



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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March 22, 2021

Sent Electronically to Emily Randall and Abbot Taylor, Treasurer

Subject: Audit Report – Emily Randall 2018 Senate Campaign

Dear Senator Randall and Mr. Taylor:

This letter is to inform you that PDC staff has completed the limited-scope audit of the 2018 Emily Randall for Senate Campaign (Campaign). Staff's audit found that your Campaign:

- Substantially complied with the candidate reporting requirements found in RCW 42.17A and WAC 390, concerning the timely and accurate filing of the Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) reviewed as part of this audit.
- The documentation provided for selected expenditures as part of the Campaign books of account verified the expenditure information disclosed on the Schedule A to C-4 reports.
- Practices concerning contribution and expenditure activities and internal control procedures were sound and properly facilitated the timely and accurate disclosure of activities undertaken by the Campaign during the 2018 election cycle.

Thank you both for fully cooperating with the PDC staff during this audit. If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [erick.agina@pdc.wa.gov](mailto:erick.agina@pdc.wa.gov).

Sincerely,

Endorsed by:

s/ \_\_\_\_\_

Electronically Signed Erick Agina  
PDC Compliance Officer

s/ \_\_\_\_\_

Electronically Signed Peter Lavallee  
PDC Executive Director



**Public Disclosure Commission**  
Shining Light on Washington Politics Since 1972



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BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH  
RCW 42.17A

2018 Emily Randall for Senate  
Campaign

PDC Audit No. 20-05

Audit Report

**I.**

**Scope**

- The Public Disclosure Commission (PDC) has the authority under RCW 42.17A.105 and .110 to conduct audits of candidates, committees and other filing entities.
- Initiative 134, a statewide initiative concerning campaign finance and contribution limits was overwhelmingly approved by voters in 1992 and included the requirement for the PDC to conduct audits of filers. The audits are meant to provide the public with information about candidates, political committees and other filers, and to determine those filers' degree of compliance with the reporting requirements and provisions of RCW 42.17A.
- The audit findings provide PDC staff with an opportunity to identify problem areas in reporting campaign or committee contribution and expenditure activities that may suggest a need to revise advice and guidance given to filers, to recommend or initiate changes in the law, to adopt or revise the rules for reporting, and if necessary, enforcement. The Commission believes that the primary purposes of conducting audits are to:
  1. Verify that the information disclosed on the candidates and political committee campaign finance reports is timely and accurate in accordance with RCW 42.17A.
  2. Determine whether candidates and political committee are in substantial compliance with the laws, rules and reporting requirements.
  3. Evaluate record keeping and reporting procedures used by filers and suggest corrective action to ensure future compliance with the law, or law/rule changes as necessary depending on the audit findings.

- PDC staff selected four State Senate races from the 2018 election cycle, involving eight Legislative candidates for limited-scope audits to be conducted based on the audit criteria established by staff. The audit criteria included both 2018 Senate candidates in each Legislative District to have been in a contested 2018 general election, with both candidates disclosing significant contribution and expenditure activities, and the election had a lot of public interest.
- Once the eight audits have been completed, PDC staff will be selecting eight Legislative candidates for State Representative from the 2020 election cycle to conduct limited-scope audits based on the same audit criteria listed above.

## II.

### Respondent Background

- Emily Randall is an incumbent Washington State Senator representing the 26<sup>th</sup> Legislative District.
- On April 3, 2018, Emily Randall filed a Candidate Registration (C-1 report) declaring her candidacy for election to the office of State Senator in the 26<sup>th</sup> Legislative District in 2018, selecting the Full Reporting Option and listing her sole Campaign Officer as Abbot Taylor, Ministerial Treasurer.
- On February 10, 2021, PDC staff sent an email to the Emily Randall for Senate Campaign, and attached a letter notifying her that staff was conducting audits of four 2018 contested Senate races as previously discussed with Mr. Taylor, Treasurer for the 2018 Campaign, during a brief telephone conversation/email communication. The letter stated staff was conducting a limited-scope audit of the two 2018 candidates that ran for State Senator in the 26<sup>th</sup> Legislative District, which included Senator Randall. The letter requested documentation maintained by the Campaign for selected expenditures made during the 2018 election cycle, in addition to a brief narrative regarding general contribution and expenditure campaign practices, including the record keeping of the campaign books of account in order to complete the audit work.
- As noted above, the audits provide the PDC and the public with an opportunity to determine the degree of compliance with the PDC reporting requirements, thereby enhancing and strengthening the public's confidence in the campaign finance information being disclosed by filers. The audits also assist in identifying areas in the reporting of campaign contribution and expenditure activities that may suggest a need to update or revise the advice on the PDC website in the PDC online candidate manuals, and from Filer Assistance staff, and areas of potential changes in the law or amendments made to the PDC rules to further clarify a specific reporting requirement.
- The limited-scope audits consist primarily of reviewing the Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by each Campaign, and queries conducted by PDC staff of the contribution and expenditure databases on the PDC website. The information is reviewed to determine the Campaigns timeliness and accuracy in disclosing contribution and expenditure activities undertaken on the C-3 and C-4 reports in accordance with the reporting requirements found in RCW 42.1A.235 and .240.

### **III. Findings**

- The 2018 Emily Randall for Senate Campaign (Campaign) disclosed receiving \$661,031 in total contributions and \$650,823 in total expenditures made during the 2018 election cycle, with \$10,209 as a cash on hand balance through December 31, 2018 on the “Final C-4 report” timely filed on January 10, 2019.

#### **Timeliness and Accuracy in the filing of C-3 reports disclosing contributor information:**

- Candidates appearing on the 2018 primary and general election ballots who selected the Full Reporting option were required to file weekly C-3 reports every Monday beginning June 1, 2018 through the date of the general election, disclosing contributions that were received and deposited the previous seven days. Prior to June 1, 2018, candidates were required to file monthly C-3 reports for deposits of campaign contributions made during the month or period covered by the C-4 report.
- RCW 42.17A.220 requires candidates to timely deposit monetary contributions received into the campaign bank account or depository within five business days of receipt.
- For the 2018 election cycle, the Campaign filed C-3 reports disclosing contributions received covering the period December 26, 2017 through December 31, 2018, that included 2,766 separate monetary and in-kind contributions totaling \$661,031.46. The \$661,031.46 in total monetary and in-kind contributions received included anonymous and small non-itemized contributions as disclosed on C-3 reports.
- The Campaigns four largest contributors in 2018 included the following political party committees and caucus political committees:
  1. Washington State Democratic Central Committee (WSDCC): A total of \$95,056 was received from the WSDCC for in-kind contributions received during the 2018 election cycle.
  2. Washington Senate Democratic Campaign (WSDCC): A total of \$91,298.96 was received from the WSDCC for \$28,298.96 in-kind contributions received during the 2018 election cycle for the research and polling, and one \$63,000 monetary contribution received on September 28, 2018.
  3. House Democratic Caucus Committee (HDCC): A total of \$53,600 in monetary and in-kind contributions were received from the HDCC, that included a \$50,000 monetary contribution received on September 30, 2018.
  4. 26<sup>th</sup> Legislative District Democrats (26<sup>th</sup> LDD): A \$15,000 monetary contribution was received from the 26<sup>th</sup> LDD during the 2018 election.
- Based on the number of C-3 reports filed by the Campaign, staff reviewed 31 C-3 report filed for contributions received and deposited beginning June 1, 2018, when the C-3 report accelerated reporting requirements began for 2018 candidates. Under that reporting requirement, C-3 reports are required to be filed every Monday for contributions received and

deposited the preceding seven calendar days. The 2018 C-3 reports filed by the Campaign and reviewed by staff included the following:

<b>Date Received</b>	<b>Date Deposited</b>	<b># of contributors and description</b>	<b>Total C-3 Amount</b>	<b>C-3 Filing Date</b>	<b>Days Late</b>
6/4 – 6/10/18	6/11/2018	Two-page C-3 report depicting seven contributions received from individuals ranging from \$26 to \$1,000 and one small donation of \$25 or less totaling \$10.	\$1,298.00	6/18/2018	0
6/15-6/18/18	6/21/2018	Two-page C-3 report depicting nine individuals ranging from \$37 to 250; five contributions from PACs (PacNW Regional Council, WA State Building, Washington School Principals, SEIU Local 925 Public Service and UFCW 21 PAC) for a total of \$3,700; and one small contribution of \$25 or less totaling \$10.	\$4,595.00	6/25/2018	0
6/18-6/24/18	6/25/2018	Two-page C-3 report depicting 13 contributions received from individuals ranging from \$20 to \$500 and two small contributions \$25 or less totaling \$30.	\$1,552.00	7/2/2018	0
6/24-6/28/18	6/29/2018	Two-page C-3 report depicting two contributions received from individuals totaling \$1,500; seven contributions from PACs (RPEC-PAC, Citizens for Better Government, WA State Nurses Association PAC, Bremerton Fire Fighters IAFF, SEIU 775 Quality Care Committee, WA Education Association PAC and SEIU Healthcare PAC) totaling \$6,000; and one contribution from a political candidate committee (People for Derek Kilmer) totaling \$1,000.	\$8,500.00	7/2/2018	0
6/30 – 7/5/18	7/6/2018	Three-page C-3 report depicting 10 contributions received from individuals ranging from \$30 to \$1,000 and six contributions from PACs (Kitsap County Central Labor, Washington Values PAC, WA Federation of State, ILWU 23 PAC, and Public School Employees of WA) totaling \$5,150.	\$7,480.00	7/9/2018	0
7/3-7/9/2018	7/9/2018	Four total contributions from three individuals ranging from \$100 to \$250 and one contribution from Washington Senate Democratic for \$40,000.	\$40,550.00	7/9/2018	0
7/9 – 7/14/18	7/16/2018	Five-page C-3 report depicting 45 contributions received from individuals ranging from \$10 to \$1,000 and eight small contributions \$25 or less not itemized totaling \$135.	\$4,490.00	7/17/2018	0

<b>Date Received</b>	<b>Date Deposited</b>	<b># of contributors and description</b>	<b>Total C-3 Amount</b>	<b>C-3 Filing Date</b>	<b>Days Late</b>
7/23-7/29/18	7/31/2018	Five-page C-3 report depicting 40 contributions received from individuals ranging from \$10 to \$500 and one small contributions \$25 or less not itemized totaling \$25.	\$3,572.00	7/30/2018	0
7/30/2018	8/1/2018	Two-page C-3 report depicting three contributions received from individuals and three contributions received from PACs (IUOE Local 302 SPF (\$500), MoveOn.org (\$1,000) and Planned Parenthood Votes (\$500)) totaling \$2,000.	\$2,348.00	8/1/2018	0
7/30 – 8/5/18	8/6/2018	Six-page C-3 report depicting 58 contributions received from individuals ranging from \$10 to \$1000 and six small contributions of \$25 or less not itemized for total of \$63.	\$8,786.33	8/6/2018	0
8/13-8/19/18	8/20/2018	Four-page C-3 report depicting nine contributions from individuals ranging from \$25.42 to \$500 and 31 small contributions \$25.42 to \$500 and 31 small contributions of \$25 or less not itemized totaling \$292.76.	\$1,573.18	8/20/2018	0
8/15-8/21/18	8/20/2018	Four-page C-3 report depicting 37 contributions received from individuals ranging from \$10 to \$1000 and five small contributions of \$25 or less totaling \$65.	\$4,247.00	8/27/2018	0
8/20-8/25/18	8/27/2018	Two-page C-3 report depicting 15 contributions received from individuals ranging from \$15 to \$1,000 and five small contributions of \$25 or less totaling \$95.	\$3,114.00	9/4/2018	0
8/27-8/30/18	8/31/2018	Two-page C-3 report depicting 14 contributions received from individuals ranging from \$15 to \$500 and small contributions of \$25 or less totaling \$45.	\$1,170.00	9/4/2018	0
8/31-9/6/18	9/4/2018	Two-page C-3 report depicting seven contributions received from individuals ranging from \$50 to \$500 and five PACs (WA State Nurses Association (\$1,000), WA State School Retirees PAC (\$1,000), ATU COPE Voluntary Account (\$500), Nisqually Indian Tribe (\$1,000), and NW Credit Union Assn (\$1,000)) totaling \$4,500.	\$5,600.00	9/10/2018	0
9/4-9/9/18	9/10/2018	Four-page C-3 report depicting 37 contributions from individuals ranging from \$26 to \$500 and five small contributions of \$25 or less totaling \$80.	\$3,991.00	9/17/2018	0

<b>Date Received</b>	<b>Date Deposited</b>	<b># of contributors and description</b>	<b>Total C-3 Amount</b>	<b>C-3 Filing Date</b>	<b>Days Late</b>
9/14-9/16/18	9/17/2018	Five-page C-3 report depicting 39 contributions from individuals ranging from \$26 to \$1,000 and two small contributions of \$25 or less totaling \$30.	\$7,234.00	9/24/2018	0
9/17-9/23/18	9/24/2018	Seven-page C-3 report depicting 67 contributions from individuals ranging from \$10 to \$1,000 and eight small contributions \$25 or less totaling \$85.	\$8,344.00	10/1/2018	0
9/26-9/28/18	9/28/2018	Three-page C-3 report depicting 10 contributions from individuals ranging from \$50 to \$250; one contribution from a candidate's campaign committee; 10 contributions from PACs (26 <sup>th</sup> District Democrats (\$1,000), Campaign for Tribal (\$1,000), Iron Workers District Council (\$1,000), IUPAT Political Action Together (\$1,000), Justice for All (\$1,000), NARAL Pro-Choice Washington (\$500), WA Housing Alliance Action Fund (\$500), WA Machinist Council MNPL Fund (\$1,000), WA School Principals (\$1,000), WA St Council of County (\$1,000), WA Senate Democratic Campaign (\$63,000))	\$74,025.00	10/1/2018	0
9/24-9/30/18	10/1/2018	Eleven-page C-3 report depicting 110 contributions from individuals ranging from \$10 to \$1,000 and 10 small contributions \$25 or less totaling \$130.	\$13,429.00	10/8/2018	0
9/30-10/9/18	10/10/2018	Five-page C-3 report depicting 42 contributions from individuals ranging from \$30 to \$1,000; four PACs (House Democratic Campaign (\$50,000), Swinomish Tribal Community (\$1,000), WA Alliance for Gun (\$1,000) and Win With Women (\$500)).	\$62,710.00	10/15/2018	0
10/10-10/14/18	10/11/2018	Three-page C-3 report depicting 15 contributions from individuals ranging from \$26 to \$500; Seven PACs (RPEC (\$1,000), Kitsap County Central Labor (\$300), Nat'l Women's Political Caucus (\$100), Planned Parenthood Votes (\$500), WA Physical Therapy (\$500), WSPMA (\$200) and 26 <sup>th</sup> District Democrats (\$5,000)); and one small contribution of less than \$25 or less not itemized totaling \$25.	\$9,603.93	10/16/2018	0
10/15-10/17/18	10/19/2018	One-page C-3 report depicting three contributions from individuals ranging from \$100 to \$1,000 and two contributions from PACs (26 <sup>th</sup> District Democrats (\$5,000) and Confederated Tribes (\$100)).	\$6,700.00	10/19/2018	0

<b>Date Received</b>	<b>Date Deposited</b>	<b># of contributors and description</b>	<b>Total C-3 Amount</b>	<b>C-3 Filing Date</b>	<b>Days Late</b>
10/17-10/23/18	10/24/2018	Seven-page C-3 report depicting 67 contributions from individuals ranging from \$4.54 to \$500 and 187 small contributions \$25 or less not itemized totaling \$1,425.25.	\$7,125.41	10/29/2018	0
10/18-10/23/18	10/25/2018	Three-page C-3 report depicting seven contributions from individuals ranging from \$25 to \$500 and 13 PACs (SEIU Healthcare 1199NW (\$1,000), ATU Legislative Council WA (\$500), Children's Campaign Fund (\$500), Fuse Votes (\$500), IBEW Local 77 (\$577), LM PAC (\$1,000), Muckleshoot Indian Tribe (\$1,000), NARAL Pro-Choice Washington (\$300), Squaxin Island Tribe (\$500), Transportation for WAC (\$750), UA Local 32 Pipe (\$500) and WA St. Council of Firefighters (\$1,000)).	\$11,202.00	10/29/2018	0
10/25-10/26 /18	10/29/2018	Two-page C-3 report depicting three contributions from individuals ranging from \$75 to \$500 and five PACs (Fix it! (\$1,000), Inlandboatmen's Union PSR (\$1,000), MoveOn.org (\$500), PacNW Regional Council (\$500) and Sheet Metal Workers Local 66 (\$1,000)).	\$5,075.00	10/29/2018	0
10/27-10/30/18	10/31/2018	Two-page C-3 report depicting 12 contributions from individuals ranging from \$50 to \$200; four PACs (26 <sup>th</sup> District Democrats (\$1,500), PSE SEIU 1948 Political Fund (\$1,000), Civic Action PAC (\$1,000) and Sustainable Future (\$1,000)); and four small contributions \$25 or less not itemized totaling \$85.	\$5,575.00	10/31/2018	
10/29-1/4/2018	11/05/2018	13-page C-3 report depicting 137 contributions from individuals ranging from \$10 to \$500 and 10 small contributions \$25 or less not itemized totaling \$115.	\$11,155.00	11/12/2018	0
11/5-11/9/2018	11/9/2018	Two-page C-3 report depicting one contribution from an individual for \$1,000; one contribution from candidate's campaign committee for \$1,000 and six PACs (Aurora Borealis, Nat'l Women's Political Caucus, Olympic Peninsula Building, OneAmerica Votes Justice Fund, UAW Region 5 Western State and Cypress Creek Renewables)).	\$6,950.00	11/12/2018	0



<b>Date Received</b>	<b>Date Deposited</b>	<b># of contributors and description</b>	<b>Total C-3 Amount</b>	<b>C-3 Filing Date</b>	<b>Days Late</b>
11/12-11/18/18	11/19/2018	10-page C-3 report depicting 93 contributions from individuals ranging from \$5 to \$500 and 14 small contributions \$25 or less not itemized totaling \$148.	\$6,066.00	11/26/2018	0
12/11-12/27/18	12/28/2018	Three-page C-3 report depicting 12 contributions from individuals ranging from \$50 to \$150 and five PACs (K&L Gates Continuing PAC (\$200), People Power (\$1,000), Physicians Anesthesia Service (\$500), WA Medical (\$1,000) and WA State Dental (\$1,000)).	\$4,700	1/3/2019	0
<b>Totals</b>			<b>\$342,760.85</b>		

- PDC staff reviewed the 31 C-3 reports filed by the Campaign and listed in the chart above totaling \$342,760.85 which represented about 51.9 percent of the \$661,031.46 in total contributions received during the 2018 election cycle. As noted in the table above, the Campaign timely filed all 31 C-3 reports reviewed by staff as part of this audit.
- In addition, staff's review verified that the Campaign timely deposited the contributions received within five business days of receipt in accordance with RCW 42.17A.220 for the C-3 reports depicted in the above table.
- PDC staff downloaded the 2018 contribution database for the Campaign as a CSV file into an Excel spreadsheet, formatted and sorted the spreadsheet, and then conducted a review of the 2018 contributor information disclosed on C-3 reports. As part of that review, staff confirmed the Campaign complied with the 2018 election contribution limits which were \$1,000 for the primary and general elections for any individual, political committee, business, labor union, association, other entities and persons.
- Staff's review also indicated the Campaign disclosed the required Employer and Occupation information for 1922 individuals who contributed more than \$100 to the Campaign, totaling \$181,738.44 in contributions received.
- The PDC audit procedures include staff identifying contributors that made monetary contributions to the Campaign and then verifying or confirming information disclosed concerning those specific contributions. For this audit, staff verified or confirmed selected contributions received by the Campaign by reviewing the expenditure reports of continuing political action committees (PAC) that were registered and required to file C-3 and C-4 reports with the PDC in the 2018 election year, and made contributions to the Campaign in 2018.
- Staff reviewed the contribution spreadsheet and selected 10 PAC contributors that made monetary contributions totaling at least \$1,000 to the Campaign during the 2018 election, and also reviewed the corresponding C-3 reports filed by the Campaign disclosing each PAC's contribution. The review included listing the date the contributions were received, the date the contributions were deposited, and the date the C-3 reports were filed.

- Staff then reviewed the C-4 reports filed by the selected contributing PAC listed in the chart below for the corresponding contribution expenditure information disclosed on the Schedule A to C-4 report. The contribution information from the Campaign C-3 reports and the contribution expenditure information from the PAC C-4 reports were entered into the chart below and included the following:

<b>Date Received - Campaign</b>	<b>Contributor name</b>	<b>Amount</b>	<b>C-3 Report Filed</b>	<b>Date Made By Donor</b>	<b>Disclosed by Donor</b>
6/15/2018	Washington School Principals	\$1,000	7/2/2018	6/7/2018	C-4 report
7/01/2018	Washington Values PAC	\$2,000	7/9/2018	6/29/2018	C-4 report
7/30/2018	MoveOn.org PAC	\$1,000	8/1/2018	7/25/2018	C-4 report
08/06/2018	Sustainable Future PAC	\$1,000	8/13/2018	7/31/2018	C-4 report
09/04/2018	WA ST Nurses Association PAC	\$2,000	9/10/2018	8/27/2018	C-4 report
9/26/2018	Justice For All PAC	\$1,000	10/1/2018	8/7/2018	C-4 report
7/21/2018	WA Alliance for Gun Responsibility Victory Fund	\$1,000	7/30/2018	6/8/2018	C-4 report
10/18/2018	SEIU Healthcare 1199NW PAC	\$1,000	10/29/2018	10/12/2018	C-4 report
10/30/2018	Civic Action PAC	\$1,000	10/31/2018	10/19/2018	C-4 report
12/27/2018	People Power PAC	\$1,000	1/3/2019	12/11/2018	C-4 report

- The review indicated that the Campaign received and deposited all ten of the contributions selected for review within five business days of receipt as required by statute. As noted in the table above, the Campaign disclosed the contributors' names for the 10 monetary contributions from the PACs listed above within seven to 30 days after each PAC disclosed making the contributions.
- Staff based that information solely on the dates the expenditure for the contribution was disclosed as having been made by the PAC on the corresponding C-4 report, and the date the contribution was disclosed as having been received on the C-3 report filed by the Campaign.

**Timeliness and Accuracy in the filing of C-4 reports, providing expenditure information:**

- Candidates under the Full Reporting option in 2018 were required to file monthly C-4 reports by the 10th of each month disclosing contribution and expenditure activities incurred in the previous calendar month, and candidates appearing on the 2018 primary and general election ballots were required to file the following C-4 reports:
  1. A 21-day Pre-Primary Election C-4 report was due on July 17, 2018, covering the period June 1 through July 16, 2018.
  2. A 7-day Pre-Primary Election C-4 report was due on July 31, 2018, covering the period July 17 through July 30, 2018.
  3. A Post-Primary election C-4 report was due by September 10, 2018, covering the period August 1 through August 31, 2018.
  4. A 21-day Pre-General Election C-4 report was due on October 16, 2018, covering the period September 1 through October 15, 2018.

5. A 7-day pre-General Election C-4 report was due on October 30, 2018, covering the period October 16 through October 29, 2018.
  6. A Post-General Election C-4 report was due by December 10, 2018, covering the period October 30 through November 30, 2018.
- During 2018, the Campaign timely filed C-3 and C-4 reports throughout the year including the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports as detailed in the table below:

<b>C-4 Report</b>	<b>Date Due</b>	<b>Date Filed</b>	<b>Contributions Received</b>	<b>Expenditures Made</b>	<b>Expenditure details</b>	<b>Days Late</b>
December 2017 C-4 report	1/10/2018	1/10/2018	\$208.00	\$113.00	\$108 for 1-year post office box rental.	0
January 2018 C-4 report	2/12/2018	2/10/2018	\$20,715.58	\$4,336.94	\$2,500 for website development paid to Ironic Squid Design Studio; \$68.13 to Moxie Media Inc. for mileage reimbursement for photoshoot; \$100 to WA State Democrats for Vote builder Access; \$523.63 for Credit Card Fees paid to WEPAY.	0
February 2018 C-4 report	3/12/2018	3/12/2018	\$9,416.96	\$1,912.28	\$400 for Campaign Photoshoot paid to Brian Dalbalcon Photography; \$662.25 to Abbot Taylor for Treasury Services; and \$198.35 to Capitol City Press for 2,500 business cards.	
March 2018 C-4 report	4/10/2018	4/10/2018	\$11,598.56	\$4,599.47	\$3,500 made to Moxie Media Inc., for Campaign Consulting; and \$443.25 to Abbot Taylor for Treasury Services.	0

<b>C-4 Report</b>	<b>Date Due</b>	<b>Date Filed</b>	<b>Contributions Received</b>	<b>Expenditures Made</b>	<b>Expenditure details</b>	<b>Days Late</b>
April 2018 C-4 report	5/10/2018	5/10/2018	\$10,149.48	\$14,336.30	\$5,000 made to Moxie Media Inc., for Cap City Press (14,000 Lit Cards); \$880 to NGP Van, Inc., for Data Services; \$3,916.38 to Noal Alsharbini for Campaign Management; \$450 to Moxie Media Inc., for Trade Printery (1,000 remits); \$194.02 for March Mileage Reimbursement; \$135.69 to Staples for 100 Flyers; and \$351.75 to USPS for Stamps.	0
May 2018 C-4 report	6/11/2018	6/11/2018	\$32,270	\$21,205.01	\$2,500 paid to Moxie Media, Inc., for Campaign Consulting; \$874.50 to Abbot Taylor for April Treasury Services; \$477.76 to Secretary of State for Filing Fee; and \$3,281.46 to Noal Alsharbini for Campaign Management	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
21-Day Pre Primary C-4 report	7/17/2018	7/17/2018	\$71,556.42	\$78,632.94	Two expenditures made to McKenna Hartman \$2,464.33 for May Fundraising; \$1,318.50 to Abbot Taylor for May and June Treasury Services; \$1,328.38 to Emily Randall for Air Travel, Ferry and May Mileage Reimbursements; \$780 to NGP VAN, Inc., for Data Services; \$858 to Kitsap County Democrats for Campaign Office Rent; \$3,500 to Darci Larsen for Website Development; \$4,922.19 for Campaign Management; \$24,392 to Moxie Media, Inc., for Trade Printery (1,000 envelopes/letterheads, Design Services and production of 19,048 mailers through Capitol City Press; \$10,869.62 to Capitol City Press for postage for production of 57,220 mailers; \$229.55 to John Olson for Campaign Wages; \$423.64 to Mikayla Podesta for Campaign Wages; \$1,266 to Alexander Wenman for Campaign Wages; and \$559.72 to Fingers Duke Design Studio for 50 T-shirts.	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2018 7-Day Pre Primary C-4 report	7/31/2018	7/31/2018	\$27,750.29	\$13,664.15	Two expenditures made to Moxie Media, Inc., totaling to \$2,895 for 110 Yard Signs and \$4,000 Lit Cards produced by Capitol City Press; \$381.75 to USPS for Stamps; \$4,021.61 to Capitol City Press for Postage for 18,252 Mailers; \$1,640.73 to Noal Alsharbini for Campaign Management; \$229.55, 423.64, 229.55 and \$1,266.98 to John Olson, Mikayla Podesta, Isaac Santos and Alexander Wenman for Campaign Wages, respectively.	0
2018 Post-Primary C-4 report	9/10/2018	9/10/2018	\$50,107.20	\$31,130.81	\$11,732 paid to Moxie Media, Inc., for Targeted Online Ads: 7/17-81; \$499 to Facebook, Inc., for Online Ads: 7/27-7/30, 7/29-8/4 and 8/2-8/7; \$1,000 to Moxie Media, Inc., for Digital Ad Production and \$675 to Cap City Press through Moxie Media, Inc., for 100 Yard Signs;\$5,000 to Raven McShane for July and August Fundraising; \$2,535.26 to Noal Alsharbini for Campaign Management; \$335 to Noal Alsharbini for Office Depot Supplies; \$2,654.49 to Alexander Wenman for Campaign Wages; \$847.28 to Mikayla Podesta for Campaign Wages; \$459.10 to John Olson for Campaign Wages.	0

<b>C-4 Report</b>	<b>Date Due</b>	<b>Date Filed</b>	<b>Contributions Received</b>	<b>Expenditures Made</b>	<b>Expenditure details</b>	<b>Days Late</b>
2018 21-DayPre-General C-4 Report	10/16/2018	10/16/2018	\$292,610.49	\$172,807.20	Ten expenditures made to Moxie Media, Inc., totaling \$95,600 for Comcast Cable Advertising: 10/8-10/22; Online Ads and Production; "Lit Cards" and Signs; and Banners; \$8,835.31 paid to five Campaign staff for Campaign Wages; \$780 to NGP Van, Inc., for Data Services; and \$837 paid to Abbot Taylor for Treasury Services.	0
2018 7-DayPre-GeneralC-4 report	10/30/2018	12/10/2018 Amended - original/Initial report filed timely on 10/30/2018	\$92,524.94	\$228,400.33	\$168,843.80 paid to Moxie Media Inc., for Comcast: Cable Ads: 10/23-11/6, Cable Ad Production, DSPolitical for Online Ads: 10/20-11/6, Digital Ad Production, RhythmOne-ConnectedTV Ads: 10/20-11/6, DSPolitical Online Ads: 10/26-11/6, RhythmOne – ConnectedTV Ads: 10/26-11/6 and Capitol City Press; and \$6,900 to Capitol City Press for Postage for 27,130 Mailers.	0
2018 Post General election C-4 report	12/10/2018	12/10/2018	\$37,720.78	\$22,244.57	\$9,578.74 paid to Campaign staff; \$1,616.29 to Danielle George for Campaign Management; \$2,500 to Raven McShane for October Fundraising; \$1,367.25 to Abbot Taylor for October Treasury Services; and \$834.35 to The Sexton Group for Phone Calls: 11/5-11/6.	0

- The Campaign disclosed orders placed, debts or obligations on seven C-4 reports filed for the 2018 election cycle, that included: (1) \$12,732 in orders placed disclosed on the 7 Day Pre-Primary C-4 report for a digital ad production and targeted online ads; (2) \$4,365 in orders disclosed on the Post-Primary C-4 report for photo Shoot, video production and editing, rally signs and yard signs; (3) \$5,000 in pledges on the 21-Day Pre-General C-4 report; and (4) a \$4,000 obligation for “win bonus.”
- The C-4 reports timely disclosed expenditure information for payments made to vendors using Campaign funds, largely involving political advertisements, and other miscellaneous Campaign services during the 2018 election cycle. The vendors receiving the largest Campaign expenditures during the 2018 election included the following:
  1. The Campaign made 34 expenditures to Moxie Media, Inc., totaling \$318,543.73 for services that included cable advertising, online and digital ads, design and print services, mail piece design and printing, and consulting as detailed below:
    - Five expenditures totaling \$177,675 for cable TV advertising and cable ad production.
    - 12 expenditures totaling \$80,671 for online ads, digital ads and ad production.
    - 17 expenditures totaling \$49,356 for mail piece production, yard signs, design of “lit cards,” rally signs, banners, and general campaign consultation.
  2. The Campaign made five expenditures to Capitol City Press totaling \$21,990.50 towards postage for mailers.
  3. The Campaign made 51 expenditures totaling \$54,580 during the 2018 election to staff for Campaign management and wages.
- As part of the audit, PDC staff requested the Campaign to provide copies of the books of account maintained for 10 expenditures listed below that were made by the 2018 Campaign including supporting documentation such as invoices, receipts, cancelled checks, notes, emails and any other pertinent materials.
- On February 25, 2021, the Campaign sent an email to the PDC with several attachments providing the requested books of account documentation for the expenditures listed in the Audit letter.

#### **Audit Exhibit #1.**

PDC staff has included the Campaign expenditures selected for review below, along with a summary of each expenditure including the date, amount and a description of the services disclosed on the C-4 reports, and the documentation provided by the Campaign. A summary of the information provided by the Campaign was reviewed by staff for the expenditures listed below and included the following:

1. Two expenditures made to Moxie Media, Inc., totaling \$153,525 for two Comcast Cable TV buys that included a \$91,275 expenditure made on October 19, 2018, and a \$62,250 expenditure made on October 5, 2018.



- The documentation provided by the Campaign included a copy of a \$93,275 check (#1917) dated 10/19/18 and written payable to *Moxie Media, Inc.*, for invoice number 1685, for “Balance of cab ad buy (Comcast Spotlight)” for \$91,275 and “Production of 2<sup>nd</sup> ad for \$2,000; and a \$64,250 check (#1545) dated 10/05/18 and written payable to *Moxie Media, Inc.*, for invoice number 1545, for “Comcast cable buy 10/8 to 10/22” for \$62,250 and “Production (Chris Becerra)” for \$2,000.
2. Three expenditures made to Moxie Media, Inc., totaling \$63,890 for “Online Ads” that were ran through DS Political and included a \$23,000 expenditure made on October 1, 2018; a \$27,939.80 expenditure made on October 22, 2018; and a \$12,650 expenditure made on October 26, 2018.
    - The documentation provided by the Campaign included a copy of: (a) \$24,175 check (#1899) dated 10/1/18 and written payable to *Moxie Media, Inc.*, for invoice number 1514 (dated 9/28/2018) for “Digital ads (9/28 to 10/12) – DS Political” (\$23,000) and “Digital ads & video production” (\$1,175); and (b) \$46,364.80 check (#1918) dated 10/22/18 and written payable to Moxie Media Inc., for invoice number 1691 (dated 10/19/2018) for “Digital ad (10/20-11/6) DSPolitical” for \$27,939.80, “Digital ad production” for \$1,175 and “RythmOne (Connected tv) buy 10/20-11/6” for \$17,250; and (c) \$12,650 check (#1919) dated 10/26/18 and written payable to *Moxie Media, Inc.*, for invoice number 1793 (dated 10/26/2018) for “Additional digital buy.”
  3. Three expenditures made to Moxie Media, Inc., totaling \$34,046 for “Production of Mailers” that were ran through Capitol City Press and included a \$17,742 expenditure made on July 12, 2018; a \$9,654 expenditure made on October 26, 2018.
    - The documentation provided by the Campaign included a copy of: (a) \$17,742 check (#1282) dated 10/22/18 payable to *Moxie Media, Inc.*, (invoice number 1282) dated 7/12/18 for *Mailers #2, 3 & 4* and (b) \$9,654 check dated 10/29/18 written payable to Moxie Media, Inc., for invoice number 1800 dated 10/26/2018 for “Production of 30,169 pieces of (8.5” x 11,” 4 color cards).”
  4. Two expenditures made to Moxie Media, Inc., totaling \$24,150 for two “Connected TV Ad” buys made through RhythmOne that included a \$17,250 expenditure made on October 22, 2018, and a \$6,900 expenditure made on October 26, 2018.
    - The documentation provided by the Campaign included a copy of: (a) a \$6,900 check that was paid to *Moxie Media Inc.*, dated October 26, 2018 (check# 1919) for invoice number 1797 – dated 10/26/2018; and (b) One check for \$46,363.80 made payable to *Moxie Media Inc.*, dated 10/22/18 (check # 1918) for invoice number 1691– dated 10/19/2018. This check was for payment for three different items, including \$17,250 for *RythmOne-Connected TV buy*.
  5. Two expenditures totaling \$14,141 made to Capitol City Press that included a \$7,240.30 expenditure made on July 12, 2018, for “Postage for \$38,142 mailers,” and a \$6,900.92 expenditure made on October 29, 2018 for “Postage for \$27,130 mailers.”

- The documentation provided by the Campaign included a copy of: (a) \$7,240.30 check (#1839) that was paid to *Capitol City Press* dated 07/12/18 for invoice number Y61840B; and check number 1921 for \$6,900.92 written payable to *Capitol City Press* dated 10/29/18 for invoice number Y63968B.
6. Three expenditures totaling \$500 were made to Facebook, Inc., that included expenditures made on July 31, 2018 totaling \$90.50 for Online Ads that ran 7/27 to 7/30/2018; on August 4, 2018 totaling \$250 for Online Ads that ran 7/29-8/4/2018; and August 31, 2018 totaling \$159.57 for Online Ads that ran 8/2-8/7/2018.
- The documentation provided by the Campaign included a copy of a \$250 receipt from Facebook for Online Ad paid on August 4, 2018 and a second receipt for \$159 payment to Facebook for Online Ad paid on August 31, 2018.
7. The vendors that comprised the \$646.75 worth of expenditures made on June 1, 2018 and listed as “Expenses of \$50 or less.”
- The documentation provided by the Campaign included an itemized list of 28 vendors of “expenses of \$50 or less” from 6/1/2018 to 7/16/2018, totaling \$647.75 worth of expenses.

**Books of Account, maintaining campaign records, and internal control process:**

As part of the audit, PDC staff requested each campaign to provide information concerning general campaign practices such as internal compliance controls, procedures for processing, depositing, recording and disclosure of contribution, procedures for making and reporting expenditures, including for debts, obligations, and orders placed, in-kind contributions, and candidate loans. On February 25, 2021, the Campaign provided a response to staff’s questions about the internal control processes.”

**Audit Exhibit #2**

Campaign Contributions:

The Campaign stated that “Contributions received at the campaign PO box or at campaign events were collected and sent to or dropped off with the treasurer, and then deposited within the required five business days. The Campaign used NGP for campaign reporting, the treasurer entered the information in NGP and prepared the C3 reports before making the deposit. Online contributions were combined into a weekly C3 for the prior week’s online donations.” The Campaign further stated that “Information was directly received from the donor by NGP or imported by the treasurer, and all contributions reported on a C3 report.”

Campaign Expenditures:

The Campaign stated: “Expenditures were proposed by the campaign team and sent to the consultants for budgeting and fulfillment. The consultants worked with the subvendors to determine appropriate quantities, advertising methods, and/or run dates, and the candidate approves the expenditure before it moves forward. Invoices were either received by the campaign and forwarded to the treasurer for payment or received by the treasurer and forwarded

to the candidate for approval before paying. All expenses were entered into NGP when paid and reported with required descriptions on the next C4 report.” Additionally, prior to filing the C4, the treasurer would send an email to the candidate, relevant campaign staff and campaign consultants asking for any outstanding bills or orders, and any over the debt reporting threshold are added to the C4 as debts.

#### Contribution and Expenditure Reports:

The candidate would receive weekly reports regarding contribution and expenditure activities via email prior to filing for review and approval. The candidate would then approve before filing. Some reports with short turnaround times were filed when due, with or without prior approval by the candidate according to the Campaign. Any changes or additions were then incorporated into the report, either before filing or via amendment once the information is available.

Campaign records of contribution and expenditure information are stored electronically in the NGP database, as well as QuickBooks as part of the treasurer’s books. Additionally, “physical copies of invoices, check stubs, payroll tax forms, and PDC reports are kept for the IRS-required seven years.”

The Campaign treasurer, Abbot Taylor, was responsible for campaign records. Campaign records were available during the 2018 election cycle inspection period, however the Campaign did not receive any requests.

The Campaign issued reimbursements to the candidate and staff during the 2018 election cycle. All reimbursements were accompanied by a spreadsheet listing the relevant information, as well as scans or photos of the receipts.

#### IV.

##### Audit Documents Reviewed, Provided and Respondent Correspondence

- C-1, C-3 and C-4 reports filed by the 2018 Emily Randall for Senate Campaign covering the period February 1, through December 31, 2018.
- Email exchanges between PDC staff and Abbot Taylor, on behalf of the 2018 Emily Randall for Senate Campaign.
- PDC staff queried the PDC Contribution and Expenditure database for the 2018 Emily Randall for Senate Campaign contribution and expenditure information covering the period of February 1 through December 31, 2018.

#### V.

##### Statutes and Rules

- **RCW 42.17A.235 and 240** require continuing political committees under the Full Reporting Option to file timely, accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the committee. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. Beginning June 1<sup>st</sup> for every political

committees participating in an election, C-4 reports are required 21 and 7 days before each election in which the committee receives contributions or makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same time and are required to be disclosed on a C-3 report filed every Monday for monetary contributions deposited into the committee bank account the previous five business days.

- **RCW 42.17A.220** requires political committee to deposit monetary contributions received to be deposited by political committee members, paid staff, or treasurers in a depository in an account established and designated for that purpose. Such deposits shall be made within five business days of receipt of the contribution.

Respectfully submitted this \_\_\_\_ day of March 2021.

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Erick O. Agina  
PDC Compliance Officer

#### **Audit Exhibits**

**Audit Exhibit #1** Documents provided by the 2018 Emily Randall for Senate Campaign to the PDC on February 4, 2021, concerning the expenditures selected for audit.

**Audit Exhibit #2** Letter from the 2018 Emily Randall for Senate Campaign Treasurer provided by the Campaign to the PDC on February 25, 2021, concerning the campaign practices and procedures.

## Capitol City Press

2975 37th Ave SW Tumwater WA 98512-  
Phone: (360) 943-3556 Fax: (360) 943-2140

## Invoice for Postage

**Attn** Henry  
Moxie Media Inc  
PO Box 30084  
Seattle WA 98113

**Job Name:** RANDALL COMBO #2  
GOVERNMENT  
**Invoice #** Y61840A **CustCode:** 5142  
**Invoice Date:** 7/12/2018  
**PO#:**

### Invoice Details

**Job Number:** Y61840A

**Project:** RANDALL COMBO #2 GOVERNMENT

**Postage Due In:** 7/16/2018

**Postage Affixed:** CCP Company

**Drop Date:** 7/18/2018

**Postage Amount:** \$3,620.15

**Expected Qty.:** 19,071

### Special Instructions:

If you are mailing on our permit account, please make your check payable to Capitol City Press  
Please indicate on your check memo or description line that this check is for "Postage Pre-payment"  
Include a photocopy of this invoice with your payment.

## Capitol City Press

2975 37th Ave SW Tumwater WA 98512-  
Phone: (360) 943-3556 Fax: (360) 943-2140

## Invoice for Postage

**Attn** Henry  
Moxie Media Inc  
PO Box 30084  
Seattle WA 98113

**Job Name:** RANDALL COMBO #3  
INDEPENDENT  
**Invoice #** Y61840B **CustCode:** 5142  
**Invoice Date:** 7/12/2018  
**PO#:**

### Invoice Details

**Job Number:** Y61840B

**Project:** RANDALL COMBO #3 INDEPENDENT

**Postage Due In:** 7/23/2018

**Postage Affixed:** CCP Company

**Drop Date:** 7/25/2018

**Postage Amount:** \$3,620.15

**Expected Qty.:** 19,071

### Special Instructions:

If you are mailing on our permit account, please make your check payable to Capitol City Press  
Please indicate on your check memo or description line that this check is for "Postage Pre-payment"  
Include a photocopy of this invoice with your payment.

Capitol City Press

07/12/18

postage for mailer #2  
postage for mailer #3

3,620.15  
3,620.15

KeyBank

#Y61840A/B postage prepayment

7,240.30

**Job Number:** Y61840B

**Project:** RANDALL COMBO #3 INDEPENDENT

**Postage Due In:** 7/23/2018

**Postage Affixed:** CCP Company

**Drop Date:** 7/25/2018

**Postage Amount:** \$3,620.15

**Expected Qty.:** 19,071

**Special Instructions:**

If you are mailing on our permit account, please make your check payable to Capitol City Press

Please indicate on your check memo or description line that this check is for "Postage Pre-payment"

Include a photocopy of this invoice with your payment.

## Capitol City Press

2975 37th Ave SW Tumwater WA 98512-  
Phone: (360) 943-3556 Fax: (360) 943-2140

## Invoice for Postage

**Attn** Henry  
Moxie Media Inc  
PO Box 30084  
Seattle WA 98113

**Job Name:** RANDALL #8  
**Invoice #** Y63968B **CustCode:** 5142  
**Invoice Date:** 10/25/201  
**PO#:**

### Invoice Details

**Job Number:** Y63968B

**Project:** RANDALL #8

**Postage Due In:** 10/30/2018

**Postage Affixed:** CCP Company

**Drop Date:** 10/31/2018

**Postage Amount:** \$6,900.92

**Expected Qty.:** 27,130

### Special Instructions:

If you are mailing on our permit account, please make your check payable to Capitol City Press  
Please indicate on your check memo or description line that this check is for "Postage Pre-payment"  
Include a photocopy of this invoice with your payment.



postage for mailer #8

KeyBank

#Y63968B postage prepayment

6,900.92

Receipt for Emily Randall

Account ID 15489115



Payment Date  
Aug 4, 2018, 1:21 AM

Payment Method  
MasterCard  
Reference Number RVNZVGWBE2

Paid

\$231.89 USD

Transaction ID  
1763802417066226-3591022

You're being billed because you reached your billing threshold

Product type  
Facebook

Campaigns

Post: "I'm running to be your State Senator because I..."	\$231.89
From Jul 29 2018 4:00 PM to Aug 4 2018 1:21 AM	
Post "I'm running to be your State Senator because I..."	24,345 impressions
	\$231.89

Receipt for Emily Randall

Account ID 15489115



Payment Date  
Aug 4, 2018, 1:21 AM

Payment Method  
MasterCard  
Reference Number SVNZVGWBE2

Paid

\$18.11 USD

Transaction ID  
1763802420399559-3591023

You're being billed because you reached your billing threshold

Product type  
Instagram

Campaigns

Post: "I'm running to be your State Senator because I..."	\$18.11
From Jul 30 2018 3:00 AM to Aug 4 2018 1:00 AM	
Post "I'm running to be your State Senator because I..."	2,028 impressions
	\$18.11

Receipt for Emily Randall

Account ID 15489115



Payment Date  
Aug 31, 2018, 9:51 AM

Payment Method  
MasterCard  
Reference Number KHYF6HECE2

Transaction ID  
1793326447447160-3660547

Product type  
Facebook

Paid

**\$159.57 USD**

Remaining ad costs at the end of the month

Campaigns

Post: "I'm running to be your State Senator because I..."	<b>\$159.57</b>
From Aug 2, 2018 6:00 PM to Aug 7, 2018 5:30 AM	
Post: "I'm running to be your State Senator because I..."	\$159.57
17,149 impressions	



# Invoice

Invoice number: 3474666897

Google LLC

1600 Amphitheatre Pkwy

Mountain View, CA 94043

United States

Federal Tax ID: 77-0493581

### Bill to

Emily Randall for Senate

PO BOX 12066

Seattle, WA 98102

United States

### Details

Invoice number .....3474666897  
 Invoice date .....Jun 30, 2018  
 Billing ID .....0632-7687-2541  
 Domain name .....electemilyrandall.com

### Google Cloud - GSuite

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Total in USD	<b>\$27.53</b>
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### Summary for Jun 1, 2018 - Jun 30, 2018

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Subtotal in USD	\$25.00
State sales tax (6.5%)	\$1.63
Local sales tax (3.6%)	\$0.90
Total in USD	\$27.53

Subscription	Description	Interval	Quantity	Amount(\$)
G Suite Basic	Usage	Jun 1 - Jun 30	5	25.00
Subtotal in USD				\$25.00
State sales tax (6.5%)				\$1.63
Local sales tax (3.6%)				\$0.90
Total in USD				<b>\$27.53</b>



# Invoice

Invoice number: 3463288750

Google LLC

1600 Amphitheatre Pkwy

Mountain View, CA 94043

United States

Federal Tax ID: 82-2182297

### Bill to

Emily Randall for Senate

PO BOX 12066

Seattle, WA 98102

United States

### Details

Invoice number .....3463288750  
 Invoice date .....May 31, 2018  
 Billing ID .....0632-7687-2541  
 Domain name .....electemilyrandall.com

### Google Cloud - GSuite

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Total in USD **\$23.43**

### Summary for May 1, 2018 - May 31, 2018

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Subtotal in USD	\$21.28
State sales tax (6.5%)	\$1.38
Local sales tax (3.6%)	\$0.77
Total in USD	\$23.43

Audit Exhibit #1  
Page 11 of 59

Subscription	Description	Interval	Quantity	Amount(\$)
G Suite Basic	Usage	May 1 - May 23	4	14.83
G Suite Basic	Usage	May 24 - May 31	5	6.45
Subtotal in USD				\$21.28
State sales tax (6.5%)				\$1.38
Local sales tax (3.6%)				\$0.77
Total in USD				<b>\$23.43</b>

Audit Exhibit #1  
Page 12 of 59



### Mileage Form

<b>Name:</b>		<b>Alex Wenman</b>		<b>Date Submitted:</b>		<b>7/10/2018</b>
<b>Mailing Address :</b> 5115 24th Avenue NE, Seattle, WA 98105						
Item #	Date	Miles Driven	Purpose (Meeting, Event, Etc.)	Total		
1	7/1/18	27	Fundraiser in Edmonds - Senator Lias'	\$14.72		
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
<b>Total</b>				<b>\$14.72</b>		





<u>Withdrawals</u>	<u>Date</u>	<u>Serial #</u>	<u>Location</u>	
	7-2		Google *Svc sapp Cc@Google.Com CA USA	\$27.53
	7-2		Direct Withdrawal, Irs Usataxpymt	577.94
	7-3		Direct Withdrawal, Frst Bk Mrch Svcdiscout	320.16
	7-5		Direct Withdrawal, Actbluedonate 6175177600	16.63
	7-10		Wpy*Action Netw 855-4693729 CA USA	10.00
	7-10		POS Mac Usps Po 5 212 Seattle WA	24.70
	7-10		Direct Withdrawal, Vantiv Ecommercefunds Disb	25.02
	7-16		Direct Withdrawal, Irs Usataxpymt	1,000.26
	7-18		Fingers Duke Bremerton WA USA	559.72
	7-23		Direct Withdrawal, Labor&Industriesl&l Elf	89.66
	7-23		Direct Withdrawal, State of WA-Esd Esd ACH 6	152.72
	7-27		Usps.Com Postal 800-275-8777 MO USA	381.75
	7-30		Direct Withdrawal, Irs Usataxpymt	1,076.78
	7-31		Facebk Xxxzugwb Menlo Park CA USA	88.32
	7-31		Facebk Zxxzugwb Menlo Park CA USA	2.18
			<b>Total subtractions</b>	<b>\$60,175.01</b>

Contact Name	Date Issued	Amount	Period	Cycle
Google	6/1/2018	23.43	Primary	2018
ActBlue	6/4/2018	13.97	Primary	2018
Alsharbini, Noal	6/6/2018	10.00	Primary	2018
Alsharbini, Noal	6/6/2018	10.49	Primary	2018
Alsharbini, Noal	6/6/2018	13.16	Primary	2018
Alsharbini, Noal	6/6/2018	35.99	Primary	2018
Alsharbini, Noal	6/6/2018	44.39	Primary	2018
Randall, Emily	6/6/2018	2.36	Primary	2018
Randall, Emily	6/6/2018	7.95	Primary	2018
Randall, Emily	6/6/2018	23.60	Primary	2018
Randall, Emily	6/6/2018	49.52	Primary	2018
The Action Network	6/11/2018	10.00	Primary	2018
Vantiv	6/11/2018	43.70	Primary	2018
Google	7/2/2018	27.53	Primary	2018
ActBlue	7/5/2018	16.63	Primary	2018
The Action Network	7/9/2018	10.00	Primary	2018
USPS	7/10/2018	24.70	Primary	2018
Vantiv	7/10/2018	46.03	Primary	2018
ActBlue	7/11/2018	12.50	Primary	2018
Alsharbini, Noal	7/12/2018	8.14	Primary	2018
Alsharbini, Noal	7/12/2018	14.56	Primary	2018
Alsharbini, Noal	7/12/2018	39.05	Primary	2018
Randall, Emily	7/12/2018	16.70	Primary	2018
Randall, Emily	7/12/2018	18.00	Primary	2018
Wenman, Alexander	7/12/2018	14.72	Primary	2018
Kitsap County Democrats	7/16/2018	22.11	Primary	2018
Kitsap County Democrats	7/16/2018	42.54	Primary	2018
Kitsap County Democrats	7/16/2018	44.98	Primary	2018
		<u>646.75</u>		

Purpose  
Email Services  
CC Processing  
Impark - Campaign Parking  
Target - Parade Candy  
Dollar Tree (Lacey) - Event Supplies  
Fred Meyer/House of Donuts - Snacks  
Safeway - Food & Drinks for Vols & Event  
Postage  
Campaign Meetings  
Campaign Parking Reimbursement  
Slaughter County Brewing - Pizza for Council Meeting  
Data Services  
Credit Card Processing  
Email Services  
Credit Card Processing  
Data Services  
Overnight Postage for Postage Check  
Credit Card Processing  
Credit Card Processing  
Peninsula Trophy - Name Badge  
Fred Meyer - Parade Candy  
Office Depot - Office Supplies  
WSF - Ferry  
Campaign Parking  
Mileage Reimbursement  
Waste Management - Garbage  
PSE - Electricity  
Comcast - Internet



**Additions**  
(con't)

<i>Deposits</i>	<i>Date</i>	<i>Serial #</i>	<i>Source</i>	
	6-15		Direct Deposit, Vantiv Ecommercefunds Disb	50.00
	6-15		Deposit Branch 0255 Washington	350.00
	6-18		Direct Deposit, Frst Bk Mrch Svcdeposit	26.00
	6-18		Direct Deposit, Frst Bk Mrch Svcdeposit	100.00
	6-19		Direct Deposit, Vantiv Ecommercefunds Disb	5.58
	6-19		Direct Deposit, Frst Bk Mrch Svcdeposit	1,500.00
	6-20		Direct Deposit, Frst Bk Mrch Svcdeposit	100.00
	6-20		Direct Deposit, Vantiv Ecommercefunds Disb	496.94
	6-21		Direct Deposit, Vantiv Ecommercefunds Disb	20.18
	6-21		Deposit Branch 0255 Washington	4,595.00
	6-22		Direct Deposit, Frst Bk Mrch Svcdeposit	120.00
	6-25		Direct Deposit, Vantiv Ecommercefunds Disb	21.25
	6-25		Direct Deposit, Frst Bk Mrch Svcdeposit	300.00
	6-25		Direct Deposit, Frst Bk Mrch Svcdeposit	332.00
	6-25		Direct Deposit, Frst Bk Mrch Svcdeposit	700.00
	6-26		Direct Deposit, Vantiv Ecommercefunds Disb	1.01
	6-27		Direct Deposit, Vantiv Ecommercefunds Disb	65.09
	6-27		Direct Deposit, Frst Bk Mrch Svcdeposit	1,050.00
	6-28		Direct Deposit, Frst Bk Mrch Svcdeposit	26.00
	6-28		Direct Deposit, Vantiv Ecommercefunds Disb	50.00
	6-29		Direct Deposit, Frst Bk Mrch Svcdeposit	540.00
	6-29		Deposit Branch 0255 Washington	8,500.00
<b>Total additions</b>				<b>\$24,810.53</b>

**Subtractions**

*Paper Checks*                      \* check missing from sequence

<i>Check</i>	<i>Date</i>	<i>Amount</i>	<i>Check</i>	<i>Date</i>	<i>Amount</i>	<i>Check</i>	<i>Date</i>	<i>Amount</i>
1810	6-29	\$371.81	1824	6-5	693.00	1828	6-25	858.00
*1821	6-1	1,640.73	1825	6-12	284.05	1829	6-18	253.21
1822	6-4	175.00	1826	6-11	658.42	1830	6-18	1,640.73
1823	6-8	2,464.33	1827	6-12	780.00	*1832	6-18	975.00
<b>Paper Checks Paid</b>							<b>\$10,794.28</b>	

<i>Withdrawals</i>	<i>Date</i>	<i>Serial #</i>	<i>Location</i>	
	6-4		Google *Svcsapp Cc@Google.Com CA USA	\$23.43
	6-4		Direct Withdrawal, Actbluedonate 6175177600	13.97
	6-4		Direct Withdrawal, Frst Bk Mrch Svcdiscount	402.89
	6-11		Wpy*Action Netw 855-4693729 CA USA	10.00
	6-11		Direct Withdrawal, Vantiv Ecommercefunds Disb	43.70
	6-15		Direct Withdrawal, Irs Usat taxpymt	507.00
<b>Total subtractions</b>				<b>\$11,795.27</b>

### Reimbursement Form

<b>Name:</b>		Emily Randall		<b>Date Submitted:</b>		7/10/2018	
<b>Mailing Address :</b>		1740 Gregory Way, Bremerton, WA					
Item #	Date	Vendor Name	Purpose (Food, Stamps, Decorations, etc)	Total			
1	6/30/18	Emily Randall - Round Table Pizza	Food for doorbell volunteers	\$107.18			
2	6/25/18	Emily Randall - ABM Parking Services	Parking for gun messaging workshop	\$12.00			
3	7/2/18	Emily Randall - Port Of Kingston	Parking travel to house party in edmonds	\$6.00			
4	7/1/18	Emily Randall - WA State Ferries	Ferry to Edmonds House Party	\$16.70			
5	7/3/18	Emily Randall - USPS	Postage for postcards	\$315.00			
6	7/3/18	Emily Randall - USPS	Postage for postcards	\$42.00			
7	7/2/18	Emily Randall - USPS	Postage for postcards	\$36.00			
8							
9							
10							
11							
				<b>Total</b>	<b>\$534.88</b>		

Please return form with all receipt documentation

Emily Randall

07/12/18

pizza for vols  
parking  
ferry  
stamps

107.18  
18.00  
16.70  
393.00

KeyBank

534.88





campaign office utilities

07/16/18

1047  
109.63

KeyBank

109.63

**In-Kind Contribution Form: May**

<b>Name:</b>		<b>Emily Randall</b>	<b>Date Submitted:</b>		<b>6/5/2018</b>
<b>Mailing Address</b>		1740 Gregory Way, Bremerton, WA 98337			
<b>Employer:</b>		None		<b>Occupation:</b> Candidate	
<b>Item #</b>	<b>Date</b>	<b>Vendor Name</b>	<b>Purpose (Food, Stamps, Decorations, etc)</b>	<b>Total</b>	
1	5/21/18	Emily Randall - Alaska Airlines	Flight to Boston for fundraiser(s)	\$456.40	
2	5/21/18	Emily Randall - WA State Ferries	Travel from endorsement meeting	\$18.70	
3	5/14/18	Emily Randall - Impark Lot 166	Meeting with Governor Inslee	\$19.60	
4	5/9/18	Emily Randall - Anthem Coffee & Tea	Meeting with Sheetmetal Workers	\$4.95	
5	5/14/18	Emily Randall - WA State Ferries	To Endorsement interview	\$18.70	
6	5/16/18	Emily Randall - Hackers Bar & Grill	Meeting with Longshoremen	\$3.00	
7	5/18/18	Emily Randall - WA State Ferries	Home from endorsement meeting	\$18.70	
8	5/17/18	Emily Randall - Slaughter County Brewing Co.	Youth Council Meeting - Pizza	\$49.52	
9	5/20/18	Emily Randall - Safeway	Beer for Fundraiser	\$62.49	
10	5/14/18	Emily Randall - State of WA Capitol Campus	Filing Day Parking	\$4.00	
11	5/21/18	Emily Randall - The Station at Fishermen's Terminal	Postage	\$2.36	
				<b>Total</b>	<b>\$658.42</b>

Please return form with all receipt documentation

Emily Randall

06/06/18

airfare for fundraisers  
 WSF  
 parking  
 postage  
 food/beer/meetings

456.40 ✓  
 56.10 ✓  
 23.60  
 2.36  
 119.96

KeyBank

658.42

*Handwritten:* 1826

*Handwritten:* 1826

Account	Check #	Amount	Date	Description
KeyBank		658.42		

**In-Kind Contribution Form: May**

<b>Name:</b>		<b>Noal Alsharbini</b>	<b>Date Submitted:</b>		<b>6/5/2018</b>
<b>Mailing Address</b>		9660 Bridgeport Way SW, Lakewood, WA 98499			
<b>Employer:</b>		Emily Randall for Senate		<b>Occupation:</b>	Campaign Manager
<b>Item #</b>	<b>Date</b>	<b>Vendor Name</b>	<b>Purpose (Food, Stamps, Decorations, etc)</b>	<b>Total</b>	
1	5/18/18	Noal Alsharbini - Target	Hershey Candle Bag for Parade Booth	\$10.49	
2	5/19/18	Noal Alsharbini - Safeway	water & snack for volunteers	\$7.50	
3	5/19/18	Noal Alsharbini - Safeway	beverages for fundraiser event	\$36.89	
4	5/19/18	Noal Alsharbini - Dollar Tree Stores, Inc	office supplies/ utensils for fundraiser	\$13.16	
5	5/18/18	Noal Alsharbini - Office Depot Office Max	Ink for printer/ paper for printer	\$103.60	
6	5/18/18	Noal Alsharbini - Party City	Dessert Plates and utensils for fundraiser	\$28.31	
7	5/18/18	Noal Alsharbini - Party City	Cups and balloon pump for fundraiser	\$38.11	
8	5/12/18	Noal Alsharbini - House of Donuts	Donuts for Volunteers	\$15.25	
9	5/28/18	Noal Alsharbini - Fred Meyer	Youth Council snacks / utensils	\$13.13	
10	6/3/18	Noal Alsharbini - Fred Meyer	snacks for volunteers	\$7.61	
11	5/29/18	Noal Alsharbini - IMPARK00250146A	Parking in Seattle for meeting w/ FUSE	\$10.00	
				<b>Total</b>	<b>\$284.05</b>

Please return form with all receipt documentation



Moxie Media Inc  
PO Box 30084  
Seattle, WA 98113  
206.604.5121  
henry@moxiemedia.biz

# Invoice

**BILL TO**

Emily Randall  
Emily Randall for Washington State  
Senate  
PO Box 1883  
Port Orchard, WA 98366

INVOICE #	DATE	TOTAL DUE			ENCLOSED
1257	07/09/2018	\$6,650.00			

ACTIVITY	AMOUNT
Professional services and coordination of Randall variable data letter (Primary #1) to 19,079HH (Cap City)	6,650.00

BALANCE DUE

**\$6,650.00**

Moxie Media, Inc.

matter #1

07/09/18

1837

6,650.00

|

KeyBank

#1257

6,650.00

6,650.00

PAID



Moxie Media Inc  
 PO Box 30084  
 Seattle, WA 98113  
 206.604.5121  
 henry@moxiemedia.biz

# Invoice

**BILL TO**

Emily Randall  
 Emily Randall for Washington State  
 Senate  
 PO Box 1883  
 Port Orchard, WA 98366

INVOICE #	DATE	TOTAL DUE			ENCLOSED
1282	07/12/2018	\$17,742.00			

ACTIVITY	AMOUNT
Professional services and coordination of (6" x 11", 4 color cards) Randall #2 "Olivia/Healthcare" to 19,079HH	5,914.00
Professional services and coordination of (6" x 11", 4 color cards) Randall #3 "Bipartisan" to 19,079HH	5,914.00
Professional services and coordination of (6" x 11", 4 color cards) Randall #4 "A Champion For Us" to 19,079HH	5,914.00

BALANCE DUE

**\$17,742.00**

KeyBank

#1282

17,742.00

Moxie Media Inc  
PO Box 30084  
Seattle, WA 98113  
206.604.5121  
henry@moxiemedia.biz

# Invoice



**BILL TO**

Emily Randall  
Emily Randall for Washington State  
Senate  
PO Box 1883  
Port Orchard, WA 98366

INVOICE #	DATE	TOTAL DUE			ENCLOSED
1514	09/28/2018	\$24,175.00			

ACTIVITY	AMOUNT
Digital ads (9/28 to 10/12) - DSPolitical	23,000.00
Digital ads & video production	1,175.00

BALANCE DUE

**\$24,175.00**

Moxie Media, Inc.

10/01/18

online ads 9/28-10/12  
ad production

23,000.00  
1,175.00

KeyBank

#1514

24,175.00

Moxie Media Inc  
PO Box 30084  
Seattle, WA 98113  
206.604.5121  
henry@moxiemedia.biz

# Invoice



**BILL TO**

Emily Randall  
Emily Randall for Washington State  
Senate  
PO Box 1883  
Port Orchard, WA 98366

INVOICE #	DATE	TOTAL DUE			ENCLOSED
1545	10/04/2018	\$64,250.00			

ACTIVITY	AMOUNT
Comcast cable buy 10/8 to 10/22	62,250.00
Production (Chris Becerra)	2,000.00

BALANCE DUE

**\$64,250.00**

Comcast - cable ads: 10/8-10/22  
ad production

10/05/18

1903

62,250.00  
2,000.00

KeyBank

#1545

64,250.00

Moxie Media Inc  
 PO Box 30084  
 Seattle, WA 98113  
 206.604.5121  
 henry@moxiemedia.biz

# Invoice



**BILL TO**

Emily Randall  
 Emily Randall for Washington State  
 Senate  
 PO Box 1883  
 Port Orchard, WA 98366

INVOICE #	DATE	TOTAL DUE			ENCLOSED
1685	10/18/2018	\$93,275.00			

ACTIVITY	AMOUNT
Balance of cab ad buy (Comcast Spotlight)	91,275.00
Production of 2nd ad	2,000.00

BALANCE DUE

**\$93,275.00**

cable ads: 10/23-11/6  
ad production

10/19/18

1917

91,275.00  
2,000.00

KeyBank

#1685

93,275.00

*Handwritten:* 10/19/18



Moxie Media Inc  
 PO Box 30084  
 Seattle, WA 98113  
 206.604.5121  
 henry@moxiemedia.biz

# Invoice



**BILL TO**

Emily Randall  
 Emily Randall for Washington State  
 Senate  
 PO Box 1883  
 Port Orchard, WA 98366

INVOICE #	DATE	TOTAL DUE			ENCLOSED
1691	10/19/2018	\$46,364.80			

ACTIVITY	AMOUNT
Digital ad (10/20-11/6) DSPolitical	27,939.80
Digital ad production	1,175.00
RythmOne (Connected tv) buy 10/20-11/6	17,250.00

BALANCE DUE

**\$46,364.80**

10/22/18

1918

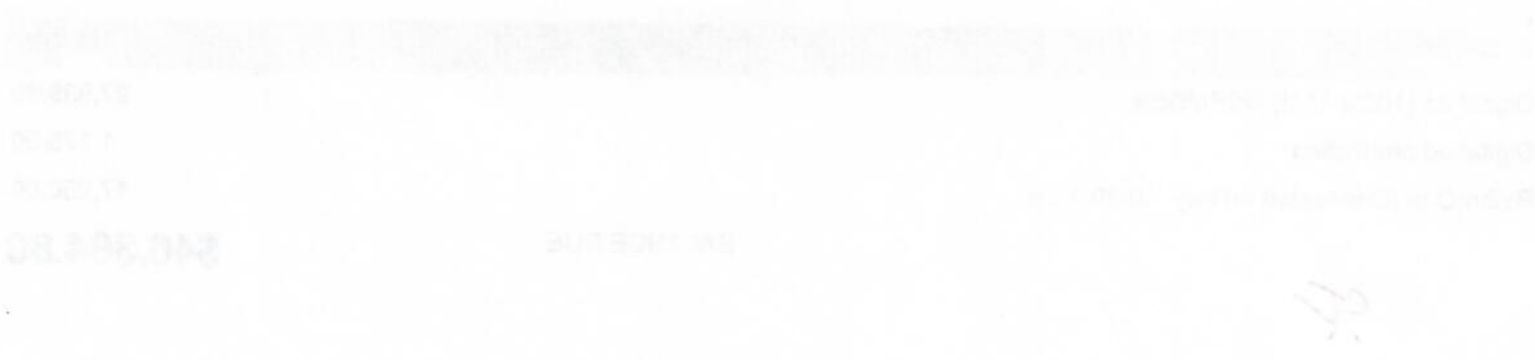
online ads: 10/20-11/6  
ad production  
RhythmOne ads: 10/20-11/6

27,939.80  
1,175.00  
17,250.00

KeyBank

#1691

46,364.80



Moxie Media Inc  
PO Box 30084  
Seattle, WA 98113  
206.604.5121  
henry@moxiemedia.biz

# Invoice



**BILL TO**

Emily Randall  
Emily Randall for Washington State  
Senate  
PO Box 1883  
Port Orchard, WA 98366

INVOICE #	DATE	TOTAL DUE			ENCLOSED
1793	10/26/2018	\$12,650.00			

ACTIVITY	AMOUNT
Additional digital buy	12,650.00

BALANCE DUE

**\$12,650.00**

**From:** Henry Underhill henry@moximedia.biz  
**Subject:** Re: Invoice 1793 from Moxie Media Inc  
**Date:** October 26, 2018 at 11:42 AM  
**To:** Abbot Taylor abbot312@mac.com



10/26 to 11/6

On Oct 26, 2018, at 11:27 AM, Abbot Taylor <[abbot312@mac.com](mailto:abbot312@mac.com)> wrote:

Run dates?

On Oct 26, 2018, at 11:23 AM, Moxie Media Inc <[quickbooks@notification.intuit.com](mailto:quickbooks@notification.intuit.com)> wrote:



Moxie Media Inc

Additional digital buy for Randall.

Thanks,

Henry Underhill  
Moxie Media  
[henry@moximedia.biz](mailto:henry@moximedia.biz)  
206.604.5121

INVOICE 1793 DETAILS

**\$12,650.00**

Print or save

Powered by QuickBooks

**Bill to**

Emily Randall  
Emily Randall for Washington State  
Senate  
PO Box 1883  
Port Orchard, WA 98366

**Audit Exhibit #1**  
**Page 40 of 59**

Moxie Media Inc  
PO Box 30084  
Seattle, WA 98113  
206.604.5121  
henry@moxiemedia.biz

# Invoice



**BILL TO**

Emily Randall  
Emily Randall for Washington State  
Senate  
PO Box 1883  
Port Orchard, WA 98366

INVOICE #	DATE	TOTAL DUE			ENCLOSED
1797	10/26/2018	\$6,900.00			

ACTIVITY	AMOUNT
Additional ConnectTV buy (10/26-11/6)	6,900.00

BALANCE DUE

**\$6,900.00**

10/26/18

1919

online ads: 10/26-11/6  
RhythmOne ads: 10/26-11/6

12,650.00  
6,900.00

KeyBank

#1793/1797

19,550.00

*Handwritten signature or initials*

Moxie Media Inc  
PO Box 30084  
Seattle, WA 98113  
206.604.5121  
henry@moxiemedia.biz

# Invoice



**BILL TO**

Emily Randall  
Emily Randall for Washington State  
Senate  
PO Box 1883  
Port Orchard, WA 98366

INVOICE #	DATE	TOTAL DUE			ENCLOSED
1800	10/26/2018	\$9,654.00			

ACTIVITY	AMOUNT
Production of 30,169 pieces of (8.5" x 11", 4 color cards) Randall #8	9,654.00

BALANCE DUE

**\$9,654.00**

10/29/18

1920  
9,654.00

mailer #8

KeyBank

#1800

9,654.00

00,160,00  
AUG 2018 JAN





Fee Report: Emily Randall for Senate (by Activity Date 04/13/2018 - 07/16/2018)

Settlement Currency: USD

Total Fees: -152.89 Vantiv Fees: -37.15 Passthrough Fees: -115.74

Vantiv Fees by Category

Category/Method of Payment	Description	Txn Count	Fee per Txn	Transaction Amount	Transaction % Fee	Total Fees
Payments Acceptance		668				-37.15
Authorizations		213				-4.26
VISA		167				-3.34
	Vantiv Visa Authorization	165	-0.0200	3,008.17	0.0000%	-3.30
	Vantiv Visa Authorization - Declined	2	-0.0200	355.56	0.0000%	-0.04
MasterCard		38				-0.76
	Vantiv MasterCard Authorization	34	-0.0200	529.52	0.0000%	-0.68
	Vantiv MasterCard Authorization - Declined	4	-0.0200	46.53	0.0000%	-0.08
American Express		3				-0.06
	Vantiv American Express Authorization	3	-0.0200	55.27	0.0000%	-0.06
Discover		5				-0.10
	Vantiv Discover Card Authorization	4	-0.0200	54.96	0.0000%	-0.08
	Vantiv Discover Card Authorization - Declined	1	-0.0200	2.50	0.0000%	-0.02
Deposit/Refunds		404				-7.39
VISA		332				-6.08
	Vantiv Visa Digital Enablement Fee	165	0.0000	3,008.17	-0.0150%	-0.43
	Vantiv Visa Deposit-Settled	165	-0.0300	3,008.17	-0.0200%	-5.59
	Vantiv Visa Refund-Settled	2	-0.0300	13.95	0.0000%	-0.06
MasterCard		68				-1.18
	Vantiv MasterCard Digital Enablement Fee	34	0.0000	529.52	-0.0150%	-0.07
	Vantiv MasterCard Deposit-Settled	34	-0.0300	529.52	-0.0200%	-1.11
Discover		4				-0.13
	Vantiv Discover Card Deposit-Settled	4	-0.0300	54.96	-0.0200%	-0.13
Funds Transfers		51				-25.50
Not Applicable		51				-25.50
	Vantiv Credit ACH Transfer on 04/16/2018	1	-0.5000	50.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/17/2018	1	-0.5000	92.23	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/23/2018	1	-0.5000	3.57	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/24/2018	1	-0.5000	33.15	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/25/2018	1	-0.5000	3.57	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/26/2018	1	-0.5000	100.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/27/2018	1	-0.5000	25.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/30/2018	1	-0.5000	1.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/01/2018	1	-0.5000	100.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/04/2018	1	-0.5000	142.85	0.0000%	-0.50

Vantiv Credit ACH Transfer on 05/08/2018	1	-0.5000	35.09	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/10/2018	1	-0.5000	10.09	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/15/2018	1	-0.5000	25.01	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/16/2018	1	-0.5000	105.35	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/17/2018	1	-0.5000	83.91	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/18/2018	1	-0.5000	22.57	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/21/2018	1	-0.5000	50.23	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/22/2018	1	-0.5000	100.09	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/24/2018	1	-0.5000	50.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/25/2018	1	-0.5000	18.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/29/2018	1	-0.5000	7.15	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/30/2018	1	-0.5000	122.76	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/31/2018	1	-0.5000	15.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/01/2018	1	-0.5000	95.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/04/2018	1	-0.5000	20.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/05/2018	1	-0.5000	117.50	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/06/2018	1	-0.5000	26.01	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/07/2018	1	-0.5000	2.50	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/11/2018	1	-0.5000	7.50	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/12/2018	1	-0.5000	100.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/13/2018	1	-0.5000	50.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/14/2018	1	-0.5000	50.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/18/2018	1	-0.5000	5.58	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/19/2018	1	-0.5000	496.94	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/20/2018	1	-0.5000	20.18	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/22/2018	1	-0.5000	21.25	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/25/2018	1	-0.5000	1.01	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/26/2018	1	-0.5000	65.09	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/27/2018	1	-0.5000	50.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/29/2018	1	-0.5000	1.01	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/02/2018	1	-0.5000	3.51	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/03/2018	1	-0.5000	317.50	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/05/2018	1	-0.5000	11.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/06/2018	1	-0.5000	81.43	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/10/2018	1	-0.5000	130.09	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/11/2018	1	-0.5000	290.55	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/12/2018	1	-0.5000	252.02	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/13/2018	1	-0.5000	17.50	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/16/2018	1	-0.5000	50.00	0.0000%	-0.50
Vantiv Debit ACH Transfer on 06/08/2018	1	-0.5000	43.70	0.0000%	-0.50
Vantiv Debit ACH Transfer on 07/09/2018	1	-0.5000	25.02	0.0000%	-0.50
USD Totals:	668				-37.15

Method of Payment/Category	Description	Txn Count	Fee per Txn	Transaction Amount	Transaction % Fee	Total Fees
VISA		499				-9.42
Payments Acceptance		499				-9.42
Authorizations		167				-3.34
	Vantiv Visa Authorization	165	-0.0200	3,008.17	0.0000%	-3.30
	Vantiv Visa Authorization - Declined	2	-0.0200	355.56	0.0000%	-0.04
Deposit/Refunds		332				-6.08
	Vantiv Visa Digital Enablement Fee	165	0.0000	3,008.17	-0.0150%	-0.43
	Vantiv Visa Deposit-Settled	165	-0.0300	3,008.17	-0.0200%	-5.59
	Vantiv Visa Refund-Settled	2	-0.0300	13.95	0.0000%	-0.06
MasterCard		106				-1.94
Payments Acceptance		106				-1.94
Authorizations		38				-0.76
	Vantiv MasterCard Authorization	34	-0.0200	529.52	0.0000%	-0.68
	Vantiv MasterCard Authorization - Declined	4	-0.0200	46.53	0.0000%	-0.08
Deposit/Refunds		68				-1.18
	Vantiv MasterCard Digital Enablement Fee	34	0.0000	529.52	-0.0150%	-0.07
	Vantiv MasterCard Deposit-Settled	34	-0.0300	529.52	-0.0200%	-1.11
American Express		3				-0.06
Payments Acceptance		3				-0.06
Authorizations		3				-0.06
	Vantiv American Express Authorization	3	-0.0200	55.27	0.0000%	-0.06
Discover		9				-0.23
Payments Acceptance		9				-0.23
Authorizations		5				-0.10
	Vantiv Discover Card Authorization	4	-0.0200	54.96	0.0000%	-0.08
	Vantiv Discover Card Authorization - Declined	1	-0.0200	2.50	0.0000%	-0.02
Deposit/Refunds		4				-0.13
	Vantiv Discover Card Deposit-Settled	4	-0.0300	54.96	-0.0200%	-0.13
Not Applicable		51				-25.50
Payments Acceptance		51				-25.50
Funds Transfers		51				-25.50
	Vantiv Credit ACH Transfer on 04/16/2018	1	-0.5000	50.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/17/2018	1	-0.5000	92.23	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/23/2018	1	-0.5000	3.57	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/24/2018	1	-0.5000	33.15	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/25/2018	1	-0.5000	3.57	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/26/2018	1	-0.5000	100.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/27/2018	1	-0.5000	25.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/30/2018	1	-0.5000	1.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/01/2018	1	-0.5000	100.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/04/2018	1	-0.5000	142.85	0.0000%	-0.50

Vantiv Credit ACH Transfer on 05/08/2018	1	-0.5000	35.09	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/10/2018	1	-0.5000	10.09	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/15/2018	1	-0.5000	25.01	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/16/2018	1	-0.5000	105.35	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/17/2018	1	-0.5000	83.91	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/18/2018	1	-0.5000	22.57	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/21/2018	1	-0.5000	50.23	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/22/2018	1	-0.5000	100.09	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/24/2018	1	-0.5000	50.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/25/2018	1	-0.5000	18.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/29/2018	1	-0.5000	7.15	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/30/2018	1	-0.5000	122.76	0.0000%	-0.50
Vantiv Credit ACH Transfer on 05/31/2018	1	-0.5000	15.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/01/2018	1	-0.5000	95.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/04/2018	1	-0.5000	20.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/05/2018	1	-0.5000	117.50	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/06/2018	1	-0.5000	26.01	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/07/2018	1	-0.5000	2.50	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/11/2018	1	-0.5000	7.50	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/12/2018	1	-0.5000	100.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/13/2018	1	-0.5000	50.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/14/2018	1	-0.5000	50.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/18/2018	1	-0.5000	5.58	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/19/2018	1	-0.5000	496.94	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/20/2018	1	-0.5000	20.18	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/22/2018	1	-0.5000	21.25	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/25/2018	1	-0.5000	1.01	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/26/2018	1	-0.5000	65.09	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/27/2018	1	-0.5000	50.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 06/29/2018	1	-0.5000	1.01	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/02/2018	1	-0.5000	3.51	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/03/2018	1	-0.5000	317.50	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/05/2018	1	-0.5000	11.00	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/06/2018	1	-0.5000	81.43	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/10/2018	1	-0.5000	130.09	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/11/2018	1	-0.5000	290.55	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/12/2018	1	-0.5000	252.02	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/13/2018	1	-0.5000	17.50	0.0000%	-0.50
Vantiv Credit ACH Transfer on 07/16/2018	1	-0.5000	50.00	0.0000%	-0.50
Vantiv Debit ACH Transfer on 06/08/2018	1	-0.5000	43.70	0.0000%	-0.50
Vantiv Debit ACH Transfer on 07/09/2018	1	-0.5000	25.02	0.0000%	-0.50

USD Totals: 668 -37.15

Presenter/Category	Description	Txn Count	Fee per Txn	Transaction Amount	Transaction % Fee	Total Fees
Not Applicable		51				-25.50
Payments Acceptance		51				-25.50
Funds Transfers		51				-25.50
		51				-25.50
	Vantiv Credit ACH Transfer on 04/16/2018	1	-0.5000	50.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/17/2018	1	-0.5000	92.23	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/23/2018	1	-0.5000	3.57	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/24/2018	1	-0.5000	33.15	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/25/2018	1	-0.5000	3.57	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/26/2018	1	-0.5000	100.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/27/2018	1	-0.5000	25.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 04/30/2018	1	-0.5000	1.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/01/2018	1	-0.5000	100.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/04/2018	1	-0.5000	142.85	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/08/2018	1	-0.5000	35.09	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/10/2018	1	-0.5000	10.09	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/15/2018	1	-0.5000	25.01	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/16/2018	1	-0.5000	105.35	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/17/2018	1	-0.5000	83.91	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/18/2018	1	-0.5000	22.57	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/21/2018	1	-0.5000	50.23	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/22/2018	1	-0.5000	100.09	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/24/2018	1	-0.5000	50.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/25/2018	1	-0.5000	18.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/29/2018	1	-0.5000	7.15	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/30/2018	1	-0.5000	122.76	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 05/31/2018	1	-0.5000	15.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/01/2018	1	-0.5000	95.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/04/2018	1	-0.5000	20.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/05/2018	1	-0.5000	117.50	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/06/2018	1	-0.5000	26.01	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/07/2018	1	-0.5000	2.50	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/11/2018	1	-0.5000	7.50	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/12/2018	1	-0.5000	100.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/13/2018	1	-0.5000	50.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/14/2018	1	-0.5000	50.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/18/2018	1	-0.5000	5.58	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/19/2018	1	-0.5000	496.94	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/20/2018	1	-0.5000	20.18	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/22/2018	1	-0.5000	21.25	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/25/2018	1	-0.5000	1.01	0.0000%	-0.50

	Vantiv Credit ACH Transfer on 06/26/2018	1	-0.5000	65.09	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/27/2018	1	-0.5000	50.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 06/29/2018	1	-0.5000	1.01	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 07/02/2018	1	-0.5000	3.51	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 07/03/2018	1	-0.5000	317.50	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 07/05/2018	1	-0.5000	11.00	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 07/06/2018	1	-0.5000	81.43	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 07/10/2018	1	-0.5000	130.09	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 07/11/2018	1	-0.5000	290.55	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 07/12/2018	1	-0.5000	252.02	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 07/13/2018	1	-0.5000	17.50	0.0000%	-0.50
	Vantiv Credit ACH Transfer on 07/16/2018	1	-0.5000	50.00	0.0000%	-0.50
	Vantiv Debit ACH Transfer on 06/08/2018	1	-0.5000	43.70	0.0000%	-0.50
	Vantiv Debit ACH Transfer on 07/09/2018	1	-0.5000	25.02	0.0000%	-0.50
actblue		617				-11.65
Payments Acceptance		617				-11.65
Authorizations		213				-4.26
		167				-3.34
	Vantiv Visa Authorization	165	-0.0200	3,008.17	0.0000%	-3.30
	Vantiv Visa Authorization - Declined	2	-0.0200	355.56	0.0000%	-0.04
		38				-0.76
	Vantiv MasterCard Authorization	34	-0.0200	529.52	0.0000%	-0.68
	Vantiv MasterCard Authorization - Declined	4	-0.0200	46.53	0.0000%	-0.08
		3				-0.06
	Vantiv American Express Authorization	3	-0.0200	55.27	0.0000%	-0.06
		5				-0.10
	Vantiv Discover Card Authorization	4	-0.0200	54.96	0.0000%	-0.08
	Vantiv Discover Card Authorization - Declined	1	-0.0200	2.50	0.0000%	-0.02
Deposit/Refunds		404				-7.39
		332				-6.08
	Vantiv Visa Digital Enablement Fee	165	0.0000	3,008.17	-0.0150%	-0.43
	Vantiv Visa Deposit-Settled	165	-0.0300	3,008.17	-0.0200%	-5.59
	Vantiv Visa Refund-Settled	2	-0.0300	13.95	0.0000%	-0.06
		68				-1.18
	Vantiv MasterCard Digital Enablement Fee	34	0.0000	529.52	-0.0150%	-0.07
	Vantiv MasterCard Deposit-Settled	34	-0.0300	529.52	-0.0200%	-1.11
		4				-0.13
	Vantiv Discover Card Deposit-Settled	4	-0.0300	54.96	-0.0200%	-0.13
USD Totals:		668				-37.15

### Passthrough Fees by Category

Category/Method of Payment	Description	Txn Count	Fee per Txn	Transaction Amount	Transaction % Fee	Total Fees
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Assessments  
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-12.70

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VISA		337					-6.91
	Visa Credit Voucher Data Processing Fee CREDIT	1	-0.0195	12.50	0.0000%		-0.02
	Visa Credit Voucher Data Processing Fee DEBIT	1	-0.0155	1.45	0.0000%		-0.02
	Visa Base II Fee	167	-0.0020	3,022.12	0.0000%		-0.22
	VI Fixed Acquirer Network Fee - Customer Not Present Tier 2	3	0.0000	1,869.40	-0.1500%		-2.81
	Visa Acquirer Card Service Fee - CREDIT	141	0.0000	2,733.98	-0.1300%		-3.50
	Visa Assessment	24	0.0000	274.19	-0.1300%		-0.34
MasterCard		143					-5.39
	MC Monthly Location Fee	3	-1.2500	479.49	0.0000%		-3.75
	MasterCard Network Access and Brand Usage - Authorization	38	-0.0195	576.05	0.0000%		-0.76
	MasterCard Settlement Fee	34	-0.0025	529.52	0.0000%		-0.03
	MasterCard Assessment	34	0.0000	529.52	-0.1300%		-0.67
	MasterCard Acquirer Assessment	34	0.0000	529.52	-0.0362%		-0.18
American Express		6					-0.26
	American Express Non Swiped Fee	3	0.0000	55.27	-0.3000%		-0.17
	American Express Network Fee	3	0.0000	55.27	-0.1500%		-0.09
Discover		8					-0.14
	Discover Data Usage Charge	4	-0.0195	54.96	0.0000%		-0.08
	Discover Assessment	4	0.0000	54.96	-0.1300%		-0.06
Authorizations		210					-3.64
VISA		167					-3.26
	Visa Authorization Processing Fee CREDIT	142	-0.0195	2,989.54	0.0000%		-2.83
	Visa Authorization Processing Fee DEBIT	25	-0.0155	374.19	0.0000%		-0.43
MasterCard		38					-0.38
	MasterCard Authorization AVS Card Not Present	38	-0.0100	576.05	0.0000%		-0.38
Discover		5					0.00
	Discover Authorization Processing Fee	5	-0.0025	57.46	0.0000%		0.00
Credit Interchange		178					-93.24
VISA		141					-76.24
	VI Commercial Business Tier 4 - Card Not Present	1	-0.2000	25.00	-2.7000%		-0.88
	VI Commercial Business Tier 3 - Card Not Present	1	-0.2000	50.00	-2.6000%		-1.50
	VI Consumer CPS Signature Preferred Credit	76	-0.1000	1,602.74	-2.4000%		-46.30
	VI Infinite Card Not Present	10	-0.1000	138.93	-2.4000%		-4.36
	VI Consumer CPS Rewards 2	47	-0.1000	845.16	-1.9500%		-21.30
	VI Consumer CPS ECommerce Basic Credit	6	-0.1000	72.15	-1.8000%		-1.90
MasterCard		30					-14.30
	MC Commercial Business Level 3 Data Rate I	1	-0.1000	5.00	-2.8600%		-0.25
	MC Commercial Data Rate I	1	-0.1000	25.00	-2.6500%		-0.77
	MC Consumer Merit 1 World Elite	14	-0.1000	296.74	-2.5000%		-8.88
	MC Consumer Merit 1 World High Value	2	-0.1000	8.58	-2.5000%		-0.42
	MC Consumer Merit 1 World	9	-0.1000	84.42	-2.0500%		-2.68
	MC Consumer Merit 1 Enhanced	1	-0.1000	1.00	-2.0400%		-0.12



	MC Consumer Merit 1	2	-0.1000	51.25	-1.8900%	-1.18
American Express		3				-1.20
	AX Credit Service Tier 1 Deposit	3	-0.1000	55.27	-1.6000%	-1.20
Discover		4				-1.50
	DI Consumer Prime Submission Level E-Commerce Premium Plus	1	-0.1000	2.50	-2.3500%	-0.16
	DI Consumer Prime Submission Level E-Commerce Premium	1	-0.1000	1.45	-2.0000%	-0.13
	DI Consumer Prime Submission Level E-Commerce Rewards	2	-0.1000	51.01	-1.9700%	-1.21
Debit Interchange		28				-6.42
VISA		24				-5.55
	VI U.S. Regulated Debit	21	-0.2200	258.93	-0.0500%	-4.83
	VI Consumer CPS ECommerce Basic Debit	3	-0.1500	15.26	-1.6500%	-0.72
MasterCard		4				-0.87
	MC Regulated Debit Plus Fraud Adjustment	2	-0.2200	52.50	-0.0500%	-0.48
	MC Consumer Merit 1 Debit	2	-0.1500	5.03	-1.6000%	-0.39
Refund Interchange		1				0.26
VISA		1				0.26
	VI Consumer Credit Voucher MOTO or ECommerce Credit - Refund	1	0.0000	12.50	2.0500%	0.26
USD Totals:		911				-115.74

#### Passthrough Fees by Payment Method

Method of Payment/Category	Description	Txn Count	Fee per Txn	Transaction Amount	Transaction % Fee	Total Fees
VISA		670				-91.70
Assessments		337				-6.91
	Visa Credit Voucher Data Processing Fee CREDIT	1	-0.0195	12.50	0.0000%	-0.02
	Visa Credit Voucher Data Processing Fee DEBIT	1	-0.0155	1.45	0.0000%	-0.02
	Visa Base II Fee	167	-0.0020	3,022.12	0.0000%	-0.22
	VI Fixed Acquirer Network Fee - Customer Not Present Tier 2	3	0.0000	1,869.40	-0.1500%	-2.81
	Visa Acquirer Card Service Fee - CREDIT	141	0.0000	2,733.98	-0.1300%	-3.50
	Visa Assessment	24	0.0000	274.19	-0.1300%	-0.34
Authorizations		167				-3.26
	Visa Authorization Processing Fee CREDIT	142	-0.0195	2,989.54	0.0000%	-2.83
	Visa Authorization Processing Fee DEBIT	25	-0.0155	374.19	0.0000%	-0.43
Credit Interchange		141				-76.24
	VI Commercial Business Tier 4 - Card Not Present	1	-0.2000	25.00	-2.7000%	-0.88
	VI Commercial Business Tier 3 - Card Not Present	1	-0.2000	50.00	-2.6000%	-1.50
	VI Consumer CPS Signature Preferred Credit	76	-0.1000	1,602.74	-2.4000%	-46.30
	VI Infinite Card Not Present	10	-0.1000	138.93	-2.4000%	-4.36
	VI Consumer CPS Rewards 2	47	-0.1000	845.16	-1.9500%	-21.30
	VI Consumer CPS ECommerce Basic Credit	6	-0.1000	72.15	-1.8000%	-1.90

Debit Interchange		24					-5.55
	VI U.S. Regulated Debit	21	-0.2200	258.93	-0.0500%		-4.83
	VI Consumer CPS ECommerce Basic Debit	3	-0.1500	15.26	-1.6500%		-0.72
Refund Interchange		1					0.26
	VI Consumer Credit Voucher MOTO or ECommerce Credit - Refund	1	0.0000	12.50	2.0500%		0.26
MasterCard		215					-20.94
Assessments		143					-5.39
	MC Monthly Location Fee	3	-1.2500	479.49	0.0000%		-3.75
	MasterCard Network Access and Brand Usage - Authorization	38	-0.0195	576.05	0.0000%		-0.76
	MasterCard Settlement Fee	34	-0.0025	529.52	0.0000%		-0.03
	MasterCard Assessment	34	0.0000	529.52	-0.1300%		-0.67
	MasterCard Acquirer Assessment	34	0.0000	529.52	-0.0362%		-0.18
Authorizations		38					-0.38
	MasterCard Authorization AVS Card Not Present	38	-0.0100	576.05	0.0000%		-0.38
Credit Interchange		30					-14.30
	MC Commercial Business Level 3 Data Rate I	1	-0.1000	5.00	-2.8600%		-0.25
	MC Commercial Data Rate I	1	-0.1000	25.00	-2.6500%		-0.77
	MC Consumer Merit 1 World Elite	14	-0.1000	296.74	-2.5000%		-8.88
	MC Consumer Merit 1 World High Value	2	-0.1000	8.58	-2.5000%		-0.42
	MC Consumer Merit 1 World	9	-0.1000	84.42	-2.0500%		-2.68
	MC Consumer Merit 1 Enhanced	1	-0.1000	1.00	-2.0400%		-0.12
	MC Consumer Merit 1	2	-0.1000	51.25	-1.8900%		-1.18
Debit Interchange		4					-0.87
	MC Regulated Debit Plus Fraud Adjustment	2	-0.2200	52.50	-0.0500%		-0.48
	MC Consumer Merit 1 Debit	2	-0.1500	5.03	-1.6000%		-0.39
American Express		9					-1.46
Assessments		6					-0.26
	American Express Non Swiped Fee	3	0.0000	55.27	-0.3000%		-0.17
	American Express Network Fee	3	0.0000	55.27	-0.1500%		-0.09
Credit Interchange		3					-1.20
	AX Credit Service Tier 1 Deposit	3	-0.1000	55.27	-1.6000%		-1.20
Discover		17					-1.64
Assessments		8					-0.14
	Discover Data Usage Charge	4	-0.0195	54.96	0.0000%		-0.08
	Discover Assessment	4	0.0000	54.96	-0.1300%		-0.06
Authorizations		5					0.00
	Discover Authorization Processing Fee	5	-0.0025	57.46	0.0000%		0.00
Credit Interchange		4					-1.50
	DI Consumer Prime Submission Level E-Commerce Premium Plus	1	-0.1000	2.50	-2.3500%		-0.16
	DI Consumer Prime Submission Level E-Commerce Premium	1	-0.1000	1.45	-2.0000%		-0.13

DI Consumer Prime Submission Level E-Commerce Rewards	2	-0.1000	51.01	-1.9700%	-1.21
USD Totals:	911				-115.74

Passthrough Fees by Presenter

Presenter/Category	Description	Txn Count	Fee per Txn	Transaction Amount	Transaction % Fee	Total Fees
Not Applicable		6				-6.56
Assessments		6				-6.56
		3				-2.81
	VI Fixed Acquirer Network Fee - Customer Not Present Tier 2	3	0.0000	1,869.40	-0.1500%	-2.81
		3				-3.75
	MC Monthly Location Fee	3	-1.2500	479.49	0.0000%	-3.75
actblue		905				-109.18
Assessments		488				-6.14
		334				-4.10
	Visa Credit Voucher Data Processing Fee CREDIT	1	-0.0195	12.50	0.0000%	-0.02
	Visa Credit Voucher Data Processing Fee DEBIT	1	-0.0155	1.45	0.0000%	-0.02
	Visa Base II Fee	167	-0.0020	3,022.12	0.0000%	-0.22
	Visa Acquirer Card Service Fee - CREDIT	141	0.0000	2,733.98	-0.1300%	-3.50
	Visa Assessment	24	0.0000	274.19	-0.1300%	-0.34
		140				-1.64
	MasterCard Network Access and Brand Usage - Authorization	38	-0.0195	576.05	0.0000%	-0.76
	MasterCard Settlement Fee	34	-0.0025	529.52	0.0000%	-0.03
	MasterCard Assessment	34	0.0000	529.52	-0.1300%	-0.67
	MasterCard Acquirer Assessment	34	0.0000	529.52	-0.0362%	-0.18
		6				-0.26
	American Express Non Swiped Fee	3	0.0000	55.27	-0.3000%	-0.17
	American Express Network Fee	3	0.0000	55.27	-0.1500%	-0.09
		8				-0.14
	Discover Data Usage Charge	4	-0.0195	54.96	0.0000%	-0.08
	Discover Assessment	4	0.0000	54.96	-0.1300%	-0.06
Authorizations		210				-3.64
		167				-3.26
	Visa Authorization Processing Fee CREDIT	142	-0.0195	2,989.54	0.0000%	-2.83
	Visa Authorization Processing Fee DEBIT	25	-0.0155	374.19	0.0000%	-0.43
		38				-0.38
	MasterCard Authorization AVS Card Not Present	38	-0.0100	576.05	0.0000%	-0.38
		5				0.00
	Discover Authorization Processing Fee	5	-0.0025	57.46	0.0000%	0.00
Credit Interchange		178				-93.24
		141				-76.24
	VI Commercial Business Tier 4 - Card Not Present	1	-0.2000		0.0000%	-0.88

	VI Commercial Business Tier 3 - Card Not Present	1	-0.2000	50.00	-2.6000%	-1.50
	VI Consumer CPS Signature Preferred Credit	76	-0.1000	1,602.74	-2.4000%	-46.30
	VI Infinite Card Not Present	10	-0.1000	138.93	-2.4000%	-4.36
	VI Consumer CPS Rewards 2	47	-0.1000	845.16	-1.9500%	-21.30
	VI Consumer CPS ECommerce Basic Credit	6	-0.1000	72.15	-1.8000%	-1.90
		30				-14.30
	MC Commercial Business Level 3 Data Rate I	1	-0.1000	5.00	-2.8600%	-0.25
	MC Commercial Data Rate I	1	-0.1000	25.00	-2.6500%	-0.77
	MC Consumer Merit 1 World Elite	14	-0.1000	296.74	-2.5000%	-8.88
	MC Consumer Merit 1 World High Value	2	-0.1000	8.58	-2.5000%	-0.42
	MC Consumer Merit 1 World	9	-0.1000	84.42	-2.0500%	-2.68
	MC Consumer Merit 1 Enhanced	1	-0.1000	1.00	-2.0400%	-0.12
	MC Consumer Merit 1	2	-0.1000	51.25	-1.8900%	-1.18
		3				-1.20
	AX Credit Service Tier 1 Deposit	3	-0.1000	55.27	-1.6000%	-1.20
		4				-1.50
	DI Consumer Prime Submission Level E-Commerce Premium Plus	1	-0.1000	2.50	-2.3500%	-0.16
	DI Consumer Prime Submission Level E-Commerce Premium	1	-0.1000	1.45	-2.0000%	-0.13
	DI Consumer Prime Submission Level E-Commerce Rewards	2	-0.1000	51.01	-1.9700%	-1.21
Debit Interchange		28				-6.42
		24				-5.55
	VI U.S. Regulated Debit	21	-0.2200	258.93	-0.0500%	-4.83
	VI Consumer CPS ECommerce Basic Debit	3	-0.1500	15.26	-1.6500%	-0.72
		4				-0.87
	MC Regulated Debit Plus Fraud Adjustment	2	-0.2200	52.50	-0.0500%	-0.48
	MC Consumer Merit 1 Debit	2	-0.1500	5.03	-1.6000%	-0.39
Refund Interchange		1				0.26
		1				0.26
	VI Consumer Credit Voucher MOTO or ECommerce Credit - Refund	1	0.0000	12.50	2.0500%	0.26
USD Totals:		911				-115.74



## State of Washington

### PUBLIC DISCLOSURE COMMISSION

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February 16, 2021

Sent Electronically to Emily Randall and Abbott Taylor, 2018 Campaign Treasurer

Subject: PDC Audit Letter, 2018 Emily Randall for Senate Campaign; PDC Audit No. 20-05

Dear Senator Randall and Mr. Taylor:

This letter is a follow-up to the email communication PDC staff recently had with you and your 2018 Emily Randall for Senate Campaign (Campaign) notifying you that your Campaign had been selected for audit and that you would be receiving an email with an attached letter from staff shortly about the upcoming audit. Pursuant to RCW 42.17A.105 and .110, the Public Disclosure Commission (PDC) has a mandate to conduct audits of candidates, committees and other filing entities. Based on that authority, PDC staff has in the past conducted audits of candidates and political committees, lobbyist and lobbyist employers, and state agency lobbying activities in accordance with chapter 42.17 RCW.

Audits provide the PDC with an opportunity to: (1) determine the degree of compliance with the candidate campaign finance reporting requirements; (2) enhance and strengthen the public's confidence in the campaign contribution and expenditure information being disclosed by filers; (3) identify problem areas in reporting campaign activities that suggest a need to revise PDC advice being given or the information that is listed in candidate instructions on the PDC website and included in our online manuals; and (4) identify needed changes in the law or rules for reporting.

The PDC began conducting several limited scope audits in December 2020, after staff identified four 2018 Legislative Districts elections for State Senate, consisting of eight candidates selected for this limited-scope audit. The criteria used in selecting the 2018 Legislative candidates for audit was both candidates: (1) appeared on the November 6, 2018 general election ballot; (2) were in a closely contested election; (3) had significant contribution and expenditure activities; and (4) did not file as a candidate for the 2020 election cycle.

Based on the criteria listed above, this race was selected for a limited-scope audit. For your information, the majority of the audit work involves PDC staff reviewing information disclosed by your 2018 Campaign on Monetary Contributions reports (C-3 reports) and Summary, Full Campaign Contributions and Expenditures Reports (C-4 reports). The audit also includes queries of the PDC contribution and expenditure databases, and confirmation of select contributor and vendor information.

PDC staff is also requesting copies of the "books of account" maintained by the Campaign for select expenditures, and that documentation includes copies of invoices, receipts, cancelled checks, emails and other memoranda for the following expenditures:

**Audit Exhibit #1**

**Page 57 of 59**

1. Two expenditures were made to Moxie Media, Inc. totaling \$153,525 for two Comcast Cable TV buys that included a \$91,275 expenditure made on October 19, 2018, and a \$62,250 expenditure made on October 5, 2018.
2. Three expenditures were made to Moxie Media, Inc. totaling \$63,890 for “Online Ads” that were ran through DS Political and included a \$23,000 expenditure made on October 1, 2018; a \$27,940 expenditure made on October 22, 2018; and a \$12,650 expenditure made on October 26, 2018.
3. Three expenditures were made to Moxie Media, Inc. totaling \$34,046 for “Production of Mailers” that were ran through Capitol City Press and included a \$17,742 expenditure made on July 12, 2018; a \$9,654 expenditure made on October 29, 2018; and a \$6,650 expenditure made on July 9, 2018.
4. Two expenditures were made to Moxie Media, Inc. totaling \$24,150 for two “Connected TV Ad” buys made through RhythmOne that included a \$17,250 expenditure made on October 19, 2018, and a \$62,250 expenditure made on October 5, 2018.
5. Two expenditures were made to Capitol City Press totaling \$14,141 that included a \$7,240 expenditure made on July 12, 2018, for “Postage for 38,142 mailers”, and a \$6,901 expenditure made on October 29, 2018, for “Postage for 27,130 mailers.”
6. Three expenditures totaling \$500 were made to Facebook, Inc. that included expenditures made on July 31, 2018 totaling \$90.50 for Online Ads that ran 7/27 to 7/30/ 2018; on August 6, 2018 totaling \$250 for Online Ads that ran 7/29-8/4/2018; and August 31, 2018 totaling \$159.57 for Online Ads that ran 8/2 – 8/7/2018.
7. The vendors that comprised the \$646.75 worth of expenditures made on June 1, 2018 and listed as “Expenses of \$50 or less.”

Staff is also requesting that each Campaign provide a response concerning 2018 general campaign practices, internal campaign compliance controls, and procedures for processing and recording contribution and expenditure activities, including orders placed and in-kind contributions.

The questions and Campaign practices for which a response is being requested, includes the following:

1. Explain the 2018 Campaign contribution process from receipt of a contribution, to entering the contributor information into ORCA, the name of the person depositing the contributions, how often were contributions deposited, and the filing of the C-3 report. In addition, if online contributions were received by the Campaign, please explain those contributions were processed as well.
2. Explain the 2018 Campaign expenditure process including the placing of the orders for political advertisements, identifying who placed the orders, to making the expenditure, picking up the goods and/or services provided, and the disclosing of the expenditure on the C-4 report. In addition, explain the process for disclosing orders placed.
3. Describe the process for reviewing and filing the C-3 and C-4 reports, the communication that occurs between the candidate and the Treasurer concerning the contribution and expenditure information being disclosed. In addition, does the candidate review the reports either before or after they have been filed.

4. Describe how the Campaign records are maintained for all contribution and expenditure activities, and what those records include.
5. Who was responsible for the Campaign records, did the Campaign make the books of account available during the public inspection period, was an inspection requested, and what documents were made available during the inspection?
6. Did the candidate or any Campaign officers or volunteers received reimbursements during the 2018? If yes, please describe how the Campaign handled the reimbursements, the documentation that was required for reimbursement, and how those records were maintained.

Please provide copies of the requested expenditure documentation, and a response to the PDC questions and issues regarding the various campaign practices no later than **March 2, 2021**. If you need additional time, please do not hesitate to contact Kurt Young, PDC Compliance Officer.

PDC staff understand the numerous constraints placed upon individuals who run for public office as candidates and elected officials. Staff also appreciates the hard work, time, effort and diligence on the part of all those individuals involved, including campaign workers, volunteers, and in particular the campaign treasurers. The PDC appreciates your cooperation in conducting this audit.

If you or your Treasurer has any questions, please contact Mr. Young at (360) 664-8854, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

Endorsed by,

/s  
Electronically Signed Kurt Young  
Compliance Officer

/s  
Electronically Signed Peter Lavalley,  
PDC Executive Director



Emily Randall for Senate  
PO Box 1883  
Port Orchard, WA 98366

February 25, 2021

Public Disclosure Commission  
PO Box 40908  
Olympia, WA 98504

RE: PDC Audit No. 20-05

To Whom It May Concern:

This letter is in response to the PDC Audit Letter sent on February 16, 2021, regarding Emily Randall for Senate's 2018 campaign.

Attached with this letter are scans of all expense details requested. Please note that the payments to Moxie Media for RhythmOne were for \$17,250 on 10/22/2018 and \$6,900 on 10/26/2018, which differs from the expenses cited in the Audit Letter.

Additionally, the \$646.75 of unitemized expenditures were for the entire 6/1/2018-7/16/2018 C4 filing period, not just on 6/1/2018. All of those expenditures are supported by the attached files, except for the mid-July Vantiv and ActBlue payments, which were deducted from credit card deposits and do not show up on the bank statement as separate charges.

Specific campaign practices and internal controls are explained below.

1. Contributions received at the campaign PO box or at campaign events are collected and sent to or dropped off with the treasurer, and are then deposited within the required five business days. The campaign uses NGP for campaign reporting, and the treasurer enters the information in NGP and prepares the C3 before making the deposit. Online contributions are combined into a weekly C3 for the prior week's online donations. Information is directly received from the donor by NGP or imported by the treasurer, and all contributions are reported on a C3.
2. Campaign expenditures are proposed by the campaign team, and sent to the consultants for budgeting and fulfillment. The consultants work with the subvendors to determine appropriate quantities, advertising methods, and/or run dates, and the candidate approves the expenditure before it moves forward. Invoices are either received by the campaign and forwarded to the treasurer for payment, or received by the treasurer and forwarded to the candidate for approval before paying. All expenses are entered into NGP when paid and reported with required descriptions on the next C4. Prior to filing the C4, the treasurer sends an email to the candidate, relevant campaign staff, and



campaign consultants asking for any outstanding bills or orders, and any over the debt reporting threshold are added to the C4 as debts.

3. All C3 and C4 reports prepared by the treasurer are emailed to the candidate and relevant campaign members prior to filing for review and approval. The candidate almost always approves before filing, but some reports with short turnaround times are filed when due, with or without prior approval. Any changes or additions are incorporated into the report, either before filing or via amendment once known.
4. Campaign contribution and expenditure information is stored in the NGP database, as well as in QuickBooks as part of the treasurer's books. Additionally, physical copies of invoices, check stubs, payroll tax forms, and PDC reports are kept for the IRS-required seven years.
5. The campaign treasurer is responsible for the campaign records. Records were made available during the 2018 inspection periods, but no requests were received.
6. The candidate and campaign staff did receive reimbursements during the 2018 campaign. All reimbursements were accompanied by a spreadsheet listing the relevant information, as well as scans or photos of the receipts. In the attached files, there are four examples of these sheets, two for the candidate and two for the campaign manager (please note that the May files say "In-Kind" in the title but are actually for reimbursements).

If you have any questions about any of the above, please feel free to reach out for more information.

Sincerely,



Emily Randall  
Candidate



Abbot Taylor  
Treasurer