

Complaint Description

[Jim Lazar](#) (Fri, 31 Aug at 3:33 PM)

No On 1631, sponsored by the Western States Petroleum Association, filed a C4 on August 10, which included an expenditure of \$154,548.00 to Amplified Strategies. The only identified purpose of this is "mail."

WAC 390-16-037 requires more detailed disclosure, specifically the number of pieces printed and mailed. The compliance consultant to No On 1631 should be well aware of this requirement.

I assume that this complaint will be resolved by the campaign filing a corrected C4, and this complaint will be treated as resolved. However, if No On 1631 does ANOTHER such failed disclosure, I will expect the PDC to impose appropriate penalties.

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

Conceals the number of pieces of mail advertising contracted for by the campaign.

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

C4 report of No on 1631, Attachment to Schedule A; See page 5 attached.

Email from Jenny Pollek, PDC, to Jim Lazar August 31, 2018

List of potential witnesses with contact information to reach them.

Complaint Certification:

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.

**SUMMARY, FULL REPORT
 RECEIPTS AND
 EXPENDITURES**

C4 (3/97)	PDC OFFICE USE
	100851984
	08-10-2018

Candidate or Committee Name (Do not abbreviate. Include full name)
No on 1631 (Sponsored by Western States Petroleum Association)

Mailing Address: **PO Box 7035** City: **Olympia, WA**

Zip + 4 98507	Office Sought (Candidates)	Election Date 2018
Report Period Covered 07/01/18	From (last C-4) To (end of period) 07/31/18	Final Report? Yes No X

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)

RECEIPTS	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$		\$15,033.32
2. Cash received (From line 2, Schedule A)	\$		\$1,731,358.48
3. In kind contributions received (From line 1, Schedule B).....			\$12,557.10
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			\$1,743,915.58
5. Loan principal repayments made (From line 2, Schedule L).....			\$0.00
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)			\$0.00
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)			\$1,758,948.90
9. Total pledge payments due (From line 2, Schedule B)			\$730,641.53

EXPENDITURES	
10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$15,001.32
11. Total cash expenditures (From line 4, Schedule A)	\$779,669.64
12. In kind expenditures (goods & services) (From line 1, Schedule B)	\$12,557.10
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....	\$792,226.74
14. Loan principal repayments made (From line 2, Schedule L).....	\$0.00
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....	\$807,228.06

CANDIDATES ONLY

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:
(360) 628-8129

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$951,720.84
<small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small>	
19. Liabilities: (Sum of loans and debts owed)	\$213,080.35
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$738,640.49

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		Heather Clarke	08/10/18

CASH RECEIPTS AND EXPENDITURE

SCHEDULE A
to C4
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/01/18 07/31/18

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
07/03/2018	\$58,531.31	07/26/2018	\$1,500,000.00			
07/13/2018	\$10,000.00					
07/16/2018	\$162,827.17					

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 **\$1,731,358.48**

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE
DEFINITIONS
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$45.00
07/26/18	DAN BRADY LAW PO Box 31318 Bellingham, WA 98228		DAN BRADY LAW, Legal fees.	\$3,500.00
07/26/18	THE CLARKE COMPANY LLC 3400 Capitol Blvd SE Suite 202 Tumwater, WA 98501		THE CLARKE COMPANY LLC, Compliance/accounting.	\$3,000.00
07/26/18	WINNER & MANDABACH CAMPAIGNS 100 Wilshire Blvd. Suite 2040 Santa Monica, CA 90401		WINNER & MANDABACH CAMPAIGNS, Campaign consulting.	\$17,250.00
07/26/18	PERI HALL & ASSOCIATES Box 486 Williamsburg, MA 01096		PERI HALL & ASSOCIATES, Campaign consulting.	\$9,575.00
07/26/18	MARK FUNK PUBLIC AFFAIRS 6526 18th Ave NE Seattle, WA 98115		MARK FUNK PUBLIC AFFAIRS, Public relations.	\$650.00
07/26/18	THE CLARKE COMPANY LLC 3400 Capitol Blvd SE Suite 202 Tumwater, WA 98501		THE CLARKE COMPANY LLC, Compliance/accounting.	\$1,250.00

Total from attached pages **\$ 744,399.64**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 **\$ 779,669.64**

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/01/18

07/31/18

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
07/26/18	WINNER & MANDABACH CAMPAIGNS 100 Wilshire Blvd. Suite 2040 Santa Monica, CA 90401		WINNER & MANDABACH CAMPAIGNS,Campaign consulting.	\$7,500.00
07/26/18	PERI HALL & ASSOCIATES Box 486 Williamsburg, MA 01096		PERI HALL & ASSOCIATES,Campaign consulting.	\$4,165.00
07/26/18	MARK FUNK PUBLIC AFFAIRS 6526 18th Ave NE Seattle, WA 98115		MARK FUNK PUBLIC AFFAIRS,Public relations.	\$675.00
07/16/18	AMPLIFIED STRATEGIES 4009 E Madison Street Seattle, WA 98112		AMPLIFIED STRATEGIES,Research.	\$75,238.00
07/16/18	MOORE INFORMATION 921 SW Washington, Suite 810 Portland, OR 97205		MOORE INFORMATION,Research.	\$93,150.00
07/26/18	DAN BRADY LAW PO Box 31318 Bellingham, WA 98228		DAN BRADY LAW,Legal.	\$3,500.00
07/26/18	THE CLARKE COMPANY LLC 3400 Capitol Blvd SE Suite 202 Tumwater, WA 98501		THE CLARKE COMPANY LLC,Compliance/accounting; PO Box fee (USPS); cell	\$5,771.36
07/26/18	MARK FUNK PUBLIC AFFAIRS 6526 18th Ave NE Seattle, WA 98115		MARK FUNK PUBLIC AFFAIRS,Public relations.	\$4,000.00
07/26/18	WINNER & MANDABACH CAMPAIGNS 100 Wilshire Blvd. Suite 2040 Santa Monica, CA 90401		WINNER & MANDABACH CAMPAIGNS,Campaign consulting.	\$65,250.00
07/26/18	PERI HALL & ASSOCIATES Box 486 Williamsburg, MA 01096		PERI HALL & ASSOCIATES,Campaign consulting.	\$36,260.00
07/26/18	AMPLIFIED STRATEGIES 4009 E Madison Street Seattle, WA 98112		AMPLIFIED STRATEGIES,Research.	\$70,112.00
07/26/18	THE CLARKE COMPANY LLC 3400 Capitol Blvd SE Suite 202 Tumwater, WA 98501		THE CLARKE COMPANY LLC,Compliance/accounting; cell phone (AT&T).	\$10,029.33

Page Total \$375,650.69

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/01/18

07/31/18

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
07/26/18	MOORE INFORMATION 921 SW Washington, Suite 810 Portland, OR 97205		MOORE INFORMATION, Research.	\$53,820.00
07/26/18	DAN BRADY LAW PO Box 31318 Bellingham, WA 98228		DAN BRADY LAW, Legal.	\$3,500.00
07/26/18	WINNER & MANDABACH CAMPAIGNS 100 Wilshire Blvd. Suite 2040 Santa Monica, CA 90401		WINNER & MANDABACH CAMPAIGNS, Campaign consulting.	\$50,000.00
07/26/18	PERI HALL & ASSOCIATES Box 486 Williamsburg, MA 01096		PERI HALL & ASSOCIATES, Campaign consulting.	\$30,000.00
07/26/18	MARK FUNK PUBLIC AFFAIRS 6526 18th Ave NE Seattle, WA 98115		MARK FUNK PUBLIC AFFAIRS, Public relations.	\$4,000.00
07/26/18	KESIN 77 Hillcrest Drive Florence, MA 01062		KESIN, Web/digital consulting.	\$8,500.00
07/26/18	BRECOURT STRATEGIES PO Box 1641 Woodinville, WA 98072		BRECOURT STRATEGIES, Web/digital consulting.	\$6,000.00
07/26/18	DENA DERR 30608 NE Stauffer Rd Camas, WA 98607		DENA DERR, Operations consulting.	\$9,500.00
07/26/18	R.L. STEINMAN & ASSOCIATES PO Box 322 Independence, MO 64051		R.L. STEINMAN & ASSOCIATES, Field consulting.	\$11,000.00
07/26/18	DANA BIEBER 9337 258th Avenue NE Redmond, WA 98053		DANA BIEBER, Media consulting.	\$10,221.35
07/26/18	BUCHHOLZ & ASSOCIATES, LLC 120 State Avenue NE #150 Olympia, WA 98501		BUCHHOLZ & ASSOCIATES, LLC, Field consulting.	\$9,827.60
07/26/18	SALIENTPOINT, LLC P.O. Box 960743 Boston, MA 02196		SALIENTPOINT, LLC, Research.	\$17,000.00

Page Total \$213,368.95

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/01/18

07/31/18

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
07/26/18	AMPLIFIED STRATEGIES 4009 E Madison Street Seattle, WA 98112		Mail.	\$154,548.00
07/16/18	BANK OF AMERICA 210 5th Avenue SW Olympia, WA 98501		Bank fees.	\$60.00
07/26/18	BANK OF AMERICA 210 5th Avenue SW Olympia, WA 98501		Bank fees.	\$210.00
07/27/18	STATE FARM INSURANCE One Lake Bellevue Drive, Suite Bellevue, WA 98005		Insurance.	\$562.00

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE
TO C4

B

(11/93)

6

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/01/18

07/31/18

1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
07/31/18	WESTERN STATES PETROLEUM 1415 L Street, STE 900 Sacramento, CA 95814	Staff time-meetings and conference calls.	\$7,348.85	\$27,390.42			
07/31/18	WESTERN STATES PETROLEUM 1415 L Street, STE 900 Sacramento, CA 95814	Meetings/conf- erence calls (subcontracto- r-Greg Hanon).	\$5,208.25	\$27,390.42			
TOTAL THIS PAGE				\$12,557.10			

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE
TO C4

B

(11/93)

7

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

07/01/18

07/31/18

2. PLEDGES RECEIVED BUT NOT YET PAID. List each pledge of more than \$100.00.

Date Notified of Pledge	Name and Address of Pledge Maker	Fair Market Value	Aggregate Total	P	R	G	E	N	If total over \$100, Employer Name, City, State, Occup.
04/25/18	BP 1201 "K" Street, Suite 1990 Sacramento, CA 95814	\$85,461.50	\$396,031.40						
04/25/18	CHEVRON CORPORATION 6001 Bollinger Canyon Road San Ramon, CA 94583	\$16,529.25	\$76,597.09						
04/25/18	PHILLIPS 66 601 Pennsylvania Avenue NW, Suite 1150N Washington, DC 20004	\$43,415.00	\$201,186.54						
04/25/18	SHELL OIL PRODUCTS, USA 3485 Pacheco Blvd. Martinez, CA 94533	\$56,826.50	\$56,826.50						
06/30/18	BP 1201 "K" Street, Suite 1990 Sacramento, CA 95814	\$310,569.90	\$396,031.40						
06/30/18	CHEVRON CORPORATION 6001 Bollinger Canyon Road San Ramon, CA 94583	\$60,067.84	\$76,597.09						
06/30/18	PHILLIPS 66 601 Pennsylvania Avenue NW, Suite 1150N Washington, DC 20004	\$157,771.54	\$201,186.54						
		TOTAL THIS PAGE	\$730,641.53						

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE
TO C4

B

(11/93)

8

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date
07/01/18 07/31/18

3. ORDERS PLACED, DEBTS, OBLIGATIONS. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)

Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code OR	Description of Obligation
05/31/2018	DAVIS WRIGHT TREMAINE LLP 1201 3rd Ave Seattle WA, 98101	1322.00		Legal.
06/30/2018	DAVIS WRIGHT TREMAINE LLP 1201 3rd Ave Seattle WA, 98101	6600.50		Legal.
07/06/2018	BASK DIGITAL MEDIA 225 Broadway, Suite 420 San Diego CA, 92101	1500.00		Design production.
07/15/2018	R.L. STEINMAN & ASSOCIATES PO Box 322 Independence MO, 64051	18736.42		Field consulting/office supplies (Target) & copies (Kinkos)
07/15/2018	KESIN 77 Hillcrest Drive Florence MA, 01062	8500.00		Web/digital consulting.
07/15/2018	DENA DERR 30608 NE Stauffer Rd Camas WA, 98607	12322.37		Operations consulting.
07/15/2018	BRECOURT STRATEGIES PO Box 1641 Woodinville WA, 98072	6500.00		Web/digital consulting.
07/15/2018	BUCHHOLZ & ASSOCIATES, LLC 120 State Avenue NE #150 Olympia WA, 98501	10775.82		Field consulting.
07/15/2018	DANA BIEBER 9337 258th Avenue NE Redmond WA, 98053	11359.99		Media consulting.
07/15/2018	THE CLARKE COMPANY LLC 3400 Capitol Blvd SE Suite 202 Tumwater WA, 98501	15040.40		Compliance/accounting ; cell phone (AT&T).
07/16/2018	PERI HALL & ASSOCIATES Box 486 Williamsburg MA, 01096	30000.00		Campaign consulting.
07/16/2018	WINNER & MANDABACH CAMPAIGNS 100 Wilshire Blvd. Suite 2040 Santa Monica CA, 90401	50000.00		Campaign consulting.
		TOTAL THIS PAGE		172657.50

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4

B

(11/93)

9

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date
07/01/18 07/31/18

3. ORDERS PLACED, DEBTS, OBLIGATIONS. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)

Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code OR	Description of Obligation
07/17/2018	SALIENTPOINT, LLC P.O. Box 960743 Boston MA, 02196	13245.06		Media consulting.
07/17/2018	DAN BRADY LAW PO Box 31318 Bellingham WA, 98228	3500.00		Legal.
07/31/2018	SALIENTPOINT, LLC P.O. Box 960743 Boston MA, 02196	10000.00		Research.
07/31/2018	MARK FUNK PUBLIC AFFAIRS 6526 18th Ave NE Seattle WA, 98115	6000.00		Public relations.
07/31/2018	CORT 1230 Andover Park E Tukwila WA, 98188	1994.44		Furniture rental.
07/31/2018	WALLACE SCOTT BELLEVUE I, LLC PO Box 4184 Bellevue WA, 98009	5683.35		Rent.
		TOTAL THIS PAGE		40422.85