

Respondent Names
Let's Go WA
Complainant Name
Abby Lawlor
Complaint Description
<p>Abby Lawlor reported via the portal 3 days ago (Fri, 11 Oct 2024 at 2:15 PM) Let's Go WA's ads "Pinocchio," "Supposed to Help," and "Need All Four" are posted on the Committee's YouTube page.[1]</p> <p>"Pinocchio" also aired on Fox 13 during the Seahawks – 49ers Game on October 11, 2024.</p> <p>A group of people sitting at tables in a room with windows Description automatically generated All three ads, including the version of "Pinocchio" aired on Fox 13, contain the following Sponsor ID:</p> <p>PAID FOR BY LET'S GO WASHINGTON SPONSORED BY BRIAN HEYWOOD. TOP FIVE CONTRIBUTORS: BRIAN HEYWOOD, BIAW MEMBER SERVICES CORPORATION, STEVE GORDON, LAWRENCE HUGHES, KEMPER HOLDINGS LLC.</p> <p>Under RCW 42.17A.320(6), political advertising costing \$2,000 or more supporting or opposing ballot measures sponsored by a political committee must disclose the Top Five contributors as required by RCW 42.17A.350. See WAC 390-18-010(2)(a). Under RCW 42.17A.350(1), the Top Five contributors are "the five persons or entities making the largest contributions to the sponsor" of \$2,000 or more "during the twelve-month period preceding the date on which the advertisement is initially published or presented to the public." See WAC 390-18-025(1).</p> <p>In addition to disclosing the Top Five contributors, such political advertising must also disclose the Top Three donors of \$2,000 or more that are not political committees to any Top Five contributor that is a political committee. See RCW 42.17A.320(6), .350(2). "[T]he names of those individuals or entities must be displayed in the advertisement alongside the statement 'Top Three Donors to PAC Contributors.'" RCW 42.17A.350(2). See also WAC 390-18-025 (explaining how to identify the top three donors).</p> <p>According to Let's Go WA's PDC filings, from October 10, 2023, to October 9, 2024, the Committee's Top Five contributors were as follows:</p> <ol style="list-style-type: none"> 1. Main Street Matters to Washington (\$1,400,000)

2. BIAW Member Services Corporation (\$525,275.61)

3. Lawrence Hughes (\$500,000)

4. Steve Gordon (\$364,021)

5. Kemper Holdings LLC (\$350,000)

Further, Main Street Matters to Washington is a registered political committee in Washington.[2] According to Main Street Matters to Washington's PDC filings, from October 10, 2023, to October 9, 2024, its top three contributors were as follows:

1. BIAW Member Services Corporation (\$320,000)

2. Steve Gordon (\$300,000)

3. Master Builders Association of King and Snohomish Counties (\$267,000)

Based on the above contributions, Let's Go WA's Sponsor ID for the ads "Pinocchio," "Supposed to Help," and "Need All Four" does not accurately reflect the Top Five contributors to the Committee. Specifically, Let's Go WA wrongly included Brian Heywood as its top contributor while failing to disclose its true top contributor, Main Street Matters to Washington, which has given well over a million dollars to the Committee in the last twelve months. Further, as Main Street Matters to Washington is itself a political committee, Let's Go WA failed to disclose its top three individual contributors as required by the FCPA.

The FCPA fundamentally requires that political advertising disclose who paid for it, and the PDC has closely regulated the disclosure of Top Five and Top 3 contributors. Let's Go WA has failed to comply with this fundamental requirement. The Committee's latest violation of the FCPA has a significant impact on the public because Let's Go WA omitted its top contributor in a series of political ads airing on network television less than a month before the general election. In light of this impact and the Committee's prior violations of the FCPA, Defend Washington asks that this matter be promptly investigated before the General Election.

[1] <https://www.youtube.com/@letsgowashington2957>.

[2] <https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2024-11947>.

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

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

List of potential witnesses with contact information to reach them

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.

*Submitted via www.wapdc.gov
and via e-mail to: pdcc@pdcc.wa.gov*

October 11, 2024

Peter Lavallee
Executive Director
Washington Public Disclosure Commission
711 Capitol Way, Rm. 206
Olympia, WA 98504

Re: Let's Go Washington
BIL File No. 6676-002

Dear Executive Director Lavallee,

I am writing on behalf of Defend Washington to report additional violations of the Fair Campaign Practices Act (FCPA), RCW 42.17A, by Let's Go Washington (Sponsored by Brian Heywood) (Let's Go WA or Committee). In political advertising posted on YouTube and airing on Fox Q13 beginning on October 10, Let's Go WA has failed to accurately list the committee's Top Five contributors and Top Three contributors to PAC contributors as required by RCW 42.17A.320(6) and .350.

Let's Go WA's ads "Pinocchio," "Supposed to Help," and "Need All Four" are posted on the Committee's YouTube page.¹



¹ <https://www.youtube.com/@letsgowashington2957>.



“Pinocchio” also aired on Fox 13 during the Seahawks – 49ers Game on October 11, 2024.



All three ads, including the version of “Pinocchio” aired on Fox 13, contain the following Sponsor ID:

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TOP FIVE CONTRIBUTORS: BRIAN HEYWOOD, BIAW MEMBER SERVICES CORPORATION, STEVE GORDON, LAWRENCE HUGHES, KEMPER HOLDINGS LLC.

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Sincerely,

A handwritten signature in black ink, appearing to read 'aL' or 'AL', with a stylized, cursive-like flow.

Abby Lawlor

Counsel for Defend Washington