



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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March 16, 2021

Sent Electronically to Mark Miloscia and Tom Perry, 2018 Campaign Treasurer

Subject: PDC Audit Report Cover Letter, 2018 Mark Miloscia for Senate Campaign audit, PDC Audit No. 20-03

Senator Miloscia and Mr. Perry:

This letter is to inform you that PDC staff has completed the limited-scope audit of the 2018 Mark Miloscia for Senate Campaign (Campaign). Staff's audit found:

- The Campaign substantially complied with the candidate reporting requirements found in RCW 42.17A and WAC 390, concerning the timely and accurate filing of the Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) reviewed as part of this audit.
- Documentation provided for selected expenditures as part of the Campaign books of account verified the expenditure information disclosed on the Schedule A to C-4 reports. Staff also noted that creating a separate entry for expenditures less than \$50 in the ORCA campaign filing software or vendor software used by the Campaign was a good way to accurately document those expenses.
- Practices concerning contribution and expenditure activities and internal control procedures were sound and properly facilitated the timely and accurate disclosure of activities undertaken by the Campaign during the 2018 election cycle.

Thank you both for fully cooperating with PDC staff concerning this audit. If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Electronically Signed Kurt Young,
PDC Compliance Officer

s/ _____
Electronically Signed Peter Lavallee,
PDC Executive Director



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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17A

2018 Mark Miloscia for Senate
Campaign

Respondent.

PDC Audit No. 20-03

Audit Report

I.

Audit Scope

- The Public Disclosure Commission (PDC) has the authority under RCW 42.17A.105 and .110 to conduct audits of candidates, committees and other filing entities.
- Initiative 134, a statewide initiative concerning campaign finance and contribution limits was overwhelmingly approved by voters in 1992 and included the requirement for the PDC to conduct audits of filers. The audits are meant to provide the public with information about candidates, political committees and other filers, and to determine those filers degree of compliance with the reporting requirements and provisions of RCW 42.17A required for all required filers” in accordance with RCW 42.17.365.
- The audit findings provide PDC staff with an opportunity to identify problem areas in reporting campaign or committee contribution and expenditure activities that may suggest a need to revise advice and guidance given to filers, to recommend or initiate changes in the law, to adopt or revise the rules for reporting, and if necessary, enforcement. The Commission believes that the primary purposes of conducting audits are to:
 1. Verify that the information disclosed on the candidates and political committee campaign finance reports is timely and accurate in accordance with RCW 42.17A.
 2. Determine whether candidates and political committee are in substantial compliance with the law, rules and reporting requirements.
 3. Evaluate record keeping and reporting procedures used by filers and suggest corrective action to ensure future compliance with the law, or law/rule changes as necessary depending on the audit findings.

- PDC staff selected four State Senate races from the 2018 election cycle, involving eight Legislative candidates for limited-scope audits to be conducted based in on the audit criteria established by staff. The audit criteria included both 2018 Senate candidates in each Legislative District to have been in a contested 2018 general election, with both candidates disclosing significant contribution and expenditure activities, and the election had a lot of public interest.
- Once the eight audits have been completed, PDC staff will be selecting eight Legislative candidates for State Representative from the 2020 election cycle to conduct limited-scope audits based on the same audit criteria listed above.

II.

Audit: Respondent Background

- In 2018, Mark Miloscia was an incumbent Washington State Senator from the 30th Legislative District since being elected to that office. Prior to that, Senator Miloscia served four + terms as a State Representative from the 30th Legislative District.
- On February 9, 2017, Mark Miloscia filed a Candidate Registration (C-1 report) declaring his candidacy for re-election to the office of State Senator in the 30th Legislative District in 2018, selecting the Full Reporting Option and listing Tom Perry, as the Ministerial Treasurer and the only Campaign Officer.
- On January 26, 2021, PDC staff sent an email to Senator Miloscia, and Tom Perry, Treasurer for the 2018 Mark Miloscia Campaign, and attached a letter notifying him that staff was conducting audits of four 2018 contested Senate races as previously explained in an earlier email sent to them. The letter stated staff was conducting a limited-scope audit of the two 2018 candidates that ran for State Senator in the 30th Legislative District, which included Senator Miloscia. The letter requested documentation maintained by the Campaign for selected expenditures made during the 2018 election cycle, in addition to a brief narrative concerning general contribution and expenditure campaign practices, including the record keeping of the campaign books of account in order to complete the audit work.
- As noted above, the audits provide the PDC and the public with an opportunity to determine the degree of compliance with the PDC reporting requirements, thereby enhancing and strengthening the public's confidence in the campaign finance information being disclosed by filers. The audits also assist in identifying areas in the reporting of campaign contribution and expenditure activities that may suggest a need to update or revise the advice on the PDC website in the PDC online candidate manuals, and from Filer Assistance staff, and areas of potential changes in the law or amendments made to the PDC rules to further clarify a specific reporting requirement.
- The limited-scope audits consist primarily of reviewing the Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by each Campaign, and queries conducted by PDC staff of the contribution and expenditure databases on the PDC website. The information is reviewed to determine the Campaigns timeliness and accuracy in disclosing contribution and expenditure activities undertaken on the C-3 and C-4 reports in accordance with the reporting requirements found in RCW 42.1A.235 and .240.

III. **Audit Findings**

- The 2018 Mark Miloscia for Senate Campaign – Miloscia Committee (Campaign) disclosed receiving \$560,643.64 in total contributions and \$547,427.21 in total expenditures made during the 2018 election cycle, with \$13,216.43 as a cash on hand balance through June 30, 2019 on the “Final C-4 report” filed on July 10, 2019. On January 1, 2017, the Campaign received a \$2,500 transfer from the Mark Miloscia Surplus Funds account as the beginning balance for the 2018 Campaign.

Timeliness and Accuracy in the filing of C-3 reports disclosing contributor information:

- Candidates appearing on the 2018 primary and general election ballots who selected the Full Reporting option were required to file weekly C-3 reports every Monday beginning June 1, 2018 through the date of the general election, disclosing contributions that were received and deposited the previous seven days. Prior to June 1, 2018, candidates were required to file monthly C-3 reports for deposits of campaign contributions made during the month or period covered by the C-4 report.
- RCW 42.17A.220 requires candidates to timely deposit monetary contributions received into the campaign bank account or depository within five business days of receipt.
- For the 2018 election cycle, the Campaign filed C-3 reports disclosing contributions received covering the period January 15 through December 31, 2018, that included 1,522 separate monetary and in-kind contributions totaling \$560,643.64. The \$560,643.64 in total monetary and in-kind contributions received included anonymous and small non-itemized contributions as disclosed on C-3 reports.
- The Campaigns four largest contributors in 2018 included the following political party committees and caucus political committees:
 1. Senate Republican Campaign Committee (SRCC): The Campaign disclosed receiving a total of \$72,201 in contributions from the SRCC during the 2018 election, that included 13 monetary and in-kind contributions.
 2. Washington State Republican Party (WSRP): The Campaign disclosed receiving a total of \$70,500 in contributions from the WSRP during the 2018 election cycle, that included a \$50,000 monetary contribution received on October 3, 2018, and a \$20,000 monetary contribution received on October 25, 2018.
 3. King County Republican Party (KCRP): The Campaign disclosed receiving a total of \$35,000 in contributions from the KCRP during the 2018 election cycle, that included a \$30,000 monetary contribution received on October 15, 2018.
- The Campaign disclosed receiving four separate anonymous contributions totaling \$124 during the 2018 election, and 30 separate entries for Miscellaneous Receipts totaling \$730.47, mostly for monthly bank interest. The Campaign itemized all monetary contributions, so there were no small un-itemized contributions disclosed on line 1e on the C-3 reports filed.

- Based on the number of C-3 reports filed by the Campaign for the 2018 election, staff reviewed every fifth C-3 report filed for contributions received and deposited beginning June 1, 2018, when the C-3 report accelerated reporting requirements began for 2018 candidates. Under that reporting requirement, C-3 reports are required to be filed every Monday for contributions received and deposited the preceding seven calendar days. The 2018 C-3 reports filed by the Campaign and reviewed by staff included the following:

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
5/29/2018	6/1/2018	Seven contributions rec'd, all from individuals: \$2,000 cont. from George Weyerhaeuser.	\$3,200	6/4/2018	0
6/7/2018	6/13/2018	Seven-page C-3 report listing 61 separate contributors: \$2,000 cont. from Credit Union Action + \$1,000 cont. from WA Optometric PAC	\$7,770	6/18/2018	0
6/20 – 6/23/2018	6/26/2018	Seven contributions rec'd: \$1,000 cont. from AT & T; \$1,000 from Port Blakely.	\$2,610	7/2/2018	0
7/2 – 7/5/2018	7/10/2018	Three-page C-3 report listing \$2,000 cont. from WA Hospitality PAC; \$2,000 cont. from PS Employee PAC; \$1,000 from Walgreens	\$8,690	7/16/2018	0
7/11/2018	7/18/2018	Three-page C-3 report listing \$2,000 cont. from a retired husband/spouse from Medina.	\$3,985	7/23/2018	0
7/19 – 7/20/2018	7/24/2018	Three-page C-3 report listing \$2,000 cont. from the Kalispel Tribe; \$2,000 cont. from WA Affordable Housing Council PAC; and \$2,000 from WA St Tree Fruit Assn.	\$8,575	7/30/2018	0
8/4 – 8/6/2018	8/9/2018	11 contributions rec'd including \$2,000 cont. from WashBank PAC; \$2,000 cont. from WA State Council of FF.	\$8,525	8/13/2018	0
8/8/2018	8/22/2018	Three contributions rec'd: \$1,000 cont. from Ash Grove Cement Company; \$1,000 from Southern Glazer's Wine.	\$2,200	8/27/2018	0
9/5/2018	9/7/2018	Seven contributions rec'd including \$2,000 cont. from a husband/spouse from Auburn; \$1,000 cont. from Puget Sound Energy + \$40 anonymous cont.	\$3,550	9/10/2018	0
9/13/2018	9/20/2018	Four-page C-3 report listing \$1,000 cont. from WA Hospital PAC; \$1,000 cont. from WA Oil Marketers; \$1,000 from WA Veterinary PAC.	\$6,300	9/24/2018	0
9/26-9/29/2018	10/1/2018	Three-page C-3 report listing \$1,000 cont. from Monsanto; \$1,000 cont. from WA St Council of Police PAC; \$650 from WA Farm Bureau PAC.	\$6,780	10/2/2018	0

10/1 – 10/4/2018	10/5/2018	Three-page C-3 report listing a \$50,000 cont. from WA State Republican Party rec'd on 10/3/2018.	\$57,875	10/8/2018	0
10/6/2018	10/9/2018	Three-page C-3 report listing \$1,000 cont. from Health Insurance Agents PAC; \$1,000 from WA Forrest Protection PAC; & two \$1,000 cont. from two individuals.	\$7,359	10/15/2018	0
10/9 – 10/15/2018	10/16/2018	Seven-page C-3 report listing 62 separate contributors including a \$30,000 cont. from King Co Republican Party rec'd on 10/15.	\$46,300	10/23/2018	1
10/23/2018	10/23/2018	Four-page C-3 report listing 38 cont., all from individuals included a \$1,000 cont. and two \$500 cont.	\$5,611	10/29/2018	0
11/2/2018	11/8/2018	Three contributors, all individuals: two \$500 cont. rec'd.	\$1,100	12/10/2108	0
11/10/2018	11/16/2018	One individual cont. \$1,000 from a homemaker.	\$1,000	12/10/2018	0
Totals			\$174,071		

- PDC staff reviewed the 17 C-3 reports filed by the Campaign and listed in the chart above totaling \$174,071 which represented 31 percent of the 560,643.64 in total contributions received during the 2018 election cycle. As noted in the table above, the Campaign timely filed 16 of the 17 C-3 reports reviewed by staff as part of this audit, and the one C-3 report was filed one day late, and two weeks before the November 6, 2018 general election.
- In addition, the review verified that the Campaign timely deposited the contributions received within five business days of receipt in accordance with RCW 42.17A.220 for 16 of the 17 C-3 reports reviewed by staff as part of this audit. The one exception was the C-3 report filed on August 27, 2018, totaling \$2,200 which indicated the Campaign received contributions on August 8, 2018, and deposited on August 22, 2018, seven days late.
- PDC staff downloaded the 2018 contribution database for the Campaign as a CSV file into an Excel spreadsheet, formatted and sorted the spreadsheet, and then conducted a review of the 2018 contributor information disclosed on C-3 reports. As part of that review, staff confirmed the Campaign complied with the 2018 election contribution limits which were \$1,000 for the primary and general elections for any individual, political committee, business, labor union, association, other entities and persons.
- Staff's review also indicated the Campaign disclosed the required Employer and Occupation information for 417 individuals that contributed more than \$100 to the Campaign totaling \$99,302 in contributions received.
- The C-3 report review disclosed the Campaign had an additional 361 individual contributors who donated more than \$100 and listed their Occupation as being "Retired." Those 361 retirees contributed a total of \$43,537 to the 2018 Campaign.
- The PDC audit procedures include staff identifying contributors that made monetary contributions to the Campaign and then verifying or confirming information disclosed concerning that specific contribution.

- For these audits, staff verified or confirmed selected contributions received by the Campaign by reviewing the expenditure reports of continuing political action committees (PAC) that were registered and required to file C-3 and C-4 reports with the PDC in CY 2018, that made contributions in 2018 to the Campaign.
- Staff reviewed the contribution spreadsheet and selected 10 PAC contributors that made monetary contributions totaling at least \$1,000 to the Campaign during the 2018 election, and also reviewed the corresponding C-3 reports filed by the Campaign disclosing each PAC contribution. The review included listing the date the contributions were received, the date the contributions were deposited, and the date the C-3 report was filed.
- Staff then reviewed the C-4 reports filed by the selected contributing PAC listed in the chart below for the corresponding contribution expenditure information disclosed on the Schedule A to C-4 report. The contribution information from the Campaign C-3 reports and the contribution expenditure information from the PAC C-4 reports was entered into the chart below and included the following:

Date Received - Campaign	Contributor name	Amount	C-3 Report Filed	Date Made By Donor	Disclosed by Donor
9/13/2018	WA State Veterinary PAC	\$1,000	9/24/2018	8/29/2018	C-4 report
9/6/2018	WA Dental PAC	\$1,000	9/17/2018	8/29/2018	C-4 report
10/26/2018	Big I PAC	\$1,000	10/28/2018	10/30/2018	C-4 report
9/21/2018	Citizens for a Legislative Majority	\$1,000	10/1/2018	9/21/2018	C-4 report
10/6/2018	Health Insurance Agents PAC	\$1,000	10/15/2018	9/21/2018	C-4 report
10/15/2018	King County Republican Party	\$30,000	10/23/2018	10/15/2018	C-4 report
8/3/2018	Mainstream Republicans of WA PAC	\$1,000	8/4/2018	8/3/2018	C-4 report
10/4/2018	WA Engineers PAC	\$1,000	10/8/2018	8/24/2018	
9/15/2018	WA Food PAC	\$1,000	9/24/2018	8/30/2018	C-4 report
10/11/2018	MACPAC	\$1,000	10/23/2018	10/9/2018	C-4 report

- The review indicated that the Campaign received and deposited all ten of the contributions selected for review within five business days of receipt as required by statute.
- As noted in the chart above, the Campaign disclosed the contributor's names for the 10 monetary contributions from the selected PAC's within zero to 48 days after each PAC disclosed making the contributions. Staff based that information solely on the dates the expenditure for the contribution was disclosed as having been made by the PAC on the corresponding C-4 report, and the date the contribution was disclosed as having been received on the C-3 report filed by the Campaign.

Timeliness and Accuracy in the filing of C-4 reports, providing expenditure information:

- Candidates under the Full Reporting option in 2018 were required to file monthly C-4 reports by the 10th of each month disclosing contribution and expenditure activities incurred in the previous calendar month.

- Candidates appearing on the 2018 primary and general election ballots were required to file the following C-4 reports:
 1. A 21-day Pre-Primary election C-4 report was due on July 17, 2018, covering the period June 1 through July 16, 2018.
 2. A 7-day Pre-Primary election C-4 report was due on July 31, 2018, covering the period July 17 through July 30, 2018.
 3. A Post-Primary election C-4 report was due by September 10, 2018, covering the period August 1 through August 31, 2018.
 4. A 21-day Pre-General election C-4 report was due on October 16, 2018, covering the period September 1 through October 15, 2018.
 5. A 7-day pre-General election C-4 report was due on October 30, 2018, covering the period October 16 through October 29, 2018.
 6. A Post-General election C-4 report was due by December 10, 2018, covering the period October 30 through November 30, 2018.
- During 2018, the Campaign timely filed C-3 and C-4 reports throughout the year including the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports as detailed in the chart below.

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
January 2018 C-4 report	2/12/2018	2/12/2018	\$2.64	\$1,387.76	\$1,000 transfer to Mark Miloscia Surplus Funds	0
February & March 2018 C-4 report	4/10/2018	4/10/2018	\$2,174.15	\$7,282.80	\$5,147 for Payroll for Sharon McCoy + Payroll taxes; \$2,425 IK cont. from the SRCC.	0
April 2018 C-4 report	5/10/2018	5/10/2018	\$9,287.47	\$12,063.13	Four expenditures made to Madison Communications (MC) totaling \$5,055 for 5,000 doorbell pieces, envelopes, signs, graphic design work, consulting.	0
May 2018 C-4 report	6/11/2018	6/11/2018	\$21,010.84	\$15,584.57	Four expenditures made to MC totaling \$6,423 for yard signs, event postcards, graphic design work, and consulting. \$5,120 for Payroll, Payroll Taxes, plus \$477 for filing fee.	0
2018 21-Day Pre Primary C-4 report	7/17/2018	7/17/2018	\$70,133.94	\$29,516.06	Eight expenditures made to MC totaling \$16,360 for two F/R mailers, car	0

					signs, walking pieces, print lapel stickers, graphic design work, and consulting. \$4,506 for Payroll/Payroll Taxes, plus \$2,000 for F/R consulting.	
2018 7-Day Pre Primary C-4 report	7/31/2018	7/31/2018	\$77,575	\$119,353.60	Two expenditures made to Impact Media Group totaling \$69,600 for cable TV buys (7/19 – 8/6). Five expenditures made to MC totaling \$49,004 for four mailers, and video production.	0
2018 Post-Primary C-4 report	9/10/2018	9/10/2018	\$53,218.92	\$86,492.64	Seven expenditures made to MC totaling \$50,857 for two mailers, included \$25,325 for two phone bank expenditures, yard signs, graphic design work and consulting. One \$11,600 expenditure made to Impact Media Group for Online Advertising.	0
2018 21-Day Pre-General C-4 Report	10/16/2018	10/16/2018	\$125,773.71	\$62,596.34	12 expenditures made to MC totaling \$28,144 for F/R mailers, walking pieces, postcards, graphic design work and consulting. Three expenditures made to Impact Media Group made to \$13,538 for Online and Newspaper Advertising.	0
2018 7-Day Pre-General C-4 report	10/30/2018	10/30/2018	\$99,573.38	\$111,867.89	Three expenditures made to Impact Media Group totaling \$91,700 for a \$65,000 cable TV buy (10/16– 11/5); \$20,000 for online advertising, and \$6,700 for video production. Three expenditures made to MC totaling \$18,920 for two mailers, and a F/R letter.	0
2018 Post General election C-4 report	12/9/2018	12/10/2018	\$31,639.04	\$85,723.86	Nine expenditures made to MC totaling \$52,200 for four mail pieces, a F/R letter, \$18,500 for phone banks on 11/7,	0

				video production, graphic design work and consulting. A \$5,400 expenditures made to Impact Media Group for cable TV advertising (10/31 – 11/5).
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- The Campaign disclosed orders placed, debts or obligations on three C-4 reports filed for the 2018 election cycle, that included: (1) \$4,715 in orders placed disclosed on the Post-Primary C-4 report for two fundraising letters and a newspaper advertisement; (2) \$1,023 in orders placed disclosed on the May 2018 C-4 report for event catering; and (3) \$2,641 in orders placed disclosed on the February/March 2018 C-4 report for printing 5,000 doorbelling pieces, envelopes, business cards and signs.
- The Campaign did not disclose orders placed on the 21-Day and 7-Day Pre-Primary and Pre-General Election C-4 reports.
- There were no candidate loans disclosed as having been made to the 2018 Campaign, or loans from any contributor.
- The C-4 reports timely disclosed expenditure information for payments made to vendors using Campaign funds, largely involving political advertisements, and other miscellaneous Campaign services during the 2018 election cycle. The vendors receiving the largest Campaign expenditures during the 2018 election included the following:
 1. The Campaign made 52 expenditures to Madison Communications totaling \$226,964 for services that included services for printing mail pieces, fund raising letters, walking pieces, car signs, for phone banks, video production, graphic design work and consulting as detailed below:
 - Ten expenditures totaling \$79,334 for printing and mailing direct mail political advertisements.
 - Three expenditures totaling \$43,825 for phone banks.
 - Nine expenditures totaling \$29,209 for printing and mailing fundraising letters.
 - Eight expenditures totaling \$15,000 for consulting services.
 - Seven expenditures totaling \$10,017 for graphics design work.
 2. The Campaign made ten expenditures to Impact Media Group totaling \$191,838 for Cable TV political advertising for the periods 7/19 to 8/6, and 10/16 to 11/5, newspaper and online advertising, and video production.
 3. The Campaign made 38 expenditures totaling \$54,745 during the 2018 election for Payroll for Sharon McCoy and Josalun Hasz, and payroll taxes and fees.
- As part of the audit, PDC staff requested the Campaign provide copies of the books of accounts maintained for 17 expenditures listed below that were made by the 2018 Campaign including supporting documentation such as invoices, receipts, cancelled checks, notes, emails, etc.

- On February 19, 2021, the Campaign sent an email to the PDC with several attachments providing the requested the books of account documentation for the expenditures listed in the Audit letter, and a response letter concerning the campaign practices, and other staff questions. PDC staff has included the Campaign expenditures selected for review below, along with a summary of each expenditure including the date, amount and a description of the services disclosed on the C-4 reports, and the documentation provided by the Campaign.
- A summary of the copies of the books of account information provided by the Campaign for the selected campaign expenditures, were reviewed by staff for the expenditures as listed below and included the following (**Audit Exhibit #1**):

1. A \$65,000 expenditure was made on October 18, 2018, to Impact Media Group for Cable TV advertising (10/16/2018 to 11/5/2018).

The documentation provided by the Campaign included a copy of: (a) Campaign check #1263 dated October 18, 2018, made out to Impact Media Group in the amount of \$65,000; and (b) a copy of an Impact Media Group (IMG) Invoice #WAMC 2301 which listed the Date as October 12, 2018, with the payment terms “Due on receipt”, and the description field stated “Media Buy on behalf of the Miloscia Committee, Broadcast Period October 16, 2018 to November 5, 2018, Cable Zone: Federal Way”; and (c)

2. Two expenditures totaling \$19,444.50 were made to the Impact Media Group for “Online Advertising” that included an \$11,600 expenditure made on August 8, 2018, and a \$7,844.50 expenditure made on October 15, 2018.

The documentation provided by the Campaign included a copy of: (a) Campaign check #1227 dated August 8, 2018, made out to Impact Media Group (IMG) in the amount of \$11,600; and (b) Campaign check #12662 dated October 15, 2018, made out to IMG in the amount of \$7,844.50; (c) a copy of an IMG Invoice #WAMC 1081 which listed the Date as July 30, 2018, totaling \$11,600 with the payment terms “Due on receipt”, and the description field stated “Social Media Buy on behalf of the Miloscia Committee, Primary Election, Description: Multi-Platform Social Media Buy: 3 video ads, 4 text ads, 10 banner ads, Mirror Digital and ½ page print”; and (d) a copy of an IMG Invoice #WAMC 2290 totaling \$7,844.50 which listed the Date as October 3, 2018, with the payment terms “Due on receipt”, and the description field stated “Digital Media Buy on behalf of the Miloscia Committee, Website Redesign/Social Media Buy/General Election, Description: Multi-Platform Social Media Buy October 3, 2018 to October 15, 2018.”

3. Three expenditures totaling \$43,825.15 were made to Madison Communications for “Phone Banks” that included two expenditures made on August 8, 2018 (\$18,440.60 and \$6,884.55), and a \$18,500 expenditure made on November 7, 2018.

The documentation provided by the Campaign included a copy of: (a) Campaign check #1228 dated August 8, 2018, made out to Madison Communications Corp. (MCC) in the amount of \$18,440.60; (b) Campaign check #1230 dated August 8, 2018, made out to (MCC) in the amount of \$6,884.55; and (c) Campaign check #1283 dated November 7, 2018, made out to MCC in the amount of \$18,500.

The documentation also included copies of : (a) a MCC Invoice #WAMC 1260 totaling \$18,440.60 billed to the Campaign and listed the Date as August 2, 2018, with the description field stating “Serviced per Agreement, Targeted Phonebanks on behalf of the Miloscia Committee, Live and Automated Calls, July 30, 2018 to August 6, 2018”; (b) a MCC Invoice #WAMC 1272 totaling \$6,884.55 billed to the Campaign and listed the Date as August 7, 2018, with the description field stating “Serviced per Agreement, Phonebanks on behalf of the Miloscia Committee, Supplemental Target Calls, Live and Automated”; and (c) a MCC Invoice #WAMC 1395 totaling \$18,500 billed to the Campaign and listed the Date as October 31, 2018, with the description field stating, “Serviced per Agreement, Targeted Phonebanks on behalf of the Miloscia Committee, GOTV Phones. ”

4. Four expenditures totaling \$25,173.48 were made to Madison Communications for four “Mail Pieces & Postage” that included three expenditures made on November 1, 2018 (\$12,577.47, \$2,236.77, and \$1,393.93, and a \$8,965.85 expenditure made on November 6, 2018.

The documentation provided by the Campaign included a copy of: (a) Campaign check #1274 dated November 1, 2018, made out to MCC in the amount of \$12,577.47; (b) Campaign check #1273 dated November 1, 2018, made out to (MCC) in the amount of \$2,236.77; (c) Campaign check #1275 dated November 1, 2018, made out to MCC in the amount of \$1,393.39; and (d) Campaign check #1281 dated November 6, 2018, made out to MCC in the amount of \$8,965.85.

The documentation also included: (a) a copy of a MCC Invoice #WAMC 1392 totaling \$12,577.47, listing the Date as October 30, 2018, with the description field stating “Serviced per Agreement, Printing and Production...LD30/GE Mailer/Miloscia Closing” to print 25,500 mail pieces with the postage paid by MCC; (b) a copy of a MCC Invoice #WAMC 1393 totaling \$2,236.77, listing the Date as October 30, 2018, with the description field stating “Serviced per Agreement, Printing and Production...LD30/GE Mailer/Miloscia DACA Postcard” to print 2,750 mail pieces with the postage paid by MCC; (c) a copy of a MCC Invoice #WAMC 1384 totaling \$1,393.39, listing the Date as October 30, 2018, with the description field stating “Serviced per Agreement, Printing and Production...Korean-American Community Letter” to print 1,900 mail pieces with the postage paid by MCC; and (d) a copy of a MCC Invoice #WAMC 1355 totaling \$8,965.85, listing the Date as October 14, 2018, with the description field stating “Serviced per Agreement, Printing and Production...GE Mailer 01/Introduction” to print 18,500 mail pieces printed with the postage paid by MCC.

5. Four expenditures totaling \$2,626.67 were made to Facebook between October 31 through November 22, 2018 for Online Advertising that included \$750 on 10/31/18; \$750 on 11/2/2018; \$750 on 11/5/2018; and 11/22/2018.

The documentation provided by the Campaign included a copy of a printout from an accounting program or spreadsheet that included a column with information stating four “POS Withdrawals” were made to Facebook by the Campaign on October 31, 2018 (\$750) ; November 2, 2018 (\$750); November 5, 2018 (\$750); and November 22, 2018 (\$376.67).

6. Two expenditures totaling \$1,057.23 were made to Axiom Strategies for “Robo Calls” on November 6, 2018 (\$807.23) and on November 1, 2018 (\$250).

The documentation provided by the Campaign included a copy of Campaign check #1276 dated November 1, 2018, made out to Axiom Strategies in the amount of \$250, and a copy of an Axiom Strategies Invoice # 9390 totaling \$250 billed to the Campaign and listed the Date as October 31, 2018, with the description field stating, “WA LD 30 Robocall; Total Connects: 1,599.”

The documentation also included a copy of Campaign check #1278 dated November 6, 2018, made out to Axiom Strategies in the amount of \$807.23 and in the memorandum line stated for “Inv. 9441, 9444, and 9459”, and a copy of an Axiom Strategies Invoice # 9459 totaling \$307.23. Invoice #9459 listing the Date as November 3, 2018, with the description field stating “WA LD 30 Robocall 11/2; Total Connects: 2,239”; a copy of an Axiom Strategies Invoice # 9441 totaling \$250, listing the Date as November 2, 2018, with the description field stating “WA LD 30 Robocall 11/1; Total Connects: 1,491”; and (f) a copy of an Axiom Strategies Invoice # 9444 totaling \$250, listing the Date as November 2, 2018, with the description field stating “WA LD 30 Robocall 11/1; Total Connects: 1,491.”

7. One expenditure totaling \$479.15 for “Expenses of \$50 or less.”

The documentation for the \$479.15 expenditure included a copy of printout from the campaign finance software check used by the Campaign of Expenditures made of \$50 or less for the period November 1 through 30, 2018. The expenditures included reimbursements made to the candidate and Sharon McCoy for meals, beverages and food for volunteers, and other Campaign related expenditures made directly to vendors for meals, food for volunteers, office supplies, small ADP payroll fees, and yard sing building materials.

- As part of the audit, PDC staff requested each Campaign provide information concerning general campaign practices such as internal compliance controls, procedures for processing, depositing, recording and disclosure of contribution, procedures for making and reporting expenditures, including for debts, obligations, and orders placed, in-kind contributions, and candidate loans.
- On February 19, 2021, the Campaign sent an email that included an attached memorandum to PDC staff providing the requested information concerning campaign practices, internal compliance controls, procedures for processing and reporting contribution and expenditure activities. **Audit Exhibit #2.** The memorandum was from Tom Perry, 2018 Campaign Treasurer, providing the information as detailed below.

2018 Contribution Process

- The Campaign stated that monetary contributions received at the campaign mailing address, which was personal residence of the candidate, and on occasion Senator Miloscia would receive contributions in person at events, fundraisers, etc. The contributions would then be mailed to Mr. Perry’s home, where he would make copies of the checks, prepare them for deposits, and then take them to the bank to make the deposit. Mr. Perry would make the deposit within one or two days of having received the contributions “in order to ensure that they were in the bank within 5 business days after Mark received them. These deposit batches were put aside, to be entered into the Integrated Solutions Political (ISP) database at a later time.”

- Mr. Perry would then prepare the C-3 reports, either later in the week or during the weekend, and then file the C-3 reports on Mondays, the required filing date after June 1, 2018. The Campaign's online contributions "were processed using Anedot. Every week or so, depending on the activity level, Tom created an export Excel file of the transactions, and initiated a withdrawal of the funds to the bank. These were also entered into the ISP database before filing the C3 on Mondays."

2018 Expenditure Process

- The Campaign had two expenditure processes during the 2018 election that included Senator Miloscia using a Campaign debit card to make small campaign-related purchases. Mr. Perry stated that concerning the debit card expenses, frequently the description provided by viewing the online banking information explained the expenditure, and if more information were needed, he would ask Senator Miloscia.
- For the larger Campaign expenditures made for political advertising, signs, etc. those expenditures were authorized and made by the candidate and were typically done "in coordination with his consultant." The Campaign process for the larger expenditures involved the invoices being emailed to Mr. Perry, who would then write a check make the expenditure to the vendor or consultant. When Mr. Perry entered the expenditure information into the campaign finance software, for descriptions listed on the C-4 reports he relied on "the information from the invoices, and if there were any questions he would email or text Mark asking for more information."
- Concerning the disclosure of orders placed, Mr. Perry would note that a C-4 report deadline was approaching and would ask Senator Miloscia if he knew of any outstanding orders placed for which he has not been made aware of or seen an invoice for.

2018 Campaign Review/Filing of C3 and C4 reports

- Mr. Perry filed the Campaign C-3 reports, and if there was any contributor information missing such as the employer/occupation information, he would email or text Senator Miloscia to obtain that information. Concerning the C-4 reports, once Mr. Perry clarified any expenditure issue/questions he had with Senator Miloscia, he would then file the C-4 reports on the required filing date. Mr. Perry stated that Senator Miloscia "did not review the reports before they were filed."

2018 Campaign Records

- The contribution records maintained by Campaign included copies of all contribution checks or written instruments "were stapled into deposit batches. Contributions by credit card were saved in an Excel file." The expenditure records maintained included copied of every check used to pay vendors and consultants was stapled to a copy of the invoice, and once the expenditure information was "entered into the ISP database all of these were filed in the Miloscia file in Tom's office."

2018 Campaign Books of Account

- The Campaign reiterated what they described above that all of the campaign records were maintained and stored in Mr. Perry's office.
- These 2018 Campaign records were available for public inspection at Mr. Perry's office, but that the Campaign did not receive a request to inspect the records.

2018 Campaign Reimbursements

- The 2018 Campaign had very few reimbursements made to the candidate or campaign staff. The process was the person that was requesting the reimbursement would provide Mr. Perry with "copies of receipts when they were available, or a detailed list of expenses. Tom entered these into an Expense Report spreadsheet, then wrote a check and kept a copy with each Expense Report."

IV.

Audit Documents Reviewed, Provided and Respondent Correspondence

- C-1 reports, C-3 reports, and C-4 reports filed by the 2018 Mark Miloscia for Senate Campaign covering the period of January 1 through December 31, 2018.
- Email exchanges between PDC staff and Tom Perry, Treasurer on behalf of the 2018 Mark Miloscia for State Senate Campaign.
- PDC staff queried the PDC Contribution and Expenditure database for the 2018 Mark Miloscia for State Senate Campaign contribution and expenditure information covering the period of January 1 through December 31, 2018.

V.

Statutes and Rules

- **RCW 42.17A.235 and 240** require continuing political committees under the Full Reporting Option to file timely, accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the committee. 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. Beginning June 1st for every political committees participating in an election, C-4 reports are required 21 and 7 days before each election in which the committee receives contributions or makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same time and are required to be disclosed on a C-3 report filed every Monday for monetary contributions deposited into the committee bank account the previous five business days.
- **RCW 42.17A.220** requires political committee to deposit monetary contributions received shall be deposited by political committee members, paid staff, or treasurers in a depository in an account established and designated for that purpose. Such deposits shall be made within five business days of receipt of the contribution.

Respectfully submitted this 16th day of March 2021.

Electronically Signed Kurt Young
PDC Compliance Officer

Audit Exhibits

Audit Exhibit #1 Documents provided by the 2018 Mark Miloscia for Senate Campaign to the PDC on February 19, 2021, concerning the expenditures selected for audit.

Audit Exhibit #2 Letter/memorandum from Tom Perry, Treasurer for 2018 Mark Miloscia for Senate Campaign emailed to the PDC on February 19, 2021, concerning the campaign practices and procedures.



12900 NE 180th Street, #230
Bothell, WA 98011
(206)617-9762

BILL TO

Miloscia Committee
ATTN: Tom Perry
30720 19th Avenue South
Federal Way, WA 98003

INVOICE WAMC2301

DATE 10/12/2018 TERMS Due on receipt

ACTIVITY	AMOUNT
Media Buy Services per Agreement Media Buy on behalf of the Miloscia Committee	65,000.00

Broadcast Period:
October 16, 2018 to November 5, 2018
Cable Zone:
Federal Way

PAY YOUR BILL BY CREDIT CARD.
We accept VISA, Mastercard, Discover and American Express.

TOTAL DUE \$65,000.00

*Paid 10/18/18
chb #1263*

MILOSCIA COMMITTEE
30720 19TH AVE S
FEDERAL WAY, WA 98003

19-8140/3250

1263

DATE 10/18/18

PAY TO THE
ORDER OF

Impact Media Group

\$ 65,000.00

Sixty Five Thousand and $\frac{no}{100}$

DOLLARS  Security Features
Prevent Counterfeit
Detection Photo.

more than
just money 

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www.becu.org

MEMO _____



 NP



12900 NE 180th Street, #230
Bothell, WA 98011
(206)617-9762

BILL TO

Miloscia Committee
ATTN: Tom Perry
30720 19th Avenue South
Federal Way, WA 98003

INVOICE WAMC1081

DATE 07/30/2018 TERMS Due on receipt

ACTIVITY	AMOUNT
Media Buy Services per Agreement Social Media Buy on behalf of the Miloscia Committee Primary Election	11,600.00

Description:
Multi-Platform Social Media Buy
3 video ads
4 text ads
10 banner ads
Mirror Digital and 1/2 page print ad

PAY YOUR BILL BY CREDIT CARD.
We accept VISA, Mastercard, Discover and American Express.

TOTAL DUE \$11,600.00

*Paid 8/8/18
ch #1227*

MILOSCIA COMMITTEE
30720 19TH AVE S
FEDERAL WAY, WA 98003

19-8140/3250

1227

DATE 8/8/18

PAY TO THE ORDER OF Impact Media Group \$ 11,600.00

Eleven Thousand Six Hundred and 00 ¹⁰ 00 DOLLARS 

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Seattle, WA 98124-9750
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www.becu.org

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 MP



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 Bothell, WA 98011
 (206)617-9762

BILL TO

Miloscia Committee
 ATTN: Tom Perry
 30720 19th Avenue South
 Federal Way, WA 98003

INVOICE WAMC2290

DATE 10/03/2018 **TERMS** Due on receipt

ACTIVITY	AMOUNT
Media Buy Services per Agreement Digital Media on behalf of the Miloscia Committee	7,844.50
Website Redesign / General Election Social Media Buy / General Election Description: Multi-Platform Social Media Buy October 3, 2018 to October 15, 2018	

PAY YOUR BILL BY CREDIT CARD.
 We accept VISA, Mastercard, Discover and American Express.

TOTAL DUE **\$7,844.50**

*paid 10/15/18
 chk #1262*

MILOSCIA COMMITTEE
30720 19TH AVE S
FEDERAL WAY, WA 98003

19-8140/3250

1262

DATE 10/15/18

PAY TO THE
ORDER OF

Impact Media Group

\$ 7844.50

Seven Thousand Eight Hundred Forty Four and $\frac{50}{100}$ DOLLARS

Security Features
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Check on Back

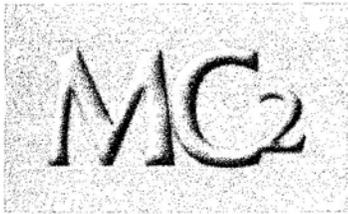
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Yan P.

MP



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 Woodinville, WA 98072
 425.486.8000

INVOICE

BILL TO

Miloscia Committee
 ATTN: Tom Perry
 30720 19th Avenue South
 Federal Way, WA 98003

INVOICE # WAMC1260
DATE 08/02/2018

ACTIVITY	AMOUNT
PhoneBanks Services per Agreement Targeted Phonebanks on behalf of the Miloscia Committee Live and Automated Calls July 30, 2018 to August 6, 2018	18,440.60

PAY YOUR BILL BY CREDIT CARD.
 We accept VISA, Mastercard, Discover
 and American Express.

BALANCE DUE

\$18,440.60

*paid 8/8/18
 chk #1228*

MILOSCIA COMMITTEE
30720 19TH AVE S
FEDERAL WAY, WA 98003

19-8140/3250

1228

DATE

8/8/18

PAY TO THE
ORDER OF

Madison Communications Corp

\$ 18440.60

Eighteen Thousand Four Hundred Forty and $\frac{60}{100}$

DOLLARS



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 425.486.8000

INVOICE

BILL TO

Miloscia Committee
 ATTN: Tom Perry
 30720 19th Avenue South
 Federal Way, WA 98003

INVOICE # WAMC1272
DATE 08/07/2018

ACTIVITY

AMOUNT

PhoneBanks
 Services per Agreement
 Phonebanks on behalf of the Miloscia Committee
 Supplemental Target Calls
 Live and Automated

6,884.55

PAY YOUR BILL BY CREDIT CARD.
 We accept VISA, Mastercard, Discover
 and American Express.

BALANCE DUE

\$6,884.55

paid 8/8/18
 chk #1730

MILOSCIA COMMITTEE
30720 19TH AVE S
FEDERAL WAY, WA 98003

19-8140/3250

1230

DATE 8/8/18

PAY TO THE
ORDER OF

Madison Communications Corp. \$ 6884.55

Six Thousand Eight Hundred Eighty Four + ⁵⁵/₁₀₀ DOLLARS

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Jan R MP



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 425.486.8000

INVOICE

BILL TO

Miloscia Committee
 ATTN: Tom Perry
 30720 19th Avenue South
 Federal Way, WA 98003

INVOICE # WAMC1395
DATE 10/31/2018

ACTIVITY	AMOUNT
PhoneBanks Services per Agreement Targeted Phonebanks on behalf of the Miloscia Committee GOTV Phones	18,500.00

PAY YOUR BILL BY CREDIT CARD.
 We accept VISA, Mastercard, Discover
 and American Express.

BALANCE DUE

\$18,500.00

*paid 11/7/18
 ch# 1283*

19-8140/3250

1283

MILOSCIA COMMITTEE
30720 19TH AVE S
FEDERAL WAY, WA 98003

DATE 11/7/18

PAY TO THE ORDER OF Madison Communications Corp. \$ 18,500.00

Eighteen Thousand Five Hundred and ⁴⁰/₁₀₀ DOLLARS

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MEMO _____

[Redacted]

Jan P. MP



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 Woodinville, WA 98072
 425.486.8000

INVOICE

BILL TO

Miloscia Committee
 ATTN: Tom Perry
 30720 19th Avenue South
 Federal Way, WA 98003

INVOICE # WAMC1392
DATE 10/30/2018

ACTIVITY

AMOUNT

Printing

12,577.47

Services per Agreement
 Printing and Production on behalf of the Miloscia Committee
 LD30 / GEMailer / Miloscia Closing

Quantity:
 25,500

Description:
 9 x 12" Oversized Advocacy Mailer printed CMYK / 2-sides on 80# Type 1
 Gloss Cover, four-edge bleed,
 extra heavy coverage, trim to size

Artwork:
 High-Resolution Large-Format Film Negatives

Mail Prep.:
 Import List x 1, Household x 1, NCOA-Certify x 1, CASS-Certify x 1
 Create Mail File x 1

Imprint Address Information plus Enhanced Barcode x 1
 Sort and Strap for Presorted Standard Flat-Rate Postage
 Deliver to U.S. Post Office

Postage:
 Presort Standard Flat-Rate Postage Paid by Madison Communications Corp.

PAY YOUR BILL BY CREDIT CARD.
 We accept VISA, Mastercard, Discover
 and American Express.

BALANCE DUE

\$12,577.47

*Paid 11/1/18
 chk #1274*

19-8140/3250

1274

MILOSCIA COMMITTEE

30720 19TH AVE S
FEDERAL WAY, WA 98003

DATE

11/1/18

PAY TO THE
ORDER OF

Madison Communications Corp.

\$ 12,577.47

Twelve Thousand Five Hundred Seventy Seven ⁴⁷/₁₀₀ DOLLARS



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Yan Peng

MP

MEMO

[Redacted]



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INVOICE

BILL TO

Miloscia Committee
 ATTN: Tom Perry
 30720 19th Avenue South
 Federal Way, WA 98003

INVOICE # WAMC1393
DATE 10/30/2018

ACTIVITY

AMOUNT

Printing

2,236.77

Services per Agreement
 Printing and Production on behalf of the Miloscia Committee
 LD30 / GEMailer / Miloscia DACA Postcard
 Quantity:
 2,750
 Description:
 5.5 x 8.5" Advocacy Mailer printed CMYK / 2-sides on 100# Type 1 Gloss
 Cover,
 full coverage, trim to size
 Artwork:
 High-Resolution Large-Format Film Negatives
 Mail Prep.:
 Import List x 1, Household x 1, NCOA-Certify x 1, CASS-Certify x 1
 Create Mail File x 1
 Imprint Address Information plus Enhanced Barcode x 1
 Sort and Tray for Presorted First-Class Postage
 Deliver to U.S. Post Office
 Postage:
 Presorted FIRST-CLASS Postage Paid by Madison Communications Corp.

PAY YOUR BILL BY CREDIT CARD.
 We accept VISA, Mastercard, Discover
 and American Express.

BALANCE DUE

\$2,236.77

*paid 11/18
 chk #1273*

19-8140/3250

1273

MILOSCIA COMMITTEE
30720 19TH AVE S
FEDERAL WAY, WA 98003

DATE 11/1/18

PAY TO THE ORDER OF Madison Communications Corp \$ 2236.77

Two Thousand Two Hundred Thirty Six and $\frac{77}{100}$ DOLLARS

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Jo P... NP



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 425.486.8000

INVOICE

BILL TO

Miloscia Committee
 ATTN: Tom Perry
 30720 19th Avenue South
 Federal Way, WA 98003

INVOICE # WAMC1384
DATE 10/30/2018

ACTIVITY

AMOUNT

Printing

1,393.39

Services per Agreement

Printing and Production on behalf of the Miloscia Committee
 Korean-American Community Letter

Quantity:

1,900 packages

Description:

#10 Regular Envelope, printed 1-color / 1-side on 26# White Type 1 Opaque Stock

8.5 x 11" Letter, printed CMYK / 1-side on 60# White Type 1 Opaque Stock

Artwork:

High-Resolution Large-Format Film Negatives

Mail Prep.:

Import Data File x 1, NCOA-certify x 2, CASS-certify x 1, Create Mail File x 1

Address Letter with Variable Salutation x 1

Address Outer Envelope with Variable Data x 1

Fold x 1, Insert x 1, Perfect Match x 2, Live Stamp x 1

Sort and Tray for First-Class Presort Live Stamp Postage

Deliver to U.S. Post Office

Postage:

Presort First-Class Live Stamp Postage paid by Madison Communications Corp.

PAY YOUR BILL BY CREDIT CARD.

We accept VISA, Mastercard, Discover and American Express.

BALANCE DUE

\$1,393.39

*paid 11/18
 chk #1275*

MILOSCIA COMMITTEE
30720 19TH AVE S
FEDERAL WAY, WA 98003

19-8140/3250

1275

DATE 11/1/18

PAY TO THE ORDER OF Madison Communications Corp. \$ 1393.39

One thousand Three Hundred Ninety Three + $\frac{39}{100}$ DOLLARS 

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INVOICE

BILL TO

Miloscia Committee
 ATTN: Tom Perry
 30720 19th Avenue South
 Federal Way, WA 98003

INVOICE # WAMC1355
DATE 10/14/2018

ACTIVITY	AMOUNT
<p>Printing Services per Agreement Printing and Production on behalf of the Miloscia Committee GEMailer01 / Introduction</p> <p>Quantity: 18,500 pieces</p> <p>Description: 8.5 x 11" Advocacy Postcard, printed CMYK / 2-sides on 100# Type 1 Coated cover, heavy coverage, trim to size</p> <p>Artwork: High-Resolution Film Negatives</p> <p>Mail Prep.: Import Data x 1, NCOA-certify x 1, CASS-certify x 1, Create Ink-Jet File x 1 Ink Jet Address plus Enhanced Barcode x 1 Sort and Strap for Presort Standard Flat-Rate Postage Deliver to U.S. Post Office</p> <p>Postage: Presort Standard Flat-Rate Postage paid by Madison Communications Corp.</p>	<p>8,965.85</p>

PAY YOUR BILL BY CREDIT CARD.
 We accept VISA, Mastercard, Discover
 and American Express.

BALANCE DUE

\$8,965.85

*paid 11/6/18
 chq #1281*

19-6140/3250

1281

MILOSCIA COMMITTEE

30720 19TH AVE S
FEDERAL WAY, WA 98003

DATE 11/6/18

PAY TO THE
ORDER OF

Madison Communications Corp. \$ 8965.85

Eight Thousand Nine Hundred Sixty Five and $\frac{85}{100}$ DOLLARS Security Features
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MEMO _____

Ye P...

MP

11/22/2018 POS Withdrawal - FACEBK FS3B4JS7X2 1601 Willow Road	Menlo Park CAUS - Card Ending In 6140	(\$376.67)
11/5/2018 POS Withdrawal - FACEBK AXK4NHN6X2 1601 Willow Road	Menlo Park CAUS - Card Ending In 6140	(\$750.00)
11/2/2018 POS Withdrawal - FACEBK STW7PHS6X2 1601 Willow Road	Menlo Park CAUS - Card Ending In 6140	(\$750.00)
10/31/2018 POS Withdrawal - FACEBK LJG24JN7X2 1601 Willow Road	Menlo Park CAUS - Card Ending In 6140	(\$750.00)
		(\$2,626.67)



1251 NW Briarcliff Parkway, Suite 85
Kansas City, MO 64116
(816) 407-1222

Invoice

Date 10/31/2018

Invoice # 9390

Terms

Bill To

Mark Miloscia

Description	Quantity	Rate	Amount
WA LD 30 Robocall; Total Connects: 1,599		250.00	250.00

Please send wire transfer to the following account:

Bank Name: BMO Routing Number: 071025661 Bank Account Number: 0043147665

Total

\$250.00

paid 11/1/18
ch # 1276
Exhibit #1

MILOSCIA COMMITTEE
30720 19TH AVE S
FEDERAL WAY, WA 98003

19-8140/3250

1276

DATE 11/1/18

PAY TO THE
ORDER OF

Axiom Strategies

\$ 250.00

Two Hundred Fifty and $\frac{10}{100}$

DOLLARS



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800-233-2328 • 206-439-5700
www.becu.org

Jan Perry

MP

MEMO

[REDACTED]



1251 NW Briarcliff Parkway, Suite 85
Kansas City, MO 64116
(816) 407-1222

Invoice

Date 11/3/2018

Invoice # 9459

Terms

Bill To

Mark Miloscia

Description	Quantity	Rate	Amount
WA LD 30 Robocall 11/2; Total Connects: 2,239	1	307.23	307.23

Please send wire transfer to the following account:

Bank Name: BMO Routing Number: 071025661 Bank Account Number: 0043147665

Total

\$307.23

paid 11/6/18

chlc #1278

Exhibit #1



1251 NW Briarcliff Parkway, Suite 85
Kansas City, MO 64116
(816) 407-1222

Invoice

Date 11/2/2018

Invoice # 9441

Terms

Bill To

Mark Miloscia

Description	Quantity	Rate	Amount
WA LD 30 Robocall 11/1; Total Connects: 1,491	1	250.00	250.00

Please send wire transfer to the following account:

Bank Name: BMO Routing Number: 071025661 Bank Account Number: 0043147665

Total

\$250.00

*paid 11/6/18
chc#1278*



1251 NW Briarcliff Parkway, Suite 85
Kansas City, MO 64116
(816) 407-1222

Invoice

Date 11/2/2018

Invoice # 9444

Terms

Bill To

Mark Miloscia

Description	Quantity	Rate	Amount
WA LD 30 Robocall 10/31; Total Connects: 1,926	1	250.00	250.00

Please send wire transfer to the following account:
Bank Name: BMO Routing Number: 071025661 Bank Account Number: 0043147665

Total

\$250.00

*paid 11/6/18
chk #1278
Exhibit #1*

MILOSCIA COMMITTEE
30720 19TH AVE S
FEDERAL WAY, WA 98003

19-8140/3250

1278

DATE 11/6/18

PAY TO THE
ORDER OF

Axiom Strategies

\$ 807.23

Eight Hundred Seven and $\frac{23}{100}$

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just money 

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www.becu.org

MEMO Inw 9441, 9444, 9459



MP

Date	Entity	Compliance Note	Amount
11/01/2018	Walmart	Food for volunteers	\$26.41
11/01/2018	Trinity Ace Hardware	Sign building supplies	\$30.78
11/03/2018	Hyatt Regency Bellevue	Food & drinks	\$18.99
11/04/2018	Walmart	Food for volunteers	\$17.47
11/05/2018	Chipotle	Meals	\$11.55
11/05/2018	Red Robin	Meals	\$28.58
11/06/2018	Domino's Pizza	Food for volunteers	\$17.58
11/07/2018	Jimmy John's	Food for volunteers	\$24.25
11/08/2018	Sharon McCoy	Reimb - Starbucks: Drinks	\$18.64
11/08/2018	Sharon McCoy	Reimb - Jimmy John's: Food for volunteers	\$23.46
11/08/2018	Sharon McCoy	Reimb - Costco: Food for volunteers	\$34.50
11/15/2018	Walmart	Office supplies	\$26.20
11/16/2018	Mark Miloscia	Reimb - Jack in the Box: Meals	\$2.63
11/16/2018	Mark Miloscia	Reimb - Dairy Queen: Food	\$4.39
11/16/2018	Mark Miloscia	Reimb - Panera Bread: Meals (3)	\$14.60
11/16/2018	Mark Miloscia	Reimb - Chipotle: Meals (2)	\$15.40
11/16/2018	Mark Miloscia	Reimb - McDonald's: Food & drinks (3)	\$16.62
11/16/2018	Mark Miloscia	Reimb - Spirit: Meals	\$19.78
11/16/2018	Mark Miloscia	Reimb - Chick-fil-A: Meals (6)	\$20.86
11/17/2018	Panera Bread	Food & drinks	\$8.02
11/23/2018	ADP	Payroll fees	\$10.00
11/29/2018	Walmart	Office supplies	\$44.45
11/30/2018	Payless ShoeSource	Replace shoes	\$43.99
			\$479.15

2018 General Campaign Practices – Mark Miloscia

Below are explanations requested describing the general campaign practices during the 2018 Mark Miloscia campaign for state senate.

Contribution Process

Contributions by check or cash were mailed to the campaign mailing address, which was Mark's home. Mark also occasionally collected checks or cash in person at events, fundraisers, etc. These checks and cash were mailed to Treasurer Tom Perry's home. Tom prepared the deposits, then made copies of the checks. These deposit batches were put aside, to be entered into the Integrated Solutions Political (ISP) database at a later time. Tom then drove to the bank to make the deposit. Deposits were made within a day or two of being received in order to insure that they were in the bank within 5 business days after Mark received them. The C3s were typically prepared late in the week or over the weekend, then filed on Mondays. Online credit card contributions were processed using Anedot. Every week or so, depending on the activity level, Tom created an export Excel file of the transactions, and initiated a withdrawal of the funds to the bank. These were also entered into the ISP database before filing the C3 on Mondays.

Expenditure Process

Mark carried a debit card for making small purchases. Large expenditures such as advertising, signs, etc. were made by Mark, usually in coordination with his consultant, Brett Bader of Madison Communications. Invoices for large expenditures were emailed to Tom, who then wrote a check and mailed it to the vendor. When entering expense descriptions for the C4s, Tom used the information from the invoices, and if there were any questions he would email or text Mark asking for more information. For the debit card expenses, sometimes the description in online banking explained what was purchased. For the unclear ones, Tom also asked Mark for more information. For orders placed, when the filing deadline approached, Tom would ask Mark if there was anything that had been ordered that he hadn't seen an invoice for.

Reviewing and Filing C3 and C4 reports

The C3 reports were filed by Tom, and if there was any employer/occupation information missing Tom would email or text Mark to get more information. Since the expenditure information had already been clarified by Mark if there were questions, Tom would file the C4s on the due date. Mark did not review the reports before they were filed.

Campaign Records

For contributions by check or cash, copies were made of all the checks, and these were stapled into deposit batches. Contributions by credit card were saved in an Excel file. For expenditures paid for by check, a copy of the check was stapled to a copy of the invoice. After being entered into the ISP database all of these were filed in the Miloscia file in Tom's office.

Campaign Books of Account

As described above, all of the campaign records were filed in Tom's office. These campaign records were available for inspection, but no request for inspection was made.

Reimbursements

There were a few reimbursements made to the campaign staff or Mark. The person requesting the reimbursement sent copies of receipts when they were available, or a detailed list of expenses. Tom entered these into an Expense Report spreadsheet, then wrote a check and kept a copy with each Expense Report.