

[Dan Brady](#) (Fri, 12 Oct at 12:00 PM)

Notified to : pdc@pdc.wa.gov

Ms. Blacksmith,

Attached is a response to Mr. Lazar's supplemental information regarding this matter, along with one supporting document. Thank you, and please contact me with any questions.

Dan Brady

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October 12, 2018

VIA EMAIL ONLY

Tabatha Blacksmith
Washington State Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

RE: PDC Case No. 40372, No on 1631

Dear Ms. Blacksmith:

I am replying on behalf of the No on 1631 Committee Sponsored by Western States Petroleum Association (the Committee) to your email of October 10, 2018 which forwards supplemental information from James Lazar regarding his original PDC complaint, Case No. 40372. Mr. Lazar contends that the Committee is "refusing" to provide what he believes is required information regarding the level of detail required for one expenditure with a direct mail vendor.

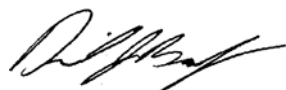
In the September 7, 2018 response to the original complaint, the Committee indicated that it believed that the level of detail Mr. Lazar was asking for was not required, as detailed in that response, and that remains the Committee's position. In that same response, the Committee indicated that if it was the PDC's opinion that the disclosure of the number of mail pieces ultimately produced and mailed is required, then the Committee was willing to disclose that information on the appropriate C4 filing.

On September 10, 2018, I spoke with PDC Communications and Outreach Director Kim Bradford regarding this matter. During that conversation, I reiterated the Committee's position that listing the number of mail pieces produced and mailed by a vendor in an expenditure report (C-4) was not required under the law. Ms. Bradford suggested that PDC staff believed such disclosure was required. While disagreeing on the interpretation of the law, I indicated that the Committee would amend its C-4 to reflect the detail requested by Ms. Bradford and would adhere to that standard going forward.

On September 12, 2018, the Committee filed C4 No. 100858770 (attached) which amended C4 No. 100851984 with the additional information requested (page 5). It would appear that Mr. Lazar failed to check the latest Committee filings on the PDC website before filing his supplemental information.

I hope you find this information useful. Please contact me if I can provide further information, and I look forward to your response.

Sincerely,



Dan Brady, WSBA #33731

**SUMMARY, FULL REPORT
 RECEIPTS AND
 EXPENDITURES**

C4
(3/97)

PDC OFFICE USE
 100858770
 AMENDS
 100851984
 09-12-2018

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 | *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?) |
| Report Period Covered 07/01/18 | From (last C-4) To (end of period) 07/31/18 | Final Report? Yes No X | |

RECEIPTS

| | | |
|--|----|---------------------|
| 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 |
| 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 | 09/12/18 |

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4 **A**
(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

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 | | | |
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| TOTAL THIS PAGE | | | \$12,557.10 | | | | |

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 | | |

