



State of Washington
PUBLIC DISCLOSURE COMMISSION
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Public Disclosure Commission

Statement of Understanding: We Want Accountability PAC

PDC Cases 99304 and 100399

I Vince Rundhaug, as Chairman, We Want Accountability PAC, hereby
(Printed Name) acknowledge

We Want Accountability PAC violated:

- 1) 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, specifically advertisements that supported City of Kennewick City Council candidates Gretl Crawford, William McKay, and John Trumbo.

RCW 42.17A.305 requires Electioneering Communications advertisements to have all of the following four characteristics (1) the communication clearly identifies at least one candidate for state, local or judicial office; (2) the communication appears within 60 days of an election in the candidate's jurisdiction; (3) the communication appears in one or more of the following media – radio, television, postal mailing, billboard, newspaper or periodical; and (4) the communication either alone, or in combination with other communications by the sponsor identifying the candidate, has a fair market value of \$1,000 or more. In addition, electioneering communications must be reported electronically within 24 hours of, or on the first working day after, the date the communication was first broadcast, mailed, erected, or published.

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- 2) 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.

RCW 42.17A.320(5) requires all radio and television political advertising, whether relating to candidates or ballot propositions, to include the sponsor's name and the statement "No candidate authorized this ad. Paid for by (name, city, state)." For any requirement to include the top five contributors under RCW 42.17A.320, RCW 42.17A.350 requires the sponsor to identify the five persons or entities making the largest contributions to the sponsor in excess of the threshold aggregate value to be considered an independent expenditure under RCW 42.17A.005 (\$1,000) during the 12-month period preceding the date on which the advertisement is initially to be published or otherwise presented to the public. If one or more of the top five contributors is a political committee, the top three contributors to each of those political committees must be identified in accordance with RCW 42.17A.350(2).

- 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.
- 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.

We Want Accountability PAC would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding (Brief Enforcement Hearing) being scheduled by Public Disclosure Commission (PDC) staff.

Therefore, in lieu of PDC staff scheduling a Brief Enforcement Hearing, We Want Accountability PAC is completing this Statement of Understanding, acknowledging violations of RCW 42.17A.305, RCW 42.17A.320 and RCW 42.17A.350, and enclosing a check or money order in the amount of \$300 as a penalty payment to resolve this matter.

The \$300 penalty being assessed against We Want Accountability PAC is for one late C-6 report and failing to include required language to voters in radio advertising. The \$300 penalty is being assessed in accordance with the Penalty Schedule and mitigating and aggravating factors adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143.

We Want Accountability PAC understands that by completing this Statement of Understanding, it acknowledges the violations as set forth above and is waiving its right to a hearing in this matter. The Committee further understands this Statement of Understanding resolves the issue concerning violations of RCW 42.17A.305, RCW 42.17A.320 and RCW 42.17A.350.

s/
for 
Vincent Rundhaug

12/16/21
Date Signed

Please make your check or money order payable to the “**Washington State Treasurer**” and be sure to include the PDC Case number in the memorandum field, and print, sign and mail this Statement of Understanding along with your payment to:

Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908



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