

March 21 2023

Comments on APA petition regarding employer name and address data

External Email

Honorable Commissioners:

I am writing to encourage you to consider and act on the petition under the Administrative Procedures Act from Conner Edwards regarding discontinuing the collection of employer address information for contributors to political campaigns.

I concur with and support all the arguments Mr. Edwards makes in his petition. In my experience, it can be difficult for contributors to know what to state as their employer location. Many people in our area work for multinational corporations whose headquarters may be in another state or country. Many employers have multiple local offices. Many employees work from home (including me). Should they declare the location where they work, one of the local locations of their company, or its headquarters location? The best solution would be to not collect the data at all, as Mr. Edwards suggests, but at the very least specific guidance is needed.

I also believe some clarification is needed for contributors who have multiple employers. Because I serve in elected office, there have been many occasions in my life when I have had multiple employers, such as both Microsoft and the City of Kirkland. I also run my own licensed small business. The C-3 form allows reporting of only a single employer. Which should I report? Does it matter? Should I report whichever relationship generates the majority or plurality of my income? The one that is most politically active? The one that's most controversial? The one that is a potential conflict of interest? The one in which I have the highest level position? How is a contributor or a treasurer supposed to know? In today's gig economy, many people have multiple employers. Does a campaign get in trouble for reporting the wrong employer, whether based on the donor-provided information or based on looking up previous donations in the PDC database? I assume the purpose for collecting employer name information is for the public to be able to deduce, correctly or incorrectly, any coordinated effort for the officers or employees of a company to support a particular candidate or ballot measure, but as with the location information, some guidance is needed for contributors and treasurers to deal with situations where a person has more than one employer.

My comment today is on my own behalf and not on behalf of any organization, governmental entity, or employer.

Thanks very much for your consideration.

Toby Nixon  
12113 NE 141st St  
Kirkland WA 98034-1411  
(206) 790-6377