

[Zzappone](#)

replied

Sun, 21 May 2023 at 9:57 PM

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

External Email

Hello Tanya,

Regarding Case #136636, here are my responses to your questions:

I briefly reviewed the city council campaign and did not find C3 reports with corresponding dollar amounts reported on C4s transferred from the legislative campaign. Were C3s submitted? If not, explain why not and identify a date when the this issue be remedied?

I recorded the contributions approved by contributors to the 2020 campaign to be transferred to the 2021 campaign as carryover funds. The PDC Filer Assistance Specialist has recommended that I wait until the PDC has implemented the new rules to be decided upon at its May 25 meeting and will advise me how to record these contributions. After I receive these instructions, I should be able to make the necessary changes within 10 business days.

Explain the discrepancy between the total amount reported of \$6960 on C4s #10013514 and #110019711 for your legislative campaign and the total amount reported of \$7860 on C4 #110015923 for your city council campaign.

The February 2021 C4 for the 2020 campaign reports surplus funds of \$6,115 transferred on Feb 10, 2021 and \$745 transferred on February 28, 2021, a total of \$6,860. The April 2021 C4 reports \$1,000 transferred on April 3, 2021. These transfers total \$7,860, the total shown on the C4 for the city council campaign.

What was the total dollar amount transferred between the legislative campaign and the city council campaign?

\$7,860.

Did you obtain prior written authorization from contributors of your legislative campaign to transfer funds to your city council campaign? Please provide documentation that supports the approved authorizations corresponding to the amount transferred between the two campaigns.

Yes, Mr. Zappone obtained email authorizations from contributors to the legislative campaign to transfer funds to his city council campaign. I've attached his spreadsheet detailing these approvals. Mr. Zappone also has retained the emails to support the spreadsheet.

Responses to Mr. Morgan's allegations:

Failure to timely file Financial Disclosure documents

The PDC has indicated that Mr. Zappone did file an F-1 report for the required period of 2019-2020 and has dismissed this allegation specific to that violation.

Failure to accurately report income/contribution data with the PDC

I recorded the contributions approved by contributors to the 2020 campaign to be transferred to the 2021 campaign as carryover funds, although they occurred in February and April 2023, because I could not locate any more specific guidance on how to record these transfers. The PDC Filer Assistance Specialist has recommended that I wait until the PDC has implemented the new rules to

be decided upon at its May 25 meeting (which should be clearer than previously) and will advise me how to record these contributions. After I receive these instructions, I will make the necessary changes and file amendments as needed.

The February 2021 C4 for the 2020 campaign reports surplus funds of \$6,115 transferred on Feb 10, 2021 and \$745 transferred on February 28, 2021, a total of \$6,860. The April 2021 C4 reports \$1,000 transferred on April 3, 2021. These transfers total \$7,860, the total shown on the C4 for the city council campaign.

Illegal contribution from one candidate political campaign to another political campaign

The February 2021 C4 for the 2020 campaign reports surplus funds of \$6,115 transferred on Feb 10, 2021 and \$745 transferred on February 28, 2021, a total of \$6,860. The April 2021 C4 reports \$1,000 transferred on April 3, 2021. These transfers total \$7,860, the total shown on the C4 for the city council campaign.

Yes, Mr. Zappone obtained email authorizations from contributors to the legislative campaign to transfer these funds to his city council campaign. Attached his spreadsheet detailing these approvals. Mr. Zappone also has retained the emails to support the spreadsheet. A PDF of each email can be provided if needed.

Failure to get written approval by donors to transfer funds for a different office

See above response.

Also, bank balances were reconciled to ORCA regularly and the ending balances agree to ORCA.

Please let us know if you need more information.

Andrew Taylor, treasurer
Zack Zappone

No Phone #	Contact Date	Action	Email Sent	CONFIRMED PERMISSION	DATE_	NAME	STREET	CITY	STATE	ZIP	DATE_	AMOUNT	CONTRIBUTION_ TYPE	ELECTION
	20-Jan	talked Jack	21-Jan	23-Jan	10/27/2020	6TH LEGISLATIVE DISTRICT DEMOCRAT COMMITTEE	PO Box 4561	Spokane	WA	99220	10/27/2020	\$570.00	Monetary Contribution	GENERAL
	17-Jan	told Ty		4-Apr	10/22/2020	ARTHUR ROCK	415 Mission Street, Suite 5700	San Francisco	CA	94105	10/22/2020	\$1,000.00	Monetary Contribution	GENERAL
	25-Jan	VM	25-Jan	26-Jan	11/2/2020	ASHWIN WARRIOR	88 College Road West #424	Princeton	NJ	8540	11/2/2020	\$20.00	Monetary Contribution	GENERAL
	19-Jan	email	19-Jan	19-Jan	11/4/2020	BOB SWANSON	10051 45th Ave NE	Seattle	WA	98125	11/4/2020	\$20.00	Monetary Contribution	GENERAL
	25-Jan	VM	1/25 * 2/16	22-Feb	11/2/2020	CLAIRE AREND	7618 Toulte Ct	Pasco	WA	99301-6875	11/2/2020	\$20.00	Monetary Contribution	GENERAL
EMAIL	25-Jan	emailed	1/25 * 2/16	17-Feb	11/2/2020	CLAIRE MURPHY	1823 W Cannon Place Ln	Spokane	WA	99204	11/2/2020	\$100.00	Monetary Contribution	GENERAL
	25-Jan	talked	25-Jan	26-Jan	10/19/2020	DOROTHY WELLSANDT	8027 S Blackberry St	Cheney	WA	99004	10/19/2020	\$40.00	Monetary Contribution	GENERAL
	16-Feb	VM	16-Feb	16-Feb	10/28/2020	FITZ LUFKIN	726 Gresham Place NW	Washington	DC	20001	10/28/2020	\$25.00	Monetary Contribution	GENERAL
	19-Jan	VM	25-Jan	26-Jan	11/3/2020	FREDERICK LUKENS	7009 N Sutherland	Spokane	WA	99208	11/3/2020	\$25.00	Monetary Contribution	GENERAL
	25-Jan	VM	25-Jan	31-Jan	11/2/2020	GENE BALL	4046 Hawthorne Avenue, Apt 8	Dallas	TX	75219	11/2/2020	\$20.00	Monetary Contribution	GENERAL
	13-Nov	email	13-Jan	14-Jan	11/2/2020	GRAHAM SIMPSON	1 Lawrence Drive, Apartment	Princeton	NJ	8540	11/2/2020	\$30.00	Monetary Contribution	GENERAL
	13-Jan	emailed	13-Jan	14-Jan	10/22/2020	GRAHAM SIMPSON	1 Lawrence Drive, Apartment	Princeton	NJ	8540	10/22/2020	\$25.00	Monetary Contribution	GENERAL
	28-Jan	VM	16-Feb	17-Feb	10/20/2020	H F ANDERSEN (FRANK)	5114 23rd Ave W	Everett	WA	98203	10/20/2020	\$100.00	Monetary Contribution	GENERAL
	19-Jan	emailed	19-Jan	19-Jan	11/4/2020	HEATHER REGEN	2331 Prosser Ave	Los Angeles	CA	90064	11/4/2020	\$25.00	Monetary Contribution	GENERAL
	16-Feb	yes - potential early Christine is working on to board	16-Feb	16-Feb	10/19/2020	IAFF LOCAL 2916	PO Box 18336	Spokane	WA	0336	10/19/2020	\$250.00	Monetary Contribution	GENERAL
	28-Jan	on to board	9-Feb	9-Feb	10/19/2020	IBEW 77 PAC	19415 International Blvd	SeaTac	WA	98188	10/19/2020	\$500.00	Monetary Contribution	GENERAL
	28-Jan	it	5-Feb	9-Feb	10/27/2020	IBEW PAC EDUCATIONAL FUND	900 Seventh Street, NW	Washington	DC	20001	10/27/2020	\$500.00	Monetary Contribution	GENERAL
	25-Jan	VM	25-Jan	26-Jan	11/2/2020	ILEANA CRUZ	133 Water St 6A	Brooklyn	NY	11201	11/2/2020	\$50.00	Monetary Contribution	GENERAL
	20-Jan	called	21-Jan	29-Jan	10/19/2020	INTERNATIONAL LONGSHORE & WAREHOUSE UNION WASHINGTON AREA	3440 E Marginal Way S	Seattle	WA	98134-1132	10/19/2020	\$500.00	Monetary Contribution	GENERAL
	1-Feb	talked - going to ask higher ups	9-Feb	9-Feb	10/20/2020	IRON WORKERS DISTRICT COUNCIL OF THE PNW	110 Main Street, Suite 100	Edmonds	WA	98020	10/20/2020	\$1,000.00	Monetary Contribution	GENERAL
	21-Jan	talked	22-Jan	23-Jan	10/29/2020	JACK DONAHUE	1025 West 28th Avenue	Spokane	WA	99203	10/29/2020	\$100.00	Monetary Contribution	GENERAL
EMAIL	28-Jan	emailed	28-Jan	29-Jan	10/19/2020	JAMES & ALANNA CROUCH	2020 E Forest Ln.	Colbert	WA	99005-9340	10/19/2020	\$15.00	Monetary Contribution	PRIMARY
	19-Jan	yes	1/19 * 2/16* 3/1	1-Mar	11/4/2020	JEFF SEVELA	1818 W Francis Ave #177	Spokane	PA	99205	11/3/2020	\$20.00	Monetary Contribution	GENERAL
	19-Jan	yes	19-Jan	19-Jan	11/4/2020	JEREMAH PAPAARAZZO	2614 East Joseph Ave	Spokane	WA	99208	11/4/2020	\$10.00	Monetary Contribution	GENERAL
	14-Jan	email	14-Jan	14-Jan	11/2/2020	JESSIE DURRETT	507 Redbud Way	Nevada City	NV	95959	11/2/2020	\$20.00	Monetary Contribution	GENERAL
EMAIL	28-Jan	emailed	28-Jan	29-Jan	10/19/2020	JIM & ALANNA CROUCH	2020 E Forest Ln.	Colbert	WA	99005-9340	10/19/2020	\$15.00	Monetary Contribution	GENERAL
	20-Jan	emailed	20-Jan	2/9 & 3/7	10/19/2020	JOAN SUMNER	PO Box 1723	Airway Heights	WA	99001	10/19/2020	\$20.00	Monetary Contribution	GENERAL
EMAIL	26-Jan	emailed	26-Jan	27-Jan	10/19/2020	JOEL PERKINS	2503 W Decatur Ave	Spokane	WA	99205	10/19/2020	\$20.00	Monetary Contribution	GENERAL
EMAIL	25-Jan	emailed	1/25 * 2/16	17-Feb	11/2/2020	JOHN CARTER	10413 N. Jacqueline Ln.	None Mile Falls	WA	99026	11/2/2020	\$50.00	Monetary Contribution	GENERAL
EMAIL	25-Jan	emailed	1/25 * 2/16	17-Feb	10/19/2020	JOHN CARTER	10413 N. Jacqueline Ln.	None Mile Falls	WA	99026	10/19/2020	\$50.00	Monetary Contribution	GENERAL
	25-Jan	called	25-Jan	26-Jan	11/2/2020	KAREN CARLBERG	927 S Azalea Dr	Spokane	WA	99224	11/2/2020	\$20.00	Monetary Contribution	GENERAL
	28-Jan	called	1/28 * 2/16	2/9 & 2/24	10/26/2020	KEVIN GILMORE	1325 N Sherwood St	Spokane	WA	99201	10/26/2020	\$50.00	Monetary Contribution	GENERAL
EMAIL/ BHT	25-Jan	emailed	25-Jan	26-Jan	11/2/2020	LAREESA HOLFORD	6718 N Howard	Spokane	WA	99208	11/2/2020	\$20.00	Monetary Contribution	GENERAL
	1/19 & 1/28	MEETING 2/3	3-Feb	4-Feb	11/4/2020	LAURA ACKERMAN	3118 S Windsor Rd	Spokane	WA	99224-5043	11/4/2020	\$25.00	Monetary Contribution	GENERAL
	25-Jan	VM	25-Jan	30-Jan	11/2/2020	LUNDA SWENIG	6921 N Crestline St	Spokane	WA	99217	11/2/2020	\$50.00	Monetary Contribution	GENERAL
	26-Jan	called	26-Jan	26-Jan	10/28/2020	MARILYN DARLICK	1814 W Briardrift Lane	Spokane	WA	99201	10/28/2020	\$20.00	Monetary Contribution	GENERAL
	19-Jan	yes	19-Jan	20-Jan	11/3/2020	MARK HAND	4324 E23rd Lane	Spokane	WA	99223	11/3/2020	\$25.00	Monetary Contribution	GENERAL
	19-Jan	email	19-Jan	24-Jan	11/2/2020	MARTY ROBINETTE	8028 N Stephanie Street	Spokane	WA	99208	11/2/2020	\$25.00	Monetary Contribution	GENERAL
	19-Jan	VM - send	19-Jan	20-Jan	11/3/2020	MICHAEL DELEY	PO Box 1753	Medical Lake	WA	99022	11/3/2020	\$10.00	Monetary Contribution	GENERAL
	19-Jan	messaged	16-Feb	9-Feb	11/2/2020	MOLLY LUKENS	1424 W. Gordon	Spokane	WA	99205	11/2/2020	\$20.00	Monetary Contribution	GENERAL
	19-Jan	call & emailed	19-Jan	19-Jan	11/17/2020	NATHAN JEFFRIES	PO Box 453	Mead	WA	99021	11/17/2020	\$50.00	Monetary Contribution	GENERAL
	25-Jan	VM	1/25 * 2/16	17-Feb	11/2/2020	NICOLE BOND	10012 North Larchwood Street	Spokane	WA	99208	11/2/2020	\$25.00	Monetary Contribution	GENERAL
	14-Jan	email	14-Jan	1-Feb	11/5/2020	PAMELA SMITH	17465 N Meadowview Ln	Nine Mile Falls	WA	99026	11/5/2020	\$30.00	Monetary Contribution	GENERAL
EMAIL	25-Jan	emailed	25-Jan	26-Jan	11/21/2020	PEOPLE FOR DEREK KILMER	PO Box 1381	Tacoma	WA	98402	11/21/2020	\$500.00	Monetary Contribution	GENERAL
	3-Feb	talked dynamics - yea	4-Feb	5-Feb	11/2/2020	PLANNED PARENTHOOD ADVOCATES OF GREATER WASHINGTON PAC	123 E. Indiana Ave.	Spokane	WA	99207	11/2/2020	\$500.00	Monetary Contribution	GENERAL
	26-Jan	VM	25-Jan	1-Feb	11/2/2020	REBECCA MACMULLAN	2510 E 40th Ave	Spokane	WA	99223	11/2/2020	\$15.00	Monetary Contribution	GENERAL
	22-Jan	VM	25-Jan	26-Jan	11/2/2020	RHONDA GALVIN	12702 Powder Ct	Airway Heights	WA	99001	11/2/2020	\$100.00	Monetary Contribution	GENERAL
	3-Nov	emailed	13-Jan	14-Jan	11/2/2020	ROCIO LABRADOR	1 Lawrence Drive Apt. 407	Princeton	WA	8540	11/2/2020	\$20.00	Monetary Contribution	GENERAL
LETTER	30-Jan	mailed	NA	9-Feb	10/29/2020	RON FOREST	86 Packer Creek Rd	Saltese	MT	59867	10/29/2020	\$100.00	Monetary Contribution	GENERAL
	26-Jan	VM	16-Feb	ruslambeth@gmail.com	11/2/2020	RUSSELL LAMBETH	815 W Bellwood Dr Apt 4	Spokane	WA	99218	11/2/2020	\$50.00	Monetary Contribution	GENERAL
	28-Jan	called	28-Jan	28-Jan	10/21/2020	SEAN JAFFE	2904 Montlake Boulevard East	Seattle	WA	98112	10/21/2020	\$100.00	Monetary Contribution	GENERAL
	28-Jan	VM	9-Feb	9-Feb	10/23/2020	SERVICE EMPLOYEES INTERNATIONAL UNION	3720 Airport Way South Ste. 340	Seattle	WA	98134	10/23/2020	\$300.00	Monetary Contribution	GENERAL
	1/19 & 1/28	called - yes	28-Jan	29-Jan	11/9/2020	SMART TO PAC	24950 Country Club Blvd., Ste. 340	North Olmsted	OH	44070-5333	11/9/2020	\$250.00	Monetary Contribution	GENERAL
	1/25 & 2/16	VM	25-Feb	25-Feb	11/2/2020	SPOKANE COUNTY FIRE DISTRICT 8 LOCAL 3741	PO Box 30601	Spokane	WA	99223-3010	11/2/2020	\$100.00	Monetary Contribution	GENERAL
	28-Jan	CANNOT FORWARD	NO		10/27/2020	SPOKANE REGIONAL LABOR COUNCIL SSF	510 Elm St, Suite 1	Spokane	WA	99201-5621	10/27/2020	\$500.00	Monetary Contribution	GENERAL
	28-Jan	called	28-Jan	6-Feb	10/27/2020	STEVEN BAUCK	1636 N 53rd	Seattle	WA	98103	10/27/2020	\$50.00	Monetary Contribution	GENERAL
	19-Jan	emailed	19-Jan	20-Jan	11/2/2020	SU SAWYER	1918 S Audubon	Spokane	WA	99224	11/2/2020	\$20.00	Monetary Contribution	GENERAL
	19-Jan	email	19-Jan	23-Jan	11/3/2020	TERRY PERKINS	62751 Highway 291	Nine Miles Falls	WA	99026	11/3/2020	\$50.00	Monetary Contribution	GENERAL
	19-Jan	VM - send	1/19 * 2/16	16-Feb	11/3/2020	THOMAS HEAVEY	8208 N Whitehouse Dr	Spokane	WA	99208	11/3/2020	\$25.00	Monetary Contribution	GENERAL
EMAIL	28-Jan	emailed	28-Jan	5-Feb	11/2/2020	TRACY CARBONNEAU	7141 N Audubon Drive	Spokane	WA	99208	11/2/2020	\$20.00	Monetary Contribution	GENERAL
	28-Jan	emailed	28-Jan	5-Feb	10/20/2020	TRACY CARBONNEAU	7141 N Audubon Drive	Spokane	WA	99208	10/20/2020	\$20.00	Monetary Contribution	GENERAL
EMAIL	28-Jan	emailed	28-Jan	29-Jan	11/2/2020	TRACY DURBIN	2727 E 53rd Ave #G202	Spokane	WA	99223	11/2/2020	\$50.00	Monetary Contribution	GENERAL
EMAIL	25-Jan	email	25-Jan	26-Jan	11/3/2020	WELLS STROMBERG	280 E. Meadowlone Rd	Spokane	WA	99224	11/3/2020	\$150.00	Monetary Contribution	GENERAL
Less contributions not approved to be transferred												\$8,430.00		
	28-Jan	CANNOT FORWARD	NO		10/27/2020	SPOKANE REGIONAL LABOR COUNCIL SSF	510 Elm St, Suite 1	Spokane	WA	99201-5621	10/27/2020	(\$500.00)	Monetary Contribution	GENERAL
	26-Jan	VM	16-Feb	ruslambeth@gmail.com	11/2/2020	RUSSELL LAMBETH	815 W Bellwood Dr Apt 4	Spokane	WA	99218	11/2/2020	(\$50.00)	Monetary Contribution	GENERAL
Less approved amount that wasn't transferred												(\$20.00)		
Total transferred to city council campaign												\$7,860.00		