

October 23, 2018

VIA U.S. MAIL AND E-MAIL

Kurt Young
Washington Public Disclosure Commission
Evergreen Plaza
711 Capitol Way S #206
Olympia, WA 98504

Re: Complaint by Conner Edwards against
Pierce County Library System

Dear Mr. Young:

This law firm represents the Pierce County Library System. Thank you for taking the time to discuss the recent complaint by Conner Edwards against our client. I write to follow up on our recent phone call and submit a more formal response to the complaint.

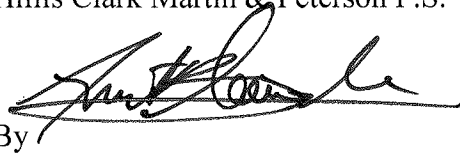
Mr. Edwards alleges that the Library System violated campaign laws by “sponsoring” a Facebook post linking a recent editorial from the Tacoma News Tribune supporting the upcoming library funding levy. As you know, the general statutory prohibition against using public resources in a campaign does not apply to an agency’s regular and normal activities. As I mentioned over the phone, the Library System regularly sponsors Facebook posts to reach more of its followers. I have enclosed a copy of Facebook’s advertising report for the Library System. This report goes back to August of 2016, and it demonstrates that sponsoring posts is part of the agency’s normal and regular conduct.

Kurt Young
October 23, 2018
Page 2 of 2

We hope this information will resolve the matter given the clear statutory exemption for this kind of activity. If you need additional information, however, please do not hesitate to call or e-mail me.

Very truly yours,

Hillis Clark Martin & Peterson P.S.

A handwritten signature in black ink, appearing to read "Amit D. Ranade", written over a horizontal line.

By

Amit D. Ranade

Enclosure

cc: Client



Report Period: Aug 16, 2016 - Oct 15, 2018

Ad Name	Ad Set Name	Reach	Impressions	Results	Cost per Result	Amount Spent (USD)	Ends	Starts
Event: Graphic Novel Workshop with The CLAW	All	7812	17520	106.00	0.94	100.00		
	Event: Graphic Novel Worksl	7812	17520	106.00	0.94	100.00	2018-04-28	2018-04-19
Post: "Story time is available for all ages at your..."	All	8364	10187	83.00	1.20	100.00		
	Post: "Story time is available	8364	10187	83.00	1.20	100.00	2017-11-10	2017-11-09
Event: Selma Free Screening	All	7294	17023	93.00	1.08	100.00		
	Event: Selma Free Screening	7294	17023	93.00	1.08	100.00	2018-04-06	2018-03-29
Event: Coffee with your Librarian	All	2751	4117	16.00	6.25	100.00		
	Event: Coffee with your Libr	2751	4117	16.00	6.25	100.00	2018-09-24	2018-09-18
Post: "Get the training, skills and information you need..."	All	8883	10265	103.00	0.97	100.00		
	Post: "Get the training, skills	8883	10265	103.00	0.97	100.00	2017-10-24	2017-10-23
Event: Coffee with your Librarian	All	4021	7170	15.00	6.67	100.00		
	Event: Coffee with your Libr	4021	7170	15.00	6.67	100.00	2018-10-02	2018-09-26
Post: "Thank you to TNT's editorial board for endorsing..."	All	21412	31710	423.00	0.59	250.00		
	Post: "Thank you to TNT's ec	21412	31710	423.00	0.59	250.00	2018-09-22	2018-09-17
Event: Pierce County Reads Kickoff Event	All	9266	18799	187.00	0.53	100.00		
	Event: Pierce County Reads I	9266	18799	187.00	0.53	100.00	2018-03-15	2018-03-09
Event: Coffee with your Librarian	All	2705	4604	15.00	6.67	100.00		
	Event: Coffee with your Libr	2705	4604	15.00	6.67	100.00	2018-10-08	2018-10-04
Event: Coffee with your Librarian	All	3253	4456	30.00	3.33	100.00		
	Event: Coffee with your Libr	3253	4456	30.00	3.33	100.00	2018-09-18	2018-09-13
Event: Student Loans and Debt: Managing Debt Accumulation	All	5202	7055	31.00	3.23	100.00		
	Event: Student Loans and De	5202	7055	31.00	3.23	100.00	2018-02-09	2018-02-07
Event: Pierce County Conversations: Peace Meals	All	2978	4816	35.00	1.43	50.00		
	Event: Pierce County Conver	2978	4816	35.00	1.43	50.00	2018-05-07	2018-05-04
Post: "Build like mad at a Building Madness Class at..."	All	6428	8296	4312.00	0.02	100.00		
	Post: "Build like mad at a Bui	6428	8296	4312.00	0.02	100.00	2017-11-28	2017-11-27
Event: Graphic Novel Workshop with Della Gable	All	4212	6445	38.00	1.32	50.00		
	Event: Graphic Novel Worksl	4212	6445	38.00	1.32	50.00	2018-04-18	2018-04-16
Event: Coffee with your Librarian	All	4255	5925	31.00	3.23	100.00		
	Event: Coffee with your Libr	4255	5925	31.00	3.23	100.00	2018-09-17	2018-09-13
Event: Coffee with your Librarian	All	2783	4973	22.00	4.55	100.00		
	Event: Coffee with your Libr	2783	4973	22.00	4.55	100.00	2018-10-02	2018-09-25
Event: Coffee with your Librarian	All	3137	5815	19.00	5.26	100.00		
	Event: Coffee with your Libr	3137	5815	19.00	5.26	100.00	2018-10-02	2018-09-26
Event: Peace Meals	All	2128	2570	8.00	5.03	49.26		
	Event: Peace Meals	2128	2570	8.00	5.03	49.26	2018-05-17	2018-05-17
Post: "There is so much to learn at your library! Check..."	All	8307	10157	108.00	0.93	100.00		
	Post: "There is so much to le	8307	10157	108.00	0.93	100.00	2017-10-27	2017-10-26
Event: Unified and Never Alone: Celebrating Youth with Disabil	All	4184	6973	35.00	2.14	75.00		
	Event: Unified and Never Alc	4184	6973	35.00	2.14	75.00	2018-08-04	2018-07-31
Post: "Thinking about going into business for yourself?..."	All	5651	6756	45.00	2.22	100.00		
	Post: "Thinking about going i	5651	6756	45.00	2.22	100.00	2017-11-21	2017-11-20
Post: "Get Smart and expand your knowledge with classes..."	All	9189	10856	113.00	0.88	100.00		
	Post: "Get Smart and expans	9189	10856	113.00	0.88	100.00	2017-11-07	2017-11-06
Post: "How to meet the needs of your growing community?..."	All	8121	16615	444.00	0.23	100.00		
	Post: "How to meet the nees	8121	16615	444.00	0.23	100.00	2018-02-01	2018-01-25
Event: Coffee with your Librarian	All	3096	4427	24.00	4.17	100.00		
	Event: Coffee with your Libr	3096	4427	24.00	4.17	100.00	2018-09-24	2018-09-18
Event: Graphic Novel Workshop with Nicole J. Georges	All	3622	6484	35.00	1.43	50.00		
	Event: Graphic Novel Worksl	3622	6484	35.00	1.43	50.00	2018-04-25	2018-04-19
Post: "What do you imagine creating: A castle, a slide..."	All	6197	7974	4155.00	0.02	100.00		
	Post: "What do you imagine	6197	7974	4155.00	0.02	100.00	2017-11-17	2017-11-16
Post: "Sign up to get your card today at..."	All	11652	16499	2127.00	0.05	100.00		
	Post: "Sign up to get your ca	11652	16499	2127.00	0.05	100.00	2018-09-09	2018-09-06
Post: "E-reader + ebooks = endless summer bliss! Not..."	All	4129	6328	538.00	0.07	39.14		
	Post: "E-reader + ebooks = e	4129	6328	538.00	0.07	39.14	2018-08-24	2018-08-17
Event: Racial Equity and Education: An Introduction	All	5618	13597	73.00	1.37	100.00		
	Event: Racial Equity and Edu	5618	13597	73.00	1.37	100.00	2018-02-21	2018-02-14
Event: Coffee with your Librarian	All	2535	3721	14.00	7.14	100.00		
	Event: Coffee with your Libr	2535	3721	14.00	7.14	100.00	2018-09-24	2018-09-18
Event: The Healing Tale: How Stories Can Move Us Beyond Shan	All	2283	2891	36.00	1.39	50.00		
	Event: The Healing Tale: How	2283	2891	36.00	1.39	50.00	2018-10-05	2018-10-04
Event: Coffee with your Librarian	All	3813	5920	30.00	3.33	99.83		
	Event: Coffee with your Libr	3813	5920	30.00	3.33	99.83	2018-09-16	2018-09-11
Event: Student Loans and Debt: Managing Debt After College	All	5420	8263	36.00	2.78	100.00		
	Event: Student Loans and De	5420	8263	36.00	2.78	100.00	2018-02-07	2018-02-05
Post: "Pierce County Library System's MakerFest is..."	All	17175	21127	195.00	0.77	150.00		
	Post: "Pierce County Library	17175	21127	195.00	0.77	150.00	2017-10-31	2017-10-30
Event: Living History: A Special After-Hours Event	All	7884	15398	182.00	0.44	80.00		
	Event: Living History: A Spec	7884	15398	182.00	0.44	80.00	2018-04-13	2018-04-04
Event: Coffee with your Librarian	All	3798	5752	32.00	3.13	100.00		
	Event: Coffee with your Libr	3798	5752	32.00	3.13	100.00	2018-09-18	2018-09-13
Event: Self-Care Mondays: Stretch and Sketch for Teens	All	5038	6616	50.00	2.00	100.00		
	Event: Self-Care Mondays: S	5038	6616	50.00	2.00	100.00	2018-09-16	2018-09-13
Event: Student Loans and Debt: Managing Debt Accumulation	All	4526	7103	31.00	3.23	100.00		
	Event: Student Loans and De	4526	7103	31.00	3.23	100.00	2018-03-02	2018-02-23
Event: Pierce County READS Author Event	All	6882	17742	98.00	1.02	100.00		
	Event: Pierce County READS	6882	17742	98.00	1.02	100.00	2018-05-11	2018-05-02
Event: Graphic Novel Workshop with Colleen Frakes	All	6464	12207	58.00	1.72	100.00		
	Event: Graphic Novel Worksl	6464	12207	58.00	1.72	100.00	2018-04-17	2018-04-13
Post: "Build, create, craft, code and more at Pierce..."	All	13951	20753	416.00	0.32	134.51		
	Post: "Build, create, craft, co	13951	20753	416.00	0.32	134.51	2017-10-26	2017-10-19
Post: "How to meet the needs of your growing community?..."	All	6674	11105	71.00	1.41	100.00		
	Post: "How to meet the nees	6674	11105	71.00	1.41	100.00	2018-02-11	2018-02-07
Post: "What is Fake News? Don't let yourself be..."	All	5630	6846	258.00	0.39	100.00		
	Post: "What is Fake News? D	5630	6846	258.00	0.39	100.00	2017-11-04	2017-11-03
Event: Coffee with your Librarian	All	2852	4262	16.00	6.25	100.00		
	Event: Coffee with your Libr	2852	4262	16.00	6.25	100.00	2018-09-24	2018-09-18
Event: Pierce County Conversations: McCleary and School Fundin	All	6126	12800	69.00	1.45	100.00		
	Event: Pierce County Conver	6126	12800	69.00	1.45	100.00	2018-01-28	2018-01-22
Event: The Hunting Ground: Film and Discussion	All	5752	11554	41.00	2.44	100.00		
	Event: The Hunting Ground:	5752	11554	41.00	2.44	100.00	2018-02-27	2018-02-21
Event: Coffee with your Librarian	All	2924	4818	17.00	5.88	100.00		
	Event: Coffee with your Libr	2924	4818	17.00	5.88	100.00	2018-09-25	2018-09-20
Post: "Come play with the big blue blocks! KaBOOM!..."	All	8378	11365	6462.00	0.03	200.00		
	Post: "Come play with the bi	8378	11365	6462.00	0.03	200.00	2017-12-23	2017-12-22
Post: "What do you want from your library? Share your..."	All	1813	2010	67.00	0.47	31.78		
	Post: "What do you want fro	1813	2010	67.00	0.47	31.78	2018-02-13	2018-02-12
Event: Student Loans and Debt: Managing Debt After College	All	5442	8505	35.00	2.86	100.00		
	Event: Student Loans and De	5442	8505	35.00	2.86	100.00	2018-02-13	2018-02-08
Event: Coffee with your Librarian	All	1835	2819	12.00	4.17	50.00		
	Event: Coffee with your Libr	1835	2819	12.00	4.17	50.00	2018-09-18	2018-09-13
Post: "What are you doing today? How about stopping by..."	All	8674	16718	1389.00	0.07	100.00		
	Post: "What are you doing to	8674	16718	1389.00	0.07	100.00	2018-08-27	2018-08-20
Post: "Did you know... the Pierce County Library System..."	All	6706	9296	588.00	0.17	100.00		
	Post: "Did you know... the P	6706	9296	588.00	0.17	100.00	2018-10-08	2018-10-05
Post: "Baby Books to Go is a new program from your..."	All	7953	13693	6798.00	0.02	150.00		
	Post: "Baby Books to Go is a	7953	13693	6798.00	0.02	150.00	2017-12-18	2017-12-15
Event: Coffee with your Librarian	All	2851	4934	16.00	6.25	100.00		
	Event: Coffee with your Libr	2851	4934	16.00	6.25	100.00	2018-10-10	2018-10-04
Post: "Did you get a new device for the holiday? Need..."	All	9020	14159	8284.00	0.02	200.00		
	Post: "Did you get a new dev	9020	14159	8284.00	0.02	200.00	2017-12-31	2017-12-29
Event: The Unspoken Truths: American History Traveling Museu	All	12831	22612	375.00	0.27	100.00		
	Event: The Unspoken Truths	12831	22612	375.00	0.27	100.00	2018-03-23	2018-03-15
Post: "Have you been assigned your first paper? Are you..."	All	7201	8219	39.00	2.56	100.00		
	Post: "Have you been assign	7201	8219	39.00	2.56	100.00	2017-10-17	2017-10-16