



**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.pdca.wa.gov

March 5, 2025

Delivered electronically to Libby Watson (representative for No On 2124) at
libby@noon2124.org and info@noon2124.org

Subject: Complaint filed by Dan Brady, PDC Case 161612

Dear No on 2124:

Below is a copy of an electronic letter sent to Dan Brady concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Dan Brady, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with the political advertisement requirements noted in the complaint. Staff expects the Committee to review all future political advertisements to ensure all required sponsor identification is listed prior to its presentation to the public. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1). Any allegations regarding reporting for the 2024 calendar years not otherwise addressed here are hereby dismissed.

If you have questions, contact Alice Fiman at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

*Electronically signed by
Alice Fiman*

Alice Fiman
Compliance Officer

Endorsed by,

*Electronically signed by Kim
Bradford*

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director



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March 5, 2025

Delivered electronically to Dan Brady at dan@danbradylaw.com

Subject: Complaint regarding No On 2124, PDC Case 161612

Dear Dan Brady:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed Oct. 31, 2024. The complaints alleged that No On 2124, a Political Action Committee registered with the PDC for election year 2024, may have violated RCW 42.17A.320, .350 and WAC 390-18-025 by failing to include complete sponsor ID on political advertisements.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the evidence provided in the complaint, the response provided by the Committee; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff review, we found the following:

- RCW 42.17A.320 requires that all video political advertising supporting or opposing a candidate or ballot proposition includes the sponsor's name and address. RCW 42.17A.350 and WAC 390-18-025 requires a political committee that is not a bona fide party to include its top five contributors' names if the ad qualifies as an independent expenditure, electioneering communication or supports or opposes a ballot measure and the ad or the series of advertisements to which it belongs costs at least \$2,000. In addition, if the top five includes any political committees, the sponsor must also list the top three donors to the political committees.
- The complaints alleged No On 2124 failed to disclose its top five contributors and top three donors on ads viewable on television and YouTube during the 2024 election.
- As noted in the complaint, the videos only list one contributor, not the top five required, and if required, top three.
- In response, Libby Watson, from the No On 2124 committee stated the Committee would correct the disclaimer as soon as possible. It appears the committee did update the advertisements on its website at some point after receiving the complaint.

In this instance, failure to include a complete sponsor identification on written political advertisement does not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, No On 2124 will receive a formal written warning concerning the failure to include complete sponsor identification on political advertisements. The formal written warning will include the expectation the Committee and its members will review all future political advertisements to ensure any includes the required sponsor identification prior to being made available to the general public. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, contact Alice Fiman at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by
Alice Fiman

Alice Fiman
Compliance Officer

Endorsed by,

Electronically signed by
Kim Bradford

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: No on 2124