



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

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17A

Zack Zappone

Respondent.

PDC Case 136626

Report of Investigation

I. BACKGROUND

Pre-May 2023 PDC Guidance Regarding Surplus Funds

- 1.1 As relevant to this case, “surplus funds” are the balance of contributions that remain in the possession or control of a committee or candidate subsequent to the election for which the contributions were received, and that are in excess of the amount necessary to pay remaining debts or expenses incurred by the committee or candidate with respect to that election. When deciding which contributions make up the “surplus funds” balance, pre-May 2023 guidance was based on using a first-in, first-out accounting method, resulting in the last contributions received by the 2020 campaign being the first contributions eligible for transfer to the 2021 campaign.
- 1.2 Prior to May 11, 2023, PDC Staff had published guidance that instructed filers who transfer "surplus funds" from one campaign to another campaign to complete a C-3 report as the first filing for the new campaign and identify the surplus funds as a “Miscellaneous receipt, other receipt.”
- 1.3 The guidance described above is consistent with an August 28, 1995 Memorandum by Assistant Attorney General Roselyn Marcus, who at the time represented PDC Staff in enforcement matters. (**Exhibit 1**) The guidance stated, in relevant part:

Q: When surplus funds are transferred to a new campaign, are they subject to the contribution limits?

A: No, the surplus funds are transferred in one lump sum as surplus funds without attribution to original contributors. The scheme of Initiative 134 is to allow all contributors the ability to contribute up to a certain limit for the primary, general and special election. Once the contribution is counted against the contributor's limit for that election, it should not be counted against a subsequent limit for a new election. To do otherwise would be to double count one contribution.

- 1.4 On or about August 29, 1995, the Commission "reached a consensus to adopt Ms. Marcus' memo." This is reflected in Commission Meeting Minutes dated August 29, 1995. (**Exhibit 2**). However, the Commission did not reduce its adoption of Ms. Marcus' memo to a formal, written interpretation. However, PDC Staff published guidance in keeping with the memo.

PDC Interpretation No. 23-01, Adopted May 25, 2023

- 1.5 On May 11, 2023, the Commission voted to issue a formal interpretation on the use of surplus funds as contributions for a different office, and on May 25, 2023, the Commission officially adopted the interpretation. (**Exhibit 3**) The interpretation states, in relevant part:

The Commission determines that the use of a candidate's surplus contributions for the same person's campaign for a different office are considered contributions to that new campaign. Specifically, when a candidate is transferring surplus contributions from a previously completed election campaign to a new campaign for a different office, those contributions moved to the new campaign must be attributed to their sources, and count toward the contributor's limit for the new campaign. Each contributor whose written approval was obtained must be identified along with their contribution.

Zack Zappone's 2020 Campaign for State Representative and 2021 Campaign for Spokane City Council

- 1.6 Zack Zappone is a member of the Spokane City Council, serving District 3, Position 2. He was elected in 2021 and assumed office on January 1, 2022. His current term ends on January 1, 2026. Mr. Zappone received 10,494 votes (50.53%) defeating Mike Lish who received 10,232 votes (49.27%).
- 1.7 In 2020, Zack Zappone ran for State Representative in Legislative District 6, Position 1. He received 41,153 votes (47.96%) losing to Mike Volz who received 44,537 votes (51.91%).
- 1.8 At the conclusion of Mr. Zappone's 2020 campaign, the campaign had surplus funds totaling \$8,411.77. Of that amount, Mr. Zappone transferred \$7,860 to his 2021 campaign for Spokane City Council after receiving written permission from contributors, applying PDC staff's last-in to the 2020 campaign is first-out to the 2021 campaign guidance.

II. ALLEGATIONS IN COMPLAINT

2.1 On May 4, 2023, Glen Morgan filed a complaint alleging that Zack Zappone's 2021 campaign for Spokane City Council committed the following violations of RCW 42.17A¹: **(Exhibit 4)**

1. RCW 42.17A.235 and .240 by failing to accurately report the receipt of contributions totaling \$7,860, at the start of Zack Zappone's 2021 City Council campaign.
2. RCW 42.17A.490 by failing to obtain written approval from donors to transfer their unused contributions, originally made to Mr. Zappone's State Representative campaign, to Mr. Zappone's 2021 City Council campaign.

2.2 Staff investigated these allegations, which concerned whether surplus funds remaining after the conclusion of Zack Zappone's 2020 State Representative campaign were properly transferred to and accounted for in Mr. Zappone's 2021 Spokane City Council campaign reports.

III. FINDINGS

Response from the Respondent, Zack Zappone

3.1 On May 21, 2023, PDC Staff received a response to the complaint from Mr. Zappone's treasurer, Andrew Taylor. The response included answers to questions about the complaint from PDC staff. **(Exhibit 5)**

3.2 Mr. Taylor addressed the allegations as follows:

- a. "The February 2021 C4 for the 2020 campaign reports surplus funds of \$6,115 transferred on February 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."
- b. "I recorded the contributions approved by contributors to the 2020 campaign to be transferred to the 2021 campaign as carryover funds."
- c. "Mr. Zappone obtained email authorizations from contributors to the legislative campaign to transfer funds to his city council campaign. Mr. Zappone also has retained the emails."

How surplus funds from the Respondent's 2020 state legislature campaign were reported by the Respondent's 2021 campaign for Spokane City Council

3.3 PDC staff confirmed the transfer amount of \$7,860 reported on C-4 reports as "lump sum" transfers out of the 2020 campaign and into the 2021 campaign. **(Exhibit 6 & 7)**

¹ Mr. Morgan's complaint included additional allegations that are being handled separately by PDC Staff.

- a. From the 2020 campaign there were three reported transfers of funds, totaling \$7,860, documented on C-4 report #110013514 and C-4 report #110019711.
- b. In the 2021 campaign, \$7,860 was reported as “carry forward” on the first C-4, #10019711, filed on February 10, 2021, and amended on April 12, 2021.

Whether the Respondent’s 2020 campaign sought and received permission from donors prior to transferring funds into the Respondent’s 2021 campaign

3.4 PDC staff reviewed a list of contributors to the 2020 campaign provided by the Respondent, and determined the Respondent followed PDC Staff’s pre-May 2023 guidance based on a first-in, first-out accounting method, resulting in the last contributions received by the 2020 campaign being the first contributions eligible for transfer to the 2021 campaign. Additionally, Respondent provided PDC Staff with evidence showing that he requested and received permission from 2020 campaign contributors to transfer funds received for the legislative campaign to the 2021 city council campaign.

The Legality of Respondent’s Transfer of Surplus Funds

3.5 The Respondent’s transfer of surplus funds is inconsistent with PDC Interpretation No. 23-01, which was formally adopted by the Commission on May 25, 2023 (**Exhibit 3**).

IV. SCOPE

4.1 PDC staff reviewed the complaint filed by Mr. Morgan, the response from Zack Zappone, reports filed by Mr. Zappone’s 2020 campaign for State Representative, reports filed by Mr. Zappone’s 2021 campaign for Spokane City Council, and other relevant material to determine whether a violation may have occurred.

V. LAW AND REGULATORY AUTHORITY

RCW 42.17A.235 and **.240** require candidates, single election issue political committees, and continuing political committees to file timely, accurate, complete reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Contributions are reported weekly during this same time period and must be disclosed on Monday for contributions deposited during the previous seven days. Contribution reports must include detailed information about each contributor giving more than \$25 in the aggregate during the campaign including the contributor’s name and address, the amount of the contribution, the aggregate of contributions made during the election campaign, and when the contributor is an individual and the contributor’s aggregate contributions exceed \$100, the occupation of the contributor and the name and location (city and state) of their employer.

RCW 42.17A.490 states:

(1) Except as provided in subsection (2) of this section, a candidate for public office or the candidate's authorized committee may not use or permit the use of contributions, whether or not surplus, solicited for or received by the candidate or the candidate's authorized committee to further the candidacy of the individual for an office other than the office designated on the statement of organization. A contribution solicited for or received on behalf of the candidate is considered solicited or received for the candidacy for which the individual is then a candidate if the contribution is solicited or received before the general election for which the candidate is a nominee or is unopposed.

(2) With the written approval of the contributor, a candidate or the candidate's authorized committee may use or permit the use of contributions, whether or not surplus, solicited for or received by the candidate or the candidate's authorized committee from that contributor to further the candidacy of the individual for an office other than the office designated on the statement of organization. If the contributor does not approve the use of his or her contribution to further the candidacy of the individual for an office other than the office designated on the statement of organization at the time of the contribution, the contribution must be considered surplus funds and disposed of in accordance with RCW [42.17A.430](#).

PDC Interpretation No. 23-01, Adopted May 25, 2023, states, in part:

The Commission determines that the use of a candidate's surplus contributions for the same person's campaign for a different office are considered contributions to that new campaign. Specifically, when a candidate is transferring surplus contributions from a previously completed election campaign to a new campaign for a different office, those contributions moved to the new campaign must be attributed to their sources, and count toward the contributor's limit for the new campaign. Each contributor whose written approval was obtained must be identified along with their contribution.

Respectfully submitted this 12th day of June 2023.

/S/ Electronically Signed

Tanya Mercier
Compliance Officer

EXHIBIT LIST

- | | |
|------------------|--|
| Exhibit 1 | 1995 AG Memo dated August 28, 1995 |
| Exhibit 2 | August 1995 PDC Commission Meeting Minutes dated August 29, 1995 |
| Exhibit 3 | Commission's Current Interpretation dated May 25, 2023 |
| Exhibit 4 | Complaint filed by Glen Morgan on May 4, 2023 |
| Exhibit 5 | Response to complaint filed by Zack Zappone on May 21, 2023 |

Exhibit 6 2020 C-4 Reports for State Representative Campaign's End Balance and Transfer of Surplus Funds

Exhibit 7 2021 C-4 Report for Start of Campaign for Spokane City Council



Christine O. Gregoire

ATTORNEY GENERAL OF WASHINGTON

905 Plum Street Bldg 3 • PO Box 40100 • Olympia WA 98504-0100

MEMORANDUM

August 28, 1995

TO: Members, Public Disclosure Commission

FROM: Roselyn Marcus, Assistant Attorney General

SUBJECT: Issues Relating to Surplus Funds

Because of the changes made to Chapter 42.17 RCW by **ESSB 5684**, several questions have arisen surrounding surplus funds. This memorandum seeks to answer these questions.

1. Question: Do surplus funds cease to be surplus when carried forward to a new campaign?

Answer: Yes, surplus funds cease to be surplus when carried forward to a new campaign. Surplus funds is defined in RCW 42.17.020(41) as the balance of contributions that remain in the possession or control of the candidate or political committee subsequent to the election for which the contributions were received, and that are in excess of the amount necessary to pay remaining debts incurred prior to that election. Therefore, after an election, once all debts are paid, the remaining balance is considered surplus. The disposal of surplus funds is governed by RCW 42.17.095. Surplus funds can be used in a future election campaign, RCW 42.17.790. Surplus funds deposited in the new campaign account is a "contribution" to the new campaign and must be reported on the new campaign's disclosure forms. As a contribution (or seed money) for the new campaign, the funds constitute active campaign funds which then must be reported and spent pursuant to RCW 42.17.040 - .135 and are no longer considered surplus.

2. Question: If surplus funds are not transferred to a new campaign, nor otherwise disposed of according to RCW 42.17.095, what can or should be done with the surplus?

Answer: If the surplus funds are not disposed of pursuant to RCW 42.17.095, then the funds should be left in the separate account. This account is subject to separate reporting of its activities. These funds should not be commingled with any other funds. The separation should be real, not just on paper.

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The funds could also be transferred to a new "surplus funds account", which would only include surplus funds. Once transferred to a "surplus funds account", these funds can only be disposed of pursuant to RCW 42.17.095(7).

3. Question: For winners in a primary election, when do primary surplus funds cease to be surplus?

Answer: If primary contributions are kept in the same account as general election contribution, then I support the following recommendation of staff:

Primary surplus funds at the time that, following the primary election, 1) the campaign deposits general election contributions into the same account as the primary surplus, or 2) the campaign makes general election expenditures from this same account (including orders placed), whichever comes first.

Prior to that date, the candidate may:

- a. transfer all or part of the primary surplus funds to a surplus funds account; or
- b. leave the primary surplus in the same account as the general contributions, thereby making them active general election campaign funds; or
- c. set up a separate general election campaign account and leave the primary surplus in the separate primary election campaign account, thereby limiting its use to that which is set forth in RCW 42.17.095.

If primary contributions have been kept in a separate account from any general election contributions from the start, then after the primary election, the winning candidate may follow option a or otherwise dispose of the funds pursuant to RCW 42.17.095.

4. Question: May a candidate use surplus funds from one election for a future election for a different office?

Answer: Yes, a candidate may use surplus funds from one election for a future election for a different office if the candidate has received written permission from the contributor. Confusion has arisen because of the amendment to RCW 42.17.790. The surplus funds statute states that surplus funds can be transferred to a new campaign if the new campaign is for the office last sought by the candidate. This section remains unchanged.

RCW 42.17.790 previously allowed only active campaign funds collected for an election to one office to be used for a different office upon the written consent of the contributors. This

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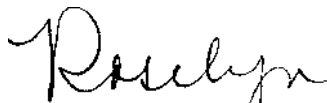
section has been amended to now allow both active and surplus campaign funds to be used for a future election campaign for a different office upon written consent of the contributors.

In reading these two statutes together, thereby giving both meaning, surplus funds can be used for a future election for the same office last sought without receiving any written permission from the contributors. However, if surplus is to be used for a new campaign for a different office than the one last sought, it can be done, but only upon the receipt of written permission from the contributors of the remaining funds.

5. Question: When surplus funds are transferred to a new campaign, are they subject to the contribution limits?

Answer: No, the surplus funds are transferred in one lump sum as surplus funds without attribution to original contributors. The scheme of Initiative 134 is to allow all contributors the ability to contribute up to a certain limit for the primary, general and special election. Once the contribution is counted against the contributor's limit for that election, it should not be counted against a subsequent limit for a new election. To do otherwise would be to double count one contribution.

I have attached RCW 42.17.095 and RCW 42.17.790, as amended by ESSB 5684, for ease of reference. I hope these answers are helpful to you in dealing with surplus funds. If you have any questions or wish to discuss this further, do not hesitate to ask.



ROSELYN MA'CUS
Assistant Attorney General
(360) 586-1913

:RM

15 **Sec. 31.** RCW 42.17.095 and 1993 c 2 s 20 are each amended to read
16 as follows:

17 The surplus funds of a candidate, or of a political committee
18 su^Pporting or opposing a candidate, may only be disposed of in any one
19 or more of the following ways:

20 **(1) Return the surplus to a contributor in an amount not to exceed**
21 that contributor's original contribution;

22 **(2) Transfer the surplus to the candidate's personal account as**
23 reimbursement for lost earnings incurred as a result of that
24 candidate's election campaign. Such lost earnings shall be verifiable
25 as unpaid salary or, when the candidate is not salaried, as an amount
26 not to exceed income received by the candidate for services rendered
27 during an appropriate, corresponding time period. All lost earnings
28 incurred shall be documented and a record thereof shall be maintained
29 by the candidate or. the candidate's political committee. The committee
30 shall include a copy of such record when its expenditure for such
31 reimbursement is reported pursuant to RCW 42.17.090;

32 **(3) Transfer the surplus without limit to a political party or to**
33 a caucus ((of the state ~~legislature~~)) political committee;

34 **(4) Donate the surplus to a charitable organization registered in**
35 accordance with chapter 19.09 RCW;

36 **(5) Transmit the surplus to the state treasurer for deposit in the**
37 general fund; or

(6) Hold the surplus in the campaign depository or depositories
2 designated in accordance with RCW 42.17.050 for-. ~~possible use in a~~
3 future. ~~election campaign~~ for the. ~~same office last sou~~ he
4 candidate and report any such disposition in accordance RCW
5 42.17.090: PROVIDED, That if the candidate subsequently ~~announces~~
6 publicly files for office, information as appropriate is reported
7 the commission in accordance with RCW 42.17.040 through ~~42.17.090~~. If
8 a subsequent office is not sought the surplus held shall be disposed. of
9 in accordance with the requirements of this section.

10 **(7) Hold the surplus campaign funds in a se^Parate account for**
11 **nonreimbursed public office-related ex^Penses or as provided in this**
12 **section. and re^Port any such dis^Position in accordance with'** RCW
13 **42.17.090. The separate account required under this subsection shall**
14 **not be used for deposits of campaign funds that are not surplus.**

15 **(8) No candidate or authorized committee may transfer funds to any**
16 **other candidate or other political committee.**

17 **The disposal of surplus funds under this section shall not be.**
18 **considered a contribution for purposes of this chapter.**

17 A person ((or cntity)) may not solicit from a candidate for public
18 office, Political committee, political party; or- other person ((or
19 cntity)) money or other property as a condition or consideration for an
20 endorsement, article, or- other communication in. the news
21 promoting or opposing a candidate for- public office, political
22 committee, or political party.

23 Sec. 26.. RCW 42.17.780 and 1993 2.s 18 are each amended to read
24 as follows:

25 A person ((or ~~entity~~)) may not, directly or indirectly, reimburse
26 another person ((or cntity)) for a contribution to a candidate for
27 public office, political committee, or political party.

28 Sec. 27'. RCW 42.17.790 and 1993 c 2-s 19 are each amended to-read
29 as follows:

30 . (1) Except as provided in subsection (2) of this section, a
31 candidate for public office or the candidate's political
32 not use or permit the use of contributions whether or not' surplus.
33 solicited for or received by the candidate for public office or .the.
34 candidate's political committee to further the candidacy of .the
35 individual for an office other than the office designated on. the
36 statement of organization. A contribution solicited for or received on

1 behalf of the candidate for public office is considered solicited or
2 received for the candidacy for which the individual is then a candidate
3 if the contribution is solicited or received before the general ,
4 elections for which the candidate for public office is a nominee or is
5 unopposed.

6 (2) With the written approval of the contributor, a candidate for
7 public office or the candidate's political committee may use or permit
8 the use of contributions, whether or not surplus. solicited for or
9 received by the candidate for public office or the candidate's
10 Political committee from that contributor to further the candidacy of
11 the individual for an office other than the office designated on the
12 statement of organization. If the contributor does not approve the use
13 of his or her contribution to further the candidacy of the individual
14 for an office other than the office desi^gnated on the statement of
15 organization at the time of the contribution, the contribution must be
16 considered surplus funds and disposed of in accordance with RCW
17 42.17.095.

18 Sec. 28. RCW 42.17.100 and 1989 c 280 s '10 are each amended to



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Amended

A G E N D A

Note: All times shown for consideration of agenda items (other than time of convening) are approximate and may vary, depending on the amount of discussion required for each.

Special Meeting
Tuesday, August 29, 1995

Location: Second Floor Conference Room
Evergreen Plaza Building
711 Capitol Way
Olympia, Washington

9:00 a.m. **Minutes**

Review and approval of the minutes of the regular meeting of July 25, 1995.

Citizen Comments/Concerns

Commissioner Comments/Concerns

9:05 a.m. **Advisory Matters**

1. Discussion of Shawn Newman's request for opinion regarding talk show hosts who are candidates for office
2. Government access--television

10:15 a.m. **Rules/Rulings/Interpretations**

1. Discussion of RCW 42.17.095--Disposal of candidate surplus funds
2. Possible adoption of emergency rules amending Lobbyist Monthly Expense Report (Form L-2) and L-2 Memo Report to conform with provisions of Chapter 397, 1995 Session Laws (ESSB 5684)

11:15 a.m. **Reporting Modifications**

New

1. **Richard Roozen**, candidate for Mt. Vernon School Board, requests to not report the business customers of Washington Bulb Company.

"The public's right to know of the financing of political campaigns and lobbying and the financial affairs of elected officials and candidates far outweighs any right that these matters remain secret and private."

RCW 42.17.010 (10)

Reporting Modifications (Continued)

New

2. **Gerald A. Smith**, candidate for Seattle School Board, requests to not report the finances of his former spouse.
3. **Randall Trettevik**, candidate for Everett School Board, requests to not report corporate holdings of Safecare, Inc., FNM Development, LLC, Maple Park Lutheran Church and Church of the Lutheran Brethren.
4. **Paul A. Bastine**, candidate, Spokane County Superior Court, requests to not report business customers of the law firm of Bastine, Carrol & Iverson, P.S.
5. **Mari M. Greves**, candidate, Vancouver School District, requests to not report business customers of the Vancouver Clinic of which her spouse is an employee and 2% partner.
6. **James L. Grove**, candidate, Skagit County Fire District 13, requests to not report business customers of Grove's City Electric Service, Inc.
7. **S. Gregory Lipton, Ph.D.**, candidate, Mercer Island City Council, requests to not identify his spouse's finances.

11:30 a.m.

Staff Reports

1. Executive Director's Report
 - a. Document Access and Management Project
 - b. Commission authorization for COGEL attendance
2. Assistant Director's Report
 - a. Compliance and Enforcement
 - b. Public Information and Policy Development
 - c. Records and Administration
3. Attorney General's Report

11:45 a.m.

Executive Session

Discuss pending litigation



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August 29, 1995
9:00 a.m.

MINUTES - SPECIAL MEETING

Second Floor Conference Room
Evergreen Plaza Building
711 Capitol Way
Olympia, Washington

COMMISSION MEMBERS PRESENT

Jim Whiteside, Chair
Gary Maehara, Secretary
Irene Heninger
Jocelyn Marchisio

STAFF PRESENT

Melissa Warheit, Executive Director
Karen Copeland, Assistant Director, Records & Administration
Susan Harris, Assistant Director, Compliance & Enforcement
Vicki Rippie, Assistant Dir., Public Info. & Policy Development
Roselyn Marcus, Assistant Attorney General
Chip Holcomb, Assistant Attorney General
Shelby Jorgensen, Secretary

COMMISSION MEMBERS ABSENT

Don Brazier, Vice Chair

The special meeting of the Public Disclosure Commission was called to order at 9:00 a.m. by Chair Jim Whiteside. He noted that all Commissioners were present except Mr. Brazier.

Minutes

Moved by Ms. Marchisio, seconded by Mr. Maehara:

MOTION 95-090

The Commission adopts the minutes of the regular meeting of July 25, 1995 as written.

The motion received unanimous approval.

Citizen Comments

There were no citizen comments or concerns at this time.

Commissioner
Comments/Concerns

There were no Commissioner comments at this time.

*"The public's right to know of the financing of political campaigns and lobbying
and the financial affairs of elected officials and candidates far outweighs
any right that these matters remain secret and private."*

RCW 42.17.010 (10)

Minutes
August 29, 1995

issue is much broader since there are many government access channels. She asked that the Commission give general guidelines for now and not issue a decision until more information is gathered.

Mr. Maehara suggested airing a periodic notice offering opposing views a chance to express their opinions. Ms. Marchisio and Ms. Heninger felt guidelines similar to those used for school districts would apply in this case.

The Commission agreed staff should develop guidelines.

Rules
Surplus Funds

Ms. Marcus reviewed her surplus funds memo to the Commission explaining changes to RCW 42.17 made by ESSB 5684.

The Commission reached a consensus to adopt Ms. Marcus' memo as an interpretation (copy attached).

Lobbyist Report Form
Changes

Ms. Rippie described changes to the Lobbyist Monthly Expense Report (L-2) and the L-2 Memo Report as a result of ESSB 5684. She asked the Commission to adopt emergency rules effective September 1, 1995, and advised that this issue will come before the Commission again to adopt permanent rules.

MOTION 95-092

Moved by Ms. Marchisio, seconded by Ms. Heninger:

The Commission adopts the amended L-2 and L-2 Memo Report forms on an emergency basis effective September 1, 1995 to preserve the public safety, health, or general welfare of the state.

The motion received unanimous approval.

Ms. Rippie also presented a Summary of ESSB 5684 Re Lobbyists and the "L-2 Reporting Guide" she has developed as a reference for lobbyists.

MOTION 95-093

Moved by Ms. Heninger, seconded by Ms. Marchisio:

The Commission adopts the Summary and L-2 Reporting Guide as interpretations.

The motion received unanimous approval.

Reporting
Modifications
New

Richard Roozen, candidate for Mt. Vernon School Board, requests to not report the business customers of Washington Bulb Company except for trade accounts over \$5,000 in the State of Washington, stating that domestic and foreign firms that acquire the company's trade account information could benefit at the company's expense.

MOTION 95-094

Moved by Ms. Heninger, seconded by Ms. Marchisio:

The Commission grants Richard Roozen a modification of the reporting requirements to satisfy the reporting requirements of RCW 42.17.241(1)(g)(ii) by identifying for the appropriate reporting period any customers of the Washington Bulb Company that do business in the State of Washington, or whose interests may be significantly affected by the actions of the City Council of the City of Mount Vernon.

Transfer of Surplus Contributions to a Candidate's Campaign for a Different Office

Issue date: May 25, 2023 - 12:00pm

Cite as PDC Interpretation No. 23-01

A candidate who solicits or receives contributions for a state, local, or judicial office may not use those contributions to further that same person's candidacy for a different office without first obtaining written approval from the applicable contributor. RCW 42.17A.490. The authorization and required written approval apply to the use of contributions to the original campaign "whether or not surplus". Id. Although it is clear from the overall statutory scheme that the authorized transfers of contributions from an active campaign do constitute contributions to the new campaign for a different office, the treatment of surplus contributions used for a different office warrants further consideration in light of the authorized disposal of surplus funds for other purposes.

Surplus funds include the balance of contributions exceeding the amount necessary to pay the remaining campaign debts and expenses after the election. **RCW 42.17A.005(51)**. The law authorizes the ways a candidate may dispose of surplus campaign funds, which are provided under RCW 42.17A.430. The use of surplus contributions for a campaign for a different office, however, is separately authorized under **RCW 42.17A.490(2)**.

While **RCW 42.17A.430** provides that the disposal of surplus funds expressly authorized under that section of law, including the transfer of surplus funds to a future campaign for the same office, are not considered contributions, there is no comparable exclusion provided for the uses authorized under **RCW 42.17A.490**. Indeed, **RCW 42.17A.490(2)** provides that only where the contributor does not approve the use of their contribution for the candidate's new campaign, the contribution must be disposed as surplus in accordance with **RCW 42.17A.430**.

Based on the statutory scheme, legislative history, and consistent with the policies and purposes of the law to promote transparency and limit influence in candidate elections — including the law's mandate that “[t]he provisions of this chapter shall be liberally construed to promote complete disclosure of all information respecting the financing of political campaigns” (**RCW 42.17A.001**) — the Commission determines that the use of a candidate's surplus contributions for the same person's campaign for a different office are considered contributions to that new campaign. Specifically, when a candidate is transferring surplus contributions from a previously completed election campaign to a new campaign for a different office, those contributions moved to the new campaign must be attributed to their sources, and count toward the contributor's limit for the new campaign. Each contributor whose written approval was obtained must be identified along with their contribution.

Approved May 25, 2023

References: RCWs 42.17A.001, 42.17A.005(51), 42.17A.430, 42.17A.490

Read Guidelines & Restrictions for

Candidates

Lobbyists

Respondent Name
Zachary Zappone
Complainant Name
Glen Morgan
Complaint Description
<p>Glen Morgan reported via the portal (Thu, 4 May 2023 at 5:34 PM)</p> <p>To whom it may concern,</p> <p>It has recently come to my attention that Spokane County Councilman Zach Zappone has committed various violations of Washington State's campaign finance laws (RCW 42.17A). The violations are detailed below.</p> <p>1. Failure to timely file Financial Disclosure Documents. Possible effort to conceal personal financial information from the public (Violation of RCW 42.17A.700, .710)</p> <p>Zach Zappone is currently on the Spokane City Council, but before he barely won the election to this office in 2021, he ran a failed campaign for the Washington State Legislature in District 6, position 1 in 2020. This specific violation is from the time of that well-funded, but ultimately failed political campaign. Candidate Zappone, just like every candidate running for office, must file a financial disclosure form with the PDC within two weeks of when he originally filed to run for office on May 18, 2020. That F-1 should have covered his financial disclosure information for calendar year 2019. It appears he never did this. He did file a financial disclosure document for calendar year 2020 in early 2021 (see attached), but that is not a replacement for the personal financial information he concealed from the public during that well-funded but ultimately unsuccessful political campaign for the state legislature in 2020.</p> <p>Please inform Councilman Zach Zappone that he must go back and correct his attempt to conceal this critical information from the public. I will note for the record, it appears that Councilman Zappone's challenges complying with the law appear to be a pattern of behavior with his recently filed late F1 for calendar year 2022 (See PDC Enforcement Case #136216).</p> <p>2. Failure to accurately report income/contribution data with the PDC. Possible concealment of true source of campaign funds? (Violation of RCW 42.17A.235, .240)</p> <p>This part of the complaint also appears to involve both Councilman Zappone's failed Legislative campaign (which, interestingly enough, is still filing C3 and C4 documents years after that failed campaign has become nothing more than a painful memory). To understand this initial violation, I will explain what I found: First, review the third version (it was amended several times) of Zappone's first C-4 (Expenditure report) filed with the PDC (PDC C4 Report # 110015923 see attached). This final version of this first C-4 report claims that the campaign began with \$7,860 in the bank account rolled over from the previous campaign. First, this is not possible since this was Zappone's first Spokane City Council race, and there was no previous city council race to roll these funds into his campaign. Recognizing that he probably broke the law with this first report – even after three amendments – I reviewed his C-3 (contribution reports) to see if he ever reported where this money came from. He did not.</p> <p>However, I did review the filed documents from Zappone's failed Legislative race, and it appears that Councilman Zappone might have transferred some of the remaining funds from that campaign to his new City Council campaign, but this is where the additional lawbreaking appears to just get worse. For example, this first C4 report for the Zappone for City Council race was supposed to cover the financial activity covering January 1 - January 31, 2021. This is the time period, according to the C4 Report #110015923 that this mystery \$7,860 was in the campaign bank account (why it took them three tries to get this amount right is an additional mystery). However, when you review the two transactions reported on the Zappone for State Legislature campaign (See PDC C4 Report # 110013514 attached) you can see the dates of transfer reported as being first \$6,115.00 on February 10th, 2021 and the second transfer reported as being on February 28, 2021. Please note that neither of these dates could possibly have been reported on a C4 report for the Spokane County Council race covering the</p>

January 2021 timeframe if these transactions hadn't happened yet as reported by the failed Zappone State Legislature campaign. One or both reports are false and provide false information. Another significant discrepancy that is exposed by comparing these two reports is that the amounts do not add up. Somewhere between the \$6,860 reported by the failed Zappone for State Legislature campaign and the "instant rollover cash hoard" of \$7,860 reported by the 3rd version of the Zappone for Spokane City Council race, a mystery \$1,000 was conjured into existence without attribution of original source or proper reporting as required under RCW 42.17A.235.

I will point out that this campaign uses the same treasurer, Andrew Taylor, for both campaigns, so it seems unlikely that they couldn't figure out the math. Additionally, if the first C4 filed by the Zappone for Spokane City Council race is incorrect, this means every C4 after that is inaccurate, and even a first time amateur treasurer would know to check Line 18 from the C4 with the bank statement from the previous month. Clearly this was not done, or someone secretly inserted an extra unreported \$1,000 into this campaign.

Which leads to the next obvious legal violation by this crew...

3. Illegal contribution from one candidate political campaign to another political campaign (Violation of RCW 42.17A.430(8))

The failed Zappone for state legislature campaign committee appears to have attempted to circumvent the clear legal prohibitions as explained in RCW 42.17A.430(8) when they reported a transfer of \$1,000 to the Zappone for Spokane City Council committee (See PDC Report 110019711 on 4/3/2021 – attached). While this transfer of funds would be illegal on its face, the Zappone for City Council race decided to just pretend it never happened, and so they reported nothing from this transaction. There are no corresponding C3s that match this mystery, illegal \$1,000 contribution. This would be an additional violation by concealing this information from the public, just as this campaign did with the initial "transfer" contributions that were never reported on any C3 at any time by this campaign (again, specifically, this is a violation of RCW 42.17A.235, .240)

4. Failure to get written approval by donors to transfer funds to campaign for different office (Violation of RCW 42.17A.490)

Based on the slipshod reporting, the apparent illegal collusion between these two political campaigns, sharing of the treasurer, and the obvious failures by the Zappone campaign to even marginally comply with Washington State campaign finance laws, it appears extremely likely that this campaign completely failed to get formal written approval to transfer these unaccountable funds left over in his failed 2020 legislative campaign to transfer to his Spokane City Council race.

PDC staff should request evidence of this written approval because the circumstantial evidence seems to indicate this was never done according to the legal requirements defined in RCW 42.17A.490.

Finally, I will point out that this candidate has self-reported his expertise in following Washington State's campaign finance laws when he responded to the PDC during an investigation of his campaign by PDC staff in 2021 (See PDC Enforcement Case #99799). He presented himself as extremely knowledgeable at the time, yet it appears while he was putting on that façade to PDC staff for one type of violation and investigation, his campaign was clearly operating in total defiance of the law as explained above.

This should invite a much more detailed level of scrutiny of this campaign and perhaps some required education of this political candidate and his treasurer so that they become more effective at following the law in the future. Between these two political campaigns, they have acquired and spent almost \$300,000, and this should be more than enough cash and experience to learn how to follow the law.

Let me know if you need any additional information.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?
The public has a right to know who is funding these political campaigns, if these candidates and politicians can follow the law, if they are dishonest, if they can't do math (even when they are teachers), and if they even care about telling the truth to the public. What the heck is going on with this crew?
List of attached evidence or contact information where evidence may be found
I've referenced the most relevant PDC docs both by tracking number within the body of the complaint, but also as copied to this complaint for easier reference by staff.
List of potential witnesses
Clearly this candidate and his treasurer should both be interviewed. Additionally, it is worth getting the bank statements for this campaign (or both campaigns) to see why nothing lines up or matches. If the C4s are not reporting the accurate bank account statement, that will be further red flags to investigate this one further.
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.

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE

110013514

03-25-2021

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

(Friends of Zack Zappone)

Mailing Address

PO Box 48697

City

Spokane, WA

Zip + 4

99208

Office Sought (Candidates)

STATE REPRESENTATIVE

Election Date

2020

***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)

02/01/21

To (end of period)

02/28/21

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)	\$	\$193,471.62
2. Cash received (From line 2, Schedule A)	\$	\$0.00
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)		\$0.00
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	(\$105.23)
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	(\$105.23)
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$193,366.39
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)		\$185,078.48
11. Total cash expenditures (From line 4, Schedule A)		\$6,866.53
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)		\$6,866.53
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	(\$105.23)
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	(\$105.23)
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$191,839.78

CANDIDATES ONLY

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

Treasurer's Daytime Telephone No.:

(509) 325-4402

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$1,526.61
[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)	\$1,526.61

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

ZACHARY ZAPPONE

03/25/21

Andrew Taylor

03/25/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

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

Report Date

(Friends of Zack Zappone)

02/01/21

02/28/21

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

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ \$0.00

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	\$6.53
02/10/21	FRIENDS OF ZACK ZAPPONE - PO Box 48697 Spokane, WA 99208		transfer surplus funds to Friends of Zack Zappone Spokane City 2021	\$6,115.00
02/28/21	FRIENDS OF ZACK ZAPPONE - PO Box 48697 Spokane, WA 99208		contribution to Zack Z 2021 City of Spokane councilmember campaign	\$745.00

Total from attached pages \$ \$0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ \$6,866.53

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
 110015923
 AMENDS
 110012805
 04-12-2021

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

(Friends of Zack Zappone)

Mailing Address

PO Box 48697

City

Spokane, WA

Zip + 4

99208

Office Sought (Candidates)

CITY COUNCIL MEMBER

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)

01/31/21

To (end of period)

01/31/21

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)	\$	\$7,860.00
2. Cash received (From line 2, Schedule A)	\$	\$0.00
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)		\$0.00
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)		\$7,860.00
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)		\$0.00
11. Total cash expenditures (From line 4, Schedule A)		\$0.00
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)		\$0.00
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)		\$0.00

CANDIDATES ONLY

Won Lost Unopposed Name not on ballot

Primary election ☐ ☐ ☐ ☐

General election ☐ ☐ ☐ ☐

Treasurer's Daytime Telephone No.:

(509) 325-4402

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$7,860.00
[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)	\$7,860.00

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

ZACHARY ZAPPONE

04/12/21

Andrew Taylor

04/12/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

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

Report Date

(Friends of Zack Zappone)

01/31/21

01/31/21

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

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ \$0.00

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.

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ON NEXT PAGE

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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	

Total from attached pages \$ \$0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ \$0.00

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
 110019711
 05-10-2021

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

(Friends of Zack Zappone)

Mailing Address

PO Box 48697

City

Spokane, WA

Zip + 4

99208

Office Sought (Candidates)

STATE REPRESENTATIVE

Election Date

2020

***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)

04/01/21

To (end of period)

04/30/21

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) \$ **\$193,471.62**

2. Cash received (From line 2, Schedule A) \$ **\$105.23**

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) **\$105.23**

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) **\$193,576.85**

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) **\$191,846.31**

11. Total cash expenditures (From line 4, Schedule A) **\$1,006.53**

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) **\$1,006.53**

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) **\$192,852.84**

CANDIDATES ONLY

Won Lost Unopposed Name not on ballot

Primary election ☒ ☐ ☐ ☐

General election ☐ ☒ ☐ ☐

Treasurer's Daytime Telephone No.:

(509) 325-4402

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17) **\$724.01**
 [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) **\$724.01**

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

ZACHARY ZAPPONE

05/10/21

Andrew Taylor

05/10/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

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

Report Date

(Friends of Zack Zappone)

04/01/21

04/30/21

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
04/08/2021	\$105.23					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ \$105.23

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:

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T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

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- 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	\$6.53
04/03/21	FRIENDS OF ZACK ZAPPONE - PO Box 48697 Spokane, WA 99208		contribution to Friends of Zack Zappone 2021 Spokane councilmember campaign	\$1,000.00

Total from attached pages \$ \$0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ \$1,006.53

Financial Affairs Disclosure - Washington State Public Disclosure Commission

Zachary Zappone

Covering January 4, 2020 - January 3, 2021

Candidacies:

CITY COUNCIL MEMBER - CITY OF SPOKANE - City Council Member District 3, Position 2 - 2021 General
STATE REPRESENTATIVE - LEG DISTRICT 06 - HOUSE - State Representative Pos. 1 - 2020 General

* Unless otherwise indicated, all reported information pertains to Zachary Zappone.

Submitted date: 1/11/2021

Certified by: Zachary Zappone

Email: zzappone@gmail.com

SUBMISSION HISTORY

Income

Reportable income, including wages, tips, sales commissions, stock options, non-investment retirement income and miscellaneous income such as legal judgments, rental property income, etc.:

Princeton University

Treasurer's Office, 701 Carnegie Center, Suite 442

Princeton, NJ 08544

Earned by: Zachary Zappone

Income: \$0.00 to \$29,999.00

Type: Graduate Student

Putney Student Travel

345 Hickory Ridge Road

Putney, VT 05346

Earned by: Zachary Zappone

Income: \$0.00 to \$29,999.00

Type: Trip Leader

Spokane Public Schools

200 N Bernard

Spokane, WA 99208

Earned by: Zachary Zappone

Income: \$0.00 to \$29,999.00

Type: Teacher

Kennewick School District

1000 W 4th Ave

Kennewick, WA 99336

Earned by: Zachary Zappone

Income: \$0.00 to \$29,999.00

Type: Substitute Teacher

Mead School District #354

2323 E Farwell Rd

Mead, WA 99021

Earned by: Zachary Zappone

Income: \$0.00 to \$29,999.00

Type: Substitute teacher

Nine Mile Falls School District

10110 W. Charles Rd.

Nine Mile Falls, WA 99026

Earned by: Zachary Zappone

Income: \$0.00 to \$29,999.00

Type: Substitute teacher

unemployment income

PO Box 9046

Olympia, WA 98507

Earned by: Zachary Zappone

Income: \$0.00 to \$29,999.00

Type: unemployment insurance - pandemic

Assets

Financial assets and interest income are reported from bank accounts, insurance policies, broker-directed investment accounts, self-directed investment accounts and other financial assets:

American Funds Service Company

PO Box 6007

Indianapolis, IN 46206

Account owner: Zachary Zappone

Type: stocks

Value: \$30,000.00 to \$59,999.00

Personal

Account owner: Zachary Zappone

EGY - VAALCO Energy Inc

Value: \$0.00 to \$29,999.00

DIS - Walt Disney Co

Income: \$0.00 to \$29,999.00

Value: \$0.00 to \$29,999.00

TD Ameritrade

PO Box 2209

Omaha, NE 68103

Account owner: Zachary Zappone

Type: stocks

Income: \$0.00 to \$29,999.00

Value: \$0.00 to \$29,999.00

Real estate

Real estate owned in the state of Washington:

There is no real estate owned in Washington State.

Debt

Creditors owed more than \$2,400:

Creditor name: FedLoan Servicing

Owed by: Zachary Zappone

PO Box 69184

Harrisburg, PA 17106

Original amount: \$0.00 to \$29,999.00

Ending amount: \$0.00 to \$29,999.00

Payment terms: 77 months

Security given: student loan

Business associations

Business entities where Zachary Zappone owns 10 percent or more, or serves as an officer, director or general partner.

North Central High School Alumni Association (Zachary Zappone)

Council Member

12007 N Atlantic Ave

Spokane WA 99218

We support current NC student groups and help recent graduates with college and technical school expenses.

Government Payments

No payments were received by North Central High School Alumni Association from a government agency where Zachary Zappone sought or held office.

Other Government Payments

No payments were received by North Central High School Alumni Association in excess of \$12,000 from a government agency where Zachary Zappone **did not** seek or hold office.

Business Payments

No payments were received by North Central High School Alumni Association in excess of \$12,000 from any business customer.

Lobbying activity

Compensation received for lobbying activities:

No qualifying lobbying activity was done.

Gifts

Gifts of food and beverages worth more than \$50, and travel or seminar expenses made by any outside government agency:

There were no gifts exceeding \$50; nor were there any payments for travel or seminars.

[Zzappone](#)

replied

Sun, 21 May 2023 at 9:57 PM

To: "PDC Support" <pdcsupport@pdc.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

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4 (3/97)	PDC OFFICE USE
	110005862
	AMENDS
	110004380
01-11-2021	

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

(Friends of Zack Zappone)

Mailing Address

PO Box 48697

City

Spokane, WA

Zip + 4 99208	Office Sought (Candidates) STATE REPRESENTATIVE	Election Date 2020	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)
Report Period Covered 12/01/20	From (last C-4) 12/01/20	To (end of period) 12/31/20	
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)	\$	\$193,121.62
2. Cash received (From line 2, Schedule A)	\$	\$1,768.67
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).....		\$1,768.67
5. Loan principal repayments made (From line 2, Schedule L).....		\$0.00
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)		(\$1,418.67)
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)		(\$1,418.67)
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$193,471.62
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)		\$183,548.51
11. Total cash expenditures (From line 4, Schedule A)		\$2,930.01
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).....		\$2,930.01
14. Loan principal repayments made (From line 2, Schedule L).....		\$0.00
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)		(\$1,418.67)
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)		(\$1,418.67)
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....		\$185,059.85

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

Treasurer's Daytime Telephone No.:

(509) 325-4402

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$8,411.77
[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)	\$8,411.77

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
ZACHARY ZAPPONE	01/11/21	Andrew Taylor	01/11/21

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4 (3/97)	PDC OFFICE USE
	110013514
	03-25-2021

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

(Friends of Zack Zappone)

Mailing Address

PO Box 48697

City

Spokane, WA

Zip + 4 99208	Office Sought (Candidates) STATE REPRESENTATIVE	Election Date 2020	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)
Report Period Covered 02/01/21	From (last C-4) 02/28/21	To (end of period) 02/28/21	
Final Report?			
Yes No X			

RECEIPTS

*See next page

Yes

No

- Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) \$ **\$193,471.62**
- Cash received (From line 2, Schedule A) \$ **\$0.00**
- In kind contributions received (From line 1, Schedule B)..... **\$0.00**
- Total cash and in kind contributions received this period (Line 2 plus 3)..... **\$0.00**
- Loan principal repayments made (From line 2, Schedule L)..... **\$0.00**
- Corrections (From line 1 or 3, Schedule C)..... Show + or (-) **(\$105.23)**
- Net adjustments this period (Combine line 5 & 6)..... Show + or (-) **(\$105.23)**
- Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) **\$193,366.39**
- Total pledge payments due (From line 2, Schedule B) **\$0.00**

EXPENDITURES

- Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) **\$185,078.48**
- Total cash expenditures (From line 4, Schedule A) **\$6,866.53**
- In kind expenditures (goods & services) (From line 1, Schedule B) **\$0.00**
- Total cash and in kind expenditures made this period (Line 11 plus line 12)..... **\$6,866.53**
- Loan principal repayments made (From line 2, Schedule L)..... **\$0.00**
- Corrections (From line 2 or 3, Schedule C)..... Show + or (-) **(\$105.23)**
- Net adjustments this period (Combine lines 14 & 15)..... Show + or (-) **(\$105.23)**
- Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)..... **\$191,839.78**

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

Treasurer's Daytime Telephone No.:

(509) 325-4402

CASH SUMMARY

- Cash on hand (Line 8 minus line 17) **\$1,526.61**
 [Line 18 should equal your bank account balance(s) plus your petty cash balance.]
- Liabilities: (Sum of loans and debts owed) **\$0.00**
- Balance (Surplus or deficit) (Line 18 minus line 19) **\$1,526.61**

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
ZACHARY ZAPPONE	03/25/21	Andrew Taylor	03/25/21

SCHEDULE
to C4

A
(11/93)

(11/93)

2

Report Date

02/01/21

02/28/21

[illegible]

Enter also on line 2 of C4 \$ \$0.00

- 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.

- 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

- 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..
- Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- 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	\$6.53
02/10/21	FRIENDS OF ZACK ZAPPONE - PO Box 48697 Spokane, WA 99208		transfer surplus funds to Friends of Zack Zappone Spokane City 2021	\$6,115.00
02/28/21	FRIENDS OF ZACK ZAPPONE - PO Box 48697 Spokane, WA 99208		contribution to Zack Z 2021 City of Spokane councilmember campaign	\$745.00

Enter also on line 11 of C4 \$ \$6,866.53

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4 (3/97)	PDC OFFICE USE
	110019711
	05-10-2021

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

(Friends of Zack Zappone)

Mailing Address

PO Box 48697

City

Spokane, WA

Zip + 4 99208	Office Sought (Candidates) STATE REPRESENTATIVE	Election Date 2020	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)
Report Period Covered 04/01/21	From (last C-4) 04/30/21	To (end of period) 04/30/21	
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)	\$	\$193,471.62
2. Cash received (From line 2, Schedule A)	\$	\$105.23
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).....		\$105.23
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)		\$193,576.85
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)		\$191,846.31
11. Total cash expenditures (From line 4, Schedule A)		\$1,006.53
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).....		\$1,006.53
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).....		\$192,852.84

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

Treasurer's Daytime Telephone No.:

(509) 325-4402

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$724.01
[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)	\$724.01

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
ZACHARY ZAPPONE	05/10/21	Andrew Taylor	05/10/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

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

Report Date

(Friends of Zack Zappone)

04/01/21

04/30/21

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
04/08/2021	\$105.23					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$105.23**

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

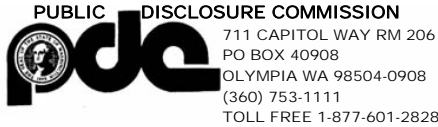
- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- 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	\$6.53
04/03/21	FRIENDS OF ZACK ZAPPONE - PO Box 48697 Spokane, WA 99208		contribution to Friends of Zack Zoppone 2021 Spokane councilmember campaign	\$1,000.00

Total from attached pages \$ **\$0.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$1,006.53**



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4 (3/97)	PDC OFFICE USE
	110015923
	AMENDS
	110012805
	04-12-2021

Candidate or Committee Name (Do not abbreviate. Include full name) (Friends of Zack Zappone)	
Mailing Address PO Box 48697	City Spokane, WA

Zip + 4 99208	Office Sought (Candidates) CITY COUNCIL MEMBER	Election Date 2021
Report Period Covered 01/31/21	To (end of period) 01/31/21	Final Report? Yes No X

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

RECEIPTS

*See 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)	\$	\$7,860.00
2. Cash received (From line 2, Schedule A)	\$	\$0.00
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)		\$0.00
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)		\$7,860.00
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)		\$0.00
11. Total cash expenditures (From line 4, Schedule A)		\$0.00
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)		\$0.00
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)		\$0.00

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

Treasurer's Daytime Telephone No.:
(509) 325-4402

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17) [Line 18 should equal your bank account balance(s) plus your petty cash balance.]	\$7,860.00
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$7,860.00

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 _____