



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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

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

March 12, 2021

Sent Electronically to Claire Wilson and Jay Petterson, Treasurer

Subject: Audit Report - Claire Wilson 2018 Senate Campaign

Dear Ms. Wilson and Mr. Petterson:

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

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

Thank you for you both for fully cooperating with PDC staff concerning this audit. If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Electronically Signed Erick Agina
PDC Compliance Officer

s/ _____
Electronically Signed Peter Lavallee
PDC Executive Director



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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17A

2018 Claire Wilson for Senate
Campaign

PDC Audit No. 20-04

Audit Report

I.

Audit Scope

- The Public Disclosure Commission (PDC) has the authority under RCW 42.17A.105 and .110 to conduct audits of candidates, committees and other filing entities.
- Initiative 134, a statewide initiative concerning campaign finance and contribution limits was overwhelmingly approved by voters in 1992 and included the requirement for the PDC to conduct audits of filers. The audits are meant to provide the public with the findings of reviews conducted of candidates, political committees and other filers, and to determine those filers' degree of compliance with the reporting requirements and provisions of RCW 42.17A.
- The audit findings provide PDC staff with an opportunity to identify problem areas in reporting campaign or committee contribution and expenditure activities that may suggest a need to revise the PDC's advice and guidance given to filers, to recommend or initiate changes in the law, or to adopt or revise the rules for reporting, and if necessary, 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 selected four State Senate races from the 2018 election cycle, involving eight Legislative candidates, for limited-scope audits to be conducted based on the audit criteria established by staff. The audit criteria included that both 2018 Senate candidates in each Legislative District were in a contested 2018 general election, with both candidates disclosing significant contribution and expenditure activities, and the election generated significant public interest.
- Once the current Senate audits have been completed, PDC staff will be selecting eight candidates for State Representative from the 2020 election cycle to conduct limited-scope audits based on the same audit criteria listed above.

II.

Respondent Background

- Claire Wilson is an incumbent State Senator for the 30th Legislative District since being elected to that office in 2018.
- On February 13, 2018, Claire Wilson filed a Candidate Registration (C-1 report) declaring her candidacy for election to the office of State Senator in the 30th Legislative District in 2018, selecting the Full Reporting Option and listing Jay Petterson as Treasurer.
- In January 2021, the PDC staff sent an email to the Claire Wilson for Senate Campaign, and attached a letter, dated January 25, 2021, notifying her that staff was conducting audits of four 2018 contested Senate races. The letter stated staff was conducting a limited-scope audit of the two 2018 candidates that ran for State Senator in the 30th Legislative District, which included Senator Wilson. The letter requested documentation maintained by the Campaign for selected expenditures made during the 2018 election cycle, in addition to a brief narrative concerning general contribution and expenditure campaign practices, including the record keeping of the campaign books of account in order to complete the audit work.
- As noted above, the audits provide the PDC and the public with an opportunity to determine the degree of compliance with the PDC reporting requirements, thereby enhancing and strengthening the public's confidence in the campaign finance information being disclosed by filers. The audits also assist in identifying areas in the reporting of campaign contribution and expenditure activities that may suggest a need to update or revise the advice on the PDC website in the PDC online candidate manuals, and from Filer Assistance staff, and areas of potential changes in the law or amendments 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 Campaign's timeliness and accuracy in disclosing contribution and expenditure activities undertaken on the C-3 and C-4 reports in accordance with the reporting requirements found in RCW 42.1A.235 and .240.

III. **Audit Findings**

- The 2018 Claire Wilson for Senate Campaign (Campaign) disclosed receiving \$498,420.85 in total contributions received and \$492,638.82 in total expenditures made during the 2018 election cycle, with \$5,782.03 (before paying the \$21.38 loan) as cash on hand balance through December 31, 2018 on the “Final C-4 report” timely filed on January 10, 2019.

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

- Candidates appearing on the 2018 primary and general election ballots who selected the Full Reporting option were required to file weekly C-3 reports every Monday beginning June 1, 2018 through the date of the general election, disclosing contributions that were received and deposited the previous seven days. Prior to June 1, 2018, candidates were required to file monthly C-3 reports for deposits of campaign contributions made during the month or period covered by the C-4 report.
- RCW 42.17A.220 requires candidates to timely deposit monetary contributions received into the campaign bank account or depository within five business days of receipt.
- For the 2018 election cycle, the Campaign filed C-3 reports disclosing contributions received covering the period January 15 through December 31, 2018, that included 1,730 separate monetary and in-kind contributions totaling \$498,420.85. The \$498,420.85 in total monetary and in-kind contributions received included anonymous and small non-itemized contributions as disclosed on C-3 reports.
- The Campaign’s three largest contributors in 2018 included the following political party committees and caucus political committees:
 1. House Democratic Campaign Committee (HDCC): \$72,000 was received from the HDCC on October 1, 2018. This contribution was reported by the Campaign on the October 7, 2018 C-3 report.
 2. Washington Senate Democratic Campaign (WSDC): A total of \$61,200 was received from the WSDC in the 2018 election. \$40,000 was a monetary contribution while \$21,200 was for in-kind contribution(s) received.
 3. The 30th District Democratic Campaign: A total of \$16,500 in monetary contribution was received from the 30th District Democratic Campaign on October 15, 2018. This contribution was timely reported by the Campaign on October 18, 2018.
- The Campaign disclosed receiving anonymous contributions totaling \$362 in the 2018 election cycle.
- Based on the number of C-3 reports filed by the Campaign, staff reviewed random C-3 reports filed for contributions received and deposited beginning June 1, 2018, when the C-3 report accelerated reporting requirements began for 2018 candidates. Under that reporting requirement, C-3 reports are required to be filed every Monday for contributions received and

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

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
6/1/18 – 6/7/18	6/7/2018	Two-page C-3 report depicting 12 contributions rec'd from individuals, six for \$50; two for \$20 and \$30 each, one for \$250; one for \$1,000 and two from small donations of \$25 or less totaling \$25.	\$1,625.00	6/9/2018	0
6/21/18 – 6/26/18	6/27/2018	Five total contributions from three individuals for \$2,500; one small contribution for \$25; and one contribution from a PAC (UFCW 21) for \$1,000.	\$3,525.00	7/1/2018	0
6/30/18 – 7/4/18	7/6/2018	Four-page C-3 report depicting 37 itemized contributions of \$25 to \$1,000 from individuals and 11 small contributions totaling \$195.	\$8,793.00	7/9/2018	0
7/3/18 – 7/6/18	7/9/2018	Three contributions from individuals for \$550 and one contribution for \$40,000 from the Washington Senate Democratic Campaign.	\$40,550.00	7/9/2018	0
7/12/18 – 7/14/18	7/16/2018	Four-page C-3 report depicting 30 itemized contributions of \$5 to \$500 from individuals and 4 small contributions totaling \$40.	\$2,790.00	7/16/2018	0
7/23/18 – 7/27/18	7/27/2018	Three-page C-3 report depicting 24 itemized contributions of \$50 to \$250 and four small contributions totaling \$40.	\$2,460.00	7/30/2018	0
7/30/2018	7/30/2018	Two contributions from individuals for \$228; four small contributions for \$80 and three contributions from PACs (Washington Values PAC (2) and Planned Parenthood Votes) for \$2,400.	\$2,708.00	7/31/2018	0
8/12/18 – 8/17/18	8/17/2018	Two-page C-3 report depicting 13 itemized contributions from individuals for \$26 to \$1,000, including seven small contributions totaling \$145.	\$3,311.00	8/20/2018	0
8/27/18 – 8/31/18	8/31/2018	Three-page C-3 report depicting 29 individual contributions of \$25 to \$1,000, including 18 small contributions totaling \$270.	\$4,675.00	9/04/2018	0

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9/15/18 - 9/21/18	9/21/2018	Three-page C-3 report depicting 27 contributions from individuals ranging from \$20 to \$1,000, including four small contributions totaling \$70.	\$6,455.00	9/22/2018	0
9/21 - 9/27 2018	9/27/2018	Three-page C-3 report depicting 17 contributions from individuals ranging from \$45.45 to \$136, including 79 small contributions totaling \$489.88.	\$1,756.25	9/30/2018	0
10/01/18-10/5/18	10/5/2018	Two-page C-3 report depicting five contributions from individuals ranging from \$50 to \$1,000; five contributions from PACs ranging from \$250 to \$72,000; and 2 small contributions totaling \$35.	\$74,810.00	10/7/2018	0
10/7/18 – 10/12/18	10/12/2018	Four-page C-3 report depicting contributions from 31 individuals ranging from \$10 to \$1,000 and five small contributions totaling \$100.	\$4,943.00	10/15/2018	0
10/16/2018	10/16/2018	Three contributions from individuals ranging from \$100 to \$1,000 and three small contributions totaling \$45.	\$1,345.00	10/18/2018	0
10/18/2018	10/17/2018	Two-page C-3 report depicting contributions received from six individuals ranging from \$40 to \$1,000 (\$2,690 total); contributions from three PACs (NARAL Pro-Choice, Children’s Campaign Fund and the 30 th District Democrats) totaling \$17,350 and one small contribution totaling \$25.	\$20,065.00	10/18/2018	0
10/20/18 – 10/24/18	10/26/2018	Two-page C-3 report depicting nine contributions from individuals; six contributions from PACs (Brotherhood of Locomotive, Moveon.org, Stand for Children Washington, Sustainable Future, Tulalip Tribes of Washington and Washington School Principals); one anonymous contribution of \$24; and one small contribution of \$25.	\$4,399.00	10/26/2018	0

10/26/18-10/31/18	11/01/2018	Two-page C-3 report depicting three contributions from individuals; one from a candidate's campaign committee (\$1,000); and three PACs (Puget Sound Leadership (\$500), Puget Sound Pilots PAC (\$1,000) and Aurora Borealis PAC (\$800)).	\$4,000.00	11/02/2018	0
10/27/18 – 10/29/18	10/29/2018	Three-page C-3 report depicting 17 contributions from individuals ranging from \$5 to \$200 and seven small contributions totaling \$84.	\$1,189.00	10/30/2018	0
10/30/18	10/30/2018	Three-page C-3 report depicting 17 contribution from individuals ranging from \$25 to \$1,000.	\$3,261.00	10/31/2018	0
10/30/18 – 11/02/18	11/02/2018	Two contributions totaling \$1,000 from the LGBTQ Victory Fund Federal PAC.	\$1,000.00	11/5/2018	0
11/31/18 – 11/02/18	11/02/2018	Three-page C-3 report depicting contributions from 26 individuals ranging from \$25 to \$500 and six small contributions totaling \$90.	\$2,550.00	11/05/2018	0
11/3/18-11/6/18	11/6/2018	Two-page C-3 report depicting contributions from 13 individuals ranging from \$10 to \$500 and four small contributions totaling \$90.	\$1,255.00	12/10/2018	0
11/6/18	11/6/2018	Six contributions from individuals ranging from \$50 - \$666.	\$1,275.00	12/10/2018	0
Totals			\$198,740.25		

- PDC staff reviewed the 23 C-3 reports filed by the Campaign and listed in the chart above totaling \$198,740.25 which represented about 40 percent of the \$498,420.85 in total contributions received during the 2018 election cycle. As noted in the table above, the Campaign timely filed all 23 C-3 reports reviewed by staff as part of this audit.
- In addition, staff's review verified that the Campaign timely deposited the contributions received within five business days of receipt in accordance with RCW 42.17A.220 for the C-3 reports depicted in the above table.
- PDC staff downloaded the 2018 contribution database for the Campaign as a CSV file into an Excel spreadsheet, formatted and sorted the spreadsheet, and then conducted a review of the 2018 contributor information disclosed on C-3 reports. As part of that review, staff confirmed the Campaign complied with the 2018 election contribution limits which were \$1,000 for the primary and general elections for any individual, political committee, business, labor union, association, other entities and persons.

- Staff’s review also indicated the Campaign disclosed the required Employer and Occupation information for 432 individuals who contributed more than \$100 to the Campaign, totaling \$141,100 in contributions received.
- Of the 432 individuals who disclosed their Employer and Occupation information, 113 listed their Occupation as being “Retired.” Those 113 retirees contributed a total of \$42,782.52 to the 2018 Campaign.
- The PDC audit procedures include staff identifying contributors that made monetary contributions to the Campaign and then verifying or confirming information disclosed concerning those specific contributions. For this audit, staff verified or confirmed selected contributions received by the Campaign by reviewing the expenditure reports of continuing political action committees (PAC) that were registered and required to file C-3 and C-4 reports with the PDC in the 2018 election year, and made contributions to the Campaign in 2018.
- Staff reviewed the contribution spreadsheet and selected 10 PAC contributors that made monetary contributions totaling at least \$1,000 to the Campaign during the 2018 election, and also reviewed the corresponding C-3 reports filed by the Campaign disclosing each PAC’s contribution. The review included listing the date the contributions were received, the date the contributions were deposited, and the date the C-3 reports were filed.
- Staff then reviewed the C-4 reports filed by the selected contributing PAC listed in the chart below for the corresponding contribution expenditure information disclosed on the Schedule A to C-4 report. The contribution information from the Campaign C-3 reports and the contribution expenditure information from the PAC C-4 reports were entered into the chart below and included the following:

Date Received - Campaign	Contributor name	Amount	C-3 Report Filed	Date Made By Donor	Disclosed by Donor
7/6/2018	WA Senate Democratic Campaign	\$40,000	7/17/2018	7/6/2018	C-4 report
7/30/2018	Washington Values PAC	\$1,000	7/31/2018	7/25/2018	C-4 report
10/24/2018	Stand for Children Washington PAC	\$1,000	10/30/2018	10/18/2018	C-4 report
7/23/2018	WA Conservation Voters Action Fund	\$1,000	7/17/18	7/12/2018	C-4 report
8/7/2018	Sustainable Future PAC	\$1,000	9/10/2018	8/7/2018	C-4 report
6/8/2018	UFCW 21 PAC	\$1,000	7/17/2018	6/8/2018	C-4 report
10/22/2018	Civic Action PAC	\$1,000	10/29/2018	10/19/2018	C-4 report
10/24/2018	Stand for Children WA PAC	\$1,000	10/30/2018	10/18/2018	C-4 report
10/26/2018	Puget Sound Pilots PAC	\$1,000	10/30/2018	10/24/2018	C-4 report
11/28/2018	SEIU Healthcare 1199 NW PAC	\$1,000	12/10/2018	11/28/2018	C-4 report

- The review indicated that the Campaign received and deposited all ten of the contributions selected for review within five business days of receipt as required by statute. As noted in the table above, the Campaign disclosed the contributors’ names for the 10 monetary contributions from the PACs listed above within seven to 30 days after each PAC disclosed making the contributions.

- Staff based that information solely on the dates the expenditure for the contribution was disclosed as having been made by the PAC on the corresponding C-4 report, and the date the contribution was disclosed as having been received on the C-3 report filed by the Campaign.

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

- Candidates under the Full Reporting option in 2018 were required to file monthly C-4 reports by the 10th of each month disclosing contribution and expenditure activities incurred in the previous calendar month, and candidates appearing on the 2018 primary and general election ballots were required to file the following C-4 reports:
 1. A 21-day Pre-Primary election C-4 report was due on July 17, 2018, covering the period June 1 through July 16, 2018.
 2. A 7-day Pre-Primary election C-4 report was due on July 31, 2018, covering the period July 17 through July 30, 2018.
 3. A Post-Primary election C-4 report was due by September 10, 2018, covering the period August 1 through August 31, 2018.
 4. A 21-day Pre-General election C-4 report was due on October 16, 2018, covering the period September 1 through October 15, 2018.
 5. A 7-day pre-General election C-4 report was due on October 30, 2018, covering the period October 16 through October 29, 2018.
 6. A Post-General election C-4 report was due by December 10, 2018, covering the period October 30 through November 30, 2018.
- During 2018, the Campaign timely filed C-3 and C-4 reports throughout the year including the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports as detailed in the chart below:

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
February 2018 C-4 report	3/12/2018	2/20/2018	\$21.38	\$21.38	\$21.38 for web domain: Go Daddy.	0
February 2018 C-4 report	3/12/2018	3/11/2018	\$4,2,08.96	\$186.95	\$186.95 for Credit Card Fees paid to First Bank Merchant Services.	0

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March 2018 C-4 report	4/10/2018	4/10/2018	\$13,574.83	\$13,296.96	\$1,500 made to Blue Wave Political Partners for Compliance and Fundraising Consulting; \$2,301.01 to Nilofar Ganjaie for Salary; \$4,006 to NWP Consulting for Graphic Design, Web Development and Printing Remits (1000) – overnight printing.	0
April 2018 C-4 report	5/10/2018	5/10/2018	\$9,387.46	\$10,268.24	\$3,250 to Blue Wave Political Partners for Compliance and Fundraising Consulting; \$4,122.44 to Nilofar Ganjaie for Salary; \$750 to NGP Van Inc for Software Rental; and \$546 to NWP Consulting for Printing and Graphic Designs.	0
May 2018 C-4 report	6/11/2018	6/9/2018	\$9,022.08	\$6,835.69	\$4,116.85 to Nilofar Ganjaie for Salary; \$477.76 to Secretary of State for Filing Fees.	
21-Day Pre Primary C-4 report	7/17/2018	7/25/2018 (Amended – original report filed timely)	\$105,617.36	\$87,735.85	Four expenditures made to Blue Wave Political Partners totaling \$9,750 for Fundraising and Compliance Consulting; \$1,361.25 made to Capitol City Press for Yard Signs; and 15 expenditures totaling \$42,791.35 NWP Consulting for Cable Advertising (7/16 – 8/6) Printing, Doorbell and Graphic Design; and \$6,175.27 to Nilofar Ganjaie for Salary.	0
2018 7-Day Pre Primary C-4 report	7/31/2018	7/31/2018	\$32,818.43	\$30,699.99	Four expenditures made to NWP Consulting totaling to \$3,555.81; \$3,120.36 to Publisher’s Mailing Service for Direct Mail Postage; and \$4,778.43 to McComb Sound for Media Production.	0

2018 Post-Primary C-4 report	9/10/2018	9/10/2018	\$54,517.77	\$58,067.45	Five expenditures made to NWP Consulting totaling \$24,342; Two expenditures totaling \$1,361.25 expenditure made to Capitol City Press for Yard Signs; and \$3,250 to Blue Wave Political Partners for Fundraising and Compliance Consulting.	0
2018 21-Day Pre-General C-4 Report	10/16/2018	10/16/2018	\$145,294.53	\$140,556.00	15 expenditures made to NWP Consulting totaling \$102,995 for Cable Advertising; Printing Doorbells; Graphic Designing; Webhosting; \$13,013.42 paid to Publisher's Mailing Services for Direct Mail Postage; \$4,018.23 made to McComb Sound for Media Production.	0
2018 7-Day Pre-General C-4 report	10/30/2018	10/30/2018	\$73,398.96	\$79,678.10	Six expenditures made to NWP Consulting totaling \$55,663.40 for a \$37,400 Online Advertising-DSP Political: Facebook/Instagram (10/1- 11/6); \$16,871.40 for Direct Mail Printing – Capitol City Press and Print Advertising – Federal Way Mirror (10/12, 10/19, 11/2); and \$1,300 for Digital Advertising- Federal Way Mirror (10/8-11/6).	0
2018 Post General election C-4 report	12/10/2018	12/10/2018	\$36,269.46	\$50,867.49	Eight expenditures made to NWP Consulting totaling \$28,000 for Cable Advertising (10/17-11/6); \$3,250 made to Blue Wave Political Partners for Fundraising and Compliance Consulting.	0

- The Campaign disclosed orders placed, debts or obligations on six C-4 reports filed for the 2018 election cycle, that included: (1) \$7,304.95 in orders placed disclosed on the 21-Day Pre-Primary C-4 report for a direct mail piece and Ad production; (2) \$13,645 in orders disclosed on the 7-Day Pre-Primary C-4 report for online advertising (7/19 – 8/7); (3) \$57,923.20 in orders disclosed on the 21-Day Pre-General C-4 report for the estimated cost of a direct mail piece, online ads on Facebook and Instagram (10/01 – 11/6), online ads in the

Federal Way Mirror (10/8-11/6); and (4) a \$28,000 order placed on the 7-Day Pre-General C-4 report for TV Ads (10/17 – 11/6).

- There was one candidate loan disclosed as having been made to the 2018 Campaign in the amount of \$21.38.
- The C-4 reports timely disclosed expenditure information for payments made to vendors using Campaign funds, largely involving political advertisements, and other miscellaneous Campaign services during the 2018 election cycle. The vendors receiving the largest Campaign expenditures during the 2018 election included the following:
 1. The Campaign made 61 expenditures to NWP Consulting totaling \$265,900.06 for services that included services for cable advertising, online, digital, print advertising, and printing mail pieces and door belling, graphic design work and consulting as detailed below:
 - 29 expenditures totaling \$154,865 for cable TV advertising.
 - Five expenditures totaling \$62,868.20 for online and digital advertising, and to print direct mail advertising.
 - 18 expenditures totaling \$16,238.90 for doorbell pieces, graphic design and overnight printing for advertising.
 2. The Campaign made 14 expenditures to Blue Wave Political Partners LLC totaling \$30,750 for Fundraising and Compliance Consulting for the periods 3/31 to 12/17.
 3. The Campaign made 20 expenditures totaling \$41,253.37 during the 2018 election to Nilofar Ganjaie for Campaign work, payroll taxes and other fees.
- As part of the audit, PDC staff requested the Campaign to provide copies of the books of account maintained for 15 expenditures listed below that were made by the 2018 Campaign including supporting documentation such as invoices, receipts, cancelled checks, notes, emails and any other pertinent materials.
- On February 4, 2021, the Campaign sent an email to the PDC with several attachments providing the requested books of account documentation for the expenditures listed in the Audit letter.

Audit Exhibit #1.

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

1. Two expenditures totaling \$51,380 were made to *Northwest Passage Consulting* (NWP) for Cable TV Advertising that included a \$26,790 expenditure made on October 9, 2018 for TV advertisements that ran on ESPN (covering 10/8 – 11/6/2018); and a \$24,590 expenditure was also made on October 9, 2018 for advertisements that ran on the Discovery Channel (covering 10/9 to 11/6/2018).

- The documentation provided by the Campaign included a copy of a \$100,000 check (#1042) dated 10/9/18 and written payable to *NWP Consulting* for invoice number 1811895 for “MEDIA BUY: Cable, Run dates: 10/8-11/6 – Vendor: Comcast.”
2. Two expenditures totaling \$51,045 were made to *NWP Consulting* for “Online Advertising” that included a \$37,400 expenditure made on October 29, 2018 to “DSP Political: Facebook/Instagram” for Campaign advertising covering 10/1 – 11/6/2018; and a \$13,645 expenditure made on August 7, 2018 to “DSP Political Facebook” for Campaign advertising covering 7/19 through 8/7/2018.
 - The documentation provided by the Campaign included a copy of: (a) \$13,645 check (#1028) dated 8/7/18 and written payable to *NWP Consulting* for invoice number 1811698 (dated 7/20/2018) for “ON LINE MEDIA: Preroll, display and Facebook ads, run dates 7/19 – 8/7/18 – Vendor: DS Political;” and (b) \$37,400 check (#1052) dated 10/30/18 and written payable to *NWP Consulting* for invoice number 1811904 (dated 10/5/2018) for “ON LINE MEDID: Preroll, display, Facebook and Instagram, run dates 10/1 – 11/6 – Vendor: DSP Political.”
 3. Two expenditures totaling \$15,296.40 were made to *NWP Consulting* for direct mail printing work performed by Capitol City Press that included two \$7,648.20 expenditures made on October 22 and 29, 2018.
 - The documentation provided by the Campaign included a copy of: (a) \$7,648.20 check (#1050) written on 10/22/18 payable to *NWP Consulting* for invoice number 1811960 received on 10/15/2018 for “Mailing: Intro and Accomplishments, 21,852 pcs for Print Vendor: Capitol City Press;” and (b) \$7,648.20 check dated 10/29/18 written payable to *NWP Consulting* for invoice number 1812013 dated 10/22/2018 for “MAILING: Values, 21,852 pcs – Print Vendor: Capitol City Press.”
 4. Two expenditures totaling \$13,013.42 were made to Publisher’s Mailing Service for direct mail postage that included a \$6,553.66 expenditure made on October 15, 2018; and a \$6,459.76 expenditure made on October 10, 2018.
 - The documentation provided by the Campaign included a copy of: (a) a \$6,553.66 check that was paid to the *Publisher’s Mailing Services* dated October 15, 2018 for invoice number 1166-18 – dated 10/13/2018; and (b) a check for \$6,459.76 check made payable to the *Publisher’s Mailing Services* dated 10/10/18 (check # 1043) for invoice number 1134-18 – dated 10/9/2018.
 5. Two expenditures totaling \$8,796.66 were made to McComb Sound for “Media Production” that included a \$4,018.23 expenditure made on October 10, 2018 and a \$4,778.43 expenditure made on July 23, 2018.
 - The documentation provided by the Campaign included a copy of: (a) \$4,018.23 check (#1044) that was paid to *McComb Sound* dated 10/10/18 for invoice number 18114; and check number 1024 for \$4,778.43 written payable to *McComb Sound* dated 7/23/18 for invoice number 18067.

6. Two expenditures totaling \$3,275 were made to NWP Consulting for newspaper advertising that ran in the Federal Way Mirror and included a \$1,700 expenditure made on July 25, 2018 (for Ads running from 7/20 through 8/3/2018) and a \$1,575 expenditure made on October 18, 2018 (for Ads running 10/12, 10/19 and 11/2/2018).
 - The documentation provided by the Campaign included a copy of a \$3,555.81 check (#1027) written on 7/25/18 for invoice 1811702 (dated 7/20/2018) for “MEDIA BUY: Print Ads 7/20-83 – Vendor: Federal Way Mirror.” The check was also for payment for invoices 1811693 and 1811675; and (b) \$2,977 check (#1049) written on 10/18/18 for invoice number 1811963 (dated 10/15/2018) for “ON LINE MEDIA: Print Ads, run dates 10/12, 10/19, 11/2 issues – Vendor: Federal Way Mirror.” This check was also payment for invoices 1811876 (\$10) and 1811969 (\$92).
7. Three expenditures totaling \$2,722.50 were made to *Capitol City Press* for “Campaign yard signs and yard sign materials” that included an expenditure made on July 13, 2018 for \$1,361.25 and two expenditures made on August 16, 2018 for \$987.50 and \$373.75.
 - The documentation provided by the Campaign included a copy of: (a) \$1,361.25 check (#1021) that was paid to *Capitol City Press* for invoice number 123015 (dated 7/9/2018); (b) \$1,361.25 check (#1030) written payable to *Capitol City Press* for invoice number 123736 received on 8/13/2018.

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

As part of the audit, PDC staff requested each campaign to provide information concerning general campaign practices such as internal compliance controls, procedures for processing, depositing, recording and disclosure of contribution, procedures for making and reporting expenditures, including for debts, obligations, and orders placed, in-kind contributions, and candidate loans. On February 4, 2021, the Campaign provided a response to staff’s questions about the internal control processes.

Audit Exhibit #2

Campaign Contributions:

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

The Campaign further stated that “Credit Card contributions were received through two merchant accounts: ActBlue and First Data Merchant Services. ActBlue contributions were imported to the filing software by Ms. Olsen, while First Data contributions integrated directly

into the filing software.” The Campaign stated that the contributions were deposited in the bank account within two business days of being processed, and the contributor information provided included name, address, employer, occupation, employer city, and employer state. The Campaign further stated each C3 report represented only deposit of the contributions received, and that all contributions were reconciled by the compliance team using QuickBooks accounting software, and this process was repeated at least once a week, or more often depending on weekly activity.” The treasurer’s office also provided a form to the campaign in order to record any non-monetary contributions.

Campaign Expenditures:

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

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

Contribution and Expenditure Reports:

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

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

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

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

IV.

Audit Documents Reviewed, Provided and Respondent Correspondence

- C-1 reports, C-3 reports and C-4 reports filed by the 2018 Claire Wilson for Senate Campaign covering the period February 1, through December 31, 2018.
- Email exchanges between PDC staff and Jay Petterson, with Blue Wave Consulting, on behalf of the 2018 Claire Wilson for State Senate Campaign.
- PDC staff queried the PDC Contribution and Expenditure database for the 2018 Claire Wilson for State Senate Campaign contribution and expenditure information covering the period of February 1 through December 31, 2018.

V.

Statutes and Rules

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

Respectfully submitted this ____ day of March 2021.

Erick O. Agina, MPA
PDC Compliance Officer

Audit Exhibits

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

Audit Exhibit #2 Letter from the 2018 Claire Wilson for Senate Campaign Treasurer provided by the Campaign to the PDC on February 4, 2021, concerning the campaign practices and procedures.

CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003

1042

19-2/1250 WA
98097

10/9/18 Date

Pay To The Order Of NWP Consulting \$ 100,000.00

one hundred thousand and 00/100 Dollars



Photo Safe Deposit®
Details on back

Bank of America 

ACH R/T 125000024

For INV# 1811895



MP

⑆ 1 250000 24 ⑆ 1 38 1 1 96 30 58 9 ⑆ 1042

Audit Exhibit #1
Page 1 of 39

NWP Consulting

105 S. Main Street, Ste 332
Seattle, WA 98104

Invoice

Date	Invoice #
10/5/2018	1811895

Bill To
Claire for Senate 31811 Pacific Hwy S, Ste B #288, Federal Way, WA 98003

Description	Amount
MEDIA BUY: Cable, Run dates: 10/8-11/6	100,000.00
Vendor: Comcast	
Sales Tax	0.00
Total	\$100,000.00

CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003

19-2/1250 WA
98097

10/30/18

Date

Pay To The
Order Of

NWP Consulting

\$ 37,400.00

thirty seven thousand four hundred and ⁰⁰/₁₀₀

Dollars



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ACH R/T 125000024

For INV# 1811904

MP

Audit Exhibit #1
Page 3 of 39

NWP Consulting

105 S. Main Street, Ste 332
Seattle, WA 98104

Invoice

Date	Invoice #
10/5/2018	1811904

Bill To
Claire for Senate 31811 Pacific Hwy S, Ste B #288, Federal Way, WA 98003

Description	Amount
ON LINE MEDIA: Preroll, display, facebook and instagram, run dates 10/1-11/6	37,400.00
Vendor: DSP Political	
Design: Groot Graphics	
Sales Tax	0.00
Total \$37,400.00	

CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003

19-2/1250 WA
98097

8/7/18

Date

Pay To The
Order Of

NWP Consulting

\$ 13,645.00

Thirteen thousand six hundred forty five and 00/100 Dollars

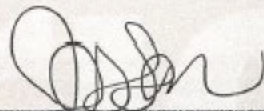


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AGH R/T 125000024

For INV# 1811698



MP

Audit Exhibit #1
Page 5 of 39

NWP Consulting

105 S. Main Street, Ste 332
Seattle, WA 98104

Invoice

Date	Invoice #
7/20/2018	1811698

Bill To
Claire for Senate 31811 Pacific Hwy S, Ste B #288, Federal Way, WA 98003

Description	Amount
ON LINE MEDIA: Preroll, display and facebook ads, run daes 7/19 -8/7/18 Vendor: DS Political	13,395.00
DESIGN: On line Media Vendor: Groot Productions	250.00
Sales Tax	0.00
Total	\$13,645.00

CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003

19-2/1250 WA
98097

10/22/18

Date

Pay To The
Order Of

NWP Consulting

\$ 7648.20

seven thousand six hundred forty eight and 20/100

Dollars



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ACH R/T 125000024

For INV# 1811960

MP

Audit Exhibit #1

Page 7 of 39

Invoice

NWP Consulting

105 S. Main Street, Ste 332
Seattle, WA 98104

Date	Invoice #
10/15/2018	1811960

Bill To
Claire for Senate 31811 Pacific Hwy S, Ste B #288, Federal Way, WA 98003

Description	Amount
MAILING: Intro and Accomplishments, 21,852 pcs	7,648.20
Print Vendor: Capitol City Press	.
Design Vendor: NWP Consulting	
Sales Tax	0.00
Total	\$7,648.20

CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003

19-2/1250 WA
98097

10/29/18 Date

Pay To The Order Of NWP Consulting \$ 7648.20

seven thousand six hundred forty eight and 20/100 Dollars



Bank of America

ACH R/T 125000024

For INV # 1812013

AUTHORISED SIGNATURE ONLY

MP

Audit Exhibit #1
Page 9 of 39

NWP Consulting

105 S. Main Street, Ste 332
Seattle, WA 98104

Invoice

Date	Invoice #
10/22/2018	1812013

Bill To
Claire for Senate 31811 Pacific Hwy S, Ste B #288, Federal Way, WA 98003

Description	Amount
MAILING: Values, 21,852 pcs	7,648.20
Print Vendor: Capitol City Press	
Design Vendor: NWP Consulting	
Sales Tax	0.00
Total	\$7,648.20

CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003



19-2/1250 WA
98097

10/10/18 Date

Pay To The Order Of Publisher's Mentoring Service | \$ 6459.76

six thousand four hundred fifty nine and 76/100 Dollars



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Details on back

Bank of America

ACH R/T 125000024

For INV# 1134-18



Audit Exhibit #1
Page 11 of 39



Invoice

9126 E Marginal Way S
Seattle WA 98108

Date	Invoice #
10/9/2018	1134-18

Phone: 206.448.0411
Email: data@ziplus4.com
Web: www.publishersmailingservice.com

BILL TO:

PAID FOR BY CLAIRE FOR SENATE
31811 PACIFIC HIGHWAY S
STE B #288
FEDERAL WAY, WA 98003

P.O. No.	Terms	Due Date
	C.O.D.	10/9/2018

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WILSON INTRO - QTY 21,310		
	DATA IMPORT	36.00	36.00
21.31	UPLOAD ADDRESSES	14.00	298.34
21.31	INKJET ADDRESSES-FLAT	14.00	298.34T
21.31	SORT & BAG: FLAT	17.00	362.27T
	PROCESSING FEE	24.50	24.50T
	FREIGHT	105.00	105.00T
	SUB TOTAL		1,124.45
	PERMIT 5544 POSTAGE	5,260.25	5,260.25

We appreciate your business!

We are unable to accept credit cards at this time, checks only please.

Sales Tax	\$75.06
Total	\$6,459.76
Balance Due	\$6,459.76

CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003



19-2/1250 WA
98097

10/15/18

Date

Pay To The
Order Of

Publishers Marketing Service

\$ 6553.66

six thousand five hundred fifty three and 66/100

Dollars



Photo
Safe
Deposit®
Details on back

Bank of America



ACH R/T 125000024

For Inv# 1166-18

MP

Audit Exhibit #1
Page 13 of 39



Invoice

9126 E Marginal Way S
Seattle WA 98108

Date	Invoice #
10/13/2018	1166-18

Phone: 206.448.0411
Email: data@ziplus4.com
Web: www.publishersmailingservice.com

BILL TO:

PAID FOR BY CLAIRE FOR SENATE
31811 PACIFIC HIGHWAY S
STE B #288
FEDERAL WAY, WA 98003

P.O. No.	Terms	Due Date
	C.O.D.	10/13/2018

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WILSON - VALUES - QTY 21,310		
21.31	DATA IMPORT	36.00	36.00
21.31	UPLOAD ADDRESSES	14.00	298.34
21.31	INKJET ADDRESSES-FLAT	14.00	298.34T
21.31	SORT & BAG: FLAT	17.00	362.27T
	PROCESSING FEE	24.50	24.50T
	FREIGHT	105.00	105.00T
	SUB TOTAL		1,124.45
	PERMIT 5544 POSTAGE	5,354.15	5,354.15

We appreciate your business!

We are unable to accept credit cards at this time, checks only please.

Sales Tax **\$75.06**

Total **\$6,553.66**

Balance Due **\$6,553.66**

CLAIRE FOR SENATE

31811 PACIFIC HWYS STE B #288
FEDERAL WAY, WA 98003

19-2/1250 WA
98097

10/10/18

Date

Pay To The
Order Of

McComb Sound

\$ 408.23

four thousand eighteen and ²³/₁₀₀

Dollars



Photo
Safe
Deposit®
Details on back

Bank of America



ACH R/T 125000024

For INV# 18114

MP

Audit Exhibit #1
Page 15 of 39

Wilson



2230 1st Avenue South
Seattle, WA 98134

Date
10/09/18

Due Date
10/24/18

Invoice No.
18114

Terms
Net 15

P.O. Number

Bill To:
 Northwest Passage Consulting
 105 S Main Street, Suite 332
 Seattle, WA 98104

Project
1809135 Claire Wilson TV

Description	Quantity	Rate	Amount
Camera operator and production equipment	1	900.00	900.00
Line producer / director of photography	1	800.00	800.00
Location audio engineer	1	600.00	600.00
Clips file conversion, sync, and raw footage assembly	3	75.00	225.00
Design for video graphics	1	75.00	75.00
Video editorial and revisions	4	150.00	600.00
License for needledrop music, local TV	1	200.00	200.00T
Music search, audio editing, and broadcast mix	3	150.00	450.00
Online trafficking services to Comcast	1	75.00	75.00
Encoding and upload per spot	1	40.00	40.00
Project archival	1	30.00	30.00T
Tax		10.10%	23.23

Total	\$4,018.23
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Audit Exhibit #1
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CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003

19-2/1250 WA
98097

7/23/18

Date

Pay To The
Order Of

McComb Sound

\$ 4778.43

four thousand seven hundred seventy eight and ⁴³/₁₀₀

Dollars



Photo
Safe
Deposit®
Details on back

Bank of America



ACH R/T 125000024

For

INV# 18067

[Handwritten Signature]

MP

Audit Exhibit #1

Page 17 of 39



2230 1st Avenue South
Seattle, WA 98134

Date
07/18/18

Due Date
08/02/18

Invoice No.
18067

Terms
Net 15

Bill To:
Northwest Passage Consulting
105 S Main Street, Suite 332
Seattle, WA 98104

P.O. Number

Project
1807089 Claire Wilson TV/Web

Description	Quantity	Rate	Amount
Camera operator and production equipment	1	900.00	900.00
Line producer / director of photography	1	800.00	800.00
Location audio engineer	1	500.00	500.00
Clips sync, raw footage assembly (07/08)	3	75.00	225.00
Design for video graphics	2	75.00	150.00
Video editorial (07/10)	4	150.00	600.00
Video revisions (07/11, 07/12)	4.5	150.00	675.00
License for needledrop music, local TV and digital	2	200.00	400.00T
Music search, audio editing, and broadcast mix	2	150.00	300.00
Online trafficking services to Comcast	1	75.00	75.00
Encoding and upload per spot	2	40.00	80.00
Project archival	1	30.00	30.00T
Tax		10.10%	43.43
Total			\$4,778.43

Audit Exhibit #1
Page 18 of 39

CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003

19-2/1250 WA
98097

10/18/18

Date

Pay To The
Order Of

NWP Consulting

\$ 2977.00

two thousand nine hundred seventy seven and 00/100 Dollars



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ACH R/T 125000024

For INV# 1811876, 1811969, 1811963

MP

Audit Exhibit #1
Page 19 of 39

NWP Consulting

105 S. Main Street, Ste 332
Seattle, WA 98104

Invoice

Date	Invoice #
9/28/2018	1811876

Bill To
Claire for Senate 31811 Pacific Hwy S, Ste B #288, Federal Way, WA 98003

Description	Amount
ON LINE MEDIA: Facebook ad, Sept 4th - 9th	10.00
Vendor: Facebook	
Sales Tax	0.00
Total	\$10.00

NWP Consulting

105 S. Main Street, Ste 332
Seattle, WA 98104

Invoice

Date	Invoice #
10/15/2018	1811963

Bill To
Claire for Senate 31811 Pacific Hwy S, Ste B #288, Federal Way, WA 98003

Description	Amount
ON LINE MEDIA: Digital Ads, run dates 10/8-11/6 Vendor: Federal Way Mirror Design: Groot Graphics	1,300.00
ON LINE MEDIA: Print Ads, run dates 10/12, 10/19, 11/2 issues Vendor: Federal Way Mirror Design: Groot Graphics	1,575.00
Sales Tax	0.00
Total	\$2,875.00

CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003

19-2/1250 WA
98097

7/25/18

Date

Pay To The Order Of NWP Consulting

\$ 3555.81

three thousand five hundred fifty five and 81/100

Dollars



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Bank of America 

ACH R/T 125000024

For INV# 1811702, 1811693, 1811675

MP

Audit Exhibit #1
Page 23 of 39

NWP Consulting

105 S. Main Street, Ste 332
Seattle, WA 98104

Invoice

Date	Invoice #
7/20/2018	1811702

Bill To
Claire for Senate 31811 Pacific Hwy S, Ste B #288, Federal Way, WA 98003

Description	Amount
MEDIA BUY: Print Ads 7/20-8/3 Vendor: Federal Way Mirror	1,700.00
DESIGN: Print ads Vendor: Groot Graphics	230.00
Sales Tax	0.00
Total	\$1,930.00

NWP Consulting

105 S. Main Street, Ste 332
Seattle, WA 98104

Invoice

Date	Invoice #
7/16/2018	1811693

Bill To
Claire for Senate 31811 Pacific Hwy S, Ste B #288, Federal Way, WA 98003

Description	Amount
MAILING: 6649 PCS Letter to Neighbors	1,165.00
Print Vendor: Trade Printer	
Design Vendor: NWP Consulting	
Sales Tax	0.00
Total	\$1,165.00

CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003

19-2/1250 WA
98097

7/13/18 Date

Pay To The
Order Of

Capitol City Press

\$ 1361.25

one thousand three hundred sixty one and 25/100 Dollars



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Bank of America

ACH R/T 125000024

For INV# 123015

MP

Audit Exhibit #1
Page 27 of 39



INVOICE

CAPITOL CITY PRESS

2975 37th Ave SW • Tumwater, WA 98512
(360) 943-3556 • FAX: (360) 943-2140
AVR email • tabitha@capitolcitypress.com

INVOICE DATE 7/9/2018

INVOICE NUMBER 123015

CUSTOMER NUMBER 5341

S
O
L
D

T
O

NORTHWEST PASSAGE CONSULTING
105 S. MAIN ST SUITE 332
SEATTLE, WA 98104
USA

Remit to Address:
Capitol City Press Inc
2975 37th Ave SW
Tumwater, WA 98512

PURCHASE ORDER NO.	ORDERED BY	JOB TICKET	SALESPERSON	TERMS
WILSON YARD SIG	ERIN	TSS5255	TSS	net 30

DESCRIPTION	
250 - 24 X 18 YARD SIGNS CLAIRE WILSON FOR STATE SENATE	987.50
250 - METAL STAKES	250.00
FEDERAL WAY, WA	
Sales Tax	123.75
TOTAL	1,361.25
Payment due on or before 8/8/2018	

1 1/2% per month service charge on past due accounts.

Please Pay From This Invoice

Visit us at our website: www.capitolcitypress.com

Audit Exhibit #1

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CLAIRE FOR SENATE

31811 PACIFIC HWY S STE B #288
FEDERAL WAY, WA 98003

19-2/1250 WA
98097

8/16/18

Date

Pay To The
Order Of

Capitol City Press

\$ 1361.25

one thousand three hundred sixty one and

25/100

Dollars



Photo
Safe
Deposit®
Details on back

Bank of America



ACH R/T 125000024

For INV # 123736

MP

Audit Exhibit #1
Page 29 of 39



INVOICE

CAPITOL CITY PRESS

2975 37th Ave SW • Tumwater, WA 98512
(360) 943-3556 • FAX: (360) 943-2140
A/R email • tabitha@capitolcitypress.com

INVOICE DATE 8/13/2018

INVOICE NUMBER 123736

CUSTOMER NUMBER 5341

S
O
L
D

T
O

NORTHWEST PASSAGE CONSULTING
105 S. MAIN ST SUITE 332
SEATTLE, WA 98104
USA

Remit to Address:
Capitol City Press Inc
2975 37th Ave SW
Tumwater, WA 98512

PURCHASE ORDER NO.	ORDERED BY	JOB TICKET	SALESPERSON	TERMS
CLAIRE WILSON YA	ERIN	TSS5299	TSS	net 30

DESCRIPTION		
250 - 18 X 24 YARD SIGNS CLAIRE WILSON FOR STATE SENATE		987.50
250 - WOOD STAKES		250.00
	Sales Tax	123.75
	TOTAL	1,361.25
	Payment due on or before 9/12/2018	

1 1/2% per month service charge on past due accounts.

Please Pay From This Invoice

Visit us at our website: www.capitolcitypress.com

Audit Exhibit #1

Claire Wilson LD30 - NWP - 100K - NPE 10.8 thru 11.6

Demo Adults 25-54
Date 09/28/2018

All-Wks Avrg

	Rate \$\$.00	Tot \$\$.00	RC \$	RC %	Unit/ Wk	Unit Tot	Unit Dur	DP Code	Start Date	End Date	Prog Name	Rtg
Total	\$100000.00	\$100000.00				1054						
Seattle-Tacoma 2BK Oct16- Nov16 DMA Nielsen Live+7	\$100000.00	\$100000.00				1054						
8474, Federal Way/Auburn	\$100000.00	\$100000.00				1054						
CNN -TV	\$10930.00	\$10930.00				132						
M-Su 9a-4p	\$25.00	\$350.00	\$25.00	100%	3	14	30	DP	10/8/18	10/14/18	VARIOUS	0.3
M-Su 9a-4p	\$40.00	\$1680.00	\$40.00	100%	8	42	30	DP	10/15/18	11/6/18	VARIOUS	0.3
M-Su 4p-7p	\$95.00	\$665.00	\$95.00	100%	1	7	30	DP	10/8/18	10/14/18	VARIOUS	0.5
M-Su 4p-7p	\$155.00	\$3255.00	\$155.00	100%	4	21	30	DP	10/15/18	11/6/18	VARIOUS	0.5
M-Su 7p-12m	\$70.00	\$840.00	\$70.00	100%	2	12	30	DP	10/8/18	10/14/18	VARIOUS	0.5
M-Su 7p-12m	\$115.00	\$4140.00	\$115.00	100%	7	36	30	DP	10/15/18	11/6/18	VARIOUS	0.5
DISC-TV	\$24590.00	\$24590.00				136						
M-Su 9a-4p	\$40.00	\$560.00	\$40.00	100%	3	14	30	DP	10/8/18	10/14/18	VARIOUS	0.1
M-Su 9a-4p	\$65.00	\$2730.00	\$65.00	100%	8	42	30	DP	10/15/18	11/6/18	VARIOUS	0.1
M-Su 4p-7p	\$180.00	\$1260.00	\$180.00	100%	1	7	30	DP	10/8/18	10/14/18	VARIOUS	0.3
M-Su 4p-7p	\$295.00	\$6195.00	\$295.00	100%	4	21	30	DP	10/15/18	11/6/18	VARIOUS	0.3
M-Su 7p-12m	\$180.00	\$2340.00	\$180.00	100%	3	13	30	DP	10/8/18	10/14/18	VARIOUS	0.4
M-Su 7p-12m	\$295.00	\$11505.00	\$295.00	100%	8	39	30	DP	10/15/18	11/6/18	VARIOUS	0.4
DIY -TV	\$380.00	\$380.00				76						
M-Su 4p-7p	\$5.00	\$35.00	\$5.00	100%	1	7	30	DP	10/8/18	10/14/18	VARIOUS	0.0
M-Su 4p-7p	\$5.00	\$105.00	\$5.00	100%	4	21	30	DP	10/15/18	11/6/18	VARIOUS	0.0
M-Su 7p-12m	\$5.00	\$60.00	\$5.00	100%	2	12	30	DP	10/8/18	10/14/18	VARIOUS	0.1

M-Su 7p-12m	\$5.00	\$180.00	\$5.00	100%	7	36	30	DP	10/15/18	11/6/18	VARIOUS	0.1
ESPN-TV	\$26790.00	\$26790.00				132						
M-Su 9a-4p	\$65.00	\$975.00	\$65.00	100%	3	15	30	DP	10/8/18	10/14/18	VARIOUS	0.4
M-Su 9a-4p	\$105.00	\$4725.00	\$105.00	100%	9	45	30	DP	10/15/18	11/6/18	VARIOUS	0.4
M-Su 4p-7p	\$210.00	\$1260.00	\$210.00	100%	1	6	30	DP	10/8/18	10/14/18	VARIOUS	1.1
M-Su 4p-7p	\$345.00	\$6210.00	\$345.00	100%	4	18	30	DP	10/15/18	11/6/18	VARIOUS	1.1
M-Su 7p-12m	\$190.00	\$2280.00	\$190.00	100%	2	12	30	DP	10/8/18	10/14/18	VARIOUS	1.4
M-Su 7p-12m	\$315.00	\$11340.00	\$315.00	100%	7	36	30	DP	10/15/18	11/6/18	VARIOUS	1.4
FS1 -TV	\$1640.00	\$1640.00				128						
M-Su 9a-4p	\$10.00	\$140.00	\$10.00	100%	3	14	30	DP	10/8/18	10/14/18	VARIOUS	0.2
M-Su 9a-4p	\$10.00	\$420.00	\$10.00	100%	8	42	30	DP	10/15/18	11/6/18	VARIOUS	0.2
M-Su 4p-7p	\$15.00	\$90.00	\$15.00	100%	1	6	30	DP	10/8/18	10/14/18	VARIOUS	0.3
M-Su 4p-7p	\$15.00	\$270.00	\$15.00	100%	4	18	30	DP	10/15/18	11/6/18	VARIOUS	0.3
M-Su 7p-12m	\$15.00	\$180.00	\$15.00	100%	2	12	30	DP	10/8/18	10/14/18	VARIOUS	0.3
M-Su 7p-12m	\$15.00	\$540.00	\$15.00	100%	7	36	30	DP	10/15/18	11/6/18	VARIOUS	0.3
FX -TV	\$7460.00	\$7460.00				76						
M-Su 4p-7p	\$95.00	\$665.00	\$95.00	100%	1	7	30	DP	10/8/18	10/14/18	VARIOUS	0.2
M-Su 4p-7p	\$95.00	\$1995.00	\$95.00	100%	4	21	30	DP	10/15/18	11/6/18	VARIOUS	0.2
M-Su 7p-12m	\$100.00	\$1200.00	\$100.00	100%	2	12	30	DP	10/8/18	10/14/18	VARIOUS	0.4
M-Su 7p-12m	\$100.00	\$3600.00	\$100.00	100%	7	36	30	DP	10/15/18	11/6/18	VARIOUS	0.4
HGTV-TV	\$10365.00	\$10365.00				81						
M-Su 9a-4p	\$65.00	\$1040.00	\$65.00	100%	3	16	30	DP	10/8/18	10/14/18	VARIOUS	0.2
M-Su 9a-4p	\$105.00	\$4725.00	\$105.00	100%	9	45	30	DP	10/15/18	11/6/18	VARIOUS	0.2
M-Su 7p-12m	\$155.00	\$775.00	\$155.00	100%	1	5	30	DP	10/8/18	10/14/18	VARIOUS	0.4
M-Su 7p-12m	\$255.00	\$3825.00	\$255.00	100%	3	15	30	DP	10/15/18	11/6/18	VARIOUS	0.4
HIST-TV	\$10965.00	\$10965.00				105						
M-Su 9a-4p	\$30.00	\$450.00	\$30.00	100%	3	15	30	DP	10/8/18	10/14/18	VARIOUS	0.1
M-Su 9a-4p	\$50.00	\$2250.00	\$50.00	100%	9	45	30	DP	10/15/18	11/6/18	VARIOUS	0.1
M-Su 7p-12m	\$125.00	\$1500.00	\$125.00	100%	2	12	30	DP	10/8/18	10/14/18	VARIOUS	0.3
M-Su 7p-12m	\$205.00	\$6765.00	\$205.00	100%	7	33	30	DP	10/15/18	11/6/18	VARIOUS	0.3
MNBC-TV	\$6130.00	\$6130.00				85						
M-Su 4p-7p	\$55.00	\$385.00	\$55.00	100%	1	7	30	DP	10/8/18	10/14/18	VARIOUS	0.4
M-Su 4p-7p	\$90.00	\$1890.00	\$90.00	100%	4	21	30	DP	10/15/18	11/6/18	VARIOUS	0.4
M-Su 7p-12m	\$45.00	\$630.00	\$45.00	100%	3	14	30	DP	10/8/18	10/14/18	VARIOUS	0.5

			M-Su 7p-12m	\$75.00	\$3225.00	\$75.00	100%	9	43	30	DP	10/15/18	11/6/18	VARIOUS	0.5
			WETV-TV	\$750.00	\$750.00				103						
			M-Su 9a-4p	\$5.00	\$70.00	\$5.00	100%	3	14	30	DP	10/8/18	10/14/18	VARIOUS	0.0
			M-Su 9a-4p	\$5.00	\$210.00	\$5.00	100%	8	42	30	DP	10/15/18	11/6/18	VARIOUS	0.0
			M-Su 7p-12m	\$10.00	\$120.00	\$10.00	100%	2	12	30	DP	10/8/18	10/14/18	VARIOUS	0.1
			M-Su 7p-12m	\$10.00	\$350.00	\$10.00	100%	7	35	30	DP	10/15/18	11/6/18	VARIOUS	0.1

This report has been prepared using Strata NuMath research.

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Adjustments: Network Insertability and Network Carriage have been factored into calculations.

Seattle-Tacoma 2BK Oct16-Nov16 DMA Nielsen Live+7

Cable Zones: COMCAST, Federal Way/Auburn

Wk 1 - Wk 5							Wk 1	Wk 2	Wk 3	Wk 4	Wk 5
Adults 25-54							10/8	10/15	10/22	10/29	11/5
Imp	CPP \$\$	CPM Imp	GRP	Rch %	Freq	Pop	'18	'18	'18	'18	'18
364843	\$283	274.09	353.7	72.2%	5.0	100426	265	263	263	262	1
364843	\$283	274.09	353.7	72.2%	5.0	100426	265	263	263	262	1
364843	\$283	274.09	353.7	72.2%	5.0	100426	265	263	263	262	1
54871	\$199	199.19	54.8	9.0%	6.1	100426	33	33	33	33	
270	\$83	92.69	4.2	2.3%	1.7	100426	14				
270	\$133	148.31	12.6	3.7%	3.1	100426		14	14	14	
520	\$190	182.57	3.5	2.5%	1.4	100426	7				
520	\$310	297.87	10.5	4.5%	2.4	100426		7	7	7	
525	\$140	133.35	6.0	3.8%	1.6	100426	12				
525	\$230	219.07	18.0	6.3%	3.0	100426		12	12	12	
39528	\$707	622.08	34.8	16.0%	2.5	100426	34	34	34	34	
145	\$400	275.84	1.4	1.7%	1.2	100426	14				
145	\$650	448.23	4.2	3.9%	1.6	100426		14	14	14	
320	\$600	562.80	2.1	2.0%	1.1	100426	7				
320	\$983	922.37	6.3	4.6%	1.4	100426		7	7	7	
432	\$450	416.88	5.2	4.7%	1.2	100426	13				
432	\$737	683.22	15.6	10.3%	1.6	100426		13	13	13	
4167	\$79	91.19	4.8	0.9%	4.9	100426	19	19	19	19	
49	\$0	101.54	0.0	0.2%	1.4	100426	7				
49	\$0	101.54	0.0	0.4%	2.4	100426		7	7	7	
58	\$50	86.07	1.2	0.4%	1.6	100426	12				

58	\$50	86.07	3.6	0.7%	3.0	100426		12	12	12	
121493	\$228	220.51	117.6	49.3%	2.5	100426	33	33	33	33	
443	\$163	146.87	6.0	5.5%	1.2	100426	15				
443	\$263	237.25	18.0	12.2%	1.6	100426		15	15	15	
1140	\$191	184.13	6.6	6.2%	1.1	100426	6				
1140	\$314	302.50	19.8	15.1%	1.4	100426		6	6	6	
1408	\$136	134.98	16.8	14.2%	1.2	100426	12				
1408	\$225	223.78	50.4	31.9%	1.6	100426		12	12	12	
30816	\$50	53.22	32.8	5.2%	5.9	100426	32	32	32	32	
171	\$50	58.53	2.8	1.4%	1.7	100426	14				
171	\$50	58.53	8.4	2.3%	3.1	100426		14	14	14	
285	\$50	52.55	1.8	1.3%	1.4	100426	6				
285	\$50	52.55	5.4	2.3%	2.2	100426		6	6	6	
300	\$50	50.01	3.6	2.2%	1.6	100426	12				
300	\$50	50.01	10.8	3.6%	3.0	100426		12	12	12	
26965	\$301	276.65	24.8	6.0%	4.5	100426	19	19	19	19	
206	\$475	461.82	1.4	1.0%	1.4	100426	7				
206	\$475	461.82	4.2	1.8%	2.4	100426		7	7	7	
442	\$250	226.36	4.8	3.2%	1.6	100426	12				
442	\$250	226.36	14.4	5.3%	3.0	100426		12	12	12	
20844	\$513	497.27	20.2	4.8%	4.4	100426	21	20	20	20	
211	\$325	308.01	3.2	1.9%	1.8	100426	16				
211	\$525	497.56	9.0	3.0%	3.2	100426		15	15	15	
399	\$388	388.91	2.0	1.6%	1.2	100426	5				
399	\$638	639.82	6.0	3.3%	1.8	100426		5	5	5	
21105	\$562	519.55	19.5	4.0%	5.2	100426	27	26	26	26	
133	\$300	225.86	1.5	1.2%	1.7	100426	15				
133	\$500	376.43	4.5	1.9%	3.2	100426		15	15	15	
292	\$417	428.24	3.6	2.1%	1.6	100426	12				
292	\$683	702.32	9.9	3.4%	2.8	100426		11	11	11	
38736	\$154	158.25	39.7	7.2%	5.4	100426	21	21	21	21	1
442	\$138	124.50	2.8	2.2%	1.4	100426	7				
442	\$225	203.73	8.4	3.8%	2.4	100426		7	7	7	
463	\$90	97.28	7.0	3.7%	1.7	100426	14				

463	\$150	162.14	21.5	5.8%	3.4	100426		14	14	14	1
6317	\$160	118.73	4.7	1.4%	4.5	100426	26	26	26	25	
26	\$0	189.50	0.0	0.2%	1.7	100426	14				
26	\$0	189.50	0.0	0.4%	3.1	100426		14	14	14	
103	\$100	97.12	1.2	0.8%	1.6	100426	12				
103	\$100	97.12	3.5	1.2%	3.0	100426		12	12	11	



State of Washington

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908

(360) 753-1111 • FAX (360) 753-1112

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

January 25, 2021

Sent Electronically to the 2018 Claire Wilson Campaign

Subject: PDC Audit Letter, 2018 Clair Wilson for Senate Campaign
PDC Audit No. 20-04

Senator Wilson:

This letter is a follow-up to the email PDC staff recently sent to you and your 2018 Campaign informing you had been selected for audit, and that you would be receiving a letter via email from staff notifying you about the audit shortly. Pursuant to RCW 42.17A.105 and .110, the Public Disclosure Commission (PDC) has a mandate to conduct audits of candidates, committees and other filing entities. Based on that authority, PDC staff has in the past conducted audits of candidates and political committees, lobbyist and lobbyist employers, and state agency lobbying activities in accordance with chapter 42.17 RCW. The PDC began conducting limited-scope audits in December of 2020, the first audits conducted by PDC staff in ten years.

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

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

Based on the criteria listed above, the two candidates that appeared on the 2018 primary and general election ballot for the Senate race in the 30th Legislative District were selected for a limited-scope audit. For your information, the majority of the audit work will involve PDC staff reviewing information disclosed by your 2018 Campaign on C-3 reports and C-4 reports that were filed electronically, and confirmation of select contributor(s) and vendor(s) information.

With that said, please provide staff with documentation from your 2018 Campaign, including copies of campaign books of account maintained by the Campaign for the expenditures listed below.

The documentation being requested includes copies of invoices, receipts, cancelled checks, emails and other memoranda, as well as select contributor(s) and Last-Minute Contribution (LMC) information would be part of this request, specifically for the following expenditures:

1. Two expenditures totaling \$51,380 were made to Northwest Passage Consulting for Cable TV Advertising that included a \$26,790 expenditure made on October 9, 2018, for advertisements that ran on ESPN (covering 10/8 – 11/6/2018); and a \$24,590 expenditure also made on October 9, 2018 for advertisements that ran on The Discovery Channel (covering 10/9 to 11/6/2018).
2. Two expenditures totaling \$51,045 were made to Northwest Passage Consulting for “Online Advertising” that included a \$37,400 expenditure made on October 29, 2018, to “DSP Political: Facebook/Instagram” advertising covering 10/1 – 11/6/2018; and a \$13,645 expenditure made on August 7, 2018, to “DSP Political Facebook” advertising covering 7/19 through 8/7/2018.
3. Two expenditures totaling \$15,296.40 were made to Northwest Passage Consulting for direct mail printing work conducted by Capitol City Press that included two \$7,648.20 expenditures made on October 22 and 29, 2018, respectively.
4. Two expenditures totaling \$9,580.12 were made to Publisher’s Mailing Service for direct mail postage that included a \$6,553.66 expenditure made on October 15, 2018; and a \$6,459.76 expenditure made on October 10, 2018.
5. Two expenditures totaling \$8,796.66 were made to McComb Sound for “Media Production” that included a \$4,018.23 expenditure made on October 10, 2018; and a \$4,778.43 expenditure made on July 23, 2018.
6. Two expenditures totaling \$3,275 were made to Northwest Passage Consulting for newspaper advertising that ran in the Federal Way Mirror and included a \$1,700 expenditure made on July 25, 2018 (for ads running 7/20 through 8/3/2018); and a \$1,575 expenditure made on October 18, 2018 (for ads running 10/12, 10/19, and 11/2/2018, respectively).
7. Three expenditures totaling \$2,722.50 were made to Capitol City Press for Campaign yard signs and yard sign materials that included an expenditure made on July 13, 2018, (\$1,361.25); and two expenditures made on August 16, 2018 (\$987.50 and \$373.75).

Staff is also requesting that each Campaign provide a response concerning 2018 general campaign practices, internal campaign compliance controls, and procedures for processing and recording contribution and expenditure activities, including orders placed and in-kind contributions. The questions and Campaign practices for which a response is being requested, includes the following:

1. Explain the 2018 Campaign contribution process from receipt of a contribution, to entering the contributor information into ORCA, the name of the person depositing the contributions, how often were contributions deposited, and the filing of the C-3 report. In addition, if online contributions were received by the Campaign, please explain how those contributions were processed as well.
2. Explain the 2018 Campaign expenditure process including the placing of the orders for political advertisements, identifying who placed the orders, to making the expenditure, picking up the goods and/or services provided, and the disclosing of the expenditure on the C-4 report. In addition, explain the process for disclosing orders placed.

3. Describe the process for reviewing and filing the C-3 and C-4 reports, the communication that occurs between the candidate and the Treasurer concerning the contribution and expenditure information being disclosed. In addition, does the candidate review the reports either before or after they have been filed.
4. Describe how the Campaign records are maintained for all contribution and expenditure activities, and what those records include.
5. Who was responsible for the Campaign records, did the Campaign make the books of account available during the public inspection period, was an inspection requested, and if so, what documents were made available during the inspection?
6. Did the candidate or any Campaign officers or volunteers receive reimbursements during the 2018 election year? If yes, please describe how the Campaign handled the reimbursements, the documentation that was required for reimbursement, and how those records were maintained.

Please provide copies of the requested expenditure documentation, and a response to the PDC questions and issues regarding the various campaign practices no later than **February 12, 2021**. PDC staff realizes it has been more than two years since the 2018 general election was held, so if you need additional time, please do not hesitate to contact Kurt Young, PDC Compliance Officer.

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

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

Sincerely,

Endorsed by,

/s _____
 Electronically Signed Kurt Young
 Compliance Officer

/s _____
 Electronically Signed Peter Lavalley,
 PDC Executive Director



Claire Wilson for State Senate
401 2nd Ave S Ste 303
Seattle, WA 98104
josie@bluewavepolitics.co

February 4th, 2021

Public Disclosure Commission
pdc@pdc.wa.gov

Re: PDC Audit Letter, 2018 Claire Wilson for Senate

To Whom It May Concern:

This letter responds to audit request received by the Claire Wilson for State Senate 2018 campaign committee. Under the direction of Jay Petterson, the campaign treasurer, I have provided responses to the questions in the audit letter.

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

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

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

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

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

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

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

Sincerely,

Josie Olsen
Blue Wave Political Partners