

MAR 29 2011

Public Disclosure Commission

March 29, 2011

Public Disclosure Commission
Director of Compliance
Phil Stutzman
Email: phil.stutzman@pdc.wa.gov

Dear Mr. Stutzman

We have several disconcerting and perhaps ethical questions about the PDC filings of **Citizens For Safer Streets & Lower Taxes** for the election on Feb 8, 2011 regarding Prop 1 in the city of Yakima, WA.

1. We begin with UNACCOUNTED for cash of \$5,452.90. They report cash contributions of \$17,775.00 and cash expenses of \$12,252.27 and a balance of \$69.83. This leaves \$5,452.90 not accounted for.

2. Bruce Smith is the Vice chair (see C-1pc) of **Citizens For Safer Streets & Lower Taxes** and also the owner of Yakima Valley Publishing. There is the appearance that YVP employee, Dave Flink, and Treasurer of **Citizens For Safer Streets & Lower Taxes** wrote checks to his boss for printing services totaling \$4,074.83. YVP does not have printing equipment. Specifically, refer to C-4 for period of 1/18/11- 1/31/11 first entry on schedule A shows YVP receiving \$2,772.92 for printing costs. Also on C-4 for 2/1/11 - 2/28/11 schedule A, first entry shows YVP receiving \$1,301.91 for printing and campaign services.

3. We also question the in kind radio ads by YVP. How were these ads paid for? Committees and candidates are required to pay CASH up front for media ads in political campaigns. Where is the check written to the radio stations for these ads? Total of \$9,858.

We feel that the reporting by **Citizens For Safer Streets & Lower Taxes** lacks transparency and raises ethical questions regarding payments and IN Kind contributions. We feel that this is an important complaint that needs investigating. Thank you

Ron Bonlender, Blogmaster at "The Other Side On Line"
(theothersideonline.net)

Paul George, Treasurer, Yakima Taxpayers for Accountable Government (YTAG).

Phil Stutzman

From: Ron Bonlender [ron.bonlender@gmail.com]
Sent: Tuesday, March 29, 2011 7:43 AM
To: Phil Stutzman
Cc: Paul George
Subject: Public disclosure re: last election in Yakima, WA
Attachments: PDC complaint March 28.pdf

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Mr Stutzman

Please see attached pdf detailing nature of complaint.

Thank you,

Ron Bonlender, The Other Side Online

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Ron Bonlender
The Other Side Online
212 North 7th Street
Yakima, WA 98901
April 7, 2011

Phil Stutzman
Director of Compliance
Public Disclosure Commission
711 Capitol Way, Room 206
PO Box 40908
Olympia, WA 98504-0908
email: phil.stutzman@pdc.wa.gov

Dear Mr. Stutzman,

On March 29, 2011, I filed a complaint (via email) regarding the PDC filings of the political committee "**Citizens for Safer Streets & Lower Taxes**". Their committee has since resolved one of the issues in that three-part complaint. They amended their C-4 covering the period Dec 1, 2010 through Jan 17, 2011. The complaint showed that they had unaccounted for expenses of \$5,452.90. The corrected C-4 was filed 10 weeks late and although it took them two amendments, at least it accounted for the missing amount.

Unresolved, as yet are the other two questions in the original complaint. Let me recap:

#1 "**Citizens for Safer Streets & Lower Taxes**" reported two payouts to Yakima Valley Publishing (YVP) that we question. One was for \$2,772.92 for "printing costs" on January 20th. The other was for \$1,301.91 on February 4th for "printing and campaign services". Yakima Valley Publishing is owned by committee vice chair Bruce Smith, and does not have printing equipment. We feel the total of \$4,074.83 paid to Mr. Smith lacks legitimacy and openly wonder if some sort of trade out is happening.

#2 Yakima Valley Publishing (YVP) reported "donating" \$9,858 in campaign radio ads carried on stations owned by Townsquare Media and New Northwest Broadcasting (NNW). Mr. Smith listed these on a PDC filing as "in kind contributions" or trade outs on Schedule B of their February 2, 2011 C-4 report.

In a December 4, 2010 email to Aimee Yoerger of Townsquare Media, and to his employee/treasurer, David Flink, Mr. Smith states: "**I intend to donate the already-traded radio advertising to a political action committee that has been established to support Proposition One which is the proposed measure to change Yakima's form of government. This is credit due my company for ads your radio stations have run in our newspapers.**"

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We believe this is an egregious violation of PDC and Federal Communication Commission regulations that require (as we understand) that political advertising be paid in cash. In this transaction, Townsquare, NNW and YVP exchanged invoices titled "2011 Elected Mayor Radio -TRADE". In short, neither Mr. Smith nor the committee paid a single penny for ads listed on those invoices per the station's own affidavits. (Copies are available)

Townsquare has informed us that Mr. Smith "acquired" the trade credits by running ads for Townsquare and NNW radio stations in his bi-monthly newspapers. We strongly question the ethics of exchanging private promotional credits or chits into political campaign advertising. It seems to us these "credits" are for use in promotions among private businesses and charities.

This innovative way of paying for political ads gives the appearance that Townsquare and NNW showing bias toward one political committee over another.

We request the PDC investigate this two-part amended complaint.


Ron Bonlender, theothersideonline.net

P.S. We have also filed a complaint with the FCC against Townsquare and NNW for running these ads without required payment: reference number is 11-C0029556.

Phil Stutzman

From: Ron Bonlender [ron.bonlender@gmail.com]
Sent: Wednesday, April 27, 2011 8:15 AM
To: Phil Stutzman
Subject: re PDC complaint filed March 29 and April 7

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Phil Stutzman

Director of Compliance

Public Disclosure Commission

Email: phil.stutzman@pdc.wa.gov

April 27, 2011

re: PDC complaint dated March 29, 2011 and April 7, 2011

Complaint is in regard to Feb 8, 2011 election campaign for changing the city charter of the city of Yakima.

We view this complaint as a very serious one. The Citizens for Safer Streets & Lower Taxes political action committee have filed \$5,452.90 in expenses 10 weeks late. (Amended twice).

They have questionable payments to the Vice Chair of their committee for printing costs and other "services" totaling \$4,074.83. Are these payments for printing ads that were already donated as IN KInd? We request the PDC investigate these payments.

And they have run \$9,858 in radio ads without paying a single penny. We request the PDC investigate the legality of converting non-cash trades for private promotions into political advertising. Allowing this type of cozy non-cash advertising has all the appearances of showing favoritism toward one political committee or candidates over another. The radio stations can decide who and what they want to trade for free radio ads.

We suggest a remedy of this complaint by barring any future "trades" other than cash for political advertising. We also request that the campaign committee known as Yakima Taxpayers for Accountable Government (YTAG) be awarded a credit of \$9,858 for radio ads to be used should they be involved in any future campaign.

Ron Bonlender, theothersideonline.net

Member of YTAG

Email: ron.bonlender@gmail.com

[509-901-1897](tel:509-901-1897)

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