

October 9, 2018

William B. Stafford  
BStafford@perkinscoie.com  
D +1.206.359.6217  
F +1.206.359.7217

**VIA E-MAIL**

Mx. Fox Blackhorn  
Compliance Coordinator 2  
Public Disclosure Commission  
711 Capitol Way, Room 206  
PO Box 40908  
Olympia, WA 98504-0908

**Re: Response to Complaint Filed by Eli Sanders**

Dear Mx. Blackhorn:

Thank you for providing Facebook, Inc. (“Facebook”) with an opportunity to respond to the September 25, 2018 complaint (“Complaint”) filed by Eli Sanders. The Complaint raises one issue related to Facebook’s compliance with Washington’s Public Disclosure Law—whether Facebook responded “promptly” to Mr. Sanders’ request for information under RCW 42.17A.345.

For the reasons more fully articulated below, Facebook’s Ad Archive provides access to the information listed in RCW 42.17A.345, and, by virtue of the Archive’s availability to the public, Facebook provided that information to Mr. Sanders promptly. Further, as the PDC is aware, Facebook shares the goal of increased transparency of political advertising and has been working in close consultation with the PDC and the Attorney General’s Office regarding the overall subject matter of Mr. Sanders’ complaint. For the reasons that follow, Facebook requests that the PDC dismiss Mr. Sanders’ Complaint. In the event the PDC believes that additional information is needed, Facebook welcomes the opportunity to discuss any questions that the PDC may have.

**A. Issue and Background**

In his Complaint, Mr. Sanders outlines his communications with Facebook, which began with an email to Facebook on May 29, 2018. In that email, Mr. Sanders asked to view, under RCW 42.17A.345, information relating to ads for a potential 2018 Seattle referendum for an Employee Hours Tax (often referred to as a “head tax”). Facebook responded the very next day, directing Mr. Sanders to Facebook’s Ad Archive, which contained information about the ads in question. In his Complaint, Mr. Sanders describes efforts to obtain additional information about the ads. Ultimately, he “request[s] that the PDC determine whether Facebook has responded ‘promptly’ in this instance.”

Facebook is committed to transparency in political advertising and has been working hard to make relevant and meaningful information available to the public. As one part of that effort, Facebook created the Ad Archive, which allows members of the public to view and search for advertisements identified as relating to politics or issues of national importance.<sup>1</sup> The Ad Archive goes beyond the requirements of Washington law in effect at the time relevant to the Complaint by including information regarding advertisements that address issues of importance *regardless* of whether they constitute “political advertising” or “electioneering communications,” as those terms are defined under Washington law.

The Ad Archive contains a wealth of information about each advertisement, including information about:

- a. The Facebook Page that is running the advertisement;
- b. Who the advertisement is “paid for by”;
- c. The content of the advertisement;
- d. Whether the advertisement is active or inactive;
- e. The duration of the advertisement (the date the ad first ran and an indication of whether it continues to run);
- f. The number of impressions of the advertisement, expressed as a range;
- g. The amount spent on the advertisement, expressed as a range; and
- h. Information regarding the demographic and geographic composition of the users who saw the advertisement, within the audience the advertiser selected.

The Ad Archive provides greater access and flexibility to requesting parties, in comparison to what advertisers have traditionally made available. To Facebook’s knowledge, advertisers have seldom been asked to make their records available for inspection, and when they have, the requesting party has been required to physically visit the advertiser’s office and has been shown physical copies of advertising orders. A requester based in Spokane, for example, would need to travel across the state to view records maintained by a radio station in Seattle.

Facebook’s Ad Archive eliminates this historical barrier. Any person can access the searchable Ad Archive at no cost through any device with internet access. At present, all one must do to view the Ad Archive is to enter the requester’s name and email address or phone number—and Facebook

---

<sup>1</sup> [https://www.facebook.com/ads/archive/?active\\_status=all&ad\\_type=political\\_and\\_issue\\_ads&country=US](https://www.facebook.com/ads/archive/?active_status=all&ad_type=political_and_issue_ads&country=US).

is continuing to look at ways to make access easier. Providing this limited information is less onerous than what people are required to do to access other public information, such as obtaining a public library card in Washington,<sup>2</sup> visiting office or governmental buildings,<sup>3</sup> or accessing public records from public entities.<sup>4</sup>

**B. Facebook Provided Promptly All Required Information About the Advertisements in Question**

Facebook provided more than sufficient information to the public and Mr. Sanders to comply with its obligations in this case.

*First*, the information Mr. Sanders requested is, in fact, included in the Ad Archive. The Seattle Ethics and Elections Commission’s (“SEEC”) followed up on Mr. Sanders’ request, specifically identifying the “No Tax on Jobs” campaign. That entity ran Facebook ads in late May and early June 2018. The content of these ads is in the Ad Archive, as is all the other information concerning the ads described above—including the duration of the ads, the number of impressions, and the amount spent on the ads.

*Second*, Facebook directed Mr. Sanders to the Ad Archive *the very next day* after it received his request, where he was able to access ads placed by and information related to the “No Tax on Jobs” campaign. This certainly qualifies as “promptly” responding under any reasonable reading of the term.

*Third*, as Mr. Sanders notes, subsequent to its receipt of Mr. Sanders’ original May 29 email, Facebook responded to the Executive Director of the SEEC, who requested additional back-up data supporting the information that is publicly available in the Ad Archive. Mr. Sanders’ complaint indicates that he received a copy of this information. We have attached another copy of the information produced by Facebook with this letter, as Exhibit A.

---

<sup>2</sup> See, e.g., The Seattle Public Library, Library Card Application, <https://www.spl.org/using-the-library/get-started/get-started-with-a-library-card/library-card-application> (library card registration requires photo ID, proof of address, and completion of application); Timberland Regional Library, Get a Library Card, <https://www.trl.org/cardapp> (library card for full library privileges requires showing a photo ID and proof of address).

<sup>3</sup> See, e.g., Visitors, Seattle Courthouse, United States District Court for the Western District of Washington, <http://www.wawd.uscourts.gov/visitors/seattle-courthouse> (official government-issued photo ID is required for entry).

<sup>4</sup> See, e.g., Attorney General of Washington, Consumer Protection Division, Request for Public Records, [https://agportal-s3bucket.s3.amazonaws.com/uploadedfiles/Home/About\\_the\\_Office/Open\\_Government/Request\\_AGO\\_Public\\_Records/CPRequestForm22018.pdf](https://agportal-s3bucket.s3.amazonaws.com/uploadedfiles/Home/About_the_Office/Open_Government/Request_AGO_Public_Records/CPRequestForm22018.pdf) (individual requester must provide his or her name, address, email address, telephone number, and describe records sought).

### **C. Mr. Sanders' Request Seeks to Apply the PDC's Emergency Rule Retroactively**

Even setting aside the fact that Facebook promptly provided the requested information by directing Mr. Sanders to the Ad Archive where the information he requested was available electronically, Mr. Sanders' Complaint should also be dismissed because he wrongly seeks to apply PDC's emergency rule retroactively.

As noted, Mr. Sanders sent his initial request to Facebook on May 29, 2018. At that time, digital communications platforms like Facebook were not subject to the provisions of RCW 42.17A.345. Rather, the law applied only to "commercial advertisers," which was defined to encompass only traditional print media.<sup>5</sup> On June 7, 2018, over a week after Mr. Sanders made his request to Facebook, an emergency rule promulgated by the PDC went into effect. *See* WAC 390-18-050. Among other things, for the first time, the emergency rule purports to apply the "commercial advertiser" requirements to "digital communications platforms" and sets out additional requirements regarding information to be maintained by digital communications platforms. The emergency rule also provided that a commercial advertiser may make records available for public inspection (a) in person; (b) "electronically promptly upon request"; or (c) "online on the advertiser's web site."

Mr. Sanders' Complaint seeks to apply that emergency rule retroactively. But under Washington law, legislative enactments are "presumed to apply prospectively only, and will not be held to apply retrospectively unless such legislative intent is clearly expressed or to be implied." *Baker v. Baker*, 80 Wn. 2d 736, 741, 498 P.2d 315, 318 (1972). The same is true for administrative rules. *See Elim Church of God v. Harris*, 722 F.3d 1137, 1141 (9th Cir. 2013) ("[A]dministrative rules will not be construed to have retroactive effect unless their language requires this result."). Nothing in the emergency rule states (or even implies) that it was intended to apply retroactively, and therefore it does not apply to Mr. Sanders' May 29, 2018 request or to Facebook's May 30, 2018 response. The Complaint should be dismissed for this reason alone.

### **D. The Washington Statute is Preempted by Federal Law**

The PDC should also dismiss the Complaint because of the broad immunity afforded Facebook under § 230 of the Communications Decency Act ("CDA"). *See* 47 U.S.C. § 230. That provision preempts state laws that seek to hold interactive computer service providers liable for publishing third-party content. 47 U.S.C. §§ 230(c)(1), (c)(3). Numerous courts, including the Ninth Circuit, have interpreted § 230 broadly to bar claims seeking to impose liability stemming from the

---

<sup>5</sup> "Commercial advertiser" means any person who sells the service of communicating messages or producing printed material for broadcast or distribution to the general public or segments of the general public whether through the use of newspapers, magazines, television and radio stations, billboard companies, direct mail advertising companies, printing companies, or otherwise." RCW 42.17A.005(11).

publication of third-party content or claims seeking to impose a duty on internet service providers to review and screen content prior to publication.<sup>6</sup>

CDA immunity applies here because Mr. Sanders' Complaint seeks to hold Facebook legally liable for publishing third party content. The duties imposed by the Campaign Law would require Facebook to review and monitor the content of every proposed advertisement prior to publication to determine whether the piece of advertising qualifies as "political advertising" or "electioneering communications" within the meaning of the statute. If the content qualifies as such, the Campaign Law requires Facebook to collect certain information and make that information available to the public and the PDC. *See e.g.* RCW 42.17A.345(1). If Facebook does not or cannot collect that information, it must remove the third-party advertisement from its platform. Numerous courts have concluded that § 230 preempts state laws in similar circumstances because an interactive service provider cannot be liable for carrying out traditional editorial functions, such as reviewing user-generated content and determining whether to publish it.<sup>7</sup> As the Ninth Circuit has recognized, a claim that a website "failed to review each user-created profile to ensure that it" did not violate the law is "precisely the kind [] for which Congress intended to grant absolution with the passage of section 230."<sup>8</sup>

Section 230 immunity also applies because the allegations in the Complaint cannot be proven without reference to the third-party ads published by Facebook. Put another way, the Washington law seeks to impose liability on Facebook for its publication of political content in user-generated advertisements; but for that content, there would be no storage or disclosure obligation triggered under Washington law. *See* RCW 42.17A.345. Courts have consistently held that where a plaintiff must resort to third-party content to establish the essential elements of its claims, including causation, such claims are barred by § 230 of the CDA.<sup>9</sup> That key principle applies with equal force here.

---

<sup>6</sup> *See, e.g., Caraccioli v. Facebook, Inc.*, 700 F. App'x 588, 590 (9th Cir. 2017); *Barnes v. Yahoo!, Inc.*, 570 F.3d 1096, 1102 (9th Cir. 2009); *Jones v. Dirty World Entm't Recordings LLC*, 755 F.3d 398, 407 (6th Cir. 2014) (quoting *Zeran*, 129 F.3d at 330); *see also, e.g., Ricci v. Teamsters Union Local 456*, 781 F.3d 25, 27–28 (2d Cir. 2015); *Nemet Chevrolet, Ltd. v. Consumeraffairs.com, Inc.*, 591 F.3d 250, 254 (4th Cir. 2009); *Bennett v. Google, LLC*, 882 F.3d 1163, 1164 (D.C. Cir. 2018).

<sup>7</sup> *See Caraccioli*, 700 F. App'x at 590; *Jones v. Dirty World Entm't Recordings LLC*, 755 F.3d 398, 407 (6th Cir. 2014) (quoting *Zeran*, 129 F.3d at 330); *see also, e.g., Ricci*, 781 F.3d at 27–28; *Klayman v. Zuckerberg*, 753 F.3d 1354, 1357 (D.C. Cir. 2014); *Nemet Chevrolet, Ltd.*, 591 F.3d at 254; *Bennett v. Google, LLC*, 882 F.3d 1163, 1164 (D.C. Cir. 2018).

<sup>8</sup> *Fair Hous. Council of San Fernando Valley v. Roommates.com*, 521 F.3d 1157, 1172 (9th Cir. 2008) (en banc).

<sup>9</sup> *See, e.g., Gonzalez v. Google, Inc.*, 282 F. Supp. 3d 1150, 1165, 1170–71 (N.D. Cal. 2017) (holding that § 230 CDA immunity applied and explaining that "[i]f the court were to apply Plaintiffs' logic and ignore the content of any ISIS-related YouTube postings in construing Plaintiffs' claims, it would be impossible to discern a causal basis for Google's alleged responsibility for the terrorist attacks"); *Cohen v. Facebook, Inc.*, 252 F. Supp. 3d 140, 157–58 (E.D.N.Y. 2017) (noting that when claims "rely on content to establish causation" the service provider's "role in publishing that

For those reasons, as applied to interactive computer services like Facebook, RCW 42.17A.345 is preempted by § 230, and thus Mr. Sanders' Complaint has no proper legal foundation.

#### **E. Conclusion**

Facebook has invested and continues to invest substantial time and resources to create and improve its Ad Archive, which provides easily-accessible information to the public about advertising concerning political activity and other issues of national importance.

In this instance, Facebook responded promptly to Mr. Sanders' request by directing him to its Ad Archive, an online resource containing information about the advertising in question. When the SEEC reached out to Facebook regarding Mr. Sanders' request, Facebook worked with the SEEC to provide a further production of information, which it understands was shared with Mr. Sanders. Facebook has complied fully with any legal obligations it may have and respectfully requests that the PDC dismiss the Complaint.

Facebook notes that the issues raised in Mr. Sanders' Complaint are similar to those raised in a previous complaint made by Conner Edwards. The issues raised in that complaint, as set out in a Complaint subsequently filed by the Attorney General's Office that is pending in the Western District of Washington (the "Lawsuit"), are currently being addressed between Facebook and the Attorney General's Office. Facebook respectfully submits that in the event that the PDC does not dismiss Mr. Sanders' Complaint outright, it should defer its consideration of that complaint until after the resolution of the pending Lawsuit. Finally, please know that Facebook is committed to continuous improvement and refinement of its Ad Archive, and it welcomes the opportunity to collaborate with the PDC to advance shared interests in transparency in advertising while simultaneously respecting legitimate advertiser privacy interests.

---

content is ... an essential causal element of the claims ..., and allowing liability to be imposed on that basis would 'inherently require[] the court to treat the defendant as the publisher or speaker of content'" (internal quotation marks omitted); *Pennie v. Twitter, Inc.*, 281 F. Supp. 3d 874, 889–90 (N.D. Cal. 2017) ("Plaintiffs explicitly base their claims on the content that Hamas allegedly posts, because absent offending content, there would be no basis for even the frivolous causal connection that Plaintiffs have alleged between Defendants' services and the Dallas attack.").

Mx. Fox Blackhorn  
October 9, 2018  
Page 7

Very truly yours,



William B. Stafford

WBS

# **EXHIBIT A**



# ReadMe/Cover Information - 7 Sep, 2018 Production

The enclosed production includes a .pdf file regarding advertisements that were created between January 15, 2018 and June 15, 2017, by one Page which shares a name with a committee specified by the SEEC in its letter of August 1, 2018. The total spend for this Page during that time frame is \$374.81.

## Legend for Referenced Ad Terms

**Service** - Platform where page was run.

**Target** - Internal unique identification number for the page.

**Account Identifier** - Unique identification number for the page.

**Account Type** - Type of account produced.

**Generated** - Date and time stamp when data was pulled for this production.

**Date Range** - Time period for which data has been provided in the production.

**Ad Group** - A group of ads representing all versions an original "parent" ad. Each version is represented as an individual ad in this production.

**Start Date** - Date an ad was set to start appearing.

**End Date** - Date an ad was set to stop appearing. No end date indicates the ad would run until the budget was spent.

**Campaign ID** - Unique identification number for associated ad groups run during a time period as a campaign.

**Age/Gender Reach Per Percent** - Percentage of people in a specific demographic to whom the ads in the ad group were delivered. "Unknown" gender indicates the gender of the individual is unknown to Facebook.

**Region Reach Percent** - The state/geographic region in which the individuals to whom the ads in the ad group were delivered either live or were located.

**Impressions Range** - The number of times within a range an ad was displayed on the screens of target audience members.

**Version ID** - A unique identifier for an ad.

**Text** - The text displayed with an ad.

**Spend Range** - Amount of money that the advertiser was billed for the ad.

**Service** Facebook  
**Target** 1019329814882947  
**Account Identifier** 1019329814882947  
**Account Type** Page  
**Generated** 2018-09-05 22:18:21 UTC  
**Date Range** 2018-01-15 00:00:00 UTC to 2018-06-15 23:59:00 UTC  
**Ad Groups**

- Id** 23842805637680636
- Start Date** 2018-05-21 12:53:27 UTC
- End Date** 2018-05-31 12:50:50 UTC
- Campaign Id** 23842805637570636
- Age/Gender** 18-24 female 2%
- Reach Percent** 18-24 male 3%
  - 25-34 female 7%
  - 25-34 male 11%
  - 25-34 unknown 0%
  - 35-44 female 6%
  - 35-44 male 10%
  - 35-44 unknown 0%
  - 45-54 female 7%
  - 45-54 male 12%
  - 45-54 unknown 0%
  - 55-64 female 9%
  - 55-64 male 11%
  - 55-64 unknown 0%
  - 65+ female 12%
  - 65+ male 10%
  - 65+ unknown 0%
- Region Reach Percent** Washington 100%
- Version**
  - Id** 23842805637690636
  - Start Date** 2018-05-21 12:53:27 UTC
  - End Date** 2018-05-31 12:50:50 UTC
  - Impressions Range** 1000-4999
  - Text** It's time to fight back and repeal Seattle's head tax - lend your name to our petition by calling us at 206.455.2722 or emailing us at info@notaxonjobs.com

For more info visit <http://notaxonjobs.com/> -- Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111 --

**Spend Range** <100



**Version**

**Photo Id:** 2034694103417942:36e167f21fb2eac09a766d45cf8a4432  
**Id** 23842809686010636  
**Start Date** 2018-05-21 12:53:27 UTC  
**End Date** 2018-05-31 12:50:50 UTC  
**Impressions** <1000  
**Range**  
**Text** It's time to fight back and repeal Seattle's head tax - lend your name to our petition by calling us at 206.455.2722 or emailing us at info@notaxonjobs.com

For more info visit <http://notaxonjobs.com/> -- Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111 --

**Spend Range** <100



**Photo Id:** 2034694103417942:36e167f21fb2eac09a766d45cf8a4432

**Id** 23842804624340636  
**Start Date** 2018-05-20 17:37:38 UTC  
**End Date** 2018-06-02 17:32:16 UTC  
**Campaign Id** 23842804624170636  
**Age/Gender** 18-24 female 2%  
**Reach Percent** 18-24 male 5%  
 18-24 unknown 0%  
 25-34 female 5%  
 25-34 male 15%  
 25-34 unknown 0%  
 35-44 female 6%  
 35-44 male 15%  
 35-44 unknown 0%  
 45-54 female 7%  
 45-54 male 14%  
 45-54 unknown 0%  
 55-64 female 7%  
 55-64 male 10%  
 55-64 unknown 0%  
 65+ female 7%  
 65+ male 6%  
 65+ unknown 0%  
**Region Reach** Washington 100%  
**Percent**  
**Version**

**Id** 23842804624350636  
**Start Date** 2018-05-20 17:37:38 UTC  
**End Date** 2018-06-02 17:32:16 UTC  
**Impressions** 10000-19999  
**Range**

**Text** It's time to fight back and repeal Seattle's head tax - lend your name to our petition by calling us at 206.455.2722 or emailing us at [info@notaxonjobs.com](mailto:info@notaxonjobs.com)

For more info visit <http://notaxonjobs.com/> -- Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111 --

**Spend Range** 100-499



**Version**

**Photo Id:** 2034694103417942:36e167f21fb2eac09a766d45cf8a4432  
**Id** 23842809686420636  
**Start Date** 2018-05-20 17:37:38 UTC  
**End Date** 2018-06-02 17:32:16 UTC  
**Impressions** <1000  
**Range**  
**Text** It's time to fight back and repeal Seattle's head tax - lend your name to our petition by calling us at 206.455.2722 or emailing us at [info@notaxonjobs.com](mailto:info@notaxonjobs.com)

For more info visit <http://notaxonjobs.com/> -- Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111 --

**Spend Range** <100



**Photo Id:** 2034694103417942:36e167f21fb2eac09a766d45cf8a4432

**Id** 23842808847010636  
**Start Date** 2018-05-23 21:48:50 UTC  
**End Date** 2018-06-05 00:00:50 UTC  
**Campaign Id** 23842804624170636  
**Age/Gender**  
**Reach Percent**  
**Region Reach**  
**Percent**  
**Version**

**Id** 23842808847610636  
**Start Date** 2018-05-23 21:48:50 UTC  
**End Date** 2018-06-05 00:00:50 UTC  
**Impressions** <1000

**Range**

**Text** Help repeal Seattle's head tax by signing the petition! Visit your local library [Douglass-Truth Branch @ 2300 E. Yesler Way Seattle, WA] and sign in person. You can also call us at 206.455.2722, email us at [info@notaxonjobs.com](mailto:info@notaxonjobs.com), or visit: <http://notaxonjobs.com/> for more information. Ads paid for by No Tax on Jobs, PO Box 21091 Seattle, WA 98111

**Spend Range** <100



**Photo Id:** 1021444598004802

**Id** 23842808838960636  
**Start Date** 2018-05-23 21:35:23 UTC  
**End Date** 2018-06-05 00:00:23 UTC  
**Campaign Id** 23842804624170636  
**Age/Gender**  
**Reach Percent**  
**Region Reach**  
**Percent**  
**Version**

**Id** 23842808839660636  
**Start Date** 2018-05-23 21:35:23 UTC  
**End Date** 2018-06-05 00:00:23 UTC  
**Impressions** <1000  
**Range**

**Text** Help repeal Seattle's head tax by signing the petition! Visit your local library [Capitol Hill Branch @ 425 Harvard Ave E. Seattle, WA] and sign in person. You can also call us at 206.455.2722, email us at info@notaxonjobs.com, or visit: <http://notaxonjobs.com/> for more information. Ads paid for by No Tax on Jobs, PO Box 21091 Seattle, WA 98111

**Spend Range** <100





**Photo Id:** 1021443521338243

**Id** 23842805639250636  
**Start Date** 2018-05-21 12:55:51 UTC  
**End Date** 2018-05-31 12:53:58 UTC  
**Campaign Id** 23842805639140636  
**Age/Gender** 18-24 female 9%  
**Reach Percent** 18-24 male 11%  
 18-24 unknown 0%  
 25-34 female 13%  
 25-34 male 19%  
 25-34 unknown 0%  
 35-44 female 8%  
 35-44 male 12%  
 35-44 unknown 0%  
 45-54 female 5%  
 45-54 male 7%  
 45-54 unknown 0%  
 55-64 female 5%  
 55-64 male 4%  
 55-64 unknown 0%  
 65+ female 4%  
 65+ male 2%  
 65+ unknown 0%  
**Region Reach** Washington 100%  
**Percent**  
**Version** **Id** 23842805639260636  
**Start Date** 2018-05-21 12:55:51 UTC

**End Date**

2018-05-31 12:53:58 UTC

**Impressions** 5000-9999**Range****Text**

It's time to fight back and repeal Seattle's head tax - lend your name to our petition by calling us at 206.455.2722 or emailing us at info@notaxonjobs.com

For more info visit <http://notaxonjobs.com/> -- Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111 --

**Spend Range** <100**Version****Photo Id:** 2034694103417942:36e167f21fb2eac09a766d45cf8a4432**Id** 23842809686230636**Start Date** 2018-05-21 12:55:51 UTC**End Date** 2018-05-31 12:53:58 UTC**Impressions** <1000**Range****Text**

It's time to fight back and repeal Seattle's head tax - lend your name to our petition by calling us at 206.455.2722 or emailing us at info@notaxonjobs.com

For more info visit <http://notaxonjobs.com/> -- Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111 --

**Spend Range** <100



**Photo Id:** 2034694103417942:36e167f21fb2eac09a766d45cf8a4432

**Id** 23842811182100636  
**Start Date** 2018-05-25 18:15:44 UTC  
**End Date** 2018-06-01 00:00:23 UTC  
**Campaign Id** 23842811182060636  
**Age/Gender** 18-24 female 11%  
**Reach Percent** 18-24 male 13%  
 25-34 female 11%  
 25-34 male 23%  
 25-34 unknown 0%  
 35-44 female 5%  
 35-44 male 14%  
 45-54 female 3%  
 45-54 male 9%  
 55-64 female 1%  
 55-64 male 3%  
 55-64 unknown 0%  
 65+ female 3%  
 65+ male 3%  
**Region Reach** Washington 100%  
**Percent**  
**Version**

**Id** 23842811182350636  
**Start Date** 2018-05-25 18:15:44 UTC  
**End Date** 2018-06-01 00:00:23 UTC  
**Impressions** <1000  
**Range**

**Text** It's time to fight back and repeal Seattle's head tax! Lend your name to our petition by calling us at 206.455.2722 or emailing us at [info@notaxonjobs.com](mailto:info@notaxonjobs.com). For more information, visit <http://notaxonjobs.com/>.

\*\*Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111\*\*

**Spend Range**

&lt;100



## Time to fight back: Repeal Seattle's head tax

Given the anger borne of frustration, it wouldn't take long to get needed signatures for an initiative that could lead to a ban on...

[SEATTLETIMES.COM](http://SEATTLETIMES.COM)

**Photo Id:** 2034694103417942:5cafe0436f1bc5617396f7b601bdccf2

**Id** 23842812041820636  
**Start Date** 2018-05-26 21:29:14 UTC  
**End Date** 2018-06-01 00:00:11 UTC  
**Campaign Id** 23842804624170636  
**Age/Gender** 18-24 male 7%  
**Reach Percent** 25-34 female 7%  
 25-34 male 14%  
 35-44 female 14%  
 35-44 male 21%  
 45-54 male 7%  
 55-64 male 7%  
 65+ male 21%  
**Region Reach** Washington 100%

**Percent**  
**Version**

**Id** 23842812042070636  
**Start Date** 2018-05-26 21:29:14 UTC  
**End Date** 2018-06-01 00:00:11 UTC  
**Impressions** <1000

**Range**

**Text** Sign the petition to repeal Seattle's head tax! Signature gatherers

will be at the World Trade Center [2211 Elliott Ave., Suite 200 Seattle, WA 98121] where you can sign in person.

If you can't make it but want to fight back and lend your name to our petition call us at 206.455.2722 or email us at [info@notaxonjobs.com](mailto:info@notaxonjobs.com). For more information, visit <http://notaxonjobs.com/>.

\*Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111\*

**Spend Range** <100



**Photo Id:** 1022389991243596

**Id** 23842811189550636  
**Start Date** 2018-05-25 18:24:33 UTC  
**End Date** 2018-06-01 00:00:00 UTC  
**Campaign Id** 23842811189510636  
**Age/Gender** 18-24 female 1%  
**Reach Percent** 18-24 male 5%  
25-34 female 2%  
25-34 male 14%

35-44 female 3%  
 35-44 male 16%  
 35-44 unknown 0%  
 45-54 female 3%  
 45-54 male 17%  
 45-54 unknown 0%  
 55-64 female 6%  
 55-64 male 16%  
 65+ female 6%  
 65+ male 9%

**Region Reach** Washington 100%

**Percent Version**

**Id** 23842811189700636  
**Start Date** 2018-05-25 18:24:33 UTC  
**End Date** 2018-06-01 00:00:00 UTC  
**Impressions** <1000  
**Range**  
**Text** It's time to fight back and repeal Seattle's head tax! Lend your name to our petition by calling us at 206.455.2722 or emailing us at [info@notaxonjobs.com](mailto:info@notaxonjobs.com). For more information, visit <http://notaxonjobs.com/>.

**Spend Range** <100

\*\*Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111\*\*



**Photo Id:** 2034694103417942:36e167f21fb2eac09a766d45cf8a4432

**Id** 23842811168990636  
**Start Date** 2018-05-25 17:53:25 UTC  
**End Date** 2018-06-01 00:00:12 UTC  
**Campaign Id** 23842811168950636  
**Age/Gender** 18-24 female 1%  
**Reach Percent** 18-24 male 4%

	25-34 female 2%
	25-34 male 15%
	35-44 female 2%
	35-44 male 17%
	45-54 female 2%
	45-54 male 17%
	55-64 female 9%
	55-64 male 10%
	65+ female 11%
	65+ male 9%
<b>Region Reach</b>	Washington 100%
<b>Percent</b>	
<b>Version</b>	<b>Id</b> 23842811169200636
	<b>Start Date</b> 2018-05-25 17:53:25 UTC
	<b>End Date</b> 2018-06-01 00:00:12 UTC
	<b>Impressions</b> <1000
	<b>Range</b>
	<b>Text</b> It's time to fight back and repeal Seattle's head tax! Lend your name to our petition by calling us at 206.455.2722 or emailing us at <a href="mailto:info@notaxonjobs.com">info@notaxonjobs.com</a> . For more information, visit <a href="http://notaxonjobs.com/">http://notaxonjobs.com/</a> .
	**Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111**
<b>Spend Range</b>	<100



	<b>Photo Id:</b> 2034694103417942:36e167f21fb2eac09a766d45cf8a4432
<b>Version</b>	<b>Id</b> 23842811171000636
	<b>Start Date</b> 2018-05-25 17:53:25 UTC
	<b>End Date</b> 2018-06-01 00:00:12 UTC
	<b>Impressions</b> <1000
	<b>Range</b>
	<b>Text</b> It's time to fight back and repeal Seattle's head tax! Lend your name to our petition by calling us at 206.455.2722 or emailing us

at [info@notaxonjobs.com](mailto:info@notaxonjobs.com). For more information, visit <http://notaxonjobs.com/>.

\*\*Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111\*\*

**Spend Range** <100



**Photo Id:** 2034694103417942:36e167f21fb2eac09a766d45cf8a4432

**Id** 23842814703400636  
**Start Date** 2018-05-29 14:32:25 UTC  
**End Date** 2018-05-30 23:40:57 UTC  
**Campaign Id** 23842814702450636  
**Age/Gender** 18-24 female 13%  
**Reach Percent** 18-24 male 20%  
 25-34 female 20%  
 35-44 female 13%  
 35-44 male 7%  
 45-54 female 13%  
 45-54 male 7%  
 55-64 male 7%

**Region Reach** Washington 100%

**Percent**  
**Version**

**Id** 23842814706290636  
**Start Date** 2018-05-29 14:32:25 UTC  
**End Date** 2018-05-30 23:40:57 UTC  
**Impressions** <1000

**Range**

**Text** It's time to fight back and repeal Seattle's head tax! Lend your name to our petition by calling us at 206.455.2722 or emailing us at [info@notaxonjobs.com](mailto:info@notaxonjobs.com). For more information, visit <http://notaxonjobs.com/>.

\*\*Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA



98111\*\*

Spend Range &lt;100



**Version**

**Photo Id:** 2034694103417942:36e167f21fb2eac09a766d45cf8a4432  
**Id** 23842814706580636  
**Start Date** 2018-05-29 14:32:25 UTC  
**End Date** 2018-05-30 23:40:57 UTC  
**Impressions** <1000  
**Range**  
**Text** Sign the petition to repeal Seattle's head tax! Signature gatherers will be at the World Trade Center [2211 Elliott Ave., Suite 200 Seattle, WA 98121] where you can sign in person.

If you can't make it but want to fight back and lend your name to our petition call us at 206.455.2722 or email us at [info@notaxonjobs.com](mailto:info@notaxonjobs.com). For more information, visit <http://notaxonjobs.com/>.

**Spend Range** <100 \*Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111\*



**Photo Id:** 1022389991243596

**Id** 23842814702540636  
**Start Date** 2018-05-29 14:30:44 UTC  
**End Date** 2018-05-30 23:40:57 UTC  
**Campaign Id** 23842814702450636  
**Age/Gender** 18-24 female 3%  
**Reach Percent** 18-24 male 7%  
18-24 unknown 0%  
25-34 female 6%  
25-34 male 19%  
25-34 unknown 0%  
35-44 female 7%  
35-44 male 17%  
35-44 unknown 0%  
45-54 female 5%  
45-54 male 14%  
45-54 unknown 0%  
55-64 female 5%  
55-64 male 7%  
55-64 unknown 0%

	65+ female 5%
	65+ male 5%
	65+ unknown 0%
<b>Region Reach</b>	Alaska 0%
<b>Percent</b>	Arizona 0%
	California 0%
	Colorado 0%
	Connecticut 0%
	District of Columbia 0%
	Florida 0%
	Georgia 0%
	Hawaii 0%
	Idaho 0%
	Illinois 0%
	Indiana 0%
	Louisiana 0%
	Maryland 0%
	Michigan 0%
	Mississippi 0%
	Montana 0%
	Nebraska 0%
	Nevada 0%
	New Jersey 0%
	New York 0%
	Ohio 0%
	Oregon 0%
	Pennsylvania 0%
	South Dakota 0%
	Texas 0%
	Virginia 0%
	Washington 99%
<b>Version</b>	<b>Id</b> 23842814702550636
	<b>Start Date</b> 2018-05-29 14:30:44 UTC
	<b>End Date</b> 2018-05-30 23:40:57 UTC
	<b>Impressions</b> 1000-4999
	<b>Range</b>
	<b>Text</b> It's time to fight back and repeal Seattle's head tax! Lend your name to our petition by calling us at 206.455.2722 or emailing us at info@notaxonjobs.com. For more information, visit <a href="http://notaxonjobs.com/">http://notaxonjobs.com/</a> .
	**Ads paid for by No Tax on Jobs PO Box 21091 Seattle, WA 98111**
	<b>Spend Range</b> <100



**Photo Id:** 2034694103417942:36e167f21fb2eac09a766d45cf8a4432

**Id** 23842808852130636  
**Start Date** 2018-05-23 21:55:25 UTC  
**End Date** 2018-06-05 00:00:01 UTC  
**Campaign Id** 23842804624170636  
**Age/Gender** 18-24 female 2%  
**Reach Percent** 18-24 male 2%  
 25-34 female 12%  
 25-34 male 18%  
 35-44 female 7%  
 35-44 male 13%  
 45-54 female 6%  
 45-54 male 11%  
 45-54 unknown 1%  
 55-64 female 4%  
 55-64 male 6%  
 55-64 unknown 1%  
 65+ female 8%  
 65+ male 6%  
 65+ unknown 2%  
**Region Reach** Washington 100%  
**Percent**  
**Version**

**Id** 23842808852380636  
**Start Date** 2018-05-23 21:55:25 UTC  
**End Date** 2018-06-05 00:00:01 UTC  
**Impressions** <1000  
**Range**

**Text** Help repeal Seattle's head tax by signing the petition! Visit your local library [West Seattle Branch @ 2306 42nd Ave SW Seattle, WA] and sign in person. You can also call us at 206.455.2722, email us at [info@notaxonjobs.com](mailto:info@notaxonjobs.com), or visit: <http://notaxonjobs.com/> for more information. Ads paid for by No Tax on Jobs, PO Box 21091 Seattle, WA 98111

**Spend Range**

&lt;100

**Photo Id:** 1021447234671205

**Id** 23842808850730636  
**Start Date** 2018-05-23 21:52:48 UTC  
**End Date** 2018-06-05 00:00:51 UTC  
**Campaign Id** 23842804624170636  
**Age/Gender** 18-24 female 7%  
**Reach Percent** 18-24 male 11%  
 25-34 female 4%  
 25-34 male 14%  
 25-34 unknown 4%  
 35-44 male 11%  
 45-54 female 7%  
 45-54 male 14%  
 55-64 female 4%  
 55-64 male 7%  
 65+ female 7%  
 65+ male 11%  
**Region Reach** Washington 100%  
**Percent**  
**Version**

**Id** 23842808851360636  
**Start Date** 2018-05-23 21:52:48 UTC  
**End Date** 2018-06-05 00:00:51 UTC  
**Impressions**

**Range**

&lt;1000

**Text** Help repeal Seattle's head tax by signing the petition! Visit your local library [University Branch @ 5009 Roosevelt Way NE Seattle, WA] and sign in person. You can also call us at 206.455.2722, email us at info@notaxonjobs.com, or visit: <http://notaxonjobs.com/> for more information. Ads paid for by No Tax on Jobs, PO Box 21091 Seattle, WA 98111

**Spend Range** <100



**Photo Id:** 1021446728004589

**Id** 23842808849050636  
**Start Date** 2018-05-23 21:50:35 UTC  
**End Date** 2018-06-05 00:00:20 UTC  
**Campaign Id** 23842804624170636  
**Age/Gender** 18-24 male 4%  
**Reach Percent** 25-34 female 4%  
 25-34 male 8%  
 35-44 female 4%  
 35-44 male 8%  
 45-54 female 12%  
 45-54 male 16%  
 55-64 female 4%  
 55-64 male 16%  
 65+ female 8%

65+ male 16%

**Region Reach** Washington 100%

**Percent**

**Version**

**Id** 23842808849260636

**Start Date** 2018-05-23 21:50:35 UTC

**End Date** 2018-06-05 00:00:20 UTC

**Impressions** <1000

**Range**

**Text** Help repeal Seattle's head tax by signing the petition! Visit your local library [South Park Branch @ 8604 8th Ave S. Seattle, WA] and sign in person. You can also call us at 206.455.2722, email us at info@notaxonjobs.com, or visit: <http://notaxonjobs.com/> for more information. Ads paid for by No Tax on Jobs, PO Box 21091 Seattle, WA 98111

**Spend Range** <100



**Photo Id:** 1021445508004711

**Id** 23842808833400636

**Start Date** 2018-05-23 22:10:26 UTC

**End Date** 2018-06-05 00:00:26 UTC

**Campaign Id** 23842804624170636

**Age/Gender** 18-24 female 2%

**Reach Percent** 18-24 male 3%

25-34 female 6%

25-34 male 24%

35-44 female 4%

35-44 male 10%

45-54 female 4%

45-54 male 13%

55-64 female 6%

55-64 male 16%

65+ female 4%

65+ male 6%

**Region Reach** Washington 100%

**Percent**

**Version**

**Id** 23842808833770636

**Start Date**

2018-05-23 22:10:26 UTC

**End Date** 2018-06-05 00:00:26 UTC**Impressions** <1000**Range****Text** Help repeal Seattle's head tax by signing the petition! Visit your local library [Seattle Central Library @ 1000 4th Ave., Seattle, WA] and sign in person. You can also call us at 206.455.2722, email us at info@notaxonjobs.com, or visit: <http://notaxonjobs.com/> for more information. Ads paid for by No Tax on Jobs, PO Box 21091 Seattle, WA 98111**Spend Range** <100**Photo Id:** 1021440611338534