

Complaint Description

File a Formal Complaint - Susan Peters

[Smp](#) reported (Wed, 31 Oct at 4:55 PM) via Portal [Meta](#)

This election year, specifically in the month of October 2018, the WA State REALTOR'S PAC paid for and distributed multiple 'hit piece' mailers attacking State Senator and candidate Maralyn Chase. (See attached images.)

Stand for Children Washington PAC is the top contributor to the WA Realtor's PAC, as evidenced here:

https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=CANDP%20%20507&election_year=2018

WA REALTORS PAC, 2018

[Overview](#)

[Contributions](#)

[Expenditures](#)

[Loans](#)

[Pledges](#)

[Debt](#)

[Reports](#)

Cash contributions: 1,096,130.38

In-kind contributions: 90,878.50

Top 45 contributors to this campaign

Amounts shown are aggregate totals of cash and in-kind contributions.

Name	City	State	Cash/In-kind	Amount
STAND FOR CHILDREN WASHINGTON PAC	SEATTLE	WA	In kind	32,250.00
ASSOCIATION OF WASHINGTON REALTORS	OLYMPIA	WA	In kind	28,080.00
MISCELLANEOUS RECEIPTS			Cash	10,521.37
WASHINGTON REALTORS	OLYMPIA	WA	Cash	10,000.00

SEATTLE-KING COUNTY ASSOCIATION OF REALTORS	BELLE VUE	W A	Cash	10,000.00
MARTIN JERRY	STANWOOD	W A	Cash	5,035.00
SCOTT J. LENNOX	MEDINA	W A	Cash	5,035.00

Yet the mailers only list the following funders: WA REALTORS, Seattle King County Assoc of Realtors, J. Lennox Scott, Jerry Martin, and the Spokane Association of Realtors.

The mailers have omitted the top contributor to the WA REALTORS PAC, the Stand for Children PAC.

This is a violation of RCW 42.17A.320 which states (bold emphasis mine):

Identification of sponsor—Exemptions.

(1) All written political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name and address. All radio and television political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name. The use of an assumed name for the sponsor of electioneering communications, independent expenditures, or political advertising shall be unlawful. For partisan office, if a candidate has expressed a party or independent preference on the declaration of candidacy, that party or independent designation shall be clearly identified in electioneering communications, independent expenditures, or political advertising.

*(2) In addition to the information required by subsection (1) of this section, except as specifically addressed in subsections (4) and (5) of this section, **all political advertising undertaken as an independent expenditure or an electioneering communication by a person or entity other than a bona fide political party must include as part of the communication:***

(a) The statement: "No candidate authorized this ad. It is paid for by (name, address, city, state)";

(b) If the sponsor is a political committee, the statement: "Top Five Contributors," followed by a listing of the names of the five persons or entities making the largest contributions in excess of seven hundred dollars reportable

under this chapter during the twelve-month period before the date of the advertisement or communication; and

(c) If the sponsor is a political committee established, maintained, or controlled directly, or indirectly through the formation of one or more political committees, by an individual, corporation, union, association, or other entity, the full name of that individual or entity.

Source: <http://app.leg.wa.gov/RCW/default.aspx?cite=42.17A.320>

This omission is also a potential violation of RCW [42.17A.435](#):

Identification of contributions and communications.

No contribution shall be made and no expenditure shall be incurred, directly or indirectly, in a fictitious name, anonymously, or by one person through an agent, relative, or other person in such a manner as to conceal the identity of the source of the contribution or in any other manner so as to effect concealment.

[[1975 1st ex.s. c 294 § 8](#); 1973 c 1 § 12 (Initiative Measure No. 276, approved November 7, 1972). Formerly RCW [42.17.120](#).]

This is not a one-time oversight, but has occurred multiple times, on at least two political mailers opposing Senator Maralyn Chase. (See attached images #1 & #2.)

SECOND VIOLATION - digital ads supporting Jesse Salomon listing nonexistent PAC as sponsor

Also, digital advertisements are being purchased and distributed online supporting State Senate candidate Jesse Salomon (see attached image #3). The listed sponsor is a political action committee that does not exist.

This is a flagrant violation of RCW [42.17A.435](#): and RCW [42.17A.715](#):

Identification of contributions and communications.

No contribution shall be made and no expenditure shall be incurred, directly or indirectly, in a fictitious name, anonymously, or by one person through an agent, relative, or other person in such a manner as to conceal the identity of the source of the contribution or in any other manner so as to effect concealment.

[[1975 1st ex.s. c 294 § 8](#); 1973 c 1 § 12 (Initiative Measure No. 276, approved November 7, 1972). Formerly RCW [42.17.120](#).]

RCW [42.17A.715](#):

Concealing identity of source of payment prohibited—Exception.

No payment shall be made to any person required to report under RCW [42.17A.700](#) and no payment shall be accepted by any such person, directly or indirectly, in a fictitious name, anonymously, or by one person through an agent, relative, or other person in such a manner as to conceal the identity of the source of the payment or in any other manner so as to effect concealment. The commission may issue categorical and specific exemptions to the reporting of the actual source when there is an undisclosed principal for recognized legitimate business purposes.

Therefore I request that the PDC immediately investigate these multiple violations as prescribed by RCW [42.17A.755](#) (Violations—Determination by commission—Penalties—Procedure) and any other relevant laws, and impose any due penalties to the full extent of the law.

And I also demand that the WA REALTORS PAC disclose Stand for Children PAC on all and any further ads, and that any ads falsely claiming to be sponsored (funded) by the false PAC “Stand for Washington Students PAC” cease and desist immediately (this is immediately possible with digital ads).

Thank you.
Susan Peters
Seattle, WA

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

Important, legally required, campaign finance information that may impact voters' understanding of the veracity, motivations and agenda behind political mailers and digital political advertisements have been repeatedly withheld from the public.

It is not possible for the voting public to make fully informed decisions about candidates and issues if they are left in the dark about the the true identity of the sponsors of political messages.

This failure of public disclosure is a violation of WA State Public Disclosure law (specifically RCW 42.17A.320, RCW 42.17A.435; RCW 42.17A.715) which require that the top 5 contributors to a political advertisement be identified on advertisements, and prohibit the concealment of the identity of a source of payment for a political ad or the use of false identities.

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

1. Mailer attacking State Senator and candidate Maralyn Chase, funded by the WA REALTORS PAC, which fails to identify and list the top contributor to the PAC, Stand for Children WA PAC.
2. Another mailer attacking State Senator and candidate Maralyn Chase, funded by the WA REALTORS PAC, which fails to identify and list the top contributor to the PAC, Stand for Children WA PAC.
2. Digital advertisement supporting state senate candidate Jesse Salomon, sponsored by a nonexistent, nonregistered PAC going by the name of "Stand for Washington Students PAC."

List of potential witnesses with contact information to reach them.

Sally Soriano, 206-261-4664

Complaint Certification:

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.



We Support Jesse Salomon for State Senate: Effective, Proven Leadership

...

Sponsored • Paid for by Stand for Washington Students PAC •

Jesse Salomon is an effective local leader who will bring a fresh perspective to the Washington State Senate. Jesse has already accomplished so much for our community on affordable housing, transportation, and the environment. Join us in voting **#JesseForSenate** today!

Paid for by Stand for Was...

By Mail or on November 6,
VOTE DEMOCRAT

Jesse



7

504 14th Ave. SE
Olympia, WA 98501

PSRT STD
US POSTAGE PAID
SEATTLE WA
PERMIT 315

No candidate authorized this ad. It is paid for by Washington REALTORS PAC, 504 14th Ave. SE, Olympia, WA 98501.
Top Five Contributors: Washington REALTORS®, Seattle King County Association of REALTORS®, J. Lennox Scott, Jerry Martin, Spokane Association of REALTORS®

6346-25 0-1

SENATOR MARALYN CHASE (D) Wrote a Bill to
Encourage Couples to Only Have 2 Children

**Wait,
WHAT?!**

