

Written comment on proposed disclosure rule changes

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

Hello, PDC rules writers,

Last week we at 350 Seattle and 350 Seattle Action Voters were horrified (and I don't use this word lightly) to learn of the proposed rule changes for grass roots lobbying.

We set up a very small PAC for this year's elections, and as treasurer of that entity, I found that PDC reporting requirements effectively silenced our electoral speech. Instead of organizing folks to get out the vote to elect climate champions, I spent literally hundreds of hours learning the rules, tracking independent expenditures and contributions, and reporting. If my time had been paid at professional rates, it would have eaten up all the money we raised and then some.

PDC is planning to institute similar reporting requirements for grassroots lobbying. I can only surmise that moneyed interests who can afford lobbyists, lawyers, and accountants are behind this move, because for volunteer, people-powered, organizations like ours, it will be the death knell of our ability to organize folks to speak to their legislatures on critical issues like climate justice.

Please reconsider these changes, or if they are made, please raise the monetary and time thresholds so that grass roots organizations raising a few paltry thousands don't have to do similar reporting to organizations that spend tens of millions of dollars. Based on my experience with similar reporting for campaign committees, these new weekly reporting requirements would require us to hire staff, and in the likely event that we couldn't afford that, our speech to the legislature would be effectively silenced.

I know it's not PDC's intent to stifle political speech for some but not for all, but that will be the effect of this legislation for our organization.

Yours in favor of democracy and free speech,

Alice Lockhart
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