



State of Washington
PUBLIC DISCLOSURE COMMISSION

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December 30, 2020

Sent electronically to Donald Britain at dwbritain@gmail.com

Subject: Complaint regarding We Want Accountability PAC, PDC Case 78959

Dear Mr. Britain:

The Public Disclosure Commission (PDC) has completed its review of the complaint filed on November 23, 2020. The complaint alleged that the We Want Accountability PAC, a 2020 Continuing Committee, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately report Monetary Contribution (C-3) and Summary Full Campaign Contribution and Expenditure (C-4) reports.

PDC staff reviewed your allegation(s); the applicable statute(s), rule(s), and reporting requirements; the C-3 and C-4 reports filed by the We Want Accountability PAC (Committee); and the December 2, 2020, response to the complaint provided by Charlotte Benjamin, Treasurer, on behalf of the Committee.

Based on staff's review, we found the following:

- On September 14, 2019, the We Want Accountability PAC filed a Committee Registration (C-1pc) report for 2020 as a Continuing Committee and selected the Full Reporting Option.

Alleged failure to file timely Monetary Contribution (C-3) and Summary Full Campaign Contribution and Expenditure (C-4) reports (RCW 42.17A.235 and .240).

- In its responses to this allegation, received on December 2, 2020, the Committee, by way of its treasurer, Charlotte Benjamin stated: "The reason why the last C3 was 8/17/20 was that's the last time the PAC received any contributions. Since I'm the treasurer for the PAC, the practice has been to not file any C3's unless there has been any contributions. Otherwise, any C3s filed wouldn't show anything. Also, since there wasn't any activity in September, there was no need to file a September monthly report. So in October, I combined the months of September and October into one report and filed because there was no activity in October."
- Staff noted that the Committee combined the report for September and October 2020 (09/01/20 – 10/31/20) and filed a single report for both months on November 1, 2020. The Committee was required to file the two separate reports required during the accelerated reporting period before the general election, and one after the general election as indicated below:

- The 21-Day Pre-General C-4 report covering the period beginning September 1 through October 13, 2020, was due no later than October 13, 2020 and was filed 64 days late.
 - The 7-Day Pre-General C-4 report covering the period beginning October 13 through October 26, 2020, was due no later than October 27, 2020 and was filed 50 days late.
 - The Post-General C-4 report covering the period beginning October 27 through November 30, 2020, was due no later than December 10, 2020 and was filed 6 days late.
- On December 16, 2020, the Committee amended the 21-Day Pre-General C-4 report and filed the 7-Day Pre-General and Post-General C-4 reports.

Based on these findings staff has determined that, in this instance, the Committee's failure to timely and accurately file the three reports mentioned supra, does not amount to a violation warranting further investigation. The Committee has no prior PDC violations and was prompt in taking correction action as soon as this complaint was brought to its attention.

However, the We Want Accountability PAC will receive a reminder letter concerning its failure to timely and accurately file three statutory reports during the accelerated reporting period, as required by RCW 42.17A.235 and .240. PDC staff expects that the Committee will file timely and accurate statutory reports in the future.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Erick Agina, Compliance Officer

s/ _____
Barbara Sandahl, Deputy Director for
Peter Lavalley, Executive Director

cc: Charlotte Benjamin, Treasurer – We Want Accountability PAC

