



**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.pdca.wa.gov

January 7, 2021

Sent electronically to oose781@gmail.com and ridevintage12@yahoo.com

Subject: Complaint filed by Josalun Hasz, PDC Case 79585

Dear Committee to Hold Elected Officials Accountable:

Enclosed is a copy of an electronic letter sent to Josalun Hasz concerning a complaint filed October 21, 2020 with the Public Disclosure Commission (PDC) alleging a violation of RCW 42.17A.255, .260, and .305 by failing to accurately and completely disclose independent expenditures and electioneering communications.

As noted in the letter below, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of timely and accurately reporting expenditures and expenditure detail and PDC staff expects in the future you will timely file accurate and complete reports, in accordance with PDC laws and rules.

PDC staff is also reminding you about the importance of including complete sponsor identification in political advertising when sending emails and text messages. PDC expects in the future you will follow requirements of [RCW 42.17A.320](#). More information is also available on the [PDC website](#).

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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January 7, 2021

Sent electronically to josalun@srcc.org

Subject: Complaint regarding Committee to Hold Elected Officials Accountable, PDC Case 79585

Dear Josalun Hasz:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed October 21, 2020. Your complaint alleged the Committee to Hold Elected Officials Accountable (Committee) violated RCW 42.17A.255, .260, and .305 by failing to accurately and completely disclose independent expenditures and electioneering communications.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, and the response from Don Benton, treasurer for the Committee to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- September 9, 2020 the Committee to Hold Elected Officials Accountable (Committee) filed a Committee Registration with the PDC, selecting the Full Reporting Option and listing Rob Enders as Chairman and Mary Benton as Ministerial Treasurer. The Committee amended its registration seven times, with the most recent registration filed October 23, 2020 listing Rob Enders as Chairman, Kelsey Scott as Secretary/Treasurer and D.M. Benton as Committee Member. The Committee filed under the Full Reporting option as a Continuing Committee, however listed "originally targeting 2020."
- The Committee filed three Monetary Contribution (C-3) reports and four Full Campaign Contribution and Expenditure (C-4) reports during the 2020 Election.
- In a C-4 report originally filed October 27, 2020 and amended December 28, 2020, the Campaign reported \$24,348 in contributions and \$24,195.89 in expenditures during the campaign.
- The Committee filed three Independent Expenditure Advertising (C-6) reports during the 2020 election cycle. The C-6 reports were filed with the PDC on October 19, 20 and 23, 2020 with all three listed supporting Tom Mielke and opposing Anna Rivers for the 18th District Senate.
- As noted in the complaint, the C-6 report filed October 19, 2020 listed two expenditures totaling \$2,890 to Call Multiplier.com in Oklahoma City, OK described as Auto Contact.
- In response, Don Benton stated he was responsible for the Committee's PDC filings, noting "I apologize for the delay in response as I have not had access to email for a while. We assumed everyone understood that Auto contact for a company called Call Multiplier

meant auto calls. That is what was meant. If I need to file an amendment to clarify I certainly will but I really do think it is pretty clear for most people to understand.”

- In review of the Committee’s PDC filings, PDC staff found the Committee’s C-4 reports listed the expenditures to Call Multiplier.com, however the C-4 report originally filed October 24, 2020 failed to include expenditure detail required by RCW 42.17A.240. Once notified of the requirements, the Committee updated the C-4 report December 28, 2020 to include the required expenditure detail.
- The Committee is working with PDC staff to update its C-6 reports, adding additional detail to its C-6 reports to clarify the expenditure to Call Mulitplier.com.

Based on these findings, and the fact the Committee filed original reports timely and made a good faith effort to comply with the reporting requirements concerning its expenditures, and the public was not deprived of critical information as the dates, amounts, and purposes of the expenditures were disclosed, staff has determined, in this instance, the failure to timely and accurately report expenditure detail does not amount a violation warranting further investigation.

PDC staff is reminding the Committee to Hold Elected Officials Accountable about the importance of filing timely, accurate and complete reports in accordance with PDC laws and rules. PDC staff is also reminding the Committee about the importance of including complete sponsor identification in political advertising.

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, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director