



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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July 28, 2021

Sent Electronically to Mike Volz

Subject: Audit Report – Mike Volz 2020 State Representative Campaign

Dear Representative Volz:

This letter is to inform you that the Public Disclosure Commission (PDC) staff has completed the limited-scope audit of the 2020 Mike Volz for State Representative Campaign (Campaign). Staff's audit found the following:

- Except for a few late filed reports, 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.
- The 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.
- 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 2020 election cycle.

Thank you both for fully cooperating with the PDC staff during this audit. If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [erick.agina@pdc.wa.gov](mailto:erick.agina@pdc.wa.gov).

Sincerely,

Endorsed by:

s/ \_\_\_\_\_  
Electronically Signed Erick Agina  
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

PDC Audit No. 20-15

2020 Committee to Elect Mike Volz  
for State Representative Campaign

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 the findings of reviews conducted of candidates, political committees and other filers, and to determine those filers' degree of compliance with the reporting requirements and provisions of RCW 42.17A.
- 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 the PDC's advice and guidance given to filers, to recommend or initiate changes in the law, or to adopt or revise rules for reporting, and if necessary, for enforcement. The Commission believes that the primary purposes of conducting audits are to:
  1. Verify that the information disclosed on candidate and political committee campaign finance reports is timely and accurate in accordance with RCW 42.17A.
  2. Determine whether candidates and political committees 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 Representative races from the 2020 election cycle, involving eight candidates for limited-scope audits to be conducted based on the audit criteria established by staff. The audit criteria included that both 2020 State Representative candidates in each Legislative District were in a contested 2020 general election, with both candidates disclosing significant contribution and expenditure activities, and the election generated significant public interest.

## **II.**

### **Audit Background**

- On August 2, 2019, Mike Volz (Mike Volz) filed a Candidate Registration (C-1 report) declaring his candidacy for election to the office of State Representative, Position 1, in the 6th Legislative District in 2020, selecting the Full Reporting Option and listing himself as Treasurer.
- On May 14, 2021, the PDC staff sent an email to James Mike Volz for the 2020 Committee to Elect James M. Volz (Mike Volz) Campaign for State Representative and attached a letter notifying him that staff was conducting audits of four 2020 contested State Representative races. The letter stated staff was conducting a limited-scope audit of the two 2020 candidates that ran for State Representative in the 6<sup>th</sup> Legislative District, Position 1, which included Willian Bruch. The letter requested documentation maintained by the Campaign for selected expenditures made during the 2020 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 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 Campaign's 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.
- 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 requirement under RCW 42.17A.235 and .240.

**III.**  
**Audit Findings**

- The 2020 Committee to Elect Mike Volz Campaign for State Representative (Campaign) disclosed \$93,380.36 in total contributions received and \$81,742.26 in total expenditures made during the 2020 election cycle, with \$12,138.10 as cash on hand balance through December 31, 2020, as indicated on the December 2020 C-4 report filed on January 19, 2021.

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

- Candidates appearing on the 2020 primary and general election ballots who selected the Full Reporting option were required to file weekly C-3 reports every Monday beginning June 1, 2020, through the date of the general election, disclosing contributions that were received and deposited the previous seven days. Prior to June 1, 2020, 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 2020 election cycle, the Campaign filed C-3 reports disclosing contributions received covering the period August 2019 through December 23, 2020, that included 184 separate monetary and in-kind contributions totaling \$93,380.36. The \$93,380.36 in total monetary and in-kind contributions received did not include any anonymous contributions or small contributions \$25 or less not itemized as depicted on the C-3 reports.
- The Campaign’s largest contributor in 2020 included the following caucus political committee:
  1. House Republican Organizing Committee (HROC): A total of \$5,000 in in-kind contribution for Banner Ad was received from HROC on October 27, 2020.
- Based on the number of C-3 reports filed by the Campaign, staff reviewed random C-3 reports filed for contributions received and deposited beginning May 2020, when the accelerated C-3 reporting requirements began for 2020 candidates. Under that reporting requirement, C-3 reports are required to be filed every Monday for contributions received and deposited in the preceding seven calendar days. The 2020 C-3 reports filed by the Campaign and reviewed by staff included the following:

<b>Date Received</b>	<b>Date Deposited</b>	<b># of contributors and description</b>	<b>Total C-3 Amount</b>	<b>C-3 Filing Date</b>	<b>Days Late</b>
5/22/2020	5/22/2020	Three total contributions received from two PACs and one entity.	\$1,800.00	6/04/2020	0
6/4/2020	6/4/2020	Three total contributions received from two PACs and one entity.	\$2,500.00	6/8/2020	0

2020 Committee to Elect Mike Volz Campaign for State Representative

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<b>Date Received</b>	<b>Date Deposited</b>	<b># of contributors and description</b>	<b>Total C-3 Amount</b>	<b>C-3 Filing Date</b>	<b>Days Late</b>
6/29/2020	6/29/2020	Three total contributions received from two individuals and one entity.	\$2,500.00	7/2/2020	0
7/1/20 – 7/2/2020	7/2/2020	Two-page C-3 report depicting Four contributions from 13 individuals and one PAC, including \$165 in Small Contributions \$25 or less not itemized.	\$1,920.00	7/2/2020	0
7/6/2020	7/6/2020	Four itemized contributions from three PACs and one individual.	\$2,030.00	7/13/2020	0
7/15/20 – 7/17/2020	7/17/2020	Two-page C-3 report depicting nine itemized contributions rec'd from individuals and entities ranging from \$50 to \$1,000, including a \$5.00 in Small Contributions \$25 or less not itemized.	\$2,005.00	7/20/2020	0
7/21/20 – 7/23/2020	7/24/2020	Four contributions received from two individuals and three entities ranging from \$62.50 to \$500.	\$1,375.00	7/26/2020	0
7/27/20 – 7/31/2020	7/31/2020	Two-page C-3 report depicting contributions received from three PACs and six entities ranging from \$250 to \$1,000.	\$5,750.00	8/2/2020	0
8/3/2020	8/4/2020	Two contributions received from two entities.	\$2,000.00	8/10/2020	0
8/5/2020	8/7/2020	Two contributions received from one PAC and one entity.	\$1,500.00	8/10/2020	0
8/20/20 – 8/21/2020	8/21/2020	One-page C-3 report depicting contributions from two PACs and two individuals.	\$1,800.00	8/24/2020	0
8/27/2020	8/28/2020	One-page C-3 report depicting five itemized contributions from two individuals and three entities.	\$2,535.00	8/31/2020	0
9/16/20 – 9/18/2020	9/18/2020	One-page C-3 report depicting contributions received from three PACs and one individual.	\$2,100.00	9/21/2020	0
9/25/2020	9/25/2020	One-page C-3 report depicting one contribution from a PAC and one small contribution not itemized for \$25.	\$1,025.00	9/28/2020	0
9/30/2020	9/30/2020	One-page C-3 report depicting four contributions from entities and one PAC ranging from \$500 to \$1,000.	\$3,000.00	10/5/2020	0

<b>Date Received</b>	<b>Date Deposited</b>	<b># of contributors and description</b>	<b>Total C-3 Amount</b>	<b>C-3 Filing Date</b>	<b>Days Late</b>
10/2/2020	10/2/2020	One-page C-3 report depicting contributions received from one individual and one entity.	\$1,050.00	10/5/2020	0
10/9/2020	10/9/2020	One-page C-3 report depicting seven itemized contributions received from four individuals, two entities and one PAC.	\$2,725.00	10/11/2020	0
10/9/2020	10/9/2020	One-page C-3 report depicting one contribution from an individual.	\$1,000.00	10/11/2020	0
10/16/2020	10/16/2020	Two-page C-3 report depicting nine total contributions from five individuals, two entities and two PACs ranging from \$17.50 to \$500.	\$2,235.00	10/19/2020	0
10/23/2020	10/23/2020	One-page C-3 report depicting five itemized contributions from three individuals and two entities ranging from \$75 to \$1,000.	\$3,325.00	10/26/2020	0
11/13/2020	11/13/2020	Two-page C-3 report depicting six contributions from one individual, four entities and one PAC ranging from \$50 to \$1,000.	\$3,825.00	11/17/2020	0
12/23/2000	12/23/2020	One-page C-3 report depicting one contribution from an entity.	\$500	12/28/2020	0
<b>Totals</b>			<b>\$46,000.00</b>		

- PDC staff reviewed the 22 C-3 reports filed by the Campaign and listed in the table above totaling \$46,000.00 which represented about 49.3 percent of the \$93,380.36 in total contributions received during the 2020 election cycle. As noted in the table above, the Campaign timely filed all 22 reports reviewed by staff as part of this audit.
- In addition, staff's review verified that the Campaign timely deposited the contributions received within five business days of receipt in accordance with RCW 42.17A.220 for the C-3 reports depicted in the above table.
- PDC staff downloaded the 2020 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 2020 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 (other than the bona fide party committees listed above).
- Staff's review also indicated the Campaign disclosed the required Employer and Occupation information for the 33 individuals who contributed more than \$100 to the Campaign, totaling \$14,750 in contributions received.

- Of the 33 individuals who disclosed their Employer and Occupation information, ten listed their Occupation as being “Retired.” Those ten retirees contributed a total of \$3,300 to the 2020 Campaign.
- The PDC audit procedures include staff identifying contributors that made monetary contributions to the Campaign and then verifying or confirming information disclosed for those specific contributions. For this audit, 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 the 2020 election year and made contributions to the Campaign in 2020.
- Staff reviewed the contribution spreadsheet and selected 10 PAC contributors that made monetary contributions totaling at least \$1,000 to the Campaign during the 2020 election, and reviewed the corresponding C-3 reports filed by the Campaign disclosing each PAC’s contribution. The review included listing the date the contributions were received, the date the contributions were deposited, and the date the C-3 reports were filed.
- Staff then reviewed the C-4 reports filed by the selected contributing Political Action Committee (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 were entered into the chart below and included the following:

<b>Date Received - Campaign</b>	<b>Contributor name</b>	<b>Amount</b>	<b>C-3 Report Filed</b>	<b>Date Made by Donor</b>	<b>Disclosed by Donor</b>
10/27/2019	Washington State Troopers PAC	\$1,000	10/28/2019	10/23/2020	C-4 report
7/27/2020	Washington State Dental PAC	\$1,000	8/2/2020	7/22/2020	C-4 report
10/9/2020	Hospitals for Healthy Future PAC	\$1,000	10/9/2020	10/6/2020	C-4 report
7/6/2020	Build East PAC	\$1,000	7/13/2020	6/23/2020	C-4 report
9/18/2020	NFIB Washington PAC	\$1000	9/21/2020	9/14/2020	C-4 report
7/31/2020	WA Affordable Housing Council	\$1,000	8/2/2020	7/27/2020	C-3 report
10/28/2019	WA State Auto Dealers PAC	\$1,000	11/12/2019	10/24/2019	C-4 report
8/10/2020	WA Society of CPAS PAC	\$1,000	8/10/2020	8/10/2020	C-4 report
12/9/2019	NCUA-Credit Union Legislative Action Fund	\$1,000	12/13/2019	12/4/2019	C-4 report
8/21/2020	ABC PAC-WA	\$1,000	8/24/2020	8/18/2020	C-4 report

- The review indicated that the Campaign received and deposited nine out of ten of the contributions selected for review within five business days of receipt as required by statute. As noted in the table above, the Campaign disclosed the contributors’ names for the 10 monetary contributions from the PACs listed above within seven to 30 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 2020 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, and candidates appearing on the 2020 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 14, 2020, covering the period June 1 through July 13, 2020.
  2. A 7-day Pre-Primary election C-4 report was due on July 28, 2020, covering the period July 14 through July 27, 2020.
  3. A Post-Primary election C-4 report was due by September 10, 2020, covering the period July 28 through August 31, 2020.
  4. A 21-day Pre-General election C-4 report was due on October 13, 2020, covering the period September 1 through October 12, 2020.
  5. A 7-day pre-General election C-4 report was due on October 27, 2020, covering the period October 13 through October 26, 2020.
  6. A Post-General election C-4 report was due by December 10, 2020, covering the period October 27 through November 30, 2020.
  
- During 2020 election year, the Campaign timely filed four out of six 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 (one report was filed a day late, and one was filed nine days late):

<b>C-4 Report</b>	<b>Date Due</b>	<b>Date Filed</b>	<b>Contributions Received</b>	<b>Expenditures Made</b>	<b>Expenditure details</b>	<b>Days Late</b>
May 2020 C-4 report	6/10/2020	6/04/2020	\$1,800	\$527.66	\$527.66 to WA Secretary of State for Candidate Filing Fee.	0

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<b>C-4 Report</b>	<b>Date Due</b>	<b>Date Filed</b>	<b>Contributions Received</b>	<b>Expenditures Made</b>	<b>Expenditure details</b>	<b>Days Late</b>
2020 21-Day Pre Primary C-4 report	7/14/2020	7/14/2020	\$13,010.00	\$560.84	\$560.84 to Walt's Mailing for Fundraising (#500).	0

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C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2020 Post-Primary C-4 report	9/10/2020	9/28/2020 Amended report, original report filed timely.	\$14,660.00	\$900.49	\$871.19 paid to Best Buy for Campaign Laptop.	0

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C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2020 21-Day Pre-General C-4 Report	10/13/2020	10/14/2020	\$11,800.00	\$24,682.43	Four separate expenditures totaling \$17,623.00 paid to Cue11 for Media Buy KXLY 89, iHeart 206, Studio Edit Mix, Media Buy and Studio Mix Edits; \$6,643.78 to Walt's Mailing for jobs numbers 21278/21278; and \$375 to River Marketing for Graphic Design for Mailer.	1

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<b>C-4 Report</b>	<b>Date Due</b>	<b>Date Filed</b>	<b>Contributions Received</b>	<b>Expenditures Made</b>	<b>Expenditure details</b>	<b>Days Late</b>
2020 7-Day Pre-General C-4 report	10/27/2020	10/27/2020	\$6,660.00	\$6,960.30	Four separate expenditures totaling \$6,926.90 paid to Walt's Mailing for Printing and Mailer Production.	0
2020 Post General election C-4 report	12/10/2020	12/19/2020	\$500.00	\$1,449.00	\$1,440 paid to Secure IT Self Storage for Storage. to Ayers Consulting LLC for Treasury Services.	9

- The Campaign did not disclose any orders placed, debts and/or obligation on all six C-4 reports filed during the accelerated period in the 2020 election cycle.

- With the two exceptions noted above, 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 2020 election cycle. The vendors receiving the largest Campaign expenditures during the 2020 election included the following:
  1. The Campaign made eight expenditures to Cue 11 totaling \$35,456.79 for expenditures that included services for media buy, media production and edits, studio edits and Comcast buy as detailed below:
    - Four expenditures on October 9, 2020, totaling \$17,623 for Media, Studio Edit and Mix, and Strategy/Demo.
    - One expenditure on October 27, 2020, totaling \$10,005 for Comcast TV Buys.
    - Three expenditures on July 22, 2020, totaling \$7,828.79 for Media and Media Production/Edits.
  2. The Campaign made six expenditures to Walt's Mailing totaling \$19,322.45 for expenditures that included services for printing and postage, mail prep and production and data processing as noted below:
    - One expenditure totaling \$6,643.78 for Data Processing, Production, Print and Postage (invoice #75613) for date of service 10/6/2020.
    - One expenditure totaling \$5,751.77 for Postage 1866 Fundraising Letters and 1750 Fundraising Letters and Postage (Invoices #75986/75987).
    - One expenditure totaling \$3,981.14 for Data Processing, Production, Print and Postage for date of service 10/16/2020 (Invoice #75888).
    - One expenditure totaling \$2,945.76 for Data Processing, Production, Print and Postage for date of service 10/23/2020 (Invoices #75982/75983).
- As part of the audit, PDC staff requested the Campaign to provide copies of the books of account maintained for five expenditures listed below that were made by the 2020 Campaign including supporting documentation such as invoices, receipts, cancelled checks, notes, emails and any other pertinent materials.
- On June 24, 2021, the Campaign sent an email to the PDC with several attachments providing the requested books of account documentation for the expenditures listed in the Audit letter.

#### **Audit Exhibit #1.**

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 information provided by the Campaign was reviewed by staff for the expenditures listed below and included the following:

1. Seven expenditures were made by the Campaign to Cue 11 totaling \$34,956.79 that included:

- A \$10,123, \$5,000 and \$2,000 expenditures made on October 9, 2020, for “Media Buy: KXLY 89, IHeart 206, Media Buy TBD and Studio Edit Mix,” respectively.
    - The documentation provided by the Campaign included an itemized copy of a ledger depicting \$17,123 payments for checks #1154/1155 made payable to Cue 11, for invoice number 1055.
  - A \$10,005 expenditure made on October 27, 2020, for a “Comcast Ad Buy;”
    - The documentation provided by the Campaign included a copy of a \$10,005 check (#1159) made payable to Cue 11 for “Comcast Ad Buy.” for invoice number 1057 (dated 10/27/2020).
  - A \$3,142 expenditure made on July 22, 2020, for “KISC #58.”
    - The documentation provided by the Campaign included an itemized copy of a ledger depicting a \$3,142 payment made payable to Cue 11 on July 22, 2020.
  - A \$2,652.79 expenditure made on July 22, 2020, for “Production and Edits of DOER, BIO, GOTV.”
    - The documentation provided by the Campaign included an itemized copy of a ledger depicting a \$2,652.79 payment (check #1152) made payable to Cue 11 on July 22, 2020, for invoice number 1044.
  - A \$2,034 expenditure made on July 22, 2020, for KQNT/KIX #51.”
    - The documentation provided by the Campaign included an itemized copy of a ledger depicting a \$2,034 payment made payable to Cue 11 on July 22, 2020, for invoice number 1046.
2. Eight expenditures made to Walt’s Mailing totaling \$19,322.45 that included: (1) two expenditures made on October 8, 2020, totaling \$6,643.78 for invoice “#21278;” (2) two expenditures made on November 2, 2020, totaling \$5,751.77 for printing and postage for invoice “#27495;” (3) two expenditures made on October 23, 2020, totaling \$2,945.76 for invoices “2832 and #3882.”
- The documentation provided by the Campaign included an itemized copy of a ledger depicting (1) \$6,643.78 payment (check #1153); (2) \$5,751.77 payment for printing and postage (check #1158) for invoices #75986/75987; and (3) \$2,945.76 (check# 1157) payment for invoice #2832 and #3882. All checks were made payable to Walt’s Mailing.
3. A \$1,675.55 expenditure made on November 17, 2020, to Action Solutions for “Robocalls 14155.”

- The documentation provided by the Campaign included an itemized copy of a ledger depicting a \$1,675.55 payment made to Action Solutions on November 17, 2020 (check #1161) for invoice #1604.
4. A \$1,162.50 expenditure made on November 1, 2020, to River Marketing for “Design and Layout.”
- The documentation provided by the Campaign included an itemized copy of a ledger depicting a \$1,162.50 payment made to River Marketing on November 1, 2020 (check #1160) for invoice #201027-01.

### **Books of Account, Maintaining Campaign Records, and Internal Control Process:**

As part of the audit, PDC staff requested each campaign to 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 June 24, 2021, the Campaign provided a response to staff’s questions about the internal control processes.

### **Audit Exhibit #2**

#### Campaign Contributions:

The Campaign stated that during the 2020 election, the candidate would check the campaign mailbox “generally checked 2 or 3 times a week, but at least once and deposit the donations in the bank on Friday for the week.” The donation/contributions data would then be entered into ORCA over the weekend for reporting.

The Campaign further stated that the campaign received online donations using PayPal. “Online payments that were received via PayPal were recorded and transferred when received. Transaction costs were recorded separately.”

#### Campaign Expenditures:

All campaign expenditures were ordered and approved by the candidate himself. The candidate consulted/coordinated with the campaign consultant CUE 11 “giving them parameters and budget limits.” The campaign consultant would then place the requested/approved ads. The candidate would then record ad services/purchase in ORCA and pay the bill once the invoice was received by the campaign. The candidate would also review, reconcile and submit all statutory reports after reconciling the C4 reports with the bank records, “noting any in-transit or pending items.”

#### Contribution and Expenditure Reports:

The Campaign’s ORCA bookkeeping was done by the candidate. This included uploading all the C-3 and C-4 reports onto ORCA. According to the Campaign, the treasurer would post to ORCA on the weekends.

The candidate, Mr. Volz, was responsible for curating the campaign records, which he maintained/stored in a file box. The books of account were made available during the public

inspection period, however no-one from the campaign including Mr. Volz received any requests for public inspection.

#### IV.

##### **Audit Documents Reviewed, Provided and Respondent Correspondence**

- C-1 reports, C-3 reports, and C-4 reports filed by the 2020 Mike Volz for State Representative Campaign covering the period August 20, 2019, through December 23, 2020.
- Email exchanges between PDC staff and Mike Volz, on behalf of the Mike Volz 2020 State Representative Campaign.
- PDC staff queried the PDC Contribution and Expenditure database for the 2020 Mike Volz for State Representative Campaign contribution and expenditure information covering the period of August 20, 2019, through December 23, 2020.

#### 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 1<sup>st</sup> for every political committee 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 \_\_\_\_ day of July 2021.

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Erick O. Agina  
PDC Compliance Officer

##### **Audit Exhibits**

**Audit Exhibit #1** Documents provided by the 2020 Committee to Elect Mike Volz Campaign for State Representative to the PDC on June 24, 2021, concerning the expenditures selected for audit.

**Audit Exhibit #2** Letter from the 2020 Committee to Elect Mike Volz Campaign for State Representative provided by the Campaign Treasurer to the PDC on June 24, 2021, concerning the campaign practices and procedures.

	PDC Item #	Inv. No	Check No.	Amount	Actual	
<b>Cue 11</b>	1	10/09/20 \$10,123.00 Media	1055	1154/1155	Media	\$10,123.00
	3	10/09/20 \$5,000.00 Media	1055	1154/1155	Media	\$4,728.00
	7	10/09/20 \$2,000.00 Studio Edit	1055	1154/1155	Stratedgy/Demo	\$2,500.00
	N/A	01/09/20 \$500.00 Studio Mix Edits	1055	1154/1155	Edit Studio	\$272.00
						<u>\$17,623.00</u>
	2	10/27/20 \$10,005.00 Comcast	1057	1159	\$10,005.00	
	4	07/22/20 \$3,142.00 Media	Part of 1046			
6	07/22/20 \$2,034.00 Media	Part of 1046				
5	07/22/20 \$2,652.79 Production/Edits	1044	1152	\$14,899.79		
<b>Total Cue 11</b>		\$35,456.79				
<b>Walt's Mailing</b>	1	10/08/20 \$6,643.78	75613	1153	\$6,643.78	
	2	11/02/20 \$5,751.77	75986/75987	1158	\$5,751.77	
	3	10/16/20 \$3,981.14	75888	1156	\$3,981.14	
	4	10/23/20 \$2,945.76	75982/75983	1157	\$2,945.76	
<b>Total Walt's Mailing</b>		\$19,322.45				
<b>Action Solutions</b>	11/17/20	\$1,675.55	1604	1161	\$1,675.55	
<b>River Marketing</b>	11/01/20	\$1,162.50	201027-01 (revised)	1160	\$1,537.50	Also Paid 201011-02 \$375.00

	Inv	Amount
Also paid	1045	\$2,000.00
on check	1046 Remainder	\$3,041.00
1152	1047	\$2,030.00
		<u>\$7,071.00</u>



A division of Vu Music, Inc.

Tax ID 91-1939436

1318 N Fancher Rd

Spokane Valley, WA 99212

# Invoice

Date	Invoice #
10/5/2020	1055

Bill To
Vote Mike Volz PO Box 10116 Spokane, WA 99209

1, 3, 7

P.O. No.	Terms	Project
	Upon Receipt	

Quan...	Description	Rate	Amount
1	iHeart media buy "Mothers/GOTV" :60 (206)	7,123.00	7,123.00
1	KXLY media buy "Mothers/GOTV" :60 (89)	3,000.00	3,000.00
1	Strategy/Placement demographics	2,500.00	2,500.00
1	Add iHeart media buy "Mothers/GOTV" (127)	4,502.00	4,502.00
1	ACN Saturation Buy "Mothers/GOTV" (???)	226.00	226.00
1	Edit Production	250.00	250.00

Thank You, We appreciate your Business

Subtotal \$17,601.00

Sales Tax (8.8%) \$22.00

**Total** \$17,623.00

Payments/Credits \$0.00

**Balance Due** \$17,623.00



A division of Vu Music, Inc.  
 Tax ID 91-1939436  
 1318 N Fancher Rd  
 Spokane Valley, WA 99212

# Invoice

Date	Invoice #
10/5/2020	1055

Bill To
Vote Mike Volz PO Box 10116 Spokane, WA 99209

P.O. No.	Terms	Project
	Upon Receipt	

Quan...	Description	Rate	Amount								
1	iHeart media buy "Mothers/GOTV" :60 (206)	7,123.00	7,123.00								
1	KXLY media buy "Mothers/GOTV" :60 (89)	3,000.00	3,000.00								
<p>EST</p> <table style="margin-left: 20px;"> <tr> <td>STUDIO/MGT</td> <td>\$2000</td> </tr> <tr> <td>MEDIA/BD</td> <td>5000</td> </tr> <tr> <td>+ STUDIO</td> <td>500</td> </tr> <tr> <td></td> <td><u>7,500</u></td> </tr> </table> <p style="margin-left: 200px;">517,623</p>				STUDIO/MGT	\$2000	MEDIA/BD	5000	+ STUDIO	500		<u>7,500</u>
STUDIO/MGT	\$2000										
MEDIA/BD	5000										
+ STUDIO	500										
	<u>7,500</u>										

<i>Thank You, We appreciate your Business</i>	Subtotal	\$10,123.00
	Sales Tax (0.00)	\$0.00
	<b>Total</b>	<b>\$10,123.00</b>
	Payments/Credits	\$0.00
	<b>Balance Due</b>	<b>\$10,123.00</b>



A division of Vu Music, Inc.  
 Tax ID 91-1939436  
 1318 N Fancher Rd  
 Spokane Valley, WA 99212

# Invoice

Date	Invoice #
10/27/2020	1057

Bill To
Vote Mike Volz PO Box 10116 Spokane, WA 99209

2

P.O. No.	Terms	Project
	Upon Receipt	

Quan...	Description	Rate	Amount
1	Effectv Buy (Fox News, CNN, MSNBC, HGTV, History, Discovery) Ad buys for Comcast Cable 10/26/20 thru 11/2/20	10005.00 0.00	10,005.00 0.00

<i>Thank You, We appreciate your Business</i>	Subtotal	\$10,005.00
	Sales Tax (8.8%)	\$0.00
	<b>Total</b>	<b>\$10,005.00</b>
	Payments/Credits	\$0.00
	<b>Balance Due</b>	<b>\$10,005.00</b>



A division of Vu Music, Inc.  
 Tax ID 91-1939436  
 1622 W Pinehill Rd  
 Spokane, WA 99218

# Invoice

Date	Invoice #
7/6/2020	1044

*Rec'd 7/22*

**0 5**

Bill To
Committee to Elect Mike Volz PO Box 10163 Spokane, WA 99209

P.O. No.	Terms	Project
	Upon Receipt	

5

Quan...	Description	Rate	Amount
1	Image licensing, music licensing and editing for "Doers"	1,838.23	1,838.23T
1	Edits for "Bio" and "GOTV" combo :60	600.00	600.00T

*Thank You, We appreciate your Business*

Subtotal	\$2,438.23
Sales Tax (8.8%)	\$214.56
<b>Total</b>	<b>\$2,652.79</b>
Payments/Credits	\$0.00
<b>Balance Due</b>	<b>\$2,652.79</b>



A division of Vu Music, Inc.  
 Tax ID 91-1939436  
 1622 W Pinehill Rd  
 Spokane, WA 99218

# Invoice

Date	Invoice #
7/8/2020	1046

Rec'd 7/22

~~4,6~~ 4,6

Bill To
Committee to Elect Mike Volz PO Box 10163 Spokane, WA 99209

P.O. No.	Terms	Project
	Upon Receipt	

Quan...	Description	Rate	Amount
✓ 1	iHeart July through Aug 3rd KISC "Doers" :60 (58 Spots)	3,142.00	3,142.00
✓ 1	iHeart July through Aug 3rd KQNT/KIX99 "Bio/Ballots" :60 (51 Spots)	2,034.00	2,034.00
1	iHeart July through Aug 3rd OTT "Doers" :60 (36 Spots/35K Impressions)	1,500.00	1,500.00
1	iHeart July through Aug 3rd KISC Doers KQNT/KIX Mothers :60s (52 spots)	1,541.00	1,541.00

46

Thank You, We appreciate your Business	Subtotal	\$8,217.00
	Sales Tax (8.8%)	\$0.00
	<b>Total</b>	<b>\$8,217.00</b>
	Payments/Credits	\$0.00
	<b>Balance Due</b>	<b>\$8,217.00</b>

# Walt's Mailing Service

Walt's Mailing Service - 9610 E 1st Ave - Spokane Valley, WA 99206-3686  
 Phone: (509) 924-5939 Fax: (509) 924-6923

## Invoice

**Attn:**  
 Committee To Elect Mike Volz  
 P.O. Box 10163  
 Spokane WA 99209

**Job Name:** Primary PC #1

**Invoice #** 75613      **CustCode:** Mik005

**Invoice Date:**

**Date of Service:** 10/6/2020      **PO#:**

**Terms:** Prepay

Qty	Description	Unit Price	Ext Price
<b>Data Processing</b>			
22587	Read File	0.00351	\$79.21
22587	CASS / Addr. Standardize	0.00310	\$70.02
22587	Dup Check	0.00410	\$92.61
22587	DSF Processing	0.00460	\$103.90
21278	Computer Presort Data	0.00170	\$36.17
21278	Format Labels for IJ	0.00240	\$51.07
1	Postal Paper Work	5.83000	\$5.83
-1	Discount	188.69000	(\$188.69)
<b>SubTotal:</b>			<b>\$250.12</b>

### Production

21278	Ink Jet Addressing	0.03000	\$638.34
21278	Mail Prep	0.00930	\$197.89
21278	Political Red Tag Mail	0.00350	\$74.47
-1	Discount	391.60000	(\$391.60)
<b>SubTotal:</b>			<b>\$519.10</b>

### Print

1	Print Services	1565.00000	\$1,565.00
<b>SubTotal:</b>			<b>\$1,565.00</b>

### Postage

Our Permit

1

4101.81	\$4,101.81
<b>Postage Paid:</b>	<b>\$0.00</b>
<b>Postage Used:</b>	<b>\$4,101.81</b>
<b>Postage Subtotal:</b>	<b>\$4,101.81</b>

### Comments:

<b>Sub Total:</b>	<b>\$2,334.22</b>
<b>Tax:</b>	<b>\$207.75</b>
<b>Credit:</b>	<b>\$0.00</b>
<b>Services Total:</b>	<b>\$2,541.97</b>
<b>Balance Due:</b>	<b>\$6,643.78</b>

Audit Exhibit #1

Page 7 of 26

Page 1 of 1

*Thank you for your business.*

# Walt's Mailing Service

Walt's Mailing Service - 9610 E 1st Ave - Spokane Valley, WA 99206-3686  
 Phone: (509) 924-5939 Fax: (509) 924-6923

2

## Invoice

**Attn:**

Committee To Elect Mike Volz  
 P.O. Box 10163  
 Spokane WA 99209

**Job Name:** Republicans PC

**Invoice #** 75986      **CustCode:** Mik005  
**Invoice Date:**  
**Date of Service:** 10/28/202      **PO#:**  
**Terms:** Prepay

Qty	Description	Unit Price	Ext Price
<b>Data Processing</b>			
15040	Read File	0.00406	\$61.10
15040	CASS / Addr. Standardize	0.00460	\$69.18
1	Matchbacks Processing	75.00000	\$75.00
15040	Dup Check	0.00410	\$61.66
8374	DSF Processing	0.00485	\$40.65
8374	Computer Presort Data	0.00170	\$14.24
8374	Computer Presort Data	0.00240	\$20.10
8374	Format Labels for IJ	5.83000	\$5.83
1	Postal Paper Work	149.54000	(\$149.54)
-1	Discount		
<b>SubTotal:</b>			<b>\$198.22</b>

**Production**

8374	Addressing	0.03000	\$251.22
8374	Mail Prep	0.00930	\$77.88
8374	Political Red Tag Mail	0.00350	\$29.31
157.70000			(\$157.70)
-1	Discount		
<b>SubTotal:</b>			<b>\$200.71</b>

**Print**

1	Print & Trim	937.00000	\$937.00
<b>SubTotal:</b>			<b>\$937.00</b>

**Postage**

Our Permit

1

1861.69	\$1,861.69
<b>Postage Paid:</b>	<b>\$0.00</b>
<b>Postage Used:</b>	<b>\$1,861.69</b>
<b>Postage Subtotal:</b>	<b>\$1,861.69</b>

**Comments:**

<b>Sub Total:</b>	<b>\$1,335.93</b>
<b>Tax:</b>	<b>\$118.90</b>
<b>Credit:</b>	<b>\$0.00</b>
<b>Services Total:</b>	<b>\$1,454.83</b>
<b>Balance Due:</b>	<b>\$3,316.52</b>

Audit Exhibit #1  
 Page 8 of 26

*Thank you for your business.*

# Walt's Mailing Service

Walt's Mailing Service - 9610 E 1st Ave - Spokane Valley, WA 99206-3686  
 Phone: (509) 924-5939 Fax: (509) 924-6923

2

## Invoice

**Attn:**  
 Committee To Elect Mike Volz  
 P.O. Box 10163  
 Spokane WA 99209

**Job Name:** Dems PC

**Invoice #** 75987      **CustCode:** Mik005  
**Invoice Date:**  
**Date of Service:** 10/28/202      **PO#:**  
**Terms:** Prepay

Qty	Description	Unit Price	Ext Price
<b>Data Processing</b>			
12455	Read File	0.00441	\$54.89
12455	CASS / Addr. Standardize	0.00460	\$57.29
1	Matchbacks Processing	75.00000	\$75.00
12455	Dup Check	0.00410	\$51.07
5212	DSF Processing	0.00485	\$25.30
5212	Computer Presort Data	0.00170	\$8.86
5212	Format Labels for IJ	0.00240	\$12.51
1	Postal Paper Work	5.83000	\$5.83
-1	Discount	0.00000	\$0.00
<b>SubTotal:</b>			<b>\$290.75</b>

<b>Production</b>			
5212	Addressing	0.03000	\$156.36
5212	Mail Prep	0.00930	\$48.47
5212	Political Red Tag Mail	0.00350	\$18.24
-1	Discount	0.00000	\$0.00
<b>SubTotal:</b>			<b>\$223.07</b>

<b>Print</b>			
1	Print & Trim	607.00000	\$607.00
<b>SubTotal:</b>			<b>\$607.00</b>

<b>Postage</b>			
Our Permit	1	1214.68	\$1,214.68
<b>Postage Paid:</b>			<b>\$0.00</b>
<b>Postage Used:</b>			<b>\$1,214.68</b>
<b>Postage Subtotal:</b>			<b>\$1,214.68</b>

**Comments:**

<b>Sub Total:</b>	<b>\$1,120.82</b>
<b>Tax:</b>	<b>\$99.75</b>
<b>Credit:</b>	<b>\$0.00</b>
<b>Services Total:</b>	<b>\$1,220.57</b>
<b>Balance Due:</b>	<b>\$2,435.25</b>

Audit Exhibit #1  
 Page 9 of 26

*Thank you for your business.*

# Walt's Mailing Service

Walt's Mailing Service - 9610 E 1st Ave - Spokane Valley, WA 99206-3686  
 Phone: (509) 924-5939 Fax: (509) 924-6923

# 3

## Invoice

**Attn:**

Committee To Elect Mike Volz  
 P.O. Box 10163  
 Spokane WA 99209

**Job Name:** General PC

**Invoice #** 75888      **CustCode:** Mik005

**Invoice Date:**

**Date of Service:** 10/16/202      **PO#:**

**Terms:** Prepay

Qty	Description	Unit Price	Ext Price
<b>Data Processing</b>			
15517	Read File	0.00401	\$62.24
15517	CASS / Addr. Standardize	0.00460	\$71.38
1	Matchbacks Processing	75.00000	\$75.00
15517	Dup Check	0.00410	\$63.62
11255	DSF Processing	0.00485	\$54.64
11255	Computer Presort Data	0.00170	\$19.13
11255	Format Labels for IJ	0.00240	\$27.01
1	Postal Paper Work	5.83000	\$5.83
-1	Discount	162.91000	(\$162.91)
<b>SubTotal:</b>			<b>\$215.94</b>

**Production**

11255	Addressing	0.03000	\$337.65
11255	Mail Prep	0.00930	\$104.67
11255	Political Red Tag Mail	0.00350	\$39.39
-1	Discount	211.95000	(\$211.95)
<b>SubTotal:</b>			<b>\$269.76</b>

# 1156

**Print**

1	Print & Trim	959.00000	\$959.00
<b>SubTotal:</b>			<b>\$959.00</b>

**Postage**

Our Permit	1	2407.86	\$2,407.86
<b>Postage Paid:</b>			<b>\$0.00</b>
<b>Postage Used:</b>			<b>\$2,407.86</b>
<b>Postage Subtotal:</b>			<b>\$2,407.86</b>

**Comments:**

<b>Sub Total:</b>	<b>\$1,444.70</b>
<b>Tax:</b>	<b>\$128.58</b>
<b>Credit:</b>	<b>\$0.00</b>
<b>Services Total:</b>	<b>\$1,573.28</b>
<b>Balance Due:</b>	<b>\$3,981.14</b>

Audit Exhibit #1  
 Page 10 of 26

*Thank you for your business.*

# Walt's Mailing Service

Walt's Mailing Service - 9610 E 1st Ave - Spokane Valley, WA 99206-3686  
 Phone: (509) 924-5939 Fax: (509) 924-6923

4

## Invoice

**Attn:**  
 Committee To Elect Mike Volz  
 P.O. Box 10163  
 Spokane WA 99209

**Job Name:** Veteran PC

**Invoice #** 75982      **CustCode:** Mik005  
**Invoice Date:**  
**Date of Service:** 10/23/202      **PO#:**  
**Terms:** Prepay

Qty	Description	Unit Price	Ext Price
<b>Data Processing</b>			
4816	Read File	0.00759	\$36.56
4816	CASS / Addr. Standardize	0.00460	\$22.15
1	Matchbacks Processing	75.00000	\$75.00
4816	Dup Check	0.00410	\$19.75
2832	DSF Processing	0.00706	\$20.00
2832	Computer Presort Data	0.00170	\$4.81
2832	Format Labels for IJ	0.00240	\$6.80
1	Postal Paper Work	5.83000	\$5.83
-1	Discount	82.09000	(\$82.09)
<b>SubTotal:</b>			<b>\$108.81</b>

### Production

2832	Addressing	0.03000	\$84.96
2832	Mail Prep	0.00930	\$26.34
2832	Political Red Tag Mail	0.00350	\$9.91
-1	Discount	50.91000	(\$50.91)
<b>SubTotal:</b>			<b>\$70.30</b>

### Print

1	Print & Trim	433.00000	\$433.00
<b>SubTotal:</b>			<b>\$433.00</b>

### Postage

Our Permit

1

659.58	\$659.58
<b>Postage Paid:</b>	<b>\$0.00</b>
<b>Postage Used:</b>	<b>\$659.58</b>
<b>Postage Subtotal:</b>	<b>\$659.58</b>

### Comments:

<b>Sub Total:</b>	<b>\$612.11</b>
<b>Tax:</b>	<b>\$54.48</b>
<b>Credit:</b>	<b>\$0.00</b>
<b>Services Total:</b>	<b>\$666.59</b>
<b>Balance Due:</b>	<b>\$1,326.17</b>

Audit Exhibit #1  
 Page 11 of 26

*Thank you for your business.*

# Walt's Mailing Service

Walt's Mailing Service - 9610 E 1st Ave - Spokane Valley, WA 99206-3686  
 Phone: (509) 924-5939 Fax: (509) 924-6923

4

## Invoice

**Attn:**

Committee To Elect Mike Volz  
 P.O. Box 10163  
 Spokane WA 99209

**Job Name:** Pro-Life PC

**Invoice #** 75983      **CustCode:** Mik005  
**Invoice Date:**  
**Date of Service:** 10/23/202      **PO#:**  
**Terms:** Prepay

Qty	Description	Unit Price	Ext Price
<b>Data Processing</b>			
5180	Read File	0.00723	\$37.43
5180	CASS / Addr. Standardize	0.00460	\$23.83
1	Matchbacks Processing	75.00000	\$75.00
5180	Dup Check	0.00410	\$21.24
3882	DSF Processing	0.00515	\$20.00
3882	Computer Presort Data	0.00170	\$6.60
3882	Format Labels for IJ	0.00240	\$9.32
1	Postal Paper Work	5.83000	\$5.83
-1	Discount	85.68000	(\$85.68)
<b>SubTotal:</b>			<b>\$113.57</b>

**Production**

3882	Addressing	0.03000	\$116.46
3882	Mail Prep	0.00930	\$36.10
3882	Political Red Tag Mail	0.00350	\$13.59
3882		73.11000	(\$73.11)
-1	Discount		
<b>SubTotal:</b>			<b>\$93.04</b>

**Print**

1	Print & Trim	452.00000	\$452.00
<b>SubTotal:</b>			<b>\$452.00</b>

**Postage**

Our Permit	1	902.36	\$902.36
<b>Postage Paid:</b>			<b>\$0.00</b>
<b>Postage Used:</b>			<b>\$902.36</b>
<b>Postage Subtotal:</b>			<b>\$902.36</b>

**Comments:**

<b>Sub Total:</b>	<b>\$658.61</b>
<b>Tax:</b>	<b>\$58.62</b>
<b>Credit:</b>	<b>\$0.00</b>
<b>Services Total:</b>	<b>\$717.23</b>
<b>Balance Due:</b>	<b>\$1,619.59</b>

Audit Exhibit #1  
 Page 12 of 26

*Thank you for your business.*

# Invoice

Date	Invoice #
10/30/2020	1604

Action Solutions  
6855 NE Arnold Avenue  
Adair Village, OR 97330

**Bill To**  
Committee to Elect Mike Volz  
Mike Volz

Item	Date	Description	# of Calls	Rate	Amount
Voter Lists	10/30/2020	Automated calls: Live Connections: 10865 VM Connections: 3290 Total Connections: 14155	14,155	0.05	707.75
Voter Lists	10/30/2020	Voter list	24,195	0.04	967.80

Audit Exhibit #1

Page 13 of 26

Please make checks payable to Action Solutions

**Total** \$1,675.55  
**Payments/Credits** \$0.00  
**Balance Due** \$1,675.55

Phone #	Fax #	E-mail	Web Site
(503) 400-6036	8108851840	dial@actionsolutions.net	www.actionsolutions.net





# RIVER MARKETING LLC

# INVOICE

DATE:	10/11/2020
INVOICE #:	201011-02
Customer ID:	VOLZ

Josh & Nichole Kerns  
2622 E Clover Park Ave  
Mead, WA 99021  
Phone: 509-435-5171

BILL TO
Committee to Elect Mike Volz PO Box 10163 Spokane, WA 99209

SHIP TO

DESCRIPTION OF SERVICES	HOURS	RATE	AMOUNT
Graphic design, list creation  <i>Expensed on 09/01/20 - 10/12/20 C4  No check sent * payment included w/ Revised 201027-01</i>	5	75.00	375.00
SUBTOTAL			\$375.00
OTHER			
OTHER			
TOTAL			\$375.00

**OTHER COMMENTS**

None

**Please make checks payable to:  
River Marketing, LLC**

Payment due in 30 days. Please include invoice number on check.  
If you have any questions about this invoice, please contact Nichole Kerns: 509-435-5171

**Thank you for your business!**

COMMITTEE TO ELECT MIKE VOLZ  
P O BOX 10163  
SPOKANE, WA 99209-1163

28-8270/3251

1161

DATE 11/17/2020

PAY TO THE ORDER OF Action Solutions \$ 1675.00  
One Thousand Six hundred Seventy Five 00/100 DOLLARS

stcu Spokane Teachers Credit Union  
Post Office Box 1954  
Spokane, WA 99210-1954

*Mike Volz*

MEMO

[Redacted]

01161

Spokane Teachers Credit Union  
Post Office Box 1954  
Spokane, WA 99210-1954  
Member Since 11/17/2020  
Account Number 1161  
Routing Number 091000017

CHECK HERE FOR DEPOSIT OR REMIT DEPOSIT ONLY  
DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE

For Deposit  
153663497953

COMMITTEE TO ELECT MIKE VOLZ  
P O BOX 10163  
SPOKANE, WA 99209-1163

28-8270/3251

1160

DATE 10/31/20

PAY TO THE ORDER OF River Marketing \$ 1557.50  
One thousand five hundred fifty seven 50/100 DOLLARS

stcu Spokane Teachers Credit Union  
Post Office Box 1954  
Spokane, WA 99210-1954

*Mike Volz*

MEMO

[Redacted]

01160



COMMITTEE TO ELECT MIKE VOLZ  
P O BOX 10163  
SPOKANE, WA 99209-1163

28-8270/3251

1159

DATE 10/28/2020

PAY TO THE ORDER OF SUE U

\$11,005.00

Eleven Thousand Five

DOLLARS

stcu Spokane Teachers Credit Union  
Post Office Box 1954  
Spokane, WA 99210-1954

Mike Volz

MEMO

[Redacted]

[Redacted]

01159

13250480007300 10-29-2020

State Bank Northwest  
Spokane Valley, WA  
>125101651<

Spokane Valley  
Q W M... DSN... 2021

COMMITTEE TO ELECT MIKE VOLZ  
P O BOX 10163  
SPOKANE, WA 99209-1163

28-8270/3251

1157

DATE 10/26/20

PAY TO THE ORDER OF Walt's Mailing

\$2945.76

Two thousand nine hundred forty-five

DOLLARS

stcu Spokane Teachers Credit Union  
Post Office Box 1954  
Spokane, WA 99210-1954

MEMO

[Redacted]

[Redacted]

01157





COMMITTEE TO ELECT MIKE VOLZ  
P.O BOX 10163  
SPOKANE, WA 99209-1163

28-8270/3251

1154

DATE 10/9/20

PAY TO THE ORDER OF CUE II \$ 12,123.00  
Twelve Thousand One Hundred Twenty Three

**stcu** Spokane Teachers Credit Union  
Post Office Box 1954  
Spokane, WA 99210-1954

*Mike Volz*

MEMO  
[Redacted]

01154

25867020018300 10-13-2020  
State Bank Northwest  
Spokane Valley, WA  
>125101651<

*Spokane Valley  
The Washington Falls*

COMMITTEE TO ELECT MIKE VOLZ  
P.O BOX 10163  
SPOKANE, WA 99209-1163

28-8270/3251

1153

DATE 10/8/20

PAY TO THE ORDER OF Walt's Mailing \$ 6,164.38  
Six Thousand Six Hundred Forty Three + 38/100

**stcu** Spokane Teachers Credit Union  
Post Office Box 1954  
Spokane, WA 99210-1954

*Mike Volz*

MEMO  
[Redacted]

01153

ENDORSE HERE  
 PAY TO THE ORDER OF  
 WASHINGTON TRUST BANK  
 SPOKANE, WA 99204-1440  
 1504-1009  
 FOR DEPOSIT ONLY  
 WHAT THE MAIL BOX IS TO YOUR CHECK  
 CHECK HERE FOR MOBILE OR REMOTE DEPOSIT ONLY

AT \_\_\_\_\_ NAME OF FINANCIAL INSTITUTION \_\_\_\_\_ DATE \_\_\_\_\_  
 DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE  
 RESERVED FOR FINANCIAL INSTITUTION USE \*

\*125100089 < 20201009  
 Washington Trust Bank  
 Drawer # 100905/0168  
 PIN: 758710440000579

125100089 < 905 168 10/09/20

Results of document attention:  
 \* The document is a check.  
 \* The document is dated 10/09/20.  
 \* The document is for the amount of \$14,899.19.  
 \* The document is payable to the order of CUE II.  
 \* The document is signed by Mike Volz.  
 \* The document is stamped with the date 7/20/20.  
 \* The document is stamped with the amount \$14,899.19.  
 \* The document is stamped with the amount FOURTEEN THOUSAND EIGHT HUNDRED NINETY-NINE AND 7/100 DOLLARS.  
 \* The document is stamped with the amount 1152.  
 \* The document is stamped with the amount 01152.  
 \* The document is stamped with the amount 25865500005500 07-22-2020.  
 \* The document is stamped with the amount State Bank Northwest.  
 \* The document is stamped with the amount Spokane Valley, WA.  
 \* The document is stamped with the amount >125101651<.

COMMITTEE TO ELECT MIKE VOLZ  
 P O BOX 10163  
 SPOKANE, WA 99219-1163

20-0271/3251  
 1152

DATE 7/20/20

PAY TO THE ORDER OF CUE II \$ 14,899.19

FOURTEEN THOUSAND EIGHT HUNDRED NINETY-NINE AND 7/100 DOLLARS

stcu Spokane Teachers Credit Union  
 Post Office Box 1954  
 Spokane, WA 99210-1954

MEMO  
 [Redacted] [Redacted] 01152

Mike Volz

25865500005500 07-22-2020  
 State Bank Northwest  
 Spokane Valley, WA  
 >125101651<

Paul Chubb  
 FOR CUE II



## State of Washington

### PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908

(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)

May 14, 2021

Sent Electronically to Representative Mike Volz

Subject: PDC Audit Letter, 2020 Mike Volz for State Representative Campaign; PDC Audit No. 20-15

Dear Representative Volz:

This letter is a follow-up to the email PDC staff sent to inform you the 2020 Mike Volz for State Representative Campaign had been selected for audit and that you would be receiving an email with this attached letter from staff concerning the audit. Pursuant to RCW 42.17A.105 and .110, the Public Disclosure Commission (PDC) has a mandate to conduct audits of candidates, committees, and other filing entities. Based on that authority, PDC staff has in the past conducted audits of candidates and political committees, lobbyists and lobbyist employers, and state agency lobbying activities in accordance with chapter 42.17 RCW. The PDC began conducting several limited-scope audits the first of December 2020.

Audits provide the PDC with an opportunity to: (1) determine the degree of compliance with the candidate campaign finance reporting requirements; (2) enhance and strengthen the public's confidence in the campaign contribution and expenditure information being disclosed by filers; (3) identify problem areas in reporting campaign activities that suggest a need to revise PDC advice being given or the information that is listed in candidate instructions on the PDC website and included in our online manuals; and (4) identify needed changes in the law or rules for reporting.

PDC staff previously identified four 2018 Legislative Districts elections for State Senate, which comprised the initial audit pool of eight candidates selected for limited-scope audits. The eight 2018 Senate candidate audits have been completed, and staff is applying the same criteria in selecting the 2020 House of Representative candidates for audit. The criteria used for the 2020 State Representative candidates included both candidates appearing on the November 3, 2020 general election ballot, in a contested election, with significant contribution and expenditure activities.

Based on the criteria listed above, the 2020 State Representative race in the 6<sup>th</sup> Legislative District, Position #1 was selected for a limited-scope audit. For your information, most of the audit work will involve PDC staff reviewing information disclosed on C-3 reports and C-4 reports that were filed electronically by each campaign. Staff will confirm and verify select contributor and vendor expenditure information, and be requesting documentation from both Campaigns, including copies of campaign books of account maintained by the Campaign for the specific expenditures listed below.

Audit Exhibit #1

Page 24 of 26

The requested documentation includes copies of invoices, receipts, cancelled checks, emails and other memoranda for the following 2020 Campaign expenditures:

- Seven expenditures were made by the Campaign to Cue 11 totaling \$34,956.79 that included: (1) a \$10,123 expenditure made on October 9, 2020, for a “Media Buy: KXLY 89, IHeart 206”; (2) a \$10,005 expenditure made on October 27, 2020, for a “Comcast Ad Buy”; (3) a \$5,000 expenditure made on October 9, 2020, for a “Media buy TBD”; (4) a \$3,142 expenditure made on July 22, 2020, for “KISC #58”; (5) a \$2,652.79 expenditure made on July 22, 2020, for “Production and Edits of DOER, BIO, GOTV”; (6) a \$2,034 expenditure made on July 22, 2020, for “KQNT/KIX #51”; and (7) a \$2,000 expenditure made on October 9, 2020, for “Studio Edit Mix.”
- Eight expenditures were made to Walt’s Mailing totaling \$19,322.45 that included: (1) two expenditures made on October 8, 2020, totaling \$6,643.78 for invoice “#21278”; (2) two expenditures made on November 2, 2020, totaling \$5,751.77 for printing and postage for invoice “#27495”; (3) two expenditures made on October 16, 2020, totaling \$3,981.14 for invoice “#15517”; and (4) two expenditures made on October 23, 2020, totaling \$2,945.76 for invoices “#2832 and #3882.”
- A \$1,675.55 expenditure made on November 17, 2020, to Action Solutions for “Robocalls 14155.”
- A \$1,162.50 expenditure made on November 1, 2020, to River Marketing for “Design and layout.”

Staff is also requesting that each Campaign provide a response concerning 2020 general campaign practices, internal campaign compliance controls, and procedures for processing and recording contribution and expenditure activities, including orders placed and in-kind contributions. The questions and Campaign practices for which a response is being requested, includes the following:

1. Explain the 2020 Campaign contribution process from receipt of a contribution, to entering the contributor information into ORCA, the name of the person depositing the contributions, how often contributions were deposited, and the filing of the C-3 report. In addition, if online contributions were received by the Campaign, please explain how those contributions were processed as well.
2. Explain the 2020 Campaign expenditure process including the placing of the orders for political advertisements, identifying who placed the orders, to making the expenditure, picking up the goods and/or services provided, and the disclosing of the expenditure on the C-4 report. In addition, explain the process for disclosing orders placed.
3. Describe the process for reviewing and filing the C-3 and C-4 reports, as well as the communication that occurs between the candidate and the Treasurer concerning the contribution and expenditure information being disclosed. In addition, does the candidate review the reports either before or after they have been filed?
4. Describe how the Campaign records are maintained for all contribution and expenditure activities, and what those records include.
5. Who was responsible for the Campaign records, did the Campaign make the books of account available during the public inspection period, was an inspection requested, and what documents were made available during the inspection?

6. Did the candidate or any Campaign officers or volunteers received reimbursements during the 2020? If yes, please describe how the Campaign handled the reimbursements, the documentation that was required for reimbursement, and how those records were maintained.

Please provide copies of the requested expenditure documentation, and a response to the PDC questions and issues regarding the various campaign practices, no later than **May 28, 2021**. If you need additional time, please do not hesitate to contact Kurt Young, PDC Compliance Officer.

PDC staff understand the numerous constraints placed upon individuals who run for public office as candidates and elected officials. Staff also appreciates the hard work, time, effort, and diligence on the part of all those individuals involved, including campaign workers, volunteers, and in particular the campaign treasurers. The PDC appreciates your cooperation in conducting this audit.

If you have any questions, please contact Mr. Young at (360) 664-8854, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by,

/s \_\_\_\_\_  
Electronically Signed Kurt Young  
Compliance Officer

/s \_\_\_\_\_  
Electronically Signed BG Sandahl, Deputy Director for  
Peter Lavalley, PDC Executive Director



1. The PO Box was generally checked 2 or 3 times week, but at least once. Deposits were generally made on Friday for week and data was entered Orca over the weekend for reporting. Online payments that were received via PayPal and were recorded and transferred when received. Transactions cost were recorded separately.
2. I would coordinate with CUE 11 giving them parameters and budget limits. CUE 11 would place the ads. Once an invoice was received for ad purchase and services, I would record in Orca and pay the bill.
3. I review, reconcile, and submit all reports. C4 reports are balanced to the bank balance noting any in-transit or pending items.
4. I maintain the campaign records in a file box at my house.
5. I am responsible for maintain records. The records were made available but there were no inspection requests.
6. I received two reimbursements: 1) \$240 for a fundraiser at Post Street Ale House in December of 2019; and 2) \$134 for PO Box rental fees. I treated them as normal expenses and maintained records as normal.