

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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

January 23, 2024

Delivered electronically to Weisi Amanda Li

Subject: Complaint filed by Carol A. Simpson, PDC Case 144426

Weisi Amanda Li,

Below is a copy of an electronic letter sent to Carol A. Simpson concerning the complaint she filed on October 27, 2023, against your Campaign for Newcastle City Council in 2023. Specifically, the complaint alleged a violation of RCW 42.17A.320 for a joint candidate mailer that supported four candidates for Newcastle City Council, including you, Tom Griffin, Steve Tallman, Len Trautman, but failed to include the required sponsor identification information for the candidates.

As noted in the letter to Ms. Simpson, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and WAC 390-37-060(1)(a).

However, PDC staff is reminding you to include the proper sponsor identification on all future political advertisements, including your name and complete mailing address in which you are appearing as a candidate. As in this case, if you do not use Campaign or personal funds to pay for the advertisement or your full portion of the content of the advertisement, be sure to include the words "Sponsored by" followed by your name and mailing address for the information featuring your candidacy in which you are provided the content.

If you have questions, you may contact PDC staff member Kurt Young by e-mail at pdc@pdc.wa.gov

Sincerely,	Endorsed by:
s/	s/
Electronically Signed Kurt Young,	Electronically Signed Kim Bradford, Deputy Director
Compliance Officer	For Peter Frey Lavallee, PDC Executive Director





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January 23, 2024

Delivered electronically to Carol A. Simpson

Subject: Complaint regarding Weisi Amanda Li, PDC Case 144426

Carol A. Simpson:

The Public Disclosure Commission (PDC) has completed its review of the complaint filed by you on on October 27, 2023, against Amanda Li, a 2023 candidate for Newcastle City Council in 2023. Specifically, your complaint alleged that a joint candidate mailer that supported and provided content for four candidates seeking election to the Newcastle City Council in 2023 (Tom Griffin; Steve Tallman; Len Trautman; and Ms. Li) violated RCW 42.17A.320 for failing to contain the proper sponsor identification on the mailer for all four candidates, including the candidates' names and complete mailing addresses.

PDC staff reviewed the complaint, allegation(s), and joint candidate mailer provided as an exhibit; the statutes, rules, and PDC advice concerning sponsor identification requirements for political advertising; and the campaign finance reports and response from Ms. Li, to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- On May 23, 2023, Weisi Amanda Li filed a Candidate Registration declaring her candidacy for City Councilperson for the City of Newcastle, Position #2, initially selecting the Full Reporting Option and listing herself as Campaign Treasurer. Ms. Li was a first-time candidate seeking public office in 2023.
- On October 26, 2023, Ms. Li filed an amended Candidate Registration changing from the Full Reporting Option to the Mini Reporting Option.
- RCW 42.17A.320 requires the sponsor identification, including the candidate's name and complete mailing address to appear on political advertisements such as direct mail, TV and radio broadcast advertisements, and social media advertisements. In addition, if the direct mail advertisement is sponsored by multiple candidates, the sponsor identification must include all candidate names and their complete mailing addresses.
- Ms. Li stated in her response that the joint four-candidate mailer "was designed by a third party" and included information about all four candidates "running in this election with similar ideals." She stated the information had been provided by Mr. Trautman, Mr. Griffin, Mr. Tallman, and her Campaign, and was taken from information that had previously been included in each candidate's own "individual flyers."
- Ms. Li stated that when the final draft of the mailer was shared with her, she informed the other three candidates that she didn't have the funds to pay for her pro-rata share. She stated that rather than redesigning the mailer to exclude her candidate information, the other three "candidates kindly offered to split the costs for the printing and postage 3 ways between themselves without my financial input."

- Ms. Li stated the three candidates wanted to include her candidate information in the "mailer to show group unity." She stated that the three candidates, Mr. Trautman, Mr. Griffin, and Mr. Tallman, each paid 1/3 of the costs for the mailer, that she was not involved in finalizing the mailer, and did not make an expenditure or payment for the mailer.
- Ms. Li stated that she confirmed with all three candidates that they explained the mailer to Ms. Simpson and showed "her their... receipts clearly showing their 3 way pro rata share of the cost."
- The other three candidates were all under the Mini Reporting Option, which did not require any itemized campaign finance reports to be filed, including Monetary Contributions reports (C-3 reports), and Ms. Li changed to the Mini Reporting Option on October 26, 2003. It was not possible for PDC staff to ascertain based on the available records if the three candidates paid for Ms. Li's portion using personal or campaign funds, since no campaign finance reports are filed by candidates under Mini Reporting.
- Based solely on Ms. Li's response, she indicated that she did not pay for her portion of the mailer so the "Paid for by" sponsor identification did not require her name to be included, unless it stated the words "Sponsored by" since the content for her portion of the mailer was provided by her Campaign.

PDC staff did not find any evidence of a violation that would require conducting a further review or investigation into the complaint allegation or pursuing any enforcement action in this instance. Based on this information, the PDC finds that no action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1) and WAC 390-37-060(1)(a).

PDC staff is reminding Ms. Li to include the proper sponsor identification on all future political advertisements, including her name and complete mailing address in which she is appearing as a candidate. As in this case, if Ms. Li does not use Campaign or personal funds to pay for any future advertisements featuring her, that she not include the words "Paid for by" followed by her name. Staff recommends that Ms. Li include the words "Sponsored by" followed by her name and mailing address for the information in which she provided the content.

If you have questions, you may contact PDC staff member Kurt Young by e-mail at pdc@pdc.wa.gov

Sincerely, End	dorsed by:
• •	ectronically Signed Kim Bradford, Deputy Director r Peter Frey Lavallee, PDC Executive Director



cc: Weisi Amanda Li