

<b>Respondent Names</b>
Sinclair Broadcasting Group
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<a href="#"><u>Conner Edwards</u></a> reported via the portal <i>(Fri, 9 May 2025 at 12:59 PM)</i>  See complaint.
<b>What impact does the alleged violation(s) have on the public?</b>
See complaint & PDC website.
<b>List of attached evidence or contact information where evidence may be found</b>
See complaint & PDC website.
<b>List of potential witnesses with contact information to reach them</b>
See complaint & PDC website.
<b>Certification (Complainant)</b>
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: KOMO & KUNS (Sinclair)****Submitted:** 5/9/2025**Notice to Respondent Due By:** 5/19/2025 per WAC 390-37-050(1)**90 Day Initial Hearing Deadline:** 8/7/2025 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.<sup>1</sup> 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 January 15, 2025, I e-mailed a request to inspect the books of account for this respondent. No response was received. I e-mailed the respondent on April 22, 2025, with a new request. The respondent eventually responded to my request but only provided records relating to 2024 and 2025. I requested that the records relating to 2020, 2021, 2022, and 2023 be provided but they were not. See attached.

The previous complaint I filed against this respondent was dismissed improperly by PDC staff with the notation that: “no evidence was provided that inspection was refused.” This dismissal was improper because I did include evidence that the inspection had been refused by the respondent’s non-response. This evidence is being resubmitted with this complaint.

In my experience, it is far more common that commercial advertisers refuse the request by simply not responding to the requester. It is relatively rare that commercial advertisers affirmatively deny the requester access to the records. While I sympathize with the desire of PDC staff to minimize their own workload, the agency has a statutory responsibility to enforce the commercial advertiser statute.

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<sup>1</sup> <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 hope that the PDC can rapidly bring the respondent into compliance with RCW 42.17A.345.

/s/ Conner Edwards  
(425) 533-1677 cell

## **Notice to Respondent**

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.

This complaint is one of over one thousand complaints 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?

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.

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.

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.

“Be the change that you wish to see in the world.”  
— **Mahatma Gandhi**



Conner Edwards &lt;cg.edwards53@gmail.com&gt;

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**Seattle-KOMO & KUNS Political Files**

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**Conner Edwards** <cg.edwards53@gmail.com>

Fri, May 2, 2025 at 12:27 PM

To: Jennifer Lopez &lt;jenniferlopez@sbgvtv.com&gt;

Cc: PDC Support &lt;pdcc@pdcc.wa.gov&gt;

Thank you Jennifer: I'm only seeing political ads from 2024 and 2025 here, where are the ads from 2020, 2021, 2022, and 2023?

-Conner

On Fri, May 2, 2025 at 10:57 AM Jennifer Lopez <jenniferlopez@sbgvtv.com> wrote:

Hi Conner,

Video files have been uploaded.

Thank you,

Jen

**Jennifer Lopez**

Director, Sales and Marketing

206.404.3004 (office) | 206.390.5864 (cell)

140 4th Ave N.

Seattle, WA 98109

<https://KOMONEWS.com>



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**From:** Conner Edwards <cg.edwards53@gmail.com>

**Sent:** Tuesday, April 29, 2025 4:55 PM

**To:** Jennifer Lopez <jenniferlopez@sbgvtv.com>; PDC Support <pdcc@pdcc.wa.gov>

**Subject:** Re: [EXT]Re: Seattle-KOMO & KUNS Political Files

Thanks Jennifer.


Unfortunately as I'm looking through this file, I'm not seeing the video files for the advertisements.

Please consider this e-mail as a request to you to update the books of account, per WAC 390-18-050(5).

-Conner

On Tue, Apr 29, 2025 at 4:48 PM Jennifer Lopez <jenniferlopez@sbgvtv.com> wrote:

Hi Conner,

I believe this link has the additional information you are requesting:  WA PDC Political Advertising File.

Thank you,

Jen

**Jennifer Lopez**

Director, Sales and Marketing

206.404.3004 (office) | 206.390.5864 (cell)

140 4th Ave N.

Seattle, WA 98109

<https://KOMONEWS.com>



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**From:** Conner Edwards <cg.edwards53@gmail.com>

**Sent:** Friday, April 25, 2025 2:21 PM

**To:** Jennifer Lopez <jenniferlopez@sbgvtv.com>; PDC Support <pdc@pdc.wa.gov>

**Subject:** [EXT]Re: Seattle-KOMO & KUNS Political Files

**CAUTION:** This email originated from outside of Sinclair. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks Jennifer, however I am requesting the commercial advertising books of account which are much different from the FCC file.

Best,

Conner Edwards

(425) 533-1677 cell

On Fri, Apr 25, 2025 at 12:41 PM Jennifer Lopez <jenniferlopez@sbgvtv.com> wrote:

Conner,

Thank you for your request. Below are the links to the FCC public political files for KOMO and KUNS. Please let me know if you have any further requests.

KOMO: <https://publicfiles.fcc.gov/tv-profile/KOMO-TV>

KUNS: <https://publicfiles.fcc.gov/tv-profile/KUNS-TV>

Thank you,

Jen

**Jennifer Lopez**

Director, Sales and Marketing

206.404.3004 (office) | 206.390.5864 (cell)

140 4th Ave N.

Seattle, WA 98109

<https://KOMONEWS.com>

Hello:

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

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

Please let me know if you need additional information from me to process this request.

If you have any questions about this request, you should contact the PDC immediately at (360) 753-1111

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Best,

Conner Edwards

(425) 533-1677 cell

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(425) 533-1677 cell





Rachel Cristofani > **WA PDC Political Advertising File**

		Name ▾		Modified ⓘ ▾	Modified By ▾	File size
		2024		April 11	Rachel Cristofani	6 items
		2025		April 11	Rachel Cristofani	5 items
		2025 Broadcasters Calendar.pdf		April 11	Rachel Cristofani	50 KB