



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
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**Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

January 6, 2020

Delivered electronically to Anna Rohrbough at "info@electanna.com"

Subject: Complaint filed by Hillary Moralez, PDC Case 59707

Dear Ms. Rohrbough:

Below is a copy of an electronic letter sent to Hillary Moralez concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Hillary Moralez, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of including full sponsor identification on written political advertisements, including the name and mailing address of the sponsor. PDC staff expects in the future that you will include sponsor identification on political advertisements in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

Jennifer Hansen  
Compliance Officer

Endorsed by,

/s

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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January 6, 2020

Delivered electronically to Hillary Moralez at “hillary.moralez@gmail.com”

Subject: Complaint regarding Anna Rohrbough, PDC Case 59707

Dear Hillary Moralez:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 30, 2019. The complaint alleged that Anna Rohrbough, a candidate for Snohomish County Council, Position 2 in 2019, may have violated: (1) RCW 42.17A.555 for misuse of public facilities by using a county sheriff’s ride-along event to benefit her 2019 election campaign; and (2) RCW 42.17A.320 for failure to include complete sponsor identification in online political advertisement paid for by the 2019 campaign.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; PDC Interpretation 04-02; and the response provided by Anna Rohrbough, to determine whether the record supports a finding of one or more violations.

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

- Anna Rohrbough (Campaign to Elect Anna Rohrbough) filed a Candidate Registration (C-1 report) on February 25, 2019, declaring her candidacy for Snohomish County Council, Position 2 in 2019, and choosing the “Full Reporting” option.
- Ms. Rohrbough is a current council member for the City of Mukilteo after being elected in 2017.

Allegation 1: Violation of RCW 42.17A.555 for misuse of public facilities by using a county sheriff’s ride-along event to benefit the 2019 Campaign to Elect Anna Rohrbough.

- On October 13, 2019, Anna Rohrbough participated in a ride-along with a Snohomish County Sheriff’s deputy.
- RCW 42.17A.555 prohibits the use of public facilities to support or oppose candidates, including county equipment and staff time.
- The Commission adopted PDC Interpretation 04-02, *Guidelines for Local Government Agencies in Election Campaigns*, which provides information concerning the use of public facilities including activities that are permitted or prohibited, activities which are part of the “normal and regular conduct” of the county equipment, permissible activities of local elected officials, staff, and other general considerations.
- The complaint included a copy of an advertisement sponsored by the Campaign to Elect Anna Rohrbough and posted on October 14, 2019. In the advertisement, Ms. Rohrbough recounts her experience during the ride-along.

- The complaint alleged that Ms. Rohrbough used her ride-along experience to benefit her 2019 election campaign for Snohomish County Council.
- In her response, Ms. Rohrbough stated that during the ride-along she did not speak to any of the deputies, correction officers or other law enforcement officers about her 2019 campaign and that when she was introduced, her title as a current Mukilteo City Councilmember was used. She further stated that the photographs used in the advertisement were her own and were taken in public places.
- Staff confirmed with Snohomish County that requests for ride-alongs with sheriff's office personnel can be made by any member of the public.

Allegation 2: Violation of RCW 42.17A.320 for failure to include the name and address in online political advertisements paid for by the 2019 Campaign to Elect Anna Rohrbough.

- Between September 24, 2019 and October 28, 2019, the Campaign to Elect Anna Rohrbough sponsored six separate online political advertisements that appeared in the Everett Herald's online site, HeraldNet. All six of the advertisements were identified as political advertisement sponsored by the campaign and included the message "*PDC – Paid for by the Campaign to Elect Anna (R). For more information electanna.com*" at the close of the ad.
- RCW 42.17A.320 requires that, unless otherwise exempt, all written political advertisement shall include the sponsor's name and address.
- The complaint alleged that the online advertisements did not include proper sponsor identification.
- In her response, Ms. Rohrbough stated that the ads were purchased by her campaign and that she believed they contained the required sponsor identification.

The complaint included an additional allegation regarding a possible breach of the signed contract Ms. Rohrbough agreed to when participating in the ride-along related to the use of what she observed during the event. Apart from the portion of the ride-along event resulting in a possible violation of RCW 42.17A.555, staff found this allegation to be outside of the PDC's jurisdiction and did not address this part of the complaint.

Anna Rohrbough is a current elected official and was a candidate for a separate county-wide office in 2019. It appears that her failure to disclose a complete sponsor identification for online political advertisement sponsored by her campaign, was due to a misunderstanding the applicable statute. Sponsor identification is used to inform the public who has paid for or sponsored a political advertisement. Although the half dozen online advertisements referenced above did not contain the mailing address of the sponsor required in RCW 42.17A.320, the sponsor was still clearly identified as the 2019 Campaign to Elect Anna Rohrbough.

Staff found no evidence to prove that Ms. Rohrbough used the ride-along event to support her campaign. Ms. Rohrbough responded promptly to the complaint and has not previously been found in violation of PDC laws or rules.

Based on these findings staff has determined that, in this instance, failure to include complete sponsor identification in online advertisements paid for by the candidate's campaign, does not amount to a finding of a violation warranting further investigation.

PDC staff is reminding Anna Rohrbough about the importance of including sponsor identification, including the name and address of the sponsor, as required on written political advertisements in accordance with the statutes and rules.

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 Jennifer Hansen at 1-360-586-4560, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

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Jennifer Hansen  
Compliance Officer

Endorsed by,

/s

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Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Anna Rohrbough