



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

November 27, 2024

Delivered electronically to Wellesley Daniels (Representative for No on 2117) at  
[wellesley@no2117.com](mailto:wellesley@no2117.com) and [info@no2117.com](mailto:info@no2117.com)

Subject: Complaint filed by Dan Brady, PDC Case 159256

Dear No on 2117:

Below is a copy of an electronic letter sent to Dan Brady concerning complaints filed with the Public Disclosure Commission (PDC).

As noted in the letter to Dan Brady, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with the political advertisement requirements noted in the enclosed letter sent to Mr. Brady. Staff expects you and your committee to review all future political advertisements to ensure that they include the required sponsor identification prior to being made available to the general public. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically signed by  
Tabitha Townsend*

---

Tabitha Townsend  
Compliance Officer

Endorsed by,

*Electronically signed by  
Peter Frey Lavallee*

---

Peter Frey Lavallee  
Executive Director



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

**Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcca.wa.gov](http://www.pdcca.wa.gov)**

November 27, 2024

Delivered electronically to Dan Brady at [dan@danbradylaw.com](mailto:dan@danbradylaw.com)

Subject: Complaint regarding No on 2117, PDC Case 159256

Dear Dan Brady:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on September 11, 2024, September 19, 2024, and October 16, 2024. The complaints alleged that No on 2117, a 2024 Political Action Committee registered with the PDC for Election Year 2024, may have violated RCW 42.17A.320 for failure to include complete sponsor ID on political advertisements.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Wellesley Daniels on behalf of the Respondent; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- The definition of "political advertising" found in RCW 42.17A.005(40) includes any advertising displays, newspaper ads, billboards, signs, brochures, articles, tabloids, flyers, letters, radio or television presentations, digital communication, or other means of mass communication, used for the purpose of appealing, directly or indirectly, for votes or for financial or other support or opposition in any election campaign.
- RCW 42.17A.320 requires that all video political advertising supporting or opposing a candidate or ballot proposition include the sponsor's name and address, with a black background and minimum font size and length of display time of at least four seconds.
- The complaints alleged that the 2024 campaign, No on 2117, posted multiple videos and failed to include proper sponsor identification as required by law.
- Staff's initial review of the videos included as evidence revealed that the sponsor ID included the required "paid for by" language followed by the name of the committee with full address but failed to have the required background/contrasting.
- In her responses, Ms. Daniels conveyed that all corrections were made to the videos at issue.

It appears that there were insufficient contrast areas behind the sponsor identification originally included on the 2024 No on 2117 Campaign videos. Staff found that, although the videos initially failed to include the required black/contrasting background, the identity of the sponsor as the Respondent's committee was clear to the reader.

Based on our findings staff has determined that, in this instance, failure to include a complete sponsor identification on written political advertisement does not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, No on 2117 will receive a formal written warning concerning failure to include a complete sponsor identification on political advertisements. The formal written warning will include staff's expectation that the committee and its members will review all future political advertisements to ensure that it includes the required sponsor identification prior to being made available to the general public. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically signed by  
Tabitha Townsend*

---

Tabitha Townsend  
Compliance Officer

Endorsed by,

*Electronically signed by  
Peter Frey Lavallee*

---

Peter Frey Lavallee  
Executive Director

cc: No on 2117