



**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 • Website: www.pdcc.wa.gov

November 28, 2018

Delivered electronically to “phil@seattlecfo.com”

Subject: PDC Case 40480

Dear Philip Lloyd:

Below is a copy of an electronic letter sent to Conner Edwards concerning a complaint filed with the Public Disclosure Commission (PDC) regarding the No Tax On Jobs campaign.

As noted below to Conner Edwards, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter

If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Micaiah Ragins
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

November 28, 2018

Delivered electronically to “cg.edwards53@gmail.com”

Subject: Complaint regarding No Tax on Jobs, PDC Case 40480

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on August 31, 2018. Your complaint alleged that No Tax on Jobs, a 2018 City of Seattle ballot proposition committee registered with the PDC, may have violated RCW 42.17A.240 for failing to accurately disclose a detailed breakdown for a committee expenditure made to a vendor on the Summary Full Campaign Contribution and Expenditures (C-4 Report).

PDC staff reviewed your allegations, the statutes, rules and reporting requirements, the C-4 report filed by the No Tax on Jobs Committee (Committee), the response from the Committee, and the news article provided in your complaint. Based on staff's review, we found the following:

- On May 15, 2018, the No Tax On Jobs campaign filed a Committee Registration (C-1pc report) as a New 2018 ballot committee regarding the Referendum To Repeal Seattle Jobs Tax, selecting the Full Reporting Option, and listing Phillip Lloyd as Treasurer.
- On July 10, 2018, the Committee timely filed the June 2018 C-4 report covering the period from June 1 to 30, 2018 (Report# 100843226), disclosing three expenditures totaling \$5,000 made to Awareness Analytics Partners (A2P), and the expenditures included \$2,500 for digital media consulting, \$1,250 for Facebook advertising, and \$1,250.00 for Twitter advertising.
- On August 29, 2018, the Committee filed an amended June 2018 C-4 report amending the information for the three expenditures made to A2P, disclosing the same \$2,500 for digital media consulting, reduced the amount of the Facebook advertisements to \$374.81, and removed the expenditures for Twitter advertisements. The amended C-4 report disclosed a \$2,125 expenditure to A2P for a digital media deposit refund.
- On August 30, 2018, an article in The Stranger reported that the No Tax On Jobs campaign amended their campaign finance reports after being questioned why Twitter found no evidence that the political ads disclosed by the Committee as having been purchased by A2P.

- The Seattle City Council removed the proposed referendum from the ballot on June 12, 2018.
- The Committee received \$486,900 in contributions, and made \$447,870 in expenditures, with a cash on hand balance of \$39,030.

Based on these initial findings, staff has determined that in this instance, the No Tax on Jobs Committee failure to provide a detailed and accurate description for expenditures does not amount to a material violation warranting further investigation.

The No Jobs on Tax Committee made a minor error in providing the descriptions for two expenditures that were initially timely disclosed on the June 2018 C-4 report. The Committee filed an amended June 2018 C-4 report disclosing the updated information one day prior to your complaint being filed, making the necessary technical correction. The corrected information did not materially impact the public interest, since the amended report disclosed fewer political advertisements.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Micaiah Ragins
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: No Tax on Jobs campaign