



**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

September 25, 2019

Delivered electronically to Mark Lamb on behalf of Washington Realtors Political Action Committee at "mark@northcreeklaw.com"

Subject: Complaint filed by Guy Thompson, PDC Case 55218

Dear Mr. Lamb:

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

As noted in the letter to Mr. Thompson, 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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by email at pdc@pdc.wa.gov.

Sincerely,

/s _____
Jennifer Hansen
Compliance Officer

Endorsed by,

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



**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

September 25, 2019

Delivered electronically to Guy Thompson at "guyjohnt@gmail.com"

Subject: Complaint regarding Washington Realtors Political Action Committee, PDC Case 55218

Dear Guy Thompson:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 17, 2019. Your complaint alleged that the Washington Realtors Political Action Committee (WA Realtors PAC), a continuing political committee registered for calendar year 2019, may have violated RCW 42.17A.320 for failure to include sponsor identification on digital political advertising done in support of People for Nadine Woodward, a 2019 candidate for Spokane mayor.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Mark Lamb on behalf of his client WA Realtors PAC; and the applicable PDC reports filed by Respondent, to determine whether the record supports a finding of one or more violations.

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

- The Washington Realtors Political Action Committee is a continuing political committee registered for calendar year 2019 and filing Summary Full Campaign Contribution and Expenditure reports (C-4 reports) and Independent Spending & Electioneering Communications reports (C-6 reports), disclosing expenditures made in support of candidates running in the 2019 primary and general elections.
- RCW 42.17A.320 requires that, unless otherwise exempt, all written political advertisement shall include the sponsor's name and address and if the political advertisement is undertaken as an independent expenditure, the advertisement must also include the statement "No candidate authorized this ad. It is paid for by (name, address, city, state)." In addition, if the sponsor is a political committee, the ad must also include the statement "Top Five Contributors," followed by the names of the largest contributors to the committee, and, if necessary, the statement "Top Three Donors to PAC Contributors" followed by the names of non-PAC donors.
- WAC 390-18-030 identifies exemptions from sponsor identification and alternatives for online advertising stating that "small online advertising may provide the required disclosures by using an automatic display with the advertising that takes a reader directly the required disclosures" with one click.
- The complaint included static copies of a digital political advertisement supporting 2019 Spokane mayoral candidate, Nadine Woodward, which the complaint alleged did not

contain the required sponsor identification language required by RCW 42.17A.320 and that the person responsible for the ads was unknown to the public. The ads were presented to the public from July 9, 2019 until August 6, 2019.

- In his response, Mr. Lamb stated that WA Realtors PAC was responsible for the advertisements referenced in the complaint and that the ads did contain the required sponsor identification accessible through one click.
- Staff's review of the landing page originally accessible through one click from the online advertisement found the required sponsor identification language with the top five and top three contributors required by RCW 42.17A.320.

It appears that the online advertisements presented in support of the People for Nadine Woodward 2019 campaign were sponsored by WA Realtors PAC and that the advertisements contained sponsor identification required by RCW 42.17.320 and WAC 390-18-030 and were accessible through one click on the ad.

Based on these findings staff has determined that, in this instance, no evidence supports a finding of a violation warranting further investigation.

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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Jennifer Hansen
Compliance Officer

Endorsed by,

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

cc: Mark Lamb, Attorney for WA Realtors PAC