

State of Washington PUBLIC DISCLOSURE COMMISSION

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July 19, 2021

Sent Electronically to Representative Dave Paul, and Jay Petterson, 2020 Ministerial Campaign Treasurer

Subject: PDC Audit Report Cover Letter, 2020 Dave Paul for State Representative Campaign, PDC Audit No. 20-13

Representative Paul and Mr. Petterson:

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

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

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

Sincerely,

Endorsed by:

s/

s/_____ Electronically Signed Kurt Young, PDC Compliance Officer

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

PDC Audit No. 20-13

2020 Dave Paul for State Representative Campaign

Respondent.

Audit Report

I. <u>Audit Scope</u>

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

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

II. Audit: Respondent Background

- On January 29, 2019, Dave Paul filed a Candidate Registration (C-1 report) declaring his candidacy for election to the office of State Representative in the 10th Legislative District, Position #2 in 2020, selecting the Full Reporting Option and listing Jay Petterson, 2020 Ministerial Campaign Treasurer, and Annie Lindsey as Deputy Treasurer.
- On May 3, 2021, PDC staff sent an email to Representative Paul and Mr. Petterson, Ministerial Treasurer for the 2020 Dave Paul Campaign, and attached a letter notifying them that staff was conducting audits of four 2020 contested State Representative races as previously explained in an earlier email sent to both of them. The letter stated staff was conducting a limited-scope audit of the two 2020 candidates that ran for State Representative, Position #2 in the 10th Legislative District, which included Representative Paul.
- The letter requested documentation maintained by the Campaign for selected expenditures made during the 2020 election cycle, in addition to a brief narrative concerning general contribution and expenditure campaign practices, including the record keeping of the campaign books of account in order to complete the audit work.
- As noted above, the audits provide the PDC and the public with an opportunity to determine the degree of compliance with the PDC reporting requirements, thereby enhancing, and strengthening the public's confidence in the campaign finance information being disclosed by filers. The audits also assist in identifying areas in the reporting of campaign contribution and expenditure activities that may suggest a need to update or revise the advice on the PDC website in the PDC online candidate manuals, and from Filer Assistance staff, and areas of potential changes in the law or amendments made to the PDC rules to further clarify a specific reporting requirement.
- The limited-scope audits consist primarily of reviewing the Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by each Campaign, and queries conducted by PDC staff of the contribution and expenditure databases on the PDC website.
- The information is reviewed to determine the Campaigns timeliness and accuracy in disclosing contribution and expenditure activities undertaken on the C-3 and C-4 reports in accordance with the reporting requirements found in RCW 42.1A.235 and .240.

III. <u>Audit Findings</u>

• The 2020 Dave Paul for State Representative Campaign (Campaign) disclosed receiving a total of \$439,519.22 in contributions that included \$4,008.50 in funds carried forward from 2018, and \$433,514.44 in total expenditures made during the 2020 election cycle, with a cash on hand balance of \$6,504.78.

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

- Candidates appearing on the 2020 primary and general election ballots who selected the Full Reporting option were required to file weekly C-3 reports every Monday beginning June 1, 2020 through the date of the general election, disclosing contributions that were received and deposited the previous seven days.
- Prior to June 1, 2020, candidates were required to file monthly C-3 reports for deposits of campaign contributions made during the month or period covered by the C-4 report.
- RCW 42.17A.220 requires candidates to timely deposit monetary contributions received into the campaign bank account or depository within five business days of receipt.
- For the 2020 election cycle, the Campaign filed reports disclosing 1,027 separate monetary and in-kind contributions received during the period covering January 26, 2019 through December 31, 2020, totaling \$435,510.72. The largest contributors to the 2020 Campaign included the following:
 - 1. 13 monetary and in-kind contributions totaling of \$93,646.63 were received from the House Democratic Campaign Committee (HDCC) during the 2020 election, that included a \$75,000 monetary contribution received on September 25, 2020.
 - 16 monetary and in-kind contributions totaling \$74,228.94 were received from the Washington State Democratic Central Committee (WSDCC) during the 2020 election that included a \$30,000 monetary contribution received on October 8, 2020, and four in-kind contributions for WSDCC mailings made between October 14 through 26, 2020.
 - 3. Two contributions totaling \$23,181.25 were received from the Washington Senate Democratic Campaign, that included a \$20,000 monetary contribution received on October 5, 2020, and a \$3,181.25 in-kind contribution that was received on September 14, 2020.
 - 4. Five monetary contributions totaling \$15,650 were received from the 10th Legislative District Democrats, that included a \$9,500 monetary contribution received on October 12, 2020.
 - 5. Two monetary contributions totaling \$6,880 were received from the Skagit County Democratic Party, that included a \$5,380 monetary contribution received on October 12, 2020.
- The Campaign disclosed receiving small un-itemized monetary contributions on 74 C-3 reports filed during the 2020 election totaling \$3,336.92.

• Based on the number of C-3 reports filed by the Campaign for the 2020 election, staff reviewed approximately every fourth C-3 report filed for contributions received and deposited beginning June 1, 2020, when the C-3 report accelerated reporting requirements began for 2020 candidates. Under that reporting requirement, C-3 reports are required to be filed every Monday for contributions received and deposited the preceding seven calendar days. The 2020 C-3 reports filed by the Campaign and reviewed by staff included the following:

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
6/7 – 6/10/2020	6/10/2020	Two-page C-3 report with seven contributors that included a \$1,000 contribution from an individual.	\$1,505	6/11/2020	0
6/18/2020	6/18/2020	Two-page C-3 report with six contributors that included a \$1,000 cont's. from WA Machinists Council, IBEW Local #191 Union, and UFCW 21 PAC.	\$4,142	6/19/2020	0
6/26/2020	6/26/2020	Two-page C-3 report with six contributors that included a \$1,000 cont. from WA Conservation Voters and WA School Principals.	\$2,600	6/29/2020	0
7/9/2020	7/9/2020	One-page C-3 report with five contributors that included a \$1,000 cont. from WA State Auto Dealers.	\$1,675	7/11/2020	0
7/21/2020	7/21/2020	Two-page C-3 report with seven contributors that included a \$1,000 cont. from Muckleshoot Indian Tribe.	\$2,800	7/21/2020	0
7/28/2020	7/28/2020	One-page C-3 report with five contributors that included a \$1,000 cont. from the Kalispell Tribe and WA State Building and Construction Trades.	\$3,250	7/30/2020	0
7/30 – 8/3/2020	8/3/2020	One-page C-3 report with three contributors that included a \$2,000 cont. from the Pacific NW Regional Council of Carpenters.	\$2,270	8/4/2020	0
8/18/2020	8/20/2020	Two-page C-3 report with eight contributors that included a \$1,000 cont. from Stewardship PAC, Swinomish Tribe, and Denny Heck for Congress.	\$4,100	8/21/2020	0
8/24 – 8/26/2020	8/26/2020	Two-page C-3 report with six contributors that included a \$1,000 contribution from an individual.	\$1,500	8/31/2020	0
9/2/2020	9/2/2020	Two-page C-3 report with six contributors that included a \$1,000 contribution from AFT Washington COPE, and Iron Workers District Council.	\$4,100	9/8/2020	0
9/15/2020	9/15/2020	Two-page C-3 report with eight contributors that included a \$1,000 contribution from Children's Campaign Fund, Retired Public Employees of WA, WA State Building & Trades Council, WA State School Retirees, and an individual	\$5,750	9/18/2020	0
9/17/2020	9/17/2020	Two-page C-3 report with eight contributors that included a \$2,000 contribution from the 10 th District Democrats, and a \$1,000 cont. from IBEW Local #191 and an individual.	\$5,450	9/18/2020	0
9/25/2020	9/25/2020	Two-page C-3 report with eight contributors that included a \$75,000 contribution from the HDCC, a	\$81,150	9/28/2020	0

	Totals		\$145,842		
		Solutions, Inc.			
		included \$1,000 contribution from the Smart TD PAC, Sustainable Future PAC, & American Traffic			
11/2/2020	11/2/2020	One-page C-3 report with four contributors that	\$3,300	11/3/2020	0
10, 22, 2020	10,20,2020	included \$1,000 contributions from Fix It PAC, & \$800 from AGR Victory Fund.	<i>\$2,000</i>	10/20/2020	
10/22/2020	10/23/2020	Two-page C-3 report with eight contributors that	\$3,650	10/23/2020	0
		Committee and \$1,000 from the Puyallup Tribe of Indians.			
		from the Snohomish Co Democratic Central			
10/17/2020	10/17/2020	One-page C-3 report with a \$2,000 contribution	\$3,000	10/18/2020	0
		from the Skagit Co Democratic Party.			
10/12/2020	10/15/2020	One-page C-3 report with a \$5,380 contribution	\$5,380	10/15/2020	0
		Housing Alliance.			
		HealthCare 1199 NW, WA for All PAC, & WA			
10/7/2020	10/7/2020	Two-page C-3 report with nine contributors that included \$1,000 contributions from SEIU	\$6,070	10/11/2020	0
10/7/2020	10/7/2020	of State Employees, and an individual.	¢ < 0 7 0	10/11/2020	0
		included \$1,000 contributions from WA Federation			
10/1/2020	10/1/2020	Two-page C-3 report with eight contributors that	\$4,150	10/4/2020	0
		& \$1,500 from Skagit Co Democratic Party.			
		\$2,350 cont. from the Island Co Democratic Party,			

- PDC staff reviewed the 19 C-3 reports filed by the Campaign and listed in the chart above that totaled \$145,842 in contributions received and represented 33.2 percent of the \$439,519.22 in total contributions received during the 2020 election cycle. As noted in the table above, the Campaign timely filed all 19 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 19 of the C-3 reports reviewed by staff as part of this audit.
- PDC staff downloaded the 2020 contribution database for the Campaign as a CSV file into an Excel spreadsheet, formatted and sorted the spreadsheet, and then conducted a review of the 2020 contributor information disclosed on C-3 reports. As part of that review, staff confirmed the Campaign complied with the 2020 election contribution limits which were \$1,000 for the primary and general elections for any individual, political committee, business, labor union, association, other entities and persons (other than the caucus political committee listed above).
- Staff's review indicated the Campaign disclosed the Employer and Occupation information for 385 individuals as required for those that contributed more than \$100, although staff would note the number included individuals that also contributed less than \$100. The 385 individuals contributed \$90,511.85 in total contributions received and included 244 individuals that the Campaign disclosed as being "Not Employed" for the Employer and disclosing "Retired" as the Occupation.
- The PDC audit procedures included staff identifying contributors that made monetary contributions to the Campaign and then verifying or confirming the information disclosed for that specific contribution.

- For these audits, staff verified or confirmed selected contributions received by the Campaign by reviewing the expenditure reports of continuing political action committees (PAC) that were registered and required to file C-3 and C-4 reports with the PDC in CY 2020, that made contributions in 2020 to the Campaign. Staff reviewed the contribution spreadsheet and selected 10 PAC contributors that made monetary contributions totaling at least \$1,000 to the Campaign during the 2020 election. Once selected, staff reviewed the C-4 report filed by the PAC disclosing the contribution to the Campaign, and the corresponding C-3 report filed by the Campaign disclosing the 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.
- 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 on C-4 report	Disclosed by Donor	Days Rec'd After Made
4/24/2020	Service Employees Int'l Union Local 925 public Service PAC	\$1,000	5/6/2020	4/9/2020	C-4 report	15
7/30/2020	WA State Dental PAC	\$1,000	7/31/2020	7/21/2020	C-4 report	9
8/18/2020	Stewardship PAC	\$1,000	8/21/2020	8/3/2020	C-4 report	15
9/2/2020	AFT Washington COPE	\$1,000	9/8/2020	8/20/2020	C-4 report	13
9/15/2020	Retired Public Employees Council of WA PAC	\$1,000	9/18/2020	9/1/2020	C-4 report	14
9/25/2020	WA State Council of Fire Fighters	\$1,000	9/28/2020	9/11/2020	C-4 report	14
10/5/2020	The Kennedy Fund	\$1,000	10/11/2020	10/5/2020	C-4 report	0
10/7/2020	SEIU Healthcare 1199 NW PAC	\$1,000	10/11/2020	8/28/2020	C-4 report	40
10/22/2020	Fix It PAC	\$1,000	10/23/2020	10/20/2020	C-4 report	2
10/26/2020	Promise of Progress PAC	\$1,000	10/26/2020	10/20/2020	C-4 report	6

- 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 zero to 40 days after each PAC disclosed making the contributions. Staff based that information solely on the dates the expenditure for the contribution was disclosed as having been made by the PAC on the corresponding C-4 report, and the date the contribution was disclosed as having been received on the C-3 report filed by the Campaign.

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

• Candidates under the Full Reporting option in 2020 were required to file monthly C-4 reports by the 10th of each month disclosing contribution and expenditure activities incurred in the previous calendar month. Candidates appearing on the 2020 primary and general election ballots were required to file the following C-4 reports:

- 1. A 21-day Pre-Primary Election C-4 report was due on July 14, 2020, covering the period June 1 through July 13, 2020.
- 2. A 7-day Pre-Primary Election C-4 report was due on July 28, 2020, covering the period July 14 through July 27, 2020.
- 3. A Post-Primary Election C-4 report was due by September 10, 2020, covering the period July 28 through August 31, 2020.
- 4. A 21-day Pre-General Election C-4 report was due on October 13, 2020, covering the period September 1 through October 12, 2020.
- 5. A 7-day pre-General Election C-4 report was due on October 27, 2020, covering the period October 13 through October 26, 2020.
- 6. A Post-General Election C-4 report was due by December 10, 2020, covering the period October 27 through November 30, 2020.
- During 2020, the Campaign timely filed C-3 and C-4 reports throughout the year including the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports as detailed in the chart below.

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
January 2020	2/10/2020	2/09/2020	\$ 0	\$602.90	\$600 expenditure to Blue Wave Political Partners, LLC (BWPP), for Compliance Consulting.	0
February 2020	3/10/2020	3/9/2020	\$ 0	\$405.56	A \$252 expenditure reimbursing the candidate for webhosting fees; and a \$100 expenditure to BWPP.	0
March 2020	4/10/2020	4/10/2020	\$1,150	\$2,939.17	Two expenditures totaling \$1,800 for the Field Coordinator; \$530.75 for Payroll Taxes; and \$2,500 for an order placed with CN4 Partners for consulting.	0
April 2020	5/11/2020	5/11/2020	\$18,092.75	\$6,429.44	Five expenditures totaling \$4,186.41 were made to CN4 Partners for consulting/design work, and printing w/Overnight Printing.	0
May 2020	6/10/2020	6/10/2020	\$14,910.10	\$4,075.86	Two expenditures totaling \$985.56 were made to the Field Coordinator; two expenditures totaling \$733.41 were made to the candidate that included \$527.66 for the filing fee.	0
21-Day Pre- Primary Election C-4 report	7/14/2020	7/14/2020	\$40,621.90	\$48,226.39	Five expenditures totaling \$19,271 were made to CN4 Partners for consulting, mail design work, postage, and printing w/Morel Ink: and a \$16,688 in-kind contribution from HDCC for polling, research, and consulting.	0

7-Day Pre- Primary Election C-4 report	7/28/2020	7/28/2020	\$10,390	\$38,197.02	Seven expenditures totaling \$20,771 were made to CN4 Partners that included \$13,500 for digital advertising; \$16,771 mail design work, postage, and printing w/Morel Ink; and \$2,500 for consulting.	0
Post- Primary Election C-4 report	9/10/2020	9/10/2020	\$27,094.70	\$8,893.23	10 expenditures totaling \$4,834.36 were made to three individuals and GUSTO for the campaign manager and staff expenditures, payroll taxes and fees.	0
21-Day Pre-General Election C-4 report		10/13/2020	\$185,848.50	\$219,102.98	Two expenditures totaling \$200,000 were made to CN4 Partners that included a \$150,000 Comcast Cable TV ad buy, and a \$50,000 expenditure to SpotX for a social media ad buy; and a \$3,181.25 in- kind contribution from WA Senate Democratic Campaign for polling and research.	0
7-Day Pre- General Election C-4 report	10/27/2020	10/27/2020	\$81,006.90	\$75,514.78	Three expenditures totaling \$25,000 were made to CN4 Partners that included a \$15,000 expenditure for media production, a \$8,500 Comcast Cable TV ad buy, and 1,500 for consulting; and \$44,228.94 in total in-kind contributions from WA State Democratic Central Committee (WSDCC) for multiple direct mail pieces distributed 10/14 – 10/26/2020.	0
Post- General Election C-4 report	12/10/2020	12/10/2020	\$7,555	\$12,856.91	13 expenditures totaling \$9,662.72 were made to eight individuals and GUSTO for campaign staff expenditures, payroll taxes and fees; a \$4,000 win bonus expenditure made to CN4 Partners; two expenditures totaling \$738.83 were made to the WSDCC for text messages.	0

- The Campaign disclosed orders placed, debts or obligations on eight C-4 reports filed for the 2020 election cycle including the Post-Primary and General Election C-4 reports, and the 21-Day and 7-Day Pre-General Election C-4 reports.
- There were no candidate in-kind contribution/loans to the Campaign during the 2020 election.
- The C-4 reports timely disclosed expenditure information for payments made to vendors, largely involving political advertisements, and other miscellaneous Campaign services provided during the 2020 election cycle. The vendors receiving the largest Campaign expenditures during the 2020 election included the following:

- 1. 24 expenditures were made to CN4 Partners by the Campaign totaling \$290,254.16 for cable TV and broadcast advertising media buys, media production, printing and postage for mailers, digital advertisements and media buys, advertising management, consulting, and a winning bonus.
- 2. 41 expenditures were made to nine individuals by the Campaign totaling \$27,349.86 for payments made to the Campaign Manager, two Field Coordinators, and six Campaign Assistants.
- 3. 26 expenditures were made to Gusto by the Campaign totaling \$11,865.94 for Payroll Taxes and Fees.
- As part of the audit, PDC staff requested the Campaign provide copies of the books of accounts maintained for the expenditures listed below that were made by the 2020 Campaign including supporting documentation such as invoices, receipts, cancelled checks, notes, emails, etc.
- On May 17, 2021, the PDC received an email from Josie Olsen with Bluewave Consulting and Jay Petterson, Campaign Ministerial Treasurer, that included PDF attachments providing copies of the requested books of account documents for the expenditures listed in the Audit letter. **Audit Exhibit #1.** In addition, Ms. Olsen attached a letter responding to PDC staff's questions concerning the 2020 Campaign practices, contribution and expenditure processing procedures, and the maintenance of the campaign books of account. **Audit Exhibit #2.**
- The Campaign expenditures selected for review are detailed below and included a summary of each expenditure such as the date, amount and a description of the services disclosed on the C-4 reports. The summary was taken from copies of the books of account information provided by the Campaign, and included expenditures made to the following vendors:
 - Five expenditures made to CN4 Partners that included: (1) A \$150,000 expenditure made on October 7, 2020, for "Media Buy: Comcast/Skagit; WAVE Broadband/Camano, La Connor (10/5 – 11/2)"; (2) A \$50,000 expenditure made on October 9, 2020, for "SpotX: Cross Platform Preroll (10/9 – 11/3, 1,192,000 Impressions)"; (3) Four expenditures made on July 23, 2020, totaling \$16,771 to consult, design, print and mail 25,000 pieces; (4) A \$13,500 expenditure made on July 15, 2020, for "New Blue Interactive: Cross Platform Pre-roll (700,000 Impressions, 7/16 – 8/5)"; and (5) A \$3,525.75 expenditure made on September 13, 2020, for "Printing Walk Pieces (10,000): Overnight Printing."
 - 2. A \$4,391.48 expenditure to Capital City Press on June 25, 2020, to print 500 24 x 18-yard signs; 20 24 x 48 signs; and 10 48 x 96 signs.
 - 3. A \$1,769.86 expenditure on July 3, 2020, to Overnight Printing to print 10,000 postcards.
 - 4. A \$1,500 expenditure on September 21, 2020, to Sound Publishing Inc., for a "Whidbey News Times Ad (10/24, 10/28)."
 - 5. Two expenditures were made to the candidate, Dave Paul, on July 10 and 21, 2020, totaling \$1,053.86 with the description "Ashley's Design: T Shirt Printing (100)" and "Ashley's Design & Whidbey Sports: Deposit for T Shirt Printing (100)."

6. A \$576.57 expenditure for "Expenses of \$50 or Less" paid by the Campaign during the 21-Day Pre-General Election reporting period.

Expenditures to CN4 Partners

\$150,000 expenditure made on October 7, 2020, for "Media Buy: Comcast/Skagit; WAVE Broadband/Camano, La Connor:

• The documentation included a copy of: (1) Cerillion N4 Partners (CN4 Partners) Invoice #1578 and billed to Dave Paul with an October 7, 2020 invoice and due date, and the Payment Terms listed as "Due on receipt". The invoice listed the Activity as "Media Buy: Comcast Media Buy (subvendor: Comcast, \$127,500) with the Rate and Amount totaling \$150,000; and (2) 17-page Comcast media buy sheet made by the Dave Paul Campaign for Comcast, Skagit County and WAVE Broadband, Camano Island and La Connor covering the period October 5 through November 2, 2020.

\$50,000 expenditure made on October 9, 2020, for "SpotX: Cross Platform Pre-roll:

• The documentation included a copy of: (1) QuickBooks receipt and email from CN4 Partners dated October 8, 2020 and sent to the Campaign indicating that a \$50,000 payment needed to be made by the Campaign for CN4 Partners Invoice #1583. The receipt indicated the \$50,000 payment was due October 8, 2020 and stated "Here's your invoice! We appreciate your prompt payment."; and (2) CN4 Partners Invoice #1583 and billed to Dave Paul with an October 8, 2020 invoice and due date, and the Payment Terms listed as "Due on receipt". The invoice listed the Activity as "**Media Buy**: OTT Advertising, Run Dates: 10/9 to 11/3. Vendor breakdown: Spot X, \$21,250, CN4: \$3,750" and "Media Buy: OLV Advertising, Run Dates: 10/9 to 11/3. Vendor breakdown: Spot X, \$21,250, CN4: \$3,750."

Four expenditures made on July 23, 2020, totaling \$16,771 for a Campaign mailer:

The documentation included a copy of: (1) QuickBooks receipt and email from CN4 Partners dated July 13, 2020 and sent to the Campaign indicating that a \$16,771 payment needed to be made by the Campaign for CN4 Partners Invoice #1507. The receipt and email reply from Bluewave Politics indicated the itemized expenses for the mailing only added up to \$14,771, that the remaining \$2,000 was owed to CN4 Partners for consulting, and stated they would "remit today for report due tomorrow."; (2) CN4 Partners Invoice #1507 and billed to Dave Paul with an October 12, 2020 invoice and due date, the Total Due was \$16,771 with the Payment Terms listed as "Due on receipt". The invoice listed the Activity as "Media Buy: 8.5 x 11 mailer, 25k HH. Subvendors: USPS \$6,875.43, Sisti Creative, \$1,400, Morel Ink \$6,038.12, WA Dept. of Revenue, \$457.45" with a total balance due of \$16,771; and (3) Campaign check #1088 was made out to CN4 Partners and dated July 13, 2020, totaling \$16,771 and indicating it was "For Inv 1507."

\$13,500 expenditure made on July 15, 2020, for "New Blue Interactive: Cross Platform Pre-roll

• The documentation included a copy of: (1) QuickBooks receipt and email from CN4 Partners dated July 15, 2020 and sent to the Campaign indicating that a \$15,000 payment needed to be made by the Campaign for CN4 Partners Invoice #1513.

• The receipt and email reply from Bluewave Politics indicated they "Need to know the estimated impression for this media for the report due today."; (2) CN4 Partners Invoice #1513 and billed to Dave Paul with a July 15, 2020 invoice and due date, the Total Due was \$15,000 with the Payment Terms listed as "Due on receipt". The invoice listed the Activity as "**Media Buy**: IP Targeted Digital Display Advertising (Subvendor: New Blue Interactive \$13,500, CN4 \$1,500" with a total balance due of \$15,000; and (3) Campaign check #1089 was made out to CN4 Partners and dated July 15, 2020, totaling \$15,000 and indicating it was "For Inv 1513."

\$3,525.75 expenditure made on September 13, 2020, to Print 10,000 Walking Pieces

• The documentation included a copy of: (1) CN4 Partners Invoice #1359 and billed to Dave Paul with a September 10, 2019 Invoice Date, and an October 10, 2019, Due Date, and the Total Due was \$3,525.75 with the Payment Terms listed as "Due on receipt". The invoice listed the Activity as "**Media Buy**: Design, Print and ship 10k walk pieces with tear-off card" with a total balance due of \$3,525.75; and (3) Campaign check #1062 was made out to CN4 Partners and dated September 13, 2019, totaling \$3,525.75 and indicating it was "For Inv 1359."

\$4,391.48 expenditure to Capital City Press on June 25, 2020 to produce yard signs

• The documentation included a copy of: (1) QuickBooks email from CN4 Partners dated June 25, 2020 and sent to the Campaign requesting an expenditure be made to Capitol City Press and attaching a copy of Capitol City Press Invoice #134493 for yard signs. The email stated "With Dave's approval please pay directly to Capitol City Press", and Candidate Paul replied with his approval; (2) Capitol City Press Invoice #134493 and billed to Friends of Dave Paul with a June 23, 2020 Invoice Date, with the Payment Terms listed as "Due on receipt" and totaling \$4,391.48. The invoice listed the description as "200 - 24 x 18-yard signs with metal stakes; 20 - 24 x 48 Campaign signs; 10 - 48 x 96 Campaign signs; 300 - 24-18 yard signs no wood stakes"; and (3) Campaign check #1082 was made out to Capitol City Press, dated June 25, 2020, totaling \$4,391.48 and indicating it was "For Inv 134493."

\$1,769.86 expenditure on July 3, 2020, to Overnight Printing to print 10,000 postcards.

The documentation included a copy of: (1) QuickBooks email from CN4 Partners dated July 3, 2020, and sent to the Campaign entitled "Paul Invoice to be paid: Postcards" requesting an expenditure be made to Overnight Printing and attaching a copy of Overnight Printing Invoice #44119. The email stated, "With Dave's approval please pay the attached invoice directly to Overnight", and Candidate Paul replied with his approval; (2) Overnight Printing Invoice #44119 and billed to CN4 Partners with a July 1, 2020 Invoice Date, and totaling \$1,769.86. The invoice listed the description as "Dave Paul 4.25 x 5.5 Postcards with Union Bug, 4.25 x 5.5 WHITE TITAN GLOSS COVER-SKIDS" and listed the quantity printed as 10,000; and (3) Campaign check #1085 was made out to Overnight Printing, dated July 6, 2020, totaling \$1,769.86 and indicating it was "For Inv 44119."

\$1,500 expenditure on September 21, 2020, to Sound Publishing Inc., for a newspaper ad

• The documentation for the September 21, 2020, expenditure was made to Sound Publishing Inc., for a Campaign ad that ran in the Whidbey News Times and included copies of a QuickBooks email string between the Campaign and Blue Wave.

• The email string was dated September 21, 2020 and included an email from the Whidbey News Group with the Campaign requesting Blue Wave make an expenditure for newspaper advertisements. The email attached an invoice for the newspaper ads which was from Sound Publishing, Inc and included Sound Publishing, Inc. Invoice #200921B, billed to Dave Paul with a September 21, 2020 Billing Date, and totaling \$1,500. The invoice listed the description as "Dave Paul tab ons 10/24 and 10/28" for two advertisements costing \$750 each.

Two expenditures were made to the candidate, Dave Paul, on July 10 and 21, 2020, totaling \$1,053.86 with the description "Ashley's Design: T Shirt Printing (100)" and "Ashley's Design & Whidbey Sports: Deposit for T Shirt Printing (100)."

- The documentation included copies of three Campaign checks, all dated July 21, 2020, that included: #1092 made out to Bennett Massey-Helber for \$82.44 for "Final Payroll; #1093 made out to Dave Paul for \$566,38 for "T-shirt's, Tracfone reimbursements"; and #1094 made out to WA State Democrats for \$100 for "Thru text Setup Fee". The documentation included a QuickBooks email string between the Campaign and Blue Wave regarding reimbursements that were made to Candidate Paul.
- Those out-of-pocket expenditures he made that included a July 8, 2020 invoice from Ashley's Design & Letterman Jackets to print 100 Campaign T-shirts for a total cost of \$1,026.93. The invoice contained handwritten information stating that \$526.93 was paid by the candidate on July 9, 2020, with a \$500 balance owed, and a credit card receipt for \$500 paid also paid by the candidate to Ashley's Design & Letterman Jackets on July 15, 2020.

A \$576.57 expenditure for "Expenses of \$50 or Less"

- The documentation included a copy of the ORCA transaction details for the Friends of Dave Paul for expenses of \$50 or less and paid during the period September 1 through October 12, 2020. The transaction details included 11 expenditures the Campaign made to the USPS for "Postage" and six expenditures made to Anedot for "Credit Card Fees" to process online contributions received. The details also include expenditures the Campaign made for telephone charges, small salary payments made to Campaign staff, office supplies, and bank 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.
- The May 17, 2021 email received from Ms. Olsen included an attached letter to PDC staff providing the requested information concerning campaign practices, internal compliance controls, and procedures for processing and reporting contribution and expenditure activities. Ms. Olsen stated the Campaign used both ORCA and NGP Van Inc. campaign finance filing software during the 2020 election cycle, and added that the C-3 and C-4 reports filed by the Campaign from January 1, 2019 through July 27, 2020, were filed using ORCA, and the reports filed covering the period July 28 through December 31, 2020 were filed using NGP Van Inc.

2020 Contribution Process

- Ms. Olsen stated that monetary contributions received from Campaign events were "handed to the treasurer's compliance team within 48 hours by the campaign's fundraising team. Checks from the mail were immediately forwarded by the campaign to the treasurer." She stated the monetary contribution were entered into the campaign finance filing software by Eli Oldfield, a Blue Wave staff member. Copies of the checks were "scanned and uploaded to the campaign's electronic drive, then taken to the bank within five business days of being received by an agent of the campaign."
- Ms. Olsen stated that during this process, the Campaign's compliance team would verify that the required contributor information had been provided and was "on-file, or otherwise obtained in a timely manner." She stated that any contributions that exceeded the maximum contribution limits were either returned or refunded within five business days of the date received.
- Ms. Olsen stated the online credit card contributions were received and processed through Anedot, an online vendor that the Campaign contracted with to process contributions. She stated the contributions were transferred into the Campaign bank account within two business days of the contribution having been processed, and that the online contribution form required contributors to provide their "name, address, employer, occupation, employer city, and employer state." She stated the Campaign filed a separate C-3 report for each bank deposit made, and in addition, the Campaign reconciled all contributions received and deposited "to the bank account using QuickBooks accounting software, and this process was repeated at least once a week, or more often depending on weekly activity."

2020 Expenditure Process

- Ms. Olsen stated all Campaign expenses were approved by the candidate prior to the payment being made, and that all "*invoices and requests for payment were either submitted to the treasurer's office from the candidate or were paid on the candidate's campaign debit card*." She stated CN4 Partners was the Campaign's general consultant and they worked directly with the candidate to design and create any political advertisements. She stated that once the political advertisements had been approved, CN4 Partners would facilitate "*the publication of literature, direct mail, and online advertisements*."
- Ms. Olsen stated that all vendor invoices and expenditure requests for payment were required to be on-file with the Campaign prior to being paid in accordance with books of account and record keeping requirements. She stated that in the case of the TV media buys, the station-by-station breakdown "was also requested as soon as it became available. Mr. Petterson and Mx. Oldfield also maintained any other vendor information as it pertains to IRS requirements." In addition, she added that Mx. Oldfield would send a reminder email "to the candidate, staff, and consultants at the end of every C4 reporting period requesting all invoices, debts, estimates, and in-kinds for reporting purposes."

2018 Campaign Report Filings, Records and Books of Account

• Ms. Olsen stated that the candidate received weekly reports and financial updates from the Blue Wave treasurer/compliance team concerning all contribution and expenditure activities undertaken during the period.

- She stated the Blue Wave treasurer/compliance team would also review and search contribution and expenditure activities for any duplicate records, as well as verifying there was no missing contributor information before generating reports. She stated they would send draft copies of the reports to the candidate for his review prior to filing the C-3 or C-4 reports.
- Ms. Olsen stated that the "Campaign records are stored electronically, and the campaign books exist in the accounting software used by the treasurer." She stated the Campaign made copies of contributions received and expenditures made and that those documents "were scanned and uploaded to the campaign's electronic drive daily." She stated that additional records maintained by the Campaign included "vendor contracts, employment and payroll records, business license and other tax forms, and bank statements."
- Ms. Olsen stated Mr. Petterson, as Treasurer, was responsible for the campaign records and books of account, and that Mx. Oldfield "*assisted in curating records*." She stated that during the public inspection period, the electronic records were updated daily and available for review upon request, but that the Campaign did not receive any requests to inspect the records.
- Ms. Olsen stated that during the 2020 election, the candidate, Campaign staff and volunteers all received reimbursements for direct out-of-pocket campaign-related expenditures. She stated the Blue Wave treasurer/compliance team, maintained the Campaign's reimbursement forms and provided copies to the candidate, staff and volunteers. She stated they "were required to complete the form, provide corresponding receipts, and receive approval from the candidate prior to being reimbursed."

IV. Audit Documents Reviewed, Provided and Respondent Correspondence

- Staff reviewed C-1 reports, C-3 reports, and C-4 reports filed by the 2020 Dave Paul for State Representative Campaign covering the period of January 29, 2019, through December 31, 2020.
- Email exchanges between PDC staff, and Jay Petterson and Josie Olsen, Campaign Treasurers with Blue Wave Consulting, on behalf of the 2020 Dave Paul for State Representative Campaign.
- PDC staff queried the PDC Contribution and Expenditure database for the 2020 Dave Paul for State Representative Campaign contribution and expenditure information covering the period of January 19, 2019 through December 31, 2020.

V. <u>Statutes and Rules</u>

• **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 14th day of July 2021.

Electronically Signed Kurt Young PDC Compliance Officer

Audit Exhibits

- Audit Exhibit #1 Documents provided on May 21, 2021, by the 2020 Dave Paul Campaign in response to the audit letter.
- Audit Exhibit #2 Memorandum/letter provided on May 21, 2021, by the 2020 Dave Paul Campaign concerning campaign practices, procedures, and internal controls.

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	BILL TO				
	Dave Paul				
INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
1578	10/07/2020	\$0.00	10/07/2020	Due on receipt	

ACTIVITY	QTY	RATE	AMOUNT
Media Buy Comcast Media Buy (subvendor: Comcast, \$127,500)	1	150,000.00	150,000.00
		DUE	150,000.00 \$0.00
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026009593 - Wire Routing number 21320304 - Bank account number Bank name: Bank of America Name on account: Cerillion N4 Partners

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M-Su 4p-7p	M-Su 4p-7p	M-Su 7p-12m	M-Su 7p-12m	M-Su 7p-12m	M-Su 12m-2a	MNBC-TV	M-Su 5a-9a	M-Su 5a-9a	M-Su Sa-9a	M-Su 9a-4p	M-Su 9a-4p	M-Su 9a-4p	M-Su 4p-7p	M-Su 4p-7p	M-Su 4p-7p	M-Su 7n-12m	M-Su 7p-12m	M-Su 12m-2a	BCS-TV	M-Su 5a-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	B2-III/T INC-IM	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	SC-TV	M-Su 9a-4p	M-Su 4p-7p	m21-q/ uc-m	M-Sil 5a-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	M-Su 12m-2a	P12N-TV	M-5u 9a-4p	M 5 7- 13	IIIZT-d/ nc-ivi	M-Su 5a-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	M-Su 12m-2a

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7.6%	13.8%	8.6%	6.9%	1.4%	5.7%	1.8%	1.2%	1.9%	1.2%	2.1%	3.2%	2.1%	1.0%	4.6%	1.7%	2.3%	0/C.2	0.7%	1.3%	3.0%	5.3%	0.6%	3.9%	1.1%	1.5%	3.1%	0.6%	20.170	9.1%	11.9%	7.9%	1.7%	8.1%	1.9%	3.2%	3.9%	3.5%	7 202	1.0%	3.5%	1.4%	2.2%	1.4%	2.2%	3.6%	2.2%
216.35	270.44	324.53	448.83	520.92	511.42	442.71	420.67	631.01	841.34	320.57	480.85	641.14	466.81	569.72	/89.88	494.13	20.000	990 40	581.83	182.52	133.51	724.38	618.19	714.33	808.99	452.52	784.57	100.00	84 39	46.34	78.59	269.64	212.13	356.40	238.21	141.81	1/2.3b	203.32	708.51	220.96	364.02	546.02	728.03	357.29	476.39	595.49
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M-Su 7p-12m	M-Su 7p-12m	M-Su 7p-12m	M 8:30p-10p	M-Su 12m-2a	FOOD-TV	M-Su 9a-4p	M-Su 4p-7p	M-Su 4p-7p	M-Su 4p-7p	M-Su 7p-12m	M-Su 7p-12m	M-Su 7p-12m	M-Su 12m-2a	RFM-TV	M-5u 9a-4p	M-Su 4p-7p	mst-q/ us-ivi	M-Sil 5a-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	M-Su 12m-2a	-17	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	M-Su 12m-2a		n-Su 9a-4n	M-Su 4p-7p	M-Su 7p-12m	M-Su 12m-2a	ALL-TV	M-Su 5a-9a	M-Su 9a-4p	M-Su 4p-7p	w7T-d/ ns-w	B2-m21 UC-M	M-Su 5a-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 4p-7p	M-Su 4p-7p	M-Su 7p-12m	M-Su 7p-12m	M-Su 7p-12m

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2.2	4.2	2.4	1.3	1.6	1.3	1.3	1.7	1.3	2.2	5.0	2.7	2.4	2.9	2.6	2.2	2.3	1.4	1.7	1.5	1.5	4.3	2.7	2.3	2.1	2.2	4.5	2.4	2.9	2.5	2.4	2.9	2.5	2.2	4.6	0.7	2.4	2 5	4.5	2.4	2.9	2.6	4.5	2.4	2.9	2.6
0.8%	6.8%	2.8%	1.2%	1.9%	1.2%	2.3%	3.6%	2.3%	1.4%	1.9%	0.6%	0.5%	0.8%	1.2%	0.5%	5.7%	1.6%	2.3%	3.3%	0.7%	29.0%	7.0%	17.9%	11.8%	2.4%	1.3%	0.4%	0.9%	0.8%	1.1%	1.5%	2.1%	0.5%	2.3%	0.070	1 0%	1 3%	2.3%	1.3%	1.4%	1.1%	3.0%	1.3%	1.5%	2.0%
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M-Su 12m-2a	HIST-TV	M-Su 9a-4p	M-Su 4p-7p	M-Su 4p-7p	M-Su 4p-7p	M-Su 7p-12m	M-Su 7p-12m	M-Su 7p-12m	M-Su 12m-2a	HLN-TV	M-Su 5a-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	M-Su 12m-2a		M-Su 9a-4a	M-Su 4p-7p	M-Su 7p-12m	M-Su 12m-2a	MNBC-TV	M-Su 5a-9a	M-Su 4b-7p	M-Su 7p-12m	M-Su 12m-2a	NFLN-TV	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	M-Su 12m-2a	OXYG-TV	PE-PC NC-INI	M-Su 4a-4p	mc1-n2 inS-M	P12N-TV	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	PAR -TV	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m

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2.2	4.4	2.4	2.9	2.6	4.8	2.7	2.4	2.9	2.5	2.2	5.0	2.7	2.4	1.4	1.9	4.1	11	1.3	2.2	4.4	2.4	2.9	2.5	7 6	2.3	2.0	1.3	1.7	1.3	1.3	1.6	2.0	4 5	2.4	2.9	2.6	4.1	2.8	2.4	2.9	2.5	2.8	2.4	2.9	2.5
0.5%	4.1%	1.0%	2.5%	3.4%	2.2%	0.3%	0.8%	1.0%	1.6%	0.3%	5.6%	1.4%	1.5%	1.4%	2.1%	1.4%	3.0%	1.9%	0.9%	4.7%	1.3%	2.3%	3.7%	% 0.0	1.4%	2.1%	%6.0	1.4%	%6.0	1.5%	2.4%	1 1%	2.7%	1.3%	1.6%	1.7%	0.1%	0.0%	0.0%	0.0%	0.0%	0.8%	0.7%	0.6%	0.9%
941.45	300.59	806.24	249.29	213.66	795.41	2561.81	932.87	598.41	456.40	1330.77	557.19	483.57	506.42	441.38	662.06	C/.788	523.77	698.36	531.45	311.32	621.49	268.53	190.32	4C.000	558.59	440.73	760.41	1140.61	1520.81	741.61	988.81	10.0521	55.65	588.88	394.30	426.56	######	#######	######	#######	########	841.44	1114.48	1018.41	832.96
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\$5.00	\$425.00	\$5.00	\$5.00	\$5.00	\$645.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$1205.00	\$5.00	\$5.00	\$10.00	\$15.00	210.00	\$15.00	\$20.00	\$5.00	\$505.00	\$5.00	\$5.00	\$5.00	CI3AE OD	00'55	\$5.00	\$10.00	\$15.00	\$20.00	\$15.00	\$20.00	00.624	\$425.00	\$5.00	\$5.00	\$5.00	\$565.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00
NPE		NPE	NPE	NPE		NPE	NPE	NPE	NPE	NPE		NPE	NPE	NPE	NPE	NPE	NPE	NPE	NPE		NPE	NPE	NPE	INFE	NPF	NPE	NPE	NPE	NPE	NPE	NPE	NPE		NPE	NPE	NPE		NPE	NPE	NPE	NPE	NPE	NPE	NPE	NPE
M-Su 12m-2a	RTNW-TV	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	SYFY-TV	M-Su 5a-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	M-Su 12m-2a	BSC-TV	M-Su 5a-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 4p-7p	M-Su 4p-/p	M-Su 7p-12m	M-Su 7p-12m	M-Su 12m-2a	LIC-TV	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	BZ-MIZT UC-IM	M-Su 5a-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 4p-7p	M-Su 4p-7p	M-Su 7p-12m	M-Su 7p-12m	mst-q/ us-m	NT-VA	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	TRU -TV	M-Su Sa-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m	M-Su 5a-9a	M-Su 9a-4p	M-Su 4p-7p	M-Su 7p-12m

USA -TV		\$1125.00	1	113		1					\$60	1449	776.37	8.0%	2.3	28	28	28
M-Su 5a-9a	NPE	\$5.00	9	29	30	EM			EARLY MORNING	0.08	\$62	9	850.37	1.3%	1.7	1	7	2
M-Su 9a-4p	NPE	\$5.00	9	28	30	DT			DAYTIME	0.16	\$31	12	407.89	3.0%	1.5	2	7	7
M-Su 4p-7p	NPE	\$10.00	1	7	30	PA	9/4/20	10/11/20	PRIME ACCESS	0.18	\$56	14	713.02	1.1%	1.2	1		1
M-Su 4p-7p	NPE	\$15.00	e	14	30	PA	10/12/20	10/25/20	PRIME ACCESS	0.18	\$83	14	14 1069.53	1.9%	1.4		7	7
M-Su 4p-7p	NPE	\$20.00	1	2	30	PA	10/26/20	11/3/20	PRIME ACCESS	0.18	\$111	14	14 1426.05	1.1%	1.2			
M-Su 7p-12m	NPE	\$10.00	1	7	30	ΡŢ	9/4/20	10/11/20	PRIME	0.25	\$40	19	516.02	1.6%	1.1	2		
M-Su 7p-12m	NPE	\$15.00	m	14	30	PT	10/12/20	10/25/20	PRIME	0.25	\$60	19	774.03	2.8%	1.3	-	7	7
M-Su 7p-12m	NPE	\$20.00	1	2	30	μ	10/26/20	11/3/20	PRIME	0.25	\$80	19	19 1032.03	1.6%	1.1			
WETV-TV		\$565.00		113							\$54	805	702.28	2.3%	4.6	28	28	28
M-Su 5a-9a	NPE	\$5.00	9	29	30	EM			EARLY MORNING	0.02	\$250	1	3687.92	0.2%	2.8	7	7	2
M-Su 9a-4p	NPE	\$5.00	9	28	30	DI			DAYTIME	0.09	\$56	-	704.78	1.1%	2.4	2	7	1
M-Su 4p-7p	NPE	\$5.00	9	28	30	PA			PRIME ACCESS	0.12	\$42	5	552.88	1.1%	2.9	2	2	7
M-Su 7p-12m	NPE	\$5.00	9	28	30	PT			PRIME	0.14	\$36	11	446.79	1.6%	2.5	2	7	2

This report has been prepared using NuMath[®] research.

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Adjustments: Network Insertability and Network Carriage have been factored into calculations. Seattle-Tacoma 2BK Sep19-Oct19 DMA Nielsen Live+7 Cable Zones: COMVGST, Skagit Seattle-Tacoma 2BK Sep19-Oct19 DMA Nielsen Live+7 Cable Zones: WAVE BROADBAND, Camon Island Cable Zones: WAVE BROADBAND, La Conner

Seattle-Tacoma 2BK Sep19-Oct19 DMA Nielsen Live+7 PDTV: unrated station PDV: unrated station » Estimate information indicated has been supplied by the user.



Fwd: Invoice 1583 from Cerillion N4 Partners

12 messages

Josie Olsen <josie@bluewavepolitics.com> To: Eli Oldfield <eli@bluewavepolitics.com>

Let me know if I need to wire

----- Forwarded message ------From: **Cerillion N4 Partners** <quickbooks@notification.intuit.com> Date: Thu, Oct 8, 2020 at 12:27 Subject: Invoice 1583 from Cerillion N4 Partners To: <josie@bluewavepolitics.com>, <davepaul1968@hotmail.com> Thu, Oct 8, 2020 at 12:54 PM

INVOICE 1583



Cerillion N4 Partners

Dear Dave Paul,

Here's your invoice! We appreciate your prompt payment.

Thanks for your business! Cerillion N4 Partners

DUE 10/08/2020

\$50,000.00

Print or save

Powered by QuickBooks

Cerillion N4 Partners

1326 5th Ave. Suite 334 Seattle, WA 98101

dnielsen@cn4partners.com www.cn4partners.com

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



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Josie Olsen Blue Wave Political Partners, LLC

401 2nd Ave S Ste 303 Seattle, WA 98104 Office: (206) 682-7328 Pronouns: She/Her



Partners.pdf 52K

Eli Oldfield <eli@bluewavepolitics.com> To: Dean Nielsen <dnielsen@cn4partners.com>, Dean Nielsen <dnielsen@cerillionn4.com>, dave <dave@votedavepaul.com>, beth <beth@votedavepaul.com>

We can wire tomorrow after today's deposit clears, if Dave approves.

Best, Eli [Quoted text hidden]

Eli Oldfield Blue Wave Political Partners, LLC. 401 2nd Ave S Ste 303, Seattle, WA 98104 Office: (206) 682-7328 Cell: (903) 253-6788 Pronouns: They/Them



Audit Exhibit #1 Page 20 of 62 Invoice_1583_from_Cerillion_N4_Partners.pdf 52K

Eli Oldfield <eli@bluewavepolitics.com> To: dave <dave@votedavepaul.com>, beth <beth@votedavepaul.com>

Hello,

Please let me know if this invoice is approved. Current coh is \$56742.16, which does not include about \$3000 in pending contributions from Anedot.

Best, Eli [Quoted text hidden]

Beth Paul
beth@votedavepaul.com>
To: Eli Oldfield <eli@bluewavepolitics.com>
Cc: dave <dave@votedavepaul.com>

Fri, Oct 9, 2020 at 10:33 AM

Fri, Oct 9, 2020 at 10:27 AM

Dave approves! Quoting Eli Oldfield <eli@bluewavepolitics.com>:

Hello,

Please let me know if this invoice is approved. Current coh is \$56742.16, which does not include about \$3000 in pending contributions from Anedot.

Best, Eli

On Thu, Oct 8, 2020 at 1:27 PM Eli Oldfield <eli@bluewavepolitics.com> wrote:

We can wire tomorrow after today's deposit clears, if Dave approves.

Best, Eli

----- Forwarded message ------From: Josie Olsen <josie@bluewavepolitics.com> Date: Thu, Oct 8, 2020 at 12:54 PM Subject: Fwd: Invoice 1583 from Cerillion N4 Partners To: Eli Oldfield <eli@bluewavepolitics.com>

Let me know if I need to wire

----- Forwarded message ------From: Cerillion N4 Partners <quickbooks@notification.intuit.com> Date: Thu, Oct 8, 2020 at 12:27 Subject: Invoice 1583 from Cerillion N4 Partners To: <josie@bluewavepolitics.com>, <davepaul1968@hotmail.com>

INVOICE 1583 Cerillion N4 Partners

Dear Dave Paul,

Deau/M. Vielen CEO, CNA DADA

Dean Nielsen, Founder and CEO CN4 Partners (206) 423-0120 | www.cn4partners.com | dnielsen@cn4partners.com

To book a phone meeting, please use this link: https://calendly.com/deanatcn4

Eli Oldfield <eli@bluewavepolitics.com> To: Dean Nielsen <dnielsen@cn4partners.com>

Ah got it. Programmatic. Do you happen to have an estimated/targeted number of impressions? [Quoted text hidden]

Dean Nielsen <dnielsen@cn4partners.com> To: Eli Oldfield <eli@bluewavepolitics.com>

Sure, it's an auction environment so we dont now for sure, but 1,192,000 or so [Quoted text hidden]

Fri, Oct 9, 2020 at 12:39 PM

Fri, Oct 9, 2020 at 12:42 PM

1326 5th A Seattle, W dnielsen@	ocn4partners.com partners.com		In	voice		N4
	BILL TO Dave Paul					
INVOICE #	DATE 10/08/2	2020	TOTAL DUE	DUE DATE 10/08/2020	TERMS Due on receipt	ENCLOSED

ACTIVITY	QTY	RATE	AMOUNT
Media Buy OTT Advertising, Run Dates: 10/9 to 11/3. Vendor breakdown: SpotX, \$21,250, CN4: \$3750	1	25,000.00	25,000.00
Media Buy OLV Advertising, Run Dates: 10/9 to 11/3. Vendor breakdown: SpotX, \$21,250, CN4: \$3750		25,000.00	25,000.00
	PAYMENT		50,000.00
l	BALANCE D	DUE	\$0.00

026009593 - Wire Routing number 21320304 - Bank account number Bank name: Bank of America Name on account: Cerillion N4 Partners



Eli Oldfield <eli@bluewavepolitics.com>

Fwd: Invoice 1507 from Cerillion N4 Partners

7 messages

Josie Olsen <josie@bluewavepolitics.com> To: Eli Oldfield <eli@bluewavepolitics.com>

Dept of Revenue charge is sales tax.

------Forwarded message ------From: Cerillion N4 Partners <quickbooks@notification.intuit.com> Date: Sun, Jul 12, 2020 at 7:37 PM Subject: Invoice 1507 from Cerillion N4 Partners To: <josie@bluewavepolitics.com>, <davepaul1968@hotmail.com>

INVOICE 1507



Cerillion N4 Partners

Dear Dave Paul,

Here's your invoice! We appreciate your prompt payment.

Thanks for your business! Cerillion N4 Partners

> DUE 07/12/2020 \$16,771.00

> > Print or save

Powered by QuickBooks

Sun, Jul 12, 2020 at 8:25 PM

Audit Exhibit #1 Page 24 of 62 **Cerillion N4 Partners**

1326 5th Ave. Suite 334 Seattle, WA 98101 dnielsen@cn4partners.com www.cn4partners.com

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



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Josie Olsen Blue Wave Political Partners, LLC

401 2nd Ave S Ste 303 Seattle, WA 98104 Office: (206) 682-7328 Pronouns: She/Her



Invoice_1507_from_Cerillion_N4_Partners.pdf 52K

Eli Oldfield <eli@bluewavepolitics.com> To: Dave Paul <davepaul1968@hotmail.com>

Please let me know if we are approved to pay.

Best, Eli [Quoted text hidden]

Eli Oldfield Blue Wave Political Partners, LLC. 401 2nd Ave S Ste 303, Seattle, WA 98104 Office: (206) 682-7328 Cell: (903) 253-6788 Pronouns: They/Them



Mon, Jul 13, 2020 at 7:54 AM

Invoice_1507_from_Cerillion_N4_Partners.pdf

Dave Paul <davepaul1968@hotmail.com> To: Eli Oldfield <eli@bluewavepolitics.com>

Approved

From: Eli Oldfield <eli@bluewavepolitics.com> Sent: Monday, July 13, 2020 7:54 AM To: Dave Paul <davepaul1968@hotmail.com> [Quoted text hidden]

[Quoted text hidden]

Eli Oldfield <eli@bluewavepolitics.com>

Mon, Jul 13, 2020 at 2:10 PM

To: Dean Nielsen <dnielsen@cn4partners.com>, Dave Paul <davepaul1968@hotmail.com>, dave <dave@votedavepaul.com>, Breann Pugnetti <breann@cerillionn4.com>

The itemized expenses only add up to \$14771 -- Is the remaining \$2k paid to CN4 directly for consulting?

Please let me know ASAP, will remit today for report due tomorrow.

Best, Eli

----- Forwarded message ------From: Josie Olsen <josie@bluewavepolitics.com> Date: Sun, Jul 12, 2020 at 8:26 PM [Quoted text hidden] [Quoted text hidden]

Eli Oldfield Blue Wave Political Partners, LLC. 401 2nd Ave S Ste 303, Seattle, WA 98104 Office: (206) 682-7328 [Quoted text hidden]

Invoice_1507_from_Cerillion_N4_Partners.pdf 52K

 Dean Nielsen <dnielsen@cn4partners.com>
 Mon.

 To: Eli Oldfield <eli@bluewavepolitics.com>
 Cc: Dave Paul <davepaul1968@hotmail.com>, dave <dave@votedavepaul.com>, Breann Pugnetti

 <breann@cerillionn4.com>

correct. It seems weird to list myself as a subvendor but we can do that if you want [Quoted text hidden]

Dean Nielsen, Founder and CEO CN4 Partners (206) 423-0120 | www.cn4partners.com | dnielsen@cn4partners.com

To book a phone meeting, please use this link: https://calendly.com/deanatcn4

Mon, Jul 13, 2020 at 2:18 PM

Mon, Jul 13, 2020 at 1:28 PM

Audit Exhibit #1 Page 26 of 62

 Eli Oldfield <eli@bluewavepolitics.com>
 Mon,

 To: Dean Nielsen <dnielsen@cn4partners.com>
 Cc: Dave Paul <davepaul1968@hotmail.com>, dave <dave@votedavepaul.com>, Breann Pugnetti

 <breann@cerillionn4.com>

No need, just wanted to make sure I knew where to account for the remaining \$2000. Is it a monthly retainer or direct mail consulting?

[Quoted text hidden]

 Dean Nielsen <dnielsen@cn4partners.com>
 Mon, Jul 13, 2020 at 2:26 PM

 To: Eli Oldfield <eli@bluewavepolitics.com>
 Cc: Dave Paul <davepaul1968@hotmail.com>, dave <dave@votedavepaul.com>, Breann Pugnetti

 <breann@cerillionn4.com>

Mail [Quoted text hidden] Mon, Jul 13, 2020 at 2:21 PM

Cerillion N4 Partners 1326 5th Ave. Suite 334 Seattle, WA 98101 dnielsen@cn4partners.com www.cn4partners.com		Inv	bice		N4	
	BILL TO Dave Paul					
INVOICE #	DATE	TO	TAL DUE	DUE DATE	TERMS	ENGLOSED
1507	07/12/2	920 \$1	6,771.00	07/12/2020	Due on receipt	

ACTIVITY	OTY	RATE	AMOUNT
Media Buy 8.5x11 mailer, 25k HH. Subvendors: USPS, \$6,875.43, Sisti Creative, \$1,400, Morel Ink, \$6038.12, WA Dept. of Revenue, \$457.45	1	16,771.00	16,771.00
	BALANCE D	\$16,771.00	

026009593 - Wire Routing number 21320304 - Bank account number Bank name: Bank of America Name on account: Cerillion N4 Partners

Alt	19-2/1250 WA 98097	\$ 16 741. Co Proto Beposite Delais onback	AN ALAR AND A	
	7-13-2000 Date	and t all the bollars		
		Several	J J Contraction of the second	
		Sever Hundred		
	PAUL		1507	
st st	FRIENDS OF DAVE I PO BOX 387 OAK HARBOR, WA 98277	Sizter America	ACH R/T 125000024 For UNU 150	

Audit Exhibit #1 Page 29 of 62

Cerillion N4 Partners 1326 5th Ave. Suite 334 Seattle, WA 98101 dnielsen@cn4partners.com www.cn4partners.com BILL TO Dave Paul		1	nvoice		N4
INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
1507	07/12/2020	\$0.00	07/12/2020	Due on receipt	

ACTIVITY	QTY	RATE	AMOUNT
Media Buy 8.5x11 mailer, 25k HH. Subvendors: USPS, \$6,875.43, Sisti Creative, \$1,400, Morel Ink, \$6038.12, WA Dept. of Revenue, \$457.45	1	16,771.00	16,771.00
	PA MENT ANCE D	DUE	16,771.00 \$0.00

026009593 - Wire Routing number 21320304 - Bank account number Bank name: Bank of America Name on account: Cerillion N4 Partners



Eli Oldfield <eli@bluewavepolitics.com>

Fwd: Invoice 1513 from Cerillion N4 Partners

4 messages

Josie Olsen <josie@bluewavepolitics.com> To: Eli Oldfield <eli@bluewavepolitics.com>

This is approved.

------Forwarded message ------From: Cerillion N4 Partners <quickbooks@notification.intuit.com> Date: Wed, Jul 15, 2020 at 2:39 PM Subject: Invoice 1513 from Cerillion N4 Partners To: <josie@bluewavepolitics.com>, <davepaul1968@hotmail.com>

INVOICE 1513



Cerillion N4 Partners

Dear Dave Paul,

Here's your invoice! We appreciate your prompt payment.

Thanks for your business! Cerillion N4 Partners

> DUE 07/15/2020 \$15,000.00

> > Print or save

Powered by QuickBooks

Wed, Jul 15, 2020 at 3:02 PM

Audit Exhibit #1 Page 31 of 62 I'd send with two day tracking because of the amount. It doesn't say overnight so no. [Quoted text hidden]

Eli Oldfield <eli@bluewavepolitics.com>

To: Dean Nielsen <dnielsen@cn4partners.com>, Dave Paul <davepaul1968@hotmail.com>, dave <dave@votedavepaul.com>, beth <beth@votedavepaul.com>

I need to know the estimated impressions for this media buy for the report due today. [Quoted text hidden]

Eli Oldfield Blue Wave Political Partners, LLC.

401 2nd Ave S Ste 303, Seattle, WA 98104 Office: (206) 682-7328 [Quoted text hidden]

Invoice_1513_from_Cerillion_N4_Partners.pdf 52K Tue, Jul 28, 2020 at 6:32 PM

de la Deposite Details on back \$ 15,000 .00 19-2/1250 WA 98097 1089 Dollars 15-2030 8 00/ Les Order OF CEDILICA NY Partners Thousand FRIENDS OF DAVE PAUL Bankof America Fiften : 1 2 20000 2 1 : For INU 1513 OAK HARBOR, WA 98277 ACH R/T 125000024 PO BOX 387 Harland Clarke

Cerillion N4 Partners 1326 5th Ave. Suite 334 Seattle, WA 98101 dnielsen@cn4partners.com www.cn4partners.com		In	voice	:CN		
	BILL TO					
	Dave Paul					
INVOICE #	DATE		TOTAL DUE	DUE DATE	TERMS	ENCLOSED
1513	07/15/2	2020	\$15,000.00	07/15/2020	Due on receipt	

ACTIVITY	QTY	RATE	AMOUNT
Media Buy IP Targeted Digital Display Advertising (Subvendor: New Blue Interactive \$13,500, CN4 \$1,500)	1	15,000.00	15,000.00
	BALANCE D	DUE	\$15,000.00

026009593 - Wire Routing number 21320304 - Bank account number Bank name: Bank of America Name on account: Cerillion N4 Partners

Cerillion N4 Partners 1326 5th Ave. Suite 334 Seattle, WA 98101 dnielsen@cn4partners.com www.cn4partners.com		1	nvoice				
	BILL TO						
Dave Paul							
INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED		
1513	07/15/2020	\$0.00	07/15/2020	Due on receipt			

ACTIVITY	QTY	RATE	AMOUNT
Media Buy IP Targeted Digital Display Advertising (Subvendor: New Blue Interactive \$13,500, CN4 \$1,500)	1	15,000.00	15,000.00
	BA ANCE D	15,000.00 \$0.00	

026009593 - Wire Routing number 21320304 - Bank account number Bank name: Bank of America Name on account: Cerillion N4 Partners

1062 91.71/c 1927/20 WA	Date	\$ 3525.75	cd 75/w Dollars	(NAR	(2 mm	
FRIENDS OF DAVE PAUL PO BOX 387 OAK HARBOR, WA 98277	(order of Exultion NY Hurtnews	and I more the hundred thank going more and	Bank of America	ACH R/T 125000024	For INN# 1359		Herited Cates

500 Union Seattle, W	cerillionn4.com	1	nvoice		N4
	BILL TO Dave Paul	and a state of the second s			
	Daverau				
INVOICE #	DATE	TOTAL DUE \$3,525.75	DUE DATE:	TERMS	ENCLOSED

ACTIVITY	ΟΤΥ	RATE	AMOUNT
Media Buy Design, print and ship 10k walk pieces with tear-off card.	1	3,525.75	3,525.75
	BALANCE DU	JE	\$3,525.75

÷

Photo Safe Deposit® Details on bac ŝ 1 \$ 4391.48 19-2/1250 WA 98097 1082 Θ Three Hundr'S Ninury One & 46/00 Dollars Date 6-25-2030 OPHOL CITY Pass **Bank of America** СН R/T 125000024 in 1 NJ 134493 FRIENDS OF DAVE PAUL 1 2 20000 2 4 : LARCOAL **DAK HARBOR, WA 98277** Pay To The Order Of PO BOX 387 71975 -lor-Clarke



CAPITOL CITY PRESS

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

- PAUL, FRIENDS OF DAVE
- DLOS **PO BOX 387**

OAK HARBOR, WA 98277

TO

INVOICE DATE 6/23/2020

INVOICE NUMBER 134493

CUSTOMER NUMBER 1441

Remit to Address:

Capitol City Press Inc 2975 37th Ave SW Tumwater, WA 98512

PURCHASE ORDER NO.	ORDERED BY	JOB TICKET	SALESPERSON	TERMS
CAMPAIGN SIGNS	CN4 PARTNERS	WO2042	Rodney Anderson	Due Upon Receipt
	DESCRIPTI	ON	- I	
200 - 24 X 18 YAI WITH METAL ST	RD SIGNS AKES			4,040.00
20 - 24 X 48 CAM	PAIGN SIGNS		1.4	
10 - 48 X 96 CAM	PAIGN SIGNS			
300 - 18 X 24 YAF NO WOOD STAK	RD SIGNS			
- 10 0 10 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0				
			4	
			5	
			Sales Tax	351.48
			TOTAL	4,391.48
1 1/2% p	er month service charge	on past due accounts	Payment due on or	before 6/30/2020
	Please Pay From Th	is Invoice		

Visit us at our website: www.capitolcitypress.com



Fwd: dave paul campaign signs invoice

3 messages

Breann Pugnetti <breann@cerillionn4.com> Thu, Jun 25, 2020 at 12:22 PM To: Eli Oldfield <eli@bluewavepolitics.com>, Dave Paul <davepaul1968@hotmail.com>, beth <beth@votedavepaul.com>

Hi all,

With Dave's approval please pay directly to Capitol City.

Thanks! Breann

-----Forwarded message ------From: **Rodney Anderson** <<u>r.anderson@capitolcitypress.com</u>> Date: Wed, Jun 24, 2020 at 9:40 AM Subject: dave paul campaign signs invoice To: Breann Pugnetti <<u>breann@cerillionn4.com</u>>

Here you go.

Thank you Rodney

--Breann Pugnetti Pronouns: She/Her CN4 Partners 303-746-8876

mv134493.pdf 42K

Dave Paul <davepaul1968@hotmail.com> Thu, Jun 25, 2020 at 12:30 PM To: Breann Pugnetti <breann@cerillionn4.com>, Eli Oldfield <eli@bluewavepolitics.com>, beth <bre>beth@votedavepaul.com>

Approved!

From: Breann Pugnetti <breann@cerillionn4.com> Sent: Thursday, June 25, 2020 12:22 PM To: Eli Oldfield <eli@bluewavepolitics.com>; Dave Paul <davepaul1968@hotmail.com>; beth <beth@votedavepaul.com> Subject: Fwd: dave paul campaign signs invoice

[Quoted text hidden]

Eli Oldfield <eli@bluewavepolitics.com> To: Dave Paul <davepaul1968@hotmail.com> Cc: Breann Pugnetti <breann@cerillionn4.com>, beth <beth@votedavepaul.com> Thu, Jun 25, 2020 at 1:19 PM

Paid.

Best, Eli [Quoted text hidden]

Eli Oldfield Blue Wave Political Partners, LLC.

401 2nd Ave S Ste 303, Seattle, WA 98104 Office: (206) 682-7328 Cell: (903) 253-6788 Pronouns: They/Them



Harland Clarke ACH R/T 125000024 For 1: 1 250000 24.1: Bank of America FRIENDS OF DAVE PAUL PO BOX 387 OAK HARBOR, WA 98277 Pay To The Order Of Π - MA housing sen Hunde 44119 Unight G I T Tomt ス -6-20 500 g %//c Dollars Deposite Delais on bed \$ 1769-86 Date 19-2/1250 WA 98097 1085 NP Pg



INV	0	CF
	44110	-

No:	44119
Date:	7/1/20
Customer PO:	
Customer No:	1731

Ship To:

Breann Pugnetti Cerillion N4 Partners E-Mail: breann@cerillionn4.com

	and the second second	Description	Amount
10,000	COVER-SK	4.25x5.5 Postcards with Union Bug, 4.25 x 5.5 WHITE TITAN GLOSS IDS Sub 100, printed, 8 Up, 4 colors front in CMYK ink, 4 colors back in CMYK	\$ 1,864.71
	ink 8	Mega Plate	
	2	Kodak Special Mix & Wash	
	12	Cover Stock Cut to 4.25x5.5	
	1 25	Ship to Dave Paul : 2130 Fairway Ln, Oak Harbor WA 98277	
Taken by:	Jay	Customer Discount SUBTOTAL	-\$ 257.21 \$ 1,607.50
		SUBTOTAL TAX	\$ 1,607.50 \$ 162.36
		SUBTOTAL	\$ 1,607.50
Taken by: Account Typ		SUBTOTAL TAX SHIPPING	\$ 1,607.50 \$ 162.30 \$ 0.00
		SUBTOTAL TAX	\$ 1,607.50 \$ 162.30 \$ 0.00 \$ 1,769.80
		SUBTOTAL TAX SHIPPING TOTAL	\$ 1,607.50 \$ 162.30 \$ 0.00

(E)



Fri, Jul 3, 2020 at 8:04 AM

PAUL INVOICE TO BE PAID: Postcards

3 messages

Breann Pugnetti <breann@cerillionn4.com>

To: Eli Oldfield <eli@bluewavepolitics.com>, Dave Paul <davepaul1968@hotmail.com>

Hello,

With Dave's approval please pay the attached invoice directly to Overnight.

Dave, the final price including delivery came in lower than our estimate- happy Friday!

Thanks so much, Breann

Breann Pugnetti Pronouns: She/Her CN4 Partners 303-746-8876

Invoice_CN4_44119.pdf 37K

Dave Paul <davepaul1968@hotmail.com> To: Breann Pugnetti <breann@cerillionn4.com>, Eli Oldfield <eli@bluewavepolitics.com> Fri, Jul 3, 2020 at 8:59 AM

Hi Breann, Thanks!

Eli: Approved to pay.

Thanks to you both! Dave

From: Breann Pugnetti <breann@cerillionn4.com> Sent: Friday, July 3, 2020 8:04 AM To: Eli Oldfield <eli@bluewavepolitics.com>; Dave Paul <davepaul1968@hotmail.com> Subject: PAUL INVOICE TO BE PAID: Postcards

[Quoted text hidden]

Eli Oldfield <eli@bluewavepolitics.com> To: Dave Paul <davepaul1968@hotmail.com> Cc: Breann Pugnetti <breann@cerillionn4.com>

Paid.

Best, Eli Mon, Jul 6, 2020 at 11:29 AM

[Quoted text hidden]

--Eli Oldfield Blue Wave Political Partners, LLC. 401 2nd Ave S Ste 303, Seattle, WA 98104

Office: (206) 682-7328 Cell: (903) 253-6788 Pronouns: They/Them





ADVERTISING STATEMENT & INVOICE

PO Box 93				BILLING PERIOD	ADVERTISER/	
Everett, W	A 98206			October	Dave	
_	ACCO	OUNT NAME AND ADDR	ESS	INVOICE #	TERMS OF PAYMENT	PAGE #
				200921B	Due on Receipt	1-1
				ACCOUNT NUMBER	BILLING DATE	ADVERTISER/CLIENT
		Dave Paul		80148719	09/212020	Dave Paul
				For questions read	s, please call 1-800-48 arding rates, sizes or a ales representative.	95-4920. d charges,
DATE	AD #	DESCRIPTION -	OTHER COMMENTS/CHARGES	SAU SIZE BILLED UNITS	TIMES RUN RATE	NET AMOUNT
9/20/2	Tab Ons		tab ons 10/24 & 10/28	3 750.00	2	1500
CURRENT N	ET AMOUNT DUE	30 DAYS	60 DAYS	04.0 400		
Performent of		SU DATO	DU DAYS	90 DAYS	TOTAL AMOU	
		OF THE WHICH IS ALL IN			18	500.00

A FINANCE CHARGE OF 1/2% WHICH IS AN ANNUAL RATE OF 15% WILL BE ADDED TO ADDOUNTS OVER 30 DAYS

THE INVOICE/STATEMENT SHALL BE DEEMED CORRECT UNLESS ADVISED IN WRITING WITHIN 30 DAYS OF BILLING DATE REMIT TO BILLING DATE

PLEASE DETACH AND RETURN STUB WITH YOUR REMITTANCE



INVOICE #	BILLING DATE	TOTAL AMOUNT DUE
200921B	09/212020	1500.00
ACCOUNT NUMBER	ADVERTISE	R/CLIENT NAME
80148719	Da	ave Paul

How to pay your bill:

PC or Telephone banking through your Financial Institution.
 By credit card, please call1-800-489-3390.
 By check payable to Sound Publishing, Inc.

Sound Publishing, Inc PO Box 930, Everett, WA 98206

REMIT TO



Mon, Sep 21, 2020 at 10:48 AM

Fwd: invoice

4 messages

Beth Paul <beth@votedavepaul.com> To: Eli Oldfield <eli@bluewavepolitics.com>

Hi Eli,

Could we get this paid today?

Thanks so much!

Beth

----- Forwarded message from Kimberlly Winjum <kwinjum@whidbeynewsgroup.com> -----Date: Mon, 21 Sep 2020 10:35:55 -0700 From: Kimberlly Winjum <kwinjum@whidbeynewsgroup.com> Subject: invoice To: Beth Paul <beth@votedavepaul.com>

----- End forwarded message -----

Beth Paul (she/her) Campaign Manager for Dave Paul (360)320-5048

------ Forwarded message ------From: Kimberlly Winjum <kwinjum@whidbeynewsgroup.com> To: Beth Paul <beth@votedavepaul.com> Cc: Bcc: Date: Mon, 21 Sep 2020 10:35:55 -0700 Subject: invoice

	SKM	_C25820092110450.pdf
5	71K	

Eli Oldfield <eli@bluewavepolitics.com> To: Beth Paul <beth@votedavepaul.com> Mon, Sep 21, 2020 at 10:55 AM

Yes. Can you please let me know where the ads will be published?

Thank you, Eli

[Quoted text hidden] [Quoted text hidden]



Subject: invoice

Beth Paul <beth@votedavepaul.com> To: Eli Oldfield <eli@bluewavepolitics.com> Mon, Sep 21, 2020 at 11:00 AM

Hi Eli,

So sorry, but they just emailed that they would prefer credit card! So no worries on getting this paid, I'll give them a call.

It's with the Whidbey News Times if that's still helpful.

Thanks!

Beth Quoting Eli Oldfield <eli@bluewavepolitics.com>:

[Quoted text hidden] *Eli Oldfield* *Blue Wave Political Partners, LLC.* *401 2nd Ave S Ste 303, Seattle, WA 98104* Office: (206) 682-7328 Cell: (903) 253-6788 Pronouns: They/Them https://www.mypronouns.org/they-them/>

[Quoted text hidden]

Eli Oldfield <eli@bluewavepolitics.com> To: Beth Paul <beth@votedavepaul.com>

Perfect, thanks! [Quoted text hidden]

Eli Oldfield Blue Wave Political Partners, LLC. 401 2nd Ave S Ste 303, Seattle, WA 98104 Office: (206) 682-7328 Cell: (903) 253-6788 Pronouns: They/Them



Mon, Sep 21, 2020 at 11:08 AM

RIENDS OF DAVE PAUL O BOX 387 DAK HARBOR, WA 98277	1092 19-2/1250 WA 98097 Date
Pay To The Bannett Massey - Helber Signty Two a 044/100	Dollars Dollars
Bank of America ACH R/T 125000024 For FIACL Payroll I: 1 2 50000 24.12 III 2 50000 24.12 IIII 2 50000 24.12 IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	A.C.
FRIENDS OF DAVE PAUL PO BOX 387 OAK HARBOR, WA 98277 Pay To The Dave Paul Five Hundra Sixty-Six	1093 19-2/1250 WA 98097 \$ 566.38 \$ 38/100 Dollars
Bank of America ACH R/T 125000024 For Tshicts, Tracture Rembrants 1:1250000241: Marland Clarke	
FRIENDS OF DAVE PAUL PO BOX 387 OAK HARBOR, WA 98277 Pay To The Washington State	1094 7-21-2020 Date Demorats \$ 100.60
Order Of <u>Order Andrewson</u> <u>Order Of One Hundred Sol 100</u> Bank of America ACH R/T 125000024 For <u>This Text Setupfee</u> : 1 2 50000 2 4 ::	Dollars Debte Detection De

measure in reading in constant See Jul 15, 200 at 57 MI measure in constant See Jul 15, 200 at 57 MI in constant See Jul 15, 200 at 57 MI in constant See Jul 15, 200 at 57 MI in constant See Jul 15, 200 at 57 MI in constant See Jul 15, 200 at 57 MI in constant See Jul 15, 200 at 57 MI in constant See Au in constant	BLUE WAVE Parenesian	Eli Oldfield <eli@bluewavepolitics.com></eli@bluewavepolitics.com>
one. Here's the receipt for 539.45. I the next check(I sent a receipt for 5500 for T-Shirts with the checks that were mailed today to BWPP. I the next check(I sent a receipt for 5500 for T-Shirts with the checks that were mailed today to BWPP.	receipt for phone airtime	
one. Here's the receipt for \$30.46. I the next check! I sent a receipt for \$500 for T-Shirts with the checks that were mailed today to BWPP. e Tax ² is Tat the series this week.	Dave Paul <davepau1968@hotmail.com> To: Eli Oldfield <eli@bluewavepolitics.com></eli@bluewavepolitics.com></davepau1968@hotmail.com>	Sat, Jul 18, 2020 at 5:27 PM
I the next check! I sent a receipt for \$500 for T-Shirts with the checks that were mailed today to BWPP. e Tax ² is and the shirts this weak.	Hi Eli, I just added minutes to my campaign phone. Here's the receipt for \$39.45.	
t 13. ² Is and the shifts this week.	I'd like to be reimbursed when you send the next check! I sent a receipt for \$500 for T-Shirts with the checks that were mailed today to BWPP.	
e Tax ² Is and the stritts this week.	Thanks! Dave	
e Tax ² s and the shirst his week.	Phone Number or IMEI	
e Tax ² sand the shirs this week.	Payment Method	1807-750 (000)
e Tat ² s and the shirts this week.	Transaction ID	* 1000
e Tax ² s and the shrits this week.	Transaction Type	1440384406
e Tax ² is and the shirs this week.	Source	Airtime Purchase
e Tax ² s and the shifs this week.	Date	WEB
e Tax ² is and the shirts this week.	Subtotal:	07/18/2020
e Tax ² is and the shirts this week.	Discounts	35.00
e Tax ² is and the shirts this week.		0.00
e lax ² is and the shirts this week.		3.15
is and the shirts this week.	State & County Enhanced E911 Excise Tax ²	0.95
is and the shirts this week.	Federal Universal Service ³	0.28
is and the shirts this week.	Regulatory Cost Recovery ⁴	
is and the shirts this week.	Total Charges	
is and the shirts this week.		C4.YC
Thanks! Will send your reimbursement for this and the shirts this week.	Eli Oldfield <eli@bluewavepolitics.com> To: Dave Paul <davepaul1968@hotmail.com></davepaul1968@hotmail.com></eli@bluewavepolitics.com>	Sat, Jul 18, 2020 at 5:35 PM
	Thanks! Will send your reimbursement for this and the shirts this week.	

Best Eli [Quoted text hidden]

BLUE WAVE PUTTICAL PARTIES, LLC.	
Eli Oldfield <eli@bluewavepolitics.com> To: Dave Paul <davepaul1968@hotmail.com></davepaul1968@hotmail.com></eli@bluewavepolitics.com>	Mon, Jul 20, 2020 at 1:25 PM
Can you let me know who the phone company is? Need to know for reporting.	
Thanks, Eli [Quoted text hidden]	
Eli Oldfield <eli@bluewavepolitics.com> To: Dave Paul <davepaul1968@hotmail.com></davepaul1968@hotmail.com></eli@bluewavepolitics.com>	Mon, Jul 20, 2020 at 1:29 PM
Also- I sent out the Tshirt reimbursement on 7/10 along with the Corner Bar & Grill and 300 postcard stamps reimbursement. Should have been 758.13 total.	
Dave Paul ≺davepaul1968@hotmail.com> To: Eli Oldfield <eli@bluewavepolitics.com></eli@bluewavepolitics.com>	Mon, Jul 20, 2020 at 1:47 PM
Hi Eli, It's Tracfone.	
Thanks for all the help! Dave	
From: Eli Oldfield <eli@bluewavepolitics.com> Sent: Monday, July 20, 2020 1:25 PM To: Dave Paul <davepaul1968@hotmail.com> Subject: Re: receipt for phone airtime</davepaul1968@hotmail.com></eli@bluewavepolitics.com>	
[Quoted text hidden]	
Dave Paul ≺davepaul1968@hotmail.com> To: Eli Oldfield <eli@bluewavepolitics.com></eli@bluewavepolitics.com>	Mon, Jul 20, 2020 at 1:48 PM
l got it last weekthanks so much!	
From: Eli Oldfield <eli@bluewavepolitics.com> Sent: Monday, July 20, 2020 1:29 PM To: Dave Paul <davepaul1968@hotmail.com> Subject: Re: receipt for phone airtime</davepaul1968@hotmail.com></eli@bluewavepolitics.com>	

Eli Oldfield Blue Wave Political Partners, LLC. 401 Znd Ave S Sta 303, Seattle, WA 98104 Office: (206) 682-7328 Cell: (903) 253-6788 Pronouns: They/Them

[Quoted text hidden]

Ashley's Design & Ashley's Design & Ashley's Design & Ashley's Design & Ashley's Design & Ashley's Design & 3' 390 NE MIDWAY BLVD A105 OAK HARBOR, WA 98277 3606822429 http://www.ashleysdesign.com Transaction 202124		Invoice	6704
Dave Paul Campaign	DATE 07/08/2020	PLEASE PAY \$1,026.93	DUE DATE 07/23/2020
Reference ID: 010700	QTY	RATE	AMOUNT
AID: 40	1	0.00	0.00T
Artwork/Setup (Auto/Auto/000000031010 Screen Printing Ath/NtwkNm: VISA Gildan 2000 Ja SIGNATURE VERIFIED Full Front Des Thank you for shapping-locali Full Back De: Representativ Sizes: Payment SZR50CNJN3C62 M20 Clover Privacy Policy L40 https://clover.com/privacy XL 27 XXL8	100 o	9.43	943.00T
Thank yo	SUBTOTAL TAX (8.9%) TOTAL		943.00 83.93 1,026.93
	TOTAL DUE		\$1,026.93
Plaise reimburse			THANK YOU. \$526.93
\$500 paid on			pd 7/9
7/15. I believe deposit of \$\$526.43 was already reinboursed.		B	alancel 1900 00

To care for your items wash inside out in cold water, no bleach, and hang or tumble dry on low. Iron inside out on low.

THANK YOU!!



Fw: Payment confirmation: Invoice 6704 (Ashley's Design & Whidbey Sports)

3 messages

Dave Paul <davepaul1968@hotmail.com> To: Eli Oldfield <eli@bluewavepolitics.com>, beth <beth@votedavepaul.com> Thu, Jul 9, 2020 at 3:04 PM

fyi....I will pay the remainder when we get the T-shirts!

From: QuickBooks Payments <quickbooks@notification.intuit.com> Sent: Thursday, July 9, 2020 12:27 PM To: davepaul1968@hotmail.com <davepaul1968@hotmail.com> Subject: Payment confirmation: Invoice 6704 (Ashley's Design & Whidbey Sports)

quickbooks.

Payment receipt

View invoice: 6704

You paid \$526.93

to Ashley's Design & Whidbey Sports on July 9, 2020

Payment details

Invoice	6704
Invoice Amount	\$1,026.93
Total	\$526.93
Outstanding balance	\$500.00

Status

Partially Paid

Transaction ID

PJ0036291265

Thank you

Ashley's Design & Whidbey Sports

This message was sent to ashleys.sales@gmail.com, as an Intuit customer, consistent with your email preferences. If you have chosen not to receive marketing messages, you will continue to receive business communications about your selected Intuit product(s), which may either affect your service or software, your account, or which may be legally required. If you receive a suspicious email, please report it by forwarding the email to spoof@intuit.com.

🕜 turbotax 🛯 🖞 quickbooks 🛛 proconnect 🕧 mint

Security Privacy statement Terms of Service © 2019 Intuit Inc., All rights reserved. Trademarks. 2800 E. Commerce Center Place, Tucson, AZ 85706

Eli Oldfield <eli@bluewavepolitics.com> To: Dave Paul <davepaul1968@hotmail.com> Cc: beth <beth@votedavepaul.com>

Intuit powering prosperity

prosperity

Thanks! How many t-shirts are you ordering? [Quoted text hidden]

Eli Oldfield Blue Wave Political Partners, LLC. 401 2nd Ave S Ste 303, Seattle, WA 98104 Office: (206) 682-7328 Cell: (903) 253-6788 Pronouns: They/Them



Dave Paul <davepaul1968@hotmail.com> To: Eli Oldfield <eli@bluewavepolitics.com> Cc: beth <beth@votedavepaul.com>

100!

Thu, Jul 9, 2020 at 3:11 PM

Thu, Jul 9, 2020 at 3:12 PM

From: Eli Oldfield <eli@bluewavepolitics.com> Sent: Thursday, July 9, 2020 3:11 PM To: Dave Paul <davepaul1968@hotmail.com> Cc: beth <beth@votedavepaul.com> Subject: Re: Fw: Payment confirmation: Invoice 6704 (Ashley's Design & Whidbey Sports)

[Quoted text hidden]

Photo Safe Deposit^e Datais on back 2 \$ 758,13 19-2/1250 WA 98097 1086 Dollars 710- Judo Date 83 S W. t E TH ave tau Seven Hunda Umburent :1 2 2000057 1 : Bank of America FRIENDS OF DAVE PAUL OAK HARBOR, WA 98277 Pay To The Order Of ACH R/T 125000024 PO BOX 387 Harland Clarke For-

Eli Oldfield <eli@bluewavepolitics.com></eli@bluewavepolitics.com>		Thu, Jul 9, 2020 at 3:04 PM												
	y Sports)					View invoice: 6704	I paid \$526.93 's Design & Whidbey Sports on July 9, 2020		6704	\$1,026.93	\$526.93		\$500.00	Partially Paid
	Fw: Payment confirmation: Invoice 6704 (Ashley's Design & Whidbey Sports) 3 messages	Dave Paul <davepaul1968@hotmail.com> To: Eli Oldfield <eli@bluewavepolitics.com>, beth <beth@votedavepaul.com></beth@votedavepaul.com></eli@bluewavepolitics.com></davepaul1968@hotmail.com>	fyiI will pay the remainder when we get the T-shirts!	From: QuickBooks Payments <quickbooks@notification.intuit.com> Sent: Thursday, July 9, 2020 12:27 PM To: davepaul1968@hotmail.com <davepaul1968@hotmail.com> Subject: Payment confirmation: Invoice 6704 (Ashley's Design & Whidbey Sports)</davepaul1968@hotmail.com></quickbooks@notification.intuit.com>	Construction of the second sec	Payment receipt	You paid \$ to Ashley's Design & Whidb	Payment details	Invoice	Invoice Amount	Total		Outstanding balance	Status
BLUE WAVE	Fw: Payment confi ^{3 messages}	Dave Paul <davepaul1968(To: Eli Oldfield <eli@bluewc< td=""><td>fyiI will pay the rem</td><td>From: QuickBooks Payments <quickbo Sent: Thursday, July 9, 2020 12:27 PM To: davepaul1968@hotmail.com <d Subject: Payment confirmation: Invoic</d </quickbo </td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>t Exhi ge 57</td><td></td><td></td></eli@bluewc<></davepaul1968(fyiI will pay the rem	From: QuickBooks Payments <quickbo Sent: Thursday, July 9, 2020 12:27 PM To: davepaul1968@hotmail.com <d Subject: Payment confirmation: Invoic</d </quickbo 								t Exhi ge 57		

	Payment method	American Express	
	Transaction ID	PJ0036291265	
	Thank you		
	Ashley's Design & Whidbey Sports	idbey Sports	
	This message was sent to ashleys sales@gmail.com, as an Intuit customer, consistent with your email preferences. If you have chosen not to receive marketing messages, you will continue to receive busin communications about your selected Intuit product(s), which may either affect your service or software, account, or which may be legally required. If you receive a suspicious email, please report it by forware the email to spoof@intuit.com.	This message was sent to ashleys sales @gmail.com, as an Intuit customer, consistent with your email preferences. If you have chosen not to receive marketing messages, you will continue to receive business communications about your selected Intuit product(s), which may either affect your service or software, your account, or which may be legally required. If you receive a suspicious email, please report it by forwarding the email to spoof@intuit.com.	
	Security Privacy statement Terms of Service		
	© 2019 Intuit Inc., All rights reserved. Trademarks. 2800 E. Commerce Center Place, Tucson, AZ 85706		
	inruir, powering 📀 turbotax 🕲 quickbooks	uickbooks 🔕 proconnect 🔕 mint	
Eli Oldfield <eli@bluewavepolitics.com> To: Dave Paul <davepaul1968@hotmail.com> Cc: beth beth@votedavepaul.com></davepaul1968@hotmail.com></eli@bluewavepolitics.com>			Thu, Jul 9, 2020 at 3:11 PM
Thanks! How many t-shirts are you ordering? [Quoted text hidden]			
Eli Oldfield Blue Wave Political Partners, LLC. 401 2nd Ave S Ste 303, Seattle, WA 98104 Office: (206) 662-728 Celt: (903) 253-6788 Pronouns: They/Them			
BLUE WAVE PUTTICAL PARTNERS, LLC.			
Dave Paul <davepaul1968@hotmail.com> To: Eli Oldfield <eli@bluewavepolitics.com> Cc: beth <beth@votedavenaul.com></beth@votedavenaul.com></eli@bluewavepolitics.com></davepaul1968@hotmail.com>			Thu, Jul 9, 2020 at 3:12 PM

Dave Paul <davepaul1968@ To: Eli Oldfield <eli@bluewav Cc: beth <beth@votedavepa

100!

From: Eli Oldfield <eli@bluewavepolitics.com> Sent: Thursday, July 9, 2020 3:11 PM To: Dave Paul <davepaul1968@hotmail.com> Cc: beth <beth@votedavepaul.com> Cc: beth <beth@votedavepaul.com> Subject: Re: Fw: Payment confirmation: Invoice 6704 (Ashley's Design & Whidbey Sports)

[Quoted text hidden]

Your Order has been Placed!

Shipping Billing Review 4, Confirmation

Success!

Your order number is: <u>01417654033</u> A confirmation email was sent to: **beth@votedavepaul.com**.

You can review your order by clicking on the order number now or going to the <u>Orders</u> section.

Status: Order Placed

Order Placed: 07/06/2020

Bill To: Dave Paul 2130 Fairway Lane OAK HARBOR, WA 982770387 3603205048 beth@votedavepaul.com

Ship To: Dave Paul 2130 FAIRWAY LN OAK HARBOR, WA 98277-7117 United States 3603205048 beth@votedavepaul.com

Item

Payment: AmericanExpress: ending in 1000 Exp: 06/2025

Qty

Total \$110.00

Order Summary

Subtotal	\$165.00
Shipping	\$1.80
Total:	\$166.80

Continue Shopping

	Enjoy the Great Outdoors SKU: 572804	\$11.00	10	
Forever 55	¢ Sheet of 20			
Availability	: Ships in 5 - 7 business days			

Item		Price	Qty	Total
	Let's Celebrate! SKU: 572504	\$11.00	5	\$55.00
Forever 55	¢ Sheet of 20			
Availability	: Ships in 5 - 7 business day	/S		

Price

Customer Copy Corner Bar and Grill	
Corner Bar & Grill 7601 State Route 20 Anacortes, WA 98221 360.293.8411	
Current Batch: 06142020 Sun 6/14/2020 12:38:21 PM Check 32 Tab L Joaquin G. Station Counter	
VISA XXXXXXXXXXXXXX2146 Approval 04681C	
BASE	\$64.40
TIP	
TOTAL	
Customer Copy	
Thank you for dining at Corner Bar & Grill	

Friends of Dave Paul Transaction Detail By Account September 1 through October 12, 2020

Туре	Date Num	Name	Memo Amo		mount
Deposit	09/03/2020	Anedot	Credit Card Fees	\$	1.30
Check	09/03/2020 AW	Jacob Paul	PPE 8/31 - Salary	\$	27.48
Check	09/03/2020 AW	Tracfone	Telephone	\$	39.88
Deposit	09/04/2020	Anedot	Credit Card Fees	\$	4.30
Deposit	09/09/2020	Anedot	Credit Card Fees	\$	12.90
Deposit	09/10/2020	Anedot	Credit Card Fees	\$	6.10
Deposit	09/10/2020	Anedot	Credit Card Fees	\$	20.80
Check	09/10/2020 AW	USPS	Postage	\$	7.75
Check	09/12/2020 AW	Amazon	Office Supplies	\$	11.92
Check	09/12/2020 AW	USPS	Postage	\$	7.75
Check	09/13/2020 AW	Amazon	Office Supplies	\$	35.70
Deposit	09/14/2020	Anedot	Credit Card Fees	\$	44.00
Check	09/17/2020 AW	Jacob Paul	PPE 9/15 - Salary	\$	27.47
Check	09/18/2020 AW	USPS	Postage	\$	7.75
Check	09/24/2020 AW	USPS	Postage	\$	46.50
Check	09/25/2020 AW	USPS	Postage	\$	7.75
Check	09/26/2020 AW	USPS	Postage	\$	15.50
Check	09/30/2020 1110	Dave Paul	Zoom: Software Rental	\$	16.50
Check	09/30/2020 AW	USPS	Postage	\$	7.75
Check	10/01/2020 AW	USPS	Postage	\$	15.50
Check	10/02/2020 AW	Bailey Shaw	PPE 9/30 - Salary	\$	49.24
Check	10/02/2020 AW	Graham Fulton	PPE 9/30 - Salary	\$	49.24
Check	10/02/2020 AW	Rachel Campbell	PPE 9/30 - Salary	\$	49.24
Check	10/07/2020 AW	Bank of America	Bank Fee	\$	10.00
Check	10/07/2020 AW	USPS	Postage	\$	7.75
Check	10/07/2020 AW	USPS	Postage	\$	7.75
Check	10/09/2020 AW	USPS	Postage	\$	38.75
				\$ 5	576.57

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Friends of Dave Paul PO Box 387 Oak Harbor, WA 98277 josie@bluewavepolitics.com

May 17, 2021

Public Disclosure Commission pdc@pdc.wa.gov

Re: PDC Audit Letter, 2020 Friends of Dave Paul

To Whom It May Concern:

This letter responds to audit request received by the Friends of Dave Paul 2020 campaign committee. Under the direction of Jay Petterson, the campaign treasurer, I have provided responses to the questions in the audit letter.

1. The campaign used both utilized filing software through ORCA and NGP Van Inc. Reports from 1/1/2019-7/27/2020 were filed out of ORCA and reports covering 7/28/2020-12/31/2020 were filed out of NGP. Checks from events were handed to the treasurer's compliance team within 48 hours by the campaign's fundraising team. Checks from the mail were immediately forwarded by the campaign to the treasurer. All checks were entered into the filing software by Blue Wave staff member Eli Oldfield, scanned and uploaded to the campaign's electronic drive, then taken to the bank within five business days of being received by an agent of the campaign. During this process, the compliance team would ensure all required donor information was included, on-file, or otherwise obtained in a timely manner. Any contributions that exceeded the contribution limit were returned or refunded within five business days.

Credit Card contributions were received through a merchant account, Anedot. These contributions settled in the bank account within two business days of the processing date. The online forms required contributors to enter their name, address, employer, occupation, employer city, and employer state. Each C3 report represents a deposit. All contributions were reconciled to the bank account using QuickBooks accounting software, and this process was repeated at least once a week, or more often depending on weekly activity.

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

2. All expenses were approved by the candidate prior to payment. Invoices and requests for payment were either submitted to the treasurer's office from the candidate or were paid on the candidate's campaign debit card. The general consultant, Cerillion N4 Partners, worked with the candidate to create any political advertisements. Once approved, Cerillion N4 Partners facilitated the publication of literature, direct mail, and online advertisements.

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

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

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

Sincerely,

Josie Olsen Blue Wave Political Partners