



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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TO: Commissioners

FROM: Tony Perkins, Director of Compliance

DATE: October 15, 2015

SUBJECT: Cathy Dahlquist, Case No. 15-036

This case involves alleged violations of RCW 42.17A.405 by Cathy Dahlquist, a 2014 candidate for State Senator in the 31st Legislative District, for allegedly spending general election contributions for the primary election in a manner that exceeded contribution limits.

You are being provided the Notice of Administrative Charges and Report of Investigation with Exhibits. Staff is working with the Respondent on a Stipulation as to Facts.



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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In the Matter of Enforcement
Action Against

Cathy Dahlquist

Respondent.

PDC Case No. 15-036

Notice of Administrative Charges

I. JURISDICTION

The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure law; 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

PDC staff alleges that Cathy Dahlquist violated RCW 42.17A.405 by spending \$3,697.33 in general-election designated contributions for her 2014 primary election campaign for State Senator in the 31st Legislative District, in a manner that exceeded primary election limits.

III. FACTS

1. On April 14, 2014, Cathy Dahlquist filed a C-1 report registering her candidacy to seek the office of State Senator in the 31st Legislative District in the 2014 election.
2. Cathy Dahlquist was one of the top two candidates in the August 5, 2014, primary election, and appeared on the November 4, 2014 general election ballot.
3. For the 2014 election, for each election in which the candidate's name appeared on the ballot, legislative candidates were subject to a \$950 limit on contributions from

individuals, corporations, unions, and other non-individual entities other than a bona fide political party or a caucus political committee.

4. Ms. Dahlquist's 2014 campaign disclosed receipt of \$77,163 in contributions designated for, or eligible for use in, the 2014 primary election. The campaign disclosed \$87,090 in expenditures up to the date of the August 5, 2014, primary election. Expenses the campaign incurred during the primary election thus exceeded contributions eligible for use in that election.
5. In responding to a complaint filed against her campaign, Ms. Dahlquist stated that the campaign made a number of expenditures prior to the August 5, 2014 primary election to sponsor goods and services that were not used for the primary election, but were held in reserve for the general election. She stated that the expenditures were made with a mix of primary- and general-election designated contributions, and that only the portion reserved for the general election was paid with general-election designated contributions.
6. Ms. Dahlquist also described other expenditures the campaign made with both primary- and general-election designated contributions. In those instances, the goods or services purchased had a continued use during the general election, however they were not of such a nature that a portion could be "reserved" until the primary election had passed. Rather, the \$3,697.33 portion of the expenditures that was made with general-designated contributions benefited Ms. Dahlquist's primary election campaign.
7. The primary election expenses sponsored with general-election designated contributions included the following:
 - 1) \$2,809 in production costs for a broadcast ad aired during the 2014 primary and general elections. Because the entire cost of production was required for the ad to run during the primary election, the \$1,404 portion that was paid with general-election designated contributions benefited Ms. Dahlquist's primary election efforts.
 - 2) \$3,482.66 in expenses incurred in connection with two fundraising events, including food, printing and mailing of invitations, and insurance. Because the events were held

before the August 5, 2014 primary election, the \$1,741.33 portion paid from general-election designated contributions paid for Ms. Dahlquist's primary election activity.

- 3) An \$860 payment on May 13, 2014 for campaign software used to micro-target registered voters within each precinct of the legislative district for door-belling and get-out-the-vote (GOTV) activities. Although the software was used during both the primary and general election campaigns, it was fully functional during the primary election, and the \$430 portion that was paid with general-election designated contributions sponsored that functionality.
- 4) A \$150 expenditure on April 30, 2014 for a campaign website, including web-hosting fees for one year and the functionality to frequently update the website throughout the primary election. The \$75 portion of the expense that was paid from general-election designated contributions paid for that functionality during Ms. Dahlquist's primary election campaign.
- 5) A \$93 expenditure on May 29, 2014 to purchase a drill that was used throughout the 2014 campaign to construct, assemble, and repair campaign yard signs. The \$46.50 portion of the expense that was paid with general-election designated contributions paid for the use of the drill during Ms. Dahlquist's primary election campaign.

IV. LAW

Under **RCW 42.17A.405**, for the 2014 election, for each election in which the candidate's name appeared on the ballot, legislative candidates were subject to a \$950 limit on contributions from individuals, corporations, unions, and other non-individual entities other than a bona fide political party or a caucus political committee.

WAC 390-17-300(4) requires that contributions for the primary election be accounted for separately from those for the general election, such that campaign records reflect one aggregate contribution total for each contributor giving in the primary election as well as one aggregate contribution total for each contributor giving in the general election.

WAC 390-17-300(5) states that general election contributions shall not be spent for the primary election if to do so would cause the contributor of the general election contribution to exceed that contributor's contribution limit for the primary election.

RESPECTFULLY SUBMITTED this 12th day of October, 2015.



Tony Perkins
Director of Compliance



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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17 and RCW 42.17A

Cathy Dahlquist

Respondent.

PDC Case No. 15-036

Report of Investigation

I.

Background

- 1.1 On August 1, 2013, Cathy Dahlquist filed a Candidate Registration (C-1 report) declaring her candidacy for re-election to State Representative in the 31st Legislative District in 2014 and selecting the Full Reporting option.
- 1.2 On April 14, 2014, Cathy Dahlquist filed a Candidate Registration (C-1 report) declaring her candidacy for State Senator in the 31st Legislative District in 2014, selecting the Full Reporting option, and switching her candidacy to seek a different office in 2014. **Exhibit #1.**
- 1.3 Ms. Dahlquist is an incumbent State Representative from the 31st Legislative District since being elected to that office in 2010, and re-elected to that office in 2012. Prior to that, Ms. Dahlquist was a School Director representing the Enumclaw School District since being elected to that office in 2005 as a first-time candidate and re-elected in 2009.
- 1.4 Ms. Dahlquist was one of the top two candidates in the August 5, 2014, primary election, and appeared on the November 4, 2014 general election ballot.
- 1.5 On August 8, 2014, Pam Roach, State Senator in the 31st Legislative District and Representative Dahlquist's general election opponent, filed a complaint alleging that Ms. Dahlquist's campaign spent 2014 general election contributions prior to the 2014 primary election being held, and failed to accurately disclose joint campaign related activities that undertaken with another legislative candidate in the 31st Legislative District. **Exhibit #2.**

II.

Allegations in Complaint and Summary of Investigative Findings

- 2.1 The complaint alleged that the 2014 Cathy Dahlquist campaign (Campaign) for State Senate violated:
 - A. RCW 42.17A.405 and WAC 390-17-300(5) by spending contributions received and designated for the 2014 general election, for 2014 primary election-related activities, and by receiving in-kind contributions that exceeded the primary election contribution limits.
 - B. RCW 42.17A.235 and .240 by failing to fully disclose contributions and expenditures for transfers made with the Chris Hurst campaign for joint campaign-related advertisements and other coordinated activities.
- 2.2 For the 2014 election cycle, legislative candidates were subject to a \$950 contribution limit per election in which the candidates name appeared on the ballot. Staff queried the PDC contribution database for information filed by the Campaign, and found the Campaign disclosed receiving \$21,045 in monetary contributions designated and attributed to the 2014 general election, that were received prior to the August 5, 2014 primary election being held.
- 2.3 The \$21,045 in general election contributions included a \$1,545 transfer from the 2014 Cathy Dahlquist for State Representative campaign with the permission of the contributor. Staff subtracted that amount from the total general election contributions received prior to the August 5, 2014 Primary election for a total of \$19,500.
- 2.4 Ms. Dahlquist stated that for the 2014 election cycle she split campaign expenditures between the primary and general elections, and that she did not think of the Campaign expenditures in terms of a primary or general election expenditure. In addition, she did not think when making a Campaign expenditure that either 2014 primary or general election contributions were being spent, but rather as an expenditure for the entire 2014 election cycle.
- 2.5 PDC staff reviewed the spreadsheet that listed a total of \$27,578 in campaign expenditures of which one-half of the expenditures or \$13,788.87 were attributed by the campaign to the 2014 primary and general elections. The review found three double entries in the spreadsheet totaling \$1,632.47, and staff subtracted that amount from the expenditures totals, so that the portion of campaign expenditures made for the 2014 primary and general elections was \$12,156 for each.
- 2.6 Ms. Dahlquist stated that her Campaign made a number of expenditures for political advertisements that were either made for the 2014 general election, prior to the August 5, 2014 Primary election being held. She explained that some of the goods in question such as Campaign yard signs, flyers, paper, and toner cartridges were held in reserve and not used until the 2014 general election campaign. Those expenditures totaled \$8,308 and included the following:

- \$2,926 for one-half of campaign signs, and included \$647 for “Endorsed by” that were attached to campaign for only the general election;
- \$2,351 for one-half of Campaign flyers that were used to doorbell and leaflet for the general election;
- \$2,809 for one-third of the production costs for broadcast ads; and
- \$222 for one-half of the printed Campaign letterhead.

2.7 The Campaign made additional expenditures that were split between the primary and general elections. In those instances, the goods or services purchased by the Campaign had a continued use for the general election, but staff believes they were not of such a nature that they could be “reserved” until the primary election had passed. Staff believes those expenditures benefited Ms. Dahlquist’s primary election campaign, and were not eligible for general election funds to be spent.

2.8 Those expenditures totaled \$3,697.33 in general election expenditures that staff believes were not eligible to have been made by the Campaign until after the primary election had been held, and included the following:

- A broadcast political advertisement that was co-sponsored jointly with the Chris Hurst campaign, in which each campaign paid \$2,809 for approximately one-half of the production costs. Ms. Dahlquist stated that the joint advertisement ran prior to both the 2014 primary and general elections, and was split between the primary and general elections. Staff believes that \$1,404 of the broadcast advertisement that was attributed to the general election, the benefited the Campaign’s primary election efforts.
- The Campaign conducted two fundraisers or held two fundraising events, both prior to the August 5, 2014 primary election, and the Campaign attributed one-half of the expenditures for food, printing and mailing invitations, and insurance toward the general election totaling \$1,741.33.
- The Campaign made an expenditure to Moonshadow on May 13, 2014, which the Campaign split evenly split and attributed \$430 to the 2014 general election, for campaign software that contained demographic information about registered voters in the 31st Legislative District. The software allowed the Campaign to micro-target registered voters within each precinct of the legislative district for door-belling and get-out-the-vote (GOTV) activities.
- The Campaign made an expenditure to Visual Studio’s on April 30, 2014 for the campaign website, which the Campaign evenly split with \$75 each for the 2014 primary and general elections that included web-hosting fees for one-year and the opportunity to frequently update the campaign website throughout the 2014 election cycle.
- The Campaign made a \$93 expenditure to Sears on May 29, 2014, to purchase a drill that was used throughout the 2014 campaign to construct, assemble and repair campaign yard signs. The Campaign evenly split with \$46.50 each for the 2014 primary and general elections.

- 2.9 The Campaign received two \$1,900 in-kind contributions and attributed \$950 for the primary election and \$950 for the general election, which the complaint alleged exceeded contribution limits. Ms. Dahlquist stated both in-kind contributions were related to a June 25, 2014, fundraiser, and the campaign did not hold a general election fundraiser. She stated that she knew both in-kind contributors personally, and she did not receive an invoice or get provided a specific dollar amount to report for their services. Her Campaign reported the maximum in-kind contribution for each contributor, \$950 for the primary and \$950 for the general election.
- 2.10 Since no fundraiser was held for the 2014 general election, the campaign was allowed one \$950 in-kind contribution from each contributor. Ms. Dahlquist contacted both contributors to determine the “fair market value” of the services provided to the Campaign. She found that for one contributor, his role at the fundraiser “...will reflect the title of emcee (rather than auctioneer) and an amended \$250 in-kind contribution will be entered...” For the other contributor her Campaign received three in-kind contributions totaling \$1,250, and she will be refunding \$300 to that contributor.
- 2.11 Staff reviewed the transfers made between the Dahlquist Campaign and the Chris Hurst campaign for the 2014 election cycle for joint campaign-related advertisements and other coordinated activities. The review found that there were a number of transfers between the two campaigns for joint candidate activities, and those activities were timely reported by both candidates, although the transfers could have included a more detailed description. Finally, the Chris Hurt campaign exchanged communications with PDC staff throughout the 2014 election cycle concerning this matter.

III. **Detailed Findings**

- 3.1 For the 2014 election cycle, legislative candidates were subject to a \$950 contribution limit per election in which the candidates name appeared on the ballot, except for contributions received from political party organizations and caucus political committees.
- 3.2 Staff reviewed the campaign finance reports filed by the campaign, and information queried from the PDC Contribution database and found the campaign disclosed \$21,045 in monetary contributions that were attributed to the 2014 general election contribution, but had been received prior to the August 5, 2014 primary election.
- 3.3 On September 30, 2014, Ms. Dahlquist electronically submitted her response to the allegations made in the complaints filed against her by Senator Roach. **Exhibit #3.** On February 10, 2015, staff contacted Ms. Dahlquist and sent her an email concerning the expenditures she listed in the spreadsheet that she submitted as part of her September 30, 2014 response. Staff attached a portion of the spreadsheet previously provided by Ms. Dahlquist, but added a column with PDC staff questions and issues for each expenditure.
- 3.4 On August 3, 2015, PDC conducted a telephone interview under oath with Cathy Dahlquist concerning the allegations listed in the complaint and her September 30, 2014 response. (**Exhibit #4 – summary notes of telephone interview**) The responses below incorporate the responses from Ms. Dahlquist’s telephone interview, and her September 30, 2014 email and attached spreadsheet.

- 3.5 Ms. Dahlquist stated that for 2014 and in her prior House campaigns, she split campaign expenditures between the primary and general elections for that specific election year. When her campaign made expenditures for a specific election year, she did not think of it in terms of a primary or general election expenditure. Concerning the 2014 election, she stated that a lot of her campaigns political advertisements expenditures were made or secured for the 2014 general election, prior to the 2014 Primary election being held.
- 3.6 Ms. Dahlquist acknowledged that the vendor invoices requested by staff and provided by the campaign did not indicate or designate whether or not expenditures were split between the 2014 primary and general elections. She explained that was not an issue she would have discussed with her vendors at the time the order was either placed, or the goods and/or services were provided. She added that the Online Reporting Campaign Assistance (ORCA), did not notify or prompt her campaign to designate an expenditure for a specific primary or general election.
- 3.7 Ms. Dahlquist included a spreadsheet along with her September 30, 2014 response that provided a breakdown of 21 pre-August 5, 2014 campaign expenditures that were equally split and attributed between the August 5, 2014 Primary election, and the November 5, 2014 General election. The spreadsheet included columns for the date, vendor, and total amount of the expenditure, along with columns for expenditures the campaign attributed to the general election, and provided a brief description of the purpose of the expenditure, and additional details about the campaigns accounting of the expenditures.
- 3.8 PDC staff reviewed the spreadsheet that listed a total of \$27,578 in campaign expenditures of which one-half of the expenditures or \$13,788.87 were attributed by the campaign to the 2014 general election, and \$13,788.87 in campaign expenditures were attributed for the 2014 primary election. The review found three double entries in the spreadsheet totaling \$1,632.47, and staff subtracted that amount from the expenditures totals, so that the portion of campaign expenditures made for the 2014 primary and general elections was \$12,156 for each.
- 3.9 Ms. Dahlquist stated she believed the expenditures listed in the spreadsheet qualified as general election expenses, and that: *"It is important in a busy campaign season to secure the most sought after advertising in advance, while purchasing the printing and video production in a package, as it is the most cost effective use of campaign funds."*
- 3.10 Of the \$21,045 in monetary contributions that were attributed to the 2014 general election contribution and received prior to the August 5, 2014 primary election, the total included \$1,545 in contributions received from the 2014 Cathy Dahlquist for State Representative campaign for transfers of contributions with the permission of the contributor and attributed to the General election.

Campaign fundraisers and fundraising expenditures:

- 3.11 Ms. Dahlquist stated that she conducted two campaign fundraisers or fundraising events for her 2014 Senate campaign, both prior to the August 5, 2014 primary election that included:

1. A June 24, 2014, joint-campaign fundraiser with the 2014 Chris Hurst Campaign in which the contributions and expenditures were evenly split; and
 2. A June 25, 2014, campaign fundraiser that was held at Kelley Farms.
- 3.12 Ms. Dahlquist stated that she did not think of the fundraiser in terms of being a primary or general election fundraiser, since her campaign expected to receive both primary and general election contributions at the event. She stated the campaign made the following campaign expenditures for the June 25, 2014, campaign fundraiser at Kelley Farms:
- Mama Stortini's: The campaign made two expenditures to Mama Stortini's for food for the June 25, 2014 fundraising event totaling \$2,100 that included: (1) A \$500 campaign expenditure was made on June 12, 2014, which the Campaign split evenly with \$250 each for the primary and general election; and (2) A \$1,600.48 campaign expenditure was made on June 24, 2014, which the Campaign split evenly with \$800.24 each for the primary and general elections.
 - A \$395 campaign expenditure was made to Gale's Creek Insurance on June 23, 2014, for insurance for the campaign event at Kelley Farms, which the Campaign split evenly with \$197.50 each for the primary and general election.
 - Three campaign expenditures were made to Print NW totaling \$987.66 to print invitations for the Kelley Farm event, which the Campaign split evenly with \$493.83 each for the primary and general elections. The Campaign expenditures to Print NW were reported as being made as follows: (1) June 12, 2014 totaling \$207.76; (2) July 11, 2014 totaling \$462.64; and (3) July 11, 2014 totaling \$317.26.

Political Advertisements:

- 3.13 Ms. Dahlquist that during the 2014 election cycle, when her campaign made expenditures for political advertising she did not think of the expenditure in terms of being a primary or general election expenditure, but instead a 2014 expenditure for election to State Senator. She equated the contributions received in that manner due to contribution limits. She stated that for most types of political advertisements such as yard signs and campaign flyers, it is advantageous for the campaign to place as large an order at one time, and whenever possible for the entire campaign, because the campaign receives a "reduced bulk rate" for services.
- 3.14 Ms. Dahlquist stated the campaign had a process for separating, segregating, or storing 2014 primary and general election goods and services, including political advertisements, that were paid for with general election contributions prior to the primary election being held. She referred to the spreadsheet she provided as part of her response for the expenditures made by the Campaign and are detailed below.

Spectrum Signs:

- 3.15 The campaign made two expenditures to Spectrum Signs totaling \$4,557.39 to purchase yard signs that were used by the campaign for both the 2014 primary and general elections as follows:

1. A \$1,359.99 expenditure was made on April 30, 2014, which the Campaign split evenly with \$680 each for the 2014 primary and general election.
 2. A \$3,197.40 expenditure was made on June 6, 2014, which Campaign split evenly split with \$1,598.70 each for the 2014 primary and general elections.
- 3.16 The campaign made a third expenditure to Spectrum Signs on July 28, 2014 totaling \$647 for an "Endorsed by" sign that was attached to existing yard signs or newly placed yard after the August 5, 2014 primary election had been held. She stated that the campaign made that expenditure prior to the August 5, 2014 primary election, but indicated only general election funds were used.
- 3.17 Ms. Dahlquist stated that approximately one-half of the signs were stored in a portion of the room in her house that she used as her campaign office. She stated the campaign signs did not come assembled, so the campaign constructed the signs on an as needed basis throughout the 2014 election cycle. When asked she stated that she did not take any photographs in the area of the campaign office where the yard signs and other campaign materials were stored, since she did not think there was any reason to document that practice.
- 3.18 Ms. Dahlquist stated the general election campaign yard signs were either placed at new locations after the primary election had been, or replaced previously placed yard signs that had been damaged, stolen, or otherwise gone missing. She stated that she had discussions with her campaign staff and volunteers concerning yard signs, and the campaign's strategic decision to place one-half of the yard signs before the primary election and place the other half after the primary election had been held. She added that the campaign did order additional signs prior to the general election since so many of the campaign signs ended up missing that the signs stored for the general election had already been distributed.

Green Light Strategies: Campaign Flyer

- 3.19 On May 12, 2014, the Campaign made an expenditure to Green Light Strategies totaling \$4,702.38 to print flyers, which the Campaign split evenly split with \$2,351.19 each for the 2014 primary and general elections. Ms. Dahlquist stated the flyer was the Campaign's only "doorbelling" advertisement printed and that she distributed the flyer for the entire 2014 election. She stated that the Campaign's door-belling activities were "micro-targeted" using the Moonshadow software that she purchased in May of 2014 (see below).
- 3.20 Ms. Dahlquist stated that she visited one set of registered voters for the primary election, and a completely different set of registered voters for the general election, so she never door-belled the same household twice which allowed her to use the same flyer for the entire election. She stated the flyers were stored in the campaign office and used as needed, and she noted that they were divided pretty evenly between the 2014 primary and general elections. She added that she probably door-belled close to the same number of households for the 2014 primary and general elections.

Green Light Strategies: Broadcast Advertisements

- 3.21 Ms. Dahlquist stated the Campaign made three expenditures to Green Light Strategies on July 28, 2014, totaling \$8,426, which the Campaign split evenly split with \$4,123 each for the 2014 primary and general elections. She stated the expenditures were for a video shoot and production of three separate broadcast political advertisements.
- 3.22 Ms. Dahlquist stated that one broadcast political advertisement ran prior to the August 5, 2014 primary election being held, and that one advertisement ran after the primary election but before the 2014 general election. She stated that the third broadcast political advertisement was co-sponsored jointly with the Chris Hurst campaign, and each campaign paid for approximately one-half of the costs. She stated that Dahlquist-Hurst joint advertisement ran prior to both the 2014 primary and general elections, and was designated accordingly.

Capital City Printer: Campaign letterhead

- 3.23 On July 14, 2014, the Campaign made an expenditure to Capital City Printer totaling \$445.26 to campaign letterhead, which the Campaign split evenly split with \$222.63 each for the 2014 primary and general elections. Ms. Dahlquist stated the campaign used the letterhead for both 2014 primary and general election mailings and correspondence.

Other Campaign Expenditures:

Moonshadow:

- 3.24 On May 13, 2014, the Campaign made an \$860 expenditure to Moonshadow which the Campaign split evenly split with \$430 each for the 2014 primary and general elections. The expenditure was for campaign software that contained demographic information about registered voters in the 31st Legislative District. The software allowed the Campaign to strategically micro-target registered voters within each precinct of the legislative district for door-belling and get-out-the-vote (GOTV) activities.
- 3.25 Ms. Dahlquist stated that the campaign used the software extensively for both the 2014 primary and general elections to identify registered voters and enter information or make notes about a voter such as issues discussed, the voter's preferences, does the voter want a yard sign or to make a contribution or to be a volunteer, etc. Staff noted that the expenditure to Moonshadow was made one day after the \$4,702 expenditure to Green Light Strategies for the doorbelling piece that was used in conjunction with the software.

Visual Studio's

- 3.26 The Campaign made a \$150 expenditure to Visual Studio's on April 30, 2014 for the campaign website, which the Campaign evenly split with \$75 each for the 2014 primary and general elections. Ms. Dahlquist stated the expenditure included web-hosting fees for one-year and the opportunity to frequently update the campaign website, which occurred throughout the 2014 election cycle.

Arrow Lumber:

3.27 The campaign made two expenditures to Arrow Lumber totaling \$243.42 on June 6, 2014, to purchase stakes, lathes and screws which was used to construct the campaign yard signs. Ms. Dahlquist stated the yard signs materials were used by the campaign for both the 2014 primary and general elections, which the Campaign split evenly with \$121.71 each for the 2014 primary and general election.

Office Depot:

3.28 The campaign made an expenditure to Office Depot totaling \$217.59 on May 29, 2014, to purchase campaign office supplies including bulk paper and printer cartridges, which the Campaign split evenly with \$108.80 each for the 2014 primary and general election. Ms. Dahlquist stated the paper and printer cartridges were stored in the campaign office used by the campaign for both the 2014 primary and general elections.

Sears:

3.29 The Campaign made a \$93 expenditure to Sears on May 29, 2014, to purchase a drill that was used throughout the 2014 campaign to construct, assemble and repair campaign yard signs, which the Campaign evenly split with \$46.50 each for the 2014 primary and general elections. Ms. Dahlquist stated that the drill was a necessary purchase since the campaign signs are not constructed, so the Campaign has to purchase the signs, stakes, lathes, and screws separately and then construct each sign individually. She noted that the drill purchased at Sears was used by the campaign to attach the "Endorsed by" signs for the general election.

General Election In-kind Contributions received prior to 8/5/2014 Primary election

3.30 Staff reviewed the in-kind contributions received by the Campaign and found the campaign disclosed receiving two in-kind contributions totaling \$1,900 each that were prior to the August 5, 2014 primary election being held, and attributed one-half of the in-kind contribution amount to the general election. Both in-kind contributions were received for a June 25, 2014 event and included the following descriptions:

- John Curley Auctioneer: In-kind contributions for donated services as an Auctioneer for a Campaign fundraiser held on June 27, 2014, with \$950 attributed to the primary election, and \$950 attributed to the general election.
- Kelley Farm: In-kind contribution for donated services of the facility including the use of the farm and barn for a campaign fundraiser held on June 27, 2014, with \$950 attributed to the primary election.

3.31 Ms. Dahlquist stated that the two \$1,900 in-kind contributors received by the Campaign from John Curley Auctioneers and Kelley Farms were both related to a June 25, 2014, fundraiser. She stated that the in-kind contributions were for only one fundraising event, and no fundraiser was held for the 2014 general election.

- 3.32 Ms. Dahlquist stated she knew both Mr. Curley and Sandy Corliss, the owner of Kelly Farms personally, and that she did not receive an invoice for their services and they did not provide her with a specific dollar amount to report. Since she did not have a discussion with either Mr. Curley or Ms. Corliss about the amount to report as an in-kind contribution for the services provided, her Campaign reported the maximum in-kind contribution for each contributor, \$950 for the primary and \$950 for the general election.
- 3.33 Staff discussed with Ms. Dahlquist the need for her to communicate with the two individuals to establish a “fair market value” for their services. Ms. Dahlquist stated that after she received staff’s July 2015 email concerning the in-kind contributions, she reviewed the 2014 Statewide Executive and Legislative candidate reporting manual, and found information on page 44 of the manual that stated a candidate can’t accept general election goods or services, until after the primary election has been held. She understood at that time that it appeared likely that she had “over-reported” the amount for the services provided, which meant her campaign exceeded the 2014 primary contribution limits for both of those contributors.
- 3.34 Staff exchanged several emails with Ms. Dahlquist in September of 2015, concerning the in-kind contributions reported as being received from Mr. Curley and Ms. Corliss, and assisting her in establishing a “fair market value” for those services provided to her Campaign.
- 3.35 Ms. Dahlquist contacted John Curley and determined from their discussions that his role at the fundraiser “...will reflect the title of emcee (rather than auctioneer) and an amended \$250 in-kind contribution will be entered....” by the Campaign on an amended C-4 report. Ms. Dahlquist stated that after contacting Ms. Corliss and discussing the matter she determined that her Campaign received three in-kind contributions from Kelley Farms totaling \$1,250 for three separate in-kind contributions of \$416.66 each (as opposed to the \$1,900 previously reported).
- 3.36 Ms. Dahlquist’s treasurer has been working to amend her C-4 reports to accurately reflect the in-kind contributions that were received, and refund any over-limit in-kind contributions received from Kelley Farms. The Campaign has experienced difficulties re-installing the ORCA software and in transmitting the amended C-4 report.

Campaign transfers with the 2014 Chris Hurst campaign:

- 3.37 Ms. Dahlquist stated that during the 2014 election, there was no liabilities to disclose between her Campaign and the 2014 Chris Hurst for State Representative Campaign, since there were no liabilities incurred. She stated concerning the complaint that the shared advertisements and the Campaign’s decision to purchase one-half of a newspaper ad with the Chris Hurst campaign were: “...made on a weekly basis based on if our campaign had the available funds.”
- 3.38 Ms. Dahlquist stated that everyone in the district was aware that her Campaign and the 2014 Chris Hurst for State Representative Campaign were campaigning together. She stated the campaigns conducted activities jointly and proportionally shared campaign resources that included broadcast and newspaper advertisements, flyers, canvassing and get-out-the-vote efforts.

- 3.39 Ms. Dahlquist reiterated that there were no liabilities incurred for the shared activities with the Chris Hurst campaign, since those decisions were made as campaign funds were available. She stated the shared campaign expenditures with the Citizens for Chris Hurst campaign were also detailed on either the C-3 or C-4 reports for each campaign, depending on which campaign was being reimbursed. The reimbursements or shared expenditures were for political advertising in the form of newspaper ads and flyers, canvassing and other get-out-the-vote efforts.
- 3.40 During the 2014 campaign, Representative Hurst communicated with PDC staff on a number of occasions concerning the joint campaign activities and the reporting requirements for those activities between the two campaigns.

IV. **Scope**

4.1 PDC staff reviewed the following documents:

- The complaint filed by Pam Roach against Cathy Dahlquist on August 8, 2014.
- C-3 reports and C-4 reports filed by the Cathy Dahlquist campaign.
- Queried the PDC contribution and expenditure databases concerning Cathy Dahlquist.
- September 30, 2014, response submitted by email from Cathy Dahlquist that included a spreadsheet and additional documentation.
- March 12, 2015, email exchange with Cathy Dahlquist in which she attached a number of campaign invoices.
- May 28 and 29, 2015, email exchange with Cathy Dahlquist in which she attached campaign invoices.
- August 3, 2015, in-person interview under oath with Ms. Dahlquist.
- September 2015, email exchange with Cathy Dahlquist concerning over-limit in-kind contributions received by the Campaign.

V. **Laws**

5.1 **RCW 42.17A.405(2)** states in part:

“No person, other than a bona fide political party or a caucus political committee, may make contributions to a candidate for a legislative office, county office, city council office, mayoral office, school board office, or public hospital district board of commissioners that in the aggregate exceed eight hundred dollars or to a candidate for a public office in a special purpose district or a state office other than a legislative office that in the aggregate exceed one thousand six hundred dollars for each election in which the candidate is on the ballot or appears as a write-in candidate. Contributions to candidates subject to the limits in this section made with respect to a primary may not be made after the date of the primary.”

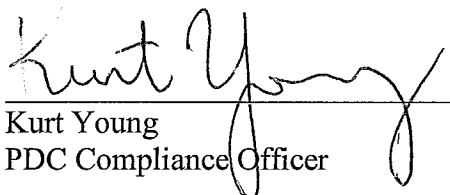
5.2 **WAC 390-17-300** states in part:

“Any portion of an undesignated contribution made prior to the date of the primary which exceeds the contributor's primary election contribution limit shall be attributed to the contributor's limit for the general election.

(4) Contributions for the primary election shall be accounted for separately from those for the general election...”

“(5) General election contributions shall not be spent for the primary election if to do so would cause the contributor of the general election contribution to exceed that contributor's contribution limit for the primary election.

Respectfully submitted this 12th day of October, 2015.


Kurt Young
PDC Compliance Officer

List of Exhibits

- Exhibit #1** Candidate Registration (C-1 report) filed by Cathy Dahlquist declaring her candidacy for State Senator in the 31st Legislative District in 2014
- Exhibit #2** Complaint filed against Cathy Dahlquist by Pam Roach.
- Exhibit #3** September 30, 2014, response letter and attached spreadsheet electronically submitted by Cathy Dahlquist to the allegations made in the complaint.
- Exhibit #4** Summary notes of an August 3, 2015, telephone interview conducted under oath with Cathy Dahlquist concerning the allegations listed in the complaint.



Candidate Registration

C1

(1/12)

DATE FILED PDC
APR - 4 2014

Candidate's Name (Give candidate's full name.)
Catherine C Dahlquist

Telephone Number
(253) 653-3163

Candidate's Committee Name (Do not abbreviate.)
Committee to Elect Cathy Dahlquist

Fax Number
()

Mailing Address
1348 Florence St

Candidate's E-Mail Address
cathydahlquist@comcast.net

City
Enumclaw

County
King

Zip + 4
98022-2223

Campaign E-Mail Address
cathydahlquist@comcast.net

1. What office are you running for?
State Senate

Legislative District, County or City
31st

Position No.

Do you now hold this office?
Yes No

2. Political party (if partisan office)
Republican

3. Date of general or special election
11/4/2014

4. How much do you plan to spend during your entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. If no box is checked you are obligated to use Option II, Full Reporting. See instruction manuals for information about reports required and changing reporting options.
 Option I MINI REPORTING: In addition to my filing fee of \$_____, I will raise and spend no more than \$5,000, including any charges for inclusion in state and local voters pamphlets. I will not accept more than \$500 in the aggregate from any contributor except myself.
 Option II FULL REPORTING: I will use the Full Reporting system. I will file the frequent, detailed campaign reports required by law.

5. Treasurer's Name and Address. Does treasurer perform only ministerial functions? Yes ___ No ___ See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet.
Willis Bathum
PO Box 335
Enumclaw, WA 98022

Daytime Telephone Number
(253) 7409432

6. Persons who perform only ministerial functions on your behalf and on behalf of other candidates or political committees. List name, title and address of these persons. See WAC 390-05-243 and next page for details.
 Continued on attached sheet.

7. Committee Officers and other persons who authorize expenditures or make decisions on your behalf. List name, title and address. See next page for definition of "officer."
 Continued on attached sheet.

8. Campaign Bank or Depository
Columbia Bank

Branch
Enumclaw

City
Enumclaw

9. Related or Affiliated Political Committees. List name, address and relationship.
 Continued on attached sheet.

10. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address.
Street Address, Room Number, City where campaign books will be available for inspection
1700 1st St. Enumclaw, WA 98022
In order to make an appointment, contact the campaign at (telephone, fax, e-mail): ()

11. CERTIFICATION:
I certify that this report is true, complete and correct to the best of my knowledge.
Candidate's Signature *Catherine C Dahlquist* Date **4/2/2014**

Office Use Only: No. _____

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Public Disclosure Commission

WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION

COMPLAINT FORM

(See instructions on the last page.)

Description of Complaint

1. RESPONDENT:

Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.

Example #1: Joe Public, Mayor of My Town,

123 Main Street, Your Town, State, Phone: 555-123-4567, Email: unknown

Example #2: The Political Action Group (instead of P.A.G.), 123 Main Street, Your Town, State,

Phone: 555-123-4567, Email: pag@pag.org

Cathy Dahlquist
Committee to Elect Cathy Dahlquist
1348 Florence Street, Enumclaw, WA
(253) 653-3163 phone

Cathydahlquist@comcast.net

2. ALLEGED VIOLATIONS:

Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17/RCW 42.17A or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed. (Note that the RCW 42.17 citation applies to conduct before 2012 and the RCW 42.17A citation applies to conduct on or after January 1, 2012.)

Cathy Dahlquist violated WAC 390-17-300 (5) when she illegally spent campaign money reserved for the general election in the primary election.

WAC 390-17-300 (5) states that: "General election contributions shall not be spent for the primary election if to do so would cause the contributor of the general election contribution to exceed that contributor's contribution limit for the primary election."

Unfortunately this appears to be exactly what is happening.

As of July 31st, Dahlquist's campaign has raised only \$55,399.28 for the primary election (and \$20,095.28 for the general), however it has spent a total of \$83,710.39 for the primary, far in excess of

legal limits.

Dahlquist's illegal spending of general election campaign money for the primary election is understandable given her poor poll numbers, but it is nevertheless in violation of the election finance rules.

fine, and require Dahlquist to refund the

I urge the PDC to investigate this matter and reprimand the Dahlquist campaign for this violation.

illegally spent money. She should send the amount illegally used, back to the donors who had the right to expect she would not cheat with their money. She should not be able to raise additional

3. EVIDENCE:

List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.

Example: Emails between Joe public and Candidate X, attached OR

Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.

Attached, campaign finance reports showing primary and general election contributions as well as pre-general election expenditures.

4. WITNESSES:

List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. Attach additional pages if needed.

Example: Jane Public was present when Candidate X spoke to me about the illegal contribution. Jane Public's address is 123 Main Street, Your Town, USA 12345, and her phone number is 555-123-4567.

Tres. John Bathum
Consultant Chad Minnick

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This is an egregious campaign law violation that can not be undone.

Certification

In signing this complaint:

- I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

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Your name (print or type): Pam Roach, State Senator

AUG - 1 2014

Street address: 22102 SE Green Valley Rd , Auburn, WA 98092 Public Disclosure Commission

City, state and zip code: Auburn, WA

Telephone number (including area code) (253) 735-4210

E-mail address (optional) pamroach@aol.com

Oath

Required for complaints against elected officials or candidates for elective office:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.*

Your signature Pam Roach

Date signed 7-30-14

Place signed (city and county)

Sumner, Pierce
City County

Attachments

Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint.

**RCW 9A.72.040 says 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."*

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Washington State Public Disclosure Commission

Instructions for Filing a Formal Complaint

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- **When to use the formal complaint form:**

Public Disclosure Commission

While this form is not required, its use is recommended when you want to file formal allegations of a violation of the Public Disclosure Commission (PDC) statutes or rules. You can find the PDC statutes and rules on the PDC website at www.pdc.wa.gov.

If you have information or concerns about a possible violation but do not wish to file a complaint, please contact the PDC office directly.

- **How to submit your complaint form to the PDC:**

- Complete all sections. If you do not have some information, please write "unknown" instead of leaving a blank space.
- Attach copies of any evidence you have - we'll contact you if we need originals.
- Sign the oath if your complaint is against an elected official or a candidate for elective office.
- Mail, fax, or email your complaint and all attachments to the PDC.

- **If you have more questions:**

If you have more questions about filing a complaint, see the "Frequently Asked Questions about Filing a Complaint" guide available on the PDC's website at www.pdc.wa.gov under "Enforcement and Compliance." You may also contact the PDC directly.

PDC Contact Information

MAILING ADDRESS: Washington State Public Disclosure Commission

711 Capitol Way, Room 206

PO Box 40908

Olympia, WA 98504-0908

EMAIL ADDRESS: pdc@pdc.wa.gov

PHONE: 1-877-601-2828 (toll free)

FAX: (360) 753-1112

HOURS: Monday-Friday, 8:00 a.m. – 5:00 p.m., closed on state holidays.

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Spent	IEFor	IEAgainst							
Contributor	Date	Amount	P/G	City	State	Zip	Employer	Occupation	
COMMITTEE TO ELECT CATHY DAHLQUIST	2014-07-01	1545.28	P	ENUMCLAW	WA	98022			
APRILS PET SALON	2014-06-27	950.00	P	ENUMCLAW	WA	98022			
BONEY BETTY	2014-06-03	950.00	P	CRYSTAL BAY	WA	98391	RETIRED	RETIRED	
BONEY STANLEY	2014-06-03	950.00	P	CRYSTAL BAY	NV	98391	SPROUTS FARMERS MARKET	CEO	
CYBERDYNE NETWORKS INC	2014-06-27	950.00	P	ENUMCLAW	WA	98022			
FARMERS EMPLOYEES AND AGENTS	2014-04-04	950.00	P	OLYMPIA	WA	98501			
HURST APRIL	2014-06-27	950.00	P	ENUMCLAW	WA	98022	SELF	SELF EMPLOYED	
HURST CHRISTOPHER	2014-04-05	950.00	P	ENUMCLAW	WA	98022	STATE OF WASHINGTON	STATE REPRESENTATIVE	
HURST CYNTHIA	2014-06-27	950.00	P	PALM DESERT	WA	92211	EISENHOWER MEDICAL CENTER	PHARMACIST	
HURST MIKE	2014-06-27	950.00	P	PALM DESERT	CA	92211	FIRESIDE PHARMACY	PHARMACIST	
NALL SCOTT	2014-07-14	950.00	P	SUMNER	WA	98390	SEFNCO	PRESIDENT	
SEFNCO	2014-07-14	950.00	P	SUMNER	WA	98390			
THOMPSON DIANE C	2014-06-27	950.00	P	ENUMCLAW	WA	98022		RETIRED	
THOMPSON ROBERT S	2014-06-27	950.00	P	ENUMCLAW	WA	98022		RETIRED	
WA HOSPITAL POLITICAL ACTION COMMITTEE	2014-07-19	950.00	P	SEATTLE	WA	98119			
ALTRIA CLIENT SERVICES INC	2014-04-30	900.00	P	RICHMOND	VA	23230			
AT&T	2014-04-30	900.00	P	REDMOND	WA	98052			
BRIAN CAVE	2014-04-30	900.00	P	REDMOND	WA	98052			
BROOKSIDE DENTAL	2014-04-30	900.00	P	BELLEVUE	WA	98005			
CAREMARK RX INC	2014-04-30	900.00	P	LINCOLN	RI	028950287			
CREDIT UNION LEGISLATIVE ACTION FUND	2014-06-03	900.00	P	FEDERAL WAY	WA	98003			
EAST PIERCE FIREFIGHTERS	2014-07-12	900.00	P	BONNEY LAKE	WA	98391			
FEDERAL EXPRESS	2014-04-30	900.00	P	MEMPHIS	TN	38120			
GOLDEN AGE DENTISTRY	2014-04-30	900.00	P	KENMORE	WA	98028			
MUTUAL OF ENUMCLAW	2014-04-30	900.00	P	ENUMCLAW	WA	98022			
PAULEY CINDY	2014-04-30	900.00	P	REDMOND	WA	98052	BROOKSIDE DENTAL	DENTIST	
PAULEY GILBERT	2014-04-30	900.00	P	REDMOND	WA	98052	BROOKSIDE DENTAL	DENTIST	
PAULEY PATRICIA	2014-04-30	900.00	P	REDMOND	WA	98052	BROOKSIDE DENTAL	DENTIST	
PMSA WASHINGTON STATE PAC	2014-04-30	900.00	P	SAN FRANCISCO	CA	94104			
RAI SERVICES COMPANY	2014-04-30	900.00	P	SEWELL	NJ	08080			
WA BEER & WINE DISTRIBUTORS ASSN	2014-06-29	900.00	P	OLYMPIA	WA	98507			
WA BEER & WINE WHOLESALEERS PAC	2014-06-03	900.00	P	TACOMA	WA	98401			
WA CHIROPRACTIC TRUST	2014-04-30	900.00	P	SEATTLE	WA	98111			
WA ST AUTO DEALERS PAC	2014-06-03	900.00	P	TUKWILA	WA	98188			
WASHINGTON DENTAL SERVICES	2014-06-03	900.00	P	SEATTLE	WA	98115			
WASHINGTON RESTAURANT ASSN PAC	2014-04-30	900.00	P	OLYMPIA	WA	98501			
WSDA	2014-07-07	900.00	P	SEATTLE	WA	98107			
LOPEZ CAITLIN	2014-06-27	800.00	P	RENTON	WA	98058	CHRISTOPHER HURST	CAMPAIGN MANAGER	
HINDERY LEO	2014-07-14	750.00	P	NEW YORK	NY	10075	INTERMEDIA PARTNERS	CEO	
KIMS SWEET DREAM CAKES	2014-06-27	700.00	P	ENUMCLAW	WA	98022			
WORK SPORTS & OUTDOORS	2014-06-27	700.00	P	ENUMCLAW	WA	98022			
GWEDERS SWISS ACRES	2014-06-27	650.00	P	ENUMCLAW	WA	98022			
CAMBIA HEALTH SOLUTIONS	2014-06-03	550.00	P	PORTLAND	OR	97207			
AIRPORT MECHANICAL SERVICES INC	2014-04-30	500.00	P	ENUMCLAW	WA	98022			
BATHUM JON	2014-06-03	500.00	P	ENUMCLAW	WA	98022	UNIVERSITY OF MONTANA LAW SCHOOL	STUDENT	
BATHUM WILLIS F	2014-06-03	500.00	P	ENUMCLAW	WA	98022	ENUMCLAW SCHOOL DISTRICT	FOOTBALL COACH	
CHARTER	2014-07-07	500.00	P	STAMFORD	CT	06901			
CHILDRENS CAMPAIGN FUND	2014-06-27	500.00	P	SEATTLE	WA	98109			
EAR NOSE THROAT FACIAL PASTIC SURGERY & ALLERGY OF WESTERN WASHINGTON INC P	2014-06-03	500.00	P	ENUMCLAW	WA	98022			
ENTERTAINMENT SOFTWARE	2014-04-30	500.00	P	WASHINGTON	DC	20004			
JOHNSON & JOHNSON	2014-07-12	500.00	P	NEW BRUNSWICK	NY	08906			
LLC JBERS	2014-04-30	500.00	P	ISSAQUAH	WA	98507	JBERS	DENTIST	
MILES SAND AND GRAVEL	2014-06-29	500.00	P	PUYALLUP	WA	98372			
PREMERA	2014-06-03	500.00	P	MOUNT LAKE TERRACE	WA	98043			
TAKEDA PHARMACEUTICALS	2014-04-30	500.00	P	DEERFIELD	IL	60015			
WALPAC	2014-04-30	500.00	P	BENTONVILLE	AR	727160150			
WRIGHT GREGORY A	2014-06-03	500.00	P	LAKE TAPPS	WA	98391	ABRA	OWNER	
CAMBIA HEALTH SOLUTIONS	2014-04-30	400.00	P	PORTLAND	OR	97207			
SPRINT NEXTEL	2014-04-30	400.00	P	PHOENIX	AZ	850823670			
CARDINAL HEALTH	2014-07-07	300.00	P	DUBLIN	OH	43017			

VULCAN INC	2014-06-03	300.00	P	SEATTLE	WA	98104		
WA AGGREGATE & CONCRETE	2014-04-30	300.00	P	DES MOINES	WA	98198		
ALIBHAI KARIM	2014-06-27	250.00	P	BELLEVUE	WA	98007	ADVANCED ENDOODNTICS	DENTIST
COOK FAMILY DENTISTRY	2014-06-27	250.00	P	AUBURN	WA	98002		
KROGER	2014-07-07	250.00	P	CINCINNATI	OH	45202		
MERRILL NANCY	2014-06-27	250.00	P	ENUMCLAW	WA	98022	ENUMCLAW SCHOOL BOARD	COMMUNITY REP
PARKER LISA	2014-06-27	250.00	P	ENUMCLAW	WA	98022	FEDERAL WAY PUBLIC SCHOOLS	TEACHER
PEHCO	2014-06-03	250.00	P	SEATTLE	WA	98109		
WASTE CONNECTIONS INC	2014-06-29	250.00	P	FIFE	WA	98424		
WILBUR KIRBY	2014-06-27	250.00	P	HERNDON	VA	20171	YOUNG AMERICA FOUNDATION	EXECUTIVE DIRECTOR
ZARELLI LEN	2014-07-12	250.00	P	LAKE TAPPS	WA	98391	MERIT COMPANY	PRESIDENT
BECKER NANCY	2014-06-27	225.00	P	ENUMCLAW	WA	98022	SELF	DOCTOR
BEVEGNI FRED	2014-06-03	225.00	P	PUYALLUP	WA	98373		RETIRED
BEVEGNI PAULA	2014-06-03	225.00	P	PUYALLUP	WA	98373		RETIRED
GOODFELLOW & ASSOCIATES	2014-06-27	200.00	P	ENUMCLAW	WA	98022		
HOFFMAN ROBERT E	2014-06-27	200.00	P	ENUMCLAW	WA	98022		RETIRED
HURST LON	2014-06-27	200.00	P	BONNEY LAKE	WA	98391		RETIRED
TKACH MARY LOU	2014-07-16	200.00	P	SUMNER	WA	98390	RETIRED	RETIRED
WA FOOD INDUSTRY ASSN	2014-04-30	200.00	P	OLYMPIA	WA	98507		
WFPA	2014-06-03	200.00	P	OLYMPIA	WA	98501		
PARTIN DWIGHT W	2014-06-03	150.00	P	SOUTH PRAIRIE	WA	98385	SOUTH PRAIRIE CREEK RV PARK	OWNER
BORT CONSTRUCTION	2014-06-27	100.00	P	ENUMCLAW	WA	98022		
BUNK RAYMOND	2014-07-19	100.00	P	BONNEY LAKE	WA	98391	FEDERAL WAY PD	POLICE OFFICER
CARPENTER NANCY	2014-07-07	100.00	P	BONNEY LAKE	WA	98391		
CHAMP ED CONSULTANTS	2014-07-07	100.00	P	SUMNER	WA	98390		
HANCOCK TAMARAH	2014-06-27	100.00	P	ENUMCLAW	WA	98022		
JENSEN A TOM	2014-07-12	100.00	P	AUBURN	WA	98092		
KOENIG MELISSA	2014-04-30	100.00	P	AUBURN	WA	98092		
MAKS JOHN	2014-06-27	100.00	P	ENUMCLAW	WA	98022		
MYERS JAMES	2014-06-27	100.00	P	SAMMAMISH	WA	98075	WASHINGTON POLICY CENTER	POLICY ANALYST
MYERS JAMES	2014-04-04	100.00	P	SAMMAMISH	WA	98075		
OBRIEN AL	2014-06-27	100.00	P	SEATTLE	WA	98122		
PRICE TERRY	2014-06-27	100.00	P	SEATTLE	WA	98115		
QUALLS MIKE	2014-07-07	100.00	P	ENUMCLAW	WA	98022		
REINVALD ILMAR	2014-06-27	100.00	P	ENUMCLAW	WA	98022		
SANDO MICHAEL	2014-04-30	100.00	P	ENUMCLAW	WA	98022		
SAUNDERS KATHLEEN	2014-06-27	100.00	P	SEATTLE	WA	98199		
SCHOLL WENDY	2014-06-27	100.00	P	SEATTLE	WA	98115		
SHERMAN TERRI	2014-06-27	100.00	P	ENUMCLAW	WA	98022		
SOLBERG PATRICIA	2014-06-27	100.00	P	SEATTLE	WA	98109		
STONINGTON DAVID	2014-06-27	100.00	P	SEATTLE	WA	98112		
TAYLOR STEVE	2014-06-27	100.00	P	ENUMCLAW	WA	98022	ENUMCLAW SCHOOL DISTRICT	TEACHER
WESTERN WELL SCREEN	2014-07-22	100.00	P	BUCKLEY	WA	98321		
WITA	2014-04-30	100.00	P	WASHINGTON	DC	20004		
NELSON BRITT	2014-06-27	99.00	P	ENUMCLAW	WA	98022		
ABRAMSON DIANE	2014-06-27	75.00	P	ENUMCLAW	WA	98022		
BUNK RAYMOND	2014-06-27	75.00	P	BONNEY LAKE	WA	98391	FEDERAL WAY PD	POLICE OFFICER
BUNK RAYMOND	2014-06-27	75.00	P	BONNEY LAKE	WA	98391	FEDERAL WAY PD	POLICE OFFICER
BOTTEN TERESA	2014-06-27	50.00	P	CHEHALIS	WA	98532		
BRIAN CAVE	2014-06-03	50.00	P	REDMOND	WA	98052		
BROOKSIDE DENTAL	2014-06-03	50.00	P	BELLEVUE	WA	98005		
EHL LARRY	2014-06-27	50.00	P	EDMONDS	WA	98026		
ELFERS RICHARD	2014-06-27	50.00	P	ENUMCLAW	WA	98022		
JONES STEPHEN	2014-06-27	50.00	P	SEATTLE	WA	98115		
KRAUSS RUTH	2014-06-27	50.00	P	SEATTLE	WA	98122		
LELAND HAL	2014-06-27	50.00	P	EDMONDS	WA	98026		
MCDONALD SYDNEY	2014-06-27	50.00	P	ENUMCLAW	WA	98022		
MESHKE BETH	2014-06-03	50.00	P	SUMNER	WA	98390		
MUTUAL OF ENUMCLAW	2014-06-27	50.00	P	ENUMCLAW	WA	98022		
NEMETH FRANK	2014-06-27	50.00	P	ENUMCLAW	WA	98022		
PAULEY CINDY	2014-06-03	50.00	P	REDMOND	WA	98052	BROOKSIDE DENTAL	DENTIST
SHERMAN RICK	2014-06-27	50.00	P	ENUMCLAW	WA	98022		
STEEL WILLIAM	2014-06-27	50.00	P	ENUMCLAW	WA	98022		
STUDEBAKER RAY	2014-06-27	50.00	P	SEATTLE	WA	98102		
TABASINSKE ARIN	2014-06-27	50.00	P	SEATTLE	WA	98102		
WEIR KRISTINA H	2014-06-27	50.00	P	BELLEVUE	WA	98006		

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FERRIER MARK S	2014-06-03	30.00	P	EDGEWOOD	WA	98372		
VANDERBULEN JANSEN M	2014-07-16	30.00	P	SEDRO WOOLLEY	WA	98284		
WRIGHT GREGORY A	2014-06-27	25.00	P	LAKE TAPPS	WA	98391	ABRA	OWNER
TAYLOR STEVE	2014-06-27	20.00	P	ENUMCLAW	WA	98022	ENUMCLAW SCHOOL DISTRICT	TEACHER
PROCEEDS FROM LOW COST FUNDRAISER	2014-06-27	188.00	N					
COMMITTEE TO ELECT CATHY DAHLQUIST	2014-07-01	1545.28	G	ENUMCLAW	WA	98022		
APRILS PET SALON	2014-06-27	950.00	G	ENUMCLAW	WA	98022		
BONEY BETTY	2014-06-03	950.00	G	CRYSTAL BAY	WA	98391	RETIRED	RETIRED
BONEY STANLEY	2014-06-03	950.00	G	CRYSTAL BAY	NV	98391	SPROUTS FARMERS MARKET	CEO
CYBERDYNE NETWORKS INC	2014-06-27	950.00	G	ENUMCLAW	WA	98022		
HURST APRIL	2014-06-27	950.00	G	ENUMCLAW	WA	98022	SELF	SELF EMPLOYED
HURST CHRISTOPHER	2014-04-05	950.00	G	ENUMCLAW	WA	98022	STATE OF WASHINGTON	STATE REPRESENTATIVE
HURST CYNTHIA	2014-06-27	950.00	G	PALM DESERT	WA	92211	EISENHOWER MEDICAL CENTER	PHARMACIST
HURST MIKE	2014-06-27	950.00	G	PALM DESERT	CA	92211	FIRESIDE PHARMACY	PHARMACIST
NALL SCOTT	2014-07-14	950.00	G	SUMNER	WA	98390	SEFNCO	PRESIDENT
SEFNCO	2014-07-14	950.00	G	SUMNER	WA	98390		
THOMPSON DIANE C	2014-06-27	950.00	G	ENUMCLAW	WA	98022		RETIRED
THOMPSON ROBERT S	2014-06-27	950.00	G	ENUMCLAW	WA	98022		RETIRED
WA HOSPITAL POLITICAL ACTION COMMITTEE	2014-07-19	950.00	G	SEATTLE	WA	98119		
PMSA WASHINGTON STATE PAC	2014-04-30	900.00	G	SAN FRANCISCO	CA	94104		
FARMERS EMPLOYEES AND AGENTS	2014-04-04	850.00	G	OLYMPIA	WA	98501		
MUTUAL OF ENUMCLAW	2014-06-27	850.00	G	ENUMCLAW	WA	98022		
HINDERY LEO	2014-07-14	750.00	G	NEW YORK	NY	10075	INTERMEDIA PARTNERS	CEO
GWERDERS SWISS ACRES	2014-06-27	650.00	G	ENUMCLAW	WA	98022		
BATHUM JON	2014-06-03	500.00	G	ENUMCLAW	WA	98022	UNIVERSITY OF MONTANA LAW SCHOOL	STUDENT
BATHUM WILLIS F	2014-06-03	500.00	G	ENUMCLAW	WA	98022	ENUMCLAW SCHOOL DISTRICT	FOOTBAL COACH
PAULEY CINDY	2014-06-03	200.00	G	REDMOND	WA	98052	BROOKSIDE DENTAL	DENTIST
BRIAN CAVE	2014-06-03	150.00	G	REDMOND	WA	98052		
BROOKSIDE DENTAL	2014-06-03	150.00	G	BELLEVUE	WA	98005		
PAULEY CINDY	2014-06-03	150.00	G	REDMOND	WA	98052	BROOKSIDE DENTAL	DENTIST
BRIAN CAVE	2014-06-03	100.00	G	REDMOND	WA	98052		
BROOKSIDE DENTAL	2014-06-03	100.00	G	BELLEVUE	WA	98005		
MUTUAL OF ENUMCLAW	2014-04-30	100.00	G	ENUMCLAW	WA	98022		
BRIAN CAVE	2014-06-27	50.00	G	REDMOND	WA	98052		
MESHKE BETH	2014-06-03	50.00	G	SUMNER	WA	98390		
BROOKSIDE DENTAL	2014-06-27	37.50	G	BELLEVUE	WA	98005		
BROOKSIDE DENTAL	2014-06-27	37.50	G	BELLEVUE	WA	98005		
BROOKSIDE DENTAL	2014-06-27	37.50	G	BELLEVUE	WA	98005		
BROOKSIDE DENTAL	2014-06-27	37.50	G	BELLEVUE	WA	98005		

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Public Disclosure Commission

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Pam Roach
P.O. Box 682
Auburn, WA 98092

2014 AUG -8 PM 12:09
PUBLIC BE CLOSED COMMISSION

To Whom It May Concern:

Please consider this a formal complaint of campaign finance violations. Please consider each point as an individual complaint if that will speed up any of your process.

Sincerely,
Pam Roach

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2014 AUG -9 PM 2:09

**WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION
COMPLAINT FORM**

(See instructions on the last page.)

Description of Complaint

1. RESPONDENT:

Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.

Example #1: Joe Public, Mayor of My Town,

123 Main Street, Your Town, State, Phone: 555-123-4567, Email: unknown

Example #2: The Political Action Group (instead of P.A.G.), 123 Main Street, Your Town, State,

Phone: 555-123-4567, Email: pag@pag.org, Website: www.PAGwashington.org

Rep. Cathy Dahlquist

2. ALLEGED VIOLATIONS:

Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17/RCW 42.17A or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed. *(Note that the RCW 42.17 citation applies to conduct before 2012 and the RCW 42.17A citation applies to conduct on or after January 1, 2012.)*

*see attached -
multiple references*

Evidence and Witnesses

3. EVIDENCE:

List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. **Attach additional pages if needed.**

Example: Emails between Joe public and Candidate X, attached OR

Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.

attached

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4. WITNESSES:

List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. **Attach additional pages if needed.**

Example: Jane Public was present when Candidate X spoke to me about the illegal contribution. Jane Public's address is 123 Main Street, Your Town, USA 12345, and her phone number is 555-123-4567.

Certification

In signing this complaint:

- I have provided all information, documents and other evidence of which I am aware;

- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.
- Unless otherwise noted, I agree that PDC may use email instead of U.S. mail for all written correspondence about this complaint.

E-mail address: pamroach@aol.com

Your name (print or type):
PAM ROACH

Street address:
22102 S.E. Green Valley Rd.

City, state and zip code:
Auburn, WA 98092

Telephone number (including area code):
253-735-4210

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 2014 AUG - 8 PM 2:09
 WASHINGTON

Oath

Required for complaints against elected officials or candidates for elective office:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.*

Your signature PAM ROACH

Date signed Aug. 8 '14

Place signed (city and county)
Olympia Thurston
 City County

Attachments

Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint.

*RCW 9A.72.040 says 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."

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2014 AUG -3 PM 12:09

Introduction

There are dozens of PDC violations by the campaign of Catherine Dahlquist who is running for the Washington State Senate from the 31st District.

The most serious violation is she illegally spent over \$10,000 of general election money in the primary – over one-half of the general election money she collected before the primary. She fails to report any advertising expenditure by correctly identifying the purpose of the expenditure or the subcontractor who actually did the work.

The reimbursing back and forth between her campaign and the campaign for Christopher Hurst, who is running for the state house in the 31st District, makes it impossible for the public to determine how money is being spent and for what purpose. It is impossible to determine if their joint expenditures are being split 50/50 or if Hurst is illegally subsidizing her campaign. It appears the Dahlquist campaign is trying to deceive the public by failing to report properly.

For example, Hurst paid a total of \$29,586.80 for newspaper advertising. However, Ms. Dahlquist's total reimbursement for \$9,301.62. That is not half of the \$29,586.62 if all the ads were joint ads but without seeing the actual invoices and ad copy one cannot make a determination.

In addition, the reimbursement from Hurst to Dahlquist for the shoot for the TV commercial along with other production costs do not appear to be split 50/50 and can only be determined by reviewing the actual invoices and commercials.

Finally, Hurst's C-4 for the period of June 1 to July 14, 2014 lists an in-kind contribution from the House Democratic Campaign Committee (HDCC) for \$24,600 for polling. A memo from the pollster indicated questions about Dahlquist's race were asked in the poll. Since the joint Hurst-Dahlquist advertising benefitted from the poll, Dahlquist should have listed an in-kind contribution from the House Democratic Campaign Committee on her PDC.

The only way to determine just how serious Dahlquist's violations are is for the PDC to thoroughly examine all of the Hurst and Dahlquist records to determine exactly what happened and if there are many more violations that cannot be determined simply by examining PDC reports filed by the candidates.

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Dahlquist C-4 for the period of April 2, to April 30, 2014 2014 AUG -8 PM 12: 09

1. Her campaign reports reimbursing the Christopher Hurst campaign a total of \$10,315.70 during the course of the campaign. However the reports fail to indicate the type of advertising but some of it was most likely for newspaper ads paid for by Hurst. Hurst paid a total of \$26,166.80 to Sound Publishing in April for some of these ads. Dahlquist's campaign failed to list a liability for her portion of the newspaper advertising.

Dahlquist C-4 for the period of May 1 to May 31, 2014

1. Hurst paid \$3,420 to Sound Publishing for newspaper advertisements on May 14, 2014. If some or all of this newspaper advertising was for her she failed to list it as a liability on this report.
2. Dahlquist lists an expenditure of \$4,702.28 to Green Light Strategies for "Marketing" on May 12, 2014 and failed to list the type of marketing – was it printing, internet ads, mailing, etc.? She also fails to provide the name of the subcontractor the consultant hired to perform this work as required.

Dahlquist C-4 for the period of June 1 to July 14, 2014

1. She lists an expenditure of \$20,000 to Green Light Strategies for "Advertising" on July 3, 2014 and failed to list the type of advertising – was it printing, internet ads, cable TV, mailing, etc. and also fails to provide the name of the subcontractor the consultant hired to perform this work as required.
2. She lists an expenditure of \$575.25 to Citizens for Christopher Hurst on July 7, 2014 as reimbursement for campaign advertising. She fails to report the type of and also fails to provide the name of the subcontractor the consultant hired to perform this work as required.
3. She lists an expenditure of \$1,366.85 to Citizens for Christopher Hurst on July 7, 2014 as reimbursement for campaign advertising. She fails to report the type of and also fails to provide the name of the subcontractor the consultant hired to perform this work as required.
4. She lists an expenditure of \$408.86 to Citizens for Christopher Hurst on July 7, 2014 as reimbursement for campaign advertising. She fails to report the type of and also fails to provide the name of the subcontractor the consultant hired to perform this work as required.

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5. She lists a second expenditure of \$408.86 to Citizens for Christopher Hurst on July 7, 2014 as reimbursement for campaign advertising. She fails to report the type of and also fails to provide the name of the subcontractor the consultant hired to perform this work as required.
6. She lists an expenditure of \$20,000 to Green Light Strategies for "Advertising" on July 8, 2014 and failed to list the type of advertising – was it printing, internet ads, cable TV, mailing, etc.? And, she also fails to provide the name of the subcontractor the consultant hired to perform this work as required.
7. She lists an expenditure of \$1,635.48 to Citizens for Christopher Hurst on July 11, 2014 as reimbursement for campaign advertising. She fails to report the type of and also fails to provide the name of the subcontractor the consultant hired to perform this work as required.
8. She lists an expenditure of \$1,635.42 to Citizens for Christopher Hurst on July 11, 2014 as reimbursement for campaign advertising. She fails to report the type of and also fails to provide the name of the subcontractor the consultant hired to perform this work as required.
9. She lists an in-kind contribution on June 27, 2014 of \$950 from Kelley Farm for the rental of the farm barn as an in-kind contribution from Kelley Farm for the primary. Then she lists another in-kind contribution on June 27, 2014 of \$950 from Kelley Farm for the rental of the farm barn as an in-kind contribution from Kelley Farm for the general. According to the farm's website the cost to rent the barn is \$2,500 Monday through Thursday and \$5,500 on Friday, Saturday and Sunday. Therefore, the Dahlquist campaign spent a general election in-kind contribution in the primary.
10. If the event at Kelley Farm was held on the June 27, 2014 as reported on her Schedule B the event was held on a Friday and the cost should have been \$5,500 and the in-kind value of the contribution was significantly under-reported. (<http://www.thekelleyfarm.com/rates.html>)
11. She lists an in-kind contribution of \$600 from Sandy Corliss for rental of the Kelley Farm on June 27, 2014 and lists the address for Ms. Corliss as for the Kelley Farm. Since Ms. Corliss is apparently the owner of the farm and is the sole proprietor of the farm, the Dahlquist campaign may have exceeded the \$950 contribution limit for the primary.
12. She lists an in-kind contribution on June 27, 2014 of \$950 to John Curley Auctioneer attributable to the primary and another in-kind contribution from John Curley Auctioneer on June 27, 2014 for another \$950 for the general. Therefore, Dahlquist

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spent general election money in the primary. Mr. Curley's website does not list the cost of his services.

13. Her C-4 for the period of July 15, 2014 to July 28, 2014 lists the following expenditure on July 28, 2014 all to Green Light Strategies – for \$4,046 for “Advertisement Post Production”; 14 for \$3,500 for “Campaign Ad Production” and a third one for \$700 for “Campaign Ad Shoot”. Since some of these expenditures were probably done or at least “ordered” before July 14, 2014 they should have been reported as a liability on this C-4.
14. Her C-4 for the period of July 15, to July 28, 2014 lists two reimbursements to Citizens for Christopher Hurst for advertising. If this was reimbursement for the advertising Hurst reserved in April and May, it should have been listed as a liability on this report.

Dahlquist C-4 for the period of July 15 to July 28, 2014

1. She lists an expenditure of \$1,635.42 to Citizens for Christopher Hurst on July 21, 2014 as reimbursement for campaign advertising. She fails to report the type of and also fails to provide the name of the subcontractor the consultant hired to perform this work as required.
2. She lists another expenditure of \$1,635.42 to Citizens for Christopher Hurst on July 21, 2014 as reimbursement for campaign advertising. She fails to report the type of and also fails to provide the name of the subcontractor the consultant hired to perform this work as required.
3. She lists the following expenditure on July 28, 2014 all to Green Light Strategies – for \$4,046 for “Advertisement Post Production”; 14 for \$3,500 for “Campaign Ad Production” and a third one for \$700 for “Campaign Ad Shoot” and fails to list the subcontractor.
4. Line 18 of this report lists “Cash on Hand” of \$2,223.45. A review of her contributions shows approximately \$21,045.28 was “General Election” money. A cash on hand balance of \$2,223.45 means she spent means she spent \$18,821.83 of general election money in the primary. However, she did receive a contribution of \$950 on July 28th that she had not deposited and two reimbursements from Mr. Hurst one for \$1,750 on July 21 and another for \$7,500 July 10, 2014 so if these three deposits are subtracted the total shows she illegally spent \$8,621.83 but then you need to add the \$950 in-kind general contributions from Kelley Farm and Mr. Curley so she illegally spent \$10,521.83 of general election money. (On Mr. Hurst's C-4 he reports a reimbursement of \$1,700 to the Dahlquist campaign not the \$1,750 she reports and is another example of the terrible accounting practices of Ms. Dahlquist's treasurer).

5. She fails to report any liabilities at the end of this reporting period when most likely there were some things ordered but not yet paid or reimbursed to Mr. Hult

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PUBLIC RELATIONS DIVISION

Phil Stutzman

From: Cathy Dahlquist [cathydahlquist@comcast.net]
Sent: Tuesday, September 30, 2014 3:57 PM
To: Phil Stutzman
Cc: Tony Perkins; Jacob Berkey
Subject: PDC case No. 15-036
Attachments: PDC response to complaint T15-026 T15-033 REV 3.docx; Primary General Campaign Expenses-Pre Primary Contributions-Transfers July 2014 Dahlquist-REV 3.xlsx; Dahlquist Primary Cable Invoice.pdf

Dear Mr. Stutzman,

Attached is our response to PDC Case No. 15-036. Your letter indicates 2 requests for additional information. The first being a response to the allegations concerning and "alleged failure to fully disclose contributions and expenditure, including in-kind contributions, monetary expenditures, debts and obligations" for both complaints. The second requests was for explanations of "what you purchased before the primary with general election funds and when and how these goods or services were used".

Our campaign has been very forthcoming and prompt with all campaign contributions and expenditures and have ensured a high level of integrity with every entry that has been made. The intent has always been to comply with all PDC rules and laws, if the slightest detail was left off a form, the campaign was quick to clarify and amend the appropriate form. We believe that our campaign has been extremely transparent and honest with the public.

Please let me know if there is any additional information required.

Kind regards,
Cathy Dahlquist



This email is free from viruses and malware because avast! Antivirus protection is active.

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Philip Stutzman
State of Washington
Public Disclosure Commission
711 Capitol Way Room 206
PO Box 40908
Olympia, WA 98504-0908

Electronically submitted September 30, 2014

Dear Mr. Stutzman,

I am in receipt of complaint T15-026 & T15-033, PDC case No, 15-036, filed by Pam Roach.

I responded to the complaints on August 20, 2014, in a timely and efficient manner providing the PDC with a spreadsheet detailing both primary and general election contributions and expenses and how exactly they were split in an appropriate manner. In answering the PDC question as to what was purchased before the primary with general election funds and when and how these goods or services were used, I found the clarification question confusing as the expenses are very straightforward. Nonetheless, I added detail to each category for your understanding.

Please see the attached spreadsheet detailing primary election and general election expenses that will clarify any questions in regards to the allegations lodged by my opponent.

Many campaign advertising activities have been secured for the general election (see attached spreadsheet with additional detail) and therefore qualify as a general election expense. It is important in a busy campaign season to secure the most sought after advertising in advance, while purchasing the printing and video production in a package, as it is the most cost effective use of campaign funds.

In regards to specific inquires to the complaint regarding the C-4 filed for the April 2-30, 2014 period; NO liability was incurred since a decision to purchase ½ of a newspaper ad from Hurst campaign was made on a weekly basis based on if our campaign had the available funds.

In regards to specific inquires to the complaint regarding the C-4 filed for the May 1-31, 2014 period; NO liability was incurred since a decision to purchase ½ of a newspaper ad from Hurst campaign was made on a weekly basis based on if our campaign had the available funds.

In regards to specific inquires to the complaint regarding the C-4 filed for the May 1-31, 2014 period; the expenditure to GLS (Green Light Strategies) was split 50/50 for general/primary printing of flyers which the memo description appropriately details. GLS produces their own TV advertising and/or purchases

directly from their vendor and billed directly to our campaign. To my knowledge no subcontractor has been used for these services.

In regards to specific inquires to the complaint regarding the C-4 filed for the June 1-July 14, 2014 period; advertising was purchased for cable TV which is appropriately detailed in the memo/description box. GLS purchases directly from their vendor (see attached bill from GLS) and billed directly to our campaign.

In regards to specific inquires to the complaint regarding the C-4 filed for the June 1-July 14, 2014 period; expenditures to the Citizens for Christopher Hurst campaign are detailed in the memo/description box and list canvas, letters, and newspaper ads.

In regards to specific inquires to the complaint regarding the C-4 filed for the June 1-July 14, 2014 period; the in-kind contribution from Kelly Farms and Sandy Corliss are all split 50/50 between general/primary. Sandy Corliss is not the sole proprietor of the Kelley Farm. The event was held on Wednesday, June 25, 2014.

In regards to specific inquires to the complaint regarding the C-4 filed for the June 1-July 14, 2014 period; John Curley Auctioneers sets his rates per event and donated his services at the rate of \$1900 which were split 50/50 between general/primary since general/primary dollars were raised at the event.

In regards to specific inquires to the complaint regarding the C-4 filed for the June 1-July 14, 2014 period; expenditures to GLS were all paid when the bill was received on July 21, 2014, NO liability was incurred by the campaign.

In regards to specific inquires to the complaint regarding the C-4 filed for the July 15-28, 2014 period; expenditures to the Citizens for Christopher Hurst campaign are detailed in the memo/description box and list canvas, letters, and newspaper ads.

In regards to specific inquires to the complaint regarding the C-4 filed for the July 15-28, 2014 period; work was performed by GLS and is appropriately detailed in the memo/description box.

Once again, our campaign is and has always been in full compliance of campaign laws. At the time Pam Roach was filing these complaint she could have reviewed our open and transparent campaign books prior to the primary election and would have seen that this is exactly what was done. Instead, she chose to file frivolous complaints for political purposes.

If you have any further questions in regards to our campaign and the forms filed please don't hesitate to call or write and we will get that information to you ASAP.

Cathy Dahlquist

Committee to Elect Cathy Dahlquist

1348 Florence St.

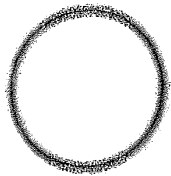
Enumclaw, WA 98022

2014 Cathy Dahlquist Campaign
 Primary General Campaign Expenses
 (Submitted by Dahlquist campaign 9/30/14)

Date	Vendor	Total Expense	General Expense	Description
4/30/2014	Visual Studios	\$150.00	\$75.00	website
4/30/2014	Spectrum Signs	\$1,359.99	\$680.00	campaign signs
5/29/2014	Sears	\$93.00	\$46.50	sign tools
5/29/2014	Office Depot	\$217.59	\$108.80	office supplies
5/13/2014	Moonshadow	\$860.00	\$430.00	software update
5/2/2014	Spectrum Signs	\$1,359.99	\$1,359.99	double entry delete
5/12/2014	Green Light Strategies	\$4,702.38	\$2,351.19	flyers
6/6/2014	Arrow Lumber	\$64.72	\$32.36	sign stakes
6/6/2014	Arrow Lumber	\$178.70	\$89.35	sign stakes & screws
6/12/2014	Print NW	\$105.00	\$52.00	printing
6/12/2012	Mama Sortini's	\$500.00	\$250.00	fundraising for primary & general
6/12/2014	Print NW	\$207.76	\$103.88	printing invitations
6/13/2014	Arrow Lumber	\$64.72	\$64.72	double entry delete
6/23/2014	Gales Creek Insurance	\$395.00	\$197.50	fundraiser insurance
6/24/2014	Mama Sortini's	\$1,600.48	\$800.24	fundraiser general/primary
7/11/2014	Print NW	\$462.64	\$231.32	fundraiser general/primary
7/11/2014	Print NW	\$317.26	\$79.32	fundraiser (only 1/4 reimbursed from Hurst campaign for 1/2)
7/14/2014	Capital City Printer	\$445.26	\$222.63	printing letterhead
6/6/2014	Spectrum Signs	\$3,197.40	\$1,598.70	signs
6/12/2014	Print NW	\$207.76	\$207.76	double entry delete
7/28/2014	Green Light Strategies	\$4,046.00	\$2,023.00	video production of both
7/28/2014	Green Light Strategies	\$3,500.00	\$1,750.00	video shoot for both
7/28/2014	Spectrum Signs	\$647.15	\$647.15	general election endorsement signs
7/28/2014	Green Light Strategies	\$700.00	\$350.00	remainder of video shoot for both
7/28/2014	Enumclaw Stationers	\$74.92	\$37.46	printer cartridge
	Totals	\$25,457.72	\$13,788.87	

2014 Cathy Dahlquist Campaign
 Primary General Campaign Expenses
 (Submitted by Dahlquist campaign 9/30/14)

Additional Description
website used for both general/primary election
1/2 signs stored & saved for general election
stakes for general/primary election signs (general stored)
bulk paper/printer cartridges used for g/p (general stored)
software used for doorbelling in general & primary
correction
1/2 flyers stored for delivery after primary (general stored)
stakes for general/primary election signs (general stored)
stakes for general/primary election signs (general stored)
printing for general/primary fundraiser (general stored)
food for general/primary fundraiser
invitations for general/primary fundraiser
correction
insurance for general/primary fundraiser
food for general/primary fundraiser
invitations for general/primary fundraiser
invitations for general/primary fundraiser
letterhead for general/primary (general stored)
1/2 signs stored & saved for general election
correction
video production of both general/primary ad (general saved)
video shoot of both general/primary ad
endorsement signs used only for general election (stored)
video shoot of both general/primary ad (general saved)
printing for general/primary fundraiser (general stored)



Green Light
strategies

Bill To
Cathy Dahlquist

Invoice

Date	Invoice #
6/29/2014	1043

Item Code	Description	Amount
Broadcast Media	Primary Cable Buy	17,000.00
Commission Income	Greenlight Commission	3,000.00

Please remit payment to Green Light Strategies
14751 N. Kelsey St. Ste 105 #616
Monroe, WA 98272

Total	\$20,000.00
Balance Due	\$20,000.00

All-Wks Avrg	Rate \$\$.00	Start Date	End Date	Wk 1 - Wk 5						Wk 1 7/7 '14	Wk 2 7/14 '14	Wk 3 7/21 '14	Wk 4 7/28 '14	Wk 5 8/4 '14
				Women 35-54			Adults 35+							
				Rtg	Rch %	Freq	Rtg	Rch %	Freq					
Seattle-Tacoma Nov13 C-DMA Nielsen Live+7	\$8760.00			0.2	41.0%	2.0	0.3	52.8%	2.3	138	68	68	18	
8474, F Way/Aub/Kent	\$1706.00			0.4	21.5%	1.4	0.6	29.7%	1.5	71				
Tu-F 9a-4p	\$32.00			0.2	1.1%	1.2	0.5	3.4%	1.2	8				
MNBC-TV	\$4.00	7/8/14	8/4/14	0.2	1.1%	1.2	0.5	3.4%	1.2	8				
Tu-F 4p-7p	\$411.00			0.4	6.3%	1.1	0.6	10.1%	1.2	19				
BRVO-TV	\$16.00	7/8/14	8/4/14	0.3	1.3%	1.2	0.2	0.9%	1.2	5				
ESPN-TV	\$32.00	7/8/14	8/4/14	0.2	0.4%	1.1	0.5	1.5%	1.1	3				
HALL-TV	\$20.00	7/8/14	8/4/14	0.6	1.6%	1.1	0.6	1.8%	1.1	3				
HGTV-TV	\$25.00	7/8/14	8/4/14	0.6	1.8%	1.1	0.6	1.7%	1.1	3				
MNBC-TV	\$20.00	7/8/14	8/4/14	0.3	1.4%	1.2	1.1	4.6%	1.2	5				
Tu-Su 7p-12m	\$1053.00			0.5	15.9%	1.1	0.7	20.3%	1.2	34				
BRVO-TV	\$35.00	7/8/14	8/4/14	0.6	2.3%	1.1	0.5	2.0%	1.1	4				
DISC-TV	\$40.00	7/8/14	8/4/14	0.7	1.9%	1.0	1.1	3.1%	1.0	3				
HALL-TV	\$33.00	7/8/14	8/4/14	0.9	4.2%	1.1	1.2	5.4%	1.1	5				
HGTV-TV	\$30.00	7/8/14	8/4/14	0.5	1.5%	1.1	0.9	2.6%	1.1	3				
HIST-TV	\$41.00	7/8/14	8/4/14	0.6	1.1%	1.0	1.0	2.0%	1.0	2				
LIF-TV	\$42.00	7/8/14	8/4/14	0.7	2.0%	1.0	0.6	1.6%	1.0	3				
MNBC-TV	\$18.00	7/8/14	8/4/14	0.1	0.6%	1.2	0.3	1.9%	1.2	8				
TLC-TV	\$22.00	7/8/14	8/4/14	0.6	1.8%	1.1	0.5	1.6%	1.1	3				
TNT-TV	\$40.00	7/8/14	8/4/14	0.5	1.5%	1.1	0.7	1.8%	1.1	3				
Sa-Su 9a-7p	\$210.00			0.3	2.6%	1.0	0.4	3.5%	1.1	10				
HALL-TV	\$30.00	7/8/14	8/4/14	0.8	1.5%	1.0	1.2	2.4%	1.0	2				
MNBC-TV	\$20.00	7/8/14	8/4/14	0.0	0.2%	1.2	0.1	0.5%	1.2	6				
TLC-TV	\$15.00	7/8/14	8/4/14	0.5	0.9%	1.0	0.3	0.6%	1.0	2				
5276, Pierce County East	\$7054.00			0.5	61.3%	2.2	0.7	77.0%	2.7	67	68	68	18	
IM-F 9a-4p	\$80.00			0.1	2.0%	1.4	0.5	7.1%	1.4	6	6	6	2	
MNBC-TV	\$4.00	7/8/14	8/4/14	0.1	2.0%	1.4	0.5	7.1%	1.4	6	6	6	2	

	Rate \$\$.00	Start Date	End Date	Wk 1 - Wk 5						Wk 1 7/7 '14	Wk 2 7/14 '14	Wk 3 7/21 '14	Wk 4 7/28 '14	Wk 5 8/4 '14
				Women 35-54			Adults 35+							
				Rtg	Rch %	Freq	Rtg	Rch %	Freq					
M-F 4p-7p	\$995.00			0.5	21.4%	1.4	0.9	33.4%	1.6	18	17	17	5	
BRVO-TV	\$15.00	7/8/14	8/4/14	0.4	3.2%	1.4	0.3	2.2%	1.4	4	3	3	1	
ESPN-TV	\$32.00	7/8/14	8/4/14	0.9	7.1%	1.2	1.7	13.7%	1.2	3	3	3	1	
HALL-TV	\$15.00	7/8/14	8/4/14	0.6	4.7%	1.3	0.7	5.3%	1.3	3	3	3	1	
HGTV-TV	\$20.00	7/8/14	8/4/14	0.7	5.1%	1.3	0.7	5.3%	1.3	3	3	3	1	
MNBC-TV	\$10.00	7/8/14	8/4/14	0.3	3.2%	1.5	1.1	11.9%	1.5	5	5	5	1	
M-Su 7p-12m	\$4194.00			0.5	42.3%	1.6	0.7	52.4%	1.7	37	37	37	11	
BRVO-TV	\$52.00	7/8/14	8/4/14	0.8	10.5%	1.4	0.7	9.4%	1.4	6	6	6	2	
DISC-TV	\$45.00	7/8/14	8/4/14	0.6	5.5%	1.2	1.1	9.2%	1.2	3	3	3	1	
HALL-TV	\$26.00	7/8/14	8/4/14	0.9	7.2%	1.2	1.1	9.4%	1.2	3	3	3	1	
HGTV-TV	\$52.00	7/8/14	8/4/14	0.6	7.5%	1.4	1.0	11.6%	1.4	5	5	5	1	
HIST-TV	\$27.00	7/8/14	8/4/14	0.6	4.7%	1.2	1.0	8.2%	1.2	3	3	3	1	
LIF-TV	\$33.00	7/8/14	8/4/14	0.7	5.8%	1.2	0.6	4.8%	1.2	3	3	3	1	
MNBC-TV	\$12.00	7/8/14	8/4/14	0.1	1.4%	1.6	0.3	4.8%	1.6	8	8	8	2	
TLC-TV	\$30.00	7/8/14	8/4/14	0.6	5.0%	1.2	0.6	4.6%	1.2	3	3	3	1	
TNT-TV	\$40.00	7/8/14	8/4/14	0.5	3.7%	1.4	0.8	5.6%	1.4	3	3	3	1	
Tu-F 9a-4p	\$24.00			0.2	0.9%	1.1	0.5	2.8%	1.1	6				
MNBC-TV	\$4.00	7/8/14	8/4/14	0.2	0.9%	1.1	0.5	2.8%	1.1	6				
Tu-F 4p-7p	\$326.00			0.4	6.6%	1.1	0.6	10.6%	1.2	19				
BRVO-TV	\$15.00	7/8/14	8/4/14	0.3	1.3%	1.2	0.2	1.0%	1.2	5				
ESPN-TV	\$32.00	7/8/14	8/4/14	0.2	0.5%	1.1	0.5	1.5%	1.1	3				
HALL-TV	\$15.00	7/8/14	8/4/14	0.6	1.6%	1.1	0.6	1.8%	1.1	3				
HGTV-TV	\$20.00	7/8/14	8/4/14	0.7	1.9%	1.1	0.7	1.9%	1.1	3				
MNBC-TV	\$10.00	7/8/14	8/4/14	0.3	1.5%	1.2	1.1	4.8%	1.2	5				
Tu-Su 7p-12m	\$1115.00			0.5	15.9%	1.1	0.7	21.1%	1.2	34				
BRVO-TV	\$52.00	7/8/14	8/4/14	0.7	1.9%	1.1	0.6	1.6%	1.1	3				
DISC-TV	\$45.00	7/8/14	8/4/14	0.7	1.9%	1.0	1.1	3.1%	1.0	3				
HALL-TV	\$26.00	7/8/14	8/4/14	0.9	2.7%	1.1	1.2	3.4%	1.1	3				
HGTV-TV	\$52.00	7/8/14	8/4/14	0.6	2.5%	1.1	1.0	4.4%	1.1	5				
HIST-TV	\$27.00	7/8/14	8/4/14	0.6	1.8%	1.1	1.1	3.1%	1.1	3				

	Rate \$\$.00	Start Date	End Date	WK 1 - WK 5																
				Women 35-54					Adults 35+											
				Rtg	Ch %	Freq	Rtg	Ch %	Freq	Rtg	Ch %	Freq	Rtg	Ch %	Freq					
LIF -TV	\$33.00	7/8/14	8/4/14	0.7	2.1%	1.0	0.6	1.7%	1.0	3										
MNBC-TV	\$12.00	7/8/14	8/4/14	0.1	0.6%	1.2	0.3	2.0%	1.2	8										
TLC -TV	\$30.00	7/8/14	8/4/14	0.7	1.9%	1.1	0.6	1.7%	1.1	3										
TNT -TV	\$40.00	7/8/14	8/4/14	0.6	1.6%	1.1	0.7	2.0%	1.1	3										
Sa-Su 9a-7p	\$320.00			0.3	8.6%	1.3	0.4	11.3%	1.3	8										
HALL-TV	\$14.00	7/8/14	8/4/14	0.8	5.0%	1.2	1.2	8.2%	1.2	2										
MNBC-TV	\$8.00	7/8/14	8/4/14	0.0	0.5%	1.5	0.1	1.2%	1.5	4										
TLC -TV	\$10.00	7/8/14	8/4/14	0.5	3.4%	1.2	0.3	2.2%	1.2	2										
Total	\$8760.00			0.2	41.0%	2.0	0.3	52.8%	2.3	138	69	68	68	18						

Market Summary	WK 1 - WK 5					WK 1 - WK 5							
	Women 35-54					Adults 35+							
Tot \$	Unit	Tot	CPP	GRP	Rch %	Freq	Tot \$	Unit	Tot	CPP	GRP	Rch %	Freq
\$8760	361	\$106	82.3	41.0%	2.0	\$8760	361	\$72	122.2	52.8%	2.3		
Total	\$8760	361	\$106	82.3	41.0%	2.0	\$8760	361	\$72	122.2	52.8%	2.3	

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 Adjustments: Network, Insertability and Network Carriage have been factored into calculations.
 Seattle-Tacoma Nov13 C-DMA Nielsen Live+7
 Cable Zones: COMCAST, F Way/Aub/Kent
 Seattle-Tacoma Nov13 C-DMA Nielsen Live+7
 Cable Zones: COMCAST, Pierce County East

Rates based on a :30 spot length; Rates valid for 7 days past submission date.

Crystal Daily - Regional Account Executive - Comcast Spotlight Seattle (206) 270 - 4764

All-Wks Avrg	Rate \$\$\$	LUR \$	RC %	Wk 1 - Wk 5						Wk 1 7/7 '14	Wk 2 7/14 '14	Wk 3 7/21 '14	Wk 4 7/28 '14	Wk 5 8/4 '14
				Women 35-54			Adults 35+							
				Rtg	Rch %	Freq	Rtg	Rch %	Freq					
Seattle-Tacoma Nov13 C-DMA Nielsen Live+7	\$8240.00			0.5	50.3%	1.8	0.8	65.5%	2.1	52	54	52	15	
8474, F Way/Aub/Kent	\$8240.00			0.5	50.3%	1.8	0.8	65.5%	2.1	52	54	52	15	
M-F 9a-4p	\$110.00			0.1	1.2%	1.2	0.5	4.3%	1.2	3	4	3	1	
MNBC-TV	\$10.00		100%	0.1	1.2%	1.2	0.5	4.3%	1.2	3	4	3	1	
M-F 4p-7p	\$1690.00			0.6	17.4%	1.4	1.0	28.5%	1.5	12	13	12	4	
MNBC-TV	\$40.00		100%	0.3	2.3%	1.4	1.1	8.7%	1.4	3	4	3	1	
ESPN-TV	\$55.00		100%	0.8	6.7%	1.2	1.6	12.9%	1.2	3	3	3	1	
HALL-TV	\$30.00		100%	0.6	4.7%	1.3	0.7	5.3%	1.3	3	3	3	1	
HGT-TV-TV	\$40.00		100%	0.6	4.8%	1.3	0.7	5.0%	1.3	3	3	3	1	
M-Su 7p-12m	\$5990.00			0.6	40.3%	1.5	0.7	49.7%	1.6	33	33	33	10	
MNBC-TV	\$30.00		100%	0.1	1.0%	1.4	0.3	3.4%	1.4	5	5	5	2	
HALL-TV	\$50.00		100%	0.9	10.3%	1.4	1.1	13.4%	1.4	5	5	5	1	
HGT-TV-TV	\$55.00		100%	0.6	5.0%	1.2	0.9	7.6%	1.2	3	3	3	1	
BRVO-TV	\$55.00		100%	0.7	8.5%	1.4	0.6	7.6%	1.4	5	5	5	1	
DISC-TV	\$70.00		100%	0.6	5.5%	1.2	1.1	9.2%	1.2	3	3	3	1	
HIST-TV	\$80.00		100%	0.5	4.4%	1.2	0.9	7.7%	1.2	3	3	3	1	
LIF-TV	\$65.00		100%	0.6	5.5%	1.2	0.5	4.6%	1.2	3	3	3	1	
TLC-TV	\$35.00		100%	0.6	4.7%	1.2	0.5	4.3%	1.2	3	3	3	1	
TNT-TV	\$75.00		100%	0.5	3.5%	1.4	0.7	5.3%	1.4	3	3	3	1	
Sa-Su 9a-7p	\$450.00			0.4	4.2%	1.2	0.7	7.0%	1.2	4	4	4		
MNBC-TV	\$30.00		100%	0.0	0.2%	1.2	0.1	0.5%	1.2	2	2	2		
HALL-TV	\$45.00		100%	0.8	4.0%	1.2	1.2	6.5%	1.2	2	2	2		
Total	\$8240.00			0.5	50.3%	1.8	0.8	65.5%	2.1	52	54	52	15	

Market Summary	Wk 1 - Wk 5						Wk 1 - Wk 5								
	Women 35-54			Adults 35+			Women 35-54			Adults 35+					
	Tot \$\$\$	Unit	GRP	Rch %	Freq	Tot \$\$\$	Unit	GRP	Rch %	Freq	Tot \$\$\$	Unit	GRP	Rch %	Freq
Seattle-Tacoma Nov13 C-DMA Nielsen Live+7	\$8240	173	\$91	90.5%	1.8	\$8240	173	\$62	133.7%	2.1	\$8240	173	\$62	133.7%	2.1
Total	\$8240	173	\$91	90.5%	1.8	\$8240	173	\$62	133.7%	2.1	\$8240	173	\$62	133.7%	2.1

Cathy Dahlquist Interview summary

August 3, 2015: In-Person Investigative Interview

PDC Case No. 15-036

Ms. Dahlquist stated that for 2014 and in her prior House campaigns, she evenly split campaign expenditures between the primary and general elections. She stated that when her campaign made expenditures for a specific election year, she did not think of it as a primary or general election expenditure.

Ms. Dahlquist acknowledged that the vendor invoices did not indicate whether or not expenditures were split between the 2014 primary and general elections, since that is not an issue she would have discussed with her vendors at the time the order was either placed or the goods/services provided. She added that the Online Reporting Campaign Assistance (ORCA), did not notify or prompt her campaign to designate an expenditure for a specific primary or general election.

Campaign fundraisers:

Ms. Dahlquist stated that she conducted two campaign fundraisers or fundraising events for her 2014 Senate campaign as described below:

1. June 24, 2014, a joint-campaign fundraiser was held with the 2014 Chris Hurst Campaign in which the proceeds (contributions) and expenditures were evenly split; and
2. A June 25, 2014, campaign fundraiser that was held at Kelly Farms.

Ms. Dahlquist stated the two fundraising expenditures made to Mama Stortini's on June 12 and 24, 2014, were for food for the June 25th fundraiser. Again, she did not think of the fundraiser in terms of being a primary or general election fundraiser, since her campaign expected to receive both primary and general election contributions at that fundraiser.

Ms. Dahlquist stated that at the time of the expenditures, her campaign did not think about the fundraising expenditures being only for the primary election, but for the 2014 election cycle. She stated that the fundraising expenditures to Print NW for fundraising invitations, and Gale's Creek Insurance were both related to the June 25, 2014, campaign fundraiser at Kelly Farms.

Political Advertisements:

Ms. Dahlquist was asked to discuss the campaign's process for separating, segregating, or storing 2014 primary and general election political advertisements, goods or services that were paid for with general election contributions prior to the primary being held. She stated that for most types of political advertisements such as yard signs and campaign flyers, it is advantageous for the campaign to order for the entire campaign at one time, if possible, because the campaign receives a "reduced bulk rate" for services.

Ms. Dahlquist stated the campaign yard signs from Spectrum Signs were used by the campaign for both the 2014 primary and general elections. She stated that the campaign signs were divided and stored in a portion of the room that she used as her campaign office. She stated the signs were constructed by her campaign as needed throughout the 2014 election cycle, and that approximately one-half of the signs were stored in her campaign office (along with the flyers and copier papers) until after the primary election had been held.

Ms. Dahlquist stated the general election signs were placed at new locations or replaced existing signs that had been damaged, stolen, or gone missing.

Ms. Dahlquist stated that she had discussions with her campaign staff and volunteers concerning the yard signs that included the strategic decision to not place all of the signs for the primary election. She did not take any photographs of the campaign office to document the yard signs, and other campaign items that were stored there. She indicated that at the time she did not think there was any reason to document that practice.

She noted there was one campaign expenditure for signs made prior to the 2014 primary election in July 2014 to Spectrum Signs (\$647), for an "Endorsed by" sign that was later attached to existing campaign yard signs after the primary election but prior to the general election being held. (Note – the drill purchased at Sears was used by the campaign to attach the signs). She stated that the campaign did order additional signs prior to the general election since so many of the campaign signs ended up missing that the signs stored for the general election had already been distributed.

Ms. Dahlquist stated the campaign flyers printed by Green Light Strategies on May 12, 2014 (referenced the invoice), was the main doorbelling piece she used for the entire 2014 election, and that she door-belled with the flyer for both the 2014 primary and general elections. She stated she targeted her door-belling activities using the Moonshadow software (see below) so she visited one set of registered voters for the primary election and a different set of registered voters for the general election. She stated that she did door-bell the same household twice so she used the same flyer for the entire election. The flyers were stored in the campaign office and used as needed, and she noted that they were divided pretty evenly between the 2014 primary and general elections.

Ms. Dahlquist stated the three expenditures to Green Light Strategies for the video shoot and production for three separate broadcast advertisements. She stated that one advertisement ran prior to the 2014 primary election only, and another advertisement ran prior to the 2014 general election. She stated the other advertisement, was a joint-campaign advertisement with the Chris Hurst campaign that ran prior to both the 2014 primary and general elections.

Ms. Dahlquist stated the campaign expenditures to Visual Studio's was for the campaign website, and that the expenditure included web-hosting fees for one-year and updates which occurred throughout the 2014 election cycle.

Ms. Dahlquist stated the campaign expenditure to Moonshadow was a subscription for campaign software specifically for the 31st Legislative District. She stated the software allowed the campaign to strategically micro-target precincts and voters for door-belling activities for both the 2014 primary and general elections. The software, which was used throughout the campaign, allowed the campaign to enter information or make notes about the voter such as issues discussed, support or opposition for the campaign, wants a yard sign, etc.... She stated she did not doorbell the same household twice, and that she probably door-belled close to the same number of households for the 2014 primary and general elections. Again she did not think of the expenditure as being made for either the primary or general election, but for the 2014 election.

Ms. Dahlquist stated the campaign expenditures to Sears was for a drill that was used throughout the 2014 campaign for construct and repair campaign yardsigns. She stated that the campaign signs do not fully constructed and that campaigns purchase the signs, stakes, lathes, and screws separately and then construct the signs.

Ms. Dahlquist stated that the two \$1,900 in-kind contributors that were received by the campaign from John Curley Auctioneers and Kelley Farms were both related to a June 25, 2014, fundraiser, and that there was only one fundraiser held.

Ms. Dahlquist stated that she knew both Mr. Curley and Sandy Corliss, the owner of Kelly Farms personally, and that she did not receive an invoice for the services provided. When asked how a "fair market value" was established for their services, she stated she did not have a discussion with either Mr. Curley or Ms. Corliss about the amount to report. She stated that she was not provided a specific dollar amount to report from either individual, so in the interest of disclosure she reported the maximum in-kind contribution for each contributor.

Ms. Dahlquist stated that after she received staff's July 2015 email, she reviewed the 2014 Statewide Executive and Legislative candidate reporting manual, and she found on page 44 language that stated a candidate can't accept general election goods or services, until after the primary election has been held. She understood at that time that it appeared likely that she had "over-reported" the amount for the services provided, which meant her campaign exceeded the 2014 primary contribution limits for both of those contributors.

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The Board of Directors is pleased to report that the company has achieved significant milestones in the past quarter. Our revenue has increased by 15% compared to the same period last year, and our customer base has grown by 10%. We have also successfully launched our new product line, which has received positive feedback from our customers.

In addition, we have implemented several strategic initiatives to improve our operational efficiency and reduce costs. These include streamlining our supply chain, optimizing our marketing spend, and investing in new technology. As a result, our profit margins have improved, and we are well-positioned for continued growth in the coming year.

We are confident that our strong performance in the past quarter is a reflection of the hard work and dedication of our employees. We will continue to focus on innovation and customer satisfaction to drive long-term success. Thank you to all our stakeholders for their support and trust in our company.