



**STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

**BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON**

In the Matter of Enforcement Action
Against

Spokane for Honest Government
Respondent.

PDC Case 9059

Amended Notice of
Administrative Charges

I. JURISDICTION

The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure laws; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and Addendum to the Report of Investigation and all related exhibits by reference.

II. ALLEGATIONS

PDC staff alleges that Spokane for Honest Government violated RCW 42.17A.260 and .305 by failing to timely file C-6 reports of independent expenditures and electioneering communications within 24 hours of presenting or mailing the ads and communications to the public. The late-reported C-6 reports totaled \$94,134.75 and were reported between 212 and 283 days late. PDC staff also alleges that Spokane for Honest Government violated RCW 42.17A.240 by failing to adequately describe the purpose of expenditures for media buys, as required by RCW 42.17A.240 and WAC 390-16-037. The expenditures without an adequate description totaled \$50,000.

III. FACTS

1. Spokane for Honest Government is a political committee that participated in the 2015 Spokane City Council elections by supporting Lori Kinnear and Karen Stratton with independent expenditures and electioneering communications. Both candidates were successful in the November 3, 2015 general election.
2. On October 15, 2016, Gretchen McDevitt filed a complaint, alleging that Spokane for Honest Government had failed to timely file reports of independent expenditures during the 2015 Spokane City Council elections.
3. Spokane for Honest Government first filed a committee registration (Form C-1pc) on May 1, 2015, listing Deborah Gaddess, Campaign Manager; Melissa Olson, Treasurer; and Rich Bruce, Renee Barkart, and Randy Marler, Committee Members.

Spokane for Honest Government C-6 and C-4 Reports

4. On October 16, 2015, Spokane for Honest Government paid Lawton Printing \$2,938.00 for mailers supporting Karen Stratton for Spokane City Council. On October 22, 2015, Spokane for Honest Government paid Lawton Printing \$2,512.16 for mailers supporting Lori Kinnear. On October 27, 2015, Spokane for Honest Government paid Lawton Printing \$4,992.30 for mailers supporting Lori Kinnear (\$2,598.15) and Karen Stratton (\$2,394.15). Melissa Olson, Treasurer for Spokane for Honest Government, filed all three C-6 reports in a timely manner, within 24 hours of presenting or mailing the ads and communications to the public.
5. On June 20, 2016, Spokane for Honest Government filed a C-6 report disclosing multiple independent expenditures and electioneering communications supporting Lori Kinnear and Karen Stratton, totaling \$94,134.75. The report disclosed \$46,080.40 supporting Ms. Kinnear and \$48,054.35 supporting Ms. Stratton. The expenditures were required to be reported on seven separate C-6 reports within 24

hours of presenting or mailing the ads and communications to the public, but were reported between 212 and 283 days late on June 20, 2016. The expenditures were primarily for political ads in the form of broadcast advertising and direct mail pieces.

6. Spokane for Honest Government disclosed spending \$104,577.21 on C-6 reports for independent expenditures and electioneering communications in support of candidates Linnear and Stratton. Support for Lori Kinnear totaled \$51,190.71 and support for Karen Stratton totaled \$53,386.50. Of this amount, \$94,134.75 was reported on C-6 reports between 212 and 283 days late, and more than seven months after the 2015 election.
7. Spokane for Honest Government timely filed a Campaign Summary Receipts and Expenditures Report (PDC Form C-4) covering the period September 1, 2015 through October 12, 2015 (the 21-day pre-general election report) on October 12, 2015. It included an expenditure dated September 10, 2015 totaling \$50,000, to API, PO Box 251, Spokane, WA 99210. The Purpose of Expense column stated only "Media Buy." It did not identify the two candidates supported by the media buy, or include a listing of the media outlets used, as required by RCW 42.17A.240(6) and WAC 390-16-037.

IV. LAW

RCW 42.17A.260 requires the sponsor of political advertising supporting or opposing a candidate or ballot proposition that qualifies as an independent expenditure with a fair market value of one thousand dollars or more, and that is sponsored within twenty-one days of an election, to deliver, either electronically or in written form, a special report to the commission within twenty-four hours of, or on the first working day after, the date the political advertising is first published, mailed, or otherwise presented to the public.

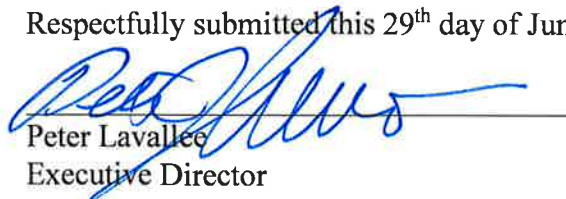
RCW 42.17A.305 requires the sponsor of an electioneering communication to report to the commission within twenty-four hours of, or on the first working day after, the date the electioneering communication is broadcast, transmitted, mailed, erected, distributed, or otherwise published, and include: (a) Name and address of the sponsor; (b) Source of funds for the communication, (c) Name and address of the person to whom an electioneering communication related expenditure was made; (d) A detailed description of each expenditure of more than one hundred dollars; and (e) The date the expenditure was

made and the date the electioneering communication was first broadcast, transmitted, mailed, erected, distributed, or otherwise published.

RCW 42.17A.240 specifies the required content for reporting expenditures on C-4 reports. Subsection (6) states that the report shall disclose the following: "The name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure, and the total sum of all expenditures;"

WAC 390-16-037 states that any person required to report the "purpose" of an expenditure under RCW 42.17A.240(6) shall identify any candidate(s) or ballot proposition(s) that are supported or opposed by the expenditure unless such candidate(s) or ballot proposition(s) have been previously identified in a statement of organization of the person required to be filed under RCW **42.17A.205** (2)(f) and (g). In addition, WAC 390-16-037 requires the expenditure descriptions for broadcast political advertisements to include the following details: Vendor Name; Purpose, to include the name of the media outlet, the amount paid for each media outlet; and the total expenditure amount.

Respectfully submitted this 29th day of June, 2017.



Peter Lavalley
Executive Director



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PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17 and RCW 42.17A

Spokane for Honest Government

Respondent.

PDC Case 9059

Addendum to
Report of Investigation

I. BACKGROUND

- 1.1 Spokane for Honest Government is a political committee that participated in the 2015 Spokane City Council elections by supporting Lori Kinnear and Karen Stratton with independent expenditures and electioneering communications. Both candidates were successful in the November 3, 2015 general election.
- 1.2 Spokane for Honest Government spent \$104,577.21 sponsoring independent expenditures and electioneering communications, and received most of its funding from two political committees associated with the Spokane Firefighters Union, Safest City Spokane and Spokane Firefighters Union PAC.
- 1.3 On October 15, 2016, Gretchen McDevitt filed a complaint, alleging that Spokane for Honest Government had failed to timely file reports of independent expenditures during the 2015 Spokane City Council elections.
- 1.4 After completing the Report of Investigation dated June 12, 2017, and sending it to Respondent Spokane for Honest Government with a Notice of Administrative Charges, staff concluded that the Report of Investigation should be supplemented with information about a large expenditure described on Schedule A to Form C-4 as a "Media Buy."

II. ADDITIONAL FINDINGS

Spokane for Honest Government C-4 Report

- 2.1 Spokane for Honest Government timely filed a Campaign Summary Receipts and Expenditures Report (PDC Form C-4) covering the period September 1, 2015 through October 12, 2015 (the 21-day pre-general election report) on October 12, 2015. It included an expenditure dated September 10, 2015 totaling \$50,000, to API, PO Box 251, Spokane, WA 99210. The Purpose of Expense column stated only "Media Buy." It did not identify the two candidates supported by the media buy, or

include a listing of the media outlets used, as required by RCW 42.17A.240(6) and WAC 390-16-037. (**Addendum Exhibit 1**)

III. SCOPE

4.1 PDC staff reviewed the following documents:

1. The C-4 reports filed by Spokane for Honest Government;

IV. LAW

RCW 42.17A.240 specifies the required content for reporting expenditures on C-4 reports. Subsection (6) states that the report shall disclose the following: "The name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure, and the total sum of all expenditures;"

WAC 390-16-037 states that any person required to report the "purpose" of an expenditure under RCW 42.17A.240(6) shall identify any candidate(s) or ballot proposition(s) that are supported or opposed by the expenditure unless such candidate(s) or ballot proposition(s) have been previously identified in a statement of organization of the person required to be filed under RCW **42.17A.205** (2)(f) and (g). In addition, WAC 390-16-037 requires the expenditure descriptions for broadcast political advertisements to include the following details: Vendor Name; Purpose, to include the name of the media outlet, the amount paid for each media outlet; and the total expenditure amount.

Respectfully submitted this 29th day of June, 2017.



Philip E. Stutzman
Sr. Compliance Officer

EXHIBIT LIST

Addendum Exhibit 1 - 21-day pre-general election C-4 report covering period
September 1, 2015 – October 12, 2015



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
100661163
10-12-2015

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

Spokane for Honest Government

Mailing Address

P O box 18302

City

Spokane, WA

Zip + 4

99228

Office Sought (Candidates)

Election Date

2015

***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

From (last C-4)

To (end of period)

Final Report?

Yes X No

09/01/15

10/12/15

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)		\$	6,950.00
2. Cash received (From line 2, Schedule A)		\$	81,800.00
3. In kind contributions received (From line 1, Schedule B)			473.91
4. Total cash and in kind contributions received this period (Line 2 plus 3)			82,273.91
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)			89,223.91
9. Total pledge payments due (From line 2, Schedule B)	0.00		

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)			801.92
11. Total cash expenditures (From line 4, Schedule A)			67,495.00
12. In kind expenditures (goods & services) (From line 1, Schedule B)			473.91
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)			67,968.91
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)			68,770.83

CANDIDATES ONLY

Won Lost Unopposed Name not on ballot

Primary election ☐ ☐ ☐ ☐
General election ☐ ☐ ☐ ☐

Treasurer's Daytime Telephone No.:

(509) 216-8578

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17) [Line 18 should equal your bank account balance(s) plus your petty cash balance.]	20,453.08
19. Liabilities: (Sum of loans and debts owed)	0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	20,453.08

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

Melissa Olson

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

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

Report Date

09/01/15

10/12/15

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
09/08/2015	45,000.00	10/10/2015	15,000.00			
09/21/2015	20,000.00					
10/03/2015	1,800.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 81,800.00

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
09/10/15	API P O Box 251 Spokane, WA 99210		Media Buy	50,000.00
09/21/15	EMC RESEARCH 720 3rd Ave Ste. 1110 Seattle, WA 98104		phone surveys	9,200.00
09/21/15	EMC RESEARCH 720 3rd Ave Ste. 1110 Seattle, WA 98104		Phone surveyys	7,900.00
10/03/15	WIN/WIN ACTION 1402 3rd Ave ste 201 Seattle, WA 98101		Office rental for phone surveys	350.00

Total from attached pages \$ 0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ 67,495.00

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE
TO C4

B

(11/93)

3

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

Report Date

09/01/15 10/12/15

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
09/21/15	ANNE MARTIN 510 S Elm St Ste 1 Spokane , WA 99201	Writing phone bank script	84.60	437.10			
09/22/15	JIM DAWSON 1402 Third Avenue #406 Seattle , WA 98101	Editing phone script	36.81	36.81			
09/23/15	ANNE MARTIN 510 S Elm St Ste 1 Spokane , WA 99201	8 station phone bank	126.90	437.10			
09/25/15	ANNE MARTIN 510 S Elm St Ste 1 Spokane , WA 99201	Phone bank coordination	42.30	437.10			
09/28/15	ANNE MARTIN 510 S Elm St Ste 1 Spokane , WA 99201	Phone bank coordination	28.20	437.10			
09/29/15	ANNE MARTIN 510 S Elm St Ste 1 Spokane , WA 99201	Phone bank coordination	70.50	437.10			
10/01/15	ANNE MARTIN 510 S Elm St Ste 1 Spokane , WA 99201	Writing phone bank script and phone bank coordination	84.60	437.10			
TOTAL THIS PAGE			473.91				



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In RE COMPLIANCE WITH
RCW 42.17 and RCW 42.17A

Spokane for Honest Government

Respondent.

PDC Case 9059

Report of Investigation

I. BACKGROUND

- 1.1 Spokane for Honest Government is a political committee that participated in the 2015 Spokane City Council elections by supporting Lori Kinnear and Karen Stratton with independent expenditures and electioneering communications. Both candidates were successful in the November 3, 2015 general election.
- 1.2 Spokane for Honest Government spent \$104,577.21 sponsoring independent expenditures and electioneering communications, and received most of its funding from two political committees associated with the Spokane Firefighters Union, Safest City Spokane and Spokane Firefighters Union PAC.
- 1.3 On October 15, 2016, Gretchen McDevitt filed a complaint, alleging that Spokane for Honest Government had failed to timely file reports of independent expenditures during the 2015 Spokane City Council elections. **(Exhibit 1)** The complaint also made allegations against Spokane Firefighters Union PAC, Safest City Spokane, and officials of the City of Spokane Fire Department. These allegations are being investigated under separate cases.

II. ALLEGATIONS IN COMPLAINT

- 2.1 In her October 15, 2016 complaint, Ms. McDevitt alleged that Spokane for Honest Government raised \$106,358.64 and spent \$106,332.77 supporting two candidates during the 2015 Spokane City Council elections, but failed to timely file most of their independent expenditures on C-6 reports. She alleged that Melissa Olson, Treasurer for Spokane for Honest Government, filed the missing C-6 reports on June 20, 2016 after the committee was contacted by Jami Lund of The Freedom Foundation. Ms. McDevitt included a copy of the late-filed C-6 report with her complaint.

III. FINDINGS

- 3.1 Spokane for Honest Government first filed a committee registration (Form C-1pc) on May 1, 2015, listing Deborah Gaddess, Campaign Manager; Melissa Olson, Treasurer; and Rich Bruce, Renee Barkart, and Randy Marler, Committee Members. Spokane for Honest Government filed an amended C-1pc on July 12, 2016, listing Randy Marler, Campaign Manager and Director; Brandon Bacon, Treasurer; and Rich Bruce, Renee Barkart, and Deborah Gaddess, Committee Members. On March 13, 2017, Spokane for Honest Government updated its committee registration, again listing Randy Marler, Campaign Manager; Brandon Bacon, Treasurer; and Rich Bruce, Renee Barkart, and Deborah Gaddess, Committee Members. **(Exhibit 2)**
- 3.2 Spokane for Honest Government participated in the 2015 Spokane City Council elections by sponsoring independent expenditures and electioneering communications totaling \$104,577.21 that supported two candidates, Lori Kinnear and Karen Stratton. Ms. Kinnear was elected to the Council on November 3, 2015, and Ms. Stratton was elected in 2015 after having been appointed in September 2014 to complete the unexpired term of a councilmember who left office in 2014.
- 3.3 Spokane for Honest Government received most of its funding from Safest City Spokane, a political committee formed by IAFF Local 29 in 2014, and Spokane Firefighters Union PAC, a committee formed by the Spokane Firefighters Union that has been reporting to the PDC since at least 1996. Spokane for Honest Government also received funding from the Spokane Firefighters Union, IAFF Local 29, from state and regional labor organizations, and from the Spokane Tribe of Indians. Safest City Spokane and Spokane Firefighters Union PAC received their funding from individual firefighters and from the Spokane Firefighters Union, IAFF Local 29.

Response on behalf of Spokane for Honest Government

- 3.4 In Randy Marler's October 15, 2016 response, he stated that the failure to timely file C-6 reports of independent expenditures was brought to their attention by The Freedom Foundation and "was simply a failure of training for the PAC treasurer last year." He said all the committee's contributions and expenditures "were filed with the PDC but were simply not done correctly." **(Exhibit 3)**
- 3.5 Mr. Marler said once Melissa Olson, the committee's Treasurer during the 2015 elections, became aware of the C-6 reporting issue because of the inquiry made by The Freedom Foundation, she worked with the PDC to file the missing reports on June 20, 2016. He said Ms. Olson took all the PDC training classes available for treasurers during 2015, however, none of the classes addressed filing C-6 reports.
- 3.6 Mr. Marler said Ms. Olson resigned her Treasurer position after filing the combined C-6 report on June 20, 2016, and when the complaint was received in October 2016, the new Treasurer, Brendon Bacon, reached out to the PDC to confirm that the late reporting issue had been resolved. Mr. Marler stated that it is the position of Spokane for Honest Government that the reporting issue has been properly resolved.

Spokane for Honest Government C-6 and C-4 Reports

- 3.7 On October 16, 2015, Spokane for Honest Government paid Lawton Printing \$2,938.00 for mailers supporting Karen Stratton for Spokane City Council. Ms. Olson timely filed a C-6 report within 24 hours, on October 16, 2015. **(Exhibit 4)**
- 3.8 On October 22, 2015, Spokane for Honest Government paid Lawton Printing \$2,512.16 for mailers supporting Lori Kinnear. Ms. Olson timely filed a C-6 report within 24 hours on October 22, 2015. **(Exhibit 5)**
- 3.9 On October 27, 2015, Spokane for Honest Government paid Lawton Printing \$4,992.30 for mailers supporting Lori Kinnear (\$2,598.15) and Karen Stratton (\$2,394.15), and Ms. Olson timely filed a C-6 on October 27, 2015. **(Exhibit 6)**
- 3.10 On June 20, 2016, Spokane for Honest Government filed a C-6 report showing multiple independent expenditures and electioneering communications supporting Lori Kinnear and Karen Stratton, totaling \$94,134.75. The report showed \$46,080.40 supporting Ms. Kinnear and \$48,054.35 supporting Ms. Stratton. The expenditures were required to be reported on seven separate C-6 reports within 24 hours of being presented to the public, but were reported between 212 and 283 days late on June 20, 2016. The expenditures were primarily for political ads in the form of broadcast advertising and direct mail pieces. **(Exhibit 7)**
- 3.11 Staff reviewed whether the C-4 reports filed by Spokane for Honest Government were filed close to the due date for the missing C-6 reports, and whether the C-4 reports identified the candidates supported by the independent expenditures and electioneering communications. Staff found that for two expenditures, each for \$1,475.00, listed on the C-6 filed June 20, 2016, Spokane for Honest Government filed a C-4 report within three days of the due date for the C-6, and identified the candidates supported on the C-4 report. The C-6 was due 10/23/15, and the C-4 was filed 10/26/16. For a third expenditure totaling \$6,104.48, also required to be reported on a C-6 by 10/23/15, a C-4 was filed within three days, by 10/26/15, but the C-4 did not identify the candidates supported. **(Exhibit 7)**
- 3.12 Spokane for Honest Government disclosed spending \$104,577.21 on C-6 reports for independent expenditures and electioneering communications in support of candidates Linnear and Stratton. Support for Lori Kinnear totaled \$51,190.71 and support for Karen Stratton totaled \$53,386.50. Of this amount, \$94,134.75 was reported on C-6 reports between 212 and 283 days late. Exhibit 8 summarizes the C-6 reporting and whether candidates supported were identified on C-4 reports. **(Exhibit 8)**

IV. SCOPE

4.1 PDC staff reviewed the following documents:

1. A complaint against Spokane for Honest Government, received from Gretchen McDevitt on October 15, 2016;

2. A response to the complaint submitted by Randy Marler on October 25, 2016 on behalf of Spokane for Honest Government;
3. Committee Registrations (Form C-1pc) filed by Spokane for Honest Government in 2015, 2016, and 2017;
4. C-3, C-4, and C-6 reports filed by Spokane for Honest Government during and following the 2015 Spokane City Council elections;

V. LAW

RCW 42.17A.260 requires the sponsor of political advertising supporting or opposing a candidate or ballot proposition that qualifies as an independent expenditure with a fair market value of one thousand dollars or more, and that is sponsored within twenty-one days of an election, to deliver, either electronically or in written form, a special report to the commission within twenty-four hours of, or on the first working day after, the date the political advertising is first published, mailed, or otherwise presented to the public.

RCW 42.17A.305 requires the sponsor of an electioneering communication to report to the commission within twenty-four hours of, or on the first working day after, the date the electioneering communication is broadcast, transmitted, mailed, erected, distributed, or otherwise published, and include: (a) Name and address of the sponsor; (b) Source of funds for the communication, (c) Name and address of the person to whom an electioneering communication related expenditure was made; (d) A detailed description of each expenditure of more than one hundred dollars; and (e) The date the expenditure was made and the date the electioneering communication was first broadcast, transmitted, mailed, erected, distributed, or otherwise published.

RCW 42.17A.005(26) "Independent expenditure" means an expenditure that has each of the following elements:

(a) It is made in support of or in opposition to a candidate for office by a person who is not (i) a candidate for that office, (ii) an authorized committee of that candidate for that office, (iii) a person who has received the candidate's encouragement or approval to make the expenditure, if the expenditure pays in whole or in part for political advertising supporting that candidate or promoting the defeat of any other candidate or candidates for that office, or (iv) a person with whom the candidate has collaborated for the purpose of making the expenditure, if the expenditure pays in whole or in part for political advertising supporting that candidate or promoting the defeat of any other candidate or candidates for that office;

(b) The expenditure pays in whole or in part for political advertising that either specifically names the candidate supported or opposed, or clearly and beyond any doubt identifies the candidate without using the candidate's name; and

(c) The expenditure, alone or in conjunction with another expenditure or other expenditures of the same person in support of or opposition to that candidate, has a value of *eight hundred dollars or more (*\$1,000 in 2016 revision). A series of expenditures, each of which is under eight hundred dollars, constitutes one independent expenditure if their cumulative value is eight hundred dollars or more.

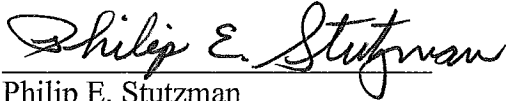
RCW 42.17A.005(19)(a) "Electioneering communication" means any broadcast, cable, or satellite television or radio transmission, United States postal service mailing, billboard, newspaper, or periodical that:

(i) Clearly identifies a candidate for a state, local, or judicial office either by specifically naming the candidate, or identifying the candidate without using the candidate's name;

(ii) Is broadcast, transmitted, mailed, erected, distributed, or otherwise published within sixty days before any election for that office in the jurisdiction in which the candidate is seeking election; and

(iii) Either alone, or in combination with one or more communications identifying the candidate by the same sponsor during the sixty days before an election, has a fair market value of one thousand dollars or more.

Respectfully submitted this 12th day of June, 2017.



Philip E. Stutzman
Sr. Compliance Officer

EXHIBIT LIST

- | | |
|------------------|---|
| Exhibit 1 | A complaint against Spokane for Honest Government received from Gretchen McDevitt on October 15, 2016. |
| Exhibit 2 | C-1pc Filed by Spokane for Honest Government on 5/1/15 |
| Exhibit 3 | A response to the complaint submitted by Randy Marler on October 25, 2016 on behalf of Spokane for Honest Government. |
| Exhibit 4 | C-6 Filed October 16, 2015. |
| Exhibit 5 | C-6 Filed October 22, 2015. |
| Exhibit 6 | C-6 Filed October 27, 2015. |
| Exhibit 7 | C-6 Filed June 20, 2016. |
| Exhibit 8 | Spreadsheet showing late-filed C-6 Reports of Independent Expenditures and Electioneering Communications. |

File a Formal Complaint - Gretchen McDevitt

Mcdevitt reported 5 days ago (Sat, 15 Oct at 11:43 AM) via Portal Meta

In the 2015 election cycle there appear to be some irregularities or violations committed by Spokane for Honest Government (SFHG) and others contributing to SFHG. Details are in the attached complaint. There should be two attached files. Please let me know if you do not get them. The PDC Complaint file is 4 pages.

2 Attachments

DOCX [PDC Complain...](#)
(24.1 KB)

DOCX [Exhibit 1A S...](#)
(4.39 MB)

PDC Complaint

10/14/16

According to the PDC website, "The PDC was designed to make government more transparent...The PDC is the lens through which the public can see who is attempting to influence elected officials by financing their campaigns and by lobbying them." Elsewhere it says: "Forty three years ago, Washington voters created the Public Disclosure Commission for the purpose of bringing transparency to the field of state and local campaign financing. While the mission remains the same, new challenges persist. The amount spent in each successive election cycle grows. Independent expenditures have expanded, and, in some cases exceed the candidates' expenditures...All of these developments serve to demonstrate that the PDC's roles in enforcing the campaign finance laws and protecting the public's right to know are more important than ever."

In the 2015 election cycle there appear to be some irregularities and violations committed by Spokane for Honest Government (SFHG) and some organizations contributing to SFHG that have impeded this transparency. It is especially a concern since the situation involves expenditures by SFHG to benefit certain Spokane City Council candidates and oppose others. About 2/3 of SFHG funds have come from the Firefighters' Union and two firefighter PACs. It is the Spokane City Council that approves the contract with the Firefighters Union, IAFF Local 29, so it seems especially important that campaign laws are strictly followed and in a timely manner.

Respondents:

1. Spokane for Honest Government

Deborah Gaddass, Campaign Manager
PO Box 18302
Spokane, WA 99228
(509) 939-7161

Melissa Olson, Treasurer
PO Box 18302
Spokane, WA 99228
(509) 216-8578
Spokaneforhonestgovernment@gmail.com

2. Spokane Firefighters Union Local 29

Don Waller, President
911 E. Baldwin
Spokane, WA 99207
(509) 991-6959
PresidentIAFFL29@gmail.com
(509) 484-5598
IAFFL29@gmail.com

3. Spokane Firefighters Union PAC

Don Waller, Campaign Manager
Thad Frater, Treasurer
911 E. Baldwin
Spokane, WA 99207
(509) 484-5598
info@local29.org

4. Safest City Spokane

Don Waller, Campaign Manager
Thad Frater, Treasurer
911 E. Baldwin
Spokane, WA 99207
(509) 484-5598
IAFFL29@gmail.com

Alleged Violations:

Violation One: (Alleged violation of RCW 42.17A.255, .260 & .305) For the 2015 election Spokane for Honest Government (SFHG) raised \$106,358.64 and spent \$106,332.77. Yet they failed to report most of their independent expenditures (IE) of \$94,143.75 in support of two Spokane City Council candidates in a timely manner. In fact, it was not until 6/20/16, only after a contact was made by Jami Lund, My Freedom Foundation, to the PDC on 5/26/16 asking about this issue, that Melissa Olson, Treasurer SFHG, filed a PDC report, C6, listing IE of \$46,080.40 and \$48,054.35 in support of Lori Kinnear and Karen Stratton, respectively, for the 2015 election.

Prior to 6/20/16 they had only reported IE on behalf of Lori Kinnear (and in opposition to LaVerne Biel) of \$5,110.31 and Karen Stratton (and in opposition to Evan Verduin) of \$5,332.15.

Here is a copy of the IE of Spokane for Honest Government for 2015 and updated on 6/20/16:

REPORT	NAME	SPONSOR	DATE	AMOUNT	S/O	CITY	STATE	ZIP
Report	STRATTON KAREN	SPOKANE FOR HONEST GOVERNMENT	6/20/2016	\$48,054.35	SPT	SPOKANE	WA	99208
Report	KINNEAR LORI	SPOKANE FOR HONEST GOVERNMENT	6/20/2016	\$46,080.40	SPT	SPOKANE	WA	99208
Report	STRATTON KAREN	SPOKANE FOR HONEST GOVERNMENT	10/22/2015	\$2,938.00	SPT	SPOKANE	WA	99208
Report	KINNEAR LORI	SPOKANE FOR HONEST GOVERNMENT	10/27/2015	\$2,598.15	SPT	SPOKANE	WA	99208
Report	KINNEAR LORI	SPOKANE FOR HONEST GOVERNMENT	10/22/2015	\$2,512.16	SPT	SPOKANE	WA	99208
Report	STRATTON KAREN	SPOKANE FOR HONEST GOVERNMENT	10/27/2015	\$2,394.15	SPT	SPOKANE	WA	99208

Violation Two: (Possible violation of RCW 42.17A.475 & .495) The City of Spokane has been withholding funds from employees' wages that the Spokane Firefighters' Union, IAFF Local 29 has used as political contributions without the written request of the employee.

Several transfers of funds have been designed to mask the fact that employees of the City of Spokane have, in effect, contributed funds to City Councilmembers without authorization. This has been accomplished by transferring funds from the Spokane Firefighters Union general fund to various PACs.

1. Spokane for Honest Government received \$21,950 from the union. PDC site with contributions received by SFHG, <http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/contributions?param=U1BPS0hHIDlyOA====&year=2015&type=continuing>,

The site also shows that Safest City Spokane transferred \$45,000 total to the PAC, Spokane for Honest Government.

2. Spokane Firefighters Union (IAFF Local 29) PAC, received \$9,600 from the union. It transferred \$8,700 to Spokane for Honest Government.

<http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=U1BPS0YgIDlwNw%3D%3D%3D%3D&year=2015&type=continuing>

(Note: SFHG only reported donations of \$6,700. See **Violation Six** below.)

Violation Three: (Possible violation of RCW 42.17A.400, .405 & .460) The careful transfer of funds from payroll deductions, to the union, to Spokane Firefighters Union PAC and Safest City Spokane (IAFF Local 29) PAC to the union directed 2015 PAC, Spokane for Honest Government, for use in independent expenditures would be an earmarking of funds to circumvent campaign laws including campaign contribution limits.

Violation Four: (Possible violation of RCW 42.17A.555) The appearance of Spokane Firefighters in firefighter attire describing themselves as city of "Spokane Firefighters" is a use of public facilities on behalf of a political campaign in violation of laws prohibiting public resources from being used for political purposes. **Exhibit 1A** (SFHB TV ads Kinnear, Stratton) includes links to the TV ads for Kinnear and Stratton:

<https://youtu.be/7f2E6rocahY>; <https://youtu.be/dxNqAsVG5tA>;

Violation Five: (Alleged violation of RCW 452.17A.240) On the C3 form, the Spokane Firefighters Union PAC, <https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100636007> and Safest City Spokane IAFF 29, <https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100647379>, have not listed the actual addresses of the individual contributors. Instead they have listed the union's address, 911 E. Baldwin, Spokane, WA 99207, for each contributor. The union's address is also listed for the Campaign Manager and Treasurer.

Violation Six: (Alleged violation of RCW 42.17A.220 &.225) According to the Spokane Firefighters Union Pac, a \$2,000 contribution, <http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=U1BPS0YgIDlwNw%3D%3D%3D%3D&year=2015&type=continuing>, was made to Spokane for Honest Government on 4/28/15. However, SFHG has not listed any contribution of \$2,000 from Spokane Firefighters PAC, <http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/contributions?param=U1BPS0hHIDlyOA%3D%3D%3D%3D&year=2015&type=continuing> (or from IAFF Local 29 PAC which appears to be another name for Spokane Firefighters Union PAC).

Violation 7: Minor issues

On the C6 form for Spokane for Honest Government, <https://web.pdc.wa.gov/rptimg/default.aspx?docid=4581495>, the Party for Kinnear and Stratton is listed as Democrat. However, city council races are non-partisan so that term should be used instead.

Expenditures C6 for Spokane for Honest Government, lists the expenses for mailers of \$2,938 and \$2,512.16 paid to Lawton Printing, <https://web.pdc.wa.gov/rptimg/default.aspx?docid=4529502>, but on the expenditures page, <http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=U1BPS0hHIDlyOA%3D%3D%3D%3D&year=2015&type=continuing>, it lists the vendor for both as USPS.

Finally, probably not violations but just want to make sure: Variation in names for the same PAC is confusing and hinders transparency. Is there any requirement for consistency?

Spokane Firefighters Union PAC is on the C1 report but on the report for listing contributions the Spokane for Honest Government lists the *Spokane Firefighters Union PAC* as *IAFF Local 29 PAC*.

Safest City Spokane on C1 is also referred to as *Local 29 Safest City PAC*.

Then, *Spokane Firefighters Union* is just referred to as *Local 29* by Spokane for Honest Government.

Also, Safest City Spokane, IAFF Local 29 PAC and Spokane Firefighters Union PAC are both firefighter PACs getting contributions mostly from individual firefighters and a couple from the union. Both have the same Campaign Manager, Don Waller, and same Treasurer, Thad Frater, according to their C1. Does having two such PACs comply with PDC rules?



Search





**Special Interest
Backed**


**Opposed
To Safety
Improvements**

LaVerne Biel

Lori Kinnear For Spokane City Council



Spokane Firefighters Union Local 29

12

141 views

Up Next

Autoplay 



2407 Spokane Washington
JBG TRAVELS
3,194 views



Lori Kinnear For Spokane City Council



Spokane Firefighters Union Local 29

Subscribe 12

141 views

Up Next

Autoplay



SPOKANE, WASHINGTON | Food Tour with Olivia Hope
Tourist to Local
672 views

<https://youtu.be/7f2E6rocahY>

Published on Oct 17, 2015
Ad for Lori Kinnear for Spokane City Council

Advertisement #2



Search





SPOKESMAN-REVIEW

"(Verduin) views the position
as half time"

-Spokesman-Review 7-21-15

Karen Stratton For Spokane City Council



Spokane Firefighters Union Local 29



12

364 views

Up Next



Spokane Fire Department 2012
Year in Review Video

spokanefire
5,974 views

Autoplay 



Karen Stratton For Spokane City Council



Spokane Firefighters Union Local 29



364 views

Up Next

Autoplay




Spokane Fire Department 2012 Year in Review Video

spokanefire
5,974 views

<https://youtu.be/dxNqAsVG5tA>

Published on Oct 17, 2015

RECEIVED

PUBLIC DISCLOSURE COMMISSION  711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 Toll Free 1-877-601-2828		Political Committee Registration		C1PC (1/12)	MAY -1 2015 Public Disclosure Commission
Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.) Spokane For Honest Government				Acronym:	
Mailing Address P.O. Box 18302				Telephone: (509) 216-8578	
City Spokane		County Spokane		Zip +4 99228	
E-mail: SpokaneForHonestGovernment@gmail.com				Fax: ()	
NEW OR AMENDED REGISTRATION? <input checked="" type="checkbox"/> NEW. Complete entire form. <input type="checkbox"/> AMENDS previous report. Complete entire form.			COMMITTEE STATUS <input checked="" type="checkbox"/> Continuing (On-going; not established in anticipation of any particular campaign election.) <input type="checkbox"/> election year only. Date of general or special election: _____ (Year)		
1. What is the purpose or description of the committee? <input type="checkbox"/> Bona Fide Political Party Committee - official state or county central committee or legislative district committee. If you are not supporting the entire party ticket, attach a list of the names of the candidates you support.					
<input type="checkbox"/> Ballot Committee - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure:				Ballot Number FOR <input type="checkbox"/> AGAINST <input type="checkbox"/>	
<input checked="" type="checkbox"/> Other Political Committee - PAC, caucus committee, political club, etc. If committee is related or affiliated with a business, association, union or similar entity, specify name:					
For single election-year only committees (not continuing committees): Is the committee supporting or opposing (a) one or more candidates? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, attach a list of each candidate's name, office sought and political party affiliation. (b) the entire ticket of a political party? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, identify the party:					
2. Related or affiliated committees. List name, address and relationship. <input type="checkbox"/> Continued on attached sheet.					
3. How much do you plan to spend during this entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. (If your committee status is continuing, estimate spending on a calendar year basis.) If no box is checked you are obligated to use Full Reporting. See instruction manuals for information about reports required and changing reporting options. <input type="checkbox"/> MINI REPORTING Mini Reporting is selected. No more than \$5,000 will be raised or spent and no more than \$500 in the aggregate will be accepted from any one contributor. <input checked="" type="checkbox"/> FULL REPORTING Full Reporting is selected. The frequent, detailed campaign reports mandated by law will be filed as required.					
4. Campaign Manager's or Media Contact's Name and Address Deborah Gaddess P.O. Box 18302 Spokane, WA 99228				Telephone Number: (509) 939-7161	
5. Treasurer's Name and Address. Does treasurer perform only ministerial functions? Yes <input type="checkbox"/> No <input type="checkbox"/> See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet. <input type="checkbox"/> Continued on attached sheet. Melissa Olson P.O. Box 18302 Spokane, WA 99228				Daytime Telephone Number: (509) 216-8578	
6. Persons who perform only ministerial functions on behalf of this committee and on behalf of candidates or other political committees. List name, title, and address of these persons. See WAC 390-05-243 and next page for details. <input type="checkbox"/> Continued on attached sheet. N/A					
7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer." <input type="checkbox"/> Continued on attached sheet. Rich Brace - P.O. Box 18302 Spokane, WA - 99228 Renee Bankort P.O. Box 18302 Spokane, WA 99228 Randy Marlor P.O. Box 18302 Spokane, WA 99228					
8. Campaign Bank or Depository Spokane Teachers Credit Union		Branch Main		City Spokane	
9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address. Street Address, Room Number, City where campaign books will be available for inspection 5003 N. Monroe St. Spokane, WA 99205 In order to make an appointment, contact the campaign at (telephone, fax, e-mail): (509) 216-8578					
10. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters. <input checked="" type="checkbox"/> A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.			11. Signature and Certification. I certify that this statement is true, complete and correct to the best of my knowledge. Committee Treasurer's Signature Melissa Olson Date 4/27/15		

SEE INSTRUCTIONS ON NEXT PAGE

To Whom it May Concern:

I am writing in response to the letter Spokane For Honest Government received from the PDC regarding alleged violations.

Violation 1: This was a complaint previously filed by Freedom Foundation and was simply a failure of training for the PAC treasurer last year. Our Treasurer took all of the PDC training classes last year however none of them addressed C6 forms. All of the expenditures and contributions were filed with PDC but they were simply not done correctly. Once our treasurer became aware of the issue and worked the PDC she went back and corrected all of the forms to the satisfaction of whomever she worked with from PDC. That treasurer has chosen to not remain with us and so we once again in 2016 are utilizing a new treasurer. Our current Treasurer has reached out to PDC to try and confirm that this issue was resolved however at the time of this letter has not heard back and I did not want to wait to reply in order to be timely. However it is our position that this issue has been properly resolved.

Violation 2: This is not a Spokane For Honest Government Issue.

Violation 3: This is not a Spokane For Honest Government Issue.

Violation 4: This is technically not a Spokane For Honest Government issue either although we are aware of these laws and verified that the equipment used for all adds by the Firefighters was all owned by the Spokane Firefighters Union Local 29 and none was the property of the City of Spokane. This issue is unfounded.

Violation 5: This is not a Spokane For Honest Government Issue.

Violation 6: The Spokane Firefighters Union did in fact make a contribution to SFHG for \$2,000 on 4/28/15. The SFHG PAC did in fact report this contribution to the PDC on 5/12/15. This allegation is simply not true. The reporting is clearly made in the next reporting period.

Violation 7: Again, C6 was not clearly understood. We believe when the treasurer fixed violation 1 she also corrected this issue. If not please reply to current PAC treasurer as to how to modify previous report. Most of our reporting was non partisan so if it was accidentally marked as Democrat on one of the reports we can fix that but believe that to already be done.

Expenditure that was paid to Lawton Printing but list USPS is simply because treasurer was trying to be thorough and breakdown exactly what the money went for. Lawton Printing paid for the postage and

we wrote check to reimburse them for the postage. The money spent was in fact for postage and paid to USPS so this expenditure is more accurate

The “probably not violations section”: The Spokane Firefighters PAC names are properly registered PAC names for Local 29. We report Local 29 and attempted at all times to most clearly state where the money comes from. It was not our intent to try and hide any of the contribution. Local 29 most clearly shows public where the money is coming from rather than listing various names. It is my understanding that the intent of the PDC is to most clearly tell the public where contributions are coming from and we believe we met that standard.

Also, SFHG PAC director is no longer Ms. Gaddess. I am currently the PAC director and was also involved last year so I believe I am the best person to contact for further questions or concerns over all matters.

Thank you for reading this and please let me know if there is any further information desired from SFHG PAC.

Sincerely,

Randy Marler

Spokane For Honest Government PAC director.

spokaneforhonestgovernment@gmail.com

Form C6 1/12	5959 10/16/2015
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Reporting Form for: (check one)

Instructions on Page 3

- ☐ **INDEPENDENT EXPENDITURES** (Occurring at any time) — \$100 or more
☒ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — \$1,000 or more
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — \$1,000 or more

1. Name and complete postal mailing address of sponsor: SPOKANE FOR HONEST GOVERNMENT P.O. BOX 18302 SPOKANE, WA 99208	E-mail SPOKANEFORHONESTGOV Telephone 5092168578
--	--

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/16/15	10/16/15	LAWTON PRINTING 4111 E. MISSION AVE SPOKANE, WA 99202	MAILER ADVERTISEMENT	2,938.00
Expenditures \$100 or less not itemized above				\$ 0.00

Amount or Value *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	\$ 2,938.00
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 2,938.00

3. List of candidate(s) or ballot proposition(s) identified in the advertising.					Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose			
STRATTON, KAREN	CITY COUNCIL MEMBER/CITY OF SPOKANE	NON PARTISAN	<input type="checkbox"/> <input checked="" type="checkbox"/>		\$ 2,938.00	\$ 0.00
			<input type="checkbox"/> <input type="checkbox"/>		\$	\$
			<input type="checkbox"/> <input type="checkbox"/>		\$	\$
			<input type="checkbox"/> <input type="checkbox"/>		\$	\$

Continued on attached sheet ☐

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ☐ An individual using only personal funds.
 b) ☐ An individual using personal funds and/or funds received from others.
 c) ☐ A business, union, group, association, organization, or other person using only general treasury funds.
 d) ☐ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
 e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
 f) ☐ A political committee filing C-5 reports. (RCW 42.17A.250)
 g) ☐ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.

Signature

Printed Name

MELISSA OLSON

Street address

P.O. BOX 18302

City/State/Zip

SPOKANE**WA 99208**

Date Signed

10/16/15

Place Signed (city and county)

SPOKANE**SPOKANE**

*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

Form C6 1/12	6020 AMENDS 6018 10/22/2015
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Reporting Form for: (check one)

Instructions on Page 3

- ☐ INDEPENDENT EXPENDITURES (Occurring at any time) — \$100 or more
- ☒ INDEPENDENT EXPENDITURE ADS (Appearing within 21 days of an election) — \$1,000 or more
- ☐ ELECTIONEERING COMMUNICATIONS, Except Contributions (Appearing within 60 days of an election) — \$1,000 or more

1. Name and complete postal mailing address of sponsor: SPOKANE FOR HONEST GOVERNMENT P.O. BOX 18302 SPOKANE, WA 99208	E-mail SPOKANEFORHONESTGOV Telephone 5092168578
---	--

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/16/15	10/16/15	LAWTON PRINTING 4111 E. MISSION AVE SPOKANE, WA 99202	MAILERS	2,938.00
10/22/15	10/22/02	LAWTON PRINTING 4111 E MISSION SPOKANE, WA 99202	MAILERS	2,512.16
Expenditures \$100 or less not itemized above				\$ 0.00

Amount or Value *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	\$ 5,450.16
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 5,450.16

3. List of candidate(s) or ballot proposition(s) identified in the advertising.					Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose			
KINNEAR, LORI	CITY COUNCIL MEMBER/CITY OF SPOKANE	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 2,512.16	\$ 0.00
STRATTON, KAREN	CITY COUNCIL MEMBER/CITY OF SPOKANE	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 2,938.00	\$ 0.00
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$

Continued on attached sheet ☐

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ☐ An individual using only personal funds.
 b) ☐ An individual using personal funds and/or funds received from others.
 c) ☐ A business, union, group, association, organization, or other person using only general treasury funds.
 d) ☐ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
 e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
 f) ☐ A political committee filing C-5 reports. (RCW 42.17A.250)
 g) ☐ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication		
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature	Printed Name MELISSA OLSON
	Street address P O BOX 18302	
	City/State/Zip SPOKANE WA 99228	
	Date Signed 10/22/15	Place Signed (city and county) SPOKANE SPOKANE
	*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

Form C6 1/12	6082 10/27/2015
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Reporting Form for: (check one)

Instructions on Page 3

- ☐ INDEPENDENT EXPENDITURES (Occurring at any time) — \$100 or more
☒ INDEPENDENT EXPENDITURE ADS (Appearing within 21 days of an election) — \$1,000 or more
☐ ELECTIONEERING COMMUNICATIONS, Except Contributions (Appearing within 60 days of an election) — \$1,000 or more

1. Name and complete postal mailing address of sponsor: SPOKANE FOR HONEST GOVERNMENT P.O. BOX 18302 SPOKANE, WA 99208	E-mail SPOKANEFORHONESTGOV Telephone 5092168578
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2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/27/15	10/27/15	LAWTON PRINTING 4111 E MISSION SPOKANE, WA 99202	MAILERS	4,992.30
Expenditures \$100 or less not itemized above				\$ 0.00

Amount or Value *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	\$ 4,992.30
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 10,442.46

3. List of candidate(s) or ballot proposition(s) identified in the advertising.					Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose			
KINNEAR, LORI	CITY COUNCIL MEMBER/CITY OF SPOKANE	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 2,598.15	\$ 0.00
STRATTON, KAREN	CITY COUNCIL MEMBER/CITY OF SPOKANE	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 2,394.15	\$ 0.00
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$

Continued on attached sheet ☐

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ☐ An individual using only personal funds.
 b) ☐ An individual using personal funds and/or funds received from others.
 c) ☐ A business, union, group, association, organization, or other person using only general treasury funds.
 d) ☐ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
 e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
 f) ☐ A political committee filing C-5 reports. (RCW 42.17A.250)
 g) ☐ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication		
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature	Printed Name MELISSA OLSON
	Street address P O BOX 18302	
	City/State/Zip SPOKANE WA 99202	
	Date Signed 10/27/15	Place Signed (city and county) SPOKANE WA
	*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

Form C6 1/12	6189 6/20/2016
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Reporting Form for: (check one)

Instructions on Page 3

- ☒ **INDEPENDENT EXPENDITURES** (Occurring at any time) — \$100 or more
☐ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — \$1,000 or more
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — \$1,000 or more

1. Name and complete postal mailing address of sponsor: SPOKANE FOR HONEST GOVERNMENT P.O. BOX 18302 SPOKANE, WA 99208	E-mail SPOKANEFORHONESTGOV Telephone 5092168578
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2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/27/15	10/27/15	PEAK VIDEO CONSULTING 2626 N. ALTAMONT ST. SPOKANE, WA 99202	TV PROMOTIONS	300.00
10/27/15	10/27/15	NWP CONSULTING 105 S. MAIN ST. STE 332 SEATTLE, WA 98104	MAILERS	5,929.46
10/27/15	10/27/15	NWP CONSULTING 105 S. MAIN ST. STE 332 SEATTLE, WA 98104	MAILERS	4,655.61
11/06/15	11/06/15	NWP CONSULTING 105 S. MAIN ST. STE 332 SEATTLE, WA 98104	MAILERS	5,043.65
Expenditures \$100 or less not itemized above				\$ 0.00

Amount or Value *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	\$ 94,134.75
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 94,134.75

3. List of candidate(s) or ballot proposition(s) identified in the advertising.					Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose			
KINNEAR, LORI	CITY COUNCIL MEMBER/SPOKANE FIRE PROT DIST 02	DEMOCRAT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 46,080.40	\$ 46,080.40
STRATTON, KAREN	CITY COUNCIL MEMBER/SPOKANE FIRE PROT DIST 03	DEMOCRAT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 48,054.35	\$ 48,054.35
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$

Continued on attached sheet ☐

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ☐ An individual using only personal funds.
 b) ☐ An individual using personal funds and/or funds received from others.
 c) ☐ A business, union, group, association, organization, or other person using only general treasury funds.
 d) ☐ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
 e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
 f) ☐ A political committee filing C-5 reports. (RCW 42.17A.250)
 g) ☐ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication		
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature	Printed Name MELISSA OLSON
	Street address 2832 W. BROAD AVE.	
	City/State/Zip SPOKANE WA 99205	
	Date Signed 06/20/16	Place Signed (city and county) SPOKANE SPOKANE
	*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

C6 Continuation Page

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value
11/20/15	11/20/15	PEAK VIDEO CONSULTING 2626 N. ALTAMONT ST. SPOKANE, WA 99202	ADVERTISING	300.00
11/20/15	11/20/15	WIN/WIN ACTION 1402 THIRD AVE STE 201 SEATTLE, WA 98104	TELEPHONE POLLS	200.00
11/20/15	11/20/15	FUSE VOTES 1402 THIRD AVE STE 406 SEATTLE, WA 98104	ADVERTISING	1,201.55
10/22/15	10/22/15	NWP CONSULTING 105 S. MAIN ST. STE 332 SEATTLE, WA 98104	PRINTING FOR MAILERS	6,104.48
10/22/15	10/22/15	PEAK VIDEO CONSULTING 2626 N. ALTAMONT ST. SPOKANE, WA 99202	KINNEAR SPOT	1,475.00
10/22/15	10/22/15	PEAK VIDEO CONSULTING 2626 N. ALTAMONT ST. SPOKANE, WA 99202	STRATTON SPOT	1,475.00
09/10/15	09/10/15	API P O BOX 251 SPOKANE, WA 99210	MEDIA BUY	50,000.00
09/21/15	09/21/15	EMC RESEARCH 720 THIRD AVE, SUITE1110 SEATTLE, WA 98104	PHONE SURVEYS	9,200.00
09/21/15	09/21/15	EMC RESEARCH 720 THIRD AVE, SUITE1110 SEATTLE, WA 98104	PHONE SURVEYS	7,900.00
10/03/15	10/03/15	WIN/WIN ACTION 1402 THIRD AVE STE 201 SEATTLE, WA 98104	OFFICE RENTAL/ PHONE SURVEYS	350.00

Spokane for Honest Government - PDC Case 9059
Late C-6 Reporting
2015 Spokane City Council Elections

Date of Expenditure	Date Ad Presented to Public	Date C-6 Due	Date C-6 Filed	Days C-6 Filed Late	Amount	Description/Purpose	Date C-4 Filed	Expenditure Attributable to Candidate on C4?	When C-6 Filed Late, # Days C4 Filed After C-6 Due Date
10/16/2015	10/16/2015	10/17/2015	10/16/2015	0	\$2,938.00	Mailers-USPS (Supporting Karen Stratton)	10/26/2015	No	C-6 Timely Filed
10/22/2015	10/22/2015	10/23/2015	10/22/2015	0	\$2,512.16	Postage for Kinnear Contrast-USPS (Supporting Lori Kinnear)	10/26/2015	Yes	C-6 Timely Filed
10/27/2015	10/27/2015	10/28/2015	10/27/2015	0	\$4,992.30	Mailers-USPS (Supporting Lori Kinnear & Karen Stratton)	12/6/2015	No	C-6 Timely Filed
10/27/2015	10/27/2015	10/28/2015	6/20/2016	236	\$300.00	TV Promotions-Peak Video Consulting	12/6/2015	No	39
10/27/2015	10/27/2015	10/28/2015	6/20/2016	236	\$5,929.46	Mailers-NWP Consulting	12/6/2015	No	39
10/27/2015	10/27/2015	10/28/2015	6/20/2016	236	\$4,655.61	Mailers-NWP Consulting	12/6/2015	No	39
11/6/2015	11/6/2015	11/7/2015	6/20/2016	226	\$5,043.65	Mailers-NWP Consulting	12/6/2015	No	29
11/20/2015	11/20/2015	11/21/2015	6/20/2016	212	\$300.00	Advertising-Peak Video Consulting	12/6/2015	No	15
11/20/2015	11/20/2015	11/21/2015	6/20/2016	212	\$200.00	Telephone Polls-WIN/WIN Action (IE but not EC)	12/6/2015	No	15
11/20/2015	11/20/2015	11/21/2015	6/20/2016	212	\$1,201.55	Advertising-Fuse Votes	12/6/2015	No	15
10/22/2015	10/22/2015	10/23/2015	6/20/2016	241	\$6,104.48	Printing for Mailers-NWP Consulting	10/26/2015	No	3
10/22/2015	10/22/2015	10/23/2015	6/20/2016	241	\$1,475.00	Kinnear Spot-Peak Video Consulting	10/26/2015	Yes	3
10/22/2015	10/22/2015	10/23/2015	6/20/2016	241	\$1,475.00	Stratton Spot-Peak Video Consulting	10/26/2015	Yes	3
9/10/2015	9/10/2015	9/11/2015	6/20/2016	283	\$50,000.00	Media Buy-API	10/12/2015	No	31
9/21/2015	9/21/2015	9/22/2015	6/20/2016	272	\$9,200.00	Phone Surveys-EMC Research (IE but not EC)	10/12/2015	No	20
9/21/2015	9/21/2015	9/22/2015	6/20/2016	272	\$7,900.00	Phone Surveys-EMC Research (IE but not EC)	10/12/2015	No	20
10/3/2015	10/3/2015	10/4/2015	6/20/2016	260	\$350.00	Office Rental for Phone Surveys-WIN/WIN Action (IE but not EC)	10/12/2015	No	8
Totals				212-283	\$104,577.21				
Support for Lori Kinnear - \$51,190.71									
Support for Karen Stratton - \$53,386.50									
Total Candidate Support - \$104,577.21									
Reported 212-283 Days Late on C-6 Reports	\$94,134.75								