

[Equalopac](#) (Wed, 18 Nov 2020 at 11:26 AM)

Washington Public Disclosure Commission
711 Capitol Way Room 206
Olympia, WA 98504

Respondent: Equal Opportunity Pac
Complaint Filed by: Alex Bond

Public Disclosure Officer:

We received your complaint referenced to above and have analyzed the alleged items. Our response is broken into the three parts that is referred to in the complaint.

- 1.) The campaign reported items on the C4 report that were not clearly identified by quantity. Upon review, we now have the proper numbers that were not clear to the Treasurer at the time of filing and are amending the report. The \$31,408.60 in mailing costs was a large purchase of inventory of stamps in the quantity of 1,142 rolls of .55 stamps and \$3.60 of incidental mailing of envelopes. The stamps were purchased in advance of any items being printed or prepared for mailing.
- 2.) It was alleged that the C4 neglected to report the following items:

\$600 to Daily News of Longview
\$700 to RMC Services
\$960 to Sound Publishing
\$300 to RMC Services

These items were all reported on the C4 forms. The "Daily News of Longview" is also called "Aberdeen daily news" and a down payment for a series of ads was reported on the 10/12/2020 C4 report, although the date was incorrectly reported as 9/4/2020 and should be 9/28/2020.

The payments to RMC Services were reported on the 10/26/2020 C4 report as a cumulative amount of all invoices for all consulting services billed to the PAC. This included the amounts of \$700 and \$300 questioned above.

The Sound Publishing payment was reported on the 10/26/2020 reported although it left off the words "of Everett" on the Schedule B of the 10/26/2020 C4.

- 3.) Finally, the question of whether the Equal Opportunity PAC has a credit card in its own name is true, however the credit card used had a zero balance and is 100% dedicated to the campaign. There is no co-mingling of dollars with other purchases. Credit cards are rarely issued to the name of an organization, corporation, or non-profit but credit cards are issued to an individual with authority in the company. In this case the credit card was held in the name of the Manager of the campaign. Conversations with PDC agent had revealed that the use of an extra zero balance credit for a campaign can be appropriate when that card becomes dedicated to this single campaign organization. Please advise us otherwise.

In light of this information and the amended C4 reports, we respectfully request that you clear the Equal Opportunity PAC of all alleged complaints. Information has not been hidden from the public.

Please note that attempts to amend the C4 reports had "server error upload" error messages and transmittals did not go through.

Attached are our copies of the report as we continue to pursue transmittal to the PDC.

**SUMMARY, FULL REPORT
 RECEIPTS AND
 EXPENDITURES**

Candidate or Committee Name (Do not abbreviate. Include full name)
Equal Opportunity PAC

Mailing Address City
14150 NE 20th Street Ste F1-457 Bellevue

Zip + 4 Office Sought (Candidates) 2020
98007

Report Period From (last C-4) To (end of period) Final Report?
 Covered **09/01/2020** **10/12/2020** Yes No **X**

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?

RECEIPTS *See next page Yes No **X**

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		\$500.00
2. Cash received (From line 2, Schedule A)	\$1,000.00	
3. In kind contributions received (From line 1, Schedule B).....	\$0.00	
4. Total cash and in kind contributions received this period (Line 2 plus 3).....		\$1,000.00
5. Loan principal repayments made (From line 2, Schedule L).....	\$0.00	
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)	\$0.00	
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)		\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$1,500.00
9. Total pledge payments due (From line 2, Schedule B).....	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		\$0.00
11. Total cash expenditures (From line 4, Schedule A).....	\$95.49	
12. In kind expenditures (goods & services) (From line 1, Schedule B)	\$0.00	
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....		\$95.49
14. Loan principal repayments made (From line 2, Schedule L).....	\$0.00	
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	\$0.00	
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)		\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$95.49

CANDIDATES ONLY

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:
(425) 588-8011

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)..... <small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small>	\$1,404.51
19. Liabilities: (Sum of loans and debts owed)	\$33,592.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	-\$32,187.49

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
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CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4 **A**
(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

Equal Opportunity PAC

09/01/2020 10/12/2020

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
10/05/2020	\$1,000.00					\$

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 **\$ 1,000.00**

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed.

The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveller and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE	C - Contributions (monetary, in-kind & transfers)	P - Postage, Mailing Permits
DEFINITIONS	I - Independent Expenditures	S - Surveys and Polls
ON NEXT PAGE	L - Literature, Brochures, Printing	F - Fundraising Event Expenses
	B - Broadcast Advertising (Radio, TV)	T - Travel, Accommodations, Meals
	N - Newspaper and Periodical Advertising	M - Management/Consulting Services
	O - Other Advertising (yard signs, buttons, etc.)	W - Wages, Salaries, Benefits
	V - Voter Signature Gathering	G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$0.00
10/01/2020	UPS 3800A Bridgeport Way W University Place WA 98466		Mail box rent	\$95.49

Total from attached pages **\$ 0.00**

4. TOTAL CASH EXPENDITURES Enter also on line 11 of C4 **\$ 95.49**

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE
TO C4

B

(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.)
Equal Opportunity PAC

Report Date
09/01/2020 10/12/2020

3. ORDERS PLACED, DEBTS, OBLIGATIONS. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)

Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code	OR	Description of Obligation
	VISA 1 Market Street #600 San Francisco WA, 94105	\$33,592.00			
09/04/2020	BLUE HOST 1958 950E Provo UT, 84606				Website expense \$250.20
09/04/2020	GODADDY 14455 N. Hayden Rd Scottsdale AZ, 85260				Website expense \$13.20
09/16/2020	US POST OFFICE 12224 NE Bel Red Rd Bellevue WA, 98005				Mailing costs (1142 rolls of 1oz stamps + office mail) \$31,408.60
09/28/2020	ABERDEEN DAILY NEWS PO Box 269 Aberdeen WA, 98520				Newspaper ad downpymt - aka Daily News of Longview \$1,920.00
TOTAL THIS PAGE		\$33,592.00			

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RECEIPTS *See next page Yes No **X**

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		\$1,500.00
2. Cash received (From line 2, Schedule A)	\$0.00	
3. In kind contributions received (From line 1, Schedule B).....	\$0.00	
4. Total cash and in kind contributions received this period (Line 2 plus 3).....		\$0.00
5. Loan principal repayments made (From line 2, Schedule L).....	\$0.00	
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)	\$0.00	
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)		\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$1,500.00
9. Total pledge payments due (From line 2, Schedule B).....	\$0.00	

EXPENDITURES

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11. Total cash expenditures (From line 4, Schedule A).....	\$0.00	
12. In kind expenditures (goods & services) (From line 1, Schedule B)	\$0.00	
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....		\$0.00
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17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$95.49

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Treasurer's Daytime Telephone No.:
(425) 588-8011

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)..... <small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small>	\$1,404.51
19. Liabilities: (Sum of loans and debts owed)	\$62,858.59
20. Balance (Surplus or deficit) (Line 18 minus line 19)	-\$61,454.08

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
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IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE
TO C4

B

(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

Equal Opportunity PAC

10/13/2020 10/26/2020

3. ORDERS PLACED, DEBTS, OBLIGATIONS. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)

Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code OR	Description of Obligation
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09/04/2020	BLUE HOST 1958 950E Provo UT, 84606			Website expense \$250.20
09/04/2020	GODADDY 14455 N. Hayden Rd Scottsdale AZ, 85260			Website expense \$13.20
09/16/2020	US POST OFFICE 12224 NE Bel Red Rd Bellevue WA, 98005			Mailing costs (1142 rolls of 1oz stamps + office mail) \$31,408.60
09/28/2020	ABERDEEN DAILY NEWS PO Box 269 Aberdeen WA, 98520			Newspaper ad downpymt - aka Daily News of Longview \$1,920.00
10/17/2020	RMC SERVICES PO Box 8055 Bonney Lake WA, 98391			Consulting \$7,400.00
10/25/2020	RMC SERVICES PO Box 8055 Bonney Lake WA, 98391			Consulting \$6,590.00
10/23/2020	CAPITOL CITY PRESS 2975 37th Ave SW Tumwater WA, 98512			Printing (56,536 pages) \$14,316.59
10/17/2020	SOUND PUBLISHING 11323 Commando Road W Everett WA, 98204			Advertisement \$960.00
TOTAL THIS PAGE		\$62,858.59		