

File a Formal Complaint - Tarn Ohana

Tarn Ohana reported (Thu, 1 Aug 2019)

The filing C6-9177 fails to meet the requirements of 42.17A.305 sections (1)(c) and (1)(d). The expenditures are made by Moms of Seattle committee to 'Western Consultants LLC' for the purposes of 'digital campaign ads.' However, it appears that the 'digital campaign ads' ran in different media and through multiple digital platforms involving expenditures to different companies, which also seems to violate section (1)(e).

This causes a significant break between the reporting of electioneering communication expenditures reporting by the spenders, and the ability to corroborate the expenditures on the part of the vendors. No longer is there any ability to match these expenditures to receipts by commercial advertisers, as is required by 42.17A.345... unless Western Consultants LLC is going to present itself as a commercial advertiser under that RCW, which is impossible as it only exists as a PO Box in Seattle as a Nevada-registered LLC. I believe that these failings constitute an conscious attempt to skirt the clear laws of this state on campaign finance reporting.



Elisabeth James

4 hrs ·



The Moms have advised me that their consultant purchased ads through Google & without their knowledge Google placed them on Breitbart. Founding moms are clearly disclosed on this post and are new to all of this.



MOMSFORSEATTLE.COM

Home | Moms for Seattle

We have a City Council that isn't seeking real solutio...

[LEARN MORE](#)

Like

Comment

Share



Reporting Form for: (check one)

Instructions on Page 3

- INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
 INDEPENDENT EXPENDITURE ADS (Appearing within 21 days of an election) — **\$1,000 or more**
 ELECTIONEERING COMMUNICATIONS, Except Contributions (Appearing within 60 days of an election) — **\$1,000 or more**

| | |
|---|----------------------------------|
| 1. Name and complete postal mailing address of sponsor: MOMS FOR SEATTLE 1037 NE 65TH ST, #103 SEATTLE, WA 98115 | E-mail |
| | INFO@MOMSFORSEATTLE |
| | Telephone 206-779-7456 |

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

| Date Made | Date First Presented/ Mailed | Name and Address of Vendor or Recipient | Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad) | Amount or Value (*See Below) |
|-----------|------------------------------|---|---|------------------------------|
| 07/15/19 | 07/15/19 | WESTERN CONSULTANTS LLC PO BOX 9517 SEATTLE, WA 98109 | DIGITAL CAMPAIGN ADS | 69,000.00 |

Expenditures \$100 or less not itemized above \$ 0.00

Total this report \$ 69,000.00

Amount or Value
 *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.

Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.
 \$ 69,000.00

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

| Candidate/Proposition | Office/District/ Proposition No. | Party | Check Support or Oppose | Show portion of current expense attributable to each candidate or proposition | Show total C-6 expenses related to each candidate/ proposition during election campaign |
|-----------------------|-------------------------------------|--------------|--|---|---|
| GEORGE, MICHAEL | CITY COUNCIL MEMBER/CITY OF SEATTLE | NON PARTISAN | <input checked="" type="checkbox"/> <input type="checkbox"/> | \$ 17,250.00 | \$ 0.00 |
| MURAKAMI, PATRICIA | CITY COUNCIL MEMBER/CITY OF SEATTLE | NON PARTISAN | <input checked="" type="checkbox"/> <input type="checkbox"/> | \$ 17,250.00 | \$ 0.00 |
| PEDERSEN, ALEX | CITY COUNCIL MEMBER/CITY OF SEATTLE | NON PARTISAN | <input checked="" type="checkbox"/> <input type="checkbox"/> | \$ 17,250.00 | \$ 0.00 |
| WILLS, HEIDI | CITY COUNCIL MEMBER/CITY OF SEATTLE | NON PARTISAN | <input checked="" type="checkbox"/> <input type="checkbox"/> | \$ 17,250.00 | \$ 0.00 |

Filer Name:

4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) **x** A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

| Date Received | Source's Name, Address, City, State, Zip | For individuals, Employer's Name, City and State | Amount |
|-----------------------------|--|--|----------------|
| | | | \$ |
| | | Occupation | |
| | | | \$ |
| | | Occupation | |
| | | | \$ |
| | | Occupation | |
| | | | \$ |
| | | Occupation | |
| | | | \$ |
| | | Occupation | |
| | | Sub-Total | \$ 0.00 |
| | Continued on attached sheet <input type="checkbox"/> | Amount from attached pages | \$ 0.00 |
| TOTAL FUNDS RECEIVED | | | \$ 0.00 |

| Sponsor of Independent Expenditure or Electioneering Communication | | | |
|--|--|---|--|
| I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge. | Signature | Printed Name KEVIN TOPPING | |
| | Street address 1037 NE 65TH ST #103 | | |
| | City/State/Zip SEATTLE WA 98115 | | |
| | Date Signed 07/16/19 | Place Signed (city and county) SEATTLE KING | |
| | *RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor." | | |

Complaint Description

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

The people of Washington State have articulated a strong desire to clearly follow the money being spent on political advertising. Understanding how money is being spent, by whom, on behalf of whom, helps me and my fellow voters understand where digital (especially digital!) advertising is coming from and why. Clear trails of campaign expenditures also allows the people of Washington State to monitor campaigns for political office for signs of corruption, or other sorts of quid-pro-quos.

List of attached evidence or contact information where evidence may be found

image a screenshot of a representative of Moms for Seattle, independent committee, stating that their consultant spent money on advertising without authorization.
file C6-9177 - a filing by Kevin Topping, agent for Moms for Seattle, for electioneering communications expenditures to Western Consultants LLC - for digital advertising

List of potential witnesses with contact information to reach them

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.