

Tanya Mercier replied  
Wed, 26 Oct 2022 at 3:46 PM  
To:vickie\_raines@hotmail.com

Hello Ms. Raines,

The Public Disclosure Commission received a complaint from Robert Parker on October 19, 2022, which has been assigned PDC Case Number 113544. The Complaint alleges the following: possible violation of RCW 42.17A.235 and .240 for failure to timely and accurately file campaign and expense reports.

Please review the attached complaint and respond to the questions below by **Wednesday, November 2, 2022**.

Coverage: 09/01/2022 to 10/17/2022  
Final report: No  
Report number: 110114165 Amends 110111260  
Election year: 2022  
Date submitted: 09/20/2022

**Schedule B: In Kind Contributions, Pledges, Orders, Debts, Obligations**

**1. IN KIND CONTRIBUTIONS RECEIVED:**

| Date Received | Contributor                                         | Employer/Occupation | Description                    | Amount                                                                 |
|---------------|-----------------------------------------------------|---------------------|--------------------------------|------------------------------------------------------------------------|
| 09/01/2022    | VICKIE L. RAINES<br>PO Box 928 Cosmopolis, WA 98537 |                     | Stripe test                    | Fair market value: \$10.00<br>Aggregate total (Primary): \$2,604.15    |
| 09/01/2022    | VICKIE L. RAINES<br>PO Box 928 Cosmopolis, WA 98537 |                     | Website design and maintenance | Fair market value: \$1,400.00<br>Aggregate total (General): \$1,725.00 |
| 09/06/2022    | VICKIE L. RAINES<br>PO Box 928 Cosmopolis, WA 98537 |                     | Campaign Ads                   | Fair market value: \$388.00<br>Aggregate total (Primary): \$2,604.15   |
| 09/06/2022    | VICKIE L. RAINES<br>PO Box 928 Cosmopolis, WA 98537 |                     | Campaign Ads                   | Fair market value: \$330.00<br>Aggregate total (Primary): \$2,604.15   |

1. Using the screen shot above, from the C4 report #110114165, you have reported yourself as the contributor of the in-kind contributions. Are you the person who provided the in-kind service and are donating the fair market value of that service **or** are you the person who paid for the service and are donating that payment for service to your campaign?
2. In either scenario outlined in #1, is there an expectation of repayment by your campaign?
3. Using the same example, please explain how you determine fair market value. For more information about fair market valuation, see WAC 390-05-235 and WAC 390-16-207.
4. We have provided guidance, on our [website](#), about what must be reported for an in-kind contribution. The information provided, using the example above, is scant on details. As well, using report # 110114130, the description of your Expenditures and Corrections is also lacking. What is the reason you have not provided all the necessary information in your reporting?
5. Specifically for C4 report #110114165, you've indicated in-kind contributions for "Campaign Ads." These types of expenditures require additional detail in the reporting, see our [webpage](#). As your response, please provide us the necessary reporting details for a media buy as it pertains to the two in-kind donations you have reported for "Campaign Ads."
6. You were previously a mini-filer but were granted approval for full reporting and previously worked with one of our Filer Assistance staff to get your C3 and C4 reports caught up. When did you work with Filer Assistance and for what time period did you need to retroactively submit C3 and C4 reports?
7. We appreciate that you are filing the C3 and C4 reports but there are requirements for timely reporting and it does not look like any of your reports have been filed in the applicable time frame outlined on our [Key Dates 2022 webpage](#). Please explain why the reports are not being filed as required.
8. You have reported paying for supplies to make signs. Have campaign signs been made and distributed for your campaign?

If you determine there is a need to file or amend reports as part of this case, you may review our guides and instructions at the website (<https://www.pdc.wa.gov/registration-reporting>).

If further assistance filing or amending reports beyond the guides and videos is needed, please reply to this message with a request to be assigned a Filer Assistance Specialist so that you receive timely and coordinated guidance.

For more information about the enforcement process, please see our [Enforcement Guide](#).

If you have any questions, please reply to this email.

Thank you,

Tanya Mercier  
Compliance Officer  
Public Disclosure Commission

[pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

1.360.586.4746

**\*\*Please use Reply when responding to this email**

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

Washington Public Disclosure Commission

<http://www.pdc.wa.gov>

Office Phone Number: 1.360.753.1111

Tanya Mercier replied

*Fri, 28 Oct 2022 at 4:35 PM*

To: vickie\_raines@hotmail.com

Cc: taxdr55@gmail.com

Hello Vickie,

To recap our call today, we discussed the level of detail needed on the C4 report in relation to the "Description" field for In-Kind Contributions and the "Purpose of Expense and/or Description" field for Expenditures. The more details you can provide the better so the public can see what good or service has been purchased or donated. You can get more guidance on specifically what should be included by visiting our webpages for [in-kind contributions](#), [WAC390-16-207](#), [media buys](#), [WAC390-16-037](#). As well, for your C3 reports, be sure to report the Employer and Address for contributors who make a contribution of more than \$100.

We also discussed the deadlines for reporting your C3 and C4. You have indicated you were approved by the PDC to go from Mini Filer to Full Filer status on 9/28/2022 and at that time your reporting was up to date. Since that date your C3 and C4 reports have not been filed on time per the reporting requirements for being within 21-days of the election. Please see [Key Dates: 2022](#) to ensure moving forward your reports are filed timely. If you need assistance with your reporting, please reach back out to Colin Peebles and he can provide you assistance to get your presently reported documents amended.

You've already provided a response to questions #3 & #5 but we discussed what more could be included in the response and you will revise your response in the coming days. And even though we discussed questions #4 & #7, do be sure to respond in writing to those questions too. Please provide your revisions by close of business on Tuesday 11/01/2022. I will review your responses altogether and get back to you with next steps.

If your Treasurer would like to start revising your C4 reports, with the necessary details for Expenditures and In-Kind Contributions, this would be a timely effort to remedy some of the issues identified in the complaint.

Regards,

Tanya

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To respond, please reply to this email.

Washington Public Disclosure Commission

<http://www.pdc.wa.gov>

1.360.753.1111

Vickie Raines replied

*Tue, 1 Nov 2022 at 4:36 PM*

To: "PDC Support" <pdcc@pdcc.wa.gov>

Cc: taxdr55@gmail.com

External Email

Hi Tanya,

The following are my responses to your questions below and related to your screenshot provided below:

1. As the Candidate, I personally paid for the services referenced in the screenshot above and consider such payments as in-kind contributions to my campaign.
2. No repayment of any in-kind contribution is desired or expected.
3. Payments to Robert Barclay for Web Design & Maintenance, as well as expenses for Treasurer duties are Fair Market Value. My Treasurer was paid her usual and customary fee for services. The web master was paid \$350 for start up and design, with a flat \$200/mo. during the election cycle for general duties, (updating the site, process contributions made through Stripe, updating endorsements and general trouble-shooting).
4. Upon review of the reports outlined, additional information regarding the media ads (radio platform in this case), have been updated with greater detail, including the order confirmation from both broadcasting entities with dates, station, times, and cost. Respective ORCA reports have been amended as well.
5. As the Candidate, I purchased radio ads from two different stations, Alpha Media and Jodesha Broadcasting. As outlined in my campaign finances, I paid these costs via telephone with my personal credit card. As previously explained to the PDC Staffer, these campaign purchases are considered in-kind contributions, with no repayment expected.
6. My campaign was approved for full-reporting on 9/28/2022. I worked with Filer Assistance Staff Colin Peebles for about 5-6 weeks and multiple amendments were amended or resubmitted, including the drop-down selection of my filing fee, from "in-kind contribution" to "filing fee".
7. Upon speaking with the Campaign Treasurer, the requirement for C3 & C4 reporting was inadvertently overlooked. Once the Treasurer was made aware of the issue, reports were promptly submitted and the issue remedied.
8. The purchase in question and mentioned in the complaint for stakes, sign material/hardware was for campaign signs that were purchased during the 2014 election cycle and re-used. My 2014 election filings with the PDC should show these purchases of the original signs.

Jodesha Broadcasting  
P.O. Box 1198  
Aberdeen, WA 98520  
360-533-3000  
Aberdeen, WA 98520

VICKIE RAINES

## TIMBER Order Confirmation

OrderID: 1215-002

Sponsor: Vickie Raines  
Product: Vickie Raines  
Estimate/PO:  
AccountRep: Gabrielle Jordan  
BillingCycle: Calendar Month  
InvoiceType: Times/Rates  
Run Dates: 8/18/2022 - 11/8/2022  
Items Ordered: 141  
Ordered Amount: \$1,692.00  
+None \$0.00  
Total Amount: \$1,692.00

### Scheduled Station(s): TMBR-FM Non-Pre Emptible

Printed 9/29/2022 8:52:15 AM

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| Run Dates                 | Run Weeks | Run Times           | Mon | Tue | We | Thu | Fri | Sat | Sun | Week<br>Total | Length | Descripti | Avail<br>Type | Copy ID | Qty | Item<br>Cost | Total Cost |
|---------------------------|-----------|---------------------|-----|-----|----|-----|-----|-----|-----|---------------|--------|-----------|---------------|---------|-----|--------------|------------|
| 01 8/18/2022 - 8/31/2022  | All Weeks | 06:00 AM - 10:00 AM | 3   | 3   | 3  | 3   | 3   |     |     | 15            | :30    | THANK Y   | VR01          |         | 30  | 12.00        | 360.00     |
| 03 9/25/2022 - 9/30/2022  | All Weeks | 06:00 AM - 10:00 AM | 6   | 6   | 6  | 6   | 6   |     |     | 30            | :30    | TESTIMO   | R1215-001     |         | 30  | 12.00        | 360.00     |
| 04 10/3/2022 - 10/14/2022 | All Weeks | 06:00 AM - 10:00 AM | 3   | 3   | 3  | 3   | 3   |     |     | 15            | :30    | TESTIMO   | R1215-001     |         | 30  | 12.00        | 360.00     |
| 05 10/17/2022 - 11/8/2022 | All Weeks | 06:00 AM - 10:00 AM | 3   | 3   | 3  | 3   | 3   |     |     | 15            | :30    | BALLOTS   | R1215-001     |         | 51  | 12.00        | 612.00     |

#### Calendar Month Projected Billing:

|        |        |        |        |        |        |         |        |
|--------|--------|--------|--------|--------|--------|---------|--------|
| Jul-22 | 0.00   | Aug-22 | 360.00 | Sep-22 | 360.00 | Q3-2022 | 720.00 |
| Oct-22 | 756.00 | Nov-22 | 216.00 | Dec-22 | 0.00   | Q4-2022 | 972.00 |

Confirmed Correct; Payment Guaranteed

Accepted for TIMBER

# Sales Order

Station: **KXRO-AM** Buyer: \_\_\_\_\_  
 Contract Name: **VOTE VICKIE RAINES-02** Tax Schedule: \_\_\_\_\_ (None)  
 Contract#: **41339751** Agency Commission %: **0**  
 Start Date: **8/18/22** End Date: **11/08/22** Billing Cycle: **Calendar**  
 Revenue Type: **Political Direct** Type: **Cash** Salesperson: **1509dros** Comm %: **0**  
 Advertiser: **VICKI RAINES FOR COMMISSIONER** Makegood Policy: **Within Contract Dates**  
 Address: **PO Box 1181**  
 City: **Elma** State: **WA**  
 Zip: **98541**  
 Product Name: **Campaign ads**  
 Competitive Code: **POLITICAL**

| No | DATES                             |          | Air<br>wks | TIMES   |          | LEN | DISTRIBUTION |   |   |   |   |    |    |        |     |       |       |    |        |   | RATE | TOTALS |  | PTY |
|----|-----------------------------------|----------|------------|---------|----------|-----|--------------|---|---|---|---|----|----|--------|-----|-------|-------|----|--------|---|------|--------|--|-----|
|    | START                             | END      |            | START   | END      |     | M            | T | W | T | F | SA | SU | Per Wk | D/W | SPOTS | \$    |    |        |   |      |        |  |     |
| 1  | 8/18/22                           | 8/21/22  |            | 6:00 AM | 10:00 AM | 30  | 3            | 3 | 3 | 3 | 3 |    |    |        |     |       | 11.00 | 30 | 330.00 | 3 |      |        |  |     |
|    | Thank you message                 |          |            |         |          |     |              |   |   |   |   |    |    |        |     |       |       |    |        |   |      |        |  |     |
| 2  | 9/19/22                           | 9/19/22  |            | 6:00 AM | 10:00 AM | 30  | 3            |   |   |   |   |    |    | 3      | D   |       | 11.00 | 0  | 0.00   | 3 |      |        |  |     |
|    | ----- CANCELED -----              |          |            |         |          |     |              |   |   |   |   |    |    |        |     |       |       |    |        |   |      |        |  |     |
| 3  | 10/17/22                          | 11/08/22 |            | 6:00 AM | 10:00 AM | 30  | 3            | 3 | 3 | 3 | 3 |    |    | 15     | D   |       | 11.00 | 51 | 561.00 | 3 |      |        |  |     |
|    | Ballots drop through Election Day |          |            |         |          |     |              |   |   |   |   |    |    |        |     |       |       |    |        |   |      |        |  |     |
| 4  | 9/26/22                           | 9/30/22  |            | 6:00 AM | 10:00 AM | 30  | 6            | 6 | 6 | 6 | 6 |    |    | 30     | D   |       | 11.00 | 30 | 330.00 | 3 |      |        |  |     |
|    | Testimonial ads                   |          |            |         |          |     |              |   |   |   |   |    |    |        |     |       |       |    |        |   |      |        |  |     |
| 5  | 10/03/22                          | 10/14/22 |            | 6:00 AM | 10:00 AM | 30  | 3            | 3 | 3 | 3 | 3 |    |    | 15     | D   |       | 11.00 | 30 | 330.00 | 3 |      |        |  |     |

## Billing Projections: By Month

|    | Aug 22 | Sep 22 | Oct 22 | Nov 22 |
|----|--------|--------|--------|--------|
| CA | 330.00 | 330.00 | 693.00 | 198.00 |
| ST | 231.00 | 99.00  | 990.00 | 231.00 |

☒ Print Spot Prices

Notes to Traffic: **WARNING!** This order has one or more  
 schedule lines canceled which has already aired.  
 Any spots which are aired, posted or invoiced must be  
 reconciled manually. Spots in the future will be removed  
 automatically when contract revision is scheduled in traffic.

TOTAL SPOTS **141**  
 GROSS TOTAL \$ **1,551.00**  
 ADJUSTED SPOTS **141**  
 ADJUSTED TOTAL \$ **1,551.00**

## APPROVE DECLINE

☒ ☐ 1509dros, 09/23/22 @11:49AM  
☒ ☐ 1509cfis, 09/23/22 @9:24PM  
☐ ☐ Sales Manager  
☐ ☐ National Sales Manager

Please let me know if you have questions, concerns or need clarification. Thank you so much for your assistance, I greatly appreciate it!

Vickie Raines  
 (360) 590-4100

