



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)**

October 2, 2019

Delivered electronically to "JRobinson@TristerRoss.com"

Subject: Complaint filed by Tallman Trask, PDC Case 55344

Dear Unite Here:

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

As noted in the letter to Tallman Trask, 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 e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

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Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director



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October 2, 2019

Delivered electronically to “tallman.trask@gmail.com”

Subject: Complaint regarding Unite Here, PDC Case 55344

Dear Tallman Trask:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 23, 2019. The complaint alleged that Unite Here (Respondent), a labor organization, may have violated RCW 42.17A.320 for failure to completely and accurately disclose sponsor identification on digital political advertising; RCW 42.17.250 for failure to register as an out-of-state political committee and to report contributions and expenditures; and RCW 42.17A.255, .260, and .305 for failure to timely, accurately, and completely disclose independent expenditures and electioneering communications.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; and the response provided by Unite Here Local 8 PAC, to determine whether the record supports a finding of one or more violations.

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

- The complaint provided evidence of political advertising distributed on Facebook by a page named “Unite Here,” which was alleged to be a resource controlled by the Unite Here national labor organization, not the Unite Here Local 8 PAC.
- On August 13, 2019, in response to related PDC Case 55345, Unite Here Local 8 PAC confirmed that they sponsored the political advertising in support of candidate Andrew Lewis, as reported, and hosted it on the Unite Here page at “<https://facebook.com/uniteherepage/>,” which is separate and distinct from the international Unite Here Facebook page at “<https://www.facebook.com/UniteHere/>.”
- On August 27, 2019, the Respondent provided a response to the allegations in PDC Case 55344, indicating that the political advertising was sponsored by Unite Here Local 8 PAC, and incorporating the details of the response in PDC Case 55345 by reference.

Based on our findings staff has determined that, in this instance, no evidence supports a finding of a violation that warrants 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov).

Sincerely,

/s

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Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Unite Here