

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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

August 4, 2025

Subject: PDC Case 176889, Sinclair Broadcasting Group

Sinclair Broadcasting Group:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on May 9, 2025. The complaint alleged violations of RCW 42.17A.345 for failing to timely provide complete commercial advertiser books of account upon request.

Applicable Laws & Rules

RCW 42.17A.345 and WAC 390-18-050 require commercial advertisers to make their documents and books of account open for public inspection during normal business hours for five years following the election to which the records pertain.

Pursuant to RCW 42.17A.345, the documents and books of account shall specify: 1) the names and addresses of persons from whom it accepted political advertising or electioneering communications; 2) the exact nature and extent of the services rendered; and 3) the total cost and the manner of payment for the services. WAC 390-18-050 requires a copy of the advertisement or communication to be included in the information made available for public inspection.

WAC 390-18-050 further states that commercial advertisers can provide such information to the requester in person during normal business hours or by email or online publication.

Background & Findings

- Sinclair Broadcasting Group ("the Respondent") is a commercial advertiser that is listed in PDC expenditure records as providing political advertising services.
- The complainant stated they emailed the Respondent on April 22, 2025, requesting to view the Respondent's commercial advertising books of account.
- Jennifer Lopez, Director of Sales and Marketing, provided the complainant with some of the documents on April 25, 2025. She supplemented that initial production with additional files on April 29, 2025, and May 2, 2025.
- On July 29, 2025, Lopez emailed the complainant again to explain that the company's archival system had not been configured to retain copies of the actual political advertising

Sinclair had provided campaigns for the years 2021, 2022 and 2023. She stated that Sinclair was amending its retention period to match the five-year period required by RCW 42.17A.345.

Summary and Resolution

It appears that, prior to the complaint, you were not fully aware of what records needed to be kept for public inspection. You did respond to the complainant's request with the available information, with the exception of copies of the political advertising for earlier years.

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor. After consideration of the circumstances, further proceedings would not serve the purposes of this chapter. Under WAC 390-37-060, the executive director, at any time prior to consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted.

PDC staff is reminding you about the importance of the requirements under RCW 42.17A.345 and WAC 390-18-050. Staff expects that you will implement and maintain the process you described to identify political advertising and retain required records.

Based on this information, the PDC has dismissed this matter in accordance with <u>RCW</u> 42.17A.755(1).

If you have questions, you may contact Kim Bradford at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc.wa.gov.

Sincerely,

Electronically signed by Kim Bradford
Kim Bradford
Deputy Director

cc: Conner Edwards