

Iglitzin (Thu, 7 Feb 2019 at 9:02 AM)

Dear Mx. Blackhorn:

Thank you for your inquiry regarding the above-referenced Complaint. For the following reasons, we ask that the Complaint be dismissed.

First, although Ms. Hopkins did register as a lobbyist with the PDC in 2016 (specifically, on February 10, 2016), Ms. Hopkins did not, subsequent to that date, in fact engage in any lobbying that she was required to report to the PDC. Instead, she was at all times exempt from the registration obligation under RCW 42.17A.600 by virtue of RCW 42.17A.610(5) (i.e., Ms. Hopkins restricted her lobbying activity to no more than four days or parts of four days during any three-month period and also did not meet the expenditure threshold set forth in that provision), and therefore was not required to file the reports provided for in RCW 42.17A.630. See WAC 390-20-018.

Second, Ms. Hopkins *did* provide a recent photograph of herself on the date she registered as a lobbyist in 2016. That photograph sufficed to meet the requirements of the law through the beginning of 2017, when Ms. Hopkins' registration terminated. When Ame Esterline, the Operations Manager for the Alliance for Gun Responsibility, took steps to "re-register" Ms. Hopkins as a lobbyist at the beginning of this year (on or about January 24, 2019), she had some challenges with the PDC's online functionality, which resulted (as we understand it) in Mr. Hopkins' old photograph remaining on the system until February 5, 2019, on which date Ms. Esterline managed to upload a new photo, which has been in the PDC's possession since that date. The new photo was taken on January 21, 2019, and therefore satisfies the recency requirement of WAC 390-20-013.

In light of the above, there is clearly no merit to the substantive portion of Mr. Morgan's Complaint (i.e., that Ms. Hopkins has wrongfully failed to file L-2 forms), and the technical violation he alleges (the absence of a "recent photograph" at the time of registration) is, at the absolute most, a de minimis mistake that was remedied within less than two weeks of the error. For these reasons, we ask that the Complaint be dismissed in its entirety.

Sincerely,

Dmitri Iglitzin
Counsel for the Alliance for Gun Responsibility