



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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July 12, 2021

Sent Electronically to Representative Vicki Kraft and Paul Kraft, Treasurer

Subject: Audit Report – Vicki Kraft 2020 State Representative Campaign

Dear Representative Kraft and Mr. Kraft:

This letter is to inform you that the Public Disclosure Commission (PDC) staff has completed the limited-scope audit of the 2020 Vicki Kraft for State Representative Campaign (Campaign). Staff's audit found the following:

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

Thank you both for fully cooperating with the PDC staff during this audit. If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdc.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

2020 Vicki Kraft State
Representative Campaign

PDC Audit No. 20-12

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 rules for reporting, and if necessary, for enforcement. The Commission believes that the primary purposes of conducting audits are to:
 1. Verify that the information disclosed on candidate and political committee campaign finance reports is timely and accurate in accordance with RCW 42.17A.
 2. Determine whether candidates and political committees are in substantial compliance with the law, rules and reporting requirements.
 3. Evaluate record keeping and reporting procedures used by filers and suggest corrective action to ensure future compliance with the law, or law/rule changes as necessary depending on the audit findings.

- PDC staff selected four State Representative races from the 2020 election cycle, involving eight candidates for limited-scope audits to be conducted based on the audit criteria established by staff. The audit criteria included that both 2020 State Representative candidates in each Legislative District were in a contested 2020 general election, with both candidates disclosing significant contribution and expenditure activities, and the election generated significant public interest.

II. **Audit Background**

- On June 17, 2019, Vicki Kraft filed a Candidate Registration (C-1 report) declaring her candidacy for election to the office of State Representative, Position 1, in the 17th Legislative District in 2020, selecting the Full Reporting Option and listing Paul Kraft as Treasurer.
- On April 22, 2021, the PDC staff sent an email to Representative Vicki Kraft and Mr. Paul Kraft, Treasurer for the 2020 Vicki Kraft for State Representative Campaign, and attached a letter notifying them that staff was conducting audits of four 2020 contested State Representative races. The letter stated staff was conducting a limited-scope audit of the two 2020 candidates that ran for State Representative in the 17th Legislative District, Position 1, which included Representative Kraft. 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 to the PDC rules to further clarify a specific reporting requirement.
- The limited-scope audits consist primarily of reviewing the Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by each Campaign, and queries conducted by PDC staff of the contribution and expenditure databases on the PDC website. The information is reviewed to determine the Campaign's timeliness and accuracy in disclosing contribution and expenditure activities undertaken on the C-3 and C-4 reports in accordance with the reporting requirements found in RCW 42.1A.235 and .240.
- The information is reviewed to determine the Campaigns' timeliness and accuracy in disclosing contribution and expenditure activities undertaken on the C-3 and C-4 reports in accordance with the reporting requirement under RCW 42.17A.235 and .240.

III. **Audit Findings**

- The 2020 Vicki Kraft for State Representative (Campaign) disclosed \$115,660.61 in total contributions received and \$107,916.06 in total expenditures made during the 2020 election cycle, with \$7,744.55 as cash on hand balance through December 31, 2020 on the “Final C-4 report” timely filed on February 3, 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, 2018 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 May 31, 2019 through November 3, 2020, that included 1,499 separate monetary and in-kind contributions totaling \$115,660.61. The \$115,660.61 in total monetary and in-kind contributions received included anonymous contributions as disclosed on C-3 reports.
- The Campaign’s two largest contributors in 2020 included the following political party and caucus political committees:
 1. House Republican Organizational Committee (HROC): A total of \$5,000.00 in in-kind contribution was received from HROC on October 24, 2020 for “Banner ads.”
 2. Clark County Republican Party (CCRP): Legislative District Committee: A total of \$1,250.00 in cash contribution was received on October 22, 2020.
- The Campaign disclosed receiving anonymous contributions totaling \$600 in the 2020 election cycle. This was a lumpsum contribution received on August 25, 2020. The statutory anonymous contribution limit is \$300 or one percent of the total contributions received in a calendar year, whichever is greater.
- 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 May 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 in the preceding seven calendar days. The 2020 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
5/12/2020	5/14/2020	Two contributions from two PACs for \$250 and \$1,000.	\$1,250.00	5/21/2020	0
5/30/2020	6/2/2020	Two-page C-3 report depicting nine itemized contributions from individuals ranging from \$25 to \$1000.	\$2,325.00	6/2/2020	0
6/4/2020	6/5/2020	Four-page C-3 report depicting 31 itemized contributions from individuals and entities ranging from \$12.50 to \$750.	\$4,635.00	6/5/2020	0
6/11/2020	6/11/2020	Two-page C-3 report depicting seven itemized contributions from individuals ranging from \$500 to \$1,000.	\$6,500.00	6/11/2020	0
7/12/20 – 7/14/2020	7/2/2020	Two-page C-3 report depicting six itemized contributions rec'd from individuals and entities ranging from \$30 to \$1,000.	\$2,280.00	7/2/2020	0
7/6/2020	7/15/2020	Four contributions received from two entities and two individuals ranging from \$20 to \$1,000.	\$1,540.00	7/15/2020	0
7/17/20 -7/20/20	7/20/2020	Three contributions received from three entities and one individual ranging from \$50 to \$1,000.	\$2,050.00	7/20/2020	0
7/22/2020	7/22/2020	Two contributions received from one entity and one PAC (Potato PAC).	\$1,500.00	7/22/2020	0
7/28/20 – 7/29/2020	7/29/2020	Three contributions received from three entities.	\$1,250.00	7/29/2020	0
8/3/2020	8/3/2020	Three contributions received from one entity and two PACs.	\$2,200.00	8/3/2020	0
8/6/2020	8/7/2020	One contribution from a PAC.	\$1,000.00	8/7/2020	0
8/22/20 – 8/26/2020	8/26/2020	Two-page C-3 report depicting contributions received from ten individuals ranging from \$5 to \$100.	\$1,680.00	8/26/2020	0
8/26/20 – 8/31/2020	8/31/2020	Two-page C-3 report depicting contributions from one entity and 15 individuals ranging from \$12.50 to \$1,000.	\$2,710.00	9/1/2020	0
8/29/20 – 9/2/2020	9/2/2020	Two-page C-3 report depicting eight contributions from individuals and one PAC ranging from \$50 to \$500.	\$7,330.00	9/2/2020	0
9/8/20 – 9/11/2020	9/11/2020	One-page C-3 report depicting contributions received from four individuals.	\$300.00	9/11/2020	0

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
9/16/2020	9/16/2020	One-page C-3 report depicting three itemized contributions received from three PACs.	\$2,300.00	9/16/2020	0
9/21/2020	9/21/2020	One-page C-3 report depicting five contributions from three individuals and two PACs.	\$1,800.00	9/21/2020	0
9/21/20 – 9/22/2020	9/24/2020	One-page C-3 report depicting five contributions from individuals ranging from \$25 to \$500.	\$700.00	9/24/2020	0
9/24/20 – 9/28/2020	9/29/2020	One-page C-3 report depicting contributions from two individuals and two entities.	\$2,550.00	9/29/2020	0
9/29/2020	10/02/2020	One contribution from a PAC.	\$1,000.00	9/12/2020	3
10/1/20 – 10/2/2020	10/2/2020	Two-page C-3 report depicting six contributions from two entities and four PACs ranging from \$500 to \$1,000.	\$4,500.00	10/2/2020	0
10/5/2020	10/8/2020	One-page C-3 report depicting four contributions from individuals ranging from \$50 to \$300.	\$700.00	10/8/2020	0
10/7/2020	10/7/2020	One-page C-3 report depicting three total contributions from one entity and two individuals ranging from \$25 to \$1,000.	\$1,050.00	10/7/2020	0
10/9/2020	10/9/2020	One-page C-3 report depicting a total of three contributions – two from individuals and one from an entity.	\$2,000.00	10/9/2020	0
10/13/2020	10/13/2020	One-page C-3 report depicting three total contributions from individuals ranging from \$25 to \$500.	1,050.00	10/13/2020	0
10/14/20 – 10/15/20	10/15/2020	Four-page C-3 report depicting five total contributions from three entities/PAC and two individuals ranging from \$150 to \$1,000.	\$2,650.00	10/15/2020	0
10/18/20 – 10/19/20	10/21/2020	One-page C-3 report depicting two total contributions – one from an individual and one from a PAC.	\$1,025.00	10/21/2020	0
10/19/2020	10/19/2020	One-page C-3 report depicting one contribution from an entity.	\$1,000.00	10/20/2020	0

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
10/21/2020	10/26/2020	One-page C-3 report depicting four total contributions from three entities/PACs and one individual ranging from \$500 to \$1,000.	\$3,600.00	10/26/2020	0
10/22/20 – 10/23/20	10/23/2020	One-page C-3 report depicting three total contributions from two PACs and one entity.	\$3,250.00	10/23/2020	0
10/27/20 – 10/30/20	10/30/2020	One-page C-3 report depicting a total of four contributions received. Two from individuals and the remaining two from a PAC and entity, including a \$600 in anonymous contribution(s) received.	\$1,150.00	10/30/2020	0
11/1/2020	11/04/2020	One contribution from an individual.	\$100.00	11/04/2020	0
11/07/2020	11/10/2020	Two total contributions from two individuals.	\$100.00	11/11/2020	0
12/06/2020	12/07/2020	One contribution from a PAC.	\$1,000.00	12/08/2020	0
Totals			\$69,075.00		

- PDC staff reviewed the 34 C-3 reports filed by the Campaign and listed in the table above totaling \$69,075.00 which represented about 59.7 percent of the \$115,660.61 in total contributions received during the 2020 election cycle. As noted in the table above, the Campaign timely filed all 33 out of the 34 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 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 2018 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 bona fide party committees listed above).
- Staff’s review also indicated the Campaign disclosed the required Employer and Occupation information for the 146 individuals who contributed more than \$100 to the Campaign, totaling \$40,227.00 in contributions received.
- Of the 146 individuals who disclosed their Employer and Occupation information, 49 listed their Occupation as being “Retired.” Those 49 retirees contributed a total of \$16,552.00 to the 2020 Campaign.

- The PDC audit procedures include staff identifying contributors that made monetary contributions to the Campaign and then verifying or confirming information disclosed for those specific contributions. For this audit, staff verified or confirmed selected contributions received by the Campaign by reviewing the expenditure reports of continuing political action committees (PAC) that were registered and required to file C-3 and C-4 reports with the PDC in the 2020 election year and made contributions to the Campaign in 2020.
- 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'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 Political Action Committee (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
5/12/2020	Puget Sound Chapter-NECA PAC	\$1,000	5/14/2020	5/4/2020	C-4 report
7/14/2020	Washington Beverage Association	\$1,000	7/15/2020	6/9/2020	C-4 report
7/22/2020	Washington Potato PAC	\$1,000	7/22/2020	7/14/2020	C-4 report
8/10/2020	STRAT-PAC	\$1,000	8/11/2020	8/6/2020	C-4 report
10/19/2020	Hospitals for a Healthy Future PAC	\$1000	10/21/2020	9/17/2020	C-4 report
9/29/2020	Trucking Action Committee	\$1,000	10/02/2020	6/29/2020	C-3 report
10/22/2020	Association of Washington Business	\$1,000	10/23/2020	9/30/2020	C-4 report
10/22/2020	Clark County Republicans	\$1,000	10/23/2020	10/19/2020	C-4 report
10/24/2020	Developing a Robust Eco. For WA	\$1,000	10/26/2020	10/21/2020	C-4 report
9/24/2020	Retail Action Council	\$1,000	9/29/2020	9/21/2020	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 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, and 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 election year, 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
May 2020 C-4 report	6/10/2020	6/01/2020 Amended report. Initial report filed timely.	\$2,788.68	\$890.83	\$527 for Candidate Filing Fee; \$137.50 to US Postal Service for Stamps, \$41.97 to Staples for Mailing Labels; and \$26.43 to Verizon Wireless for Campaign Telephone Line Charge.	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2020 21-Day Pre Primary C-4 report	7/14/2020	7/14/2020	\$28,860.00	\$2,336.82	\$500 to Eluxurate LLC for Video Shoot; \$340 to The Messenger for Advertising (July); \$780.22 to Go Daddy for Web Security; \$129.95 to Dropbox for Cloud Service; \$73.70 to Milwaukie Lumber for Stakes for Yard Signs; \$250 to Washington State Republicans for Voter Outreach; and \$52.86 to Verizon Wireless for Campaign Telephone Line Charge.	0
2020 7-Day Pre Primary C-4 report	7/28/2020	7/28/2020 Initial report filed timely.	\$5,160.00	\$17,146.29	12 separate expenditures totaling \$17,018.51 to Gateway Communications for Setup – Mailer 1 & 2, Design – Mailer 1 & 2, Voter Address List – Mailer 1 & 2, Production – Mailer 1 & 2, Postage – Mailer 1& 2 and Delivery to Post Office.	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2020 Post-Primary C-4 report	9/10/2020	9/01/2020	\$13,124.00	\$9,807.12	Six separate expenditures totaling \$8,473.92 made to Gateway Communications for Setup – Mailer 3, Design – Mailer 3, Voter Address List – Mailer 3, Production – Mailer 3, Delivery – Mailer 3 and Postage – Mailer 3; \$184 to US Postal Service for Stamps; \$813 to The Reflector for Advertising; \$38.24 to Office Depot for Labels and Envelopes; and \$27.14 to Verizon Wireless for Telephone Lines.	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2020 21-Day Pre-General C-4 Report	10/13/2020	10/13/2020 Initial/original report filed timely.	\$22,435.00	\$8,966.36	Six expenditures made to Gateway Communications, totaling \$8,278.92 for Setup – General Mailer 1, Design – General Mailer 1, Production – General Mailer 1, Extras – General Mailer 1, Delivery – General Mailer 1 and Postage – General Mailer 1; \$340 to City of Vancouver for Advertising – Senior Messenger; and \$47.72 to Verizon Wireless for Campaign Telephone Line Charge.	0

2020 7-Day Pre-General C-4 report	10/27/2020	10/27/2020	\$17,910.00	\$56,808.04	Ten expenditures made to Gateway Communications (\$20,406.25) for Setup – General Mailer 2, Design – General Mailer 2, Production – General Mailer 2, Delivery – General Mailer 2, Postage – General Mailer 2, Setup – General Mailer – 3, Voter File – General Mailer 3 and Production – General Mailer 3; \$30,000 to Alpha Media for two Digital Advertising; \$1,000 to Eluxurate LLC for Video Shoot and Facebook Live Event; and \$44.34 to Lowes for Wood Stakes for Yard Signs.	0
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C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2020 Post General election C-4 report	12/10/2020	12/4/2020	\$1,398.90	\$11,047.07	Six expenditures made to Gateway Communications (\$6,760.81) for Setup – General Mailer 4, Design – General Mailer 4, Production – General Mailer 4, Delivery – General Mailer 4 and Postage – General Mailer 4 and Printing Slim Jims; \$1,097 to The Reflector for Advertising; \$1,000 to Paul Kraft for Treasurer Fees; \$844.33 to Safeway for Gas Cards for Volunteers; \$500 to Jesse Jimenez for Social Media Consulting and Administration; and \$141.65 to Office Depot for Office Supplies for Curing Ballots.	0

- The Campaign did not disclose any orders placed, debts or obligations on the six C-4 reports filed during the accelerated period in the 2020 election cycle.
- 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 2020 election cycle. The vendors receiving the largest Campaign expenditures during the 2020 election included the following:
 1. The Campaign made 40 expenditures to Gateway Communications, Inc., totaling \$60,938.41 for expenditures that included services for cable, online and digital advertising, broadcast and web media, radio and newspaper advertising, and printing mail pieces and door belling, graphic design work and campaign consulting as detailed below:
 - 12 expenditures totaling \$17,018.51 for Mailer 1 Production, Printing, Postage and Delivery.
 - Six expenditures totaling \$8,473.92 for Mailer 3 Production, Printing, Postage and Delivery.
 - Six expenditures totaling \$8,278.92 for Setup – General Mailer 1, Design, Production and Extras.
 - Ten expenditures totaling \$20,406.25 for Setup – General Mailer 2, Production and Delivery and Setup – General Mailer 3.
 - Six expenditures totaling \$6,760.81 for Setup – General Mailer 4, Delivery, Postage and Printing Slim Jims.

2. The Campaign made two expenditures to Alpha Media totaling \$30,000 for Digital Advertising for the period beginning 10/14/2020 to 10/23/2020.
- As part of the audit, PDC staff requested the Campaign to provide copies of the books of account maintained for five expenditures listed below that were made by the 2020 Campaign including supporting documentation such as invoices, receipts, cancelled checks, notes, emails and any other pertinent materials.
 - On April 20, 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. 40 expenditures were made by the Campaign to Gateway Communications totaling \$60,000 during the 2020 election, that included the following expenditures:
 - A \$8,278.92 expenditure (six expenditures in total) made on October 12, 2020 for “General Mailer 1.”
 - The documentation provided by the Campaign included a copy of a \$8,278.92 check (#387) dated 10/12/2020, and written payable to *Gateway Communications, Inc.*, for invoice number 21601(dated 10/8/2020) for “SETUP – List preparation, cass certification, and computer set up, DESIGN – ½ hours @ \$92/hr, PRINTING – POSTCARD: 6X11, 4/4 ON 100# Dull Cover, INKJET – Personalize mailer, sort, tray and strap, Production Total, Extras, Delivery – Deliver to Post Office and Postage.”
 - A \$7,978.92 expenditure (five expenditures in total) made on October 15, 2020 for “General Mailer 2.”
 - The documentation provided by the Campaign included a copy of a \$7,978.92 check (#389) dated 10/15/2020, and written payable to *Gateway Communications, Inc.*, for invoice number 21649 (dated 10/14/2020) for “SETUP – List preparation, cass certification, and computer set up, DESIGN – ½ hours @ \$92/hr, PRINTING – POSTCARD: 6X11, 4/4 ON 100# Dull Cover, INKJET – Personalize mailer, sort, tray and strap, Production Total, Extras, Delivery – Deliver to Post Office and Postage.”
 - A \$12,427.33 expenditure (five expenditures in total) made on October 23, 2020 for “General Mailer 3.”
 - The documentation provided by the Campaign included a copy of a \$12,427.33 check (#392) dated 10/23/2020, and written payable to *Gateway Communications, Inc.*, for invoice number 21670 (dated

10/21/2020) for “SETUP – List preparation, cass certification, and computer set up, VOTER FILE, PRINTING – POSTCARD; 6X11, 4/4 ON 100# Dull Cover, INKJET – Personalize mailer, sort, tray, and strap, PRODUCTION TOTAL, DELIVERY – Deliver to Post Office and Postage.”

- A \$6,311.09 expenditure (five expenditures in total) made on October 30, 2020 for “General Mailer 4.”
 - The documentation provided by the Campaign included a copy of a \$6,311.09 check (#394) dated 10/30/2020, and written payable to *Gateway Communications, Inc.*, for invoice number 21720 (dated 10/8/2020) for “SETUP – List preparation, cass certification, and computer set up, DESIGN – ½ hours @ \$92/hr, PRINTING – POSTCARD: 6X11, 4/4 on 100# Dull Cover, INKJET – Personalize mailer, sort, tray and strap, Production Total, Delivery – Deliver to Post Office and Postage.”
- 2. Two expenditures totaling \$30,000 made to Alpha Media for “Digital Advertising” that included a \$25,000 expenditure made on October 14, 2020; and a \$5,000 expenditure made on October 23, 2020. Staff noted there appeared to have been a \$1,066.15 refund or rebate made from Alpha Media on January 15, 2021.
 - The documentation provided by the Campaign included a copy of a \$25,000 check (#388) dated 10/14/2020 written payable to *Alpha Media* for “Digital Advertising” on YouTube (10,000 Impressions), Connected TV (25,000 Impressions) and Mobile 2 Social (1,119,444 Impressions, and a second check for \$5,000 (check# 393) and written payable to *Alpha Media* for “Digital Advertising.”
- 3. Two expenditures made to The Reflector totaling \$1,910 for newspaper for “Advertising” that included a \$1,097 expenditure on November 10, 2020; and a \$813 expenditure made on August 17, 2020.
 - The documentation provided by the Campaign included a copy of a \$1,097 check (#397) written on 10/10/2020 payable to *The Reflector* for “BGR BGR – Contract dated October 21 and October 28, 2020 for 3 x 11.50.” A copy of a second check for \$813 (check# 375) for invoice number 29121510 was also provided by the Campaign.
- 4. Two expenditures made to Eluxurate LLC totaling \$1,500 for “Video Shoot” and a “Video Shoot and Facebook Live Event” that included a \$1,000 expenditure made on October 15, 2020; and a \$500 expenditure made on June 12, 2020.
 - The documentation provided by the Campaign included a copy of: (a) \$1,000 check (#390) that was paid to *Eluxurate* on 10/14/2020 for “Video Production Services;” and (b) \$500 check (#368) that was paid to *Eluxurate* on 6/12/2020 for “Video Production.”

5. Two expenditures made to the City of Vancouver totaling \$680 for “Advertising – Senior Messenger” that included a \$340 expenditure on October 6, 2020; and a \$340 expenditure made on January 15, 2021.
 - The documentation provided by the Campaign included a copy of: (a) \$340 check (#379) that was paid to the *City of Vancouver on 10/6/2020* for “Advertising – Senior Messenger;” and (b) a second \$340 check (#405) that was paid to the *City of Vancouver on 1/15/2021* for “Advertising.”

Books of Account, Maintaining Campaign Records, and Internal Control Process:

As part of the audit, PDC staff requested each campaign to provide information concerning general campaign practices such as internal compliance controls, procedures for processing, depositing, recording and disclosure of contribution, procedures for making and reporting expenditures, including for debts, obligations, and orders placed, in-kind contributions, and candidate loans. On March 24, 2021, the Campaign provided a response to staff’s questions about the internal control processes.

Audit Exhibit #2

Campaign Contributions:

The Campaign stated that during the 2020 election, contributions were deemed received when retrieved from the mailbox by the treasurer or when the candidate (Vicki Kraft) received it from contributors. The treasurer would “make a note on the envelope when a contribution was received, as well as noting the address on the check for entering into ORCA.” The Campaign treasurer would then deposit the contributions, entered the information into ORCA and file the C-3 reports. The Campaign further stated: “Sometimes I would have to contact the contributors to get their employment address and occupation if the contribution exceeded \$100 for the election. Contributions were deposited usually several times during the week, taking into account the time limit to deposit a check received.”

The Campaign further stated that “Online Contributions were received through Anedot and the total contributions (not the net after charge) were reported on the C-3. The separate charges by Anedot were reported on the C-4. The Anedot contributions were deemed received when Anedot sent the notice to the Campaign treasurer indicating when the contributor had entered the contribution.”

Campaign Expenditures:

All orders for political advertisements were placed by the candidate herself. The candidate would receive the invoice(s) and forward them to the Campaign treasurer for payment. The Campaign further stated: “Something she (Vicki Kraft) would write a check herself when meeting with the vendor. She would then send a copy of the invoice to the treasurer for recordkeeping.” The Campaign treasurer would send checks as soon as what was owed became available or known and report the expense on the C-4 report.

Contribution and Expenditure Reports:

The Campaign's ORCA bookkeeping was done by the treasurer. This included uploading all the C-3 and C-4 reports onto ORCA. According to the Campaign, the "C-3 reports were filed usually the day of the deposit. The C-4 reports were filed usually within the first couple of days of the allowed filing period."

The treasurer maintained and kept notebook binders in chronological order, by C-4 period and Excel spreadsheets for contributions, expenses and the checkbook. Before sending the C-4s to the PDC, the Campaign treasurer would compare the checkbook balance, the reconciled bank account balance, and the ending balance number on the C-4 report(s) "to make sure all were equal before filing."

The treasurer, Mr. Kraft, was responsible for curating the campaign records. The campaign books "consisted of printing the C3 and C4 reports and putting them in a notebook binder in chronological order. The books of account were made available during the public inspection period, however no-one from the campaign including Mr. Kraft received any requests for public inspection.

The Campaign stated that the candidate and the treasurer "communicated regarding C-3 and C-4 reports if there was need to know the reason for an expense or sometimes a contributor's occupation and employer for contributions exceeding \$100." The candidate did not review reports before being filed with the PDC. several volunteers and Campaign staff were reimbursed for out-of-pocket expenses. 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 2020 Vicki Kraft State Representative Campaign covering the period February 1, through December 31, 2020.
- Email exchanges between PDC staff and Paul Kraft, on behalf of the Vicki Kraft 2020 State Representative Campaign.
- PDC staff queried the PDC Contribution and Expenditure database for the 2020 Vicki Kraft for State Representative Campaign contribution and expenditure information covering the period of February 1 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 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 July 2021.

Erick O. Agina
PDC Compliance Officer

Audit Exhibits

Audit Exhibit #1 Documents provided by the 2020 Vicki Kraft for State Representative Campaign to the PDC on April 30, 2021, concerning the expenditures selected for audit.

Audit Exhibit #2 Letter from the 2020 Vicki Kraft for State Representative Treasurer provided by the Campaign to the PDC on April 30, 2021, concerning the campaign practices and procedures.

April 30, 2021

RECEIVED

MAY 06 2021

Kurt Young, PDC Compliance Officer
Public Disclosure Office
711 Capitol Way, Rm. 206
P.O. Box 40908
Olympia, WA 98504-0908

PUBLIC DISCLOSURE COMMISSION

Subject: PDC Audit Letter, 2020 Vicki Kraft for State Representative Campaign; PDC Audit No. 20-12

Dear Mr. Young:

Please find enclosed a complete response to the request for documents and campaign practices for the Vicki Kraft campaign for the 2020 election.

Sincerely,



Paul Kraft, Treasurer



Vicki Kraft, State Representative candidate

PDC Audit No. 20-12 – Vicki Kraft for State Representative 2020 – Answers in bold provided by Paul Kraft, Treasurer

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

1. Staff noted that the Campaign made 40 expenditures to Gateway Communications during the 2020 Campaign totaling \$60,938.69, and is requesting campaign records and documentation for the following expenditures:

- The six expenditures made on October 12, 2020 totaling \$8,278.92 for “General Mailer 1.”
- The five expenditures made on October 15, 2020 totaling \$7,978.92 for “General Mailer 2.”
- The five expenditures made on October 23, 2020 totaling \$12,427.33 for “General Mailer 3.”
- The five expenditures made on October 30, 2020 totaling \$6,311.09 for “General Mailer 4.”

See attached invoices, cancelled checks and e-mails. Cancelled check for General Mailer 4 also included payment for a \$340 invoice for Slim Jims which is not part of your request.

2. Two expenditures totaling \$30,000 made to Alpha Media for “Digital Advertising” that included a \$25,000 expenditure made on October 14, 2020; and a \$5,000 expenditure was made on October 23, 2020. Staff noted their appeared to have been a \$1,066.15 refund or rebate made from Alpha Media on January 15, 2020¹, so please provide the documentation for that activity as well.

See attached cancelled checks, check stub for refund and e-mails.

3. Two expenditures made to The Reflector totaling \$1,910 for newspaper “Advertising” that included a \$1,097 expenditure on November 10, 2020; and a \$813 expenditure made on August 17, 2020.

See attached invoices, cancelled checks, e-mails and other documentation.

4. Two expenditures made to Eluxurate LLC totaling \$1,500 for a "Video Shoot" and a "Video Shoot and Facebook Live Event" that included a \$1,000 expenditure made on October 15, 2020; and a \$500 expenditure made on June 12, 2020.

See attached invoices, cancelled checks and e-mail.

5. Two expenditures made to the City of Vancouver totaling \$680 for "Advertising -Senior Messenger" that included a \$340 expenditure on October 6, 2020; and a \$340 expenditure made on January 15, 2021.

See attached invoices, cancelled checks, e-mails and other documentation.

Staff is also requesting that each Campaign provide a response concerning 2020 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 2020 Campaign contribution process from receipt of a contribution, to entering the contributor information into ORCA, the name of the person depositing the contributions, how often contributions were deposited, and the filing of the C-3 report. In addition, if online contributions were received by the Campaign, please explain how those contributions were processed as well.

A contribution was deemed received when I either took it out of the Post Office box or when Vicki received it from a contributor. I would make a note on the envelope when it was received, as well as noting the address on the check for entering into ORCA. I deposited the contributions, entered the information into ORCA and filed the C-3 reports. Sometimes I would have to contact the contributors to get their employer address and occupation if the contribution exceeded \$100 for the election. Contributions were deposited usually several times during the week, taking into account the time limits to deposit a check received. Online contributions were received through Aneidot and the total

contributions (not the net after charge) were reported on the C-3. The separate charges by Anedot were reported on the C-4. The Anedot contributions were deemed received when Anedot sent the notice to me indicating when the contributor had entered the contribution.

2. Explain the 2020 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.

Vicki would place the orders for political advertisements. When she received the invoice she would send it to me for payment. Sometimes she would write a check herself when she was meeting with the vendor. She would then send a copy of the invoice to me for recordkeeping. I promptly sent a check as soon as I knew what was owing and reported the expense in the C-4 period during which it was paid.

3. Describe the process for reviewing and filing the C-3 and C-4 reports, as well as the communication that occurs between the candidate and the Treasurer concerning the contribution and expenditure information being disclosed. In addition, does the candidate review the reports either before or after they have been filed?

C-3's were filed usually the day of the deposit. The C-4's were filed usually within the first couple days of the allowed filing period. I have Excel spreadsheets for contributions, expenses and the checkbook to help when it comes time to report the activity for the C-3 and C-4 periods. Before sending the C-4 to the PDC I would compare the checkbook balance, the reconciled bank account balance and the ending balance number showing on the C-4 to make sure all were equal before filing it. Vicki and I communicated regarding the C-3 and C-4 reports if I needed to know the reason for the expense or sometimes a contributor's occupation and employer for contributions exceeding \$100. Given my professional career as an income tax auditor for 30 years and background and experience in accounting, Vicki did not review the reports. However, she did review this audit response before sending to the PDC.

4. Describe how the Campaign records are maintained for all contribution and expenditure activities, and what those records include.

I keep notebook binders in chronological order, by C-4 period. In the front of that C-4 period you will first see the copy of the C-4, then the individual C-3's with any notes or letters sent with the contribution including, for non-individual contributors, the "foreign entity disclosure". For Anedot contributions, I will attach a copy of the notice sent to me from Anedot of the contribution. You will then see the receipts and invoices for the expenses for that C-4 period. The next C-4 period, etc. would then follow in the binder.

5. Who was responsible for the Campaign records, did the Campaign make the books of account available during the public inspection period, was an inspection requested, and what documents were made available during the inspection?


I was fully responsible for the campaign records. The campaign did make the records available during the public inspection period for review but no one asked to review them.

6. Did the candidate or any Campaign officers or volunteers received reimbursements during the 2020? If yes, please describe how the Campaign handled the reimbursements, the documentation that was required for reimbursement, and how those records were maintained.

Yes, sometimes a volunteer would incur an expense on behalf of the campaign. He or she would then be required to submit a receipt to myself or Vicki for the expense as well as a reason for the expense. I would then cut a check to reimburse them. Those receipts are with the other receipts and invoices that are in the binders.

Fw: General PC1

paulnkraft@yaho.../Inbox

 **Vicki Kraft** <vicki@vickikraft.com>
To: paulnkraft@yahoo.com <paulnkraft@yahoo.com>
Cc: Vicki Kraft <vicki@vickikraft.com>

Apr 28 at 5:04 PM

Paul -
The attached invoice is for General Mailer 1 from Gateway Communications.

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: dlana@gatewaycl.com <diana@gatewaycl.com>
Sent: Thursday, October 8, 2020 4:18 PM
To: Vicki Kraft <vicki@vickikraft.com>
Subject: General PC1

Vicki,

I have attached the invoice for the General #1 Postcard.

Let me know if you have any questions.

Thanks,

Diana



This email has been checked for viruses by AVG antivirus software.
www.avg.com

1 File 30.9kB



Friend to Elect Vicki Kraft (invoice).pdf
31kB



GATEWAY COMMUNICATIONS, INC.

16805 NE Mason Court | Portland, OR 97230
503-257-0100 | www.gatewayci.com

Invoice


Date	Invoice #
10/8/2020	21601

Bill To
Friends to Elect Vicki Kraft

Terms	Due Date
Due on receipt	10/8/2020

Description	Qty	Amount
VICKI KRAFT GENERAL #1		
- SETUP- List preparation, cass certification, and computer set up		60.00
- DESIGN - 1/2 hours @ \$92/hr		46.00
- PRINTING - POSTCARD: 6x11, 4/4 on 100# Dull Cover	23,278	
- INKJET - Personalize mailer, sort, tray, and strap	23,278	
- PRODUCTION TOTAL	23,278	3,538.26
- EXTRAS	3,000	300.00
- DELIVERY - Deliver to Post Office		24.00
- POSTAGE -	23,278	4,310.66


Total	\$8,278.92
Payments/Credits	\$0.00
Balance Due	\$8,278.92

 **FRIENDS TO ELECT VICKI KRAFT**
 2204 NE 158TH ST
 VANCOUVER, WA 98686

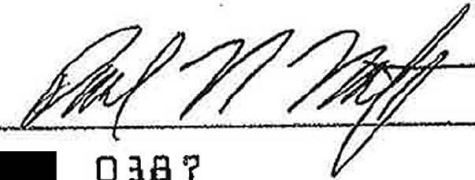
387
 98-505/1232
 50397

Date Oct. 12, 2020

Pay to the Order of Gateway Communications, Inc. \$ 8,278.92
Eight thousand two hundred seventy eight ⁹²/₁₀₀ Dollars

 **UMPQUA** 1-866-4UMPQUA
 B-A-N-K (1-866-486-7782)

For Invoice 21601


 0387

Account:4862882158 Serial:387 Amount:\$8,278.92 Sequence:23495920 TR:123205054 TranCode:0 Date:10/19/2020
 DepAccountNum:103035 Branch:0 Teller:0 XmitTC:0 Run:51 PocketNun:0 Batch:16 SiteNumber:0

BOTW 121100782
 202585000000240
 2020/10/16 16:20:22

Pay to the order of Bank of the West
 For Deposit Only 121100782
 0962 - Gateway Communications
 Acct#:

Fw: Invoice for #2

paulnkraft@yaho../Inbox

V Vicki Kraft <vicki@vickikraft.com>
To: paulnkraft@yahoo.com <paulnkraft@yahoo.com>
Cc: Vicki Kraft <vickikraft@gmail.com>

Apr 28 at 5:08 PM

Paul -
This is for General Mailer # 2 from Gateway Communications.

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: diana@gatewayci.com <diana@gatewayci.com>
Sent: Wednesday, October 14, 2020 5:27 PM
To: Vicki Kraft <vicki@vickikraft.com>
Subject: Invoice for #2

Vicki,

I have attached the invoice for #2

Thanks,

Diana



This email has been checked for viruses by AVG antivirus software.
www.avg.com

1 File 30.9kB



Vickie Kraft #2 (invoice).pdf
31kB



GATEWAY COMMUNICATIONS, INC.

16805 NE Mason Court | Portland, OR 97230
503-257-0100 | www.gatewayci.com


Invoice

Date	Invoice #
10/14/2020	21649

Bill To
Friends to Elect Vicki Kraft


Terms	Due Date
Due on receipt	10/14/2020


Description	Qty	Amount
VICKI KRAFT GENERAL #2		
- SETUP- List preparation, cass certification, and computer set up		60.00
- DESIGN - 1/2 hours @ \$92/hr		46.00
- PRINTING - POSTCARD: 6x11, 4/4 on 100# Dull Cover	23,278	
- INKJET - Personalize mailer, sort, tray, and strap	23,278	
- PRODUCTION TOTAL	23,278	3,538.26
- DELIVERY - Deliver to Post Office		24.00
- POSTAGE -	23,278	4,310.66
Total		\$7,978.92
Payments/Credits		\$0.00
Balance Due		\$7,978.92

 **FRIENDS TO ELECT VICKI KRAFT**
 2204 NE 158TH ST
 VANCOUVER, WA 98686


389
 96-503/1232
 50397
 CHECK ARMOR
 PHOTO DEPOSIT

Date Oct. 15, 2020

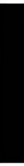
Pay to the Order of Gateway Communications, Inc. \$ 7,978.92
Seven thousand nine hundred seventy eight + ⁹²/₁₀₀ Dollars 

 UMPQUA B-A-N-K 1-866-4UMPQUA (1-866-486-7782)

For Invoice #21649


 0389

Account:4862882158 Serial:389 Amount:\$7,978.92 Sequence:25274170 TR:123205054 TranCode:0 Date:10/21/2020
 DepAccoutNum:103035 Branch:0 Teller:0 XmitTC:0 Run:3 PocketNun:0 Batch:17 SiteNumber:0

Pay to the order of Bank of the West
 For Deposit Only 121100782
 0962 - Gateway Communications
 Acct#: 

BOTW 121100782
 202585000000370
 2020/10/20 17:14:24

Fw: Invoice for PC 3

paulnkraft@yaho.../Inbox

V Vicki Kraft <vicki@vickikraft.com>
To: paulnkraft@yahoo.com <paulnkraft@yahoo.com>
Cc: Vicki Kraft <vicki@vickikraft.com>

Apr 28 at 5:10 PM

Paul -
This is for General Mailer # 3 from Gateway Communications.

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Vicki Kraft <vicki@vickikraft.com>
Sent: Friday, October 23, 2020 10:26 AM
To: paul kraft <paulnkraft@yahoo.com>
Subject: Fw: Invoice for PC 3

Paul,
Please pay the attached invoice for General Mailer # 3.

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: diana@gatewayci.com <diana@gatewayci.com>
Sent: Thursday, October 22, 2020 3:13 PM
To: Vicki Kraft <vicki@vickikraft.com>
Subject: RE: Invoice for PC 3

Yep...no problem, I have attached the updated invoice

From: Vicki Kraft <vicki@vickikraft.com>
Sent: Thursday, October 22, 2020 1:45 PM
To: diana@gatewayci.com
Subject: Re: Invoice for PC 3

Diana -
Would you update the invoice with the actual qty. printed / related for postage?

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: diana@gatewayci.com <diana@gatewayci.com>
Sent: Wednesday, October 21, 2020 4:11 PM
To: Vicki Kraft <vicki@vickikraft.com>
Subject: Invoice for PC 3

Vicki,

I have attached the Invoice for the #3 PC Mailing.

Thanks,

Diana



This email has been checked for viruses by AVG antivirus software.
www.avg.com

1 File 30.9kB



Vicki Kraft #3 .pdf
31kB



GATEWAY COMMUNICATIONS, INC.

16805 NE Mason Court | Portland, OR 97230
503-257-0100 | www.gatewayci.com

Invoice


Date	Invoice #
10/21/2020	21670

Bill To
Friends to Elect Vicki Kraft


Terms	Due Date
Due on receipt	10/21/2020


Description	Qty	Amount
VICKI KRAFT GENERAL #3		
- SETUP- List preparation, cass certification, and computer set up		120.00
- VOTER FILE		479.54
- PRINTING - POSTCARD: 6x11, 4/4 on 100# Dull Cover	36,228	
- INKJET - Personalize mailer, sort, tray, and strap	36,228	
- PRODUCTION TOTAL	36,228	5,180.60
- DELIVERY - Deliver to Post Office		24.00
- POSTAGE -	36,228	6,623.19


Total	\$12,427.33
Payments/Credits	\$0.00
Balance Due	\$12,427.33

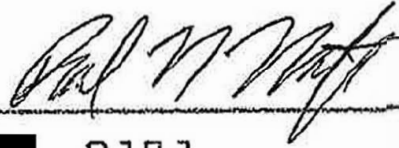
 **FRIENDS TO ELECT VICKI KRAFT**
 2204 NE 158TH ST
 VANCOUVER, WA 98686

392
 98-505/1232
 50397

Date Oct. 23, 2020 

Pay to the Order of Gateway Communications \$ 12,427.33
Twelve thousand four hundred twenty seven & 33/100 Dollars 


 **UMPQUA** 1-866-4UMPQUA
 B · A · N · K (1-866-486-7782)

For Invoice # 21670 

0392

Account:4862882158 Serial:392 Amount:\$12,427.33 Sequence:29285420 TR:123205054 TranCode:0 Date:10/28/2020
 DepAccountNum:103035 Branch:0 Teller:0 XmitTC:0 Run:3 PocketNun:0 Batch:3 SiteNumber:0

BOTW 121100782
 202585000000630
 2020/10/27 17:10:25

Pay to the order of Bank of the West
 For Deposit Only 121100782
 0962 - Gateway Communications
 Acct#: 

Fw: Invoice

paulnkraft@yaho.../Inbox



Vicki Kraft <vicki@vickikraft.com>
To: paulnkraft@yahoo.com <paulnkraft@yahoo.com>
Cc: Vicki Kraft <vicki@vickikraft.com>

Apr 28 at 5:16 PM

Paul -
This is for General Maller # 4 from Gateway Communications.

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Vicki Kraft <vicki@vickikraft.com>
Sent: Thursday, October 29, 2020 6:09 PM
To: paulnkraft@yahoo.com <paulnkraft@yahoo.com>
Subject: Fw: Invoice

Paul,
Tried to send to you earlier this afternoon. Appreciate your help to pay.

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: diana@gatewayci.com <diana@gatewayci.com>
Sent: Tuesday, October 27, 2020 4:58 PM
To: Vicki Kraft <vicki@vickikraft.com>
Subject: Invoice

Vicki,
I have attached the invoice for the #4 mailing, and will send the other invoice for the handouts along with the postal docs tomorrow.

Thanks,
Diana



This email has been checked for viruses by AVG antivirus software.
www.avg.com

1 File 30.9kB



Vicki Kraft #4 (invoice).pdf
31kB



GATEWAY COMMUNICATIONS, INC.

16805 NE Mason Court | Portland, OR 97230
503-257-0100 | www.gatewayci.com

Invoice


Date	Invoice #
10/27/2020	21720

Bill To
Friends to Elect Vicki Kraft


Terms	Due Date
Due on receipt	10/27/2020

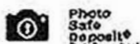
Description	Qty	Amount
VICKI KRAFT GENERAL #4		
- SETUP- List preparation, cass certification, and computer set up		60.00
- DESIGN - 1/2 hours @ \$92/hr		46.00
- PRINTING - POSTCARD: 6x11, 4/4 on 100# Dull Cover	16,180	
- INKJET - Personalize mailer, sort, tray, and strap	16,180	
- PRODUCTION TOTAL	16,180	3,074.20
- DELIVERY - Deliver to Post Office		24.00
- POSTAGE -	16,180	3,106.89


Total	\$6,311.09
Payments/Credits	\$0.00
Balance Due	\$6,311.09

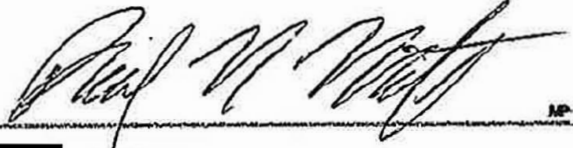
 **FRIENDS TO ELECT VICKI KRAFT**
 2204 NE 158TH ST
 VANCOUVER, WA 98686

394
 96505/1232
 50397

Date Oct. 30, 2020 

Pay to the Order of Gateway Communications \$ 6,761.09
Six thousand seven hundred sixty one & 09/100 Dollars 


 UMPQUA 1-866-4UMPQUA
 B.A.N.K (1-866-486-7782)

For Invoices #21720 + 21734 

0394

Account:4862882158 Serial:394 Amount:\$6,761.09 Sequence:32668090 TR:123205054 TranCode:0 Date:11/03/2020
 DepAccountNum:103035 Branch:0 Teller:0 XmitTC:0 Run:4 PocketNun:0 Batch:25 SiteNumber:0

BOTW 121100782
 202585000000900
 2020/11/02 16:39:52

Pay to the order of Bank of the West
 For Deposit Only 121100782
 0962 - Gateway Communications
 Acct#: 

THE INVESTMENT



Service	Est. Impressions	
Mobile 2 Social	1,119,444	
Connected TV	25,000	
YouTube	10,000	
25 :60 radio commercials on Lars Larson Show	362,000	10/14/20 UCK
Total Impressions	1,516,444	

Total Investment


~~\$30,000~~ → \$25,000 UCK

Audit Exhibit 1
Page 19 of 62



ALPHAMEDIA
ON-AIR . ONLINE . ON-SITE


10/14/20 - Check # 388 for \$25,000 for digital adv. above (not Lars Larson) received by Torden Wall.
Signed: [Signature] Signed: Vicki Kraft

 **FRIENDS TO ELECT VICKI KRAFT**
 2204 NE 168TH ST
 VANCOUVER, WA 98686

388
 95-505/1232
 50397

Date Oct. 14, 2020

Pay to the Order of Alpha Media \$ 25,000.00
Twenty five thousand & 00/100 Dollars

 **UMPQUA**
 B.A.N.K. 1-866-4UMPQUA
 (1-866-486-7782)

For Digital advertising



 0388

Photo Safe Deposit Bank on back

Account:4862882158 Serial:388 Amount:\$25,000.00 Sequence:21775090 TR:123205054 TranCode:0 Date:10/15/2020
 DepAccountNum:103205 Branch:0 Teller:0 XmitTC:0 Run:9 PocketNun:0 Batch:2 SiteNumber:0

10142020 0388

10910000224 10142020
 E 2536 ID 453 PKT 61
 4271995429

ENDORSE HERE

CREDIT TO THE ACCOUNT OF
 THE WITHIN NAMED PAYEE
 U.S. BANK
 BURLINGAME OFFICE

CHECK AND OR
 POSTAL DEPOSIT


NOT WRITE, STAMP OR SIGN BELOW THIS LINE
 UNLESS HELD BY FINANCIAL INSTITUTION

Security Features: special inks, standards and...
 on bank...
 • Monitor for...
 • The Security...
 • Micro...
 • The words...
 • Photo Safe...
 Do not open if...
 • Any of the...
 • Fugitive...
 • Brown...

Audit Exhibit 1
 Page 20 of 62

Fw: Pick up and deposit of check for Friends to elect Vicki Kraft campaign advertising

paulnkraft@yaho.../Inbox

 Vicki Kraft <vicki@vickikraft.com>
To: paulnkraft@yahoo.com <paulnkraft@yahoo.com>
Cc: Vicki Kraft <vicki@vickikraft.com>

Apr 28 at 8:35 PM

Paul -
See below for Alpha Media.

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Torden Wall <torden.wall@alphamediausa.com>
Sent: Thursday, October 15, 2020 7:57 AM
To: Vicki Kraft <vicki@vickikraft.com>
Subject: Re: Pick up and deposit of check for Friends to elect Vicki Kraft campaign advertising

Will do. good thought.

On Wed, Oct 14, 2020 at 11:04 PM Vicki Kraft <vicki@vickikraft.com> wrote:

Torden,
Quick suggestion. Moving forward you may want to cover the account number portion on front of a check if possible before you email it. That way when traveling across the internet hopefully just a bit more private / secure.

I suppose most have pretty strong encryption / security but just to be sure.

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Torden Wall <torden.wall@alphamediausa.com>
Sent: Wednesday, October 14, 2020 5:01 PM
To: Ashley Engmark <ashley.engmark@alphamediausa.com>; Shannon Maitland <shannon.maitland@alphamediausa.com>; Vicki Kraft <vicki@vickikraft.com>
Subject: Pick up and deposit of check for Friends to elect Vicki Kraft campaign advertising

Hi Shannon and Ashley- I just picked up and deposited into the alpha account the attached \$25k check for a digital advertising campaign for Friends to Elect Vicki Kraft. I'll have the order into our system tomorrow.

Torden

Fw: Pick up and deposit of chck for Friends to elect Vicki Kraft campaign advertising

paulnkraft@yaho.../Campaign

 **Vicki Kraft** <vicki@vickikraft.com>
To: paulnkraft@yahoo.com <paulnkraft@yahoo.com>

Oct 14, 2020 at 11:01 PM

Paul -

See attached and below for front / back copies of our chck to Alpha Media which they depositd. This is just for our records showing they recvd/ depositd.

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Torden Wall <torden.wall@alphamedlausa.com>

Sent: Wednesday, October 14, 2020 5:01 PM

To: Ashley Engmark <ashley.engmark@alphamedlausa.com>; Shannon Maitland <shannon.maitland@alphamedlausa.com>; Vicki Kraft <vicki@vickikraft.com>

Subject: Pick up and deposit of check for Friends to elect Vicki Kraft campaign advertising

Hi Shannon and Ashley- I just picked up and deposited into the alpha account the attached \$25k check for a digital advertising campaign for Friends to Elect Vicki Kraft. I'll have the order into our system tomorrow.

Torden



FRIENDS TO ELECT VICKI KRAFT
2204 NE 158TH ST
VANCOUVER, WA 98686

388
96-505/1232
50397

Oct. 14, 2020
Date



Pay to the Order of Alpha Media \$ 25,000.00

Twenty five thousand & 00/100 Dollars



UMPQUA
B · A · N · K

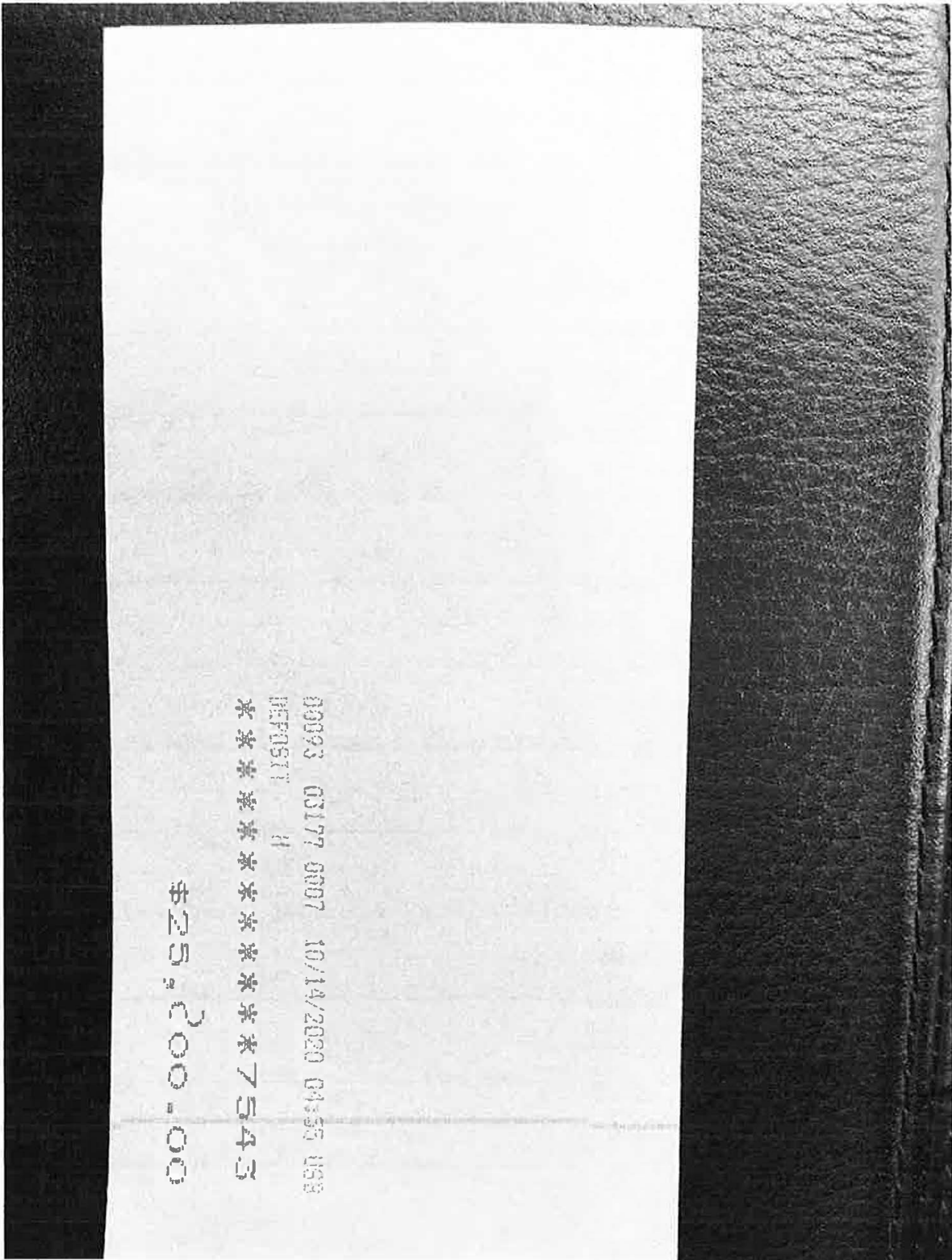
1-866-4UMPQUA
(1-866-486-7782)

For Digital advertising

MP



0388



00093 03177 8807 10/14/2020 04:56 US\$
DEPOSIT 4
*****7543
#25,200.00

Torden Wall- Regional Sales Manager
Alpha Media Portland: KINK KBFF KUPL KWEE KXL KXTG KUFO
Oregon Radio NW Network
1211 SW 5th Ave. 6th Floor Portland OR 97204
Office: 503.517-6081 Cell: 503.332.7867
torden.wall@alphamediausa.com

1 File 6MB

 Inkedimage_Alpha Media 2020 pymt_67367425_L1.jpg
6MB

VK revised impressions sheet for new total \$

Torden Wall <torden.wall@alphamediausa.com>

Fri 10/23/2020 1:37 PM

To: Torden.Wall@AlphaBroadC <torden.wall@alphamediausa.com>; Vicki Kraft <vicki@vickikraft.com>

 1 attachments (751 KB)

Vicki Kraft- Revised budget sheet 10-23-20.pptx;

Hi Vicki- attached is the revised Budget sheet for us both to sign when I pick up the check. It is reflecting the additional \$9000 revising impressions totals. see you at 2:30


Torden

Torden Wall- Regional Sales Manager
Alpha Media Portland: KINK KBFF KUPL KWEE KXL KXTG KUFO
Oregon Radio NW Network
1211 SW 5th Ave. 6th Floor Portland OR 97204
Office: 503.517-6081 Cell: 503.332.7867
torden.wall@alphamediausa.com

Audit Exhibit 1
Page 25 of 62

Mobile (residential Addresses)	1,119,444
Desktop- Registered Republican Voters	790,000
Connected TV	40,000
Total Impressions	1,949,444
Total Investment	\$34,000




 **FRIENDS TO ELECT VICKI KRAFT**
 2204 NE 158TH ST
 VANCOUVER, WA 98686

393
 96 505 1232
 50397
 CHECK ARMOR

Date Oct. 23, 2020

Pay to the Order of Alpha Media \$ 5,000.00
Five thousand and 00/100 Dollars

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

For Digital advertising

Paul M. Kraft

0393

Account:4862882158 Serial:393 Amount:\$5,000.00 Sequence:27148450 TR:123205054 TranCode:0 Date:10/26/2020
 DepAccountNum:103205 Branch:0 Teller:0 XmitTC:0 Run:2 PocketNum:0 Batch:4 SiteNumber:0

10910000224 10232026
 E 3267 ID 453 PKT 01
 3878902611

CREDITED TO THE ACCOUNT OF
 THE WITHIN NAMED PAYEE
 U.S. BANK
 BURLINGAME OFFICE
 PORTLAND, OR 97219

Audit Exhibit 1
 Page 27 of 62



UMPQUA BANK
 2515 NE 134TH ST, SUITE 100
 VANCOUVER WA 98686

US DEBIT
 A0000000980840
 CARD: XXXXXXXXXXXXX2526

DATE 01/15/21 TIME 12:28:50 TERM 597945

RECEIPT NUMBER 5406 5406
 CHECK DEPOSIT TO CHECKING
 ACCOUNT NUMBER ****2158

AUTHORIZED AMT: \$1,066.15

ACCT. BAL \$8,108.43
 AVAIL BAL \$7,267.28

CHECK DEPOSIT SUMMARY:
 Item 01 \$1,066.15
 Total Amount: \$1,066.15

ALPHA MEDIA, LLC
 PAYEE: Friends to Elect Vicki Kraft

CHECK NO: 527 92
 CHECK DATE: 12/17/2020

DATE	REF. NO.	DESCRIPTION	AMOUNT
11/24/2020	202011 Refund	Nov 20 Refund for under delivery-digital Impress ions	1,066.15

The Reflector

PRINTING & ADVERTISING

208 SE 1ST ST.
BATTLE GROUND, WA 98604
PHONE (360) 687-5151 FAX (360) 687-5162

ADVERTISING INVOICE/STATEMENT

Billing Period	Billed Account #
10/01/2020 - 10/31/2020	29121510

1416382

Billed Account
FRIENDS TO ELECT VICKI KRAFT ERIAN MINNICH PO BOX 821481 VANCOUVER WA 98682-0034

*Serving North Clark and
South Cowlitz counties for
over 100 years.*

Date	Ad.#	Charges or Credits Description/Product Code	SAU Dimenstions	Billed Units	Rate	Amount
		BALANCE FORWARD				\$0.00
21-Oct	608664	BGR BGR - CONTRACT	3 X 11.50	34.50	0.0000	\$548.50
28-Oct	608664	BGR BGR - CONTRACT	3 X 11.50	34.50	0.0000	\$548.50

Current	AGING			
	30 Days	60 Days	90 Days	Over 90 Days
\$1,097.00	\$0.00	\$0.00	\$0.00	\$0.00

Total Net Amount Due
\$1,097.00

Camp.
Office DEPOT
OfficeMax

VANCOUVER - (360) 573-9275

11/06/2020 8:00 PM

***** REPRINT *****

Reprint Transaction # 23091106200048260



DVTTTSAPPYUQ4ECE46

SALE 2309-4-8258-761444--20.10.2

167060 BW SS Letter

380 @ 0.15

Instant Savings

You Pay

356132 INK, HP902XL, BL

3838318 NameBadge Clip

Instant Savings

You Pay

330784 ENV,CLS,9X12,2

224744 RECYCLING PROG

10 @ .01

You Pay

Subtotal:

Sales Tax:

Total:

Debit Card 2526:

TDS Chip Read

RD 8000000980840 US DEBIT

TVR 8000048000

SVS PIN Verified

Member # 1790161721

The Reflector

PRINTING & ADVERTISING

208 SE 1ST ST.
 BATTLE GROUND, WA 98604
 PHONE (360) 687-5151 FAX (360) 687-5162

ADVERTISING INVOICE/STATEMENT

Billing Period	Billed Account #
07/01/2020 - 07/31/2020	29121510

Billed Account
FRIENDS TO ELECT VICKI KRAFT BRIAN MINNICH PO BOX 821481 VANCOUVER WA 98682-0034

1412206

Serving North Clark and South Cowlitz counties for over 100 years.

Date	Ad.#	Charges or Credits Description/Product Code	SAU Dimensions	Billed Units	Rate	Amount
		BALANCE FORWARD				\$0.00
22-Jul	607035	BGR BGR - CONTRACT	3 X 8.50	25.50	0.0000	\$406.50
29-Jul	607035	BGR BGR - CONTRACT	3 X 8.50	25.50	0.0000	\$406.50

Current	AGING				Total Net Amount Due
	30 Days	60 Days	90 Days	Over 90 Days	
\$813.00	\$0.00	\$0.00	\$0.00	\$0.00	\$813.00




ORCHARDS
 11909 NE 65TH ST
 VANCOUVER, WA 98682-5505
 (800) 275-8777

08/14/2020 12:55 PM

Product Qty Unit Price
 Box Renewal 1 5 \$74.00

Zip Code: 98682
 Box #: 821481
 Box Size: Size 2 - 5 in x 5.5 in
 Rental Period: Semi Annual
 Rental Start Date: 09/01/2020
 Next Renewal Date: 02/28/2021
 Customer Name: VICKI KRAFT

Total \$74.00
 Grand Total \$74.00
 Personal/Bus Check \$74.00


 **FRIENDS TO ELECT VICKI KRAFT**
 2204 NE 158TH ST
 VANCOUVER, WA 98686

375
 96-505/1232
 50397
 CHECK ARMOR

Date Aug. 17, 2020

Pay to the Order of The Reflector \$ 813.00
Eight hundred thirteen + 00/100 Dollars

Umpqua Bank 1-866-4UMPQUA (1-866-486-7782)
 F.A.N.K.

For Acct # 29121510 

0375

Account:4862882158 Serial:375 Amount:\$813.00 Sequence:81275110 TR:123205054 TranCode:0 Date:08/25/2020
 DepAccountNum:103205 Branch:0 Teller:0 XmitTC:0 Run:12 PocketNum:0 Batch:171 SiteNumber:0

0070014956

>125100607<
 Security State Bk 070
 2020-08-24
 0070014956
 Batch 237315545

Pay to the order of
 Security State Bank
 For Deposit Only
 Cash Printing Inc.
 THE REFLECTOR THE DEPOSIT
 0201523470
 SECURITY STATE BANK

political advertising

Brittney <brittney@thereflector.com>

Wed 10/7/2020 9:51 AM

To: Vicki Kraft <vicki@vickikraft.com>

 4 attachments (2 MB)

Reflector Ratecard 2020 5.pdf; Reflector Ratecard 2020 6.pdf; Reflector Ratecard 2020 7.pdf; Reflector Ratecard 2020 4.pdf;

The election is almost here, and what better way to spread the word then through the Reflector Newspaper. We deliver to 19,000 homes in north clark and south cowlitz county. We have 3 more papers before the elction 10/14, 10/21 and 10/28. WE are offering great color specials only \$50 extra for color vs \$150 for political ads. Also if you book an ad in all three papers we are offering a 15% discount. I am attaching some basic rate sheets, please get back to me if you have any questions.

Brittney Tracy

Area Sales Manager

360-723-5709

brittney@thereflector.com

Audit Exhibit 1

Page 33 of 62

Main Paper Display Ad Rates

DEADLINE WEDNESDAY, 11 AM

- Deadline for Corrections: All Sections • Thursdays, 3:00 pm
- Deadlines may change due to holiday schedules or special sections.

Earned Rate (per col. inch) **\$16.50**

All Rates Are Net Rates (unless otherwise specified)

Camera Ready Ads

\$13.00 per column inch.

Ads provided camera-ready with no changes in copy.

Non-Profit Rate

\$12.00 per column inch.

Mechanical Specifications

→ The Reflector is a five column, broadsheet publication printed on 22-inch stock. Overall height is 20.43 inches.

Width	Inches
1 column	1.89
2 columns	3.91
3 columns	5.94
4 columns	7.96
5 columns	9.98

Display Ad Color Rates

One color is available at \$100.

Full color is available at \$150.

Single and full color ads may be placed on the same page. All color subject to press capacity. Color rates are net and non-commissionable.

Run 4 consecutive weeks and receive color for \$100/run. That's \$200 in savings.

Front Page Ads • A, B & C Sections

All rates are net and non-commissionable.

A Section: One advertising space is offered at the top left corner of the front page at \$285 per issue, (includes full color), reserved in advance. This space measures 4 inches wide by 1.75 inches tall.

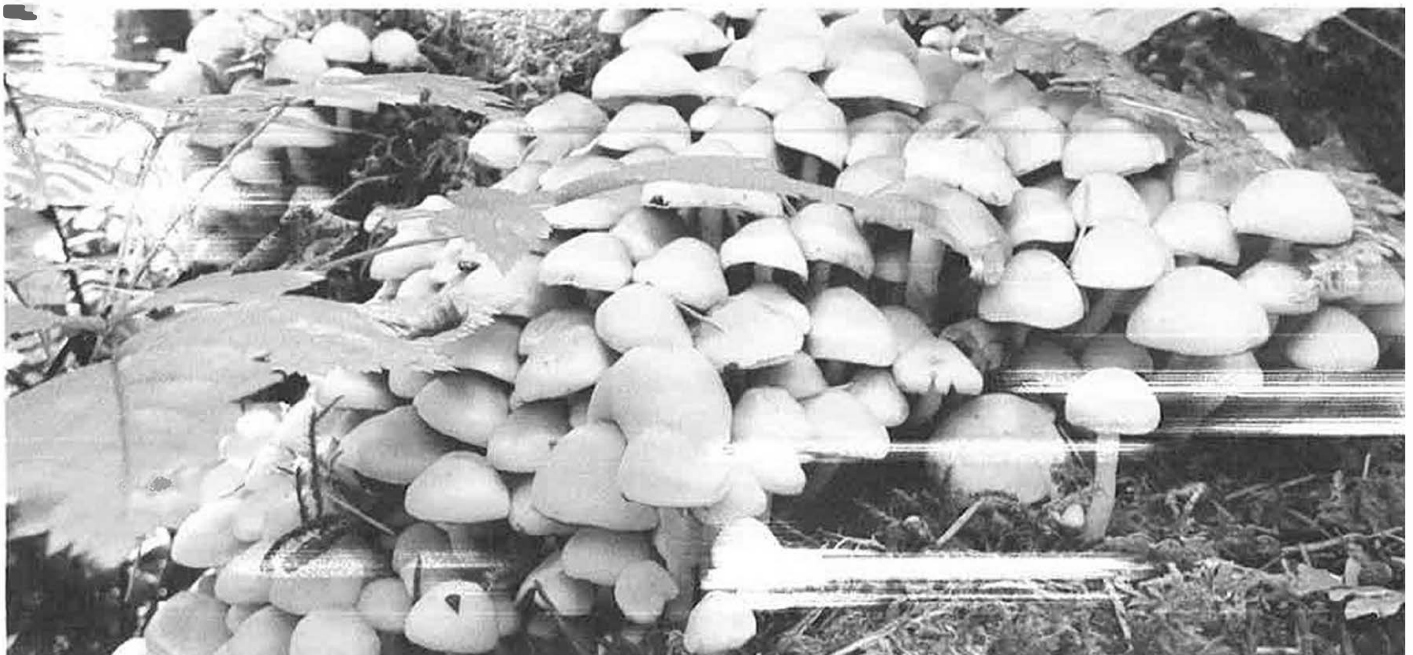
Two advertising spaces at the bottom of the front page are available weekly at \$265 each, (includes full color), reserved in advance. Each space measures 4.9 inches wide by 2 inches tall. Both spaces in one issue are priced at \$425 (9.98 inches wide by 2 inches tall, includes full color), reserved in advance.

B Section: One advertising space is offered at the top left corner of the front page, at \$165 per issue, (includes full color), reserved in advance. This space measures 5 inches wide by 1.75 inches tall.

C Section: One advertising space is offered at the top left corner of C1 at \$165 per issue, (includes full color), reserved in advance. This space measures 5 inches wide by 1.75 inches tall.

Packages

Advertising packages available. Let us help you customize a package. Contact your advertising sales representative for details.



The Reflector

Newspaper Since 1909

Main Paper Display Ad Rates

January 1, 2020 through December 31, 2020

Prices are based on one ad in one publication.

	EARNED RATE	CAMERA-READY RATE
Full Page <i>102.15 column inches, 5 column (9.98" wide x 20.43" tall)</i>	\$1,399.46	\$1,327.95
Half Page <i>51.25 column inches, 5 column (9.98" wide x 10.25" tall)</i>	\$748.25	\$666.25
Third Page <i>34.5 column inches, 3 column (5.94" wide x 11.5" tall)</i>	\$503.70	\$448.50
Quarter Page <i>25.5 column inches, 3 column (5.94" wide x 8.5" tall)</i>	\$390.15	\$331.15

Color

Single Spot Color • \$100

Full Color • \$150

A charge will be applied for late cancellations of ad space.

Brittney@TheReflector.com (360) 723-5709 • Cortina@TheReflector.com (360) 723-5706
Battle Ground, WA 98604 • www.TheReflector.com

Audit Exhibit 1
Page 35 of 62

Main Paper Ad Size/Cost Samples

January 1, 2020 through December 31, 2020

Prices are based on one ad in one publication.

1x2
(1.89" W x 2" H)

OPEN RATE
\$33.00

CAMERA-READY RATE
\$6

2x2
(3.91" W x 2" H)

OPEN RATE
\$66.00

CAMERA-READY RATE
\$52.00

Color
Single Spot Color • \$100
Full Color • \$150

1x3
(1.89" W x 3" H)

OPEN RATE
\$49.50

CAMERA-READY RATE
\$39

**Other
Ad Sizes
Available**

2x5
(3.91" W x 5" H)

OPEN RATE
\$165.00

CAMERA-READY RATE
\$130

3x3
(5.94" W x 3" H)

OPEN RATE
\$148.50

CAMERA-READY RATE
\$117

**Ask
About our
Packages!**

Audit Exhibit 1
Page 36 of 62

A charge will be applied for late cancellations of ad space.

The Reflector

GENERATE MORE LEADS WITH OUR

DIGITAL MARKETING

Digital marketing is the perfect opportunity to spread your business' visibility, gain customers, and create long-lasting relationships. Advertising your business with engaging and fine-tuned ads is the key to its success on social media.



The screenshot shows the newspaper's website layout with several ad spots highlighted in grey boxes:

- Leaderboard-Top1** 728x90
- Top Stories** section with a main article titled "Volcano naturalists lead hiking and kayak trips" and a grid of smaller article thumbnails.
- Center-Top1** 468x60
- Top News** section with articles like "Sales tax increase to go to BG voters" and "Brush Prairie honey producer introduces new flavors".
- Fixed-Top1** 300x250
- Fixed-Top2** 300x250
- Fixed-Top3** 300x125
- In-Story1** 300x250

Leaderboard-Top1 728 pixels x 90 pixels	\$175/month	\$75/week
Fixed-Top1 300 pixels x 250 pixels	\$175/month	\$50/week
Fixed-Top2 300 pixels x 250 pixels	\$150/month	\$50/week
Fixed-Top3 300 pixels x 125 pixels	\$125/month	\$50/week
Center-Top1 468 pixels x 60 pixels	\$125/month	\$50/week
In-Story1 300 pixels x 250 pixels	\$150/month	\$50/week

Please provide ads at 72 dpi resolution in RGB color mode.

Please provide us with a URL for your ad to link to. Ads can be in JPEG, Adobe Flash or video.

"Rose Colored Glass"

THE MAGENTA THEATER production of "Rose Colored Glass" will include performances June 12-21. The play is written by Lillian Hellman. It is directed by Michael Goussard. The play is set in 1941.

In-Story1
300x250

Their disparate worlds, separated by much more than the day between their lifetimes, are about to collide. PEG O'NEAL, the 13-year-old granddaughter of Lady, has given Catherine and her mother a new life. Catherine is a widow, but it is not until they become involved in the same cause that their friendship has a chance to bloom.

In a series of one-act plays, Peg (played by Lauren Sorel, making her Magenta Theater debut) now older, remembers the moving story of how Lady (played by Nichole Cover, last seen in Magenta's production of "Black Coffee") and (also played by K.C. Cooper, most recently seen in Magenta productions "Gardeners' Girls" and "Barefoot in the Park") formed a link from the "old American south" to an adolescent boy. Roger's nephew cut off contact before the war. This is the Magenta Theater Ensemble's debut for Brenda Wilson's, who most recently performed in "Gardeners' Girls" and "The Women of Lockport."

Performances will be held June 12-21 at Magenta Theater, 608 Main St., Vancouver. Tickets are on sale now! Call 514-518-7400. Purchase tickets at: www.MagentaTheatre.com/Events

CONTACT YOUR AD REP TODAY!

Brittney@TheReflector.com (360) 723-5709 • Cortina@TheReflector.com (360) 723-5706

Copy-Paste of ^{actual} email so can read
the text more easily larger print.

brittney@thereflector.com
advertising in The Reflector
Vicki Kraft
Wed 10/14/2020 2:33 PM
You're awesome - thank you!

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682
Brittney Tracy <brittney@thereflector.com>
Wed 10/14/2020 1:42 PM
Forward
Yes I have you on A2

Sent from my iPhone

On Oct 14, 2020, at 1:36 PM, Vicki Kraft <vicki@vickikraft.com> wrote:

Tracy -
Can I get guaranteed placement?

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682
Vicki Kraft
Wed 10/14/2020 1:35 PM

Tracy - Can I get guaranteed placement? Thanks, Vicki Vicki Kraft Candidate for State Representative 17th Legislative District, Position 1 (R) Phone: (360) 771-5201
www.VickiKraft.com Friends to Elect Vicki Kraft P.O. Box 821481 Vancouver, WA 98682

□

Brittney

Fri 6/26/2020 10:04 AM

Hello with the primary election in July I wanted to reach out and see if you wanted to do any advertising in our paper. I am attaching a rate sheet, we are giving color for \$75 vs 150 for political ads. please let me know if you have any questions we have our

Re: advertising in The Reflector

Brittney Tracy <brittney@thereflector.com>

Wed 10/14/2020 1:42 PM

To:

- Vicki Kraft <vicki@vickikraft.com>

Yes I have you on A2

Sent from my iPhone

On Oct 14, 2020, at 1:36 PM, Vicki Kraft <vicki@vickikraft.com> wrote:

Tracy -

Can I get guaranteed placement?

Thanks,

Vicki

Vicki Kraft

Candidate for State Representative

17th Legislative District, Position 1 (R)

Phone: (360) 771-5201

www.VickiKraft.com

Friends to Elect Vicki Kraft

P.O. Box 821481

Vancouver, WA 98682

From: Brittney Tracy <brittney@thereflector.com>

Sent: Wednesday, October 14, 2020 1:13 PM

To: Vicki Kraft <vicki@vickikraft.com>

Subject: Re: advertising in The Reflector

Thanks Vicki

Sent from my iPhone

On Oct 14, 2020, at 1:10 PM, Vicki Kraft <vicki@vickikraft.com> wrote:

Brittney,

Attached is the 1/3 page ad to run with guaranteed ad placement on pages A1, A2 or A3 in your upcoming papers 10/21 and 10/28. Same ad for both papers.

Please confirm the guaranteed ad placement is possible. If not I still want to run ad but hoping can get on one of those pages.

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Brittney <brittney@thereflector.com>
Sent: Tuesday, October 13, 2020 11:58 AM
To: Vicki Kraft <vicki@vickikraft.com>
Subject: Re: advertising in The Reflector

Ok no problem
Brittney Tracy
Area Sales Manager
360-723-5709

On Oct 13, 2020, at 11:57 AM, Vicki Kraft < > wrote:

Thanks Brittney. I'm checking with designer to see which size we'll need to go with for layout purposes. Will let you know once I hear back.

Know you need this by tomorrow am.

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Brittney < >
Sent: Tuesday, October 13, 2020 11:37 AM
To: Vicki Kraft < >
Subject: Re: advertising in The Reflector

did you decide on size? I wanted to get this booked, we don't need art till Thursday :)
Brittney Tracy
Area Sales Manager
360-723-5709

On Oct 9, 2020, at 3:33 PM, Vicki Kraft < > wrote:

Super, thanks Brittney!

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Brittney < >
Sent: Friday, October 9, 2020 3:31 PM
To: Vicki Kraft < >
Subject: Re: advertising in The Reflector

Hi Vicki- you too see below for prices and sizes if you change your mind.

1/4 5.97x8.5 \$381.50
1/3 5.97x11.5 \$498.50
1/2 9.98x10 \$700

Brittney Tracy
Area Sales Manager
360-723-5709

On Oct 9, 2020, at 3:27 PM, Vicki Kraft < > wrote:

Brittney,
Good talking with you just now on the phone. Per our conversation, for now go ahead and plan that I will do 1/4 page color ad in the 10/21 and 10/28 papers and you can plan to use the Primary 1/4 pg ad I used, at this point.

If I decide to use a new ad for 10/21 I'll be sure to get that to you by Thur., 10/15 at 5:00pm.

Thank you for your help.
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Brittney < >
Sent: Friday, October 2, 2020 1:49 PM
To: Vicki Kraft < >
Subject: Re: advertising in The Reflector

Hi Vicki-

I wanted to reach out and see if you wanted to advertise in October, we have a paper coming out on 10/14, 10/21, and 10/28 we can do quarter page ads like you've always done in the past. Let me know if you have any questions.

Brittney Tracy
Area Sales Manager
360-723-5709

On Jul 14, 2020, at 3:37 PM, Vicki Kraft < > wrote:

Super, thanks Brittney!
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Brittney Tracy < >
Sent: Tuesday, July 14, 2020 1:37 PM
To: Vicki Kraft < >
Subject: Re: advertising in The Reflector

Yes that's right. I'll get them scheduled

Sent from my iPhone

On Jul 14, 2020, at 1:12 PM, Vicki Kraft < > wrote:

Thanks much, Brittney! Just picked up the updated 1/4 page ad - ready for print in The Reflector. See attached.

My understanding per your email below on 7/7 at 11:23am is that the 1/4 page ad will cost \$406.50 per placement - correct?

I'd like to run this ad in your 7/22 and 7/29 papers. So total for these two placements will be \$813.00.

Please confirm above numbers are correct and that you received this and good to go.

Thanks for your help!
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Brittney < >
Sent: Tuesday, July 14, 2020 9:42 AM
To: Vicki Kraft < >
Subject: Re: advertising in The Reflector

Wanted to check in as we are working on our 7/22 paper. Deadline to reserve space is tomorrow. Please let me know if you want to reserve any space for 7/22 and 7/29.
Brittney Tracy
Area Sales Manager
360-723-5709

On Jul 7, 2020, at 1:17 PM, Vicki Kraft < > wrote:

Perfect, thanks Brittany. Back to you on this shortly.

Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Brittney < >
Sent: Tuesday, July 7, 2020 11:23 AM
To: Vicki Kraft < >
Subject: Re: advertising in The Reflector

quarter page ad is \$331.50 plus the \$75 for color. I don't know what you mean by 2 or 4 color but your ads were in full color. I am attaching a couple rate sheets so you have them for pricing.

Brittney Tracy
Area Sales Manager
360-723-5709

On Jul 7, 2020, at 11:17 AM, Vicki Kraft < > wrote:

Thanks so much, Brittany.

Would you provide a breakdown of the 1/4 pg ad with color pricing? E.g. price of the ad, plus \$75 per color price. Also please send for your next size smaller ad.

The ads you sent me, would those be considered 2 or 4 color?

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Brittney < >
Sent: Tuesday, July 7, 2020 10:42 AM
To: Vicki Kraft < >
Subject: Re: advertising in The Reflector

We don't run our paper on the weekends we are a weekly that comes out on Wednesdays so I would recommend 7/22 and 7/29 papers for those dates. the color charge will be 75 vs 150 but the ad price would still be on top of that color charge. You had done quarter page ads in the past the cost for this with the half off color price would be \$406.50 an ad. Let me know deadline to reserve space for the 7/22 paper would be next Tuesday and art would be due on Thursday.

Brittney Tracy
Area Sales Manager
360-723-5709

On Jul 7, 2020, at 10:33 AM, Vicki Kraft < > wrote:

Thanks much, Brittney. I'll look to have tweaks made to the ad and have back to you shortly. I want to run especially on July 25 and Aug. 1 weekends.

When do you need the print-ready ad in order to have in the paper for those weekends?

My understanding is this will be \$75 per ad placement - for 4 color ad. Please confirm.

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative

17th Legislative District, Position 1 (R)
Phone: (360) 771-5201

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Brittney < >
Sent: Friday, July 3, 2020 9:53 AM
To: Vicki Kraft < >
Subject: Re: advertising in The Reflector

Hi Vicki I am attaching the two ads you ran in July 2018. Let me know if you have any further questions.

Brittney Tracy
Area Sales Manager
360-723-5709

On Jul 2, 2020, at 10:28 PM, Vicki Kraft < > wrote:

Thanks so much, Brittney. I'll be back to you on this shortly.

Curious, do you have my 2018 ads from the primary election timeframe (July 2018) on file if I decide to have you run those again?

Thanks,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Brittney < >
Sent: Friday, June 26, 2020 9:58 AM
To: Vicki Kraft < >
Subject: advertising in The Reflector

Hello with the primary election in July I wanted to reach out and see if you wanted to do any advertising in our paper. I am attaching a rate sheet, we are giving color for \$75 vs 150 for political ads. please let me know if you have any questions we have our 7/8 7/15 and 7/22 paper before the election.

Brittney Tracy
Area Sales Manager
360-723-5709

<KRAFT 0720 AD_2020 Primary_Reflector.pdf>

<KRAFT GENERAL_1020 REFLECTOR AD.pdf>

Re: Fw: Invoice / The Unedited Videos

paulnkraft@yaho.../Inbox



Bryan White <talkwithbryan@icloud.com>
To: Vicki Kraft <vicki@vickikraft.com>
Cc: paulnkraft@yahoo.com <paulnkraft@yahoo.com>

Apr 29 at 9:40 AM

Hi Vicki and Paul,

I am doing well, and hope you are as well.

Here is the invoice as requested. Let me know if I can do more. Since we last met, I've been ramping up my equipment and what I can do, and I'd like to make use of that for keeping the right people in office!

Bryan

On Apr 28, 2021, 5:25 PM -0700, Vicki Kraft <vicki@vickikraft.com>, wrote:

Hi Bryan,

Hope you're doing well! Would you send me an invoice made out to Friends to Elect Vicki Kraft (similar to what you did for the video work in Primary Election) for the General Election video shoot below showing the \$1000 amount paid?

If you're able to reply all and send this to us by EOD this Fri., 4/30 would really appreciate it.

Thanks so much,
Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: Bryan White <talkwithbryan@icloud.com>
Sent: Monday, October 19, 2020 11:25 PM
To: Vicki Kraft <vicki@vickikraft.com>; Jesse Jimenez <jessejimenez9511@gmail.com>
Subject: The Unedited Videos

Sorry for the delay. Crazy weekend, but I am clear until I get everything done from this shoot. I have sent both of you an invite to the folder with the videos, and here is the link as well.

https://drive.google.com/drive/folders/1hh5UquQTUY7RnpgqOfiBQfuoX6KQK6_u?usp=sharing

1 File 34.9kB



Invoice - Vicki Kraft.pdf
35kB

ELUXURATE

INVOICE

(360) 900-2190
bryan@eluxurate.com

Attention: Vicki Kraft
Representative
Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

Project Title: Vicki Kraft Election Videos

Description	Date	Quantity	Unit Price	Cost
Social Media Videos	10/15/2020	1	\$1,000.00	\$1,000.00
			Subtotal	\$1,000.00
			Paid	\$1,000.00
			Total Due	\$0.00

Sincerely yours,

Bryan White
ELUXURATE Media

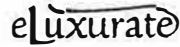
Audit Exhibit 1
Page 50 of 62



eLuxurate <quickbooks@notification.intuit.com>
To: paulnkraft@yahoo.com, vickickraft@gmail.com

Jun 15, 2020 at 10:48 AM

INVOICE 1002 DETAILS



eLuxurate

Dear Vicki Kraft,

Thank you for allowing eLuxurate to serve you. We appreciate you and your business.

Here is your latest invoice.

We appreciate you being a part of the eLuxurate community!

DUE 06/15/2020

\$0.00

Pay invoice

Powered by QuickBooks

Bill to

Vicki Kraft
Friends to Elect Vicki Kraft
2204 NE 158th St
Vancouver, WA 98686
United States

Terms

Due on receipt

06/12/2020

Video Production Services

\$500.00

1 X \$500.00

Total

\$500.00

Deposit

-\$500.00

Balance due

\$0.00

Paid. Will mark shortly after this is sent.

Pay invoice

eLuxurate

6820 NE 150th Pl Vancouver, WA 98682 US

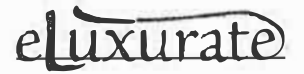
hello@promotionoutpost.com <https://www.eluxurate.com>

If you receive an email that seems fraudulent, please check with the business owner before paying.



eLuxurate
6820 NE 150th Pl
Vancouver, WA 98682 US
hello@promotionoutpost.com
https://www.eluxurate.com

Invoice 1002




BILL TO
Vicki Kraft
Friends to Elect Vicki Kraft
2204 NE 158th St
Vancouver, WA 98686
United States

DATE 06/15/2020	PLEASE PAY \$0.00	DUE DATE 06/15/2020
--------------------	----------------------	------------------------

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
06/12/2020	Video Production Services		1	500.00	500.00
Paid. Will mark shortly after this is sent.					TOTAL 500.00
					DEPOSIT 500.00
					TOTAL DUE \$0.00

PAID


THANK YOU.

 **FRIENDS TO ELECT VICKI KRAFT**
 2204 NE 158TH ST
 VANCOUVER, WA 98686


368
 96-505/1232
 50397


Date June 12, 2020

Pay to the Order of Eluxurate LLC \$ 500.00
Five hundred and 00/100 Dollars

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

For Video


 0368

 CHECK ARMOR
 Photo Safe Delivery Deposit on line

Account:4862882158 Serial:368 Amount:\$500.00 Sequence:39239160 TR:123205054 TranCode:0 Date:06/15/2020
 DepAccountNum:103205 Branch:0 Teller:0 XmitTC:0 Run:197 PocketNun:0 Batch:13 SiteNumber:0

1833 1254 0368

4862882158

Security Features exceed industry standards and include:


- Machine-readable MICR line at bottom and the MICR line on back (Pay to the order of)
- MobileBank or Mobile Deposit check mark to indicate check has been deposited via mobile device
- The Security Move - pattern on back designed to deter fraud
- Microprint features printed on front and back
- The words "ORIGINAL DOCUMENT" across the back
- Photo Safe Deposit icon visible on front and back

Do not cash if:

- Any of the features listed above are missing or appear altered
- Fugitive Ink on back looks pink or has disappeared
- Brown stains and colored spots appear on front and back

iQ CU 2 XF5065
 (Vancouver, WA)
 15705 NE Fourth Plai
 98682
 06/13/20-07:15:20
 7804
 <<<<<323383378>>>>>

CHECK HERE IF MOBILE DEPOSIT
 DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
 FOR FINANCIAL INSTITUTION USE





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:
 VICKI KRAFT FOR STATE REPRESENTATIVE
 ATTN: VICKI KRAFT
 PO BOX 821481
 VANCOUVER, WA 98682

Due Date	Invoice Date	Customer Number
10/31/20	10/1/20	93571
Terms	PO Number	Invoice Number
Net 30		00013658

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	\$340.00	\$340.00

Special Instructions	Subtotal	Invoice Tax	Shipping	TOTAL
	\$340.00	\$0.00		\$340.00

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

*Doorbelling
 Event*

Thank You For Choosing
 Papa John's Pizza
 Store #2953
 13521 SE 3rd Way #300
 Vancouver WA 98684
 (360) 253-9090

Name: ricki kraft

SALE

Order #: 0010 Phone / Carryout

Alena 10/03/2020 12:48 PM

Lane: 1

Card Type: Visa

Entry Mode: C

Account #: xxx:5933

Authorization #: 045703

Reference #: 313662

Batch ID: 840

Subtotal: 23.98

Tax: 2.01


Total: 25.99

Tip: 3.89

Visa: 29.88

Additional Tender Amt: 0.00


APPROVED

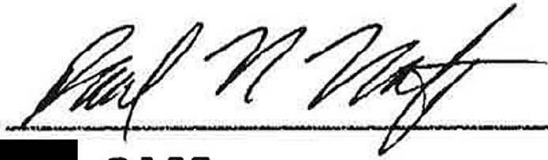
 **FRIENDS TO ELECT VICKI KRAFT**
 2204 NE 158TH ST
 VANCOUVER, WA 98688

379
 98-505/1232
 50397

Date Oct. 6, 2020

Pay to the Order of City of Vancouver \$ 340.00
Three hundred forty + 00/100 Dollars

 **UMPQUA** 1-866-4UMPQUA
 B.A.N.K (1-866-486-7782)

For Invoice ~~000~~ 00013658 

0379

Account:4862882158 Serial:379 Amount:\$340.00 Sequence:19568370 TR:123205054 TranCode:0 Date:10/13/2020
 DepAccountNum:103035 Branch:0 Teller:0 XmitTC:0 Run:85 PocketNun:0 Batch:13 SiteNumber:0

4862882158
 FRIENDS TO ELECT VICKI KRAFT

Security Features exceed industry standards and include:

- ImageMatchSM: Matching account and check number on back (Patent No. 9,240,088)
- MobileMarkSM: Mobile Deposit check mark to indicate check has been deposited via mobile device
- The Security WeaveSM pattern on back designed to deter fraud
- Microprint (MP) lines printed on front and back
- The words "ORIGINAL DOCUMENT" across the back
- Photo Safe DepositSM icon visible on front and back

Do not cash if:

- Any of the features listed above are missing or appear altered
- Fugitive ink on back looks pink or has disappeared
- Brown stains and colored spots appear on both front and back

CHECK HERE IF MOBILE DEPOSIT
 DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
 TR-1011711 FOR FINANCIAL INSTITUTION USE

4987 10/09/2020-04972703-8Trans 13seq



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

COLLECTION LETTER

VICKI KRAFT FOR STATE REPRESENTATIVE
 ATTN: VICKI KRAFT
 PO BOX 821481
 VANCOUVER, WA 98682


Date	Customer #	Amount Due
1/4/2021	93571	\$340.00

This is a courtesy reminder that the following invoice(s) are past due. Please remit payment to keep your account current. Please disregard this notice if you have already submitted your payment.

Invoice Number	Invoice Date	Due Date	Amount Due	Total Amount
00012857	9/1/20	10/1/20	\$340.00	\$340.00

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 collection letter

 **FRIENDS TO ELECT VICKI KRAFT**
 2204 NE 158TH ST
 VANCOUVER, WA 98688

405
 96-505/1232
 50397

Date Jan. 15, 2021

Pay to the Order of City of Vancouver \$ 340.00
Three hundred forty & 00/100 Dollars

UMPQUA BANK (866) 486-7782

For Invoice #00012857

[Signature]
 0405

Photo Safe Deposit® Details on back

Account:4862882158 Serial:405 Amount:\$340.00 Sequence:79200820 TR:123205054 TranCode:0 Date:01/21/2021
 DepAccountNum:103035 Branch:0 Teller:0 XmitTC:0 Run:3 PocketNun:0 Batch:13 SiteNumber:0

PORTLAND 20210120 00156

CH#405 \$340.00

⑆35750⑆ 17972021 1153736

ENDORSE HERE
 PAY TO THE ORDER OF

BANK OF AMERICA
 12300625
 FOR DEPOSIT ONLY
 CITY OF VANCOUVER
 1050000435 OR MOBILE REMOTE DEPOSIT
 *TELEPHONE OR FACSIMILE INSTRUCTIONS ON LINE ABOVE

At least one endorsement is required for all checks. If the check is cashed at a bank, the bank must endorse the check. If the check is cashed at a check cashing service, the service must endorse the check. If the check is cashed at a business, the business must endorse the check. If the check is cashed at a check cashing service, the service must endorse the check. If the check is cashed at a business, the business must endorse the check.

Fw: Customer Invoice

paulnkraft@yaho.../Campaign

 **Vicki Kraft** <vicki@vickikraft.com>
To: paulnkraft@yahoo.com <paulnkraft@yahoo.com>

Oct 5, 2020 at 1:13 PM

Paul,
Please pay, thanks!

Vicki

Vicki Kraft
Candidate for State Representative
17th Legislative District, Position 1 (R)
Phone: (360) 771-5201
www.VickiKraft.com

Friends to Elect Vicki Kraft
P.O. Box 821481
Vancouver, WA 98682

From: cityofvancouver@myworkday.com <cityofvancouver@myworkday.com>
Sent: Friday, October 2, 2020 1:20 PM
To: Vicki Kraft <vicki@vickikraft.com>
Subject: Customer Invoice



This email was intended for vicki@vickikraft.com

1 File · 102.7kB




VICKI KRAFT FOR STATE REPRESENTATIVE 00013658 2020-10-02.pdf
103kB

The Messenger contract

Barb Maynard <barb.vanmessenger@gmail.com>

Tue 6/16/2020 4:37 PM

To: Vicki Kraft <vicki@vickikraft.com>; Marita Sempio <msempio@integra.net>

 1 attachments (869 KB)

Vicki Kraft 2020 Contract.pdf;

Vicki:

Thank you for inquiring about advertising with us. As always, Marita is happy to accommodate our community and support me so she will be happy to have you with us. Attached is your contract.

Please print, sign and scan it and return it to me by email at your very earliest convenience. Please "reply all" so that she will receive a copy immediately. I am doing my best to gather all the ad copy. I see that you placed an ad in our July 2018 issue.

Best regards and it is great to have you back with us!

Barb Maynard

Advertising Director

360-750-9900

971-235-3366

barb.vanmessenger@gmail.com



Audit Exhibit 1
Page 60 of 62

Advertising Contract

Contact Information:

Acct. No.: _____

Company Name Vicki Kraft for State Representative Contact Name Vicki Kraft

Phone Number 360-771-5201 Fax _____ Email vicki@vickikraft.com

Street Address P. O. Box 821481

City Vancouver State WA Zip 98682

Billing Address (if different than street address) _____

City _____ State _____ Zip _____

Ad Size 1/4 page color vertical-2 col (5" wide) x 7.88" tall **Contract Length** 3 Month(s)

Cover Position (if applicable) _____ **Monthly Cost** \$ 460

Color Options (Check One) 1-color 2-color 4-color **Production Fee** \$ 0

Advertiser will run 3 insertion(s) during the twelve (12) month period beginning with the July 20 20 issue at the rates published in rate card number 17.

Ad Run Dates (Circle each month)

January February March April May June
July August September October November December

After receiving completed contract, an invoice will be sent to you from the City of Vancouver with payment instructions. Please pay after you receive your invoice by mailing payment to the address on the invoice or you can call in your payment to the City of Vancouver at 360-487-8454.

Advertising Options		
<input type="checkbox"/> Senior Finder: Size _____	Cost \$ _____	Notes: _____

To receive initial invoice, please select one of the delivery options below:

Fax invoice to _____ E-mail invoice to vicki@vickikraft.com

Audit Exhibit 1

Page 61 of 62

Authorized by X _____

Date June 16, 2020

Printed Name Vicki Kraft

Messenger Representative Barb Maynard

Return contracts only to:

The Messenger, Advertising
400 E. Evergreen Boulevard, Suite 111
Vancouver, Washington 98660
(360) 750-9900 • Fax (360) 750-9907

Terms and Conditions

1. All rates are net (non-commissionable)
2. Billing is sent out the first week of each month, due in 30 days.
3. Future invoices will be mailed to billing address provided on the contract, with the exception of political advertisements. Billing is sent out the first week of each month, due the last working day of the month.
4. The publisher reserves the right to accept or reject all advertising copy which at his/her discretion is deemed objectionable, misleading, not in the best interests of the reader, or contrary to federal or state regulations, whether or not the ad has previously been accepted and/or published.
5. It is understood that the advertiser and/or advertising agency will indemnify and save the Publisher harmless from and against any loss, expense or other liability resulting from any claims or suits for libel, violation of right of privacy, plagiarism, copyright infringement and any other claims or suits that may arise out of the publication of such advertisement.
6. No cancellation accepted after deadline date. Cancelled contracts will be re-billed according to the actual number of insertions that occurred during the contract term.
7. Publisher reserves the right to announce rate increases with 60 days written notice. Advertising in issues subsequent to such an increase will be billed at rates then prevailing.



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.pdcc.wa.gov

April 22, 2021

Sent Electronically to Vicki Kraft and Paul Kraft, 2020 Campaign Treasurer

Subject: PDC Audit Letter, 2020 Vicki Kraft for State Representative Campaign; PDC Audit No. 20-12

Dear Representative Kraft and Mr. Kraft:

This letter is a follow-up to the email PDC staff sent notifying both of you that the 2020 Vicki Kraft for State Representative Campaign had been selected for audit and that you would be receiving an email with this attached letter from staff concerning the audit. Pursuant to RCW 42.17A.105 and .110, the Public Disclosure Commission (PDC) has a mandate to conduct audits of candidates, committees, and other filing entities. Based on that authority, PDC staff has in the past conducted audits of candidates and political committees, lobbyists and lobbyist employers, and state agency lobbying activities in accordance with chapter 42.17 RCW. The PDC began conducting several limited-scope audits the first of December 2020.

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 previously identified four 2018 Legislative Districts elections for State Senate that comprised the initial audit pool of eight candidates selected for limited-scope audits that have substantially been completed. Staff is using the same criteria in selecting the 2020 House of Representative candidates for audit that was used for the 2018 Senate candidates that included both candidates appearing on the November 3, 2020 general election ballot, in a contested election, with significant contribution and expenditure activities.

Based on the criteria listed above, the 2020 State Representative race in the 17th Legislative District, Position #1 was selected for a limited-scope audit. For your information, most of the audit work will involve PDC staff reviewing information disclosed on C-3 reports and C-4 reports that were filed electronically by each campaign. Staff will confirm and verify select contributor and vendor expenditure information, and be requesting documentation from both Campaigns, including copies of campaign books of account maintained by the Campaign for the specific expenditures listed below.

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

1. Staff noted that the Campaign made 40 expenditures to Gateway Communications during the 2020 Campaign totaling \$60,938.69, and is requesting campaign records and documentation for the following expenditures:
 - The six expenditures made on October 12, 2020 totaling \$8,278.92 for “General Mailer 1.”
 - The five expenditures made on October 15, 2020 totaling \$7,978.92 for “General Mailer 2.”
 - The five expenditures made on October 23, 2020 totaling \$12,427.33 for “General Mailer 3.”
 - The five expenditures made on October 30, 2020 totaling \$6,311.09 for “General Mailer 4.”
2. Two expenditures totaling \$30,000 made to Alpha Media for “Digital Advertising” that included a \$25,000 expenditure made on October 14, 2020; and a \$5,000 expenditure was made on October 23, 2020. Staff noted their appeared to have been a \$1,066.15 refund or rebate made from Alpha Media on January 15, 2020, so please provide the documentation for that activity as well.
3. Two expenditures made to The Reflector totaling \$1,910 for newspaper “Advertising” that included a \$1,097 expenditure on November 10, 2020; and a \$813 expenditure made on August 17, 2020.
4. Two expenditures made to Eluxurate LLC totaling \$1,500 for a “Video Shoot” and a “Video Shoot and Facebook Live Event” that included a \$1,000 expenditure made on October 15, 2020; and a \$500 expenditure made on June 12, 2020.
5. Two expenditures made to the City of Vancouver totaling \$680 for “Advertising -Senior Messenger” that included a \$340 expenditure on October 6, 2020; and a \$340 expenditure made on January 15, 2021.

Staff is also requesting that each Campaign provide a response concerning 2020 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 2020 Campaign contribution process from receipt of a contribution, to entering the contributor information into ORCA, the name of the person depositing the contributions, how often contributions were deposited, and the filing of the C-3 report. In addition, if online contributions were received by the Campaign, please explain how those contributions were processed as well.
2. Explain the 2020 Campaign expenditure process including the placing of the orders for political advertisements, identifying who placed the orders, to making the expenditure, picking up the goods and/or services provided, and the disclosing of the expenditure on the C-4 report. In addition, explain the process for disclosing orders placed.
3. Describe the process for reviewing and filing the C-3 and C-4 reports, as well as the communication that occurs between the candidate and the Treasurer concerning the contribution and expenditure information being disclosed.

In addition, does the candidate review the reports either before or after they have been filed?

4. Describe how the Campaign records are maintained for all contribution and expenditure activities, and what those records include.
5. Who was responsible for the Campaign records, did the Campaign make the books of account available during the public inspection period, was an inspection requested, and what documents were made available during the inspection?
6. Did the candidate or any Campaign officers or volunteers received reimbursements during the 2020? 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 **May 6, 2021**. If you need additional time, please do not hesitate to contact Kurt Young, PDC Compliance Officer.

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

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

Sincerely,

Endorsed by,

/s
Electronically Signed Kurt Young
Compliance Officer

/s
Electronically Signed Peter Lavalley,
PDC Executive Director

