Complaint Description

Glen Morgan (Thu, 17 Oct 2019 at 4:24 PM)

To whom it may concern,

It has come to my attention that the Spokane Firefighters PAC has egregiously violated Washington State's campaign finance laws (**RCW 42.17A**) during the current political cycle.

1) Failure to report mystery secret contributions or deposits of the same. Failure to identify the identities of the secret donors. (Violation of RCW 42.17A.240, .235, .220)

It appears that the Spokane Firefighters PAC are secretly and anonymously filtering large sums of illegal secret contributions through this PAC. For example:

- On their C4 filed on June 10, 2019 (See **PDC Tracking #100909986**), the final amount of funds held by this PAC (line #18 & line #20) indicates \$14, 315. On line #8 they indicate they had \$21, 315. However, on their next C4 filed on July 18, 2019 (See **PDC Tracking # 100918343**), this PAC now suddenly has \$92,008.28. Yet, according to their own report on this same C4 they only deposited \$4,285 during the time between the previous C4 and this one. **At a minimum, this is a discrepancy of \$66,408.28 which suddenly and conveniently appeared out of thin air** (or possibly \$73,408.28 depending on whether they are correctly referencing their line #18 or line #8 numbers in the next sequential C4). There is no information provided to the PDC or the public as to where this mystery \$66,408.28 \$73,408.28 came from. **No donors are identified and no deposits for these funds are recorded.**
- This strange mystery donation cash was compounded the next C4 (See **PDC Tracking # 100921496**) filed on July 31, 2018 where another \$4,240 appeared in the cash on hand column (line 18 & 20) without any deposit history documenting how this money appeared in their bank account (See zero deposits recorded on this C4)
- In reviewing the C3s filed by this PAC, there is no supporting documentation for the secret mystery cash which suddenly appeared in their bank account. As a general rule, the contributions each month are fairly regular with an average of around \$4200 being deposited in small contributions, presumably from individual contributions from members. The sudden, large influx of cash (larger than the total annual cumulative contributions to this PAC from the firefighters who regularly contribute).

It should be noted that the individuals behind this PAC are part of the same group who have been caught breaking the campaign finance laws on a regular basis (See **PDC enforcement Case #9059** - \$10,000 fine for concealing the source of contributions of over \$93,000 until long after the 2015 Spokane election was over – see attached letter from the PDC). Also see **PDC Enforcement Case #2218**) where they were fined \$50.

This previous iteration of this Pac also attempted to avoid paying the fine in the Enforcement Case #9059, which necessitated Peter Lavalle, the Executive Director of the PDC to send a formal letter to them requiring them to pay the fine, which they finally did after this warning letter (see attached).

Unfortunately, this group has proven a repeated history of willfully and flagrantly violating the campaign finance laws without much concern of any consequences for their actions. They are making contributions to the same candidates they supported in their previous PAC. Perhaps they can be encouraged to comply with the law for a change, as unlikely as that outcome appears based on previous actions by these folk.

Regardless, the dark, secretive cash flowing into this Pac must be disclosed to the public and reported correctly and accurately to the PDC.

Let me know if you need any additional information.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public should be able to find out who secret dark money donors are who put \$66,000 + into local Spokane elections. The public has a right to know the truth, regardless how much the people running this PAC try to hide the truth from them.

List of attached evidence or contact information where evidence may be found.

All either referenced by tracking number or attached as indicated in the complaint itself.

List of potential witnesses with contact information to reach them.

Everyone involved in this PAC. They will probably try to use the Iglitzen law firm again to run interference for their violations, but eventually they might want to just try to follow the law or pretend like they even care to try following the law.

Complaint Certification:

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



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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

November 8, 2017

Sent electronically by email to:

Danielle Franco-Malone: franco@workerlaw.com

Randy Marler: spokaneforhonestgovernment@gmail.com

Danielle Franco-Malone Schwerin Campbell Barnard Iglitzin & Lavitt LLP 18 West Mercer St, Ste 400 Seattle, WA 98119

Subject: Commission Final Order, Spokane for Honest Government, PDC Case 9059

Dear Ms. Franco-Malone:

Enclosed is a copy of the Public Disclosure Commission's Final Order Imposing Fine that was entered in the above-referenced case concerning Spokane for Honest Government.

At its October 26, 2017 meeting, the Commission found Spokane for Honest Government in violation of RCW 42.17A.260, 42.17A.305, and 42.17A.240, and assessed a total civil penalty of \$10,000, with \$3,000 suspended on the condition that the Respondent is in compliance with all current reporting requirements, has no further violations of law or PDC rules for four years from the date of this Order, and pays the non-suspended portion of the penalty within 90 days from the date of this Order.

Please make your \$7,000 check or money order payable to the WA State Treasurer, and mail the payment to the address listed below:

WA State Treasurer - Public Disclosure Commission Financial Office PO Box 41465 Olympia, WA 98504-1465

In the event Spokane for Honest Government fails to meet any of the above terms of this order, the entire \$10,000 penalty will become immediately due without any further intervention of the Commission.

Spokane for Honest Government Hearing Order Cover Letter PDC Case 9059 Page 2

If you have questions, please contact Phil Stutzman at (360) 664-8853; toll free at (877) 601-2828 or by email at phil.stutzman@pdc.wa.gov.

Sincerely,

Philip E. Stutzman

Sr. Compliance Officer

Enclosure: Final Order

BEFORE THE PUBLIC DISCLOSURE COMMISSION OF THE STATE OF WASHINGTON

IN RE THE MATTER OF ENFORCEMENT ACTION AGAINST

SPOKANE FOR HONEST GOVERNMENT

Respondent.

PDC CASE NO. 9059

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER IMPOSING FINE

I. INTRODUCTION

This matter came before the Washington State Public Disclosure Commission on October 26, 2017, at the PDC office, Room 206, Evergreen Plaza Building, 711 Capitol Way, Olympia, Washington. The matter was held in accordance with Chapters 34.05 and 42.17A RCW and Chapter 390-37 WAC.

Commissioners present included Anne Levinson, Commission Chair (presiding); Jack Johnson, Commission Vice-Chair; and Commissioners John Bridges, Katrina Asay, and David Ammons. Assistant Attorney General Chad Standifer presented the matter on behalf of PDC Staff. Respondent Spokane for Honest Government (SFHG) was represented through its attorney Danielle Franco-Malone, who participated by phone. Also present were Assistant Attorney General Scott Douglas representing the Commission; PDC Executive Director Peter Lavallee; and PDC staff member Jana Greer as recorder of the proceedings. The proceeding was open to the public and recorded.

The PDC had before it the following materials:

1	п
	1. Com
2	2. Com
3	exhibits
4	3. Form
5	4. SFH0
6	
7	5. C-6 r
8	6. C-6 r
9	7. C-6 r
	8. C-6 r
10	9. Sumr
11	10. C-4
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 Commission Staff's Wit 	ness and Exhibit List	submitted July 18,	2017
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- 2. Complaint received on October 15, 2016 from Gretchen McDevitt against SFHG, with exhibits (Exhibit 1);
- 3. Form C-l pc filed by SFHG on May 1, 2015 (Exhibit 2);
- 4. SFHG's response to complaint dated October 25, 2016 (Exhibit 3);
- 5. C-6 report filed by SFHG on October 16, 2015 (Exhibit 4);
- 6. C-6 report filed by SFHG on October 22, 2015 (Exhibit 5);
- 7. C-6 report filed by SFHG on October 27, 2015 (Exhibit 6);
- 8. C-6 report filed by SFHG on June 20, 2016 (Exhibit 7);
- 9. Summary of late-filed C-6 reports filed by SFHG (Exhibit 8);
- 10. C-4 report for period of September 1, 2015 October 12, 2015 (Exhibit 9);
- 11. Report of Investigation, PDC Case 9059, dated June 12, 2017 (Exhibit 10);
- 12. Addendum to Report of Investigation, PDC Case 9059, dated June 29, 2017 (Exhibit 11);
- 13. Amended Notice of Administrative Charges; and
- 14. Table of comparable PDC cases listing violations and penalties assessed.

The hearing concerned allegations that SFHG 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, and violated RCW 42.17A.240 by failing to adequately describe the purpose of \$50,000 of expenditures.

II. PROCEDURAL HISTORY

This matter first came before the Commission on July 27, 2017, at which time a proposed stipulation was presented which included a proposed penalty of \$10,000 with \$5,000 suspended. The Commission voted to reject the stipulation on the grounds that the penalty was insufficient for the violations alleged. At a subsequent pre-hearing conference held on September 7, 2017, the matter was set for evidentiary hearing before the Commission.

On September 29, 2017, counsel for SFHG sent a letter to AAG Standifer and AAG Douglas stating that SFHG would not participate in the evidentiary hearing, but would honor the terms of the stipulated agreement previously rejected by the Commission if the Commission were to accept that stipulation. Counsel for SFHG further stated that if a monetary penalty was ordered in excess of what had been proposed in the stipulation, SFHG intended to cease operations as a political committee.

Counsel for Respondent SFHG presented no testimony and submitted no exhibits. AAG Standifer submitted eleven exhibits, listed above as document 2 through 12. Ms. Franco-Malone was asked if she had any objections to admission of Staff's exhibits. She stated that she had not reviewed the exhibits but had no objection to their admittance. Staff's Exhibits 1 through 11 were admitted into evidence. Chair Levinson made note of the September 29, 2017 letter sent by counsel for SFHG to AAGs Standifer and Douglas. The Chair had been provided a copy of the letter prior to the hearing, and asked the parties if there was any objection to it being included in the record. The letter was admitted into evidence as Exhibit 12 without objection.

Philip Stutzman, Senior Compliance Officer, was sworn in and presented testimony on behalf of PDC Staff. Mr. Stutzman's testimony included discussion of three prior PDC cases with fact patterns comparable to this case, and the penalties assessed therein. In all three comparable cases, the C-6 reports were filed untimely but within roughly one month or less of the required reporting date.

Each party was provided the opportunity to make a closing argument. AAG Standifer summarized the evidence presented, and addressed the factors in this case which warrant a higher penalty than had been assessed by the Commission in three specific comparable PDC cases with similar fact patterns. SFHG failed to timely file seven C-6 reports, exceeding the number of late-filed reports in the comparable cases. The late reports filed by SFHG were between 212 and 283 days late, far exceeding the timeframe in the comparable cases, where the latest-filed report was

42 days late. SFHG did not file the required C-6 forms until well after the election in which the expenditures were made, thus depriving the public of material information about who was making the expenditures at the time when voters were making their decisions and casting their ballots. The amount unreported until after the election - \$94,134.75 – is a significant amount of money, especially for a local municipal election. Staff reiterated their recommendation that a penalty of \$10,000 be assessed, but did not make a specific recommendation on whether or how much of the penalty should be suspended.

III. FINDINGS OF FACT

- 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 with the PDC, 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-l pc) on May 1, 2015, listing Deborah Gaddess, Campaign Manager; Melissa Olson, Treasurer; and Rich Bruce, Renee Barkart, and Randy Marler, Committee Members.
- 4. On October 16, 2015, Spokane for Honest Government paid Lawton Printing \$2,938.00 for mailers supporting Karen Stratton for Spokane City Council.
- 5. On October 22, 2015, Spokane for Honest Government paid Lawton Printing \$2,512.16 for mailers supporting Lori Kinnear.
- 6. 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).

7. Melissa Olson, Treasurer for Spokane for Honest Government, filed all three C-6 reports related to the October 16, 22, and 27, 2015 expenditures in a timely manner, within 24 hours of presenting or mailing the ads and communications to the public.

- 8. On June 20, 2016, Spokane for Honest Government filed a C-6 report disclosing multiple independent expenditures and electioneering communications totaling \$94,134.75 made between September and November 2015, supporting Lori Kinnear and Karen Stratton. 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, and more than seven months after the 2015 election. The expenditures were primarily for political ads in the form of broadcast advertising and direct mail pieces.
- 9. 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.

IV. CONCLUSIONS OF LAW

- 1. Spokane for Honest Government violated RCW 42.17A.260 and .305 by failing to timely file C-6 reports disclosing expenditures for political advertising and electioneering communications.
- 2. Spokane for Honest Government violated RCW 42.17A.240 by failing to adequately describe the purpose of \$50,000 of expenditures as required in RCW 42.17A.240 and WAC 390.16.037.

1 V. **ORDER** 2 Spokane for Honest Government is hereby ordered to pay a penalty of \$10,000 of which 3 \$3,000 is suspended on the condition that the Respondent is in compliance with all current 4 reporting requirements, has no further violations of law or PDC rules for four years from the date 5 of this Order, and pays the non-suspended portion of the penalty within 90 days from the date of 6 this Order. The Executive Director is authorized to enter this Order on behalf of the Commission. 7 SO ORDERED this 2 day of November, 2017. 8 9 WASHINGTON STATE PUBLIC 10 DISCLOSURE COMMISSION 11 FOR THE COMMISSION: 12 This order sent by mail to: 13 Executive Director Danielle Franco-Malone 14 Schwerin Campbell Barnard Iglitzin & Lavitt LLP 15 18 West Mercer St, Ste 400 1, Phil Stutzman certify that I emailed a Seattle, WA 98119 copy of this order to the Respondent at his respective 16 email address. And by email to: 17 franco@workerlaw.com 18 19 20 21 22 23 24 25 26



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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

December 15, 2017

Sent electronically by email to:

Danielle Franco-Malone: franco@workerlaw.com

Randy Marler, Campaign Manager: spokaneforhonestgovernment@gmail.com

Brandon Bacon, Treasurer: spokaneforhonestgovernment@gmail.com

Rich Bruce, Committee Member, <u>spokaneforhonestgovernment@gmail.com</u>
Renee Barkart, Committee Member, <u>spokaneforhonestgovernment@gmail.com</u>
Deborah Gaddess, Committee Member, <u>spokaneforhonestgovernment@gmail.com</u>

Danielle Franco-Malone Schwerin Campbell Barnard Iglitzin & Lavitt LLP 18 West Mercer St, Ste 400 Seattle, WA 98119

Subject: Public Disclosure Commission's Final Order - Spokane for Honest Government, PDC Case 9059

Dear Ms. Franco-Malone:

The Public Disclosure Commission's Final Order in PDC Case 9059 assessed a total civil penalty of \$10,000, with \$3,000 suspended on the condition that the Respondent — your client, Spokane for Honest Government — is in compliance with all current reporting requirements, has no further violations of law or PDC rules for four years from the date of the Order, and pays the non-suspended portion of the penalty within 90 days from the date of the Order. The Commission did not require immediate payment, as stated in your November 27, 2017 letter (copy enclosed), but allowed the committee 90 days to make payment, giving Spokane for Honest Government until February 6, 2018 to make payment. The Committee's officers could also ask for additional time to pay the penalty, or ask for a payment plan.

Conditions for Suspended Penalty

Spokane for Honest Government must comply with all current reporting requirements to have \$3,000 of the penalty suspended. I am enclosing a copy of C-4 Report No. 100800480, covering the period 10/31/17 to 11/30/17, filed November 13, 2017. The report is certified by Spokane for Honest Government Treasurer Brandon Bacon in accordance with RCW 42.17A.240. By submitting the report, Mr. Bacon stated, "I

Spokane for Honest Government Letter Concerning Commission's Final Order PDC Case 9059 Page 2

certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge." The report is marked as a Final Report. However, this C-4 report is not accurate because it does not include a Schedule B, which in Part 3 requires the filer to show outstanding debts of more than \$250.00.

RCW 42.17A.240(8). In addition, the C-4 report does not reflect any debt on line 19 of the report, as required by RCW 42.17A.240(8). Spokane for Honest Government had an outstanding debt during the period covered by this report of \$7,000.00 owed to the State of Washington for a penalty assessed by the Commission on October 26, 2017 in PDC Case 9059. Spokane for Honest Government was notified of this outstanding debt on November 8, 2017 by email and U.S. mail, and had a responsibility to inform its treasurer so Mr. Bacon could file an accurate report. Failure to amend this C-4 report could put the committee, and the committee's treasurer or other officers individually, at risk of being in violation of RCW 42.17A.240(8).

Procedures to "wind down operations" and no longer function as a political committee

In your November 27, 2017 letter, you stated that Spokane for Honest Government has complied with the procedures provided by the Public Disclosure Commission to wind down operations, and is no longer a political committee. RCW 42.17A.005(37).

Staff disagrees with your assertion that Spokane for Honest Government has complied with the procedures provided by the Public Disclosure Commission to wind down operations and stop filing reports. RCW 42.17A.235(8) states: "When there is no outstanding debt or obligation, the campaign fund is closed, and the campaign is concluded in all respects or in the case of a political committee, the committee has ceased to function and has dissolved, the treasurer shall file a final report. Upon submitting a final report, the duties of the treasurer shall cease and there is no obligation to make any further reports." (Emphasis added). Spokane for Honest Government has on-going reporting obligations, except that RCW 42.17A.235(2)(c) states that on the 10th day of the month in which no other reports are required to be filed under RCW 42.17A.235, C-4 reports are only required to be filed if the committee has received contributions or made expenditures that exceed \$200 during the preceding calendar month.

Your November 27, 2017 letter also stated that Spokane for Honest Government chose to honor the intent of those who contributed to it, to spend those funds in support of candidates in the November 2017 general election. You stated that Spokane for Honest Government went ahead and spent what little money it had in the manner its donors intended, and as a result, by the time the election was over, it no longer had the funds that would have been necessary to pay the fine imposed on it by the Commission, and had no reasonable way of obtaining such funds.

I am sure the committee's supporters also intend for the committee to comply fully with the law. It appears from the record that Spokane for Honest Government has supporters that could help it meet its financial obligations before it winds down its operations and is no longer a political committee. Spokane for Honest Government Letter Concerning Commission's Final Order PDC Case 9059 Page 3

Please contact me if you would like to discuss this matter. You can contact me by phone at (360) 664-2735, or by email at peter.lavallee@pdc.wa.gov.

Sincerely

Executive Director

Enclosures:

C-4 Report Covering 10/31/17 to 11/30/17 November 27, 2017 letter

September 29, 2017 letter



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 100909986

06-10-2019

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

POKANE FIREFIGHTE	RS UNION .	PAC					
Mailing Address 11 E BALDWIN AVE					City SPOKANE, WA		
Zip + 4 9207	Office S	Sought (Cand	didates)	Election Date 2019	*For PACs, Parties & Ca this report period, did the con		
•	last C-4)	To (ei	nd of period)	Final Report?	expenditure (i.e., an expens		
Covered 05/	01/19	05	/31/19	Yes No X	supporting or opposing a stat	e or loca	<u>al candidate</u> ?
RECEIPTS				·	*See next page	Yes	No
Previous total cash an (if beginning a new ca	d in kind contrib mpaign or calen	utions (From dar year, se	n line 8, last C-4 e instruction bo	4) ooklet)		\$	\$17,030.00
2. Cash received (From	ine 2, Schedule	A)			\$ \$4,285.00	-	
3. In kind contributions re	eceived (From lin	ne 1, Schedu	ule B)		\$0.00	-	
4. Total cash and in kind	contributions re	ceived this p	eriod (Line 2 p	lus 3)			\$4,285.00
5. Loan principal repaym	ents made (Fror	m line 2, Sch	nedule L)		\$0.00	-	
6. Corrections (From line	1 or 3, Schedul	e C)		Show + or	(-) \$0.00	=	
7. Net adjustments this p	eriod (Combine	line 5 & 6)			Show + or (-)		\$0.00
8. Total cash and in kind	contributions du	ıring campai	gn (Combine li	nes 1, 4 & 7)			\$21,315.00
9. Total pledge payments	s due (From line	2, Schedule	e B)	\$0.00			
EXPENDITURES							
Previous total cash an (If beginning a new ca	d in kind expend mpaign or calen	ditures (Fron dar year, se	n line 17, last C e instruction bo	-4) ooklet)			\$6,000.00
11. Total cash expenditure	es (From line 4,	Schedule A)			\$1,000.00	<u>)</u>	
12. In kind expenditures (goods & services	s) (From line	1, Schedule B)	\$0.00	l	
13. Total cash and in kind	expenditures m	ade this peri	od (Line 11 plu	s line 12)			\$1,000.00
14. Loan principal repaym	ents made (Fror	m line 2, Sch	nedule L)		\$0.00	<u>)</u>	
15. Corrections (From line	2 or 3, Schedul	e C)		Show + or	(-) \$0.00	<u> </u>	
16. Net adjustments this p	eriod (Combine	lines 14 & 1	5)		Show + or (-)		\$0.00
17. Total cash and in kind	expenditures du	uring campai	gn (Combine li	nes 10, 13 and 16)			\$7,000.00
CANDIDATES ONLY		Name not	CASH SUMM	IARY			
Won L	ost Unopposed	d on ballot			17)ance(s) plus your petty cash balance.]		\$14,315.00
Primary election General election			19. Liabilities:	: (Sum of loans and de	bts owed)		\$0.00
Treasurer's Daytime Telep	hone No.:	<u> </u>					
(509)484-5598			20. Balance (Surplus or deficit) (Line	18 minus line 19)		\$14,315.00
	at the information h	nerein and on	accompanying so	chedules and attachments	is true and correct to the best of my	knowled	ge.
Candidate's Signature		Date		Treasurer's Signatu	re		Date
				THAD FRATER			06/10/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE

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

Report Date

					05/01/19	05/31/19
1. CASH RECEIPTS	(Contributions) whic	h have been reported or	C3. List each dep	osit made since last C4	report was submitted	•
Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
05/06/2019	\$115.00					
05/13/2019	\$4,170.00					
2. TOTAL CASH REC	CEIPTS			Enter a	also on line 2 of C4	\$4,285.0

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;
- When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and 2)
- 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		
05/15/19	PEOPLE TO ELECT BEN STUCKART PO BOX 40041 SPOKANE , WA 99220		general contribution		\$1,000.00
		1	Total from attached page	s \$	\$0.00

Enter also on line 11 of C4

\$1,000.00



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 100918343

07-18-2019

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

SPOKANE FIREFIGHTERS UN	NION PAC						
Mailing Address 911 E BALDWIN AVE					City SPOKANE, WA		
Zip + 4 99207	Office Sought (Cand	lidates)	Election 2019	on Date	*For PACs, Parties & Ca		
Report Period From (last C-4)	To (er	nd of period)	Final	Report?	expenditure (i.e., an expense		
Covered 06/01/19	07	/15/19	Yes	No X	supporting or opposing a stat	e or local c	andidate?
RECEIPTS					*See next page	Yes	No
Previous total cash and in kind (if beginning a new campaign	d contributions (From or calendar year, see	line 8, last C-4) instruction boo	klet)			\$	\$92,008.28
2. Cash received (From line 2, S	chedule A)				···· \$ \$4,285.00	-	
3. In kind contributions received	(From line 1, Schedu	le B)			\$0.00	.	
4. Total cash and in kind contribu	utions received this p	eriod (Line 2 plu	ıs 3)				\$4,285.00
5. Loan principal repayments ma	de (From line 2, Sch	edule L)			\$0.00	<u>-</u>	
6. Corrections (From line 1 or 3,	Schedule C)			Show + or (\$0.00	<u>-</u>	
7. Net adjustments this period (C	combine line 5 & 6)				Show + or (-)		\$0.00
8. Total cash and in kind contribu	utions during campai	gn (Combine line	es 1, 4 & 7)			\$96,293.28
9. Total pledge payments due (F	rom line 2, Schedule	B)		\$0.00			
EXPENDITURES							
Previous total cash and in kind (If beginning a new campaign	d expenditures (From or calendar year, see	line 17, last C-4 e instruction boo	4) oklet)				\$7,000.00
11. Total cash expenditures (From	n line 4, Schedule A)				\$42,000.00	!	
12. In kind expenditures (goods &	services) (From line	1, Schedule B)			\$0.00	1	
13. Total cash and in kind expend	itures made this peri	od (Line 11 plus	line 12)				\$42,000.00
14. Loan principal repayments ma	de (From line 2, Sch	edule L)			\$0.00	<u>!</u>	
15. Corrections (From line 2 or 3,	Schedule C)			Show + or (\$0.00	<u>-</u>	
16. Net adjustments this period (C	combine lines 14 & 19	5)			Show + or (-)		\$0.00
17. Total cash and in kind expend	itures during campai	gn (Combine line	es 10, 13 a	ınd 16)			\$49,000.00
CANDIDATES ONLY Won Lost U	Name not nopposed on ballot	CASH SUMMA 18. Cash on ha		minus line	17)		\$47,293.28
Primary election					nce(s) plus your petty cash balance.]		-
General election		19. Liabilities:	(Sum of lo	ans and del	ots owed)		\$0.00
Treasurer's Daytime Telephone No	D.:	20. Balance (S	urplus or d	eficit) (Line	18 minus line 19)		\$47,293.28
CERTIFICATION: I certify that the info		accompanying sch				knowledge.	
Candidate's Signature	Date		Treasure	r's Signatur	e		Date
			THAD E	RATER		(7/18/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE

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

Report Date

					06/01/19	07/15/19
1. CASH RECEIPTS	(Contributions) whic	h have been reported or	n C3. List each dep	oosit made since last C4	report was submitted	l.
Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
06/06/2019	\$115.00					
06/10/2019	\$4,170.00					
2. TOTAL CASH REC	CEIPTS	•		Enter a	Iso on line 2 of C4	\$ \$4.285.0

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;
- When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and 2)
- 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..
- 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	
06/11/19	CITIZENS FOR LIBERTY AND LABOR po box 18845 spokane, WA 99228		general contribution	\$40,000.00
06/15/19	KEVIN HAUGHTON FOR SPOKANE FIRE 1535 n christensen rd medical lake, WA 99022		GENERAL CONTRIBUTION	\$1,000.00
06/15/19	FIRENDS TO ELECT JERRAL HAYNES po box 4292 spokane, WA 99220		general contribution	\$1,000.00
		1	Total from attached nagar	ф фо оо

Total from attached pages

\$0.00

Enter also on line 11 of C4

\$42,000.00



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 100921496

07-31-2019

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

SPOKANE FIREFIGHTERS T	UNION PAC						
Mailing Address					City		
911 E BALDWIN AVE	0.00			+	SPOKANE, WA		
Zip + 4 99207	Office Sought (Cand	didates)	Election Da	ate	*For PACs, Parties & Cathis report period, did the co		
Report Period From (last C-	-4) To (ei	nd of period)	Final Repo	rt?	expenditure (i.e., an expens	se not consi	dered a contribution)
Covered 07/16/1	.9 07	/29/19	Yes No	х	supporting or opposing a sta	ite or local c	andidate?
RECEIPTS			1		*See next page	Yes	No
Previous total cash and in ki (if beginning a new campaig	nd contributions (From n or calendar year, se	n line 8, last C-4) e instruction boo	klet)			· \$	\$100,533.28
2. Cash received (From line 2,	Schedule A)				··· <u>\$</u> \$0.00	_	
3. In kind contributions received	d (From line 1, Schedu	ule B)			\$0.00	<u>-</u>	
4. Total cash and in kind contri	butions received this p	eriod (Line 2 plu	ıs 3)			•	\$0.00
5. Loan principal repayments n	nade (From line 2, Sch	nedule L)			\$0.00	<u> </u>	
6. Corrections (From line 1 or 3	3, Schedule C)		Show	v + or (-	\$0.00	_	
7. Net adjustments this period	(Combine line 5 & 6)				Show + or (-)		\$0.00
8. Total cash and in kind contri	butions during campai	gn (Combine line	es 1, 4 & 7)			·	\$100,533.28
9. Total pledge payments due	(From line 2, Schedule	e B)	\$0	.00			
EXPENDITURES 10. Previous total cash and in ki	nd ovponditures /From	a line 17 last C	1)				
(If beginning a new campaig	n or calendar year, se	e instruction boo	klet)				\$49,000.00
11. Total cash expenditures (Fro	om line 4, Schedule A)				\$0.0	<u>0</u>	
12. In kind expenditures (goods	& services) (From line	1, Schedule B)			\$0.0	Ω	
13. Total cash and in kind exper	nditures made this peri	od (Line 11 plus	line 12)			•	\$0.00
14. Loan principal repayments n	nade (From line 2, Sch	nedule L)			\$0.0	<u>0</u>	
15. Corrections (From line 2 or 3	3, Schedule C)		Shov	v + or (-	\$0.00	<u>0</u>	
16. Net adjustments this period	(Combine lines 14 & 1	5)			Show + or (-)		\$0.00
17. Total cash and in kind exper	nditures during campai	gn (Combine line	es 10, 13 and 1	6)			\$49,000.00
CANDIDATES ONLY	Name not	CASH SUMMA	ARY				
Won Lost	Unopposed on ballot				7)		\$51,533.28
Primary election							
General election	<u> </u>	19. Liabilities:	(Sum of loans a	and deb	ts owed)	-	\$0.00
Treasurer's Daytime Telephone I	NO.:	20. Balance (S	urplus or deficit) (Line	18 minus line 19)		\$51,533.28
CERTIFICATION: I certify that the in	nformation herein and on	L accompanving sch	edules and attach	ments is	s true and correct to the best of m	y knowledae.	
Candidate's Signature	Date	, ,g	Treasurer's S			,	Date
			THAD FRAT	ľER			07/31/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

2	
4	

Ca	ndidate or Committee Name (Do not ab	breviate. Use full name.)		Report Date			
						07/16/19	07/29/19	
1.	CASH RECEIPTS (Contribut	ions) whic	h have been reported on C3	List each dep	oosit made since last C4 re	port was submitted.		
Da	te of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits	
2.	TOTAL CASH RECEIPTS				Enter also	on line 2 of C4	\$0.00	
1) 2) 3)	committee, identify the When reporting payments the If expenditures are made do petition, use code "V" a	or earmarl candidate to vendors irectly or i	ked contributions to a candid or committee in the Descript for travel expenses, identify andirectly to compensate a per the following information opting period, and cumulative	date or committo otion block; the traveler ar erson or entity for an attached s	ee or independent expending travel purpose in the Desor soliciting signatures on a heet: name and address of	tures that benefit a scription block; and a statewide initiative of each person/entit	candidate or	
	CODE DEFINITIONS ON NEXT PAGE	I - L B N O	- Contributions (monetary, ir Independent Expenditures - Literature, Brochures, Print - Broadcast Advertising (Rad - Newspaper and Periodical - Other Advertising (yard sig - Voter Signature Gathering	ting dio, TV) Advertising gns, buttons, etc	S - Surv F - Fund T - Trave M - Man S.) W - Wag	age, Mailing Permit eys and Polls Iraising Event Expe el, Accommodation: agement/Consultinges, Salaries, Bene eral Operation and	nses s, Meals g Services fits	

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	
			Total from attached page	, c

al from attached pages	\$ \$0.0
al from attached pages	\$ \$0.0

\$0.00

Enter also on line 11 of C4 \$



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 100930263

09-10-2019

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

SPOKANE FIREFIGHTERS U	NION PAC							
Mailing Address					City			
911 E BALDWIN AVE	Office County (Con-	1: -1 - + \	1			OKANE, WA		
Zip + 4 99207	Office Sought (Cand	lidates)	2019	on Date		r PACs, Parties & Ca report period, did the con		
Report Period From (last C-4	4) To (er	nd of period)	Final	Report?	expe	enditure (i.e., an expens	e not cons	sidered a contribution)
Covered 07/30/1:	9 08	/31/19	Yes	No X	supp	orting or opposing a stat	e or local	<u>candidate</u> ?
RECEIPTS					*See	e next page	Yes	No
Previous total cash and in kir (if beginning a new campaign	nd contributions (From n or calendar year, see	line 8, last C-4) instruction boo	klet)				\$	\$100,533.28
2. Cash received (From line 2, 9	Schedule A)				\$	\$4,185.00	-	
3. In kind contributions received	I (From line 1, Schedu	ıle B)			<u> </u>	\$0.00	-	
4. Total cash and in kind contrib	outions received this p	eriod (Line 2 plu	ıs 3)					\$4,185.00
5. Loan principal repayments m	ade (From line 2, Sch	edule L)			<u> </u>	\$0.00	-	
6. Corrections (From line 1 or 3	, Schedule C)			. Show + o	or (-)	\$0.00	-	
7. Net adjustments this period (Combine line 5 & 6)					Show + or (-)		\$0.00
8. Total cash and in kind contrib	outions during campai	gn (Combine line	es 1, 4 & 7	")	 ¬			\$104,718.28
9. Total pledge payments due (From line 2, Schedule	B)		\$0.00				
EXPENDITURES								
Previous total cash and in kir (If beginning a new campaigr	nd expenditures (From n or calendar year, see	n line 17, last C-4 e instruction boo	4) klet)					\$49,000.00
11. Total cash expenditures (Fro	m line 4, Schedule A)					\$1,000.00	!	
12. In kind expenditures (goods 8	& services) (From line	1, Schedule B)				\$0.00	1	
13. Total cash and in kind expen	ditures made this peri	od (Line 11 plus	line 12)					\$1,000.00
14. Loan principal repayments m	ade (From line 2, Sch	edule L)		•••••	······ <u> </u>	\$0.00	<u>!</u>	
15. Corrections (From line 2 or 3	, Schedule C)			. Show + o	or (-)	\$0.00) -	
16. Net adjustments this period (Combine lines 14 & 1	5)				Show + or (-)		\$0.00
17. Total cash and in kind expen	ditures during campai	gn (Combine line	es 10, 13 a	and 16)				\$50,000.00
CANDIDATES ONLY	Name not	CASH SUMMA		•				\$50,000.00
	Jnopposed on ballot	18. Cash on hand (Line 8 minus line 17)					\$54,718.28	
Primary election		19. Liabilities:	(Sum of lo	ans and d	debts owe	ed)		\$0.00
Treasurer's Daytime Telephone No.: 20. Balance (Surplus or deficit) (Line 18 minus line 19)				nus line 19)		AE4 E10 00		
(509)484-5598								\$54,718.28
CERTIFICATION: I certify that the introduced Candidate's Signature	formation herein and on a Date	accompanying sch		attachment er's Signat		and correct to the best of my	knowledge	e. Date
Candidate's Signature	Date		rieasule	o oigiial	iul C			Dale
			THAD I	FRATER	_			09/10/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE

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

Report Date

					07/30/19	08/31/19
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
08/05/2019	\$4,070.00					
08/06/2019	\$115.00					
2. TOTAL CASH RECEIPTS Enter also on line 2 of C4					\$ \$4,185.00	

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:

- 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;
- When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and 2)
- 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..
- 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
Date Faid	(Name and Address)	Code	and/or Description	- 	Amount
N/A	Expenses of \$50 or less	N/A	N/A		
08/13/19	PEOPLE FOR KAREN STRATTON po box 10636 spokane, WA 99209		general contribution	i	\$1,000.00
			Total from attached page	es \$	\$0.00

Enter also on line 11 of C4

\$1,000.00