

Please find below our response to the complaint:

Response to Complaint

The campaign has reviewed the concerns raised in this complaint and, out of an abundance of caution, has amended the applicable C-4 reports to include the text messaging expenditures identified by the complainant, as well as other similarly situated expenditures that had been reported using the same methodology, including digital advertising reported as estimated impressions. The complaint alleges that certain mass texting expenditures were not disclosed in a timely manner.

At the time the reports were filed, the campaign had not yet received invoices for the text messaging services or certain social media advertising. The amounts reported were therefore good-faith estimates based on the information available at the time. This methodology was applied consistently and was not unique to the text messaging services identified in the complaint.

Because final invoices have not yet been received, the reported amounts remain estimates and may require further amendment once actual billing is available. Moving forward, the campaign will report these expenditures on an accrual basis when the services are incurred, rather than waiting for an invoice or payment, to provide greater transparency and more timely disclosure.

There was no intent to withhold information or reduce transparency. The campaign acted promptly to amend the reports, add additional similarly situated expenditures, and clarify the nature of the reported costs. The campaign will continue to amend its reports as necessary when final invoices are received and remains committed to full compliance with Washington's campaign finance reporting requirements.

Thank you for your Guidance on this matter.