



State of Washington
PUBLIC DISCLOSURE COMMISSION

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(360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

Memorandum

To: Public Disclosure Commission

From: Alice Fiman, Compliance Officer

Date: October 21, 2024

Subject: Enforcement Hearing Memorandum: PDC Case 157884

Allegations:

PDC staff alleges that TikTok, owned by ByteDance, violated 42.17A.345 and WAC 390-18-050 by failing to provide inspection of its commercial advertiser books of account. TikTok is a social media platform that allows users to create, edit and share short videos.

Background:

- On July 25, 2024, the Public Disclosure Commission received a complaint from Conner Edwards alleging TikTok failed to respond to a request to review its commercial advertising books of account as required by RCW 42.17A.345 and WAC 390-18-050. [Exhibit 1]
- PDC staff sent the complaint to advertise@bytedance.com; compliance_wa_tiktok@multistate.us; press@bytedance.com and hr@bytedance.com on Aug. 8, 2024, and requested a response by Aug. 22, 2024.
- While awaiting a response, PDC staff replied to Edwards that PDC staff found TikTok states on its website that company policy is to not accept political advertising. Staff requested Edwards provide evidence that the company accepted political advertising by entities regulated by the PDC. [Exhibit 2]

- In response, Edwards provided a list of three expenditures made to TikTok by candidates registered with the PDC. **[Exhibit 3]**
- PDC staff contacted Jason Moon, a candidate for Washington State House of Representatives from the 21st District, who confirmed the two expenditures, stating on Aug. 9, 2024 they paid to boost two posts on TikTok. PDC staff was able to capture a screen shot of one possible advertisement. **[Exhibit 4]**
- TikTok, via its legal counsel Alexandra Langton, responded to the PDC on Aug. 22, 2024, stating, the PDC should dismiss the complaint because...“TikTok is not a “commercial advertiser” required to maintain or provide public inspection of books of account or related materials, as defined by the statute.”...**[Exhibit 5]**
- When presented with evidence of Moon’s paid advertisements on TikTok, Langton responded on Oct. 1, 2024 stating, in part, that Moon violated TikTok’s policies. **[Exhibit 6]**
- On Oct. 2, 2024, PDC staff then requested TikTok reply to Conner Edwards, providing the records required by RCW 42.17A.345. **[Exhibit 7]**
- Langton responded on Oct. 7, 2024, that the company maintains it “is not a commercial advertiser in Washington state.” **[Exhibit 8]**
- PDC staff sent a notice via email and U.S. Mail of a Brief Adjudicative Proceeding (a Brief Enforcement Hearing Notice) to TikTok via its legal counsel on Oct. 15, 2024. **[Exhibit 9]**

Laws and Rules:

Commercial advertisers who accept or provide political advertising or electioneering communications must maintain certain records including information about the advertising they sell. These records, called “books of account”, must be open to public inspection during normal business hours during the campaign and for at least five years after the election.

RCW 42.17A.005 Definitions

(10) “Commercial advertiser” means any person that sells the service of communicating messages or producing material for broadcast or distribution to the general public or segments of the general public whether through brochures, fliers, newspapers, magazines, television, radio, billboards, direct mail advertising, printing, paid internet or digital communications, or any other means of mass communications used for the purpose of appealing, directly or indirectly, for votes or for financial or other support in any election campaign.

42.17A.345: Commercial advertisers—Public inspection of documents—Copies to commission.

(1) Each commercial advertiser who has accepted or provided political advertising or electioneering communications during the election campaign shall maintain current books of account and related materials as provided by rule that shall be open for public inspection during normal business hours during the campaign and for a period of no less than five years after the date of the applicable election. The documents and books of account shall specify:

- (a) The names and addresses of persons from whom it accepted political advertising or electioneering communications;
- (b) The exact nature and extent of the services rendered; and
- (c) The total cost and the manner of payment for the services.

WAC 390-18-050 Commercial advertisers—Public inspection of records.

- (1) “Commercial advertiser” as that term is used in the act and these rules is defined under RCW 42.17A.005.
- (4) Until such time as the PDC provides an open access platform on its website for this information, which will replace the following methods of inspection for all required information, such information must be available for public inspection by any person...

Aggravating and Mitigating Factors:

Aggravating:

- Impact on the public: the advertisement(s) were posted during the time sensitive period prior to the 2024 Primary Election
- Corrective action or other remedial measures: the respondent failed to respond or remediate when requested by PDC staff.
- Good faith efforts to comply: the respondent has refused to comply and has demonstrated no wish to acknowledge and take responsibility for the violation;
- Sophistication of respondent: the respondent is an international social media company with significant resources

Mitigating:

- The amount of financial activity by the respondent during the statement period or election cycle: as noted in the evidence, there is minimal activity
- Whether the late or unreported activity was significant in amount or duration under the circumstances, including in proportion to the total amount of expenditures by the respondent in the campaign or statement period: as noted, there is minimal activity
- The respondent's compliance history for the last five years: there are no other PDC complaints within the last five years.

Staff Recommendation:

Brief enforcement hearings (brief adjudicative proceeding)—Penalty schedule. Failure to comply with other political advertising requirements, RCW 42.17A.330 through 42.17A.345.

The presiding officer may assess a penalty up to one thousand dollars upon finding a violation of chapter 42.17A RCW or Title 390 WAC.

- (1) Base penalty amounts: 1st Occasion: \$150 for violations cured by hearing date.

“Occasion” means established violation. Only violations in the last five years will be considered for the purpose of determining second and third occasions.

Exhibit List:

- **Exhibit 1** – July 25, 2024 Complaint to PDC from Conner Edwards
- **Exhibit 2** – Request from PDC for Edwards to provide additional evidence
- **Exhibit 3** – Additional evidence from Conner Edwards
- **Exhibit 4** – Information from candidate Jason Moon and screenshot of Moon's Aug. 2, 2024 TikTok
- **Exhibit 5** – Aug. 22, 2024 response from TikTok
- **Exhibit 6** – Oct. 1, 2024 response from TikTok
- **Exhibit 7** – PDC request to TikTok to cure and provide the records to Edwards
- **Exhibit 8** – Oct. 7, 2024 response from TikTok
- **Exhibit 9** – PDC hearing notice to TikTok

Exhibit 1

Respondent Names
ByteDance
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards</p> <p>Thu, 25 Jul 2024 at 2:19 PM</p> <p>Description of Complaint</p> <p>On 7/18/24, I sent a request to inspect ByteDance/TikTok's commercial advertising books of account. See attachment.</p> <p>I never received a response.</p>
What impact does the alleged violation(s) have on the public?
Inability for members of the public to see which campaigns are spending money on TikTok advertisements.
List of attached evidence or contact information where evidence may be found
See attached.
List of potential witnesses with contact information to reach them
See attached.
Certification (Complainant)
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.



Conner Edwards <cg.edwards53@gmail.com>

RCW 42.17A.345 Request (TikTok)

Conner Edwards <cg.edwards53@gmail.com>

Thu, Jul 18, 2024 at 5:46 PM

To: press@bytedance.com, hr@bytedance.com, advertise@bytedance.com

Hello:

Per RCW 42.17A.345, I am requesting to view your (TikTok's) commercial advertising books of account.

See link for additional information: <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/commercial-advertiser-disclosure-guide> .

Please let me know if you need additional information from me to process this request.

Best,

Conner Edwards
(425) 533-1677 cell

Exhibit 2

Alice Fiman replied 2 months ago (Fri, 9 Aug 2024 at 10:38 AM)

To:cg.edwards53@gmail.com

Conner Edwards,

Within the investigation and review of additional contact information for the company, it was brought to our attention

ByteDance/Tiktok has a policy to not accept political advertising:

<https://ads.tiktok.com/help/article/tiktok-ads-policy-politics-religion-and-culture>

Before we move forward further with this case, it is requested you provide evidence of political advertising on this platform by entities regulated by the PDC.

Please provide this by COB on August 13, 2024.

Thank you,

Alice Fiman, PDC

Exhibit 3

Conner Edwards replied 2 months ago (Fri, 9 Aug 2024 at 10:45 AM)

To:"PDC Support" <pdcc@pdc.wa.gov>

External Email

Thanks Alice. See attached.

Also note: I believe that there are likely additional candidates/committees that have placed digital advertising with TikTok but because these expenditures fall below the \$200 they are not itemized and do not show up on the PDC's expenditure search function.

Please let me know if the agency is refusing to process this complaint.

Expenditures

Search expenditures by all candidates and political committees since 2007. Campaigns are required to itemize any expense of more than \$50. Donated goods and services (known as in-kind contributions) also appear as expenditures, with the contributor listed in the recipient column.

Results for:

Recipient Name: tiktok X

^ Hide Filters Search Tips

Candidate/Committee Name

Enter text

X

Election Year

Select

X

Campaign Type

Select

X

Recipient Name

tiktok

X

Expenditure Date

From

To

X

Amount

X

City

X

State

X

Description

X

Show entries[Download 4 rows as CSV.](#)

Candidate/Committee Name ▲	Election year ▼	Campaign Type ◆	Recipient Name ◆	Expenditure Date ◆	Amount ▼	Desc
Jason Moon	2024	Candidate	Tiktok	07/08/2024	\$24.00	Tikto adve
Jason Moon	2024	Candidate	Tiktok	07/22/2024	\$24.00	TikTo Pron Mark
Philip D Fortunato (PHILIP FORTUNATO)	2022	Candidate	TIKTOK	05/13/2022	\$350.00	Paid WAS SOC CON Digit 5/14

Candidate/Committee Name ▲	Election year ▼	Campaign Type ◆	Recipient Name ◆	Expenditure Date ◆	Amount ▼	Desc
Philip D Fortunato (PHILIP FORTUNATO)	2022	Candidate	TIKTOK	05/05/2022	\$300.00	Paid WAS SOC CON Digit - 5/9

Showing 1 to 4 of 4 entries (filtered from 1,128,801 total entries)

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Exhibit 4

Alice Fiman added a private note 2 months ago (Fri, 9 Aug 2024 at 11:53 AM)

received call back from Jason Moon - he did pay to boost two videos on TikTok. He says he is not all that familiar with TikTok and doesn't know if his personal page is a 'politician' page but they were ads - they had 'vote for' in the hashtags and also he thinks he says support or vote for in the video.

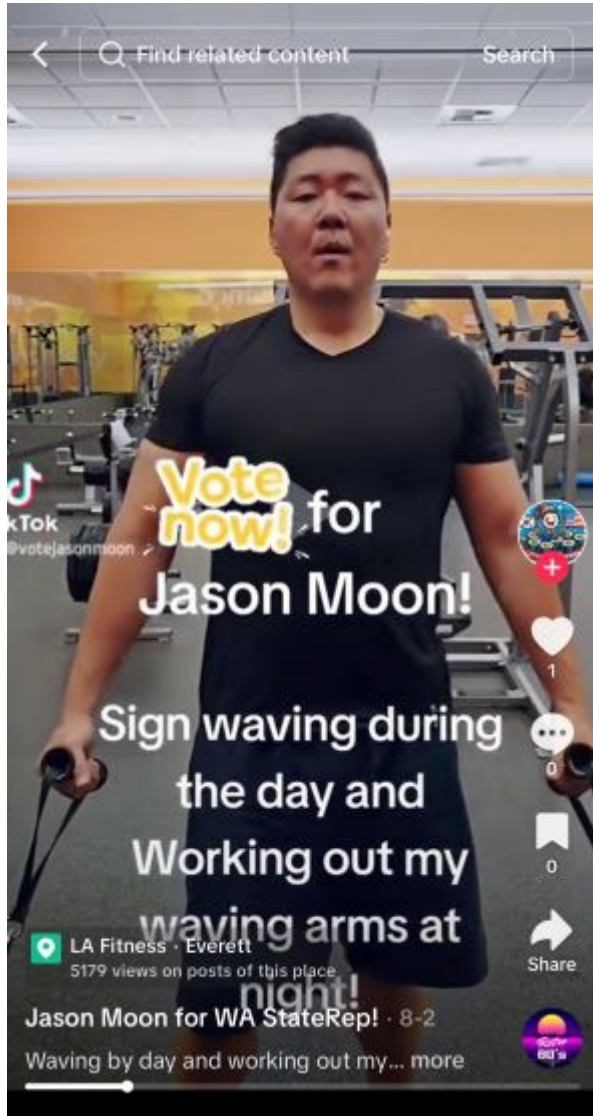


Exhibit 5

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BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
PALO ALTO SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Robert K. Kelner

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5503
rkelner@cov.com

By Email

August 22, 2024

Alice Fiman
Compliance Officer
Washington Public Disclosure Commission
Evergreen Plaza, 711 Capitol Way S #206
Olympia, Washington 98504

Re: TikTok Inc. (Case No. 157884)

Dear Ms. Fiman:

On behalf of our client, TikTok Inc. (“TikTok”), this letter responds to your August 8, 2024, email regarding a complaint filed by Conner Edwards against TikTok. Mr. Edwards alleges that TikTok violated RCW 42.17A.345 and WAC 390-18-050 by failing to provide inspection of TikTok’s commercial advertiser books of account. The Public Disclosure Commission (“Commission”) should dismiss the complaint as unfounded or frivolous because TikTok is not a “commercial advertiser” required to maintain or provide public inspection of books of account or related materials, as defined by the statute.

RCW 42.17A.345 and WAC 390-18-050 require “commercial advertisers” to maintain and provide public inspection of books of account and related materials. RCW 42.17A.005(10) defines a “commercial advertiser” as

any person that sells the service of communicating messages or producing material for broadcast or distribution to the general public or segments of the general public whether through brochures, fliers, newspapers, magazines, television, radio, billboards, direct mail advertising, printing, paid internet or digital communications, or any other means of mass communications used for the purpose of appealing, directly or indirectly, for votes or for financial or other support in any election campaign.

As a matter of policy, TikTok does not sell or produce political content in advertising on its platform. TikTok’s policy regarding political content in advertisements is publicly available at <https://ads.tiktok.com/help/article/tiktok-ads-policy-politics-religion-and-culture>. In relevant part, the policy provides, “[w]e do not allow featuring political content in any form of advertising, extending this prohibition to both members of political organizations and non-political advertisers expressing political views.” The policy specifies examples of content that TikTok does not permit in advertisements: “[c]andidates, nominees, and elected or appointed government officials for public office at the federal, national, state, provincial, and local levels . . . ,” “Political Action Committees (PACs),” “[p]olitical parties,” and “[r]eferences to an

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August 22, 2024
Page 2

election, including voter registration, voter turnout, and appeals for votes, such as ads that encourage people to vote.”

Because TikTok does not sell the service of communicating messages or producing material for broadcast for the purpose of appealing for votes or support in any election campaign, it is not a commercial advertiser, as defined by the statute. Accordingly, TikTok is not required to maintain or provide public inspection of commercial advertiser books of account or related materials, pursuant to RCW 42.17A.345 and WAC 390-18-050. For these reasons, the Commission should dismiss the complaint.

Please let us know if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'RKH', with a long horizontal flourish extending to the right.

Robert K. Kelner
Alexandra Langton

Exhibit 6

Alice Fiman replied 2 months ago (Thu, 22 Aug 2024 at 10:34 AM)

To:alangton@cov.comCc:rkelnr@cov.com

Alexandra Langton,

Thank you for the response. It has been posted to our website. In researching the allegations, we were able to identify one candidate who reported an expenditure to TikTok for the 2024 election cycle. I spoke with the candidate, and he did indicate he bought political advertising from TikTok.

Please provide some information about how this could have happened based on your response to the complaint. The candidate is Jason Moon and I believe his TikTok user name is votejasonmoon.

Thank you,

Alice Fiman, PDC

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Robert K. Kelner

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One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5503
rkelner@cov.com

By Email

October 1, 2024

Alice Fiman
Compliance Officer
Washington Public Disclosure Commission
Evergreen Plaza, 711 Capitol Way S #206
Olympia, Washington 98504

Re: TikTok Inc. (Case No. 157884)

Dear Ms. Fiman:

On behalf of our client, TikTok Inc. (“TikTok” or “the Company”), this letter responds to your August 8, 2024, email regarding a complaint filed by Conner Edwards¹ against TikTok and your August 22, 2024, email regarding a TikTok user (“the user”) who reported making an expenditure to TikTok in connection with his candidacy for the Washington State Legislature.

I. Factual Background

As indicated in the Company’s August 22, 2024, correspondence with the Commission, TikTok prohibits political advertising, paid political promotion, or fundraising by politicians and political parties on its platform as a matter of policy.² TikTok policy further requires that Government, Politician, and Political Party Accounts (“GPPPA”) in the United States to have a verified badge, which the user must apply for. The verification and labeling of a GPPPA enables TikTok to apply relevant policies to such GPPPA’s, such as the automated removal of users’ access to advertising features, including the advertising tool, “Promote.”³ In addition, TikTok’s policies, which are publicly available, make clear that no GPPPA is permitted to use such promotional tools.⁴

¹ TikTok, Inc. is the registered lobbyist employer, but Mr. Edwards’ initial request to review records that prompted the complaint was sent to ByteDance, not TikTok, mailboxes.

² See TikTok Ads Policy at <https://ads.tiktok.com/help/article/tiktok-ads-policy-politics-religion-and-culture> and the Civic and Election Integrity section of the TikTok Community Guidelines <https://www.tiktok.com/community-guidelines/en/integrity-authenticity#2>

³ Verified GPPPA’s automatically have their access to advertising features, including Promote, turned off. See TikTok Policy for Political Accounts, available at <https://newsroom.tiktok.com/en-gb/updating-policies-for-political-accounts>.

⁴ See TikTok Policy for Government, Politician, and Political Party Accounts, available at <https://support.tiktok.com/en/using-tiktok/growing-your-audience/government-politician-and-political-party-accounts>

TikTok has identified two expenditures by the user during the user's candidacy for the Washington State Legislature. The user violated TikTok's policies and misused the platform.⁵ Specifically, the user did not follow the required verification process for GPPPA accounts. The user impermissibly used the Promote feature for political content. Nevertheless, the Company has automated content moderation controls in place to identify impermissible uses of the Promote feature, even without the GPPPA label. The Company's automated review process initially and correctly flagged the user's promoted video for review. However, an error by a human content moderator reviewing the flag permitted the initial content to be posted after the automated review and recall. TikTok takes compliance with its policies very seriously, and it has taken remedial measures, pursuant to its policies. Specifically, TikTok has removed the monetized portion of the initial content from the platform and will provide additional training to its human content moderators. TikTok also implements continuous improvement efforts to ensure future user compliance with its policies and Terms of Service, such as by providing education and training to GPPPA's on advertising restrictions.

II. Legal Analysis

The user's misuse of TikTok's platform does not make TikTok a "commercial advertiser" under Washington law. RCW § 42.17A.005(10) defines a "commercial advertiser" as

any person that sells the service of communicating messages or producing material for broadcast or distribution to the general public or segments of the general public whether through brochures, fliers, newspapers, magazines, television, radio, billboards, direct mail advertising, printing, paid internet or digital communications, or any other means of mass communications used for the purpose of appealing, directly or indirectly, for votes or for financial or other support in any election campaign.

TikTok does not "*sell* the service" of communicating messages or producing material "*for the purpose*" of "appealing for votes or for financial or other support in any election campaign." Rather, TikTok's policies expressly prohibit the provision of any such service to its users. As a matter of law, the misuse of the platform, in violation of the Company's policies, does not change the nature of the advertising services that TikTok offers on its platform. Moreover, TikTok is taking remedial measures to help ensure that users are not able to misuse the platform in the future. Because TikTok is not a commercial advertiser under RCW § 42.17A.005(10), it is not required to maintain or provide public inspection of commercial advertiser books of account or related materials, pursuant to RCW 42.17A.345 and WAC 390-18-050. Even if TikTok were a

⁵ By accessing or using the TikTok application, users agree to comply with TikTok's Terms of Service and Community Guidelines. See TikTok's Terms of Service, available at <https://www.tiktok.com/legal/page/us/terms-of-service/en>. The Civic and Election Integrity section of the Company's Community Guidelines clearly indicates that TikTok does not allow paid political promotion, political advertising, or fundraising by politicians and political parties. See TikTok Community Guidelines, available at <https://www.tiktok.com/community-guidelines/en?lang=en>.

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October 1, 2024

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commercial advertiser, the Commission should decline to pursue the complaint against TikTok because TikTok has made a good faith effort to comply with Washington law and to prohibit political advertising on its platform. The Commission has broad discretion to decline to act when enforcement is unwarranted. *See* WAC 390-37-060, -061. For these reasons, the Commission should dismiss the complaint.

Please let us know if you have any additional questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Kelner', with a stylized flourish extending from the end.

Robert K. Kelner
Alexandra Langton

Exhibit 7

Alice Fiman replied 19 days ago (Wed, 2 Oct 2024 at 9:23 AM)

To:alangton@cov.comCc:rkelnr@cov.com

Alexandra Langton,

Thank you for the response. It has been posted on our website. Please note:

RCW 42.17A.345 states the following:

“(1) Each commercial advertiser who has accepted or provided political advertising or electioneering communications during the election campaign shall maintain current books of account and related materials as provided by rule that shall be open for public inspection during normal business hours during the campaign and for a period of no less than five years after the date of the applicable election

“At the request of the commission, each commercial advertiser required to comply with subsection (1) of this section shall provide to the commission copies of the information that must be maintained and be open for public inspection pursuant to subsection (1)...”

WAC 390-18-050 further expands on the requirements and timeline for commercial advertisers to allow books of account inspection. Please see WAC 390-18-050 for more information.

If TikTok does not qualify for the extension outlined in WAC 390-18-050(5), the full record for the book of account pertaining to political advertising, as requested by Conner Edwards, is due immediately by email. In this case, please provide Mr. Edwards with the requested material no later than Thursday, Oct. 2, 2024, and also respond to this email letting us know the materials were provided. For more information about what the book of account and related documentation must specify, see RCW 42.17A.345(1) and WAC 290-18-050(6) & (7).

If TikTok qualifies for the extension outlined in WAC 390-18-050(5), it has up to three business days to update the books of account with any missing political advertising. In this case, please respond to this email no later than Monday, Oct. 7 2024, explaining to the PDC how the extension applies to this situation and also provide Mr. Edwards the requested materials, as updated, for the books of account inspection.

Thank you and let me know if you have any question,

Alice Fiman, PDC

Exhibit 8

Alexandra Langton replied

14 days ago (Mon, 7 Oct 2024 at 4:21 PM)

To:"PDC Support" <pdcc@pdc.wa.gov>Cc:rkelnern@cov.com

External Email

Ms. Fiman,

Thank you very much for your response. We indicated the Company's position in our letter of October 1, 2024. As indicated, TikTok is not a commercial advertiser in Washington state. The Company's position has not changed.

Alex

Exhibit 9



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.pdcc.wa.gov

Oct. 15, 2024

PDC Case 157884

ByteDance/TikTok
c/o Robert K. Kelner and Alexandra Langton
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956

Sent electronically to alangton@cov.com

Brief Adjudicative Proceeding (Brief Enforcement Hearing) Notice

Respondent:	ByteDance/TikTok
Hearing/meeting date:	Oct. 29, 2024
Time:	10 a.m.
Place:	Remotely from Olympia Live Audio and Online Transmission
Presiding Officer:	Allen Hayward, Chair , of The Public Disclosure Commission
Authority:	RCW 42.17A and WAC 390

On the above date, the Public Disclosure Commission will hold a Brief Adjudicative Proceeding (Brief Enforcement Hearing) in accordance with RCW 42.17A.110 and RCW 42.17A.755, concerning the allegation ByteDance/TikTok violated 42.17A.345 and WAC 390-18-050 by failing to provide inspection of its commercial advertiser books of account.

Under the Brief Enforcement Hearing rules, the Presiding Officer has the authority to assess a civil penalty in accordance with WAC 390-37-143, a penalty schedule adopted by the Commission (see **Penalty Schedule** [WAC 390-37-143](http://www.pdcc.wa.gov))

You are not required by law to personally attend. However, the PDC recommends that respondents personally appear whenever possible.

Respondent and Complainant Notice Rights:

In accordance with WAC 390-37-060(5), the respondent and complainant are being provided notice 10 days in advance of the hearing. In accordance with WAC 390-37-030, the complainant does not have special standing to intervene in the hearing but may be called as a witness at the discretion of PDC staff. The presiding officer has the discretion to allow comment by a person other than the respondent during their consideration of the complaint. **Any person who wishes to comment should notify staff at least three business days before the proceeding.**

WAC 390-37-030 allows the complainant or any other person to submit documentary evidence and/or written factual or legal statements to the staff at any time up to and including the fifth calendar day before the date of any enforcement hearing or proceeding.

If there are materials you wish to have considered at the Brief Enforcement Hearing, you may attend the hearing in person, participate by telephone, remotely or submit written materials addressed to the Presiding Officer. Any written materials you choose to provide in advance of the Brief Enforcement Hearing should describe the facts of your case and any circumstances or mitigating factors you would like the Presiding Officer to consider.

SUBMITTING REPORTS

You are strongly encouraged to complete and submit required reports online prior to the Brief Enforcement Hearing so it is received by the PDC no later than **Oct. 22, 2024**. The report must be submitted electronically.

If you plan on participating at the Brief Enforcement hearing or have questions about the hearing process, please contact PDC Staff by email at pdc@pdc.wa.gov and reference your case number **157884** in the subject line of the email.

Sincerely,

Alice Fiman
Compliance Officer
Toll free 1-877-601-2828

SUBMITTING WRITTEN MATERIALS

In advance of the Brief Enforcement Hearing, you may provide a written response describing the facts of your case for consideration by the Presiding Officer, including any circumstances or mitigating factors you would like considered. Please submit your written response so it is received by the PDC no later than **Oct. 22, 2024**.

PARTICIPATING IN THE HEARING VIA MICROSOFT TEAMS

The Brief Enforcement Hearing will be audio and video recorded. The Presiding Officer and PDC Staff will attend remotely via Microsoft Teams videoconferencing platform.

- **PLEASE READ the entire instructions below *prior to the day of the hearing if you plan to participate via MS Teams.***

Please note that you may be prompted to download the MS Teams app or use a supported browser (Microsoft Edge or Google Chrome) for best performance.

Anyone wishing to participate in the hearing remotely must follow the instructions below and join the meeting on a computer or mobile app. Please remain in the meeting until the Presiding Officer calls your name and case number. After your case has been heard, you may leave or stay in the meeting.

Please note that you must stay muted at all times except while your case is being heard.

[Join on your computer or mobile app](#) (clickable link)

If you are unable to use Teams or experience technical difficulties, please call the PDC's main number 1-360-753-1111 to obtain information regarding alternate participation by telephone. you. If you choose to participate in the hearing remotely, please be aware that you may be waiting in the queue while cases are being heard and you may have a limited amount of time to speak. If a lengthier response time is needed, please consider submitting written participation materials prior to the hearing (see below).

INTERPRETER

If a party or witness to this proceeding speaks limited English or is hearing-impaired, and needs an interpreter, a qualified interpreter will be appointed at no cost to you. Please inform us at least five business days before the hearing if you require an interpreter for this proceeding and/or translation of its written materials in a language other than English. Please contact us by email at pdcc@pdcc.wa.gov or call us at (360) 753-1111 or 1-877-601-2828 to request an interpreter.