

Station Managers
Sally Culling for Ohio's Advertisement

Re: Sally Culling for Ohio's False, Misleading, and Deceptive Advertisement

Dear Station Managers:

On behalf of Haraz Ghanbari it has come to my attention that Sally Culling for Ohio has purchased time on your station to air a false, misleading, and deceptive advertisement. A British national, Ms. Culling is an expert in shipping Ohio jobs overseas, investing in morally reprehensible businesses, and serving on local city councils in England. She should apologize for airing this false, misleading, and deceptive advertisement.

The advertisement run by British citizen Sally Culling is aired in violation of O.R.C. 2917.32(A)(1) and is false, misleading, and deceptive. Under this provision, no person, including Sally Culling, may "Initiate or circulate a report or warning of an alleged or impending fire, explosion, crime, or other catastrophe, knowing that the report or warning is false and likely to cause public inconvenience or alarm." As presented, Ms. Culling's ad boldly states the message is a warning to the public, and is presented in a manner of announcements from the Emergency Management System. Ms. Culling is not allowed to use the broadcast air waves in violation of Ohio law.

In addition, with respect to broadcast licensees, we understand your station has broad latitude to run political advertisements and is required to air this advertisement. As the Supreme Court has determined, "debate on public issues should be uninhibited, robust, and wide-open, and that it may well include vehement, caustic, and sometimes unpleasantly sharp attacks on government and public officials." See *N.Y. Times v. Sullivan*, 376 U.S. 254, 270 (1964). We understand the benefit of robust political discourse, but advertisements that are false, misleading, and deceptive have no place in politics. Although your station is immune from liability, we thought it important to inform you of these false and unsupported claims.

In addition to being in violation of the Ohio Code, this advertisement is demonstrably false, misleading, and deceptive as set forth below:

False Claim 1: Haraz Ghanbari is a "corrupt candidate."

False Claim 2: Haraz Ghanbari is "responsible for the most corrupt scandal in Ohio's history."

False Claim: Haraz Ghanbari “lines his pockets with money from special interests.”

This advertisement provides zero support for any of these false claims. In fact, Mr. Ghanbari has dedicated his life to serving others and has more than two decades of military service.

Mr. Ghanbari is an Eagle Scout, a member of the Iraq and Afghanistan Veterans of America, the American Legion, and a lifetime member of the VFW and the Military Officer Association of America. He and his family are members of CedarCreek Church.

He is a Navy veteran of Operation Enduring Freedom in Afghanistan and Operation Inherent Resolve, and an Army veteran of Operation Joint Forge in Bosnia. Promoted to Lieutenant Commander on Sept. 1, 2018, he currently continues his service in the United States Navy Reserve.

As the son of an immigrant from Iran, said his parents' courage and desire to have their children born here inspired him from a young age. Mr. Ghanbari earned a Bachelor of Science degree in Visual Journalism from Kent State, graduating Cum Laude, and went on to graduate with distinction from the United States Naval War College's Command and Staff Program. In 2019, Mr. Ghanbari earned his master's degree from the University of Toledo.

Previously, Mr. Ghanbari served as the Director of Military and Veteran Affairs for The University of Toledo. His commitment to service members, veterans and their families was underscored in November 2018 when he was inducted into the Ohio Veterans Hall of Fame as

In addition to the false claims noted above, we do not believe the disclaimer is in compliance with Ohio Revised Code Section 3517.20. The disclaimer on this advertisement is not clearly readable on the screen and as reproduced on internet-accessible devices as required by the statute, and this advertisement should be removed until a clearly readable disclaimer can be applied.

Thank you for your consideration of this request, and we are sorry that Ms. Culling has put you in this position with her false, misleading, and deceptive advertisement. We ask that your station remove this advertisement until these code violations have been corrected.

An Important Message Script	Facts
TOS: “Unendorsed by Ohio GOP”	The Ohio GOP opted to not consider Rep. Ghanbari’s endorsement, therefore the use of “unendorsed” is not accurate and not factual as it implies an endorsement was made and subsequently rescinded. (Ohio Republican State Central Committee Meeting 1/27/24)
Audio: “An important message. “	No Dispute.
Audio: “Haraz Ghanbari is responsible for the most corrupt scandal in Ohio’s history.”	The word “Responsible” indicates Rep. Ghanbari’s vote single-handedly caused the most corrupt scandal. In fact, the legislative process includes a majority of votes in both Chambers (House and Senate) as well as the signature from the Governor, in order for a bill to become law.
Audio: “And Haraz lines his pockets with money from special interests.”	Political contributions are not personal in nature and not for personal gain. The statement is that these funds are going to Rep. Ghanbari’s personal accounts are false and misleading, as they are donations by advocates to a campaign committee.
Audio: “My name is Sally Culling and I’m running for Statehouse. I believe in empowering parents, reducing your taxes, and keeping government out of our lives. As your representative, I promise to always put you first.”	No Dispute.