

## Complaint Description

Tallman Trask (Tue, 23 Jul 2019 at 10:40 AM)

Public Disclosure Commission  
711 Capital Way South, #206  
Olympia, WA 98504  
October 25, 2018

To Whom It May Concern:

Social media advertisers have consistently struggled to remain in compliance with Washington state laws and regulations on political advertising, while the more than \$80,000 spent already this year on Facebook advertising for and in support of/opposition to candidates in Seattle alone is certainly concerning and continues to make it clear that certain companies are not interested in following the law, the directives of the Public Disclosure Commission, and their own promises, this complaint does not revolve around Facebook's likely failure to provide disclosures as a commercial advertiser, but rather a failure to meet disclosure requirements and follow rules by a Political Advertising Committee as it purchased advertising for a local race.

Images of the ads in question are attached to this complaint.

### **1. Violation of RCW 42.17A.320**

Unite Here and/or Unite Here Local 8 PAC failed to provide required sponsorship information. While the video portion of the advertising provides information on sponsorship and contributors, ad viewers could only find that information after having watched the video, even though the ad's text content is also a political ad.

### **2. Violation of RCW 42.17A.235**

While the ad proports to have been paid for by Unite Here Local 8 PAC, these appears inaccurate. As the Facebook ad is running not on a page managed by Unite Here Local 8 PAC, but rather by the national Unite Here organization, it must be the case that some payment or staff time was used by the national organization in order to place and purchase the ad, nor could the ad have been placed except by someone with permissions to purchase ads on behalf of the national Unite Here organization. If it is the case, as it appears, that the Unite Here Local 8 PAC gave funds to the national Unite Here organization in order to purchase the ads in question, it is also the case that those funds ought to have been disclosed by Unite Here Local 8 PAC as a contribution to the national Unite Here organization, though no report filed by Unite Here Local 8 PAC discloses any such contribution, nor do they disclose in-kind contributions from the national Unite Here organization.

### 3. Violation of RCW 42.17A.250

Should it be the case that the ads placed on Facebook were, in fact, placed by the national Unite Here organization, and not Unite Here Local 8 PAC, the national Unite Here organization ought to be filing required reports as an out-of-state political committee making independent expenditures, including donor information. They have not filed any reports.

While the potential violations here may appear relatively minor, they serve to highlight the ease via which organizations can avoid Washington campaign finance disclosure laws online, and the degree to which social and digital media companies continue to facilitate these violations, despite repeated statements that they will cease selling ads like the ones in question in this complaint. It all too easily becomes a difficult-to-track, easy-to-exploit political advertising shell game, which is exactly what the people of Washington did not want when they created the Public Disclosure Commission almost 50 years ago.

Thank you for your consideration in this important matter,

Tallman Trask

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

The violations make it more difficult than it ought to be to track the influence of money in Washington's elections, including potential spending by out-of-state groups. The total spending disclosed for the ads in question is \$150,000, a significant amount to be spent in an election for a district with fewer than 100,000 residents.

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

Images of the advertising in question attached; other evidence can be found in the PDC's records (or cannot be found, which is the point of the complaint).

#### **List of potential witnesses with contact information to reach them.**

Not applicable

#### **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.

Public Disclosure Commission  
711 Capital Way South, #206  
Olympia, WA 98504  
October 25, 2018

To Whom It May Concern:

Social media advertisers have consistently struggled to remain in compliance with Washington state laws and regulations on political advertising, while the more than \$80,000 spent already this year on Facebook advertising for and in support of/opposition to candidates in Seattle alone is certainly concerning and continues to make it clear that certain companies are not interested in following the law, the directives of the Public Disclosure Commission, and their own promises, this complaint does not revolve around Facebook's likely failure to provide disclosures as a commercial advertiser, but rather a failure to meet disclosure requirements and follow rules by a Political Advertising Committee as it purchased advertising for a local race.

Images of the ads in question are attached at the end of this document.

**1. Violation of RCW 42.17A.320**

Unite Here and/or Unite Here Local 8 PAC failed to provide required sponsorship information. While the video portion of the advertising provides information on sponsorship and contributors, ad viewers could only find that information after having watched the video, even though the ad's text content is also a political ad.

**2. Violation of RCW 42.17A.235**

While the ad proports to have been paid for by Unite Here Local 8 PAC, these appears inaccurate. As the Facebook ad is running not on a page managed by Unite Here Local 8 PAC, but rather by the national Unite Here organization, it must be the case that some payment or staff time was used by the national organization in order to place and purchase the ad, nor could the ad have been placed except by someone with permissions to purchase ads on behalf of the national Unite Here organization. If it is the case, as it appears, that the Unite Here Local 8 PAC gave funds to the national Unite Here organization in order to purchase the ads in question, it is also the case that those funds ought to have been disclosed by Unite Here Local 8 PAC as a contribution to the national Unite Here organization, though no report filed by Unite Here Local 8 PAC discloses any such contribution, nor do they disclose in-kind contributions from the national Unite Here organization.

**3. Violation of RCW 42.17A.250**


Should it be the case that the ads placed on Facebook were, in fact, placed by the national Unite Here organization, and not Unite Here Local 8 PAC, the national Unite Here organization ought to be filing required reports as an out-of-state political committee making independent expenditures, including donor information. They have not filed any reports.

While the potential violations here may appear relatively minor, they serve to highlight the ease via which organizations can avoid Washington campaign finance disclosure laws online, and the degree to which social and digital media companies continue to facilitate these violations, despite repeated statements that they will cease selling ads like the ones in question in this complaint. It all too easily becomes a difficult-to-track, easy-to-exploit political advertising shell game, which is exactly what the people of Washington did not want when they created the Public Disclosure Commission almost 50 years ago.

Thank you for your consideration in this important matter,

Tallman Trask

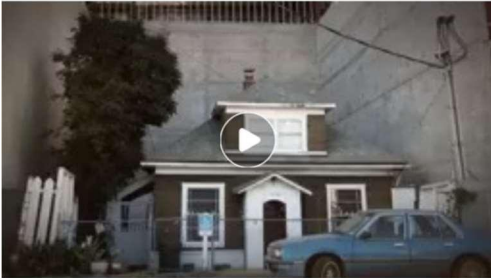
**Images of Ads**


**Unite Here**  
 Sponsored • Paid for by Unite Here

Andrew Lewis grew up near Edith Macefield's home. He remembers her.

For Andrew, the people who live here are more important than cutting ribbons with developers.

For Edith. For Andrew. Andrew Lewis for City Council.



Andrew Lewis for City Council

---

**About the disclaimer**

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

---

**Information from the advertiser**

Disclaimer  
Unite Here

**Data About This Ad**

● Inactive  
Started running on Jul 12, 2019

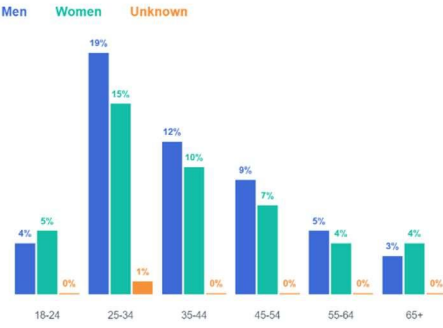
5K - 10K  
Impressions

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

**Who Was Shown This Ad**


Age and Gender

Men Women Unknown



Age Group	Men	Women	Unknown
18-24	4%	5%	0%
25-34	19%	15%	1%
35-44	12%	18%	0%
45-54	9%	7%	0%
55-64	5%	4%	0%
65+	3%	4%	0%

**Where This Ad Was Shown**




**Unite Here**  
 Sponsored • Paid for by Unite Here

Andrew Lewis grew up near Edith Macefield's home.

For Andrew, the people who live here are more important than cutting ribbons with developers.

For Edith. For Andrew. For City Council.



Andrew Lewis for City Council

---

**About the disclaimer**

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

---

**Information from the advertiser**

Disclaimer  
Unite Here

**Data About This Ad**

● Inactive  
Started running on Jul 13, 2019

1K - 5K  
Impressions

<\$100  
Money spent (USD)

**Who Was Shown This Ad**

Age and Gender

Men Women Unknown



Age Group	Men	Women	Unknown
18-24	4%	4%	0%
25-34	18%	20%	1%
35-44	13%	11%	0%
45-54	8%	6%	0%
55-64	4%	4%	0%
65+	3%	3%	0%

**Where This Ad Was Shown**



Multiple versions of this ad ⓘ

2 of 2



**Unite Here**  
Sponsored • Paid for by Unite Here

...

Andrew Lewis grew up near Edith Macefield's home.

For Andrew, the people who live here are more important than cutting ribbons with developers.

For Edith. For Andrew. For City Council.



Andrew Lewis for City Council

**About the disclaimer**

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

**Information from the advertiser**



Disclaimer  
Unite Here

**Data About This Ad** ⓘ

● Active  
Started running on Jul 14, 2019

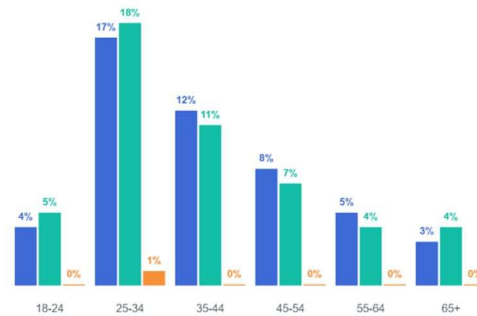
100K - 200K  
Impressions

\$1K - \$5K  
Money spent (USD)

**Who Was Shown This Ad**

**Age and Gender**

Men Women Unknown



**Where This Ad Was Shown**



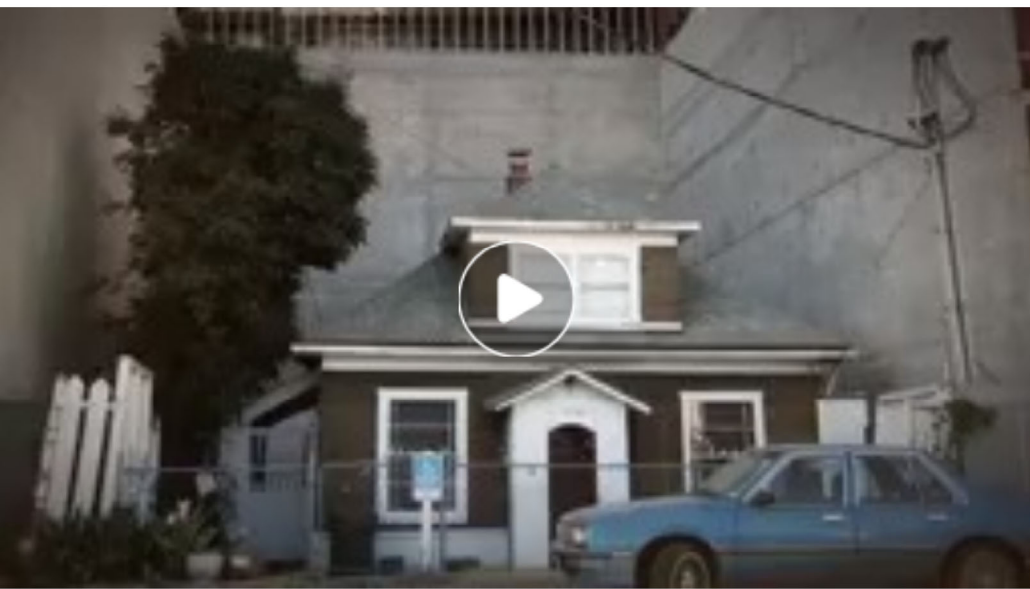


**Unite Here**  
Sponsored • Paid for by Unite Here

Andrew Lewis grew up near Edith Macefield's home. He remembers her.

For Andrew, the people who live here are more important than cutting ribbons with developers.

For Edith. For Andrew. Andrew Lewis for City Council.



Andrew Lewis for City Council

About the disclaimer

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

Information from the advertiser

Disclaimer  
Unite Here

Data About This Ad



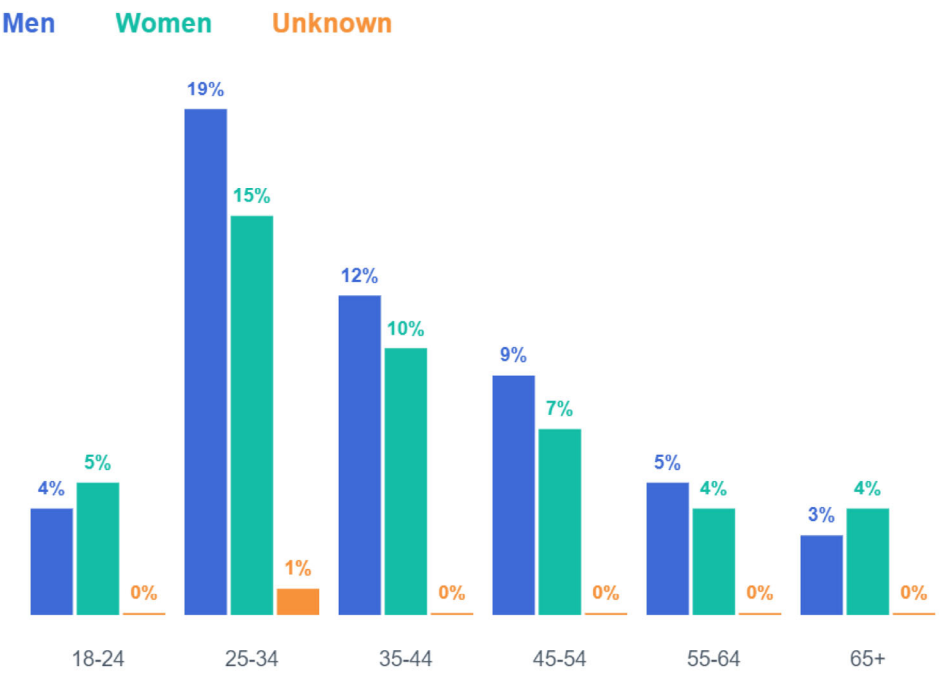
Inactive  
Started running on Jul 12, 2019

5K - 10K  
Impressions

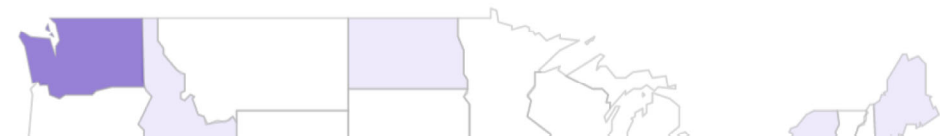
\$100 - \$499  
Money spent (USD)

Who Was Shown This Ad

Age and Gender



Where This Ad Was Shown



 **Unite Here**  
Sponsored • Paid for by **Unite Here**

Andrew Lewis grew up near Edith Macefield's home.

For Andrew, the people who live here are more important than cutting ribbons with developers.

For Edith. For Andrew. For City Council.





Andrew Lewis for City Council

**About the disclaimer**

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

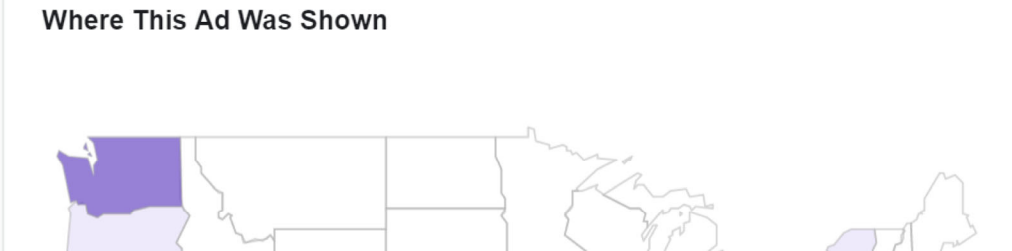
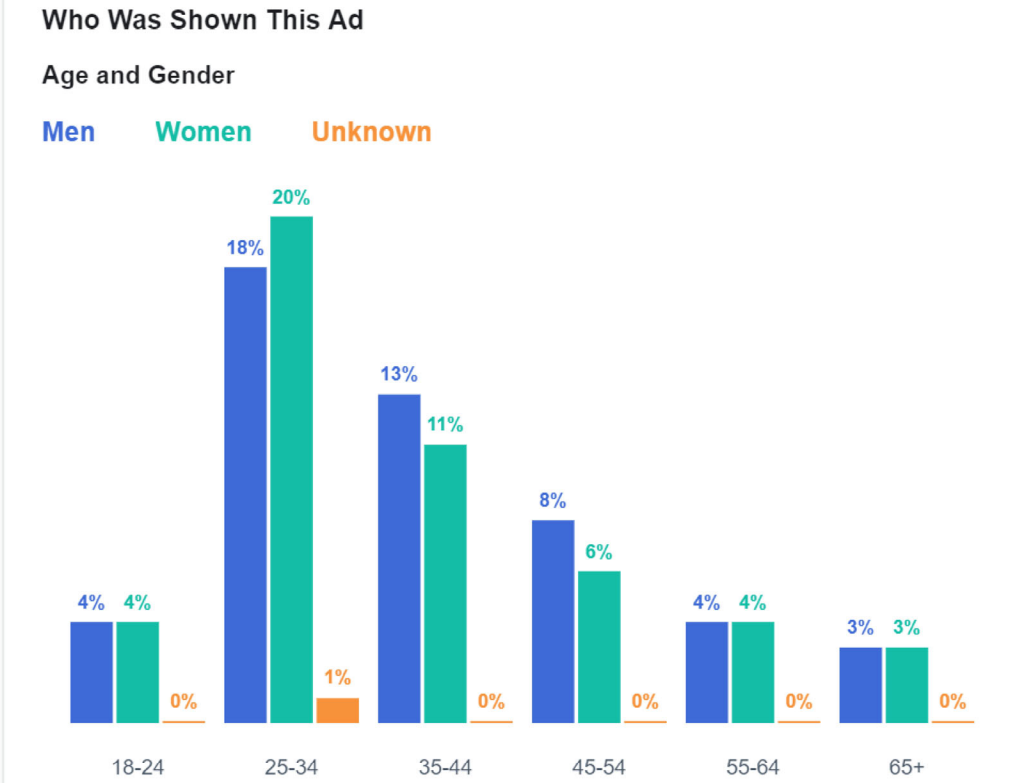
Information from the advertiser ^

 **Disclaimer**  
Unite Here

 Inactive  
Started running on Jul 13, 2019

1K - 5K  
Impressions

<\$100  
Money spent (USD)





 **Unite Here**  
Sponsored • Paid for by **Unite Here**

⋮

Andrew Lewis grew up near Edith Macefield's home.

For Andrew, the people who live here are more important than cutting ribbons with developers.

For Edith. For Andrew. For City Council.



Andrew Lewis for City Council

**About the disclaimer**

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

Information from the advertiser

⤴

 Disclaimer  
Unite Here

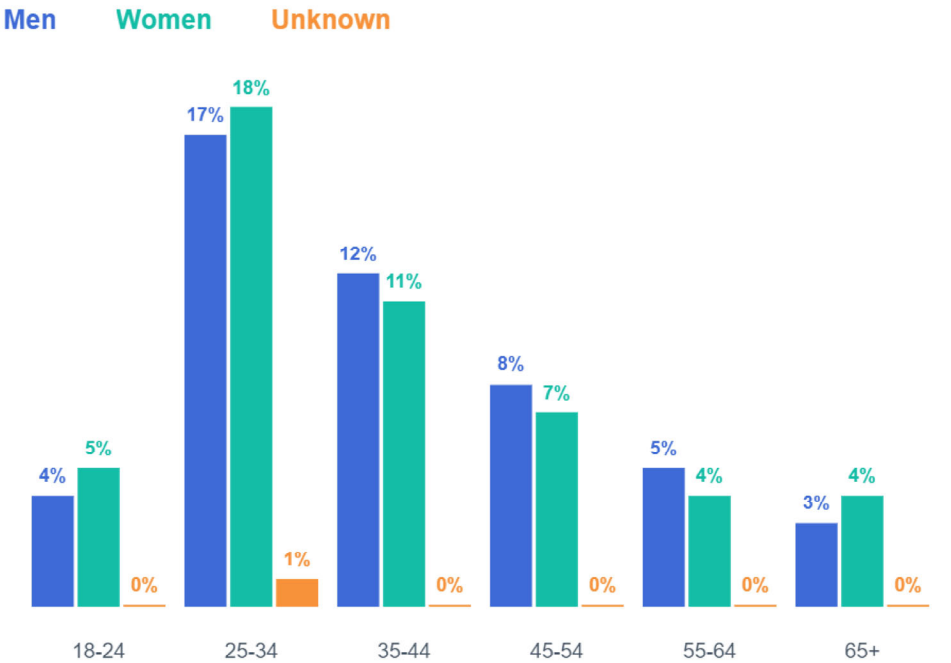
● Active  
Started running on Jul 14, 2019

100K - 200K  
Impressions

\$1K - \$5K  
Money spent (USD)

Who Was Shown This Ad

Age and Gender



Where This Ad Was Shown

