

**Respondent Name**

Washington Conservation Voters Action Fund

**Complainant Name**

Glen Morgan

**Complaint Description**

[Glen Morgan](#) reported via the portal Sat, 26, 2019 at 2:04PM

To whom it may concern,

It has come to my attention that Washington Conservation Voters Action Fund PAC has committed egregious, repetitive and serious violations of Washington State's campaign finance laws (**RCW 42.17A**).

**1) Failing to file timely (24hours) Independent Expenditure Reports within 21 days of an election (RCW 42.17A.260(1)(b)(i))**

This well-funded PAC, which has the resources to hire professional compliance, legal, and treasurer support and which is very familiar with Washington State's campaign finance laws for decades of political activity still chose to knowingly break the law. This is all the more shocking considering the fact this professional, corporately funded PAC has recently (earlier this year) received a formal Written Warning issued by the PDC for previous violations of Washington's Campaign Finance Laws (See attached warning letter – **PDC Enforcement Case #42958**).

Despite this warning, despite their resources, and despite their experience, they chose to break the law again.

Specifically, this PAC filed two different Independent Expenditure Reports during the 2019 election for a local political campaign in Washington State. In total, these two C6s detail \$40,000 of political advertising, which is a substantial sum in a local election, and they spent this money within the crucial 21 days of an election. It appears these ads were run locally in Whatcom County on October 18, 2019, and as you can see from the attached C6s these were not reported until October 23, 2019 – W

AY past the statutory deadline of 24hrs after publication.

**2) Failure to provide legally required details on Independent Expenditure Forms (Violation of RCW 42.17A.260(3)(C), WAC 390-16-037)**

This PAC has failed to provide legally required details about these independent expenditures which the law very clearly requires on these reports (See WAC 390-16-037 for specific examples). This is a well-known statute and rule for this corporately funded and very experienced PAC and the political-veterans and professionals hired to manage this PAC know very well. They chose to ignore the law regardless.

**3) Failure to provide legally required details on PAC expenditure reports, nor do these reports match the information provided to the PDC in the C6 reports (Violation of RCW 42.17A.235, .240 and WAC 390-16-037)**

Not only did this mega PAC fail to provide legally detailed information on their C6 reports as detailed above, they also failed to do so in the relevant expenditure reports (C4). I have attached this report for easy PDC staff reference, but as explained before, this PAC has refused to provide adequate details on this expenditure – who was it for? They also failed to provide the details about what it was (television ads, how many, when did they run? Etc). WAC 390-16-037 is very clear. The professional crew running this PAC knows the law. They just chose to ignore it.

Additionally, it should be noted that there might be a serious discrepancy in the funds reported on this C4 versus the C6s. \$20,000 appears to be missing. The two C6 reports indicate \$40,000 spent, but the C4 only reports \$20,000. For a PAC this size, they may not notice a missing \$20,000, but this is a substantial sum to find and resolve. This information has been concealed from the public during the critical 21 days of this election.

These violations are particularly concerning in light of the fact that the PDC has already issued a Formal Warning to this mega PAC, and despite that, they chose to break the law just a few months after receiving the Warning. It isn't clear if that Formal Warning was viewed as a Green Light to break the law, knowing there would be no consequences, or if this PAC just felt that they have enough money, the risk of a fine was so low it didn't even matter.

Either way, this merits an investigation by the PDC to get to the bottom of this one.

Best Regards,

Glen Morgan

42958 WA Conservation Voters Action Fund Written Warning.pdf  
317.41 KB

C4 - WA Con Voters - 100938149 - 10-15-2019 - Sway expenditure.pdf  
35.62 KB

C6 - WA Con Voters -9648 - 10-23-19 - late report.pdf  
172.95 KB

C6 - WA Con Voters -9646- 10-23-2019 - late report.pdf  
172.96 KB

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

Even large, well funded corporate PACs like this one should be required to follow the law just like the little guys. Even mega PACs like this one which hire professionals to do everything should be compliant with the law, and they can't be above it. The public has a

right to know the truth about how these large well-funded PAC spend their special interest and corporate dollars...

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

See attached and referenced in the complaint

**List of potential witnesses with contact information to reach them**

All officers, and probably the vendor referenced in the C6 and C4 reports

**Certification (Complainant)**

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: [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

January 28, 2019

Delivered electronically to "lennon@wcvoters.org"

Subject: Complaint filed by Bret Uhrich, PDC Case 42958

Dear WA Conservation Voters Action Fund:

Below is a copy of an electronic letter sent to Bret Uhrich concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Bret Uhrich, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet. Staff expects you to provide a mechanism in future political advertising for non-Internet capable devices to access the required sponsor identification disclosures quickly and easily. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Peter Lavalley  
Executive Director



**State of Washington  
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January 28, 2019

Delivered electronically to “buhrich@lawschool.gonzaga.edu”

Subject: Complaint regarding WA Conservation Voters Action Fund, PDC Case 42958

Dear Bret Uhrich:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 6, 2018. Your complaint alleged that WA Conservation Voters Action Fund may have violated RCW 42.17A.320 for failure to accurately and completely disclose sponsor identification on text message based political advertising.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by WA Conservation Voters Action Fund; and PDC guidance concerning sponsor identification for text messages issued October 13, 2018, to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- On November 6, 2018, the WA Conservation Voters Action Fund admits to sending a text message to the number associated with Yvonne Uhrich, soliciting votes in support of candidates Rollins and Wolfe for Snohomish County Public Utility District Commissioners.
- In accordance with WAC 390-18-030(3)(b), and the “one-click” exemption for small online advertising, WA Conservation Voters Action Fund provided a link that recipients with Internet capable phones could click and be taken to a page containing the required sponsor identification disclosures.
- WA Conservation Voters Action Fund cites to the PDC guidance, issued October 13, 2018, concerning text message sponsor identification, but omits the guidance concerning alternative methods for non-Internet capable phones.
- WA Conservation Voters Action Fund did not provide an alternative to receive sponsor identification information for devices not capable of following the link, as provided in the PDC’s guidance around sponsor identification in text messaging.

The guidance that WA Conservation Voters Action Fund cited in their response to the allegations states, “[s]ince some phones receiving the text will not be able to follow a link, we suggest campaigns include, in addition to a web address, mechanisms that allow the recipients to request sponsor ID information. Sponsors should make that process as easy as possible, perhaps by allowing the recipient to reply with a single character that then prompts another text message

*with the sponsor ID information. The message would look something like this: 'Go to www.xyzcommittee.com or text \*for sponsor information.'"]*

Based on these findings staff has determined that, in this instance, failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet does not amount to an actual violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), WA Conservation Voters Action Fund will receive a formal written warning concerning failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet. The formal written warning will include staff's expectation that WA Conservation Voters Action Fund provides a mechanism in future political advertising for non-Internet capable devices to access the required sponsor identification disclosures quickly and easily. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Peter Lavalley  
Executive Director

cc: WA Conservation Voters Action Fund

**SUMMARY, FULL REPORT  
 RECEIPTS AND  
 EXPENDITURES**

<b>C4</b> (3/97)	PDC OFFICE USE
	100938149
	10-15-2019

Candidate or Committee Name (Do not abbreviate. Include full name)  
**WASHINGTON CONSERVATION VOTERS ACTION FUND**

Mailing Address  
**PO BOX 1907**

City  
**SEATTLE, WA**

Zip + 4 <b>98111</b>	Office Sought (Candidates)	Election Date <b>2019</b>
Report Period Covered <b>09/01/19</b>	From (last C-4) <b>09/01/19</b>	To (end of period) <b>10/14/19</b>
		Final Report? Yes No <b>X</b>

**\*For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)

RECEIPTS		*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	\$			<b>\$104,903.79</b>
2. Cash received (From line 2, Schedule A) .....	\$	<b>\$131,096.54</b>		
3. In kind contributions received (From line 1, Schedule B).....		<b>\$0.00</b>		
4. Total cash and in kind contributions received this period (Line 2 plus 3).....				<b>\$131,096.54</b>
5. Loan principal repayments made (From line 2, Schedule L).....		<b>\$0.00</b>		
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)		<b>\$0.00</b>		
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)				<b>\$0.00</b>
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....				<b>\$236,000.33</b>
9. Total pledge payments due (From line 2, Schedule B) .....		<b>\$0.00</b>		

EXPENDITURES	
10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....	<b>\$29,694.24</b>
11. Total cash expenditures (From line 4, Schedule A) .....	<b>\$104,077.47</b>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....	<b>\$0.00</b>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....	<b>\$104,077.47</b>
14. Loan principal repayments made (From line 2, Schedule L).....	<b>\$0.00</b>
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	<b>\$0.00</b>
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)	<b>\$0.00</b>
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....	<b>\$133,771.71</b>

**CANDIDATES ONLY**

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:  
**(206) 374-0760**

**CASH SUMMARY**

18. Cash on hand (Line 8 minus line 17) .....	<b>\$102,228.62</b>
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed) .....	<b>\$0.00</b>
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	<b>\$102,228.62</b>

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		<b>SEAN PENDER</b>	<b>10/15/19</b>

# CASH RECEIPTS AND EXPENDITURE

**SCHEDULE**  
to C4 **A**  
(11/93)

2

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

Report Date

09/01/19      10/14/19

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
09/03/2019	\$1,000.00	09/16/2019	\$1,050.00	09/19/2019	\$16,500.00	
09/06/2019	\$2,500.00	09/18/2019	\$250.00	09/24/2019	\$100,000.00	
09/10/2019	\$250.00	09/11/2019	\$2,245.00	See attached		

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4      \$ \$131,096.54

**CODES FOR CLASSIFYING EXPENDITURES:** If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE  
DEFINITIONS  
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

### 3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$123.61
09/19/19	CITIZENS FOR LIBERTY AND LABOR PO Box 18845 Spokane, WA 99228		Contribution	\$10,000.00
10/09/19	RIVETERS COLLECTIVE PAC 1050 Larrabee Ave #104 PMB 462 Bellingham, WA 98225		Contribution	\$10,000.00
10/10/19	RIVETERS COLLECTIVE PAC 1050 Larrabee Ave #104 PMB 462 Bellingham, WA 98225		Contribution	\$2,000.00
10/09/19	SWAY 4350 EAST WEST HWY, STE 350 BETHESDA, MD 20814		Digital Buy	\$20,000.00
09/19/19	VOTE KRISTIN ANG 2411 S 19th St. Tacoma, WA 98405		Contribution	\$1,250.00
09/19/19	COMMITTEE TO ELECT KEITH PO Box 1068 Tacoma, WA 98402		Contribution	\$750.00

Total from attached pages      \$ \$59,953.86

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4      \$ \$104,077.47

# EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

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

Report Date

09/01/19

10/14/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
09/19/19	COMMITTEE TO ELECT MEGAN DUNN PO Box 2551 Everett, WA 98213		Contribution	\$750.00
09/19/19	PEOPLE TO ELECT BREEAN BEGGS PO Box 4452 Spokane, WA 99220		Contribution	\$1,000.00
09/19/19	PEOPLE TO ELECT BEN STUCKART PO Box 40041 Spokane, WA 99220		Contribution	\$1,000.00
09/19/19	APRIL BARKER FOR BELLINGHAM PO Box 504 Bellingham, WA 98227		Contribution	\$750.00
09/19/19	ELECT ANGELA BIRNEY 7345 164th Ave NE Ste 145 Redmond, WA 98052		Contribution	\$250.00
09/19/19	VOTE SATPAL SIDHU 154 E BARTLETT ROAD LYNDEN, WA 98264		Contribution	\$750.00
09/19/19	MCCLENDON FOR WHATCOM 4682 Wynn Road Bellingham, WA 98226		Contribution	\$750.00
09/08/19	SHELBY ISELER 3436 9TH AVE W SEATTLE, WA 98119		Food reimbursement	\$247.67
10/07/19	HOPKINS & SACHS INC PO BOX 765 SALEM, OR 97308		Consulting	\$54,456.19

**Attachment to Schedule A  
Additional Deposits**

for the period: 09/01/19 10/14/19

4

Name

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
09/18/19	\$1,000.00				
09/20/19	\$50.00				
10/01/19	\$250.00				
10/14/19	\$5,000.00				
09/20/19	\$1.54				
09/11/19	\$1,000.00				



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**

<b>1. Name and complete postal mailing address of sponsor:</b> WASHINGTON CONSERVATION VOTERS ACTION FUND PO BOX 1907 SEATTLE, WA 98111	E-mail <b>BRENDON@WCVOTERS . OR</b> Telephone <b>206-374-0760</b>
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**2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.**

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/16/19	10/18/19	SWAY 4350 EAST WEST HWY #350 BETHESDA, MD 20814	DIGITAL VIDEO	20,000.00

Expenditures \$100 or less not itemized above \$ 0.00

<b>Amount or Value</b> *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	\$ 20,000.00
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 40,000.00

**3. List of candidate(s) or ballot proposition(s) identified in the advertising.**

Candidate/Proposition	Office/District/ Proposition No.	Party	Check 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
MCCLENDON, NATALIE	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	<input checked="" type="checkbox"/> <input type="checkbox"/>	\$ 20,000.00	\$ 0.00
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$

**Filer Name:**

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

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

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

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

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

<b>Sponsor of Independent Expenditure or Electioneering Communication</b>	
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 <b>SEAN PENDER</b>
	Street address <b>PO BOX 1907</b>
	City/State/Zip <b>SEATTLE WA 98111</b>
	Date Signed <b>10/23/19</b> Place Signed (city and county) <b>SEATTLE KING</b>
	*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."



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**

<b>1. Name and complete postal mailing address of sponsor:</b>  WASHINGTON CONSERVATION VOTERS ACTION FUND PO BOX 1907 SEATTLE, WA 98111	E-mail
	BRENDON@WCVOTERS . OR
	Telephone
	206-374-0760

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

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/16/19	10/18/19	SWAY 4350 EAST WEST HWY #350 BETHESDA, MD 20814	DIGITAL VIDEO	20,000.00

Expenditures \$100 or less not itemized above \$ 0.00

<b>Amount or Value</b> *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	\$ 20,000.00
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 20,000.00

3. List of candidate(s) or ballot proposition(s) identified in the advertising.					Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose			
MCCLENDON, NATALIE	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 20,000.00	\$ 0.00
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$

**Filer Name:**

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

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

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

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

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

<b>Sponsor of Independent Expenditure or Electioneering Communication</b>	
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 <b>SEAN PENDER</b>
	Street address <b>PO BOX 1907</b>
	City/State/Zip <b>SEATTLE WA 98111</b>
	Date Signed <b>10/23/19</b> Place Signed (city and county) <b>SEATTLE KING</b>
	*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."