



## PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112  
Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

To: Members, Washington State Public Disclosure Commission  
From: Lori Anderson, Communications & Training Officer  
Date: July 18, 2013  
Re: Rule Making: Possible Amendments to Form C-4

At the June 2013 meeting, the Commission was informed of potential rule making that may occur during the remaining months of 2013. On the list was a housekeeping amendment to the Summary of Total Contributions & Expenditures Report (PDC Form C-4):

C-4 Report [WAC 390-16-041]: The Summary Of Total Contributions & Expenditures Report (PDC Form C-4) instructs campaigns to report expenditures made directly *or indirectly* to compensate a person or entity for soliciting or procuring signatures and to attach an itemization of the payment. The words *or indirectly* need to be removed from the form – requiring disclosure of indirect payments to signature gatherers was found to be unconstitutional. WIN v. Rippie, 9th Circuit (2000).

Amending a form typically results in changes to filer resources, such as updates to the Commission's electronic filing software, revisions to the instruction materials, etc. In order to limit the number of amendments to a particular form, the staff wants to make sure that all necessary changes are made whenever a form is amended. To that end, the Commission may want to consider making changes to the expenditure codes or other parts of the form.

The expenditure codes were part of the original C-4 form developed in 1992. In an effort to streamline reporting, typical campaign expenditures were assigned a letter code that campaigns could use instead of describing routine expenditures. The only change to the codes since 1992 was the 1993 addition of Code V – voter signature gathering. A copy of the current C-4 form, including expenditure codes, is attached as Attachment 1.

Incorporating the expenditure codes into the Commission's electronic filing software allowed the staff to develop analytical charts for the public. Attachment 2 is an example of one such chart that breaks down, by category, the total 2012 campaign expenditures. The Commission may want to consider changes to the expenditure codes that would allow for more analysis now that the database is available to the public. Possibilities include a new online advertising code or further refining the advertising codes so as to make it possible to discern how advertising dollars are spent: TV, radio, online, outdoor, etc.

Staff will not ask the Commission to take any action at the July meeting. Possible draft amendments to the C-4 will be prepared for discussion at a later meeting, based on direction provided at the July meeting.

Attachments: Attachment 1: C-4 form  
Attachment 2: Chart – 2012 Expenditures by Code

**CAMPAIGN SUMMARY  
 RECEIPTS & EXPENDITURES**

<b>C4</b> <small>(1/12)</small>	<small>PDC OFFICE USE</small>
------------------------------------	-------------------------------

Candidate or Committee Name (Do not abbreviate. Include full name) \_\_\_\_\_

Mailing Address \_\_\_\_\_ City \_\_\_\_\_

Zip + 4	Office Sought (Candidates)	Election Date
Report Period Covered	From (last C-4) To (end of period)	Final Report? Yes <input type="checkbox"/> No <input type="checkbox"/>

**\*For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)?

**RECEIPTS** \*See reverse      Yes       No

- Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) ..... \$ \_\_\_\_\_
- Cash received (From line 2, Schedule A) ..... \$ \_\_\_\_\_
- In kind contributions received (From line 1, Schedule B)..... \_\_\_\_\_
- Total cash and in kind contributions received this period (Line 2 plus 3)..... \_\_\_\_\_
- Loan principal repayments made (From line 2, Schedule L)..... ( ) \_\_\_\_\_
- Corrections (From line 1 or 3, Schedule C)..... Show + or (-) \_\_\_\_\_
- Net adjustments this period (Combine line 5 & 6)..... Show + or (-) \_\_\_\_\_
- Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) ..... \_\_\_\_\_
- Total pledge payments due (From line 2, Schedule B) .....  \_\_\_\_\_

**EXPENDITURES**

- Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) ..... \_\_\_\_\_
- Total cash expenditures (From line 4, Schedule A) ..... \_\_\_\_\_
- In kind expenditures (goods & services) (From line 1, Schedule B) ..... \_\_\_\_\_
- Total cash and in kind expenditures made this period (Line 11 plus line 12)..... \_\_\_\_\_
- Loan principal repayments made (From line 2, Schedule L)..... ( ) \_\_\_\_\_
- Corrections (From line 2 or 3, Schedule C)..... Show + or (-) \_\_\_\_\_
- Net adjustments this period (Combine lines 14 & 15)..... Show + or (-) \_\_\_\_\_
- Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)..... \_\_\_\_\_

**CANDIDATES ONLY**

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**CASH SUMMARY**

- Cash on hand (Line 8 minus line 17) ..... [Line 18 should equal your bank account balance(s) plus your petty cash balance.] \_\_\_\_\_
- Liabilities: (Sum of loans and debts owed) ..... ( ) \_\_\_\_\_
- Balance (Surplus or deficit) (Line 18 minus line 19) ..... \_\_\_\_\_

**Treasurer's Daytime Telephone No.:**  
 ( ) \_\_\_\_\_

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature _____	Date _____	Treasurer's Signature _____	Date _____
-----------------------------	------------	-----------------------------	------------

**Please consult PDC instruction manuals when completing this report.  
Reporting requirements are contained in and governed by RCW 42.17A and WAC 390.**

<b>WHO MUST FILE</b>	Each candidate and political committee using Full Reporting.
<b>FILING DATES</b>	<ol style="list-style-type: none"> <li>1) <u>File with C-1 or C-1pc</u> (Registration form) if you received contributions or made expenditures before registering.</li> <li>2) <u>File on the 10th of each month</u> if contributions or expenditures are over \$200 since last C-4 was filed. (These 10th-of-the-month reports are not required if another C-4 must be filed during that month. See #3 below.)</li> <li>3) For each primary, general and special election in which the candidate or political committee makes an expenditure, file <ul style="list-style-type: none"> <li>• 21 days prior to the election</li> <li>• 7 days prior to the election</li> <li>• 10th of the first month after the election -- see note below</li> </ul> <p>(Note: Not required after primary election from candidates who will be in the general election or from continuing political committees.)</p> </li> <li>4) <u>File final report</u> when campaign is finished or committee closes operation. Often, this coincides with the primary or general post-election, 10th-of-the-month report.</li> </ol> <p>All reports are considered filed as of the postmark date or the date hand-delivered to PDC.</p>
<b>WHERE TO SEND REPORTS</b>	<p>Send original C-4 reports, along with all schedules and attachments, to PDC. Keep a copy for the campaign's records.</p> <p>Candidates for city offices, city ballot issue committees and other political committees who give to city candidates or ballot issue committees should check with city clerk regarding any local filing requirements.</p>
<b>*FOR ALL PACS, POLITICAL PARTIES &amp; CAUCUS POLITICAL COMMITTEES</b>	<p>The question posted near the top of the first page of this form regarding independent expenditures applies to <b>ALL POLITICAL COMMITTEES</b> required to file C-4 reports, <b>except ballot issue committees</b> that neither contribute to candidates nor make independent expenditures regarding them <b>and candidate committees</b> (because they are prohibited from making expenditures that are not directly related to their own campaigns).</p> <p><b>All other Political Committees and PACs must indicate whether they made any independent expenditures supporting or opposing one or more candidates for state or local office.</b></p> <p>If the response is "yes," the independent expenditure(s) <u>MUST</u> be itemized on the appropriate schedule (either Schedule A, or Part 3 of Schedule B), showing:</p> <ul style="list-style-type: none"> <li>• the date of the expense;</li> <li>• the name and address of the vendor or recipient of the funds;</li> <li>• if using Schedule A, an "I" in the Code column;</li> <li>• the name and office sought of the candidate supported or opposed;</li> <li>• an indication of support or opposition; and</li> <li>• a brief description of the expense (e.g., brochure mailed to absentee voters).</li> </ul>

# CASH RECEIPTS AND EXPENDITURE

**SCHEDULE**  
 to C4  
A  
(1/04)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

**1. CASH RECEIPTS (Contributions)** which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
						\$

**2. TOTAL CASH RECEIPTS** Enter also on line 2 of C4 \$

**CODES FOR CLASSIFYING EXPENDITURES:** If one of the following codes is used to describe an expenditure, no other description is generally needed.

The exceptions are:

- 1) **If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;**
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information in the Description block: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE  
DEFINITIONS  
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
 I - Independent Expenditures  
 L - Literature, Brochures, Printing  
 B - Broadcast Advertising (Radio, TV)  
 N - Newspaper and Periodical Advertising  
 O - Other Advertising (yard signs, buttons, etc.)  
 V - Voter Signature Gathering

P - Postage, Mailing Permits  
 S - Surveys and Polls  
 F - Fundraising Event Expenses  
 T - Travel, Accommodations, Meals  
 M - Management/Consulting Services  
 W - Wages, Salaries, Benefits  
 G - General Operation and Overhead

**3. EXPENDITURES**

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown in the Description block of expenses included in the payment..

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
				\$

Total from attached pages \$

**4. TOTAL CASH EXPENDITURES**

Enter also on line 11 of C4 \$

# IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4

# B

(1/04)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

### 1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution*	Fair Market Value	Aggregate Total	P	G	If more than \$100, Employer Name, City, State & Occup.
					R	N	
							Occupation
							Occupation
							Occupation
<input type="checkbox"/> Check here if additional pages are attached.			TOTAL				(Enter also on line 3 and line 12 of C4)

### 2. PLEDGES RECEIVED BUT NOT YET PAID. List each pledge of \$100.00 or more.

Date Notified of Pledge	Name and Address of Pledge Maker	Fair Market Value	Aggregate Total	P	G	If more than \$100, Employer Name, City, State & Occup.
				R	N	
						Occupation
						Occupation
<input type="checkbox"/> Check here if additional pages are attached.		TOTAL (include new pledges above and all other outstanding pledges.)				(Enter also on line 9 of C4)

### 3. ORDERS PLACED, DEBTS, OBLIGATIONS. If debt is owed to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown of expenses included in the debt. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)

Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code	OR	Description of Obligation*
		\$			
		\$			
		\$			
		\$			
		\$			
		\$			
<input type="checkbox"/> Check here if additional pages are attached.		TOTAL			

\*SEE NOTE AND CODE DEFINITIONS ON REVERSE

# EXPENDITURE CODE DEFINITIONS AND USES

## (for use on Schedule A and Schedule B)

**NOTE: Expenditures (including debts) for payments to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company require further detail in the Description block. See expenditure description on Schedule A, WAC 390-16-037 and WAC 390-16-205.**

**C MONETARY, IN-KIND AND EARMARKED CONTRIBUTIONS** your campaign legally makes to other campaigns. Put a "C" in the Code column, in the Description column specify who was benefited and, if in-kind, what was purchased.

**I INDEPENDENT EXPENDITURES** (those expenditures that benefit other candidates or committees but are made independently of them). Put an "I" in the Code column and fully describe purpose.

**L LITERATURE**. Use "L" for expenditures made for the preparation and production of campaign literature and printed solicitations, including expenditures for mailing lists, design, photography, copy, layout, printing and reproduction. Use "P" for literature mailing costs.

**B BROADCAST ADVERTISING**. Use "B" for expenditures associated with the production and purchase of radio and television advertising.

**N NEWSPAPER & PERIODICAL ADVERTISING**. Use "N" for expenditures associated with the production and purchase of advertising in newspapers, periodicals and other publications.

**O OTHER ADVERTISING**. Use "O" for expenditures associated with the production and purchase of advertising on billboards, yard signs and campaign paraphernalia such as buttons, bumper stickers, T-shirts, etc.

**V VOTER SIGNATURE GATHERING**. Use "V" for expenditures made directly or indirectly to compensate a person or entity for soliciting or procuring signatures on a statewide initiative or referendum petition. Attach itemization of each such payment.

**P POSTAGE**. Use "P" for expenditures for stamps, postage, United Parcel Service, Federal Express and direct mail services (postage only). Use "L" for design and other production costs associated with producing campaign literature.

**F FUNDRAISING EVENTS**. Use "F" for expenditures associated with holding a fundraiser, including payments to restaurants, hotels, caterers, other food and refreshment vendors, entertainers and speakers. Use "L" for expenditures for printed matter produced in connection with fundraising events.

**S SURVEYS AND POLLS**. Use "S" for expenditures associated with designing or producing polls, reports on election trends, voter surveys, telemarketing, telephone banks, GOTV drives, etc.

**T TRAVEL, ACCOMMODATIONS, MEALS**. Use "T" for expenditures associated with travel. If vendor has been paid directly, identify the traveler in Description column. If travel payment was made to credit card company or traveler (for out-of-pocket expenses), itemize expenses on separate sheet and attach to Schedule A.

**M MANAGEMENT AND CONSULTING SERVICES**. Use "M" for salaries, fees and commissions paid to campaign management companies and contract consultants, including law firms, whether the person is retained or formally employed by the campaign (for tax withholding purposes).

**W WAGES, SALARIES, BENEFITS**. Use "W" for expenditures associated with hiring campaign employees and other freelance workers who provide miscellaneous services other than campaign management or consulting.

**G GENERAL OPERATION AND OVERHEAD**. Use "G" for general campaign operating expenses and overhead, including filing fees, miscellaneous campaign expenses, headquarters rental, utilities, and purchase or rental of office equipment and furniture for the campaign.

# CORRECTIONS

## SCHEDULE TO C4 **C**

Candidate or Committee Name (Do not abbreviate. Use full name.)

Date

### 1. CONTRIBUTIONS AND RECEIPTS (Include mathematical corrections.)

Date of Report	Contributor's Name or Description of Correction	Amount Reported	Corrected Amount	Difference (+ or -)
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
Total corrections to contributions Enter on line 6 of C4. Show + or (-).				\$

### 2. EXPENDITURES (Include mathematical corrections.)

Date of Report	Vendor's Name or Description of Correction	Amount Reported	Corrected Amount	Difference (+ or -)
		\$	\$	\$
		\$	\$	\$
		\$	\$	\$
Total corrections to expenditures Enter on line 15 of C4. Show + or (-).				\$

### 3. REFUNDS FROM VENDORS

The below listed amounts have been received as refunds on expenditures previously reported. The refund has been deposited and reported on C3 report, Line 1d.

Date of Report	Source/Person Making Refund	Amount of Refund
		\$
		\$
		\$
Total refunds Enter as (-) on line 6 and line 15 of C4.		\$

# LOANS

See Instructions and Example on reverse

**SCHEDULE  
TO C3  
OR C4**

**L**  
(1/12)

Candidate or Committee Name

Report Date

**1. MONETARY OR IN-KIND LOAN RECEIVED.** Loans are considered contributions and are subject to any applicable limit.

Date Loaned	Lender's Name and Address	P R I	G E N	Amount of Loan	Annual Interest Rate	Repayment Schedule	Date Due
If monetary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B.							
						If Total Contributed is more than \$100, Show Lender's Occupation and Name, City & State of Employer	

Name and Address of Each Loan Endorser, Co-Signer	P R I	G E N	Amount Liable For (Same as Loan Amount)	Aggregate Total	If Total Contributed is more than \$100, Show Endorser's Occupation and Name, City, & State of Employer
<input type="checkbox"/> Continued on attached sheet					

**2. LOAN PAYMENTS.** Candidates may be repaid no more than amount loaned or permitted by WAC 390-05-400, whichever is less. See instruction manual.

Date Paid	Lender's Name and Address	Principal Paid	Interest Paid	Total Payment	Balance Owed
		Total Principal Paid Enter also on lines 5 and 14, C-4 report		Total Payments Enter as an expenditure on Schedule A	

**3. LOANS FORGIVEN.**

Date	Lender's Name and Address	Original Amount	Principal Repaid	Amount Forgiven	Balance Owed
------	---------------------------	-----------------	------------------	-----------------	--------------

**4. LOANS STILL OWED.** List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount	Principal Repaid or Forgiven	Amount Owed
------	---------------------------	-----------------	------------------------------	-------------

ATTACHMENT 1 - Page 7 of 7

Subtotal \_\_\_\_\_

New Loans Received (and listed in Item 1 above) \_\_\_\_\_

Total Loans Owed  
Include in total on line 19, C-4 report \_\_\_\_\_

Continued on attached sheet.



**Public Disclosure Commission**  
Shining Light on Washington Politics

- [HOME](#)
- [PUBLIC RESOURCES](#)
- [FILER RESOURCES](#)
- [SEARCH THE DATABASE](#)
- [VIEW ACTUAL REPORTS](#)
- [ONLINE FILING](#)

- [ELECTION TOTALS](#)
- [CANDIDATES](#)
- [COMMITTEES](#)
- [INDEPENDENT EXPENDITURES](#)
- [LOBBYING](#)
- [ADVANCED SEARCH](#)

- [ELECTION TOTALS](#)
- [CANDIDATE TOTALS](#)
- [COMMITTEE TOTALS](#)
- [PARTY PREF: CONTRIBUTIONS](#)
- [PARTY PREF: EXPENDITURES](#)
- [IE TOTALS](#)

**EXPENDITURE TOTALS FOR 2012: \$172,550,301.73**

Election Year:

2012

[Switch to Contribution Totals](#)



Details	Expenditure Types	Amount
Details	B - BROADCAST ADVERTISING	\$18,667,242.25
Details	I - INDEPENDENT EXPENDITURES	\$18,244,695.48
Details	C - CONTRIBUTIONS	\$11,701,778.06
Details	G - GENERAL OPERATION AND OVERHEAD	\$5,714,912.48
Details	M - MANAGEMENT/CONSULTING SERVICES	\$3,633,207.10
Details	W - WAGES, SALARIES, BENEFITS	\$2,833,183.24
Details	L - LITERATURE, BROCHURES, PRINTING	\$1,864,561.17
Details	S - SURVEYS AND POLLS	\$1,196,870.19
Details	F - FUNDRAISING EVENT EXPENSES	\$780,312.95
Details	O - OTHER ADVERTISING	\$705,100.04
Details	P - POSTAGE, MAILING PERMITS	\$522,538.94
Details	T - TRAVEL, ACCOMODATIONS, MEALS	\$416,067.80
Details	N - NEWSPAPER AND PERIODICAL ADVERTISING	\$323,957.68
Details	V - VOTER SIGNATURE GATHERING	\$123.80

