

[Hayden Williams](#) replied an hour ago (Tue, 11 Sep at 6:46 AM)

to : [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

To Whom it May Concern:

On behalf of the WSCPA PAC, I am responding to the formal complaint filed by Glen Morgan.

On account of personnel and role/responsibility changes within the PAC and Society, the PAC inadvertently missed certain filing deadlines. Immediately upon learning about this inadvertent oversight, I personally called the PDC, identified the problem, and asked about appropriate corrective action. The PDC advised us to update our filings as quickly as possible, which we did. We have also implemented organizational changes to ensure that these issues do not re-occur. Since notice of the problem, the PAC has met all of its filing deadlines.

The PAC certainly never purposefully avoided any filing obligations and has never filed any reports with inaccurate information. To the contrary, as demonstrated by my affirmative outreach and our immediate curative efforts, we were interested in compliance and transparency. Below, I address each of the specific accusations and how we have corrected (if applicable) those issues.

- 1) Failure to file accurate, timely C3 and C4 reports, failure to timely deposit contributions. (Violation of RCW 42.17A.235, .220)
  - The WSCPA filed C3s and C4s late. To our knowledge have never filed an inaccurate report for either the C3 or C4. We are now filing C4s timely based on the schedule posted. The C3s are filed every Monday (except when it falls on a holiday) and the corresponding deposits are made on that Monday the C3 is filed.
- 2) Failure to report last minute contributions. (Violation of RCW 42.17A.265)
  - The WSCPA has filed contributions of \$1,000 or more in a special reporting periods twice where we did not inform the PDC within the 48 hour window. We reported the contributions, but late. We are aware of the rules for the two special reporting periods before the primary and general elections, and now have processes in place to check diligently each day during these special periods for any contributions over \$1,000.
- 3) Failure to list committee officers, timely file/update C-1/C-1PC. (Violation of RCW 42.17A.205, see WAC 390-05-245)
  - The WSCPA files a C-1 when any changes in the PAC committee structure changes, but did not do it timely as the rules states. We have corrected this as well. As soon as there is any change in the WSCPA PAC committee structure, the WSCPA reports that change within the 10-day period.
- 4) Illegal unauthorized expenditure of funds by an individual not listed as an officer on form C-1/C1-pc. (Violation of RCW 42.17A.425)
  - The WSCPA has never made any illegal unauthorized expenditures of funds by anyone listed on the C-1.
- 5) Failure to preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred. (Violation of RCW 42.17A.235 (6)).
  - The WSCPA has always maintained its books for more than 5 years and has done it accurately and ethically.
- 6) Illegal depositing of campaign funds into bank account by person other than the treasurer or deputy treasurer. (Violation of RCW 42.17A.220 (1))
  - The WSCPA has always made it a practice that the treasurer deposits the funds.
- 7) Failure to include sponsor ID. (Violation of RCW 42.17A.320)
  - The WSCPA does no political advertising which requires our Sponsor ID. We are a professional membership organization who periodically ask for contributions from our members.
- 8) Failure to timely file form C6 reporting independent expenditure. (Violation of RCW 42.17A.255(2))
  - The WSCPA does not engage in any "independent expenditures" and does not need to file a C-6.

Again, we acknowledge, appreciate the gravity of, and are sorry for our inadvertently late filings. But these errors were minor and have been cured. And we have taken the necessary steps to be in compliance and expect to continue these corrective actions into the future.

Hayden Williams.

**Hayden Williams, CPA, CGMA** | CFO  
Washington Society of CPAs