

To Whom it May Concern –

It has come to my attention that Awareness Analytics Partners (A2P) has violated RCW 42.17A.435 by concealing the true recipient of committee expenditures. A2P was a vendor of the “No Tax on Jobs” campaign based in Seattle.

On June 1<sup>st</sup>, 2018, the “No Tax on Jobs” campaign made two separate expenditures to A2P: one expenditure totaling \$1250 for Facebook advertisements, and one expenditure totaling \$1250 for Twitter advertisements. To the best of their knowledge, the subvendor information was appropriately broken down by the committee pursuant to WAC 390.

Months later, *The Stranger* journalist Eli Sanders started investigating ad buys reported by campaign committees and comparing it to actual ad purchases disclosed to the public by commercial advertisers pursuant to RCW 42.17A.345. *See attachment*. Sanders found that – of the \$2500 reported as being spent by A2P on Facebook and Twitter ads - only \$374.81 was actually spent for the stated purpose of Facebook ads and no money was spent on Twitter ads. The rest of the money was simply kept by A2P in a practice known as “skimming”. The subvendor expenditures should never have been reported to the committee until the buys had actually taken place and the money had left A2P’s account.

It was only after Sanders’ reporting that A2P reimbursed the political committee. If A2P’s skimming had not been publically exposed, the firm would have simply pocketed the money that had been reported as going to Facebook and Twitter for ads.

In the Attorney General’s introduction to their lawsuit against Tim Eyman & Citizen Solutions LLC et.al, they write that: “contributors to initiative campaigns should know where their contributions go...”. Also according to that civil complaint, money was paid to a vendor (Citizen Solutions) for the ostensible purpose of signature gathering. Part of that money was then paid to Tim Eyman. Eyman then used this money for his own purposes, which went unreported. This is precisely what happened in the instant case.

It appears that A2P acted in such a manner so as to ensure that misleading and inaccurate campaign finance disclosure reports were filed by the political committee, in violation of RCW 42.17A.435. The reports were later amended after the truth came to light.

In launching an investigation into this matter, the PDC will send a message to political consultants all over Washington State that the practice of unreported “skimming” is illegal and must be immediately discontinued. Failing to investigate this matter would indicate that -- while unethical – skimming does not violate Washington State’s campaign finance laws.

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