



**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 26008

Dear Working Families:

Enclosed is a copy of a letter sent to five complainants concerning complaints filed with the Public Disclosure Commission (PDC) on October 9, 2017. The complaints alleged that you may have violated RCW 42.17A.335 for defamatory political advertising against the Manka Dhingra campaign, and RCW 42.17A.320 for failure to include Sponsor ID on political advertising. Copies of the complaints were 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. PDC Staff is reminding you about the importance of ensuring Sponsor ID is located on all political advertising, including Facebook advertising.

Further, PDC Staff also notes that "*the use of an assumed name for the sponsor of electioneering communications, independent expenditures, or political advertising [is] unlawful*" pursuant to RCW 42.17A.320(1). We hereby remind you to avoid potential confusion regarding the sponsorship of your communications.

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

Enclosure: Letter to the Complainants.



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October 27, 2017

Delivered electronically to:

“nduchast@hotmail.com”

“kateabutt@hotmail.com”

“sheril.don@fairpoint.net”

“lpathe@msn.com”

“hanna.floss@gmail.com”

Subject: Complaint regarding Working Families, PDC Case 26008

Dear Complainants:

The Public Disclosure Commission (PDC) has completed its initial review of the complaints you filed on October 9, 2017. Your complaints alleged that Working Families, or in the alternative the Leadership Council, may have violated RCW 42.17A.335 for defamatory political advertising against the 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 ostensibly purported to be Candidate Dhingra herself. In accordance with 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.
- As of October 24, 2017, the Facebook page is now listed as an Unofficial page, and contains Sponsor ID for the working families on the *About* tab.

Based on these initial findings, staff has determined that in this instance, the Unofficial: Manka Dhingra Facebook page does not amount to a material violation warranting further enforcement. PDC Staff is reminding the Working Families about the importance of consistently providing

Sponsor ID on all political advertising, and the need to avoid potential confusion regarding sponsorship.

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 Lavalée
Executive Director

cc: Working Families, Respondent