

June 19, 2017

Public Disclosure Commission

711 Capitol Way #206
PO BOX 40908
Olympia, WA 98504-0908

Office of the Attorney General

State of Washington
1125 Washington Street, SE
PO Box 40100
Olympia, A 98504

ETHICS & ELECTIONS VIOLATION COMPLAINT AGAINST JUST WANT PRIVACY

Respondent:

Just Want Privacy
16212 Bothell Everett Highway
Suite F113
Mill Creek, WA 98012

RE: Violation of Chapter 42.17a RCW

In violation of the Fair Campaign Practices Act, the Just Want Privacy PAC has failed to report staff time and campaign resources from individuals and organizations. Nor have these individuals or groups, Alliance Defending Freedom, the Family Policy Institute of Washington, nor WA State Representative Graham Hunt, have reported their contributions as required by **RCW 42.17a**.

501(c)(3) Family Policy Institute of Washington Is Making Significant Unreported In-Kind Contributions to Just Want Privacy

The Family Policy Institute of Washington is a 501(c)(3) organization. It failed to report significant campaign activities carried out by the (c)(3) arm of its organization, which – similar to the issues that have led the Attorney General’s Office to investigate the Freedom Foundation -- puts them afoul of PDC rules, state laws pertaining to campaign finance disclosures, and potentially IRS laws regarding the activities of organizations with tax-exempt status.

The Just Want Privacy campaign is spearheaded by the Family Policy Institute of Washington and they share resources and staff, however no staff time, office space or other campaign resources from FPIW have been declared in any of Just Want Privacy’s C4s as in-kind services to campaign.

The Just Want Privacy C1 lists FPIW President Joseph Backholm as the campaign chairman. Their own communications show that resources are being committed by the Family Policy Institute of Washington, for example:

1. FPIW Gender Revolution Events Are In Fact I-1552 Campaign Organizing Events

As the Southern Law Poverty Law Center reported in their April 24, 2017 blog post "[Washington Anti-LGBT Seminars Begin Organizing For Another Bathroom Bill Initiative](#)", Joseph Backholm has been speaking around the state at "Gender Revolution" events organized and promoted by the Family Policy Institute of Washington and encouraging attendees to get actively involved in the Just Want Privacy campaign (Appendix 3):

The larger purpose of the seminars, however, became clear as the talk wound on and Backholm began describing the "cultural" part of how people could combat the "gender revolution"—namely, to encourage participants to engage in the political battle over gender by supporting and helping to promote the FPIW's new anti-transgender "bathroom bill," Initiative 1552. [...]

He urged seminar-goers to get involved on three levels—interpersonally, at their churches, and politically. He described the churches as being "at war, for sure," and urged everyone at the seminar to help organize support for the drive to gather signatures for I-1552.

[Video from a Gender Revolution event](#) with the Kitsap Patriots Tea Party uploaded April 24, 2017 shows Backholm speaking on behalf of the Family Policy Institute of Washington but advocating for Just Want Privacy and encouraging signature gathering for their initiative petitions (Appendix 4, around the 11:00 minute mark):

"There is a table back there and I told Rebecca if you try to leave without a petition, you might not like what happens. So that's just my warning. Make sure you pick up one on the way out."

The [event page of the FPIW Facebook page](#) shows separate event pages created for ten different events in meeting spaces in hotels across the state during the month of April 2017: Aberdeen, Pasco, Spokane, Sequim, Bremerton, Tacoma, Wenatchee, Bellingham, Vancouver, and Bothell (Appendix 5). Two more Gender Revolution events have been announced for June 2017: Burlington on June 20th and Spokane on June 22nd.

However, the C4 reports filed by Just Want Privacy show no in-kind contributions from the Family Policy Institute of Washington for materials or meeting space despite that fact that Backholm and FPIW utilized these events as campaign events for Just Want Privacy's Initiative 1552 efforts (Appendix 6).

2. FPIW's COO and Policy Director Chris Plante sent out an email to the FPIW e-mail list on March 2, 2017 that touted the organization's involvement in the Just Want Privacy campaign (Appendix 1):

Family Policy Institute of Washington is happy to support the efforts to qualify Initiative 1552 for the ballot this November and see it passed by the voters of Washington. [...]

Among FPIW's efforts to help Just Want Privacy (JWP), the organization running the initiative, **FPIW is serving as a Regional Petition Center.** You may pick up blank petitions

for circulating and return gathered signatures to us. Our address is 16108 Ash Way, Suite 113 Lynnwood 98087. Our normal business hours are 8 – 5. [...]

3. Another email from Plante to the FPIW email list sent on June 14, 2017 promoted a FPIW [blog post](#) authored by Joseph Backholm that pushes readers to help with Just Want Privacy's campaign (Appendix 15).

There is [sic] only four weeks left to get the 330,000 signatures necessary to allow the voters to have a voice on this issue.

If you haven't signed the petition, click here to have a petition mailed to you , your friends, and family can sign the petition. Then click here to make a contribution.

4. Facebook photos from the FPIW Facebook page also clearly show that FPIW had a table for gathering signatures for Just Want Privacy at their 10th Annual Dinner event in Bellevue on April 28, 2017 (Appendix 2). None of those resources were declared as an in-kind contribution to the campaign from FPIW.
5. FPIW's Executive Director, Joseph Backholm, often issues his own statements, [videos](#) and appears in media on behalf of Just Want Privacy but none of his compensation from FPIW is declared in either organization's filings.

National Organizations Also Making Unreported In-Kind Contributions to Just Want Privacy

In an [interview on January 31, 2017](#), Just Want Privacy Communications Director Kaeley Triller Haver told talk radio show Eyes on Washington that the campaign was receiving support from national organizations (Appendix 7, 33:50min mark):

“Then even from a national perspective we have a lot of support from the obvious allies here: the Alliance Defending Freedom and Family Policy Council, things like that.”

The Family Policy Institute of Washington lists both the Alliance Defending Freedom and the Family Research Council as national organizations that partner with their group on the “[Associations](#)” page of the FPIW website (Appendix 8). Just Want Privacy also touts Alliance Defending Freedom's support such as on their [Signature Sunday webpage](#) (“Can Churches Legally Participate? Absolutely! Letter from Alliance Defending Freedom)

On June 8, 2017, the Alliance Defending Freedom [produced and broadcasted a podcast](#) with Just Want Privacy's staff about I-1552 (Appendix 9). None of the costs were accounted for in financial filings.

However, none of the C4 reports from Just Want Privacy show any in-kind or cash contributions from these national organizations.

Other Missing In-Kinds From Supporters

1. According to a Facebook post from May 23, 2017, Just Want Privacy received office space and office equipment for petition processing from **former Rep. Graham Hunt** (Appendix 10). None of this support has been accounted for in financial filings from either former

Rep. Hunt nor Just Want Privacy.

2. On May 19, 2017, Tadd Bentson of Bentson Printing provided the use of a commercial scanner to the Just Want Privacy campaign for scanning petition sheets (Appendix 11). None of this support has been accounted for in financial filings.
3. On May 16, 2017, Just Want Privacy posted photos on Facebook of volunteers doing data entry for the initiative in what is clearly an office space (Appendix 12). None of this support has been accounted for in financial filings.
4. On May 8, 2017, Just Want Privacy made an appeal for volunteers in their office in Tacoma (Appendix 13), however none of this office space has been accounted for in financial filings.
5. On June 2, 2017, Just Want Privacy made an appeal for volunteers to help process petitions in a location in Lynnwood (Appendix 14), however none of this office space has been accounted for in financial filings.

Conclusion

Just Want Privacy has been receiving significant resources in the form of email blasts, blog posts, staff time, office space and organizational support for their initiative efforts that have gone unreported in their financial filings. This lack of transparency with the public is troublesome and the campaign should remedy these discrepancies immediately and be sanctioned by the PDC accordingly.

Appendices

Appendix 1:

Family Policy Institute of Washington, "Get Privacy Petitions At FPIW", e-mail sent March 3, 2017

Appendix 2:

Family Policy Institute of Washington Facebook Photo Album, "FPIW Annual Dinner 2017 – Celebrating 10 Years!", Photo #2, posted April 28, 2017:

<https://www.facebook.com/FamilyPolicy/photos/a.10155226919918688.1073741829.160152163687/10155226919993688/?type=3&theater>

Appendix 3:

Southern Poverty Law Center, "Washington Anti-LGBT Seminars Begin Organizing For Another 'Bathroom Bill' Initiative, April 24, 2017,

<https://www.splcenter.org/hatewatch/2017/04/24/washington-anti-lgbt-seminars-begin-organizing-another-bathroom-bill-initiative>

Appendix 4:

Joseph Backholm at Kitsap Patriots Tea Party, YouTube, uploaded April 24, 2017, 11:00 minute mark, <https://www.youtube.com/watch?v=LGJbtldmmfU&feature=youtu.be&t=660>

Appendix 5:

Family Policy Institute of Washington Facebook Events Page, Gender Revolution Events, April 3, 2017 – May 8, 2017, <https://www.facebook.com/pg/FamilyPolicy/events/>

Appendix 6:

Just Want Privacy, April C4, filed May 10, 2017

Appendix 7:

Eyes On Washington, Interview With Kaeley Triller Haver, January 31, 2017, 33:50 minute mark, http://www.eyesonwashingtonmedia.com/?page_id=394

Appendix 8:

Family Policy Institute of Washington Website, “Associations” Page, National Organizations, accessed May 20, 2017, <http://www.fpiw.org/associations/>

Appendix 9:

Alliance Defending Freedom Podcast, “An Initiative for Common Sense in Washington”, June 7, 2017, <https://soundcloud.com/freedommatters/an-initiative-for-common-sense-in-washington>

Appendix 10:

Just Want Privacy Supporter Facebook Post, May 23, 2017.

Appendix 11:

Just Want Privacy Supporter Facebook Post, May 19, 2017.

Appendix 12:

Just Want Privacy Supporter Facebook Post, May 16, 2017.

Appendix 13:

Just Want Privacy Supporter Facebook Post, May 8, 2017.

Appendix 14:

Just Want Privacy Supporter Facebook Post, June 2, 2017.

Appendix 15:

Family Policy Institute of Washington email, June 14, 2017