

1 Attorney General, therefore brings this action against Facebook to enforce the State’s campaign
2 finance and disclosure law, RCW 42.17A, and seeks relief under RCW 42.17A.750 and
3 42.17A.780, including civil penalties, costs and fees, and injunctive relief.

4 II. PARTIES

5 2.1 Plaintiff is the State of Washington (State) acting through the Washington State
6 Attorney General. Under RCW 42.17A.765, the Attorney General may bring civil actions in the
7 name of the State for violations of state campaign finance disclosure laws contained in
8 RCW 42.17A that have been referred by the Public Disclosure Commission (Commission).

9 2.2 Facebook is an online social media corporation and social networking service
10 headquartered in Menlo Park, California. According to its leadership, Facebook is a “technology
11 company,” not a media company.¹ As the term “commercial advertiser” is defined in
12 RCW 42.17A.005(10), Facebook is a commercial advertiser operating in the state of
13 Washington.

14 III. JURISDICTION AND VENUE

15 3.1 This Court has subject matter jurisdiction over the present case, in accordance
16 with RCW 42.17A. The Attorney General has authority to bring this action pursuant to
17 RCW 42.17A.765.

18 3.2 This Court has jurisdiction over Facebook, a commercial advertiser conducting
19 business in Washington State. Facebook accepted or provided political advertising in
20 Washington State in 2018 and 2019. The acts and omissions complained of in this Complaint
21 took place, in whole or in part, in King County.

22 3.3 Venue is proper in this Court pursuant to RCW 4.12.

24 ¹ See, e.g., Michelle Castillo, *Zuckerberg tells Congress Facebook is not a media company: ‘I consider us*
25 *to be a technology company,’* CNBC, Apr. 11, 2018, [https://www.cnbc.com/2018/04/11/mark-zuckerberg-](https://www.cnbc.com/2018/04/11/mark-zuckerberg-facebook-is-a-technology-company-not-media-company.html)
26 [facebook-is-a-technology-company-not-media-company.html](https://www.cnbc.com/2018/04/11/mark-zuckerberg-facebook-is-a-technology-company-not-media-company.html) (last visited Apr. 13, 2020); *Exclusive interview with*
Facebook’s Sheryl Sandberg, Axios, Oct. 12, 2017, [https://www.axios.com/exclusive-interview-facebook-sheryl-](https://www.axios.com/exclusive-interview-facebook-sheryl-sandberg-2495538841.html)
[sandberg-2495538841.html](https://www.axios.com/exclusive-interview-facebook-sheryl-sandberg-2495538841.html) (last visited Apr. 13, 2020).

IV. FACTUAL ALLEGATIONS

A. Foreign Interference in U.S. Elections

4.1 Four years ago, Russian government operatives exploited loopholes in U.S. campaign finance laws to “interfere[] in the 2016 presidential election in sweeping and systematic fashion.”²

4.2 As part of Russia’s multifaceted effort to interfere in the American political system, the Internet Research Agency (IRA)—a notorious Russian “troll” farm—conducted a vast social media propaganda campaign.³

4.3 As a centerpiece of that campaign, the IRA purchased thousands of political advertisements on Facebook, enabling it to reach tens of millions of Americans.⁴ The IRA used fake accounts to illegally spend more than \$100,000 in Facebook political ads without revealing their true, foreign source during the 2016 election, and has continued its social media propaganda efforts since the 2016 election.⁵

4.4 In 2018, the Washington Legislature amended the campaign finance statute to clarify that the definition of commercial advertiser encompasses persons selling paid internet or digital communications. The Commission amended its regulations to clarify the obligations of digital platforms such as Facebook that accept or provide political advertisements or electioneering communications on their platform.

4.5 When amending the campaign finance statute in 2018, the Legislature declared that “state campaign finance laws are intended to provide maximum transparency to the public

² Special Counsel Robert S. Mueller, III, *Report on the Investigation into Russian Interference in the 2016 Presidential Election* at 1, U.S. Dep’t of Justice (Mar. 2019), <https://www.justice.gov/storage/report.pdf> (last visited Apr. 13, 2020).

³ *Id.* at 14–25.

⁴ *Id.* at 25–26.

⁵ *Id.* at 25; *See, e.g.*, Aff. in Supp. of Crim. Compl. ¶¶ 48–50, ECF No. 2, *United States v. Elena Alekseevna Khusyaynova*, No. 1:18-MJ-464 (E.D. Va. Sept. 28, 2018) (alleging that IRA trolls targeted midterm election campaigns, including those of candidates Roy Moore, Nancy Pelosi, and Elizabeth Warren); David E. Sanger, *Dueling Narratives Emerge From Muddled Account of Russia’s 2020 Interference*, N.Y. Times (Feb. 26, 2020), <https://www.nytimes.com/2020/02/23/us/politics/russia-2020-election-interference.html>.

1 and voters so they may know who is funding political campaigns.”⁶ A prime sponsor stated that
2 the 2018 amendments sought to “bring[] dark money into the light” and that increased
3 transparency is important “because it creates informed voters, it reduces the possibility of
4 corruption, provides accountability for the people and organizations that are attempting to
5 influence our elections. In short transparency makes for a healthier democracy.”⁷

6 4.6 Emulating Russia’s tactics in 2016, other political actors—both foreign and
7 domestic—have continued to use social media advertisements in the 2020 election campaigns,
8 while adopting increasingly sophisticated tactics to conceal their true identities from the public.⁸
9 Social media represents a significant and growing medium for political advertising, particularly
10 in state and local campaigns.⁹

11 4.7 The State has a compelling interest in ensuring transparency and integrity in
12 Washington elections so that voters may learn the real source and nature of paid advertisements
13 targeting the electorate. RCW 42.17A.345 and WAC 390-10-050 help achieve that compelling
14 interest by requiring online and digital platforms to maintain records identifying the true
15 sponsors of advertisements seeking to influence state and local elections, and to make that
16 information and other relevant records for such advertisements available to the public on a timely
17 basis.

20 ⁶ E.S.H.B. 2938, 65th Leg., Reg. Sess., Laws of 2018, ch. 304, [http://lawfilesexternal.wa.gov/biennium/
21 2017-18/Pdf/Bills/Session%20Laws/House/2938-S.SL.pdf?cite=2018%20c%20304%20%A7%20](http://lawfilesexternal.wa.gov/biennium/2017-18/Pdf/Bills/Session%20Laws/House/2938-S.SL.pdf?cite=2018%20c%20304%20%A7%20).

22 ⁷ Sen. Andy Billig, Wash. Leg. Dist. 3, Jan. 10, 2018 Public Hearing before the Senate State Government,
Tribal Relations & Elections Committee.

23 ⁸ See, e.g., Kevin Roose, Sheera Frenkel & Nicole Perlroth, *Tech Giants Prepared for 2016-Style
Meddling. But the Threat Has Changed.*, N.Y. Times (Mar. 29, 2020), [https://www.nytimes.com/2020/03/29/
24 technology/facebook-google-twitter-november-election.html](https://www.nytimes.com/2020/03/29/technology/facebook-google-twitter-november-election.html).

25 ⁹ See, e.g., Michael Grothaus, *Facebook and TV dominate political ad spending, suggesting advertisers
think older voters are key to winning*, Fast Company, Feb. 12, 2020, [https://www.fastcompany.com/90463458/
26 facebook-and-tv-dominate-political-ad-spending-suggesting-advertisers-think-older-voters-are-key-to-winning](https://www.fastcompany.com/90463458/facebook-and-tv-dominate-political-ad-spending-suggesting-advertisers-think-older-voters-are-key-to-winning);
Erika Franklin Fowler, et al., *Political Advertising Online and Offline* (2018), [https://web.stanford.edu/~gimartin/
papers/Ads_Online_and_Offline_Working.pdf](https://web.stanford.edu/~gimartin/papers/Ads_Online_and_Offline_Working.pdf) (“Social media lowers barriers to entry and thereby exposes voters
to information about a broader set of candidates and offices.”).

1 **B. Washington Campaign Finance Statute and Its Requirements for Commercial**
2 **Advertisers**

3 4.8 In its campaign finance statute, Washington declares as a matter of public policy
4 “[t]hat political campaign and lobbying contributions and expenditures be fully disclosed to the
5 public and that secrecy is to be avoided.” RCW 42.17A.001(1). The statute further provides that
6 “the public’s right to know of the financing of political campaigns . . . far outweighs any right
7 that these matters remain secret and private.” RCW 42.17A.001(10). To these ends, the State’s
8 campaign finance and disclosure law “shall be liberally construed to promote complete
9 disclosure of all information respecting the financing of political campaigns.” RCW 42.17A.001.

10 4.9 To help achieve these interests, Washington’s campaign finance disclosure
11 statute requires commercial advertisers who have accepted or provided political advertising or
12 electioneering communications during an election campaign to maintain documents and books
13 of account that shall be open to the public for their inspection during normal business hours
14 during the campaign and for at least five years after the date of the applicable election.
15 RCW 42.17A.345(1).

16 4.10 These documents and books of account must include “(a) [t]he names and
17 addresses of persons from whom it accepted political advertising or electioneering
18 communications; (b) [t]he exact nature and extent of the services rendered; and (c) [t]he total
19 cost and the manner of payment for the services.” RCW 42.17A.345(1).

20 4.11 A “commercial advertiser” means
21 any person that sells the service of communicating messages or producing
22 material for broadcast or distribution to the general public or segments of the
23 general public whether through brochures, fliers, newspapers, magazines,
24 television, radio, billboards, direct mail advertising, printing, paid internet or
25 digital communications, or any other means of mass communications used for the
26 purpose of appealing, directly or indirectly, for votes or for financial or other
support in any election campaign.
RCW 42.17A.005(10).

1 4.12 “Political advertising” means “any advertising displays, newspaper ads,
2 billboards, signs, brochures, articles, tabloids, flyers, letters, radio or television presentations,
3 digital communication, or other means of mass communication, used for the purpose of
4 appealing, directly or indirectly, for votes or for financial or other support or opposition in any
5 election campaign.” RCW 42.17A.005(39).

6 4.13 “Electioneering communication” means “any broadcast, cable, or satellite
7 television, radio transmission, digital communication, United States postal service mailing,
8 billboard, newspaper, or periodical” that:

9 (i) Clearly identifies a candidate for a state, local, or judicial office either
10 by specifically naming the candidate, or identifying the candidate without using
the candidate’s name;

11 (ii) Is broadcast, transmitted electronically or by other means, mailed,
erected, distributed, or otherwise published within sixty days before any election
12 for that office in the jurisdiction in which the candidate is seeking election; and

13 (iii) Either alone, or in combination with one or more communications
identifying the candidate by the same sponsor during the sixty days before an
election, has a fair market value or cost of one thousand dollars or more.

14 RCW 42.17A.005(21)(a).

15 4.14 “Sponsor,” for purposes of an electioneering communication, independent
16 expenditure, or political advertising, “means the person paying for the electioneering
17 communication, independent expenditure, or political advertising. If a person acts as an agent
18 for another or is reimbursed by another for the payment, the original source of the payment is
19 the sponsor.” RCW 42.17A.005(46)(a).

20 4.15 “Person” means “an individual, partnership, joint venture, public or private
21 corporation, association, federal, state, or local governmental entity or agency however
22 constituted, candidate, committee, political committee, political party, executive committee
23 thereof, or any other organization or group of persons, however organized.”
24 RCW 42.17A.005(38).

1 **C. The Commission’s Regulations for Commercial Advertisers**

2 4.16 The Commission has promulgated regulations specifying the information that
3 commercial advertisers must maintain and disclose as part of the “exact nature and extent of the
4 services rendered” and how that information must be made available to the public.
5 RCW 42.17A.345(1)(b); *see also* RCW 42.17A.110(1) (authorizing the Commission to adopt
6 “rules to carry out the policies and purposes of this chapter”).

7 4.17 In 2018, the Commission amended its regulations to clarify that “commercial
8 advertisers” include “internet” entities that “sell[] the service of communicating
9 messages . . . for broadcast or distribution to the general public or segments of the general
10 public . . . for the purpose of appealing, directly or indirectly for votes or for financial or other
11 support in any election campaign.” WSR 18-24-074, § 390-18-050, filed Nov. 30, 2018, eff.
12 Dec. 31, 2018 (amending WAC 390-18-050).

13 4.18 In these regulations, the Commission requires commercial advertisers’ books of
14 account and related materials to be available for public inspection by any person and provided
15 (a) in person during normal business hours; or (b) if requested electronically, in machine
16 readable format and structured in a way that enables the data to be fully discoverable and useable
17 by the end user: (i) By digital transmission, such as email, promptly upon request; or (ii) By
18 online publication in one of the following formats: (A) On the advertiser’s primary website; or
19 (B) On a website controlled by the advertiser, created for purposes of publishing information
20 required by this section, if a link is prominently displayed on the advertiser’s primary web site
21 directing users to the website on which the information is provided. WAC 390-18-050(3)(a)-(b).

22 4.19 The Commission also requires that information regarding political advertising or
23 electioneering communications be made available within 24 hours of the advertisement’s initial
24 distribution or broadcast, and within 24 hours of any update or change to such information. The
25 information and books of account that must be maintained for open inspection pursuant to
26 RCW 42.17A.345 are: (a) the “name of the candidate or ballot measure supported,” “opposed,”

1 or “otherwise identified,” and whether the ad “supports or opposes the candidate or ballot
2 measure;” (b) the “name and address” of the “sponsor[s] . . . actually paying for the advertising
3 or electioneering communication,” including an entity’s “federal employee identification
4 number, or other verifiable identification, if any, . . . so that the public can know who paid for
5 the advertising or communication, without having to locate and identify any affiliated entities;”
6 (c) the advertisement’s “total cost” or “initial cost estimate if the total cost is not available upon
7 initial distribution or broadcast,” as well as “how much of that amount has been paid, as updated,
8 who made the payment, when it was paid, and what method of payment was used;” and (d) the
9 “[d]ate(s) the commercial advertiser rendered service.” WAC 390-18-050(5)(a)-(d).

10 4.20 Finally, the Commission mandates that the “exact nature and extent of the
11 services rendered” for ads on digital communication platforms must include a “description of
12 the demographic information (e.g., age, gender, race, location, etc.) of the audiences targeted
13 and reached,” but only “to the extent such information is collected by the commercial advertiser
14 as part of its regular course of business.” WAC 390-18-050(6)(g). The records must also include
15 “the total number of impressions generated by the advertisement [or] communication.” *Id.*

16 **D. The State’s Prior Lawsuit Against Facebook for Campaign Finance Violations**

17 4.21 In April 2018, the Washington Attorney General’s Office received a citizen
18 action notice reporting that Facebook had violated RCW 42.17A.345 by failing to maintain the
19 required books of account and statutorily required information for political advertisements
20 sponsored in Washington elections it had accepted and or provided on its platform and by failing
21 to make such books of accounts or documents available for public inspection when requested.

22 4.22 On June 4, 2018, the State filed a Complaint alleging that Facebook had
23 continuously violated RCW 42.17A.345 from 2013 through the date of the Complaint during
24 which it had received hundreds of thousands of dollars in payments for political advertisements
25 it had accepted or provided on its platform for Washington elections.
26

1 4.23 On October 18, 2018, the Washington Attorney General’s Office received a
2 referral from the Commission’s staff for additional alleged violations of RCW 42.17A.345 by
3 Facebook.

4 4.24 On November 30, 2018, the State amended its Complaint against Facebook to
5 include the additional violations identified in the Commission Staff’s October 18, 2018 referral
6 letter. A copy of the State’s Amended Complaint against Facebook that was filed on
7 November 30, 2018 is attached hereto as Exhibit A.

8 4.25 On December 18, 2018, Facebook entered into a stipulated judgment with the
9 State to resolve Facebook’s alleged violations of RCW 42.17A.345 through November 30, 2018.
10 Under the terms of the stipulated judgment, Facebook agreed to pay the State \$200,000.00 as a
11 civil penalty and an additional \$38,500.00 for the State’s reasonable attorneys’ fees, court costs,
12 and costs of investigation. A copy of the State’s Stipulated Judgment against Facebook entered
13 by the King County Superior Court on December 18, 2018 is attached hereto as Exhibit B.

14 4.26 Soon thereafter, on December 27, 2018, Facebook announced that it would “not
15 accept ads that relate to Washington’s state or local elected officials, candidates, elections or
16 ballot initiatives” while it looked to address the amended Commission regulations set to take
17 effect on December 31, 2018.¹⁰ Facebook’s policy was neither required by the Stipulated
18 Judgment or any law, nor requested by the State. To the contrary, in the Stipulation Facebook
19 and the State expressed their “commitment to transparency in campaign finance and political
20 advertising[.]” Washington law promotes transparency not by seeking to proscribe, restrict, or
21 in any way regulate the content of political advertising, but merely by promoting disclosure of
22 its sources. In any event, despite Facebook’s purported policy, it continued to accept political
23 advertising and electioneering communications for state and local elections in Washington.

24
25 ¹⁰ Facebook Business, *New Rules for Ads That Relate to Politics in Washington State* (Dec. 27, 2018),
26 <https://www.facebook.com/business/news/new-rules-for-ads-that-relate-to-politics-in-washington-state> (last
visited Apr. 13, 2020).

1 **E. Facebook’s Subsequent Campaign Finance Violations**

2 4.27 Since November 30, 2018, Facebook has continued to sell advertising through its
3 advertising platform. Accordingly, Facebook remained a commercial advertiser as the term is
4 used in RCW 42.17A. Further, and notwithstanding its announced policy to no longer accept
5 political advertisements for Washington elections, Facebook continued to accept or provide
6 political advertising for election campaigns in Washington State after November 30, 2018. As
7 such, Facebook has been and is still required to comply with RCW 42.17A.345 and
8 WAC 390-18-050.

9 4.28 Nevertheless, Facebook failed to maintain all of the information required under
10 RCW 42.17A.345 and WAC 390-18-050 open for public inspection for numerous political
11 advertisements it accepted or provided after November 30, 2018 for Washington State election
12 campaigns.

13 4.29 Among the political advertisements for which Facebook failed to comply with
14 RCW 42.17A.345 and WAC 390-18-050 were those identified in a Complaint journalist
15 Eli Sanders filed with the Commission on February 21, 2019. In that Complaint, Mr. Sanders
16 identified political advertisements Facebook had accepted or provided in connection with four
17 Seattle City Council races and a Seattle ballot measure related to school funding. An example of
18 one ad identified in the Commission’s investigation of Mr. Sanders’s Complaint is attached
19 hereto as Exhibit C.

20 4.30 Nine days earlier, on February 12, 2019, Mr. Sanders had requested that
21 Facebook provide him with “all the information that Facebook is legally required to disclose”
22 under RCW 42.17A.345 and WAC 390-18-050 about the identified political advertisements.
23 Mr. Sanders filed the Complaint with the Commission after failing to receive a timely response
24 from Facebook.

25 4.31 In addition to failing to timely respond to Mr. Sanders, Facebook violated
26 RCW 42.17A.345 and WAC 390-18-050 by failing to maintain all required information for

1 public inspection within 24 hours after Facebook publicly displayed the political advertisements
2 identified by Mr. Sanders on its platform, or within 24 hours of any update or change to such
3 information.

4 4.32 Also among the political advertisements for which Facebook failed to comply
5 with RCW 42.17A.345 and WAC 390-18-050 were those identified in a Complaint
6 Tallman Trask filed with the Commission on July 24, 2019. In that Complaint, Mr. Trask
7 identified additional political advertisements that Facebook had accepted or provided in
8 connection with 2019 Seattle City Council campaigns. An example of one ad identified in the
9 Commission's investigation of Mr. Trask's Complaint is attached hereto as Exhibit D.

10 4.33 The previous day and then again on July 24, 2019, Mr. Trask requested that
11 Facebook provide him with the information required by RCW 42.17A.345 and
12 WAC 390-18-050 for these identified political advertisements. Facebook directed Mr. Trask to
13 the Facebook Ad Library, which included only some, but not all of the information required for
14 those political advertisements.

15 4.34 Facebook violated RCW 42.17A.345 and WAC 390-18-050 by failing to timely
16 provide Mr. Trask with the required information for the political advertisements he had
17 identified, which Facebook accepted or provided for election campaigns in Washington State.
18 Facebook further violated RCW 42.17A.345 and WAC 390-18-050 by failing to maintain all the
19 required information for each of those advertisements for public inspection within 24 hours after
20 the political advertisements were publicly displayed on Facebook's platform, or within 24 hours
21 of any update or change to such information.

22 4.35 The Commission's investigations of Mr. Sanders's and Mr. Trask's Complaints
23 concluded that Facebook had violated RCW 42.17A.345 and WAC 390-18-050.

24 4.36 On February 27, 2020, the Commission voted to refer the Sanders and Trask
25 Complaints to the Attorney General for enforcement pursuant to RCW 42.17A.755(4).
26

1 4.37 During the Commission’s investigations, Facebook confirmed hosting 269
2 political advertisements sponsored by the 12 campaigns identified in the Sanders and Trask
3 complaints.

4 4.38 Facebook identified \$19,619 in total payments for these advertisements.
5 Facebook also admitted that it does not make publicly available all of the information required
6 by RCW 42.17A.345 and WAC 390-18-050 for Washington political advertisements found on
7 its platform.

8 4.39 In addition to the 12 campaigns identified in Mr. Sanders’s and Mr. Trask’s
9 Complaints, at least 150 other Washington State candidate campaigns or political committees
10 reported to the Commission making \$505,382 in payments for Facebook advertising after
11 November 30, 2018. Due to Facebook’s widespread failure to comply, it is currently unknown
12 how many total political advertisements or electioneering communications these newly
13 identified campaigns or committees sponsored on Facebook with their collective ad buy of more
14 than half a million dollars.

15 4.40 The political advertisements for which Facebook failed to maintain all required
16 records span a wide range of campaigns from around the state, across the political spectrum, for
17 a variety of state and local offices—including State Representative, Port of Tacoma
18 Commissioner, Spokane City Councilmember, and Vancouver School District Director—as well
19 as ballot measures such as Initiative 1000 (and the related Referendum 88).

20 4.41 Due to Facebook’s widespread failure to comply, it is unknown how many
21 additional Washington political advertisements or electioneering communications Facebook
22 hosted that were not reported to the Commission—whether sponsored by noncompliant
23 campaigns, dark money sources, or other political actors. Facebook did not maintain and timely
24 make available for public inspection the records of those advertisements, as required by
25 RCW 42.17A.345 and WAC 390-18-050.
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1 **F. Facebook’s Terms of Service, Relevant Policies, and Consent to Disclose Advertiser**
2 **Information**

3 4.42 Facebook’s Advertising Policy notifies advertisers that their ads constitute public
4 advertising, and that detailed information concerning those ads will be shared with members of
5 the public, including through the Facebook Ad Archive (later called the Ad Library).¹¹ The
6 policy states:

7 Once displayed, ads are public information. Ads may be re-shared and accessed
8 outside of the targeted audience, including from the Facebook Page running the
9 ads or within Facebook Products. If users have interacted with your ad, your ad
10 may remain on Facebook products (for example, shared until the users delete it
11 or visible to users through their account tools). If your ad is a political ad, it will
12 be displayed in our Ad Archive. This means that Facebook may display (at no
13 cost to you) and provide access to the ad content and creative, as well as
14 information about the ad campaign (such as total spend and delivery data) for a
15 period of seven (7) years from the completion of your order.¹²

16 4.43 Facebook’s Advertising Policy further notifies ad sponsors that “Facebook may
17 disclose . . . advertising content, and all information associated with . . . advertising, to a
18 governmental entity or body if Facebook believes that disclosure would assist in a lawful
19 investigation.”¹³ The policy does not state that a subpoena or other formal process is required to
20 facilitate these disclosures.

21 4.44 Facebook’s Advertising Policy states that the policy applies “to (1) ads and
22 commercial content served by or purchased through Facebook, on or off the Facebook services,
23 including ads purchased under AAAA/IAB Standard Terms and Conditions, (2) ads appearing
24 within apps on Facebook, and (3) ads on Instagram.” The policy continues: “Your use of
25 Facebook’s advertising products and services is part of ‘Facebook’ under Facebook’s Statement
26 of Rights and Responsibilities (. . . the ‘SRR’) and is subject to the SRR.”¹⁴

24 ¹¹ *Advertising Policies*, Facebook (Mar. 25, 2020), <https://www.facebook.com/policies/ads/?ref=advertising-principles> (last visited Apr. 13, 2020).

25 ¹² *Id.*

26 ¹³ *Id.*

¹⁴ *Id.*

1 4.45 Facebook’s Statement of Rights and Responsibilities (SRR) states that the use of
2 Facebook is governed by the SRR, and that the SRR includes Facebook’s Advertising Policy.¹⁵

3 4.46 Facebook’s Commercial Terms also state that advertising placed on Facebook
4 Company Products must comply with Facebook’s Advertising Policy.¹⁶ The Commercial Terms
5 state further that if advertisers use Facebook’s self-service advertising creation interfaces for
6 “creation, submission and/or delivery of any advertising,” they must agree to Facebook’s
7 Self-Serve Ad Terms. In turn, the Self-Serve Ad Terms mirror the Advertising Policy’s
8 notification to advertisers that their ads are public information, that information concerning the
9 ad will be shared with the public, and that advertisers “consent that Facebook may disclose your
10 advertising content, and all information associated with your advertising, to a governmental
11 entity or body if Facebook believes that disclosure would assist in a lawful investigation.”¹⁷

12 4.47 Regarding disclosures of political advertising information to members of the
13 public, Facebook describes its Ad Library as a service not limited to Facebook subscribers, or
14 the intended audience of an ad sponsor: “The Ad Library provides advertising transparency by
15 offering a comprehensive, searchable collection of all ads currently running from across
16 Facebook Products, including Instagram. Anyone can explore the Library, with or without a
17 Facebook or Instagram account. You can access all active ads, even ones that may not have been
18 shown to you because you weren’t part of an advertiser’s intended audience.”¹⁸

19 V. CLAIMS

20 The State re-alleges and incorporates by reference all the factual allegations contained in
21 the preceding paragraphs, and based on those allegations, makes the following claims:
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23

24 ¹⁵ *Terms of Service*, Facebook, <https://www.facebook.com/legal/terms> (last visited Apr. 13, 2020).

25 ¹⁶ *Facebook Commercial Terms*, Facebook, https://www.facebook.com/legal/commercial_terms
(last visited Apr. 13, 2020).

26 ¹⁷ *Self-Serve Ad Terms*, Facebook, https://www.facebook.com/legal/self_service_ads_terms (last visited
Apr. 13, 2020).

¹⁸ *Facebook Ad Library*, Facebook, <https://www.facebook.com/ads/library> (last visited Apr. 13, 2020).

1 5.1 First Claim: The State reasserts the factual allegations made above and further
2 asserts that Facebook, in violation of RCW 42.17A.345 and WAC 390-18-050, failed to maintain
3 documents and books of account with statutorily required information for each political
4 advertisement or electioneering communication that Facebook accepted or provided for
5 Washington State election campaigns after November 30, 2018 open for public inspection. The
6 State asserts that Facebook further violated RCW 42.17A.345 and WAC 390-18-050 by failing
7 to timely provide all required information to Mr. Sanders and Mr. Trask for the Facebook
8 political advertisements or electioneering communications they identified.

9 5.2 Second Claim: The State reasserts the factual allegations made above and further
10 asserts that the actions of Facebook stated in the above claims were negligent and/or intentional.

11 **VI. REQUEST FOR RELIEF**

12 WHEREFORE, the State requests the following relief as provided by law:

13 6.1 For such remedies as the court may deem appropriate under RCW 42.17A.750,
14 including but not limited to imposition of a civil penalty, all to be determined at trial;

15 6.2 For all costs of investigation and trial, including reasonable attorneys' fees, as
16 authorized by RCW 42.17A.780;

17 6.3 For temporary and permanent injunctive relief, as authorized by
18 RCW 42.17A.750(1)(i), including an injunction requiring Facebook to maintain and make
19 available for public inspection all documents and books of account required by
20 RCW 42.17A.345 and WAC 390-18-050 for each political advertisement or electioneering
21 communication Facebook accepted or provided after November 30, 2018;

22 6.4 In the event the Court finds Facebook intentionally violated state campaign
23 finance disclosure laws, order any penalty assessed against Facebook to be trebled as authorized
24 by RCW 42.17A.780; and
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6.5 For such other legal and equitable relief as this Court deems appropriate.

DATED this 13th day of April 2020.

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EXHIBIT A

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**STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT**

STATE OF WASHINGTON, <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> FACEBOOK, INC., <p style="text-align: center;">Defendant.</p>		NO. 18-2-14129-0 SEA FIRST AMENDED COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A
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I. NATURE OF ACTION

The State of Washington (State) brings this action to enforce the state’s campaign finance and disclosure law, RCW 42.17A. Defendant Facebook, Inc. (Facebook), an online social media corporation, failed to maintain and make available for public inspection documents and books of account specifying statutorily required information concerning political advertising sponsored through Facebook’s online platform. On at least two occasions, Facebook failed to provide access to information required by law to members of the public. As a result, the State seeks relief under RCW 42.17A.765, RCW 42.17A.345, and WAC 390-18-050, including civil penalties, costs and fees, and injunctive relief.

II. PARTIES

2.1 Plaintiff is the State of Washington. Acting through the Washington State Attorney General, the State enforces the state campaign finance disclosure laws contained in RCW 42.17A.

2.2 Facebook is an online social media corporation and social networking service headquartered in Menlo Park, California. As the term is defined in RCW 42.17A.005(9),

1 Facebook is a commercial advertiser operating in the State of Washington. It accepted
2 compensation for the placement of political advertising on its platform.

3 III. JURISDICTION AND VENUE

4 3.1 This Court has subject matter jurisdiction over the present case, in accordance
5 with RCW 42.17A. The Attorney General has authority to bring this action pursuant to
6 RCW 42.17A.765.

7 3.2 This Court has jurisdiction over Facebook, a commercial advertiser conducting
8 business in the State of Washington. Facebook offered services and received payment from
9 persons placing political ads in Washington during each election year since 2013. The acts and
10 omissions complained of in this complaint took place, in whole or in part, in King County.

11 3.3 Venue is proper in this Court pursuant to RCW 4.12.

12 IV. FACTUAL ALLEGATIONS

13 4.1 RCW 42.17A declares as a matter of public policy “[t]hat political campaign and
14 lobbying contributions and expenditures be fully disclosed to the public and that secrecy is to be
15 avoided.” RCW 42.17A.001(1). The statute further provides that the state’s campaign finance
16 and disclosure law “shall be liberally construed to promote complete disclosure of all
17 information respecting the financing of political campaigns” RCW 42.17A.001.

18 4.2 RCW 42.17A.005(9) defines a “commercial advertiser” as “any person who sells
19 the service of communicating messages or producing printed material for broadcast or
20 distribution to the general public or segments of the general public whether through the use of
21 newspapers, magazines, television and radio stations, billboard companies, direct mail
22 advertising companies, printing companies, or otherwise.”

23 4.3 RCW 42.17A.005(36) defines “political advertising” to include “any advertising
24 displays, newspaper ads, billboards, signs, brochures, articles, tabloids, flyers, letters, radio or
25 television presentations, or other means of mass communication, used for the purpose of
26 appealing, directly or indirectly, for votes or for financial or other support or opposition in any

1 | election campaign.”

2 | 4.4 RCW 42.17A.005(42)(a) defines “sponsor” for the “purposes of an electioneering
3 | communications, independent expenditures, or political advertising means the person paying for
4 | the electioneering communication, independent expenditure, or political advertising. If a person
5 | acts as an agent for another or is reimbursed by another for the payment, the original source of
6 | the payment is the sponsor.”

7 | 4.5 RCW 42.17A.005(35) defines “person” as “an individual, partnership, joint
8 | venture, public or private corporation, association, federal, state, or local governmental entity or
9 | agency however constituted, candidate, committee, political committee, political party,
10 | executive committee thereof, or any other organization or group of persons, however organized.”

11 | 4.6 RCW 42.17A.345 requires each commercial advertiser who has accepted or
12 | provided political advertising or electioneering communications during an election campaign to
13 | maintain documents and books of account that shall be open to the public for their inspection
14 | during normal business hours during the campaign and for a period of no less than three years
15 | after the date of the applicable election. The law entitles any person, without reference to or
16 | permission from the Public Disclosure Commission, to inspect a commercial advertiser's
17 | political advertising or electioneering communications documents and books of account.
18 | Pursuant to WAC 390-18-050, the documents and books of account shall specify:

19 | (a) The name of the candidate or ballot measure supported or opposed or the name of the
20 | candidate otherwise identified;

21 | (b) The name and address of the person who sponsored the advertising or electioneering
22 | communication;

23 | (c) The total cost of the advertising or electioneering communication, how much of that
24 | amount has been paid, who made the payment, when it was paid, and what method of payment
25 | was used;

26 | (d) Date(s) the commercial advertiser rendered service; and

1 (e) A description of the major work components or tasks that were required to provide
2 the advertising or communications services.

3 4.7 Facebook sells advertising through its advertising platform, including political
4 advertising. Accordingly, Facebook is a commercial advertiser as the term is used in RCW
5 42.17A. As such, Facebook is required to comply with RCW 42.17A.345.

6 4.8 Since January 2008, candidates and political committees required to file
7 campaign disclosure reports with the Public Disclosure Commission have reported \$3.1 million
8 in payments related to political advertising on Facebook's online platform. These payments
9 included approximately \$2.5 million paid through political consultants and other agents or
10 intermediaries, and \$619,861 paid directly to Facebook.

11 4.9 As an example, during election year 2017, candidates and political committees
12 reported making \$857,893 in payments related to political advertising on Facebook's online
13 platform.

14 4.10 Facebook did not obtain or maintain all information required under
15 RCW 42.17A.345 of commercial advertisers.

16 4.11 For example, Facebook did not obtain or maintain the names and addresses of all
17 persons from whom it accepted political advertising.

18 4.12 Additionally, as an example, Facebook did not maintain the total cost and manner
19 of payment for services it provided for political advertising.

20 4.13 Facebook did not make open for public inspection during its normal business
21 hours during any campaign from 2013 through the present documents and books of account
22 containing information on political advertising for which it accepted payment and ran on its
23 platform.

24 4.14 For example, on November 30, 2017, Eli Sanders, Associate Editor of the
25 biweekly Seattle newspaper *The Stranger*, hand-delivered a letter to Facebook at its Seattle
26 office, seeking information concerning all political advertising Facebook accepted for the

1 August 1, 2017 primary election and November 7, 2017 general election in the City of Seattle.
2 Mr. Sanders' request cited a Seattle municipal law requiring commercial advertisers to produce
3 information that is also required to be produced under RCW 42.17A.345.

4 4.15 Mr. Sanders corresponded with Facebook seeking information, including a
5 December 27, 2017 email from Mr. Sanders to Facebook, copied to Facebook's outside counsel,
6 in which Mr. Sanders noted that Washington law imposes requirements on commercial
7 advertisers similar to the relevant Seattle ordinance. Mr. Sanders noted that these requirements
8 apply to advertising sponsored in all state and local campaigns in Washington.

9 4.16 At no point did Facebook provide information concerning political advertising in
10 Seattle municipal elections to Mr. Sanders in response to his November 30, 2017 request.

11 4.17 Facebook states that prior to May 2018, it did not collect the physical mailing
12 address of persons who paid to advertise on Facebook.

13 4.18 On April 8, 2018, Conner Edwards contacted Facebook's outside counsel via
14 email and requested an appointment on April 12, 2018 to inspect Facebook's documents and
15 books of account related to political advertising. Mr. Edwards cited RCW 42.17A.345 as the
16 basis of his request. Facebook's counsel acknowledged Mr. Edwards' email on April 10, 2018,
17 but did not promise that his request for an inspection on April 12, 2018 would be honored.

18 4.19 On April 12, 2018, Mr. Edwards visited Facebook's Seattle office as intended.
19 Facebook did not provide Mr. Edwards access to any documents and books of account
20 concerning political advertising placed on Facebook's online platform.

21 4.20 On April 11, 2018, the Attorney General received a citizen action notice from Mr.
22 Edwards concerning Facebook's failure to provide public access to the information required
23 under RCW 42.17A.345.

24 4.21 On May 29, 2018, Mr. Sanders again requested information from Facebook, this
25 time related to political advertising for a referendum pending in the City of Seattle. Mr. Sanders'
26 request cited a Seattle municipal law requiring commercial advertisers to produce information

1 as well as RCW 42.17A.345. While Facebook referred Mr. Sanders to an online “archive of ads”,
2 the archive did not contain all the information sought by Mr. Sanders and as required by state
3 law. The Public Disclosure Commission also sent an email to Facebook on or about July 25,
4 2018, seeking production of the requested information to Mr. Sanders. Facebook did not provide
5 Mr. Sanders all the required information in response to his May 29, 2018 request.

6 4.22 In reports filed with the Public Disclosure Commission, candidates and political
7 committees reported payments to Facebook for political advertising supporting or opposing
8 selected state and local candidates.

9 4.23 During the 2013 election, sponsors of political advertising confirmed a total of
10 \$129,099 in payments to Facebook for political advertising.

11 4.24 During the 2014 election, sponsors of political advertising confirmed a total of
12 \$310,165 in payments to Facebook for political advertising.

13 4.25 During the 2015 election, sponsors of political advertising confirmed a total of
14 \$147,689 in payments to Facebook for political advertising.

15 4.26 During the 2016 election, sponsors of political advertising confirmed a total of
16 \$1,153,688 in payments to Facebook for political advertising.

17 4.27 During the 2017 election, sponsors of political advertising confirmed a total of
18 \$857,893 in payments to Facebook for political advertising.

19 4.28 To date, during the 2018 election, sponsors of political advertising confirmed a
20 total of \$74,687 in payments to Facebook for political advertising.

21 V. CLAIMS

22 The State re-alleges and incorporates by reference all the factual allegations contained in
23 the preceding paragraphs, and based on those allegations, makes the following claims:

24 5.1 First Claim: The State reasserts the factual allegations made above and further
25 asserts that Defendant Facebook Inc., in violation of RCW 42.17A.345, failed to maintain
26 documents and books of account with the statutorily required information for political

1 advertising sponsored in Washington state elections from 2013 through 2018. The State further
2 alleges that Defendant Facebook Inc. failed to make such documents and books of account open
3 for public inspection during normal business hours for a period of three years following the
4 applicable election.

5 5.2 Second Claim: The State reasserts the factual allegations made above and further
6 asserts that the actions of Defendant Facebook, Inc. stated in the above claims were negligent
7 and/or intentional.

8 VI. REQUEST FOR RELIEF

9 WHEREFORE, the State requests the following relief as provided by law:

10 6.1 For such remedies as the court may deem appropriate under RCW 42.17A.750,
11 including but not limited to imposition of a civil penalty, all to be determined at trial;

12 6.2 For all costs of investigation and trial, including reasonable attorneys' fees, as
13 authorized by RCW 42.17A.765(5);

14 6.3 For temporary and permanent injunctive relief, as authorized by
15 RCW 42.17A.750(1)(h);

16 6.4 In the event the Court finds Facebook intentionally violated state campaign
17 finance disclosure laws, order any penalty assessed against Facebook to be trebled as authorized
18 by RCW 42.17A.765(5); and

19 6.5 For such other legal and equitable relief as this Court deems appropriate.

20 DATED this 30th day of November, 2018.

21 ROBERT W. FERGUSON
22 Attorney General


23 
24 LINDA A. DALTON, WSBA No. 15467
25 Senior Assistant Attorney General
26 S. TODD SIPE, WSBA No. 23203
Assistant Attorney General
Attorneys for Plaintiff State of Washington

EXHIBIT B

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**STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

Plaintiff,

v.

FACEBOOK, INC.,

Defendant.

NO. 18-2-14129-0 SEA

STIPULATION AND JUDGMENT

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: FACEBOOK, INC.
- C. PRINCIPAL JUDGMENT: \$200,000
- D. INTEREST: No prejudgment interest is owed. Principal judgment amount(s) due and owing shall not bear interest unless the principal judgment is unpaid by the due date specified herein
- E. COSTS AND FEES: \$38,500 in reasonable attorneys' fees, court costs, and costs of investigation
- F. ATTORNEYS FOR JUDGMENT CREDITOR: ROBERT W. FERGUSON, Attorney General
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
S. TODD SIPE, WSBA No. 23203
Assistant Attorney General
- G. ATTORNEY FOR JUDGMENT DEBTOR: WILLIAM STAFFORD, WSBA No. 39849
JAMES R. McCULLAGH, WSBA No. 27744
PERKINS COIE LLP

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STIPULATION


The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE), and Defendant, FACEBOOK INC., desiring to resolve all allegations and claims made in the State's First Amended Complaint brought under RCW 42.17A for conduct which the State alleges violated state campaign finance laws from 2013 through the date of the First Amended Complaint filing (November 30, 2018), and Defendant FACEBOOK INC. expressing their commitment to transparency in campaign finance and political advertising, and further not admitting to any violation of the law, hereby enter into the following stipulation:

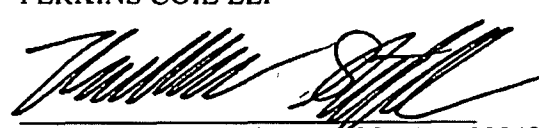
1. Defendant FACEBOOK INC. agrees to pay the State the amount of \$200,000 as a civil penalty in resolution of all allegations and claims made in the State's First Amended Complaint brought under RCW 42.17A for conduct the State alleges—but Defendant FACEBOOK INC. does not admit—violated state campaign finance laws from 2013 through the date of the First Amended Complaint filing (November 30, 2018). It agrees that such payment shall be made within 30 days of the entry of the Judgment in this action.
2. Defendant FACEBOOK INC. agrees to pay the State the total amount of \$38,500 as reasonable attorneys' fees, court costs, and costs of investigation in this action. It agrees that such payment shall be made within 30 days of the entry of the Judgment in this action.

DATED this 12 day of December, 2018.

ROBERT W. FERGUSON
Attorney General

PERKINS COIE LLP

 12/17/18
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
S. TODD SIPE, WSBA No. 23203
Assistant Attorney General
Attorneys for Plaintiff State of Washington


WILLIAM STAFFORD, WSBA No. 39849
JAMES R. McCULLAGH, WSBA No. 27744
Attorneys for Defendant FACEBOOK INC.

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JUDGMENT

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. Plaintiff, STATE OF WASHINGTON (STATE), appearing through its attorneys of record, ROBERT W. FERGUSON, Attorney General, LINDA A. DALTON, Senior Assistant Attorney General and S. TODD SIPE, Assistant Attorney General, and Defendant FACEBOOK INC., appearing through its attorney, WILLIAM STAFFORD and JAMES R. McCULLAGH of Perkins Coie LLP, apprised the Court of their agreement to the entry of this Judgment for the purpose of settling and compromising all allegations and claims contained in the State's First Amended Complaint brought under RCW 42.17A. The Court, having reviewed the records and files herein, and having found the settlement to be a just and proper resolution of this matter, and being otherwise fully advised in the premises, it is hereby **ORDERED** as follows:


1. Defendant FACEBOOK INC. is hereby ordered to pay the amount of \$200,000 as a civil penalty to the State of Washington within 30 days of the entry of this Judgment.
2. Defendant FACEBOOK INC. shall pay to the State of Washington the amount of \$38,500 as reasonable attorneys' fees, court costs, and costs of investigation within 30 days of the entry of this Judgment.

DONE IN OPEN COURT this ____ day of December, 2018.

JUDGE

PRESENTED BY:

ROBERT W. FERGUSON
Attorney General

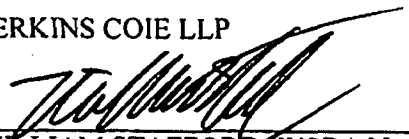


LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
S. TODD SIPE, WSBA No. 23203
Assistant Attorney General
Attorneys for Plaintiff State of Washington

AND:

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PERKINS COIE LLP



WILLIAM STAFFORD, WSBA No. 39849
JAMES R. McCULLAGH, WSBA No. 27744
Attorneys for Defendant FACEBOOK INC.

King County Superior Court
Judicial Electronic Signature Page

Case Number: 18-2-14129-0
Case Title: WASHINGTON STATE OF VS FACEBOOK INC
Document Title: Order
Signed By: Commissioner Henry Judson
Date: December 18, 2018

A rectangular box containing a handwritten signature in black ink. The signature appears to be 'H. Judson' written in a cursive style.

Judge/Commissioner: Commissioner Henry
Judson

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: 252A2613AD1DF6F184ADD5EFD5753C76D53A5CB8
Certificate effective date: 7/16/2014 12:09:30 PM
Certificate expiry date: 7/16/2019 12:09:30 PM
Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,
O=KCDJA, CN="Henry Judson:
WPypi5D74hGx6nH1YIhwmw=="

EXHIBIT C

Service Facebook
Target 514409202393399
Account Identifier loganforseattle
Account Type Page
Generated 2019-07-16 17:25:24 UTC
Date Range 2019-01-01 00:00:00 UTC to 2019-02-21 23:59:00 UTC
Creator Logan Bowers (536856944)
Registered Email logan@datacurrent.com
 loganbowers@facebook.com
Addresses

Ad Groups

Id	6116234717133
Start Date	2019-01-25 21:33:14 UTC
End Date	2019-02-04 21:33:13 UTC
Campaign Id	6116234714733
Total Reach	1144
Payment Account Name	Logan Bowers
Account	
Account Id	10150116974201945

Age/Gender 25-34 female 6%
Reach Percent 25-34 male 14%
 25-34 unknown 1%
 35-44 female 7%
 35-44 male 14%
 35-44 unknown 1%
 45-54 female 8%
 45-54 male 14%
 45-54 unknown 1%
 55-64 female 6%
 55-64 male 12%
 65+ female 6%
 65+ male 10%
 65+ unknown 0%

Region Reach Percent Washington 100%
Version

Id	6116234713933
Start Date	2019-01-25 21:33:14 UTC
End Date	2019-02-04 21:33:13 UTC
Impressions	120
Landing Uri	https://www.facebook.com/loganforseattle/
Ads Targeting	Location - Living In: United States: Latitude 47.62 Longitude -122.30 Seattle (+1.50 mi) Washington Age: 30 - 65+
Text	Hi,

I'm Logan Bowers, an engineer, small business owner, and lifetime resident of Seattle. I'm running to represent District 3 on the Seattle City Council because we need someone who will listen to the district and tackle the tough problems our growing city faces: unaffordability and displacement, transportation gridlock, soaring homelessness, and the looming threat of irreversible climate change.

Learn more at votelogan.org

Spend 1.94



Version
Photo Id: 541414516359534
Id 6116287003533
Start Date 2019-01-25 21:33:14 UTC
End Date 2019-02-04 21:33:13 UTC
Impressions 1302
Landing Uri <https://www.facebook.com/loganforseattle/>
Ads Targeting Location: United States: Latitude 47.62 Longitude -122.29 Seattle (+2 mi) Washington
Age: 30 - 65+
Text Hi,

I'm Logan Bowers, an engineer, small business owner, and lifetime resident of Seattle. I'm running to represent District 3 on the Seattle City Council because we need someone who will listen to the district and tackle the tough problems our growing city faces: unaffordability and displacement, transportation gridlock, soaring homelessness, and the looming threat of irreversible climate

change.

Learn more at votelogan.org

Spend 18.06



Photo Id: 541414516359534

Id 6116173523933
Start Date 2019-01-25 03:36:27 UTC
End Date 2019-02-09 03:38:30 UTC
Campaign Id 6116173521133
Total Reach 0
Payment Account **Account Name** Logan Bowers
Account Id 10150116974201945
Age/Gender

EXHIBIT D

Photo Id:

43776321:15a1c5c8af5b690f92bc7ded0051abc0

Id 6132163779209
Date Created 2019-02-16 02:32:24 UTC
Start Date 2019-02-16 02:32:28 UTC
End Date 2019-02-18 02:32:28 UTC
Campaign Id 6132163777809
Total Reach 4323
Payment Account **Account Name** Ari Hoffman
Account Id 10150124242212097

Age/Gender 18-24 female 3%
Reach Percent 18-24 male 5%
 18-24 unknown 0%
 25-34 female 10%
 25-34 male 23%
 25-34 unknown 1%
 35-44 female 6%
 35-44 male 10%
 35-44 unknown 0%
 45-54 female 7%
 45-54 male 11%
 45-54 unknown 0%
 55-64 female 5%
 55-64 male 6%
 55-64 unknown 0%
 65+ female 6%
 65+ male 6%
 65+ unknown 0%

Region Reach Washington 100%
Percent
Version

Id 6132163775609
Start Date 2019-02-16 02:32:28 UTC
End Date 2019-02-18 02:32:28 UTC
Impressions 5951
Landing Uri <https://www.facebook.com/AriHoffmanForSeattleCityCouncil/>
Ads Targeting Location - Living In: United States: Seattle (98104), Seattle (98108), Seattle (98118), Seattle (98134), Seattle (98144) Washington
 Age: 18 - 65+

Text DEMOCRACY VOUCHERS: No I am not taking them for my campaign. I do not believe that your hard earned dollars should be taxed to pay for political campaigns. They will be coming in the mail soon and if you are supporting me you have 2 options for your vouchers: A) Shred your vouchers so no one else can use them B) Mail them back and fill them out with my name so no one else can use them. Make sure you take a picture and tag the campaign with whatever you decide to do so we can share it. In the meantime, check out this 150 word summary we worked up for the elections site and share it with as many people as possible. If you would like to donate to the campaign you can do so at www.hoffmanforseattle.com

Spend 130.44



ARI HOFFMAN

FOR SEATTLE CITY COUNCIL 2019

DISTRICT 2

Ari Hoffman is running for City Council, District 2, because the increase in people experiencing homelessness impelled Ari to create a healthier, safer Seattle. Seattle is ready for common sense, compassionate and practical solutions. Ari serves on the board of Jewish cemeteries, where drug dealers and prostitutes broke into private property, desecrated gravestones, and assaulted the groundskeepers. Ari initiated media awareness campaigns, met with City Council members, community members, and the police department. In the process, budget issues, bureaucracy, and flaws in the system were exposed. Ari opposed the Head Tax and, together with grassroots organizations, gathered enough signatures to repeal the referendum. Ari lives and works in District 2, where he and his wife raise their children, and employs people from all over Seattle. As a volunteer, he has spent years running youth programming. Ari serves on boards for multiple non-profits and helped build schools and community infrastructure.

HOFFMANFORSEATTLE.COM