Respondent Names

Hilary Franz

Complainant Name

Samuel Daheim

Complaint Description

Samdaheim

Fri, 23 Jun 2023 at 9:37 AM

Dear PDC Staff: Hilary Franz violated the Campaign Fair Practices Act by paying multiple consultants working on her gubernatorial campaign with funds raised for her re-election for Lands Commissioner. Paying gubernatorial consultants from her Lands Commissioner Account Hilary Franz sent numerous campaign emails on behalf of her campaign for Governor in May 2023. You will see that the disclosure on the bottom of those emails falsely states they were paid for by her gubernatorial campaign. In fact, Franz's gubernatorial campaign did not pay a digital fundraising consultant in May. However, her 2024 Lands Commissioner re-election campaign paid Run the World Digital a total of \$18,000 for "digital consulting" and "email services" in May. In other words, she improperly used her 2024 Lands Commissioner account to pay for services used for her gubernatorial campaign. Franz also paid "North Star Strategies LLC" \$12,534 for "Management and consulting services" from her 2024 Lands Commissioner account in May. North Star Strategies LLC includes Stephanie Ervin and Jack Sorensen. Both individuals represented themselves as agents of Franz's gubernatorial campaign throughout the month of May. Sorensen is identified as a "campaign spokesperson" for Franz's gubernatorial campaign by the Seattle Times as early as April 28. Despite clearly working for her gubernatorial campaign as early as April, North Star Strategies LLC was paid \$11,739.83 from Franz's 2024 Lands Commissioner campaign during the month of April. North Star received no compensation from Franz's gubernatorial account for either April or May. These are material violations that cheat the law, the public, and Franz's donors. This violation illegally allows Franz to display a falsely high "cash on hand" number to the public and, ultimately, spend more than she is allowed on her gubernatorial campaign. These violations deny the public access to the identities of her campaign consultants and contravene the intent of the individuals who donated to her Lands Commissioner campaign. While I would like to believe these were good faith errors, there is evidence these violations are intentional. Franz's Treasurer prorated his fees for the month of May. Consequently, he was aware of the legal requirement to pay for the work done on behalf of the gubernatorial campaign from the gubernatorial committee. Nonetheless, he was apparently directed not to prorate for at least two of Franz's most expensive consultants. Additional disclosure violations: On May 10, Franz posted a 2 minute and 15 second video to social media with the text "I'm running for Governor of Washington state." Her campaign reported no costs, debts, or cost estimates associated with the production of this video, as required by law.

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

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

List of potential witnesses with contact information to reach them

Certification (Complainant)

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.