

To whom it may concern:

I write in response to the complaint filed via the portal by Conner Edwards on or about November 5, 2024. I write in my capacity as the Treasurer for the Washington Association of Vehicle Subagents ('WAVS'), a non-profit, non-partisan industry association for owners of vehicle licensing subagencies of the DOL. We are small business owners and leadership roles in our organization are made up of volunteers.

Approximately one year ago, the person previously responsible for PDC reporting left the organization abruptly and I worked toward learning how to comply with the PDC rules and regulations. I watched webinars/training events by PDC and read as much as I could find on the website, but it seemed much of what I learned was for organizations far more complex than ours. We reported in a fashion we believed to be compliant based on our review of our organization's prior reporting.

Eventually, but not initially, we were able to locate the reporting calendar posted on the PDC website. After finding this helpful resource, we modified our internal process and hope that we are now following the requirements precisely. Our process now is to report all income and expenditures when received or dispersed, respectively, and file a monthly and annual report as described at the calendar link above.

With respect to the allegations that expenditures to Marian Dacca Public Affairs LLC appear not to have disclosed 'subvendors' as required by WAC 390-16-205, we do not understand this allegation and request further specificity if it is legitimate. The categories applicable to this vendor include (1) consulting fees and (2) various small travel reimbursements, such as 'mileage reimbursement' 'hotel reimbursement,' and general 'travel reimbursement.' Is it the complainant's allegation that the brand of hotel needs to be disclosed to protect public interest? We are unclear how we have failed to comply with the WAC. We strive for compliance and welcome further instruction in this respect.

Our apologies for our initial delays in reporting – our reported content was precise and accurate, but we did not then understand the monthly timelines.

We trust that this resolves the concerns brought forward. Please notify us in the event there are additional needs.

Sincerely,

Washington Association of Vehicle Subagents