

August 23, 2022

Public Disclosure Commission
PO Box 40908
Olympia WA 98504

Dear Public Disclosure Commission –

Thank you for the opportunity to comment on the proposed legislation and the upcoming PDC meeting. I am sorry I will not be able to attend live but I will be out of the country during the upcoming meeting. I did have a very productive meeting with both Kim Bradford and Sean Flynn recently in anticipation of the proposed legislation. I appreciated the conversation and think this was a good conversation on a couple of key items that are of important to professional political folks.

I did want to summarize my points during the conversation for the full Commission where we found some common ground and highlight a few pieces that I believe need further discussion, likely with more stakeholders.

1. I am generally supportive of re-adjusting the reporting periods to reduce what has essentially become a 5-week span of non-reporting for expenses in June, over the primary in late July through August, and then again in September through early October. I am opposed to the initial proposal to institute weekly C4 reporting periods and have testified previously against that suggestion. It is far too burdensome and I believe would result in erroneous or late filings as the pace of campaigns and invoicing will not match weekly reporting requirements. It has been suggested that we instead institute two additional reporting periods – one pre-primary and one pre-general C4 to add an extra set of expense reporting.

Generally, I am supportive of this suggestion, depending on what is decided as the reporting periods and deadlines for each pre-election report. For example, there were 61 days between June 1 and August 1. If we were requiring three C4 reports in this period instead of two, it would be ideal to have them due every other week. I understand there might be statutory limitations to this idea but I am mostly highlighting what would be a more streamlined, preferred reporting cycle if we were to add a reporting period pre-primary.

2. It has also been recommended that we consider streamlining other reporting periods so that there is one reporting cycle for all types of campaigns – judicial campaigns, ballot measures, surplus funds accounts and off-cycle candidates. Currently, candidates who are not on the primary ballot have their own reporting deadlines and periods different than candidates who are. It would be great if we could streamline these various

reporting periods so we have one deadline for all of our clients.

3. I am supportive of the other recommendations generally in the proposed legislation – and am thankful for the recent work by the PDC on increased LMC thresholds and the suggestion to give treasurers 48 hours to file pre-election reports. Thank you for hearing our concerns on these items and taking action.

4. One area of concern I do have is around the issue of added transparency on digital advertising. I know this is an ongoing issue and do generally support the call for increased disclosure. I will state as a treasurer that it is incredibly difficult to get accurate real time data from vendors on digital advertising. I think it would be very important to ensure that this discussion continues to include working with digital advertising firms, digital advertising platforms, consultants, and treasurers to discuss a way that we can increase transparency here in real time. As a treasurer, I would be very curious to know the level of detail a general consultant or a digital advertising firm could reasonably receive from a particular platform and how willing these platforms are to provide further detail. I can tell you from firsthand experience, I do not receive much more than the number of impressions, the run dates, the amounts, and the types of ads run. And that is already after a lot of encouragement to provide that detail. I believe that if we do not get buy in from the other stakeholders involved in digital advertising, instituting any new level of detail here is setting treasurers and candidate campaigns up for complaint and possible fine.

Thank you for the opportunity to provide some feedback in preparation of the meeting. Again, I am sorry I won't be able to make it in person.

Sincerely,

Jason Bennett
Argo Strategies