

# TRANSPARENCY COMPLAINT - EUROPEAN CITIZENS' INITIATIVE

**Initiative:** Stop Destroying Videogames (Registration Number: ECI(2024)000007)

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## LEGAL BASIS FOR COMPLAINT

**Article 17 of Regulation (EU) 2019/788** requires ECI organizers to provide "clear, accurate and comprehensive information on the sources of funding for the initiative exceeding EUR 500 per sponsor."

The regulation specifically states: "The group of organisers shall provide, for the publication in the register and, where appropriate, on its campaign website, clear, accurate and comprehensive information on the sources of funding for the initiative exceeding EUR 500 per sponsor."

**Article 17(2)** grants citizens the explicit right to submit complaints regarding "the completeness and correctness of such information" through official Commission channels.

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## CURRENT VIOLATION

**1. False "No Funding" Declaration** The official ECI register at [citizens-initiative.europa.eu/initiatives/details/2024/000007\\_en](https://citizens-initiative.europa.eu/initiatives/details/2024/000007_en) currently displays **"No content available"** under "Sources of funding," indicating the organizers have declared zero funding sources.

**2. Systematic Concealment of Major Contribution** This declaration appears fundamentally incorrect based on publicly documented evidence of substantial undisclosed professional contributions to the campaign.

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## EVIDENCE OF UNDISCLOSED CONTRIBUTION

### Ross Scott's Public Statements:

- PC Gamer article (July 2025): **"There have been many weeks on the campaign where I've been working 12 to 14 hours a day to keep things moving to get signatures"**
- Scott's own admission: **"I've been running a rickshaw carrying people to the destination"**

- Multiple media interviews identifying Scott as handling "**the standard day-to-day work of running the Stop Killing Games initiative**"
- Scott described as the primary strategic decision-maker and public spokesperson throughout the campaign

#### **Conservative Professional Value Assessment:**

- **Intensive Periods:** "Many weeks" of 12-14 hours/day during critical campaign phases
- **Conservative Estimate:** 15-20 weeks at high intensity (12-14 hours/day) = 1,260-1,960 hours
- **Regular Campaign Work:** Additional ongoing daily campaign management throughout 12+ month period
- **Professional Rate:** €50-75/hour for campaign management/advocacy services (market rate)
- **Minimum Estimated Value:** €63,000-147,000 in professional contribution

#### **Additional Considerations:**

- This represents only documented intensive periods, not total campaign involvement
- Scott has managed strategic decisions, media relations, and operational leadership throughout
- **Even conservative calculations show contribution exceeding €500 threshold by 125-295 times**

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## **REGULATORY VIOLATIONS**

**1. Article 17 Disclosure Threshold Violation** The €500 disclosure threshold is exceeded by approximately **125-295 times** through Scott's undisclosed professional time contribution, representing potentially the largest single source of campaign support.

**2. Systematic Misrepresentation** Declaring "no content available" for funding while concealing substantial professional contributions violates the transparency framework designed to inform citizens about initiative backing and ensure democratic accountability.

**3. Foreign Contribution Concealment** Ross Scott is American, making this substantial undisclosed contribution a **foreign source** completely hidden from EU citizen evaluation of the initiative's backing and independence.

**4. Democratic Process Integrity** The concealment prevents informed citizen participation by misrepresenting the initiative as having no financial backing while substantially depending on foreign professional contributions.

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## **SUPPORTING DOCUMENTATION**

### **Publicly Available Evidence:**

- PC Gamer interview (July 2025) documenting Scott's intensive time commitment
- Multiple media articles consistently identifying Scott as campaign leader and primary spokesperson
- YouTube videos and public statements where Scott discusses operational control and strategic decisions
- Industry and media coverage treating Scott as the de facto leader despite formal EU organizer structure

### **Professional Standards Context:**

- Campaign management and advocacy services have established market rates in EU consulting markets
- 12-14 hours/day commitment during "many weeks" far exceeds any reasonable volunteer threshold
- Professional time investment constitutes quantifiable in-kind contribution under transparency regulations