

Elisabeth Wittenberg replied

(Thu, 21 Sep 2023 at 3:37 PM)

To: "PDC Support" pdcc@pdc.wa.gov

Cc: elisabeth.wittenberg@rpecwa.org

External Email

Good afternoon. Below is the Retired Public Employees Council of Washington's (RPEC) required response to the complaint received on August 31st (Case 141681) alleging failure to timely and accurately report contributions and expenditures as well as disclosure of required expenditure details. We thank Tabatha Blacksmith, the Compliance Officer assigned to our case, for her assistance in identifying items needing amending and her patience in setting up a time to discuss next steps. She's been a pleasure to work with, and we appreciate her counsel.

The majority of Items detailed in the complaint, resulted from:

1. **2021 staffing turnover:** In 2021, RPEC's Accountant position (the staff member responsible for filing forms C3 and C4) was filled by four different staff members, two of which were temporary. I began working with RPEC in late August of 2021 and have and will continue to document, review and update process and protocols to help ensure future knowledge transfer of PDC filing and requirements.
2. **Amended returns:** Upon completing my first C3 and C4 forms in September 2021, I discovered some items (dated July through September of that year) which were not originally reported. I immediately contacted the PDC to learn how these filings could be amended. I documented the interaction with the PDC staffer, and followed up with email verification, summarizing the changes I had made both to C3 and C4 reporting.
3. **Prior balance correction and amended returns:** As I grew in my role, I learned that the beginning balance on the January 2021 C4 did not balance to RPEC's bank statement. Again, I contacted the PDC to learn how to make the necessary changes. The difference (between RPEC's bank account balance and the January 2021 C4 filing amount) was very small (December 2020 bank interest not originally reported). I was instructed by the PDC staffer to enter the interest from December 2020 with a date of January 1, 2021, and re-filed the C3 accordingly. I documented this interaction with the counsel I had received. By filing an amended January 2021 C3 form, it became necessary to also file corrections to the January 2021 through April 2022 C4 filings which were completed in June of 2022.
4. **Missing required information:** In reviewing the claim with the compliance officer, a few additional expenditure details are needed on some expenditures cited between 2018 and 2023. In most cases, the additional details that must be added include citing the number of printed pieces (in the case of printing and mailing services) and providing a short description of the nature of the "Contribution". Those items have been added and amended C4s filed accordingly. These details were not left off intentionally. Now that we are aware of this required information, it will be included in filings to ensure full compliance.

Please reach out to me if you have further questions or require additional details from us to satisfy the need for an official reply to the August 31st complaint.

On a closing personal note, I deeply appreciate all the time and energy Tabatha, and other PDC staff have invested with me over the last two years as I develop greater knowledge and skill to ensure RPEC's full compliance with PDC requirements.

Sincerely,

Elisabeth Wittenberg

Finance & Operations Specialist
360-352-8262, ext 102