



**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

October 27, 2017

Delivered electronically to “jeffdavis@madisoncorp.biz”

Subject: PDC Case 26009

Dear Working Families:

Enclosed is a copy of a letter sent to L Sloane Winkes concerning a complaint filed with the Public Disclosure Commission (PDC) on October 9, 2017. The complaint alleged that you may have violated RCW 42.17A.335 for defamatory political advertising against Manka Dhingra campaign, and RCW 42.17A.320 for failure to include Sponsor ID on political advertising. A copy of the complaint was previously sent to you.

As noted in the letter to the complainants, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at fox.blackhorn@pdc.wa.gov.

Sincerely,

Fox Blackhorn
Compliance Coordinator

Endorsed by,

Peter Lavallee
Executive Director

Enclosure: Letter to L Sloane Winkes.



**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

October 27, 2017

Delivered electronically to: "lswinkes@gmail.com"

Subject: Complaint regarding Working Families (2), PDC Case 26009

Dear L Sloane Winkes:

The Public Disclosure Commission (PDC) has completed its initial review of the complaints you filed on October 9, 2017. Your complaint alleged that Working Families, or in the alternative the Leadership Council, may violated RCW 42.17A.335 for defamatory political advertising against Manka Dhingra campaign, and RCW 42.17A.320 for failure to include Sponsor ID on political advertising.

PDC staff reviewed your allegations, and as a result of staff's initial review, we found the following:

- These complaints were directed by PDC Staff to the Working Families as a result of the complainants' concerns about the Leadership Council, the Leadership Council's top contributor status to the Working Families, significant spending by the Working Families on social media, and Sponsor ID for the Working Families contained on every video and website linked from the fake Manka Dhingra Facebook page.
- While at the time that the complaints came in, the Facebook page itself had no Sponsor ID and professed to be Candidate Dhingra herself, per PDC Interpretation 07-04 on online political advertising: Sponsor ID for the Working Families was in every case located just one click away from the short text online advertisements.
- All videos linked from the Unofficial contain Sponsor ID and none can be shown by clear and convincing evidence of false statements of material fact, which might constitute libel or defamation per se under RCW 42.17A.335.

Based on these initial findings, staff has determined that in this instance, the Unofficial: Manka Dhingra Facebook page and linked videos do not amount to material violations warranting further enforcement.

The PDC has closed the matter, 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at fox.blackhorn@pdc.wa.gov.

Sincerely,



Fox Blackhorn
Compliance Coordinator

Endorsed by



Peter Lavalley
Executive Director

cc: Working Families, Respondent