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|---|
| Respondent Names |
| No On 2124 |
| Complainant Name |
| Dan Brady |
| Complaint Description |
| <u>Dan Brady</u> reported via the portal <i>(Thu, 31 Oct 2024 at 3:19 PM)</i> see attached |
| What impact does the alleged violation(s) have on the public? |
| see attached |
| 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. |



October 31, 2024

Peter Frey Lavalley, Executive Director
Washington State Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

Via Email Only

RE: Violations of RCW 42.17A.320(6), .350 and 390-18-025 by No on 2124 for failure to disclose top five contributors and top three donors to PAC contributors in political advertising

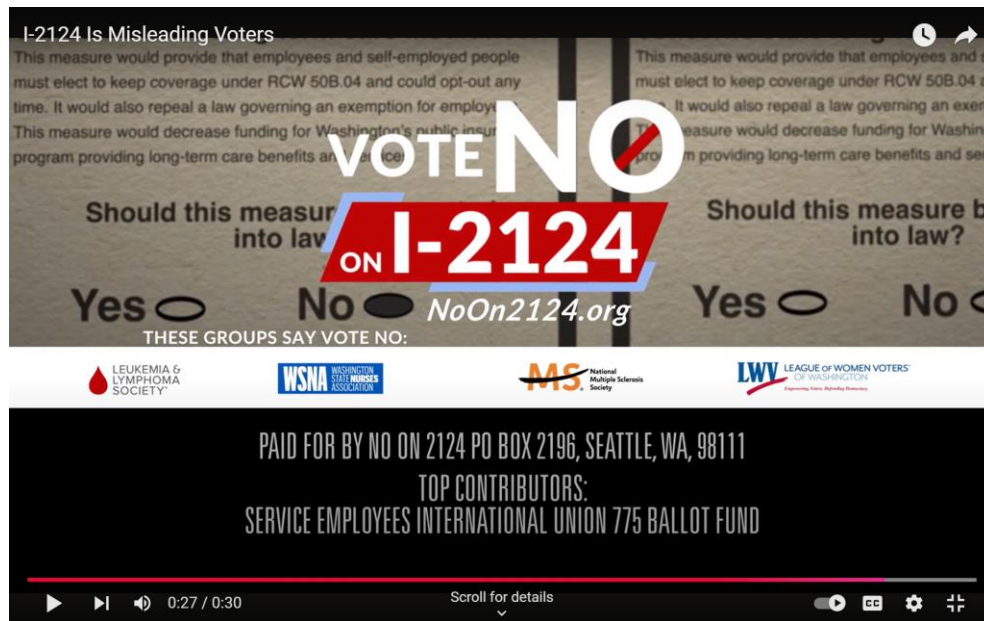
Dear Mr. Lavalley:

I am contacting you on behalf of Let's Go Washington Sponsored by Brian Heywood (LGW), a political committee registered in Washington State, regarding the failure of No on 2124 (the Committee), also a registered political committee in Washington State, to disclose its top five contributors and top three donors to PAC contributors in political advertising resulting in a significant violations of RCW 42.17A.320(6) and .350.

The screenshot below is of an ad that has been playing for more than a week on cable and broadcast TV stations in Washington and is also viewable on YouTube and on the Committee's own website:

You Tube: <https://www.youtube.com/watch?v=7lfboz27NmM>

No on 2124: <https://www.noon2124.org/>



This ad features the following disclaimer:

PAID FOR BY NO ON 2124 PO BOX 2196, SEATTLE, WA, 98111
TOP CONTRIBUTORS:
SERVICE EMPLOYEES INTERNATIONAL UNION 775 BALLOT FUND

RCW 42.17A.320(6) requires advertising supporting or opposing ballot measures valued at more than \$2,000 to disclose the top 5 contributors to the advertising or to the committee sponsoring the advertising, and that the top five contributors are "the five persons or entities making the largest contributions to the sponsor" during the twelve-month period preceding the date on which the advertisement is initially published or presented to the public." WAC 390-18-025(1).

Political committees are also required to 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 using the statement "Top three donors to PAC contributors". RCW 42.17A.320(6), .350(2).

From October 31, 2023, through October 30, 2024, the top five contributors to the Committee were:

1. SEIU Ballot Fund - \$8,020,359.72
2. SEIU 775 - \$4,000,000
3. Service Employees International Union - \$500,000
4. SEIU Local 2015 - \$250,000
5. SEIU Initiative Fund - \$250,000

Peter Frey Lavalley
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In addition, the SEIU Ballot Fund and SEIU Initiative Fund are both PACs. The largest donors to these PAC contributors from October 31, 2023, through October 20, 2024, were:

1. SEIU 775 - \$4,012,015.03
2. SEIU Healthcare 1199NW - \$164,981.03
3. PSE SEIU 1948 - \$100,741.52

With the exception of the SEIU Ballot Fund, all of the top five contributors above and all of the top 3 donors to PAC contributors have been omitted from the advertising when they should be disclosed, denying the ability of the public to see who is paying for the advertising. This discrepancy, which must be intentional given that the disclaimer on the No on 2124 website is almost correct, is particularly egregious considering that more than \$13 million the Committee has spent, nearly all of which is for advertising. <https://www.noon2124.org/>

Given the importance of these missing disclosures and the close proximity to the general election, LGW strongly urges the PDC to investigate this matter as soon as possible.

Thank you, and please contact me with any questions.

Sincerely,



Dan Brady
Let's Go Washington Legal Counsel