



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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March 8, 2021

Sent Electronically to Senator Ericksen and Bruce Ayers, Treasurer

Subject: PDC Audit Report Cover Letter Re: 2018 Doug Ericksen for Senate Campaign audit,
PDC Audit No. 20-01

Dear Senator Ericksen and Mr. Ayers:

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

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

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

Sincerely,

Endorsed by:

s/ _____
Electronically Signed Kurt Young,
PDC Compliance Officer

s/ _____
Electronically Signed Peter Lavallee,
PDC Executive Director



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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17A

2018 Doug Ericksen for Senate
Campaign

Respondent.

PDC Audit No. 20-01

Audit Report

I.

Audit Scope

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

Once the eight Senate audits have been completed, PDC staff will be selecting eight candidates for State Representative from the 2020 election cycle to conduct limited-scope audits based on the same audit criteria listed above.

II. **Audit: Respondent Background**

- Doug Ericksen is an incumbent State Senator in the 42nd Legislative District, since being elected to that office in 2010. He was re-elected State Senator in 2014 and 2018.
- Prior to that, Senator Ericksen served as State Representative, Position 1 in the 42nd Legislative District from 1998 through 2010.
- On September 9, 2015, Doug Ericksen filed a Candidate Registration (C-1 report) declaring his candidacy for re-election to the office of State Senator in the 42nd Legislative District in 2018, selecting the Full Reporting Option and initial listing his Treasurer as “To Be Determined” but later listed Kristi Harting as Treasurer.
- On May 12, 2019, Doug Ericksen filed a C-1 report declaring his candidacy for re-election to the office of State Senator in the 42nd Legislative District in 2022, selecting the Full Reporting Option and listing Ayers Consulting, LLC as Treasurer.
- On December 21, 2020, PDC staff sent an email to the Doug Ericksen Campaign, and attached a letter notifying him that staff was conducting audits of four 2018 contested Senate races as previously discussed with Bruce Ayers, Treasurer for the 2022 Campaign, during a telephone conversation. The letter stated staff was conducting a limited-scope audit of the two 2018 candidates that ran for State Senator in the 42nd Legislative District, which included Senator Ericksen’s Campaign.
- The Audit letter requested documentation maintained by the Campaign for selected expenditures made during the 2018 election cycle. In addition, the letter requested the Campaign provide a brief narrative concerning general campaign practices, including the processing and handling of contribution and expenditure activities and the record keeping practices and maintenance of the campaign books of account.
- As noted above, the audits provide the PDC and the public with an opportunity to determine the degree of compliance with the PDC reporting requirements, thereby enhancing and strengthening the public’s confidence in the campaign finance information being disclosed by filers. The audits also assist in identifying areas in the reporting of campaign contribution and expenditure activities that may suggest a need to update or revise the advice on the PDC website in the PDC online candidate manuals, and from Filer Assistance staff, and areas of potential changes in the law or amendments made to the PDC rules to further clarify a specific reporting requirement.

- The limited-scope audits consist primarily of reviewing the Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by each Campaign, and queries conducted by PDC staff of the contribution and expenditure databases on the PDC website. The information is reviewed to determine the Campaigns timeliness and accuracy in disclosing contribution and expenditure activities undertaken on the C-3 and C-4 reports in accordance with the reporting requirements found in RCW 42.1A.235 and .240.

II. **Audit Findings**

- The 2018 Doug Ericksen for Senate Campaign (Campaign) disclosed receiving \$345,758 in total contributions and \$325,605 in total expenditures made, with \$20,153 as a cash on hand balance as of December 31, 2018 on the “Final” report. The Campaign did not carry forward any funds from the 2014 election cycle, and received eight initial contributions on September 21, 2015, totaling \$4,050 which began the 2018 re-election campaign.

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

- Candidates appearing on the 2018 primary and general election ballots who selected the Full Reporting option were required to file weekly C-3 reports every Monday beginning June 1, 2018 through the date of the general election, disclosing contributions that were received and deposited the previous seven days. Prior to June 1, 2018, candidates were required to file monthly C-3 reports for deposits of campaign contributions made during the month or period covered by the C-4 report.
- RCW 42.17A.220 requires candidates to timely deposit monetary contributions received into the campaign bank account or depository within five business days of receipt.
- For the 2018 election cycle, the Campaign filed C-3 reports disclosing contributions received covering the period September 9, 2015 through December 31, 2018, that included 594 separate monetary and in-kind contributions totaling \$345,758. The \$345,758 in total monetary and in-kind contributions received included \$115 in anonymous contributions received totaling, and \$1,92 in small non-itemized contributions as disclosed on C-3 reports.
- The Campaigns two largest contributors for 2018 election cycle included the following:
 1. Washington State Republican Party (WSRP): The Campaign received a total of \$52,632 from the WSRP for eight in-kind contributions received during the 2018 election cycle for the printing and postage of mailers that were distributed by the WSRP in support of Senator Ericksen, the majority of the mailers were distributed between October 16 through 26, 2018.
 2. Senate Republican Campaign Committee (SRCC): The Campaign received a \$50,000 monetary contribution from the SRCC on October 8, 2018.
- Based on the number of C-3 reports filed by the Campaign, staff reviewed approximately every fifth C-3 report filed for contributions received and deposited beginning June 1, 2018, when the accelerated reporting requirements began for C-3 reports for 2018 candidates.

- Under that reporting requirement, C-3 reports are required to be filed every Monday for contributions received and deposited the preceding seven calendar days. The 2018 C-3 reports filed by the Campaign and reviewed by staff included the following:

Date Received	Date Deposited	# of contributors and description	Amount	C-3 Filing Date	Days Late
6/18/2018	6/18/2018	19 total contributions: \$2,000 from Century Link; AGC; and Assn. of Builders & Contractors.	\$13,035	6/24/2018	0
7/10/2018	7/10/2018	Seven total contributions: \$2,000 from WA Hospitality PAC; \$1,000 from PHARMA; Walgreens; Pacific Corp and RH PAC.	7,250	7/10/2018	0
8/2/2018	8/2/2018	16 total contributions: \$2,000 from Avista; \$1,805 from Anheuser Busch.	\$11,945	8/2/2018	0
8/31/2018	8/31/2018	18 total contributions: \$1,000 from WA Retail Assn; WA Engineers PAC; Ash Grove Cement Co.	\$6,129	8/31/2018	0
9/7 – 9/10/2018	9/11/2018	6-page C-3 report, 57 contributions: \$1,000 from Georgia Pacific; WA Optometric PAC; Schnitzer; WITPAC + 13 small contributors.	\$15,320	9/11/2018	0
9/18/2018	9/19/2018	27 total contributions: \$1,000 from Build East PAC; WA Food PAC; Trucking Action Committee; WA Oil Marketers; WA Food Industry PAC; and Charter Communications.	\$10,575	9/18/2018	0
9/27/2018	9/28/2018	\$1,000 contribution from Amazon.	\$1,000	9/26/2018	0
10/8/2018	10/9/2018	Six total contributions including \$50,000 from Senate Republican Campaign Committee; \$1,000 from WA Self Insurers Assn; Williams Company, and Health Insurance Agents PAC.	\$54,270	10/12/2018	0
10/18/2018	10/19/2018	16 contributions: \$1,000 from Big I PAC; USAA + two individuals.	\$6,700	10/19/2018	0
11/1/2018	11/1/2018	Seven contributions: \$1,000 from Walmart; Weyerhaeuser; American Chemical Council; & WA Forest Protection Assn.	\$5,750	11/1/2018	0
12/2 – 12/6/2018	12/6/2018	Six contributions, all individuals \$50 to \$250.	\$550	12/9/2018	0
12/14/2018	12/16/2018	Three contributions: \$1,000 each from two individuals.	\$2,600	12/16/2018	0
Totals			\$135,124		

- PDC staff reviewed the 12 C-3 reports listed in the chart above totaling \$135,124, which represented 39.1 percent of the \$345,758 in total contributions received during the 2018 election cycle. As noted in the table above, the Campaign timely filed all 12 of the C-3 reports reviewed by staff as part of this audit.

- In addition, the review verified that the Campaign timely deposited the contributions received within five business days of receipt in accordance with RCW 42.17A.220.
- PDC staff downloaded the 2018 contribution database for the Campaign as a CSV file into an Excel spreadsheet, formatted and sorted the spreadsheet, and then conducted a review of the 2018 contributor information disclosed on C-3 reports. As part of that review, staff confirmed the Campaign complied with the 2018 election contribution limits.
- Staff’s review indicated the Campaign disclosed the required Employer and Occupation information for 77 individuals who contributed more than \$100, as well as disclosing “Retired” for an additional 40 individual contributors.
- The PDC audit procedures include staff identifying contributors that made monetary contributions to the Campaign and then verifying or confirming information disclosed concerning that specific contribution. 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 CY 2018, and made contributions in 2018 to the Campaign.
- Staff reviewed the contribution spreadsheet and selected 10 PAC contributors that made monetary contributions totaling at least \$1,000 to the Campaign during the 2018 election, and also reviewed the corresponding C-3 reports filed by the Campaign disclosing each PAC contribution. The review included listing the date the contributions were received, the date the contributions were deposited, and the date the C-3 report was filed.
- Staff then reviewed the C-4 reports filed by the selected contributing PAC listed in the chart below for the corresponding contribution expenditure information disclosed on the Schedule A to C-4 report. The contribution information from the Campaign C-3 reports and the contribution expenditure information from the PAC C-4 reports was entered into the chart below and included the following:

Date Received Campaign	Contributor name	Amount	C-3 Report Filed	Date Made By Donor	Disclosed by Donor	# of Days
9/18/2018	WA Food PAC	\$1,000	9/18/2018	8/30/2018	C-4 report	19
9/18/2018	Trucking Action Committee	\$1,000	9/18/2018	9/7/2018	C-4 report	11
10/23/2018	WA Assoc of Realtors PAC	\$1,000	10/24/2018	10/3/2018	C-4 report	21
7/16/2018	WA State CPA PAC	\$1,000	7/17/2018	6/5/2018	C-4 report	42
10/3/2018	WA Electrical Coop PAC	\$1,000	10/4/2018	9/28/2018	C-4 report	7
10/3/2018	NUCOR PAC of WA	\$1,000	10/4/2018	9/27/2018	C-4 report	8
9/18/2018	Build East PAC	\$1,000	9/18/2018	8/28/2018	C-4 report	21
8/6/2018	WA State Dental PAC	\$2,000	8/6/2018	6/27/2018	C-4 report	40
8/6/2018	WASHBANK PAC	\$2,000	8/6/2018	7/30/2018	C-4 report	7
7/16/2018	WA State Auto Dealers PAC	\$1,000	7/17/2018	6/1/2018	C-4 report	46

- The review indicated that the Campaign received and deposited five of the contributions and filed the C-3 report all on the same date. The remaining five contributions were received, deposited and had a C-3 report filed by within one day of receipt

- As noted in the chart above, the Campaign disclosed the contributor's names for the 10 monetary contributions from the selected PAC's within seven to 46 days after being received by the Campaign. Staff based that information solely on the dates the expenditure for the contribution were disclosed as having been made by the PAC on the corresponding C-4 report, and the date the contribution was disclosed as having been received on the C-3 report filed by the Campaign.

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

- Candidates under the Full Reporting option in 2018 were required to file monthly C-4 reports by the 10th of each month disclosing contribution and expenditure activities incurred in the previous calendar month, and candidates appearing on the 2018 primary and general election ballots were required to file the following C-4 reports:
 - A 21-day Pre-Primary election C-4 report was due on July 17, 2018, covering the period June 1 through July 16, 2018.
 - A 7-day Pre-Primary election C-4 report due on July 31, 2018, covering the period July 17 through July 30, 2018.
 - A Post-Primary election C-4 report by September 10, 2018, covering the period August 1 through August 31, 2018.
 - A 21-day Pre-General election C-4 report was due on October 16, 2018, covering the period September 1 through October 15, 2018.
 - A 7-day pre-General election C-4 report due on October 30, 2018, covering the period October 16 through October 29, 2018.
 - A Post-General election C-4 report by December 10, 2018, covering the period October 30 through November 30, 2018.
- During 2018, the Campaign timely filed C-3 and C-4 reports throughout the year including for 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	Contrib. Received	Expend. Made	Expenditure details	Days Late
January 2018 C-4 report	N/A	N/A	N/A	N/A	N/A	N/A
February 2018 C-4 report	3/10/2018	3/10/2018	\$0	\$0	N/A	N/A
March 2018 C-4 report	4/10/2018	4/10/2018	\$6,450	\$0	\$6,450 deposit made on 3/27/18.	
April 2018 C-4 report	5/10/2018	5/7/2018	\$0	\$309	Alaska Air \$264 on 4/24/18 for travel	
May 2018 C-4 report	6/10/2018	6/5/2018	\$2,757	\$3,367		
2018 21-Day Pre Primary C-4 report	7/17/2018	7/17/2018	\$38,865	\$11,852	\$5,600 + Yard signs and brochures (no info on #'s printed).	

2018 7-Day Pre Primary C-4 report	7/31/2018	7/31/2018	\$15,095	\$7,097	\$2,450 to Cascade Radio Group-no station details provided.	
2018 Post-Primary C-4 report	9/10/2018	9/10/2018	\$28,424	\$22,557	\$3,825 + \$4,200 to Cascade Radio Group-no station details provided.	
2018 21-Day Pre-General C-4	10/16/2018	10/16/2018	\$102,590	\$80,365	\$9,505 to Cascade Radio Group-no station details provided.	
2018 7-Day Pre-General C-4 report	10/30/2018	10/30/2018	\$86,482	\$117,228	\$52,632 IK cont from WSRP; Digital Ads \$12,000 Minnick Group- no breakdown provided.	
2018 Post General election C-4 report	12/9/2018	12/10/2018	\$ 8,125	\$32,285	Digital Ads \$3,000 Minnick Group- no breakdown provided.	

- The Campaign disclosed no orders placed, debts or obligations on the 21-Day and 7-Day Pre-General Election C-4 reports, or on the Post-Election C-4 report, or on any of the C-4 reports reviewed for the 2018 election cycle. Staff noted there were a few expenditures made for Campaign political advertising which did not disclose the number of mail pieces distributed in the description listed on the C-4 reports.
- There were no candidate loans made to the Campaign, or any loans from a contributor for the 2018 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 2018 election cycle. The vendors receiving the largest Campaign expenditures during the 2018 election included the following:
 1. 14 expenditures totaling \$56,693 to Lithtex NW for printing and postage costs for Campaign political advertisement mailings.
 2. 15 expenditures totaling \$45,407 to Comcast Spotlight for television political advertisements.
 3. Eight expenditures totaling \$22,085 to Cascade Radio Group for radio political advertisements.
 4. Five expenditures totaling \$20,450 to Praise 106.5 Radio for radio political advertisements.
 5. Two expenditures totaling \$15,000 to the Minnick Group for digital political advertisements.
 6. Eight expenditures totaling \$14,732 to Manis Pierre for management and canvassing services.
- PDC staff requested the Campaign provide copies of the books of accounts maintained for 15 expenditures that were made by the Campaign during the 2018 election, including supporting documentation such as invoices, receipts, cancelled checks, notes, emails, etc.

- On January 18, 2021, the Campaign sent an email to the PDC with several attachments providing the requested documentation for the selected expenditures listed in the Audit letter. **Audit Exhibit #1.**
- PDC staff has included the Campaign expenditures selected for review below as listed on the C-4 reports, followed by a summary of the information contained on the documentation provided to the Campaign by that specific vendor including dates, amounts and a description of the services disclosed on the invoices and documentation provided by the Campaign. A summary of the information provided by the Campaign was reviewed by staff for the expenditures listed below and included the following:
 1. Two expenditures totaling \$11,044.52 were made on September 7, 2018, to Lithex NW for printing and postage to mail the Meet and Greet Postcard.
 2. Three expenditures totaling \$12,376.48 were made on October 15, 2018, to Lithex NW for printing, postage and a mailing.
 3. Two expenditures totaling \$11,813.07 were made on October 25, 2018, to Lithex NW for printing and postage for a mailer.

The documentation included Lithex invoices #77153; #77401; #78533; #78543; and #78543.1, which are described below.

Lithex Invoice #77153: The invoice date was September 7, 2018, for the Doug Ericksen Campaign, and listed Shawn VanDyken as the Lithex Sales Representative, that the Shipping Method was “Will Call”, the payment terms were “Prepaid” with a September 7, 2018 order due date. The description on the invoice stated that Lithex printed 50,000 mail pieces for \$3,456, \$85 for a typeset fee, \$308.07 for sales tax, for a total cost of \$3,849.07.

Lithex Invoice #77401: The invoice date was September 7, 2018, for the Doug Ericksen Campaign, and listed Mr. VanDyken as Sales Representative, that the Shipping Method was “USPS”, that the payment terms were “Prepaid” with a September 7, 2018 due date. The description on the invoice stated that Lithex printed five versions of a “Meet and Greet Postcard Mailer” for a total of 51,000 mail pieces for \$2,602, \$50 for a typeset fee, and \$865 for Mail Prep.

The invoice included the Postage costs for five different mail drops of the postcard that included: (1) Blaine/Birch Bay – 9,798 pieces totaling \$1,528.49; (2) Lynden/Meridian – 11,207 pieces totaling \$1,748.29; (3) Sumas/Everson – 7,913 pieces totaling \$1,364.21; (4) Ferndale – 10,219 pieces totaling \$1,594.16; and (5) Bellingham – 6,323 pieces totaling \$986.39. The invoice stated \$305.98 was paid for sales tax, for a total cost of \$11,044.52.

Lithex Invoice #78533: The invoice date was October 25, 2018, for the Doug Ericksen Campaign, listed Mr. VanDyken as Sales Rep., the Shipping Method was “USPS” and that the payment terms were “Prepaid” with an October 25, 2018 due date. The description on the invoice stated that Lithex printed 10,000 postcards entitled “\$4 Billion New Taxes – Vote or Die costing \$1,076 to print. The invoice also listed \$85 for a typeset fee, \$350 for mail prep, \$175 delivery fee to Seattle USPS, the postage for 9,918 pieces cost \$2,183.27, and \$146.68 for sales tax was \$146.68 for a total cost of \$4,015.95.

Lithtex Invoice #78543.1: The invoice date was October 25, 2018, for the Doug Ericksen Campaign, and listed Mr. VanDyken as Sales Rep., the Shipping Method was “USPS” and that the payment terms were “Prepaid” with an October 25, 2018 order due date. The description on the invoice stated that Lithtex printed 10,000 postcards entitled “Property Rights/Gun Rights – Vote or Die” costing \$968 to print. The invoice also listed \$85 for a typeset fee, \$350 for mail prep, \$175 delivery fee to Seattle USPS, the postage for 9,918 pieces cost \$2,183.27, and \$137.29 for sales tax for a total cost of \$3,898.56.

Lithtex Invoice #78543: The invoice date was October 25, 2018, for the Doug Ericksen Campaign, and listed Mr. VanDyken as Sales Rep., the Shipping Method was “USPS” and that the payment terms were “Prepaid” with an October 25, 2018 order due date. The description on the invoice stated that Lithtex printed 10,000 postcards entitled “No Carbon Tax – Vote of Die” costing \$968. The invoice also listed \$85 for a typeset fee, \$350 for mail prep, \$175 delivery fee to Seattle USPS, the postage for 9,818 pieces cost \$2,183.27, and \$137.29 for sales tax for a total cost of \$3,898.56.

Additional Lithtex documentation: The Campaign provided a copy of an October 12, 2020 email string between Senator Ericksen and Mr. VanDyken, requesting the total projected Lithtex costs for printing and mailing four Campaign mail pieces, and the printing costs for a flyer to hand out. The information included the printing Lithtex had scheduled for the political advertisements listed below.

- 30,000-piece mailer entitled “About Doug Tabloid” was planned to drop on October 17, 2018, costing \$10,323.
 - 30,000-piece mailer entitled “Compare/Contrast” was planned to drop on October 22, 2018, costing \$9,949.
 - 7,500-piece mailer entitled “Vote or Die – Version 1” was planned to drop on October 26, 2018, costing \$2,654.
 - 7,500-piece mailer entitled “Vote or Die – Version 2” was planned to drop on October 31, 2018, costing \$2,654.
 - 20,000 copies of a flyer entitled “Compare/Contrast Hand-out” is planned for delivery on October 17, 2018 costing \$1,602.
4. A \$12,000 expenditure was made to the Minnick Group on October 17, 2018 for digital ads.

The documentation included Minnick Group invoice #1068 that was dated October 17, 2018, billed to Doug Ericksen and listed a total cost of \$12,000. The invoice included three entries under the Item Code and Description fields stating: (1) “Web Media: Digital Ad Buy [Oct 19-Oct 23]” totaling \$4,350; (2) “Web Media: Digital Ad Buy [Oct 24-Oct 30]” totaling \$6,100; and (3) “Commission Income: 15% Placement Fee” totaling \$1,550.

5. A \$9,505 expenditure was made on October 11, 2018 to Cascade Radio Group for radio ads.

The documentation included a two-page Cascade Radio Group “Statement of Account” for the Doug Ericksen Campaign that was dated November 12, 2018 and listed six different local radio stations as part of the radio advertising media buy.

The information stated the payment was received from the Campaign on October 12, 2018, and the breakdown for the radio buy included: (1) KPUG-AM was listed for three different buys of \$3,080, \$1,350 and \$820; (2) KBAI-AM was listed for two different buys of \$815 and \$560; and (3) KGMI-AM was listed for one buy totaling \$2,880.

6. A \$6,500 expenditure was made on September 29, 2018 to Comcast Spotlight for TV ads.

The documentation included a three-page copy of a Comcast “Order Contract” for the Doug Ericksen Campaign indicating the ad run date that started on October 1, 2018 and ended on October 14, 2018. The contract included a “Last Changed date of September 27, 2018, listed Brett Bonner as the Campaign contact person, the Product type as “Political”, the Revenue Type as “Local Political Bundle Bill”, noted a 15% agency discount, and indicated the Payment Terms was “Cash in Advance.”

The specific buy information indicated that Doug Ericksen ads would run daily in the Seattle Comcast Spotlight market on ESPN, FX, Hallmark, HGTV, The Golf Channel, A & E, and FS1 on a weekly basis for the periods 10/1/18 to 10/7/2018, and 10/8/2018 to 10/14/2018.

7. A \$3,000 expenditure was made on October 30, 2018 to the Minnick Group for digital ads.

The documentation included Minnick Group invoice #1088 that was dated October 28, 2018, billed to Doug Ericksen for a total cost of \$3,000, and the invoice listed three entries under the Item Code and Description fields. The invoice stated: (1) “Web Media: Video Display Advertising [Oct 31-Nov 5]” totaling \$1,800; (2) “Web Media: Digital Display Advertising” totaling \$800; and (3) “Commission Income: 15% Placement Fee” totaling \$400.

8. A \$2,069.64 expenditure was made on September 10, 2016 to Gamble Sands as a fundraising expense.

Mr. Ayers stated there was no documentation maintained by the Campaign for this expenditure. The Treasurer confirmed the expenditure details were properly disclosed on the C-4 report according to a reconciliation of the Campaign bank statement.

9. The vendors that comprised the \$1,307.50 expenditures made on October 30, 2018 and listed as “Expenses of \$50 or less.”

No documentation was provided by the Campaign for the expenditures of \$50 or less that comprised the \$1,307.50. Staff would note that the Campaign included several attachments as part of the documentation production that could not be opened by staff upon receipt, and Ms. Harting noted that she could not open them prior to sending them to Mr. Ayers.

10. Two expenditures totaling \$1,15.27 were made to Facebook on October 29, 2018 (\$500), and November 30, 2018 (\$615.27) for “Social Media” and “November ads.”

The documentation was dated October 29, 2018 email from the Facebook Ads Team, that included a Facebook receipt for Noggin Branding followed by an Account number for \$500 for Doug Ericksen ads that appeared on Facebook from October 16, 2018 at 11:00 am – October 29, 2018 at 8:30 am.

The receipt stated that the Ericksen campaign was “being billed because you reached your \$500 billing threshold” and listed at least ten different posts from Senator Ericksen that received between 133 impressions costing \$2.74 up to 10,244 impressions costing \$139.99.

- As part of the audit, PDC staff requested each Campaign provide information concerning general campaign practices such as internal compliance controls, procedures for processing, depositing, recording and disclosure of contribution, procedures for making and reporting expenditures, including for debts, obligations, and orders placed, in-kind contributions, and candidate loans.
- Mr. Ayers stated in a January 18, 2021, response email he was not the Treasurer for the 2018 Doug Ericksen Campaign, and was retained by the Campaign after the 2018 election as part of the 2022 re-election Campaign Team. He stated that he reached out and contacted Kristi Harting, Campaign Treasurer, sending her a copy of the Audit Letter requesting that she compile the documentation for the expenditures selected for Audit. He stated that Ms. Harting sent him the Audit documents she had maintained and noted that she did not “have any receipt for the 2016 Gamble Sands fundraising expense, just the bank statement confirmation of payment.”
- Mr. Ayers stated that Ms. Harting was not able to locate copies of all the requested invoices and receipts for the selected expenditures staff requested, and added that his understanding was that 2018 Campaign “designated Brett Bonner, as the media buyer for the campaigns political advertising. He would provide receipts and invoices by email most of the time. Sometime the paper invoice attachments were not timely either from Mr Bonner or from the candidate.” He stated that Ms. Harting “would rely on verbal descriptions and bank statements for confirmations of check and credit card expenses when there was no paper receipt available to insure timely filings.”
- The Campaign provided a letter from Ms. Harting in response to staff’s questions about the processes used for the 2018 election cycle. **Audit Exhibit #2.** The letter from Ms. Harting included the following:

1. Describe the Campaign contribution process: Mr. Harting stated that as Treasurer, she picked up mail from Campaign post office box or sometimes directly from the candidate, which included monetary contributions received through the mail. She stated that once she had possession of a contribution check, she would make a copy of the check(s) received, and then deposit those contributions into the Campaign bank account. She stated that she “*made most of the deposits for 2018 campaign. Others were made by candidate and copies/pics sent to treasurer. Information from the checks were entered into Orca weekly, C3 reports filed according to PDC guidelines.*”

Mr. Harting stated that the Campaign did receive monetary contributions online for the 2018 election cycle thru PayPal’s, and that she received the contribution confirmation information from PayPal’s by email. She stated that the online contributions received by the Campaign from the PayPal contributors were timely disclosed and included in the weekly or monthly C-3 reports.

Ms. Harting stated that when she transferred the funds from the Campaign PayPal account into the campaign bank account, the PayPal fees were deducted at that time as an expense.

2. Describe the Campaign expenditure process: Ms. Harting stated that “Brett Bonner was in charge of media for the campaign and handled all media buys/political advertising” and added that the candidate also made some of the expenditures. She stated that both Mr. Bonner and Senator Ericksen emailed receipts to her for the expenditures that they made. She stated that she entered the expenditure information into the PDC campaign filing software (ORCA) and completed and filed the C-4 reports.

Ms. Harting stated that she reviewed the Campaign bank statements and reconciled the expenditures made and the contributions received. She stated that if she did not receive copies of the invoices or receipts, she would request either Senator Ericksen or Mr. Bonner to provide her with those documents. She stated if no documentation was “received by time report was due, the C-4 report was filed according to bank statement record of expenditure.”

3. Describe the process for reviewing and filing the C-3 and C-4 reports: Ms. Harting stated that Senator Ericksen did not physically review the Campaign C-3 or C-4 reports that were filed by her on behalf of the Campaign, but was aware of the contribution and expenditure activities that were disclosed on the reports. She stated she entered the contribution and expenditure information into ORCA, and she electronically filed the completed C-3 and C-4 reports. Ms. Harting stated she would ask for a receipt or invoice for Campaign expenditures or additional clarification or information, if that was needed for a specific contribution or expenditure activity to properly file that report.
4. Describe the Campaign books of account and how those records are maintained: Ms. Harting stated that the Campaign records (i.e., books of account) were maintained by her as Treasurer, and that the records were kept by her both electronically and on paper. She stated that the books of accounts included copies of Campaign “bank statements, receipts, copies of deposited checks.”
5. Person responsible for Campaign records and 2018 public inspection period requests: Ms. Harting stated that the 2018 Campaign books of accounts and records were maintained by her, and that the Campaign did not receive any requests to conduct a public inspection of the records during the 2018 election.
6. Process for reimbursement expenditures made to the candidate or volunteers: Ms. Harting stated that as Treasurer, campaign staff, volunteers, etc. that would seek payment or reimbursement from the Campaign would need to provide her with the invoice or receipt, and that she would then confirm the request for payment with Senator Ericksen. She stated that she maintained copies of those records on file via email and/or on paper.

IV.

Audit Documents Reviewed, Provided and Respondent Correspondence

- The C-1pc reports, C-3 and C-4 reports filed by the 2018 Doug Ericksen Campaign covering the period of January 1 through December 31, 2018.
- Responses and email exchanges between PDC staff and Bruce Ayers, Treasurer for the Doug Ericksen Campaign, and Senator Ericksen.

- PDC staff queried the PDC Contribution and Expenditure database for the 2018 Doug Ericksen Campaign contribution and expenditure information covering the period of January 1 through December 31, 2018.

V.
Statutes and Rules

- **RCW 42.17A.235 and 240** require continuing political committees under the Full Reporting Option to file timely, accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the committee. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report.

Beginning June 1st for every political committees participating in an election, C-4 reports are required 21 and 7 days before each election in which the committee receives contributions or makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same time and are required to be disclosed on a C-3 report filed every Monday for monetary contributions deposited into the committee bank account the previous five business days.

- **RCW 42.17A.220** requires political committee to deposit monetary contributions received shall be deposited by political committee members, paid staff, or treasurers in a depository in an account established and designated for that purpose. Such deposits shall be made within five business days of receipt of the contribution.

Respectfully submitted this 8th day of March, 2021.

Electronically Signed Kurt Young
PDC Compliance Officer

Audit Exhibits

- Exhibit #1** Documents provided by the Campaign to the PDC on January 18, 2021, concerning the expenditures selected for audit.
- Exhibit #2** Letter from Kristi Harting, former Campaign Treasurer Documents provided by the Campaign to the PDC on January 18, 2021, concerning the campaign practices and procedures.

LITHTEX NW Printing Solutions

2000 Kentucky Street
Bellingham, WA 98229
Phone: (360) 676-1977
Fax: (360) 676-1895

Sold To:

Committee to Elect Doug Ericksen
PO Box 748
Ferndale, WA 98248

Invoice

Invoice Number:

77153

Invoice Date:

Sep 7, 2018

Sales Rep	Customer PO	Shipping Method	Payment Terms	Due Date
Shawn VanDyken		Will Call	Prepaid	9/7/18

Description	Amount
Mailer ~ 50,000 Qty	3,456.00
Typeset	85.00

Customer Resale Number

Subtotal 3,541.00
Sales Tax 308.07
Postage

We gladly accept VISA, Mastercard, Discover and American Express payments for a 2.75% convenience fee.

Total Invoice Amount 3,849.07
Payment/Credit Applied
BALANCE DUE 3,849.07

LITHTEX NW Printing Solutions

2000 Kentucky Street
Bellingham, WA 98229
Phone: (360) 676-1977
Fax: (360) 676-1895

Sold To:

Committee to Elect Doug Ericksen
PO Box 748
Ferndale, WA 98248

Invoice

Invoice Number:

77401

Invoice Date:

Sep 7, 2018

Sales Rep	Customer PO	Shipping Method	Payment Terms	Due Date
Shawn VanDyken		USPS	Prepaid	9/7/18

Description	Amount
Meet & Greet Postcard Mailer - 5 Versions ~ 51,000 Qty	2,602.00
Typeset	50.00
Mail Prep	865.00
Postage - Drop 1 - Blaine/Birch Bay - 9,798 pieces	1,528.49
Postage - Drop 2 - Lynden/Meridian - 11,207 pieces	1,748.29
Postage - Drop 3 - Sumas/Everson - 7, 913 pieces	1,364.21
Postage - Drop 4 - Ferndale - 10,219 pieces	1,594.16
Postage - Drop 5 - Bellingham - 6,323 pieces	986.39

Customer Resale Number

Subtotal 10,738.54
Sales Tax 305.98
Postage

We gladly accept VISA, Mastercard, Discover and American Express payments for a 2.75% convenience fee.

Total Invoice Amount 11,044.52
Payment/Credit Applied
BALANCE DUE 11,044.52

LITHTEX NW Printing Solutions

2000 Kentucky Street
Bellingham, WA 98229
Phone: (360) 676-1977
Fax: (360) 676-1895

Sold To:

Committee to Elect Doug Ericksen
PO Box 748
Ferndale, WA 98248

Invoice

Invoice Number:

78533

Invoice Date:

Oct 25, 2018

Sales Rep	Customer PO	Shipping Method	Payment Terms	Due Date
Shawn VanDyken		USPS	Prepaid	10/25/18

Description	Amount
Postcard - 4 Billion \$ New Taxes - Vote or Die ~ Qty 10,000	1,076.00
Mail Prep	350.00
Delivery to Seattle USPS	175.00
Typeset	85.00
Postage ~ 9,918 pieces	2,183.27

Customer Resale Number

Subtotal 3,869.27
Sales Tax 146.68
Total Invoice Amount 4,015.95

We gladly accept VISA, Mastercard, Discover and American Express payments for a 2.75% convenience fee.

Payment/Credit Applied
BALANCE DUE 4,015.95

LITHTEX NW Printing Solutions

2000 Kentucky Street
Bellingham, WA 98229
Phone: (360) 676-1977
Fax: (360) 676-1895

Sold To:

Committee to Elect Doug Ericksen
PO Box 748
Ferndale, WA 98248

Invoice

Invoice Number:

78543.1

Invoice Date:

Oct 25, 2018

Sales Rep	Customer PO	Shipping Method	Payment Terms	Due Date
Shawn VanDyken		USPS	Prepaid	10/25/18

Description	Amount
Postcard - Property Rights / Gun Rights - Vote or Die ~ Qty 10,000	968.00
Mail Prep	350.00
Delivery to Seattle USPS	175.00
Typeset	85.00
Postage ~ 9,918 pieces	2,183.27

Customer Resale Number

Subtotal 3,761.27
Sales Tax 137.29
Total Invoice Amount 3,898.56

We gladly accept VISA, Mastercard, Discover and American Express payments for a 2.75% convenience fee.

Payment/Credit Applied
BALANCE DUE 3,898.56

LITHTEX NW Printing Solutions

2000 Kentucky Street
Bellingham, WA 98229
Phone: (360) 676-1977
Fax: (360) 676-1895

Sold To:

Committee to Elect Doug Ericksen
PO Box 748
Ferndale, WA 98248

Invoice

Invoice Number:

78543

Invoice Date:

Oct 25, 2018

Sales Rep	Customer PO	Shipping Method	Payment Terms	Due Date
Shawn VanDyken		USPS	Prepaid	10/25/18

Description	Amount
Postcard - No Carbon Tax - Vote or Die ~ Qty 10,000	968.00
Mail Prep	350.00
Delivery to Seattle USPS	175.00
Typeset	85.00
Postage ~ 9,918 pieces	2,183.27

Customer Resale Number

Subtotal 3,761.27
Sales Tax 137.29
Total Invoice Amount 3,898.56

We gladly accept VISA, Mastercard, Discover and American Express payments for a 2.75% convenience fee.

Payment/Credit Applied
BALANCE DUE 3,898.56

From: Shawn VanDyken <shawnv@lithtexnw.com>
Sent: Friday, October 12, 2018 10:39 AM
To: 'Doug Ericksen'; 'Doug Ericksen'
Cc: 'Shawn VanDyken'; 'Brett Bonner'; 'B and K Bonner'
Subject: RE: Current budget with you

Doug:

Here are the approximate costs:

About Doug Tabloid (4-panel) Mailer Dropping 10/17
Qty. 30,000

Production: \$2300
Mail Prep: \$ 950
Delivery to Seattle: \$ 175
WSST: \$ 298
Subtotal: \$3723
Postage: \$6600
TOTAL: \$10,323

Compare/Contrast Dropping 10/22

Qty: 30,000
Production: \$1956
Mail Prep: \$ 950
Delivery to Seattle: \$ 175
WSST: \$ 268
Subtotal: \$3349
Postage: \$6600
TOTAL: \$9949

Vote Or Die - Version 1 Dropping 10/26

Qty: 7,500
Production: \$ 489
Mail Prep: \$ 260
Delivery to Seattle: \$ 175
WSST: \$ 80
Subtotal: \$1004
Postage: \$1650
TOTAL: \$2654

Vote Or Die - Version 2 Dropping 10/31

Qty: 7,500
Production: \$ 489
Mail Prep: \$ 260
Delivery to Seattle: \$ 175
WSST: \$ 80
Subtotal: \$1004
Postage: \$1650
TOTAL: \$2654

Compare/Contrast Hand-out Delivery 10/17
Qty. 20,000
Production: \$1474
WSST: \$ 128
TOTAL: \$1602

TOTALS:
 \$10,323
 \$ 9,949
 \$ 2,654
 \$ 2,654
 \$ 1,602

GRAND TOTAL: \$27,182

NOTE: postage amounts are only estimates. Exact amounts depend on final mail lists. I am planning on each of the mailings being brought to Seattle.

Hope this helps.

Shawn

Shawn Van Dyken
LithtexNW
2000 Kentucky Street
Bellingham, WA 98229

360-296-0135 cell

-----Original Message-----

From: Doug Ericksen <ericksendj@aol.com>
Sent: Friday, October 12, 2018 7:27 AM
To: Shawn VanDyken <shawnv@lithtexnw.com>
Subject: Current budget with you

Shawn,

Can you get me a price, as close as you can, for what I currently have going with you for the 4 Mail pieces.

Thanks

Doug Ericksen=

Cascade Radio Group Statement of Account



Statement Date: 11/12/2018
 Aged As Of: 11/12/2018
 Page: 1

Advertiser: **COMM TO ELECT DOUG ERICKSON**
PO Box 748
Ferndale, WA 98248

Transaction Number	Transaction Date	Contract Number	Station	Check Number	Net Amount	Applied Amount	Net Due
					\$2,100.00		\$0.00
IN-11809108402	09/30/2018	602530	KPUG-AM			(\$150.00)	
PA-2180834183	08/14/2018	602530	KPUG-AM	2207		(\$830.00)	
PA-2180834321	08/27/2018	602530	KPUG-AM	2208		(\$1,120.00)	
PA-2180934508	09/20/2018	602530	KPUG-AM	2218	\$1,960.00		\$0.00
IN-11809108411	09/30/2018	404838	KGMI-AM			(\$1,960.00)	
PA-2180834321	08/27/2018	404838	KGMI-AM	2208	\$560.00		\$0.00
IN-11809108413	09/30/2018	602548	KPUG-AM			(\$560.00)	
PA-2180934508	09/20/2018	602548	KPUG-AM	2218	\$280.00		\$0.00
IN-11809108415	09/30/2018	301072	KBAI-AM			(\$280.00)	
PA-2180934508	09/20/2018	301072	KBAI-AM	2218	\$1,375.00		\$0.00
IN-11810109253	10/31/2018	301072	KBAI-AM			(\$815.00)	
PA-2181034753	10/12/2018	301072	KBAI-AM	2224		(\$560.00)	
PA-2180934508	09/20/2018	301072	KBAI-AM	2218	\$1,350.00		\$0.00
IN-11810109254	10/31/2018	602530	KPUG-AM			(\$1,350.00)	
PA-2181034753	10/12/2018	602530	KPUG-AM	2224	\$8,440.00		\$0.00
IN-11810109255	10/31/2018	404838	KGMI-AM			(\$25.00)	
PA-2181034926	10/26/2018	404838	KGMI-AM	2220		(\$5,880.00)	
PA-2180934508	09/20/2018	404838	KGMI-AM	2218		(\$1,125.00)	
PA-2181034903	10/25/2018	404838	KGMI-AM	2249		(\$1,410.00)	
PA-2180834321	08/27/2018	404838	KGMI-AM	2208	\$3,080.00		\$0.00
IN-11810109256	10/31/2018	602548	KPUG-AM			(\$3,080.00)	
PA-2181034753	10/12/2018	602548	KPUG-AM	2224	\$560.00		\$0.00
IN-11811109823	11/12/2018	301072	KBAI-AM			(\$560.00)	
PA-2181034753	10/12/2018	301072	KBAI-AM	2224	\$2,880.00		\$0.00
IN-11811109824	11/12/2018	404838	KGMI-AM			(\$2,880.00)	
PA-2181034753	10/12/2018	404838	KGMI-AM	2224	\$1,600.00		\$0.00
IN-11811109825	11/12/2018	602548	KPUG-AM			(\$630.00)	
PA-2181135004	11/01/2018	602548	KPUG-AM	2257		(\$150.00)	
PA-2181034926	10/26/2018	602548	KPUG-AM	2220		(\$820.00)	
PA-2181034753	10/12/2018	602548	KPUG-AM	2224			

ck 2244 \$ 9505

0 - 30 days	31 - 60 days	61 - 90 days	91 - 120 days	121+ days	Net Due
\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

PAID

42.05 ✓
32.82 ✓

Comcast

Order Contract

Run Date: Sep 27, 2018 16:49:34
Page 1 of 3

Order Number: 11360156
 Order No: 11360156
 PO: 2497062
 Reference No:
 Contract Start: 10/01/18
 Contract End: 10/14/18
 Last Changed: 09/27/18
 Invoice Notes:

Package: N
 EDI:
 Ext Order:
 Ext Client:
 Estimate:
 Product: POLITICAL

Customer: 31846 DOUG ERICKSEN WA
 SENATE LD42
 DOUG ERICKSEN WA SENATE LD42
 PO BOX 748
 FERNDALE, WA 98248
 Brett Bommer
 (360)201-7706

Sales Office: 130LSEEA LOCAL SOUTH
 Salesperson: 130KKKimberly Gherna
 Discount: AGENCY 15%
 Revenue Type: Local Political Bundle Bill
 Invoicing Option: Individual Retail
 Bill Cycle: End of Flight
 Payment Terms: CASH IN ADVANCE
 Notarize Invoices: N
 Requires ANACAB: N
 Send Electronic Invoices: N
 Send Electronic Invoice Email Address:

Order Memo: Market: Seattle
 DMA: WHAT
 Priority Code NP=130
 See key on FCC site for zonelnetwork information

Line	Status	Req/Freq	Graph	Net	Spot/Freq	Dates	Weeks On/Off	No. Of Weeks	Purchase Time	Daypart	PRY	Inv Type	Revenue Type	Qty Type	Auto Show Inv	M T W T F S S	Total Spots	Rate	\$Total	\$Dropped
1	AP	U-WHAT	N-FXNC	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart: 09:00-16:00	130	DEFAULT	LOCPOLBD 26 /WK	L N	Y Y Y Y Y Y	Y 26.00	15.00	390.00	0.00	
2	AP	U-WHAT	N-FXNC	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart: 09:00-16:00	130	DEFAULT	LOCPOLBD 26 /WK	L N	Y Y Y Y Y Y	Y 26.00	15.00	390.00	0.00	
3	AP	U-WHAT	N-FXNC	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart: 16:00-19:00	130	DEFAULT	LOCPOLBD 20 /WK	L N	Y Y Y Y Y Y	Y 20.00	25.00	500.00	0.00	
4	AP	U-WHAT	N-FXNC	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart: 16:00-19:00	130	DEFAULT	LOCPOLBD 19 /WK	L N	Y Y Y Y Y Y	Y 19.00	25.00	475.00	0.00	
5	AP	U-WHAT	N-ESPN	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart: 16:00-19:00	130	DEFAULT	LOCPOLBD 17 /WK	L N	Y Y Y Y Y Y	Y 17.00	95.00	1,615.00	0.00	
6	AP	U-WHAT	N-ESPN	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart: 16:00-19:00	130	DEFAULT	LOCPOLBD 17 /WK	L N	Y Y Y Y Y Y	Y 17.00	95.00	1,615.00	0.00	
7	AP	U-WHAT	N-ESPN	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart: 19:00-24:00	130	DEFAULT	LOCPOLBD 26 /WK	L N	Y Y Y Y Y Y	Y 26.00	85.00	2,210.00	0.00	
8	AP	U-WHAT	N-ESPN	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart: 19:00-24:00	130	DEFAULT	LOCPOLBD 26 /WK	L N	Y Y Y Y Y Y	Y 26.00	85.00	2,210.00	0.00	

Order Contract

Line	AP	U-WHAT	N-HGTV	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	17/WK	L N	Y Y Y Y Y Y Y Y	Y 17.00	100.00	1,700.00	0.00
9	AP	U-WHAT	N-HGTV	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	17/WK	L N	Y Y Y Y Y Y Y Y	Y 17.00	100.00	1,700.00	0.00
				Copy Required	11360156															
10	AP	U-WHAT	N-HGTV	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	17/WK	L N	Y Y Y Y Y Y Y Y	Y 17.00	100.00	1,700.00	0.00
				Copy Required	11360156															
11	AP	U-WHAT	N-HGTV	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	28/WK	L N	Y Y Y Y Y Y Y Y	Y 28.00	80.00	2,080.00	0.00
				Copy Required	11360156															
12	AP	U-WHAT	N-HGTV	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	26/WK	L N	Y Y Y Y Y Y Y Y	Y 28.00	80.00	2,080.00	0.00
				Copy Required	11360156															
13	AP	U-WHAT	N-AEN	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	18/WK	L N	Y Y Y Y Y Y Y Y	Y 18.00	40.00	720.00	0.00
				Copy Required	11360156															
14	AP	U-WHAT	N-AEN	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	18/WK	L N	Y Y Y Y Y Y Y Y	Y 18.00	40.00	720.00	0.00
				Copy Required	11360156															
15	AP	U-WHAT	N-AEN	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	24/WK	L N	Y Y Y Y Y Y Y Y	Y 24.00	40.00	960.00	0.00
				Copy Required	11360156															
16	AP	U-WHAT	N-AEN	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	24/WK	L N	Y Y Y Y Y Y Y Y	Y 24.00	40.00	960.00	0.00
				Copy Required	11360156															
17	AP	U-WHAT	N-HALL	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	19/WK	L N	Y Y Y Y Y Y Y Y	Y 19.00	15.00	285.00	0.00
				Copy Required	11360156															
18	AP	U-WHAT	N-HALL	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	12/WK	L N	Y Y Y Y Y Y Y Y	Y 12.00	15.00	180.00	0.00
				Copy Required	11360156															
19	AP	U-WHAT	N-GOLF	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	21/WK	L N	Y Y Y Y Y Y Y Y	Y 21.00	5.00	105.00	0.00
				Copy Required	11360156															
20	AP	U-WHAT	N-GOLF	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	21/WK	L N	Y Y Y Y Y Y Y Y	Y 21.00	5.00	105.00	0.00
				Copy Required	11360156															
21	AP	U-WHAT	N-P12N	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	18/WK	L N	Y Y Y Y Y Y Y Y	Y 18.00	5.00	90.00	0.00
				Copy Required	11360156															
22	AP	U-WHAT	N-P12N	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	18/WK	L N	Y Y Y Y Y Y Y Y	Y 18.00	5.00	90.00	0.00
				Copy Required	11360156															
23	AP	U-WHAT	N-P12N	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	24/WK	L N	Y Y Y Y Y Y Y Y	Y 24.00	5.00	120.00	0.00
				Copy Required	11360156															
24	AP	U-WHAT	N-P12N	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	24/WK	L N	Y Y Y Y Y Y Y Y	Y 24.00	5.00	120.00	0.00
				Copy Required	11360156															
25	AP	U-WHAT	N-FS1	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	18/WK	L N	Y Y Y Y Y Y Y Y	Y 18.00	10.00	180.00	0.00
				Copy Required	11360156															
26	AP	U-WHAT	N-FS1	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	18/WK	L N	Y Y Y Y Y Y Y Y	Y 18.00	10.00	180.00	0.00
				Copy Required	11360156															
27	AP	U-WHAT	N-FS1	R-R002	10/01/18	10/07/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	24/WK	L N	Y Y Y Y Y Y Y Y	Y 24.00	10.00	240.00	0.00
				Copy Required	11360156															
28	AP	U-WHAT	N-FS1	R-R002	10/08/18	10/14/18	1 / 0	1	User	Daypart	130	DEFAULT	LOCPOLBD	24/WK	L N	Y Y Y Y Y Y Y Y	Y 24.00	10.00	240.00	0.00
				Copy Required	11360156															

Order Contract

Order Lines Total **588.00**
 Makegoods Totals **0.00**
22,260.00
0.00
0.00

Copy Information:

Order Number: 11360156
 R002 Copy Required 11360156
 Tape No. _____ Class _____ Length 30 Weight _____ Start _____
 Title _____
 Limitations: Days () _____ Time (-:-) _____

Order Summary:

Order Number: 11360156

Billing Period	Line Charges	Dropped Totals	GROSS							Agency Discount	Rep Discount	Other Discount	Net Total	Pre-Payments	Balance Due	Non-\$0 Spots	\$0 Spots	Makegood Spots	Total Spots
			Makegood Charges	Misc Time Charges	Misc Other Charges	Totals	Discount	Discount	Discount										
Oct 2018	22,260.00	0.00	0.00	0.00	0.00	0.00	22,260.00	3,338.00	0.00	0.00	18,921.00	0.00	18,921.00	588.00	0.00	0.00	0.00	588.00	
Order Total	22,260.00	0.00	0.00	0.00	0.00	0.00	22,260.00	3,338.00	0.00	0.00	18,921.00	0.00	18,921.00	588.00	0.00	0.00	0.00	588.00	

Customer Signature: _____

From: **Brett Bonner** bonnerbellingham@outlook.com
Subject: Fwd: Invoice # 78533
Date: October 25, 2018 at 8:51 PM
To: Kristi Harting kristiharting@gmail.com, Doug Ericksen ericksend@aol.com

[Get Outlook for iOS](#)

From: Shawn VanDyken <shawnv@lithtexnw.com>
Sent: Thursday, October 25, 2018 4:17:12 PM
To: 'Brett Bonner'
Cc: shawnv@lithtexnw.com
Subject: FW: Invoice # 78533

Brett:

Attached are three invoices. One for each of the Vote-or-Die cards. The production pricing for the first two is slightly lower because the bulk of them (7500 each) were done in tandem with the Compare and Contrast mailer (which has already mailed). We subsequently did smaller run of these two cards, to get the quantity of each version up to 10,000.

The "4 Billion\$ New Taxes" version was a stand-alone print run.

In any event, the grand total for all three is \$11,813.07 (all-in, including postage).

If you could get a check to me here at the plant before 6:00 that would be fantastic. Then I can sign off on the releases for mailing. First one goes tomorrow morning.

Thanks!

Shawn Van Dyken
LithtexNW
2000 Kentucky Street
Bellingham, WA 98229

360-296-0135 cell

-----Original Message-----

From: Billing <billing@lithtexnw.com>
Sent: Thursday, October 25, 2018 4:08 PM
To: 'Shawn Van Dyken' <shawnv@lithtexnw.com>
Subject: Invoice # 78533

Doug Ericksen Invoices (x3)

~ Jacki

LITHTEX NW
Printing Solutions

2000 Kentucky Street
Bellingham, WA 98229
Phone: (360) 676-1977
Fax: (360) 676-1895

Sold To:

Committee to Elect Doug Ericksen
PO Box 748

Invoice

Invoice Number:

785

CHASE

CHASE

CHASE

CHASE

CHASE

Deposit cash or checks
at most Chase ATMs.
An image of your check can
be printed on your receipt.

My Transaction Summary

Transaction #58
Account Number Ending In: 7074
Checking Deposit \$3,000.00

Further review may result in delayed
availability of this deposit

JPMorgan Chase Bank, N.A.
Main St and LaBounty, Branch 127138
1-800-935-9935

Your satisfaction matters. Share your
feedback at: chase.com/sendusfeedback

Member FDIC, Equal Housing Lender
Please keep your receipt
10/30/2018 11:10

Business Date 10/30/2018
Session #24

Thank you - Kiran
Cashbox #03

ink)

Facebook Ads Team
1601 Willow Road
Menlo Park, CA 94025
© 2018 Facebook

Page ID: 1000000000000000
Account ID: 28574336
Product ID: 1000000000000000
Billing ID: 1000000000000000
Advertiser: Michael James
Advertiser Phone: 565 993 0416
Advertiser Email: mj@noggincorp.com

Michael James
Founder - Noggin Branding & Noggin Consulting
Online Game Designer / Industry Disrupter / Noggin Expander
Noggin Branding
T: 565 993 0416
E: mj@noggincorp.com
W: www.noggincorp.com
LinkedIn: Michael James

Facebook Ads Team - ogovrta-comb@support.facebook.com
Date: Mon, 15 Oct 2018 at 8:34 AM
Reason: Your Facebook Ads Billing (Account ID: 28574336)
To: Michael James - mj@noggincorp.com

Receipt for Noggin Branding (Account ID: 28574336)

Summary

AMOUNT BILLED
\$500.00 USD

BILLING REASON
You're being billed because you reached your \$500.00 billing threshold.

DATE RANGE
Oct 16, 2018 11:00am - Oct 29, 2018 8:30am

PRODUCT TYPE
Facebook Ads

PAYMENT METHOD
Visa*0433

REFERENCE NUMBER
5VPN2JNSW2

Item	Impressions	Amount
Post: "Senator Doug Ericksen has been bringing local..."	2,663	\$42.82
[10/16/2018] Promoting https://dougerricksen.com/videos	10,244	\$139.99
Post: "Ballots are arriving in mailboxes in the 42nd..."	2,373	\$44.82
Post: "Senator Doug Ericksen has been bringing local..."	133	\$2.74
Post: "Get more information @ DougEricksen.com "	2,847	\$49.71
Post: "The Downtown Seattle socialists and out of state..."	5,316	\$49.70
Post: "Sen. Ericksen speaking at the No on the \$30..."	4,359	\$33.59
Dougs Insta ads	3,421	\$56.39
Post: "Lets go door belling and WIN this election."	992	\$20.52
Post: "Would you support a state law prohibiting local..."	1,742	\$34.03
Post: "Straight talk on eduation funding and more..."	2,627	\$25.69
CAMPAIGN TOTAL		\$500.00
TOTAL		\$500.00

Transaction ID: 1891928630924484-3815613

Thanks,
The Facebook Ads Team

[Manage Your Ads](#) [See Full Receipt](#)

Smart Foodservice®
WAREHOUSE STORES

** Welcome To Our Bellingham Store *
Store # 552

WWW.SMARTFOODSERVICE.COM

Cashier: Don

DATE 11/21/18 TIME 10:14:57

OT TERIYAKI 079694103014	12.79
CREAMR C/MA 050000246649	3.79
CREAMER C/M 050000447718	2.09
CREAMER C/M 050000447718	2.09
12OZ COMPOS 818761010578	3.73 T
12OZ COMPOS 818761010578	3.73 T
2 @ 3.00	
10-200Z HOT 818761010653	6.00 T
SUBTOTAL	34.22
Sales Tax	1.17
TOTAL	35.39
Debit	TENDER
Cash	CHANGE
	35.39
	.00

TOTAL NUMBER OF ITEMS THIS VISIT--> 8

***** Electronic Payment Activity *****
11/21/2018 10:16:20
US DEBIT Entry Method: Chip
CARD #: XXXXXXXXXXXX0433
PURCHASE - APPROVED
AUTH CODE:155001

Mode:	Issuer
AID:	A0000000980840
TVR:	8080048000
IAD:	06010A03A00000
TSI:	6800
ARC:	00
TC:	A18D687284B40664
MID: 483377 TID: 001 SEQ: 052985	
Total:	USD\$ 35.39

PIN VERIFIED
***** Electronic Payment Activity *****

10:16:25 OP# 821030210 11/21/18
Term:5 Trans # 82 Store # 552

Visit our new Website
Sign up to receive specials by email
Industry trends and money saving idea
1 (360) 676-8166

Grocery Delivery
in as little as an hour
to your home or business at
Instacart.com/Store/Cash-Carry



Bill To
Doug Ericksen

Invoice

Date	Invoice #
10/17/2018	1068

Item Code	Description	Amount
Web Media	Digital Ad Buy [Oct 19-Oct 23]	4,350.00
Web Media	Digital Ad Buy [Oct 24-Oct 30]	6,100.00
Commission Income	15% Placement Fee	1,550.00
Thank you for your business!		Total \$12,000.00
		Balance Due \$12,000.00

Please remit payment to: Minnick Group
 10700 NE 4th St. Unit 2502
 Bellevue, WA 98004



Bill To
Doug Ericksen

Invoice

Date	Invoice #
10/28/2018	1088

Item Code	Description	Amount
Web Media	Video Display Advertising [Oct 31-Nov 5]	1,800.00
Web Media	Digital Display Advertising	800.00
Commission Income	15% Placement Fee	400.00
	SALES TAX (SHIP TO: BELLEVUE RTA-1704)	0.00

Thank you for your business!	Total	\$3,000.00
	Balance Due	\$3,000.00

Please remit payment to: Minnick Group
 10700 NE 4th St. Unit 2502
 Bellevue, WA 98004

Kristi Harting 12/30/2020:

ANSWERS TO QUESTIONS:

1. Contributions - treasurer picked up mail from PO Box or from candidate, copies of checks made, checks deposited in the bank. Kristi Harting, 2018 treasurer, made most of the deposits for 2018 campaign. Others were made by candidate and copies/pics sent to treasurer. Information from the checks were entered into Orca weekly, C3 reports filed according to PDC guidelines. Online contributions thru PayPal came to treasurer via email. These were included in weekly C3 reports. Treasurer transferred funds from paypal to campaign account. Paypal fees deducted as an expense.
2. Expenditures and C4 - Brett Bonner was in charge of media for the campaign and handled all media buys/political advertising. Candidate also made expenditures. Bonner and candidate emailed receipts to the treasurer. Treasurer made few expenditures. C4 reports were completed by treasurer. Treasurer reviewed bank statement to reconcile with receipts, and if treasurer hadn't received, she would ask candidate/Brett to provide. If it was not received by time report was due, C4 was filed according to bank statement record of expenditure.
3. C3 and C4 - candidate did not review reports. Treasurer completed them and would ask for receipt/clarification if needed.
4. Campaign records - treasurer kept files on email and paper. These files include - bank statements, receipts, copies of deposited checks.
5. Inspection was not requested. Treasurer kept financial records.
6. Campaign staff paid by treasurer via invoice. The treasurer confirmed these payments with candidate. These records are on file via email and/or paper.

Kristi Harting