

Shannon Murphy replied Wed, 11 Dec 2019 at 5:33PM
to: "PDC Support" <pdcc@pdc.wa.gov> +1
cc: sean@wcvoters.org

Dear Ms. Blacksmith,

Thank you for the opportunity to explain the apparent discrepancies on WCVAF's Form C-6. Two of the issues you raised involved inadvertent errors; we will amend the report accordingly. For the other issue, we understand why your question arose, but we believe we followed state law and PDC rules in filling out the form.

Expenditures to Hopkins & Sachs, Inc.:

- a. Direct mail expenditure of \$15,156.19 – When we initially filed the Form C-4, we inadvertently omitted this expenditure from the C-4. When this accidental omission was brought to our attention, we filed an amended Form C-4. It escaped our attention to add it to the Form C-6. We have amended the Form C-6 to disclose it now.
- b. Digital & print production expenditure of \$39,300 – This expenditure covered a broad variety of mail, videos website and other digital communications. All of the communications were paid for by WCVAF, but only a small fraction mentioned candidates – the rest simply encouraged Washingtonians to vote on November 5th. Because those communications did not advocate for or against any candidates, they were not reported on Form C-6. The only communication that advocated for candidates was a website, which accounted for \$6,000 of the \$39,300 expenditure. The pro rata, attributable costs of the website did not reach the statutory threshold, so WCVAF did not include those costs on the Form C-6.

Date Paid versus Date Made: WCVAF erroneously marked the incorrect dates on the Form C-6 for the digital ads supporting Natalie McClendon for Whatcom County Council. The expenditure was made on October 9, 2019, and first presented to the public on October 16, 2019. We are filing an amended Form C-6, reflecting October 19 as the "Date Made" and October 16 as the "Date First Presented."

Attached, please find copies of the amended reports that we filed today. Please call or email me if you have any follow-up questions.

Thank you,
Shannon

Shannon Murphy • President
206.631.2628 • cell 206.910.8776 • shannon@wcvoters.org

Washington Conservation Voters • wcvoters.org
1402 Third Avenue | Suite 1400 | Seattle, WA 98101



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: WASHINGTON CONSERVATION VOTERS ACTION FUND PO BOX 1907 SEATTLE, WA 98111	E-mail BRINDON@WCVOTERS.ORG Telephone 206-374-0760
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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)
10/19/19	10/16/19	SWAY 4350 EAST WEST HWY #350 BETHESDA, MD 20814	DIGITAL AD PLACEMENT SVCS	20,000.00

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

Amount or Value <small>*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.</small>	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) ☒ 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	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	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 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

Street address

City/State/Zip

Date Signed

Place Signed (city and county)

*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

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☒ **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: WASHINGTON CONSERVATION VOTERS ACTION FUND PO BOX 1907 SEATTLE, WA 98111	E-mail BRINDON@WCVOTERS.ORG Telephone 206-374-0760
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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)
10/07/19	10/16/19	HOPKINS & SACHS 600 N 36TH ST SEATTLE, WA 98103	DIRECT MAIL-26,236 PCS-ANG	15,156.19

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

Amount or Value	Total this report
*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.	\$ 15,156.19
Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 82,365.37

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		
ANG, KRISTIN	PORT COMMISSIONER/PORT OF TACOMA	NON PARTISAN	<input checked="" type="checkbox"/> <input type="checkbox"/>	\$ 15,156.19	\$ 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) ☒ 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	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	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 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 SEAN PENDER
	Street address PO BOX 1907	
	City/State/Zip SEATTLE WA 98111	
	Date Signed 12/11/19	Place Signed (city and county) SEATTLE KING
	*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."	