BRUSHWORKS · TRANSPARENCY REPORT · LAUNCH EDITION · SEPTEMBER 2026

Transparency report.

What the firm registers, discloses, declines, receives and resolves

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The reporting standard, the counting rules, the state of the firm at launch, how the concerns, rights-request, incident and government-request channels work, the declination policy, and where every figure can be checked.

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Contents

Section 1 Purpose and period

Section 2 The state at launch

Section 3 Definitions and counting rules

Section 4 How the channels work

Section 5 The declination policy, for reference

Section 6 How to verify

Appendix A The first period report, template

Section 1

Purpose and period

Twice a year the firm publishes what it registered, disclosed, declined, received and resolved — in aggregate, defined the same way each time, so that the figures can be compared across periods and checked against public registries where they exist. This launch edition fixes the definitions and the counting rules and records the firm's state at launch, so that the first period report can be read against a standard set before the numbers existed.

EDITION	PERIOD	PUBLISHED
Launch edition	State at launch, September 18, 2026	September 2026
First period	September 18 – December 31, 2026	January 2027
Second period	January 1 – June 30, 2027	July 2027; combined in the annual report

1.1 Who signs

The compliance lead compiles the figures from the registers named in Section 3; the data protection lead compiles rights-request and incident figures; counsel of record reviews registrations and concerns; the chief executive signs the report to the board. The independent reviewer samples the underlying registers annually.

Section 2

The state at launch

CATEGORY	AT LAUNCH	NOTE
FARA and LDA registrations active	As applicable	Reported by count and jurisdiction from the first period; any registration required by a mandate is filed before activity and listed here
Foreign-influence and third-party registrations abroad	As applicable	By jurisdiction from the first period
Programs on air	—	Reported by practice from the first period; never by client
Wall certification	In force	Certified for the current cycle by counsel; no exceptions
Concerns received	0	The concerns@ channel opened at launch
Incidents	0	No security, compliance or operational incident recorded
Rights requests	0	The privacy@ channel opened at launch; the site's privacy-choices panel records opt-outs on the visitor's device and never sends them to the firm
Government and law-enforcement requests	0	See Section 5

CATEGORY	AT LAUNCH	NOTE
Models retired	See kill-log summary	Representative proportions until the audited year

Section 3

Definitions and counting rules

REPORTED	DEFINITION	REGISTER OF RECORD	COUNTING RULE
Registrations	Filings under FARA, the LDA, FIRS, FITS, third-party regimes and transparency registers, active on the last day of the period	Registration register kept by the compliance lead	Counted by filing and jurisdiction; date of filing compared to date of first activity, with any gap reported
Disclaimers	Paid placements in the period carrying the required sponsor language; placements appearing in platform ad libraries	Compliance reviews; ad-library exports	Deficiencies are placements found without correct language, corrected or withdrawn, counted separately
Practice wall	Counsel's certification that candidate and independent-expenditure work were separated for the period	Wall certification	Any exception is reported with counsel's finding, anonymized
Mandates declined	Prospective engagements declined in writing under the declination policy	Acceptance-screen records	Counted by category: opposing sides of one contest; not describable in public; sanctioned party; violence or civil-rights denial; voter suppression; foreign influence on a U.S. election; undisclosed messengers or synthetic people; other
Concerns	Reports to concerns@ or to counsel from any person	Concerns log held by counsel	Received; acknowledged within two business days (share); investigated; substantiated; resolved; outstanding at period end; anonymous share
Incidents	Security, compliance or operational events meeting the incident-response runbook's definition	Incident log	Counted by class; clients notified within seventy-two hours (share); regulators notified (count)
Rights requests	Access, deletion, correction, portability, opt-out and appeal requests under any applicable law	privacy@ log	Received; answered within statutory time (share); refused with reason (count); Global Privacy Control signals are honored automatically and not counted as requests
Government requests	Requests from any government or law-enforcement body for program data	Legal-process log	Received; complied with under valid legal process; challenged; clients notified where lawful

Section 4

How the channels work

4.1 Concerns

Anyone — an employee, a contractor, a client's staff, a voter, a journalist — may write to concerns@brwrks.com or to counsel, anonymously if they wish. Receipt is acknowledged within two business days. Investigation is supervised by counsel of record, who may retain outside counsel; the reporter is answered in writing; retaliation against a reporter is a dismissal offence. Concerns about the chief executive go to the board through counsel. Aggregate counts appear here; nothing that could identify a reporter is published.

4.2 Rights requests

Requests to privacy@brwrks.com are verified proportionately to the sensitivity of the data, answered within the time the applicable law requires (forty-five days extendable once under U.S. state law; one month extendable under the GDPR and UK GDPR; thirty days in Canada), and logged. Authorized agents may submit with written authority. A refusal states its reason and the route of appeal. The firm holds program data for clients as a processor in most cases and forwards requests to the client where the law places the duty there, telling the requester it has done so.

4.3 Incidents

An incident is commanded under the runbook by a named lead with counsel engaged from the first hour. Clients whose data is affected are notified within seventy-two hours of confirmation; regulators are notified where the law requires; a post-incident review is completed within thirty days and reported to the board. Aggregate counts by class appear here.

4.4 Government and law-enforcement requests

The firm requires valid legal process, discloses only what the process specifies, notifies the affected client before disclosure unless legally prohibited, and challenges requests that are overbroad or that would require disclosure of a holdout assignment or a sealed list. Counts appear here by type; the firm has no arrangement with any government for routine access to program data.

Section 5

The declination policy, for reference

The firm declines in writing, and counts here, any mandate that would place it on opposing sides of the same contest; that cannot be described in public; that involves a sanctioned party or funds of unclear origin; that serves an organization advocating violence or the denial of civil rights; that has voter suppression as an object; that seeks foreign influence on a United States election; or that would require undisclosed messengers, synthetic depictions of real people, or targeting on identity. Declinations are recorded with their category and reported in aggregate.

Section 6

How to verify

FIGURE	WHERE A READER CAN CHECK IT
FARA registrations	The Department of Justice's public FARA registry (efile.fara.gov)
LDA registrations	House and Senate lobbying disclosure databases
UK FIRS and third-party registrations	The Home Office register; the Electoral Commission's register of non-party campaigners
Australian FITS registrations	The Attorney-General's Department's public register
Canadian third-party registrations	Elections Canada's registry
Disclaimers and ad-library presence	Platform ad libraries (Meta, Google, others), searchable by sponsor
Wall certification; concerns; incidents; rights requests	Available to clients and their counsel under agreement; the independent reviewer's letter confirms the registers were sampled

Appendix A

The first period report, template

CATEGORY	COUNT	DETAIL
Registrations active at period end	—	By regime and jurisdiction; filing-to-activity gap
Programs on air in period	—	By practice
Paid placements with disclaimers	—	Share of placements; deficiencies found and corrected
Wall certification	—	Issued; exceptions
Mandates declined	—	By category
Concerns	—	Received; acknowledged in time; substantiated; resolved; outstanding; anonymous share
Incidents	—	By class; clients notified in time; regulators notified
Rights requests	—	Received; answered in time; refused
Government requests	—	Received; complied; challenged
Models retired	—	Pointer to the kill-log summary

Transparency report, launch edition, September 2026. First period report: January 2027. Signed by the chief executive to the board; registers sampled annually by the independent reviewer.