



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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April 12, 2021

Sent Electronically to Marty McClendon and Tom Perry, 2018 Campaign Treasurer

Subject: PDC Audit Report Cover Letter, 2018 Marty McClendon for Senate Campaign audit, PDC Audit No. 20-06

Mr. McClendon and Mr. Perry:

This letter is to inform you that PDC staff has completed the limited-scope audit of the 2018 Marty McClendon 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 verified the expenditure information disclosed on the Schedule A to C-4 reports. Staff also noted that creating a separate entry for expenditures less than \$50 in the ORCA campaign filing software or vendor software used by the Campaign was a good way to accurately document those expenses.
- 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 Marty McClendon for Senate
Campaign

Respondent.

PDC Audit No. 20-06

Audit Report

I.

Audit Scope

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

II.

Audit: Respondent Background

- On May 22, 2018, Marty McClendon filed a Candidate Registration (C-1 report) declaring his candidacy for election to the office of State Senator in the 26th Legislative District in 2018, selecting the Full Reporting Option and listing Tom Perry as the Ministerial Treasurer and the only Campaign Officer.
- On March 1, 2021, PDC staff sent an email to Marty McClendon and Tom Perry, Treasurer for the 2018 Marty McClendon Campaign, and attached a letter notifying them that staff was conducting audits of four 2018 contested Senate races as previously explained in an earlier email sent to them. The letter stated staff was conducting a limited-scope audit of the two 2018 candidates that ran for State Senator in the 26th Legislative District, which included Mr. McClendon.
- The letter requested documentation maintained by the Campaign for selected expenditures made during the 2018 election cycle, in addition to a brief narrative concerning general contribution and expenditure campaign practices, including the record keeping of the campaign books of account in order to complete the audit work.
- As noted above, the audits provide the PDC and the public with an opportunity to determine the degree of compliance with the PDC reporting requirements, thereby enhancing and strengthening the public's confidence in the campaign finance information being disclosed by filers. The audits also assist in identifying areas in the reporting of campaign contribution and expenditure activities that may suggest a need to update or revise the advice on the PDC website in the PDC online candidate manuals, and from Filer Assistance staff, and areas of potential changes in the law or amendments made to the PDC rules to further clarify a specific reporting requirement.
- The limited-scope audits consist primarily of reviewing the Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by each Campaign, and queries conducted by PDC staff of the contribution and expenditure databases on the PDC website.
- The information is reviewed to determine the 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 42.17A.235 and .240.

III. **Audit Findings**

- The 2018 Marty McClendon for Senate Campaign (Campaign) disclosed receiving a total of \$353,848.90 in contributions and \$353,848.90 in total expenditures made during the 2018 election cycle, with no cash on hand balance through May 31, 2019 on the “Final C-4 report” filed on June 10, 2019.

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

- Candidates appearing on the 2018 primary and general election ballots who selected the Full Reporting option were required to file weekly C-3 reports every Monday beginning June 1, 2018 through the date of the general election, disclosing contributions that were received and deposited the previous seven days. Prior to June 1, 2018, candidates were required to file monthly C-3 reports for deposits of campaign contributions made during the month or period covered by the C-4 report.
- RCW 42.17A.220 requires candidates to timely deposit monetary contributions received into the campaign bank account or depository within five business days of receipt.
- For the 2018 election cycle, the Campaign filed C-3 reports disclosing contributions received covering the period May 22 through December 31, 2018, that included 377 separate monetary and in-kind contributions totaling \$353,848.90.
- The Campaign’s four largest contributors in 2018 included the following political party committees and caucus political committees:
 1. Senate Republican Campaign Committee (SRCC): The Campaign disclosed receiving a total of \$86,404.89 in contributions from the SRCC during the 2018 election, which included both monetary and in-kind contributions.
 2. Washington State Republican Party (WSRP): The Campaign disclosed receiving a total of \$90,000 in contributions from the WSRP during the 2018 election cycle, which included a \$50,000 monetary contribution received on October 5, 2018, and a \$40,000 monetary contribution received on October 18, 2018.
 3. 26th Legislative District Republican Party (26th LDRP): The Campaign disclosed receiving three monetary contributions totaling \$19,700 from the 26th LDRP during the 2018 election cycle, including a \$18,500 monetary contribution received on October 14, 2018.
 4. Kitsap County Republican Party (KCRP): The Campaign disclosed receiving a total of \$9,765 in contributions from the KCRP during the 2018 election cycle, which included two monetary contributions.
 5. Pierce County Republican Party (PCRP): The Campaign disclosed receiving a \$5,000 monetary contribution from the PCRP on October 15, 2018.
- The Campaign disclosed receiving no small un-itemized monetary contributions on line 1e on the C-3 reports filed during the 2018 election.

- Based on the number of C-3 reports filed by the Campaign for the 2018 election, staff reviewed approximately every fourth C-3 report filed for contributions received and deposited beginning June 1, 2018, when the C-3 report accelerated reporting requirements began for 2018 candidates. Under that reporting requirement, C-3 reports are required to be filed every Monday for contributions received and deposited the preceding seven calendar days. The 2018 C-3 reports filed by the Campaign and reviewed by staff included the following:

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
6/7/2018	6/7/2018	Three contributions that included \$20,000 for Senate Republican CC, and two \$1,000 cont. from The Leadership Council and Cit. Alliance for a Legislative Majority.	\$22,000	6/11/2018	0
7/5/2018	7/5/2018	Five contributors including \$2,000 cont. from WA Hospitality PAC, and two \$1,000 cont. from WA Self-insurers & Ace American Insurance Co.	\$4,250	7/9/2018	0
7/10/2018	7/10/2018	One \$20,000 contribution from the Senate Republican CC.	\$20,000	7/16/2018	0
7/18/2018	7/20/2018	Two-page C-3 report listing eight contributors included a \$2,000 cont. from George Weyerhaeuser: Premera Blue Cross & Cal Portland Company.	\$9,000	7/23/2018	0
7/27 – 8/1/2018	8/3/2018	Three-page C-3 report listing \$2,000 contributions from JP Morgan Chase; BNSF Railroad; Farmers Insurance Group; & Puget Sound Energy.	\$15,875	8/6/2018	0
8/4 – 8/6/2018	8/10/2018	Five contributors including a \$2,000 cont. from WASH BANK PAC; & a \$1,000 cont. from Tesoro Companies, Inc.	\$3,280	8/13/2018	0
8/23/2018	8/27/2018	Two contributors including a \$1,000 cont. from Retail Action Council.	\$1,250	9/3/2018	0
9/14/2018	9/20/2018	Two-page C-3 report listing eight contributors included \$1,000 cont. from WA Oil Marketers; Build East PAC; & Allstate Insurance Company.	\$3,270	9/24/2018	0
9/20/2018	9/26/2018	Two-page C-3 report listing 10 contributors included \$1,000 cont. from WA Collectors & BOMA PAC of WA St.	\$4,600	10/1/2018	0
10/14/2018	10/14/2018	One \$18,500 contribution from the 26 th Legislative District Republicans.	\$18,500	10/16/2018	0
10/15 – 10/18/2018	10/19/2018	Seven contributors including a \$40,000 cont. from the WA State Republican Party; P; a \$5,000 from the Pierce County Republican Party; and a \$1,000 cont. from the 26 th LD Republicans.	\$46,085	10/22/2018	
10/29 – 10/31/2018	11/2/2018	Six contributors including a \$1,000 cont. from Pierce Co Affordable Housing Co.	\$2,500	11/5/2018	0
11/2/2018	11/7/2018	One contributor, a \$1,000 cont. from The Home Depot Inc., PAC.	\$1,000	12/10/2018	0

12/7/2018	12/7/2018	Five individual contributors that cont. between \$50 to \$250.	\$850	1/10/2019	0
Totals			\$152,460		

- PDC staff reviewed the 14 C-3 reports filed by the Campaign and listed in the chart above totaling \$152,460 which represented 43.1 percent of the \$353,848.90 in total contributions received during the 2018 election cycle. As noted in the table above, the Campaign timely filed all 14 of the C-3 reports reviewed by staff as part of this audit.
- In addition, the review verified that the Campaign timely deposited the contributions received within five business days of receipt in accordance with RCW 42.17A.220 for all 14 of the C-3 reports reviewed by staff as part of this audit.
- PDC staff downloaded the 2018 contribution database for the Campaign as a CSV file into an Excel spreadsheet, formatted and sorted the spreadsheet, and then conducted a review of the 2018 contributor information disclosed on C-3 reports. As part of that review, staff confirmed the Campaign complied with the 2018 election contribution limits, which were \$1,000 each 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 49 individuals that contributed more than \$100 to the Campaign totaling \$14,421 in contributions received.
- The C-3 report review disclosed the Campaign listed “Retired” as the Occupation for 21 individuals who contributed more than \$100, with one contributor listed as “Homemaker” and one as “Student.” Those 23 individuals contributed a total of \$7,400 to the 2018 Campaign.
- The PDC audit procedures included staff identifying contributors that made monetary contributions to the Campaign and then verifying or confirming the information disclosed for that specific contribution. For these audits, staff verified or confirmed selected contributions received by the Campaign by reviewing the expenditure reports of continuing political action committees (PAC) that were registered and required to file C-3 and C-4 reports with the PDC in CY 2018, that 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 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 C-4 report	Disclosed by Donor	Days Rec'd After Made
6/29/2018	Trucking Action Committee	\$2,000	7/9/2018	6/26/2018	C-4 report	3
7/5/2018	WA Hospitality PAC	\$2,000	7/9/2018	6/29/2018	C-4 report	7
9/17/2018	WA Food PAC	\$1,000	9/24/2018	8/30/2018	C-4 report	19
9/14/2018	Build East PAC	\$1,000	9/24/2018	8/28/2018	C-4 report	17
10/1/2018	WA Farm Bureau PAC	\$650	10/8/2018	9/24/2018	C-4 report	6
10/8/2018	Health Insurance Agents PAC	\$1,000	10/15/2018	9/21/2018	C-4 report	17
10/14/2018	26 th Legislative District Republicans	\$18,500	10/16/2018	10/15/2018	C-4 report	-1
10/14/2018	Kitsap County Republican Party	\$4,765	10/16/2018	10/16/2018	C-4 report	-2
10/15/2018	Pierce County Affordable Housing Council	\$1,000	10/22/2018	10/2/2018	C-4 report	13
10/18/2018	WA State Republican Party	\$40,000	10/22/2018	10/18/2018	C-4 report	0

- The review indicated that the Campaign received and deposited all ten of the contributions selected for review within five business days of receipt as required by statute.
- As noted in the chart above, the Campaign disclosed the contributor's names for the 10 monetary contributions from the selected PAC's within -2 to 19 days after each PAC disclosed making the contributions. Staff based that information solely on the date the expenditure for the contribution was disclosed as having been made by the PAC on the corresponding C-4 report, and the date the contribution was disclosed as having been received on the C-3 report filed by the Campaign.

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

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

6. A Post-General election C-4 report was due by December 10, 2018, covering the period October 30 through November 30, 2018.

- During 2018, the Campaign timely filed C-3 and C-4 reports throughout the year including the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports as detailed in the chart below.

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
May 18-22, 2018 C-4 report	5/22/2018	5/22/2018	\$477.76	\$477.76	One \$477.76 in-kind contribution from the candidate for the filing fee for office.	0
May 2018	6/11/2018	6/11/2018	\$1,774.29	\$1,649.29	Two in-kind contributions totaling \$1,649.29 from the Senate Republican CC for staff time.	0
2018 21-Day Pre Primary C-4 report	7/17/2018	7/17/2018	\$99,324.48	\$55,409.53	17 expenditures made to New Media NW (NM NW) totaling \$35,380.17 that included a \$15,000 expenditure on 6/20 for a Cable TV buy; consulting; a \$4,798.92 expenditure on 7/16 to Gateway Press for Direct Mail.	0
2018 7-Day Pre Primary C-4 report	7/31/2018	7/31/2018	\$32,143.44	\$53,600.42	Seven expenditures made to NMNW that included a \$20,745 expenditure on 7/18 for a Cable TV buy (7/23-7/29); a \$20,000 expenditure on 7/26 for a Cable TV buy (7/30-8/3); and two expenditures totaling \$9,098 for two Print NW mailers.	0
2018 Post-Primary C-4 report	9/10/2018	9/10/2018	\$47,291.53	\$32,450.94	Two expenditures to Jordan Gurnett totaling \$8,000 for Campaign Mngt.; 3-expenditures totaling \$4,600 to EZTV Spots for Video production; two expenditures to NMNW totaling \$4,600 for consulting and palm card.	0
2018 21-Day Pre-General C-4 Report	10/16/2018	10/16/2018	\$100,998	\$90,045.67	21 expenditures made to NMNW totaling \$67,551 that included 2- \$20,000 Cable TV buys for 10/8-	0

					10/14 & 10/15- 10/21; and a \$7,700 to Print NW for a mail piece.	
2018 7-Day Pre-General C-4 report	10/30/2018	10/30/2018	\$57,305	\$82,911.91	Ten expenditures made to NMNW totaling \$73,383 that included four Cable TV buys totaling \$60,000 for 10/22-11/4; and three expenditures to NMNW totaling \$16,033 for three print jobs with Print NW.	0
2018 Post General election C-4 report	12/9/2018	12/10/2018	\$12,531.74	\$25,769.76	Eight expenditures made to NMNW totaling \$13,024 that included three expenditures totaling \$8,400 for tracking surveys + \$3,500 for consulting.	0

- The Campaign disclosed orders placed, debts or obligations on all eight C-4 reports filed for the 2018 election cycle, which included a high of \$24,363 in orders placed listed on the 21-Day Pre-General Election C-4 report as being owed to New Media NW for two direct mail pieces and two additional print/design jobs, all with the sub-vendor Print NW.
- There was one candidate in-kind contribution/loan disclosed as having been made to the 2018 Campaign totaling \$477.76 for the candidate filing fee paid in May of 2018.
- The C-4 reports timely disclosed expenditure information for payments made to vendors using Campaign funds, largely involving political advertisements, and other miscellaneous Campaign services during the 2018 election cycle. The vendors receiving the largest Campaign expenditures during the 2018 election included the following:
 1. The Campaign made 65 expenditures to New Media NW totaling \$248,288 for services that included Cable TV buys, mail pieces, fund raising letters, graphic design work, tracking surveys/polling and consulting as detailed below:
 - Nine expenditures totaling \$155,745 for Cable TV advertising buys covering the period 7/16 through 11/4/2018.
 - 16 expenditures totaling \$27,001 for printing and mailing direct mail political advertisements and identifying Print NW as the sub-vendor.
 - Six expenditures totaling \$22,242 for consulting services.
 2. The Campaign made 11 expenditures to EZTV Spots totaling \$13,810 during the 2018 election for video production.
 3. The Campaign made 18 expenditures totaling \$12,145 to ten individuals for canvassing.
 4. The Campaign made 15 expenditures totaling \$8,365 to Facebook for online advertising.

- As part of the audit, PDC staff requested the Campaign provide copies of the books of accounts maintained for the expenditures listed below that were made by the 2018 Campaign including supporting documentation such as invoices, receipts, cancelled checks, notes, emails, etc.
- On March 15, 2021, the Campaign sent an email to the PDC with several attachments providing the requested the books of account documentation for the expenditures listed in the Audit letter, and a response letter concerning the campaign practices, and other staff questions. 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 copies of the books of account information provided by the Campaign for the selected campaign expenditures, were reviewed by staff for the expenditures as listed below and included the following (**Audit Exhibit #1**):
 1. Three expenditures were made to New Media Northwest totaling \$60,000 for three Cable TV advertising buys that included a \$20,000 expenditure made on October 18, 2018 for advertising 10/22-28/2018; a \$20,000 expenditure made on October 12, 2018 for advertising 10/15-21/2018; and a \$20,000 expenditure made on October 24, 2018 for advertising 10/29-11/4/2018. The documentation provided by the Campaign included copies of:
 - New Media NW Invoice #2018-5171 made out to the Friends of Marty McClendon totaling \$20,000, listing the Date as October 16, 2018, with the payment terms stated as “Payment Due by 10:00 am Thursday, October 18, 2018.” The description field of the invoice stated, “TV Advertising: PCA – WO# 6016, Placement: October 22, 2018 - October 28, 2018” and the bottom of the invoice contained the statement “paid 10/18/2018 wired.”
 - New Media NW: Invoice #2018-5144 made out to the Friends of Marty McClendon totaling \$15,000, listing the Date as October 10, 2018, with the description field stating, “TV Advertising: PCA – WO# 6015, Placement: October 15, 2018 - October 21, 2018.” The bottom of the invoice contained the statement “wired 10/12/2018.”
 - New Media NW: Invoice #2018-5147 made out to the Friends of Marty McClendon totaling \$5,000, listing the Date as October 11, 2018, with the description field stating, “TV Advertising: Additional; Media - PCA, October 15, 2018 - October 21, 2018.” The bottom of the invoice contained the statement “wired 10/12/2018.”
 - New Media NW: Invoice #2018-5202 made out to the Friends of Marty McClendon totaling \$20,000, listing the Date as October 22, 2018, with the description field stating, “TV Advertising: PCA – WO# 6017, Placement: October 29, 2018 – November 4, 2018.” The bottom of the invoice contained the statement “wired 10/24/2018.”
 2. Three expenditures were made to New Media Northwest totaling \$24,497.84 and listing Gateway in the description field of the C-4 report as the sub-vendor for printing “Mail Piece and Postage” that included a \$7,700 expenditure made on 10/18/2018.

A \$7,700 expenditure made on 10/5/2018; and two expenditures made to Print NW on July 24, 2018 for \$4,798.92 and \$4,298.92. The documentation provided by the Campaign included copies of:

- New Media NW Invoice #2018-5150 made out to the Friends of Marty McClendon totaling \$8,150, listing the Date as October 11, 2018, with the description field stating “Printing: Too Conservative Mailer – WO# 4005, Printing & Mailing: Qty. 19,329 PNW” (Print NW) for \$7,700 and “Graphic Design: Rise” \$450 and the bottom of the invoice contained the statement “wired 10/18/2018.”
 - Campaign check #2044 dated October 5, 2018, made out to New Media NW for a total of \$7,700, and signed by Tom Perry, and a copy of a New Media NW Invoice #2018-5089 made out to the Friends of Marty McClendon totaling \$7,700 listing the Date as October 3, 2018, with the description field stating “Printing & Mailing: Mailer #1 Contrast – PNW WO# 4001, Qty. 19,329” for \$7,700 and the bottom of the invoice contained the statement “wired 10/15/2018, check #2044.”
 - Campaign check #1045 dated July 24, 2018, made out to New Media NW for a total of \$10,097.84, and signed by Tom Perry, and included in the Memo or For line “Inv. 4925/4929” and: (1) A New Media NW Invoice #2018-4925 made out to the Friends of Marty McClendon totaling \$5,298.92 listing the Date as July 18, 2018, with the description field stating “Printing: Family Mailer #2 - Gateway WO# 7035” totaling \$4,798.92, with the “Mail Date: July 23, 2018 - Qty. 9,256, Graphic Design: Mailer #2 – Rise (WO# 7035)” for \$500 and the bottom of the invoice contained the statement “paid 7/24/2018, check #1045”; and (2) New Media NW Invoice #2018-4929 made out to the Friends of Marty McClendon totaling \$4,298.92 listing the Date as July 20, 2018, with the description field stating “2nd Amendment Letter - PNW (WO# 7039) Print, Mail and Postage, Graphic Design: 2nd Amendment Letter – Rise (WO# 7039)” for \$500 and the bottom of the invoice contained the statement “paid 7/24/2018, check #1045”
3. Three expenditures were made to New Media Northwest totaling \$14,701.59 and listing Gateway in the description field as the sub-vendor for a \$7,302.67 expenditure made on 10/18/2018 for “Letter Printing and Design”; a \$4,798.92 expenditure made on 7/16/2018 to print “Direct Mail”; and a \$2,600 expenditure made on November 6, 2018 for a “Tracking Survey.” The documentation included copies of:
- New Media NW Invoice #2018-5170 made out to the Friends of Marty McClendon totaling \$7,302.67 listing the Date as October 15, 2018, with the description field of the invoice stating “Printing: Lyn Letter - Gateway WO# 8409, Printing - Qty.12,177” totaling \$7,252.67, “Graphic Design \$50” and the bottom of the invoice contained the statement “wired 10/18/2018.”
 - Campaign check #1042 dated July 16, 2018, made out to New Media NW for a total of \$4,798.92, and signed by Tom Perry, and a New Media NW Invoice #2018-4922 made out to the Friends of Marty McClendon totaling \$4,798.92 listing the Date as July 16, 2018. The description field of the invoice stated, “Direct Mail: Mailer #1 Qty. 9,256 - Gateway WO# 7015” and the bottom of the invoice contained the statement “paid 7/16/2018, check #1042.”

- Campaign check #2064 dated November 6, 2018, made out to New Media NW for a total of \$2,600, and signed by Tom Perry; and a New Media NW Invoice #2018-5250 made out to the Friends of Marty McClendon totaling \$2,600 listing the Date as October 31, 2018, with the description field stating “Tracking Survey” and the bottom of the invoice contained the statement “paid 11/6/2018, check #2064.”
4. Four expenditures were made to John Kilpatrick totaling \$6,250 for canvassing that included \$2,250 on 11/6/18; \$1,500 on 10/5/2018; \$1,500 on 8/31/2018; and \$1,000 on 8/7/2018. The documentation included copies of:
- Campaign check #2070 dated November 6, 2018, made out to John Kilpatrick for a total of \$2,250, and signed by Tom Perry; and Invoice #1 made out to the Friends of Marty McClendon totaling \$2,250 listing the Date as November 2, 2018, with the description stating “Canvassing” stating “Ship to John Kilpatrick” and the bottom of the invoice contained the statement “paid 11/6/2018, check #2070.”
 - Campaign check #2035 dated October 5, 018, made out to John Kilpatrick for a total of \$1,500, and signed by Tom Perry; and Invoice #1 made out to the Friends of Marty McClendon totaling \$1,500 listing the Date as October 1, 2018, with the description stating “Canvassing” stating “Ship to John Kilpatrick” and the bottom of the invoice contained the statement “paid 10/5/2018, check #2035.”
 - Campaign check #2013 dated August 31, 2018, made out to John Kilpatrick for a total of \$1,500, and signed by Tom Perry; and Invoice #1 made out to the Friends of Marty McClendon totaling \$1,500 listing the Date as August 30, 2018, with the description stating “Canvassing” stating “Ship to John Kilpatrick” and the bottom of the invoice contained the statement “paid 8/31/2018, check #2013.”
 - Campaign check #1049 dated August 7, 2018, made out to John Kilpatrick for a total of \$1,000, and signed by Tom Perry; and Invoice #1 made out to the Friends of Marty McClendon totaling \$1,000 listing the Date as July 30, 2018, with the description stating “Canvassing” stating “Ship to John Kilpatrick” and the bottom of the invoice contained the statement “paid 8/7/2018, check #1049.”
5. Four expenditures totaling \$3,000 were made to Facebook between October 1 through 24, 2018 for Online Advertising that included \$750 on 10/1/18; \$750 on 10/9/2018; \$750 on 10/17/2018; and \$750 on 10/24/2018.
- The documentation provided by the Campaign included a copy of a printout from an accounting program or spreadsheet totaling \$3,000 and included a column with information stating four “Debit Purchase VISA Facebk” were made to Facebook by the Campaign on October 1, 2018 (\$750) ; October 9, 2018 (\$750); October 17, 2018 (\$750); and October 24, 2018 (\$750).
6. One expenditure totaling \$365.76 was made for “Expenses of \$50 or less.”
- The documentation for the \$365.76 expenditure included a copy of printout from the campaign finance software check used by the Campaign of Expenditures made of \$50 or less for the period November 1 through 30, 2018.

- The expenditures included expenditures for meals, beverages and food for volunteers, and other Campaign related expenditures made directly to vendors for postage, gas, moving straps, supplies for ballot rehab, truck rental and dump fees.
- 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.
- On March 15, 2021, the Campaign sent an email that included an attached memorandum to PDC staff providing the requested information concerning campaign practices, internal compliance controls, procedures for processing and reporting contribution and expenditure activities. **Audit Exhibit #2.** The memorandum was from Tom Perry, 2018 Campaign Treasurer, providing the information as detailed below.

2018 Contribution Process

- The Campaign stated that monetary contributions were received at the campaign mailing address, which was a rented personal mailbox, and that Mr. McClendon as the candidate would on occasion receive contributions in person at events, fundraisers, etc. The contributions would be mailed to Mr. Perry's home, where he would make copies of the checks, prepare them for deposits, and then take them to the bank for deposit in the campaign bank account. Mr. Perry would make the deposit within one or two days of receiving the contributions "in order to ensure that they were in the bank within 5 business days after Marty received them."
- Mr. Perry would then prepare the C-3 reports, either later in the week or during the weekend, and then file the C-3 reports on Mondays, the required filing date for C-3 reports after June 1, 2018. The Campaign's online contributions "were processed using Anedot. Every week or so, depending on the activity level, Tom created an export Excel file of the transactions, and initiated a withdrawal of the funds to the bank." The contribution was also entered into the ISP database before filing the C-3 report.

2018 Expenditure Process

- The Campaign had two expenditure processes during the 2018 election, with one that included Mr. McClendon using a Campaign debit card to make small campaign-related purchases. Mr. Perry stated that he reviewed the description provided by viewing the online banking information to obtain the expenditure information, and if more information was needed, he would ask Mr. McClendon.
- For the larger Campaign expenditures made for political advertising, signs, etc. those expenditures were authorized, approved, and made by the candidate and were typically done "in coordination with his consultant, Chuck Adams of New Media Northwest." The larger expenditures involved the invoices being emailed to Mr. Perry, who would then write a check and make the required expenditure to the vendor or consultant. He stated that depending on the vendor, sometimes "wire transfers were made instead of checks."

- Mr. Perry entered the expenditure description information into the campaign finance software for the C-4 reports, and he would use the information included on the invoices to enter the expenditure details, and “if there were any questions he would email or text Marty asking for more information.” Concerning the disclosure of orders placed, Mr. Perry would note that as a C-4 report deadline was approaching, he would ask Mr. McClendon “if he knew of any outstanding orders placed for which he has not been made aware of or seen an invoice for.”

2018 Campaign Review/Filing of C3 and C4 reports

- Mr. Perry filed the Campaign C-3 reports, and if there was any contributor information missing such as the employer/occupation information, he would email or text Mr. McClendon to obtain additional contributor information. Concerning the C-4 reports, once Mr. Perry clarified any expenditure issue/questions he had with Mr. McClendon, he would then file the C-4 reports on the required filing date. He added that Mr. McClendon “did not review the reports before they were filed.”

2018 Campaign Records/Books of Account

- The contribution records maintained by Campaign included copies of all contribution checks or written instruments that “were stapled into deposit batches. Contributions by credit card were saved in an Excel file.” The expenditure records maintained included copied of every check that was used to pay vendors and consultants was stapled to a copy of the invoice. Mr. Perry stated that once the expenditure information had been “entered into the ORCA all of these were filed in the McClendon file in Tom’s office.”
- The Campaign reiterated what they described above that all the campaign records were maintained and stored in Mr. Perry’s office.
- These 2018 Campaign records were available for public inspection at Mr. Perry’s office, but that the Campaign did not receive a request to inspect the records.
- The 2018 Campaign had no reimbursements made to the candidate or campaign staff.

IV.

Audit Documents Reviewed, Provided and Respondent Correspondence

- C-1 reports, C-3 reports, and C-4 reports filed by the 2018 Marty McClendon for Senate Campaign covering the period of May 22 through December 31, 2018.
- Email exchanges between PDC staff and Tom Perry, Treasurer on behalf of the 2018 Marty McClendon for State Senate Campaign.
- PDC staff queried the PDC Contribution and Expenditure database for the 2018 Marty McClendon for State Senate Campaign contribution and expenditure information covering the period of May 22 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 April 2021.

Electronically Signed Kurt Young
PDC Compliance Officer

Audit Exhibits

- Audit Exhibit #1** Documents provided by the 2018 Marty McClendon for Senate Campaign to the PDC on March 15, 2021, concerning the expenditures selected for audit.
- Audit Exhibit #2** Letter/memorandum from Tom Perry, Treasurer for 2018 Marty McClendon for Senate Campaign emailed to the PDC on March 1, 2021, concerning the campaign practices and procedures.



1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
10/16/2018	2018-5171

Terms	Job No.

Description	Amount
TV Advertising: PCA - WO# 6016 Placement: October 22, 2018 - October 28, 2018 *Payment Due by 10:00am Thursday, October 18, 2018	20,000.00

Total	\$20,000.00
Payments/Credits	\$0.00
Balance Due	\$20,000.00

Thank you for your business.

*paid 10/18/18
wared*



1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
10/10/2018	2018-5144

Terms	Job No.

Description	Amount
TV Advertising - WO# 6015 Placement: October 15, 2018 - October 21, 2018	15,000.00
Total \$15,000.00	
Payments/Credits \$0.00	
Balance Due \$15,000.00	

Thank you for your business.

wired 10/21/18



1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
10/11/2018	2018-5147

Terms	Job No.

Description	Amount
TV Advertising: Additional Media - PCA October 15, 2018 - October 21, 2018	5,000.00
Total	\$5,000.00

Thank you for your business.

Payments/Credits	\$0.00
Balance Due	\$5,000.00



wired 10/12/18



1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
10/22/2018	2018-5202

Terms	Job No.

Description	Amount
TV Advertising: PCA - WO# 6017 Placement: October 29, 2018 - November 4, 2018	20,000.00

	Total	\$20,000.00
	Payments/Credits	\$0.00
	Balance Due	\$20,000.00

Thank you for your business.

wired 10/24/18



1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
10/11/2018	2018-5150

Terms	Job No.

Description	Amount
Printing: Too Conservative Mailer - WO# 4005	
Printing & Mailing: Qty. 19,329 - PNW	7,700.00
Graphic Design: Rise	450.00

	Total	\$8,150.00
Thank you for your business.	Payments/Credits	\$0.00
	Balance Due	\$8,150.00

wired 10/18/18
CO



1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
10/3/2018	2018-5089

Terms	Job No.

Description	Amount
Printing & Mailing: Mailer # 1 Contrast - PNW WO# 4001 Qty. 19,329	7,700.00

Total	\$7,700.00
Payments/Credits	\$0.00
Balance Due	\$7,700.00

Thank you for your business.

*paid 10/5/18
chk # 2044*


FRIENDS OF MARTY MCCLENDON
5500 OLYMPIC DR STE H105 PMB 173
GIG HARBOR, WA 98335

2044

19-10/1250

10/5/18

Date

Pay to the Order of New Media Northwest \$ 7700.00
Seven Thousand Seven Hundred and ^{no} /₁₀₀ — ollars  Photo Safe Deposit
Circle on back

US BANK

For





1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
7/18/2018	2018-4925

Terms	Job No.

Description	Amount
Printing: Family Mailer #2 - Gateway (WO# 7035)	4,798.92
Printing, Mail Sort, Mail Setup, Postage & Handling Mail Date: July 23, 2018 - Qty. 9256	0.00
Graphic Design: Mailer #2 - Rise (WO# 7035)	500.00

Total	\$5,298.92
Payments/Credits	\$0.00
Balance Due	\$5,298.92

Thank you for your business.


*paid 7/24/18
chk # 1045*

MARTIN V MCCLENDON
DBA FRIENDS OF MARTY MCCLENDON
7818 71ST AVE NW
GIG HARBOR, WA 98335-6664

56-10/1250

1045

7/24/18
date

Pay to the order of New Media Northwest \$10,097.84
Ten Thousand Ninety Seven and $\frac{84}{100}$ dollars  Security Features
included
only on Bank

usbank. All of us serving you®

for Inv 4925/4929

 RP



1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
7/20/2018	2018-4929

Terms	Job No.

Description	Amount
2nd Amendment Letter - PNW (WO# 7039) Print, Mail and Postage	4,298.92
Graphic Design: 2nd Amendment Letter - Rise (WO# 7039)	500.00
Total	\$4,798.92

Thank you for your business.

Payments/Credits	\$0.00
Balance Due	\$4,798.92

*paid 7/24/18
chk # 1045*

MARTIN V MCCLENDON
DBA FRIENDS OF MARTY MCCLENDON
7818 71ST AVE NW
GIG HARBOR, WA 98335-6664

56-10/1250

1045

7/24/18
Date

Pay to the order of New Media Northwest \$10,097.84
Ten Thousand Ninety Seven and ⁸⁴/₁₀₀ *dollars*

Security Features
Check the Back.

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for INV 4925/4929

[Signature] MP

[Redacted]



1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
10/15/2018	2018-5170

Terms	Job No.

Description	Amount
Printing: Lyn Letter - Gateway (WO# 8409)	
Printing - Qty. 12, 177	7,252.67
Graphic Design	50.00

Total	\$7,302.67
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Thank you for your business.

Payments/Credits	\$0.00
-------------------------	--------

Balance Due	\$7,302.67
--------------------	------------

wired 10/18/18



1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
7/16/2018	2018-4922

Terms	Job No.

Description	Amount
Direct Mail: Mailer #1 Qty. 9256 - Gateway (WO# 7015)	4,798.92

Total	\$4,798.92
Payments/Credits	\$0.00
Balance Due	\$4,798.92

Thank you for your business.

*paid 7/16/18
chk #1042*

MARTIN V MCCLENDON
DBA FRIENDS OF MARTY MCCLENDON
7818 71ST AVE NW
GIG HARBOR, WA 98335-6664

56-10/1250

1042

7/16/18
Date

Pay to the order of New Media Northwest \$ 4798.92
Four thousand Seven Hundred Ninety Eight & ⁹²/₁₀₀ dollars

Security Features
Inventory
Details on Back

usbank. All of us serving you®

for _____ *J. P.* _____ MP



1495 Commercial St. NE
Salem, OR 97301

Invoice

Bill To
Friends of Marty McClendon 5500 Olympic Dr. NW, PMB 173 Gig Harbor, WA 98335

Date	Invoice #
10/31/2018	2018-5250

Terms	Job No.

Description	Amount
Tracking Survey	2,600.00

Total	\$2,600.00
Payments/Credits	\$0.00
Balance Due	\$2,600.00

Thank you for your business.

*paid 11/6/18
chq # 2064*

FRIENDS OF MARTY MCCLENDON
5500 OLYMPIC DR STE H105 PMB 173
GIG HARBOR, WA 98335

2064

19-10/1250

11/6/18

Date

Pay to the Order of New Media Northwest \$ 2600.00
Two Thousand Six Hundred and $\frac{00}{100}$ Dollars

Dollars



Photo Safe Deposit

US BANK

For _____

[Handwritten Signature]

RP

FRIENDS OF MARTY MCCLENDON
5500 OLYMPIC DR STE H105 PMB 173
GIG HARBOR, WA 98335

2070

19-10/1250

11/6/18

Date

Pay to the
Order of

John Kilpatrick

\$ 2250.00

Two Thousand Two Hundred Fifty and $\frac{00}{100}$

Dollars



Photo
Safe
Deposit

US BANK

For

John P. [Signature]

MP

08.30.2018

Invoice No. 1

To
Marty McClendon
For State Senate

Ship To
John Kilpatrick

Quantity	Description	Unit Price	Total
	Canvassing		\$1500.00
Total Due			\$1500.00

*paid 8/31/18
chk #2013*

FRIENDS OF MARTY MCCLENDON
5500 OLYMPIC DR STE H105 PMB 173
GIG HARBOR, WA 98335

2013

19-10/1250

8/31/18

Date

Pay to the
Order of

John Kilpatrick

\$ 1500.00

One Thousand Five Hundred and $\frac{00}{100}$

Hollars



Photo
Safe
Deposit
Check

US BANK

For

Jan P. [Signature]

[Redacted]

07.30.2018

Invoice No. 1

To
Marty McClendon
For State Senate

Ship To
John Kilpatrick

Quantity	Description	Unit Price	Total
	Canvassing		\$1000.00
Total Due			\$1000.00

paid 8/7/18
chk #1049

MARTIN V MCCLENDON
DBA FRIENDS OF MARTY MCCLENDON
7818 71ST AVE NW
GIG HARBOR, WA 98335-6664

56-10/1250

1049

8/7/18
Date

Pay to the order of John Kilpatrick \$ 1000.00
One Thousand and $\frac{00}{100}$ *dollars*

Security Features
Included
Details on Back.

usbank. All of us serving you®

for _____ *John D.* _____ NP

10/1/2018	DEBIT	DEBIT PURCHASE -VISA FACEBK QSJWEHWWV650-5434800 CA	(\$750.00)
10/9/2018	DEBIT	DEBIT PURCHASE -VISA FACEBK RR2CJHJXV650-5434800 CA	(\$750.00)
10/17/2018	DEBIT	DEBIT PURCHASE -VISA FACEBK A4EMBSXV650-5434800 CA	(\$750.00)
10/24/2018	DEBIT	DEBIT PURCHASE -VISA FACEBK D4QGVHSWV650-5434800 CA	(\$750.00)
			(\$3,000.00)

DATE	NAME	DESCRIPTION	AMOUNT
11/1/2018	WENDY'S	Food & drinks	\$17.42
11/2/2018	COSTCO	Food for volunteers	\$32.39
11/2/2018	USPS	Postage	\$24.70
11/5/2018	USPS	Postage	\$21.50
11/7/2018	PAPA JOHN'S PIZZA	Food for volunteers	\$38.50
11/9/2018	ACE HARDWARE	Moving straps	\$19.52
11/13/2018	FRED MEYER	Food for volunteers	\$40.89
11/13/2018	STARBUCKS	Food & drinks	\$36.78
11/13/2018	FRED MEYER	Food for volunteers	\$2.16
11/15/2018	TARGET	Supplies for ballot rehab	\$7.14
11/19/2018	SAFEWAY	Food for volunteers	\$43.95
11/19/2018	SAFEWAY	Gas	\$31.59
11/19/2018	SAFEWAY	Food for volunteers	\$5.41
11/23/2018	ENTERPRISE RENT-A-CAR	Truck rental	\$11.20
11/28/2018	PIERCE COUNTY REFUSE	Dump fee	\$32.61
			\$365.76

2018 General Campaign Practices – Marty McClendon

Below are explanations requested describing the general campaign practices during the 2018 Marty McClendon campaign for state senate.

Contribution Process

Contributions by check or cash were mailed to the campaign mailing address, which was a rented personal mailbox. Marty also occasionally collected checks or cash in person at events, fundraisers, etc. These checks and cash were mailed to Treasurer Tom Perry's home. Tom prepared the deposits, then made copies of the checks. These deposit batches were put aside, to be entered into ORCA at a later time. Tom then drove to the bank to make the deposit. Deposits were made within a day or two of being received in order to insure that they were in the bank within 5 business days after Marty received them. The C3s were typically prepared late in the week or over the weekend, then filed on Mondays. Online credit card contributions were processed using Anedot. Every week or so, depending on the activity level, Tom created an export Excel file of the transactions, and initiated a withdrawal of the funds to the bank. These were also entered into ORCA before filing the C3 on Mondays.

Expenditure Process

Marty carried a debit card for making small purchases. Large expenditures such as advertising, signs, etc. were made by Marty, usually in coordination with his consultant, Chuck Adams of New Media Northwest. Invoices for large expenditures were emailed to Tom, who then wrote a check and mailed it to the vendor. Sometimes wire transfers were made instead of checks. When entering expense descriptions for the C4s, Tom used the information from the invoices, and if there were any questions he would email or text Marty asking for more information. For the debit card expenses, sometimes the description in online banking explained what was purchased. For the unclear ones, Tom also asked Marty for more information. For orders placed, when the filing deadline approached, Tom would ask Marty if there was anything that had been ordered that he hadn't seen an invoice for.

Reviewing and Filing C3 and C4 reports

The C3 reports were filed by Tom, and if there was any employer/occupation information missing Tom would email or text Marty to get more information. Since the expenditure information had already been clarified by Marty if there were questions, Tom would file the C4s on the due date. Marty did not review the reports before they were filed.

Campaign Records

For contributions by check or cash, copies were made of all the checks, and these were stapled into deposit batches. Contributions by credit card were saved in an Excel file. For expenditures paid for by check, a copy of the check was stapled to a copy of the invoice. After being entered into ORCA all of these were filed in the McClendon file in Tom's office.

Campaign Books of Account

As described above, all of the campaign records were filed in Tom's office. These campaign records were available for inspection, but no request for inspection was made.

Reimbursements

There were no reimbursements made to campaign staff or volunteers during the 2018 campaign.