# **Complaint Description**

Tallman Trask (Wed, 30 Oct 2019 at 3:15 PM)

Please see the attached complaint.

- Tallman Trask

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

Political advertising disclosures are an important part of Washington's campaign finance system. Ensuring that commercial advertisers selling this advertising follow the laws of our state is necessarily in the public interest.

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

Please see the PDC Reports listed in the attached complaint.

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

None known.

## **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 30, 2019

## To Whom It May Concern:

This is a complaint related to political advertising sales by Choozle, a corporation and digital advertising seller with a primary place of business in Colorado, during the 2019 Washington elections. Specifically, it alleges that Choozle continues to fail to meet disclosure obligations under RCW 42.17A.345 and WAC 390-18-050.

#### **Evidence of Political Advertising Sales**

Choozle advertising purchases have been disclosed in the Public Disclosure Commission reports listed below:

- 100930145
- 100939902

#### **Attempt to Inspect Records**

Thank you in advance for supplying these records

On October 27, 2019, I emailed Choozle at all publicly discoverable email addresses, explaining the specifics of my request for information. I have included a copy of that email below.

Public Information Request under RCW 42.17A.345 and WAC 390-15-080 D **e** C Tallman Trask <tallman.trask@gmail.com> Sun, Oct 27, 2:51 PM (3 days ago) to privacy, sales 🕶 To Whom It May Concern As you may be aware, commercial advertisers who sell political advertising related to Washington state campaigns are required to make certain specified information available for public inspection Recently campaign finance disclosures filed in Washington indicated that Choozle sold at least \$11,300 in political ads to a company doing business as Western Consultants, LLC which was acting on behalf of a Washington state political committee. These ads appear to have been independent expenditures made in support of two Washington state political campaigns (Egan Orion's campaign for Seattle City Council District 3 and Heidi Wills' campaign for Seattle City Council District 6). I wish to inspect Choozle's records on these ads and any other Washington state political ads Choozle has sold during calendar years 2018 or 2019, as required by RCW 42.17A.345 and WAC 390-15-080. These sections of Washington state law require disclosure of a "description of the demographic information (e.g., age, gender, race, location, etc.) of the audiences targeted and reached, to the extent such information is collected by the commercial advertiser as part of its regular course of business, and the total number of impressions generated by the advertisement of communication" along with "[t]he names and addresses of persons from whom it accepted political advertising or electioneering communications . [t]he exact nature and extent of the services rendered; and . . . [t]he total cost and the manner of payment for the services." The law further requires that these records by made available to any person on request. I request these records be supplied electronically to me at the email address I am currently writing from (<a href="mailto:lallman.trask@gmail.com">lallman.trask@gmail.com</a>). The law requires these records, when requested electronically, be provided "in machine readable format and structured in a way that enables the data to be fully discoverable and useable by the end user" and be provided either on a website maintained by the advertiser (which does not appear to exist in this case) or "[b]y digital transmission, such as email, promptly upon request," As these ads were sold in relation to a 2019 election, and election day is approaching quite quickly, I request that Choozle supply these records as quickly as is possible and no later than November 4, 2019 If neither the sales nor privacy contacts are able to handle this request, please forward my request and contact information to Choozle's legal or compliance team

As of October 30, 2019, I have received no response to my email. While it is possible that Choozle will respond to my email prior to the November 4 date included in my email, the lack of response from

Choozle appears to potentially be in violation of at least the "promptly, upon request" requirements in both WAC 390.

Thank you for your continued work on this,

Tallman Trask