

Respondent Name

Comcast/Xfinity

Complainant Name

Conner Edwards

Complaint Description**Conner Edwards**

reported via the portal
(Tue, 5 Nov 2024 at 11:48 AM)

Description of Complaint

See attached complaint.

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Overcomplicated and outdated requirements that are difficult to understand and comply with.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

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.



Conner Edwards <cg.edwards53@gmail.com>

Re: PDC - File a Formal Complaint - Conner Edwards

Conner Edwards <cg.edwards53@gmail.com>
To: PDC Support <pdcc@pdc.wa.gov>

Tue, Oct 8, 2024 at 8:04 PM

Absolutely, just filed it now. Can you confirm it was received by the agency? Is there any other additional information you need from me to process this complaint?

-Conner

On Tue, Oct 8, 2024 at 7:54 PM PDC Support <pdcc@pdc.wa.gov> wrote:
Conner Edwards,

Please file a new complaint that includes detail about what you allege is missing from the production that Comcast provided. Please also provide information about whether you notified the company about the missing information.

Kim Bradford

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Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission
<http://www.pdc.wa.gov>
1.360.753.1111

On Mon, 7 Oct at 12:03 PM , Conner Edwards <cg.edwards53@gmail.com> wrote:

External Email

Hi Kim:

I'm still not seeing this case on the PDC's enforcement tracking page. Is there something else you all need from me to move this case forward?

Please let me know and I'll try to get it to you as soon as possible.

-Conner

On Tue, Oct 1, 2024 at 1:29 PM Conner Edwards <cg.edwards53@gmail.com> wrote:
Hi Kim:

Yes, they did provide me with a .ZIP file on 8/26/24. The files provided did contain the videos which aired on Comcast but advertisements and related information were missing for a number of different candidates such as Jim Ferrell (2022), Sharon Shewmake (2022), Greenwood Neighbors Committee (2023), etc.

Do you want me to provide you with the .ZIP file? I will have to send it as a Google Drive link because of its size.

Please let me know if you need anything else from me to process the complaint against Comcast that I have already submitted.

-Conner

On Fri, Sep 20, 2024 at 2:18 PM PDC Support <pdcc@pdc.wa.gov> wrote:
Conner Edwards,

We were awaiting word from you about the results of emailing the local representative of Comcast.

Kim Bradford

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Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission
<http://www.pdc.wa.gov>
1.360.753.1111

On Fri, 20 Sep at 2:03 PM , Conner Edwards <cg.edwards53@gmail.com> wrote:

External Email

Hi Kim:

Is there anything else you need from me to process this complaint? I see that it hasn't been uploaded to the complaint page so I just wanted to see why that was.

-Conner

On Wed, Aug 14, 2024 at 3:37 PM PDC Support <pdcc@pdc.wa.gov> wrote:
Conner Edwards,

In the interest of getting you the records you need, please try to reach out to Comcast's local governmental affairs director, Rhonda Weaver: <https://accesshub.pdc.wa.gov/node/19871>. Let us know if you don't get a response.

Kim Bradford

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Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission
<http://www.pdc.wa.gov>
1.360.753.1111

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Best,

Conner Edwards
(425) 533-1677 cell



Conner Edwards <cg.edwards53@gmail.com>

RCW 42.17A.345 Book Inspection Request (Comcast)

Conner Edwards <cg.edwards53@gmail.com>
To: RHONDA_WEAVER@cable.comcast.com

Wed, Oct 30, 2024 at 2:57 PM

Hi Rhonda:

In the installment of records that Comcast provided me with, it was missing records relating to political advertising sponsored by Jim Ferrell (2022), Sharon Shewmake (2022), Greenwood Neighbors Committee (2023), and other committees.

Pursuant to WAC 390-18-050(5), I am requesting Comcast provide me with the records relating to the political advertising referenced above as well as any other political advertising that was reasonably identifiable to Comcast as political advertising or an electioneering communication.

-Conner

On Wed, Aug 14, 2024 at 4:09 PM Conner Edwards <cg.edwards53@gmail.com> wrote:

Hello: I am forwarding this request to you per the recommendation of PDC deputy director Kim Bradford.

Can you assist me?

Best,

Conner Edwards
(425) 533-1677 cell

----- Forwarded message -----

From: **Conner Edwards** <cg.edwards53@gmail.com>
Date: Mon, Jul 1, 2024 at 6:19 PM
Subject: RCW 42.17A.345 Book Inspection Request (Comcast)
To: <jennifer_khoury@comcast.com>, <sena_fitzmaurice@comcast.com>

Hello:

Per RCW 42.17A.345, I am requesting to view Comcast'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.

If I do not receive the records I am requesting by 5:00 PM PST on 7/4/24, I intend to file a complaint.

Best,

Conner Edwards

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Best,

Conner Edwards
(425) 533-1677 cell



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: Comcast × Expenditure Date: 01/01/2019-11/05/2024 ×

^ Hide Filters Search Tips

Candidate/Committee Name

Enter text X

Election Year

Select X

Campaign Type

Select X

Recipient Name

Comcast X

Expenditure Date

01/01/2019 11/05/2024 X

Amount

From To X

City

Enter text X

State

Select X

Description

Enter text X

Show 100 entries

[Download 911 rows as CSV.](#)

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ Jim Ferrell	2022	Candidate	COMCAST	10/26/2022	\$200,000.00	Paid to CERILLION N4 PARTNERS. Cable ads, 10/17-11/7
+ Ann Davison	2021	Candidate	COMCAST CABLE	10/14/2021	\$170,000.00	Paid to CN4 PARTNERS. Cable Advertising: 10/15-11/1
+ Sharon Shewmake	2022	Candidate	COMCAST	09/08/2022	\$125,056.00	Cable buy 9/9 - 11/6 2022
+ Salvador A. Mungia (Sal Mungia)	2024	Candidate	Comcast Interconnect	07/15/2024	\$85,000.00	Paid to NWP. TV Advertising 7/16-8/6
+ Greenwood Neighbors Committee	2023	Political Committee	Comcast	10/19/2023	\$85,000.00	TV Ads Supporting Cathy Moore and Opposing ChrisTiana ObeySumner 10/20 to 11/7
+ Dave Upthegrove (DAVID UPTHEGROVE)	2021	Candidate	COMCAST	10/04/2021	\$70,000.00	Paid to WINPOWER STRATEGIES. 10/11 - 10/18 and 10/25 - 11/02 ad buy
+ CITIZENS FOR LIBERTY AND LABOR	2023	Political Committee	Comcast	10/09/2023	\$68,000.00	Cable Ads 10/16 - 11/07
+ University Neighbors Committee	2023	Political Committee	Comcast	10/19/2023	\$59,500.00	TV Ads 10/17 - 11-7 Opposing Ron Davis and Supporting Maritza Rivera
+ Kelly M Chambers (Kelly Chambers)	2024	Candidate	Effectv/Comcast	07/12/2024	\$51,000.00	Cable ads; Seattle/Tacoma DMA 7/8 - 8/6
+ SOUTHWEST WA PRIORITIES Sponsored by Kennedy Fund	2024	Political Committee	Comcast	07/18/2024	\$50,000.00	Television Advertising: LD17/Harris/Oppose, 7/23-8/6
+ BETSY L. WILKERSON (Betsy Wilkerson)	2023	Candidate	COMCAST	10/12/2023	\$45,000.00	419 spots for first ad \$15,000; 360 spots for second ad \$20,000; run 10/16 - 11/7 on ESPN, TBSCFS1, ESPN2, RTNW, CMDY, FXNC, DISC-TV, TNT-TV, HGTV FOOD, HALL; streaming ads \$10,000
+ Salvador A. Mungia (Sal Mungia)	2024	Candidate	Comcast Interconnect	10/15/2024	\$43,083.10	Paid to NWP. TV Advertising Seattle Tacoma Zone 9/23-11/15 1,723,614 impressions

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ Downtown Neighbors Committee	2023	Political Committee	Comcast	10/24/2023	\$38,250.00	TV Ads Opposing Andrew Lewis 10/21 - 11/7
+ CITIZENS FOR LIBERTY AND LABOR	2024	Political Committee	Comcast	10/09/2024	\$34,000.00	Cable Ads 10/10 - 11/5
+ Drew C. MacEwen	2022	Candidate	COMCAST CORPORATION	06/22/2022	\$29,240.84	TV ads
+ Jackson Legacy Fund (JLF)	2024	Political Committee	Comcast	10/14/2024	\$27,499.00	TV Ads supporting Springer
+ Justice Not Jails	2023	Political Committee	Comcast Corporation	10/23/2023	\$26,350.00	Broadcast TV Ads running 10/20 - 11/6
+ Al French	2022	Candidate	MARKET VISION - COMCAST	10/21/2022	\$25,811.00	Comcast TV Buy
+ University Neighbors Committee	2023	Political Committee	Comcast	10/24/2023	\$25,500.00	TV Ads 10/25 - 11/7 Opposing Ron Davis and Supporting Maritza Rivera
+ James Dow Constantine (JAMES CONSTANTINE)	2021	Candidate	Comcast	07/27/2021	\$25,300.00	Paid to NWP Consulting. TV Ads 7/12-8/3
+ Kristen B. Wynne (Kristen Wynne)	2023	Candidate	Comcast	10/12/2023	\$25,000.00	Cable TV Ads; Tacoma & Click zones, 10/16-11/07
+ Al French	2022	Candidate	MARKET VISION - COMCAST	10/10/2022	\$21,569.00	Cable TV broadcasting
+ PRICE JOHNSON HELEN C (Helen Price Johnson)	2020	Candidate	COMCAST	11/02/2020	\$21,250.00	COMCAST,cable tv advertising 10/20 thru 11/2
+ Jim Ferrell	2022	Candidate	COMCAST	11/02/2022	\$20,000.00	Paid to COMCAST. cable ads 10/25-11/7
+ Daniel J Johnson Sr (Dan Johnson)	2022	Candidate	COMCAST TV	10/24/2022	\$20,000.00	Paid to MINNICK GROUP. cable TV ads Nov 1 - 8
+ Julianne Y. Gale	2022	Candidate	COMCAST	07/20/2022	\$20,000.00	TV ads, 7/25
+ Susanna Johnson	2023	Candidate	Comcast Corporation	10/17/2023	\$20,000.00	Media Buy: Cable in Snohomish Zone, Dates 10/18-11/7
+ Essential Workers for Lorena	2021	Political Committee	COMCAST EFFECTV	10/09/2021	\$18,000.00	Paid to JOAQUIN ROSS MEDIA. ad #2 opposing Bruce Harrell running Oct 13-Nov 1

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ Drew C. MacEwen (DREW MACEWEN)	2020	Candidate	COMCAST CORPORATION	09/25/2020	\$17,563.62	TV ADVERTISING
+ Drew C. MacEwen (DREW MACEWEN)	2020	Candidate	COMCAST CORPORATION	06/02/2020	\$17,527.00	TV CAMPAIGN PROMO
+ DARYA FARIVAR (Darya Farivar)	2022	Candidate	COMCAST	10/17/2022	\$16,992.35	Paid to PROGRESSIVE STRATEGIES NW LLC. Cable ad 10/17-11/7
+ Travis S. Couture (Travis Couture)	2024	Candidate	COMCAST/EFFECTV	07/08/2024	\$15,980.85	463 TV ads 7/15/2024-08/05/2024
+ Julie Anderson	2022	Candidate	COMCAST	10/21/2022	\$15,082.00	Paid to SERMO DIGITAL. Cable ads (CNN, MSNBC,FXNC,BRVO,TBSC)10/14-11/08
+ Seattle Neighbors Committee	2023	Political Committee	Comcast	11/02/2023	\$14,450.00	TV Ads Supporting Joy Hollngsworth 11/2 - 11/7
+ Salvador A. Mungia (Sal Mungia)	2024	Candidate	Comcast Interconnect	10/15/2024	\$13,050.05	Paid to NWP. TV Advertising Vancouver Zone 9/23-11/15 67,131 impressions
+ SEATTLE FIRE FIGHTERS PAC	2019	Political Committee	COMCAST	10/17/2019	\$13,040.00	248 TV ADS SUPPORTING WILLS CITY COUNCIL D6 10/14-11/03
+ Adam Bernbaum	2024	Candidate	Comcast - Effectv	07/23/2024	\$13,000.00	Effectv chosen, multiple stations play 30 second Ad. Run Dates: 7/24 - 8/6
+ Travis S. Couture (COUTURE TRAVIS S)	2022	Candidate	COMCAST/EFFECTV	09/26/2022	\$12,981.05	tv ads run from 10/12-11/06/2022
+ Travis S. Couture (COUTURE TRAVIS S)	2022	Candidate	COMCAST/EFFECTV	07/06/2022	\$12,722.80	tv advertising
+ Sharlett Mena (MENA SHARLETT)	2020	Candidate	COMCAST	07/14/2020	\$12,642.00	1005 DIGITAL TV AND CABLE TV SPOTS
+ ZACK ZAPPONE (Zack Zappone)	2021	Candidate	EFFECTV COMCAST	10/27/2021	\$12,500.00	commercials
+ Daniel G Griffey	2022	Candidate	COMCAST	09/09/2022	\$12,490.50	TV advertising
+ Daniel G Griffey	2022	Candidate	COMCAST	06/23/2022	\$12,008.60	TV advertising

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ Salvador A. Mungia (Sal Mungia)	2024	Candidate	Comcast Interconnect	10/15/2024	\$11,866.85	Paid to NWP. TV Advertising Spokane Zone 9/23-11/15 227,876 impressions
+ Molly Marshall	2024	Candidate	Comcast Corporation	10/09/2024	\$10,204.25	266,800 impressions via streaming services
+ Julie Anderson	2022	Candidate	COMCAST	10/31/2022	\$10,190.65	Paid to SERMO DIGITAL. Cable ads, Spokane region, 10/28-11/08
+ Karen Dill Bowerman	2020	Candidate	EFFECTV COMCAST	10/22/2020	\$10,015.00	TV ADVERTISING
+ Travis S. Couture (Travis Couture)	2024	Candidate	COMCAST/EFFECTV	10/09/2024	\$10,004.50	(qty883) TV Ads 10/15-11/03
+ Preeti Shridhar (PREETI SHRIDHAR)	2019	Candidate	COMCAST	07/18/2019	\$10,000.00	COMCAST (SEATTLE) - CABLE & STREAMING ADS: 7/17-8/6
+ Andrew Joseph Lewis (Andrew Lewis)	2023	Candidate	Comcast Cable TV	10/26/2023	\$10,000.00	TV Advertising 10/30 to 11/7
+ Susanna Johnson	2023	Candidate	Comcast Corporation	10/22/2023	\$10,000.00	Media Buy: Cable in Snohomish Zone, Dates 10/22-11/6
+ Drew C. MacEwen	2022	Candidate	COMCAST CORPORATION	10/14/2022	\$8,999.80	TV advertising
+ Travis S. Couture (COUTURE TRAVIS S)	2022	Candidate	COMCAST/EFFECTV	10/24/2022	\$8,003.60	Campaign TV ads run dates 10/26-11/06/2022 on comcast cable
+ Chris Nye (NYE CHRIS C)	2020	Candidate	COMCAST CORP CABLE SVCS	10/15/2020	\$8,002.75	CABLE ADS
+ Kyle Lyebedyev	2022	Candidate	COMCAST	11/19/2022	\$7,666.15	Paid to COMCAST. Cable ads 11/2-11/8
+ Daniel J Johnson Sr (Dan Johnson)	2022	Candidate	COMCAST TV	10/13/2022	\$7,437.50	Paid to MINNICK GROUP. cable tv ads
+ Daniel J Johnson Sr (Dan Johnson)	2022	Candidate	COMCAST TV	10/05/2022	\$7,437.50	Paid to MINNICK GROUP. CABLE TV ADVERTISING
+ Daniel J Johnson Sr (Dan Johnson)	2022	Candidate	COMCAST TV	10/18/2022	\$7,437.50	Paid to MINNICK GROUP. TV Ads Sept 26 - Oct 31

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ LISA J. BROWN (Lisa Brown)	2023	Candidate	Comcast	10/27/2023	\$7,000.00	169 spots run on ESPN (18), MNBC (21), TBSC (24), FS1 (18), TNT (17), HGTV (17), CNN (25), HALL (29)
+ Downtown Neighbors Committee	2023	Political Committee	Comcast	11/01/2023	\$6,375.00	TV Ads Opposing Andrew Lewis 11/2 - 11/7
+ Downtown Neighbors Committee	2023	Political Committee	Comcast	10/30/2023	\$6,375.00	TV Ads Opposing Andrew Lewis 11/1 to 11/7
+ Downtown Neighbors Committee	2023	Political Committee	Comcast	11/03/2023	\$5,100.00	TV Ads Opposing Andrew Lewis 11/4 - 11/7
+ Molly Marshall	2024	Candidate	Comcast Corporation	10/09/2024	\$5,100.00	Cable Ads - CNN, MSNBC, CNBC, HGTV, FOOD, HALL, LIFE, ESPN, TBS
+ Kelly M Chambers (Kelly Chambers)	2024	Candidate	Comcast Corp Cable Services	10/25/2024	\$5,100.00	Fox13 Broadcast TV Ad - 10/26
+ Daniel G Griffey (Dan Griffey)	2024	Candidate	COMCAST	10/07/2024	\$5,018.00	TV advertisement
+ LISA J. BROWN (Lisa Brown)	2023	Candidate	Comcast	10/16/2023	\$5,000.00	ESPN 14 spots, MSNBC 25 spots, TBSC 27 spots, FS1 26 spots, TNT 27 spots, HGTV 21 spots, CNN 26 spots, VOD/Streaming 32,609 impressions
+ LISA J. BROWN (Lisa Brown)	2023	Candidate	Comcast	10/24/2023	\$5,000.00	ads run 10/23 to 10/29: ESPN (13 spots), MNBC (21), TBSC (23), FS1 (19), TNT (20), HGTV (19), CNN (22). Total 137 spots
+ Demetria A. Chatters (Demi Chatters)	2023	Candidate	Comcast	10/27/2023	\$5,000.00	Comcast TV Advertising. Run time 10/30-11/7
+ Andrew Joseph Lewis (Andrew Lewis)	2023	Candidate	Comcast Cable TV	10/25/2023	\$5,000.00	Advertising from 10/21-11/7
+ Andrew Joseph Lewis (Andrew Lewis)	2023	Candidate	Comcast Cable TV	10/19/2023	\$5,000.00	Cable TV Advertising 10/20 to 11/7
+ Andrew Joseph Lewis (Andrew Lewis)	2023	Candidate	Comcast Cable TV	11/05/2023	\$5,000.00	TV Ad Buy running 11/3 to 11/7

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ Susanna Johnson	2023	Candidate	Comcast Corporation	10/24/2023	\$5,000.00	Media Buy: Cable in Snohomish Zone, Dates 10/22-11/6
+ Essential Workers for Lorena	2021	Political Committee	COMCAST EFFECTV	10/21/2021	\$4,500.00	Paid to JOAQUIN ROSS MEDIA. Ad #2 placement 2; 10/22-10/31oppose Bruce Harrell
+ SPOKANE COUNTY REPUBLICAN CENTRAL COMMITTEE	2022	Political Committee	COMCAST	04/20/2022	\$3,000.00	cable tv showing of ads for Primary Kickoff event
+ Eric Jon Dooyema (Eric Dooyema)	2022	Candidate	COMCAST	10/04/2022	\$3,000.00	Paid to THE CLARK COMPANY. Oct/Nov Ads
+ Adam Bernbaum	2024	Candidate	Comcast - Effectv	10/15/2024	\$3,000.00	TARGETED OTT TO LD 24 ZIPS: A35+, DEMOCRATS
+ STUCKART BEN T (Ben Stuckart)	2024	Candidate	Comcast Cable	07/01/2024	\$2,800.00	117x CNN CNBC MSNBC DISC FOOD HGTV ESPN NGC
+ Daniel G Griffey (Dan Griffey)	2024	Candidate	COMCAST	07/12/2024	\$2,693.00	TV advertising for primary
+ DARYA FARIVAR (Darya Farivar)	2022	Candidate	COMCAST	10/31/2022	\$2,125.00	Paid to PROGRESSIVE STRATEGIES NW LLC. Cable ad 10/27-11/6
+ Adam Bernbaum	2024	Candidate	Comcast - Effectv	10/15/2024	\$2,048.00	Subvendor: ESPN TV-cable ads, run dates 10/21 thru 11/4
+ Adam Bernbaum	2024	Candidate	Comcast - Effectv	10/22/2024	\$2,000.00	Subvendor: BTN TV-cable ads, run dates 10/26 thru 11/2
+ Adam Bernbaum	2024	Candidate	Comcast - Effectv	10/22/2024	\$2,000.00	Subvendor: BTN TV-cable ads, run dates 10/16 thru 11/5 (Port Angeles - Townsend)
+ STUCKART BEN T (Ben Stuckart)	2024	Candidate	Comcast Cable	06/03/2024	\$1,985.00	July Streaming prepaid 46,620 impressions
+ Adam Bernbaum	2024	Candidate	Comcast - Effectv	10/15/2024	\$1,966.00	Subvendor: ESPN TV-cable ads, run dates 10/21 thru 11/5 (Port Angeles - Townsend)
+ Daniel P Evans (Dan Evans)	2020	Candidate	EFFECTV COMCAST COMPANY	09/30/2020	\$1,882.75	TV ADS COMCAST

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
+ Greene Damian J (GREENE DAMIAN J)	2020	Candidate	A COMCAST PARTNER	09/26/2020	\$1,882.75	COMMERCIALS
+ LISA J. BROWN (Lisa Brown)	2023	Candidate	Comcast	10/10/2023	\$1,755.00	PAC12 Network 2 ad spots
+ Daniel J Johnson Sr (Dan Johnson)	2022	Candidate	COMCAST TV	10/18/2022	\$1,750.00	Paid to MINNICK GROUP. TV Ads Sept 26 - Oct 31
+ Drew C. MacEwen	2022	Candidate	COMCAST CORPORATION	10/27/2022	\$1,365.10	balance on TV advertising billing
+ Joshua Caleb Amato (Josh Amato)	2023	Candidate	Comcast / Effect TV	10/25/2023	\$1,364.59	Streaming ads; 98074 & 99075 zip code zones, 10/26 - 11/1
+ Colleen C. Echohawk (Colleen Echohawk)	2021	Candidate	Comcast	06/30/2021	\$1,030.45	Utilities
+ Marilyn S. Conniry- Beasley (Susan Conniry)	2021	Candidate	COMCAST	09/21/2021	\$1,003.00	CNN
+ Joshua Caleb Amato (Josh Amato)	2023	Candidate	Comcast / Effect TV	10/30/2023	\$1,000.00	TV ads; Bellevue-Issaquah zone, 11/1 - 11/7
+ Adam Bernbaum	2024	Candidate	Comcast - Effectv	10/22/2024	\$990.00	Subvendor: ESPNTV-cable ads, run dates 10/28 thru 11/4
+ Adam Bernbaum	2024	Candidate	Comcast - Effectv	10/15/2024	\$890.00	Subvendor: CNN TV-cable ads, run dates 10/21 thru 11/5 (Port Angeles - Townsend)
+ Adam Bernbaum	2024	Candidate	Comcast - Effectv	10/15/2024	\$853.00	Subvendor: TBSC TV-cable ads, run dates 10/21 thru 11/5
+ Pierce County Republican Party Non- Exempt	2019	Political Committee	COMCAST BUSINESS	12/23/2019	\$825.32	Internet/phone
+ Adam Bernbaum	2024	Candidate	Comcast - Effectv	10/15/2024	\$825.00	Subvendor: MNBC TV-cable ads, run dates 10/21 thru 11/5 (Port Angeles - Townsend)
+ Pierce County Republican Party Non- Exempt	2024	Political Committee	Comcast	08/02/2024	\$813.37	Internet/phone

Candidate/Committee Name	Election year	Campaign Type	Recipient Name	Expenditure Date	Amount	Description
HOUSE DEMOCRATIC + CAMPAIGN COMMITTEE (HDCC)	2021	Political Committee	Comcast Corp	04/15/2021	\$767.23	April and May internet

Showing 1 to 100 of 911 entries (filtered from 1,073,790 total entries)

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Re: PDC - File a Formal Complaint - Conner Edwards

PDC Support <pdcc@pdc.wa.gov>
 Reply-To: PDC Support <pdcc@pdc.wa.gov>
 To: cg.edwards53@gmail.com

Mon, Oct 21, 2024 at 1:56 PM

Conner Edwards,

In this complaint, you acknowledge that a commercial advertiser provided inspection of its records. You then allege that those books of account were missing some political advertising purchases, which you have specifically identified here. You further acknowledge that you have not notified the commercial advertiser of that alleged missing information.

WAC 390-18-050(5) provides that a commercial advertiser may have up to three business days to update its books of account upon receiving notice regarding any missing political advertising or electioneering communication, provided it asked the purchaser if the order included any political advertising or electioneering communication and the purchaser did not disclose that information. This cure period is an opportunity to correct any missing information before enforcement action is warranted.

The rules are designed to reasonably interpret and implement RCW 42.17A.345, which simply requires commercial advertisers to maintain books and make them available for public inspection. The law does not specify a request process for the public. That is instead provided in the rules, which should not be considered to be contradictory given that statute is silent.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and WAC 390-37-060(1)(a).

Kim Bradford

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Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission
<http://www.pdc.wa.gov>
 1.360.753.1111

On Tue, 8 Oct at 8:03 PM , Conner Edwards <cg.edwards53@gmail.com> wrote:

Description of Complaint

See attached. Per PDC staff's request I am refiling my complaint against Comcast.

The records provided by Comcast were incomplete, however they did provide me with a .ZIP file on 8/26/24. The files provided did contain the videos which aired on Comcast but advertisements and related information were missing for a number of different candidates/committees such as Jim Ferrell (2022), Sharon Shewmake (2022), Greenwood Neighbors Committee (2023), etc.

PDC staff requested that I indicate whether or not I sent an additional follow up communication with Comcast to request the missing records, which they have previously indicated they believe is required by WAC 390-18-050. The answer is no, and here is why staff's interpretation is incorrect.

As I understand it, an administrative rule (like WAC 390-18-050) can be used to clarify ambiguities in statutes but cannot be used to contradict or override a statute's plain meaning. RCW 42.17A.345 clearly provides that: "[commercial advertiser books of account] shall be open for public inspection during normal business hours during the campaign and for a period of no less than five years after the date of the applicable election."

The statute also indicates that these books of account must include: "[t]he names and addresses of persons from whom it accepted political advertising or electioneering communications... [t]he exact nature and extent of the services rendered and...

...[t]he total cost and the manner of payment for the services."

Under this statute, it is clear that commercial advertisers must provide the books of account with the legally required information upon receiving the initial request. Those requesting the commercial advertiser's books of account are not obligated under RCW 42.17A.345 to play a never-ending game of wack-a-mole to get the information they are entitled by statute to receive upon making the initial request.

The e-mail from staff could arguably be interpreted as the agency taking the opposite position: that those who inspect commercial advertiser books of account and believe information is missing must first be able to prove the existence of political advertising with some outside evidence, communicate that information to the commercial advertiser, and then wait three business days to receive this information. This is not what the statute requires.

The rule referenced by staff was adopted as part of a broader effort led by Director Lavallee to accommodate Meta and other large digital advertisers. The interpretation suggested by staff's e-mails on this subject would largely defeat a primary purpose of RCW 42.17A.345.

RCW 42.17A.345 provides individuals with an important tool to "double-check" that the information being disclosed by candidates and committees are accurate. If a member of the public wants to see if a candidate/committee is properly disclosing ad purchases on their C4s, they can make a request to inspect the commercial advertiser books of account to see that information. Under what appears to be the agency's possible interpretation of this WAC per staff's e-mails, a member of the public wishing to do this would be required to somehow prove the existence of this advertising first, which may very well be impossible for them to do.

Similarly, it is not possible for me to prove what additional information may be missing from Comcast's commercial advertising books of account. But it's not my obligation to prove that. It's Comcast's obligation to maintain accurate books of account under RCW 42.17A.345. They have failed to do so.

Complaint Against: Comcast/Xfinity

Submitted: 11/5/24

Notice to Respondent by: 11/15/24 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 2/3/25 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.

Comcast

Comcast Corporation, formerly known as Comcast Holdings, is an American multinational telecommunications and media conglomerate incorporated and headquartered in Philadelphia. It is the fourth-largest broadcasting and cable television company worldwide by revenue.

Over the last several election cycles, there have been numerous political expenditures reportedly having been made to Comcast. See attached.

See also link from PDC’s expenditure search database where Comcast is listed as a recipient of political committee funds: https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/expenditures?recipient_name=Comcast&expenditure_date=01%2F01%2F2019-yadcf_delim-11%2F05%2F2024

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

Violations

On 7/1/24, I reached out to Comcast to request via e-mail to inspect their commercial advertising books of account. I received no response and filed a PDC complaint against Comcast. See attached.

The complaint was not processed by the PDC, but Deputy Director Kim Bradford reached out to me and provided the contact information for Rhonda Weaver (RHONDA_WEAVER@cable.comcast.com). See attached.

On 8/14/24, I forwarded my original request to Rhonda Weaver, again requesting that Comcast provide their commercial advertising books of account. See attached.

On 8/26/24, Comcast provided what they purported to be their commercial advertising books of account via a FTP site, due to the large file size.

There were several records missing from their books of account.

On 10/8/24, I filed a new complaint against Comcast due to the records missing from their books of account. See attached.

On 10/21/24, PDC staff reached out to me to indicate they would not process this complaint because “you have not notified the commercial advertiser of that alleged missing information.” See attached.

On 10/30/24, I once again reached out to Rhonda Weaver to specifically request that the missing information be provided to me. More than 3 business days have passed between then and now and Comcast has not provided the requested records to me. See WAC 390-18-050(5).

For these reasons, I am once again filing a PDC complaint against Comcast with the hope that the PDC staff will actually process this complaint and not search for yet another reason to shirk their statutory responsibility to enforce the commercial advertiser statute. It has now been over four months since I made my original request.

Conclusion

Because of the rapidly approaching 2024 general election and my desire to view these records, I am unwilling to wait longer to see if the respondent complies with their statutory obligations. 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