



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

January 15, 2021

Delivered electronically to Equal Opportunity PAC at “equalopac@gmail.com”

Subject: Complaint filed by Alex Bond, PDC Case 79577

Dear Equal Opportunity PAC:

Below is a copy of an electronic letter sent to Alex Bond concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Alex Bond, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of the timely and accurate disclosure of all campaign debts and expenditures, specifically including the detailed descriptions required on both C-4 and C-6 reports. PDC staff expects in the future that you will file timely and accurate C-4 and C-6 in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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January 15, 2021

Delivered electronically to Alex Bond at “alexjbond@gmail.com ”

Subject: Complaint regarding Equal Opportunity PAC, PDC Case 79577

Dear Alex Bond:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 20, 2020. The complaint alleged that Equal Opportunity PAC, a political committee supporting and opposing legislative candidates in the 2020 election, may have violated: (1) RCW 42.17A.235 and RCW 42.17A.240 for failure to timely and accurately disclose expenditures for political advertising and debts; (2) RCW 42.17A.240 and WAC 390-16-037 for failure to accurately and completely disclose expenditure details, including the number of items printed; and (3) RCW 42.17A.255, .260, and .305 for failure to timely, accurately, and completely disclose independent expenditures and electioneering communications.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by the Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- On August 20, 2020, Equal Opportunity PAC submitted a Committee Registration Statement (C-1pc report) registering as a new committee under the “Full Reporting” option and listing Kan Qui as Manager/Treasurer and Sharon Hanek as Ministerial Treasurer.
- RCW 42.17A.235 and 42.17A.240 identifies the due dates required for political committees registered with the PDC to submit Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign, and the type of information required to be disclosed on C-4 reports.
- RCW 42.17A.255, .260 and .305 identify the due dates required to be submitted on Independent Expenditure and Electioneering Communications reports (C-6 reports) for committees making independent expenditures supporting or opposing candidates and describes the type of information required to be disclosed on C-6 reports.
- The complaint alleged that the C-4 filed by the Respondent on October 13, 2020, did not accurately disclose expenditures for mailing costs and alleged that expenditures were disclosed on the first C-6 report filed by the PAC but were not disclosed on the committee’s C-4 reports.
- In response, Equal Opportunity PAC stated that the C-4 report included the level of detail they believed was required and upon closer review, recognize that the descriptions did need additional detail. The PAC specifically answered the allegation regarding the

expenditure for mailing costs, stating that the expenditures were for 1.142 rolls of stamps and miscellaneous envelopes. In response to the allegation that the C-4 report did not disclose the same expenditures reported on the C-6, the PAC believes that the C-4 expenditures are complete with the exception of one expenditure date that was mistyped and needed correction and one vendor name that was missing the last portion of its name identifying the specific branch location.

- The complaint included comments regarding an expenditure or debt owed to Visa for credit card transactions but did not include specific allegations related to these transactions. The Respondent addressed this concern stating that the credit card was issued to the committee manager and was used to make campaign expenditures and reported in the manner provided to them by PDC staff.
- The Respondent is a newly registered committee with one committee officer and a ministerial treasurer and cooperated with staff during the investigation.

It appears that, although the campaign activity reports filed by the Respondent contained a small number of errors needing correction, Equal Opportunity PAC made a good faith effort to fully disclose the PAC's activity on both C-4 and C-6 reports in a timely manner and did not intend to keep relevant campaign activity from the public.

Based on our findings staff has determined that, in this instance, failure to include complete descriptions on a small number of expenditures does not amount to a finding of a violation that warrants further investigation.

PDC staff is reminding Equal Opportunity PAC about the importance of the timely and accurate disclosure of all campaign debts and expenditures, specifically including the detailed descriptions required on both C-4 and C-6 report on all future PDC reports in accordance with the statutes and rules.

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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

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Barbara Sandahl
Deputy Director
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cc: Equal Opportunity PAC