



**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 20, 2019

Delivered electronically to “cprimis@kirkland.com”

Subject: Complaint filed by Andrew Saturn, PDC Case 48307

Dear Facebook, Inc.:

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

As noted in the letter to Andrew Saturn, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

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



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May 20, 2019

Delivered electronically to "saturn@gmail.com"

Subject: Complaint regarding Facebook Inc. (4), PDC Case 47844

Dear Andrew Saturn:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on March 1, 2019. The complaint alleged that Facebook Inc., a commercial advertiser, may have violated RCW 42.17A.345 for failure to promptly provide documents and books of account regarding political advertising upon request.

PDC staff reviewed the allegations; the applicable statutes and rules; and the response provided by Facebook Inc. to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On February 15, 2019, you contacted Facebook through their online Advertiser Support chat, inquiring how you could request records about political advertising pursuant to RCW 42.17A.345.
- The chat agent replied on behalf of Facebook, directing you to view the Ad Archive for information on advertising related to politics or issues of national importance that have appeared on either Facebook or Instagram.
- You indicated that the Ad Archive only contained information about paid ads, and when asked for an example of an unpaid ad, provided a screenshot of a Facebook post that did not solicit votes or financial contributions in support or opposition to any election campaign.
- You did not request information concerning this post, or any other political advertising, and ended the conversation stating "*it's ok for now I'll reach out if I need anything else. thanks.*"
- You indicated that you attempted to make a phone call, using a number found through a third party website, but were unable to speak with anyone to make a request for commercial advertiser records.
- You indicated that you visited the Facebook office in Seattle, but were told that they did not keep the records on-site and were advised to contact Facebook through the Advertiser Support as described above.
- You then clarified that you could not provide any evidence of your visit to Facebook, including an approximate date and time, and that the person you spoke with was "*just a generic security person (likely a contractor) who wouldn't let me speak to anyone or go inside.*"

Based on our findings staff has determined that, in this instance, no evidence supports a finding that you made a request for commercial advertiser records relating to political advertising, or that Facebook Inc. denied you access to these records.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

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

cc: Facebook, Inc.