

December 2, 2022

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504

Dear Public Disclosure Commission –

Thank you for the opportunity to respond to the multiple complaints filed by William Bangs (case #114358, #114357, #113965, and #114206).

Because these four complaints all center around the same issues involving the Top 5 listing on our political communications and are submitted by the same complainant, I am combining the responses into one correspondence.

The first complaint Mr. Bangs filed (#113965) related to the Top 5 listing on our mailer. At the time the mailer was sent to the printer (Oct 7th) and they were produced during a process called “gang run” which is a process where all mail pieces are printed together to save on printing costs; however, they are mailed on separate dates. Because the donation that Mr. Bangs mentioned were received AFTER the mailer was printed (Oct 21), the Top 5 listing would be correct. There would not have been anyway for us to practically update the Top 5 listing after it was already printed. Our consultants, Moxie Media, have confirmed this was in fact the case and the timing of the printing preceded the donation that would have affected the Top5 contributor listing.

For the remaining three complaints, they are essentially the same issue – a snapshot in time between when a website was updated and when a contribution was received and then reported. Additionally, FairVote Washington will be inking some work on behalf of these committees so we thought it more transparent to include them in the Top 5 should the committees not raise enough money to reimburse FairVote Washington for work performed on behalf of the committees. If the PDC thinks it better to not include those types of inkings as part of the Top 5 listing, we will adhere to that advice going forward. It is not accurate to say that we purposely concealed FairVote Action in the Top 5 listing. In fact, each donation was timely and accurately reported on our PDC forms so that accusation is clearly false. There could have been a lag between receiving a contribution and updating an original Top 5 listing on a website due to whirl of the final weeks of before election day. We believe that is a very minor oversight and kindly ask the PDC to consider dismissing all four complaints.

Thank you for the opportunity to respond to the complaints. If you have any questions, please feel free to contact me directly at 206.745.2010 or info@argo.us.

Sincerely,

Jason Bennett, Treasurer
Ranked Choice Voting for Seattle
Ranked Choice Voting for Clark CountyRanked Choice Voting for San Juan County