

## Palattao Burnes Strategies

replied (Wed, 2 Jul 2025 at 9:04 PM)

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

External Email

Hi Tabitha,

Thank you for your call the other day, and my apologies for the delay. Please find below the information you requested regarding Complaint #172945.

**Subject:** Response to Complaint #172945

I appreciate the opportunity to explain the circumstances that led to the late L-2 filings noted in the complaint. I value Washington State's commitment to transparency and take full responsibility for the reporting delays. Below is a detailed account of the relevant timeline and corrective measures I've implemented.

### **2022: Launch Year – Building Systems and Learning Compliance Requirements**

I launched Palattao Burnes Strategies in late 2021. As a new firm, I was navigating several start-up challenges:

- **Learning a new reporting system:** I was filing lobbyist disclosure reports for the first time and learning the technical and procedural requirements of the PDC's electronic reporting platform.
- **Rapid client onboarding:** Several clients retained services mid-month, often with incomplete contract documentation. To avoid submitting inaccurate or incomplete disclosures, I occasionally delayed filings to ensure that final details were correct before submission.
- **Prioritizing accuracy:** When faced with a choice between submitting an incomplete report on time or a complete report slightly late, I chose to delay and later amend as needed. This approach resulted in a few late filings in 2022, but helped establish a more accurate and reliable reporting process.

### **2024: Confusion Around Filing Responsibilities Led to Delays**

In early 2024, I began working with a client who had an existing relationship with another government affairs consultant but was not a registered lobbyist. There was initial confusion about who was responsible for filing reports, as well as confusion about which client profile to register with. That confusion was not resolved until later in the year, but was caught very quickly after reportable activities occurred. As a result:

- **L-2 and L-3 misalignment occurred:** As soon as I became aware there was an issue with our filings, I worked to backfill reports and ensure that my L-2 filings aligned with the client's L-3 filings.
- **No activity was omitted:** All expenditures and lobbying contacts were filed and are now publicly available. The delays stemmed from correcting and syncing historical records—not from concealing activity.

- **April 4, 2025 batch filing:** A large set of amended and original L-2s were submitted on this date to align with the client's corrected L-3s. These account for the bulk of the longest delays noted in the complaint.

This was an isolated situation. Since that time, I've implemented new onboarding practices to ensure all new clients understand our respective reporting responsibilities from the outset.

### **Status and Preventive Measures**

All L-2 reports are now current. To prevent future issues, I have adopted the following compliance measures:

- **Automated calendar reminders** at 10, 7, and 3 days before deadlines.
- **Part-time bookkeeper** support to validate and categorize expenses ahead of submission.
- **Lobbying compliance software** that prevents submission of reports with incomplete data.
- **Continuing education**, including completion of the PDC's "Lobbyist Filing Basics" webinar in Spring 2025.
- **Client intake checklist** requiring disclosure history confirmation before contract work begins.

### **Commitment to Compliance**

Transparency is foundational to my firm's work. I regret the late filings and appreciate the Commission's understanding as I corrected internal processes and addressed a breakdown in client reporting coordination. With these updated systems in place, I am confident that future reports will be accurate and submitted on time.

Thank you again for your consideration and assistance with resolving this issue.

Warmest regards,  
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