



December 12, 2017

BY E-MAIL ONLY

Erin Lama, Esq.
Politicom Law LLP
28 Liberty Ship Way, Suite 2815
Sausalito, CA 94965-3321

Re: Request for Information – Google LLC

Dear Ms. Lama:

The Ethics and Elections Commission administers Seattle Municipal Code Chapter 2.04, which governs Seattle election campaigns. SMC 2.04.280 provides as follows:

A. Each **commercial advertiser** that has accepted or provided **political advertising** during the election campaign shall maintain open for public inspection during the campaign and for a period of no less than three years after the date of the applicable election, during normal business hours, documents and books of account which shall specify:

1. The names and addresses of persons from whom it accepted political advertising;
2. The exact nature and extent of the advertising services rendered; and
3. The consideration and the manner of paying that consideration for such services.

B. Each commercial advertiser that must comply with subsection A of this section shall deliver to the Executive Director, upon his or her request, copies of such information as must be maintained open for public inspection pursuant to subsection A of this section.

The two bolded terms are defined in SMC 2.04.010 as follows:

“Commercial advertiser” means any person who sells the service of communicating messages or producing political advertising.

“Political advertising” means any advertising displays, newspaper ads, billboards, signs, brochures, articles, tabloids, flyers, letters, radio or television presentations, or other means of mass communication, used for

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the purpose of appealing, directly or indirectly, for votes or for financial or other support in any election campaign.

Our records show that your client, Google, was paid no less than \$150,000 to communicate political advertising to its users via means of mass communication in the 2017 election cycle. As such, Google is a commercial advertiser as that term is defined in SMC 2.04.010.

As the Commission's Executive Director, I am requesting under SMC 2.04.280.B that Google provide me, by January 2, 2018, with the information it is required to maintain for public inspection under SMC 2.04.280.A. If you have any questions about this request, please contact me at 206.684.8577.

Very truly yours,



Wayne Barnett
Executive Director