#### **Respondent Names**

509 Forward

#### **Complainant Name**

Benjamin K Willard

#### **Complaint Description**

**Benjamin K Willard** reported via the portal (*Tue*, 26 Oct 2021 at 4:21 PM)

In the attached electioneering political advertisement, the Top 5 contributors fail to list Lisa Brown for Congress.

According to the 509 Forward's PDC cash receipts C3 form, Lisa Brown for Congress made a contribution to the committee on 10/8/2021 in the amount of \$9,500.

On 509 Forward's independent expenditure ads C6 form, it lists an expense for a mailer supporting Naghmana Sherazi for Spokane City Council an Opposing Jonathan Bingle for Spokane City Council dated 10/14/2021.

In addition to failing to disclose Lisa Brown for Congress in the Top 5 contributors disclaimer, as a PAC entity, the sponsors should have also disclosed the Top 3 donors to Lisa Brown for Congress.

According to the PDC website's Political Advertising Guide:

A political committee must include its Top 5 contributors' names when sponsoring an ad about a ballot measure with a cost of at least \$1,000 in the aggregate, or when making an independent expenditure for or against a candidate. If the Top 5 includes any political committees, the sponsor must also list the Top 3 donors to the political committees.\* The Top 3 donors to PAC contributors must be three individuals or entities other than political committees.

The sponsor determines the Top 5 and Top 3 lists by considering the largest contributors who gave at least \$1,000\* during the 12 months before the ad appears. In the case of a tie among the top contributors, meaning multiple contributors have given the same amount, the political committee sponsor may choose which will be named. \*Effective July 28, 2019

Screen Shot 2021-10-26 at 4.20.13 PM.png 3.28 MB

Screen Shot 2021-10-26 at 4.19.19 PM.png 291.69 KB

Screen Shot 2021-10-26 at 4.18.59 PM.png 237.98 KB Screen Shot 2021-10-26 at 4.18.26 PM.png 239.83 KB

Screen Shot 2021-10-26 at 4.18.03 PM.png 234.11 KB

Screen Shot 2021-10-26 at 4.17.55 PM.png 244.63 KB

Screen Shot 2021-10-26 at 4.17.37 PM.png 168.04 KB

Screen Shot 2021-10-26 at 4.17.20 PM.png 233.82 KB

Screen Shot 2021-10-26 at 4.17.03 PM.png 290.61 KB

Screen Shot 2021-10-26 at 4.16.44 PM.png 278.26 KB

Screen Shot 2021-10-26 at 4.16.17 PM.png 487 45 KB

Screen Shot 2021-10-26 at 4.15.59 PM.png 381 KB

Screen Shot 2021-10-26 at 4.15.24 PM.png 1.09 MB

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

Without disclosure and transparency, Spokane voters have little idea who is trying to influence their vote, making it difficult to make an informed choice for City Council. This specific situation has the appearance of dark money coming into Spokane politics. In this case, it appears perpetrated by political operatives – including an appointed state official who should have a clear understanding of the laws and know better than to take part in these actions. To say nothing of the fact that her husband, top advisor to the very Council President that endorsed Naghmana Sherazi, would benefit from the outcome of this election. If true, that would be a significant breach of the public trust.

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

Form~C6-509~Forward-accessed~10/15/2021

Form C3 – 509 Forward – accessed 10/11/2021

FEC Statement of Candidacy Form – Lisa Brown for Congress – Filed 05/23/2019

509 Forward Contributors List (screenshot, PDC.WA.GOV)

Attached Mailer

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

Josie Olsen Blue Wave Politics 401 2nd Ave S Ste 303 Seattle, WA 98104 206-682-7328

Lisa J. Brown

Director of Washington State Department of Commerce lisabrown.wa@gmail.com

Lisa Brown for Congress Treasurer Jay Peterson Partner/Compliance Blue Wave Political Partners 401 2nd Ave S Ste 303 Seattle, WA 98104 jay@bluewavepolitics.com

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.

## 509 Forward, 2021

All contributions made to this campaign or committee by contributor name.





**C6** 

10/15/2021

10942

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 E-mail 1. Name and complete postal mailing address of sponsor: 509 FORWARD JOSIE@BLUEWAVEPOLIT PO BOX 853 Telephone SPOKANE, WA 99210 2066827328 2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication. **Date First** Presented/ Name and Address of Description of Expenditure **Amount or Value Date Made** Mailed Vendor or Recipient (e.g., direct mail or newspaper, TV or radio ad) (\*See Below) 10/14/21 10/12/21 PAPERMILL PRINTING POSTCARDS (3672) 3,727.57 14 W INDIANA SPOKANE, WA 99205 GRAPHIC DESIGN - RETAINER 08/19/21 10/14/21 TREATMENT LLC 1,000.00 304 W PACIFIC AVE 99201 SPOKANE, WA Expenditures \$100 or less not itemized above \$ 0.00 \$ Total this report 4,727.57 Total independent expenditures and Amount or Value electioneering communications made \*If no reasonable estimate can be made of value, describe activity, services, during this election campaign. Include property or right furnished precisely and attach copy of item produced or amounts shown in this report and distributed. previously submitted C-6 reports. \$ 4,727.57 3. List of candidate(s) or ballot proposition(s) identified in the advertising. Show total C-6 expenses Show portion of current expense attributable to related to each candidate/ Office/District/ each candidate or proposition during election Check proposition campaign Candidate/Proposition Proposition No. Support or Oppose Party BINGLE, JONATHAN CITY COUNCIL NON \$ x \$ 2,363.79 2,363.79 MEMBER/CITY OF PARTISAN SPOKANE SHERAZI, NAGHMANA CITY COUNCIL П \$ NON x \$ 2,363.78 2,363.78 MEMBER/CITY OF PARTISAN SPOKANE \$ \$ \$

Continued on attached sheet □

#### 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	9
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet □	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

# 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.

Sponsor of Independent Expenditure or Electioneering Communication

penalty of the State of the

10/15/21 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."

Only

PAGE 1/8 -

STATEMENT OF **FEC ORGANIZATION** FORM 1 Office Use Only Example: If typing, type NAME OF (Check if name 12FE4M5 COMMITTEE (in full) is changed) over the lines. Lisa Brown for Congress PO Box 154 ADDRESS (number and street) (Check if address is changed) Spokane 99210 WA CITY A STATE A ZIP CODE A COMMITTEE'S E-MAIL ADDRESS compliance@bluewavepolitics.com (Check if address is changed) Optional Second E-Mail Address COMMITTEE'S WEB PAGE ADDRESS (URL) lisabrownforcongress.com (Check if address is changed) 08 31 2017 DATE C00654400 FEC IDENTIFICATION NUMBER x IS THIS STATEMENT NEW (N) OR AMENDED (A) I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete. Petterson, Jay, , , Type or Print Name of Treasurer Petterson, Jay, , , [Electronically Filed] Date 05 23 2019 Signature of Treasurer NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS. Office For further information contact: **FEC FORM 1** Federal Election Commission Use (Revised 06/2012)

Toll Free 800-424-9530

Local 202-694-1100

FEC F	orm 1 (Revised 02/2009)	Page 2
	COMMITTEE	
Candidat	e Committee:	
(a) <b>x</b>	This committee is a principal campaign committee. (Complete the candidate information below.	
(b)	This committee is an authorized committee, and is NOT a principal campaign committee. (Cominformation below.)	plete the candidate
Name of Candidate	Brown, Lisa, , ,	
Candidate Party Affiliat	ion DEM Office Sought: House Senate President	State WA District 05
(c)	This committee supports/opposes only one candidate, and is NOT an authorized committee.	
Name of Candidate		
Party Cor		
(d)	This committee is a (National, State or subordinate) committee of the	(Democratic, Republican, etc.) Party
Political A	Action Committee (PAC):	
(e)	This committee is a separate segregated fund. (Identify connected organization on line 6.) Its con	nnected organization is
	Corporation Corporation w/o Capital Stock	Labor Organization
	Membership Organization Trade Association	Cooperative
	In addition, this committee is a Lobbyist/Registrant PAC.	
(f)	This committee supports/opposes more than one Federal candidate, and is NOT a separate so committee. (i.e., nonconnected committee)	egregated fund or party
	In addition, this committee is a Lobbyist/Registrant PAC.	
	In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)	
Joint Fun	draising Representative:	
(g)	This committee collects contributions, pays fundraising expenses and disburses net proceeds for to committees/organizations, at least one of which is an authorized committee of a federal candidate.	wo or more political
(h)	This committee collects contributions, pays fundraising expenses and disburses net proceeds for two committees/organizations, none of which is an authorized committee of a federal candidate.	vo or more political
Con	nmittees Participating in Joint Fundraiser	
1.	FEC ID number	
2.	FEC ID number	
3.	FEC ID number	
4.		*

_			-
FEC Form 1 (Revised 0	2/2009)		Page <b>3</b>
Write or Type Committee Name			
Lisa Brown for C	Congress		
72	rganization, Affiliated Committee, Joint	Fundraising Representative, or Leade	rship PAC Sponsor
Brown Victory Fund			
			1111111
Mailing Address	119 1st Ave S		
	Ste 320		
	Seattle	WA 98104	1-1-1-1
	CITY	STATE	ZIP CODE
Relationship: Connected	Organization Affiliated Committee	Joint Fundraising Representative	eadership PAC Sponsor
<ol> <li>Custodian of Records: Ident books and records.</li> <li>Petterson, v.</li> </ol>	ify by name, address (phone number	optional) and position of the person in p	ossession of committee
Full Name			لتبتبت
Mailing Address	119 1st Ave S		
	Suite 320		
	Seattle	WA 98104	
Title or Position	CITY	STATE	ZIP CODE
Treasurer		Telephone number 206 - L	682 7328
Treasurer: List the name and any designated agent (e.g., as	address (phone number optional) of t ssistant treasurer).	he treasurer of the committee; and the r	name and address of
Full Name Petterson, 3	ay, , ,		
Mailing Address	119 1st Ave S		
ag , taa. eee	Suite 320		
	Seattle	WA     98104	
	CITY	STATE	ZIP CODE
Title or Position Treasurer	Ĭ	, 206 , ,	682   7328

206

Telephone number

682

7328

	n 1 (Revised 02/2009)	Page 4
¥-		
Full Name of Designated Agent		
Mailing Address		
7 3 3: 0:2		
	CITY STATE	ZIP CODE
Title or Position		or to
	Telephone number	
Name of Bank, [	oxes or maintains funds. Depository, etc.  Washington Trust Bank	
	717 W Sprague Ave	
Mailing Address	111 W Sprague Ave	
Mailing Address	Line	
Mailing Address	Spokane	99201
Mailing Address		99201
Mailing Address  Name of Bank, [	Spokane WA CITY STATE	
	Spokane WA CITY STATE	
	Spokane WA  CITY STATE  Depository, etc.	
Name of Bank, [	Spokane  CITY  STATE  Depository, etc.  Bank of America	
Name of Bank, [	Spokane  CITY  STATE  Depository, etc.  Bank of America	

### Optional Supplemental Information for Lines 5(g) or (h), 6, 8 and/or 9

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Page	5	of <sup>8</sup>	

5(g)	or(h). <b>Joint Fundraisin</b>	g Participant:		
	1.		FEC ID number	C
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	3.		FEC ID number	C
	4.		FEC ID number	C
	4.		,	
6.	Name of Any Connected	Organization, Affiliated Committee, Joint Fundra	ising Representative	, or Leadership PAC Sponsor
	Friends of Lisa an	d Sean		
				1
	Mailing Address	119 1st Ave S		<u> </u>
		Ste 320		
		Seattle	WA	98104
	Relationship:	CITY A	STATE ▲	ZIP CODE ▲
	Connected	d Organization Affiliated Committee	Fundraising Representa	tive Leadership PAC Sponsor
	P.			
8.	Designated Agent: Identify	by name, address (phone number - optional)		
	Designated Agent. Identify	by mame, address (prioris mamber optional)		
	Full Name			
	Full Name			
	Full Name			
	Full Name	CITY	STATE A	ZIP CODE A
	Full Name	CITY A	STATE A	ZIP CODE A
	Full Name	CITY A	1	ZIP CODE A
9.	Full Name  Mailing Address  TITLE OR POSITION	CITY A  Tel  ries: List all banks or other depositories in which to	ephone Number	
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## Optional Supplemental Information for Lines 5(g) or (h), 6, 8 and/or 9

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Page	6	of <sup>8</sup>	

(g) or (h). <b>Joint Fundrais</b>	ing Participant:		
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2.		FEC ID number	C
3.		FEC ID number	C
4.		FEC ID number	C
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Mailing Address	8391 BEVERLY BLVD	111111	
	<u> Transparanta</u>		
	LOS ANGELES	CA	90048
Relationship:	CITY A	STATE ▲	ZIP CODE ▲
Connect	ted Organization Affiliated Committee	t Fundraising Representa	tive Leadership PAC Sponsor
B. Designated Agent: Ident	ify by name, address (phone number – optional)		
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	Tremanner in the		
	<u> Leggione de la companya dela companya dela companya de la companya de la companya de la companya dela companya de la company</u>		
TITLE OR POSITIO	N ▼ CITY ▲	STATE ▲	ZIP CODE ▲
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## Optional Supplemental Information for Lines 5(g) or (h), 6, 8 and/or 9

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Page	E ( )	of °	

5(g)	or(h). <b>Joint Fundraisi</b> n	g Participant:		
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	3.	În ellisteline	FEC ID number	C
	4.		FEC ID number	C
6.	Name of Any Connected FLIP WA BLUE 2	Organization, Affiliated Committee, Joint Fundra	ising Representative	e, or Leadership PAC Sponsor
	LII WA BEGE 2			
	Mailing Address	119 1ST AVENUE SOUTH		
		SUITE 320		
		SEATTLE	WA	98104
	Relationship:	CITY A	STATE ▲	ZIP CODE ▲
	Connected	d Organization Affiliated Committee	Fundraising Represent	ative Leadership PAC Sponsor
8.	Designated Agent: Identify Full Name	y by name, address (phone number - optional)		
	<del>- /- /- /</del> -			1
	Mailing Address			
	TITLE OR POSITION	▼ CITY ▲	STATE ▲	ZIP CODE ▲
			ephone Number	
9.	Banks or Other Deposito safety deposit boxes or ma	ries: List all banks or other depositories in which thaintains funds.	he committee deposit	s funds, holds accounts, rents
	Name of Bank, Depository, etc.			
	Mailing Address			
		CITY A	STATE A	ZIP CODE ▲

Optional Supplemental Information for Lines 5(g) or (h), 6, 8 and/or 9

Page \_\_\_\_ **of** \_8\_\_\_

r(h). <b>Joint Fundraisi</b> n	ng Participant:		
1.		FEC ID number	C
2.		FEC ID number	C
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Name of Any Connected RED TO BLUE V	Organization, Affiliated Committee, Joint Fundra	aising Representative	e, or Leadership PAC Sponso
KED TO BLOE VI	CONTROND		
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terbal design - Personal and Turk	2ND FLOOR		
	WASHINGTON	DC	20002
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Pesignated Agent: Identify Full Name Mailing Address  TITLE OR POSITION Banks or Other Deposito safety deposit boxes or ma	Affiliated Committee  y by name, address (phone number – optional)  CITY   Teleprises: List all banks or other depositories in which the	Fundraising Representation	ZIP CODE A
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## CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

THIS SPACE FOR OFFICE USE

110053318

10-11-2021

	95.077. 15.		RAMERICO - TOTAL PORTENIA CASA - ASTA	(1/02)		11 2021
Candidate 509 For	or Committee Name (Do not abbreviate. Use full nar	me.)				
Mailing Ad						
PO Box	853					
City	Zip + 4		Office Sought (candidate	tes)	Election Da	te
Spokane	e, WA 99210 ARY CONTRIBUTIONS DEPOSITED IN ACCOUNT				2021	
1. MONE I	ARY CONTRIBUTIONS DEPOSITED IN ACCOUNT					
Date Received					Amount	Total
\$ <del>7.</del>	a. Anonymous					
	b. Candidate's personal funds deposited in the b	ank (include	candidate loans in 1c)			
92	c. Loans, notes, security agreements. Attach So	chedule L				
c <del>.</del>	d. Miscellaneous receipts (interest, refunds, auc	tions, other).	Attach explanation			
75 	e. Small contributions \$25.00 or less not itemize	d and numbe	r of persons giving (pers	sons)	-2	
Date	BUTIONS OVER \$25.00			P G R E	Amount	Aggregate*
Received	Contributor's Name, Address, City, State, Zip	Employ	er's Name, City and State	I N	T	Total
10/08/21	LISA BROWN FOR CONGRESS 401 2nd Ave S Ste 303 Seattle, WA 98104		L		\$9,500.00	\$9,500.00
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<u> </u>					77.5	
			-	320		
¥		Occupation	1		223	
	☐ Check here if additional			o-total	\$9,500.00	
200	pages are attached		Amoun attached	3 10 19 10 10 10 10 10 10 10 10 10 10 10 10 10	\$0.00	*See reverse
	FUNDS RECEIVED AND DEPOSITED OR CREDITE arts 1 and 2 above. Enter this amount in line 1, Sche				\$9,500.00	for details.
4. Date of			I certify that this report is true	and comp	lete to the best of m	y knowledge
10/	08/21		Treasurer's Signature			Date
Treasurer's	s Daytime Telephone No.: (206) 682-7328		Josie Olsen		1	10-11-2021

We deserve an advocate like Naghmana Sherazi to stand up for working families and make sure that NE Spokane gets its fair share of resources.



Vote Naghmana Sherazi by November 2nd.



No candidate authorized this ad. It is paid for by 509 Forward PAC (PO Box 853, Spokane, WA 99210). Top five contributors: Susan Sawyer, Jerry LeClaire, Kelsey Gray, Fred Schrumpf, Golieda Jansen



PRESORTED STANDARD U.S. POSTAGE PAID PERMIT #1221 Spokane, WA