

JoAnn Kaiser replied (Sun, 15 Jun 2025 at 8:01 PM)

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Thank you for the opportunity to respond to the complaint regarding the filings of the Washington Association of Nurse Anesthetists Political Action Committee (WANA PAC). We appreciate the PDC's guidance and are committed to correcting all identified errors and ensuring full compliance moving forward.

Allegation One: Discrepancy in Ending/Beginning Balances for 2024–2025

The discrepancy between the ending balance for Election Year (EY) 2024 (\$9,575.80) and the beginning balance for EY 2025 (\$7,969.81) has been corrected. We have amended the January 2025 C-4 report to reflect the correct beginning balance of \$9,575.80, ensuring proper alignment between reporting periods.

Explanation of the Discrepancy:

This discrepancy resulted from timing delays inherent in third-party payment processing platforms used for donor contributions. When donors make online contributions, these platforms process the donations and deduct their processing fees before depositing the net amount into our bank account. This deposit delay, combined with the fee deductions, created a gap between recorded donations and actual bank deposits.

The former volunteer team responsible for PAC reporting did not fully account for these processing fees in their financial reconciliation. As a result, small discrepancies accumulated over time. In 2024, WANA PAC transitioned to a paid professional management and accounting firm to improve our reporting accuracy. This firm has been systematically working to identify and correct these historical discrepancies. The ending balance discrepancy between 2024 and 2025 reflects this correction process, which has now been resolved with the PDC's assistance to our management firm.

Allegation Two: Failure to Follow Accelerated Pre-Election Reporting Schedule

We acknowledge that WANA PAC did not follow the accelerated C-4 reporting schedule for the 2024 election cycle. This was due to insufficient awareness of this specific requirement and was not intentional. We have since conducted a comprehensive review of all PDC reporting requirements and will fully comply with the accelerated pre-election schedule beginning in June 2025.

Allegation Three: Missing Vendor Address for IRS Expenditure

The vendor address for the \$8,476.03 expenditure to the IRS on the November 2024 C-4 report has been amended to include the complete IRS mailing address. This omission was an oversight due to the electronic nature of the tax payment transaction. We now understand the requirement to include complete vendor mailing information regardless of payment method, and all future reports will include complete vendor information as required.

Administrative Improvements: During our transition to professional management, we experienced some delays in monthly filing submissions. We have implemented new internal tracking systems with our management firm to ensure consistent, timely reporting going forward. These systems include automated reminders and dual review processes to prevent future oversights.

Conclusion: We remain committed to full transparency and accountability in our political activities. We appreciate the Commission's oversight in helping us identify and correct these issues. This response represents our good faith effort to address all identified concerns and implement lasting improvements to our reporting practices.

Should the Commission require any additional clarification or documentation, we are prepared to provide it promptly. Thank you, in particular, to Compliance Officer Tabatha Blacksmith for assisting the WANA PAC team in understanding and executing these corrections.

Best,

Kelli Camp, DNP, CRNA, ARNP
President WANA