

Executive Summary and Staff Analysis
Saving Whatcom County dba Save Whatcom, PDC Case No. 14-004
Whatcom First, PDC Case No. 14-005

This summary highlights staff's findings, conclusions, and recommendations regarding the allegations contained in a 45-day citizen action letter (complaint) filed on October 18, 2013, by Mike Estes against Saving Whatcom County dba Save Whatcom (Save Whatcom), PDC Case No. 14-004, and Whatcom First, PDC Case No. 14-005, two affiliated political committees that participated in Whatcom County elections in 2013. The complaint was filed with the Washington Attorney General's Office (AGO) electronically on October 18, 2013 and by U.S. mail on October 21, 2013, and referred to the Public Disclosure Commission (PDC) for investigation and possible action.

Allegations

The complaint alleged that Save Whatcom and Whatcom First violated RCW 42.17A.235 and .240 by failing to timely file Cash Receipts Monetary Contributions reports (C-3 reports) and Campaign Summary Receipts & Expenditures reports (C-4 reports) disclosing contribution and expenditure activities undertaken by the two committees. The complaint further alleges that save Whatcom failed to file some of its reports electronically as required by RCW 42.17A.245.

Applicable Statutes

RCW 42.17A.235 states that **RCW 42.17A.240** requires political committees, including bona fide political party committees, to timely and accurately file reports of contributions and expenditures. 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. C-4 reports are also required 21 and 7 days before each election, and in the month following the election, regardless of the level of activity. Contribution deposits made during this same time period must be disclosed on C-3 reports on the Monday following the date of deposit.

RCW 42.17A.245 requires newly registered political committees that expect to expend five thousand dollars or more in the current year to file all contribution reports and expenditure reports required by this chapter by the electronic alternative provided by the commission under RCW 42.17A.055.

Investigative Findings (Background)

On August 13, 2013, Save Whatcom registered with the PDC as a first-time political committee participating in the 2013 elections. On September 16, 2013, Save Whatcom registered Whatcom First with the PDC to pay for communication expenses associated

with Save Whatcom's local campaign messaging. Save Whatcom and Whatcom First stated they are affiliated with each other. They share a post office box and use the same treasurer, Orphalee Smith. Both committees stated they were created to encourage jobs and business growth in Whatcom County, and that any future ongoing programs are still being developed. During the 2013 elections, the two committees supported candidates for Whatcom County Council and the Port of Bellingham. Both committees initially paper-filed their reports. On October 14, Save Whatcom began filing electronically, and both committees filed electronically starting in mid-October.

Investigative Findings (Save Whatcom)

C-4 reports (Two late reports)

On October 15, 2013, Save Whatcom filed its initial C-4 report for August 2013 covering the period August 1 through August 31, 2013, disclosing the receipt of \$5,000 in monetary contributions and \$1,932 in in-kind contributions. No monetary expenditures were reported. The August 2013 C-4 report was required to be filed by September 10, 2013, and was filed 35 days late.

On October 21, 2013, Save Whatcom filed its 21-day pre-general election C-4 report covering the period September 1 through October 14, 2013, disclosing the receipt of \$151,248 in monetary contributions, three monetary expenditures totaling \$154,802, and in-kind contributions totaling \$4,343. Its most significant expenditure was a \$154,000 monetary contribution to Whatcom First made on October 14, 2013. The 21-day pre-general election C-4 report was required to be filed by October 15, 2013, and was filed six days late. On October 29, 2013, Save Whatcom timely filed its 7-day pre-general election C-4 report.

C-3 reports (7 late reports)

Save Whatcom filed a total of 24 C-3 reports during the 2013 election, disclosing the receipt of \$163,735 in monetary contributions. Save Whatcom filed seven of its 24 C-3 reports between three and 28 days late, disclosing \$151,525 in contributions received. The seven late-filed C-3 reports included:

- A September 23, 2013, paper-filed C-3 report disclosing a \$5,000 contribution from an individual who later became the Whatcom First campaign manager/media consultant, received and deposited on August 23, 2013 (28 days late).
- An October 17, 2013, electronically-filed C-3 report disclosing a \$12,000 contribution from SSA Marine, Inc. (3 days late).

- An October 17, 2013, electronically-filed C-3 report disclosing two \$50,000 contributions from Cloud Peak Energy, a coal mining and energy company headquartered in Wyoming, and Global Coal Sales, operating out of Columbus, Ohio. (3 days late).
- An October 17, 2013, electronically-filed C-3 report disclosing six contributions totaling \$33,150, including two \$16,000 contributions from Corbin and Barbara Robertson, a couple from Houston, Texas (an Executive of Quintana Minerals Corporation) (3 days late).
- Three paper-filed C-3 reports disclosing 13 contributions totaling \$1,375 (7-24 days late).

Failure to File Electronically

On August 23, 2013, Save Whatcom received and deposited a \$5,000 contribution from Richard Donahue. Save Whatcom expected to use this contribution to make expenditures in 2013, and was therefore required to electronically file a C-3 report disclosing this contribution on August 26, 2013. The committee filed the C-3 report electronically 49 days late on October 14, 2013. In addition, Save Whatcom was late in electronically filing, or failed to electronically file, the following C-3 reports:

- A C-3 totaling \$775 was due September 16th and was electronically-filed 31 days late on October 17th;
- A C-3 totaling \$400 was due September 16th and was electronically-filed 31 days late on October 17th;
- A C-3 totaling \$1,623.45 was due September 23rd and was electronically-filed 24 days late on October 17th;
- A C-3 totaling \$1,575 was due September 23rd and was electronically-filed 24 days late on October 17th;
- A C-3 totaling \$1,000 was due October 7th and was electronically-filed 10 days late on October 17th; and
- A C-3 report totaling \$525 was due October 14th and was not filed electronically.

Investigative Findings (Whatcom First)

Whatcom First's only activities during the 2013 general election were to make independent expenditures supporting or opposing Whatcom County Council and Port of Bellingham candidates. On October 14 and October 28, 2013, Whatcom First received \$154,000 and \$5,000, respectively, from Save Whatcom.

Whatcom First filed 21 reports of Independent Expenditures and Electioneering Communications (C-6 reports) disclosing \$151,305 in independent expenditure activities, the majority of which was spent on four Whatcom County Council races. Whatcom First filed 108 amended C-6 reports.

C-4 reports (2 late reports)

21-day pre-general election C-4 report - On October 17, 2013, Whatcom First electronically-filed its initial C-4 report covering the period September 1 through October 15, 2013, disclosing the receipt of \$154,190 in monetary contributions, no in-kind contributions, no monetary expenditures, and no outstanding orders-placed, debts or obligations. The 21-day pre-general election C-4 report was filed two days late.

On November 3, 2013, two days before the general election, Whatcom First amended its 21-day pre-general election C-4 report and added \$5,442 in new, previously unreported monetary expenditures, and \$11,839 in previously unreported orders placed. The \$5,442 in new expenditures were all made on October 15, 2013, and included expenditures for mailing services and newspaper advertising. The \$11,839 in previously unreported orders placed were for printing 100,000 brochures, 19,600 postcards for newspaper inserts, campaign signs, and committee remittance envelopes. The \$17,281 in previously unreported expenditures were disclosed 19 days late.

7-day pre-general election C-4 report - On October 29, 2013, Whatcom First timely filed its 7-day pre-general election C-4 report. However, the report did not include any orders placed, debts or obligations on Schedule B. On November 10, 2013, Whatcom First amended the report to include \$9,380 in orders placed, debts and obligations. These expenditures, for flyer inserts, printing of mail pieces, and postage, were filed 12 days late and seven days after the general election.

The late-reported expenditures and orders placed on the 21-day and 7-day pre-general election C-4 reports totaled \$26,661. \$17,281 was disclosed 19 days late, and \$9,380 was disclosed 12 days late, representing 17.8 percent of Whatcom First's total campaign expenditures through October 29, 2013.

C-3 reports (1 late report)

Whatcom First filed six original C-3 reports during the 2013 election. Five of the six reports were filed timely, disclosing \$159,000 in contributions. One report was filed seven days late, disclosing \$190. The treasurer stated that the bank deposit for the late-filed C-3 report was made by another member of Whatcom First, and she was not aware of the deposit until after it had already been made.

Conclusion

Save Whatcom – Save Whatcom was a new political committee participating for the first time in elections in 2013. It concentrated its efforts on the Whatcom County Council races in closely watched elections. Save Whatcom raised \$168,686 and spent \$163,981 by contributing to Whatcom First, an affiliated committee that spent the money on independent expenditures in those same Whatcom County Council races and Port of Bellingham races. Save Whatcom had received more than \$5,000 in contributions by the end of August, but did not begin filing electronically until October 14th when it began receiving much larger contributions. Save Whatcom filed two of its three C-4 reports late. The two late-filed C-4 reports included \$1,932 in in-kind contributions, reported 35 days late on October 15, 2013, and \$154,802 in monetary expenditures and \$4,343 in in-kind contributions received, filed six days late on October 21, 2013. Save Whatcom filed seven of 24 C-3 reports between three and 28 days late, disclosing \$151,525 in contributions received. Given the profile of the election, and the short time-frame in which Save Whatcom operated, the late-filed C-4 and C-3 reports warrant enforcement action.

Whatcom First - Whatcom First raised \$159,615, spent \$140,437, and had \$9,380 in orders placed, debts and obligations as of October 29, 2013. It received its funding from Save Whatcom, and spent its money on Whatcom County Council and Port of Bellingham races. Whatcom First amended its 21-day pre-general election C-4 report on November 3, 2013, disclosing \$17,281 in previously unreported expenditures, 19 days late. Whatcom First initially filed its 7-day pre-general election C-4 report timely on October 29, 2013. However, that report did not include any orders placed, debts, or obligations. On November 10, 2013, Whatcom First amended its 7-day pre-general election C-4 report to include \$9,380 in previously unreported orders placed, debts and obligations. Given the profile of the election, and the short time-frame in which Whatcom First operated, the late-filed C-4 reports warrant enforcement action.

Recommendation

Save Whatcom - Based on the Commission's actions concerning the separate enforcement action brought by staff against Save Whatcom for its late reporting, PDC staff recommends that the Commission:

- 1) Conduct enforcement as noted in the separately filed Notice of Administrative Charges, find violations as noted in the charges and assess an appropriate penalty; and
- 2) Recommend to the Attorney General that no further action be taken.

Whatcom First - Based on the Commission's actions concerning the separate enforcement action brought by staff against Whatcom First for its late reporting, PDC staff recommends that the Commission:

- 1) Conduct enforcement as noted in the separately filed Notice of Administrative Charges, find violations as noted in the charges and assess an appropriate penalty;
- 2) Recommend to the Attorney General that no further action be taken.



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In the Matter of Enforcement
Action Against

Whatcom First

Respondent.

PDC Case No. 14-005

Notice of Administrative Charges

I. Jurisdiction

1. The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the Public Disclosure Act; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

II. Allegations

2. Staff alleges that Whatcom First violated RCW 42.17A.235 and 42.17A.240 by failing to timely and accurately file the 21-day and 7-day Pre-general election Campaign Summary Receipts & Expenditures reports (C-4 reports) and Cash Receipts Monetary Contributions reports (C-3 reports) disclosing contribution and expenditure activities undertaken during the 2013 election.

III. Facts

3. On September 16, 2013, Whatcom First filed a Committee Registration (C-1pc report) registering with the PDC as an "Other Political Committee" disclosing that Whatcom First was affiliated with Save Whatcom.

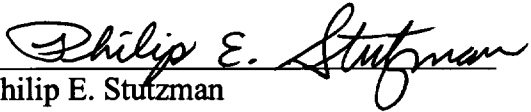
Incomplete/Late 21-day and 7-day Pre-general election C-4 Reports (RCW 42.17A.235 and 42.17A.240)

4. Whatcom First's 21 and 7-day pre-general election C-4 reports were incomplete when initially filed. The amended reports were filed 19 and 12 days late, as follows:
 - 21-day C-4: On October 17, 2013, Whatcom First timely filed its initial C-4 report covering the period September 1 through October 15, 2013, and disclosing \$154,190 in monetary contributions received. This report also served as its 21-day pre-general election report. On November 3, 2013, two days before the general election, Whatcom First amended its 21-day pre-general election C-4 report and added \$5,442 in new, previously unreported monetary expenditures, and \$11,839 in previously unreported orders placed. The \$5,442 in new expenditures were all made on October 15, 2013, and included expenditures for mailing services and newspaper advertising. The \$11,839 in previously unreported orders placed were for printing 100,000 brochures, 19,600 postcards for newspaper inserts, campaign signs, and committee remittance envelopes. The \$17,281 in previously unreported expenditures were disclosed 19 days late.
 - 7-day C-4: On October 29, 2013, Whatcom First timely filed its 7-day pre-general election C-4 report. However, the report did not include any orders placed, debts or obligations on Schedule B. On November 10, 2013, Whatcom First amended the report to include \$9,380 in orders placed, debts and obligations. These expenditures, for flyer inserts, printing of mail pieces, and postage, were filed 12 days late and seven days after the general election.
5. The late-reported expenditures and orders placed on the 21-day and 7-day pre-general election C-4 reports totaled \$26,661. Of that total, \$17,281 was disclosed 19 days late, and \$9,380 was disclosed 12 days late, representing 17.8 percent of Whatcom First's total campaign expenditures through October 29, 2013.

IV. Law

RCW 42.17A.235 and **RCW 42.17A.240** require political committees to file timely, accurate reports of contributions and expenditures. 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, and 21 and 7 days before each election, regardless of the level of activity.

RESPECTFULLY SUBMITTED this 25th day of November, 2013.



Philip E. Stutzman
Director of Compliance



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17A

Whatcom First

Respondent.

PDC Case No. 14-005

Report of Investigation

I.

Background

- 1.1 On August 13, 2013, Saving Whatcom County dba Save Whatcom (Save Whatcom) filed a Committee Registration (C-1pc report) as a first-time political committee participating in the 2013 elections. Save Whatcom registered with the Public Disclosure Commission (PDC) as an "Other Political Committee" and selected the Full Reporting option. The C-1pc indicated that Save Whatcom registered as a continuing political committee.
- 1.2 On September 16, 2013, Whatcom First filed a C-1pc report as a first-time political committee participating in the 2013 elections. Whatcom First also registered with the PDC as an "Other Political Committee" and selected the Full Reporting option. The C-1pc disclosed Whatcom First registered as a continuing political committee, and that Whatcom First was affiliated with Save Whatcom.
- 1.3 Whatcom First and Save Whatcom both have: (1) The same post office box; (2) Committee bank accounts at the same bank; (3) The same contact information for the records inspection period; and (4) The same treasurer, Orphalee Smith. Ms. Smith is a CPA. She indicated on the C-1pc that she performs only ministerial functions for Save Whatcom, and functions in addition to ministerial functions for Whatcom First.
- 1.4 On October 21, 2013, the Attorney General's Office (AGO) received a 45-day citizen action letter (complaint) in accordance with RCW 42.17A.765(4) from Mike Estes against Save Whatcom and Whatcom First. The complaint alleged that both committees were violating PDC laws by failing to report committee contribution and expenditure activities.

Allegations

- 2.1 The complaint alleged that Save Whatcom and Whatcom First violated RCW 42.17A.235 and .240 by failing to timely file Cash Receipts Monetary Contributions reports (C-3 reports) and Campaign Summary Receipts & Expenditures reports (C-4 reports) disclosing contribution and expenditure activities undertaken by the two committees, and that Save Whatcom failed to file its reports electronically. **(Exhibit #1)**
- 2.2 This report addresses the allegations against Respondent Whatcom First. The allegations concerning Respondent Save Whatcom were investigated under PDC Case No 14-004.

III. Findings

- 3.1 Political committees under the Full Reporting option that registered with the PDC after the 2013 primary election, and participated only in the 2013 general election, were required to file C-3 reports weekly once a C-1pc was filed. For Whatcom First, the weekly C-3 reporting requirement began on September 16, 2013. Whatcom First was also required to file the following C-4 reports:
 - A 21-day pre-general election C-4 report due on October 15, 2013, covering the period September 16 through October 14, 2013;
 - A 7-day pre-general election C-4 report due on October 29, 2013, covering the period October 15 through 28, 2013; and
 - A post-general election C-4 report by December 10, 2013, covering the period October 29 through November 30, 2013.
- 3.2 On November 4, 2013, Chet Dow, Secretary for Whatcom First, submitted a two-page response letter on behalf of Whatcom First and Save Whatcom. **(Exhibit #2)**
- 3.3 On November 18, 2013, Mr. Dow submitted an email in response to staff's November 14, 2013 request for additional information concerning Save Whatcom and Whatcom First. **(Exhibit #3)** Mr. Dow stated in the email:
 - Save Whatcom *"grew out of an informal, ad-hoc group of like-minded individuals."*
 - On August 5, 2013, the officers and principal decision makers of Save Whatcom first met and discussed their *"...mutual interests in forming an ongoing, locally-focused, independent political committee."*
 - On August 8, 2013, the group met and decided to form a political committee named Save Whatcom.
 - On Friday, August 9, 2013, the three individuals serving as officers of Save Whatcom executed a resolution documenting these actions and enabling the committee Treasurer to take necessary steps to make Save Whatcom operational.

- There were no Articles of Incorporation.
 - On August 13, 2013, Save Whatcom registered with the PDC after a single bank account was established for Save Whatcom. There continues to be only one bank account.
 - The C-1pc indicated that Save Whatcom was designated as a “*continuing political committee*,” and that Save Whatcom would continue to pursue its mission for an indefinite time-period beyond the 2013 election cycle.
 - Local lobbying and fundraising to support such efforts are among possible future activities for Save Whatcom, but details of any future plans for ongoing programs are still being developed.
- 3.4 Mr. Dow stated that Save Whatcom was created to encourage jobs and business growth in Whatcom County. He said future ongoing programs are still being developed. He said Save Whatcom committee members:
- “...made the decision that it needed to support 2013 candidates for local government office that shared the same principles....It was suggested that we set up a related PAC to handle just the election activity expenses and thereby simplifying reporting and distinguishing the separate mission...”*
- 3.5 Concerning Whatcom First, Mr. Dow said there are no paid staff or committee members and no committee headquarters. He stated the post office box was paid for by the treasurer, Orphalee Smith, and is shared by Whatcom First and Save Whatcom. He said all Whatcom First committee officers and members are volunteers who use their own computers, phones, vehicles, etc. when conducting committee activities. He went on to state:
- “...After review of our records, we realize we missed some orders and expenditures that should have been reported on the C-4. These errors are largely due to our not recognizing that we had to report order dates and not just paid dates on our C-4’s...”*
- 3.6 Mr. Dow stated that after consulting with PDC staff, Save Whatcom registered Whatcom First with the PDC “*...to pay for communication expenses associated with Save Whatcom’s local campaign messaging*.” He stated that since they set up Save Whatcom as a continuing political committee, they decided to set up Whatcom First similarly “*...with the intention to continue activity as long as circumstances warranted.*”
- 3.7 Mr. Dow said that was why Whatcom First did not check the box on the C-1pc indicating they were a single election political committee. If Whatcom First had registered as a single election committee, they would have been required to attach a list of candidates they intended to support or oppose. Mr. Dow stated that Whatcom First adopted an authorizing resolution on September 6, 2013.

- 3.8 Staff found that Whatcom First's only activities were to undertake independent expenditures during the 2013 general election. During the period October 14 through November 10, 2013, Whatcom First received two contributions totaling \$159,000 from Save Whatcom (\$154,000 on October 14, 2013 and \$5,000 on October 28, 2013) and filed 21 Independent Expenditures and Electioneering Communications reports (C-6 reports) and 108 amended C-6 reports disclosing \$151,305 in independent expenditure activities. **(Exhibit #4)**
- 3.9 Whatcom First checked Box No. 2 on its C-6 reports filed for "Independent Expenditure Ads (Appearing within 21-days of an election) - \$1,000 or more." The C-6 reports disclosed Whatcom First made numerous independent expenditures, of which 99 percent supported or opposed eight candidates for four Whatcom County Council races as detailed below. Whatcom First also made several small independent expenditures totaling \$1,563 that supported or opposed four candidates seeking two offices for the Port of Bellingham.

Whatcom County Council, District No. 1: \$35,645 in total independent expenditures

- Kathleen Kershner, Whatcom County Council: Whatcom First spent a total of \$22,303 for independent expenditures in support of Ms. Kershner.
- Barry Buchanan, Whatcom County Council: Whatcom First spent a total of \$13,342 for independent expenditures in opposition to Mr. Buchanan.

Whatcom County Council, District No. 2: \$35,681 in total independent expenditures

- Ben Elenbaas, Whatcom County Council: Whatcom First spent a total \$22,281 for independent expenditures in support of Mr. Elenbaas.
- Ken Mann, Whatcom County Council: Whatcom First spent a total of \$13,400 for independent expenditures in opposition to Mr. Mann.

Whatcom County Council, District No. 3: \$35,602 in total independent expenditures

- Michelle Luke, Whatcom County Council: Whatcom First spent a total of \$22,272 for independent expenditures in support of Ms. Luke.
- Carl Weimar, Whatcom County Council: Whatcom First spent a total of \$13,330 for independent expenditures in opposition to Mr. Weimar.

Whatcom County Council, At-Large District: \$35,742 in total independent expenditures

- William Knutzen, Whatcom County Council: Whatcom First spent a total of \$22,292 for independent expenditures in support of Mr. Knutzen.
- Rutherford Brown, Whatcom County Council: Whatcom First spent a total of \$13,450 for independent expenditures in opposition to Mr. Brown.

Findings regarding the allegation that Whatcom First failed to timely disclose committee expenditure information on the 21-day pre-general election C-4 report

- 3.10 On October 17, 2013, Whatcom First filed its initial C-4 report covering the period September 1 through October 15, 2013, disclosing \$154,190 in monetary contributions received. **(Exhibit #5)** This report, which served as the 21-day pre-general election C-4 report, was filed two days late and did not disclose any committee expenditures, in-kind contributions, or outstanding orders-placed, debts or obligations.
- 3.11 On November 3, 2013, Whatcom First filed an amended 21-day pre-general election C-4 report that included the \$154,190 in monetary contributions, as previously reported, but added \$5,442 in new, previously unreported expenditures, and \$11,839 in previously unreported orders placed. These additional expenditures and orders placed totaled \$17,281 and were reported 19 days late. **(Exhibit #6)** The 21-day pre-general election C-4 reporting period was September 1 through October 14, and by extending the reporting period by one day (to include October 15), Whatcom First reported three orders placed totaling \$5,442 as monetary expenditures on its November 3rd amended C-4 report. The late-reported expenditures totaling \$5,442 included:
- A \$4,290 expenditure to Speedy Automated Mailers for mailing services on October 15, 2013;
 - A \$567 reimbursement expenditure made to Kris Halterman for newspaper advertising on October 15, 2013; and
 - A \$585 expenditure made to the Lynden Tribune for newspaper advertising on October 15, 2013.
- 3.12 The amended 21-day Pre-general election C-4 report disclosed \$11,839 in previously unreported orders placed. These orders placed were confirmed by reviewing Whatcom First invoices provided by the Respondent. **(Exhibit #7)** The orders placed included the following:
- **September 25, 2013:** Order date listed on an invoice from Print and Copy, a Bellingham printer, for a \$9,778 order placed to print 100,000 campaign brochures. The bottom of the invoice contained the following statement: "16 boxes picked up by.... (19,600 postcards) to be inserted into the Lynden Tribune 10/4/13."
 - **September 24, 2013:** Order date listed on an invoice from Print and Copy for a \$1,658 order placed to print 30, four feet by eight feet campaign signs.
 - **September 12, 2013:** Order date listed on an invoice from Print and Copy for a \$403 order placed to print 2,000 committee remittance envelopes.
- 3.13 The combined total of \$17,281 in late-reported expenditures and orders placed were filed 19 days late, and disclosed to the public two days before the general election. The

expenditures represented 12.3 percent of Whatcom First's total campaign expenditures through October 29, 2013.

- 3.14 Orphalee Smith, treasurer for Whatcom First, stated that she believed her paper-filed 21-day pre-general election C-4 report, due October 15th, was timely filed. That paper-filed C-4 report was received two days late on October 17th and did not contain \$17,281 in monetary expenditures and orders placed.
- 3.15 An invoice from Print and Copy showed that on September 12, 2013, Whatcom First placed an order for \$403 to print 2,000 committee remittance envelopes. Therefore, Whatcom First was required to file a C-4 report with its C-1pc, covering the period September 12 through 16, 2013.
- 3.16 On October 29, 2013, Whatcom First timely filed its 7-day pre-general election C-4 report. The report did not include any orders placed, debts or obligations on Schedule B. On November 10, 2013, Whatcom First amended its 7-day pre-general election C-4 report to include \$9,380 in orders placed, debts and obligations. The expenditures were for flyer inserts, printing of mail pieces, and postage. The orders placed, debts and obligations were filed 12 days late and seven days after the general election. **(Exhibit #8)**

Findings regarding the allegation that Whatcom First failed to timely file C-3 reports

- 3.17 Whatcom First filed eight C-3 reports during the 2013 election, which included six original reports and two amendments. The first two C-3 reports were paper-filed. Once the committee began filing its reports electronically on October 17, 2013, it amended its two paper-filed C-3 reports and filed its remaining four C-3 reports electronically. Five of the six original C-3 reports were timely filed, including two reports totaling \$159,000, disclosing the contributions received from Save Whatcom (\$154,000 on October 14, 2013 and \$5,000 on October 28, 2013). One C-3 report was filed late. It was paper-filed seven days late on September 30, 2013. It included \$190 in contributions, made up of two \$50 contributions from individuals and nine small contributions of \$25 or less, totaling \$90. Ms. Smith stated that the bank deposit for the late-filed C-3 report was made by another member of Whatcom First, and she was not aware of the deposit until after it had already been made. **(Exhibit #9)**
- 3.18 Ms. Smith also stated that *"The errors made were not meant in any way to mislead the public. These errors and omissions were the result of me not being as well informed as to the new rules since I had last served as a Treasurer. In no way was it my or the committee's intention to mislead anybody about the sources of our financial support. The two committees were formed in mid-August and activity began immediately; consequently there was not time to establish procedures."*
- 3.19 On October 29, 2013, Whatcom First timely filed its 7-day pre-general election C-4 report covering the period October 16 through 29, 2013, disclosing \$5,425 in new monetary contributions received (\$159,615 in total contributions), and \$134,994 in new expenditures made (\$140,436 in total expenditures). The C-4 report did not contain a checkmark in the appropriate box to indicate that the report included independent expenditures.

3.20 Staff asked Whatcom First why it did not check the box on its C-4 reports to indicate that the report included independent expenditures. In response, Mr. Dow stated that “...*Our treasurer did not see that part of the C-4 form and already believed all independent expenditures were disclosed on C-6 forms. The committee will amend the appropriate C-4's to be more accurate.*” He stated that in addition, Whatcom First would allocate “*the fair market value of Ms. Smith's services*” and report it as an in-kind contribution along with an allocated portion of the post office box rental.

IV. Scope

4.1 PDC staff reviewed the 45-day citizen action letter filed by Mike Estes against Save Whatcom and Whatcom First on October 2, 2013.

4.2 PDC Staff reviewed the following:


- A November 4, 2013, response letter from Chester Dow addressing the allegations in the complaint against Save Whatcom and Whatcom First.
- A November 18, 2013, email from Mr. Dow in response to staff's request for additional information concerning Save Whatcom and Whatcom First.
- An October 28, 2013 response letter from Orphalee Smith on behalf of Save Whatcom and Whatcom First.
- Information, including queries of the PDC database, on the PDC website, concerning campaign finance reports filed by Save Whatcom and Whatcom First.

V. Laws

5.1 **RCW 42.17A.235 and .240** require political committees to file timely, accurate reports of contributions and expenditures, including independent expenditures, orders-placed, debts or obligations. Political committees under the full reporting option are required to file C-4 reports 21 and 7 days before the general election, and a post-election C-4 report in the month following the election, regardless of the level of contribution or expenditure activities.

5.2 **RCW 42.17A.245** requires newly registered political committees that expect to expend five thousand dollars or more in the current year shall file all contribution reports and expenditure reports required by this chapter by the electronic alternative provided by the commission under RCW 42.17A.055.

Respectfully submitted this 25th day of November, 2013.


Kurt Young
Compliance Officer

List of Exhibits

- Exhibit #1** 45-day citizen action letter filed by Mike Estes against Save Whatcom and Whatcom First.
- Exhibit #2** November 4, 2013, two-page response letter from Chet Dow submitted on behalf of Save Whatcom and Whatcom First.
- Exhibit #3** November 18, 2013, two-page response email from Mr. Dow submitted on behalf of Save Whatcom and Whatcom First.
- Exhibit #4** November 10, 2013 C-6 report filed by Whatcom First disclosing the total independent expenditures undertaken for 2013.
- Exhibit #5** 21-day pre-general election C-4 report filed October 17, 2013 by Whatcom First.
- Exhibit #6** Amended 21-day pre-general election C-4 report filed November 3, 2013 by Whatcom First.
- Exhibit #7** Invoices of Whatcom First provided by Mr. Dow on November 4, 2013.
- Exhibit #8** Amended 7-day pre-general election C-4 report filed November 10, 2013 by Whatcom First.
- Exhibit #9** September 30, 2013 C-3 report filed by Whatcom First.

RECEIVED

OCT 21 2013

Mike Estes
210 Texas St
Bellingham, WA 98225

RECEIVED
OSS

Public Disclosure Commission

2013 OCT 21 P 1: 26

Honorable Bob Ferguson
Attorney General of Washington
1125 Washington Street SE
PO Box 40100
Olympia, WA 98501

ATTORNEY GENERAL
OF
WASHINGTON

RE: 45-day Citizen Action Letter, pursuant to RCW 42.17A.765(A)
Saving Whatcom Co dba Save Whatcom & Whatcom First

Dear Attorney General Ferguson:

This letter concerns two recently created Political Action Committees, Saving Whatcom Co and Whatcom First.

I am writing this letter pursuant to the citizen action provisions detailed in RCW.17A.765(A) to inform you that I have reason to believe that both of these organizations have willfully and purposefully with malice hid contributions and expenditures from the public, totaling more than \$154,000.

By analyzing the Public Disclosure reports, I have reason to believe that these two political action committees have violated at least 12 instances of RCW 42.17A and WAC 390. Both committees share the same treasurer and on the C1PC form of Whatcom First, filed on 10/17/2013, it delineates that these two committees are affiliated.

I believe these violations are intended to illegally skirt compliant and reporting requirements and illegally impact elections up here in Whatcom County.

1 Violation of RCW 42.17a.240 - Missing or Unreported Money – to the tune of at least \$154,000

- On 10/14/2013, Whatcom First reported receiving a contribution from Saving Whatcom Co in the amount of \$154,000. However, no C4 report was ever filed (due on 10/15/2013) showing this as an expenditure on the C4 report of Saving Whatcom. In fact, no expenditure reports appear to exist at all for this organization that show raising funds in excess of \$162,055.45 (as of 10/18 via Search Database)

9 Violations of RCW 42.17a.235 – Missing or Consistently Late Reports

Starting June 1, 2013, C3s are due every Monday (except on bank holidays) for the previous seven days of deposits. Nearly every single C3 for Saving Whatcom Co is egregiously late, depriving the public of timely and accurate information as it relates to elections. Nearly every C3 for Whatcom First is also late.

PDC Exhibit # 1
Page 1 of 2

OCT 21 2013

- 8/23 Saving Whatcom Deposit for \$5000 from Richard Donahue. C3 was deposited with the Public Disclosure Commission Monday, August 26th. The non-electronically filed C3 was originally filed with the PDC on 9/23, 29 days late.
- 9/12 Saving Whatcom Deposit for \$300 (originally filed PDC as non-electronically filed C3) was received on 9/23 and was due on 9/16, 7 days late.
- 9/9 Saving Whatcom deposit for \$100 – was originally on a C3 with a deposit date of 9/12, then was re-filed electronically with a deposit date of 9/9 but was received by the PDC on 10/17. Depending on which deposit date you believe, this report is either 7 days late or is 31 days late.
- 9/12 Saving Whatcom deposit for \$775 – was originally filed non-electronically with a deposit date of 9/10 but then was re-filed electronically with a deposit date of 9/12. The original report was received on 9/23 and the electronically filed report was filed on 10/17, so depending on which deposit date you believe, the report is either 4 or 6 days late.
- 9/16 Saving Whatcom deposit of \$200 was filed electronically on 10/16, but was due to the PDC on 9/23 or 23 days late.
- 10/9 Saving Whatcom deposit of \$12,000 from SSA Marine was due on 10/15 but was filed on 10/17, two days late.
- 10/10 Saving Whatcom deposit of \$100,000 from Cloud Peak and Global Coal Sales was due on 10/15 but was filed on 10/17, two days late.
- 10/11 Saving Whatcom deposit for \$33,150 was due on 10/15 but was filed on 10/17, two days late.
- 9/17 Whatcom First deposit for \$190 was due on 9/23 but wasn't received by the PDC until 9/30, seven days late.

2 Violations of RCW 42.17a.240 and 17a.235(7) – Certifying Misleading Information

On two occasions Saving Whatcom certified reports that they knew were misleading, a violation of RCW 42.17a.240 in each instance. Original non-electronic reports that were filed by the committee had different deposit dates or deposit totals on both 9/10 (or 9/12) deposit of \$775 (electronic confirmation #100548884) and the 9/12 (or 9/9) C3 deposit of \$300 (or \$400).

There appear to be other violations such as the 10/7 Saving Whatcom deposit of \$525 which was never filed electronically or the nearly month lag time between filing the non-electronic reports (which again were filed very late in the first place) and the electronic reports – nearly an additional month later.

With such a large sum of money involved and critical races hanging in the balance in Whatcom County, I respectfully ask that the Attorney General give this citizen action letter its highest priority. These PACs need to stop their illegal behavior and cease activity until they comply with the law.

Sincerely,



Mike Estes

PDC Exhibit # 1
Page 2 of 2

November 1, 2013

Mr. Phillip E. Stutzman, Director of Compliance
Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

RECEIVED

2013 NOV -4 AM 11:02

PUBLIC DISCLOSURE COMMISSION

Subject: Request for additional Information (T14-004)

Dear Mr. Stutzman:

I am responding to your letter of October 24th, 2013 seeking further information about Whatcom First. Your questions mostly surround the general creation of our organization and its relationship with Saving Whatcom dba Save Whatcom, and I will address these first before your specific questions about the C-4.

Saving Whatcom was created to encourage jobs and business growth in Whatcom County by promoting sound economic policies, equitable taxation and protection of property rights through a variety of methods and mediums. Ongoing programming, political and otherwise, was and still is, under development.

Saving Whatcom made the decision that it needed to support 2013 candidates for local government office that shared the same principles. As a new organization, we had great uncertainty about how to properly disclose any activity and any expenditures, independent or otherwise, used to influence these specific elections. It was suggested that we set up a related PAC to handle just the election activity expenses thereby simplifying reporting, and distinguishing the separate mission, and we began to explore this possibility under condition that Save Whatcom could contribute to that effort.

On August 29th, Save Whatcom Chair Kris Halterman confirmed with PDC staffer Jennifer Hansen over the phone that the proposed structure and capabilities of a second political committee to be called Whatcom First was within the law as was the link to Saving Whatcom. Ms. Hansen instructed Ms. Halterman that all advertising should feature the following disclaimer "Paid for by Whatcom First, sponsored by SAVEWhatcom." That action confirmed the intent to form Whatcom First and a C1pc was filed September 12, 2013.

As a new organization, Whatcom First was uncertain what level of funds it could raise to influence elections. But the committee hoped it could raise at least \$12,000 for its efforts.

Concerning the C-4 filed by Whatcom First

Q. Are there any committee overhead costs being provided to Whatcom First such as office space, paid staff, computers and equipment, consulting, etc....by Saving Whatcom County or any contributor that have not been reported as in-kind contribution? If yes please identify the in-kind contributors to Whatcom First, the nature of the services provided, the amounts for each service, and include that information on an amended 21-day pre-general election C-4 report.

A. All Whatcom First committee members are volunteers, each with their own unique knowledge, background, and concerns for Whatcom County. There is no paid staff, and all committee members simply use their own personal computers, phones, vehicles, etc. when coordinating committee business. The committee is an all-volunteer, part-time organization and has no office. When committee members or their businesses have provided any service to the committee, they have been disclosed as either in-kind contributions or reimbursed accordingly.

One possible exception has been the disclosure of Orphalee Smith's work as Treasurer and the person responsible for filing our reports with the PDC. Orphalee is a CPA donating her time to managing our books, depositing checks, and paying bills, in addition to filing our PDC reports. While she is an accountant, she does not normally deposit checks, pay bills, nor file PDC reports professionally for any clients. Given this information, the committee believes her time supporting Whatcom First does not need reporting, but we would welcome PDC input into this question.

The only other possible expense to be listed would be the P.O. Box utilized by Whatcom First as well as Saving Whatcom. Here, the P.O. Box is owned by Orphalee Smith and if there is a contribution to either committee to be reported, it would be from her to each committee. While any committee member could simply have used their home address as the address for the committee, the committee decided to use Orphalee's business address given that she was handling revenue, expenses, and PDC reporting. If the committees' share of use of this already existing and paid for P.O. Box needs to be reported, we welcome guidance on how to do so properly. The cost of this P.O. Box for one year is \$78.00

Q) Did Whatcom First place any orders prior to October 15, 2013 for the four independent expenditures that were reported on the C-6 report as having been made on October 17, 2013, to the following: (1) Speedy Automated Mailers, Inc.; (2) Point Roberts Press, Inc.; (3) Lynden Print Company; and (4) Print and Copy?

Attached are the invoices you have requested. After review of our records, we realize we missed some orders and expenditures that should have been reported on the C-4. These errors are largely due to our not recognizing that we had to report order dates and not just paid dates on our C-4's. Our treasurer has been in touch with Chip Beatty of your staff and has begun amending the appropriate reports. We will update you on this progress as soon as possible.

Thank you for the opportunity to respond.

Sincerely,

Chet Dow, Secretary
Whatcom First
P.O. Box 2980
Bellingham, WA 98227

Kurt Young

From: Chet Dow [cdow1@cablespeed.com]
Sent: Monday, November 18, 2013 2:58 PM
To: Kurt Young
Cc: Chet Dow; Orphalee Smith
Subject: PDC Case # 14-005, Save Whatcom and Whatcom First

Dear Mr. Young,

Thank you again for giving us the opportunity to respond to your email of Thursday, November 14.

- What date was Save Whatcom created, was it the same day as the PAC registration or earlier? Please explain. Was there any formal paperwork filed such as Articles of incorporation, or was it more of an ad-hoc committee made up of like minded individuals? Is there a separate bank account for a non-PAC entity called Saving Whatcom, or is there only one bank account?

Save Whatcom grew out of an informal, ad-hoc group of like-minded individuals that first gathered on August 5, 2013 to discuss mutual interests in forming an ongoing, locally-focused, independent political committee. On August 8, 2013, the group again met and unanimously resolved to form a committee named Saving Whatcom County, dba Save Whatcom. On Friday, August 9, 2013, the three officers executed the Saving Whatcom County financial authorization resolution documenting these actions and enabling the Treasurer to take necessary steps to make Save Whatcom operational. There were no Articles of Incorporation filed, but registration with the Public Disclosure Commission would take place on August 13, 2013 after a single bank account was established for Save Whatcom. There continues to be only one bank account.

- You referenced ongoing programs being under development for Save Whatcom, what other activities has Save Whatcom engaged in or is planning on engaging in (i.e.- local lobbying; state lobbying; other activities)? Is Save Whatcom going to be a continuing political committee in the future?

At the time our group decided to form Save Whatcom, we agreed to designate the PAC as a "continuing political committee" when filing the Form C-1pc with the PDC. This was in anticipation that Save Whatcom would continue to pursue our mission of encouraging economic and job growth in Whatcom County for an indefinite time period, extending beyond the current election cycle. Local issue-oriented lobbying and fundraising to support such efforts are among possible future activities we saw, but details of any future plans remain to be developed at this time.

- How about Whatcom First?

After consulting PDC staff, the Save Whatcom committee set up Whatcom First to pay for communication expenses associated with Save Whatcom's local campaign messaging. Since Save Whatcom had been set up as a continuing political committee, Whatcom First was set up similarly with the intention to continue activity as long as circumstances warranted. Whatcom First adopted its own financial authorization resolution September 6, 2013.

- On the C-1pc filed by Whatcom First under the Other Political Committee box, there is a section for single election-year only committees. The form asks if the committee is supporting or opposing candidates, and then states to attach a list of candidates. I could not find that you answered that question, or attached the required information. Please explain if you were aware of that reporting requirement.

Whatcom First filed as a continuing committee and as such did not fill out this section.

PDC Exhibit # 3
Page 1 of 2

- On the C-4 report, there is an area to the right of the Zip +4 and Report Period Covered sections that asks if the committee made an independent expenditure during the period, but it appears that information was left blank. Please explain if you were aware of that reporting requirement.

Our treasurer did not see that part of the C-4 form and already believed all independent expenditures were disclosed on C-6 forms. The committee will amend the appropriate C-4's to be more accurate. In addition, the committee will make other adjustments based on your counsel regarding the allocation of a small post office box expense and the fair market value of Ms. Smith's services.

Sincerely,

Chet Dow

Whatcom First and Save Whatcom



Reporting Form for: (check one)

Instructions on Page 3

- INDEPENDENT EXPENDITURES (Occurring at any time) — \$100 or more
 INDEPENDENT EXPENDITURE ADS (Appearing within 21 days of an election) — \$1,000 or more
 ELECTIONEERING COMMUNICATIONS, Except Contributions (Appearing within 60 days of an election) — \$1,000 or more

1. Name and complete postal mailing address of sponsor: WHATCOM FIRST P. O. BOX 2980 BELLINGHAM, WA 98227		E-mail ORPHALEE@ORPHALEESM
		Telephone 360-671-8181

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

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
09/11/13	09/11/13	KRIS HALTERMAN 4014 CEDARBROOK COURT BELLINGHAM, WA 98229	FACEBOOK ADVERTISING	1,477.33

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

Total this report \$ 1,477.33

Amount or Value
 *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.

Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.
 \$ 151,305.38

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

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose		Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
			<input checked="" type="checkbox"/>	<input type="checkbox"/>		
KERSHNER, KATHLEEN	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 174.39	\$ 22,303.28
DUKE, MICHELLE	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 142.75	\$ 22,271.64
NUTZEN, WILLIAM	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 162.74	\$ 22,291.63
LENBAAS, BEN	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 152.83	\$ 22,281.72

Continued on attached sheet

Filer Name:

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

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

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

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

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

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature
	Printed Name ORPHALEE SMITH
	Street address P. O. BOX 2980
	City/State/Zip BELLINGHAM WA 98227
	Date Signed 11/10/13
	Place Signed (city and county) BELLINGHAM WHATCOM
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

**SUMMARY, FULL REPORT
 RECEIPTS AND
 EXPENDITURES**

C4 (3/97)	PDC OFFICE USE
	100548879
	10-17-2013

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

Whatcom First
 Mailing Address
 P. O. Box 2980
 City
 Bellingham, WA

Zip + 4 98227	Office Sought (Candidates)	Election Date 2013
Report Period Covered From (last C-4) 09/01/13	To (end of period) 10/15/13	Final Report? Yes No X

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

RECEIPTS	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)			\$ 0.00
2. Cash received (From line 2, Schedule A)	\$ 154,190.00		
3. In kind contributions received (From line 1, Schedule B).....	0.00		
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			154,190.00
5. Loan principal repayments made (From line 2, Schedule L).....	0.00		
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)	0.00		
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)			154,190.00
9. Total pledge payments due (From line 2, Schedule B).....	0.00		

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

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

CASH SUMMARY	
18. Cash on hand (Line 8 minus line 17)..... [Line 18 should equal your bank account balance(s) plus your petty cash balance.]	154,190.00
19. Liabilities: (Sum of loans and debts owed)	0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	154,190.00

Treasurer's Daytime Telephone No.:
 (360) 671-8181

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

Candidate's Signature	Date	Treasurer's Signature	Date
		Orphalee Smith	

**CAMPAIGN SUMMARY
 RECEIPTS & EXPENDITURES**

C4
 (1/12)
 PDC OFFICE USE
RECEIVED
 OCT 17 2013
 Public Disclosure Commiss

Candidate or Committee Name (Do not abbreviate. Include full name)
Whatcom First

Mailing Address City
P. O. Box 2980 Bellingham

Zip + 4 98227	Office Sought (Candidates) 11/5/13	Report Period Covered From (last C-4) To (end of period) 9/1/13	Final Report? Yes <input type="checkbox"/> No <input type="checkbox"/>	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate? *See reverse Yes <input type="checkbox"/> No <input type="checkbox"/>
-------------------------	---------------------------------------	--	---	--

RECEIPTS

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet).....	\$	0
2. Cash received (From line 2, Schedule A).....	\$	154,190.00
3. In kind contributions received (From line 1, Schedule B).....		
4. Total cash and in kind contributions received this period (Line 2 plus 3).....		154,190.00
5. Loan principal repayments made (From line 2, Schedule L).....	()	
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)		
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)		0
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7).....		154,190.00
9. Total pledge payments due (From line 2, Schedule B).....		0

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet).....	\$	0
11. Total cash expenditures (From line 4, Schedule A).....		
12. In kind expenditures (goods & services) (From line 1, Schedule B).....		
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....		
14. Loan principal repayments made (From line 2, Schedule L).....	()	
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)		
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)		
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....		154,190.00

CANDIDATES ONLY

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

Treasurer's Daytime Telephone No.:
 ()

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17).....	154,190.00
(Line 18 should equal your bank account balance(s) plus your petty cash balance.)	
19. Liabilities: (Sum of loans and debts owed).....	()
20. Balance (Surplus or deficit) (Line 18 minus line 19).....	154,190.00

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

Candidate's Signature	Date	Treasurer's Signature	Date
		<i>April Lee Amick</i>	10/15/13

SEE INSTRUCTIONS ON REVERSE

**SUMMARY, FULL REPORT
 RECEIPTS AND
 EXPENDITURES**

C4 <small>(3/97)</small>	PDC OFFICE USE
	100552141
	AMENDS
	100548879
	11-03-2013

Candidate or Committee Name (Do not abbreviate. Include full name)
Whatcom First

Mailing Address
 P. O. Box 2980

City
 Bellingham, WA

Zip + 4 98227	Office Sought (Candidates)	Election Date 2013
Report Period Covered 09/01/13	To (end of period) 10/15/13	Final Report? Yes No X

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

RECEIPTS	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		\$	0.00
2. Cash received (From line 2, Schedule A)	\$	154,190.00	
3. In kind contributions received (From line 1, Schedule B).....		0.00	
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			154,190.00
5. Loan principal repayments made (From line 2, Schedule L).....		0.00	
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)		0.00	
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)			154,190.00
9. Total pledge payments due (From line 2, Schedule B).....	0.00		

EXPENDITURES	
10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)	0.00
11. Total cash expenditures (From line 4, Schedule A)	5,442.48
12. In kind expenditures (goods & services) (From line 1, Schedule B)	0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....	5,442.48
14. Loan principal repayments made (From line 2, Schedule L).....	0.00
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)	0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....	5,442.48

CANDIDATES ONLY	Name not on ballot			
	Won	Lost	Unopposed	
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Treasurer's Daytime Telephone No.:				
(360) 671-8181				

CASH SUMMARY	
18. Cash on hand (Line 8 minus line 17)	148,747.52
<small>(Line 18 should equal your bank account balance(s) plus your petty cash balance.)</small>	
19. Liabilities: (Sum of loans and debts owed)	11,838.93
20. Balance (Surplus or deficit) (Line 18 minus line 19).....	136,908.59

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

Candidate's Signature	Date	Treasurer's Signature	Date
		Orphalee Smith	

CASH RECEIPTS AND EXPENDITURE

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

2

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

Report Date

09/01/13 10/15/13

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
09/17/2013	190.00					
10/15/2013	154,000.00					

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 154,190.00

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

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

<p>CODE DEFINITIONS ON NEXT PAGE</p>	<p>C - Contributions (monetary, in-kind & transfers) I - Independent Expenditures L - Literature, Brochures, Printing B - Broadcast Advertising (Radio, TV) N - Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.) V - Voter Signature Gathering</p>	<p>P - Postage, Mailing Permits S - Surveys and Polls F - Fundraising Event Expenses T - Travel, Accommodations, Meals M - Management/Consulting Services W - Wages, Salaries, Benefits G - General Operation and Overhead</p>
--	--	--

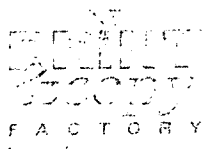
3. EXPENDITURES

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

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
10/15/13	SPEEDY AUTOMATED MAILERS P. O. Box 31877 Bellingham, WA 98227		Mailing services	4,290.48
10/15/13	KRIS HALTERMAN 4175 Meridian Street Bellingham, WA 98226		Newspaper advertising	567.00
10/15/13	LYNDEN TRIBUNE P. O. Box 153 Lynden, WA 98264		Inserts and flyers	585.00

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 0.00
Enter also on line 11 of C4 \$ 5,442.48

YOUR ORDER REFERENCE: 104681



P (360) 738-4931
3055 Irongate Road
Bellingham, WA 98226

Online
www.printcopyfactory.com

Print Copy Factory
Member of the
Whatcom Group

NO. 104681

Date: 9/12/13

R.G. #

S
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L
D
T
J
SaveWhatcom.org
Po Box 2980
Bellingham WA 98227

Kris Halterman
739-5890

printcopyfactory.com
webster | 180 | email | hosting | social media

E-mail: kshalt2013@comcast.net

2,000	Printing Remit envelopes - black ink, 3.5 x 6.25 white 24# 1-Way REMITTANCE ENVELOPE #6-1/2 (3-5/16 flap), printed 1 color front in Black ink, 1 color back in Black ink	436.32
2	Becky designed - no charge Direct-to-Plate and Processing (file#_____)	
5633	Becky	Customer Discount 65.45

Save whatcom to pay

Thank you!

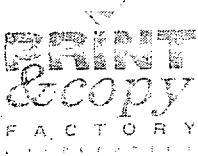
Account Type: COD	Ship Via:	SUB	370.87
		TAX	32.27
		SHIPPING	
		TOTAL	403.14

Received By: _____

PDC Exhibit # 7
Page 1 of 6



YOUR MARKETING RESOURCE CENTER



P (360) 738-4931
 F (360) 734-8204
 4055 Irongate Road
 Bellingham, WA 98226

www.printcopyfactory.com

ANNUAL AWARDS
 WINNER
 We Make the Difference

100 1 3 1 3 E

NO. **104817**

Date: 9/24/13

P.O. #

pcf **web** solutions.com
 websites | SEO | emails | hosting | social media

S
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SaveWhatcom.org
 Po Box 2980
 Bellingham WA 98227

Kris Halterman
 739-5890

E-mail: kshalt2013@comcast.net>

30	4x8 signs ++ approx 2-3 days production (price includes all of the discounts/ base rate considered) 20 single sided // 42.50 ++++++shipping from MN, takes about 4 buz days via freight because they are so big. Looking at other campaigns to see if we can gang run some and share shipping.	1,275.00 250.00
----	---	--------------------

*SAVE whatcom to pay
 product expected 1st week
 out*

5633
 Becky

Account Type: COD	Ship Via:	SUB	1,525.00
		TAX	132.68
		SHIPPING	
		TOTAL	1,657.68

Thank you!

Received By: _____

PDC Exhibit # 7
 Page 2 of 6

We appreciate your business



YOUR MARKETING RESOURCE CENTER



P (360) 738-4831
 F (360) 734-8264
 4055 Inngate Road
 Bellingham, WA 98226
Order online!
 www.printcopyfactory.com

ANNUAL AWARDS
 WINNER
 WE MAKE THE DIFFERENCE...
 We Make the Difference...

0 0 2 0 1 3

NO. **104846**

Date: 9/25/13

P.O. #

pcf **web** solutions.com
 websites | SEO | emails | hosting | social media

S
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 L
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 T
 O
 SaveWhatcom.org
 Po Box 2980
 Bellingham WA 98227

Kris Halterman
 739-5890

E-mail: kshalt2013@comcast.net>

QUANTITY	DESCRIPTION	AMOUNT
100,000	<p>QUOTE IS BASED ON standard direct mail and services - using a provided database from you.</p> <p>Postage, this is approximate cost, delivered to KENT, for special postage rates, including the delivery. Postage rates are based off the post office and are not marked up. *** POSTAGE AND PRINTING NEEDS TO BE PAID FOR IN FULL BEFORE MAILING***</p> <p>FULL COLOR BOTH SIDES 4/4, UV on FACE ONLY 14pt C1S Heavy stock, 6" x 11" with bleeds</p> <p>These prices are based on *****ONLY on a 7-10 day turn from art approval.*****</p> <ul style="list-style-type: none"> * 21,582 1. CASS Certification, reports and mail sorting 21,582 2. Move Update Service NCOA 24-mos.change of address .01 21,582 **VDP - address panel only *** POSTAGE IS NOT INCLUDED *** 	9,037.16
2:00 0:20	<p>Creative Design & Layout Services (hourly Rate \$75) - Donated 2 hours design by Becky <i>Volunteered</i></p> <p>tax not included</p> <p>*** POSTAGE NOT included *** check made out to Speedy Directly for amount of \$4290.48</p> <p>---16 boxes picked up by Delaine 961-5764 (19,600 postcards) to be inserted into the Lynden Tribune 10/4/13</p>	
5633 Becky		
Account Type: Charge Account		
Ship Via:		
		SUB 9,037.16
		TAX 740.75
		SHIPPING
		TOTAL 9,777.91

Paid 10/25/13
 1004

Thank you!

Received By: _____

PDC Exhibit # 7
 Page 3 of 6

We appreciate your business...



Lynden Tribune



Lynden Print Co.
DESIGN • PRINT • MAIL

P.O. BOX 153 • LYNDEN, WA 98264 • PHONE 360-354-4444 • FAX 360-354-4445

INVOICE

DATE: 10/10/2013
INVOICE #: 93865

TO:

Save Whatcom
c/o Dave Brumbaugh

PO NUMBER	TERMS	PROJECT
	Due on Receipt	

DESCRIPTION	RATE	AMOUNT
4.200 Inserts to go into Foothills Gazette tab	0.05	210.00
6.000 Flyers Inserted into Lynden Tribune 10/16.	0.05	300.00
1.500 Flyers inserted into Ferndale Record 10/16	0.05	75.00
Northern Light does its own billing		
<i>PK 10/17/13</i>		
<i># 1003</i>		
Total		\$585.00

Payments/Credits \$0.00

Balance Due \$585.00

PDC Exhibit # 7
Page 4 of 6

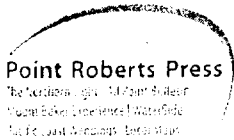
Speedy Automated Mailers Inc
 2200 Queen St Ste 14
 PO Box 31877
 Bellingham, WA 98228-3877

Invoice

Date	Invoice #
10/16/2013	20272

Print & Copy Factory
 Attn: Accounts Payable
 4055 Irongate Rd
 Bellingham, WA 98226-8028

		P.O. Number	Terms	Due Date	Rep	Account #
		PRE-MAILING	Net 30	11/15/2013	JRS	19920035
Quantity	Item Code	Description			Price Each	Amount Due
	Mailing Services	Speedy Automated Mailers Project #2071 Qty=21,582			0.00	0.00
	B. Postage	Save Whatcom Mailing Services Postage			608.24 3,682.24	608.24 3,682.24
<p><i>All paid by whatcom #100/mailling Rest</i></p>						
This invoice is prepaid. Thank you for allowing us to serve you.					Total	\$4,290.48
Phone #	Fax #	E-mail			ROA for this Invoice	-\$4,290.48
(360) 676-4775	(360) 676-5118	accounting@speedy-inc.com			Balance Due for Invoice	\$0.00



Point Roberts Press

The Northwest's Largest Outdoor Advertising Company
Specializing in Billboards, Signs, and More
10000 1st Avenue, Everett, WA 98203

225 Marine Drive Ste. 200 • Blaine, WA 98230 • 360-332-1777

Pre-Bill

Ad # 27396

Date: 10/18/2013

Terms: Net 10

Rep: JM

Bill to Account ID: 8508

Orphalee Smith
SAVEWhatcom
PO Box 2980
Bellingham, WA 98227

Sold to: Account ID: 8508

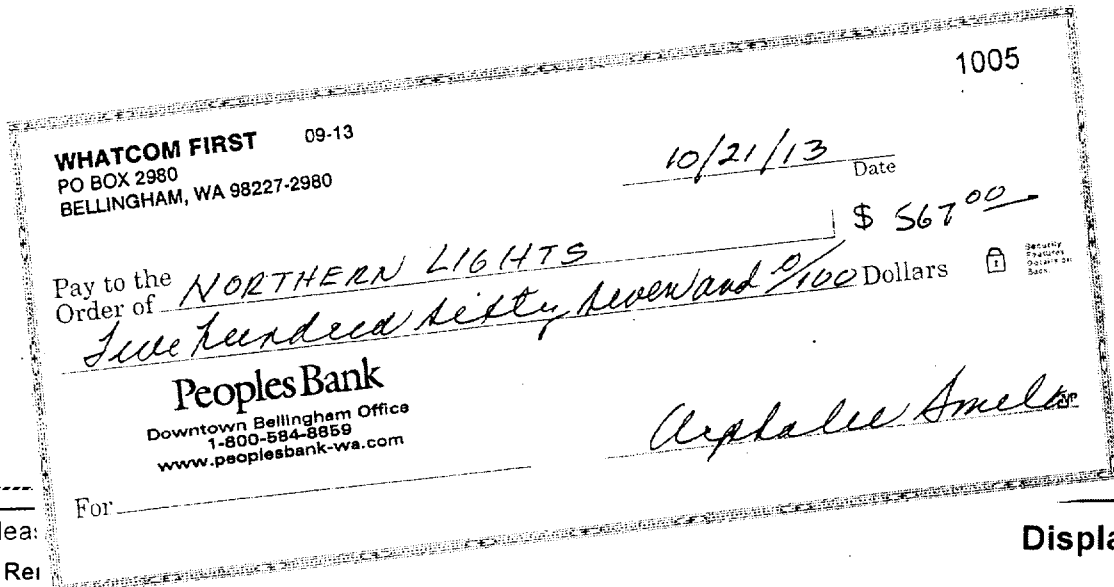
Orphalee Smith
SAVEWhatcom
PO Box 2980
Bellingham, WA 98227

Charges from 10/17/13 to 10/24/13

Date	Pub	Type	Description	Pg	Lvl	Price	Discount	Applied	Due
10/17/13	PRP	ad	TNL - Display: TNL -			\$567.00	(1)	-\$567.00	\$0.00
10/24/13	PRP	ad	TNL - Display: TNL -			\$567.00			\$567.00

*① Paid 10/17/13
1002*

\$1,134.00		-\$567.00	\$567.00
------------	--	-----------	----------



Please

Re:

Point Roberts Press Inc.
225 Marine Drive Ste. 200
Blaine, WA 98230
Fax: 360-332-2777

Orphalee Smith
SAVEWhatcom
PO Box 2980
Bellingham, WA 98227

Display Pre-Bill

Amount Due \$567.00

Amount Enclosed 567.00

Issue Date: 10/17/2013

Prebill Date: 10/18/2013

Ad # 27396

Account # 8508

PDC Exhibit # 7

14-005 Whatcom of First

**SUMMARY, FULL REPORT
 RECEIPTS AND
 EXPENDITURES**

C4
 (3-97)

PDC OFFICE USE
 100553634
 AMENDS
 100551474
 11-10-2013

Candidate or Committee Name (Do not abbreviate. Include full name)
 Whatcom First

Mailing Address
 P. O. Box 2980

City
 Bellingham, WA

Zip + 4 98227	Office Sought (Candidates)	Election Date 2013	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) <u>supporting or opposing a state or local candidate</u> ?
Report Period Covered 10/16/13	From (last C-4) To (end of period) 10/29/13	Final Report? Yes No X	

RECEIPTS

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	154,190.00
2. Cash received (From line 2, Schedule A)	\$	5,425.00
3. In kind contributions received (From line 1, Schedule B)		0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		5,425.00
5. Loan principal repayments made (From line 2, Schedule L)		0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		159,615.00
9. Total pledge payments due (From line 2, Schedule B)		0.00

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		5,442.48
11. Total cash expenditures (From line 4, Schedule A)		134,994.18
12. In kind expenditures (goods & services) (From line 1, Schedule B)		0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		134,994.18
14. Loan principal repayments made (From line 2, Schedule L)		0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		140,436.66

CANDIDATES ONLY

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

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	19,178.34
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	9,380.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	9,798.34

Treasurer's Daytime Telephone No.:
 (360) 671-8181

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

Candidate's Signature	Date	Treasurer's Signature	Date
		Orphalee Smith	

CASH RECEIPTS AND EXPENDITURE

SCHEDULE A
to C4
(11/93)

2

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

Report Date

10/16/13 10/29/13

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
10/22/2013	400.00					
10/25/2013	25.00					
10/28/2013	5,000.00					

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4: \$ 5,425.00

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

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

CODE DEFINITIONS ON NEXT PAGE	C - Contributions (monetary, in-kind & transfers) I - Independent Expenditures L - Literature, Brochures, Printing B - Broadcast Advertising (Radio, TV) N - Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.) V - Voter Signature Gathering	P - Postage, Mailing Permits S - Surveys and Polls F - Fundraising Event Expenses T - Travel, Accommodations, Meals M - Management/Consulting Services W - Wages, Salaries, Benefits G - General Operation and Overhead
-------------------------------------	---	---

3. EXPENDITURES

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

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
10/20/13	PRINT AND COPY 4055 irongate Road Bellingham, WA 98226		PRINT AND COPY, Print remit envelopes	403.14
10/20/13	PRINT AND COPY 4055 irongate Road Bellingham, WA 98226		PRINT AND COPY, 4 x 8 Signs	1,657.88
10/20/13	PRINT AND COPY 4055 irongate Road Bellingham, WA 98226		PRINT AND COPY, Printing of 4/4 on both sides	9,777.91
10/20/13	NORTHERN LIGHTS 225 Marine Drive, Ste 200 Blaine, WA 98230		Display advertising	567.00
10/20/13	BELLINGHAM HERALD 1155 N State Street Bellingham, WA 98225		Newspaper insert	816.00
10/22/13	KRIS HALTERMAN 4175 Meridian Street Bellingham, WA 98226		Facebook promotion	459.01

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ 121,313.24
Enter also on line 11 of C4 \$ 134,994.18

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

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

Report Date

10/16/13

10/29/13

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
10/22/13	PRINT AND COPY 4055 irongate Road Bellingham, WA 98226		Postage	1,682.24
10/20/13	AMPLIFIED STRATEGIES 1803 42nd Avenue East Seattle, WA 98112		Printing and production	51,905.00
10/23/13	AMPLIFIED STRATEGIES 1803 42nd Avenue East Seattle, WA 98112		Printing	21,494.00
10/23/13	AMPLIFIED STRATEGIES 1803 42nd Avenue East Seattle, WA 98112		Phone book	2,353.00
10/23/13	AMPLIFIED STRATEGIES 1803 42nd Avenue East Seattle, WA 98112		Postage	17,788.00
10/23/13	AMPLIFIED STRATEGIES 1803 42nd Avenue East Seattle, WA 98112		Production services	10,588.00
10/29/13	MEDIA PLUS 160 Roy Street Seattle, WA 98109		Radio spots and production of spots	15,503.00

Page Total \$ 121,313.24

PPC Exhibit # 8
Page 3 of 4

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE
TO C4

B
(11/93)

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

Report Date
10/16/13 10/29/13

3. ORDERS PLACED, DEBTS, OBLIGATIONS. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)

Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code OR	Description of Obligation
10/18/2013	LYNDEN TRIBUNE P. O. Box 153 Lynden, WA 98264	375.00		Flyer inserts
10/29/2013	AMPLIFIED STRATEGIES 1803 42nd Avenue East Seattle, WA 98112	534.00		Printing of mail pieces
10/29/2013	AMPLIFIED STRATEGIES 1803 42nd Avenue East Seattle, WA 98112	8471.00		Postage
TOTAL THIS PAGE		9380.00		

Page Exhibit # 8
Page 4 of 4

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/12)

THIS SPACE FOR OFFICE USE

DATE FILED PDC

SEP 30 2013

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

P. O. Box 2980

Bellingham 98227 Office Sought (candidates) 11/5/2013

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous.....	\$	\$
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L.....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation.....		
9/19/13	e. Small contributions \$25.00 or less not itemized and number of persons giving 9 (persons)	90.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
9/19/13	Elliott Fine 95 Hawthorn Road Bellingham, WA 98225				\$ 50.00	\$50.00
	Occupation					
9/19/13	Nora Fine 95 Hawthorn Road Bellingham, Wa 98225				\$50.00	50.00
	Occupation					
					\$	\$
	Occupation					
					\$	\$
	Occupation					
					\$	\$
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached				Sub-total Amount from attached pages 190.00	*See reverse for details.

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

190.00

4. Date of Deposit: **9/19/13**

Treasurer's Daytime Telephone No.: **(360) 671-8181**

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: *Alphalee Amelt* Date: **9/30/13**

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

100548875

10-17-2013

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

Mailing Address
 P. O. Box 2980

City Zip + 4 Office Sought (candidates) Election Date
 Bellingham, WA 98227 2013

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
09/12/13	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	90.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100.* Employer's Name, City and State	P R I N	G E N	Amount	Aggregate* Total
09/12/13	ELLIOTT FINE 95 Hawthorne Road Bellingham, WA 98225				50.00	50.00
	Occupation					
09/12/13	NORA FINE 95 Hawthorne Rd Bellingham, WA 98225				50.00	50.00
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			190.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

190.00

4. Date of Deposit: 09/17/13

Treasurer's Daytime Telephone No.: (360) 671-8181

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Orphalee Smith Date: 10-17-2013