

# File a Formal Complaint - Zachary Smith

[Zachary Smith](#) (Sun, 17 Sep at 7:40 PM) via Portal Meta

To Whom It May Concern –

It appears that Washington State Campaign Finance Law may have been violated at least 17 times by the Committee to Elect Noelle Balliett for School Board. The PDC should immediately open an investigation for all items listed in this complaint.

## 1. Late C3 and C4 reports. (Potential Violation of RCW 42.17A.235)

- a) The C4 report covering the month of May was due by 6/10/2017. That report was not submitted until 6/13/2017, 3 days late.
- b) The C3 report for all deposits made the previous week due on 8/14/2017 was not submitted until 8/21/2017, 7 days late.
- c) The C3 report for all deposits made the previous week due on 8/7/2017 was not submitted until 8/10/2017, 3 days late.
- d) The C4 report for the month of August due on 9/11/2017 was not submitted until 9/17/2017, 6 days late.

## 2. Failing to list debt. (Potential Violation of RCW 42.17A)

The following expenditures were not reported as debt in a timely manner. Whether this was done out of negligence or intent, it results in serious advantage over an opponent in the long term.

- a) The following expenditures should have been listed as debt on the C4 covering the time period of June 2017:

PROGRESSIVE STRATEGIES	PROGRESSIVE STRATEGIES	PROGRESSIVE STRATEGIES
7/3/2017	7/3/2017	7/3/2017
\$2,285.65	\$500.00	\$479.34
YARD SIGNS, STAKES, SCREWS	CONSULTING FEE	PRINTING, LOGO DESIGN

- b) Approximately \$2000+ debt to progressive strategies for “doorbelling cards” was not reported on the 8/10/2017 C4 covering the month of July as required by law. This is over 30 days late.
- c) The campaign has failed to report contractual debt owed to Progressive Strategies for consulting work they perform on the campaign.

## 3. Failing to report in-kind contributions potentially on at least 4 occasions. (Violation of RCW 42.17A.235)

- a) Domain registration fee for website (registered on 5/11/2017).
- b) Professional videography and editing fees for the campaign videos featured on her website.
- c) Professional website design.

## 4. Not itemizing expenditures. (Violation of RCW 42.17A.235)

- a) The following expenditures do not include the sub vendor for the items purchased:

PROGRESSIVE STRATEGIES	PROGRESSIVE STRATEGIES
7/3/2017	7/3/2017

\$2,285.65  
YARD SIGNS, STAKES,  
SCREWS

\$479.34  
PRINTING, LOGO DESIGN

**5. Only individuals listed as committee members may authorize expenditures. (Potential Violation of RCW 42.17A.425)**

Progressive Strategies is purchasing items from sub vendors for the campaign, so they must be listed as a committee member on the C1, if they are authorizing these expenditures. The PDC should investigate if in fact Progressive Strategies is illegally authorizing expenditures for the Balliett campaign, in violation of state law.

**6. It appears inaccurate reports have been certified. (Potential Violation of RCW 42.17A.235 (7)).**

The C4 filed covering the month of July shows \$-622.90 "cash on hand." It is highly unlikely that a bank would allow a new campaign account to maintain a negative balance. This C4 was certified on 8/10/2017 and amended 9/1/2017 without correcting this serious error. Since the campaign is possibly certifying inaccurate reports, the PDC should issue a subpoena for campaign records to determine Balliett's committee is following the rules set out by **RCW 42.17A.235** and preserving financial records. If the PDC determines this was a malicious act, this case should be immediately referred to the Attorney General's office.

**7. Failing to show sponsor ID on political Advertising. (Potential Violation of RCW 42.17A.320).**

Balliett's Facebook page apparently fails to include sponsor identification.