

[Cowlitz Dems](#) (Mon, 23 Sep 2019 at 7:31 PM)

to: "PDC Support" <pdcc@pdcc.wa.gov>

Dear Public Disclosure Commission,

The attached images were neither created nor distributed at the request of the Cowlitz County Democratic Central Committee. While some individuals who shared the images on Facebook, including myself, may be members of the CCDCC, the images were never distributed or shared by the official Cowlitz County Democrats Facebook page or on the Cowlitz County Democratic Central Committee webpage, but only on personal social media pages.

No money has been spent either in the creation or distribution of these images. Distribution has been isolated to personal Facebook pages.

Therefore I submit that the images meet the following qualifications listed on the PDC's Political Advertising Guide and do not require sponsor ID.

"The sponsor's name & address may be left off of a political ad that meets all of the following criteria:

- the sponsor is an individual acting on his or her own behalf, independent of any candidate, political committee or organization, who personally produces and distributes the ad (or pays for it to be produced and/or distributed);
- the sponsor receives no contributions or other support to produce and distribute the ad;
- no more than \$50 in the aggregate is spent for online advertising or \$100 in the aggregate for any other type of advertising; and
- the advertising is EITHER distributed through the individual's social media site, personal website, or similar online forum where information is produced and disseminated only by the individual OR a letter, flier, handbill, text or email from the individual that does not appear in a newspaper or comparable mass publication."

I am happy to answer any further questions you may have.

Respectfully,
Summer O'Neill

I will take responsibility, as an individual, for the images attached. They were created using a free, open-source, readily available, online software program and distributed via personal Facebook accounts. As an individual, I did not act on behalf of any candidate, committee or party in the creation or distribution of the images. I did not receive or spend funds for the creation or distribution of the images. I maintain that the images are exempt from requiring sponsor ID because they meet all of the following qualifications:

The sponsor is an individual acting on his or her own behalf, independent of any candidate, political committee or organization, who personally produces and distributes the ad (or pays for it to be produced and/or distributed);

The sponsor receives no contributions or other support to produce and distribute the ad;

No more than \$50 in the aggregate is spent for online advertising or \$100 in the aggregate for any other type of advertising; and

The advertising is EITHER distributed through the individual's social media site, personal website, or similar online forum where information is produced and disseminated only by the individual OR a letter, flier, handbill, text or email from the individual that does not appear in a newspaper or comparable mass publication."

Respectfully,

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