

**Gerry Austin**

Replied March 15, 2021

To: "PDC Support" <pdcc@pdc.wa.gov>

Cc: barbara.sandahl@pdc.wa.gov

To Whom it may concern,

SKSS hereby submits its response to complaint #85715 against South Kitsap School Supporters filed by Mr. Robert Parker.

Allegation one: Failure to timely and accurately report and fully describe expenditures on C-4 reports (eg Web design and hosting services, digital ads, and processing fees)

a) Web design and hosting services.

a. SKSS disclosed expenditures for website domain and wordpress subscriptions dated 12/23/2019 in the amount of \$51.80 for google domains and \$104.64 for Wordpress subscriptions. These subscriptions were purchased for a 2 year period, expiring 12/23/2021 under the registered SKSS 2020 campaign. This is noted on page 2 of the C4 report filed for the period from 12/01/2019 to 12/31/2019 as "Wordpress subscription through 2021" and "Google domain registrations through 2021"

b. SKSS disclosed expenditures for "Consulting Services" with Engage Campaigns on the C4 report covering the period of 12/01/2020 to 1/09/2021. As part of the contract for these services, Engage Campaigns agreed to "Develop and maintain the campaign website". SKSS incurred no additional expense beyond the contracted amount for consulting services.

b) Digital Ads

a. Expenses for digital ads were reported in the amount of \$420.00 on 3/02/2021 on the C4 report filed covering the period of 03/01/2021 to 3/02/2021, which were paid upon being invoiced by Engage Campaigns on 2/25/2021. Engage invoiced SKSS upon being billed by Google. Google ads do not charge a set amount up front because they don't know how many people are going to be reached, and the fee structure is based on that. No debt was incurred prior to this invoice and payment.

c) Processing Fees

a. SKSS reported the net donations received via Paypal totaling \$823.25 between 12/29/2020 and 2/1/2021 on C3 forms. Paypal collected a total of \$26.75 in processing fees from these transactions. Upon further research, SKSS acknowledges these fees were not properly reported and that the total donation amount, prior to processing by Paypal, should have been reported on the C3 form, and subsequent processing fees should have been reported on the C4 forms. As such, SKSS has amended its filings. SKSS thanks Mr. Robert Parker and the PDC for bringing this to our attention as SKSS strives to fully comply with requirements to ensure complete transparency and disclosure.

Allegation two:

a) Failure to identify sponsor of digital advertising.

a. The small online ads in question are conspicuously linked to the campaign webpage, [voteskschools.com](http://voteskschools.com), which can be reached with one mouse click, and which contains the following statement at the bottom of the landing page, which contains the disclaimer, as required by the PDC advertising brochure:

Paid for by South Kitsap School Supporters  
PO Box 2081  
Port Orchard, WA 98366

This was verified on two separate desktop browsers (Edge and Chrome) and one mobile browser (Safari). Without knowing additional detail as to the method in which Mr. Parker accessed the page, SKSS disputes Mr. Parkers claim that "you must click through the website" to find sponsor information.

The ads in question were sized no smaller than a 200 x 200 pixel square, and no larger than a 336 x 280 pixel rectangle, and are consistent with other 'small online ads' which have been similarly used by other campaigns.

Sincerely,  
Gerry Austin  
SKSS Treasurer