



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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April 15, 2021

Sent Electronically to Jessa Lewis and Jay Petterson, Treasurer

Subject: Audit Report – Jessa Lewis 2018 Senate Campaign

Dear Ms. Lewis and Mr. Petterson:

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

- The 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@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Electronically Signed Erick Agina
PDC Compliance Officer

s/ _____
Electronically Signed Peter Lavallee
PDC Executive Director



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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17A

PDC Audit No. 20-08

2018 Jessa Lewis Senate Campaign

Audit Report

I.

Audit 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 the findings of reviews conducted of 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 the PDC's advice and guidance given to filers, to recommend or initiate changes in the law, or to adopt or revise the rules for reporting, and if necessary, for enforcement. The Commission believes that the primary purposes of conducting audits are to:
 1. Verify that the information disclosed on candidate and political committee campaign finance reports is timely and accurate in accordance with RCW 42.17A.
 2. Determine whether candidates and political committees are in substantial compliance with the law, 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 candidates for limited-scope audits to be conducted based on the audit criteria established by staff. The audit criteria included that both 2018 Senate candidates in each Legislative District were in a contested 2018 general election, with both candidates disclosing significant contribution and expenditure activities, and the election generated significant public interest.
- Once the current Senate audits have been completed, PDC staff will be selecting eight candidates for State Representative from the 2020 election cycle to conduct limited-scope audits based on the same audit criteria listed above.

II.

Audit Background

- On February 26, 2018, Jessa Lewis filed a Candidate Registration (C-1 report) declaring her candidacy for election to the office of State Senator in the 6th Legislative District in 2018, selecting the Full Reporting Option and listing Jay Petterson as Ministerial Treasurer and Josie Olsen as Deputy Treasurer.
- On March 10, 2021, the PDC staff sent an email to Jessa Lewis and Jay Pettersen, Treasurer for the 2018 Friends of Jessa Lewis Senate Campaign, and attached a letter notifying them that staff was conducting audits of four 2018 contested Senate races. The letter stated staff was conducting a limited-scope audit of the two 2018 candidates that ran for State Senator in the 6th Legislative District, which included Ms. Jesse Lewis. The letter requested documentation maintained by the Campaign for selected expenditures made during the 2018 election cycle, in addition to a brief narrative concerning 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 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 Campaign's 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.
- 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 requirement under RCW 42.17A.235 and .240.

III. Audit Findings

- The 2018 Friends of Jessa Lewis (Campaign) disclosed \$298,776.01 in total contributions received and \$298,776.01 in total expenditures made during the 2018 election cycle, with \$0.00 as cash on hand balance through December 31, 2018 on the “Final C-4 report” timely filed on January 31, 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 January 15 through December 31, 2018, that included 1,012 separate monetary and in-kind contributions totaling \$298,776.01. The \$298,776.01 in total monetary and in-kind contributions received included anonymous and small non-itemized contributions as disclosed on C-3 reports.
- The Campaign’s three largest contributors in 2018 included the following political party committees and caucus political committees:
 1. Washington Senate Democratic Campaign (WSDC): A total of \$74,000 was received from WSDC. \$11,000 and \$18,000 in in-kind contributions for Research Consulting and Polling were received on August 31, 2018 and September 10, 2018, respectively, and two cash contributions of \$40,000 and \$5,000 were received on October 10 and October 29, 2018, respectively.
 2. Washington State Democrats (WSD): A total of \$58,140 (\$10,929 in cash donation and \$47,211 in in-kind donation) was received from WSD in the 2018 election year.
 3. The Spokane County Democratic Central Committee: A total of \$8,700.62 in monetary contribution was received from the Spokane County Democratic Central Committee.
- The Campaign disclosed receiving anonymous contributions totaling \$225 in the 2018 election cycle.
- Based on the number of C-3 reports filed by the Campaign, staff reviewed random C-3 reports 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 in the preceding seven calendar days. The 2018 C-3 reports filed by the Campaign and reviewed by staff included the following:

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
3/1/18 – 3/2/18	3/5/2018	Three-page C-3 report depicting 17 itemized contributions ranging from \$27 to \$250 and 13 small contributions \$25 or less not itemized totaling \$271.	\$1,552.00	4/9/2018	0
5/29/2018	5/29/2018	One-page C-3 report depicting five itemized contributions ranging from \$30 to \$1,000.	\$1,662.00	6/4/2018	0
6/1/18 – 6/4/18	6/4/2018	Two-page C-3 report depicting seven contributions rec'd from individuals ranging from \$6 to 100 and three small donations of \$25 or less totaling \$70.	\$442.00	6/9/2018	0
6/11/2018	6/11/2018	Six total contributions from five individuals ranging from \$20 to \$100 (totaling \$380); one contribution of \$500 from a PAC (UA 44 PAC Fund); and one small contributions of \$25 or less not itemized for \$10.	\$880.00	6/18/2018	0
6/21/18 – 6/22/18	6/25/2018	Three total contributions from four individuals totaling \$405.00.	\$405.00	7/1/2018	0
6/26/18 – 6/28/18	6/28/2018	Nine total contributions received from individuals ranging from \$6 to for \$50 and three small contributions \$25 or less not itemized totaling \$26.	\$261.00	7/1/2018	0
6/29/18 – 7/04/18	7/04/2018	Five-page C-3 report depicting 49 itemized contributions ranging from \$6 to \$375 from individuals and 13 small contributions \$25 or less not itemized totaling \$242.	\$3,088.00	7/8/2018	0
7/5/18 – 7/11/18	7/11/2018	Four contributions received from individuals ranging from \$27 to \$50 and one small contributions \$25 or less not itemized totaling \$10.	\$162.00	7/16/2018	0
7/12/18 -7/16/2018	7/16/2018	Four contributions from individuals ranging from \$10 to \$250 and one small contributions \$25 or less not itemized totaling \$10.	\$770.00	7/17/2018	0

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
7/13/2018	7/13/2018	Two-page C-3 report depicting seven contributions received from three individuals and four PACs; and one contribution of small contributions \$25 or less not itemized totaling \$20.	\$2,120.00	7/16/2018	0
7/19/2018	7/19/2018	Two-page C-3 report depicting five contributions from individuals for \$50 each; four contributions from PACs (Children's Campaign Fund, NARAL Pro-Choice Washington PAC, Washington Federation of State and Washington State Building; and one small contribution of \$25 or less not itemized totaling \$10.	\$2,760.00	7/23/2018	0
7/23/18 – 7/27/18	7/27/18	Two-page C-3 report depicting 15 individual contributions of \$10 to \$200, including 6 small contributions of \$25 or less not itemized totaling \$130.	\$966.40	7/30/2018	0
7/31/18 - 8/4/18	8/4/2018	Two-page C-3 report depicting 16 contributions from individuals ranging from \$6 to \$204, including five small contributions of \$25 or less not itemized totaling \$90.	\$958.00	8/6/2018	0
8/8/18 – 8/10/18	8/13/2018	Two-page C-3 report depicting 13 contributions from individuals ranging from \$50 to \$250, including 13 small contributions of \$25 or less not itemized totaling \$230.00.	\$1,280.00	8/13//2018	0
8/13/18 – 8/16/18	8/17/18	Four contributions from individuals ranging from \$26 to \$250 and 12 small contributions of \$25 or less not itemized totaling \$250.	\$826.00	8/20/18	0
8/20/18 – 8/24/18	8/24/18	Six total contributions from individuals ranging from \$27 to \$500 and 5 small contributions of \$25 or less not itemized totaling \$110.	\$1,217.00	8/27/2018	0
8/26/18 – 8/31/18	8/31/18	Three-page C-3 report depicting 19 contributions from individuals ranging from \$6 to \$250, including 16 small contributions of \$25 or less not itemized totaling \$211.00.	\$1,384.00	9/4/2018	0

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
8/27/2018	8/27/18	One-page C-3 report depicting two contributions from individuals for \$100 each and three contributions from PACs (Children's Campaign Fund (\$750), International Union (\$500) and Washington Conservation Voters (\$1,000)).	\$2,450.00	8/27/2018	0
9/1/18 – 9/5/18	9/5/18	Two-page C-3 report depicting eight contributions from individuals ranging from \$6 to \$1,000 and one contribution of \$25 or less not itemized totaling \$10.	\$1,376.00	9/9/2018	0
9/6/18 – 9/8/18	9/10/18	Five total contributions from individuals ranging from \$10 to \$1,000 and one contribution of small contributions of \$25 or less not itemized totaling \$25.	\$1,685.00	9/10/2018	0
9/7/2018	9/10/18	Two-page C-3 report depicting a total of seven contributions – one from a PAC (Spokane County Democratic and six from individuals ranging from \$30 to \$250.	\$2,680.00	9/10/2018	0
9/9/18 – 9/13/18	9/14/18	Two-page C-3 report depicting 10 contributions from individuals ranging from \$25 to \$500, including two small contributions \$25 or less not itemized totaling \$20.	\$2,095.00	9/17/2018	0
9/12/18 – 9/14/18	9/14/18	Five contributions from five PACs (Kennedy Fund for \$1,000, United Food & AMP Commercial for \$1,000, WA State Committee Political for \$250 and Win with Women for \$500), including one small contribution of \$25 or less not itemized totaling \$25.	\$3,175.00	9/17/2018	0
9/14/18 – 9/15/18	9/17/18	Five total contributions form individuals ranging from \$100 to \$1,000, including two small contributions \$25 or less not itemized totaling \$20.00.	\$1,970.00	9/17/2018	0

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
9/21/18 – 9/22/18	9/24/18	15 total contributions from nine individuals and five contributions from PACs (Washington State Building (\$1,000), Washington Machinists Council (\$1,000), Tulalip Tribes of Washington (\$1,000), Win with Women (\$500) and IBEW Local 77 PAC (\$500)).	\$6,085.00	9/30/2018	0
9/23/18 – 9/28/18	9/28/18	Three-page C-3 report depicting 22 contributions from individuals ranging from \$6 to \$500, including six small contributions \$25 or less not itemized totaling \$101.	\$2,794.00	9/30/18	0
9/29/18 – 10/5/18	10/5/18	Three-page C-3 report depicting 39 contributions from individuals ranging from \$6 to \$1,000, including 21 small contributions \$25 or less not itemized totaling \$305.	\$5,083.00	10/7/2018	0
10/2/18 Rpt# 100862976	10/2/2018	Four contributions received. Three from PACs (AFT Washington COPE State (\$1,000), International Brotherhood (\$1,000) and Shipyard Laborers (\$1,000)) and one contribution from an individual for \$50.	\$3,050.00	10/7/2018	0
10/5/2018	10/6/2018	Two-page C-3 report depicting a total of 10 contributions received. One from an individual for \$125 and the rest (9) from PACs (ATU Legislative Council WA (\$1,000), UFCW 21 PAC (\$1,000), Spokane County Democratic (\$2,400), ILWU Local 19 (\$200), International Union (\$500), National Women's Political (\$300), Puget Sound District Council (\$300), WA State National Organization (\$250) and Washington Teamsters (\$500)).	\$6,575.00	10/7/2018	0
10/7/18 – 10/11/18	10/11/2018	Three-page C-3 report depicting contributions from 21 individuals ranging from \$10 to \$800 and six small contributions of \$25 or less not itemized totaling \$120.	\$2,782.00	10/15/2018	0

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
10/10/18 – 10/11/18	10/15/2018	Three-page C-3 report depicting contributions from 17 individuals ranging from \$30 to \$1,000; five contributions from PACs and Caucus Committee (Washington State Progressive (\$550), Washington Senate Democratic Campaign (\$40,000), Retired Public Employees (\$500), Planned Parenthood Votes (\$500) and Passing the Touch PAC (\$1,000)); and one anonymous contribution for \$20.	\$46,085.00	10/18/2018	0
10/15/2018	10/15/2018	Four contributions received from two individuals, a PAC (Children's Campaign Fund) and the Washington State Democrats.	\$11,350.00	10/16/2018	0
10/16/18 – 10/18/18	10/19/2018	Six-page C-3 report depicting 59 contributions from individuals ranging from \$6 to \$500 and 28 contributions of small contribution \$25 or less not itemized totaling \$574.	\$6,851.00	10/20/2018	0
10/16/18 -10/19/18	10/19/2018	Three-page C-3 report depicting 18 contributions from individuals ranging from \$7.40 to \$200 and 222 small contributions of \$25 or less not itemized totaling \$1,810.70.	\$2,925.70	10/22/2018	0
10/18/2018	10/18/2018	Two-page C-3 report depicting five contributions from individuals ranging from \$50 to \$1,000; three contributions from PACs (Spokane Tribe of Indians (\$1,000), Professional & AMP (\$200), and Democracy for America (\$230)); and one small contribution \$25 or less not itemized totaling \$20.	\$3,300.00	10/18/2018	0

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
10/21/18 – 10/26/18	10/26/2018	Four-page C-3 report depicting 34 contributions from individuals ranging from \$10 to \$1000 and 18 small contributions \$25 or less not itemized totaling \$326.11.	\$6,722.11	10/28/2018	0
10/24/18 & 10/29/18	10/30/2018	Two contributions from Pramila for Congress Committee and the Washington Senate Democratic Caucus Committee.	\$6,000.00	10/31/2018	1
10/27/18 – 10/29/18	10/29/2018	Three-page C-3 report depicting 18 contributions from individuals ranging from \$6 to \$100 and 10 small contributions \$25 or less not itemized totaling 182.	\$1,445.00	10/30/2018	0
10/30/18 – 11/02/18	11/02/2018	Four-page C-3 report depicting 28 contributions from individuals ranging from \$6 to \$270, including 11 small contributions \$25 or less not itemized totaling \$162.	\$2,289.00	11/5/2018	0
11/4/18 – 11/8/18	11/8/2018	Two-page C-3 report depicting 16 contributions from individuals ranging from \$10 to \$100; \$225 in total anonymous contributions; and five contributions of \$25 or less not itemized totaling \$44.	\$753.00	12/10/2018	0
Totals			\$148,870.21		

- PDC staff reviewed the 40 C-3 reports filed by the Campaign and listed in the table above totaling \$148,870.21 which represented about 49.8 percent of the \$298,776.01 in total contributions received during the 2018 election cycle. As noted in the table above, the Campaign timely filed 39 out of the 40 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 (other than the bona fide party committees listed above).

- Staff’s review also indicated the Campaign disclosed the required Employer and Occupation information for the 201 individuals who contributed more than \$100 to the Campaign, totaling \$59,865.50 in contributions received.
- Of the 201 individuals who disclosed their Employer and Occupation information, 42 listed their Occupation as being “Retired.” Those 42 retirees contributed a total of \$14,700 to the 2018 Campaign.
- The PDC audit procedures include staff identifying contributors that made monetary contributions to the Campaign and then verifying or confirming information disclosed for 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 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:

Date Received - Campaign	Contributor name	Amount	C-3 Report Filed	Date Made by Donor	Disclosed by Donor
10/5/2018	UFCW 21 PAC	\$1,000	10/7/2018	10/3/2018	C-4 report
7/30/2018	IBEW Local 77 PAC	\$1,000	7/31/2018	7/27/2018	C-4 report
8/06/2018	PAC 48 of Washington	\$1,000	8/6/2018	7/30/2018	C-4 report
9/12/2018	Kennedy Fund	\$1,000	9/17/2018	9/12/2018	C-4 report
9/24/2018	Island PAC	\$1,000	9/30/2018	9/23/2018	C-4 report
9/28/2018	Harry Truman Fund	\$1,000	9/30/2018	9/21/2018	C-4 report
10/24/2018	Civic Action PAC	\$1,000	10/26/2018	10/19/2018	C-4 report
10/12/2018	Washington Education Association PAC	\$1,000	10/15/2018	10/8/2018	C-4 report
8/2/2018	Spokane County Democratic Central Committee	\$1,900	8/3/2018	8/2/2018	C-4 report
10/16/2018	Washington Values PAC	\$1,000	10/16/2018	10/15/2018	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 chart below:

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
February 2018 C-4 report	3/12/2018	3/7/2018	\$97.74	\$97.74	\$43.77 for Telephones: Grasshopper Group, LLC; \$21 for PO Box: USPS; \$20 for Online Advertising: Facebook; and \$12.97 for Web Hosting: Google.	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
March 2018 C-4 report	4/10/2018	4/09/2018	\$13,784.00	\$2,317.41	\$435.20 made to Alyson McGuire Photography for Photography; \$600 to Connor Gragg for Salary; \$750 to NGP for Software Rental; \$308.75 to Sequana Studio for Graphic Design; \$56 to Bank of America for Banking Supplies; and \$152 for WA Dept. of Revenue for Business License.	0
April 2018 C-4 report	5/10/2018	5/10/2018	\$11,228.00	\$16,320.87	\$1,000 made to Hanna Olsen for Communication Consulting; \$4,692.24 to Connor Gragg for Salary; \$1,750 to Raven McShane for Fundraising Consulting; \$629.80 to Lawton Printing Services for Printing Yard Signs; \$1405 to Moxie Media Inc., for General Strategy Consulting and Printing Remits (1000): Overnight Printing; \$2,021.02 to Dena Ogden for Salary; \$230.96 to Priceline for Lodging: J. Lewis, 4/11-4/12, Omni Shoreham Hotel (Washington DC); and \$54.14 to UPS for Postage.	0
May 2018 C-4 report	6/11/2018	6/11/2018	\$7,699.88	\$9,689.71	\$1,250 to Blue Wave Political Partners for Compliance Consulting; \$1,000 to Hanna Olsen for Communication Consulting; \$850.04 to Jessica Anundson for Salary; \$2,344.12 to Connor Gragg for Salary; \$477.76 to the Secretary of State for Filing Fee; and \$750 to NGP Van Inc., for Software Rental.	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	\$11,182.36	\$10,938.69	\$3,911.61 to Capitol City Press for Direct Mail Postage (17,788); \$97.53 to Facebook for Online Advertising: 4/30 – 5/21; \$850.04 to Jessica Anundson for Salary; \$2,459.38 to Madeline Brown for Salary; \$222.39 to Alaska Airlines for Air Travel: J Lewis 6/21-6/22, Spokane to Seattle RT; \$270.64 to La Quinta Inn Suites for Lodging: J Lewis 6/21 – 6/22; and \$196 to USPS for Postage.	0
2018 7-Day Pre Primary C-4 report	7/31/2018	7/31/2018	\$12,404.40	\$2,179.62	\$200 to Hanna Olsen for Communication Consulting; \$125 to Data Genomix for Software Rental; \$99.47 to Facebook for Online Advertising 7/28 – 8/2; \$210 to NGP Van Inc for Software Rental; \$350 to Kandace Watkins for Fundraising Consulting; and \$1,000 to Don Hamilton for Video Production.	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2018 Post-Primary C-4 report	9/10/2018	9/10/2018	\$25,268.50	\$37,073.23	<p>\$1,500 made to Blue Wave Political Partners for Compliance Consulting; \$4,839.58 to Madeline Brown for Salary; \$425.02 to Jessica Anundson for Salary; \$240 to Hanna Olsen for Communication Consulting; \$100 to Brian Bomhoff for Postage: USPS; \$723.36 to Buttonsmith Inc., for Buttons (50) and Doorbellers (5000); \$61.81 to Facebook for Online Advertising: 7/31-8/5; \$100 to Facebook for Online Advertising 8/6-8/7; \$478 to Alaska Airlines for Travel – J. Lewis (4/11-4/16); \$504.40 to Alaska Airline for Travel – C. Gragg (4/11-4/16); \$1,750 to Raven McShane for Fundraising Consulting; \$9,031 to Moxie Media Inc., for Direct Mail (17,085): Capitol City Press and Literature Cards (5000): Lawton Printing; \$960 to NGP Van Inc., for Software Rental; \$1,362.01 to Preferred Labor Sign Association for Printing Yard Signs (250), Banner (1), and Stickers (1,500); \$550 to Kandace Watkins for Fundraising Consulting; \$108.79 to The General Store for Event Supplies; \$63.55 to Umpua Bank for Banking Supplies; and \$75 to NW Unity for Event Booth fee.</p>	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2018 21-Day Pre-General C-4 Report	10/16/2018	10/16/2018	\$125,911.45	\$82,674.22	17 expenditures made to Moxie Media Inc., totaling \$43,559.80 for Printing Remits (1500): Lawton Printing; General Strategy Consulting, Design and Coordination, Lit Cards (5000): Lawton Printing, Comcast Cable Advertising on (Bravo, CNN, CMDY, HGTV, HIST, MSBC, NFLN, ESPN, ESPN, ESPN 2, SPK, TBSC, and PDTV (10/10 – 10/24)); and Media Production; \$6,000 to Blue Wave Political Partners for Compliance and Fundraising Consulting; \$1,242.60 to Madeline Brown for Salary; \$455.40 to Alaska Airlines for Air Travel: J. Lewis, Spokane to Seattle RT: 10/10-10/11; 842.32 to Brian Bomhoff for Catering: Metropolitan Grill; \$284.17 to Brian Bomhoff for Event Supplies: QFC; \$334.64 to Madeline Brown for Mileage Reimbursement; \$1,242.60 to Madeline Brown for Salary; \$125 to Cheney School. District N 36 for Site Rental; \$100 to Facebook for Online Advertising (10/4 – 10/15); \$5,493.40 to Leann Ledford for Salary; \$2,148.60 to Preferred Labor Sign Association for Printing Yard Signs (500) with frames; and \$370.27 to Overnight Printing for Envelopes/Letterhead (1000) each.	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2018 7-DayPre-GeneralC-4 report	10/30/2018	10/30/2018	\$63,582.36	\$78,769.73	15 expenditures made to Moxie Media, Inc., totaling \$40,000 for Online Advertising: Facebook 10/16-11/5, Online Advertising: Banner Ads 10/16-11/5, Online Advertising: Pre-Roll Video 10/16-11/5, Comcast Cable Advertising on (Bravo, CNN, CMDY, HGTV, HIST, MSBC, NFLN, ESPN, ESPN, ESPN 2, SPK, TBSC, and PDTV (10/24 – 10/31)); \$200 to Seattle Labor Temple Association for Site Rental; \$1,500 to The Clark Company for Radio Advertising (10/17-11/6): KXLY AM; and \$1,540 to The Clark Company for Radio Advertising (10/17-11/6): KQNT AM.	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2018 Post General election C-4 report	12/10/2018	12/10/2018	\$27,695.06	\$50,942.79	13 expenditures made to Moxie Media, Inc., totaling \$15,000 for Printing Doorbeller (7500): Lawton Printing; Cable Advertising on (BRVO, CNN, CMDY, HGTV, HIST, MSBC, NFLN, ESPN, ESPN, ESPN 2, SPK, TBSC, and PDTV (10/24 – 11/6)); \$2,500 to The Clark Company for Radio Advertising: KXLY (10/31-11/6) and KEYF (10/31-11/6); \$5,237.86 to Jessa Lewis for Partial reimbursement of lost wages (10/1-11/6) and Telephone: Verizon; \$5,237.86 to Leann Ledford for Salary; \$762.94 to Hustle Inc., for Telephones; \$235.05 to Facebook for Online Advertising 11/3 – 11/6; \$493.98 to Jace Bylenga for Salary; and \$1,750 to Blue Wave Political Partners for Compliance and Fundraising Consulting.	0

- The Campaign disclosed orders placed, debts or obligations on six C-4 reports filed for the 2018 election cycle, that included: (1) \$20,965.41 in orders placed disclosed on the 21-Day Pre-Primary C-4 report for communication consulting, general strategy consulting/website, fundraising and compliance consulting, printing and direct mail estimate; (2) \$21,561.42 in orders placed, debts or obligations disclosed on the 7-Day Pre-Primary C-4 report for fundraising and compliance consulting, direct mail estimate, printing, doorbells, video production, printing, yard signs (250), banners (4), and general strategy consulting/website; (3) \$28,850.62 in orders, debts or obligations disclosed on the 21-Day Pre-General C-4 report for the estimated cost of radio, online and print advertising, including telephone; (4) \$20,375 in orders, debts or obligations placed on the 7-Day Pre-General C-4 report for TV Ads (10/30 – 11/6), Radio Advertising (10/31-11/6), Doorbeller (7,500) and Telephone Estimate.
- 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 49 expenditures to NWP Consulting totaling \$111,495.80 for services that included services for cable advertising, online, digital, print advertising, and printing mail pieces and door belling, graphic design work and consulting as detailed below:
 - 24 expenditures totaling \$45,000 for Comcast Cable advertising.
 - 13 expenditures totaling \$15,000 for Cable TV advertising.
 - Three expenditures totaling \$29,545 for online advertising (Facebook, Banners and Pre-Roll Video) and media production.
 - Nine expenditures totaling \$21,995.80 for printing doorbell pieces, design and coordination, literature cards, direct mail, printing permits, design and overnight printing for advertising, overnight printing and general strategy consulting.
 2. The Campaign made eight expenditures to Blue Wave Political Partners LLC totaling \$12,750 for Fundraising and Compliance Consulting for the periods 3/25 to 12/17/2018.
 3. The Campaign made 25 expenditures totaling \$33,360.61 during the 2018 election to six different Campaign staff members for Campaign work.
- As part of the audit, PDC staff requested the Campaign to provide copies of the books of account maintained for 15 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 March 24, 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. Multiple expenditures were made to Moxie Media, Inc. by the Campaign during the 2018 election, that included the following:
 - Three expenditures totaling \$25,000 were made on October 19, 2018 for “Online Advertising” and included a \$12,000 expenditure for “Banner Ads 10/16 – 11/5/2018;” a \$8,000 expenditure for “Pre-Roll Video 10/16 – 11/5/2018;” and a \$5,000 expenditure for “Facebook 10/16 – 11/5/2018.”
 - The documentation provided by the Campaign included a copy of a \$25,000 check (#1034) dated 10/19/18 and written payable to *Moxie Media* for invoice number 1654 (dated 10/15/2018) for Digital ad buy – DS Political for \$24,500 and Creative for \$500.

- Twelve separate expenditures were listed on the C-4 report (likely only one Campaign expenditure was actually made to Moxie Media) totaling \$15,000 and all were made on November 5, 2018, for “Cable Advertising” on multiple Cable TV stations for the period 10/24 – 11/6/2018.
 - The documentation provided by the Campaign included a copy of a \$15,000 check (#1035) made payable to *Moxie Media* for invoice number 1750 (dated 10/23/2018) for “Comcast Cable buy (10/24 to 10/31).”
- Three expenditures totaling \$11,531 were made for printing services that included a \$6,231 expenditure made to Capitol City Press on August 7, 2018 for “Direct Mail (\$17,085);” a \$2,800 expenditure made to Lawton Printing on August 14, 2018 for “Literature Cards (\$5,000);” and a \$2,500 expenditure made to Lawton Printing on November 5, 2018 for “Printing Doorbell (7,500).”
 - The documentation provided by the Campaign included a copy of: (a) \$6,231 check (#1007) dated 8/7/18 written payable to *Moxie Media* for invoice number 1269 (dated July 11, 2018) for “Professional services and coordination of Lewis #1 (5.66”x 21,” one folds to 5.66” x 10.5,” color brochures) to 17,082HH;” (b) a \$2,800 check (#1012) dated 8/14/18 written payable to *Moxie Media* for invoice number 1141 (dated 5/7/2018) for “Production of 5,000 pieces of (6”x11,” 4 color cards) Jessa Lewis lit cards (Lawton Press);” and (c) a \$17,500 check (#1038) dated 11/5/18 and written payable to *Moxie Media* for invoice number 1819 (dated 10/29/2018) for “7,500 Lewis doorbell pieces (Lawton Printing)” for \$2,500 and “Comcast cable buy (10/30 to 11/6)” for \$15,000.
- 2. Four expenditures to the Clark Company totaling \$5,540 for Radio Ad buys that included a \$1,540 expenditure made on October 19, 2018 for ads on KQNT AM; a \$1,500 expenditure made on October 19, 2018 for KXLY AM (10/17 – 11/6/2018); a \$1,500 expenditure made on November 2, 2018 for KXLY (10/31 – 11/6/2018); and a \$1,000 expenditure also made on November 2, 2018 to KEYF for Radio ads (10/31 – 11/6/2018).
 - The documentation provided by the Campaign included a copy of: (a) \$3,040 check (#1032) dated 10/19/18 and written payable to *The Clark company* for invoice number 2018-10 (dated 10/16/18) for “Radio Advertising: KXLY AM: 100x for \$1,500 and KQNT AM: 28x for \$1,540;” and (b) \$2,500 check (#1037) dated 11/2/18 and written payable to *The Clark Company* for invoice number 2018-10A (dated 10/29/2018) for “Additional Radio Advertising: KXLY FM – Coyote County – AM drive, 10/31-11-16 Mon-Fri (\$1,500) and KEYF 101 FM: AM/PM drive 10/31-11/6 (AM drive only on 11/6)” for \$1,000.
- 3. A \$3,783.01 expenditure made to Jessa Lewis as a “Partial reimbursement of lost wages 10/1 – 11/6/2018.”
 - The documentation provided by the Campaign included a copy of: (a) \$3,783.01 check (#1040) written on 11/13/18 payable to *Jessa Lewis* for “10/1 – 11/6” and a copy of the “HCFA-WA Contractors” contract to document the wage loss claim.

4. Two expenditures totaling \$3,510.61 were made to Preferred Labor Sign Association that included a \$2,148.60 expenditure made on September 10, 2018 to print 500 signs with frames; and a \$1,362.01 expenditure made on August 1, 2018 to print 250 signs, 1,500 stickers and a banner.
 - The documentation provided by the Campaign included a copy of: (a) \$1,362.01 check (#1005) that was paid to the *Preferred Labor Sign Association* dated 8/1/18 for invoice number JL18-2391 – dated 6/1/18 for “250 – Yard Signs with “H” frames and 1 – 3 x 6 Banner;” and (b) a check for \$2,148.60 made payable to the *Preferred Labor Signs* dated 9/10/18 (check # 1019) for invoice number JL18-2644 for “500 – Yard Signs – 1 color 2 sided with “H” frames” dated 8/22/2018.
5. Five \$100 expenditures were made to Facebook between 10/15 and 10/22/2018 for “Online Advertising” covering the period October 4 through 22, 2018.
 - The documentation provided by the Campaign included a copy of an itemization of Facebook expenditures depicting “Page Promotions” and “Boosted Posts” for Jessa Lewis, including the amount spent for each individual page promotion and boosted post for the months for September and October 2018.

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 March 24, 2021, the Campaign provided a response to staff’s questions about the internal control processes.

Audit Exhibit #2

Campaign Contributions:

The Campaign stated that during the 2018 election, it “utilized campaign filing software from NGP Van Inc., and that the contribution “Checks from events were handed to the treasurer’s compliance team within 48 hours by the campaign’s fundraising team. Checks from the mail were immediately forwarded by the campaign to the treasurer.” All contributors’ checks were entered into the filing software by Josie Olsen, scanned and uploaded to the campaign’s electronic drive, then taken to the bank and deposited within five business days of being received by an agent of the campaign. During this process, the Campaign stated: “Ms. Olsen would ensure all required donor information was included, on-file, or otherwise obtained in a timely manner. Any contributions that exceeded the contribution limit were returned or refunded within five business days.”

The Campaign further stated that “Credit Card contributions were received through two merchant accounts: ActBlue and First Data Merchant Services. ActBlue contributions were imported to the filing software by Ms. Olsen, while First Data contributions integrated directly into the filing software.” The Campaign stated that the contributions were deposited in the bank account within two business days of being processed, and the contributor information provided

included name, address, employer, occupation, employer city, and employer state. The Campaign further stated “each C3 report represented only deposit of the contributions received, and that all contributions were reconciled by the compliance team using QuickBooks accounting software, and this process was repeated at least once a week, or more often depending on weekly activity.” The treasurer’s office also provided a form to the campaign that was used to record any non-monetary contributions.

Campaign Expenditures:

The Campaign stated: “All expenses were approved by the candidate prior to payment. Invoices and requests for payment were either submitted to the treasurer’s office from the candidate or were paid on the candidate’s campaign debit card. The general strategy consultant, Northwest Passage Consulting (NWP), worked with the candidate to create any political advertisements. Once approved, NWP facilitated the publication of literature, direct mail, and online advertisements. All invoices and check requests were required to be on-file prior to payment, per record keeping requirements.”

The Campaign also stated that “In the case of cable media, the channel breakdown was also requested as soon as it became available. Mr. Petterson and Ms. Olsen also maintained any other vendor information as it pertains to IRS requirements.” Additionally, the Campaign by way of Ms. Olsen, would send a reminder email to the candidate, Campaign staff, and consultants at the end of every C4 reporting period requesting all invoices, debts, estimates, and in-kinds for reporting purposes be submitted to her so she could file the C-4 report.

Contribution and Expenditure Reports:

The candidate would receive weekly reports regarding contribution and expenditure activities via a financial update from the treasurer/compliance team. The treasurer/compliance team would search for duplicate records and merge them into one record, and review reports for any missing donor information before generating and electronically filing the reports. In addition, the candidate was provided drafts of PDC reports prior to filing.

Campaign records are stored electronically, and the campaign books are domiciled in the accounting software used by the treasurer. Copies of contribution and expenditure activities were scanned and uploaded to the campaign’s electronic drive on a daily basis. Other records include vendor contracts, employment and payroll records, business license and other tax forms, and bank statements.

The treasurer, Mr. Petterson, was responsible for campaign records. The ministerial treasurer, Ms. Olsen, also assisted in curating records. Any scans were updated every day during the public inspection period, however no-one from the campaign including Mr. Petterson and Ms. Olsen received any requests.

A reimbursement form was provided by the campaign. The candidate or any other person was required to complete the form, provide corresponding receipts and receive approval from the candidate prior to being reimbursed.

IV.

Audit Documents Reviewed, Provided and Respondent Correspondence

- C-1 reports, C-3 reports, and C-4 reports filed by the 2018 Jessa Lewis Senate Campaign covering the period February 1, through December 31, 2018.
- Email exchanges between PDC staff and Jay Petterson, with Blue Wave Consulting, on behalf of the Friends of Jessa Lewis 2018 Senate Campaign.
- PDC staff queried the PDC Contribution and Expenditure database for the 2018 Friends of Jessa Lewis State 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 1st 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 shall 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 April 2021.

Erick O. Agina
PDC Compliance Officer

Audit Exhibits

- Audit Exhibit #1** Documents provided by the 2018 Friends of Jessa Lewis Senate Campaign to the PDC on March 24, 2021, concerning the expenditures selected for audit.
- Audit Exhibit #2** Letter from the 2018 Friends of Jessa Lewis Senate Campaign Treasurer provided by the Campaign to the PDC on March 24, 2021, concerning the campaign practices and procedures.

FRIENDS OF JESSA LEWIS

PO BOX 8755
SPOKANE, WA 99203

1034

96-505/1232
50020

90/19/18

Date



Pay to the
Order of

Moxie Media

\$ 25,000.00

Twenty-five thousand and 00/100

Dollars



Photo
Safe
Deposit®
Details on back



UMPQUA
B · A · N · K

1-866-4UMPQUA
(1-866-486-7782)

For

Ino 1654

MP

Audit Exhibit #1

Page 1 of 28



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

Invoice



BILL TO

Jessa Lewis
Elect Jessa Lewis

INVOICE #	DATE	TOTAL DUE	ENCLOSED
1654	10/15/2018	\$25,000.00	

ACTIVITY	AMOUNT
Digital ad buy (10/16 to 11/5) - DSPolitical	24,500.00
Creative	500.00

BALANCE DUE

\$25,000.00



Josie Olsen <josie@bluewavepolitics.com>

Digital breakdown

Bayley Dodd <bayley@moxiemedia.biz>
To: Josie Olsen <josie@bluewavepolitics.com>

Tue, Oct 30, 2018 at 6:14 PM

Jessa Lewis - \$25,000 total
Facebook: \$5,000
Banner/targeted digital: \$12,000
Pre-roll video: \$8,000

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Quoted text hidden]

FRIENDS OF JESSA LEWIS

PO BOX 8755

SPOKANE, WA 99203

1035

96-505/1232

50020

10/29/18

Date



Pay to the
Order of

Moxie Media

\$ 15,000.00

fifteen thousand and 00/100

Dollars



Photo
Safe
Deposit®
Details on back



UMPQUA
B · A · N · K

1-866-4UMPQUA
(1-866-486-7782)

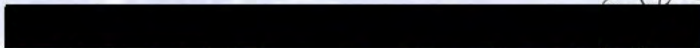
For INV# 1750

MP

Audit Exhibit #1

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1:



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

Invoice



BILL TO
Jessa Lewis
Elect Jessa Lewis

INVOICE #	DATE	TOTAL DUE	ENCLOSED
1750	10/23/2018	\$15,000.00	

ACTIVITY	AMOUNT
Comcast Cable buy (10/24 to 10/31)	15,000.00
BALANCE DUE	\$15,000.00

Table 1	TOTALS	10/10-10/24	10/24-10/31	10/30-11/6
Total	\$60000.00	\$30,000.00	\$15000.00	\$15,000.00
BRVO-TV	\$2865.00	\$1,432.50	\$716.25	\$716.25
CNN -TV	\$4880.00	\$2,440.00	\$1220.00	\$1,220.00
CMDY-TV	\$1000.00	\$500.00	\$250.00	\$250.00
HGTV-TV	\$3445.00	\$1,722.50	\$861.25	\$861.25
HIST-TV	\$2660.00	\$1,330.00	\$665.00	\$665.00
MNBC-TV	\$4985.00	\$2,492.50	\$1246.25	\$1,246.25
NFLN-TV	\$16305.00	\$8,152.50	\$4076.25	\$4,076.25
ESPN-TV	\$4350.00	\$2,175.00	\$1087.50	\$1,087.50
ESP2-TV	\$965.00	\$482.50	\$241.25	\$241.25
SPK -TV	\$1255.00	\$627.50	\$313.75	\$313.75
TBSC-TV	\$5290.00	\$2,645.00	\$1322.50	\$1,322.50
PDTV	\$12000.00	\$6,000.00	\$3000.00	\$3,000.00

FRIENDS OF JESSA LEWIS

PO BOX 8755
SPOKANE, WA 99203

1007

96-505/1232
50020

8/7/18

Date



Pay to the Order of Moxie Media

\$ 6231.00

six thousand two hundred thirty one and ⁰⁰/₁₀₀ Dollars



Photo Safe Deposit®
Details on back

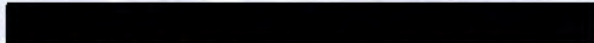


UMPQUA
B · A · N · K

1-866-4UMPQUA
(1-866-486-7782)

For INV # 1269

[Handwritten Signature]
Audit Exhibit #1 ^{MP}



1007

Page 7 of 28

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

Invoice

BILL TO
Jessa Lewis
Elect Jessa Lewis

INVOICE #	DATE	TOTAL DUE	ENCLOSED
1269	07/11/2018	\$6,231.00	

ACTIVITY	AMOUNT
Professional services and coordination of Lewis #1 (5.66" x 21", one folds to 5.66" x 10.5", 4 color brochures) to 17,082HH	6,231.00
BALANCE DUE	\$6,231.00

Audit Exhibit #1
Page 8 of 28

FRIENDS OF JESSA LEWIS

PO BOX 8755

SPOKANE, WA 99203

1012

96-505/1232

50020

8/14/18

Date



Pay to the
Order of

Morie Medic

\$2800.00

two thousand eight hundred and 00/100

Dollars



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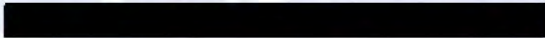


UMPQUA
B · A · N · K

1-866-4UMPQUA
(1-866-486-7782)

For INV# 1141

Audit Exhibit #1



1012

Page 9 of 28

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

Invoice

BILL TO
Jessa Lewis
Elect Jessa Lewis

INVOICE #	DATE	TOTAL DUE	ENCLOSED
1141	05/07/2018	\$2,800.00	

ACTIVITY	AMOUNT
Production of 5,000 pieces of (6" x 11", 4 color cards) Jessa Lewis lit cards (Lawton Press)	2,800.00
BALANCE DUE	\$2,800.00

FRIENDS OF JESSA LEWIS

PO BOX 8755
SPOKANE, WA 99203

1038

96-505/1232
50020

11/5/18

Date



Pay to the
Order of

Noxie Media

\$ 17,500.00

seventeen thousand five hundred and 00/100

Dollars



Photo
Safe
Deposit®
Details on Back



UMPQUA
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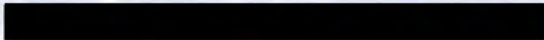
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(1-866-486-7782)

For INV# 1819

[Handwritten Signature]

Audit Exhibit #1

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1038

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

Invoice



BILL TO

Jessa Lewis
Elect Jessa Lewis

INVOICE #	DATE	TOTAL DUE	ENCLOSED
1819	10/29/2018	\$17,500.00	

ACTIVITY	AMOUNT
7,5000 Lewis doorbell pieces (Lawton Printing)	2,500.00
Comcast cable buy (10/30 to 11/6)	15,000.00
BALANCE DUE	\$17,500.00

FRIENDS OF JESSA LEWIS

PO BOX 8755

SPOKANE, WA 99203

1037

96-505/1232

50020

11/2/18

Date



Pay to the
Order of

The Clark Company

\$ 2500.00

two thousand five hundred and 00/100

Dollars



Photo
Safe
Deposit®
Details on back



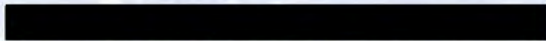
UMPQUA
B · A · N · K

1-866-4UMPQUA
(1-866-486-7782)

For INV# 1018-1078

Audit Exhibit #1

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1037

THE CLARK COMPANY
 30 E Sprague, Suite A
 Spokane, WA 99202
 509-838-4080 * Fax 509-838-4631
www.clarkadpsr.com

INVOICE

DATE: 10/29/2018
 INVOICE # 2018-10A

BILL TO

Josie Olsen, Treasurer
 Friends of Jessa Lewis
 PO Box 8755
 Spokane, WA 99203
josie@bluewavepolitics.com

DESCRIPTION	TAXED	AMOUNT
Advertising Services - October 2018		
Additional Radio Advertising:		
KXLY FM - Coyote Country - AM drive, 10/31-11/6 Mon-Fri		1,500.00
KEYF 101 FM: AM/PM drive 10/31-11/6 (AM drive only on 11/6)		1,000.00
Project management		no charge
OTHER COMMENTS		
1. Total payment due in 30 days 2. Please include the invoice number on your check		

TOTAL Due \$2,500.00
 Make all checks payable to
The Clark Company

Thank You For You Business!

FRIENDS OF JESSA LEWIS

PO BOX 8755

SPOKANE, WA 99203

1032

96-505/1232

50020

10/19/18

Date



Pay to the
Order of

The Clark Company

\$ 3040.⁰⁰

Three thousand forty & 00/100

Dollars



Photo
Safe
Deposit®
Details on back



UMPQUA
B · A · N · K

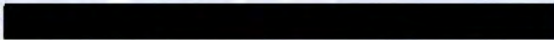
1-866-4UMPQUA
(1-866-486-7782)

For INV 2018-10

MP

Audit Exhibit #1

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1032

THE CLARK COMPANY
 30 E Sprague, Suite A
 Spokane, WA 99202
 509-838-4080 * Fax 509-838-4631
www.clarkadpsr.com

INVOICE

DATE: 10/16/2018
 INVOICE # 2018-10

BILL TO

Josie Olsen, Treasurer
 Friends of Jessa Lewis
 PO Box 8755
 Spokane, WA 99203
josie@bluewavepolitics.com

DESCRIPTION	TAXED	AMOUNT
Advertising Services - October 2018		
Radio Advertising:		
KXLY AM: 100x		1,500.00
KQNT AM: 28x		1,540.00
Radio Production, project management		no charge
OTHER COMMENTS		
1. Total payment due in 30 days		
2. Please include the invoice number on your check		

Thank You For You Business!

TOTAL Due \$3,040.00
 Make all checks payable to
 The Clark Company

FRIENDS OF JESSA LEWIS

PO BOX 8755
SPOKANE, WA 99203

1040

96-505/1232
50020

11/13/18

Date



Pay to the
Order of

Jessa Lewis

\$ 3783.01

Three thousand seven hundred eighty three and ⁰¹/₁₀₀

Dollars



Photo
Safe
Deposit®
Details on back



UMPQUA
B · A · N · K

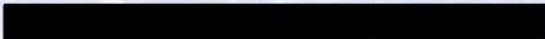
1-866-4UMPQUA
(1-866-486-7782)

For 10/1 - 11/6

MP

Audit Exhibit #1

Page 17 of 28



1040

I have included three pieces of the contract between Health Care for All Washington and Jessa Lewis. This contract was not related to Ms. Lewis' 2018 campaign but was obtained as a record demonstrating lost income/loss of a contract due to campaign obligations. To maintain the confidentiality of the terms of the contract, relevant portions related to compensation have been included here to comply with the audit. Please let us know if more information is necessary. – J.Olsen 3/23/2021



**EVERYBODY IN,
NOBODY OUT.**

P.O. Box 30506 Seattle, WA 98113 • www.healthcareforallWA.org

Regional Director Contract

THIS REGIONAL DIRECTOR AGREEMENT (the "Agreement") is made and entered into this ___ day of _____ 2018, with an "Effective Date" of _____ 2018) by and between Health Care for All -Washington, a Washington state non-profit organization (hereinafter referred to as the "Organization") and Jessa Lewis (hereinafter referred to as the "Regional Director (RD)"). This Agreement shall extend through ___ 2018. This contract can be extended or renegotiated for another period of time by mutual agreement at that time.

2. COMPENSATION

(a) The RD agrees that all Services will be rendered by her as an independent contractor and that this Agreement does not create an employer-employee relationship between the RD and the Organization. The RD shall have no right to receive any employee benefits including, but not limited to, health and accident insurance, life insurance, sick leave and/or vacation. RD agrees to pay all taxes including, self-employment taxes due in respect of the payment collected and to indemnify the Organization in the event the Organization is required to pay any such taxes by reason of its relationship with the RD.

(b) Subject to the provisions hereof, the Organization shall pay RD a fee of \$4,000 each month for Services provided to the Organization paid on a bi-monthly basis. These services are reflected as outlined in the quarterly project goals developed by the Program Director, the Regional Directors, and the Board.

(c) RD shall be entitled to prompt reimbursement for all pre-approved expenses (e.g., lodging, meals, transportation costs, and mileage at the federal reimbursement rate of \$0.54/mi) incurred in the performance of her Duties, upon submission and approval of written statements and receipts.

(d) The Program Director, in consultation with the President of the Organization and the Executive Committee, shall be the person responsible for directions to and supervision of the RD.

IN WITNESS WHEREOF, the parties have executed this Agreement effective as of the date first written above.

HEALTH CARE FOR ALL
WASHINGTON

By: _____ date _____

Marcia Stedman, President
Health Care for All-Washington

REGIONAL DIRECTOR

Jessa Lewis
Regional Director – Eastern WA

Audit Exhibit #1

Page 18 of 28



Josie Olsen <josie@bluewavepolitics.com>

Fwd: HCFA-WA Contractors' revised contracts and Goals/Metrics reports

Jessa Lewis <[REDACTED]>
To: Josie Olsen <josie@bluewavepolitics.com>

Fri, Nov 9, 2018 at 2:59 PM

Here's the contracts. If the full missing wage was covered for campaign it was 1.2 months or \$4800

----- Forwarded message -----

From: **Marcia Stedman** <marcia@healthcareforallwa.org>

Date: Fri, Mar 16, 2018 at 2:05 PM

Subject: HCFA-WA Contractors' revised contracts and Goals/Metrics reports

To: Chuck S. Richards <csrichards@msn.com>, Dana Iorio <ioriod@u.washington.edu>, DW4040 <dw4040@comcast.net>, Hal Stockbridge <h_stockbridge@hotmail.com>, Jeanne Ernst <jeannee206@aol.com>, Kelly Powers <kellystp@gmail.com>, Martha Koester <fomalhaut2003@yahoo.com>, Peter Lucas <petluc@comcast.net>, Ronald Shure <rushure64@gmail.com>, Sherry Weinberg <weinbergsk@msn.com>

CC: Bevin McLeod <bevin@healthcareforallwa.org>, Jessa Lewis <[REDACTED]>, Dale Porter <dale@healthcareforallwa.org>, Carmen Mendez <carmen@healthcareforallwa.org>, Sydnie Jones <sydnie@healthcareforallwa.org>

Dear Directors,

The contracts attached below have been reviewed and approved by the Executive Committee, and are presented for your review prior to voting for their ratification at Sunday's Board meeting. If you have any questions, please let me know, or ask at the Board meeting.

Since the three Regional Directors' contracts are identical except for the person's name, I am attaching only Jessa's as an example. After your ratification, these revised contracts will become effective when signed during the contract reviews which Marcia and Kelly will be conducting with each contractor in the coming weeks.






As previously requested, I have also attached the Field Team's Timeline and Goals for the next 10 months, and their Autumn Quarter Report. The Spring Quarter Report will be presented at April's Board meeting.

Happy reading!

Marcia

--
Sent from Gmail Mobile

5 attachments

-  **20180313 Consult Agree Bevin March 2018 -.doc**
62K
-  **Contract - Jessa.renew.doc.docx**
62K
-  **Comms. Lead Agreement - renewal.docx**
41K
-  **Field Team Timeline and Goals (March- Jan) .pdf**
202K
-  **HCFA Field Team _ Autumn Quarter Report .docx.pdf**
284K

Audit Exhibit #1
Page 19 of 28

FRIENDS OF JESSA LEWIS

PO BOX 8755

SPOKANE, WA 99203

1005

96-505/1232

50020

8/1/18

Date

 CHECK ARMOR
FRAUD PROTECTION

Pay to the Order of Preferred Labor Sign Assoc \$ 1362.01

one thousand three hundred sixty two and 01/100 Dollars



Photo
Safe
Deposit®
Details on back



UMPQUA
B · A · N · K

1-866-4UMPQUA
(1-866-486-7782)

For _____

MP

Audit Exhibit #1

Page 20 of 28

1005



Josie Olsen <josie@bluewavepolitics.com>

Fwd: Fw: Invoice Good Morning!

Jessa Lewis <jessa@electjessalewis.com>
To: Josie Olsen <josie@bluewavepolitics.com>

Tue, Jun 12, 2018 at 11:04 AM

----- Forwarded message -----

From: Yahoo <kaywrightmcg2003@yahoo.com>
Date: Sun, Jun 10, 2018 at 11:21 AM
Subject: Fw: Invoice Good Morning!
To: Jessa@electjessalewis.com

Kay Wright McGlocklin
Local 1094
Preferred Labor Sign Assoc
2704 N. Hogan # 3
Spokane, Wa 99207
509-484-1107

--- On Fri, 6/1/18, Yahoo <kaywrightmcg2003@yahoo.com> wrote:

> From: Yahoo <kaywrightmcg2003@yahoo.com>
> Subject: Invoice Good Morning!
> To: jessa@electjessalewis.com
> Date: Friday, June 1, 2018, 10:32 AM
> June 1, 2018
>
> Preferred Labor Sign
> 2704 N. Hogan # 3
> Spokane, WA 99207
>
> INVOICE # JL18-2391
>
> TO: Committee to Elect Jessa Lewis 6th
> District
>
> 4 - Digital Signs \$
> 12.00
>
> \$ 48.00
>
> 1 - 3 X 6 Banner
>
>
> \$ 90.00
>
> 250 - Yard Signs with "H"
> frames @ \$ 3.90 \$ 975.00
>
> 1500 Stickers - 1 color
>
>
> \$ 120.00
> Art/set up

Audit Exhibit #1
Page 21 of 28

FRIENDS OF JESSA LEWIS

PO BOX 8755

SPOKANE, WA 99203

1019

96-505/1232

50020

9/10/18

Date



Pay to the
Order of

Preferred Labor Signs

\$ 2,148.00

two thousand one hundred forty eight and ^{no}/₁₀₀

Dollars



Photo Safe
Deposit®
Detachable back



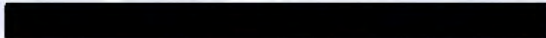
UMPQUA
B·A·N·K

1-866-4UMPQUA
(1-866-486-7782)

For INV# JL 18-2644

[Handwritten Signature]

Audit Exhibit #1 MP



1019

Page 23 of 28

Fwd: Jessa Invoice

Madeline Brown <madeline@electjessalewis.com>

Wed, Aug 22, 2018 at 12:25 PM

To: Josie Olsen <josie@bluewavepolitics.com>

Here is the invoice for the latest batch of yard signs

----- Forwarded message -----

From: **Yahoo** <kaywrightmcg2003@yahoo.com>

Date: Wed, Aug 22, 2018 at 12:02 PM

Subject: Jessa Invoice

To: Madeline Brown <madeline@electjessalewis.com>

August 22, 2018

Preferred Labor Sign
2704 N. Hogan # 3
Spokane, WA 99027

Invoice # JL18-2644

TO : Jessa Lewis for 6th District St. Senator

500 - Yard Signs - 1 color 2 sided with "H" frames @ \$ 395.00 \$ 1975.00

Sub Total \$ 1975.00

Sales Tax \$ 173.60

TOTAL \$ 2148.60




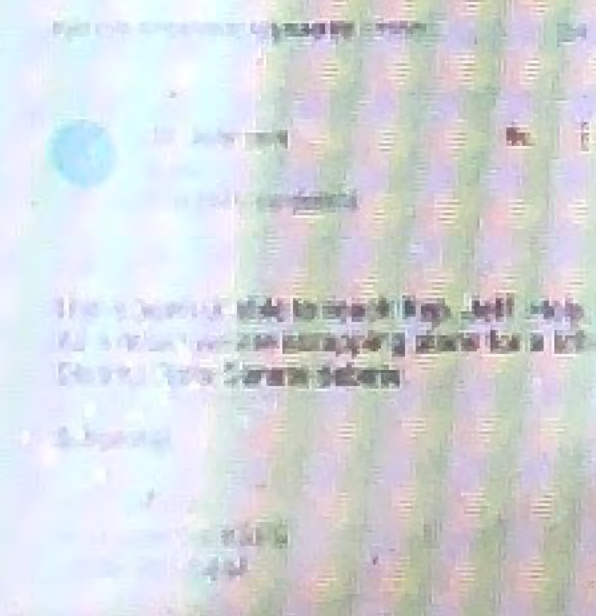

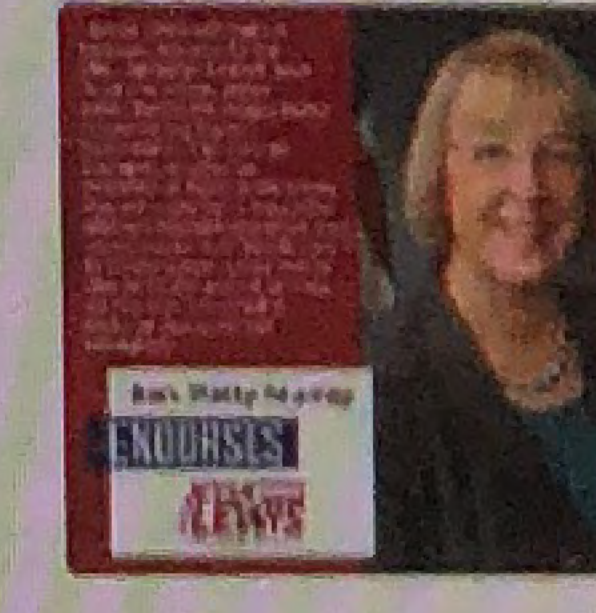

Thank you!

Kay Wright McGlocklin
Local 1094
Preferred Labor Sign Assoc
2704 N. Hogan # 3
Spokane, Wa 99207
509-484-1107

--
Madeline Brown | Campaign Manager

Audit Exhibit #1
Page 24 of 28

Notification **5** Insights Publishing T... **Promotions** Settings Help

	<p>Page Promotion</p> <p>Jessa Lewis is running for State Senate in W...</p> <p>Promoted by Jessa Lewis on Oct 4, 2018 Completed</p>	2,541 People Reached	73 Page Likes	\$49.98 Spent at \$5.00 pe...	View Results
	<p>Boosted Post</p> <p>Thank you again to the students, staff, and ...</p> <p>Promoted by Jessa Lewis on Oct 4, 2018 Completed</p>	765 People Reached	23 Link Clicks	\$10.00 Spent of \$10.00	View Results
	<p>Boosted Post</p> <p>Thank you Senator for your encouragement ...</p> <p>Promoted by Jessa Lewis on Oct 3, 2018 Completed</p>	50 People Reached	7 Post Engagement	\$0.88 Spent of \$10.00	View Results
	<p>Boosted Post</p> <p>I'm frustrated that in the most competitive S...</p> <p>Promoted by Jessa Lewis on Sep 29, 2018 Completed</p>	1,281 People Reached	205 Post Engagement	\$10.00 Spent of \$10.00	View Results
	<p>Boosted Post</p> <p>All of my heroes have been underdogs and t...</p> <p>Promoted by Jessa Lewis on Sep 20, 2018 Completed</p>	464 People Reached	87 Post Engagement	\$10.00 Spent of \$10.00	View Results
	<p>Boosted Post</p> <p>Sometimes it takes grit and a mother's dete...</p> <p>Promoted by Jessa Lewis on Sep 19, 2018 Completed</p>	692 People Reached	137 Post Engagement	\$10.00 Spent of \$10.00	View Results
	<p>Boosted Post</p> <p>I hope to see you at a town hall this Saturda...</p> <p>Promoted by Jessa Lewis on Sep 7, 2018 Completed</p>	338 People Reached	21 Post Engagement	\$9.70 Spent of \$10.00	View Results



State of Washington

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

March 10, 2021

Sent Electronically to Jessa Lewis and Jay Petterson, 2018 Campaign Treasurer

Subject: PDC Audit Letter, 2018 Jessa Lewis for Senate Campaign; PDC Audit No. 20-08

Dear Ms. Lewis and Mr. Petterson:

This letter is a follow-up to the email I sent to both of you notifying you that the 2018 Jessa Lewis for Senate Campaign had been selected for audit and that you would be receiving an email with this 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, lobbyists and lobbyist employers, and state agency lobbying activities in accordance with chapter 42.17 RCW. The PDC began conducting several limited-scope audits the first of December 2020, and early 2021.

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.

PDC staff has identified four 2018 Legislative Districts elections for State Senate that will comprise the initial audit pool of eight candidates selected for this limited-scope audit. The criteria used in selecting the 2018 Legislative candidates for audit was based on both candidates appearing on the November 6, 2018 general election ballot, in a contested election, with significant contribution and expenditure activities. Further, none of the 2018 candidates selected for audit would have filed as a candidate for the 2020 election.

Based on the criteria listed above, the 2018 State Senate race in the 6th Legislative District was selected for a limited-scope audit. For your information, the majority of the audit work for the audits will involve PDC staff reviewing information disclosed on C-3 reports and C-4 reports that were filed electronically by each campaign. Staff will confirm and verify select contributor and vendor expenditure information, and also requesting documentation from both Campaigns, including copies of campaign books of account maintained by the Campaign for the expenditures listed below.

The requested documentation includes copies of invoices, receipts, cancelled checks, emails and other memoranda for the following expenditures:

1. Multiple expenditures were made to Moxie Media, Inc. by the Campaign during the 2018 election, that included the following:
 - Three expenditures totaling \$25,000 were made on October 19, 2018 for “Online Advertising” and included a \$12,000 expenditure for “Banner Ads 10/16 - 11/5/2018”; a \$8,000 expenditure for “Pre-Roll Video 10/16 - 11/5/2018”; and a \$5,000 expenditure for “Facebook 10/16 – 11/5/2018.”
 - Twelve separate expenditures were listed on the C-4 report (likely only one Campaign expenditure was actually made to Moxie Media) totaling \$15,000 and all were made on November 5, 2018, for “Cable Advertising” on multiple Cable TV stations for the period 10/24 – 11/6/2018.
 - Three expenditures totaling \$11,531 were made for printing services that included a \$6,231 expenditure made to Capitol City Press on August 7, 2018 for “Direct Mail (17,085)”; a \$2,800 expenditure made to Lawton Printing on August 14, 2018 for “Literature Cards (5,000)”; and a 2,500 expenditure made to Lawton Printing on November 5, 2018 for “Printing Doorbeller (7,500).”
2. Four expenditures to The Clark Company totaling \$5,540 for Radio Ad buys that included a \$1,540 expenditure made on October 19, 2018 for ads on KQNT AM; a \$1,5000 expenditure made on October 19, 2018 for KXLY AM (10/17-11/6/2018); a \$1,5000 expenditure made on November 2, 2018 for KXLY (10/31 – 11/6/2018); and a \$1,000 expenditure also made on November 2, 2018 to KEYF for Radio ads (10/31 – 11/6/2018).
3. A \$3,783.01 expenditure made to Jessa Lewis as a “Partial reimbursement of lost wages 10/1 – 11/6/2018.”
4. Two expenditures totaling \$3,510.61 were made to Preferred Labor Sign Association that included a \$2,148.60 expenditure made on September 10, 2018 to print 500 signs with frames; and a \$1,362.01 expenditure made on August 1, 2018 to print 250 signs, 1,500 stickers and a banner.
5. Five \$100 expenditures were made to Facebook between 10/15 to 10/22/2018 for “Online Advertising” covering the period October 4 through 22, 2018.

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 contributions were deposited, and the filing of the C-3 report. In addition, if online contributions were received by the Campaign, please explain how 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, as well as 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 24, 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 pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s _____
Electronically Signed Kurt Young
Compliance Officer

/s _____
Electronically Signed Peter Lavalley,
PDC Executive Director



Friends of Jessa Lewis
401 2nd Ave S Ste 303
Seattle, WA 98104
josie@bluewavepolitics.com

March 24th, 2021

Public Disclosure
Commission
pdc@pdc.wa.gov

Re: PDC Audit Letter, 2018 Friends of Jessa Lewis

To Whom It May Concern:

This letter responds to audit request received by the Friends of Jessa Lewis 2018 campaign committee. Under the direction of Jay Petterson, the campaign treasurer, I have provided responses to the questions in the audit letter.

1. The campaign utilized filing software through NGP Van Inc. Checks from events were handed to the treasurer's compliance team within 48 hours by the campaign's fundraising team. Checks from the mail were immediately forwarded by the campaign to the treasurer. All checks were entered into the filing software by Josie Olsen, scanned and uploaded to the campaign's electronic drive, then taken to the bank within five business days of being received by an agent of the campaign. During this process, Ms. Olsen would ensure all required donor information was included, on-file, or otherwise obtained in a timely manner. Any contributions that exceeded the contribution limit were returned or refunded within five business days.

Credit Card contributions were received through two merchant accounts: ActBlue and First Data Merchant Services. ActBlue contributions were imported to the filing software by Ms. Olsen, while First Data contributions integrated directly into the filing software. These contributions settled in the bank account within two business days of the processing date. The online forms required contributors to enter their name, address, employer, occupation, employer city, and employer state. Each C3 report represents a deposit. All contributions were reconciled to the bank account using QuickBooks accounting software, and this process was repeated at least once a week, or more often depending on weekly activity.

The treasurer's office also provided a form to the campaign in order to record any non-monetary contributions.

2. All expenses were approved by the candidate prior to payment. Invoices and requests for payment were either submitted to the treasurer's office from the candidate or were paid on the candidate's campaign debit card. The general consultant, Moxie Media worked with the candidate to create any political advertisements. Once approved, Moxie Media facilitated the publication of literature, direct mail, and online advertisements.

All invoices and check requests were required to be on-file prior to payment, per record keeping requirements. In the case of cable media, the channel breakdown was also requested as soon as it became available. Mr. Petterson and Ms. Olsen also maintained any other vendor information as it pertains to IRS requirements.

Additionally, Ms. Olsen sent a reminder to the candidate, staff, and consultants at the end of every C4 reporting period requesting all invoices, debts, estimates, and in-kinds for reporting purposes.

3. The candidate received weekly reports regarding contributions and expenditures via a financial update from the treasurer/compliance team. The treasurer/compliance team would also search for duplicate records and merge them and review reports for any missing donor information before generating reports. Then the candidate was provided drafts of PDC reports prior to filing.
4. Campaign records are stored electronically, and the campaign books exist in the accounting software used by the treasurer. Copies of contributions and expenditures were scanned and uploaded to the campaign's electronic drive daily. Other records include vendor contracts, employment and payroll records, business license and other tax forms, and bank statements.
5. The treasurer, Mr. Petterson, is responsible for campaign records. The ministerial treasurer, Ms. Olsen, also assisted in curating records. Any scans were updated every day during the public inspection period, however no-one from the campaign including Mr. Petterson and Ms. Olsen received any requests.
6. A reimbursement form was provided to campaign. The candidate or any other person was required to complete the form, provide corresponding receipts, and receive approval from the candidate prior to being reimbursed.

Sincerely,

Josie Olsen
Blue Wave Political Partners