24 female 8%
Reach Percent 18-24 male 20%
 18-24 unknown 0%
 25-34 female 6%
 25-34 male 16%
 35-44 female 8%
 35-44 male 10%

45-54 female 7%
 45-54 male 7%
 55-64 female 5%
 55-64 male 4%
 55-64 unknown 0%
 65+ female 5%
 65+ male 3%
 65+ unknown 0%

Region Reach Unknown 0%

Percent Washington 100%

Version **Id** 23843197985200164
Start Date 2019-01-26 20:00:53 UTC
End Date Unknown
Impressions 0
Landing Uri <https://hunter4seattlecitycouncil.com/?fbclid=IwAR3MzTrhMbUHmzTn1zcRZhCTYSFY4258gwM2IXmi6usjim-E0gXzj73C60>
Ads Targeting Location: United States: Seattle (+25 mi) Washington
 Age: 18 - 65+
Text I'm passionate about:

- Addressing Seattle's homelessness crisis
- Creating an economy that works for the poor & working class
- Addressing the gender and racial pay-gap,
- Making college more accessible

Spend 0.00



Version
Photo Id: 358023631660051:39ca53a50fdb14c216a61d96ff127470
Id 23843211221240164
Start Date 2019-01-26 20:00:53 UTC
End Date Unknown
Impressions 81
Landing Uri <https://hunter4seattlecitycouncil.com/?fbclid=IwAR2Y71VDcfy2xdcZEfx4nDUxAB8PgrXCv9axfCfiE5UuDLmt3OxG9Zcx1s>
Ads Targeting Location: United States: Seattle (+25 mi) Washington
 Age: 18 - 65+
Text Address Seattle's homelessness crisis
 Create an economy that works for the poor & working class
 Address the gender and racial pay-gap,
 Make college more accessible
 Consider donating to my campaign for Seattle City Council!
Spend 0.68



Version **Photo Id:** 358023631660051:9341741ba94d7d3740e7fdf0fedc03bc
Id 23843211284890164
Start Date 2019-01-26 20:00:53 UTC
End Date Unknown
Impressions 6895
Landing Uri <https://hunter4seattlecitycouncil.com/donate?fbclid=IwAR3rMiWcR6Zwt4M-FldCeKNGbbhMrgeiNZQmbwqvRAC-ByMNP7Yg9FP4>
Ads Targeting Location: United States: Seattle (+25 mi) Washington
Age: 18 - 65+
Text ☐☐Address Seattle's homelessness crisis
☐☐Create an economy that works for the poor & working class
☐☐Address the gender and racial pay-gap,
☐☐Make college more accessible
Consider donating to my campaign for Seattle City Council!
Spend 43.58



Version **Photo Id:** 358023631660051:9341741ba94d7d3740e7fdf0fedc03bc
Id 23843362279650164
Start Date 2019-01-26 20:00:53 UTC
End Date Unknown
Impressions 0
Landing Uri <https://hunter4seattlecitycouncil.com/donate?fbclid=IwAR3rMiWcR6Zwt4M-FldCeKNGbbhMrgeiNZQmbwqvRAC-ByMNP7Yg9FP4>
Ads Targeting Location: United States: Seattle (+25 mi) Washington
 Age: 18 - 65+
Text ☐☐Address Seattle's homelessness crisis
 ☐☐Create an economy that works for the poor & working class
 ☐☐Address the gender and racial pay-gap,
 ☐☐Make college more accessible
 Consider donating to my campaign for Seattle City Council!
Spend 0.00



Photo Id: 358023631660051:9341741ba94d7d3740e7fdf0fedc03bc

Id 23843206150080164
Start Date 2019-02-01 18:31:41 UTC
End Date 2019-02-03 18:31:39 UTC
Campaign Id 23843206149960164
Total Reach 328
Payment Account Name Ethan Hunter
Account
Account Id 358023631660051

Age/Gender 18-24 female 19%
Reach Percent 18-24 male 28%
 18-24 unknown 1%
 25-34 female 10%
 25-34 male 18%
 25-34 unknown 0%
 35-44 female 4%
 35-44 male 7%
 45-54 female 4%
 45-54 male 4%
 55-64 female 0%
 55-64 male 1%
 65+ female 1%
 65+ male 1%
Region Reach Washington 100%
Percent
Version **Id** 23843206149940164

Start Date

2019-02-01 18:31:41 UTC

End Date

2019-02-03 18:31:39 UTC

Impressions

333

Landing Uri<https://www.facebook.com/Hunter4SeattleCityCouncil/>**Ads Targeting**

Location - Living In: United States: Washington

Age: 18 - 65+

Text

Campaign buttons will soon be available! If interested in receiving one, please contact hunter4seattle@gmail.com or DM us for more info.

ALL attendees of the 2/8 kickoff rally will receive a free button, and have the opportunity to win a free t-shirt!

Spend

10.00

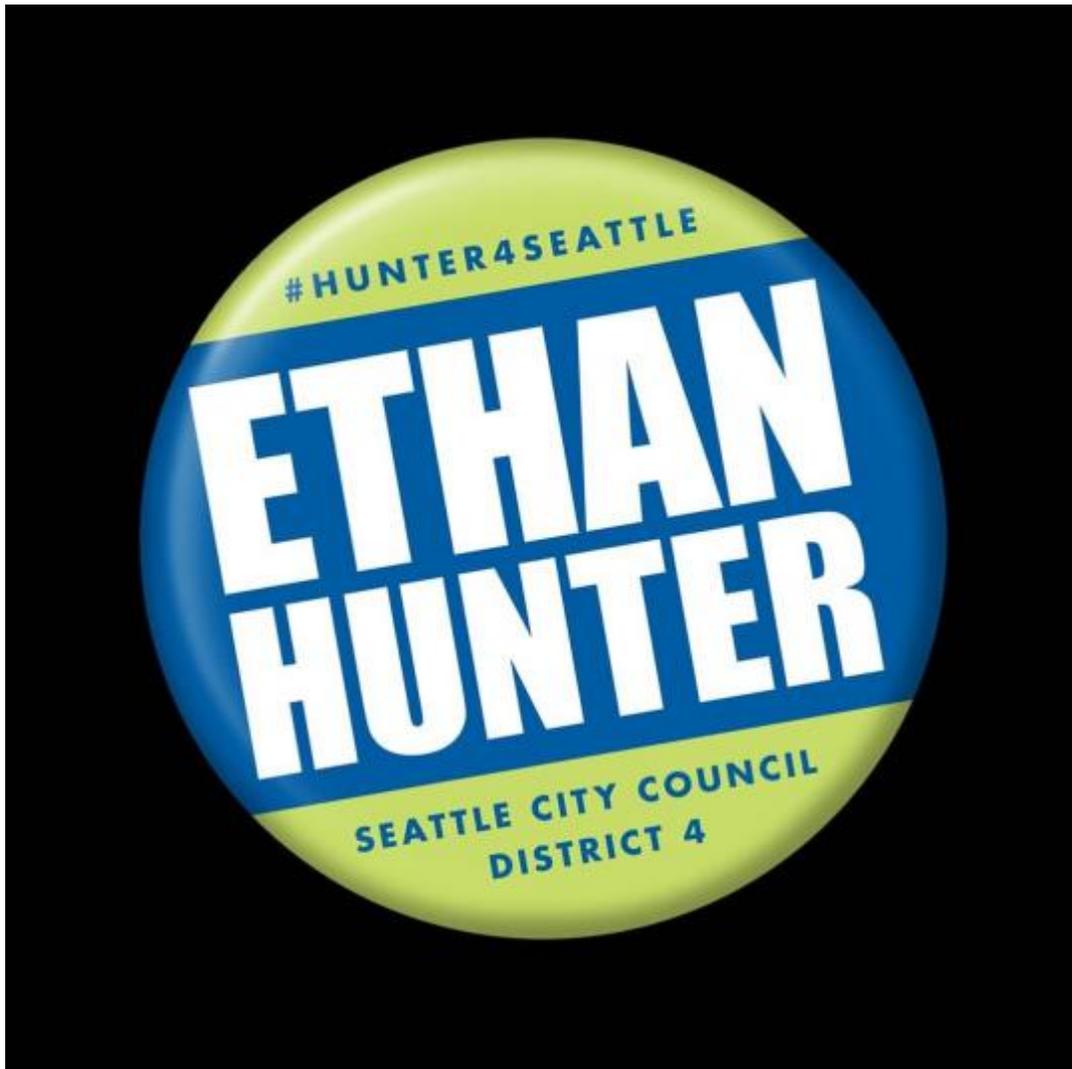


Photo Id:

354284441968824

Id 23843197985470164
Start Date 2019-01-26 19:39:14 UTC
End Date Unknown
Campaign Id 23843197973000164
Total Reach 0
Payment Account Name Ethan Hunter
Account

Account Id 358023631660051

Age/Gender
Reach Percent
Region Reach
Percent
Version

Id 23843197985690164
Start Date 2019-01-26 19:39:14 UTC
End Date Unknown
Impressions 0
Landing Uri <https://hunter4seattlecitycouncil.com/?fbclid=IwAR2Y71VDcfy2xdcZEfx4nDUxAB8PgrXCv9axfCfiE5UuDLmt3OxG9Zcx1s>
Ads Targeting Location: United States: Seattle (98112), Seattle (98115), Seattle (98195), Seattle (98107), Seattle (98105), Seattle (98103), Seattle (98102) Washington
Age: 18 - 65+
Text I'm passionate about:
 Addressing Seattle's homelessness crisis
 Creating an economy that works for the poor & working class
 Addressing the gender and racial pay-gap,
 Making college more accessible
Spend 0.00



Photo Id: 358023631660051:39ca53a50fdb14c216a61d96ff127470

Id 23843197973070164
Start Date 2019-01-26 19:39:14 UTC
End Date Unknown
Campaign Id 23843197973000164
Total Reach 0
Payment Account Name Ethan Hunter
Account Id 358023631660051

Age/Gender
Reach Percent
Region Reach
Percent
Version

Id 23843197974430164
Start Date 2019-01-26 19:39:14 UTC
End Date Unknown
Impressions 0
Landing Uri <https://hunter4seattlecitycouncil.com/issues?fbclid=IwAR0iH5CeJlgdrPo28Fgve-6c0WYrvYDSVClptbSdfULw1xfGINU5IYHIPtE>
Ads Targeting Location: United States: Seattle (98102), Seattle (98103), Seattle (98105), Seattle (98107), Seattle (98112), Seattle (98115), Seattle (98195) Washington
 Age: 18 - 65+
Text I'm running for Seattle City Council in District 4. Learn more about where I stand on the most important issues impacting our city.

Spend
0.00



Photo Id: 358023631660051:720718bf1e2fb8d2c42d0c9d15fedcd

Id 23843197973060164
Start Date 2019-01-26 19:39:14 UTC
End Date Unknown
Campaign Id 23843197973000164
Total Reach 0
Payment Account **Account Name** Ethan Hunter
Account Id 358023631660051

Age/Gender
Reach Percent
Region Reach
Percent
Version

Id 23843197974840164
Start Date 2019-01-26 19:39:14 UTC
End Date Unknown
Impressions 0
Landing Uri <https://hunter4seattlecitycouncil.com/issues?fbclid=IwAR0iH5CejlgdrPo28Fgve-6c0WYrvYDSVCiptbSdfULw1xfGINU5IYHIPtE>
Ads Targeting Location: United States: Seattle (98102), Seattle (98103), Seattle (98105), Seattle (98107), Seattle (98112), Seattle (98115), Seattle (98195) Washington
 Age: 18 - 65+

Text

I'm running for Seattle City Council in District 4. Learn more about where I stand on the most important issues impacting our city.

Spend 0.00



Photo Id: 358023631660051:b069b4466bfe205c69ae75dfb1fb0f79

Id 23843197973080164
Start Date 2019-01-26 19:39:14 UTC
End Date Unknown
Campaign Id 23843197973000164
Total Reach 0
Payment Account Name Ethan Hunter
Account Id 358023631660051

Age/Gender
Reach Percent
Region Reach
Percent
Version

Id 23843197974350164
Start Date 2019-01-26 19:39:14 UTC
End Date Unknown
Impressions 0
Landing Uri <https://hunter4seattlecitycouncil.com/issues?fbclid=IwAR0iH5CeJgdrPo28Fgve-6c0WYrvYDSVCiptbSdfULw1xfGINU5IYHIPtE>
Ads Targeting Location: United States: Seattle (98102), Seattle (98103), Seattle (98105), Seattle (98107), Seattle (98112), Seattle (98115), Seattle

(98195) Washington

Age: 18 - 65+

Text I'm running for Seattle City Council in District 4. Learn more about where I stand on the most important issues impacting our city.

Spend 0.00



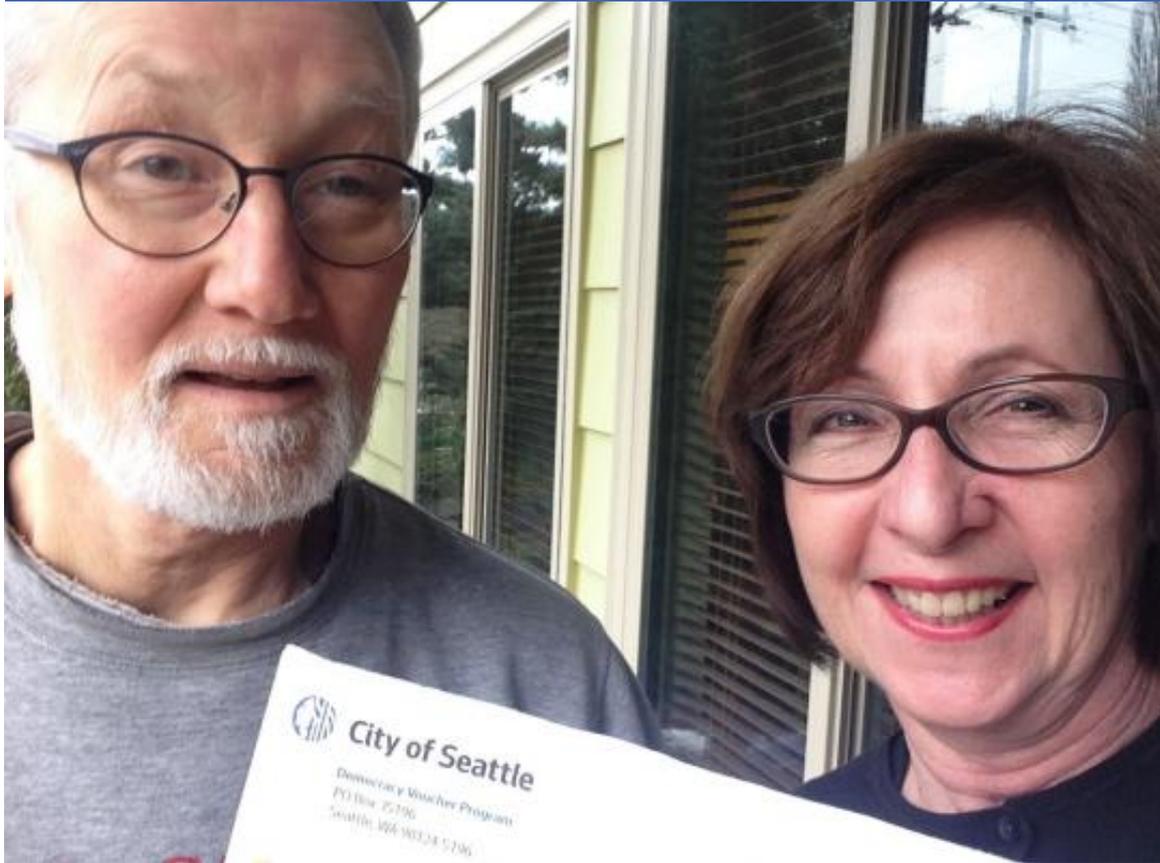
Photo Id: 358023631660051:e3506460b74ff8d200b9eb6cdf39022

Service Facebook
Target 2253311654740578
Account Identifier putkateonthecouncil
Account Type Page
Generated 2019-07-16 17:25:25 UTC
Date Range 2019-01-01 00:00:00 UTC to 2019-02-21 23:59:00 UTC
Creator Kate Martin (1155065780)
Registered katemartin@putkateonthecouncil.org
Email katemartinseattle@facebook.com
Addresses

Ad Groups
Id 6116370466622
Start Date 2019-02-19 04:22:48 UTC
End Date 2019-03-05 04:22:45 UTC
Campaign Id 6116370466022
Total Reach 606
Payment Account **Account Name** Kate Martin
Account Id 1697866403900

Age/Gender 18-24 female 5%
Reach Percent 18-24 male 4%
 18-24 unknown 0%
 25-34 female 6%
 25-34 male 5%
 25-34 unknown 0%
 35-44 female 6%
 35-44 male 6%
 45-54 female 11%
 45-54 male 9%
 45-54 unknown 0%
 55-64 female 14%
 55-64 male 9%
 65+ female 16%
 65+ male 7%
 65+ unknown 1%
Region Reach Washington 100%
Percent

Version
Id 6116370465422
Start Date 2019-02-19 04:22:48 UTC
End Date 2019-03-05 04:22:45 UTC
Impressions 614
Landing Uri <https://www.facebook.com/putkateonthecouncil/>
Ads Targeting Location - Living In: United States: Seattle Washington
 Age: 18 - 65+
Text There was a knock on my door a few moments ago. It was my neighbor, Stan Boone, contributing all of his Democracy Vouchers to my campaign. Those are my first vouchers and it feels really great that they came from someone on my block. "Vouch for Kate" #vouchforkate
Spend 12.48



Version

Photo Id: 2483604148377993
Id: 6116951622422
Start Date: 2019-02-19 04:22:48 UTC
End Date: 2019-03-05 04:22:45 UTC
Impressions: 226
Landing Uri: <https://www.facebook.com/putkateonthecouncil/>
Ads Targeting: Location - Living In: United States: Seattle Washington
 Age: 18 - 65+
Text: There was a knock on my door a few moments ago. It was my neighbor, Stan Boone, contributing all of his Democracy Vouchers to my campaign. Those are my first vouchers and it feels really great that they came from someone on my block. "Vouch for Kate" #vouchforkate
Spend: 7.52

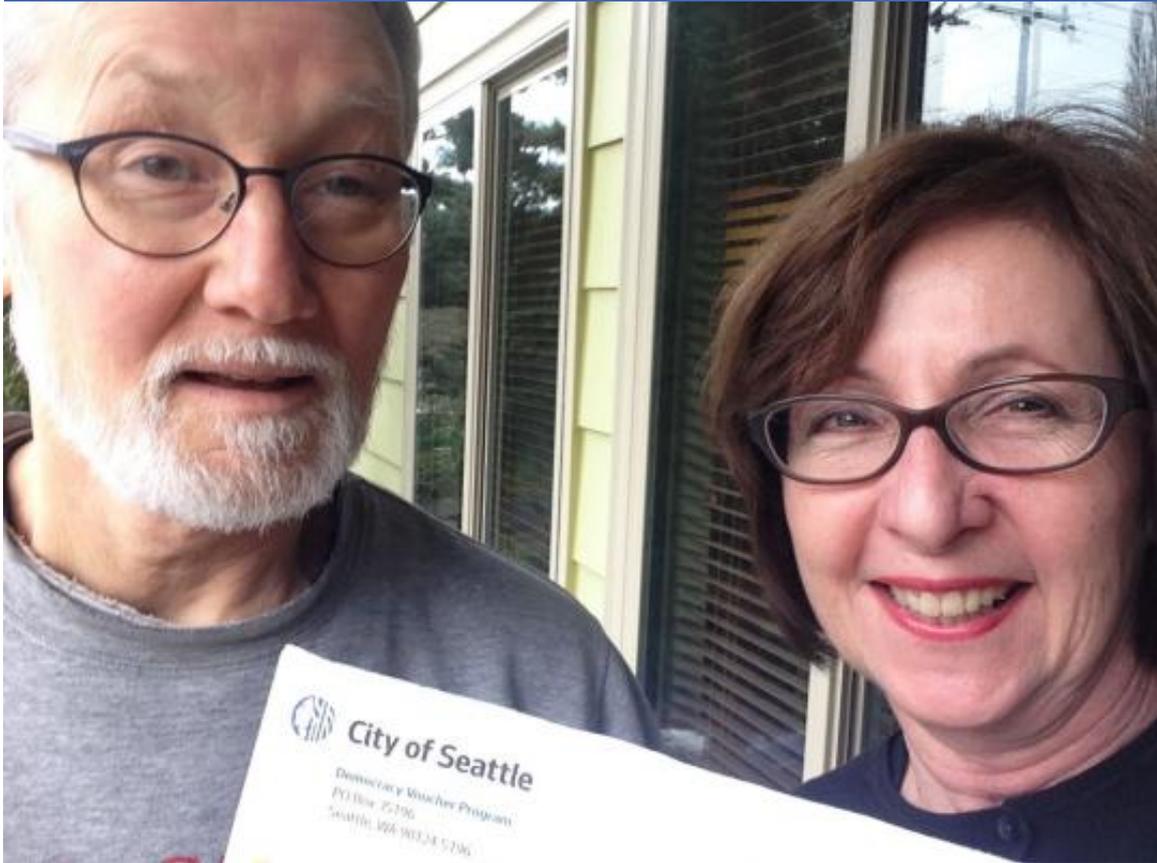


Photo Id: 2483604148377993

Id 6116373324622
Start Date 2019-02-19 05:18:26 UTC
End Date 2019-03-01 05:18:26 UTC
Campaign Id 6116373322422
Total Reach 549
Payment Account **Account Name** Kate Martin
Account Id 1697866403900

Age/Gender 18-24 female 13%
Reach Percent 18-24 male 13%
 18-24 unknown 1%
 25-34 female 14%
 25-34 male 19%
 25-34 unknown 0%
 35-44 female 9%
 35-44 male 7%
 45-54 female 6%
 45-54 male 5%
 55-64 female 4%
 55-64 male 3%
 65+ female 3%
 65+ male 2%

Region Reach**Percent** Washington 100%**Version** **Id** 6116373321822**Start Date** 2019-02-19 05:18:26 UTC**End Date** 2019-03-01 05:18:26 UTC**Impressions** 853**Landing Uri** <https://www.facebook.com/putkateonthecouncil/>**Ads Targeting** Location - Living In: United States: Seattle (98103), Seattle (98117), Seattle (98107), Shoreline (98177) Washington

Age: 18 - 65+

Text Yay!! Vouch for Kate!!!**Spend** 20.00



Photo Id:

2486182844786790

Id 6116236958822
Start Date 2019-02-17 02:51:22 UTC
End Date 2019-03-08 02:51:22 UTC
Campaign Id 6116236956622
Total Reach 866
Payment Account Name Kate Martin
Account
Account Id 1697866403900

Age/Gender 18-24 female 17%
Reach Percent 18-24 male 17%
 18-24 unknown 0%
 25-34 female 8%
 25-34 male 12%
 25-34 unknown 0%
 35-44 female 5%
 35-44 male 5%
 45-54 female 7%
 45-54 male 4%
 55-64 female 6%
 55-64 male 4%
 65+ female 10%
 65+ male 4%
 65+ unknown 0%
Region Reach Washington 100%
Percent
Version

Id 6116236956422
Start Date 2019-02-17 02:51:22 UTC
End Date 2019-03-08 02:51:22 UTC
Impressions 1010
Landing Uri <https://www.facebook.com/putkateonthecouncil/>
Ads Targeting Location - Living In: United States: Seattle Washington
 Age: 18 - 65+
Text There was a knock on my door a few moments ago. It was my neighbor, Stan Boone, contributing all of his Democracy Vouchers to my campaign. Those are my first vouchers and it feels really great that they came from someone on my block. "Vouch for Kate" #vouchforkate
Spend 28.97

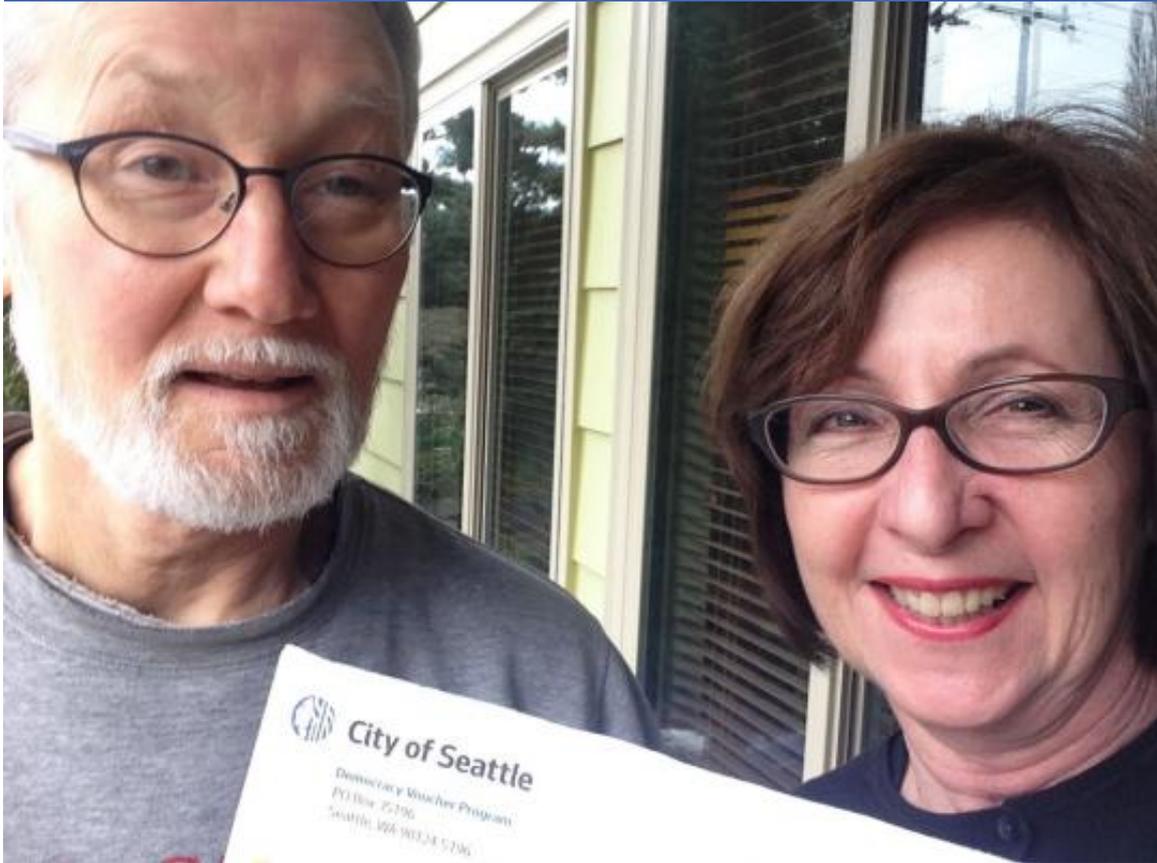


Photo Id: 2483604148377993

Id 6115897844422
Start Date 2019-02-12 17:35:11 UTC
End Date 2019-02-22 17:35:04 UTC
Campaign Id 6115897842822
Total Reach 524
Payment Account **Account Name** Kate Martin
Account **Account Id** 1697866403900

Age/Gender 18-24 female 30%
Reach Percent 18-24 male 8%
 25-34 female 23%
 25-34 male 7%
 35-44 female 5%
 35-44 male 4%
 45-54 female 4%
 45-54 male 4%
 55-64 female 2%
 55-64 male 3%
 65+ female 6%
 65+ male 3%

Region Reach Washington 100%
Percent

Version

Id 6115897841622
Start Date 2019-02-12 17:35:11 UTC
End Date 2019-02-22 17:35:04 UTC
Impressions 1120
Landing Uri https://www.putkateonthecouncil.org/contribute/?fbclid=IwAR0zg2bHOT6mQB6ywdKzVMclp9NWvalnzWwK67iNs9k8Ob8j_sjAbNS7qh4
Ads Targeting Location - Living In: United States: Seattle Washington
 Age: 18 - 65+
Text "Vouch for Kate" Blitz Week! I've received 53 contributions so far, 31 of them from people in my District 6, 8 from my block. Yay! Please help me reach 150 donations this week with a contribution as small as \$10, but no bigger than \$250 so I will be qualified for Democracy Vouchers. Thanks for your support!
<https://www.putkateonthecouncil.org/contribute/>
Spend 20.00



Photo Id: 150926120:95d9c3917b7e6107f1302835aa95e221

Id 6112724409822
Start Date 2018-12-30 23:00:19 UTC
End Date 2019-01-09 23:00:18 UTC
Campaign Id 6112724408422
Total Reach 246
Payment Account Name Kate Martin
Account
Account Id 1697866403900

Age/Gender

Reach Percent

18-24 female 12%
 18-24 male 19%
 18-24 unknown 1%
 25-34 female 7%
 25-34 male 10%
 25-34 unknown 1%
 35-44 female 4%
 35-44 male 8%
 35-44 unknown 1%
 45-54 female 4%
 45-54 male 4%
 55-64 female 5%
 55-64 male 7%
 65+ female 9%
 65+ male 7%

Region Reach Washington 100%**Percent
Version**

Id 6112724407422
Start Date 2018-12-30 23:00:19 UTC
End Date 2019-01-09 23:00:18 UTC
Impressions 301
Landing Uri <https://www.putkateonthecouncil.org/a-sharing-problem-part-1/?fbclid=IwAR3vdkFu8PiLmVtl4ojooqWv-dUqshyZHKnuq9FxpPdF9RjwMwZIEszammk>
Ads Targeting Location - Living In: United States: 412 NW 73rd St, Seattle (+3 mi)
 Washington
 Age: 18 - 65+
Text Do we have a sharing problem?
Spend 10.00



Photo Id: 150926120:2114ad1fc60f2d2ef92895686a3ab76c

Id 6115898558222
Start Date 2019-02-12 17:46:06 UTC
End Date 2019-02-22 17:46:04 UTC
Campaign Id 6115898557422
Total Reach 604
Payment Account Name Kate Martin
Account
Account Id 1697866403900

Age/Gender 18-24 female 37%
Reach Percent 18-24 male 12%
18-24 unknown 0%
25-34 female 20%
25-34 male 9%

	35-44 female 4%
	35-44 male 3%
	45-54 female 3%
	45-54 male 3%
	55-64 female 2%
	55-64 male 2%
	65+ female 4%
	65+ male 2%
	65+ unknown 0%
Region Reach	Washington 100%
Percent	
Version	
	Id 6115898552422
	Start Date 2019-02-12 17:46:06 UTC
	End Date 2019-02-22 17:46:04 UTC
	Impressions 1504
	Landing Uri https://app.campaignhq.com/11PZ31?ref=sh_27bfb2&fbclid=IwAR34MNxEggJo6PUC8wa95ywcpS1k15XRzsvtYvDhE0WHAoz5t2ZtJfFqpo
Ads Targeting	Location - Living In: United States: Seattle Washington Age: 18 - 65+
Text	The "Vouch for Kate" party was fun. I'm almost half way to qualifying for Democracy Vouchers. Since I've already pledged to participate, you can send or give me your vouchers from the minute they arrive around Valentine's Day. The City will start reimbursing me for them as soon as I'm fully qualified. Hint. Hint. I want people to know that I am a neighborhoods and small business candidate. It feels good to be running in the District 6 race where I have deep roots in the community in both of those areas. Makes it kind of harder for the "pundits + tastemakers" to have their own primaries which I'm sure is what Cleve, Toby, and Faye had in mind when they helped us move to District Elections. I'm looking to bake "upward mobility for all" into every single cake because that will solve almost everything. Additionally, everyone should have the right to rise and recover, even when they stumble. It will not be on my watch that we continue to stand by feigning compassion and civil rights while folks rot to death, in anonymity, from bad luck, poverty, mental illness, addiction or whatever else. Please help me finish qualifying for Democracy Vouchers by making a \$10 or bigger contribution today. Thanks so much for your support!. http://fnd.us/11PZ31?ref=sh_27bfb2
Spend	20.00



Photo Id: 150926120:f7dd371f76e317ba38bb29d1436dbd88

Id 6115929552822
Start Date 2019-02-13 02:18:17 UTC
End Date 2019-02-27 02:18:17 UTC
Campaign Id 6115929551222
Total Reach 2056
Payment Account **Account Name** Kate Martin
Account Id 1697866403900

Age/Gender 18-24 female 19%
Reach Percent 18-24 male 22%
 18-24 unknown 1%
 25-34 female 8%
 25-34 male 24%
 25-34 unknown 1%
 35-44 female 4%
 35-44 male 9%
 35-44 unknown 1%
 45-54 female 1%
 45-54 male 4%
 45-54 unknown 0%
 55-64 female 1%
 55-64 male 2%
 55-64 unknown 0%
 65+ female 2%
 65+ male 3%
 65+ unknown 0%

Region Reach Percent Washington 100%

Version **Id** 6115929551022
Start Date 2019-02-13 02:18:17 UTC

End Date 2019-02-27 02:18:17 UTC
Impressions 3311
Landing Uri <https://www.facebook.com/putkateonthecouncil/>
Ads Targeting Location: United States: Latitude 47.68 Longitude -122.36 Seattle (+2 mi) Washington
 Age: 18 - 65+
Text Prepared. Practical. Progressive. KATE MARTIN is in the race to become the next District 6 Seattle City Councilmember.
Spend 7.35



Photo Id: 150926120:4306b19ef6da2d37a74ec44a7ebbadeb

Id 6112900411422
Start Date 2019-01-02 23:15:11 UTC
End Date 2019-01-12 23:15:05 UTC
Campaign Id 6112900408622
Total Reach 237
Payment Account **Account Name** Kate Martin
Account Id 1697866403900
Age/Gender 18-24 female 11%
Reach Percent 18-24 male 13%
 18-24 unknown 1%

25-34 female 9%
 25-34 male 9%
 25-34 unknown 0%
 35-44 female 10%
 35-44 male 6%
 35-44 unknown 0%
 45-54 female 7%
 45-54 male 7%
 45-54 unknown 0%
 55-64 female 5%
 55-64 male 5%
 65+ female 12%
 65+ male 4%

Region Reach Washington 100%

Percent
Version

Id 6112900408222

Start Date 2019-01-02 23:15:11 UTC

End Date 2019-01-12 23:15:05 UTC

Impressions 275

Landing Uri <https://www.putkateonthecouncil.org/room-to-recover/?fbclid=IwAR0Y4CbhY3Uil1PxYYpVC3w87bq1xOCSrLCvzEySgfHhCk-vbzAHOH6Sdel>

Ads Targeting Location - Living In: United States: 412 NW 73rd St, Seattle (+3 mi)
 Washington
 Age: 18 - 65+

Text Seattle could lead the West Coast by redefining our city as one that supports people to recover and reclaim their lives, instead of as a hopeless dead end destination for people on a downward spiral.

Spend 10.00



Photo Id: 150926120:95d9c3917b7e6107f1302835aa95e221

Id 6112905634422
Start Date 2019-01-03 01:09:53 UTC
End Date 2019-01-13 01:09:53 UTC
Campaign Id 6112905632022
Total Reach 965
Payment Account **Account Name** Kate Martin
Account Id 1697866403900

Age/Gender 18-24 female 2%
Reach Percent 18-24 male 2%
 18-24 unknown 0%
 25-34 female 2%
 25-34 male 4%
 35-44 female 2%
 35-44 male 3%
 35-44 unknown 0%
 45-54 female 6%
 45-54 male 9%
 45-54 unknown 1%
 55-64 female 14%
 55-64 male 14%
 55-64 unknown 1%
 65+ female 19%
 65+ male 18%
 65+ unknown 1%

Region Reach

Percent Washington 100%

Version **Id** 6112905630822

Start Date 2019-01-03 01:09:53 UTC

End Date 2019-01-13 01:09:53 UTC

Impressions 0

Landing Uri <https://putkateonthecouncil.us19.list-manage.com/subscribe?u=cb4bb1c8b52d4b5a09444bfac&id=912bce77f5>

Ads Targeting Location - Living In: United States: Seattle Washington
Age: 18 - 65+

Text Prepared. Practical. Progressive. KATE MARTIN is in the race to become the next District 6 Seattle City Councilmember.

Spend 0.00



Version **Photo Id:** 150926120:4306b19ef6da2d37a74ec44a7ebbadeb
Id 6112905650822

Start Date 2019-01-03 01:09:53 UTC

End Date 2019-01-13 01:09:53 UTC

Impressions 0

Landing Uri <https://putkateonthecouncil.us19.list-manage.com/subscribe?u=cb4bb1c8b52d4b5a09444bfac&id=912bce77f5>

Ads Targeting Location - Living In: United States: Seattle Washington
Age: 18 - 65+

Text Prepared. Practical. Progressive. KATE MARTIN is in the race to become the next District 6 Seattle City Councilmember.

Spend

0.00



Version

Photo Id: 150926120:4306b19ef6da2d37a74ec44a7ebbadeb
Id 6112905653422
Start Date 2019-01-03 01:09:53 UTC
End Date 2019-01-13 01:09:53 UTC
Impressions 0
Landing Uri <https://putkateonthecouncil.us19.list-manage.com/subscribe?u=cb4bb1c8b52d4b5a09444bfac&id=912bce77f5>

Ads Targeting Location - Living In: United States: 412 NW 73rd St, Seattle (+3 mi) Washington
 Age: 18 - 65+

Text Prepared. Practical. Progressive. KATE MARTIN is in the race to become the next District 6 Seattle City Councilmember.

Spend 0.00



Version

Photo Id: 150926120:4306b19ef6da2d37a74ec44a7ebbadeb
Id: 6112905657622
Start Date: 2019-01-03 01:09:53 UTC
End Date: 2019-01-13 01:09:53 UTC
Impressions: 1213
Landing Uri: <https://putkateonthecouncil.us19.list-manage.com/subscribe?u=cb4bb1c8b52d4b5a09444bfac&id=912bce77f5>

Ads Targeting Location - Living In: United States: 412 NW 73rd St, Seattle (+3 mi) Washington
Age: 18 - 65+

Text Prepared. Practical. Progressive. KATE MARTIN is in the race to become the next District 6 Seattle City Councilmember.

Spend 9.98



Photo Id: 150926120:4306b19ef6da2d37a74ec44a7ebbadeb

Id 6113765150222
Start Date 2019-01-15 06:44:49 UTC
End Date 2019-01-23 18:35:21 UTC
Campaign Id 6113765148622
Total Reach 616
Payment Account **Account Name** Kate Martin
Account Id 1697866403900

Age/Gender 18-24 female 6%
Reach Percent 18-24 male 8%
 18-24 unknown 1%
 25-34 female 6%
 25-34 male 13%
 25-34 unknown 1%
 35-44 female 9%
 35-44 male 9%
 35-44 unknown 1%
 45-54 female 8%
 45-54 male 7%
 45-54 unknown 1%
 55-64 female 9%
 55-64 male 6%

55-64 unknown 0%
 65+ female 8%
 65+ male 6%
 65+ unknown 0%

Region Reach Washington 100%

Percent Version

Id 6113765147622

Start Date 2019-01-15 06:44:49 UTC

End Date 2019-01-23 18:35:21 UTC

Impressions 666

Landing Uri <https://www.putkateonthecouncil.org/owner-occupied-communities/?fbclid=IwAR3rANm3t1qLeTeqY3jVhHgObYh0mnXHGH-rsnct6SKOd6dGMqvaj2qZrS4>

Ads Targeting Location - Living In: United States: Seattle Washington
 Age: 18 - 65+

Text Owner-occupied communities are the answer, not the enemy.

Spend 18.00



Photo Id: 150926120:95d9c3917b7e6107f1302835aa95e221

Id 6113765096022

Start Date 2019-01-15 06:40:01 UTC

End Date 2019-01-27 06:40:01 UTC

Campaign Id 6113765093622

Total Reach 1472

Payment Account Name Kate Martin

Account Id 1697866403900

Age/Gender

Reach Percent 18-24 female 15%
 18-24 male 6%
 18-24 unknown 0%
 25-34 female 6%
 25-34 male 12%
 25-34 unknown 0%
 35-44 female 4%
 35-44 male 15%
 35-44 unknown 1%
 45-54 female 4%
 45-54 male 13%
 45-54 unknown 0%
 55-64 female 4%
 55-64 male 9%
 55-64 unknown 0%
 65+ female 3%
 65+ male 6%
 65+ unknown 0%

Region Reach Percent Washington 100%

Version

Id 6113765092822

Start Date 2019-01-15 06:40:01 UTC

End Date 2019-01-27 06:40:01 UTC

Impressions 1390

Landing Uri https://www.putkateonthecouncil.org/hala-is-the-new-redlining/?fbclid=IwAR1b0juTfkbTcPxHbMHimEO_tF1I4TIQWml5FDS6woYzBUiXlyNuupNSHJ8

Ads Targeting Location - Living In: United States: 412 NW 73rd St, Seattle (+10 mi) Washington
 Age: 18 - 65+

Text Let's put another one of Ed Murray's whopper lies to rest.

Spend 10.00



Version
Photo Id: 150926120:95d9c3917b7e6107f1302835aa95e221
Id 6114326625622
Start Date 2019-01-15 06:40:01 UTC
End Date 2019-01-27 06:40:01 UTC
Impressions 400
Landing Uri https://www.putkateonthecouncil.org/hala-is-the-new-redlining/?fbclid=IwAR1b0juTfkbTcPxHbMHimEO_tF1I4TIQWmI5FDS6woYzBUiXlyNuupNSHJ8
Ads Targeting Location - Living In: United States: 412 NW 73rd St, Seattle (+10 mi) Washington
 Age: 18 - 65+
Text Let's put another one of Ed Murray's whopper lies to rest.
Spend 4.54



Photo Id: 150926120:95d9c3917b7e6107f1302835aa95e221

Id 6114339655822
Start Date 2019-01-22 21:31:09 UTC
End Date 2019-02-03 04:00:00 UTC
Campaign Id 6114339652822
Total Reach 412
Payment Account **Account Name** Kate Martin
Account Id 1697866403900

Age/Gender 18-24 female 4%
Reach Percent 18-24 male 1%
 18-24 unknown 1%
 25-34 female 15%
 25-34 male 7%
 25-34 unknown 3%
 35-44 female 15%
 35-44 male 7%
 45-54 female 11%
 45-54 male 8%
 45-54 unknown 1%
 55-64 female 7%
 55-64 male 4%
 55-64 unknown 0%
 65+ female 10%
 65+ male 3%
 65+ unknown 0%

Region Reach

Percent

Washington 100%

Version**Id** 6114339652422**Start Date** 2019-01-22 21:31:09 UTC**End Date** 2019-02-03 04:00:00 UTC**Impressions** 570**Landing Uri** <https://www.facebook.com/events/2368925466668700/>**Ads Targeting** Location - Living In: United States: 412 NW 73rd St, Seattle (+3 mi)
Washington

Age: 18 - 65+

Text Please join me for a campaign social open house at my place on Saturday, February 2 (Groundhog Day!) from 4pm - 8pm at 412 NW 73rd St. Children are welcome.

It'll be a good chance to see old friends and make some new ones. I can catch you up on my campaign and you can bend my ear about your priorities. Your presence will encourage me, so I hope you can find a moment to stop by for a drink and a bite to eat. Relax and stay awhile if you can.

My goal for the social is to gather the 150 signatures plus 150 contributions (of any size between \$10 and \$250) that I need to qualify for Democracy Vouchers which will arrive in Seattle voter mailboxes in mid-February. Half of my signatures and contributions must come from voters in District 6, so please come from near and far. Your help making this social successful will make all the difference in my campaign.

If you won't be able to come by, here's the link to the contribution app in case you'd like to contribute online or you could put a check in the mail a check to Put Kate On The Council 412 NW 73rd St Seattle, WA 98117 (As per campaign rules, please identify your employer with an enclosed note or on the memo line of the check.)

Questions or Comments? Please give me a call (206) 579-3703 or send me an email.

Thank you for your support!

Spend 12.00



Photo Id: 150926120:1ab7581861ed2e0cff44c64a670970cf

Id 6115358661222
Start Date 2019-02-05 22:59:42 UTC
End Date 2019-02-15 22:59:38 UTC
Campaign Id 6115358659222
Total Reach 389
Payment Account **Account Name** Kate Martin
Account Id 1697866403900

Age/Gender 18-24 female 1%
Reach Percent 18-24 male 1%
 25-34 female 6%
 25-34 male 5%
 25-34 unknown 1%
 35-44 female 7%
 35-44 male 9%
 35-44 unknown 1%
 45-54 female 13%
 45-54 male 13%
 45-54 unknown 1%
 55-64 female 13%
 55-64 male 9%
 55-64 unknown 1%
 65+ female 11%
 65+ male 8%
 65+ unknown 1%
Region Reach Washington 100%

Percent Version **Id** 6115358658822
Start Date 2019-02-05 22:59:42 UTC
End Date 2019-02-15 22:59:38 UTC

Impressions

708

Landing Uri https://app.campaignhq.com/11PZ31?ref=sh_27bfb2&fbclid=IwAR34MNxEggJo6PUC8wa95ywcpS1k15XRzsvtYvDhE0WHAoz5t2ZtufFqpo**Ads Targeting** Location - Living In: United States: Seattle Washington
Age: 18 - 65+**Text** The "Vouch for Kate" party was fun. I'm almost half way to qualifying for Democracy Vouchers.

Since I've already pledged to participate, you can send or give me your vouchers from the minute they arrive around Valentine's Day. The City will start reimbursing me for them as soon as I'm fully qualified. Hint. Hint.

I want people to know that I am a neighborhoods and small business candidate. It feels good to be running in the District 6 race where I have deep roots in the community in both of those areas. Makes it kind of harder for the "pundits + tastemakers" to have their own primaries which I'm sure is what Cleve, Toby, and Faye had in mind when they helped us move to District Elections.

I'm looking to bake "upward mobility for all" into every single cake because that will solve almost everything. Additionally, everyone should have the right to rise and recover, even when they stumble. It will not be on my watch that we continue to stand by feigning compassion and civil rights while folks rot to death, in anonymity, from bad luck, poverty, mental illness, addiction or whatever else.

Please help me finish qualifying for Democracy Vouchers by making a \$10 or bigger contribution today. Thanks so much for your support!. http://fnd.us/11PZ31?ref=sh_27bfb2

Spend 9.45



Photo Id: 150926120:f7dd371f76e317ba38bb29d1436dbd88

Id 6112671978222
Start Date 2018-12-29 21:08:59 UTC
End Date 2019-01-08 21:08:54 UTC
Campaign Id 6112671976422
Total Reach 0
Payment Account Name Kate Martin
Account Id 1697866403900

Age/Gender
Reach Percent
Region Reach
Percent
Version

Id 6112671976022
Start Date 2018-12-29 21:08:59 UTC
End Date 2019-01-08 21:08:54 UTC
Impressions 0
Landing Uri https://www.putkateonthecouncil.org/room-to-recover/?fbclid=IwAR29vvFNxGC_dfvNOMzLZV0PW4Zw-OKE5xA8SKbYcsXPLnqHwHQUYveR2UU
Ads Targeting Location - Living In: United States: 412 NW 73rd St, Seattle (+3 mi) Washington
 Age: 18 - 65+
Spend 0.00



Photo Id: 150926120:8791ec95b2c1d50654479c554d94a4bf

Id 6112724555822
Start Date 2018-12-30 23:03:58 UTC
End Date 2019-01-09 23:03:56 UTC
Campaign Id 6112724553822
Total Reach 325
Payment Account **Account Name** Kate Martin
Account Id 1697866403900

Age/Gender 18-24 female 2%
Reach Percent 18-24 male 2%
 18-24 unknown 0%
 25-34 female 2%
 25-34 male 3%
 25-34 unknown 0%
 35-44 female 7%
 35-44 male 3%
 35-44 unknown 1%
 45-54 female 14%
 45-54 male 8%
 45-54 unknown 1%
 55-64 female 17%
 55-64 male 11%
 55-64 unknown 1%
 65+ female 19%
 65+ male 7%
 65+ unknown 2%

Region Reach
Percent Washington 100%
Version **Id** 6112724553622
Start Date 2018-12-30 23:03:58 UTC
End Date 2019-01-09 23:03:56 UTC
Impressions 363
Landing Uri <https://www.putkateonthecouncil.org/room-to-recover/?fbclid=IwAR0Y4CbhY3Uii1PxYYpVC3w87bq1xOCSrLCvzEySgfHhCk-vbzAHOH6Sdel>
Ads Targeting Location - Living In: United States: 412 NW 73rd St, Seattle (+3 mi)
 Washington
 Age: 18 - 65+
Spend 2.95



Photo Id: 150926120:8791ec95b2c1d50654479c554d94a4bf

Id 6112672026022
Start Date 2018-12-29 21:12:27 UTC
End Date 2019-01-08 21:12:26 UTC
Campaign Id 6112672025022
Total Reach 0
Payment Account **Account Name** Kate Martin
Account Id 1697866403900
Age/Gender
Reach Percent
Region Reach
Percent

Version

Id 6112672024422
Start Date 2018-12-29 21:12:27 UTC
End Date 2019-01-08 21:12:26 UTC
Impressions 0
Landing Uri <https://www.putkateonthecouncil.org/a-sharing-problem-part-1/?fbclid=IwAR3vdkFu8PiLmVtI4ojoqWv-dUqshyZHKnuq9FxPdF9RjwMwZIEszammk>
Ads Targeting Location - Living In: United States: 412 NW 73rd St, Seattle (+3 mi)
Washington
Age: 18 - 65+
Text Do we have a sharing problem?
Spend 0.00



Photo Id: 150926120:2114ad1fc60f2d2ef92895686a3ab76c

Service Facebook
Target 514409202393399
Account Identifier loganforseattle
Account Type Page
Generated 2019-07-16 17:25:24 UTC
Date Range 2019-01-01 00:00:00 UTC to 2019-02-21 23:59:00 UTC
Creator Logan Bowers (536856944)

Registered logan@datacurrent.com
Email loganbowers@facebook.com
Addresses

Ad Groups

Id	6116234717133
Start Date	2019-01-25 21:33:14 UTC
End Date	2019-02-04 21:33:13 UTC
Campaign Id	6116234714733
Total Reach	1144
Payment Account	Account Name Logan Bowers
	Account Id 10150116974201945

Age/Gender 25-34 female 6%
Reach Percent 25-34 male 14%
 25-34 unknown 1%
 35-44 female 7%
 35-44 male 14%
 35-44 unknown 1%
 45-54 female 8%
 45-54 male 14%
 45-54 unknown 1%
 55-64 female 6%
 55-64 male 12%
 65+ female 6%
 65+ male 10%
 65+ unknown 0%
Region Reach Washington 100%

Version

Id	6116234713933
Start Date	2019-01-25 21:33:14 UTC
End Date	2019-02-04 21:33:13 UTC
Impressions	120
Landing Uri	https://www.facebook.com/loganforseattle/
Ads Targeting	Location - Living In: United States: Latitude 47.62 Longitude -122.30 Seattle (+1.50 mi) Washington Age: 30 - 65+
Text	Hi,

I'm Logan Bowers, an engineer, small business owner, and lifetime resident of Seattle. I'm running to represent District 3 on the Seattle City Council because we need someone who will listen to the district and tackle the tough problems our growing city faces: unaffordability and displacement, transportation gridlock, soaring homelessness, and the looming threat of irreversible climate change.

Learn more at votelogan.org

Spend 1.94



Version **Photo Id:** 541414516359534
Id 6116287003533
Start Date 2019-01-25 21:33:14 UTC
End Date 2019-02-04 21:33:13 UTC
Impressions 1302
Landing Uri <https://www.facebook.com/loganforseattle/>
Ads Targeting Location: United States: Latitude 47.62 Longitude -122.29 Seattle
(+2 mi) Washington
Age: 30 - 65+
Text Hi,

I'm Logan Bowers, an engineer, small business owner, and lifetime resident of Seattle. I'm running to represent District 3 on the Seattle City Council because we need someone who will listen to the district and tackle the tough problems our growing city faces: unaffordability and displacement, transportation gridlock, soaring homelessness, and the looming threat of irreversible climate

change.

Learn more at votelogan.org

Spend 18.06



Photo Id: 541414516359534

Id 6116173523933
Start Date 2019-01-25 03:36:27 UTC
End Date 2019-02-09 03:38:30 UTC
Campaign Id 6116173521133
Total Reach 0
Payment Account **Account Name** Logan Bowers
Account Id 10150116974201945
Age/Gender

Reach Percent
Region Reach
Percent
Version

Id 6116173520733
Start Date 2019-01-25 03:36:27 UTC
End Date 2019-02-09 03:38:30 UTC
Impressions 0
Landing Uri <https://www.facebook.com/loganforseattle/>
Ads Targeting Location - Living In: United States: Washington
Age: 18 - 65+

Text I'm at the East Precinct Police Advisory Council meeting.

Crime in general is down, but gun violence is way up in our neighborhoods. SPD is encouraging everyone to make sure they're reporting crimes they observe, but it's clear understaffing is a limiting their response.

We used to have a Community Service Officer program to work with the community and build trust, it was cut from the budget. It's time we reinvest in CSOs so we can root out violence in our community using nonviolent methods.

Spend 0.00



Version **Photo Id:** 541613803006272
Id 6116173562933

Start Date 2019-01-25 03:36:27 UTC
End Date 2019-02-09 03:38:30 UTC
Impressions 0
Landing Uri <https://www.facebook.com/loganforseattle/>
Ads Targeting Location: United States: Latitude 47.62 Longitude -122.30 Seattle (+1.50 mi) Washington
Age: 30 - 65+
Text I'm at the East Precinct Police Advisory Council meeting.

Crime in general is down, but gun violence is way up in our neighborhoods. SPD is encouraging everyone to make sure they're reporting crimes they observe, but it's clear understaffing is a limiting their response.

We used to have a Community Service Officer program to work with the community and build trust, it was cut from the budget. It's time we reinvest in CSOs so we can root out violence in our community using nonviolent methods.
Spend 0.00



Version **Photo Id:** 541613803006272
Id 6116173565533
Start Date 2019-01-25 03:36:27 UTC
End Date 2019-02-09 03:38:30 UTC

Impressions

0

Landing Uri <https://www.facebook.com/loganforseattle/>**Ads Targeting** Location: United States: Latitude 47.62 Longitude -122.30 Seattle (+1.50 mi) Washington
Age: 30 - 65+**Text** I'm at the East Precinct Police Advisory Council meeting.

Crime in general is down, but gun violence is way up in our neighborhoods. SPD is encouraging everyone to make sure they're reporting crimes they observe, but it's clear understaffing is a limiting their response.

We used to have a Community Service Officer program to work with the community and build trust, it was cut from the budget. It's time we reinvest in CSOs so we can root out violence in our community using nonviolent methods.

Spend 0.00**Photo Id:** 541613803006272

Service Facebook
Target 534188206740996
Account Identifier scptsa
Account Type Page
Generated 2019-07-16 17:25:24 UTC
Date Range 2019-01-01 00:00:00 UTC to 2019-02-21 23:59:00 UTC
Creator Karen Andrade (1247341306)
Registered Email Addresses karenshelver@gmail.com
karenshelver@facebook.com

Ad Groups
Id 6114063346529
Start Date 2019-02-09 19:08:09 UTC
End Date 2019-02-11 18:29:32 UTC
Campaign Id 6114063343929
Total Reach 1263
Payment Account Name Chandra Hampson
Account Id 10202296971559319

Age/Gender 18-24 female 7%
Reach Percent 18-24 male 4%
18-24 unknown 0%
25-34 female 7%
25-34 male 7%
25-34 unknown 1%
35-44 female 11%
35-44 male 6%
35-44 unknown 0%
45-54 female 8%
45-54 male 5%
45-54 unknown 0%
55-64 female 9%
55-64 male 6%
55-64 unknown 0%
65+ female 18%
65+ male 9%
65+ unknown 1%
Region Reach Percent Washington 100%

Version
Id 6114063343329
Start Date 2019-02-09 19:08:09 UTC
End Date 2019-02-11 18:29:32 UTC
Impressions 1538
Landing Uri https://www.scptsa.org/news/2019/1/18/vote-yes-on-the-seattle-school-districts-capital-and-operations-levies?fbclid=IwAR2E-GJ6fjiLriglICTHqWOizceOlqM8i1stqn6IBv_bxmQOhZbnWEJqT-8
Ads Targeting Location - Living In: United States: Seattle Washington
Age: 18 - 65+
Text Have you turned in your ballot yet? Do you have questions about the School Levies Propositions 1 & 2? We did! Our General Membership did!

As such, we spent some some researching and asking hard questions that ultimately led us to our endorsement. We summarize and acknowledge the difficult issues raised by ongoing

local levy dependence for basic education. Please take a look.

Hopefully, this will help you come to the same conclusion we did: we must approve Props 1 & 2.

Our schools rely heavily on these REPLACEMENT levies--that's right, they're renewals, not new taxes. In Seattle, we already have both the operations and capital levies in place and this allows our district to continue to access critical school funding by the same mechanism.

School Levies are significantly different than the City Families, Education and Preschool Promise Levy (FEPPL) approved this past November. FEPPL dollars go to the City of Seattle for purposes outside of k-12 basic education (preschool, community college supports for example).

By contrast, these two School District levies fill major gaps left by limited state funding (yes, even post-McCleary) for basic education and capital (buildings and equipment) needs.

Still have questions? Feel free to post them here and we'll do our best to answer or provide additional resources.

Spend 18.00



Photo Id:

10202296971559319:ddb88ed24f46d06c349d11dcb42198a2

Id 6112529615729
Start Date 2019-01-23 17:53:56 UTC
End Date 2019-01-25 17:56:38 UTC
Campaign Id 6112529612929
Total Reach 0
Payment Account Name Chandra Hampson
Account

Account Id 10202296971559319

Age/Gender
Reach Percent
Region Reach
Percent
Version

Id 6112529612729
Start Date 2019-01-23 17:53:56 UTC
End Date 2019-01-25 17:56:38 UTC
Impressions 0
Landing Uri <https://www.facebook.com/events/2246322832091773/>
Ads Targeting Location - Living In: United States: Washington
 Age: 18 - 65+
Text As a follow up to our fall event on the Superintendent Listening and Learning Tour, "Centering the voices of ethnic families in north Seattle," we have the opportunity to host a strategic plan meeting this week. Our focus is on those communities that took part in our session at the Lake City Community Center, but all are welcome.
Spend 0.00



TUE., JAN. 22 | 5:30-7 PM
 New Holly Gathering Hall
 Co-hosted by Somali
 Moms/Horn of Africa

FRI., JAN. 25 | 4:30-6 PM
 Seattle Mennonite Church
 Co-hosted by Seattle Council
 PTSA

MON., JAN. 28 | 5-6:30 PM
 Graham Hill Elementary
 Native American community-
 focused meeting



Version **Photo Id:** 10202296971559319:c6516dd8338ff69331934ca7bb8979ae
Id 6112529710529
Start Date 2019-01-23 17:53:56 UTC
End Date 2019-01-25 17:56:38 UTC
Impressions 0

Landing Uri

<https://www.facebook.com/events/2246322832091773/>

Ads Targeting

Location - Living In: United States: Washington
Age: 18 - 65+

Text

As a follow up to our fall event on the Superintendent Listening and Learning Tour, "Centering the voices of ethnic families in north Seattle," we have the opportunity to host a strategic plan meeting this week. Our focus is on those communities that took part in our session at the Lake City Community Center, but all are welcome.

Spend 0.00



TUE., JAN. 22 | 5:30-7 PM
New Holly Gathering Hall
Co-hosted by Somali
Moms/Horn of Africa

FRI., JAN. 25 | 4:30-6 PM
Seattle Mennonite Church
Co-hosted by Seattle Council
PTSA

MON., JAN. 28 | 5-6:30 PM
Graham Hill Elementary
Native American community-
focused meeting



Version

Photo Id: 10202296971559319:c6516dd8338ff69331934ca7bb8979ae
Id 6112529741729

Start Date 2019-01-23 17:53:56 UTC

End Date 2019-01-25 17:56:38 UTC

Impressions 0

Landing Uri <https://www.facebook.com/events/2246322832091773/>

Ads Targeting

Location - Living In: United States: Seattle Washington
Age: 18 - 65+

Text

As a follow up to our fall event on the Superintendent Listening and Learning Tour, "Centering the voices of ethnic families in north Seattle," we have the opportunity to host a strategic plan meeting this week. Our focus is on those communities that took part in our session at the Lake City Community Center, but all are welcome.

Spend 0.00



Refining and Strengthening the **STRATEGIC PLAN**

TUE., JAN. 22 | 5:30-7 PM
New Holly Gathering Hall
Co-hosted by Somali
Moms/Horn of Africa

FRI., JAN. 25 | 4:30-6 PM
Seattle Mennonite Church
Co-hosted by Seattle Council
PTSA

MON., JAN. 28 | 5-6:30 PM
Graham Hill Elementary
Native American community-
focused meeting



Updated to reflect sessions upcoming!
Check the Strategic Plan webpage on our website for more information.

Photo Id: 10202296971559319:c6516dd8338ff69331934ca7bb8979ae

Facebook Ad Archive Business Record Chart
September 24, 2019

Statute or Rule Citation	Requirement	In Facebook Ad Archive?	In Facebook Law Enforcement Portal Production on PDC Case 47572?
RCW 42.17A.345(1)(a)	Names of Sponsors of Political Advertising or Electioneering Communications	Only if Sponsor Name is the Same as the Name of the Account Where the Advertising/Communication Appeared	Only if Sponsor Name is the Same as the Name of the Account Where the Advertising/Communication Appeared, or the Account Who Created the Advertising/Communication
RCW 42.17A.345(1)(a)	Addresses of Sponsors of Political Advertising or Electioneering Communications	Partially - Can be voluntarily provided by the advertising sponsor.	Email Address
RCW 42.17A.345(1)(b)	Exact Nature and Extent of Services	Partially	Partially
RCW 42.17A.345(1)(c)	Total Cost of Service	Expressed in Ranges	Yes
RCW 42.17A.345(1)(c)	Manner of Payment for Service	No	No
WAC 390-18-050(5)(a)	Name of Candidate or Ballot Measure Supported or Opposed	No	No
WAC 390-18-050(5)(a)	Whether the Advertising or Communication Supports or Opposes the Candidate or Ballot Measure	No	No
WAC 390-18-050(5)(b)	Names of Sponsoring Person/Persons Actually Paying for the Advertising/Communication	Only if Sponsor Name is the Same as the Name of the Account Where the Advertising/Communication Appeared	Only if Sponsor Name is the Same as the Name of the Account Where the Advertising/Communication Appeared, or the Account Who Created the Advertising/Communication
WAC 390-18-050(5)(b)	Addresses of Sponsoring Person/Persons Actually Paying for the Advertising/Communication	Partially - Can be voluntarily provided by the advertising sponsor.	No
WAC 390-18-050(5)(b)	Federal Employee Identification Number, or Other Variable Identification, If Any, of an Entity	Partially - Can be voluntarily provided by the advertising sponsor.	No
WAC 390-18-050(5)(c)	Total Cost of the Advertising/Electioneering Communication	Expressed in Ranges	Yes
WAC 390-18-050(5)(c)	Initial Cost Estimate if the Total Cost is Not Available Upon Initial Distribution or Broadcast	No	No
WAC 390-18-050(5)(c)	Amount of Total Cost Already Paid	No	No
WAC 390-18-050(5)(c)	Name of Persons Making Payments Toward Total Cost	No	No
WAC 390-18-050(5)(c)	Dates of Payments Toward Total Cost	No	No
WAC 390-18-050(5)(c)	Manner of Payments Toward Total Cost	No	No
WAC 390-18-050(5)(c)	Dates the Commercial Advertiser Rendered Service	Yes	Yes
WAC 390-18-050(6)	A Copy of the Advertising or Communication Itself	Yes	Yes
WAC 390-18-050(6)(g)	Description of Demographic Information (e.g. Age, Gender, Race, Location, etc.) of the Audiences Targeted	No	Age, Gender, Location
WAC 390-18-050(6)(g)	Description of Demographic Information (e.g. Age, Gender, Race, Location, etc.) of the Audiences Reached	Age, Gender, Location	Age, Gender, Location
WAC 390-18-050(6)(g)	Total Number of Impressions Generated by the Advertisement of Communication	Expressed in Ranges	Yes

PDC Staff Review of Facebook Advertising System Information Gathered and Disclosed

Navigational Bookmarks

Summary Information

1. [Facebook Ad Archive Information Disclosed](#)
2. [Facebook Ad Archive Information Missing](#)
3. [Undisclosed Information Provided When Placing Order](#)
4. [Undisclosed Information Provided on Billing Statement and Ad Performance Dashboard \(updated daily\)](#)

Detailed Information with Screenshots

1. [Facebook Ad Archive Information Detailed](#)
2. [Facebook Ad Order Placement Information Detailed](#)
3. [Facebook Billing Statement and Ad Performance Dashboard \(updated daily\) Information Detailed](#)

Facebook Ad Archive Information Disclosed

- Name of sponsoring person. RCW 42.17A.345(1)(a).
- Cost of individual ads in a range. RCW 42.17A.345(1)(c).
- Cost of aggregate ads for a page with exact dollar amount. RCW 42.17A.345(1)(c).
- Dates that Facebook rendered service and ads were presented to the public. WAC 390-050(5)(d).
- A copy of the advertising or communication itself. WAC 390-18-050(6).
- Demographics of audience reached by advertising. WAC 390-18-050(6)(g).

Facebook Ad Archive Information Missing

- Address of sponsoring person. RCW 42.17A.345(1)(a), WAC 390-18-050(5)(b).
 - Provided by sponsoring person (customer) to Facebook through order placement process.
 - Confirmed by Facebook through ad verification process.
- Exact nature and extent of services rendered. RCW 42.17A.345(1)(b), WAC 390-18-050(6)(g).
 - Provided to customer by Facebook through order placement process.
- Total cost of individual ads. RCW 42.17A.345(1)(c), WAC 390-18-050(5)(c).
 - Budget and campaign objective set through order placement process.
 - Budget and performance updated daily for customer.
 - Exact number of impressions, clicks, and engagements given on billing statement and ad performance dashboard, updated daily and made available to customer.
 - Cost per click, impression, or engagement given on billing statement and ad performance dashboard, updated daily and made available to customer.
- Manner of payment for advertising. RCW 42.17A.345(1)(c), WAC 390-18-050(5)(c).
 - Provided through order placement process, and made available to customer.
- Name of the candidate or ballot proposition in advertising. WAC 390-18-050(5)(a).
 - Information not provided in order placement process.
 - Information not provided on billing statement or ad performance dashboard.
- Whether the ad supported or opposed the candidate or ballot proposition. WAC 390-18-050(5)(a).
 - Information not provided in order placement process.
 - Information not provided on billing statement or ad performance dashboard.
- Name and address of person or entity actually paying for the advertising, with verifiable identification such as EIN. RCW 42.17A.345(1)(a), WAC 390-18-050(5)(b).
 - Provided through order placement process.
 - Confirmed through ad verification process.
- Total cost of advertising, who paid, how much is left, who made payments, when payments were made, and the manner of payment. RCW 42.17A.345(1)(c), WAC 390-18-050(5)(c).
 - Provided through order placement process.
 - Exact number of impressions, clicks, and engagements given on billing statement and ad performance dashboard, updated daily and made available for customer.

- Cost per click, impression, or engagement given on billing statement and ad performance dashboard, updated daily and made available for customer.
- Demographics of targeted audiences and total number of impressions. RCW 42.17A.345(1)(b), WAC 390-18-050(6)(g).
 - Provided through order placement process.
 - Optional automatic audience placement service offered by Facebook and not provided by the sponsor.
 - Exact number of impressions, clicks, and engagements given on billing statement and ad performance dashboard, updated daily and made available for customer.
 - Demographics of targeted audience provided in order placement process and reprinted on billing statement and ad performance dashboard, updated daily and made available for customer.

Undisclosed Information Provided When Placing Order

- Name, U.S. mailing address, phone number, verifiable identification number such as EIN or State ID number, and email address associated with Facebook account or gathered through the political advertising verification process. RCW 42.17A.345(1)(a), WAC 390-18-050(5)(b).
- Audiences targeted by the advertising sponsor. RCW 42.17A.345(1)(b) and WAC 390-18-050(6)(g).
- Automated targeting criteria used by Facebook to generate more impressions and clicks. (recommended, but optional service). RCW 42.17A.345(1)(b), WAC 390-18-050(6)(g).
- Exact cost of advertising, updated daily. RCW 42.17A.345(1)(c), WAC 390-18-050(5)(c).
- Exact number of clicks and impressions generated by the advertising, the exact number of people who have seen the advertising and the cost per click or cost of the advertising. RCW 42.17A.345(1)(c), WAC 390-18-050(5)(c), WAC 390-18-050(6)(g).
- Budget set by campaign, with estimated costs for extensions and associated number of additional people, impressions, or clicks. RCW 42.17A.345(1)(c), WAC 390-18-050(5)(c).

Undisclosed Information Provided on Billing Statement and Ad Performance Dashboard (updated daily)

- Total number of people reached, engagements (comment, share, etc.), and clicks with exact cost of advertising by the each, for each individual ad, and aggregate for a page. RCW 42.17A.345(1)(b), RCW 42.17A.345(1)(c), WAC 390-18-050(5)(c).
- Total amount budgeted for the advertising, with objective of advertising (impressions, clicks, website visits, etc.) and total amount billed or spent on the advertising with location and age audience targeting demographics. RCW 42.17A.345(1)(c), WAC 390-18-050(5)(c), WAC 390-18-050(6)(g).

- Address of the sponsor if political advertising (voluntarily provided) and geographic location of audiences reached. RCW 42.17A.345(1)(a), WAC 390-18-050(5)(b), WAC 390-18-050(6)(g).

Ad Archive Information Detailed

- The names and addresses of persons from whom Facebook accepted political advertising or electioneering communications. RCW 42.17A.345(1)(a).
 - Name is provided, address is not provided to the public.

The screenshot displays the Facebook Ad Library interface for an ad by Ari Hoffman. The ad is inactive and was taken down for violating Facebook's advertising policies. The ad's content is obscured by a grey box with the text: "Because we're unable to determine your age, we cannot show you this ad." The ad was sponsored and paid for by Ari Hoffman.

Data About This Ad

- Inactive
- Feb 17, 2019 - Feb 18, 2019
- 1K - 5K Impressions
- \$100 - \$499 Money spent (USD)

Who Was Shown This Ad

Age and Gender

Men Women Unknown

Age Group	Men (%)	Women (%)	Unknown (%)
18-24	6%	6%	0%
25-34	15%	10%	0%
35-44	11%	9%	0%
45-54	8%	7%	0%
55-64	6%	6%	0%
65+	4%	0%	0%

Where This Ad Was Shown

The map shows that the ad was shown in Washington state.

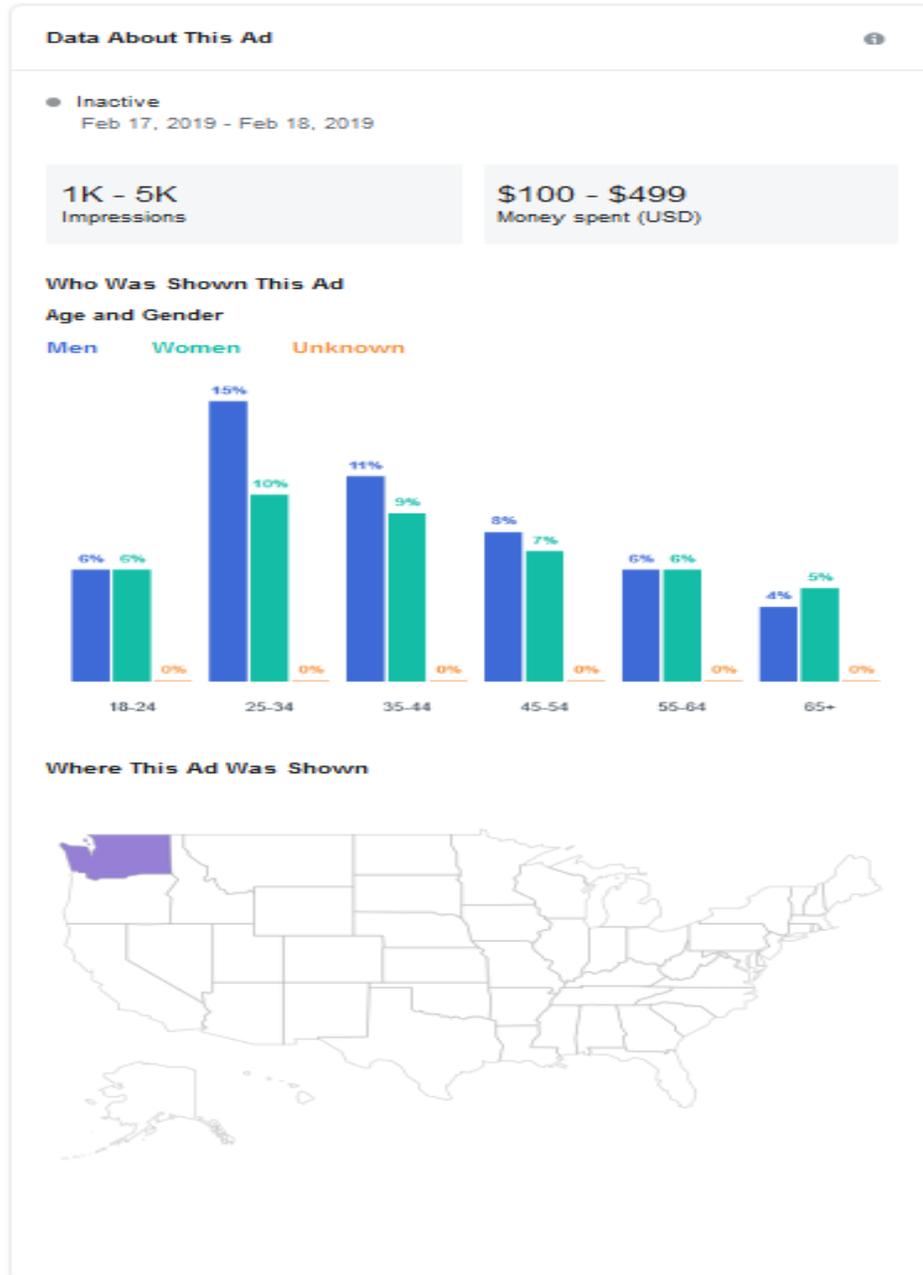
Information from the advertiser

- Disclaimer: Ari Hoffman

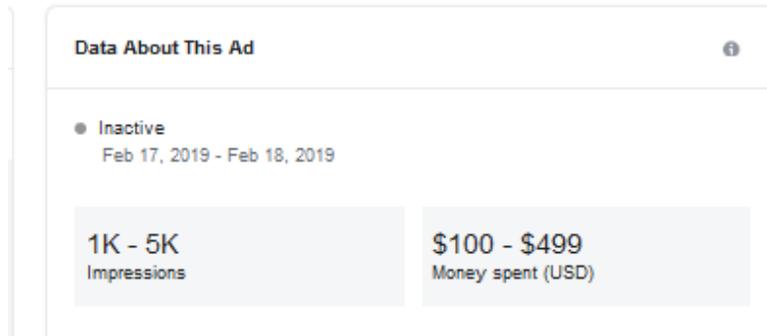
About the Page

- Ari Hoffman
- Total spent by Page on ads related to politics or issues of importance: \$1,734 (May 2018 - May 18, 2019, United States)

- The exact nature and extent of the services rendered. RCW 42.17A.345(1)(b).
 - Does not indicate for the public whether ad was paid per impression or per click, does not list targeting criteria, does not mention what services were provided.



- The total cost and the manner of payment for services. RCW 42.17A.345(1)(c).
 - Uses cost ranges and impression ranges for cost information, but does not indicate the exact cost, whether the sponsor was charged per click or impression, and does not indicate the manner of payment for the public.



- Does provide an exact number for total aggregate costs for the page’s advertising, but does not relate this to impressions or clicks.

Disclaimer	Amount spent United States
Hoffman for Seattle	\$347
▲ These ads ran without a disclaimer.	≤\$100
Ari Hoffman	\$1,382
Total spent by Page	\$1,734

- The name of the candidate or ballot measure supported or opposed, or the name of the candidate otherwise identified, and whether the advertising or communication supports or opposes the candidate or ballot measure. WAC 390-18-050(5)(a).
 - Does not provide this information for the public.
- The name and address of the sponsoring person or persons actually paying for the advertising or electioneering communication, including the federal employee identification number, or other verifiable identification, if any, of an entity, so that the public can know who paid for the advertising or communication, without having to locate and identify any affiliated entities. WAC 390-18-050(5)(b).
 - Does not provide this information for the public.

- The total cost of the advertising or electioneering communication, or initial cost estimate if the total cost is not available upon initial distribution or broadcast, how much of that amount has been paid, as updated, who made the payment, when it was paid, and what method of payment was used. WAC 390-18-050(5)(c).
 - Provides only ranges of cost for individual ads, but does provide aggregate dollar amount for a page.

Data About This Ad ⓘ

● **Inactive**
Feb 17, 2019 - Feb 18, 2019

1K - 5K
Impressions

\$100 - \$499
Money spent (USD)

Disclaimers used by this Page ✕

Disclaimer	Amount spent United States
Hoffman for Seattle	\$347
▲ These ads ran without a disclaimer.	≤\$100
Ari Hoffman	\$1,382
Total spent by Page	\$1,734

- The dates that Facebook rendered service. WAC 390-18-050(5)(d).
 - Provides dates that service was rendered and ad was presented to the public.

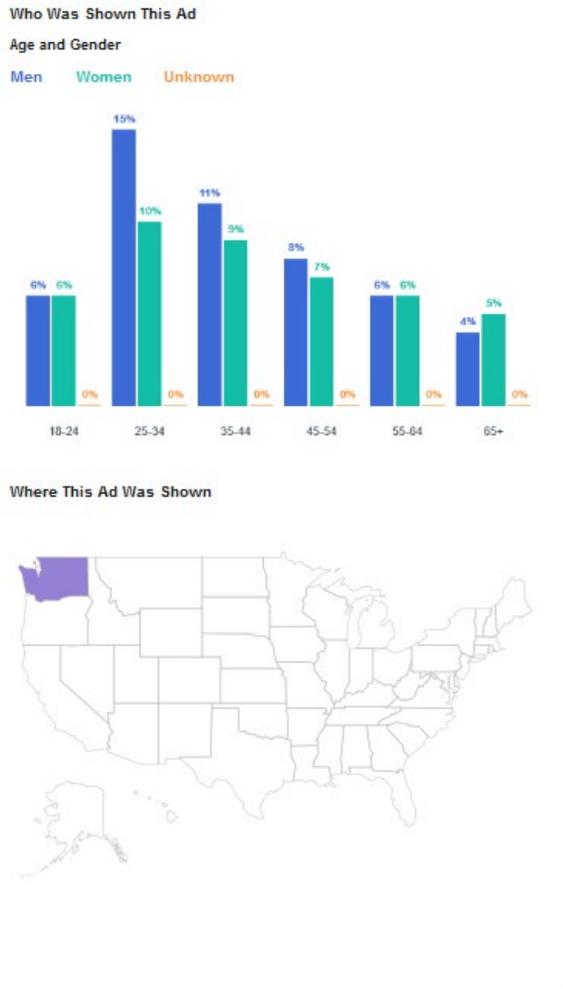
Data About This Ad ⓘ

● **Inactive**
Feb 17, 2019 - Feb 18, 2019

1K - 5K
Impressions

\$100 - \$499
Money spent (USD)

- A description of the demographic information (e.g., age, gender, race, location, etc.) of the audiences targeted and reached, to the extent such information is collected by Facebook as part of its regular course of business, and the total number of impressions generated by the advertisement of communication. WAC 390-18-050(6)(g).
 - Provides some demographic information for the public on audiences reached by age, gender, and location.
 - Does not provide targeting information for the public, or the total number of impressions generated.



Data About This Ad

● Inactive
Feb 17, 2019 - Feb 18, 2019

1K - 5K Impressions	\$100 - \$499 Money spent (USD)
------------------------	------------------------------------

Facebook Ad Order Placement Detailed

- Certification of whether the advertising relates to politics or an issue of national importance.
- Manner of payment to place the advertising.

Account
10363695

Let us know if this ad relates to politics or an issue of national importance

Ad content may be political if it refers to an elected official, a candidate for political office or a notable political figure or if it relates to a national legislative issue of public importance. Review our political ad policy.

Checking this box will add your disclaimer to your ad. We require advertisers to comply with all applicable election laws around these disclaimers. By placing orders for ads related to politics and issues of national importance, you agree to comply with Facebook's Terms and Conditions.

This ad relates to politics or an issue of national importance. [Learn More](#)

Payment Method
VISA *4817 [Change](#)

- Name, U.S. mailing address, phone number, verifiable identification number such as EIN or State ID number, and email address associated with Facebook account or gathered through the political advertising verification process. (see https://www.facebook.com/business/help/208949576550051?helpref=page_content#)
 - Sponsor must have a personal account with their name.
 - If the ad is sponsored by a page, the personal account must be listed as an admin.
 - Must provide a text-capable mobile phone number, or use a two-factor authentication program such as Google Authenticator or LastPass.
 - Sponsor provides mailing address within the U.S., including State and Zip Code
 - Sponsor uploads an image of a United States issued ID or Passport (Address on ID or Passport does not have to match mailing address).
 - Sponsor answers “questions to match your identity.”
 - Answers are reviewed by a third-party.
 - If questions cannot be answered, or ID is not accepted, sponsor may submit a notarized form confirming their identity.
 - Facebook sends a verification code via U.S. Mail to the address provided.
 - Sponsor enters temporary verification code to confirm their identity, then sets a permanent one.
 - Information to verify identity only stored for 30 days.
 - Account must have a payment method with at least one U.S. billing address, including State and Zip Code.

- Audiences targeted by the advertising sponsor.
- Automated targeting criteria used by Facebook to generate more impressions and clicks. (recommended, but optional).

View Results
✕

⊘ Facebook's advertising tools might not work as expected when an ad blocker is enabled in a web browser. Turn off the ad blocker or add this web page's URL as an exception so you can create ads without any problems. After you turn off the ad blocker, you'll need to refresh your screen.

Overview ✎ Edit

AUDIENCE

People you choose through targeting Edit

Location - Living In United States: Olympia (+10 mi)
Washington
Age 18 - 65+

People who like your Page

People who like your Page and their friends

Avocado Toast

Environmental

[See All \(10\)](#) | [Create New Audience](#)

Automatic Placements (Recommended) ON

Use automatic placements to maximize your budget and help show your ads to more people. Facebook's delivery system will allocate your ad set's budget across multiple placements based on where they're likely to perform best. [Learn more.](#)

BUDGET AND DURATION

Preview: Desktop News Feed

Andrew Saturn

Sponsored · Paid for by Andrew Saturn ·

⊘ **PUBLIC POST**

Coming to the table with a compromise is not how you begin negotiations. Jim Cooper proposes we wait until 2021 to push for \$15/hr, and Lisa Parsley believes there's "no need" to go beyond \$12/hr.

MEDIUM.COM

Olympia Councilmember Jim Cooper proposes \$1 minimum wage increase

[Learn More](#)

⚙️ By clicking Save Changes, you agree to Facebook's [Terms & Conditions](#) | [Help Center](#)
Cancel
Save Changes

- Exact cost of advertising, updated daily.
- Exact number of clicks and impressions generated by the advertising, the exact number of people who have seen the advertising and the cost per click or advertising.
- Budget set by campaign, with estimated costs for extensions and associated number of additional people, impressions, or clicks.

View Results
✕

⊖ Facebook's advertising tools might not work as expected when an ad blocker is enabled in a web browser. Turn off the ad blocker or add this web page's URL as an exception so you can create ads without any problems. After you turn off the ad blocker, you'll need to refresh your screen.

Overview ✎ Edit

Performance

You've spent \$0.69 over 1 day.

<div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 5px;"> <p>Link Clicks</p> <p style="font-size: 24px; font-weight: bold; text-align: center;">6</p> </div>	<div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 5px;"> <p>People Reached 68</p> </div>
<div style="border: 1px solid #ccc; padding: 5px;"> <p>Cost per Link Click \$0.12</p> </div>	

Activity

Link Clicks

6

Preview ⋮



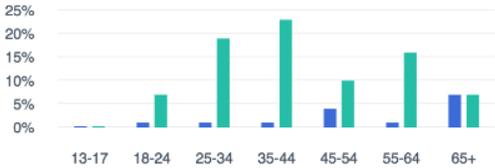
Coming to the table with a compromise is not how you begin negotiations. Jim Cooper proposes we wait until 2021 to push for \$15/hr, and Lisa Parsley believes there's "no need" to go beyond \$12/hr.

Audience ⋮

This ad reached 68 people in your audience.

People
Placements
Locations

17.4% **Women**
82.6% **Men**



Audience Name: United States: Olympia (+10 mi)

Reach More People

Reach More People

Add \$19.98 over 3 days
Reach 2,328 - 9,045 people per day

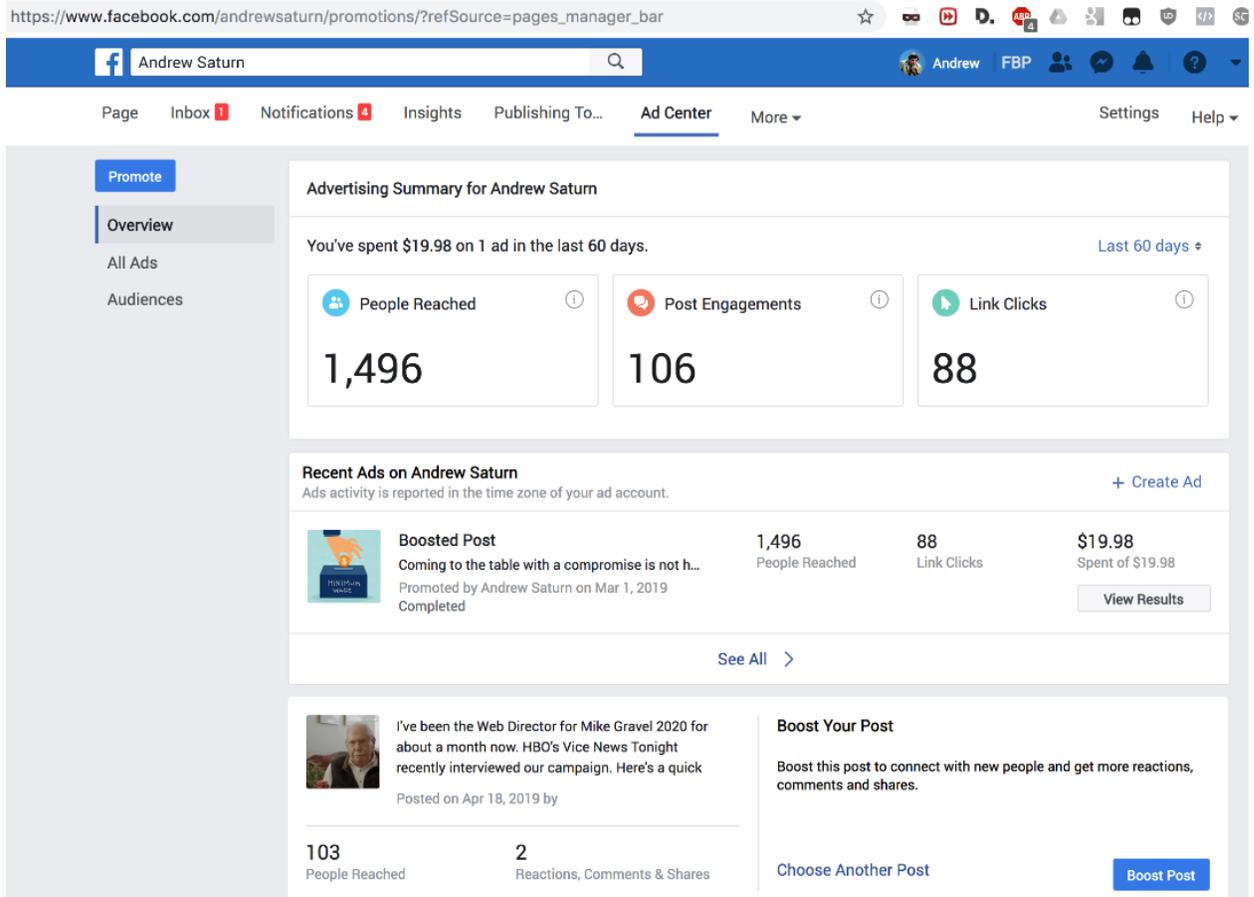
Add \$20 for 1 day
Reach 7,907 - 21,022 people

Add \$100 over 5 days

⚙️ By clicking Add Budget, you agree to Facebook's [Terms & Conditions](#) | [Help Center](#)
Close

Facebook Ad Billing Statement Information and Ad Performance Dashboard (updated daily)

- Total number of people reached, engagements (comment, share, etc.), and clicks with exact cost of advertising.



The screenshot shows the Facebook Ad Performance Dashboard for the page 'Andrew Saturn'. The dashboard is accessed via a browser at the URL https://www.facebook.com/andrewsaturn/promotions/?refSource=pages_manager_bar. The page header includes the name 'Andrew Saturn' and navigation options like 'Page', 'Inbox', 'Notifications', 'Insights', 'Publishing To...', 'Ad Center', 'More', 'Settings', and 'Help'.

Advertising Summary for Andrew Saturn

You've spent \$19.98 on 1 ad in the last 60 days. [Last 60 days +](#)

Metric	Value
People Reached	1,496
Post Engagements	106
Link Clicks	88

Recent Ads on Andrew Saturn [+ Create Ad](#)

Ads activity is reported in the time zone of your ad account.

Ad Type	Description	People Reached	Link Clicks	Spent	Action
Boosted Post	Coming to the table with a compromise is not h... Promoted by Andrew Saturn on Mar 1, 2019 Completed	1,496	88	\$19.98	View Results

[See All >](#)

Boost Your Post

Boost this post to connect with new people and get more reactions, comments and shares.

Choose Another Post [Boost Post](#)

Post Preview:

 I've been the Web Director for Mike Gravel 2020 for about a month now. HBO's Vice News Tonight recently interviewed our campaign. Here's a quick
Posted on Apr 18, 2019 by

Metric	Value
103 People Reached	2 Reactions, Comments & Shares

- Total amount budgeted for the advertising, with objective of advertising (impressions, clicks, website visits, etc.) and total amount billed or spent on the advertising with location and age audience targeting demographics.

View Results ✕

⊖ Facebook's advertising tools might not work as expected when an ad blocker is enabled in a web browser. Turn off the ad blocker or add this web page's URL as an exception so you can create ads without any problems. After you turn off the ad blocker, you'll need to refresh your screen.

Overview ✎ Edit

Reach 1,204 - 4,309 people per day

Add \$100 over 5 days
Reach 3,982 - 12,103 people per day

Add \$400 over 7 days
Reach 9,153 - 28,431 people per day

Add \$1,500 over 9 days
Reach 10,137 - 51,358 people per day

[Select custom budget and duration](#)

This adds \$13 to your original budget.

New budget: \$32.98
Run this ad until: Apr 20, 2019

Add Budget

Age Group	Reach Percentage
13-17	0%
18-24	~7%
25-34	~5%
35-44	~11%
45-54	~7%
55-64	~10%
65+	~8%

Audience Name United States: Olympia (+10 mi)...

Location - Living In United States: Olympia (+10 mi)...

Age 18 - 65+

Details ⋮

<input checked="" type="radio"/> Status	Completed
<input type="radio"/> Objective	Website visitors
<input type="radio"/> Total budget	\$19.98 USD
<input type="radio"/> Amount spent	\$19.98 USD

⚙ By clicking Add Budget, you agree to Facebook's [Terms & Conditions](#) | [Help Center](#)
Close

- Address of the sponsor if political advertising (voluntarily provided) and geographic location of audiences reached.

Ad Performance



Andrew Saturn
Sponsored • Paid for by Andrew Saturn

Coming to the table with a compromise is not how you begin negotiations.

Jim Cooper proposes we wait until 2021 to push for \$15/hr, and Lisa Parshley believes there's "no need" to go beyond \$12/hr.



Olympia Councilmember Jim Cooper proposes \$1 minimum wage increase
Last week, Olympia City Councilmember Jim Cooper shared a proposal with his council colleagues of

[Learn More](#)

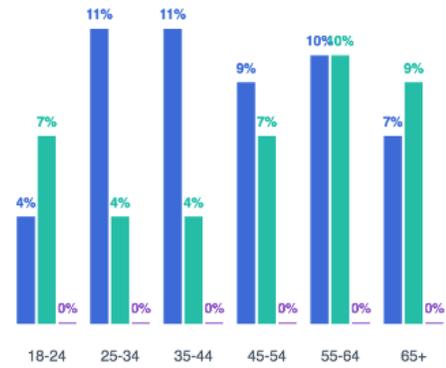
MEDIUM.COM

Impressions Money spent (USD)

Audience Breakdown

Age and Gender

Men Women Unknown



Location



Additional Disclaimer Information

Advertisers provide this information voluntarily.

Disclaimer
Andrew Saturn

Address
PO Box 1052, Olympia, WA 98507

- Exact cost breakdown with clicks, impressions, engagements, and cost for each.

View Results ✕

⊖ Facebook's advertising tools might not work as expected when an ad blocker is enabled in a web browser. Turn off the ad blocker or add this web page's URL as an exception so you can create ads without any problems. After you turn off the ad blocker, you'll need to refresh your screen.

📄 Overview
✎ Edit

Performance

You've spent \$19.98 over 50 days.

<div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 5px;"> <p>Link Clicks</p> <p style="font-size: 2em; font-weight: bold; text-align: center;">88</p> </div>	<div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 5px;"> <p>People Reached 1,496</p> </div>
<div style="border: 1px solid #ccc; padding: 5px;"> <p>Cost per Link Click \$0.23</p> </div>	

Activity

Activity on Facebook

Link Clicks	<div style="width: 88%;"></div> 88
Comments	<div style="width: 7%;"></div> 7
Share	<div style="width: 1%;"></div> 1

Preview



Coming to the table with a compromise is not how you begin negotiations. Jim Cooper proposes we wait until 2021 to push for \$15/hr, and Lisa Parshley believes there's "no need" to go beyond...

Highlighted Comment

Potential customers are commenting on your ad! Reply to join the conversation.



irenecl Dolan Lets pay him 13 dollars a hour stupid jerk

See All
Reply

Reach More People

This ad can reach more people in your audience when you add budget and duration

Audience

This ad reached 1,496 people in your audience.

People
Placements
Locations

⚙️ By clicking Add Budget, you agree to Facebook's [Terms & Conditions](#) | [Help Center](#)
Close