

Respondent Name
Washington Conservation Voters Action Fund PAC
Complainant Name
Glen Morgan
Complaint Description
Glen Morgan (Thu, 30 Dec 2021 at 12:56 PM) To whom it may concern, It has come to my attention, unfortunately, once again that the Washington Conservation Voters Action Fund PAC has committed repetitive and serious violations of Washington State's campaign finance laws (RCW 42.17A) during the 2021 election season. The details are as follows: 1) Failure to provide legally required details on Independent Expenditure Forms (Violation of RCW 42.17A.260(3)(C), WAC 390-16-037) This well-funded PAC, which has the resources to hire professional compliance, legal, and treasurer support and which is very familiar with Washington State's campaign finance laws for decades of political activity still chose to knowingly break the law. This is all the more shocking considering the fact this professional, corporately funded PAC received a formal Written Warning issued by the PDC for previous violations of Washington's Campaign Finance Laws (See attached warning letter – PDC Enforcement Case #42958), and has also been fined \$300 by the PDC for previous similar violations based on complaints I have filed against them (See attached complaints and final settlement documents on PDC Enforcement Case #59657 and Case #59539) This PAC has failed to provide legally required details about these independent expenditures which the law very clearly requires on these reports (See WAC 390-16-037 for specific examples). This is a well-known statute and rule for this corporately funded and very experienced PAC and the political-veterans and professionals hired to manage this PAC know very well. They chose to ignore the law regardless. Not only did this mega PAC fail to provide legally detailed information on their C6 reports as detailed above (and many examples are attached), they also failed to do so in the relevant expenditure reports (C4s). I have helpfully attached the relevant C4 reports for easy PDC staff reference, but as explained before, this PAC has refused to provide adequate details on many of these expenditures – how many texts did they send out? The ad buys are also lacking in details as noted on the attached C6 and C4 reports. WAC 390-16-037 is very clear. The professional crew running this PAC knows the law. They just chose to ignore it, as they have often done in the past. It should be noted that in most cases, this information has been concealed from the public during the critical 21 days of this election. These violations are particularly concerning in light of the fact that the PDC has already issued a Formal Warning to this mega PAC, and they were fined \$300 after that for additional violations, and despite that, they chose to break the law just a few months later. It isn't clear if that Formal Warning and the PDC fine was viewed as a Green Light to break the law, knowing there would be no consequences, or if this PAC just felt that they have enough money, the risk of a fine was so low it didn't even matter. Perhaps they just enjoy mocking the PDC rules. Either way, there isn't much to investigate here. They just need to start complying with the law, for a change and use some of their Mega corporate cash haul to comply with the law. Best Regards, Glen Morgan

What impact does the alleged violation(s) have on the public?
The public has a right to know exactly how many text messages and ad buys this mega corporately funded PAC is buying to buy influence and election results. The public has a right to know the details this PAC is concealing from them. The public has a right to know how shady corporate PACs like this are buying influence with elected officials.
List of attached evidence or contact information where evidence may be found
All are attached, although there might are likely more.
List of potential witnesses
Everyone involved in managing this PAC, particularly the ones who signed off on the last settlement and fine pretending they would try not to violate the law again.
Certification (Complainant)
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

Respondent Name
Washington Conservation Voters Action Fund
Complainant Name
Glen Morgan
Complaint Description
Glen Morgan reported via the portal Sat, 26, 2019 at 2:04PM To whom it may concern, It has come to my attention that Washington Conservation Voters Action Fund PAC has committed egregious, repetitive and serious violations of Washington State's campaign finance laws (RCW 42.17A). 1) Failing to file timely (24hours) Independent Expenditure Reports within 21 days of an election (RCW 42.17A.260(1)(b)(i)) This well-funded PAC, which has the resources to hire professional compliance, legal, and treasurer support and which is very familiar with Washington State's campaign finance laws for decades of political activity still chose to knowingly break the law. This is all the more shocking considering the fact this professional, corporately funded PAC has recently (earlier this year) received a formal Written Warning issued by the PDC for previous violations of Washington's Campaign Finance Laws (See attached warning letter – PDC Enforcement Case #42958). Despite this warning, despite their resources, and despite their experience, they chose to break the law again. Specifically, this PAC filed two different Independent Expenditure Reports during the 2019 election for a local political campaign in Washington State. In total, these two C6s detail \$40,000 of political advertising, which is a substantial sum in a local election, and they spent this money within the crucial 21 days of an election. It appears these ads were run locally in Whatcom County on October 18, 2019, and as you can see from the attached C6s these were not reported until October 23, 2019 – W AY past the statutory deadline of 24hrs after publication. 2) Failure to provide legally required details on Independent Expenditure Forms (Violation of RCW 42.17A.260(3)(C), WAC 390-16-037) This PAC has failed to provide legally required details about these independent expenditures which the law very clearly requires on these reports (See WAC 390-16-037 for specific examples). This is a well-known statute and rule for this corporately funded and very experienced PAC and the political-veterans and professionals hired to manage this PAC know very well. They chose to ignore the law regardless.

3) Failure to provide legally required details on PAC expenditure reports, nor do these reports match the information provided to the PDC in the C6 reports (Violation of RCW 42.17A.235, .240 and WAC 390-16-037)

Not only did this mega PAC fail to provide legally detailed information on their C6 reports as detailed above, they also failed to do so in the relevant expenditure reports (C4). I have attached this report for easy PDC staff reference, but as explained before, this PAC has refused to provide adequate details on this expenditure – who was it for? They also failed to provide the details about what it was (television ads, how many, when did they run? ETc). WAC 390-16-037 is very clear. The professional crew running this PAC knows the law. They just chose to ignore it.

Additionally, it should be noted that there might be a serious discrepancy in the funds reported on this C4 versus the C6s. \$20,000 appears to be missing. The two C6 reports indicate \$40,000 spent, but the C4 only reports \$20,000. For a PAC this size, they may not notice a missing \$20,000, but this is a substantial sum to find and resolve. This information has been concealed from the public during the critical 21 days of this election.

These violations are particularly concerning in light of the fact that the PDC has already issued a Formal Warning to this mega PAC, and despite that, they chose to break the law just a few months after receiving the Warning. It isn't clear if that Formal Warning was viewed as a Green Light to break the law, knowing there would be no consequences, or if this PAC just felt that they have enough money, the risk of a fine was so low it didn't even matter.

Either way, this merits an investigation by the PDC to get to the bottom of this one.

Best Regards,

Glen Morgan

42958 WA Conservation Voters Action Fund Written Warning.pdf
317.41 KB

C4 - WA Con Voters - 100938149 - 10-15-2019 - Sway expenditure.pdf
35.62 KB

C6 - WA Con Voters -9648 - 10-23-19 - late report.pdf
172.95 KB

C6 - WA Con Voters -9646- 10-23-2019 - late report.pdf
172.96 KB

What impact does the alleged violation(s) have on the public?

Even large, well funded corporate PACs like this one should be required to follow the law just like the little guys. Even mega PACs like this one which hire professionals to do everything should be compliant with the law, and they can't be above it. The public has a

right to know the truth about how these large well-funded PAC spend their special interest and corporate dollars...
List of attached evidence or contact information where evidence may be found
See attached and referenced in the complaint
List of potential witnesses with contact information to reach them
All officers, and probably the vendor referenced in the C6 and C4 reports
Certification (Complainant)
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



**State of Washington
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 • Website: www.pdca.wa.gov

January 28, 2019

Delivered electronically to "lennon@wcvoters.org"

Subject: Complaint filed by Bret Uhrich, PDC Case 42958

Dear WA Conservation Voters Action Fund:

Below is a copy of an electronic letter sent to Bret Uhrich concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Bret Uhrich, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet. Staff expects you to provide a mechanism in future political advertising for non-Internet capable devices to access the required sponsor identification disclosures quickly and easily. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director



**State of Washington
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 • Website: www.pdca.wa.gov

January 28, 2019

Delivered electronically to "buhrich@lawschool.gonzaga.edu"

Subject: Complaint regarding WA Conservation Voters Action Fund, PDC Case 42958

Dear Bret Uhrich:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 6, 2018. Your complaint alleged that WA Conservation Voters Action Fund may have violated RCW 42.17A.320 for failure to accurately and completely disclose sponsor identification on text message based political advertising.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by WA Conservation Voters Action Fund; and PDC guidance concerning sponsor identification for text messages issued October 13, 2018, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On November 6, 2018, the WA Conservation Voters Action Fund admits to sending a text message to the number associated with Yvonne Uhrich, soliciting votes in support of candidates Rollins and Wolfe for Snohomish County Public Utility District Commissioners.
- In accordance with WAC 390-18-030(3)(b), and the "one-click" exemption for small online advertising, WA Conservation Voters Action Fund provided a link that recipients with Internet capable phones could click and be taken to a page containing the required sponsor identification disclosures.
- WA Conservation Voters Action Fund cites to the PDC guidance, issued October 13, 2018, concerning text message sponsor identification, but omits the guidance concerning alternative methods for non-Internet capable phones.
- WA Conservation Voters Action Fund did not provide an alternative to receive sponsor identification information for devices not capable of following the link, as provided in the PDC's guidance around sponsor identification in text messaging.

The guidance that WA Conservation Voters Action Fund cited in their response to the allegations states, "[s]ince some phones receiving the text will not be able to follow a link, we suggest campaigns include, in addition to a web address, mechanisms that allow the recipients to request sponsor ID information. Sponsors should make that process as easy as possible, perhaps by allowing the recipient to reply with a single character that then prompts another text message

*with the sponsor ID information. The message would look something like this: 'Go to www.xyzcommittee.com or text *for sponsor information.'"]*

Based on these findings staff has determined that, in this instance, failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet does not amount to an actual violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), WA Conservation Voters Action Fund will receive a formal written warning concerning failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet. The formal written warning will include staff's expectation that WA Conservation Voters Action Fund provides a mechanism in future political advertising for non-Internet capable devices to access the required sponsor identification disclosures quickly and easily. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director

cc: WA Conservation Voters Action Fund

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
100938149

10-15-2019

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

WASHINGTON CONSERVATION VOTERS ACTION FUND

Mailing Address

PO BOX 1907

City

SEATTLE, WA

Zip + 4

98111

Office Sought (Candidates)

Election Date

2019

***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?

Report Period Covered

From (last C-4)

09/01/19

To (end of period)

10/14/19

Final Report?

Yes No **X**

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$104,903.79
2. Cash received (From line 2, Schedule A)	\$	\$131,096.54
3. In kind contributions received (From line 1, Schedule B)		\$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$131,096.54
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$236,000.33
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		\$29,694.24
11. Total cash expenditures (From line 4, Schedule A)		\$104,077.47
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$104,077.47
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$133,771.71

CANDIDATES ONLY	Won	Lost	Unopposed	Name not on ballot
Primary election	☐	☐	☐	☐
General election	☐	☐	☐	☐

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$102,228.62
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$102,228.62

Treasurer's Daytime Telephone No.:

(206) 374-0760

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

SEAN PENDER

10/15/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A

(11/93)

2

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

Report Date

09/01/19 10/14/19

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
09/03/2019	\$1,000.00	09/16/2019	\$1,050.00	09/19/2019	\$16,500.00	
09/06/2019	\$2,500.00	09/18/2019	\$250.00	09/24/2019	\$100,000.00	
09/10/2019	\$250.00	09/11/2019	\$2,245.00	See attached		

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$131,096.54**

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 on an attached sheet: 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 or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting 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	\$123.61
09/19/19	CITIZENS FOR LIBERTY AND LABOR PO Box 18845 Spokane, WA 99228		Contribution	\$10,000.00
10/09/19	RIVETERS COLLECTIVE PAC 1050 Larrabee Ave #104 PMB 462 Bellingham, WA 98225		Contribution	\$10,000.00
10/10/19	RIVETERS COLLECTIVE PAC 1050 Larrabee Ave #104 PMB 462 Bellingham, WA 98225		Contribution	\$2,000.00
10/09/19	SWAY 4350 EAST WEST HWY, STE 350 BETHESDA, MD 20814		Digital Buy	\$20,000.00
09/19/19	VOTE KRISTIN ANG 2411 S 19th St. Tacoma, WA 98405		Contribution	\$1,250.00
09/19/19	COMMITTEE TO ELECT KEITH PO Box 1068 Tacoma, WA 98402		Contribution	\$750.00

Total from attached pages \$ **\$59,953.86**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$104,077.47**

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 3

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

Report Date

09/01/19

10/14/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
09/19/19	COMMITTEE TO ELECT MEGAN DUNN PO Box 2551 Everett, WA 98213		Contribution	\$750.00
09/19/19	PEOPLE TO ELECT BREEAN BEGGS PO Box 4452 Spokane, WA 99220		Contribution	\$1,000.00
09/19/19	PEOPLE TO ELECT BEN STUCKART PO Box 40041 Spokane, WA 99220		Contribution	\$1,000.00
09/19/19	APRIL BARKER FOR BELLINGHAM PO Box 504 Bellingham, WA 98227		Contribution	\$750.00
09/19/19	ELECT ANGELA BIRNEY 7345 164th Ave NE Ste 145 Redmond, WA 98052		Contribution	\$250.00
09/19/19	VOTE SATPAL SIDHU 154 E BARTLETT ROAD LYNDEN, WA 98264		Contribution	\$750.00
09/19/19	MCCLENDON FOR WHATCOM 4682 Wynn Road Bellingham, WA 98226		Contribution	\$750.00
09/08/19	SHELBY ISELER 3436 9TH AVE W SEATTLE, WA 98119		Food reimbursement	\$247.67
10/07/19	HOPKINS & SACHS INC PO BOX 765 SALEM, OR 97308		Consulting	\$54,456.19

Page Total \$ **\$59,953.86**

Attachment to Schedule A Additional Deposits

for the period: **09/01/19** **10/14/19**

4

Name

Date of Deposit	Amount	Date of Deposit	Amount
09/18/19	\$1,000.00		
09/20/19	\$50.00		
10/01/19	\$250.00		
10/14/19	\$5,000.00		
09/20/19	\$1.54		
09/11/19	\$1,000.00		

Reporting Form for: (check one)

Instructions on Page 3

- ☐ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☒ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
PO BOX 1907
SEATTLE, WA 98111

E-mail

BRENDON@WCVOTERS.ORG

Telephone

206-374-0760

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/16/19	10/18/19	SWAY 4350 EAST WEST HWY #350 BETHESDA, MD 20814	DIGITAL VIDEO	20,000.00

Expenditures \$100 or less not itemized above \$ **0.00**

Amount or Value *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	
		\$ 20,000.00
		\$ 40,000.00

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
MCCLENDON, NATALIE	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	☒ ☐	\$ 20,000.00	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) **x** A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature
	Printed Name SEAN PENDER
	Street address PO BOX 1907
	City/State/Zip SEATTLE WA 98111
	Date Signed 10/23/19
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

Reporting Form for: (check one)

Instructions on Page 3

- ☐ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☒ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
PO BOX 1907
SEATTLE, WA 98111

E-mail

BRENDON@WCVOTERS.ORG

Telephone

206-374-0760

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/16/19	10/18/19	SWAY 4350 EAST WEST HWY #350 BETHESDA, MD 20814	DIGITAL VIDEO	20,000.00

Expenditures \$100 or less not itemized above \$ **0.00**

Amount or Value *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	
		\$ 20,000.00
		\$ 20,000.00

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
MCCLENDON, NATALIE	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	☒ ☐	\$ 20,000.00	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) **x** A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature
	Printed Name SEAN PENDER
	Street address PO BOX 1907
	City/State/Zip SEATTLE WA 98111
	Date Signed 10/23/19
	Place Signed (city and county) SEATTLE KING
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	



**State of Washington
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 • Website: www.pdca.wa.gov

January 28, 2019

Delivered electronically to "lennon@wcvoters.org"

Subject: Complaint filed by Bret Uhrich, PDC Case 42958

Dear WA Conservation Voters Action Fund:

Below is a copy of an electronic letter sent to Bret Uhrich concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Bret Uhrich, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet. Staff expects you to provide a mechanism in future political advertising for non-Internet capable devices to access the required sponsor identification disclosures quickly and easily. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director



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January 28, 2019

Delivered electronically to "buhrich@lawschool.gonzaga.edu"

Subject: Complaint regarding WA Conservation Voters Action Fund, PDC Case 42958

Dear Bret Uhrich:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 6, 2018. Your complaint alleged that WA Conservation Voters Action Fund may have violated RCW 42.17A.320 for failure to accurately and completely disclose sponsor identification on text message based political advertising.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by WA Conservation Voters Action Fund; and PDC guidance concerning sponsor identification for text messages issued October 13, 2018, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On November 6, 2018, the WA Conservation Voters Action Fund admits to sending a text message to the number associated with Yvonne Uhrich, soliciting votes in support of candidates Rollins and Wolfe for Snohomish County Public Utility District Commissioners.
- In accordance with WAC 390-18-030(3)(b), and the "one-click" exemption for small online advertising, WA Conservation Voters Action Fund provided a link that recipients with Internet capable phones could click and be taken to a page containing the required sponsor identification disclosures.
- WA Conservation Voters Action Fund cites to the PDC guidance, issued October 13, 2018, concerning text message sponsor identification, but omits the guidance concerning alternative methods for non-Internet capable phones.
- WA Conservation Voters Action Fund did not provide an alternative to receive sponsor identification information for devices not capable of following the link, as provided in the PDC's guidance around sponsor identification in text messaging.

The guidance that WA Conservation Voters Action Fund cited in their response to the allegations states, "[s]ince some phones receiving the text will not be able to follow a link, we suggest campaigns include, in addition to a web address, mechanisms that allow the recipients to request sponsor ID information. Sponsors should make that process as easy as possible, perhaps by allowing the recipient to reply with a single character that then prompts another text message

*with the sponsor ID information. The message would look something like this: 'Go to www.xyzcommittee.com or text *for sponsor information.'"]*

Based on these findings staff has determined that, in this instance, failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet does not amount to an actual violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), WA Conservation Voters Action Fund will receive a formal written warning concerning failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet. The formal written warning will include staff's expectation that WA Conservation Voters Action Fund provides a mechanism in future political advertising for non-Internet capable devices to access the required sponsor identification disclosures quickly and easily. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director

cc: WA Conservation Voters Action Fund



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April 20, 2020

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaints regarding Washington Conservation Voters Action Fund, PDC Cases 59539 and 59657

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on October 26, 2019 and October 30, 2019. The complaints alleged that the Washington Conservation Voters Action Fund, a continuing political committee, may have violated RCW 42.17A.235, .240 and WAC 390-16-037 by failing to completely and accurately disclose expenditure details on the Summary Full Campaign Contribution and Expenditure reports (C-4 reports); and RCW 42.17A.260 and .305 by failing to timely and accurately report independent expenditures and electioneering communications on Independent Spending and Electioneering Communications reports (C-6 reports) during the 2019 election year.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the responses provided by the Washington Conservation Voters Action Fund (Committee); the applicable PDC reports filed by the Committee; and queried the Respondent's data in the PDC contribution and expenditure database to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- The Committee timely filed the C-4 reports due 21-days and 7-days prior to the General Election, disclosing expenditures which lacked the level of detail required by RCW 42.17A.240 and WAC 390-16-037, including a description of purpose sufficient to understand the nature of the expenditure and the number of items printed for political advertising.
- On October 15, 2019, the Committee timely filed the 21-Day Pre-General C-4 report, disclosing an October 7, 2019, expenditure of \$54,456 to Hopkins & Sachs, Inc. for "Consulting," which failed to itemize the \$54,456 expenditure, and an October 9, 2019 expenditure totaling \$20,000 made to SWAY for "digital advertising."
- On October 29, 2019, the Committee timely filed the 7-Day Pre-General C-4 report covering the period beginning October 15 through October 28, 2019, disclosing \$2,625 in contributions received and \$99,065 in expenditures made. The 7-Day Pre-General C-4 report disclosed three expenditures made to Hopkins &

Sachs, Inc., totaling \$26,747 for “Direct Mail,” which failed to provide the number of items printed for political advertising, or who each expenditure supported or opposed, in accordance with RCW 42.17A.240 and WAC 390-16-037.

- On November 14, 2019, the Committee filed an amended 7-Day Pre-General Election C-4 report disclosing expenditures made to Hopkins & Sachs, Inc., totaling \$26,747 for “Direct Mail,” which included two expenditures totaling \$18,027 for two direct mail pieces that supported candidates Satpal Sidhu, a candidate for County Council Member in Whatcom County, Natalie McClendon, a candidate County Council Member in Whatcom County and Carol Frazey, a candidate for County Commissioner for Whatcom County, in the 2019 election year. The other expenditure was for a direct mail piece totaling \$8,720, half of which supported the above-mentioned candidates and the other half opposed candidate Ben Elenbaas, a candidate for County Council Member for Whatcom County in the 2019 election year. The details of the expenditures, including the candidates supported or opposed, were disclosed 16 days late and nine days after the November 5, 2019 general election was held.
- On the same day, November 14, 2019, the Committee also amended the 21-Day Pre-General C-4 report disclosing that: (1) The \$54,456 expenditure to Hopkins & Sachs, Inc., was for direct mail (\$15,156) and for digital printing, advertising and production (\$39,300), all in support of Kristin Ang, a candidate for Port Commission for the Port of Tacoma; and (2) The \$20,000 expenditure made to “SWAY” for digital advertising was in support of Natalie McClendon, a candidate for the County Council Member for Whatcom County in the 2019 election year. The details of the expenditures, including the candidates supported and/or opposed, were disclosed 30 days late and nine days after the 2019 general election was held.
- On December 11, 2019, the Committee filed a C-6 report disclosing a \$15,156 expenditure to Hopkins & Sachs, Inc., for “26,236 pieces of Direct Mail in support of Kristin Ang,” but stated that an additional \$39,000 in expenditures “covered a broad variety of mail, videos, website and other digital communications. All the communications were paid for by the Committee, but only a small fraction mentioned candidates – the rest simply encouraged Washingtonians to vote. The only communication that advocated for candidates was a website, which accounted for \$6,000 of the \$39,300 expenditure. The pro rata attributable costs of the website did not reach the statutory threshold, so we did not include those costs on the Form C-6.”
- On January 6, 2020, the Committee provided PDC staff with an itemization of the \$39,000 expenditure with sub-vendors utilized by the Committee, and amounts of the website attributable to each candidate, but expressed technical difficulties with space limitations to properly report this on C-4 reports.
- On January 31, 2020, the Committee amended its C-4 report to itemize each expenditure with the amount attributable to each candidate supported, and each sub-vendor utilized by the Committee, as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-26-205. The Committee also addressed the C-4 and C-6 reports discrepancy regarding the \$20,000 paid to SWAY in its response. The Committee indicated that it erroneously filed two, identical C-6 reports disclosing a single \$20,000 expenditure made to SWAY for “digital video” on October 16, 2019. Reporting such information twice inadvertently gave the public the false impression that the Committee spent a total of \$40,000. Shortly after the duplicate C-6 report (report# 9648) was filed, the Committee realized its mistake and contacted the PDC on October 23, 2019. The PDC has since resolved the issue of the duplicate C-6 so only a single \$20,000 expenditure now appears online (amended report #9942).

Based on the above review, staff has determined that non-compliance appears to be the result of a good-faith omission or errors by the Committee. According to the Committee, “non-compliance was unintentional, and the result of the delays caused by the unavailability of the primary person responsible for its campaign finance reporting, who was caring that week for a sick family member.” The Committee also indicated that its attempts

to amend C-4 and C-6 reports to include additional expenditure details were frustrated by the 28-character field length limit in the description field of the PDC's online reporting system.

The Committee also made a good faith effort to cure the deficiencies listed in the complaint. After being notified of the complaints on October 26, 2019, and October 30, 2019, the Committee carefully reviewed its PDC reports and subsequently filed three additional C-6 reports (reports #9850, 9906 and 9931) amended ten C-6 reports to disclose previously unreported expenditures, clarified expenditures made and candidates supported, and modified expenditure descriptions to mirror the statutory requirements. The Committee did the same with its C-4 reports that lacked adequate descriptions and/or number of items purchased.

On April 7, 2020, the PDC received a fully executed electronic Statement of Understanding (SOU) signed by Shannon Murphy on behalf of the Committee, along with a \$300 civil penalty payment (received on April 16, 2020). By signing the SOU, the Committee acknowledged violations of RCW 42.17A.235 and .240, by failing to timely and accurately file C-4 reports.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Erick Agina at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov

Sincerely,

Endorsed by:

s/_____
Erick Agina, Compliance Officer

s/_____
Peter Lavalley
Executive Director

cc: WA Conservation Voters Action Fund



Complaint Description

Glen Morgan (Wed, 30 Oct 2019 at 8:32 AM)

To whom it may concern,

It continues to come to my attention (and the attention of anyone who bothers to look at their reporting) that Washington Conservation Voters Action Fund PAC continues to commit egregious, repetitive and serious violations of Washington State's campaign finance laws (**RCW 42.17A**).

1) Failure to provide legally required details on PAC expenditure reports(Violation of RCW 42.17A.235, .240 and WAC 390-16-037)

This well-funded PAC, which has the resources to hire professional compliance, legal, and treasurer support and which is very familiar with Washington State's campaign finance laws for decades of political activity still chose to knowingly break the law. This is all the more shocking considering the fact this professional, corporately funded PAC has recently (earlier this year) received a formal Written Warning issued by the PDC for previous violations of Washington's Campaign Finance Laws (See attached warning letter – **PDC Enforcement Case #42958**).

Not only did this mega PAC fail to provide legally detailed information on their C6 and C4 reports as detailed in my recent complaint filed with the PDC on October 26th, they continue to fail to follow the law in their more recent expenditure reports (C4). I have attached this report (**PDC Tracking # 100942097**) for easy PDC staff reference, but as explained before, this PAC has refused to provide adequate details on most expenditures – who was it for? How many pieces were mailed? WAC 390-16-037 is very clear. The professional crew running this PAC knows the law. They just chose to ignore it.

These violations are particularly concerning in light of the fact that the PDC has already issued a Formal Warning to this mega PAC, and despite that, they chose to break the law just a few months after receiving the Warning. It isn't clear if that Formal Warning was viewed as a Green Light to break the law, knowing there would be no consequences, or if this PAC just felt that they have enough money, the risk of a fine was so low it didn't even matter.

Either way, this merits an investigation by the PDC to get to the bottom of this one.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public and the voters have a right to know how Mega corporately funded PACs like this one spend their campaign cash. Even major PACs who violate the state's campaign finance laws like this one should be eventually obligated to comply with the statute.

List of attached evidence or contact information where evidence may be found.
Two referenced documents attached
List of potential witnesses with contact information to reach them.
All the officers of this PAC and possibly the vendors to verify the information reported is accurate
Complaint Certification:
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
100942097

10-29-2019

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

WASHINGTON CONSERVATION VOTERS ACTION FUND

Mailing Address

PO BOX 1907

City

SEATTLE, WA

Zip + 4

98111

Office Sought (Candidates)

Election Date

2019

***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?

Report Period Covered

From (last C-4)

10/15/19

To (end of period)

10/28/19

Final Report?

Yes No **X**

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$236,000.33
2. Cash received (From line 2, Schedule A)	\$	\$2,625.00
3. In kind contributions received (From line 1, Schedule B)		\$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$2,625.00
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$238,625.33
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		\$133,771.71
11. Total cash expenditures (From line 4, Schedule A)		\$99,064.56
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$99,064.56
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$232,836.27

CANDIDATES ONLY	Won	Lost	Unopposed	Name not on ballot
Primary election	☐	☐	☐	☐
General election	☐	☐	☐	☐

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$5,789.06
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$5,789.06

Treasurer's Daytime Telephone No.:

(206)374-0760

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

SEAN PENDER

10/29/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A

(11/93)

2

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

Report Date

10/15/19

10/28/19

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
10/16/2019	\$25.00					
10/24/2019	\$2,600.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$2,625.00**

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 on an attached sheet: 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 or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting 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	\$81.86
10/16/19	HOPKINS & SACHS INC PO BOX 765 SALEM, OR 97308		Direct mail	\$9,306.98
10/16/19	HOPKINS & SACHS INC PO BOX 765 SALEM, OR 97308		Direct mail	\$8,719.82
10/16/19	SWAY 4350 EAST WEST HWY, STE 350 BETHESDA, MD 20814		Video production	\$4,600.00
10/24/19	FRIENDS OF DAVID FROCKT PO BOX 2114 SEATTLE, WA 98111		Contribution	\$500.00
10/21/19	HOPKINS & SACHS INC PO BOX 765 SALEM, OR 97308		Direct Mail	\$8,719.82
10/17/19	HOPKINS & SACHS INC PO BOX 765 SALEM, OR 97308		Direct Mail	\$8,286.76

Total from attached pages \$ **\$58,849.32**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$99,064.56**

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 3

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

Report Date

10/15/19

10/28/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
10/17/19	HOPKINS & SACHS INC PO BOX 765 SALEM, OR 97308		Direct mail	\$13,903.50
10/28/19	THE KENNEDY FUND 3518 FREMONT AVE N #545 SEATTLE, WA 98103		Contribution	\$2,500.00
10/28/19	FUSE VOTES 1402 THIRD AVENUE, STE 310 SEATTLE, WA 98101		Progressive voter guide support	\$6,600.00
10/28/19	ECKROSH MARKETING 6107 SW MURRAY BLVD #421 BEAVERTON, OR 97008		Digital ad placement services	\$35,000.00
10/28/19	WASHINGTON CONSERVATION VOTERS 1402 3RD AVE #1400 SEATTLE, WA 98101		Staff time (in kind to Kristin Ang)	\$162.54
10/28/19	WASHINGTON CONSERVATION VOTERS 1402 3RD AVE #1400 SEATTLE, WA 98101		Staff time (in kind to Kristina Walker)	\$54.18
10/28/19	WASHINGTON CONSERVATION VOTERS 1402 3RD AVE #1400 SEATTLE, WA 98101		Staff time (In kind to Megan Dunn)	\$54.18
10/28/19	WASHINGTON CONSERVATION VOTERS 1402 3RD AVE #1400 SEATTLE, WA 98101		Staff time (in kind to April Barker)	\$100.79
10/28/19	WASHINGTON CONSERVATION VOTERS 1402 3RD AVE #1400 SEATTLE, WA 98101		Staff time (in kind to Karen Howe)	\$83.67
10/28/19	WASHINGTON CONSERVATION VOTERS 1402 3RD AVE #1400 SEATTLE, WA 98101		Staff time (in kind to Karen McKnight)	\$83.67
10/28/19	WASHINGTON CONSERVATION VOTERS 1402 3RD AVE #1400 SEATTLE, WA 98101		Staff time (in kind to Rituja Indapure)	\$83.67
10/28/19	WASHINGTON CONSERVATION VOTERS 1402 3RD AVE #1400 SEATTLE, WA 98101		staff time (in kind to Vanessa Kritzer)	\$167.34

Page Total \$ **\$58,793.54**

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 4

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

Report Date

10/15/19

10/28/19

[illegible]

Page Total \$ **\$55.78**



**State of Washington
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January 28, 2019

Delivered electronically to "lennon@wcvoters.org"

Subject: Complaint filed by Bret Uhrich, PDC Case 42958

Dear WA Conservation Voters Action Fund:

Below is a copy of an electronic letter sent to Bret Uhrich concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Bret Uhrich, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet. Staff expects you to provide a mechanism in future political advertising for non-Internet capable devices to access the required sponsor identification disclosures quickly and easily. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director



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January 28, 2019

Delivered electronically to "buhrich@lawschool.gonzaga.edu"

Subject: Complaint regarding WA Conservation Voters Action Fund, PDC Case 42958

Dear Bret Uhrich:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 6, 2018. Your complaint alleged that WA Conservation Voters Action Fund may have violated RCW 42.17A.320 for failure to accurately and completely disclose sponsor identification on text message based political advertising.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by WA Conservation Voters Action Fund; and PDC guidance concerning sponsor identification for text messages issued October 13, 2018, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On November 6, 2018, the WA Conservation Voters Action Fund admits to sending a text message to the number associated with Yvonne Uhrich, soliciting votes in support of candidates Rollins and Wolfe for Snohomish County Public Utility District Commissioners.
- In accordance with WAC 390-18-030(3)(b), and the "one-click" exemption for small online advertising, WA Conservation Voters Action Fund provided a link that recipients with Internet capable phones could click and be taken to a page containing the required sponsor identification disclosures.
- WA Conservation Voters Action Fund cites to the PDC guidance, issued October 13, 2018, concerning text message sponsor identification, but omits the guidance concerning alternative methods for non-Internet capable phones.
- WA Conservation Voters Action Fund did not provide an alternative to receive sponsor identification information for devices not capable of following the link, as provided in the PDC's guidance around sponsor identification in text messaging.

The guidance that WA Conservation Voters Action Fund cited in their response to the allegations states, "[s]ince some phones receiving the text will not be able to follow a link, we suggest campaigns include, in addition to a web address, mechanisms that allow the recipients to request sponsor ID information. Sponsors should make that process as easy as possible, perhaps by allowing the recipient to reply with a single character that then prompts another text message

*with the sponsor ID information. The message would look something like this: 'Go to www.xyzcommittee.com or text *for sponsor information.'"]*

Based on these findings staff has determined that, in this instance, failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet does not amount to an actual violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), WA Conservation Voters Action Fund will receive a formal written warning concerning failure to provide an adequate avenue for voters to receive sponsor identification without connection to the Internet. The formal written warning will include staff's expectation that WA Conservation Voters Action Fund provides a mechanism in future political advertising for non-Internet capable devices to access the required sponsor identification disclosures quickly and easily. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director

cc: WA Conservation Voters Action Fund

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
110054632

10-12-2021

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

WASHINGTON CONSERVATION VOTERS ACTION FUND

Mailing Address

1402 3rd Ave #1400

City

SEATTLE, WA

Zip + 4

98101

Office Sought (Candidates)

Election Date

2021

***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?

Report Period Covered

From (last C-4)

09/01/21

To (end of period)

10/11/21

Final Report?

Yes No **X**

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$128,513.50
2. Cash received (From line 2, Schedule A)	\$	\$78,615.00
3. In kind contributions received (From line 1, Schedule B)		\$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$78,615.00
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$207,128.50
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		\$1,260.46
11. Total cash expenditures (From line 4, Schedule A)		\$81,257.61
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$81,257.61
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$82,518.07

CANDIDATES ONLY	Won	Lost	Unopposed	Name not on ballot
Primary election	☐	☐	☐	☐
General election	☐	☐	☐	☐

Treasurer's Daytime Telephone No.:

(206)374-0760

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$124,610.43
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$124,610.43

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

SEAN PENDER

10/12/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A

(11/93)

2

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

Report Date

09/01/21

10/11/21

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
09/07/2021	\$24,000.00	09/21/2021	\$4,000.00	10/04/2021	\$5,615.00	
09/13/2021	\$35,000.00	09/23/2021	\$1,000.00	09/07/2021	\$2,000.00	
09/16/2021	\$5,000.00	09/25/2021	\$2,000.00			

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$78,615.00**

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 on an attached sheet: 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 or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting 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	\$198.37
10/06/21	GREENWOOD OHLUND 4241 21st Ave W, Ste 400 Seattle, WA 98199		accounting services	\$2,000.00
09/30/21	HOPKINS & SACHS INC 600 N 36th St Seattle, WA 98103		Digital media production	\$7,000.00
09/30/21	HOPKINS & SACHS INC 600 N 36th St Seattle, WA 98103		Digital Ad placement 1/2 each Mary Bacon, Elizabeth Pew. Support.	\$45,000.00
09/20/21	HOUSE DEMOCRATIC CAMPAIGN 4130 1ST AVENUE SOUTH, SUITE D SEATTLE, WA 98134		Contribution	\$1,000.00
10/05/21	OUR VOTES COUNT 1402 3RD AVE, STE. 406 SEATTLE, WA 98101		Contribution	\$15,000.00
09/20/21	FRIENDS OF MR HERRERA P.O Box 829 Yakima, WA 98907		Contribution	\$250.00

Total from attached pages \$ **\$10,809.24**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$81,257.61**

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)Page **3**

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

Report Date

09/01/21**10/11/21**

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
09/20/21	FRIENDS OF JARED MEAD PO BOX 13924 MILL CREEK, WA 98082		contribution	\$250.00
09/20/21	PEOPLE FOR MICHAEL SHEPARD 2516 KULSHAN ST BELLINGHAM, WA 98225		Contribution	\$250.00
09/20/21	FRIENDS OF REBECCA LEWIS PO Box 266 Deming, WA 98244		Contribution	\$250.00
09/20/21	ELECT SARAH PERRY 1420 NW Gilman BLVD, #2824 Issaquah, WA 98027		Contribution	\$250.00
09/20/21	SAMUEL JOHNSON P.O. Box 8067 Yakima, WA 98908		Contribution	\$250.00
09/20/21	FRIENDS OF ZACK ZAPPONE P.O. Box 48697 Spokane, WA 99208		Contribution	\$500.00
09/20/21	FRIENDS OF DOW CONSTANTINE PO BOX 16285 SEATTLE, WA 98116		Contribution	\$250.00
09/20/21	FRIENDS OF BRANDY DONAGHY PO Box 12572 Mill Creek, WA 98082		Contribution	\$750.00
09/20/21	ELECT DIANA PEREZ 3021 NE 72nd Dr, STE 9, PMB 300 Vancouver, WA 98661		Contribution	\$500.00
09/20/21	ERIC FOR PORT 3021 NE 72nd Dr, STE D #303 Vancouver, WA 98661		Contribution	\$500.00
09/20/21	ELECT KELLY KRIEGER P.O. Box 30845 Bellingham, WA 98228		Contribution	\$500.00
09/20/21	FRIENDS OF TOSHIKO HASEGAWA 401 2nd Ave S STE 303 Seattle, WA 98104		Contribution	\$750.00

Page Total \$ **\$5,000.00**

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 4

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

Report Date

09/01/21

10/11/21

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
09/20/21	VOTE KIM HARLESS P.O. Box 2682 Vancouver, WA 98668		Contribution	\$750.00
09/20/21	FRIENDS OF KIM-KHANH VAN PO Box 1246 Renton, WA 98057		Contribution	\$750.00
09/20/21	NAGHMANA SHERAZI 6325 N. Monroe St. #28984 Spokane, WA 99208		Contribution	\$750.00
09/20/21	FRIENDS OF HAMDI P.O. Box 69383 Seatac, WA 98168		contribution	\$750.00
09/20/21	WIREMAN4RICHLAND 8220 West Gage Bl. #148 Kennewick, WA 99336		Contribution	\$500.00
09/07/21	CLICK AND PLEDGE 2200 KRAFT DRIVE, SUITE 1175 BLACKSBURG, VA 24060		Credit card fees	\$76.87
09/23/21	CLICK AND PLEDGE 2200 KRAFT DRIVE, SUITE 1175 BLACKSBURG, VA 24060		Credit card fees	\$151.87
09/28/21	CLICK AND PLEDGE 2200 KRAFT DRIVE, SUITE 1175 BLACKSBURG, VA 24060		Credit card fees	\$76.87
10/07/21	CLICK AND PLEDGE 2200 KRAFT DRIVE, SUITE 1175 BLACKSBURG, VA 24060		Credit card fees	\$212.42
09/30/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101		Staff time (in kind contribution to Our Votes Count)	\$375.00
10/11/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101		Staff time	\$1,328.21
10/11/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101		Staff time (in kind expense to Nikkita Oliver)	\$88.00

Page Total \$ **\$5,809.24**

Reporting Form for: (check one)

Instructions on Page 3

- ☐ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☒ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
PO BOX 1907
SEATTLE, WA 98111

E-mail

Telephone

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/26/21	10/27/21	UPPER LEFT STRATEGIES PO BOX 4231 SEATTLE, WA 98194	DIGITAL AD: PRO R LEWIS	10,000.00

Expenditures \$100 or less not itemized above \$ 0.00

Amount or Value	Total this report
	\$ 10,000.00
*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.
	\$ 125,085.97

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Rebecca Lewis,	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	☒ ☐	\$ 10,000.00	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature
	Printed Name SEAN PENDER
	Street address 1402 3RD AVE #1400
	City/State/Zip SEATTLE WA 98101
	Date Signed 10/27/21
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
110065037
AMENDS
110058600
12-10-2021

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

WASHINGTON CONSERVATION VOTERS ACTION FUND

Mailing Address

1402 3rd Ave #1400

City

SEATTLE, WA

Zip + 4

98101

Office Sought (Candidates)

Election Date

2021

***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?

Report Period Covered

From (last C-4)

10/12/21

To (end of period)

10/25/21

Final Report?

Yes No **X**

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$207,128.50
2. Cash received (From line 2, Schedule A)	\$	\$1.31
3. In kind contributions received (From line 1, Schedule B)		\$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$1.31
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$207,129.81
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		\$82,518.07
11. Total cash expenditures (From line 4, Schedule A)		\$70,754.40
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$70,754.40
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$153,272.47

CANDIDATES ONLY	Won	Lost	Unopposed	Name not on ballot
Primary election	☐	☐	☐	☐
General election	☐	☐	☐	☐

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$53,857.34
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$53,857.34

Treasurer's Daytime Telephone No.:

(206)374-0760

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

SEAN PENDER

12/10/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A

(11/93)

2

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

Report Date

10/12/21

10/25/21

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
10/20/2021	\$1.31					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$1.31**

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 on an attached sheet: 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 or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting 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	\$198.00
10/25/21	HOPKINS & SACHS INC 600 N 36th St Seattle, WA 98103	I	Digital Media Ads: Pro M. Bacon & Pro E. Pew	\$10,000.00
10/25/21	THE SEXTON GROUP 321 N CLARK ST 5TH FLOOR CHICAGO, IL 60654	I	Phone calls: Pro Labrant, pro Perez, pro Harless	\$16,214.20
10/21/21	UPPER LEFT STRATEGIES PO Box 4231 Seattle, WA 98194	I	Mailer and postage for 12,466 pcs. Pro R. Lewis	\$9,193.75
10/13/21	UPPER LEFT STRATEGIES PO Box 4231 Seattle, WA 98194	I	Digital ad placement--pro R. Lewis	\$10,000.00
10/16/21	HOPKINS & SACHS INC 600 N 36th St Seattle, WA 98103	I	Direct mail: 8779 pieces. Pro M. Bacon, Pro E. Pew	\$6,827.82
10/16/21	LORENA GONZALEZ 4456 44TH AVE SW #2 SEATTLE, WA 98116		Contribution	\$300.00

Total from attached pages \$ **\$18,020.63**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$70,754.40**

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 3

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

Report Date

10/12/21

10/25/21

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
10/22/21	STONES PHONES 41-750 RANCHO LAS PALMAS RD RANCHO MIRAGE, CA 92770	I	Texts: 7195 texts, pro Sherazi, pro Zappone	\$791.45
10/25/21	UPPER LEFT STRATEGIES PO Box 4231 Seattle, WA 98194	I	Mailer: 12,466 pcs. Pro R. Lewis	\$4,757.51
10/13/21	UPPER LEFT STRATEGIES PO Box 4231 Seattle, WA 98194	I	Postage: Pro R. Lewis, 12,466 pcs	\$4,562.55
10/25/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101		texting service: in kind to K. Harless	\$155.00
10/25/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101		texting service: in kind to G. Wireman	\$450.00
10/25/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101		texting service: in kind to H. Mohamed	\$1,000.00
10/25/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101		texting service: in kind to E. LaBrant	\$100.00
10/25/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101		texting service: in kind to D. Perez	\$100.00
10/25/21	UPPER LEFT STRATEGIES PO Box 4231 Seattle, WA 98194	I	Postage: 12,466 pcs pro R. Lewis	\$4,562.55
10/25/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101		Staff time spent on PAC activities	\$1,541.57

Page Total \$ **\$18,020.63**

Reporting Form for: (check one)

Instructions on Page 3

- ☒ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☐ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

ONEAMERICA VOTES JUSTICE FUND
1225 S WELLER ST STE 200
SEATTLE, WA 98144

E-mail

SAMARA@OAVOTES.ORG

Telephone

206-569-5702

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
09/29/21	09/29/21	ONEAMERICA VOTES 1225 S WELLER ST STE 430 SEATTLE, WA 98144	STAFF TIME	1,070.54

Expenditures \$100 or less not itemized above \$ 0.00

Amount or Value *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	\$ 1,070.54
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 1,070.54

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Shukri Olow,	COUNTY COUNCIL MEMBER/KING CO	NON PARTISAN	☒ ☐	\$ 356.84	\$ 356.84
Toshiko Hasegawa,	PORT COMMISSIONER/PORT OF SEATTLE	NON PARTISAN	☒ ☐	\$ 356.85	\$ 356.85
Hamdi Mohamed,	PORT COMMISSIONER/PORT OF SEATTLE	NON PARTISAN	☒ ☐	\$ 356.85	\$ 356.85
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ☐ An individual using only personal funds.
- b) ☐ An individual using personal funds and/or funds received from others.
- c) ☐ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ☐ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ☐ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ☐ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature
	Printed Name JASON BENNETT
	Street address PO BOX 9100
	City/State/Zip SEATTLE WA 98109
	Date Signed 10/04/21
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

Reporting Form for: (check one)

Instructions on Page 3

- ☐ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☒ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
 PO BOX 1907
 SEATTLE, WA 98111

E-mail

Telephone

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/11/21	10/15/21	HOPKINS & SACHS 600 N 36TH ST #428 SEATTLE, WA 98103	DIGITAL AD PRODUCTION & BUY	52,000.00

Expenditures \$100 or less not itemized above \$ 0.00

Amount or Value	Total this report
*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	\$ 52,000.00
Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 52,000.00

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Mary M. Bacon,	PORT COMMISSIONER/PORT OF TACOMA	NON PARTISAN	☒ ☐	\$ 26,000.00	\$ 0.00
Elizabeth Pew,	PORT COMMISSIONER/PORT OF TACOMA	NON PARTISAN	☒ ☐	\$ 26,000.00	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication			
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature		Printed Name
			SEAN PENDER
	Street address		
	1402 3RD AVE #1400		
	City/State/Zip		
	SEATTLE		WA 98101
	Date Signed	Place Signed (city and county)	
	10/14/21	SEATTLE KING	
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."			

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
110065652

12-10-2021

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

WASHINGTON CONSERVATION VOTERS ACTION FUND

Mailing Address

1402 3rd Ave #1400

City

SEATTLE, WA

Zip + 4

98101

Office Sought (Candidates)

Election Date

2021

***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?

Report Period Covered

From (last C-4)

10/26/21

To (end of period)

11/30/21

Final Report?

Yes No **X**

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$207,129.81
2. Cash received (From line 2, Schedule A)	\$	\$45,001.82
3. In kind contributions received (From line 1, Schedule B)		\$1,995.83
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$46,997.65
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$254,127.46
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		\$153,272.47
11. Total cash expenditures (From line 4, Schedule A)		\$22,089.03
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$1,995.83
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$24,084.86
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$177,357.33

CANDIDATES ONLY

Name not

	Won	Lost	Unopposed	on ballot
Primary election	☐	☐	☐	☐
General election	☐	☐	☐	☐

Treasurer's Daytime Telephone No.:

(206)374-0760

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$76,770.13
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$76,770.13

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

SEAN PENDER

12/10/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A

(11/93)

2

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

Report Date

10/26/21

11/30/21

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
11/05/2021	\$20,000.00					
11/28/2021	\$25,000.00					
11/19/2021	\$1.82					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$45,001.82**

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 on an attached sheet: 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 or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting 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	\$212.00
10/26/21	UPPER LEFT STRATEGIES PO Box 4231 Seattle, WA 98194	I	Digital Media purchase-pro R Lewis	\$10,000.00
11/01/21	THE SEXTON GROUP 321 N CLARK ST 5TH FLOOR CHICAGO, IL 60654	I	Texting services	\$6,249.85
10/29/21	THE SEXTON GROUP 321 N CLARK ST 5TH FLOOR CHICAGO, IL 60654	I	Phone calls-pro Rebecca Lewis	\$800.00
10/26/21	GETTHRU PO Box 2690 Alameda, CA 94501	I	Texting services-Pro R. Lewis	\$694.49
11/15/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101		Staff time spent on election activities	\$459.00
10/31/21	GETTHRU PO Box 2690 Alameda, CA 94501	I	Texting services- E Pew & M Bacon	\$386.16

Total from attached pages \$ **\$3,287.53**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$22,089.03**

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 3

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

Report Date

10/26/21

11/30/21

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
10/29/21	GETTHRU PO Box 2690 Alameda, CA 94501	I	Texting services-Pro R Lewis	\$574.24
10/29/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101	I	Staff time texting: Pro R Lewis	\$88.00
10/27/21	GETTHRU PO Box 2690 Alameda, CA 94501	I	Texting services: In support of E Pew and M Bacon	\$1,672.58
10/27/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101	I	Staff time: Texting in support of E Pew & M Bacon	\$88.00
10/29/21	GETTHRU PO Box 2690 Alameda, CA 94501	I	Texting services: Pro E Labrant, D Perez, K Harless	\$202.47
10/30/21	GETTHRU PO Box 2690 Alameda, CA 94501	I	Texting services: Pro R. Lewis	\$574.24
10/30/21	WASHINGTON CONSERVATION VOTERS 1402 3rd Ave #1400 Seattle, WA 98101	I	Staff time spent texting in support of R Lewis	\$88.00

Page Total \$ **\$3,287.53**

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
10/30/21	LEAD LOCALLY 1014 TORNEY AVE SAN FRANCISCO, CA 94129	texting services: Pro E Pew & M Bacon	\$1,995.83	\$1,995.83			
		TOTAL THIS PAGE	\$1,995.83				

Reporting Form for: (check one)

Instructions on Page 3

- ☐ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☒ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
 PO BOX 1907
 SEATTLE, WA 98111

E-mail

Telephone

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/25/21	10/26/21	HOPKINS & SACHS 600 N 34TH ST #428 SEATTLE, WA 98103	DIGITAL ADS:PRO BACON & PEW	10,000.00

Expenditures \$100 or less not itemized above \$ 0.00

Amount or Value

*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.

Total this report \$ 10,000.00
 Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.
 \$ 114,347.48

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Elizabeth Pew,	PORT COMMISSIONER/PORT OF TACOMA	NON PARTISAN	☒ ☐	\$ 5,000.00	\$ 0.00
Mary M. Bacon,	PORT COMMISSIONER/PORT OF TACOMA	NON PARTISAN	☒ ☐	\$ 5,000.00	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication			
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature		Printed Name
			SEAN PENDER
	Street address		
	1402 3RD AVE #1400		
	City/State/Zip		
	SEATTLE		WA 98101
	Date Signed	Place Signed (city and county)	
	10/26/21	SEATTLE KING	
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."			

Reporting Form for: (check one)

Instructions on Page 3

- ☒ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☐ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
 PO BOX 1907
 SEATTLE, WA 98111

E-mail

Telephone

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/31/21	10/31/21	THRUTEXT 1330 BROADWAY - 3RD FLOOR OAKLAND, CA 94612	TEXTING SERVICES	386.16

Expenditures \$100 or less not itemized above \$ **44.00**

Amount or Value

*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.

Total this report \$ **430.16**

Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.
 \$ **11,800.08**

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Mary M. Bacon,	PORT COMMISSIONER/PORT OF TACOMA	NON PARTISAN	☒ ☐	\$ 215.08	\$ 0.00
Elizabeth Pew,	PORT COMMISSIONER/PORT OF TACOMA	NON PARTISAN	☒ ☐	\$ 215.08	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Continued on attached sheet ☐

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.

Signature

Printed Name

SEAN PENDER

Street address

1402 3RD AVE #1000

City/State/Zip

SEATTLE**WA 98101**

Date Signed

10/29/21

Place Signed (city and county)

SEATTLE KING

*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

Reporting Form for: (check one)

Instructions on Page 3

- ☒ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☐ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
 PO BOX 1907
 SEATTLE, WA 98111

E-mail

Telephone

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/26/21	10/27/21	THRUTALK 1330 BROADWAY - 3RD FLOOR OAKLAND, CA 94612	TEXTING TOOL: PRO R. LEWIS	694.49

Expenditures \$100 or less not itemized above \$ **44.00**

Amount or Value *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	
		\$ 738.49
		\$ 115,085.97

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Rebecca Lewis,	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	☒ ☐	\$ 738.49	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature
	Printed Name SEAN PENDER
	Street address 1402 3RD AVE #1400
	City/State/Zip SEATTLE WA 98101
	Date Signed 10/27/21
	Place Signed (city and county) SEATTLE KING
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

Reporting Form for: (check one)

Instructions on Page 3

- ☐ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☒ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
 PO BOX 1907
 SEATTLE, WA 98111

E-mail

Telephone

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/26/21	10/27/21	UPPER LEFT STRATEGIES PO BOX 4231 SEATTLE, WA 98194	DIGITAL AD: PRO R LEWIS	10,000.00

Expenditures \$100 or less not itemized above \$ 0.00

Amount or Value *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	
		\$ 10,000.00
		\$ 125,085.97

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Rebecca Lewis,	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	☒ ☐	\$ 10,000.00	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature
	Printed Name SEAN PENDER
	Street address 1402 3RD AVE #1400
	City/State/Zip SEATTLE WA 98101
	Date Signed 10/27/21
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

Reporting Form for: (check one)

Instructions on Page 3

- ☒ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☐ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
 PO BOX 1907
 SEATTLE, WA 98111

E-mail

Telephone

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/30/21	10/30/21	THRUTEXT 1330 BROADWAY - 3RD FLOOR OAKLAND, CA 94612	TEXTING SERVICES	574.24

Expenditures \$100 or less not itemized above \$ 88.00

Total this report \$ 662.24

Amount or Value

*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.

Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.
 \$ 11,369.92

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Rebecca Lewis,	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	☒ ☐	\$ 662.24	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication			
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature		Printed Name
			SEAN PENDER
	Street address		
	1402 3RD AVE #1400		
	City/State/Zip		
	SEATTLE		WA 98101
	Date Signed	Place Signed (city and county)	
	10/29/21	SEATTLE KING	
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."			

Reporting Form for: (check one)

Instructions on Page 3

- ☒ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☐ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
PO BOX 1907
SEATTLE, WA 98111

E-mail

Telephone

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/30/21	10/30/21	LEAD LOCALLY PO BOX 29229 SAN FRANCISCO, CA 94129	TEXTING SERVICES	1,995.83

Expenditures \$100 or less not itemized above \$ 0.00

Total this report \$ 1,995.83

Amount or Value

*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.

Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.

\$ 20,045.76

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Mary M. Bacon,	PORT COMMISSIONER/PORT OF TACOMA	NON PARTISAN	☒ ☐	\$ 997.92	\$ 0.00
Elizabeth Pew,	PORT COMMISSIONER/PORT OF TACOMA	NON PARTISAN	☒ ☐	\$ 997.91	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
 b) ___ An individual using personal funds and/or funds received from others.
 c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
 d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
 e) **x** A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
 f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
 g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.

Signature

Printed Name

SEAN PENDER

Street address

1402 3RD AVE #1400

City/State/Zip

SEATTLE**WA 98101**

Date Signed

11/01/21

Place Signed (city and county)

SEATTLE KING

*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

Reporting Form for: (check one)

Instructions on Page 3

- ☒ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☐ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
 PO BOX 1907
 SEATTLE, WA 98111

E-mail

Telephone

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/29/21	10/29/21	THRUTEXT 1330 BROADWAY - 3RD FLOOR OAKLAND, CA 94612	TEXTING SERVICES	202.47

Expenditures \$100 or less not itemized above \$ **44.00**

Total this report \$ **246.47**

Amount or Value

*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.

Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.
 \$ **10,707.68**

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
LABRANT, ERIC	PORT COMMISSIONER/PORT OF VANCOUVER	NON PARTISAN	☒ ☐	\$ 82.16	\$ 0.00
PEREZ, DIANA	CITY COUNCIL MEMBER/CITY OF VANCOUVER	NON PARTISAN	☒ ☐	\$ 82.16	\$ 0.00
HARLESS, KIM	CITY COUNCIL MEMBER/CITY OF VANCOUVER	NON PARTISAN	☒ ☐	\$ 82.15	\$ 0.00
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature
	Printed Name SEAN PENDER
	Street address 1402 3RD AVE #1400
	City/State/Zip SEATTLE WA 98101
	Date Signed 10/29/21
	Place Signed (city and county) SEATTLE KING
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

Reporting Form for: (check one)

Instructions on Page 3

- ☐ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
☒ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor:

WASHINGTON CONSERVATION VOTERS ACTION FUND
 PO BOX 1907
 SEATTLE, WA 98111

E-mail

Telephone

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/12/21	10/18/21	UPPER LEFT STRATEGIES PO BOX 4231 SEATTLE, WA 98194	DIGITAL AD-SUPPORT R. LEWIS	10,000.00

Expenditures \$100 or less not itemized above \$ 0.00

Amount or Value	Total this report
	\$ 10,000.00
*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.
	\$ 78,148.08

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Rebecca Lewis,	COUNTY COUNCIL MEMBER/WHATCOM CO	NON PARTISAN	☒ ☐	\$ 10,000.00	\$ 0.00
			☐ ☐	\$	\$
			☐ ☐	\$	\$
			☐ ☐	\$	\$

Filer Name:**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet ☐	Amount from attached pages	\$ 0.00
		TOTAL FUNDS RECEIVED	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature
	Printed Name SEAN PENDER
	Street address 1402 3RD AVE #1400
	City/State/Zip SEATTLE WA 98101
	Date Signed 10/18/21
	Place Signed (city and county) SEATTLE KING
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	