



October 28, 2024

Phil Stutzman  
Washington State Public Disclosure Commission  
P.O. Box 40908  
Olympia, WA 98504-0908

***Via Email Only***

RE: Response to PDC Case No. 160776

Dear Mr. Stutzman:

I am responding to you on behalf of Let's Go Washington Sponsored by Brian Heywood (LGW), a political committee registered in Washington State, regarding complaint No. 160776 filed with the Public Disclosure Commission (PDC) on October 14, 2024, by Joe Kunzler (Complainant) alleging violations of RCW 42.17A.320 by LGW with regard to disclosure of sponsor identification in online advertising.

It is unclear from the complaint whether the Complainant is alleging inaccurate, insufficient, and/or missing sponsor identification disclosure within LGW online advertising, particularly related to the disclosure of top five contributor and top three donor to PAC contributor information. Because the accuracy of top five contributor/top three donors to PAC contributors is addressed by LGW in its response to concurrent PDC Case No. 160530, this response will only address the question of whether sponsor identification has been provided, and LGW would direct you to consult its response to Case No. 160530 with regard to top five/top three disclosure.

**All Let's Go Washington advertising cited in the complaint features a  
pathway to sponsor identification information**

The Complainant does not cite any advertising other than "X" posts either posted by the campaign or reposted by third parties. X posts may not qualify as political advertising in that information posted through that platform may be done so at no cost. But to the extent they are advertising, X posts certainly qualify as "small online advertising" as defined in WAC 390-18-030(3).

As a method offered in WAC 390-18-030(3)(b), when a viewer clicks on an X post it takes the viewer to the LGW X homepage. That home page format is determined by X and with only limited editability, but the top of the page features a link to a page on LGW's website where its tweets are reproduced along with full sponsor ID and other required disclosures. See below. This pathway to the disclosures works for every one of the tweets that are part of the complaint.



With this information, it is clear that LGW is using compliance best practices in disclosure of sponsor ID and contributor information and that the top five contributor information is properly displayed, and therefore this complaint should be dismissed.

Thank you, and please contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Brady'.

Dan Brady  
Let's Go Washington Legal Counsel