DATE RECEIVED
NOV 26 2025
WA STATE PDC

November 18, 2025

Washington State Public Disclosure Commission
711 Capitol Way S, #206
Olympia, WA 98501

Dear Commissioners:

We, both Democratic and Republican political consultants, are writing to urge the Public Disclosure Commission to work with the Washington State Legislature and other key stakeholders to modernize the state's campaign advertising regulations to allow political advertising on major digital platforms

As you know, these platforms (starting with Alphabet and Meta, and joined by Hulu in July 2025) have implemented policies restricting political advertising in Washington State due to our state's uniquely stringent ad disclosure requirements, particularly the requirement that digital platforms maintain detailed and publicly accessible political ad databases. While the goals of transparency and accountability are incredibly important, the practical effect of these regulations has been to deprive voters of access to critical election information and to prevent candidates—especially those with limited resources—from reaching voters where they actually consume media.

Consider the following:

- **Google and YouTube** (both owned by Alphabet) reach over **271 million users per month** in the U.S. YouTube alone is the **second most visited website in the world** after Google itself and ranks as the top streaming platform in the country.
- **Facebook**, with over **240 million U.S. users**, remains the **most-used social media platform** in the country, particularly among voters over 30.
- **Instagram** has over **160 million users** in the U.S., with strong penetration among younger and diverse audiences.
- **Hulu**, a leading streaming platform, has more than **50 million U.S. subscribers**, with its ad-supported tiers reaching households that increasingly do not consume traditional cable or broadcast television.
- According to the Nielsen rating service, digital platforms now **outpace broadcast and cable TV combined** in average daily screen time among adults in the United States.

These platforms are not fringe or optional. They are the dominant means by which Washingtonians learn about current events, civic matters, and elections. Preventing political campaigns from accessing these channels significantly impedes both voter education and democratic participation. And, with Hulu joining Alphabet and Meta, we are seeing a future where one by one all of these services will pull the plug on Washington state electoral campaigns.

We encourage the PDC to initiate a dialogue with legislative leaders and platform representatives to explore amendments to Washington's disclosure laws that uphold transparency while enabling

access to these widely used platforms. States like California and New York have implemented disclosure laws that balance transparency with feasibility, and Washington can do the same.

In a rapidly evolving media landscape, our regulatory framework must evolve to meet people where they are. We must ensure that our commitment to transparency does not come at the expense of informed participation.

Thank you for your attention and for your continued dedication to strengthening democracy in Washington State.

Sincerely,

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CEO, CN4 Partners

Chad Minnick
Founder, Minnick Group

Co-Chairs, American Association of Political Consultants Northwest Chapter

Cc: Sen. Javier Valdez
Rep. Sharlett Mena