



**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: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

June 14, 2022

Delivered electronically to Sophia Blamey at “sbblamey@gmail.com”

Subject: Complaint regarding Shane Seaman, PDC Case 109143

Dear Sophia Blamey:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on May 31, 2022. The complaint alleged that Shane Seaman, a 2022 candidate for Kitsap County District Court Judge, Position 3, may have violated RCW 42.17A.320 for failure to include complete sponsor ID on written political advertisement.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by the Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- On April 11, 2022, Shane Seaman submitted a Candidate Registration (C-1 report) declaring his candidacy for Kitsap County District Court Judge in the 2022 election, listing himself as Treasurer and choosing the “Full Reporting” option.
- The definition of “political advertising” found in RCW 42.17A.005(40) includes any advertising displays, newspaper ads, billboards, signs, brochures, articles, tabloids, flyers, letters, radio or television presentations, digital communication, or other means of mass communication, used for the purpose of appealing, directly or indirectly, for votes or for financial or other support or opposition in any election campaign.
- RCW 42.17A.320 requires that all written political advertising relating to candidates include the sponsor's name and address.
- The complaint alleged that the 2022 Shane Seaman Campaign created a website for the campaign and failed to include proper sponsor identification making it difficult or impossible for voters to ascertain who was paying for the advertising.
- Staff’s initial review of the website revealed that the sponsor ID included the name of the candidate followed by the office he was seeking, but failed to include the address of the sponsor.
- On June 8, 2022, staff sent notice to the Respondent regarding the complaint, requested a written response to the allegation no later than June 22, 2022 and requested the campaign to correct the sponsor ID on the 2022 campaign website.
- Later the same day, the Respondent submitted a written response and confirmed that the sponsor’s address had been added to the website in question.
- Staff reviewed the website to ensure the sponsor ID was in compliance with the requirements of RCW 42.17A.320(1) and were satisfied with the correction which now

says, “PAID FOR BY THE CAMPAIGN FOR SHANE SEAMAN FOR DISTRICT COURT JUDGE POSITION 3 (NON-PARTISAN) PO BOX 2261, POULSBO WA”.

- In his response, Mr. Seaman stated that the full sponsor ID including the address was inadvertently dropped from the final version of the website and that upon notice of the error, the campaign took immediate corrective action.
- The complaint included an additional alleged violation of RCW 42.17A.320 for failing to identify that the Respondent was seeking a non-partisan office.
- Although the campaign website now includes a non-partisan designation in the sponsor ID, RCW 42.17A.320(1) requires that 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 political advertising. Therefore, as the Respondent is not running for a partisan office, the non-partisan designation is not required in this instance.

It appears that the incomplete sponsor identification originally included on the 2022 Shane Seaman Campaign website was due to an oversight and not purposely omitted to conceal the identity of the sponsor of the ad.

Based on our findings staff has determined that, in this instance, failure to include a complete sponsor identification on written political advertisement does not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, Shane Seaman will receive a formal written warning concerning failure to include a complete sponsor identification on written political advertisement. The formal written warning will include staff’s expectation that Mr. Seaman will review all future written political advertisement to ensure that it includes the required sponsor identification prior to being made available to the general public. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Peter Frey Lavalley
Executive Director

cc: Shane Seaman