

Respondent Name
Snohomish Ebony PAC
Complainant Name
Michael Swanson
Complaint Description
<u>Michaelswanson</u> reported via the portal 12 hours ago (Tue, 24 Oct 2023 at 8:22 PM) Notice of PDC Violations by 2023 Everett City Council Candidate Demi Chatters Everett voters received a political mail piece on 10/23/2023 and 10/24/2023 (Exhibits 1 & 2) in support of Everett City Council candidate Demi Chatters. The mail piece was “Sponsored by The Snohomish Ebony PAC.” Setting aside the factual inaccuracies of this advertising, the mailing was produced in blatant violation of Washington State laws and Public Disclosure Commission requirements summarized by the following: 1. Coordination between Demi Chatters and the PAC. - First and foremost, the supported candidate, Demi Chatters, is listed on the PAC’s PDC registration (Exhibit 3) and most recent filings as its Treasurer (Exhibit 4). A Treasurer is responsible for reporting all contributions and expenditures (see RCW 42.17A.235). PAC’s may not coordinate political advertising with campaign committees. Serving as both Treasurer of the PAC - <u>and</u> the candidate that benefited from the PAC’s advertising - is clearly coordination. - The campaign mailer sent by the PAC is remarkably similar to two previous mailers sent by the candidate. Same image, same use of campaign logo, same color font, etc. Placed side-by-side, as in Exhibit 5, they appear indistinguishable. Exhibit 6 includes the reverse to see which mailer was from the candidate vs. the PAC. - Further evidence of coordination is that the image used does not exist in the public domain. While a similar version is available on the candidate’s website (Exhibit 7), this version contains text and a “donate today” button over it parts that are scenic in the mail piece, meaning the PAC and candidate would have had to facilitate the transfer of an original image file not available in the public domain. 2. Public Disclosure Reports not filed. - The PAC did not file PDC Form C6 for Independent Expenditure Ads (Exhibit 8) as required (Exhibit 9). - The PAC has not reported any of their income or expense activity for over 2 months. Last reports filed 8/6/23 (Exhibit 10). - Again, as Treasurer of the PAC, it is Demi Chatters’ responsibility to file all public disclosure reports on time. 3. Required information withheld from public. - The PAC did not list their top 5 contributors on the mail piece (Exhibit 2) as required (Exhibit 11).
What impact does the alleged violation(s) have on the public?
Disregarding campaign laws deprives the public of understanding who is funding candidates for elected office. Voters in Everett are not being deprived of complete information of who is funding campaign advertising from a PAC who's Treasurer is the candidate supported by the mailings.
List of attached evidence or contact information where evidence may be found
There are 11 exhibits included in the attached PDF.
List of potential witnesses with contact information to reach them
Michael Swanson, 425-293-2816, michaelswanson@comcast.net An unknown number of Everett resident who received the mailer in question.
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.

Notice of PDC Violations by 2023 Everett City Council Candidate Demi Chatters

Date: 10/24/2023
Prepared by: Michael Swanson
Respondent: Demetria A. "Demi" Chatters

Background: Everett voters received a political mail piece on 10/23/2023 and 10/24/2023 (Exhibits 1 & 2) in support of Everett City Council candidate Demi Chatters. The mail piece was "Sponsored by The Snohomish Ebony PAC." Setting aside the factual inaccuracies of this advertising, the mailing was produced in blatant violation of Washington State laws and Public Disclosure Commission requirements summarized by the following:

1. Coordination between Demi Chatters and the PAC.

- First and foremost, the supported candidate, Demi Chatters, is listed on the PAC's PDC registration (Exhibit 3) and most recent filings as its Treasurer (Exhibit 4). A Treasurer is responsible for reporting all contributions and expenditures (see RCW 42.17A.235). PAC's may not coordinate political advertising with campaign committees. Serving as both Treasurer of the PAC - and the candidate that benefited from the PAC's advertising - is clearly coordination.
- The campaign mailer sent by the PAC is remarkably similar to two previous mailers sent by the candidate. Same image, same use of campaign logo, same color font, etc. Placed side-by-side, as in Exhibit 5, they appear indistinguishable. Exhibit 6 includes the reverse to see which mailer was from the candidate vs. the PAC.
- Further evidence of coordination is that the image used does not exist in the public domain. While a similar version is available on the candidate's website (Exhibit 7), this version contains text and a "donate today" button over it parts that are scenic in the mail piece, meaning the PAC and candidate would have had to facilitate the transfer of an original image file not available in the public domain.

2. Public Disclosure Reports not filed.

- The PAC did not file PDC Form C6 for Independent Expenditure Ads (Exhibit 8) as required (Exhibit 9).
- The PAC has not reported any of their income or expense activity for over 2 months. Last reports filed 8/6/23 (Exhibit 10).
- Again, as Treasurer of the PAC, it is Demi Chatters' responsibility to file all public disclosure reports on time.

3. Required information withheld from public.

- The PAC did not list their top 5 contributors on the mail piece (Exhibit 2) as required (Exhibit 11).

Exhibit 1: 10/23/23 Mail Piece Obverse



Exhibit 2: 10/23/23 Mail Piece Reverse

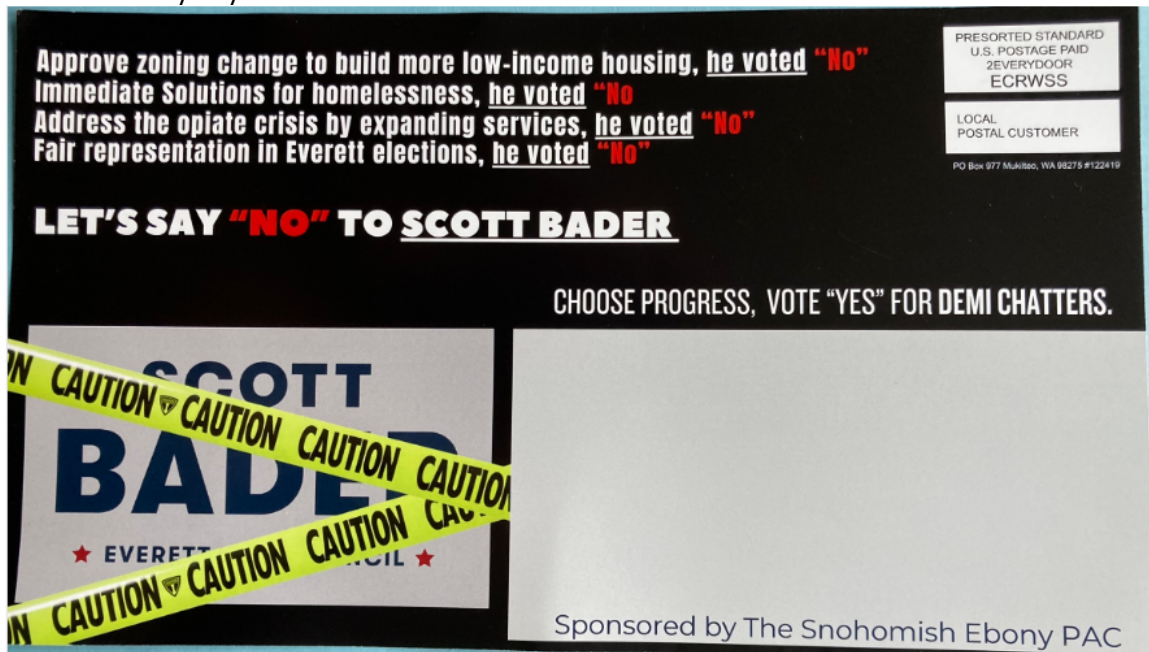


Exhibit 3: Demi Chatters listed as Treasurer of the PAC sponsoring the ad

Committees Washington State Snohomish Ebony PAC (SEPAC)	
pdcr.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2023-24888	
Snohomish Ebony PAC (SEPAC) - 2023	
Committee Information	Financial Information
Registration February 06, 2020	Campaign Starting Balance \$5,236.09
Treasurer Demetria Chatters P.O. Box 977 Mukilteo, WA, 98275 3234458244	Contributions Amount \$1,660.00
Political Committee Type Other	Loans Amount \$0.00
Jurisdiction None reported.	Total Receipts \$6,896.09
Committee Address P.O. Box 977 Mukilteo, WA 98275	Expenditures \$1,744.69
Phone 3234458244	Pledges \$0.00
Email info@snoebonypac.com	Debts \$0.00

Exhibit 4: Demi Chatters listed as Treasurer of the PAC on most recent reports

Mon Oct 23 4:49 PM

Committees | Washington

Snohomish Ebony PAC (S)

public

apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110164274

M



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4

Snohomish Ebony PAC (SEPAC)
Snohomish Ebony PAC - ([Registration](#))
P.O. Box 977
Mukilteo, WA 98275

Coverage: 07/01/2023 to 07/31/2023
Final report: No
Report number: 110164274
Reporting year: 2023
Date submitted: 08/06/2023

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$6,316.09
2. Cash received (Schedule A line 1).	\$430.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$430.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$6,746.09
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$1,557.72
11. Cash expenditures (Line 3 schedule A).	\$186.97	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$186.97
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$1,744.69

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$5,001.40
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$5,001.40

I certify this report is true and complete to the best of my knowledge
Treasurer's name and date
Demetria Chatters - 08/06/2023

Exhibit 5: 3 very similar mail pieces, although 1 of the 3 came from a PAC.



Exhibit 6: Reverse of the 3 mail pieces

Approve zoning change to build more low-income housing, he voted "No"
Immediate Solutions for homelessness, he voted "No"
Address the opiate crisis by expanding services, he voted "No"
Fair representation in Everett elections, he voted "No"

LET'S SAY "NO" TO SCOTT BADER

CHOOSE PROGRESS, VOTE "YES" FOR DEMI CHATTERS.

SCOTT BADER
 ★ EVERETT CITY COUNCIL ★

CAUTION CAUTION CAUTION CAUTION

Sponsored by The Snohomish Ebony PAC

Accessible & Accountable Leadership for Everett

The wealthy and well-connected have enjoyed an outsized voice on the Everett City Council for far too long. As your next council member, I will bring representative voices to the table to tackle our most urgent issues.

- Housing Stability & Affordability**
Decades of City Council decisions have resulted in inadequate housing supply that cannot meet our current and future population needs. As the Chair of the Planning Commission, I understand the urgency of proactively revising our local land use and zoning codes to prioritize easing housing cost burdens on Everett residents.
- Ensuring ALL Residents Feel Safe**
Our Public Safety workers provide critical services to residents. I will support them by demanding that they have access to the right resources for the right responses. I will build partnerships and regional system capacity for service providers who help meet the challenges of the crisis unfolding on our streets while extending respect and dignity to vulnerable people.
- Workforce Training & Economic Opportunity**
A recent ordinance requiring the use of Project Labor Agreements failed to be enacted in our city. I will stand in partnership with ALL who champion working families to secure fair wage and working conditions, workforce training and apprenticeship opportunities, and career pathways for family wage jobs and economic success.
- Protecting & Expanding Access to Green Spaces**
I will actively work to restore our streams and waterways, preserve our urban tree canopy, and identify and mitigate climate impacts through the framework of Everett's Climate Action Plan. Access to Everett's green spaces should not be car dependent and we can utilize small parcels of city owned land to build accessible mini-parks for families to enjoy.

PRESORTED STANDARD
U.S. POSTAGE PAID
305740-0001
ECRWSS

LOCAL
POSTAL CUSTOMER

PO Box 877 Everett, WA 98201-0877

RETURN YOUR BALLOT BY AUG. 11

PRINTED BY
FRIENDS OF OUR CITIES
PO BOX 877
EVERETT, WA 98201

AUTO-MAIL 5-DIGIT 98201
Blagburn and Michael A Swanson
City Council Resident
823 Plaster Ave
Everett WA 98201-1311

RETURN YOUR BALLOT BY NOV. 7

PRINTED BY
FRIENDS OF OUR CITIES
PO BOX 877
EVERETT, WA 98201

AUTO-MAIL 5-DIGIT 98201
Blagburn and Michael A Swanson
City Council Resident
823 Plaster Ave
Everett WA 98201-1311

**Doing Nothing
is No Longer an Option**

I will move us forward by **PROTECTING** the Pillars of
Stability for Working Families

- Housing Access and Affordability for ALL**
Fix our land use and zoning codes to allow for **gentle density**. Ease cost burdens for tax payers. Engage our neighborhoods in **housing and homelessness discussions**.
- Health and Safety for ALL**
Provide **public safety workers access to the right resources** for the right responses. Support **neighborhood policing** and problem solving. Expand human service system capacity to **increase access to drug treatment and emergency/ supportive shelter**.
- Economic Opportunity for ALL**
Develop **workforce training and apprenticeship opportunities**. Support **local small business** and entrepreneurs. Require **fair wages and working conditions** on taxpayer funded projects.
- Access to Green Spaces for ALL**
Preserve our **waterways and urban tree canopy**. Incentivize **green building practices**. Increase **walkable green space access** with embedded neighborhood mini-parks. Require **climate impact analysis** on policy decisions.

Exhibit 7: Candidate website containing similar image used by PAC but containing text and a donate button that were not in the version used for the mail piece.

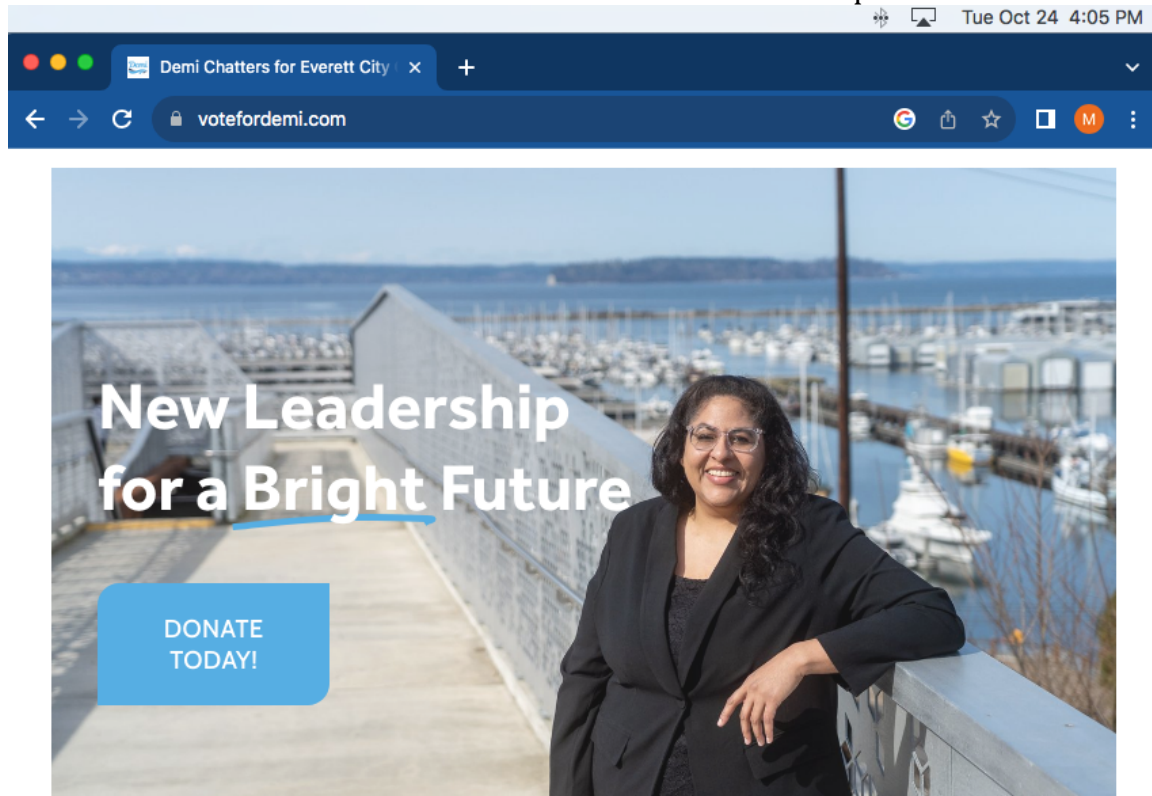


Exhibit 8: Independent Expenditures filed on behalf of Demi Chatters as of 10/23/23. Disclosure from Fuse Votes for assisting Demi Chatters with writing a Voters Guide Statement but nothing reported from The Snohomish Ebony PAC.

Mon Oct 23 4:53 PM

Candidates | Washington StateIndependent Expenditures | Wpublic

←→pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/689054/independent-expendituresPublic Disclosure Commission

[Home](#) > [Political Disclosure Data](#) > [Candidates](#) > [Demetria A. Chatters \(Demi Chatters\) - 2023](#) > Independent Expenditures

Demetria A. Chatters (Demi Chatters) 2023

Current independent expenditures for this campaign:

For: \$405.23

Against: \$0.00

Independent expenditures are made by third parties without the candidate's approval or collaboration.

Results for: **No selected filters.**

^ Hide FiltersSearch Tips

Sponsor Name

Amount

For/Against

Enter textX

FromToX

SelectX

Show50▼ entries

[Download 2 rows as CSV.](#)

Name	Amount	For/Against	Itemized Expenditures
FUSE VOTES	\$268.20	For	View Report
FUSE VOTES	\$137.03	For	View Report

Showing 1 to 2 of 2 entries

Previous1N

Exhibit 9: PDC requirements for C6 filing

Mon Oct 23 5:34 PM

How To Report | Washington x Independent Expenditures | V x default.aspx x public

← → ↻ pdc.wa.gov/registration-reporting/independent-expenditures/how-report

Candidates Committees Lobbyists Committees Public Officials



Registration & Reporting Political Disclosure Data Rules & Enforcement About

Home > Registration & Reporting > Independent Expenditures > How To Report

How To Report

Reporting Independent Expenditures

Any individual, business, union, organization or other person who makes independent expenditures totaling \$1,000 or more supporting or opposing a candidate or ballot measure must submit a [C-6](#) to the PDC within 5 days and then on this schedule:

- on the 10th of the month preceding the election*
- 21 days prior to the election*
- 7 days prior to the election*
- on the 10th of the month after the election*.

**Only file reports when expenditures have been made since the last report.*

The exception are political committees, which report IEs on their regular expenditure reports (C-4s) unless the independent expenditure requires expedited reporting because of its size and proximity to the election.

If an IE is advertising that meets both of the following conditions, the sponsor must report it on a C-6 within 24 hours of, or on the first working day after, the date the ad was published, mailed or made public:

- The ads are valued at \$2,000 or more, and
- are presented to the public within 21 days of an election.

Additional independent expenditure ads presented during this 21 days -- costing any amount -- must be reported on a C-6 within 24 hours of, or on the first working day after, the date the additional ad is first published, mailed or made public.

Inde Expe

What 1

How t

Log in

Exhibit 10: PAC Treasurer Demi Chatters has not filed any of the required reports since 8/6/2023

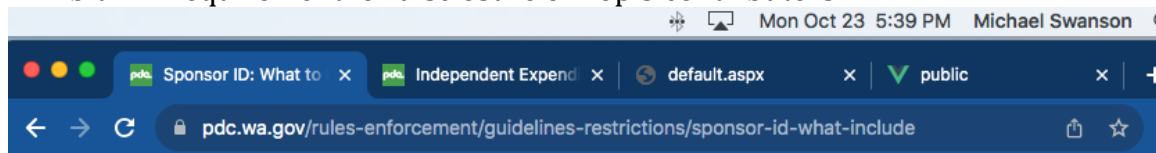
Mon Oct 23 4:48 PM

Committees | Washington State | Snohomish Ebony PAC (SEPAC)

pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2023-24888

Period	Report Number	Filed	Report	Form Type	Election Year
04/07/2023 - 04/07/2023	110164252	08/06/2023	View Report	C3	2023
04/05/2023 - 04/05/2023	110164251	08/06/2023	View Report	C3	2023
04/10/2023 - 04/10/2023	110164253	08/06/2023	View Report	C3	2023
04/19/2023 - 04/19/2023	110164255	08/06/2023	View Report	C3	2023
04/12/2023 - 04/12/2023	110164254	08/06/2023	View Report	C3	2023
05/05/2023 - 05/05/2023	110164256	08/06/2023	View Report	C3	2023
05/09/2023 - 05/09/2023	110164257	08/06/2023	View Report	C3	2023
05/10/2023 - 05/10/2023	110164258	08/06/2023	View Report	C3	2023
05/19/2023 - 05/19/2023	110164259	08/06/2023	View Report	C3	2023
05/30/2023 - 05/30/2023	110164260	08/06/2023	View Report	C3	2023
06/07/2023 - 06/07/2023	110164261	08/06/2023	View Report	C3	2023
06/08/2023 - 06/08/2023	110164262	08/06/2023	View Report	C3	2023
06/22/2023 - 06/22/2023	110164263	08/06/2023	View Report	C3	2023
06/28/2023 - 06/28/2023	110164264	08/06/2023	View Report	C3	2023
07/06/2023 - 07/06/2023	110164265	08/06/2023	View Report	C3	2023
07/07/2023 - 07/07/2023	110164266	08/06/2023	View Report	C3	2023
07/10/2023 - 07/10/2023	110164267	08/06/2023	View Report	C3	2023
07/19/2023 - 07/19/2023	110164268	08/06/2023	View Report	C3	2023
07/27/2023 - 07/27/2023	110164269	08/06/2023	View Report	C3	2023
08/07/2023 - 08/07/2023	110164270	08/06/2023	View Report	C3	2023
04/01/2023 - 04/30/2023	110164271	08/06/2023	View Report	C4	2023
05/01/2023 - 05/31/2023	110164272	08/06/2023	View Report	C4	2023

Exhibit 11: Requirement for disclosure of Top 5 contributors



Sponsor ID required information

A sponsor's address is required for print ads and websites. For other types of ads, see [Sponsor ID placement and size](#).

A **candidate or candidate committee** sponsoring an ad about the committee uses the words "paid for by" or "sponsored by" followed by the name of the candidate committee.

- *Recommended format: Sponsored by the Committee to Elect John Doe, 876 Main St., Olympia, WA*

An **individual, organization, business or political party committee** must include its name on the ad.

- *Recommended format: Paid for by the Committee for Good Government, 123 Market St., Olympia, WA*

A **political committee that is not a bona fide party** must include its Top 5 contributors' names if the ad qualifies as an independent expenditure, electioneering communication or supports or opposes a ballot measure – and the ad costs at least \$2,000.

- *Recommended format: Paid for by the Committee for Good Government, 123 Market St., Olympia, WA. Top 5 Contributors...*