



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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October 18, 2019

Delivered electronically to Tarn Ohana at [tarn.ohana@gmail.com](mailto:tarn.ohana@gmail.com)

Subject: Complaint regarding the Moms for Seattle, PDC Case 56008

Dear Mr/Ms. Ohana:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 1, 2019. Your complaint alleged that the Moms for Seattle (Committee), may have violated RCW 42.17A.255 and .305 by failing to file a C-6 report that meets electioneering communication requirements.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable C-6 reports filed by the Committee; and the response provided by the Committee.

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

- On May 24, 2019, the Committee filed a Committee Registration report (C-1pc) for 2019, selecting Full Reporting Option and listing Kevin Topping and Celeste Ramberg as treasurer and deputy treasurer, respectively.
- The Committee originally filed a C-6 report on July 16, 2019, wherein it did not fully describe/include the identity of the sub-vendor digital platforms for the digital ads as required by RCW 42.17A.305(1)(c). However, on the same day, July 16, 2019, the Committee also filed a C-4 report and amended the same report to include sub-vendor information related to the digital ads at issue in this matter.
- On October 1, 2019, the Committee indicated its belief that the original C-6 report met PDC reporting requirements. Specifically, the Respondent stated, by way of its treasurer, Kevin Topping, that "since the purpose of the C-6 is to demonstrate how much is being spent by a committee and who it is in support of or against, it seems superfluous to amend this report given that the actual expenses are reported in the amended C-4. In both

initial filings, good faith efforts were made to report, in as timely manner as possible, the spending and who it would benefit or oppose. The voters of Washington were fully aware that a certain amount of money was being spent on behalf of certain candidates for Seattle City Council and the type of communication that the committee was utilizing.”

- On October 10, 2019 and September 10, 2019, the Committee amended its C-6 and C-4 reports respectively, to facilitate additional transparency.

Based on these findings staff has determined that, in this instance, the failure to fully describe and/or include the sub-vendor digital platforms for the digital ads in the original C-6 filed on July 16, 2019, does not amount to a violation warranting further investigation.

Staff is reminding the Moms for Seattle about the importance of fully and accurately describing expenditures regarding digital ads in all future electioneering communications, specifically to include the names of the sub-vendor digital platforms/ information as required by RCW 42.17A.305(1)(c).

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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

Endorsed by,

s/ \_\_\_\_\_  
Erick Agina, Compliance Officer

s/ \_\_\_\_\_  
BG Sandahl, Deputy Director  
For Peter Lavalley, Executive Director

cc: Moms for Seattle

