Office Use Only	No.		
Office Ose Offig.	740	 	

NOV = 7 2013



Public Disclosure Commission

WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION COMPLAINT FORM

(See instructions on the last page.) **Description of Complaint**

1. RESPONDENT:

Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.

National Association of Realtors Fund

430 N. Michigan Ave Chicago, IL, 60611-4087 Phone: 312-329-8239 Email: unknown

2. **ALLEGED VIOLATIONS:**

Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17/RCW 42.17A or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed. (Note that the

According to *The Seattle Times* Nov. 5 article titled "Ad spending for Bellevue's Wallace reported late," the National Association of Realtors Fund "filed electronic reports (Nov. 5, Election Day) for \$76,000 worth of direct mail, phone calls and online advertising first presented to voters Oct. 11 in support of Bellevue City Council candidate Kevin Wallace and Vancouver Mayor Tim Leavitt." Under public disclosure laws, the reports should have been filed electronically on Oct. 14. Instead, the Realtors waited until Oct. 30, a week before the election, to file a paper report, and did not file electronically until Election Day on Nov.5. This violation of our law could have swayed what is turning out to be a very close election, with Wallace in the lead at this point, and if so this election should be recalled.

I am no attorney, but I believe this is in direct violation of RCW 42.17A.205, RCW 42.17A.225, and 42.17A.220 regarding campaign finance and contributions.

Evi	dence and	Witnesses	

2. EVIDENCE:

List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.

The primary evidence is this Seattle Times story in which the compliance director for the PDC is quoted. The secondary evidence on the next page is the PDC report with the late dates.

POLITICS NORTHWEST

total control

The Seattle Times political team explores national, state and local politics.

November 5, 2013 at 5:45 PM

Ad spending for Bellevue's Wallace reported late

Posted by Keith Ervin

The National Association of Realtors Fund belatedly reported spending \$36,200 for political ads supporting Bellevue City Councilmember Kevin Wallace's re-election campaign.

Phil Stutzman, compliance director for the state Public Disclosure Commission, said the Realtors filed electronic reports today for \$76,000 worth of direct mail, phone calls and online advertising first presented to voters October 11 in support of Wallace and Vancouver Mayor Tim Leavitt.

Under public-disclosure laws the reports were to have been filed electronically on October 14, the first business day after they were presented.

Instead, the Realtors filed a paper report Oct. 30 and failed to file electronically until today

after being contacted by PDC staff, Stutzman said. He said the PDC would investigate the reporting if it receives a complaint.

Wallace, who is running for a second term on the City Council, has reported raising \$138,938, compared to challenger Steve Kasner's \$67,689. Labor and environmental groups have largely funded \$8,701 in independent pro-Kasner ads and \$8,523 in anti-Wallace ads. Business interests including the Realtors have spent \$38,700 in favor of Wallace.

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NOV - 7 2013

Public Disclosure Commission



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Bellevue City Council member Kevin Wallace thanks his supporters in a short speech after seeing his 51 percent lead it initial election results over challenger Steve Kasner at the Hyat Regency Bellevue. (Lindsey Wassen / The Seattle Times)

	J (3	LYMPIA YA 98504-0908 60) 753-1111 DLL FREE 1-877-601-2828				. Assurphysiological improblem (Moses	U 0	11/	5/2013
□ INDE	g Form for: PENDENT	EXPENDITURES (Occi	Instructi	- \$10	0 or mo	ore	•		
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1. Nai	me and com	olete postal mailing addre	ss of sponsor:					E-mail	
NATL AS	•	OF REALTORS FUND	oo or oponioon					KPASCH2	AL@REALTORS.O
CHICAGO	, IL 60	611						312-32	9-8239
2. Itemiz	ze expenditure	s of more than \$100 associa	ited with the inde	pende	nt expend	ilture or el	ectioneering c	ommunica	ition.
Date Made	Date First Presented/ Mai_d	Name and Addres Vendor or Recipi		(e.g., d		on of Exper	nditure TV or radio ad)		unt or Value lee Below)
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	- Annabar	·	Ехр	enditur	es \$100 o	r less not it	emized above	\$	0.00
						Te	otal this report	\$	76,400.00
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 independent expanditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.						đ.	70.000		
3. List	of candidate(s) or ballot proposition(s) ide	entified in the adv	1			lion of current	\$ Show tota	76,400.00 I C-6 expenses
	Proposition	Office/District/ Proposition No.		Ch	eck r Oppose	expense a each cano propositio			each candidate/ n during election
WALLACE,	KEVIN	CITY COUNCIL MEMBER/CITY OF BELLEVUE	non Partisan	X		S	36,200.00	\$	36,200.00
LEAVITT,	TIMOTHY	MAYOR/CITY OF VANCOUVER	NON PARTISAN	v		\$	40,200.00	\$	40,200.00

3. WITNESSES:

List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. Attach additional pages if needed.

Unknown at this time.

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NOV - 7 2013

Public Disclosure Commission

Certification

In signing this complaint:

- · I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

Your name (print or type) Rebecca E Lewis

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NOV -7 2013

Public Disclosure Commission

Telephone number (including area code) 425-746-5869
E-mail address (optional) rebeccie@comcast.net

Required for complaints against elected officials or candidates for elective office:

Oath

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.*

Your signature Rebecca E Lewis

Date signed 11/7/13

Place signed (city and county)

City Bellevue

County King

Attachments

€ Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint. (copy of letter attached)

*RCW 9A.72.040 says 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."

Washington State Public Disclosure Commission Instructions for Filing a Formal Complaint

When to use the formal complaint form:

While this form is not required, its use is recommended when you want to file formal allegations of a violation of the Public Disclosure Commission (PDC) statutes or rules. You can find the PDC statutes and rules on the PDC website at www.pdc.wa.gov. If you have information or concerns about a possible violation but do not wish to file a complaint, please contact the PDC office directly.

How to submit your complaint form to the PDC:

- Complete all sections. If you do not have some information, please write "unknown" instead of leaving a blank space.
- Attach copies of any evidence you have we'll contact you if we need originals.
- Sign the oath if your complaint is against an elected official or a candidate for elective office.
- Mail, fax, or email your complaint and all attachments to the PDC.

If you have more questions:

If you have more questions about filing a complaint, see the "Frequently Asked Questions about Filing a Complaint" guide available on the PDC's website at www.pdc.wa.gov under "Enforcement and Compliance." You may also contact the PDC directly.

PDC Contact Information

MAILING ADDRESS: Washington State Public Disclosure Commission

711 Capitol Way, Room 206

PO Box 40908

Olympia, WA 98504-0908

EMAIL ADDRESS:

pdc@pdc.wa.gov

PHONE:

1-877-601-2828 (toll free)

NOV = 7.2013

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Public Disclosure Commission

FAX:

(360) 753-1112

HOURS:

Monday-Friday, 8:00 a.m. - 5:00 p.m., closed on state holidays.

RECEIVED



TO:	AUG - 6 2013
FAX NUMBER: (360) 753-1112	Public Died
FROM: KAREN PASCHAL	Public Disclosure Commission
FAX NUMBER:	
DATE: 8/6/2013 11:51 AM	
REGARDING:	
PHONE NUMBER FOR FOLLOW-UP: (312) 329-8239	
COMMENTS	***

NATIONAL ASSOCIATION OF REALTORS

(312) 329-8239 | |

PUBLIC DISCLOSURE COMMISSION
711 CAPITOL WAY RM 208
PD BOX 40998
0LYMPIA WA 98504-0908
(360) 753-1111
TOLL FREE 1-877-501-2828

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AUG ~ 6 2013

Public Disclosure Commission

Reportin	g Form fo	r: (check one) Inst		_	1/12	Public Disclosure Commissi
☐ INDE	PENDEN ¹	T EXPENDITURES (Occurring at any time		ons on Pag \$100 or o	•	
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-		30 N. MICHIGAN	11			3/2370-873
2. Itemize	expenditur Date First	es of more than \$100 associated with the	indepe	endent expe	nditure or electioneering	g communication.
Date Made	Presented/ Mailed	Name and Address of Vendor or Recipient	(e.	Descrip g., direct mail	otion of Expenditure or newspaper, TV or radio ac	Amount or Value ("See Below)
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		WASHINGTON, DC			•	
			Expend	litures \$100 d	or less not itemized above	s
*If no some	مد مدنده ماطد	Amount or Value		Total indepe	Total this report	\$ 8,500.00
property or rig distributed.	ible estimate tht furnished (can be made of value, describe activity, sen precisely and attach copy of item produced of	rices, or	electioneering during this ele amounts sho	g communications made ection campaign. Include wn in this report and bmitted C-6 reports.	
3. List of	candidate(s) or ballot proposition(s) identified in the			1	\$ 8,500,00
Candidate/Pr		Office/District/ Proposition No. Party	Suppo	Check ort or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
PARY NA	216117	Snotomish "REPUBLICA County Council - Dist. 1	du D		\$ 8,500.00	\$ 8500.00
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AUG - 62013

C-6 Page 2

Filer	Na	am	e:	

- 4. If reporting an Electioneering Communication, it is necessary to disdicted and the concession of 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)

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
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			\$
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		Sub-Total	\$.
	Continued on attached sheet	Amount from attached pages	\$
1 10		TOTAL EURDS DESCRIPTO	\$

Sponsor of Inc	lependent Expenditure or Electioneering Communication
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perjury under the laws of the State of	The state of the s
Washington that this expenditure was not	Street address In fasched Annew Paschae
made in cooperation, consultation, or concert with, or at the request or	
suggestion of, a candidate, a candidate's	430 N M
authorized committee, or an accept of a	City/State/Zip
candidate nor does it otherwise constitute a	Oligiolateizip
contribution under RCW 42 17A 005.	(HICAGO, 7L 60611
further certify that the above information is true, complete, and correct to the best of	Dale Signed Diago Signed (six and six
my knowledge.	race signed (crty and county)
	*RCWBA.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 mindemanage."

PUBLIC DISCLOSURE COMMISSION
711 CAPITOL WAY RM 206
PO BOX 49908
OLYMPIA WA 98504-0908
(360) 753-1111
TOLL FREE 1-877-601-2828

Form 5074 **C6**1/12
1/31/2014

Instructions on Page 3 Reporting Form for: (check one) X 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 E-mail 1. Name and complete postal mailing address of sponsor: NATL ASSOCIATION OF REALTORS FUND KPASCHAL@REALTORS.O 430 N. MICHIGAN Telephone CHICAGO, IL 60611 312-329-8239 2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication. **Date First Description of Expenditure** Amount or Value Name and Address of Presented/ **Date Made** (e.g., direct mail or newspaper, TV or radio ad) Mailed Vendor or Recipient (*See Below) 08/02/13 08/01/13 TARGETSMART COMMUNICATIONS VOTER ID, CANDADV., CALLS 8,500.00 1750 K. ST., NW WASHINGTON, DC 20006 Expenditures \$100 or less not itemized above \$ 0.00 Total this report \$ 8,500.00 Total independent expenditures and **Amount or Value** electioneering communications made *If no reasonable estimate can be made of value, describe activity, services, during this election campaign. Include property or right furnished precisely and attach copy of item produced or amounts shown in this report and distributed. previously submitted C-6 reports. 8,500.00 3. List of candidate(s) or ballot proposition(s) identified in the advertising. Show portion of current Show total C-6 expenses expense attributable to related to each candidate/ each candidate or proposition during election Office/District/ Check Candidate/Proposition proposition campaign Proposition No. Party Support or Oppose GARY, WRIGHT COUNTY COUNCIL REPUBLIC X 8,500.00 8,500.00 MEMBER/SNOHOMISH CO \$ \$ П П \$ \$

Continued on attached sheet □

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- 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) \underline{x} 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
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			\$
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		Sub-Total	\$ 0.00
	Continued on attached sheet □	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 Signature Printed Name perjury under the laws of the State of KAREN PASCHAL Washington that this expenditure was not Street address made in cooperation, consultation, or concert with, or at the request or 430 N. MICHIGAN suggestion of, a candidate, a candidate's City/State/Zip authorized committee, or an agent of a CHICAGO 60422 candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I Date Signed Place Signed (city and county) further certify that the above information is 01/31/14 CHICAGO true, complete, and correct to the best of *RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false my knowledge. statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

FAX

TO: FAX NUMBER: (360) 753-1112 OCT 3 0 2013 FROM: KAREN PASCHAL Public Disclosure Commission FAX NUMBER: DATE: 10/30/2013 6:04 PM REGARDING: PHONE NUMBER FOR FOLLOW-UP: COMMENTS:

NATIONAL ASSOCIATION OF REALTORS
430 N. MICHIGAN AVE



C6

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OCT 3 0 2013

Public Disclosure Commission

		CTIONEER	EXPENDITURE AI	DS (Appearing within 2 TIONS, Except Con	21 days itributio	of an election ons (Appearing	n) — \$1,000 or mo ng wilhin 60 days of an elec	re lion) — \$1,000 or more
		ational As	plete postal mailing ac ssociation of Reall Michigan Ave					E-mail Coaschalp reallers.
			I. De bouls					312-329-8239
	2. itemiz	ze expenditure	es of more than \$100 ass	ociated with the ind	lepend	ent expend	diture or electioneering	communication.
	Date Made	Date First Presented/ Mailed	Name and Ad Vendor or R	ecipient	(e.g.,		ion of Expenditure r newspaper, TV or radio ad	Amount or Value ("See Below)
0/	3/2013	10/11/2013	Associated Can and Election Serv 1750 K. Street, Workington, DC &	ngaigh Consilling icas Suite 700 0000		licet m	ail, phone colls,	76,000.00
)[3/2013	10/3/2019	National Associ 430 N. Michiga Chizago, Ic G	n Ave		lling and	1 Consulting	400.00
				Ex	penditu	ıres \$100 o	r less not itemized above	\$
	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 independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.						\$ 76,400.00	
	3. List of candidate(s) or ballot proposition(s) identified in the advertising. Office/District/ Candidate/Proposition Proposition No. Party Support or Oppose Show portion of current expense attributable to each candidate or proposition					Show total C-6 expenses related to each candidate/ proposition during election campaign		
	Kevin	Wallace	Bellevue City Comci)	Republican	8		\$ 34,000.00	\$ 36,000.00
	Tim L	eavitt	Nayor	Democrat	×		\$ 40,000.00	\$ 40,000.00
			, 	•			\$	\$
_							\$	\$
•							\$	\$
-				Continued on a	ttached	sheet 🗆	\$	\$

Filer	Na	me:
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Public Disclosure Commission

- 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) XA 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

Sources givin	g in excess of \$250	for the electioneerin	g communication:			
Date Received	Source's Na City, S	me, Address, tate, Zip	For indiv			Amount
13/2013	National Association of Reallers 430 N. Midhigan Are				\$ 400-00	
	Chicogo, IL	60611	Occupation			
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				Sub-Total	\$	400.00
	Continue	d on attached sheet	Amount fr	om attached pages	\$	-1.00
ertify (or declare) u jury under the law shington that this	nder penalty of	Signature	e or Electioneering C	Communication Printed Name	150 L	400.00
de in cooperation, cert with, or at the	consultation, or request or idate; a candidate's	Street address 430 (City/State/Zip	V. Michigan	Δ	130_	
ididate nor does it itribution under RC her certify that the	otherwise constitute a W 42-17A 005 . I above information is prect to the best of	Date Signed		Q [Place Signed (city and	county	
knowledge.		10/30	12013	Chicago		

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TO:	DCF 30 2013
FAX NUMBER: (360) 753-1112	Public Disclosure Commission
FROM: KAREN PASCHAL	
FAX NUMBER:	
DATE: 10/30/2013 5:39 PM	,
REGARDING:	
PHONE NUMBER FOR FOLLOW-UP: (312) 329-8239	
COMMENTS.	

NATIONAL ASSOCIATION OF REALTORS 430 N. MICHIGAN AVE (312) 329-8239 | |

PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 P0 80X 40908 0LYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828

C6

RECEIVED

OCT 3 0 2013

Public Disclosure Commission

	Reportir	ng Form for	: (check one)	Instruc	tions on	Page	3	Funit Disclosure Commiss
	☐ INDE	PENDENT		DS (Appearing within a	21 days of an	electio	n) \$1,000 or more	e on) — \$1,000 or more
		National	Association of		:			E-mail Kgeschale realturs.un Telephone
		430 N. 1	Michigan Ave.		-			312-329-8239
	2. Itemiz	ze expenditure	s of more than \$100 as	sociated with the ind	ependent e	expend	diture or electioneering c	ommunication.
	Date Made	Date First Presented/ Mailed	Name and A Vendor or F	Recipient	De (e.g., direct	escripti i mail oi	ion of Expenditure r newspaper, TV or radio ad)	Amount or Value (*See Below)
101	124/2013	10/28/2013	P.O Bix 1156		Direct	. //	7a: 1	47,500.00
			Bainbridge Is					•
101	/24/2013	10/84/2017	National Associ 430 N. Michiga Chicago, Il G	ntion of REALIERS an Ave.	Poll Exg	ing lense	and Consulting	1,200.00
			5		penditures \$	\$100 o	r less not itemized above	\$
	<u> </u>						Total this report	\$ 48,700.00
			Amount or Value can be made of value, do precisely and attach copy		es, election during amour	neering this elects	ndent expenditures and g communications made ection campaign. Include wn in this report and bmitted C-6 reports.	s 57 ,200,00
		of candidate(s	s) or ballot proposition(Office/District/ Proposition No.		dvertising. Check Support or Op	pose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
	Nancy F	Backus		Republican	(X)		\$ 11,000.00	\$ 11,000.00
	Dino L) aris	Brenerium City Council	Demociat	\(\bar{\bar{\bar{\bar{\bar{\bar{\bar{		\$ 6,000.00	\$ 6,000.00
-	Don B	aines	Kennewick	Republican			\$ 8,000.00	\$ 8,000.00
_	Steve }	Jastings	City Council Di				\$ 7,500.00	\$ 7,500.00
4	John J.	lopking	City Council 1	Republican Distruction	· 🔁 ।		\$ 7,500.00	\$ 7,500.00
		1	,	Continued on at	tached shee	*\X	\$	\$

DISCLOSURE COMMISSION 711 CAPITOL WAY BM 208 **OLYMPIA WA 98504-0908** (360) 753-1411

Form

RECEIVED

OCT 3 0 2013

Public Disclosure Commission 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: 2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication. Date First Presented/ Name and Address of **Description of Expenditure** Amount or Value Date Made Mailed Vendor or Recipient (e.g., direct mail or newspaper, TV or radio ad) ("See Below) Expenditures \$100 or less not itemized above Total this report Amount or Value Total independent expenditures and *If no reasonable estimate can be made of value, describe activity, services, electioneering communications made during this election campaign. Include property or right furnished precisely and attach copy of item produced or amounts shown in this report and distributed. previously submitted C-6 reports. List of candidate(s) or ballot proposition(s) identified in the advertising. Show portion of current Show total C-6 expenses expense attributable to related to each candidate/ Office/District/ each candidate or proposition during election Check Candidate/Proposition proposition Support or Oppose campaign Purjallug Republican

X

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Continued on attached sheet [

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Public Disclosure Commission

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) X 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)

Date Received	Nextess of \$250 for the electioneer Source's Name, Address, City, State, Zip National Association of Realturs 430 N. Michigan Ave. Chicago, IL Gould	For individuals, Employer's Name, City and State Occupation Occupation	\$ 48,700-00 \$
Received	National Association	Occupation Occupation	\$ 48,700-00
10/24/2013	National Association of Realturs 430 N. Michigan Ave. Chicago. IL Gouil	Occupation	\$
	Chicago. It Gouil	Occupation	\$
	·		
			\$
		Occupation	\$
		Occupation	⊣ i
1			
			s
		Occupation	
			s
		Occupation	
			s
		Occupation	
		Sub-Total	\$ 48,700.00
	Continued on attached sheet	Amount from attached pages	\$(5)
I certify (or declare) under perjury under the laws of Washington that this exp made in cooperation, coronert with, or at the reconcert with, or at the reconcert with, or at the reconcerd with or andidate authorized committee, or candidate nor does it oth contribution under RCW further certify that the attrue, complete; and corremy knowledge.	the State of enditure was not sultation, or Street address	MICHICAN Place Signed (city and dides that '(1) A person is quilty of file	PASCHAC county) CC TC (CCO)

C6

4935

11/5/2013

Reportin	g Form for:	(check one) Instr	uctio	ns on Page	3		
	PENDENT	EXPENDITURES (Occurring at any time EXPENDITURE ADS (Appearing with ING COMMUNICATIONS, Except of	hin 21 da	ays of an electio	n) — \$1,000 or more	e on) — \$1,0	00 or more
1 Nar	ne and comr	plete postal mailing address of spons	or:			E-mail	
	•	•	SUI.				
	SOCIATION (OF REALTORS FUND				Telephone	L@REALTORS.O
CHICAGO		611					0000
						312-329	
2. Itemiz		s of more than \$100 associated with the	indepe	endent expend	diture or electioneering o	ommunicat	on.
Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	(e		on of Expenditure r newspaper, TV or radio ad)		nt or Value e Below)
.0/24/13	10/28/13	GILPIN GROUP P. O. BOX 11563 BAINBRIDGE ISLAND, WA	נם	RECT MAIL			47,500.00
.0/24/13	10/24/13	NATIONAL ASSN OF REALTORS 430 N. MICHIGAN AVE. CHICAGO, IL 60611	PC	OLLING AND	CONSULTING		1,200.00
			Expen	ditures \$100 o	r less not itemized above	\$	0.00
					Total this report	\$	48,700.00
		Amount or Value can be made of value, describe activity, ser precisely and attach copy of item produced		electioneering during this ele amounts sho	ndent expenditures and g communications made ection campaign. Include wn in this report and bmitted C-6 reports.	\$	125,100.00
3. List	of candidate(s	s) or ballot proposition(s) identified in the	e adver	rtisina.	Show portion of current	Show total	C-6 expenses
	/Proposition	Office/District/ Proposition No. Party		Check port or Oppose	expense attributable to each candidate or proposition	related to ea	ach candidate/ during election
ACKUS, NA	<i>I</i> NCA	MAYOR/Select a REPUB Jurisdiction	ric [x 🗆	\$ 11,200.00	\$	11,200.00
AVIS, DIN	10	CITY COUNCIL DEMOCE MEMBER/CITY OF BREMERTON	RAT [x □	\$ 6,200.00	\$	6,200.00
ARNES, DO	DN	PORT REPUBI COMMISSIONER/PORT OF KENNEWICK	ric [x 🗆	\$ 8,200.00	\$	8,200.00
ASTINGS,	STEVEN	CITY COUNCIL REPUBI MEMBER/CITY OF PUYALLUP	ric [X 🗆	\$ 7,700.00	\$	7,700.00

Filer	Naı	me:
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- 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) x 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	<u> </u>
			\$
		Occupation	_ Ψ
		Occupation	\$
		Occupation	† \$
		Occupation	
			\$
		Occupation	
ı			\$
		Occupation	\$ 0.00
	Continued on attached sheet □	Sub-Total Amount from attached pages	\$ 0.00 \$ 0.00
	,	TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication

False swearing is a misdemeanor."

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
	KAREN PASCHAL
Street address	
430 N. MICHIGAN	
City/State/Zip	
CHICAGO	IL 60611
Date Signed	Place Signed (city and county)
11/05/13	CHICAGO COOK
*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)

C6 Continuation Page

3. List of candidate(s) of	or ballot proposition(s) ide	Show portion of current expense attributable to each candidate or	Show total C-6 expenses related to each candidate/ proposition during election		
Candidate/Proposition	Office/District/ Proposition No.	Party Support of	eck r Oppose	proposition	campaign
HOPKINS, JOHN	CITY COUNCIL MEMBER/CITY OF PUYALLUP	REPUBLIC X		\$ 7,700.00	\$ 7,700.00
MCNUTT, CHRISTOPHER	CITY COUNCIL MEMBER/CITY OF PUYALLUP	REPUBLIC X		\$ 7,700.00	\$ 7,700.0
				\$	\$
				\$	\$
				\$	\$
				\$	\$
				\$	\$
				\$	\$
				\$	\$
				\$	\$
				\$	\$
				\$	\$
				\$	\$
				\$	\$
				\$	\$
				\$	\$

C6

4932

11/5/2013

Reporti	ng Form for:	(check one)	Instructi	ions	s on Page	3			
	EPENDENT	EXPENDITURES (Occurring EXPENDITURE ADS (AP)	pearing within 21	1 day	s of an election	n) — \$1,			0 or more
4 Na	ma and same	loto postal mailing address	of opposite					E-mail	
	•	olete postal mailing address	or sponsor:		•				
	SSOCIATION MICHIGAN	OF REALTORS FUND							@REALTORS.C
CHICAGO		611						Telephone	
								312-329-	8239
2. Item	ize expenditure	s of more than \$100 associated	with the inde	pen	dent expend	liture or e	lectioneering c	ommunicatio	n.
Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient		(e.g.		on of Expe	nditure , TV or radio ad)	1	t or Value Below)
.0/03/13	10/11/13	ACCES 1750 K. STREET, SUITE WASHINGTON, DC 200	700	DIR	ECT MAIL	, PHONE	& ONLINE		76,000.00
.0/03/13	10/03/13	NATIONAL ASSN OF REAL 430 N. MICHIGAN CHICAGO, IL 60611	TORS	POL	LING AND	CONSUL	TING EXP		400.00
			Exp	endi	tures \$100 o	r less not i	temized above	\$	0.00
						T	otal this report	\$	76,400.00
	right furnished	Amount or Value can be made of value, describe a precisely and attach copy of item		s,		g communi ection cam wn in this r	cations made paign. Include eport and	\$	76,400.00
3 Lis	t of candidate(s	s) or ballot proposition(s) identi	fied in the adv	verti	sina	Show por	tion of current	Show total C	-6 expenses
	e/Proposition	Office/District/ Proposition No.		(Check t or Oppose		attributable to didate or	related to ea	ch candidate/ uring election
ALLACE,	KEVIN	CITY COUNCIL MEMBER/CITY OF BELLEVUE	NON PARTISAN	x		\$	36,200.00	\$	36,200.00
EAVITT,	TIMOTHY	MAYOR/CITY OF VANCOUVER	NON PARTISAN	x		\$	40,200.00	\$	40,200.00
						\$		\$	·
						\$		\$	

Continued on attached sheet □

Fi	ler	Na	me:

- 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) x 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
10/03/13	NATIONAL ASSN OF REALTORS 430 N. MICHIGAN CHICAGO, IL 60611			76,400.00
	0.110.100, 11 00011	Occupation		
			\$	
		Occupation		
			\$	
		Occupation		
			\$	
		Occupation		
			\$	
		Occupation		
			\$	
		Occupation		
		Sub-Total	\$	76,400.00
	Continued on attached sheet	Amount from attached pages	\$	0.00
		TOTAL FUNDS RECEIVED	\$	76,400.00

Sponsor of Independent Expenditure or Electioneering Communication

False swearing is a misdemeanor."

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			
	KAREN B	PASCHAL		
Street address				,
430 N. MICHIGAN				
City/State/Zip			•	
CHICAGO			IL	60611
Date Signed	Place Sign	ed (city and co	unty)	
11/05/13	CHICAGO)	COOK	
*RCW 9A.72.040 provides that "(1) A person is statement, which he knows to be false, under				

THE NORTH CREEK LAW FIRM

A PROFESSIONAL CORPORATION

Mark C. Lamb mark@northcreeklaw.com

January 16, 2014

VIA ELECTRONIC EMAIL & US MAIL

Mr. Phillip Stutzman Director of Compliance Public Disclosure Commission 711 Capitol Way Room 206 P.O. Box 719 Olympia, WA 98507-0719

Re: PDC Complaint - Case No. 14-009

Dear Phil,

Please consider this letter the response of my client, the National Association of Realtors Fund ("NAR") to the above referenced complaint. The following response addresses the complaint filed by Rebecca Lewis (the "Complainant") as well as additional issues raised in your letter of December 11, 2013.

The National Association of Realtors Fund is not a Political Committee

As you correctly observed in your letter, the Complainant alleged (but provided no evidence) that NAR is a political committee as that term is defined in RCW Chapter 42.17A. NAR is not a political committee as defined by this statute. Because of the absence of evidence, and the necessarily invasive nature of defending such an allegation, NAR will not address this issue further unless asked to do so by PDC staff.

Independent Expenditure Filings

The two C6 reports filed with the PDC dated November 5, 2013 were prepared and filed by Marc Gall, a member of the NAR Finance staff. Mr. Gall was quite new to the responsibility of preparing and filing campaign finance reports in various state and local jurisdictions in which NAR was engaged in campaign activity. During the period of time relevant to the complaint he was also involved in assisting with the preparation of some of the approximately 250 such reports filed by NAR in other state or local jurisdictions. Unfortunately, Mr. Gall did not receive

12900 NE 180th Street, Suite 235, Bothell, WA 98011 Tel: (425) 368-4238•Fax: (425) 489-2824

sufficient training or information about the electioneering communication reporting requirements in Washington State prior to being assigned the responsibility for C6 reports. As a result, he was not aware of the requirement in our state to file those reports within 24 hours of the commencement of the communication, or the requirement to file those reports electronically.

With respect to the C6 report dated November 5, 2013 concerning the communications in support of Kevin Wallace and Timothy Leavitt in the amount of \$76,400, the information regarding those expenditures was inadvertently filed with the similar campaign finance reporting agency in Washington, DC, rather than Washington State. This error was discovered when the C6 report also dated 11/5 (reporting October 24, 2013 communications in the amount of \$125,100) was being prepared with respect to communications in support of six other candidates. When that oversight was discovered the correct report was immediately prepared and filed at the same time. Both reports were filed via fax initially based on Mr. Gall's mistaken understanding that fax filing was permitted in Washington; when the requirement that the reports be filed electronically was called to NAR's attention the electronic reports were promptly prepared and filed.

Finally, the C6 report of communications in the amount of \$125,100 indicates "Date First Presented/Mailed" of 10/28 and 10/24. In fact the communications represented by the expenditures shown in that report were first distributed on 10/17 with subsequent distribution on 10/22 and 10/28. Also due to Mr. Gall's inexperience he did not appreciate the significance of the "First Presentation" dates and unintentionally included only the latest, rather than the earliest, such date in this C6 report.

NAR takes very seriously the requirements of RCW 42.17A and deeply regrets the unintentional errors in reporting that occurred during the 2013 election cycle. My client has endeavored to make sure all staff members responsible for filings are familiar with the requirements of the laws and regulations of our state. They have retained local counsel to advise them in this matter and to help prevent any reporting issues in the future. I trust this letter is responsive to your request of December 11, 2013 to Ralph Holmen to provide a response to the complaint filed by Ms. Lewis. If you require additional information or clarification please don't hesitate to contact me directly at this office.

Sincerely,

THE NORTH CREEK LAW FIRM

Mark C. Lamb

¹ At the request of Tony Perkins I have attached copies of the reports erroneously filed with the Government of the District of Columbia Office of Campaign Finance as well as the subsequent filling amending and correcting the report.