

March 14, 2025

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504

Dear Public Disclosure Commission –

Thank you for the opportunity to respond to the complaint filed on January 30, 2025 by Conner Edwards (case #166185).

Tobacco-Free Kids Action Fund, the sponsor of the ads in question, retained Argo Strategies in February to bring their grassroots lobbying reporting into compliance. After email and phone call exchanges with the PDC to obtain guidance on how to ensure proper and accurate reporting, the registration and first month L6 report was filed on March 11, 2025. Per guidance from the PDC, subsequent monthly reports will detail grassroots lobbying expenses on the monthly L2 report of one of our lobbyists, Andrew Estep, since the ads are paid 100% out of existing general treasury funds.

We appreciate the conversations and assistance the staff of the Public Disclosure Commission provided not only to Argo Strategies but also those associated with Tobacco-Free Kids Action Fund. I understand this new reporting for grassroots lobbying is a little more than a year old and I am sure there is a lot of confusion about what is now required. Lobbyist employer organizations, like Tobacco-Free Kids Action Fund, are adjusting to this new requirement and we sincerely appreciate your working with us to bring the reporting to a current state.

Thank you for allowing us the opportunity to address this matter. Please feel free to contact me at any time with any questions or concerns.

Sincerely,

Jason Bennett, Assistant Treasurer
Tobacco-Free Kids Action Fund