Dear Jordan,

As best I can tell, this complaint #163176 is the same as complaint #159777, that was disposed of in a letter from you on October 11. If I am missing a nuance between the two complaints, please advise.

Our committee treasurer filed monthly reports in 2024. We originated a tranche of contributions totally \$8,900 on July 2, to candidates all or the majority of whom probably appeared on the primary ballot. We appear to have missed the July 16th special reporting, but reported these contributions on the August monthly report, as observed in the resolution to #159777.

We made one additional contribution of \$600 on October 16th, but that candidate (a sitting Senator) was not on this year's general election ballot, so no special pre-general report was made, and that contribution was reported in the monthly C4 in November.

One difficulty we've observed is that our treasurer reports the C4s as prompted (and prepopulated) in the ORCA system's C4 area, but this does not include special pre-primary or pre-general election reports. Having now been made aware of the requirement to timely report pre-primary and pre-general contributions if they fall within the time periods and scope of the requirement, she relates that she does not know how to do it within the structure of the ORCA platform.

Accordingly, we've encouraged her to arrange for training with PDC staff to simply learn how to do this in a compliant way should the issue requirement be triggered in the future. We are a tiny committee comparatively, and generally contribute no more than \$10,000 in the aggregate in any given calendar year. Our treasurer is a volunteer.

As you can see, we are being totally transparent and in good faith about our desire and willingness to comply with the reporting laws of the state and have an action plan in place to obtain the training necessary to make these reports when and if they are required.

We would ask you to dismiss #163176 on the same basis as #159777, and on the basis of the explanation provided above. If it would be helpful to file amended or new reports that relate back to the 7/1-7/15 period, please advise and we will accelerate the training engagement by our treasurer.

Feel free to contact me here if you have any additional questions.

Very truly yours,

Kris Tefft

**Executive Director** 

Washington Self-Insurers Association

(for the WSIA Legislative Fund Committee)