



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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VIA ELECTRONIC MAIL ONLY

August 24, 2019

Chair Brendan Donckers
Seattle Ethics and Elections Commission
PO Box 94729
Seattle, Washington 98124-4729

RE: Public Disclosure Commission support for the goals of the proposed ordinance addressing the influence of independent expenditures and strengthen reporting requirements

Dear Chair Donckers,

At our Public Disclosure Commission meeting this week, we heard testimony and discussed the working draft ordinance addressing Super PAC funding, foreign influence, and commercial advertisements that the SEEC had reviewed and discussed at its meeting earlier this month. At the conclusion of the discussion, the Commissioners were unanimous in expressing strong support for the goals and objectives of the proposed ordinance, and asked that I communicate that support to the SEEC.

It was transparency and campaign finance reform advocates who, in 1972, with support from more than 72% of voters, created the PDC so that the public would have information about the financial affairs of candidates and elected officials, the activities of lobbyists, and the financing of election campaigns. The public's support, actually insistence, for transparency in our electoral system and government since then has been unwavering.

We can and should all take great pride in Washington's national reputation as a state that protects the right to vote, ensures the integrity of its elections, and works hard to address the distorting impact of money in politics. Seattle's Democracy Vouchers, and the State's strong campaign expenditure and reporting requirements are but two examples of that commitment.

An ordinance limiting large contributions to independent expenditure committees in order to prevent corruption or the appearance of corruption, protecting against foreign interference through limiting campaign spending by corporations with foreign ownership of a scale that influences corporate decision-making, and strengthening commercial advertisers' duty to report, would be another important tool to address the influence of money in campaigns, and to guard against the potentially deleterious effects of excessive corporate spending in municipal elections.

We understand additional analysis of legal issues and drafting work is still to be done, along with further consideration by the SEEC, and then by the City Council. In the meanwhile, we wanted to communicate our support for the goals of the proposed ordinance and offer the PDC's assistance as you move forward.

We have asked PDC staff to follow up with SEEC staff and offer to provide any analysis or input that might be helpful. They can assess whether there is a need to amend any language to ensure alignment with RCW 42.17A, the State's campaign finance law, or PDC rules. We discussed, for example, the language regarding reporting requirements for commercial advertisers, who are also regulated by State law and PDC rules.

In conclusion, we want to commend you for your continued commitment to reforms that enhance transparency, level the playing field, and help ensure a fair elections process. The PDC is fortunate to have SEEC as a partner in our mutual goal of increasing the public's trust and faith in our electoral system and governing institutions.

Sincerely,



Judge Anne Levinson (Ret.)
Chair, Washington State Public Disclosure Commission

cc: PDC Commissioners
Wayne Barnett, Executive Director, Seattle Ethics and Elections Commission
Peter Lavallee, Executive Director, Public Disclosure Commission