

Respondent Names
Ampersand Media
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards</p> <p>Fri, 22 Nov 2024 at 11:53 AM</p> <p>Description of Complaint</p> <p>See attached complaint.</p> <p>Notice to Respondent</p> <p>I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff with a so-called "warning letter".</p> <p>This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.</p> <p>What are these shortcomings?</p> <p>Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.</p> <p>I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.</p>

Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/>

If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.

“The journey of a thousand miles begins with a single step.”

— Lao Tzu

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

See complaint. The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency’s failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.

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

See complaint and also PDC website.

List of potential witnesses with contact information to reach them

See complaint and also PDC website.

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.

Complaint Against: Ampersand Media

Submitted: 11/22/24

Notice to Respondent by: 12/2/24 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 2/20/25 per RCW 42.17A.755(3)

Statutes Violated: RCW 42.17A.345, see also WAC 390-18-050

Background

Commercial Advertiser Disclosure Law

Washington state law allows any member of the public to request information about a political advertisement from the company that provided the advertising.¹ These companies are referred to as “commercial advertisers” in the law.

This disclosure, which dates back 50 years to Initiative 276 which created the PDC, is an important counterpart to the reporting done by campaigns and sponsors of independent expenditures. It also provides critical information when sponsors of political advertising fail to identify themselves.

A commercial advertiser is defined as any person or entity that sells a service communicating messages or producing material for distribution to the public, when the message includes an appeal for votes or financial support in an election campaign.

Examples include, but are not limited to, print shops, copying center businesses, direct mail services, billboard companies, broadcasters, print or online publications and online digital platforms. See RCW 42.17A.005(10), RCW 42.17A.345 and WAC 390-18-050.

Violations

On November 19, 2024, I sent an electronic message to the respondent via e-mail requesting to see their commercial advertising books of account. See attached.

I never received a response.

WAC 390-18-050(4)(b)(i) requires that the information required to be maintained by commercial advertisers must be provided “[b]y digital transmission, such as email, promptly upon request, but no later than two business days”.

A list of political expenditures made to the respondent can be found here (also attached):

https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/expenditures?recipient_name=Ampersand&expenditure_date=01%2F01%2F2020-yadcf_delim-11%2F22%2F2024&recipient_state=NY

In total, there were \$1,826,158.82 worth of political expenditures made to this group from 1/1/2020 to present.

¹ <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/commercial-advertiser-disclosure-guide>

Conclusion

The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.

I am filing this complaint with the hopes that the PDC can rapidly bring the respondent into compliance with RCW 42.17A.345.

Best,

Electronically signed Conner Edwards

/s/ Conner Edwards

Complainant

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This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.

What are these shortcomings?

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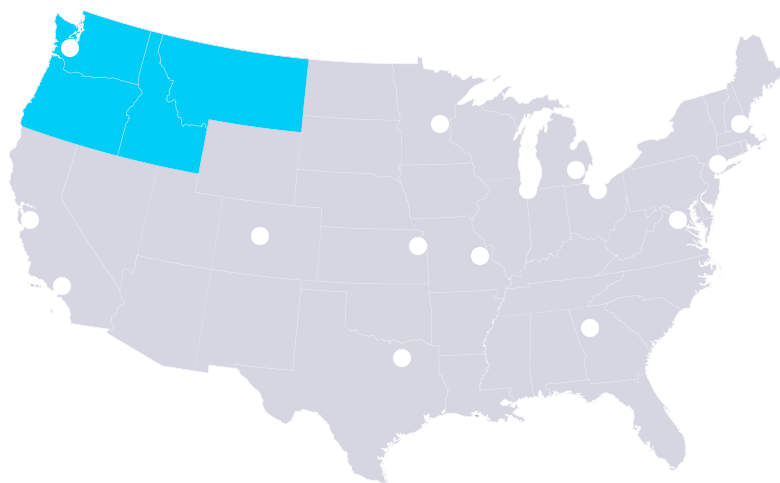
CONTENT

NEWSROOM

CONTACT
US

Find an office near you.

Click on the city in your area.



Seattle

Wendy Lowe

wendy.lowe@ampersand.tv

303.352.2571



Let's connect!

To find out more, to work with us, or to simply stay up to date, we want to hear from you.

Fill out the form, or email us at inquiries@ampersand.tv

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Conner Edwards <cg.edwards53@gmail.com>

RCW 42.17A.345 Book Inspection Request (Ampersand)

Conner Edwards <cg.edwards53@gmail.com>

Tue, Nov 19, 2024 at 11:32 PM

To: wendy.lowe@ampersand.tv, inquiries@ampersand.tv

Hello:

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

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

If you have questions about this request, you should call the PDC @ (360) 753-1111.

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Best,

Conner Edwards
(425) 533-1677 cell**Contact Us - Ampersand.pdf**

376K

filer_name	election_yr	type	recipient_r	expenditur	amount	description	recipient_c	recipient_s url
Defend Wa	2024	Political Cr	Ampersanc	2024-10-0	83583.9	TV Ads 10/	New York NY	https://apc
Defend Wa	2024	Political Cr	Ampersanc	2024-10-0	44565.5	TV Ads 10/	New York NY	https://apc
Defend Wa	2024	Political Cr	Ampersanc	2024-09-2	30114.65	TV Ads 10/	New York NY	https://apc
Defend Wa	2024	Political Cr	Ampersanc	2024-10-2	29140	Ampersanc	New York NY	https://apc
Defend Wa	2024	Political Cr	Ampersanc	2024-10-1	28040	Ampersanc	New York NY	https://apc
Defend Wa	2024	Political Cr	Ampersanc	2024-09-1	11267.6	Ads 9-24 to	New York NY	https://apc
Defend Wa	2024	Political Cr	Ampersanc	2024-10-2	7220.12	Ampersanc	New York NY	https://apc
Defend Wa	2024	Political Cr	Ampersanc	2024-10-2	6420	Ampersanc	New York NY	https://apc
Defend Wa	2024	Political Cr	Ampersanc	2024-10-2	4370	Ampersanc	New York NY	https://apc
No On 212	2024	Political Cr	Ampersanc	2024-10-1	429346.9	TV Ads 10/	New York NY	https://apc
No On 212	2024	Political Cr	Ampersanc	2024-10-2	365467.5	TV Ads 10/	New York NY	https://apc
No On 212	2024	Political Cr	Ampersanc	2024-10-2	197926.1	TV Ads 10/	New York NY	https://apc
No On 212	2024	Political Cr	Ampersanc	2024-10-1	149522.9	TV Ads 10/	New York NY	https://apc
No On 212	2024	Political Cr	Ampersanc	2024-10-1	129943.8	TV Ads 10/	New York NY	https://apc
No On 212	2024	Political Cr	Ampersanc	2024-10-0	86445	TV Ads 10/	New York NY	https://apc
No On 212	2024	Political Cr	Ampersanc	2024-09-2	65620	TV Ads 10/	New York NY	https://apc
No On 212	2024	Political Cr	Ampersanc	2024-09-2	61370	TV Ads 9/2	New York NY	https://apc
No On 212	2024	Political Cr	Ampersanc	2024-10-0	53295	TV Ads 10/	New York NY	https://apc
No On 212	2024	Political Cr	Ampersanc	2024-09-1	42500	TV Ads 9/1	New York NY	https://apc

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