19 July 2026

Dear Public Disclosure Commission;

Joe A. Kunzler here. Regular commentator plus complainant to the point as I like to say… "I Win, PDC Enforcement Case Search Me." With that, we got a serious problem with Washington Administrative Code (WAC) 390-18-010(5) and the application thereof.

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Current Language and Why We're Here

Below is the current language of WAC 390-18-010(5) so that we are all speaking from the same language:

> (5) Required sponsor identification must be clearly identified, spoken or displayed on advertising on websites, social media and other digital communication. Political committee websites and other online forums created by a political committee must include sponsor identification.

The general WAC was invoked in a March 19, 2025 warning letter to political action committee Let's Go Washington (LGW):

> This letter serves as a formal warning concerning your failure to include proper sponsor identification for online advertising posted on the platform X in accordance with RCW 42.17A.320(1) and WAC 390-18-030(3), because the sponsor identification was not viewable with one click. For future online political advertising, staff expects you to make sponsor identification viewable with one click, for example, by including the sponsor identification on the bio page of X when posting future political advertising on that platform. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

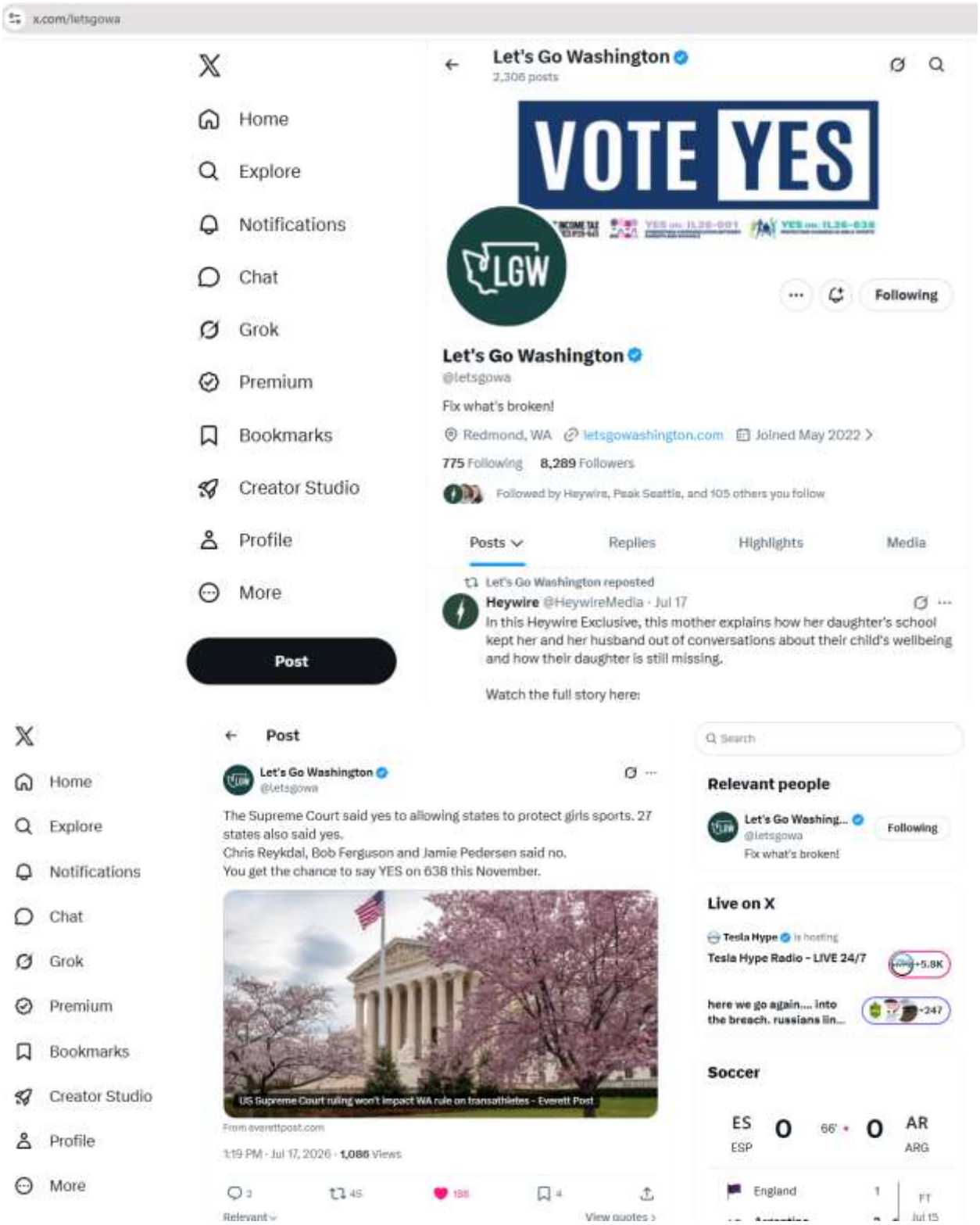
A small problem is the WAC cited is now part 3 regarding print advertising but the point remains. Right now, we are not seeing the spirit of the WAC applied by many campaigns in 2026 – and I have filed multiple complaints to the Public Disclosure Commission about this on the initiative campaign side. Ergo, I submit rulemaking action is needed for *clarity*.

Let's fix this now in the summer so we have a *clean* fall campaign. At the end of this letter is recommended language. But first, I feel I need to offer a sampling of examples of current noncompliance as part of this petition as well as an example of what I have in mind.

Examples of Noncompliance

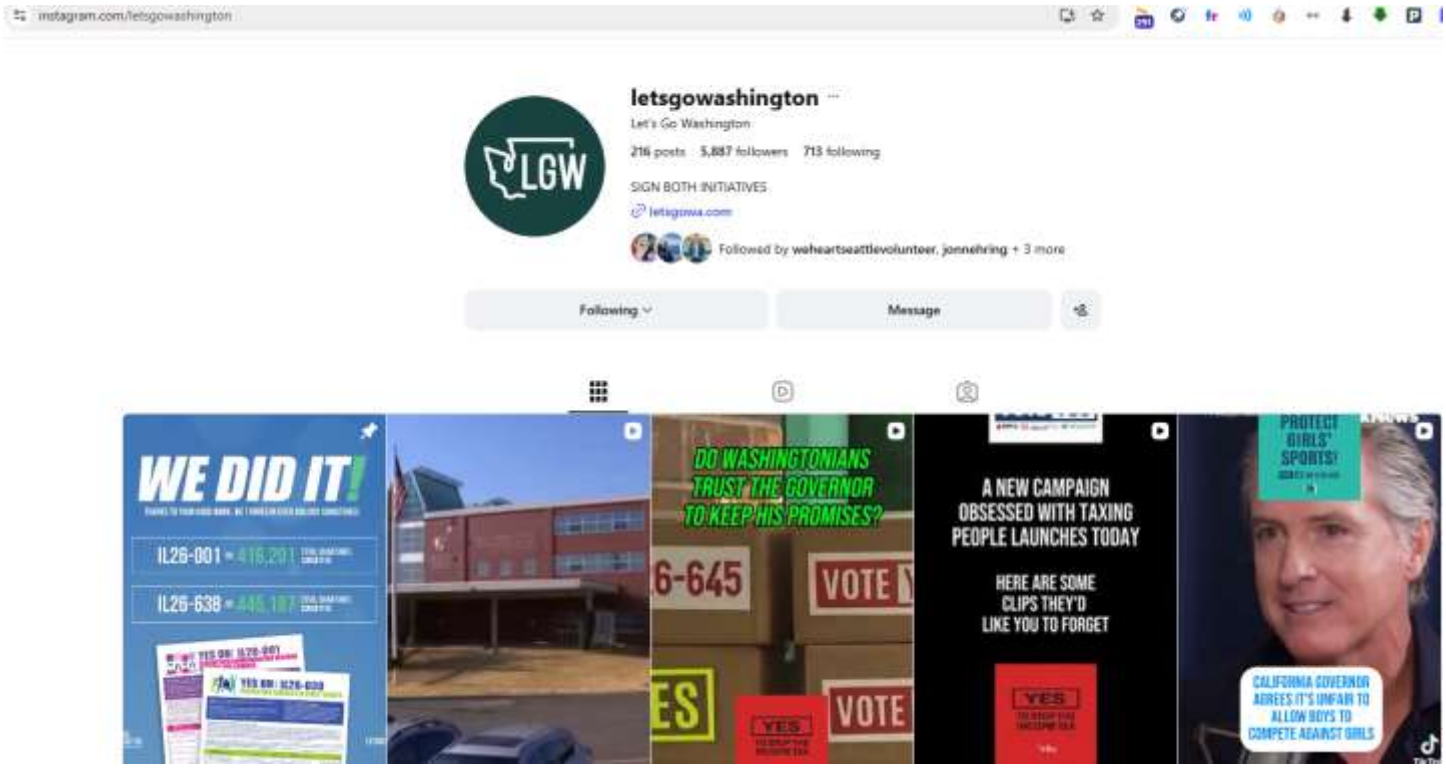
Let's Go Washington

Logically, this should start with Let's Go Washington's current *continued* noncompliance on X at x.com/letsgowa:



I have filed a currently unnumbered complaint against Let's Go Washington for this year's noncompliance. But without this information, nobody knows this is one of Steve Gordon and Brian Heywood's efforts. *This is not OK*.

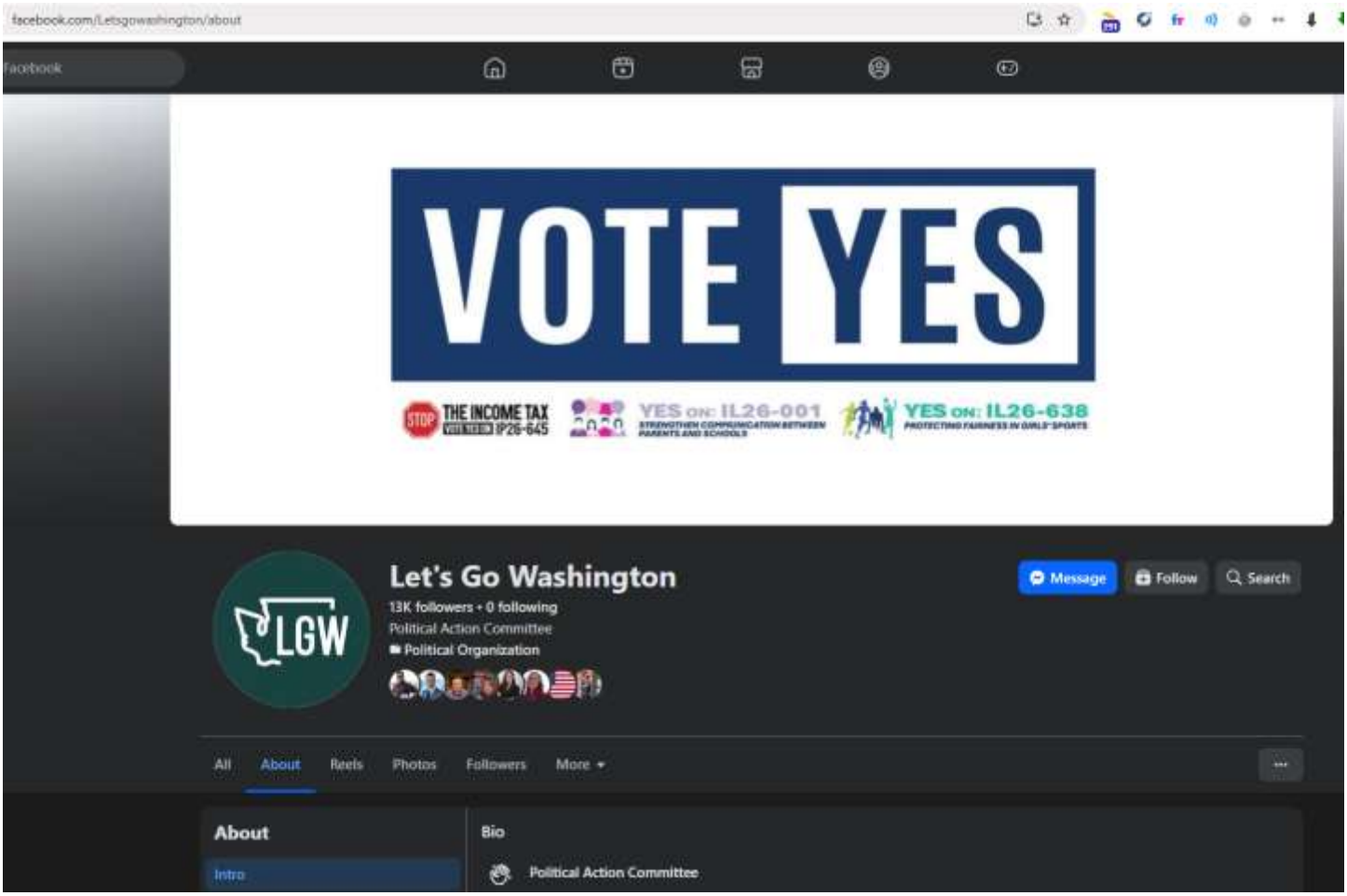
Same noncompliance with the warning letter on instagram.com/letsgowashington:





Sadly not surprising. *This* and more PDC complaints are what happens when warning letters get discarded and there's no clear standard enforced.

Somehow, I'm not surprised this noncompliance has carried over to Facebook:



At least Let's Go Washington gets it right on Substack because on each post at the bottom, such as letsgowashington.substack.com/p/no-on-645-launched-this-week is this sweet disclosure:

> *© 2026 Let's Go Washington. All Rights Reserved.*
> *Paid for by Let's Go Washington - Sponsored by Brian Heywood*
> *16625 Redmond Way, Suite M-PMB18 | Redmond, WA 98052.*
> *TOP 5 Donors: Brian Heywood, Steve Gordon, Washington Rising Inc., Kelley DevCom LLC., Lawrence Hughes. PAC TOP 3: Robert Ramsey, Peter Plath, Janie Plath*

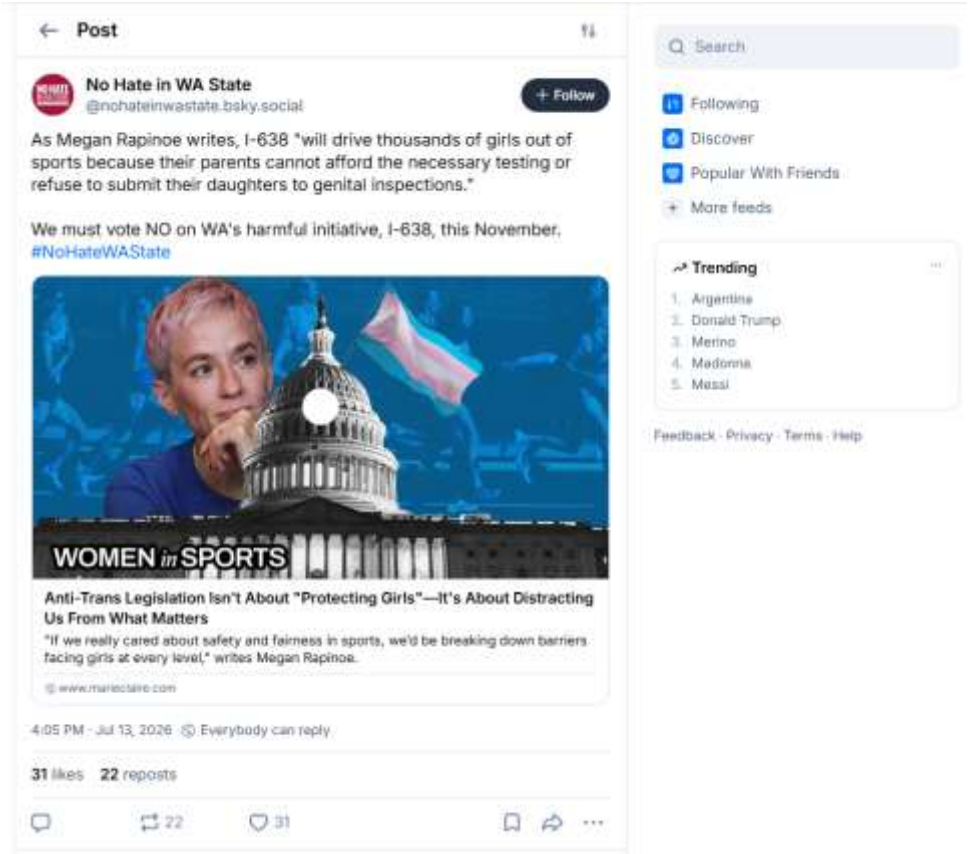
As you just saw, Let's Go Washington can find a way to comply when they want to. I'm sure some social media and calls into Ari Hoffman's afternoon KVI 570 program led to these results. Now we just need to see a similar result *replicated* on other social media platforms.

But Let's Go Washington is not the only reason why we need some rulemaking action...

No Hate in WA State

Let's move forward to "No Hate in WA State" which also is arguably in noncompliance also. First, their Blu Sky platform:



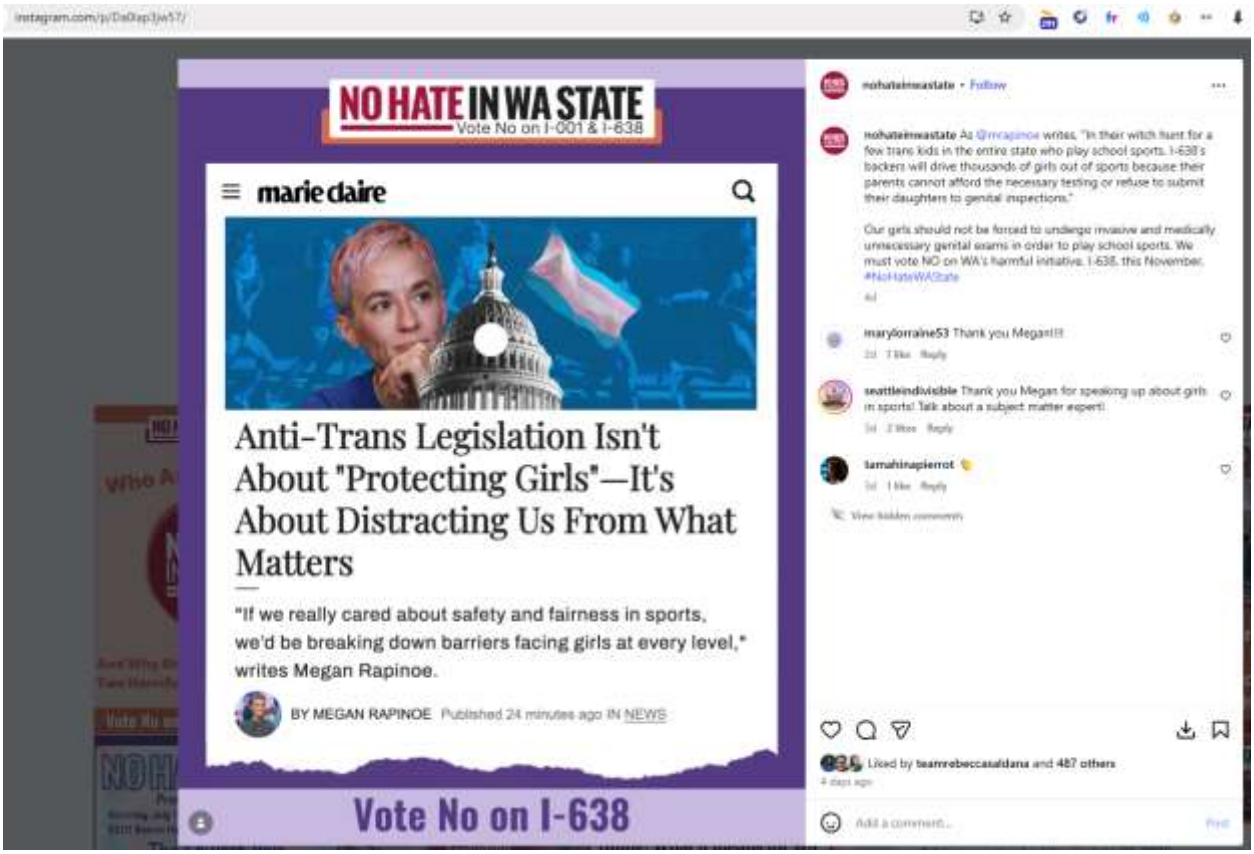


First, I submit that “No Hate in WA State” is not exactly in compliance. Again, from the warning letter given to their foe “Let’s Go Washington”

> For future online political advertising, staff expects you to make sponsor identification viewable with one click, for example, by including the sponsor identification on the bio page of X when posting future political advertising on that platform.

Clearly, sponsor ID’s not viewable with one click, but several on Blu Sky. However, this is not just a Blu Sky issue but transfers over to “No Hate in WA State” Instagram at instagram.com/nohateinwastate:





As you can see, the problem is not platform-specific. Or initiative campaign specific.

Example of Compliance

First, this is only an example of compliance. Not serving as endorsement of my suggested rulemaking or any comments in this letter. Sadly, I could only find one example…

Vanessa Kritzer for State Representative

OK, now the GOAT of Redmond Presidents and Alex Tsimerman's worst nightmare gets to take the field. Let's go check out my McMorrow/Mendoza/*Mensch* – take your pick – at instagram.com/electvanessa/



There she is – one-click compliance on Instagram. Ditto Facebook:



Language Request

First, I want to as per the coaching I've received, this is 100% my idea and not that of any politician of any political party. Any.

Second, this was cooked up on a Sunday afternoon in part because after going thru many a House Republican campaign finance page to attempt to be nonpartisan about this – no example of full compliance. None. I could literally file complaint after complaint, or I could suggest rulemaking. Considering the complaints PDC Commissioners and Staff have made about other star PDC complainants filing many complaints at once; I am hoping this approach will be more effective and more welcome.

Third, I have attempted to offer up a rule that allows for flexibility as per each social media platform. But the sponsor ID *does* matter.

OK, let's rip – all new language is in green.

(5) Required sponsor identification must be clearly identified, spoken or displayed on advertising on websites, social media and other digital communication. Political committee websites and other online forums created by a political committee must include sponsor identification.

(a) A requirement is that the sponsor identification be either embedded into the header graphic, or at the bottom of each social media post, or in the text of the header of each social media platform/forum and any other online forum used by a campaign.

(b) All candidate campaigns must clearly state in the header graphic or in the text of the header of each social media platform/forum and any other online forum used by a campaign or at the bottom of each social media post that the social media post is paid for by the sponsor (Example: (1) Paid for by the XYZ committee, mailing address, city, state, zip code; (2) Vote for John Doe, paid for by John Doe, mailing address, city, state, zip code).

Concluding Thoughts

Again, all thoughts herein mine. With that, I am open to alternative language if that is the PDC's wish. I have seen enough noncompliance that I could literally create a Word template to file *dozens* of complaints against many campaigns. Therefore, I am asking this alternative approach please be perceived as helpful, timely, and deserving of approval.

Very respectfully submitted 19 July 2026;



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