

Respondent Name
Jamloop
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards reported via the portal (Fri, 8 Nov 2024 at 7:10 PM)</p> <p>Description of Complaint</p> <p>See attached complaint.</p> <p>Notice to Respondent</p> <p>I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff with a so-called "warning letter".</p> <p>This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.</p> <p>What are these shortcomings?</p> <p>Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.</p> <p>I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.</p> <p>Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/</p> <p>If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.</p> <p>"The journey of a thousand miles begins with a single step." — Lao Tzu</p>
What impact does the alleged violation(s) have on the public?
See complaint. The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.
List of attached evidence or contact information where evidence may be found
See complaint and also PDC website.
List of potential witnesses with contact information to reach them
See complaint and also PDC website.
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.

Expenditures

Search expenditures by all candidates and political committees since 2007. Campaigns are required to itemize any expense of more than \$50. Donated goods and services (known as in-kind contributions) also appear as expenditures, with the contributor listed in the recipient column.

Results for:

Recipient Name: Jamloop ✕

Expenditure Date: 01/01/2019- ✕

^ Hide Filters  Search Tips

Candidate/Committee Name

X

Election Year

X

Campaign Type

X

Recipient Name

X

Expenditure Date

X

Amount

X

City

X

State

X

Description

X

Show entries

[Download 34 rows as CSV.](#)

Candidate/Committee Name ▲	Election year ▼	Campaign Type ◆	Recipient Name ◆	Expenditure Date ◆	Amount ▼	Description ◆	City ◆	State ◆
CITIZENS FOR LIBERTY AND LABOR	2024	Political Committee	JamLoop	10/09/2024	\$21,675.00	677,291 FEP-OTT Digital Impressions 10/10 - 11/5	Walnut Creek	CA
CITIZENS FOR LIBERTY AND LABOR	2024	Political Committee	JamLoop	10/09/2024	\$3,825.00	212,465 TV PLUS Digital Impressions 10/10 - 11/5	Walnut Creek	CA
CITIZENS FOR LIBERTY AND LABOR	2023	Political Committee	JamLoop	10/17/2023	\$53,125.00	Digital Advertising - 1,570,657 Impressions running 10/17 - 11/7	Walnut Creek	CA
Jackson Legacy Fund (JLF)	2024	Political Committee	JamLoop LLC	07/27/2024	\$3,375.00	Digital Video Ads 7/27-8/6 111,742 imp supporting Bernbaum	Walnut Creek	CA
Jackson Legacy Fund (JLF)	2024	Political Committee	JamLoop LLC	07/27/2024	\$937.50	Digital Ads (pre-roll) 7/27-8/6 61,553 imp supporting Ritchie	Walnut Creek	CA
Jackson Legacy Fund (JLF)	2024	Political Committee	JamLoop LLC	07/27/2024	\$375.00	Digital Ads (Banner) 7/27-8/6 55,180 imp supporting Bernbaum	Walnut Creek	CA
Jim Henderson	2024	Candidate	Jamloop	07/01/2024	\$4,687.50	Digital Video FEP-OTT 07/03-07/20 1/2 Cost Shared with Michelle Downey Cailder for state Representative	Walnut Creek	CA

Candidate/Committee Name ▲	Election year ▼	Campaign Type ◆	Recipient Name ◆	Expenditure Date ◆	Amount ▼	Description ◆	City ◆	State ◆
Jim Henderson	2024	Candidate	Jamloop	07/01/2024	\$1,562.50	Digital Video TVPLUS 7/03- 7/20 1/2 Cost Shared with Michelle Downey Cailder for state Representative	Walnut Creek	CA
Justice Not Jails	2023	Political Committee	JamLoop	10/26/2023	\$35,700.00	1,397,533 digital impressions 10/24 - 11/07	Walnut Creek	CA
Keith L. Wagoner	2022	Candidate	JAMLOOP.COM	07/19/2022	\$10,000.00	Production of digital ad	Walnut Creek	CA
Lindsey Marie Shaw (Lindsey Shaw)	2023	Candidate	JamLoop LLC	10/31/2023	\$2,000.00	60606 Digital Impressions 10/31-11/6	Walnut Creek	CA
Loren D. Culp (Loren Culp)	2020	Candidate	JAMLOOP	07/21/2020	\$49,500.00	TV AD BUY: 7/17-8/4	WALNUT CREEK	WA
Loren D. Culp (Loren Culp)	2020	Candidate	JAMLOOP	05/07/2020	\$15,000.00	TV ADS FROM 5/11-5/31	WALNUT CREEK	WA
Marcus M. Riccelli (Marcus Riccelli)	2024	Candidate	JamLoop	10/14/2024	\$5,000.00	start 10/16 thru 11/5, 666,000 impressions 3rd LD target 18+	Walnut Creek	CA
Marcus M. Riccelli (Marcus Riccelli)	2024	Candidate	JamLoop	10/18/2024	\$4,250.00	10/16-11/5 run dates for 666,667 impressions	Walnut Creek	CA
Michelle L. D. Caldier (Michelle Caldier)	2024	Candidate	JamLoop LLC	07/02/2024	\$4,687.50	Shared digital ads: FEP-OTT 7/3 - 7/20	Walnut Creek	CA
Michelle L. D. Caldier (Michelle Caldier)	2024	Candidate	JamLoop LLC	07/02/2024	\$1,562.50	Shared digital ads: TVPLUS 7/3-7/20	Walnut Creek	CA

Candidate/Committee Name ▲	Election year ▼	Campaign Type ◆	Recipient Name ◆	Expenditure Date ◆	Amount ▼	Description ◆	City ◆	State ◆
Misipati Semi Bird (Semi Bird)	2024	Candidate	Jamloops	07/03/2024	\$15,000.00	Digital Video FEP-OTT 454K to 546K Impressions	Walnut Creek	CA
Misipati Semi Bird (Semi Bird)	2024	Candidate	Jamloops	06/05/2024	\$7,500.00	Digital Video FEP-OTT 227K to 273K Impressions	Walnut Creek	CA
Misipati Semi Bird (Semi Bird)	2024	Candidate	Jamloops	06/05/2024	\$7,500.00	Digital Video FEP-OTT 227K to 273K Impressions	Walnut Creek	CA
Misipati Semi Bird (Semi Bird)	2024	Candidate	Jamloops	08/03/2024	\$5,000.00	Digital Video FEP-OTT 151K to 182K Impressions	Walnut Creek	CA
Misipati Semi Bird (Semi Bird)	2024	Candidate	Jamloops	08/05/2024	\$5,000.00	Digital Video FEP-OTT 151K to 182K Impressions	Walnut Creek	CA
Misipati Semi Bird (Semi Bird)	2024	Candidate	Jamloops	03/22/2024	\$3,000.00	OTT/CTV Advertising Platform	Walnut Creek	CA
Misipati Semi Bird (Semi Bird)	2024	Candidate	Jamloops	11/24/2023	\$3,000.00	OTT/CTV Advertising Platform	Walnut Creek	CA
Misipati Semi Bird (Semi Bird)	2024	Candidate	Jamloops	08/01/2024	\$2,000.00	Digital Video FEP-OTT 63K to 76K Impressions	Walnut Creek	CA
Salvador A. Mungia (Sal Mungia)	2024	Candidate	JamLoop LLC	07/15/2024	\$17,000.00	Paid to NWP. Digital Video Ads 7/15-8/6 (45,333 impressions)	Walnut Creek	CA

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description	City	State
Salvador A. Mungia (Sal Mungia)	2024	Candidate	JamLoop LLC	10/25/2024	\$17,000.00	Paid to NWP. Digital Ads 10-25-11/5 531,208 impressions	Walnut Creek	CA
Salvador A. Mungia (Sal Mungia)	2024	Candidate	JamLoop LLC	07/15/2024	\$12,750.00	Paid to NWP. Digital Display Ads 7/15-8/6 (1275 impressions)	Walnut Creek	CA
Salvador A. Mungia (Sal Mungia)	2024	Candidate	JamLoop LLC	10/28/2024	\$8,500.00	Paid to NWP. Digital Ads 10/25-11/5 265,604 imp	Walnut Creek	CA
Steven L. Saunders (Steven L Saunders)	2022	Candidate	JAMLOOP LLC	08/29/2022	\$1,300.00	Online Streaming Advertisements	Walnut Creek	CA
Steven L. Saunders (Steven L Saunders)	2022	Candidate	JAMLOOP LLC	10/19/2022	\$750.00	Digital advertising	Walnut Creek	CA
WASHINGTON STATE DENTAL POLITICAL ACTION COMMITTEE	2024	Political Committee	Jamloop	08/01/2024	\$10,500.00	Digital ads 8/1-8/6 (Gibbons support).	Walnut Creek	CA
WASHINGTON STATE DENTAL POLITICAL ACTION COMMITTEE	2024	Political Committee	Jamloop	08/01/2024	\$6,000.00	Digital ads 8/1-8/6 (Felix oppose).	Walnut Creek	CA
WASHINGTON STATE DENTAL POLITICAL ACTION COMMITTEE	2024	Political Committee	Jamloop	08/01/2024	\$1,500.00	Digital ads 7/30 - 8/6 (Gibbons support).	Walnut Creek	CA

Showing 1 to 34 of 34 entries (filtered from 1,074,164 total entries)

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For Incidental Committees

For Lobbyists

For Elected Officials

For Voters & the Public

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Political Disclosure Reporting Data

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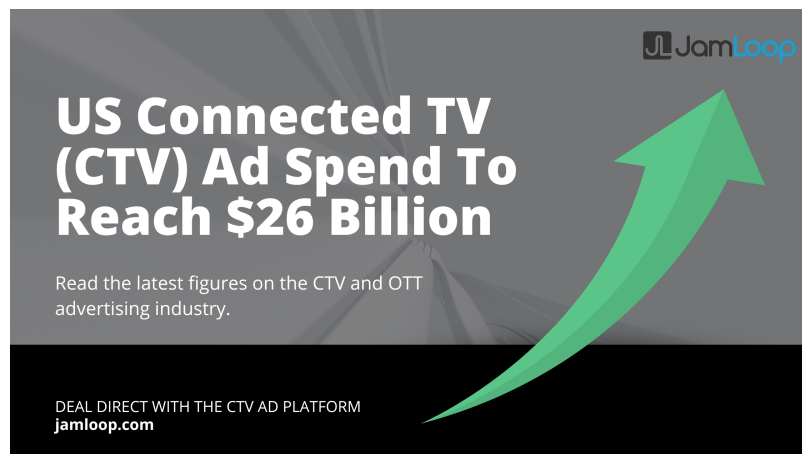
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FILE ONLINE

Resources: JamLoop



Reach Your Audience With OTT and CTV Advertising

Jan 24, 2023 2:26:10 PM / by Jake Sheets

0 Comments

Streaming media has disrupted the industry in recent years. With improved technology, consumers are cutting the cord and viewing more content on their phones, tablets, and smart TVs. As a result advertisers are beginning to spend more money on reaching these consumers on streaming platforms.

New figures that highlight the growth in OTT and CTV:

- CTV ad spend is expected to reach \$26 billion in 2023
- US Subscription OTT video ad spending will surpass \$10 billion this year and account for 10.2% of total video ad spending
- By the end of 2024, US CTV ad spending will be 50% the size of linear TV ad spending and reach \$31.77 billion in total spend

These numbers support the massive growth we've seen in recent years in the industry. Pre-pandemic, CTV accounted for less than 1/10th of combined TV and CTV ad spending. By 2024, CTV is expected to account for 1/3rd of total spending.

Driving the growth in OTT and CTV:

- 230 million people in the US will view content on CTV/OTT devices and by 2026, 70% of the population will use CTV/OTT (Source)

What digital advertising leaders are forecasting for 2023:

- 2023 total ad spend is projected to be up 5.9% YoY (Source)
- New customer acquisition is the top goal for 2023 advertising, followed by increasing brand awareness and media efficiency
- Programmatic digital display advertising will increase by 33% (Source)

Effectively Run Your OTT Campaigns

OTT data and insights

OTT advertising provides access to deep data about viewers, such as age, gender, location, and even viewing habits. This allows advertisers to tailor their messaging to reach their target audience more effectively.

[Read More →](#)



JamLoop

**PURPOSE-BUILT
OTT/CTV PLATFORM**

Deal direct with JamLoop's industry-leading DSP platform for OTT/CTV advertising.

REQUEST A DEMO!

The graphic features the JamLoop logo, a large blue speech bubble containing the text 'PURPOSE-BUILT OTT/CTV PLATFORM', and an illustration of a woman holding a megaphone next to a smartphone displaying a video player interface with social media-style engagement icons.

JamLoop Brings A Fast, Flexible, and Transparent OTT/CTV Experience

Jan 5, 2023 11:10:11 AM / by Jake Sheets

0 Comments

Reach Your Audience With Scale Using JamLoop's Purpose-Built OTT/CTV Advertising Platform

JamLoop is an OTT advertising platform that empowers advertisers to reach their audience across 250+ premium streaming apps. With JamLoop, advertisers can create, manage and report their OTT campaigns with industry-leading dashboards and account managers.

JamLoop provides advertisers with a suite of powerful tools to reach their audience across multiple devices and platforms. Advertisers can take advantage of targeting options such as device type, operating system, location, age, and gender to deliver their ads to their target audience. JamLoop also provides detailed performance metrics and reporting to help advertisers measure and optimize their campaigns.

Our platform is an ideal choice for advertisers who want to reach their audience with scale and deliverability. Learn more about the benefits of JamLoop's OTT/CTV ad platform and the growth of Connected TV advertising.

[Read More →](#)



JamLoop

Target Local Audiences

CTV advertising can be used for local targeting by targeting specific geographic areas through the use of device-level geolocation technology.

DEAL DIRECT WITH THE CTV AD PLATFORM
jamloop.com

The graphic has a dark grey background with a large red location pin icon on the right. It includes the JamLoop logo, the title 'Target Local Audiences', a descriptive paragraph about CTV advertising and geolocation, and a footer with the text 'DEAL DIRECT WITH THE CTV AD PLATFORM' and the website 'jamloop.com'.

Improve Your Local Targeting With CTV Advertising

📅 Dec 22, 2022 11:23:11 AM / by Jake Sheets

💬 0 Comments

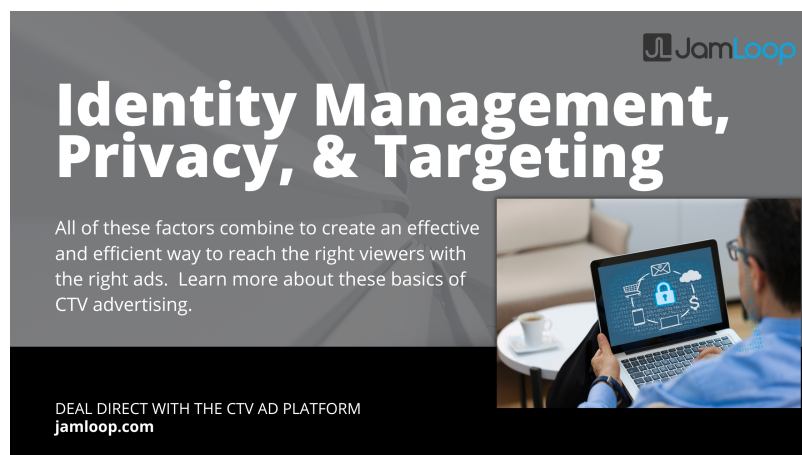
CTV Brings More Localization and Personalization To Your Ad Campaigns

CTV advertising can be used for **local targeting** by targeting specific geographic areas through the use of device-level geolocation technology. This technology allows advertisers to pinpoint the exact location of viewers in order to deliver their ads to a specific audience. By using this technology, advertisers can target their ads to viewers in a particular city, state, or even zip code. This allows for more precise targeting of customers that are more likely to be interested in the advertiser's product or service.

Another way to use CTV advertising for local targeting is to use **demographic targeting**. This type of targeting enables advertisers to target specific audiences based on their age, gender, income level, marital status, and other demographic characteristics. By targeting specific audiences, advertisers can ensure that their ads reach the right people.

CTV advertising can also be used for local targeting by utilizing **contextual targeting**. This type of targeting allows advertisers to target specific types of content that their ads may appear alongside. For example, an advertiser may target viewers who are watching sports programming by displaying their ads during or after a sports game. JamLoop's curated ad inventory is built from over 250 partnerships with highly trusted and popular media companies and suppliers. This guarantees that your advertising campaigns only run in qualified placements.

[Read More →](#)



CTV Advertising: Identity Management, Privacy, and Targeting

📅 Dec 13, 2022 7:40:39 AM / by Jake Sheets

💬 0 Comments

CTV Advertising Is Disrupting The Digital Ad Space. Learn The Basics on Targeting and Privacy

CTV (Connected TV) ads are digital ads that are targeted to viewers who are watching streaming content on their connected TVs. CTV ads are placed in the ad breaks of streaming content and can be targeted to specific audiences based on their viewing habits. The ads can be tailored to the viewer's interests, location, and even device type.

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2023's Forecasts For Connected TV (CTV) Advertising

📅 Dec 8, 2022 10:38:03 AM / by Jake Sheets

💬 0 Comments

OTT/CTV Advertising Continues To Gain Momentum From Major and Mid-Market Companies

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How Advertisers Are Winning With Ad Supported Streaming Platforms

📅 Dec 2, 2022 8:22:59 AM / by Jake Sheets

💬 0 Comments

As more people change their spending habits and cut the cord for streaming platforms, there is tremendous excitement for ad-supported streaming content. Major streaming platforms like Netflix and Disney+ have announced plans for an ad-supported tier to attract more subscribers and advertisers to their platforms.

In 2022, half of the streamers in the US use at least one free ad-supported service and as a result the investments on OTT/CTV ads made by brands and agencies have doubled since 2020. According to the IAB, connected TV (CTV) and OTT ad spend is expected to reach \$20 billion by the end of this year.



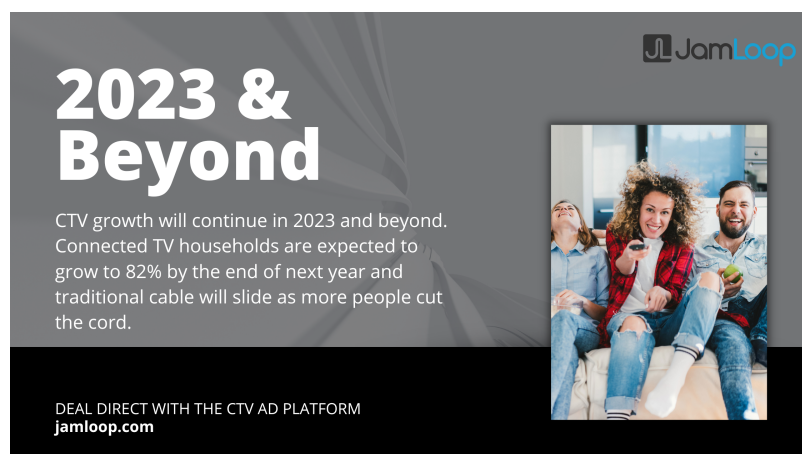
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Midterm Elections Bring \$1.5 Billion In OTT/CTV Advertising Spend

📅 Oct 31, 2022 11:45:00 AM / by Jake Sheets posted in CTV Advertising, OTT Advertising, Connected TV, Political

💬 2 Comments

Last week, The Current published an article stating a record \$9 billion will be spent on the 2022 midterm elections, compared to the \$4 billion spent in 2018. Connected TV or OTT/CTV advertising will take close to 20% of all political spend.

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2023 & Beyond: Connected TV's Bright Future

📅 Oct 20, 2022 1:00:00 PM / by Jake Sheets

💬 3 Comments

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Scale Up Your OTT/CTV Advertising for 2022 Holiday Shopping Season

📅 Oct 11, 2022 7:55:14 AM / by Jake Sheets

💬 0 Comments

According to a recent Insider Intelligence report, U.S. holiday sales are expected to surpass \$1 trillion and increase over 3% over 2021. E-commerce sales is expected to increase 15% and reach \$230 billion in total sales.

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CTV/OTT Leads TV Viewership Over Cable For The First Time

📅 Sep 22, 2022 11:00:00 AM / by Jake Sheets

💬 1 Comment

Connected TV Is Now #1 Across All US Households

Each year more and more households cut the cord while streaming subscriptions continue to rise. This turning point is an important moment for streaming companies and the CTV industry as a whole. TV measurement firm Nielsen recently published that in the summer of 2022, streaming platforms outperformed cable networks and experienced the largest share of U.S. TV viewing.

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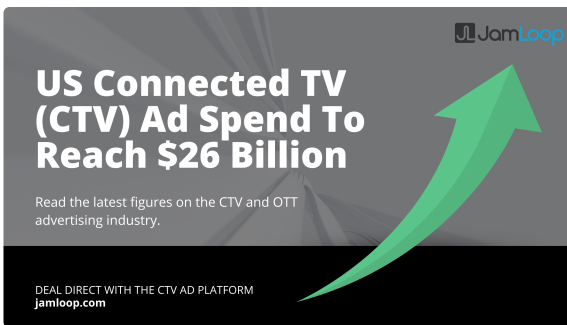
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posted at Jan 24, 2023



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posted at Jan 5, 2023



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posted at Dec 22, 2022



CTV Advertising: Identity Management, Privacy, and Targeting

posted at Dec 13, 2022

2023's Forecasts For Connected TV (CTV) Advertising

posted at Dec 8, 2022





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About Us

JamLoop is an OTT/Video Ad Platform company that helps media buyers reach cord-cutting audiences who are watching TV via streaming apps on any digital device.

[Learn More](#)

Contact Us

📞 925-322-0461

✉️ sales@jamloop.com

🏠 1261 Locust St. #72
Walnut Creek, CA 94596



Conner Edwards <cg.edwards53@gmail.com>

RCW 42.17A.345 Book Inspection Request (JamLoop)

Conner Edwards <cg.edwards53@gmail.com>
To: sales@jamloop.com

Wed, Nov 6, 2024 at 2:50 PM

Hello:

Per RCW 42.17A.345, I am requesting to view JamLoop's commercial advertising books of account.

See link for additional information: <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/commercial-advertiser-disclosure-guide> .

If you have questions about this request, you should call the PDC @ (360) 753-1111.

--

Best,

Conner Edwards
(425) 533-1677 cell

 **JamLoop Blog.pdf**
10472K

Complaint Against: Jamloop

Submitted: 11/8/24

Notice to Respondent by: 11/18/24 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 2/6/25 per RCW 42.17A.755(3)

Statutes Violated: RCW 42.17A.345, see also WAC 390-18-050

Background**Commercial Advertiser Disclosure Law**

Washington state law allows any member of the public to request information about a political advertisement from the company that provided the advertising.¹ These companies are referred to as “commercial advertisers” in the law.

This disclosure, which dates back 50 years to Initiative 276 which created the PDC, is an important counterpart to the reporting done by campaigns and sponsors of independent expenditures. It also provides critical information when sponsors of political advertising fail to identify themselves.

A commercial advertiser is defined as any person or entity that sells a service communicating messages or producing material for distribution to the public, when the message includes an appeal for votes or financial support in an election campaign.

Examples include, but are not limited to, print shops, copying center businesses, direct mail services, billboard companies, broadcasters, print or online publications and online digital platforms. See RCW 42.17A.005(10), RCW 42.17A.345 and WAC 390-18-050.

Violations

On November 6, 2024, I sent an e-mail to the respondent requesting to see their commercial advertising books of account. See attached.

I never received a response.

WAC 390-18-050(4)(b)(i) requires that the information required to be maintained by commercial advertisers must be provided “[b]y digital transmission, such as email, promptly upon request, but no later than two business days”.

A partial list of political expenditures made to the respondent can be found here:

https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/expenditures?recipient_name=Jamloop&expenditure_date=01%2F01%2F2019-yadcf_delim-

¹ <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/commercial-advertiser-disclosure-guide>

Conclusion

The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.

I am filing this complaint with the hopes that the PDC can rapidly bring the respondent into compliance with RCW 42.17A.345.

Best,

Electronically signed Conner Edwards

/s/ Conner Edwards

Complainant

Notice to Respondent

I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff with a so-called "warning letter".

This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.

What are these shortcomings?

Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.

I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.

Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: <https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/>

If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.

“The journey of a thousand miles begins with a single step.”
— Lao Tzu