



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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June 30, 2021

Sent Electronically to Tanisha Harris and Marsha Manning, 2020 Campaign Treasurer

Subject: PDC Audit Report Cover Letter, 2020 Tanisha Harris for State Representative Campaign audit, PDC Audit No. 20-11

Ms. Harris and Ms. Manning:

This letter is to inform you that PDC staff has completed the limited-scope audit of the 2020 Tanisha Harris for State Representative Campaign (Campaign). Staff's audit found:

- The Campaign substantially complied with the candidate reporting requirements found in RCW 42.17A and WAC 390, concerning the timely and accurate filing of the Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) reviewed as part of this audit.
- Documentation provided for selected expenditures as part of the Campaign books of account verified the expenditure information disclosed on the Schedule A to C-4 reports.
- Practices concerning contribution and expenditure activities and internal control procedures were sound and properly facilitated the timely and accurate disclosure of activities undertaken by the Campaign during the 2020 election cycle.

Thank you both for fully cooperating with PDC staff concerning this audit. If you have questions, you may contact me by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,

Endorsed by:

s/ \_\_\_\_\_  
Electronically Signed Kurt Young,  
PDC Compliance Officer

s/ \_\_\_\_\_  
Electronically Signed Peter Lavallee,  
PDC Executive Director



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BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH  
RCW 42.17A

2020 Tanisha Harris for State  
Representative Campaign

Respondent.

PDC Audit No. 20-11

Audit Report

**I.**

**Audit Scope**

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

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

## II.

### **Audit: Respondent Background**

- On February 2, 2020, Tanisha Harris filed a Candidate Registration (C-1 report) declaring her candidacy for election to the office of State Representative in the 17th Legislative District, Position #1 in 2020, selecting the Full Reporting Option and listing Marsha Manning as the Ministerial Treasurer.
- On April 22, 2021, PDC staff sent an email to Ms. Harris and Ms. Manning, Ministerial Treasurer for the 2020 Tanisha Harris Campaign, and attached a letter notifying them that staff was conducting audits of four 2020 contested State Representative races as previously explained in an earlier email sent to both of them. The letter stated staff was conducting a limited-scope audit of the two 2020 candidates that ran for State Representative, Position #1 in the 17th Legislative District, which included Ms. Harris.
- The letter requested documentation maintained by the Campaign for selected expenditures made during the 2020 election cycle, in addition to a brief narrative concerning general contribution and expenditure campaign practices, including the record keeping of the campaign books of account in order to complete the audit work.
- As noted above, the audits provide the PDC and the public with an opportunity to determine the degree of compliance with the PDC reporting requirements, thereby enhancing and strengthening the public's confidence in the campaign finance information being disclosed by filers. The audits also assist in identifying areas in the reporting of campaign contribution and expenditure activities that may suggest a need to update or revise the advice on the PDC website in the PDC online candidate manuals, and from Filer Assistance staff, and areas of potential changes in the law or amendments made to the PDC rules to further clarify a specific reporting requirement.
- The limited-scope audits consist primarily of reviewing the Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by each Campaign, and queries conducted by PDC staff of the contribution and expenditure databases on the PDC website.
- The information is reviewed to determine the Campaigns timeliness and accuracy in disclosing contribution and expenditure activities undertaken on the C-3 and C-4 reports in accordance with the reporting requirements found in RCW 42.1A.235 and .240.

### **III.** **Audit Findings**

- The 2020 Tanisha Harris for State Representative Campaign (Campaign) disclosed receiving a total of \$366,900.66 in contributions and \$366,900.66 in total expenditures made during the 2020 election cycle as disclosed on the Final C-4 report filed on January 8, 2021.

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

- Candidates appearing on the 2020 primary and general election ballots who selected the Full Reporting option were required to file weekly C-3 reports every Monday beginning June 1, 2020 through the date of the general election, disclosing contributions that were received and deposited the previous seven days.
- Prior to June 1, 2020, candidates were required to file monthly C-3 reports for deposits of campaign contributions made during the month or period covered by the C-4 report.
- RCW 42.17A.220 requires candidates to timely deposit monetary contributions received into the campaign bank account or depository within five business days of receipt.
- For the 2020 election cycle, the Campaign filed C-3 reports disclosing contributions received covering the period February 2 through December 31, 2020, that included 1,282 separate monetary and in-kind contributions totaling \$366,900.66. The largest contributors to the 2020 Campaign included the following:
  1. 12 monetary and in-kind contributions totaling \$75,082.89 were received from the House Democratic Campaign Committee (HDCC) during the 2020 election, that included a \$60,000 monetary contribution received on September 12, 2020.
  2. Five in-kind contributions totaling \$73,878.84 were received from the Washington State Democratic Central Committee (WSDCC) during the 2020 election, that included three in-kind contributions totaling \$67,358.29 for three mailings received on October 13, 23, and 28, 2020 respectively.
  3. A \$5,000 monetary contribution was received from the Washington Senate Democratic Campaign on November 1, 2020.
- The Campaign disclosed receiving small un-itemized monetary contributions on line 1e on C-3 reports filed during the 2020 election totaling \$5,448.38.
- Based on the number of C-3 reports filed by the Campaign for the 2020 election, staff reviewed approximately every fourth C-3 report filed for contributions received and deposited beginning June 1, 2020, when the C-3 report accelerated reporting requirements began for 2020 candidates. Under that reporting requirement, C-3 reports are required to be filed every Monday for contributions received and deposited the preceding seven calendar days.
- The 2020 C-3 reports filed by the Campaign and reviewed by staff included the following:

<b>Date Received</b>	<b>Date Deposited</b>	<b># of contributors and description</b>	<b>Total C-3 Amount</b>	<b>C-3 Filing Date</b>	<b>Days Late</b>
6/5/2020	6/5/2020	Two-page C-3 report with 11 contributors that included a \$2,000 contribution from Harry Truman Fund, and a \$500 cont. from UCFW Local 365.	\$3,375	6/8/2020	0
6/12/2020	6/12/2020	Two-page C-3 report with 14 contributors that included a \$2,000 cont. from SEIU 1199 NW PAC & Persist PAC; and a \$1,000 cont. from the WA Federation of State Employees.	\$6,104	6/13/2020	0
6/24/2020	6/24/2020	Two-page C-3 report with eight contributors that included a \$2,000 cont. from Opportunity PAC.	\$2,900	6/28/2020	0
7/1/2020	7/1/2020	Two-page C-3 report with six contributors that included a \$2,000 cont. from The Kennedy Fund; a \$1,000 cont. from AFT WA COPE PAC, and PAC 48 of WA.	\$4,080	7/5/2020	0
7/11/2020	7/11/2020	One-page C-3 report with five contributors that included a \$2,000 cont. from Chris Stolte.	\$2,354.44	7/11/2020	0
7/22/2020	7/22/2020	Six-page C-3 report with 50 contributors that included nine \$1,000 cont.'s from individuals.	\$19,875	7/26/2020	0
8/4/2020	8/4/2020	One-page C-3 report that included a \$2,000 cont. from SEIU Local 49.	\$3,100	8/5/2020	0
8/19/2020	8/19/2020	One-page C-3 report with five contributors that included a \$1,000 cont. from Win With Women, Justice for All PAC, and Spokane Tribe of Indians.	\$3,150	8/23/2020	0
8/27/2020	8/27/2020	Two-page C-3 report with 11 contributors that included a \$1,000 cont. from SEIU 775 Quality Care PAC, and from an individual.	\$2,425	8/29/2020	0
9/3/2020	9/3/2020	Two-page C-3 report with 13 contributors that included a \$1,000 cont. from AFT WA COPE and WA Conservation Voters.	\$3,075	9/6/2020	0
9/12/2020	9/12/2020	One-page C-3 report with three contributors that included a \$60,000 cont. from the House Democratic Campaign Committee.	\$61,050	9/13/2020	0
9/24/2020	9/24/2020	Seven-page C-3 report with 71 contributors, all from individuals that included a \$1,000 cont.; a \$750 and \$500 cont.	\$10,450	9/26/2020	0
9/30/2020	9/30/2020	Two-page C-3 report with nine contributors that included a \$1,000 cont.'s from IAFF Local 452; Iron Workers District Council PNW; IUPAT; WA Machinists Council; & Planned Parenthood Votes!	\$6,775	10/3/2020	0
10/9/2020	10/9/2020	Two-page C-3 report with 11 contributors all from individuals that included two \$500 cont.'s.	\$2,325	10/11/2020	0
10/22/2020	10/22/2020	One-page C-3 report with six contributors that included a \$1,000 cont. from WA Indian Gaming Assn, and NW Regional County of Smart...	\$2,650	10/24/2020	0
10/30/2020	10/30/2020	One-page C-3 report with six contributors that included a \$1,000 cont. from Sustainable Future PAC.	\$2,552	11/1/2020	0
	<b>Totals</b>		<b>\$133,590.44</b>		

- PDC staff reviewed the 16 C-3 reports filed by the Campaign and listed in the chart above totaling \$133,590.44 which represented 36.4 percent of the \$366,900.66 in total contributions received during the 2020 election cycle. As noted in the table above, the Campaign timely filed all 16 of the C-3 reports reviewed by staff as part of this audit.
- In addition, the review verified that the Campaign timely deposited the contributions received within five business days of receipt in accordance with RCW 42.17A.220 for all 16 of the C-3 reports reviewed by staff as part of this audit.
- PDC staff downloaded the 2020 contribution database for the Campaign as a CSV file into an Excel spreadsheet, formatted and sorted the spreadsheet, and then conducted a review of the 2020 contributor information disclosed on C-3 reports.
- As part of that review, staff confirmed the Campaign complied with the 2020 election contribution limits which were \$1,000 for the primary and general elections for any individual, political committee, business, labor union, association, other entities and persons (other than the caucus political committees listed above).
- Staff’s review also indicated the Campaign disclosed the required Employer and Occupation information for 229 individuals totaling \$46,719.02, although staff noted that not all of the individuals contributed more than \$100 to the Campaign. In addition, the review indicated that the Campaign disclosed 209 individuals were listed as “Retired” and those individuals contributed a total of \$43,779.05 in contributions received.
- The PDC audit procedures included staff identifying contributors that made monetary contributions to the Campaign and then verifying or confirming the information disclosed for that specific contribution. For these audits, staff verified or confirmed selected contributions received by the Campaign by reviewing the expenditure reports of continuing political action committees (PAC) that were registered and required to file C-3 and C-4 reports with the PDC in CY 2020, that made contributions in 2020 to the Campaign.
- Staff reviewed the contribution spreadsheet and selected 10 PAC contributors that made monetary contributions totaling at least \$1,000 to the Campaign during the 2020 election and reviewed the corresponding C-3 reports filed by the Campaign disclosing each PAC contribution. The review included listing the date the contributions were received, the date the contributions were deposited, and the date the C-3 report was filed.
- Staff then reviewed the C-4 reports filed by the selected contributing PAC listed in the chart below for the corresponding contribution expenditure information disclosed on the Schedule A to C-4 report. The contribution information from the Campaign C-3 reports and the contribution expenditure information from the PAC C-4 reports was entered into the chart below and included the following:

<b>Date Rec'd by Campaign</b>	<b>Contributor name</b>	<b>Amount</b>	<b>C-3 Report Filed</b>	<b>Date Made By Donor on C-4 report</b>	<b>Disclosed by Donor</b>	<b>Days Rec'd After Made</b>
6/5/2020	Harry Truman Fund	\$2,000	6/8/2020	5/23/2020	C-4 report	13
6/12/2020	SEIU Healthcare 1199 NW PAC	\$2,000	6/13/2020	6/4/2020	C-4 report	8
7/1/2020	The Kennedy Fund	\$1,000	7/5/2020	6/24/2020	C-4 report	7

8/19/2020	Win with Women	\$1,000	8/23/2020	8/13/2020	C-4 report	6
8/27/2020	SEIU Quality Care PAC	\$1,000	8/29/2020	8/21/2020	C-4 report	6
9/3/2020	WA Conservation Voters	\$1,000	9/5/2020	8/25/2020	C-4 report	9
9/30/2020	WA Machinists Council	\$1,000	10/3/2020	9/18/2020	C-4 report	12
11/1/2020	WA State Democratic Campaign	\$5,000	12/9/2020	10/25/2020	C-4 report	6
10/22/2020	WA Indian Gaming Assn. PAC	\$1,000	10/24/2020	10/19/2020	C-4 report	3
10/17/2020	WA Assoc. of Realtors PAC	\$1,000	1/11/2021	10/8/2020	C-4 report	9

- The review indicated that the Campaign received and deposited all ten of the contributions selected for review within five business days of receipt as required by statute.
- As noted in the chart above, the Campaign disclosed the contributors' names for the 10 monetary contributions from the selected PAC's within three to 13 days after each PAC disclosed making the contributions. Staff based that information solely on the dates the expenditure for the contribution was disclosed as having been made by the PAC on the corresponding C-4 report, and the date the contribution was disclosed as having been received on the C-3 report filed by the Campaign.

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

- Candidates under the Full Reporting option in 2020 were required to file monthly C-4 reports by the 10th of each month disclosing contribution and expenditure activities incurred in the previous calendar month. Candidates appearing on the 2020 primary and general election ballots were required to file the following C-4 reports:
  1. A 21-day Pre-Primary Election C-4 report was due on July 14, 2020, covering the period June 1 through July 13, 2020.
  2. A 7-day Pre-Primary Election C-4 report was due on July 28, 2020, covering the period July 14 through July 27, 2020.
  3. A Post-Primary Election C-4 report was due by September 10, 2020, covering the period July 28 through August 31, 2020.
  4. A 21-day Pre-General Election C-4 report was due on October 13, 2020, covering the period September 1 through October 12, 2020.
  5. A 7-day pre-General Election C-4 report was due on October 27, 2020, covering the period October 13 through October 26, 2020.
  6. A Post-General Election C-4 report was due by December 10, 2020, covering the period October 27 through November 30, 2020.
- During 2020, the Campaign timely filed C-3 and C-4 reports throughout the year including the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports as detailed in the chart below.

<b>C-4 Report</b>	<b>Date Due</b>	<b>Date Filed</b>	<b>Contributions Received</b>	<b>Expenditures Made</b>	<b>Expenditure details</b>	<b>Days Late</b>
February 2020	3/10/2020	3/5/2020	\$8,136	\$272.81	Online vendor contribution processing fees and PO Box rental.	0
March 2020	4/10/2020	4/7/2020	\$1,880	\$86	Expenses of \$50 or less	0
April 2020	5/10/2020	5/9/2020	\$11,189.55	\$5,701.83	Four expenditures were made to Winpower Strategies (WPS) totaling \$4,000 that included \$2,000 for April retainer, \$1,081 to Capitol City Press for printing.	0
May 2020	6/10/2020	6/7/2020	\$16,934.17	\$6,478.83	A \$2,000 expenditure to WPS for May retainer and \$500 expenditure for website maintenance; \$1,500 for campaign wages to an individual; and \$1,074 IK-cont. from the candidate.	0
21-Day Pre-Primary Election C-4 report	7/14/2020	7/14/2020	\$37,945.68	\$10,102.06	A \$3,632.34 expenditure to Capitol City Press for postage; \$3,000 for campaign wages; and \$715 to NW Labor Press for print advertising.	0
7-Day Pre-Primary Election C-4 report	7/28/2020	7/31/2020	\$30,425.04	\$18,750.36	Two expenditures to WPS totaling \$13,013 that included \$7,013 for a mailer printed by Capitol City Press, and \$6,000 for digital ads; and a \$3,632.34 expenditure to Capitol City Press for postage.	3
2020 Post Primary C-4 report	9/10/2020	9/9/2020	\$27,060.33	\$23,472.85	Two expenditures to WPS totaling \$11,075 that included \$6,075 for a mailer printed by Capitol City Press, and \$5,000 for a digital media buy; \$6,000 in campaign wages for staff; and \$1,761.50 to Adco for yard signs.	0
21-Day Pre-General Election C-4 report	10/13/2020	10/13/2020	\$135,169.74	\$190,412.98	Three expenditures to WSP totaling \$150,000 that included two \$45,000 cable media buys on Oct 1 and 2 and a \$60,000 expenditure for digital advertising on 10/5; a \$8,182.41 expenditure to Capitol City Press for postage; and \$17,625 for IK cont that included \$12,500 from the HDCC and \$5,125 from the WSDCC, both for polling.	0
7-Day Pre-General Election C-4 report	10/27/2020	10/27/2020	\$58,399.47	\$60,931.37	Two IK cont from the WSDCC totaling \$42,815.73 for campaign mailers; and \$14,511.20 to WPS for a mailer	0



					w/work done by Capitol City Press.	
Post- General Election C-4 report	12/10/2020	12/9/2020	\$41,581.04	\$44,608.13	\$43,826 for an IK cont from the WSDCC for mailers; and \$12,000 for campaign wages, bonus and field work.	0

- The Campaign disclosed orders placed, debts or obligations on seven C-4 reports filed for the 2020 election cycle including the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports.
- There were seven small candidate in-kind contribution/loans made and disclosed during the 2020 Campaign totaling \$1,303.50. The in-kind contribution/loans were repaid by the Campaign on November 23, 2020.
- The C-4 reports timely disclosed expenditure information for payments made to vendors, largely involving political advertisements, and other miscellaneous Campaign services provided during the 2020 election cycle. The vendors receiving the largest Campaign expenditures during the 2020 election included the following:
  1. 22 expenditures were made to Winpower Strategies totaling \$203,524.20 for cable TV and broadcast advertising media buys, printing for mailers, digital advertisements and media buys, website maintenance, ad design and consulting/retainer.
  2. Seven expenditures totaling \$23,500 were made to Tiffany Burnette for Campaign wages, salary, and a bonus.
  3. Three expenditures were made to Capitol City Press totaling \$15,446.84 during the 2020 election for postage and handling for three mailers.
- As part of the audit, PDC staff requested the Campaign provide copies of the books of accounts maintained for the expenditures listed below that were made by the 2020 Campaign including supporting documentation such as invoices, receipts, cancelled checks, notes, emails, etc.
- On May 6, 2021, the PDC received an email from Marsha Manning, Campaign Ministerial Treasurer, that included PDF attachments providing the copies of the requested books of account documentation for the expenditures listed in the Audit letter. **Audit Exhibit #1.**
- Ms. Manning attached a letter responding to PDC staff’s questions concerning the 2020 campaign practices, contribution and expenditure processing procedures, and the maintenance of the campaign books of account. **Audit Exhibit #2.** In addition, Ms. Manning attached a 2020 Campaign spreadsheet to her email that she provided to staff to show how she documented the 2020 contribution and expenditure activities. (Note - the spreadsheet was not requested as part of the Audit and is not listed as an audit exhibit, but the spreadsheet was reviewed by staff for selected information and accuracy).
- The Campaign expenditures selected for review are detailed below and included a summary of each expenditure such as the date, amount and a description of the services disclosed on the C-4 reports. The summary was taken from copies of the books of account information provided by the Campaign, and included:

1. Staff requested campaign records and documentation for the following expenditures made by the 2020 Campaign to Winpower Strategies that included:
  - A \$60,000 expenditure on October 5, 2020 for “Digital Advertising.”
  - Two \$45,000 expenditures were made on October 1 and 2, 2020 for “Winpower Strategies, Cable Buy” totaling \$90,000.
  - A \$14,511.20 expenditure on October 22, 2020 for “Mailer: 36,278 pieces – Winpower \$600; Bluewave \$500; and Cap City Press \$13,411.”
  - A \$6,000 expenditure on July 15, 2020, for “Digital Ads.”
2. Three expenditures totaling \$15,446.84 to Capitol City Press that included a \$8,182.41 expenditure made on October 10, 2020 for “Mailer Postage”; a \$3,632.34 expenditure was made on July 12, 2020 for “Postage for Mailer”; and a \$3,632.09 expenditure was made on July 24, 2020, for “Handling and Postage for Mailer.”
3. Three expenditures to Rewired LLC totaling \$1,031.90 for “Texting Software” and “Texting Fees” that included \$665.83 on November 9, 2020; \$259.54 on August 7, 2020; and \$106.53 on September 12, 2020.
4. Three expenditures to the City of Vancouver totaling \$1,008 for “Senior Messenger Ad’s and “Messenger Ad” on October 10, 2020 for \$350; on May 26, 2020 for \$308; and on July 30, 2020.

**Expenditures to Winpower Strategies:**

A \$60,000 expenditure made on October 5, 2020 for “Digital Advertising”

- The documentation included a copy of Winpower Strategies Inc. (WPSI) Invoice #1747 made out to Tanisha Harris with an October 5, 2020 invoice and due date, and the Payment Terms listed as “Due on receipt”. The invoice stated “#40110 Consulting Tasks” under the Service column and listed the description as “Targeted Digital Advertising Program, 10/14 – 11/3, Estimated Views 1,395,000”, with a \$60,000 balance due. The bottom of the invoice contained a handwritten note from the Campaign stating “Pd BT 10/5/20.”
- The documentation also included: (1) a copy of a Campaign QuickBooks receipt from WPSI indicating that a \$40,000 payment had been made by the Campaign on October 5, 2020, for Invoice #1747, that a \$20,000 remaining balance was outstanding, and listing the Status as “Partially paid”; and (2) a copy of a Campaign QuickBooks receipt from WPSI indicating that a \$20,000 payment had been made by the Campaign on October 5, 2020, for Invoice #1747, and that the total invoice amount had been for \$60,000.

Two \$45,000 expenditures made October 1 and 2, 2020 for Comcast Cable Buy

- The documentation included a copy of WPSI Invoice #1722 made out to Tanisha Harris with a September 29, 2020 date, an October 2, 2020 due date, and the Terms listed as “Due on receipt”.

- The invoice stated “#40110 Consulting Tasks” under the Service column, and listed the description as “Cable Television Ads, Sub-Vendor Comcast, 10/12 – 11/3, Estimated Impressions 1,072, 831”, with a \$90,000 balance due. The bottom of the invoice contained a handwritten note from the Campaign stating “Pd BT 9/30/20 \$45,000; Cashier Check 10/2/20 \$45,000.” The documentation also included a copy of a Campaign QuickBooks receipt from WPSI indicating that a \$45,000 payment had been made by the Campaign on October 1, 2020, for Invoice #1722, that a \$45,000 remaining balance was outstanding, and listing the Status as “Partially paid.”

\$14,511.20 expenditure made on October 22, 2020 for a Mailer

- The documentation included a copy of WPSI Invoice #1756 made out to Tanisha Harris with an October 7, 2020 date, an October 16, 2020 due date, and the Payment Terms listed as “10 days”. The invoice stated “#40110 Consulting Tasks” under the Service column and listed the description as “Mail Piece #1, Quantity 36,278, Sub-Vendor Capitol City Press (\$9,577.20 Printing, \$2,615 Mail House Services, \$1,219 sales tax)” for a total \$13,411.20.
- In addition, the invoice state under Services “40400 Design” listing “Design for Ad, Sub-Vendor Bluewave” for a total of \$500, and #40110 Consulting Tasks listing “Strategy, District Analysis, Copywriting and Vendor Management” by WPSI totaling \$600. The documentation also included a copy of a Campaign QuickBooks receipt from WPSI indicating that a \$14,511.20 payment had been made by the Campaign on October 22, 2020, for Invoice #1756, that a \$45,000 remaining balance was outstanding, and listing the Status as “Partially paid.”

\$6,000 expenditure on July 15, 2020, for “Digital Ads”

- The documentation included copies of: (1) WPSI Invoice #1573 made out to Tanisha Harris with a July 8, 2020 invoice and due date, and the Payment Terms listed as “Due on receipt”. The invoice stated “#60250 Media Buys” under the Service column and listed the description as “Programmatic Digital Ads for Primary Election, est. 331,200 impressions, 7/14 – 8/3/2020” and totaling \$6,000; and (2) A Campaign QuickBooks receipt from WPSI indicating that a \$6,000 payment had been made by the Campaign on July 15, 2020, for Invoice #1573, for a total of \$6,000.

**Expenditures to Capitol City Press**

3,632.09 expenditure was made on July 24, 2020 for “Mailer Postage”

- The documentation included copies of: (1) Capitol City Press Invoice #104993 stating at the top right “**Invoice for Postage**”, followed by “Attn John” with WPSI and the Job Name: “Harris #2” with a July 24, 2020 Invoice Date. The invoice stated Postage Due In: 7/27/2020; Postage Affixed: CCP Company with a July 28, 2020 mail drop date totaling \$3,632.09 for postage, and listing the “Expected Quantity” as 17,287 mail pieces; and (2) Campaign check #188 was dated July 24, 2020, made out to Capitol City Press totaling \$3,632.09, stated in the Memo field that it was for Invoice #104993, and signed by Ms. Manning.

\$8,182.41 expenditure made on October 10, 2020 for “Mailer Postage”

- The documentation included a copy of a Capitol City Press Invoice #105670 that stated at the top right **“Invoice for Postage”**, followed by “Attn John” with WPSI and the Job Name: “Tanisha Harris #2.” The invoice had an October 7, 2020 Invoice Date and stated Postage Due (10/12/2020); Postage Affixed: CCP Company with an October 13, 2020 mail drop date totaling \$8,182.41 for postage. The invoice listed the “Expected Quantity” as 34,449 mail pieces, and included a handwritten note stating “Pd ck #200 10/10/20 \$8,182.41 email – Ch. copy attached.”
- The documentation also included a copy of Campaign check #188 which was dated July 24, 2020, made out to Capitol City Press totaling \$3,632.09, signed by Ms. Manning, and stating in the Memo field that it was for Invoice #104993.

### **Expenditures to Rewired LLC**

Rewired LLC provided the Campaign peer-to-peer text messaging to communicate with voters during the 2020 election cycle.

- The documentation provided included copies of: (1) Rewired LLC Receipt # 2716-5944 for Invoice #DE1F767C-0001, indicating the Campaign made a \$259.54 expenditure on August 6, 2020 using a Visa Credit Card for 9,937 Outbound MMS segments, and a total number of 13,374 validations; (2) Rewired LLC Receipt # 2094-6812 for Invoice #DE1F767C-0002, indicating the Campaign made a \$106.53 expenditure on September 12, 2020 using a Visa Credit Card for 4,829 Outbound MMS segments; and (3) Rewired LLC Receipt # 2758-5062 for Invoice #DE1F767C-0003, indicating the Campaign made a \$665.83 expenditure on November 9, 2020 using a Visa Credit Card for 28,944 Outbound MMS segments.

### **Expenditures to City of Vancouver**

The Campaign purchased advertising space in the Senior Messenger, a regularly scheduled publication produced and distributed by the City of Vancouver.

- The documentation provided included copies of: (1) A City of Vancouver Invoice #00011571, with a July 1, 2020 Invoice date, a July 31, 2020 Due date, and the Payment Terms stated “Net 30” for Customer Number 93574. The invoice totaled \$350, with the description listed as “1 Senior Messenger Advertisement” and included a handwritten note indicating that Check #189 was paid on 7/30/2020; and (2) A City of Vancouver Invoice # 00013486, with an October 1, 2020 Invoice date, an October 31, 2020 Due date, and the Payment Terms stated “Net 30” for Customer Number 93574. The invoice totaled \$350, with the description listed as “1 Senior Messenger Advertisement” and included a handwritten note indicating that Check #199 was paid on 10/10/2020.
- The documentation also included a copy of a City of Vancouver Collection Letter sent to the Tanisha Harris Campaign for Customer Number 93574, with a December 3, 2019 Statement Date and listing the amount due as \$308. The Invoice Date was October 1, 2018, with an October 31, 2018 Due Date, for Invoice #454378 and included the following handwritten note “2018 Elections, we disputed the charge but paid for so we would not be locked out of the Messenger. Pd Ch#179 5/1/20.”

- As part of the audit, PDC staff requested each Campaign provide information concerning general campaign practices such as internal compliance controls, procedures for processing, depositing, recording and disclosure of contribution, procedures for making and reporting expenditures, including for debts, obligations, and orders placed, in-kind contributions, and candidate loans.
- The May 6, 2021 email received from Ms. Manning included an attached letter to PDC staff providing the requested information concerning campaign practices, internal compliance controls, procedures for processing and reporting contribution and expenditure activities.

### 2020 Contribution Process

- Ms. Manning stated that the monetary contributions received by the 2020 Campaign were through checks mailed to the Campaign PO Box or received through an online credit card service. She stated that an occasional contribution check or remittance envelope containing a contribution was given directly to the candidate or to the campaign manager and added the Campaign procedure was that only she deposited contributions into the Campaign bank account.
- Ms. Manning stated that she checked the post office box at least once or twice a week to process the contribution checks or remittance envelopes that had been received by the Campaign. She stated that within one to two days of receiving the contribution checks, she would “makes copies of all checks along with copies of the remits for the campaign books so that all donor information will be retained.” She stated that the copies of the contribution checks and remittance envelopes formed a “deposit packet” which she used to verify the amount of contributions being deposited.
- Ms. Manning noted the deposit date and amount being deposited on each packet along with a copy of the deposit receipt, which was also attached as part of the packet. She stated that once the “deposit packet” was completed it was set aside until it was time to file the corresponding C-3 report.
- Ms. Manning stated that concerning the receipt of online or credit card contributions, the Campaign used Anedot as the vendor to process all online/credit card contributions received through the Campaign website. She stated that the weekly contributor information data was downloaded into a spreadsheet, organized into deposits, and verified by accessing the online bank statements. She stated the “deposit packets” were created and maintained as part of the campaign books of account and were clearly marked with the date and total amount of monetary contributions being deposited.
- Ms. Manning stated the Campaign C-3 reports were filed weekly every Monday beginning June 1, 2020, and that she typically prepared the C-3 reports on Sunday to meet the Monday C-3 filing deadline. She would match the “deposit packets” to the bank information concerning the dates and amounts for accuracy, and then she would create and file the C-3 reports. In addition, she maintained copies of the C-3 reports with each of the “deposit packets.” She also tracked all income and expense data in a spreadsheet that she used to not only balance the Campaign the bank account, but to verify that the C-3 reports being filed were accurate.

### 2020 Expenditure Process

- Ms. Manning stated that expenditures made by the 2020 Campaign were determined or made by Ms. Harris, and the candidate in consultation with the Campaign Manager. She stated that for the Campaign media buys, Ms. Harris in consultation with Winpower Strategies made those expenditure decisions. She stated that all political advertising expenditures were part of the Campaign Plan and were noted as such in the expenditure descriptions on the C-4 report as having been for digital, broadcast, or print political advertisements.
- Ms. Manning stated that in the early stages, the Campaign disclosed debts and orders placed as being owed on the C-4 reports, and as “the campaign progressed, purchases were added as funds became available or determined necessary to compete (but were not part of the original plan).” She stated that digital and broadcast political advertisements were “placed by the consultant after artistic and financial approval by the candidate. Invoices were emailed to the treasurer for payment and reporting. Newspaper advertising was placed by the campaign manager as budgeted after artistic and financial approval from the candidate (The Messenger and the Labor Press).”

### 2018 Campaign Report Filings, Records and Books of Account

- Ms. Manning stated that C-3 reports were filed weekly by the Campaign as noted above, and the C-4 reports were filed monthly except for the 21-Day and 7-Day Pre-Election C-4 reports and Post-Election C-4 reports. She stated that throughout any given period, “any receipts received (either electronically or hard copy) were printed for the campaign books, tracked on the spreadsheet, and held for the monthly report. All receipts were matched to the bank account for accuracy and verification before filling out the C-4 report.”
- Ms. Manning stated the Campaign overhead and operations costs and “expenditures were often discussed by phone or text with the campaign manager” and that the larger Campaign “expenditures were discussed in planning meetings (online in 2020) as budget discussions.” She stated that she tracked all Campaign expenditures in order to properly budget resources, and so the candidate would be aware of her campaign finances at all times. She stated that Ms. Harris and the Campaign received automated emails from Anedot as the online contributions were received on a weekly basis. In addition, the master campaign spreadsheet she maintained listed all contributions received by the Campaign, either online or by check, and expenditures made which was shared with the candidate for review. She stated that Ms. Harris reviewed the C-3 and C-4 reports once they had been filed.
- Ms. Manning stated that the campaign books of account for the 2020 Tanisha Harris Campaign were kept in “hard copy” form in notebooks by her, and those records will be maintained by the Campaign for the required five years. She that in addition to the notebooks, the Campaign maintained a spreadsheet (stored in a Dropbox cloud storage for security) that included “a bank accounting tab, a complete donor list, budget as proposed and actuals, and other tracking information that would be helpful to the candidate.” In addition, Ms. Manning provided a copy of the 2020 Master Campaign spreadsheet that she shared with PDC staff to show her accounting process and documentation of the 2020 contribution and expenditure activities.

- Ms. Manning stated that she “continues to be responsible for the campaign records” after the election. She stated that during the 2020 Campaign, all required contact information by the Campaign for the public inspection period was disclosed, but no one requested to inspect the campaign books of account. She stated that had a request to inspect the records been received, “the campaign notebooks containing all income and expenditure copies would have been made available.”
- Ms. Manning stated that there were some reimbursements made for campaign related expenditures or activities during the 2020 election, as noted on the C-4 reports. She stated that all of the expenditures made during 2020 Campaign by the candidate had been disclosed as in-kind contribution/loans and “reimbursed in November since funds were available after all other expenses were covered.” She added that since the in-kind contribution/loans were reported as they were made, the “receipts were kept with the monthly reports in the campaign notebooks.”
- Ms. Manning stated there “were a few reimbursements to campaign workers that were reimbursed by check as they occurred. Receipts were required for reimbursement and are maintained in the campaign notebooks.”

#### IV.

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

- C-1 reports, C-3 reports, and C-4 reports filed by the 2020 Tanisha Harris for State Representative Campaign covering the period of February 2 through December 31, 2020.
- Email exchanges between PDC staff, and Marsha Manning, Campaign Treasurer on behalf of the 2020 Tanisha Harris for State Representative Campaign.
- PDC staff queried the PDC Contribution and Expenditure database for the 2020 Tanisha Harris for State Representative Campaign contribution and expenditure information covering the period of February 2 through December 31, 2020.

#### V.

#### Statutes and Rules

- **RCW 42.17A.235 and 240** require continuing political committees under the Full Reporting Option to file timely, accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the committee. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. Beginning June 1<sup>st</sup> for every political committees participating in an election, C-4 reports are required 21 and 7 days before each election in which the committee receives contributions or makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same time and are required to be disclosed on a C-3 report filed every Monday for monetary contributions deposited into the committee bank account the previous five business days.
- **RCW 42.17A.220** requires political committee to deposit monetary contributions received shall be deposited by political committee members, paid staff, or treasurers in a depository in an account established and designated for that purpose. Such deposits shall be made within five business days of receipt of the contribution.

Respectfully submitted this 30th day of June 2021.

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Electronically Signed Kurt Young  
PDC Compliance Officer

### **Audit Exhibits**

- Audit Exhibit #1** Documents provided on May 6, 2021, by the 2020 Tanisha Harris Campaign in response to the audit letter.
- Audit Exhibit #2** Memorandum/letter provided on May 6, 2021, by 2020 the Tanisha Harris Campaign concerning campaign practices, procedures, and internal controls.





Payment receipt

You paid \$6,000.00

to Winpower Strategies Inc on 7/15/2020

Invoice no.	1573
Invoice amount	\$6,000.00
Total	\$6,000.00

Payment method \*\*\*\*\*9286

Transaction ID AOD8AG7H



Winpower Strategies Inc

1 2067951950

<https://www.winpowerstrategies.com/> |  
[accounting@winpowerstrategies.com](mailto:accounting@winpowerstrategies.com)

19550 International Boulevard Suite 103,  
SeaTac, WA 98188



Payment receipt

You paid \$20,000.00

to Winpower Strategies Inc on October 5, 2020

Invoice no.	1747
Invoice amount	\$60,000.00
Total	\$20,000.00

Payment method \*\*\*\*\*9286  
 Authorization ID AOM3G2SF



Winpower Strategies Inc

1 2067951950

<https://www.winpowerstrategies.com/> |  
[accounting@winpowerstrategies.com](mailto:accounting@winpowerstrategies.com)

19550 International Boulevard Suite 103,  
SeaTac, WA 98188



Payment receipt

**You paid \$45,000.00**

to Winpower Strategies Inc on October 1, 2020

Invoice no. 1722

Invoice amount \$90,000.00

Total \$45,000.00

Outstanding balance \$45,000.00

Status Partially paid

Payment method \*\*\*\*\*9286

Authorization ID AOLG46F9



**Winpower Strategies Inc**  
 19550 International Boulevard Suite 103  
 SeaTac, WA 98188 US  
 accounting@winpowerstrategies.com  
 https://www.winpowerstrategies.com/



**INVOICE**

**BILL TO**  
 Tanisha Harris  
 Tanisha Harris  
 PO Box 873235  
 Vancouver 98687

**INVOICE #** 1722  
**DATE** 09/29/2020  
**DUE DATE** 10/02/2020  
**TERMS** Due on receipt

SERVICE	DESCRIPTION	AMOUNT
40110 Consulting Tasks	Cable Television Ads, Sub-Vendor Comcast, 10/12 - 11/3, Estimated Impressions 1,072,831	90,000.00
<b>BALANCE DUE</b>		<b>\$90,000.00</b>

*Pl*  
*BT 9/30/20 \$45,000<sup>00</sup>*  
*Assessment 10/2/20 \$45,000<sup>00</sup>*

**Winpower Strategies Inc**  
 19550 International Boulevard Suite 103  
 SeaTac, WA 98188 US  
 accounting@winpowerstrategies.com  
 https://www.winpowerstrategies.com/



**INVOICE**

**BILL TO**  
 Tanisha Harris  
 Tanisha Harris  
 PO Box 873235  
 Vancouver 98687

**INVOICE #** 1747  
**DATE** 10/05/2020  
**DUE DATE** 10/05/2020  
**TERMS** Due on receipt

You paid \$20,000.00

to Winpower Strategies Inc on October 5, 2020

SERVICE	DESCRIPTION	AMOUNT
40110 Consulting Tasks	Targeted Digital Advertising Program, 10/14-11/3, Estimated Views 1,395,000	60,000.00
	Invoice amount	\$60,000.00

Payment must be received by 10/9. Please send cashier's check (preferred) via FedEx or Express Mail to our office.

**BALANCE DUE** \$20,000 **\$60,000.00**

Payment method: 9286

Authorization ID: ADM3G25F

*Pal*  
*BT 10/5/20*

**Winpower**  
 Winpower Strategies Inc  
 1-206-795-1950  
 https://www.winpowerstrategies.com/ |  
 accounting@winpowerstrategies.com  
 19550 International Boulevard Suite 103  
 SeaTac, WA 98188





**Capitol City Press**

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

**Invoice for Postage**

**Attn** JOHN  
WINPOWER STRATEGIES  
19550 INTERNATIONAL BLVD STE 103  
SEATAC WA 98188

**Job Name:** Harris Brochure  
**Invoice #** 104741 **CustCode:** 7837  
**Invoice Date:** 7/10/2020  
**PO#:**

**Invoice Details**

**Job Number:** 104741  
**Project:** Harris Brochure  
**Postage Due In:** 7/13/2020  
**Postage Affixed:** CCP Company  
**Drop Date:** 7/14/2020  
**Postage Amount:** \$3,632.34  
**Expected Qty.:** 17,287

**Special Instructions:**

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

*Jr#185  
7/12/20*

**Winpower Strategies Inc**  
 19550 International Boulevard Suite 103  
 SeaTac, WA 98188 US  
 accounting@winpowerstrategies.com  
 https://www.winpowersstrategies.com/



**INVOICE**

**BILL TO**

Tanisha Harris  
 Tanisha Harris  
 PO Box 873235  
 Vancouver 98687

**INVOICE #** 1756

**DATE** 10/07/2020

**DUE DATE** 10/16/2020

**TERMS** 10 days

SERVICE	DESCRIPTION	AMOUNT
<b>40110 Consulting Tasks</b>	Mail Piece #1, Quantity 36,278, Sub-Vendor Capitol City Press (\$9577.20 Printing, \$2615 Mail House Services, \$1219 sales tax)	13,411.20
<b>40400 Design</b>	Design for Ad, Sub-Vendor Bluewave	500.00
<b>40110 Consulting Tasks</b>	Strategy, District Analysis, Copywriting and Vendor Management by Winpower Strategies	600.00
<b>BALANCE DUE</b>		<b>\$14,511.20</b>



Payment receipt

You paid \$14,511.20

to Winpower Strategies Inc on October 22, 2020

Invoice no.	1756
Invoice amount	\$14,511.20
Total	\$14,511.20

Payment method \*\*\*\*\*9286  
 Authorization ID AONT3B5Z



Winpower Strategies Inc

1 2067951950

<https://www.winpowerstrategies.com/> |  
[accounting@winpowerstrategies.com](mailto:accounting@winpowerstrategies.com)

19550 International Boulevard Suite 103,  
SeaTac, WA 98188





Payment receipt

You paid \$40,000.00

to Winpower Strategies Inc on October 5, 2020

Invoice no. 1747

Invoice amount \$60,000.00

Total \$40,000.00

Outstanding balance \$20,000.00

Status Partially paid

Payment method \*\*\*\*\*9286

Authorization ID AOM3ECCD



**Capitol City Press**

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

**Invoice for Postage**

**Attn JOHN**  
WINPOWER STRATEGIES  
19550 INTERNATIONAL BLVD STE 103  
SEATAC WA 98188

**Job Name:** Harris #2  
**Invoice #** 104993 **CustCode:** 7837  
**Invoice Date:** 7/24/2020  
**PO#:**

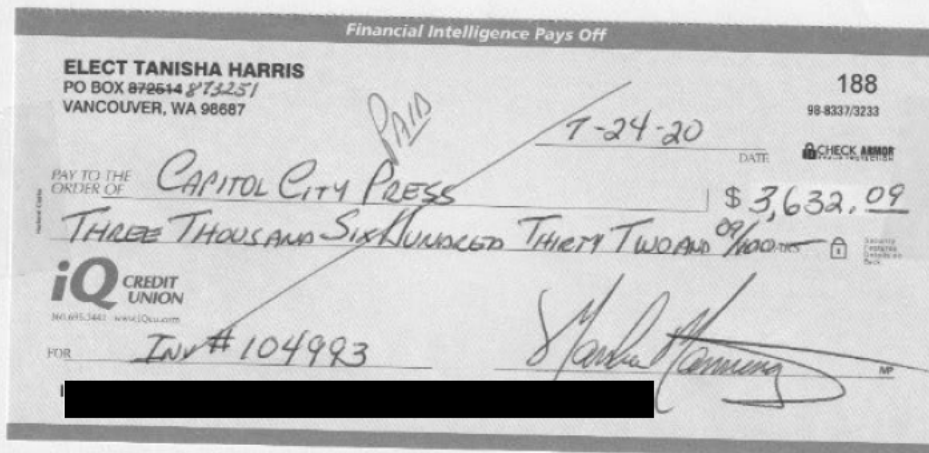
**Invoice Details**

**Job Number:** 104993  
**Project:** Harris #2  
**Postage Due In:** 7/27/2020  
**Postage Affixed:** CCP Company  
**Drop Date:** 7/28/2020  
**Postage Amount:** \$3,632.09  
**Expected Qty.:** 17,287

*Paid by  
Scanner & emailed  
7/24/20*

**Special Instructions:**

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



# Rewired LLC

PO BOX 110971  
Brooklyn NY 11221  
United States  
+1 646-389-3770  
support@politicsrewired.com

# Receipt

Receipt number 2716-5944  
Invoice number DE1F767C-0001  
Date paid August 6, 2020  
Payment method **VISA** - 4810

**Paid by**  
Elect Tanisha Harris  
PO Box 973251  
Vancouver, 98687  
United States  
info@electtanisha.com

## \$259.54 paid on August 6, 2020

Elect Tanisha Harris Spoke usage for July 2020.

Rewired is 100% remote and accepts electronic payment via credit card, debit card, or ACH transfer. If you are unable to pay electronically please get in touch to arrange an alternative payment method.

Description	Qty	Unit price	Amount
Number validation	13,374	\$0.0025	\$33.44
Inbound SMS segments	1,455	\$0.01	\$14.55
Outbound MMS segments	9,937	\$0.02	\$198.74
Outbound SMS segments	1,261	\$0.01	\$12.61
Inbound MMS segments	10	\$0.02	\$0.20
<b>Subtotal</b>			<b>\$259.54</b>
<b>Amount paid</b>			<b>\$259.54</b>

Rewired is 100% remote and accepts electronic payment via credit card, debit card, or ACH transfer. If you are unable

Questions? Contact Rewired LLC at support@politicsrewired.com or call at +1 646-389-3770.

# Rewired LLC

PO BOX 110971  
Brooklyn NY 11221  
United States  
+1 646-389-3770  
support@politicsrewired.com

# Receipt

Receipt number 2094-6812  
Invoice number DE1F767C-0002  
Date paid September 12, 2020  
Payment method **VISA - 4810**

**Paid by**  
Elect Tanisha Harris  
PO Box 973251  
Vancouver, 98687  
United States  
info@electtanisha.com

## \$106.53 paid on September 12, 2020

Elect Tanisha Harris Spoke usage for August 2020.

Rewired is 100% remote and accepts electronic payment via credit card, debit card, or ACH transfer. If you are unable to pay electronically please get in touch to arrange an alternative payment method.

Description	Qty	Unit price	Amount
Number validation	56	\$0.0025	\$0.14
Outbound SMS segments	378	\$0.01	\$3.78
Inbound MMS segments	12	\$0.02	\$0.24
Inbound SMS segments	579	\$0.01	\$5.79
Outbound MMS segments	4,829	\$0.02	\$96.58

Subtotal \$106.53

Amount paid **\$106.53**

*RL Debit  
9/12/20*

Rewired is 100% remote and accepts electronic payment via credit card, debit card, or ACH transfer. If you are unable

Questions? Contact Rewired LLC at support@politicsrewired.com or call at +1 646-389-3770.

2094-6812 - Page 1 of 2





Payment receipt

You paid \$6,000.00

to Winpower Strategies Inc on 7/15/2020

Invoice no.	1573
Invoice amount	\$6,000.00
Total	\$6,000.00

Payment method \*\*\*\*\*9286

Transaction ID AOD8AG7H



Winpower Strategies Inc

1 2067951950

<https://www.winpowerstrategies.com/> |  
[accounting@winpowerstrategies.com](mailto:accounting@winpowerstrategies.com)

19550 International Boulevard Suite 103,  
SeaTac, WA 98188

# Rewired LLC

PO BOX 110971  
Brooklyn NY 11221  
United States  
+1 646-389-3770  
support@politicsrewired.com

# Receipt

Receipt number 2758-5062  
Invoice number DE1F767C-0003  
Date paid November 9, 2020  
Payment method **VISA - 4810**

**Paid by**  
Elect Tanisha Harris  
PO Box 973251  
Vancouver, 98687  
United States  
info@electtanisha.com

## \$665.83 paid on November 9, 2020

Elect Tanisha Harris Spoke usage for October 2020.

Rewired is 100% remote and accepts electronic payment via credit card, debit card, or ACH transfer. If you are unable to pay electronically please get in touch to arrange an alternative payment method.

Description	Qty	Unit price	Amount
Inbound SMS segments	2,367	\$0.01	\$23.67
Number validation	17,581	\$0.0025	\$43.95
Outbound MMS segments	28,944	\$0.02	\$578.88
Outbound SMS segments	1,887	\$0.01	\$18.87
Inbound MMS segments	23	\$0.02	\$0.46

**Subtotal** \$665.83

**Amount paid** \$665.83

Rewired is 100% remote and accepts electronic payment via credit card, debit card, or ACH transfer. If you are unable

Questions? Contact Rewired LLC at support@politicsrewired.com or call at +1 646-389-3770.



For correspondence mail to:  
City of Vancouver  
P.O. Box 8995  
Vancouver, WA 98668-8995

For payment mail to:  
P.O. Box 24987  
Seattle, WA 98124-0987

# INVOICE

**BILL TO:**  
ELECT TANISHA HARRIS  
ATTN: TIFFANY BURNETTE  
PO BOX 873251  
VANCOUVER, WA 98687

Due Date	Invoice Date	Customer Number
7/31/20	7/1/20	93574
Terms	PO Number	Invoice Number
Net 30		00011571

Item #	Description	Qty	Unit Price	Extended Amount
1	Senior Messenger Advertisement. A tear sheet is not included with the invoice this month. Should you require one, please call 360-750-9900 or email ad@seniormessenger.org to request an electronic tear sheet.	1.00	\$350.00	\$350.00

Special Instructions	Subtotal	Invoice Tax	Shipping	TOTAL
	\$350.00	\$0.00		\$350.00

*ch#189  
7/30/20*

1 of 1

A penalty may be assessed if payment is received after the due date.  
Payments accepted at Customer Service: 415 W. 6th Street  
Call 360-487-8454 option 5 to pay by credit card  
Call 360-487-8410 if you have questions regarding this invoice

**Capitol City Press**

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

**Invoice for Postage**

**Attn** JOHN  
WINPOWER STRATEGIES  
19550 INTERNATIONAL BLVD STE 103  
SEATAC WA 98188

**Job Name:** Tanisha Harris #1  
**Invoice #** 105670 **CustCode:** 7837  
**Invoice Date:** 10/7/2020  
**PO#:**

**Invoice Details**

**Job Number:** 105670  
**Project:** Tanisha Harris #1  
**Postage Due In:** 10/12/2020  
**Postage Affixed:** CCP Company  
**Drop Date:** 10/13/2020  
**Postage Amount:** \$8,182.41  
**Expected Qty.:** 34,449

**Special Instructions:**

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

*Pd ch#200 10/10/20  
\$ 8182.41  
EMAIL - Chk COPY ATTACHED*





CITY OF VANCOUVER  
Financial & Management Services  
P.O. Box 8995  
Vancouver, WA 98668-8995  
www.cityofvancouver.us

# COLLECTION LETTER

**BILL TO:**  
ELECT TANISHA HARRIS  
ATTN: SARA DEVELLE  
PO BOX 872514  
VANCOUVER, WA 98687

Statement Date	Customer Number
12/3/19	93574
<b>Amount Due</b>	
\$308.00	

Dear Sir or Madam,

This is a courtesy reminder that the following invoices are past due. Please remit payment to keep your account current. If you have already submitted your payment, please disregard this notice.

Thank you.

Invoice Number	Invoice Date	Due Date	Days Late	Amount Due	Total Invoice Amount
454378	10/1/18	10/31/18		\$308.00	\$308.00

*2018 ELECTIONS*

*WE DISPUTED THE CHARGE  
BUT PAID SO WE WOULD NOT  
BE LOCKED OUT OF THE MESSENGER*

*PR #179  
5/1/20*

1 of 1

**Winpower Strategies Inc**  
 19550 International Boulevard Suite 103  
 SeaTac, WA 98188 US  
 accounting@winpowerstrategies.com  
<https://www.winpowerstrategies.com/>



**INVOICE**

**BILL TO**

Tanisha Harris  
 Tanisha Harris  
 PO Box 873235  
 Vancouver 98687

**INVOICE #** 1573  
**DATE** 07/08/2020  
**DUE DATE** 07/08/2020  
**TERMS** Due on receipt

ACTIVITY	DESCRIPTION	AMOUNT
60250 Media Buys	Programmatic Digital Ads for Primary Election, est. 331,200 impressions, 7/14-8/3/2020	6,000.00
Revised 7/13/2020		
<b>BALANCE DUE</b>		<b>\$6,000.00</b>



For correspondence mail to:  
City of Vancouver  
P.O. Box 8995  
Vancouver, WA 98668-8995

For payment mail to:  
P.O. Box 24987  
Seattle, WA 98124-0987

# INVOICE

**BILL TO:**  
ELECT TANISHA HARRIS  
ATTN: TIFFANY BURNETTE  
PO BOX 873251  
VANCOUVER, WA 98687

Due Date	Invoice Date	Customer Number
10/31/20	10/1/20	93574

Terms	PO Number	Invoice Number
Net 30		00013486

Item #	Description	Qty	Unit Price	Extended Amount
1	Senior Messenger Advertisement. A tear sheet is not included with the invoice this month. Should you require one, please call 360-750-9900 or email ads@seniormessenger.org to request an electronic tear sheet.	1.00	\$350.00	\$350.00

Special Instructions	Subtotal	Invoice Tax	Shipping	TOTAL
	\$350.00	\$0.00		\$350.00

1 of 1

A penalty may be assessed if payment is received after the due date.  
Payments accepted at Customer Service: 415 W. 6th Street  
Call 360-487-8454 option 5 to pay by credit card  
Call 360-487-8410 if you have questions regarding this invoice

Please detach and return this portion with your payment.

**BILL TO:**  
ELECT TANISHA HARRIS  
ATTN: TIFFANY BURNETTE  
PO BOX 873251  
VANCOUVER, WA 98687

**Customer Number:** 93574  
**Due Date:** 10/31/20  
**Invoice Number:** 00013486  
**Invoice Amount:** \$350.00

ch# 199  
10-10-20

For a mailing address change,  
please contact phone number above

**Make Check Payable To:** City of Vancouver

99990000093574000001348600000350001

Kurt Young  
Public Disclosure Commission  
2020 Tanisha Harris for State Representative Campaign Audit

Documentation requests:

1. Winpower Strategies  
\$60,000 on 10/5/20 PDC-WPS Digital-1a.jpeg, PDC-WPS Digital-1b.jpeg, PDC-WPS Digital-1c.jpeg  
\$45,000 on 10/1/20 PDC-WPS Cable-1a.jpeg, PDC-WPS Cable-1b.jpeg  
\$45,000 on 10/2/20 PDC-WPS Cable-1c.jpeg  
\$14,511.20 on 10/22/20 PDC-WPS Mailer-1a.jpeg, PDC-WPS Mailer-1b.jpeg  
\$6,000 on 7/15/20 PDC-WPS PrimaryDigital-1a.jpeg, PDC-WPS PrimaryDigital-1b.jpeg
2. Capitol City Press  
\$8,182.41 on 10/10/20 PDC-CapCity Mailer 10-10.jpeg  
\$3,362.34 on 7/12/20 PDC-CapCity Mailer 7-12.jpeg  
\$3,632.09 on 7/24/20 PDC-CapCity Mailer 7-24.jpeg
3. Rewired LLC  
\$665.83 on 11/9/20 PDC-Rewired Nov.jpeg  
\$259.54 on 8/7/20 PDC-Rewired Aug.jpeg  
\$106.53 on 9/12/20 PDC-Rewired Sept.jpeg
4. City of Vancouver  
\$350 on 10/10/20 PDC-VancMessenger Oct.jpeg  
\$308 on 5/26/20 PDC-VancMessenger May.jpeg  
\$350 on 7/30/20 PDC-VancMesseger Jul.jpeg

Response for Public Disclosure Commission audit of Elect Tanisha Harris 2020 campaign.

1. Contributions come into the campaign in various ways but mostly through the post office or an online credit card service with the occasional check/remit handed directly to the candidate or campaign manager. The process in the Harris campaign was that only the Treasurer, Marsha Manning, makes deposits to the bank.

Process for checks/remits: The post office box was checked once or twice a week. Within one to two days of receiving checks, the treasurer makes copies of all checks along with copies of the remits for the campaign books so that all donor information will be retained. These copies form a "deposit packet" which is verified to match the deposit itself. Deposit date and amount are noted on the packet and the deposit receipt is attached when received. The packet is set aside until time to file PDC reports.

Online/credit card contributions: The Harris campaign used AneDot for online/credit card donations. Weekly the data was downloaded into a spreadsheet, organized into deposits, and verified through online bank access. Deposit packets were created for the campaign books and marked with deposit date and amount. These packets were set aside until time to file PDC reports.

Filing PDC reports was done weekly, usually on Sunday to meet the Monday deadline. Once again, the packets were matched to bank information (date and amount) for accuracy. C3 reports were created and filed. Copies of C3 reports were kept with the deposit packets. All income and expense data was tracked in a spreadsheet for balancing the bank account and verifying that the C3 reports were accurate.

2. Expenditures were determined and made by the Candidate, the Campaign Manager, and in cases of media buys, the Consultant. Advertising purchases were part of the Campaign Plan and noted as digital, broadcast, or print. Where the plan was detailed, debt was shown on PDC reports. As the campaign progressed, purchases were added as funds became available or determined necessary to compete (but were not part of the original plan). Digital and broadcast advertising was placed by the consultant after artistic and financial approval by the candidate. Invoices were emailed to the treasurer for payment and reporting. Newspaper advertising was placed by the campaign manager as budgeted after artistic and financial approval from the candidate (The Messenger and the Labor Press).
3. C3 reports were filed weekly as described in #1 above. C4 reports were filed monthly with some exception to meet PDC deadlines. Throughout the month any receipts received (either electronically or hard copy) were printed for the campaign books, tracked on the spreadsheet, and held for the monthly report. All receipts were matched to the bank account for accuracy and verification before filling out the C4 report. Overhead and operations expenditures were often discussed by phone or text with the campaign manager. Large expenditures were discussed in planning meetings (online in 2020) as budget discussions. The treasurer tracked all expenditures to budget so that the candidate would be aware. The candidate was notified by email from Anedot as online donations occurred. On a weekly basis, the campaign spreadsheet listing all donations (online or by check) and expenditures was shared with the candidate for review. The candidate reviewed the C3 and C4 reports after they were filed.
4. The campaign books for Tanisha Harris are kept in “hard copy” in notebooks by the treasurer and will be maintained for five years. Along with the notebooks, a spreadsheet is maintained (in Dropbox cloud storage for security) that contains a bank accounting tab, a complete donor list, budget as proposed and actuals, and other tracking information that would be helpful to the candidate.
5. The treasurer continues to be responsible for the campaign records. Contact information was provided for public inspection, although no requests were made. The campaign notebooks containing all income and expenditure copies would have been made available.
6. Some reimbursements were made on the 2020 campaign. All expenditures made by the candidate were reported as “In-kind Loans” during the campaign and reimbursed in November since funds were available after all other expenses were covered. Because the “In-kind Loans” were reported as they happened, receipts were kept with the monthly reports in the campaign notebooks. There were a few reimbursements to campaign workers that were reimbursed by check as they occurred. Receipts were required for reimbursement and are maintained in the campaign notebooks.

The campaign spreadsheet is being shared as an attachment to show accounting process and documentation.  
Harris2020 Acct.xlsx

This data is to our knowledge accurate and complete.

Tanisha Harris – Candidate  
Marsha Manning – Treasurer