



**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 • Website: www.pdca.wa.gov

November 5, 2019

Delivered electronically to "pete.miller4@comcast.net"

Subject: PDC Cases 58719 & 58801

Dear Peter Miller:

Below is a copy of an electronic letter sent to Abraham Ritter and Joan Halbert concerning complaints filed with the Public Disclosure Commission (PDC).

As noted below to Abraham Ritter and Joan Halbert, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of identifying the sponsor's name and address on political advertising, including billboards. PDC staff expects that you will include this information on political advertising in future years in accordance with PDC laws and rules.

If you have questions, you may contact Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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November 5, 2019

Delivered electronically to "rittera2@gmail.com" and "jmhalbert@yahoo.com"

Subject: Complaints regarding Peter Miller, PDC Cases 58719 & 58801

Dear Abraham Ritter & Joan Halbert:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on October 15, 2019. Your complaints alleged that Peter Miller (the "Respondent") may have violated RCW 42.17A.320 by failing to identify the sponsor on political advertising.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; and the response provided by the Respondent to determine whether they support a finding of one or more violations.

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

- The Respondent is a candidate running for School Director for Tahoma School District 409, position 4. The Respondent registered with the PDC on May 11, 2019.
- Pursuant to RCW 42.17A.320, all written political advertising shall include the sponsor's name and address, which must 1) be set apart from other printed matter; 2) appear on the first page of the advertisement or communication; 3) be in at least 10-point type or 10% of the largest type used in the advertising, whichever is larger; and 4) not be subject to a half-tone or screening process. RCW 42.17A.005(46(a)) defines "sponsor" as the person paying for the political advertising.
- During the 2019 election, the Respondent and fellow candidate Malia Hollowell co-sponsored advertising that appeared on a billboard in Maple Valley, Washington. The billboard did not include the names and addresses of the billboard's sponsors.
- The Respondent is a first-time candidate who indicated he was unaware of the sponsor identification requirements for political advertising. He erroneously believed that advertising candidates pay for themselves does not require sponsor ID. Upon being notified of the missing information on October 16, 2019, the Respondent immediately took steps to remedy noncompliance by contacting the billboard company the same day and instructing them to reprint the advertising.
- The revised billboard, including sponsor identification, was posted on October 25, 2019.

Mitigating factors in this case include: The Respondent's status as a first-time candidate; noncompliance was the result of a good-faith error or omission for which the Respondent quickly took corrective action; and the relatively small size or sophistication of the Respondent's campaign.

Based on these findings, staff has determined that, in this instance, failure to include sponsor identification on political advertising does not amount to a violation warranting further investigation.

PDC staff is reminding Peter Miller about the importance of identifying the sponsor's name and address on political advertising, including billboards.

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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Peter Miller