

1 relief from Google under RCW 42.17A.750 and RCW 42.17A.780, including civil penalties,
2 costs and fees, and injunctive relief.

3 II. PARTIES

4 2.1 Plaintiff is the State of Washington acting through the Washington State Attorney
5 General. Under RCW 42.17A.765, the Attorney General may bring civil actions in the name of
6 the State for violations of state campaign finance disclosure laws contained in RCW 42.17A that
7 have been referred by the Public Disclosure Commission (PDC or Commission).

8 2.2 Google is a technology company headquartered in Mountain View, California that
9 specializes in internet-related services and products. As the term is defined in
10 RCW 42.17A.005(10), Google is a commercial advertiser operating in the State of Washington.
11 It accepted compensation for the placement of political advertising through its advertising
12 networks.

13 III. JURISDICTION AND VENUE

14 3.1 This Court has subject matter jurisdiction over the present case, in accordance
15 with RCW 42.17A. The Attorney General has authority to bring this action pursuant to
16 RCW 42.17A.765.

17 3.2 This Court has jurisdiction over Google, a commercial advertiser conducting
18 business in the State of Washington. Google offered services and received payments from
19 persons placing political advertisements in Washington. The acts and omissions complained of
20 in this Complaint took place, in whole or in part, in King County.

21 3.3 Venue is proper in this Court pursuant to RCW 4.12.

22 IV. FACTUAL ALLEGATIONS

23 A. Washington's Campaign Finance Statute and Its Requirements for Commercial 24 Advertisers Such as Google

25 4.1 RCW 42.17A declares as a matter of public policy "[t]hat political campaign and
26 lobbying contributions and expenditures be fully disclosed to the public and that secrecy is to be

1 avoided.” RCW 42.17A.001(1). The statute further provides that “the public’s right to know of
2 the financing of political campaigns . . . far outweighs any right that these matters remain secret
3 and private.” RCW 42.17A.001(10). To these ends, the State’s campaign finance and disclosure
4 law “shall be liberally construed to promote complete disclosure of all information respecting
5 the financing of political campaigns” RCW 42.17A.001.

6 4.2 The State has a compelling interest in ensuring transparency and integrity in
7 Washington elections so that voters may learn the real source and nature of paid advertisements
8 targeting the electorate. RCW 42.17A.345 and WAC 390-18-050 help achieve this compelling
9 interest by requiring online and digital platforms to maintain records identifying the true
10 sponsors of advertisements seeking to influence state and local elections, and to make that
11 information and other relevant records for such advertisements available to the public on a timely
12 basis.

13 4.3 RCW 42.17A.345(1) requires commercial advertisers who have accepted or
14 provided political advertising or electioneering communications during an election campaign to
15 maintain documents and books of account that shall be open to the public for their inspection
16 during normal business hours during the campaign and for at least five years after the date of the
17 applicable election. These documents and books of account must include “(a) [t]he names and
18 addresses of persons from whom [the commercial advertiser] accepted political advertising or
19 electioneering communications; (b) [t]he exact nature and extent of the services rendered; and
20 (c) [t]he total cost and the manner of payment for the services.” RCW 42.17A.345(1).

21 4.4 In 2018, the Washington Legislature amended the campaign finance statute to
22 clarify that the definition of commercial advertiser encompasses persons selling paid internet or
23 digital communications. The Commission also amended its regulations to clarify the obligations
24 of digital platforms, such as Google, that accept or provide political advertisements or
25 electioneering communications through its advertising networks.

1 4.5 When amending the campaign finance statute in 2018, the Legislature declared
2 that “state campaign finance laws are intended to provide maximum transparency to the public
3 and voters so they may know who is funding political campaigns”¹ A prime sponsor stated
4 that the 2018 amendments sought to “bring[] dark money into the light” and that increased
5 transparency is important “because it creates informed voters, it reduces the opportunity for
6 corruption, provides accountability for the people and organizations that are attempting to
7 influence our elections. In short transparency makes for a healthier democracy.”²

8 4.6 RCW 42.17A.005(10) defines a “commercial advertiser” as:

9 any person that sells the service of communicating messages or producing
10 material for broadcast or distribution to the general public or segments of the
11 general public whether through brochures, fliers, newspapers, magazines,
12 television, radio, billboards, direct mail advertising, printing, paid internet or
13 digital communications, or any other means of mass communications used for the
14 purpose of appealing, directly or indirectly, for votes or for financial or other
15 support in any election campaign.

16 4.7 RCW 42.17A.005(40) defines “political advertising” to include “any advertising
17 displays, newspaper ads, billboards, signs, brochures, articles, tabloids, flyers, letters, radio or
18 television presentations, digital communication, or other means of mass communication, used
19 for the purpose of appealing, directly or indirectly, for votes or for financial or other support or
20 opposition in any election campaign.”

21 4.8 RCW 42.17A.005(21)(a) defines “electioneering communication” to include:

22 any . . . digital communication . . . that:

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

26 (ii) Is . . . transmitted electronically or by other means . . . within sixty
days before any election for that office in the jurisdiction in which the candidate
is seeking election; and

¹E.S.H.B. 2938, 65th Leg., Reg. Sess., Laws of 2018, ch. 304,
<http://lawfilesexternal.wa.gov/biennium/2017-18/Pdf/Bills/Session%20Laws/House/2938-S.SL.pdf?q=20210129093352>.

²Sen. Andy Billig, Wash. Leg. Dist. 3, Public Hearing before the Senate State Government, Tribal Relations & Elections Committee (Jan. 10, 2018, 8:00 AM), <https://www.tvw.org/watch/?eventID=2018011082>.

1 (iii) Either alone, or in combination with one or more communications
2 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.

3 4.9 RCW 42.17A.005(47)(a) defines “sponsor” for the “purposes of an electioneering
4 communications, independent expenditures, or political advertising [as] the person paying for
5 the electioneering communication, independent expenditure, or political advertising. If a person
6 acts as an agent for another or is reimbursed by another for the payment, the original source of
7 the payment is the sponsor.”

8 4.10 RCW 42.17A.005(39) defines “person” as “an individual, partnership, joint
9 venture, public or private corporation, association, federal, state, or local governmental entity or
10 agency however constituted, candidate, committee, political committee, political party,
11 executive committee thereof, or any other organization or group of persons, however organized.”

12 4.11 RCW 42.17A.005(7)(b) defines a commercial advertiser’s “books of account” as
13 “details of political advertising or electioneering communications provided by the advertiser,
14 including the names and addresses of persons from whom it accepted political advertising or
15 electioneering communications, the exact nature and extent of the services rendered and the total
16 cost and the manner of payment for the services.”

17 **B. The Commission’s Regulations for Commercial Advertisers**

18 4.12 The Commission has promulgated regulations for RCW 42.17A.345, specifying,
19 in more detail, the information that commercial advertisers must maintain and disclose as part
20 of the “exact nature and extent of the services rendered” and how that information must be made
21 available to the public. RCW 42.17A.005(7)(b); RCW 42.17A.345(1)(b); *see also*
22 RCW 42.17A.110(1) (authorizing the Commission to adopt “rules to carry out the policies and
23 purposes of this chapter”).

24 4.13 In 2018, the Commission amended its regulations to clarify that “commercial
25 advertisers” include “internet” entities that “sell[] the service of communicating messages . . .
26 for broadcast or distribution to the general public or segments of the general public . . . through

1 . . . paid internet or digital communications . . . used for the purpose of appealing, directly or
2 indirectly for votes or for financial or other support in any election campaign.” Wash. St. Reg.
3 18-24-074, § 390-18-050, filed Nov. 30, 2018, eff. Dec. 31, 2018 (amending WAC 390-18-050).

4 4.14 In its regulations, the Commission requires commercial advertisers’ books of
5 account and related materials to be available for public inspection by any person, and provided:

- 6 (a) In person during normal business hours; or
- 7 (b) Electronically, in machine readable format and structured in a way that
enables the data to be fully discoverable and useable by the end user:
 - 8 (i) By digital transmission, such as email, promptly upon request; or
 - 9 (ii) By online publication in one of the following formats:
 - 10 (A) On the advertiser’s primary website; or
 - 11 (B) On a website controlled by the advertiser, created for purposes of publishing
the information required by this section, if a link is prominently displayed on the
advertiser’s primary website directing users to the website on which the
information is provided.

12 WAC 390-18-050(3)(a)-(b).

13 4.15 The Commission also requires that information regarding political advertising or
14 electioneering communications be made available within 24 hours of the advertisement’s initial
15 distribution or broadcast, and within 24 hours of any update or change to such information. The
16 information and books of account that must be maintained for open inspection pursuant to
17 RCW 42.17A.345 are: (a) the “name of the candidate or ballot measure supported,” “opposed,”
18 or “otherwise identified,” and whether the advertisement “supports or opposes the candidate or
19 ballot measure;” (b) the “name and address” of the “sponsor[s] . . . actually paying for the
20 advertising or electioneering communication,” including an entity’s “federal employee
21 identification number, or other verifiable identification, if any, . . . so that the public can know
22 who paid for the advertising or communication, without having to locate and identify any
23 affiliated entities;” (c) the advertisement’s “total cost” or “initial cost estimate if the total cost is
24 not available upon initial distribution or broadcast,” as well as “how much of that amount has
25 been paid, as updated, who made the payment, when it was paid, and what method of payment
26

1 was used;” and (d) the “[d]ate(s) the commercial advertiser rendered service.”
2 WAC 390-18-050(5)(a)-(d).

3 4.16 Finally, the Commission mandates that the “exact nature and extent of the
4 services rendered” for advertisements on digital communication platforms must include a
5 “description of the demographic information (e.g., age, gender, race, location, etc.) of the
6 audiences targeted and reached,” but only “to the extent such information is collected by the
7 commercial advertiser as part of its regular course of business[.]” WAC 390-18-050(6)(g). The
8 records must also include “the total number of impressions generated by the advertisement [or]
9 communication.” *Id.*

10 4.17 Google sells advertising through its advertising networks, including political
11 advertising. Accordingly, Google is a commercial advertiser as the term is used in RCW 42.17A.
12 As a commercial advertiser, Google is required to comply with RCW 42.17A.345 and
13 WAC 390-18-050.

14 **C. State’s Prior Lawsuit Against Google for Campaign Finance Violations**

15 4.18 On June 4, 2018, the State filed an action in King County Superior Court alleging
16 that Google had continuously violated RCW 42.17A.345 from 2013 to the date of the Complaint
17 by failing to maintain the required books of account and statutorily required information for
18 political advertisements sponsored in Washington elections it had accepted and/or provided by
19 failing to timely maintain and make such books of accounts or documents available for public
20 inspection when requested. A true and correct copy of the State’s Complaint for Civil Penalties
21 and for Injunctive Relief for Violations of RCW 42.17A, that was filed on June 4, 2018, is
22 attached hereto as **Exhibit A**.

23 4.19 Three days later, on June 7, 2018, Google announced that the company’s
24 advertising networks would no longer accept political advertisements targeting state or local
25 elections in Washington State. Google’s announced policy was not required by any Washington
26 law and it was not requested by the State. Washington’s commercial advertiser law promotes

1 transparency not by seeking to proscribe, restrict, or in any way regulate the content of political
2 advertising, but merely by promoting disclosure. In any event, despite Google's announced
3 policy, it continued to accept or provide political advertisements and electioneering
4 communications for state and local elections in Washington State.

5 4.20 On December 18, 2018, the King County Superior Court entered a stipulated
6 judgment resolving Google's alleged violations of RCW 42.17A.345 from 2013 through the date
7 of the State's June 4, 2018, Complaint filing. Under the terms of the stipulated judgment, Google
8 agreed to pay the State \$200,000.00 as a civil penalty and an additional \$17,000.00 for the State's
9 reasonable attorneys' fees, court costs, and costs of investigation. A true and correct copy of the
10 State's Stipulation and Judgment against Google entered by the King County Superior Court on
11 December 18, 2018, is attached hereto as **Exhibit B**.

12 **D. Google Continues to Violate Washington's Commercial Advertiser Law**

13 4.21 Notwithstanding Google's June 7, 2018, announcement and the
14 December 18, 2018, stipulated judgment, Google continued to accept payments for and provide
15 political advertisements or electioneering communications in Washington State and local
16 campaigns through its advertising networks. As such, Google remained a commercial advertiser
17 as the term is used in RCW 42.17A and has been and is still required to comply with
18 RCW 42.17A.345 and WAC 390-18-050.

19 4.22 Since June 4, 2018, fifty-seven candidates and political committees required to
20 file campaign disclosure reports with the PDC have reported 188 payments totaling
21 approximately \$461,334 related to political advertising and electioneering communications on
22 Google's advertising networks. These payments included \$420,005 paid through political
23 consultants and other agents or intermediaries, and \$41,329 paid directly to Google.

24 4.23 During 2020, the most recent full election year, Washington State candidates and
25 political committees reported making approximately \$167,323 in payments related to political
26 advertising on Google's advertising networks.

1 4.24 As an example of Washington political advertisements Google accepted or
2 provided after June 4, 2018, Google accepted or provided political advertisements purchased by
3 Strategies 300, Inc. on behalf of the group Moms for Seattle that ran in July 2019, intended to
4 influence city council elections in Seattle. Google also accepted or provided political
5 advertisements purchased by Strategies 300, Inc. on behalf of the Seattle fire fighters that ran in
6 October 2019, intended to influence elections in Seattle. These Google advertisement purchases
7 were disclosed in expenditure reports filed with the PDC by the sponsors for those
8 advertisements.

9 4.25 Due to Google’s widespread failure to comply with state campaign finance
10 disclosure laws, it is unknown how many additional Washington political advertisements or
11 electioneering communications Google accepted or provided on its advertising networks that
12 were not reported to the Commission—whether sponsored by noncompliant campaigns, dark
13 money sources, or other political actors.

14 4.26 Google failed to timely maintain in a manner open for public inspection all of the
15 information required under RCW 42.17A.345 and WAC 390-18-050 for the political
16 advertisements and electioneering communications that it continued to accept or provide after
17 June 4, 2018, for Washington State and local election campaigns.

18 4.27 Further, on at least two instances since June 4, 2018, Google failed to timely
19 respond to specific requests from members of the public, in the manner required under
20 RCW 42.17A.345 and WAC 390-18-050, for information about political advertisements and
21 electioneering communications it had continued to accept or provide for Washington State or
22 local election campaigns.

23 **E. Google Failed to Timely Respond to Eli Sanders’s Request in March 2019**

24 4.28 On March 4, 2019, Washington State resident Eli Sanders sent an email to Google
25 seeking information from Google on the political ads that Google sold to Spokane’s “Yes for
26 Public Safety” campaign or its agents since January 1, 2019. In particular, Sanders requested

1 that Google provide “all of the information that Google is legally required to disclose about such
2 advertising under Washington State law (RCW 42.17A.345) and the Washington State
3 Administrative Code (WAC 390-18-050).”

4 4.29 Two days later, on March 6, 2019, Google acknowledged receipt of Sanders’
5 request and stated that the company was “looking into this.”

6 4.30 On March 11, 2019, Sanders emailed Google again to ask when he could expect
7 to hear more about his request.

8 4.31 On March 13, 2019, more than a week after his request had been made, Google
9 still had not provided Sanders with any of the information he had requested. That same date,
10 Sanders submitted a complaint to the PDC, alleging that Google had committed violations of
11 RCW 42.17A.345 and WAC 390-18-050.

12 4.32 Google violated RCW 42.17A.345 and WAC 390-18-050 by failing to timely
13 provide Sanders with the required information for the political advertisements covered by his
14 request.

15 4.33 In addition, Google violated RCW 42.17A.345 and WAC 390-18-050 with
16 regard to each one of the political advertisements covered by Sanders’ request by failing to
17 maintain the required information for those advertisements open for public inspection within
18 24 hours after Google publicly displayed them, or within 24 hours of any update or change to
19 such information.

20 **F. Google Failed to Timely Respond to Tallman Trask’s Request in October 2019**

21 4.34 On October 27, 2019, Washington State resident Tallman Trask contacted
22 Google, through its online support and help platform, requesting formation required under
23 RCW 42.17A.345 and WAC 390-18-050 for advertisements purchased by Western Consultants,
24 LLC “and political ads related to the 2019 elections in Washington state.”
25
26

1 4.35 After receiving no response from Google for three days, Trask submitted a
2 complaint to the PDC on October 30, 2019, alleging that Google had committed violations of
3 RCW 42.17A.345 and WAC 390-18-050.

4 4.36 On or around November 8, 2019, Google untimely provided Trask with some
5 required information for Washington state political advertisements accepted or provided by
6 Google that Trask had identified from PDC expenditure reports as having been purchased by
7 Western Consultants, LLC. Google still failed to provide Trask with the required information
8 for the other political advertisements Google accepted or provided related to the 2019 elections
9 in Washington even though Google had in fact provided or accepted such advertisements.

10 4.37 Google violated RCW 42.17A.345 and WAC 390-18-050 by failing to timely
11 provide Trask with the required information for all of the political advertisements covered by his
12 request.

13 4.38 In addition, Google violated RCW 42.17A.345 and WAC 390-18-050 with
14 regard to each one of the political advertisements covered by Trask's request by failing to
15 maintain the required information for those advertisements open for public inspection within
16 24 hours after Google publicly displayed them, or within 24 hours of any update or change to
17 such information.

18 **G. PDC's Investigation of Complaints Brought Against Google**

19 4.39 The PDC investigated both Sanders' and Trask's complaints against Google. On
20 May 1, 2019; November 18, 2019; March 25, 2020; and May 6, 2020, PDC staff sent requests
21 to Google, seeking the information specified in RCW 42.17A.345 and WAC 390-18-050 for
22 advertising expenditures sponsored and reported by the campaigns specified in the Sanders and
23 Trask complaints, as well as for all political advertising and electioneering communications
24 sponsored through Google's advertising network in the 2019 election.

25 4.40 On June 4, 2019; November 8, 2019; December 4, 2019; April 17, 2020; and
26 June 2, 2020, Google responded to PDC staff's requests. Google indicated that the company did

1 not possess and could not provide all of the information specified in RCW 42.17.345 and
2 WAC 390-18-050 as requested by PDC staff, including for the advertising sponsored and
3 reported by the campaigns specified in the Sanders and Trask complaints.

4 4.41 By way of example, in a letter to the PDC dated June 4, 2019, Google confirmed
5 its receipt of \$4,665 in political advertising expenditures by Spokane Firefighters' Union
6 Local 29, an amount approximately equal to expenditures in January and February 2019 that
7 were reported by the union's self-identified "Yes for Public Safety" campaign.

8 4.42 Google provided copies of eight political advertisements that Spokane
9 Firefighters' Union Local 29 ran on Google's advertising network, resulting in 6,200,000 viewer
10 impressions. Each advertisement included the language "VOTE YES PROP 1" and the
11 disclaimer "Paid for by Yes for Public Safety." True and correct copies of advertisements
12 disclosed by Google are attached hereto as **Exhibit C** to this complaint.

13 4.43 However, Google did not provide the federal employee identification number for
14 the sponsor of the "Yes for Public Safety" advertisements, or other verifiable sponsor
15 information, the dates of payment for the advertising, or the name of the person making the
16 payment.

17 4.44 In its June 4, 2019, letter to the PDC, Google stated that the company does not
18 collect all of the information requested by the PDC's May 1, 2019, letter in the course of the
19 company's normal business activities. Google stated that it recognized in June 2018 (when
20 Google announced that it would no longer accept political advertisements targeting state or local
21 elections in Washington State) that its systems could not obtain the categories of political
22 advertising information that Washington law required, nor on the schedule that PDC regulations
23 required.

24 4.45 In a letter to Trask on April 15, 2020, Google provided information on certain
25 political advertisements placed through Google's advertising network between January 1, 2019,
26 and October 27, 2019, the period at issue in Trask's October 27, 2019, request. The information

1 included copies of thirty-seven advertisements sponsored by five campaigns: Citizens for
2 Support of Yelm Schools (a school funding measure), Chariss Warner for Kennewick City
3 Council, People to Elect Ben Stuckart Spokane Mayor, Michael Cathcart for Spokane City
4 Council, and Christie Malchow for Sammamish City Council. True and correct copies of
5 advertisements disclosed in Google's April 15, 2020, letter are attached as **Exhibit D** to this
6 complaint. Google confirmed that these thirty-seven advertisements were placed on the
7 company's advertising network.

8 4.46 In Google's April 15, 2020, letter to Trask, sent more than five months after his
9 original request, the company provided some, but not all of the information required under
10 WAC 390-18-050 for the advertisements identified in the letter. For example, Google did not
11 identify verified sponsor identification information or the candidate or measure supported or
12 opposed by the advertisements. In addition, Google did not identify the person making payments
13 for all advertisements identified in its letter.

14 4.47 Further, Google's April 15, 2020, letter to Trask identified advertising sponsored
15 by only five campaigns, far short of the eighteen campaigns that reported payments for Google
16 advertising during the time period covered by Trask's request. For example, Google did not
17 identify information concerning advertisements sponsored by the Spokane Firefighters' Union
18 Local 29, advertisements that Google had previously disclosed to the PDC in a June 4, 2019,
19 letter. (*See Exhibit C.*)

20 4.48 On May 6, 2020, PDC staff informed Google that Seattle City Council candidate
21 Patricia Murakami had disclosed \$6,252 in expenditures made directly to Google for
22 advertisements displayed on YouTube in July and August 2019, (which was after Google's
23 June 4, 2019 letter in which Google re-affirmed that it no longer accepted political advertising
24 directed to state and local elections in Washington State). Staff asked Google to provide
25 information and books of account documenting these advertising expenditures, all of which were
26 covered by Trask's October 27, 2019, request.

1 4.49 In an email sent June 2, 2020, Google stated, “We have not located any
2 advertising expenditure by Ms. Murakami during the period in question. It is possible that despite
3 Google’s efforts, there may have been advertising that we have been unable to locate based on
4 the information that campaigns provided to the PDC.”

5 4.50 On August 27, 2019, the PDC met to consider a request for review and
6 concurrence from PDC staff, pursuant to WAC 390-37-060(2), for the Sanders and Trask
7 complaints. At the meeting, the PDC unanimously voted to refer the complaints to the Office of
8 the Attorney General (AGO) for further action pursuant to RCW 42.17A.755(4). The referral
9 was sent to AGO in a letter from PDC Chair David Ammons that was dated and transmitted to
10 the AGO on September 3, 2020.

11 4.51 On October 19, 2020, the AGO published on its official website its decision to
12 commence this action against Google.

13 **H. Google’s Terms of Service for Public Disclosure of Advertising Information**

14 4.52 Per Google’s advertising policies, advertisers are required to complete advertiser
15 identity verification. Advertisers seeking to place election advertisements through Google’s
16 advertising networks are required to complete election advertisement verification.

17 4.53 Google notifies all verified advertisers, including, but not limited to sponsors of
18 election advertisements, that Google will make public certain information about advertisements
19 placed through Google’s advertising networks.

20 4.54 Google notifies verified sponsors of election advertisements that information
21 concerning their advertisements will be made public through Google’s Political Advertising
22 Transparency Report. Google’s policy states:

23 With the information you provide during the verification process, Google will
24 verify your identity and eligibility to run election ads.

- 25 • For election ads, Google will:

- Generate, when possible, an in-ad disclosure that identifies who paid for your election ad. This means your name, or the name of the organization you represent, will be displayed in the ad shown to users.
- Publish a publicly available Political Advertising transparency report and a political ads library with data on funding sources for election ads, the amounts being spent, and more.³

4.55 Google notifies advertisers that in addition to the company’s online Political Advertising Transparency Report, affected election advertisements “are published as a public data set on Google Cloud BigQuery[,]” and that users “can export a subset of the ads or access them programmatically.”⁴

4.56 Google notifies advertisers that the downloadable election ad “dataset contains information on how much money is spent by verified advertisers on political advertising across Google Ad Services. In addition, insights on demographic targeting used in political advertisement campaigns by these advertisers are also provided. Finally, links to the actual political advertisement in the Google Transparency Report are provided.” Google states that public access to “Data for an election expires 7 years after the election.”⁵

4.57 Similarly, Google notifies advertisers placing non-election advertisements that their advertising information may be publicly disclosed. Google’s notification states that the company “will use the information you provide to: (1) Verify your identity[; and] (2) Show a disclosure including your name, or the name of the business you represent, and location, linked from any ads you run.” The notification continues, “As Google expands its transparency efforts, we may make information about your Google Ads accounts and ad campaigns publicly available including: [1] Advertiser name change history[;] [2] Ad creatives[;] [3] Dates and locations ads

³Advertising Policies Help, *About verification for election advertising in the United States*, Google (last accessed February 24, 2021), <https://support.google.com/adspolicy/answer/9002729>.

⁴Transparency Report Help Center, *Political advertising on Google FAQs*, Google (last accessed February 24, 2021), <https://support.google.com/transparencyreport/answer/9575640#zippy=%2Cwhen-does-information-about-an-ad-appear-in-the-report%2Cwhere-did-a%E2%80%A6>.

⁵Google Cloud Platform, *Political Advertising on Google*, Google (last accessed February 24, 2021), <https://console.cloud.google.com/marketplace/details/transparency-report/google-political-ads>.

1 served[;] [4] Ads removed or accounts suspended for legal or policy reasons[; and] [5] Business
2 contact information.”⁶

3 V. CLAIMS

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

6 5.1 First Claim: The State reasserts the factual allegations made above and further
7 asserts that Google, in violation of RCW 42.17A.345 and WAC 390-18-050, failed to maintain
8 documents and books of account with statutorily required information open for public inspection
9 for each political advertisement or electioneering communication that Google accepted or
10 provided for Washington State or local election campaigns since June 4, 2018. The State asserts
11 that Google further violated RCW 42.17A.345 and WAC 390-18-050 by failing to timely
12 provide all required information to Sanders and Trask for the Google political advertisements or
13 electioneering communications identified in their requests.

14 5.2 Second Claim: The State reasserts the factual allegations made above and further
15 asserts that the actions of Google stated in the above claims were negligent and/or intentional.

16 VI. REQUEST FOR RELIEF

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

18 6.1 For such remedies as the court may deem appropriate under RCW 42.17A.750,
19 including but not limited to imposition of a civil penalty, all to be determined at trial;

20 6.2 For all costs of investigation and trial, including reasonable attorneys’ fees, as
21 authorized by RCW 42.17A.780;

22 6.3 For temporary and permanent injunctive relief, as authorized by
23 RCW 42.17A.750(1)(i), including an injunction requiring Google to maintain and make
24 available for public inspection all documents and books of account required by

25 ⁶Advertising Policies Help, *About verification*, Google (last accessed February 24, 2021),
26 <https://support.google.com/adspolicy/answer/9703665#900&zippy=%2Chow-disclosures-appear-in-different-ad-formats>.

1 RCW 42.17A.345 and WAC 390-18-050 for each political advertisement or electioneering
2 communication Google accepted or provided after June 4, 2018;

3 6.4 In the event the Court finds Google intentionally violated state campaign finance
4 disclosure laws, order any penalty assessed against Google to be trebled as authorized by
5 RCW 42.17A.780; and

6 6.5 For such other legal and equitable relief as this Court deems appropriate.

7 RESPECTFULLY SUBMITTED this 24th day of February 2021.

8 ROBERT W. FERGUSON
9 Attorney General

10 *s/ S. Todd Sipe*

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Exhibit A

1 the term is used under RCW 42.17A.005(9), Google is a commercial advertiser operating in
2 the State of Washington. It accepted compensation for the placement of political advertising on
3 its platform.

4 III. JURISDICTION AND VENUE

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

8 3.2 This Court has jurisdiction over Google, a commercial advertiser conducting
9 business in the State of Washington. Google offered services and received payment from
10 persons placing political ads in Washington during each election year since 2013. Additionally,
11 the acts and omissions complained of here took place in King County.

12 3.3 Venue is proper in this Court pursuant to RCW 4.12.

13 IV. FACTUAL ALLEGATIONS

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

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

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

1 appealing, directly or indirectly, for votes or for financial or other support or opposition in any
2 election campaign.”

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

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

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

21 (a) The name of the candidate or ballot measure supported or opposed or the name of
22 the candidate otherwise identified;

23 (b) The name and address of the person who sponsored the advertising or
24 electioneering communication;

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

1 was used;

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

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

5 4.7 Google sells advertising on various segments of its platform including political
6 advertising. Accordingly, Google is a commercial advertiser as the term is used in
7 RCW 42.17A.005(9). As such, Google is required to comply with the provisions of
8 RCW 42.17A.345.

9 4.8 Since January 2008, candidates and political committees required to file
10 campaign disclosure reports with the Public Disclosure Commission have reported \$1.5 million
11 in payments to Google related to political advertising which ran on Google platforms. These
12 payments included approximately \$1.4 million paid through political consultants and other
13 agents or intermediaries, and \$56,642 paid directly to Google.

14 4.9 As an example, during election year 2017, candidates and political committees
15 reported making \$360,436 in payments related to political advertising on Google platforms.

16 4.10 Google did not obtain or maintain all information required under
17 RCW 42.17A.345 of commercial advertisers.

18 4.11 For example, Google did not obtain or maintain the names and addresses of
19 persons from whom it accepted political advertising.

20 4.12 Additionally, as an example, Google did not maintain the total cost and manner
21 of payment for services it provided for political advertising.

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

25 4.14 For example, on December 1, 2017, Eli Sanders, Associate Editor of the
26 biweekly Seattle newspaper *The Stranger*, hand-delivered a letter to Google at its Seattle

1 office, seeking information concerning all political advertising Google accepted for the
2 August 1, 2017 primary election and November 7, 2017 general election in the City of Seattle.
3 Mr. Sanders' request cited a Seattle municipal law requiring commercial advertisers to produce
4 information that is also required to be produced under RCW 42.17A.345. During his December
5 1, 2017 visit, Mr. Sanders was told that Google's political advertising data was not available
6 for public inspection.

7 4.15 Mr. Sanders sent an email on December 1, 2017 to Google's email address for
8 press inquiries notifying Google that his December 1, 2017 request had not been fulfilled.

9 4.16 Google did not provide or make available to Mr. Sanders the information he
10 requested in his December 1, 2017 letter concerning political advertising in Seattle municipal
11 elections for which Google had accepted payment and had run on its platform.

12 4.17 On May 15, 2018, Google stated that it considers an "advertiser"—within the
13 terms of its operations—to be the person bought an advertisement to be run on Google's online
14 platform. Concerning the actual sponsor of the ad, Google states that that "it may be possible to
15 draw additional conclusions from the ads themselves."

16 4.18 On April 8, 2018, Conner Edwards contacted Google via email and requested an
17 appointment on April 12, 2018 to inspect Google's documents and books of account related to
18 political advertising. Mr. Edwards cited RCW 42.17A.345 as the basis of his request.
19 Mr. Edwards' request was not limited to a particular election or jurisdiction. Google
20 acknowledged Mr. Edwards' request in an email sent on April 12, 2018, but did not promise
21 that his request for an inspection on that day would be honored.

22 4.19 On April 11, 2018, the Attorney General received a citizen action notice from
23 Mr. Edwards concerning Google's failure to provide public access to the information required
24 under RCW 42.17A.345.

25 4.20 On April 12, 2018, Mr. Edwards visited Google's Seattle office. Google did not
26 provide Mr. Edwards with access to any documents and books of account concerning political

1 advertising which ran on Google's online platforms.

2 4.21 In reports filed with the Public Disclosure Commission, candidates and political
3 committees reported payments to Google for political advertising supporting or opposing
4 selected state and local candidates.

5 4.22 During the 2013 election, sponsors of political advertising confirmed a total of
6 \$47,431 in payments to Google for political advertising.

7 4.23 During the 2014 election, sponsors of political advertising confirmed a total of
8 \$72,803 in payments to Google for political advertising.

9 4.24 During the 2015 election, sponsors of political advertising confirmed a total of
10 \$56,639 in payments to Google for political advertising.

11 4.25 During the 2016 election, sponsors of political advertising confirmed a total of
12 \$310,175 in payments to Google for political advertising.

13 4.26 During the 2017 election, sponsors of political advertising confirmed a total of
14 \$295,473 in payments to Google for political advertising.

15 4.27 To date, during the 2018 election, sponsors of political advertising confirmed a
16 total of \$709.42 in payments to Google for political advertising.

17 **V. CLAIMS**

18 Plaintiff re-alleges and incorporates by reference all the factual allegations contained in
19 the preceding paragraphs, and based on those allegations, makes the following claims:

20 5.1 First Claim: The State reasserts the factual allegations made above and further
21 asserts that Defendant Google Inc., in violation of RCW 42.17A.345, failed to maintain
22 documents and books of account specifying required information for political advertising
23 sponsored in Washington state elections from 2013 through 2018. The State further alleges that
24 Google failed to make such documents and books of account open for public inspection during
25 normal business hours for a period of three years following the applicable election.

26 5.2 Second Claim: The State reasserts the factual allegations made above and

1 further asserts that the actions of Defendant Google Inc. stated in the above claims were
2 negligent and/or intentional.

3 **VI. REQUEST FOR RELIEF**

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

5 6.1 For such remedies as the court may deem appropriate under RCW 42.17A.750,
6 including but not limited to imposition of a civil penalty, all to be determined at trial;

7 6.2 For all costs of investigation and trial, including reasonable attorneys' fees, as
8 authorized by RCW 42.17A.765(5);

9 6.3 For temporary and permanent injunctive relief, as authorized by
10 RCW 42.17A.750(1)(h);

11 6.4 In the event the Court finds Google intentionally violated state campaign
12 finance disclosure laws, order any penalty assessed against Google to be trebled as authorized
13 by RCW 42.17A.765(5); and

14 6.5 For such other legal and equitable relief as this Court deems appropriate.

15 DATED this 4th day of June, 2018.

16 ROBERT W. FERGUSON
17 Attorney General

18 
19 LINDA A. DALTON, WSBA No. 15467
20 Senior Assistant Attorney General
21 S. TODD SIPE, WSBA No. 23203
22 Assistant Attorney General
23 Attorneys for Plaintiff State of Washington
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Exhibit B

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STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

GOOGLE, INC.,

Defendant.

NO. 18-2-14130-3 SEA

STIPULATION AND JUDGMENT

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: GOOGLE, LLC
- 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: \$17,000 in reasonable fees and costs
- 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: STEPHANIE L. JENSEN, WSBA No. 42042
WILSON SONSINI GOODRICH & ROSATI

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STIPULATION

The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE), and Defendant, GOOGLE LLC (identified in the Complaint as GOOGLE INC.), desiring to resolve all allegations and claims made in the State's Complaint brought under RCW 42.17A for conduct which the State alleges violated state campaign finance laws from 2013 through the date of the Complaint filing, hereby enter into the following stipulation:

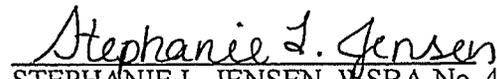
1. Defendant GOOGLE LLC stipulates that it enters into this Stipulation and Judgment for purposes of resolving this action and that its entry into this Stipulation and Judgment does not constitute an admission by Defendant GOOGLE LLC of any liability on its part and it expressly denies all material allegations in the State's Complaint.
2. Defendant GOOGLE LLC agrees to pay the State the amount of \$200,000 in resolution of all allegations and claims made in the State's Complaint brought under RCW 42.17A for conduct the State alleges violated state campaign finance laws from 2013 through the date of the Complaint filing. It agrees that such payment shall be made within 30 days of the entry of the Judgment in this action.
3. Defendant GOOGLE LLC agrees to pay the State the total amount of \$17,000 as reasonable fees and costs 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 17th day of December, 2018.

ROBERT W. FERGUSON
Attorney General

WILSON SONSINI GOODRICH & ROSATI


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


STEPHANIE L. JENSEN, WSBA No. 42042
Attorneys for Defendant GOOGLE LLC

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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, LINDA A. DALTON, Senior Assistant Attorney General and S. TODD SIPE, Assistant Attorney General, and Defendant GOOGLE LLC, appearing through its attorney, STEPHANIE L. JENSEN of Wilson Sonsini Goodrich & Rosati, 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 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 GOOGLE LLC shall pay the amount of \$200,000 to the State of Washington within 30 days of the entry of this Judgment.
2. Defendant GOOGLE LLC shall pay to the State of Washington the amount of \$17,000 as reasonable fees and costs as authorized under RCW 42.17A.765 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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WILSON SONSINI GOODRICH & ROSATI

Stephanie L. Jensen

STEPHANIE L. JENSEN, WSBA No. 42042
Attorneys for Defendant GOOGLE LLC

King County Superior Court
Judicial Electronic Signature Page

Case Number: 18-2-14130-3
Case Title: WASHINGTON STATE OF VS GOOGLE 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

Attachment 1

**SPOKANE PUBLIC SAFETY
FIRE / POLICE**

VOTE YES

PROP 1

A SAFER SPOKANE FOR ALL

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Top 5 contributors: Spokane Firefighters Local 29, Spokane Police Guild,
Washington State Council of County and City Employees-PAC, Spokane Firefighters
Credit Union, McDaniel Projects

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FIRE / POLICE**

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**SPOKANE PUBLIC SAFETY
FIRE / POLICE**

VOTE YES

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FIRE / POLICE**

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SPOKANE PUBLIC SAFETY
FIRE / POLICE

VOTE YES

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Credit Union, McDaniel Projects

SPOKANE PUBLIC SAFETY
FIRE / POLICE

VOTE YES

PROP 1

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Exhibit D



Vote YES

citizens4yelmschools.com/

VOTE YES

for Support of Yelm Schools

5

Ad : (0:30)

Vote for
Chariss Warner
Kennewick City Council
seat 5

2



Chariss Warner

Kennewick City Council seat 5

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charisswarner.com

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Ben Stuckart

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for Spokane City Council

Responsible Leadership | Practical
Solutions | A Safer Spokane

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Michael Cathcart

for Spokane City Council

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Michael Cathcart

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Vote Malchow 4 Sammamish

Sammamish City Council

Christie has been Sammamish residents' advocate at City Hall since 2016.
malchow4sammamish.com

OPEN



Re-Elect Christie Malchow



Re-Elect Malchow to the Council



Vote Malchow 4 Sammamish



Christie has been Sammamish residents' advocate at City Hall since 2016.

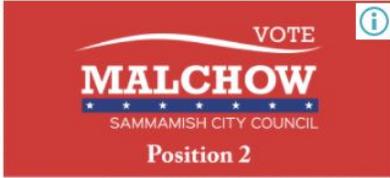


Since being elected in 2016, Christie has worked to listen to her constituents. She prides herself on open government, accessibility to residents, prioritization of infrastructure to support development, and creating standards that better reflect our City's character. As an environmental advocate, Christie has supported increasing Kokanee spawning grounds, higher standards for storm water, better protection of wetlands, and our urban forest.

Christie believes government's #1 job is public safety, through the lens of keeping Sammamish a safe place to live, work and play.

Christie has her MBA, is a small business owner and has 2 children with her husband Tom.

Photo by: Malchow & Sammamish
2017/10/18 8:11 PM Sammamish, WA 98075



Christie is Endorsed by:



Inaquaah Mayor Mary Lou Pauly
Sammamish Deputy Mayor Karen Moran
Sammamish Councilmember Tom Hornish
Sammamish Councilmember Chris Ross
and many Sammamish residents



Vote Malchow by November 5th



Position 2

