Respondent Name

Equal Opportunity PAC

Complainant Name

Alex Bond

Complaint Description

Alex Bond (Tue, 20 Oct 2020 at 2:28 PM)

Equal Opportunity PAC was registered as a continuing political committee on August 20, 2020. On October 13, 2020, they filed a C4 report #101006259. There are two, possibly three problems with this C4.

As a part of a \$33,592 debt, they report \$31,408.60 in "mailing costs" at a US Post Office. This is not a complete report of the vendor information. WAC 390-16-037 outlines how a mailing should be reported, including how many pieces are being mailed, who the printing vendor is assuming there was one - after all nothing can be mailed without there having been something printed, or paper or postcards purchased and handwritten upon - and the candidate or ballot measure supported or opposed if required under RCW 42.17A.240 or 42.17A.255. And if these are in fact independent expenditures in support or opposition to a candidate or ballot measure, they should be reported appropriately on a C6.

Secondly, the C4 in question covers the period 09/01/20 to 10/12/20. According to the C6 form 10454 filed by Equal Opportunity PAC on 10/19/20, on 10/09/20 they spent \$600 on a newspaper ad with The Daily News of Longview, on 10/09/20 they spent \$700 on "consulting on ads" with RMC Services of Bonney Lake, on 9/28/20 they spent \$960 on newspaper ads with Sound Publishing of Everett, and on 9/28/20 they spent \$300 on "consulting on ads" with RMC Services. These expenditures were not reported on the C4.

Thirdly, they report the \$33,592 debt directly to VISA. If Equal Opportunity PAC has its own line of credit with VISA, this is accurate reporting, but it is unusual for PACs to hold their own credit cards. If the credit card is held by an individual or a different organization, as is more commonly done, it should be reported as a debt to the holder of the card, not to the credit card company. I would encourage the PDC to ask Equal Opportunity PAC to clarify the nature of the debt and confirm who is the holder of the credit card.

What impact does the alleged violation(s) have on the public?

They are concealing their expenditures from voters

List of attached evidence or contact information where evidence may be found

C4 report # 101006259

http://web.pdc.wa.gov/rptimg/default.aspx?repno=101006259

C6 report # 10454

https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=C6-10454

List of potential witnesses with contact information to reach them

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.