



**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: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

December 27, 2021

Delivered electronically to [jandrmartin@protonmail.com](mailto:jandrmartin@protonmail.com) and [lilylangtree@yahoo.com](mailto:lilylangtree@yahoo.com)

Subject: Complaints filed by Don Britain and Lillian "Randy" Slovic

Dear We Want Accountability PAC:

Enclosed is a copy of an electronic letter concerning complaints filed October 1 and 28, 2021 with the Public Disclosure Commission (PDC).

On December 23, 2021 the PDC received the completed Statement of Understanding (SOU) acknowledging violations of RCW 42.17A.305 by failing to timely file an Independent Expenditure (C-6) report disclosing Committee expenditures made during the 2021 Election for electioneering communications and RCW 42.17A.320 and RCW 42.17A.350 by failing to include the required "Notice to Voter" language for independent expenditure radio advertisements and failing to disclose the Top 5 contributors in its radio ads.

The payment of the \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule) resolves the issue of failing to timely file an Independent Expenditure (C-6) report disclosing Committee expenditures made during the 2021 Election and failing to include the required "Notice to Voter" language for independent expenditure radio advertisements and failing to disclose the Top 5 contributors in its radio ads.

Pursuant to WAC 390-37-060(1)(d), this letter serves as a formal written warning concerning violations of RCW 42.17A.240 by failing to timely and accurately disclose expenditure descriptions on Full Summary Contributions and Expenditures (C-4) reports. Staff expects you will, in the future, timely and accurately disclose expenditures as required by law.

The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

The PDC will not be conducting a more formal investigation into these allegations or take any further enforcement action in this matter. Based on this information, the PDC has dismissed the case in accordance with RCW 42.17A.755(1) and WAC 390-37-070.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov)

Sincerely,

/s

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Alice Fiman  
Compliance Officer

Endorsed by,

/s

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Kim Bradford, Deputy  
Director for Peter Lavalley  
Executive Director



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December 27, 2021

Delivered electronically to [britain4council@gmail.com](mailto:britain4council@gmail.com) and [rslovic@gmail.com](mailto:rslovic@gmail.com)

Subject: Complaints regarding We Want Accountability PAC, PDC Cases 99304 and 100399

Dear Don Britain and Lillian "Randy" Slovic:

The Public Disclosure Commission (PDC) completed its review of the complaints you filed October 1 and 28, 2021. The complaints alleged We Want Accountability PAC may have violated RCW 42.17A.320 for failure to include required language in radio advertisements and RCW 42.17A.240, .255 or .260 by failing to provide the required expenditure description on Full Summary Contributions and Expenditures (C-4) reports. During its investigation, PDC staff included an alleged violation of RCW 42.17A.350 for failing to disclose the Top 5 contributors during its radio ads and RCW 42.17A.305 by failing to timely file an Independent Expenditure (C-6) report disclosing Committee expenditures made during the 2021 Election for electioneering communications.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports; and the response from the Committee, to determine whether the record supports a finding of one or more violations.

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

- We Want Accountability PAC (committee) first registered with the PDC as a Continuing Political Committee on September 14, 2019 and updated its registration on September 4, 2021. Both registrations listed Vincent Rundhaug as chairman, Jerry Martin as secretary and Charlotte Benjamin as ministerial treasurer.
- During Election Year 2021, the Committee reported \$7,790 in contributions and \$7,572.28 in expenditures.
- The Committee reported expenditures totaling \$6,246 in radio advertising during the 2021 campaign as follows: \$1,680 was reported as spent on July 21, \$704 was reported as spent July 23, \$2,400 was reported as spent October 18, and \$1,462 was reported as spent October 22.

- The Committee first reported the radio advertisements timely, however the reports lacked the required expenditure detail of radio stations, air dates, and candidates supported or opposed.
- The required expenditure detail was reported on C-4 reports amended December 4, 2021, which was 32 days after the 2021 General Election.
- On December 1, 2021, the Committee filed a C-6 report listing Electioneering Communications made on July 21 and 23, 2021 for radio ads from July 16 to August 3, 2021.
- The C-6 listed the expenditure as supporting Kennewick City Council candidates Gretl Crawford (\$858.24), William McKay (\$762.88) and John Trumbo (\$762.88). As no expenditures exceeded \$1,000 in the aggregate for any of the candidates, a C-6 report was not required.
- On December 1, 2021, the Committee filed a C-6 report listing Electioneering Communications on October 18 and 23, 2021 and presented to the public October 15, 2021. The C-6 listed the expenditure as supporting Kennewick City Council candidates Gretl Crawford (\$1,004.12), William McKay (\$849.64), John Trumbo (\$849.64), and Loren Anderson (\$849.64), and Kennewick School District School Director candidates Micah Valentine (\$154.48) and Gabe Galbraith (\$154.48).
- As aggregate expenditures for candidates Crawford, McKay, and Trumbo now exceeded \$1,000, a C-6 report was required to be filed within 24 hours of, or on the first working day after, the date the communication was first broadcast. The C-6 report was filed 46 days late and 29 days after the November 2, 2021 General Election.
- There is no evidence the radio advertisement included the required sponsor's statement, "No candidate authorized this ad. Paid for by (name, city, state)" or "Top Five Contributors" followed by a list of the names of the five contributors who made the largest contributions of \$1,000 or more to the committee during the 12 months before the ad appeared.
- On December 23, 2021, the PDC received a completed Statement of Understanding (SOU) from the Committee acknowledging violations of RCW 42.17A.305 by failing to timely file an Independent Expenditure (C-6) report disclosing Committee expenditures made during the 2021 Election for electioneering communications and RCW 42.17A.320 and RCW 42.17A.350 by failing to include the required "Notice to Voter" language for independent expenditure radio advertisements and failing to disclose the Top 5 contributors in its radio ads.
- The Committee paid a \$300 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), which resolves the issue.

Pursuant to WAC 390-37-060(1)(d), We Want Accountability PAC will receive a formal written warning concerning a violation RCW 42.17A.240 by failing to timely and accurately disclose the expenditure descriptions on Full Summary Contributions and Expenditures (C-4) reports. Staff expects the Committee will, in the future, timely and accurately disclose expenditures as required by law.

The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

The PDC will not be conducting a more formal investigation into these allegations or take any further enforcement action in this matter.

Based on this information, the PDC has dismissed the case against We Want Accountability PAC, in accordance with RCW 42.17A.755(1) and WAC 390-37-070.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov).

Sincerely,

Endorsed by,

/s

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Alice Fiman  
Compliance Officer

/s

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Kim Bradford, Deputy  
Director for Peter Lavalley  
Executive Director