



December 10, 2018

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504

Dear Public Disclosure Commission:

Thank you for the opportunity to respond to the recent complaint (#42719) filed by Mr. Glen Morgan and for the opportunity to discuss this issue with PDC Compliance Officer Kurt Young at our recent December 3rd meeting in Olympia. As requested during the meeting, we are submitting additional information for your consideration.

In March of this year, Argo Strategies was retained to assist UFCW 21 PAC in conducting a thorough evaluation of not only compliance filings but also the status of their books of account after it was discovered by senior UFCW 21 staff that there was a breakdown in their internal system of compliance reporting for their PAC's 2017 activity. Upon discovery, UFCW 21 PAC took immediate action, including personnel action, and decided that in order to ensure that there would be no similar compliance errors in the future, the work of compliance would be outsourced to Argo Strategies. Thereafter, collectively, Argo Strategies and UFCW 21 PAC began the process of performing an internal audit and bringing the account into current filing status for the 2018 cycle.

We first conducted a desktop audit of the current filing period (CY 2018) and brought those accounts into current status. Then, we began the process of piecing together the CY 2017 reporting file and reconciling the accounts so that the bank statements and the ORCA file matched to the penny. After that process was completed, we proactively filed each of the required reports in August 2018, two months before Mr. Morgan's complaint. The PAC acted in good faith when it identified an issue and acted promptly to fix the issue as quickly as possible.

UFCW 21 PAC has not had previous violations with the PDC. Since Argo has been retained, the 2018 PAC reports have been filed timely and accurately as well. It is our hope that the Commission will see that this was an isolated incident and recognize that UFCW 21 PAC has worked proactively to bring the PAC into full compliance. Finally, I have appreciated my close working relationship with the PDC and hope that my own efforts to communicate proactively when issues arise and seek guidance from the PDC consistently will be considered as this moves forward.

We appreciate the willingness of the Public Disclosure Commission to consider these factors when entering into a stipulation agreement with the PAC.

If you need any additional information or have any questions, please do not hesitate to contact me directly at jason@argo.us or 206.486.0085.

Sincerely,

Jason Bennett, Treasurer
UFCW 21 PAC

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