WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION

COMPLAINT

The Seattle Times / Climate Lab / Initiative 2117

RESPONDENT NAMES

The Seattle Times Company; Seattle Foundation; Clean & Prosperous Washington; Clean & Prosperous Institute; Green Jobs PAC; No on 2117

COMPLAINANT NAME

Ari Hoffman

COMPLAINT DESCRIPTION

The Seattle Times Company and potentially related organizations are in violation of, or should be investigated for potential violations of, RCW 29B.25.090 and other applicable Washington campaign-finance reporting requirements for failure to report the financial value and, where required, include appropriate sponsor identification for political advertising, expenditures, contributions and/or in-kind support associated with communications opposing Initiative 2117.

As detailed in Appendix A, The Seattle Times and its philanthropically funded Climate Lab repeatedly published and distributed communications concerning Initiative 2117, the Climate Commitment Act, the financial benefits attributed to the Climate Commitment Act, carbon-market revenues, programs financed through those revenues and projects allegedly threatened if voters approved I-2117.

The Seattle Times Editorial Board separately and expressly appealed for Washington voters to reject Initiative 2117.

The presently identified communications have a minimum calculable integrated commercial-equivalent value of at least $44,090.64 using The Seattle Times' own published 2024 advertising pricing as a benchmark.

That figure should not be interpreted as a ceiling.

Publicly available information does not establish the full value of homepage promotion, additional digital impressions, newsletters, Facebook distribution, X/Twitter distribution, Instagram distribution, mobile distribution, push notifications, print republication, photography, graphics, video, paid social amplification, search-engine promotion or outside research and media services associated with the identified communications.

If the Commission determines those additional distributions or services constitute reportable activity, the complete commercial-equivalent value could conceivably exceed $100,000.

Public records further establish that Climate Lab was funded largely through outside philanthropic support and that this financial support enabled The Seattle Times to add four dedicated newsroom positions and produce climate coverage that then-Publisher and CEO Frank A. Blethen stated would not otherwise have been available.

Seattle Foundation served as Climate Lab's fiscal sponsor.

During the same election campaign, Seattle Foundation expressly joined the effort opposing Initiative 2117 and published: "Protect the Climate Commitment Act: Vote No on I-2117."

Seattle Foundation expressly told Washingtonians to vote against I-2117 and identified the political communication: "Paid for by: Seattle Foundation."

Clean & Prosperous Washington separately states that it played a leading role in defeating Initiative 2117 and worked closely with the campaign to ensure its messaging reached Washington voters.

Its related Clean & Prosperous Institute created and promoted a project known as "Risk of Repeal," which identified Climate Commitment Act-funded investments and projects allegedly threatened if Initiative 2117 passed.

Clean & Prosperous reports that it distributed Risk of Repeal materials and held webinars specifically intended to help organizations, individuals and the media use the project.

On October 18, 2024, approximately 18 days before Election Day, The Seattle Times Climate Lab published: "WA's carbon market pumps billions of dollars to state projects. What happens if it vanishes?"

Clean & Prosperous subsequently specifically identified that Seattle Times communication as an example of Risk of Repeal media amplification.

The amount and nature of research, data, services, communications, story assistance, distribution assistance and other things of value provided to The Seattle Times in connection with these election-period communications cannot be determined from publicly available records and warrant investigation by the PDC.

WHAT IMPACT DO THE ALLEGED VIOLATION(S) HAVE ON THE PUBLIC?

Washington voters are entitled to know the source and value of political advertising, campaign expenditures and in-kind contributions made to influence statewide ballot propositions.

The Seattle Times is one of Washington's largest commercial media companies and sells advertisers access to its readers through its newspaper, SeattleTimes.com, mobile applications, newsletters, social-media audiences and other distribution channels.

The Times also commercially sells native and branded content in article form.

The Seattle Times markets sponsored content as a way for advertisers to reach its audience through professionally produced storytelling. Commercial packages can include writing, digital impressions, social distribution, homepage exposure and other promotional services.

Climate Lab differs from an ordinary internally financed newsroom beat in one material respect: The Seattle Times itself states that Climate Lab is funded largely through philanthropic support.

That outside funding enabled The Times to add four newsroom positions and create additional climate coverage.

The public therefore has a significant interest in knowing whether any of that outside financial support, research, services or other assistance was connected to communications concerning Initiative 2117 and, if so, whether resulting contributions, expenditures or political advertising were properly disclosed.

The issue is particularly significant because Climate Lab's fiscal sponsor, Seattle Foundation, separately engaged in express advocacy against Initiative 2117 during the same election.

Additionally, an organization deeply involved in defending the Climate Commitment Act, Clean & Prosperous, states that it developed a Risk of Repeal project, conducted outreach specifically to the media and subsequently identified Seattle Times Climate Lab coverage as amplification of that project.

Those facts warrant investigation.

LIST OF ATTACHED EVIDENCE OR CONTACT INFORMATION WHERE EVIDENCE MAY BE FOUND

The attached complaint and Appendices A through G provide evidence presently gathered concerning the alleged activity.

Additional relevant records are believed to be held by:

- The Seattle Times Company

- Seattle Foundation
- Clean & Prosperous Washington
- Clean & Prosperous Institute
- Green Jobs PAC
- No on 2117
- disclosed financial supporters of The Seattle Times Climate Lab

LIST OF POTENTIAL WITNESSES WITH CONTACT INFORMATION WHERE AVAILABLE

Frank A. Blethen
Publisher and CEO of The Seattle Times Company during the relevant 2024 period; currently an emeritus member of The Seattle Times Editorial Board.

Amanda Zhou
Seattle Times climate reporter and author of the October 18, 2024 Climate Lab communication identified in Appendix A.

Isabella Breda
Seattle Times environmental reporter and author/co-author of multiple Climate Lab communications concerning the Climate Commitment Act and Initiative 2117.

Conrad Swanson
Seattle Times climate reporter and co-author of the June 12, 2024 carbon-market communication identified in Appendix A.

Kate Riley
Editorial Page Editor, The Seattle Times.

Melissa Davis
Member of The Seattle Times Editorial Board during the relevant period.

Josh Farley
Member of The Seattle Times Editorial Board during the relevant period.

Alex Fryer
Member of The Seattle Times Editorial Board during the relevant period.

Claudia Rowe
Member of The Seattle Times Editorial Board during the relevant period.

Carlton Winfrey
Member of The Seattle Times Editorial Board during the relevant period.

Kendall Hill
Seattle Foundation staff member and author of the June 25, 2024 “Protect the Climate Commitment Act: Vote No on I-2117” communication.

Michael Mann
Executive Director, Clean & Prosperous.

Representatives of Seattle Foundation, Clean & Prosperous Washington, Clean & Prosperous Institute, Green Jobs PAC, No on 2117 and the Climate Lab funders identified in Appendix C may possess additional relevant information.

THE SEATTLE TIMES FAILED TO DECLARE POTENTIALLY REPORTABLE POLITICAL ADVERTISING WITH A PRESENTLY CALCULABLE MINIMUM COMMERCIAL-EQUIVALENT VALUE OF AT LEAST $44,090.64

The identified Seattle Times communications have an ascertainable commercial value.

The Seattle Times' own contemporaneous 2024 advertising products provide an appropriate preliminary benchmark.

The Seattle Times offered a commercial package consisting of full-page Seattle Times advertising, 200,000 digital impressions, and a branded-content article for approximately $5,511.33.

The same year's commercial materials demonstrate that advertisers could purchase article-form content, digital impressions and print exposure as an integrated package.

Accordingly, if a communication identified in Appendix A is determined to constitute reportable political advertising or an in-kind contribution, $5,511.33 provides a reasonable integrated commercial-equivalent benchmark for comparable Seattle Times publication and distribution.

Eight presently identified Seattle Times communications concerning I-2117 therefore have a preliminary integrated commercial value of 8 x $5,511.33 = $44,090.64.

The complainant submits that this figure represents the lowest presently calculable integrated value based upon the communications identified to date and publicly available Seattle Times pricing.

It is not an estimate of the complete value.

The calculation does not assign additional value to:

- repeated SeattleTimes.com homepage promotion
- homepage impressions beyond the benchmark
- section-front placement
- mobile application exposure
- additional digital impressions
- print distribution or republication
- email newsletter placements
- newsletter-native advertising equivalents
- X/Twitter posts
- Facebook posts
- Instagram posts, reels or stories
- paid or boosted social-media distribution
- browser or mobile push notifications
- photography
- graphics and data visualizations
- video
- search-engine optimization
- audience targeting
- reporter and editor labor beyond the commercial-content benchmark
- research supplied by third parties
- media-relations services
- database and mapping work
- source development
- campaign-connected messaging assistance
- other outside services used to produce or amplify the communications

Accordingly, the complete value could be substantially higher.

If the identified articles received additional commercially valuable distribution through homepage placement, newsletters, social media, mobile applications and push notifications, each communication could involve several separately valuable commercial placements rather than one isolated article.

The aggregate commercial-equivalent value could therefore conceivably exceed $100,000 if the Commission determines the additional distribution and services were reportable.

That potential becomes greater if the Commission determines that some portion of the approximately $176,832 in Clean & Prosperous Institute CCA Mapping/Education expenditures constituted research, mapping, data, media relations, source development or other things of value supplied for use in election-related communications.

The complainant is not presently alleging that the entire $176,832 constitutes a campaign contribution.

Rather, the amount demonstrates the substantial scale of the research and media activity surrounding Risk of Repeal and establishes why the nature and value of any services provided to The Seattle Times should be investigated.

The complete commercial value cannot be calculated without records primarily controlled by The Seattle Times and related organizations.

The PDC should obtain those records.

PRESENTLY CALCULABLE INTEGRATED MINIMUM: $44,090.64
POTENTIAL COMPLETE VALUE: CONCEIVABLY IN EXCESS OF $100,000

THE SEATTLE TIMES' ARTICLE-ONLY PRODUCTION VALUE PROVIDES A LOWER FLOOR

Even if the PDC declines to use the integrated $5,511.33 benchmark, The Seattle Times' own advertising materials establish an independent article-production value.

The Times' 2024 packages demonstrate an approximately $1,500 incremental charge for branded content, while other packages placed the branded-content addition at approximately $1,750.

Eight presently identified communications therefore have an article-production equivalent of LOW: 8 x $1,500 = $12,000 and HIGH: 8 x $1,750 = $14,000.

This calculation removes much of the value attributable to audience access, digital impressions, promotion and distribution.

For that reason, $12,000-$14,000 represents the article-production-only floor; $44,090.64 represents the lowest presently calculable integrated commercial-equivalent value; and the potential complete commercial-equivalent value could conceivably exceed $100,000 following investigation.

THE SEATTLE TIMES IS A COMMERCIAL ADVERTISER AND PAID CONTENT CREATOR

The Seattle Times sells commercial advertising through the same media environment in which the communications identified in Appendix A appeared.

Seattle Times Media Solutions offers commercial services including:

- branded-content articles
- native advertising
- sponsored content
- digital display advertising
- newspaper advertising
- homepage and section takeovers
- newsletter advertising
- social-media advertising
- paid social campaigns
- email campaigns
- targeted display
- programmatic advertising
- video advertising
- content-marketing services

The Times states that native advertising on SeattleTimes.com allows advertiser content to appear in article form. Its sponsored-content products can also include professional writing, social sharing and SeattleTimes.com homepage promotion.

The commercial value of publishing and distributing content through The Seattle Times therefore can be calculated using the market in which The Times itself operates.

CLIMATE LAB IS PAID FOR BY OUTSIDE FUNDERS

The Seattle Times launched Climate Lab in February 2024 and publicly described it as a multi-year journalism initiative funded largely by philanthropic support.

The Times stated that it dedicated four staff positions to Climate Lab.

At Climate Lab's launch, then-Publisher and CEO Frank A. Blethen stated: "Community investment enables us to provide readers with a wealth of critical coverage not otherwise available."

The initial disclosed financial supporters included Bullitt Foundation; Becky Hughes and Michael Hughes; University of Washington; and Walker Family Foundation.

The Times identified Seattle Foundation as Climate Lab's fiscal sponsor.

By the 2024 election period, additional disclosed Climate Lab supporters included CO2 Foundation; Jim and Birte Falconer; Henry M. Jackson Foundation; Martin-Fabert Foundation; Craig McKibben and Sarah Merner; among others.

The amount of each contribution, timing of the contributions, restrictions on those funds, terms of the grants and communications between the funders and Climate Lab concerning the Climate Commitment Act or Initiative 2117 are not apparent from the published articles.

Those records should be obtained by the PDC.

CLIMATE LAB'S FISCAL SPONSOR EXPRESSLY ADVOCATED AGAINST INITIATIVE 2117

Seattle Foundation served as fiscal sponsor for Climate Lab while simultaneously engaging in express electoral advocacy against Initiative 2117.

On June 25, 2024, Seattle Foundation published: "Protect the Climate Commitment Act: Vote No on I-2117."

Seattle Foundation described the Climate Commitment Act as an important policy, described consequences it attributed to repeal and stated that it was joining other organizations in endorsing the campaign opposing Initiative 2117.

The Foundation expressly urged Washington voters: "Vote No on I-2117."

It identified the communication: "Paid for by: Seattle Foundation."

Seattle Foundation has additionally stated that organizations within its philanthropic network were leading the No on 2117 effort and that several partners received support for political or civic activity associated with that effort.

The PDC should determine whether Seattle Foundation merely provided ministerial fiscal-sponsorship services to Climate Lab or whether its financial, administrative, grantmaking or other resources supported the production or distribution of Climate Lab communications regarding the Climate Commitment Act and Initiative 2117.

CLEAN & PROSPEROUS WORKED CLOSELY WITH THE CAMPAIGN AND PROVIDED “RISK OF REPEAL” MATERIAL TO THE MEDIA

Clean & Prosperous Washington states that it played a leading role in defeating Initiative 2117.

Its own reporting states that it worked closely with the campaign to ensure its messaging reached Washington voters.

Clean & Prosperous further reports that more than $3 million was raised through Green Jobs PAC for paid media.

Its related organization, Clean & Prosperous Institute, developed Risk of Repeal.

Risk of Repeal mapped more than 2,000 Climate Commitment Act investments representing approximately $2 billion in spending.

Clean & Prosperous reports that Risk of Repeal distributed five newsletters and press releases, reached approximately 2,700 readers, conducted webinars to help organizations, individuals and the media use the project, and attracted approximately 153 webinar attendees.

Clean & Prosperous Institute separately reported approximately $176,832 in CCA Mapping / Education expenditures.

The relationship between this six-figure research/media operation and election-period Seattle Times Climate Lab coverage warrants investigation.

CLEAN & PROSPEROUS EXPRESSLY IDENTIFIED SEATTLE TIMES REPORTING AS "RISK OF REPEAL" AMPLIFICATION

On October 18, 2024, approximately 18 days before Election Day, The Seattle Times Climate Lab published: "WA's carbon market pumps billions of dollars to state projects. What happens if it vanishes?"

The article was authored by Amanda Zhou.

Clean & Prosperous subsequently included that Seattle Times story in material describing "RISK OF REPEAL amplification."

Clean & Prosperous stated that Risk of Repeal helped media produce stories concerning the impact of the Climate Commitment Act.

This creates a direct factual question regarding what portion, if any, of approximately $176,832 in CCA Mapping/Education expenditures produced research, data, mapping, media outreach, project identification, source identification or other services ultimately used by The Seattle Times.

Potential relevant items include:

- databases
- spreadsheets
- maps
- project lists
- dollar figures
- source contacts
- interviews
- media briefings
- webinars
- press releases
- graphics
- story pitches
- other communications assistance

Those services themselves could possess substantial commercial value in addition to the estimated $44,090.64 in publication and distribution value. The PDC should determine the nature and fair-market value of any such assistance.

THE SEATTLE TIMES EXPRESSLY PUBLISHED COVERAGE ABOUT SHOWING THE CCA'S “VALUE” BEFORE IT WENT TO VOTERS

On March 11, 2024, Climate Lab reporter Isabella Breda published: "WA lawmakers rush to show climate act's value before it goes to ballot."

The headline directly connected demonstration of the Climate Commitment Act's "value" with the approaching ballot fight.

This communication was produced through a newsroom operation The Seattle Times states was financed largely through outside philanthropic contributions.

The PDC should determine whether advocacy organizations, state agencies, Climate Lab donors or organizations later involved in the No-on-I-2117 effort supplied information, project examples, data, research, source contacts, interviews, graphics, reports or other things of value used in producing or promoting this communication.

THE IDENTIFIED ACTIVITY WARRANTS EXAMINATION UNDER WASHINGTON'S POLITICAL ADVERTISING REQUIREMENTS

WAC 390-05-290 contains an exemption for specified news, feature and editorial communications in regularly published media where payment for the space or time is not normally required.

This complaint does not rely merely upon disagreement with Seattle Times editorial opinions.

Rather, it presents specific evidence involving an outside-funded newsroom operation; a fiscal sponsor simultaneously engaged in express ballot-measure advocacy; an advocacy organization stating it worked closely with the campaign; a six-figure research and media operation specifically concerning the Risk of Repeal; outreach and training directed specifically to the media; and a Climate Lab communication subsequently claimed by that organization as Risk of Repeal amplification.

The Commission should determine whether payment, campaign-connected services, research, data, media assistance or other things of value were provided in connection with particular communications and whether any resulting activity was reportable.

REQUEST FOR PDC INVESTIGATION

I request that the Public Disclosure Commission investigate this matter fully and hold all parties accountable for any violations established through the evidence.

1. All Climate Lab grant agreements and donor agreements in effect during 2024.
2. The amount contributed by each Climate Lab funder.
3. The dates of each Climate Lab contribution.
4. Restrictions, conditions or reporting requirements associated with each contribution.
5. Seattle Foundation's Climate Lab fiscal-sponsorship agreement.
6. The dollar value of Seattle Foundation's fiscal-sponsorship services.
7. Communications between Seattle Foundation and Seattle Times personnel concerning Initiative 2117.
8. Communications between Seattle Foundation and Seattle Times personnel concerning the Climate Commitment Act.
9. Communications between Seattle Times personnel and Clean & Prosperous Washington.
10. Communications between Seattle Times personnel and Clean & Prosperous Institute.
11. Communications between Seattle Times personnel and Green Jobs PAC.
12. Communications between Seattle Times personnel and No on 2117.
13. Risk of Repeal spreadsheets supplied to Seattle Times personnel.
14. Risk of Repeal databases supplied to Seattle Times personnel.
15. Risk of Repeal project lists supplied to Seattle Times personnel.
16. Maps and graphics supplied to Seattle Times personnel.

17. Records identifying Seattle Times personnel attending Risk of Repeal webinars or briefings.
18. Story pitches and media outreach concerning Initiative 2117 or repeal of the Climate Commitment Act.
19. Source referrals supplied by campaign-connected organizations.
20. Seattle Times 2024 advertising rate cards.
21. Seattle Times sponsored-content rate cards.
22. Native-advertising rates.
23. SeattleTimes.com homepage advertising and promotional rates.
24. Digital impression rates.
25. Newsletter advertising rates.
26. Social-media advertising and promotional rates.
27. Homepage impression records for every communication identified in Appendix A.
28. Actual page-view records for every communication identified in Appendix A.
29. Seattle Times Facebook posts promoting Appendix A communications.
30. Seattle Times X/Twitter posts promoting Appendix A communications.
31. Seattle Times Instagram posts, stories and reels promoting Appendix A communications.
32. Seattle Times newsletter placements promoting Appendix A communications.
33. Browser and mobile push notifications promoting Appendix A communications.
34. Records of paid or boosted social-media activity.
35. Print publication and republication records.
36. Search-engine or other paid promotional activity relating to the communications.
37. Relevant PDC reports concerning Seattle Foundation.
38. Relevant PDC reports concerning Clean & Prosperous.
39. Relevant PDC reports concerning Green Jobs PAC.
40. Relevant PDC reports concerning No on 2117.

The Commission should determine the full fair-market value of any communication, service, contribution, political advertising, expenditure or in-kind contribution determined to be reportable and whether the activity was accurately and timely disclosed.

Signed:

Ari Hoffman
Complainant

APPENDIX A

Seattle Times Potential Undeclared Political Advertising and/or In-Kind Contributions Opposing Initiative 2117

Relevant period: February 4, 2024 through November 5, 2024

CLIMATE LAB COMMUNICATIONS

Estimated value: article-production-only value approximately $1,500-$1,750 per qualifying communication; integrated commercial-equivalent benchmark up to approximately $5,511.33 per qualifying communication, based on a contemporaneous 2024 Seattle Times commercial package. Additional distribution and third-party services remain unvalued.

1. March 11, 2024 - Isabella Breda

“WA lawmakers rush to show climate act's value before it goes to ballot”

Classification: Explicitly or implicitly communicating the value of the Climate Commitment Act before voters considered repeal.

Election nexus: Direct.

Article-only value: $1,500-$1,750.

Integrated commercial-equivalent benchmark: up to $5,511.33.

Priority: VERY HIGH.

2. April 24, 2024 - Amanda Zhou; Isabella Breda contributing

“WA to launch EV rebate program. Here's what you could save”

Classification: Explicitly or implicitly communicating public benefits associated with state climate spending during the Initiative 2117 campaign.

Election nexus: Direct/medium-high.

Article-only value: $1,500-$1,750.

Integrated commercial-equivalent benchmark: up to $5,511.33.

Priority: HIGH.

3. June 12, 2024 - Conrad Swanson and Isabella Breda

“WA carbon auction demand drops, prices remain lower”

Classification: Direct communication concerning Initiative 2117 and the Climate Commitment Act.

Election nexus: Direct.

Article-only value: $1,500-$1,750.

Integrated commercial-equivalent benchmark: up to $5,511.33.

Priority: MEDIUM/HIGH.

4. June 2024

“WA to distribute $72 million from carbon market auctions for community energy projects”

Classification: Explicitly or implicitly communicating financial and community benefits produced by the program subject to repeal through Initiative 2117.

Election nexus: Medium-high.

Article-only value: $1,500-$1,750.

Integrated commercial-equivalent benchmark: up to $5,511.33.

Priority: HIGH.

5. October 18, 2024 - Amanda Zhou

“WA's carbon market pumps billions of dollars to state projects. What happens if it vanishes?”

Classification: Explicitly or implicitly communicating consequences of passage of Initiative 2117.

Election nexus: Extremely high; approximately 18 days before Election Day.

Article-only value: $1,500-$1,750.

Integrated commercial-equivalent benchmark: up to $5,511.33.

Priority: HIGHEST.

Risk of Repeal nexus: Clean & Prosperous subsequently identified this specific Seattle Times story as Risk of Repeal amplification.

Investigation requested: determine whether Clean & Prosperous/Clean & Prosperous Institute supplied databases, spreadsheets, maps, project lists, dollar figures, graphics, media kits, interviews, source contacts, briefings, webinars, press releases, story pitches or other services or things of value.

CLIMATE LAB INTEGRATED VALUE
5 x $5,511.33 = $27,556.65

SEATTLE TIMES EDITORIAL BOARD COMMUNICATIONS

6. August 30, 2024

“Fact-checking the Initiative 2117 debate”

Direct election communication concerning Initiative 2117 following an August 15 presentation/debate involving Brian Heywood, Todd Myers, Rep. Joe Fitzgibbon and Seattle Metropolitan Chamber President Rachel Smith.

Article-only benchmark: $1,500-$1,750.

Integrated benchmark if determined reportable: up to $5,511.33.

7. August 30, 2024

“The Seattle Times editorial board recommends: Keep WA's Climate Commitment Act - vote no on I-2117”

Explicitly appealing for voters to oppose Initiative 2117. The headline expressly directed voters to “vote no on I-2117.”

Article-only benchmark: $1,500-$1,750.

Integrated benchmark if determined reportable: up to $5,511.33.

8. October 2024

“With I-2117 choice, WA voters could influence national climate policy”

Explicitly or implicitly appealing for voter opposition to Initiative 2117.

Article-only benchmark: $1,500-$1,750.

Integrated benchmark if determined reportable: up to $5,511.33.

EDITORIAL INTEGRATED BENCHMARK
3 x $5,511.33 = $16,533.99

COMBINED PRESENTLY CALCULABLE INTEGRATED TOTAL
$44,090.64

ADDITIONAL SEATTLE TIMES OPINION CONTENT REQUIRING VERIFICATION

9. “I-2117 is scorched-earth folly” - Verify author and date.

10. “No on I-2117 to retain Climate Commitment Act” - Verify whether staff editorial, guest commentary or other opinion material.

11. “Climate Commitment Act: Don't repeal” - Appears to involve letter-to-the-editor material; do not include as institutional Seattle Times advocacy without evidence.

12. “Climate Commitment Act: We are all part of the problem - and solution” - Appears to involve letter-to-the-editor content; do not presently include in valuation.

APPENDIX B

Seattle Times Commercial Advertising Valuation

The Seattle Times' 2024 published advertising packages provide contemporaneous commercial benchmarks.

Valuation Item	Amount / Benchmark
Published package	Full-page advertising + 200,000 digital impressions + branded-content article: approximately $5,511.33
Article-production-only value	Approximately $1,500-$1,750 per qualifying communication
Eight identified communications - article floor	$12,000-$14,000
Eight identified communications - integrated minimum	$44,090.64
Potential full commercial-equivalent value	Unknown pending investigation and conceivably in excess of $100,000

Why $44,090.64 remains conservative: the integrated calculation does not separately value Facebook, X/Twitter, Instagram, newsletters, push notifications, repeated homepage exposure, impressions exceeding the package benchmark, app exposure, additional print distribution, photography, graphics, video, third-party research, third-party media services, mapping, database development or source development.

APPENDIX C

Climate Lab Funders and Associated Persons

The Seattle Times Company: Frank A. Blethen - Publisher and CEO during the relevant 2024 period.

Initial Climate Lab funders

- Bullitt Foundation
- Becky Hughes and Michael Hughes
- University of Washington
- Walker Family Foundation

Fiscal sponsor

- Seattle Foundation

Additional supporters identified during the 2024 election period

- CO2 Foundation
- Jim and Birte Falconer
- Henry M. Jackson Foundation
- Martin-Fabert Foundation
- Craig McKibben and Sarah Merner
- other subsequently disclosed supporters

Records requested for each funder: amount; date; grant agreement; restrictions; reporting requirements; communications with Climate Lab; communications concerning I-2117; communications concerning the CCA; political expenditures concerning I-2117; and relationships with campaign organizations opposing I-2117.

APPENDIX D

Seattle Foundation and Initiative 2117

Climate Lab relationship: Seattle Foundation served as fiscal sponsor for Climate Lab.

June 25, 2024 political communication

Author: Kendall Hill

Title: “Protect the Climate Commitment Act: Vote No on I-2117”

Express electoral advocacy: “Vote No on I-2117.”

Sponsor identification: “Paid for by: Seattle Foundation.”

Investigation requested: commercial value of the June 25 communication; staff/production costs; distribution costs; grants supporting organizations opposing Initiative 2117; amount and nature of Climate Lab fiscal-sponsorship services; communications with Climate Lab personnel concerning Initiative 2117 and the Climate Commitment Act; whether fiscal-sponsorship resources overlapped with election-related activity; and whether all political expenditures were properly reported.

APPENDIX E

Clean & Prosperous / Risk of Repeal

Michael Mann - Executive Director, Clean & Prosperous.

Clean & Prosperous reports that Risk of Repeal mapped more than 2,000 CCA investments representing approximately $2 billion in investments; distributed five newsletters/press releases; reached approximately

2,700 readers; conducted webinars for organizations, individuals and media; reached approximately 153 webinar participants; and helped generate or amplify media coverage.

$176,832
Reported CCA Mapping / Education expenditures

Clean & Prosperous separately reports involvement in the campaign defending the CCA and states that its advocacy operation worked closely with the campaign to get its messaging to voters. It subsequently identified the October 18 Seattle Times Climate Lab article as Risk of Repeal amplification.

Records requested: Seattle Times reporter correspondence; emails with Amanda Zhou, Isabella Breda and Conrad Swanson; Risk of Repeal databases; project lists; maps; graphics; media kits; press releases; webinar attendance records; reporter briefings; source referrals; story pitches; communications with No on 2117; communications with Green Jobs PAC; and accounting showing what activities were funded through CCA Mapping/Education expenditures.

Potential additional value: if any portion of the $176,832 provided research, media outreach, databases, mapping, source development or other things of value incorporated into reportable election communications, that value should be added to the commercial publication and distribution value identified in Appendix B. The complainant does not presently claim that the entire $176,832 constitutes a contribution.

APPENDIX F

Seattle Times Social Media, Newsletter, Homepage and Mobile Distribution

The following categories cannot presently be valued completely because publicly searchable archives and internal impression records are incomplete. They should be obtained during investigation.

X / Twitter

- Obtain the 2024 @seattletimes account archive and identify every post containing or promoting I-2117, Initiative 2117, Climate Commitment Act, carbon market, Climate Lab, “value before it goes to ballot,” “what happens if it vanishes,” “vote no on I-2117,” and URLs associated with Appendix A communications.
- For each post, determine date, text, impressions, engagement, whether boosted, equivalent commercial social-media rate and whether it constitutes separate distribution of political advertising.

Facebook

- Obtain all Seattle Times Facebook posts promoting Appendix A communications. Determine for each: date, post language, linked communication, impressions, engagement, paid/organic status, boost expenditure and equivalent commercial value.

Instagram

- Obtain all Seattle Times Instagram posts, reels and stories concerning I-2117, the Climate Commitment Act, Climate Lab CCA coverage and Appendix A communications. Determine reach and commercial value.

Newsletters

- Obtain all newsletter distributions of identified communications, including Morning Brief, Evening Brief, Opinion newsletters, topical newsletters and other subscriber emails. For each, obtain send date, subject line, placement, circulation, open rate, click-through rate and corresponding Seattle Times newsletter advertising value.

SeattleTimes.com Homepage

- Obtain homepage placement dates, placement duration, homepage impressions, section-front placement, desktop views, mobile views, app views and corresponding commercial value.

Paid or Boosted Social Media

- Obtain all records concerning Facebook boosts, Instagram boosts, X/Twitter promotion, paid distribution, audience targeting and corresponding expenditures.

Push Notifications

- Obtain all Seattle Times mobile application notifications, browser notifications, breaking-news alerts and other push distribution concerning I-2117 or communications identified in Appendix A.

If each of the eight identified communications received multiple additional commercially valuable placements, total campaign-equivalent value could substantially exceed the current $44,090.64 minimum and potentially exceed $100,000.

APPENDIX G

Political Organizations and Potential Beneficiaries

No on 2117
Political committee opposing Initiative 2117.

Green Jobs PAC
Political committee whose activity included opposition to Initiative 2117. Clean & Prosperous reports that more than $3 million was raised through Green Jobs PAC for paid media.

Clean & Prosperous Washington
Reports playing a leading role in the coalition defeating Initiative 2117 and working closely with the campaign to ensure its messaging reached voters.

Clean & Prosperous Institute
Developed Risk of Repeal and engaged in substantial research, mapping and media outreach concerning the consequences of CCA repeal.

Seattle Foundation
Expressly advocated a No vote on Initiative 2117 while serving as Climate Lab's fiscal sponsor.

PRELIMINARY TOTAL POTENTIAL VALUE

ARTICLE-PRODUCTION-ONLY FLOOR
$12,000-$14,000

LOWEST PRESENTLY CALCULABLE INTEGRATED COMMERCIAL-EQUIVALENT VALUE
$44,090.64

Additional presently unvalued activity includes Seattle Times X/Twitter distribution; Facebook distribution; Instagram distribution; newsletters; repeated homepage placement; mobile-app exposure; impressions beyond the benchmark; print republication; push notifications; paid/boosted social media; graphics; photography; video; third-party research; Risk of Repeal data; mapping; media-relations services; source development; and other election-related services determined reportable.

POTENTIAL FULL COMMERCIAL-EQUIVALENT VALUE
Unknown pending investigation and conceivably in excess of $100,000

The complainant does not allege that $100,000 is presently established as a contribution. Rather, $44,090.64 is the lowest presently calculable integrated figure supported by the identified communications and available Seattle Times commercial pricing. The full value cannot be calculated without records controlled by The Seattle Times and relevant third parties. The Commission should obtain those records and determine the actual fair-market value of any activity determined to constitute political advertising, contributions, in-kind contributions or reportable expenditures.

CERTIFICATION

I certify or declare under penalty of perjury under the laws of the State of Washington that the information provided with this complaint is true and correct to the best of my knowledge and belief.

Ari Hoffman

Date: __________________

Place signed: __________________