



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

March 5, 2024

Delivered electronically to [benlund1957@gmail.com](mailto:benlund1957@gmail.com)

Subject: Complaint filed by Ryan Davey, PDC Case 146290

Dear Ben Lund:

Below is a copy of an electronic letter sent to Ryan Davey concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with requirements to include sponsor identification on political advertising. Staff expects you to include proper sponsor identification and, if the political advertising exceeds the amounts required to report, report the expenditures as required. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

/s

Alice Fiman  
Compliance Officer

Endorsed by,

/s

Peter Lavalley  
Executive Director



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March 5, 2024

Delivered electronically to rldavey3@gmail.com

Subject: Complaint regarding Ben Lund, PDC Case 146290

Dear Ryan Davey:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed December 6, 2023. The complaint alleged an advertisement in the Spokane Valley Current lacked proper sponsor identification, and the entity sponsoring the advertisement may need to register with the Public Disclosure Commission as a Political Action Committee (PAC).

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; and responses provided by the co-owner of the publication (Danica Wick) and the reported sponsor (Ben Lund) to determine if the activity supports a finding of one or more violations.

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

- The advertisement provided in the complaint was received Oct. 16, 2023, and ran in the Spokane Valley Current's November edition, which was published Oct. 27, 2023.
- The advertisement cost \$395 and was purchased by Ben Lund.
- RCW 42.17A.320 requires sponsor identification on political advertising.
- Ben Lund responded to the complaint and stated they were unaware of the PDC requirements to include sponsor identification.
- In response to the complaint, Ben Lund reported the advertisement was paid for with private funds and was the first and only political advertisement they have ever purchased.
- Because Ben Lund is an individual using their own funds, they are not required to register as a PAC.
- Ben Lund was not required to report the advertisement as an independent expenditure because the amount was less than \$1,000.
- Ben Lund also acknowledged they have reviewed PDC reporting requirements for both sponsor identification and independent expenditures.

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

Pursuant to WAC 390-37-060(1)(d), however, Ben Lund will receive a formal written warning concerning the failure to include sponsor identification on political advertising. The formal written warning will include staff's expectation Ben Lund, in the future, provide required sponsor identification on any political advertising. 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, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov)

Sincerely,

/s

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Alice Fiman  
Compliance Officer

Endorsed by,

/s

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Peter Lavalley  
Executive Director

cc: Ben Lund