



State of Washington

PUBLIC DISCLOSURE COMMISSION

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**Public Disclosure Commission Statement of Understanding**

**Tim Sheldon: PDC Case 42394**

I Tim Sheldon, hereby acknowledge that I:  
(Printed Name of Candidate)

Failed to timely disclose the required description or purpose and sub-vendor breakdown information for 2018 Campaign expenditures made to FDR Services and other individuals for consulting services, paid political advertising including television media buys, social media buys, direct mail, and yard sign assembly, placement, and maintenance, in violation of RCW 42.17A.240. My Campaign, the Committee to Elect Tim Sheldon (Campaign) disclosed those expenditures on initial and amended Campaign Summary Contribution and Expenditure Reports (C-4 reports) as detailed below:

1. 21-Day Pre-Primary Election C-4 report:

On July 17, 2018, the Campaign timely filed the 21-Day Pre-Primary Election C-4 report disclosing three expenditures made to FDR Services totaling \$27,000 listing the description "Management/Consulting Service"; a \$15,000 expenditure made to Andy Pistay Media with the description "Advertising"; and eight expenditures made to Stewart Hartman and Terry Wright totaling \$5,208 for "Management/Consulting Service".

On January 31, 2019, the Campaign filed an amended 21-Day Pre-Primary Election C-4 report listing the descriptions and sub-vendor breakdown for the FDR expenditures as \$13,000 for "Retainer Fee (per contract) for Strategic and Management Services"; \$10,000 for "Social media purchase Facebook ads 7/2 through 7/20/2018"; \$2,000 for social media design costs; and \$2,000 for the "Monthly management fee."

The \$15,000 expenditure to Andy Pistay Media was for a Comcast TV buy for the period 7/4 through 7/15/2018, and the \$5,208 in expenditures made to Stewart Hartman and Terry Wright was for yard sign assembly, placement, and maintenance. The information was disclosed 199 days late, and 86 days after the November 6, 2018 general election date.

2. 7-Day Pre-Primary Election C-4 report:

On August 1, 2018, the Campaign timely filed the 7-Day Pre-Primary Election C-4 report disclosing a \$22,000 expenditure made to FDR Services for "Management and Consulting Services" and four expenditures made to Stewart Hartman and Terry Wright totaling \$2,377 for "Management/Consulting Service".

On January 31, 2019, the Campaign filed an amended 7-Day Pre-Primary Election C-4 report listing the descriptions and sub-vendors breakdown for the FDR expenditures as \$4,000 for "Social media purchase Facebook ads 7/20 through 8/6/2018"; \$10,000 for a Comcast TV buy for the period 7/20 through 8/6/2018 "; and \$8,000 for "Broadcast TV ads 7/20 through 8/6/2018." The \$2,377 in expenditures made to Stewart Hartman and Terry Wright was for yard sign assembly, placement, and maintenance. The information was disclosed 184 days late, and 86 days after the November 6, 2018 general election date.

3. Post Primary Election C-4 report:

On September 9, 2018, the Campaign timely filed the Post Primary Election C-4 report disclosing two expenditures to FDR Services totaling \$7,300 for "Management and Consulting Services" and seven expenditures made to Stewart Hartman, Terry Wright, Ken Van Busker, and Ron Sharper totaling \$4,542 for "Management/Consulting Service".

On January 31, 2019, the Campaign filed an amended Post Primary Election C-4 report listing the descriptions and sub-vendors breakdown for the FDR expenditures as \$1,300 for "graphic design for mailer Caroleann Graphic Design" and \$6,000 for the "monthly management fee", and the seven expenditures made to Stewart Hartman, Terry Wright, Ken Van Busker, and Ron Sharper were for yard sign assembly, placement, and maintenance. The information was disclosed 143 days late, and 86 days after the November 6, 2018 general election date.

4. 21-Day Pre-General Election C-4 report:

On October 16, 2018, the Campaign timely filed the 21-Day Pre-General Election C-4 report disclosing three expenditures made to FDR Services totaling \$74,000, listing the description as "Management/Consulting Service", and 13 expenditures totaling \$9,569 made to Stewart Hartman, Terry Wright, Ken Van Busker, and Ron Sharper for "Management/Consulting Service".

On January 31, 2019, the Campaign filed an amended 21-Day Pre-General Election C-4 report listing the descriptions for the 9,569 408 in expenditures made to Stewart Hartman, Terry Wright, Ken Van Busker, and Ron Sharper was for yard sign assembly, placement, and maintenance.

The \$74,000 in expenditures made to FDR Services listed the descriptions and sub-vendor breakdown as \$25,000 for a Comcast TV buy through "View Media Services"; \$10,000 to design and have Capitol City Press print a mailer; \$29,516 for a Comcast TV buy for the period 10/1 through 10/22/2018; \$5,484 to pay Capitol City Press the remaining balance on a print order; and \$4,000 for the general election retainer fee. The information was disclosed 107 days late, and 86 days after the November 6, 2018 general election date.

5. 7-Day Pre-General Election C-4 report:

On October 30, 2018, the Campaign timely filed the 7-Day Pre-General Election C-4 report disclosing two expenditures made to FDR Services totaling \$20,000, listing the description as "Management/Consulting Service", and eight expenditures totaling \$5,776 made to Stewart Hartman, Terry Wright, Ken Van Busker, and Ron Sharper for "Management/Consulting Service".

On January 31, 2019, the Campaign filed an amended 7-Day Pre-General Election C-4 report listing the descriptions and sub-vendor breakdown for the \$20,000 in expenditures made to FDR Services as \$10,000 for a "Social media purchase via Theisen Design"; \$6,000 for an additional "Social media purchase via Theisen Design of Seattle, Facebook 10/19 through 10/25/2018; and \$4,000 for the monthly management fee. The \$5,776 in expenditures made to Stewart Hartman, Terry Wright, Ken Van Busker, and Ron Sharper was for yard sign assembly, placement, and maintenance. The information was disclosed 93 days late, and 86 days after the November 6, 2018 general election date.

6. Post-General Election C-4 report:

On December 10, 2018, the Campaign timely filed the Post-General Election C-4 report disclosing two expenditures made to FDR Services totaling \$10,000 and listing the descriptions as "Media buy" and "Media advertisements."

On January 31, 2019, the Campaign filed an amended Post-General Election C-4 report listing the descriptions and sub-vendors breakdown for the \$10,000 in expenditures made to FDR Services as \$5,000 for a "Comcast media purchase via View Media 11/1 through 11/5/2018, and \$5,000 for a "Social media purchase Facebook 11/2 through 11/6/2018. The information was disclosed 52 says late.

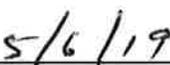
I, Tim Sheldon, would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding (Brief Enforcement Hearing) being scheduled by Public Disclosure Commission (PDC) staff.

Therefore, in lieu of PDC staff scheduling a Brief Enforcement Hearing, I am completing this Statement of Understanding, and enclosing a check or money order in the amount of \$900 as a penalty payment in this matter.

The \$900 penalty being assessed includes six acknowledged violations of RCW 42.17A.240 for failing to timely disclose the required sub-vendor breakdown and sufficiently describe the purpose for Campaign expenditures made to FDR Services and other individuals, in accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143.

I understand that by completing this Statement of Understanding, I am acknowledging the four violations of RCW 42.17A set forth above and I am waiving my right to a hearing in this matter.

  
\_\_\_\_\_  
Tim Sheldon

  
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Date Signed

Please make your check or money order payable to the **“Washington State Treasurer”** and be sure to include the PDC Case number in the memorandum field, and mail or deliver this Statement of Understanding along with your payment/check to the PDC at the following address:

**Public Disclosure Commission  
711 Capitol Way, Room 206  
PO Box 40908  
Olympia, WA 98504-0908**