

PDC for case 99304

[Charlotte Benjamin](#)

reported via email

October 27, 2021

To: "Washington Public Disclosure Commission" <cdc@cdc.wa.gov>

External Email

To: Erick Agina, Tabitha Townsend and Ladelle Fuquay:

On behalf of the We Want Accountability PAC, I want to thank you for your courtesies and allowing the PAC to respond to Mr. Britain's allegations. We want to clear up any misunderstandings that may have occurred, and resolve any problems as soon as possible.

Allegation #1

According to the PDC website on political advertising, "PDC staff recommends that any donor that gave \$1,000 during 12-month period preceding the date on which the advertisement is published or presented to the public be considered for the Top 3. If more than three contributors to a "Top 5" political committee tie for the top donation, the sponsor may select which three of those contributors to identify."

The National Association of Broadcasters limits are more stringent than the PDC's, i.e., the limit is \$700. **No** individual contributed to the PAC \$700 or more in the 12 month period, which is less than the \$1,000 limit that the PDC requires. This can be verified by viewing the PAC's C3s. The PAC complied with guidance from the National Association of Broadcasters and the PDC in order to air the advertising without needing to list any donors.

Finally, the radio stations insisted that the PAC sign the "Issue (Non-Candidate) Advertisement Agreement Form.

Allegation #2

RCW 42.17A.320--Identification of Sponsor

(5) The following statement shall be clearly spoken in an independent expenditure of electioneering communication transmitted by a method that does not include a visual image: No candidate authorized this ad. Paid for by (name, city, state)."

In the PAC's current ads, which have been produced by the radio stations, we use the language: "No candidate authorized this ad. Paid for by We Want Accountability PAC." We assumed that the local radio stations knew the requirements and stated this correctly. Until now, no one has suggested we also needed to include the city and state in this statement.

Further, on the PDC website under "Political Advertising", subparagraph "Sponsor Requirements", it states to use the words "paid for by" or "sponsored by" followed by the sponsor's name & address. And according to the radio transcripts sent by Mr. Britain in the compliant, at the end of the airing, the notices to the public says "Paid for by We Want Accountability PAC."

If there is anything else that the PAC needs to do or change anything, the PAC will certainly comply to the PDC's direction.

Thank you.

Charlotte Benjamin
Treasurer for
We Want Accountability PAC