



State of Washington  
PUBLIC DISCLOSURE COMMISSION

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July 28, 2021

Sent Electronically to William Bruch and Bruce Ayers

Subject: William Bruch 2020 for State Representative Campaign – PDC Audit No. 20-14

Dear Mr. Bruch and Mr. Ayers:

This letter is to inform you that the Public Disclosure Commission (PDC) staff has completed the limited-scope audit of the 2020 William Bruch 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. 20-14

2020 Friends of William Bruch 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 October 28, 2019, William Bruch filed a Candidate Registration (C-1 report) declaring his candidacy for election to the office of State Representative, Position 2, in the 10th Legislative District in 2020, selecting the Full Reporting Option and listing Bruce Ayers as Treasurer.
- On May 3, 2021, the PDC staff sent an email to William Bruch and Bruce Ayers, Treasurer for the 2020 Friends of Bill Bruch Campaign for State Representative, and attached a letter notifying them 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 10<sup>th</sup> Legislative District, Position 2, which included William 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 Friends of Bill Bruch Campaign for State Representative (Campaign) disclosed \$374,816.11 in total contributions received and \$366,582.03 in total expenditures made during the 2020 election cycle, with \$8,234.08 as cash on hand balance through December 31, 2020 on the “Final C-4 report” timely filed on January 10, 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, 2018 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 May 31, 2019 through November 3, 2020, that included 566 separate monetary and in-kind contributions totaling \$374,816.11. The \$374,816.11 in total monetary and in-kind contributions received included in anonymous contributions as disclosed on C-3 reports.
- The Campaign’s four largest contributors in 2020 included the following political party and caucus political committees:
  1. Washington State Republican Party (WSRP): A total of \$103,149.96 was received from WSRP between July and October 2020, comprising \$88,649.96 in in-kind contributions and one cash contribution of \$14,500 was received on October 19, 2020.
  2. House Republican Organizational Committee (HROC): A total of \$96,000 in cash contribution was received from HROC between March 9 and October 8, 2020.
  3. Skagit County Republican Party (SCRCP): A total of \$46,175 in contribution was received from SCRCP, comprising \$31,275 in cash and \$14,900 in in-kind contribution received on October 8, 2020.
  4. Senate Republican Campaign Committee (SRCC): A total of \$20,000 was received from the SRCC on October 7, 2020.
- The Campaign disclosed receiving anonymous contributions totaling \$100 in the 2020 election cycle. This was a lumpsum contribution received on August 25, 2020. The statutory anonymous contribution limit is \$300 or one percent of the total contributions received in a calendar year, whichever is greater.

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- 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 C-3 report accelerated 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>
10/30/2019	10/30/2019	Five total contributions received from four individuals and one PAC.	\$3,882.00	11/04/2019	0
11/18/19 – 11/20/19	11/25/2019	Three-page C-3 report depicting 23 itemized contributions from individuals ranging from \$50 to \$1,000 and \$115 in small contributions of \$25 or less not itemized.	\$5,815.00	11/25/2019	0
12/4/20 – 12/5/2019	12/6/2019	Five total contributions received from four individuals and one PAC.	\$2,800.00	12/6/2019	0
12/30/2019	12/30/2019	Four contributions from two individuals and two entities.	\$1,200.00	12/30/2019	0
1/21/2020	1/21/2020	Three itemized contributions from individuals.	\$2,030.00	1/22/2020	0
2/10/2020	2/11/2020	Four-page C-3 report depicting 38 itemized contributions rec'd from individuals and entities ranging from \$15 to \$1,000.	\$4,335.00	2/11/2020	0
02/12/2020	2/12/2020	Four contributions received from four individuals ranging from \$50 to \$500.	\$1,050.00	2/12/2020	0
3/2/20 -3/9/20	3/9/2020	Two-page C-3 report depicting contributions received from one caucus committee and five individuals ranging from \$25 to \$5,000.	\$6,051.70	3/9/2020	2
4/24/20 – 4/27/20	4/27/2020	Two contributions received from two entities and two individuals ranging from \$26.70 to \$1,000.	\$2,061.70	4/27/2020	0
5/4/20 – 5/8/2020	5/11/2020	One-page C-3 report depicting four contributions received from two individuals and two entities ranging from \$100 to \$1,000.	\$2,225.00	5/11/2020	2
5/7/2020	5/11/2020	One-page C-3 report depicting one contribution from a PAC.	\$1,500.00	5/11/2020	0
6/1/20 – 6/4/2020	8/7/2020	One-page C-3 report depicting five itemized contributions from three individuals, one entity and one PAC.	\$1,719.08	6/4/2020	0

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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>
6/5/2020	6/7/2020	One-page C-3 report depicting contributions received from ten two individuals for \$1,000 each.	\$2,000.00	6/7/2020	0
6/24/20 – 6/26/2020	6/29/2020	Two-page C-3 report depicting contributions from seven individuals ranging from \$37.17 to \$500.	\$1,045.94	6/29/2020	0
7/1/2020	7/1/2020	Two-page C-3 report depicting eight contributions from individuals and one PAC ranging from \$50 to \$5,000.	\$5,285.00	7/1/2020	0
7/6/2020	7/6/2020	One-page C-3 report depicting contributions received from one individual and one PAC.	\$3,850.00	7/6/2020	0
7/20/20 – 7/22/2020	7/22/2020	One-page C-3 report depicting four itemized contributions received from one individual, two entities and one PAC.	\$4,076.00	7/22/2020	0
7/25/20 – 7/27/2020	7/27/2020	One-page C-3 report depicting three contributions from one individual ranging from \$100 to \$1,000.	\$1,205.24	7/27/2020	0
7/28/20 – 7/29/2020	7/29/2020	Two-page C-3 report depicting six total contributions from five individuals and one entity ranging from \$50 to \$500.	\$1,050.00	7/29/2020	0
8/4/2020	8/4/2020	One-page C-3 report depicting two separate contributions from one/same individual for Primary and General elections.	\$2,000.00	8/4/2020	0
8/17/20 – 8/19/2020	8/19/2020	Two-page C-3 report depicting eight total contributions from eight individuals and one entity ranging from \$50 to \$1,000.	\$4,012.30	8/19/2020	0
8/24/20 – 8/25/2020	8/31/2020	One-page C-3 report depicting five total contributions from two PACs and three individuals ranging from \$50 to \$2,000.	\$3,130.00	8/31/2020	2
8/31/20 – 9/10/2020	9/10/2020	Two-page C-3 report depicting 16 total contributions from ten individuals, five entities and one PAC ranging from \$25 to \$5,000.	\$12,676.08	9/10/2020	5
9/8/20 – 9/10/2020	9/10/2020	Four-page C-3 report depicting 31 total contributions from individuals ranging from \$10 to \$250, including \$333 in small contributions \$25 or less not itemized.	\$2,373.00	9/10/2020	0

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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>
9/11/20 – 9/14/2020	9/14/2020	Four-page C-3 report depicting a total of thirty-three contributions – thirty-two from individuals and one from an entity, including \$55 in small contributions \$25 or less not itemized.	\$3,939.95	9/14/2020	0
9/14/20 – 9/18/2020	9/18/2020	Two-page C-3 report depicting seven total contributions from individuals, an entity and PAC ranging from \$52.62 to \$2,500.	\$4,210.48	9/18/2020	0
9/16/20 – 9/21/2020	9/21/2020	Two-page C-3 report depicting eleven total contributions from individuals, entity, PACs and a Caucus Committee ranging from \$25 to \$14,000; \$100 in anonymous contribution and \$5 in small contributions \$25 or less not itemized.	\$21,357.88	9/21/2020	0
9/24/20 – 9/30/2020	9/30/2020	Two-page C-3 report depicting thirteen total contributions from individuals, entities and PACs ranging from \$13 to \$1,000, including \$13 in small contributions \$25 or less not itemized.	\$6,025.08	9/30/2020	0
10/1/20 – 10/3/2020	10/03/2020	Two-page C-3 report depicting ten total contributions from individuals and entities, including a \$10 in small contributions \$25 or less not itemized.	\$2,396.00	10/3/2020	0
10/5/2020	10/5/2020	Two-page C-3 report depicting six total contributions from individuals and entities ranging from \$25 to \$1,000.	\$5,025.00	10/5/2020	0
10/7/20 – 10/8/2020	10/8/2020	Two-page C-3 report depicting six total contributions from two caucus committees and four individuals ranging from \$25 to \$72,000.	\$92,125.00	10/8/2020	0
10/9/20 – 10/12/2020	10/12/2020	One-page C-3 report depicting four total contributions from three entities/PACs and one individual ranging from \$500 to \$1,000.	\$3,226.70	10/12/2020	0
10/15/2020	10/15/2020	Two-page C-3 report depicting seven contributions from six individuals and one PAC, including \$25 in small	\$1,135.00	10/15/2020	0

Date Received	Date Deposited	# of contributors and description	Total C-3 Amount	C-3 Filing Date	Days Late
		contributions \$25 or less not itemized.			
10/19/2020	10/19/2020	Two-page C-3 report depicting a total of ten contributions received. Six from individuals and the remaining two from a state political party and entity, including a \$55 in small contributions \$25 or less not itemized.	\$16,913.12	10/19/2020	0
10/21/20 – 10/26/20	10/26/2020	Two-page C-3 report depicting a total of nine contributions received. Eight from individuals and one from an entity, including \$55 in small contributions \$25 or less not itemized from three individuals.	\$2,117.83	10/26/2020	0
10/29/20 - 11/2/2020	11/2/2020	One-page C-3 report depicting five total contributions received from individuals ranging from \$25 to \$100, including \$50 in small contributions \$25 or less not itemized from two individuals.	\$350.00	11/2/2020	0
<b>Totals</b>			<b>\$236,195.08</b>		

- PDC staff reviewed the 36 C-3 reports filed by the Campaign and listed in the table above totaling \$236,195.08 which represented about 63 percent of the \$374,816.11 in total contributions received during the 2020 election cycle. As noted in the table above, the Campaign timely filed 32 out of the 36 C-3 reports reviewed by staff as part of this audit, with the other four filed 2-5 days late.
- 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 183 individuals who contributed more than \$100 to the Campaign, totaling \$49,638.31 in contributions received.

- Of the 183 individuals who disclosed their Employer and Occupation information, 104 listed their Occupation as being “Retired.” Those 104 retirees contributed a total of \$20,081.62 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>
9/21/2020	ABC PAC-WA	\$1,000	9/21/2020	9/16/2020	C-4 report
6/1/2020	Associated General Contractor	\$1,000	6/4/2020	8/27/2020	C-4 report
9/17/2020	Broadband Communications	\$1,000	9/18/2020	9/15/2020	C-4 report
10/25/2020	Developing A Robust Economy	\$1,000	10/26/2020	10/21/2020	C-4 report
9/14/2020	NFIB Washington PAC	\$1000	9/14/2020	9/10/2020	C-4 report
5/8/2020	Puget Sound Chapter – NECA PAC	\$1,000	5/11/2020	5/4/2020	C-3 report
9/29/2020	Trucking Action Committee PAC	\$1,000	9/30/2020	9/24/2020	C-4 report
10/9/2020	Washington Affordable Housing	\$1,000	10/12/2020	10/7/2020	C-4 report
9/21/2020	Washington Association of Realtors	\$1,000	9/21/2020	9/16/2020	C-4 report
8/31/2020	Washington Food Industry	\$1,000	9/10/2020	8/26/2020	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 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 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
May 2020 C-4 report	6/10/2020	6/07/2020	\$4,572.90	\$3,153.66	\$527.66 for Candidate Filing Fee; \$1,159.00 to Republican Signs for Campaign Signs; \$250 to Axiom Strategies LLC., for Professional Consulting Services; \$250 to WA State Republican for GOTV – Phone Banking Services; \$103.50 for Web Services; \$250 to Fourth Corner NP for Campaign Mailing List; and \$600 to Ayers Consulting for Treasury Services. Charge.	0

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C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2020 21-Day Pre Primary C-4 report	7/14/2020	7/14/2020	\$27,770.88	\$14,980.05	\$1,799.58 to Lithtex NW for Remit Envelopes, Letters, Donation Envelopes and Letters and Postage; \$1,052.80 to Dave’s Campaign Business for Envelopes, Doorbell, Shipping and Tax; \$2,995.30 to WSNRG for Doorbelling Services; \$425 to Sound Publishing, Inc for Whidbey News Times 4x4 Ad and Color fee; \$259.80 to Skagit Publishing for 4x4 Newspaper Ad plus tax; \$130.78 to Axiom Strategies LLC for Meeting with Candidate; \$123.04 to Office Depot for Stamps and Paper; and \$600 to Ayers Consulting for Treasury Services.	0
2020 7-Day Pre Primary C-4 report	7/28/2020	7/28/2020 Initial report filed timely.	\$6,923.52	\$27,138.37	Four separate expenditures totaling \$19,386 to Axiom Strategies LLC for Direct Mail Pieces, Direct Mailers, Direct Mail Postage and Direct Mailer Printing and Handling; \$2,225 to WSNRG for Doorbelling Services; \$290.40 to Sound Publishing , Inc for 4x4 inch Ad in Weekly Paper; \$1,717.20 to Skagit Publishing for Six – 4x3 Ads in the Skagit Herald and Stanwood News; \$850 to Sound Publishing, Inc for Two weeks of 4x4 Ads; \$750 to Whidbey Weekly & Printing for Three Weeks Quarter Page Ad; \$930 to Austin Cooper for Donor List Matching; and \$504 to LA Connor Weekly	0

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C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
					News for Three Weeks Quarter Page Ad.	
2020 Post-Primary C-4 report	9/10/2020	9/05/2020	\$22,390.06	\$10,679.29	\$2,105.10 to Lithtex NW for Fundraising Letters and Postage. \$6,352 to Washington State Republicans for Direct Mail Printing and Postage Piece; \$1,000 to WESPEAK.COM for Studio Time and Technician Mixing Services; \$600 to Ayers Consulting LLC for Treasury Services; \$225 to Whidbey Weekly & Printing for Printing 750 Fundraising Letters.	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	10/13/2020	\$204,507.87	\$186,391.06	\$96,172 to AX Media LLC for Cable TV and Radio Buys; \$21,196.55 to Lithtex NW for Postage for Mailer, Printing & Mail Prep, and Fundraising Letters; \$5,950.40 to Skagit Publishing for Post it and Print Ads; \$8,166 to WSNRG for Door Belling Services with Literature Drops; \$4,826 to PRAISE 106.5 for Radio Ads for September-October; \$3,000 to Whidbey Weekly & Printing for Newspaper Production and Ad and Post it not Ads; \$1,700 to Sound Publishing Inc., for Two Weekly Ads; and \$300 to Ayers Consulting LLC for Treasury Services.	0

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C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2020 7-Day Pre-General C-4 report	10/27/2020	10/27/2020	\$69,276.83	\$97,924.93	\$27,536.05 to AX Media, LLC for Cable Buy and Consultant Mileage and Ferry Expense for Meeting; \$10,000 to The Prosper Group for Online Advertising Creative and Advertising; \$6,000 to Epicenter Films LLC for Video Production Services; \$3,500 to Cannon Research Group LLC for Opposition and Vulnerability Research; \$695 to James Marketing, Inc for Ad in Hometown Values Savings Magazine; \$495 to Sound Publishing, Inc for Newspaper Ads October Editions; and \$250 to Whidbey Weekly and Printing for Ad ¼ Page – 10/15.	0

C-4 Report	Date Due	Date Filed	Contributions Received	Expenditures Made	Expenditure details	Days Late
2020 Post General election C-4 report	12/10/2020	12/10/2020	\$350.00	\$15,796.69	\$10,000 to Vanguard for Ballot Rehab Services (rejected ballots in three counties); \$1,952 to Bill Bruch for Loan Repayment; \$1,800.16 to Dave's Campaign Business for 4x9 Custom Printing – 10K Missing Invoice and 2000 Envelopes and Color Copies – Missing/Late Invoice; \$451.83 to Axiom Strategies LLC for Commercial Shoot and Meals for Film Crew; \$764 to Curtis Dart for Video Editing and \$300 to Ayers Consulting LLC for Treasury Services.	0

- The Campaign disclosed orders placed, debts and/or obligations on five of the six C-4 reports filed during the accelerated period in the 2020 election cycle.
- 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 three expenditures to AX Media LLC, totaling \$123,547.00 for expenditures that included services for cable and radio buys, cable buy and comcast tv as detailed below:
    - One expenditure on September 28, 2020, totaling \$41,424.00 for Cable TV and Radio Buys.
    - One expenditure on October 9, 2020, totaling \$54,748.00 for Comcast TV Buys.
    - One expenditure on October 21, 2020, totaling \$27,375.00 for Cable Buy. d Extras.
  2. The Campaign made ten expenditures to Lithtex NW totaling \$25,613.89 for expenditures that included services for postage for mailer, printing, fundraising letters and postage, mail prep, and donation envelopes e and radio buys, cable buy and comcast tv as detailed below:
    - Six expenditures totaling \$9,734.63 for Printing Donation Envelopes and Remit Envelopes, Printing Fundraising Letters, Mail Prep, Donation Envelopes, Letters and Postage.
    - Two expenditures totaling \$2,574.26 for Postage 1866 Fundraising Letters and 1750 Fundraising Letters and Postage.
    - Two expenditures totaling \$13,305 for Postage for Mailer and Yard Signs.

3. The Campaign made 11 expenditures to Axiom Strategies LLC., totaling \$20,610.15 for expenditures that included services for direct mail and mail pieces, direct mailer printing, handling and postage, strategy meeting time and expense, mileage, meeting with candidate and professional consulting services as detailed below:
  - Four expenditures totaling \$19,386 for Direct Mailers, Direct Mail Pieces, Direct Mailer Printing, Postage and Handling.
  - Seven expenditures totaling \$1,224.15 for Meeting with Candidate, Professional Consulting Services, Consultant Mileage and Ferry Expense for Meeting, Mileage for Attendance at Kickoff, Strategy Meeting Time and Expense, Expenses for Commercial Shoot and Meals for the Film Crew.
  - One expenditure on October 21, 2020, totaling \$27,375.00 for Cable Buy. d Extras.
- 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 May 25, 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. Two expenditures were made by the Campaign to AX Media, LLC totaling \$96,172.00 during the 2020 election, that included the following expenditures:
  - A \$54,748 expenditure made on October 9, 2020, for Comcast TV ad buy – totaling \$10,320 (10/13 to 10/26); a Radio buy totaling \$44,428 (10/13 to 10/26); and a \$41,424 expenditure made on September 28, 2020, for “Cable TV and Radio buys.”
    - The documentation provided by the Campaign included a copy of a \$54,748 electronic wire transfer receipt written payable to *AX Media.*, for invoice number 1201 (dated 10/6/2020) for “Cable Buy (10/13-10/26) - \$10,320 and Radio Buy (10/13-10/26) - \$44,428.00.”
2. Four expenditures totaling \$19,386 made to Axiom Strategies, LLC on July 21 and 23, 2020 to print and mail 16,595 direct mail pieces.
  - The documentation provided by the Campaign included a copy of a \$25,000 check (#388) dated 10/14/2020 written payable to *Alpha Media* for “Digital Advertising” on YouTube (10,000 Impressions), Connected TV (25,000

Impressions) and Mobile 2 Social (1,119,444 Impressions, and a second check for \$5,000 (check# 393) and written payable to *Alpha Media* for “Digital Advertising.”

3. Two expenditures totaling \$19,121.54 made to Lithtex NW on October 9, 2020 that included a \$13,118.04 expenditure made for “73K Postage for Mailer;” and a \$6,003.50 expenditure for “78K Printing, Mail Prep and Sales Tax.”
  - The documentation provided by the Campaign included a copy of a \$19,121.54 check (#191) written on 10/9/2020 payable to *Lithtex NW Printing Solutions* for invoice # 91867, dated October 9, 2020 – for Bio Postcard Mailer (78,000), Mail prep and postage.
4. A \$10,000 expenditure made on October 21, 2020, to The Prosper Group for “Online Advertising: Creative \$1,000 and Advertising \$9,000.”
  - The documentation provided by the Campaign included a copy of the invoice (# 11608) for “Online Advertising: Ad Creative and Online Advertising: Advertising,” and proof of payment to the Prosper Group for \$10,000.
5. Two expenditures totaling \$7,667 made to the Skagit Publishing that included a \$5,950.40 expenditure made on September 30, 2020, for “Post it and Print Ads;” and a \$1,717 expenditure made on July 15, 2020, for “64 x 3 Skagit Herald and Stanwood News” advertisements.
  - The documentation provided by the Campaign included a copy of (a) invoice# 374044 for *Post-its, Skagit Valley Herald (\$2,133.00); 4x3 Print ads, Skagit Valley Herald (\$2,377.20); Post-its, Stanwood/Camano News (\$401.00) and 4/3 Print ads, Skagit Valley Herald (\$2,377.20), Stanwood /Camano News (\$1,039.20)*, including proof of electronic payment to Skagit Publishing, LLC for \$5,950.40 on September 30, 2020; and (b) proof of \$1,717.20 payment on July 15, 2020 for *Skagit Valley Herald Thursday ads, 4x3, 7/23 & 7/30 (\$290.40); Skagit Valley Herald Sunday ads, 4x3, 7/26 & 8/2 (\$308.40) and Stanwood/Camano News ads, 4x3, 7/21 & 7/28 (259.80):*
6. A \$3,000 expenditure made on September 30, 2020, to Whidbey Weekly and Printing for “Newspaper production, ad and Post it Note ads.”
  - The documentation provided by the Campaign included a copy/proof of electronic payment (\$3,000) made to Whidbey Weekly LLC for “Newspaper Production and Post it Note ads” for invoice # 11989.
7. A \$1,700 expenditure made on September 25, 2020, to Sound Publishing, Inc. for “Two weekly ads.”
  - The documentation provided by the Campaign included a copy/proof of electronic payment in the amount of \$1,700 paid to Sound Publishing for two *Whidbey News Times ad* paid on 9/25/2020.

### **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 May 25, 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, contributions were received using campaign donation envelopes from the donor to the candidate (Bill Bruch) or by USPS mail to the campaign mailbox. The campaign envelopes had "a pre-printed form that requested the needed PDC information for each donation. This according to the campaign included the over \$100 dollar donation line for occupation, employer, city and state information. The candidate also provided to donors the "not a foreign entity" declaration as needed. The campaign treasurer would call or email the business donors the "not a foreign entity" form if business donations were received in the mail.

The candidate would check the campaign mailbox "every couple of days for donations and take a picture of any donations received (and envelope, if needed) and deposit the donation in the bank usually two to three times a week depending on the number of donations received." The candidate would then text or email the pictures of the donation checks received and deposited to the bank to the campaign treasurer the same day the candidate deposited them into the bank.

The Campaign further stated that the "campaign received online donations using Anedot credit card processing services." The online contribution form also included the necessary donor donation information for address, occupation and employer for donation over \$100. The online donation form also included the "not a foreign entity" form for donation from non-individual donors (businesses). The campaign treasurer and candidate would receive "an individual email from Anedot daily for every donation made online with the date and amount of the donation. Contributions from Anedot would normally take "3 to 5 business days to transfer the net contribution(s) to the campaign bank account." Depending on the number of donations, the treasurer would "post daily to ORCA and file the required C3 report(s) the following Monday following the bank deposit or transfer of funds to the campaign bank account." The campaign further stated that any last-minute donations were filed with the PDC the next day in accordance with PDC specifications.

##### Campaign Expenditures:

All campaign expenditures were ordered and approved by the candidate himself. The candidate consulted with the campaign consultant (Axiom Strategies) for most of the campaign advertising and mailing expenses. The campaign consultant (Axiom Strategies) would coordinate, prepare and execute direct mail, social media, radio and TV advertising. The candidate would approve all expenses and direct mail pieces. When it comes to radio advertising, the campaign stated the candidate would order directly and pay by credit card.

The campaign further stated that “Whenever possible it was standard practice to pay for campaign expenses using the campaign’s debit card. Only the candidate or the treasurer had access to a campaign bank account debit card.” The candidate would write checks for campaign expenses when it was more convenient, or the campaign received a discount for checks versus using a debit card. According to the campaign, the candidate would take a picture of any checks written or receipts received for campaign expenses and “text or email the expenditure receipts or order to the treasurer.” The candidate would then approve the invoice and the campaign treasurer would post to ORCA and pay Axiom Strategies and other expenses either online or using ‘bill pay’ services provided by the campaigns bank.

All expenses would be posted to ORCA daily or weekly by the campaign treasurer. Before submitting the required C4 the treasurer would reconcile all expenditures to the bank account to account for the expenses during the C4 period before filing the C4 with the PDC.

#### Contribution and Expenditure Reports:

The Campaign’s ORCA bookkeeping was done by the treasurer. This included uploading all the C-3 and C-4 reports onto ORCA. According to the Campaign, the treasurer would post to ORCA daily and weekly. The candidate would automatically receive an email from the PDC every time a C3 and C4 was uploaded. The candidate did not approve the C3 or C4 before the treasurer uploaded them. The candidate did not have access to the ORCA software because only one user at a time can post and file reports in the current version of ORCA without doing full backups and restoring procedures.

The treasurer maintained and kept notebook binders in chronological order, by C-4 period and Excel spreadsheets for contributions, expenses and the checkbook. Before sending the C-4s to the PDC, the Campaign treasurer would compare the checkbook balance, the reconciled bank account balance, and the ending balance number on the C-4 report(s) “to make sure all were equal before filing.”

The treasurer, Mr. Ayers, was responsible for curating the campaign records. The campaign books “consisted of printing the C3 and C4 reports and putting them in a notebook binder in chronological order. The books of account were made available during the public inspection period, however no-one from the campaign including Mr. Ayers received any requests for public inspection.

The Campaign stated that the candidate and the treasurer “communicated regarding C-3 and C-4 reports if there was need to know the reason for an expense or sometimes a contributor’s occupation and employer for contributions exceeding \$100.” The candidate did not review reports before being filed with the PDC.

#### **IV.**

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

- C-1 reports, C-3 reports, and C-4 reports filed by the 2020 Vicki Kraft State Representative Campaign covering the period February 1, through December 31, 2020.
- Email exchanges between PDC staff and Paul Kraft, on behalf of the Vicki Kraft 2020 State Representative Campaign.

- PDC staff queried the PDC Contribution and Expenditure database for the 2020 Vicki Kraft for State Representative Campaign contribution and expenditure information covering the period of February 1 through December 31, 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 Friends of Bill Bruch Campaign for State Representative to the PDC on May 25, 2021, concerning the expenditures selected for audit.

**Audit Exhibit #2** Letter from the 2020 Friends of Bill Bruch Campaign for State Representative provided by the Campaign Treasurer to the PDC on May 25, 2021, concerning the campaign practices and procedures.



# Invoice

Date 10/6/2020

Invoice # 1201

Terms Due on receipt

**Bill To**

Friends of Bill Bruch  
P.O. Box 804  
La Conner, WA 98257

*OK'd*  
*ent - 10/13/20*  
*WIRE TRANSFER*

Description	Qty	Rate	Amount
Cable Buy (10/13-10/26)	1	10,320.00	10,320.00
Radio Buy (10/13-10/26)	1	44,428.00	44,428.00
Payment Due 10/9 COB			
Please wire funds to:			
Huntington National Bank 17 S High Street Columbus, OH 43215			
Routing #: 044000024			
Account #: [REDACTED]			

Please send wire transfer to the following account:  
Bank Name: Huntington Routing Number: 044000024  
Bank Account Number: 01893530799

**Total** \$54,748.00

Payments by mail may be sent to:  
AxMedia LLC  
800 W. 47th Street, Ste. 200  
Kansas City, MO 64112

Overnight payments should be directed to:  
AxMedia LLC  
c/o Patrick Hornung  
800 W. 47th Street, Ste. 200  
Kansas City, MO 64112  
**Audit Exhibit #1**  
Page 1 of 28



# Invoice

Date 9/28/2020

Invoice # 1173

Terms Due on receipt

### Bill To

Friends of Bill Bruch  
P.O. Box 804  
La Conner, WA 98257

*Cash  
9/28/20  
B*

Description	Qty	Rate	Amount
Cable Buy (10/3-10/12)	1	7,367.00	7,367.00
Radio Buy (10/1-10/12)	1	34,057.00	34,057.00
Payment Due 9/29 COB			
Please wire funds to:			
Huntington National Bank 17 S High Street Columbus, OH 43215			
Routing #: 044000024 Account #: [REDACTED]			
<i>Transfer WIRE TRANSFER 9/28/20 B</i>			

Please send wire transfer to the following account:  
Bank Name: Huntington Routing Number: 044000024  
Bank Account Number: [REDACTED]

**Total** \$41,424.00

Payments by mail may be sent to:  
AxMedia LLC  
800 W. 47th Street, Ste. 200  
Kansas City, MO 64112

Overnight payments should be directed to:  
AxMedia LLC  
c/o Patrick Hornung  
800 W. 47th Street, Ste. 200  
Kansas City, MO 64112

## PEOPLES BANK 363 (363)

### Funds Transfer / Payment Order Request

Today's Date	<u>28-SEP-2020</u>	Transfer Date	<u>29-SEP-2020</u>
Branch Name		RETAIL BRANCH (200)	Branch Code <u>200</u>
Originator's Account #			
Online Institution's Routing Number (9 digits)		<u>044000024</u>	
Wire Number <u>202009280137443</u>	Wire Amount	USD 41,424.00	Service Charge <u>25.00</u>
	Debit Amount	USD 41,449.00	Exchange Rate <u>0.00</u>
	Created By	MARISSA UNICK	(CrGL4275)

Telegraphic Name THE HUNTINGTON NATIONAL BANK

Name of Originator FRIENDS OF BILL BRUCH  
 Taxpayer ID  
 Address of Originator PO BOX 804  
LA CONNER WA 98257-0804

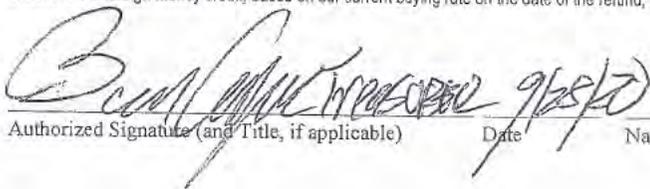
Corresponding Institution  
 (If Beneficiary's Bank is offline or Outside the United States)  
 Beneficiary Institution  
 (Final Destination Bank's Name & Address)

Beneficiary's Name (Final Recipient of Funds) AXMEDIA LLC  
 Beneficiary's Address (required) 800 W. 47TH STREET STE 200  
KANSAS CITY, MO 64112  
UNITED STATES

Beneficiary's Account Number (required) [REDACTED]  
 Other Beneficiary Information, Reference Information, or Payment Instructions

**THIS TRANSACTION IS SUBJECT TO THE FOLLOWING TERMS AND CONDITIONS**

- 1. Processing Payment Orders:** We will use our best efforts to execute your Payment Order on the date received provided the Payment Order is received by us before our established cutoff time and is received on a day which is a business day for us, for the funds transfer or communications facility ("communications facility") selected by us, and for any receiving financial institution. We will treat Payment Orders received by us after our cutoff time as received on our next business day. In our sole discretion, we may reject any Payment Order for any reason. We will notify you of any rejection orally, electronically, or in writing. We are not liable to you for the rejection, and we are not obligated to pay you interest for the period before you receive the notice of rejection. You must provide us with complete and correct beneficiary information including the name of the beneficiary, the name and address of the beneficiary's financial institution, and the beneficiary's account number at that financial institution. Receiving financial institutions may credit a Payment Order on the basis of the account number provided, even if the account number does not correspond to an account of the intended beneficiary.
- 2. Confirmation of Executed Payment Orders:** Provided that prior arrangements have been made, we will send you a notice of debit to your account and a copy of your Payment Order after we have executed your Payment Order. You agree to review these items and report any errors to us immediately.
- 3. Canceling or Amending Payment Orders:** Any request to cancel this Payment Order must be made before we execute it. We will consider a request to amend a Payment Order as a request to cancel it. We will make a reasonable effort to act on a timely request to cancel a Payment Order but we will not be liable if for any reason the Payment Order is not canceled.
- 4. Liability:** We shall be responsible only for performing the services expressly provided for in this Funds Transfer Request, and shall be liable only for our gross negligence or willful misconduct in performing those services. We shall not be responsible for the acts or omissions of any other person, including without limitation any Federal Home Loan Bank, Federal Reserve Bank or communication facility, or any receiving financial institution, and no such person shall be deemed our agent. In no event shall we be liable for any consequential, special, punitive or indirect loss or damage which you may incur or suffer in connection with or arising out of this Funds Transfer Request. We shall be excused from failing to act or delay in acting if such failure or delay is caused by legal constraint, interruption of transmission or communication facilities, conflicts between the time of our execution of a Payment Order and the deadlines of any Federal Reserve Bank or communications facility, equipment failure, war, labor dispute or job action, emergency conditions, acts of God, or other circumstances beyond our control. In addition, we shall be excused from failing to execute or delay in executing a Payment Order if such execution would result in our exceeding any limitations on our intra-day net funds position established according to Federal Reserve Board guidelines or in our otherwise violating any provision of any risk control program of the Federal Reserve Board or any rule or regulation of any other U.S. government regulatory authority.
- 5. Foreign Payment Orders:** You agree that if you request that a Payment Order be sent to a foreign country, we may send the Payment Order in the currency of the receiving financial institution's country at our buying rate of exchange for U.S. dollar transfers. You agree that, if for any reason the Payment Order is returned to us, you will accept the refund in U.S. dollars of the amount of the foreign money credit, based on our current buying rate on the date of the refund, less any charges or expenses to us.

 \_\_\_\_\_  
 Authorized Signature (and Title, if applicable)      Date      Name of business or organization, if applicable

\_\_\_\_\_  
 Authorized Signature (and Title, if applicable)      Date      Authorized Signature (and Title, if applicable)      Date



**STRATEGIES**  
 800 W 47th St., Ste.200  
 Kansas City, MO 64112  
 (816) 407-1222

# Invoice

Date	7/22/2020
Invoice #	12281
Terms	Due Upon Receipt

Bill To  
 Bill Bruch

P.O. No.	Due Date
	7/22/2020

Item	Description	Quantity	Rate	Amount
Direct Mail	04 Experience Leader  ** Payment Due by Drop Date of 7/24 **		9,693.00	9,693.00

**Axiom requires all direct mail to be paid prior to mail drops.**

Please wire money to:  
 Huntington Bank  
 Aect#: XXXXXXXXXX  
 Rout#: 04400024

Overnight Check to:  
 800 W 47th St  
 Suite 200  
 Kansas City, MO 64112

**Total \$9,693.00**

Audit Exhibit #1  
 Page 4 of 28



STRATEGIES

800 W 47th St., Ste.200  
Kansas City, MO 64112  
(816) 407-1222

# Invoice

Date 7/21/2020

Invoice # 12239

Terms Due Upon Receipt

Bill To

Bill Bruch

P.O. No.

Due Date

7/21/2020

Item	Description	Quantity	Rate	Amount
Direct Mail	02 Sex Ed Neg  ** Payment Due Upon Receipt Drop Date 7/21 **		9,693.00	9,693.00

**Total \$9,693.00**

**Axiom requires all direct mail to be paid prior to mail drops.**

**Please wire money to:**

**Huntington Bank**

**Acct#:** [REDACTED]

**Rout#:** 044000024

**Overnight Check to:**

**800 W 47th St**

**Suite 200**

**Kansas City, MO 64112**

Audit Exhibit #1

Page 5 of 28

bruce@ayersconsulting.com

---

**From:** Shelby Blake <sblake@axiomstrategies.com>  
**Sent:** Wednesday, July 22, 2020 1:05 PM  
**To:** bruce@ayersconsulting.com  
**Subject:** Fw: Invoice #12281 from Axiom Strategies  
**Attachments:** Inv\_12281\_from\_Axiom\_Strategies\_LLC\_812201\_76504.pdf; ATT00001.htm

Hi Bruce here is the latest invoice.

HH 16,595 Cost \$9,693

Sub Vendors:

USPS \$3834.12 postage cost from 98499

Print NW 9914 32nd Avenue S.  
Lakewood, WA 98499

*Shelby Lintz (Blake)*

NW Associate | Axiom Strategies

[sblake@axiomstrategies.com](mailto:sblake@axiomstrategies.com) | 503.348.5639



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, forwarding or distribution is prohibited. If you are not the intended recipient, please contact the sender by e-mail and destroy all copies of the original message.

---

**From:** "accounting@axiomstrategies.com" <accounting@axiomstrategies.com>  
**Date:** July 22, 2020 at 12:39:36 PM PDT  
**To:** "bruch4house@gmail.com" <bruch4house@gmail.com>  
**Cc:** Justin Matheson <jmatheson@axiomstrategies.com>  
**Subject:** Invoice #12281 from Axiom Strategies

Axiom Strategies, LLC

**Invoice** DU# 07/22/2020  
12281

Amount Due: **\$9,693.00**

Your invoice is attached. Please remit payment at your earliest convenience.

Audit Exhibit #1  
Page 6 of 28

Bank Wire Information:  
Huntington Bank  
Routing: 044000024  
Acct: [REDACTED]

Remit Checks To:  
Axiom Strategies  
800 W 47th Street  
Suite 200  
Kansas City, MO 64112

Sincerely,  
Axiom Strategies, LLC

816-407-1222  
AxiomStrategies.com

[View & Pay Invoice](#)

Audit Exhibit #1  
Page 7 of 28

# LITHTEX NW

## Printing Solutions

2000 Kentucky Street  
 Bellingham, WA 98229  
 Phone: (360) 676-1977  
 Fax: (360) 676-1895

**Sold To:**

Friends of Bill Bruch  
 PO Box 804  
 La Conner, WA 98257

*Cont  
 OFFICE  
 10/9/20*  


### Invoice

**Invoice Number:**

91867

**Invoice Date:**

Oct 9, 2020

Sales Rep	Customer PO	Shipping Method	Payment Terms	Due Date
Shawn VanDyken		USPS	C.O.D.	10/9/20

Description	Amount
Bio Postcard Mailer ~ Qty 78,000	4,328.00
ECRWSS Mail Prep	1,195.00
Postage	13,118.04
<p><i>Pd 10-9-20</i>  <i>Check # 191</i>  </p>	

Customer Resale Number

**Subtotal** 18,641.04  
**Sales Tax** 480.50  
**Total Invoice Amount** 19,121.54

We gladly accept VISA, Mastercard, Discover and American Express payments for a 2.75% convenience fee.

**Payment/Credit Applied**  
**BALANCE DUE**

19,121.54  
 Audit Exhibit #1  
 Page 8 of 28

The Prosper Group  
PO Box 488  
Greenwood, IN 46142  
317.886.4438  
kelli@prospergroupcorp.com  
prospergroupcorp.com



# INVOICE

INVOICE # 11608  
DATE 10/20/2020  
DUE DATE 10/20/2020

**BILL TO**  
Bill Bruch  
Friends of Bill Bruch

PLEASE DETACH TOP PORTION AND RETURN WITH YOUR PAYMENT.

**SALES REP**  
Tyler Hargrave

DATE	ACTIVITY	QTY	RATE	AMOUNT
	Online Advertising:Ad Creative	1	1,000.00	1,000.00
	Online Advertising:Advertising	1	9,000.00	9,000.00

Thank you for your business!

BALANCE DUE

**USD 10,000.00**

*Review on line  
With Quick book  
Feature 10/21/20*

*Constance  
A*







**PRAISE 106.5**  
 2211 Rimland Drive  
 Suite 116  
 Bellingham, WA 98226  
 Acct: ARMedia@crista.net  
 Main: (360) 922-6222  
 Billing: (360) 922-6222 ext 7223

www.praise1065.com

Billing Address:

**Bill Bruch for House**  
 Attention: Accounts Payable  
 PO Box 804  
 La Conner, WA 98257

Send Payment To:

**PRAISE 106.5**  
**CRISTA Media**  
 2211 Rimland Drive  
 Suite 116  
 Bellingham, WA 98226

# INVOICE

Property	KWPZ-FM		
Invoice #	55984-1	Order #	55984
Invoice Date	11/08/20	Alt Order #	
Invoice Month	November 2020	Deal #	
Invoice Period	10/19/20 - 11/03/20	Flight Dates	10/23/20 - 11/03/20
Advertiser	Bill Bruch for House		
Product	Sex Ed Bill		
Estimate #			
Account Executive	David Miller		
Sales Office	Local Bellingham		
Sales Region	Local		
Agency Code			
Advertiser Code			
Billing Calendar	Calendar		
Billing Type	Cash		
Special Handling			
Agency Ref			
Advertiser Ref			
Product 1			
Product 2			

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/Week	Rate	Type																																																																																																																																																																																																																																																																																																																											
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We warrant that the actual broadcast information shown on this invoice was taken from the program log.  
 To have a PDF of your invoices auto-delivered in email, please contact us at ARMedia@crista.net with the appropriate email address.

**Audit Exhibit #1**  
 Page 12 of 28

The parties to this advertising agreement affirm that nothing in this agreement, or any of the actions, benefits and obligations relating to it, discriminate in any way on the basis of race or ethnicity.

# INVOICE



Send Payment To:  
**PRAISE 106.5**  
**CRISTA Media**  
**2211 Rimland Drive**  
**Suite 116**  
**Bellingham, WA 98226**

Invoice #	55984-1	Invoice Month	November 2020
Invoice Date	11/08/20	Invoice Period	10/19/20 - 11/03/20
Advertiser	Bill Bruch for House		
Product	Sex Ed Bill		
Estimate #			

www.praise1065.com

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/Week	Rate	Type																																																																																																																																																																																																																																																																																																																																																															
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Audit Exhibit #NM

Total Spots 50

Page 13 of 28

Payment Terms 30 Days

Net Total \$1,500.00

PAID IN FULL

We warrant that the actual broadcast information shown on this invoice was taken from the program log.  
 To have a PDF of your invoices auto-delivered in email, please contact us at ARmedia@crista.net with the appropriate email address.

The parties to this advertising agreement affirm that nothing in this agreement, or any of the actions, benefits and obligations relating to it, discriminate in any way on the basis of race or ethnicity.

# INVOICE



**PRAISE 106.5**  
 2211 Rimland Drive  
 Suite 116  
 Bellingham, WA 98226  
 Acct: ARMedia@crista.net  
 Main: (360) 922-6222  
 Billing: (360) 922-6222 ext 7223

www.praise1065.com

Billing Address:

**Bill Bruch for House**  
 Attention: Accounts Payable  
 PO Box 804  
 La Conner, WA 98257

Send Payment To:

**PRAISE 106.5**  
**CRISTA Media**  
 2211 Rimland Drive  
 Suite 116  
 Bellingham, WA 98226

Property	KWPZ-FM		
Invoice #	55780-1	Order #	55780
Invoice Date	11/08/20	Alt Order #	
Invoice Month	November 2020	Deal #	
Invoice Period	10/05/20 - 11/03/20	Flight Dates	10/05/20 - 11/03/20
Advertiser	Bill Bruch for House		
Product			
Estimate #			
Account Executive	David Miller		
Sales Office	Local Bellingham		
Sales Region	Local		
Agency Code			
Advertiser Code			
Billing Calendar	Calendar		
Billing Type	Cash		
Special Handling			
Agency Ref			
Advertiser Ref			
Product 1			
Product 2			

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/ Week	Rate	Type																																																																																																																																																																																																																																																																																																																													
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AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	5	KWPZF	M	10/05/20	10:17 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	46	KWPZF	M	10/05/20	11:41 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	6	KWPZF	M	10/05/20	1:51 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	4	KWPZF	M	10/05/20	2:52 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	9	KWPZF	M	10/05/20	3:50 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	2	KWPZF	M	10/05/20	4:50 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	7	KWPZF	M	10/05/20	5:50 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	1	KWPZF	M	10/05/20	6:52 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	13	KWPZF	Tu	10/06/20	6:01 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	12	KWPZF	Tu	10/06/20	8:29 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	16	KWPZF	Tu	10/06/20	10:47 AM	M-F 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We warrant that the actual broadcast information shown on this invoice was taken from the program log.  
 To have a PDF of your invoices auto-delivered in email, please contact us at ARMedia@crista.net with the appropriate email address.

**Audit Exhibit #1**  
**Page 14 of 28**

The parties to this advertising agreement affirm that nothing in this agreement, or any of the actions, benefits and obligations relating to it, discriminates in any way on the basis of race or ethnicity.

# INVOICE



Send Payment To:  
**PRAISE 106.5**  
**CRISTA Media**  
 2211 Rimland Drive  
 Suite 116  
 Bellingham, WA 98226

Invoice #	55780-1	Invoice Month	November 2020
Invoice Date	11/08/20	Invoice Period	10/05/20 - 11/03/20
Advertiser	Bill Bruch for House		
Product			
Estimate #			

www.praise1065.com

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/ Week	Rate	Type																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
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5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>58</td><td>KWPZF</td><td>Tu</td><td>10/13/20</td><td>1:51 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>62</td><td>KWPZF</td><td>Tu</td><td>10/13/20</td><td>3:50 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>59</td><td>KWPZF</td><td>Tu</td><td>10/13/20</td><td>4:59 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>94</td><td>KWPZF</td><td>Tu</td><td>10/13/20</td><td>5:50 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>63</td><td>KWPZF</td><td>Tu</td><td>10/13/20</td><td>7:17 PM</td><td>M-F 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5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	55	KWPZF	M	10/12/20	1:52 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	49	KWPZF	M	10/12/20	3:19 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	47	KWPZF	M	10/12/20	4:47 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	51	KWPZF	M	10/12/20	5:58 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	52	KWPZF	M	10/12/20	7:17 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	64	KWPZF	Tu	10/13/20	5:35 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	61	KWPZF	Tu	10/13/20	7:34 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	56	KWPZF	Tu	10/13/20	9:08 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	57	KWPZF	Tu	10/13/20	10:48 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	60	KWPZF	Tu	10/13/20	11:43 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	58	KWPZF	Tu	10/13/20	1:51 PM	M-F 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We warrant that the actual broadcast information shown on this invoice was taken from the program log.  
 To have a PDF of your invoices auto-delivered in email, please contact us at ARmedia@crista.net with the appropriate email address.

Audit Exhibit #1  
 Page 15 of 28

The parties to this advertising agreement affirm that nothing in this agreement, or any of the actions, benefits and obligations relating to it, discriminates in any way on the basis of race or ethnicity.

# INVOICE



Send Payment To:  
**PRAISE 106.5**  
**CRISTA Media**  
**2211 Rimland Drive**  
**Suite 116**  
**Bellingham, WA 98226**

Invoice #	55780-1	Invoice Month	November 2020
Invoice Date	11/08/20	Invoice Period	10/05/20 - 11/03/20
Advertiser	Bill Bruch for House		
Product			
Estimate #			

www.praise1065.com

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/ Week	Rate	Type																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
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ED	\$20.00	NM	77	KWPZF	Th	10/15/20	8:32 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	82	KWPZF	Th	10/15/20	10:16 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	74	KWPZF	Th	10/15/20	11:41 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	78	KWPZF	Th	10/15/20	12:45 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	75	KWPZF	Th	10/15/20	2:18 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	76	KWPZF	Th	10/15/20	3:16 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	80	KWPZF	Th	10/15/20	5:17 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	95	KWPZF	Th	10/15/20	6:20 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	84	KWPZF	F	10/16/20	6:01 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	85	KWPZF	F	10/16/20	8:02 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	90	KWPZF	F	10/16/20	8:58 AM	M-F 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</thead> <tbody> <tr><td>97</td><td>KWPZF</td><td>M</td><td>10/19/20</td><td>6:05 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$28.00</td><td>NM</td></tr> <tr><td>106</td><td>KWPZF</td><td>M</td><td>10/19/20</td><td>6:58 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$28.00</td><td>NM</td></tr> <tr><td>104</td><td>KWPZF</td><td>M</td><td>10/19/20</td><td>8:01 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$28.00</td><td>NM</td></tr> <tr><td>105</td><td>KWPZF</td><td>M</td><td>10/19/20</td><td>10:15 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$28.00</td><td>NM</td></tr> <tr><td>118</td><td>KWPZF</td><td>M</td><td>10/19/20</td><td>11:41 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$28.00</td><td>NM</td></tr> 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<tr><td>100</td><td>KWPZF</td><td>M</td><td>10/19/20</td><td>7:18 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$28.00</td><td>NM</td></tr> <tr><td>107</td><td>KWPZF</td><td>F</td><td>10/23/20</td><td>6:38 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$28.00</td><td>NM</td></tr> <tr><td>108</td><td>KWPZF</td><td>F</td><td>10/23/20</td><td>8:30 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$28.00</td><td>NM</td></tr> <tr><td>116</td><td>KWPZF</td><td>F</td><td>10/23/20</td><td>9:30 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$28.00</td><td>NM</td></tr> </tbody> </table>										Spots: #	Ch	Day	Air Date	Air Time	Description	Start/End Time	Length	Ad-ID	Rate	Type	97	KWPZF	M	10/19/20	6:05 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	106	KWPZF	M	10/19/20	6:58 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	104	KWPZF	M	10/19/20	8:01 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	105	KWPZF	M	10/19/20	10:15 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	118	KWPZF	M	10/19/20	11:41 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	98	KWPZF	M	10/19/20	12:44 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	103	KWPZF	M	10/19/20	1:45 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	99	KWPZF	M	10/19/20	2:51 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	102	KWPZF	M	10/19/20	3:51 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	101	KWPZF	M	10/19/20	4:51 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	100	KWPZF	M	10/19/20	7:18 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	107	KWPZF	F	10/23/20	6:38 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	108	KWPZF	F	10/23/20	8:30 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	116	KWPZF	F	10/23/20	9:30 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM
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We warrant that the actual broadcast information shown on this invoice was taken from the program log.  
 To have a PDF of your invoices auto-delivered in email, please contact us at ARmedia@crista.net with the appropriate email address.

**Audit Exhibit #1**  
**Page 16 of 28**

The parties to this advertising agreement affirm that nothing in this agreement, or any of the actions, benefits and obligations relating to it, discriminate in any way on the basis of race or ethnicity.

# INVOICE



Send Payment To:  
**PRAISE 106.5**  
**CRISTA Media**  
**2211 Rimland Drive**  
**Suite 116**  
**Bellingham, WA 98226**

www.praise1065.com

Invoice #	55780-1	Invoice Month	November 2020
Invoice Date	11/08/20	Invoice Period	10/05/20 - 11/03/20
Advertiser	Bill Bruch for House		
Product			
Estimate #			

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/ Week	Rate	Type																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										
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<tr><td>125</td><td>KWPZF</td><td>M</td><td>10/26/20</td><td>1:19 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>127</td><td>KWPZF</td><td>M</td><td>10/26/20</td><td>2:19 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>168</td><td>KWPZF</td><td>M</td><td>10/26/20</td><td>3:13 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>121</td><td>KWPZF</td><td>M</td><td>10/26/20</td><td>4:48 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>119</td><td>KWPZF</td><td>M</td><td>10/26/20</td><td>5:19 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> 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<tr><td>128</td><td>KWPZF</td><td>Tu</td><td>10/27/20</td><td>12:42 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>132</td><td>KWPZF</td><td>Tu</td><td>10/27/20</td><td>2:50 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>129</td><td>KWPZF</td><td>Tu</td><td>10/27/20</td><td>3:49 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>164</td><td>KWPZF</td><td>Tu</td><td>10/27/20</td><td>4:51 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>131</td><td>KWPZF</td><td>Tu</td><td>10/27/20</td><td>6:16 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>136</td><td>KWPZF</td><td>Tu</td><td>10/27/20</td><td>7:17 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>141</td><td>KWPZF</td><td>W</td><td>10/28/20</td><td>7:33 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>140</td><td>KWPZF</td><td>W</td><td>10/28/20</td><td>8:31 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>138</td><td>KWPZF</td><td>W</td><td>10/28/20</td><td>11:16 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>143</td><td>KWPZF</td><td>W</td><td>10/28/20</td><td>12:17 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>137</td><td>KWPZF</td><td>W</td><td>10/28/20</td><td>1:17 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>139</td><td>KWPZF</td><td>W</td><td>10/28/20</td><td>2:55 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>144</td><td>KWPZF</td><td>W</td><td>10/28/20</td><td>3:53 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>142</td><td>KWPZF</td><td>W</td><td>10/28/20</td><td>4:51 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>165</td><td>KWPZF</td><td>W</td><td>10/28/20</td><td>5:54 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>145</td><td>KWPZF</td><td>W</td><td>10/28/20</td><td>7:17 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>146</td><td>KWPZF</td><td>Th</td><td>10/29/20</td><td>6:04 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>149</td><td>KWPZF</td><td>Th</td><td>10/29/20</td><td>7:05 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>166</td><td>KWPZF</td><td>Th</td><td>10/29/20</td><td>9:34 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>153</td><td>KWPZF</td><td>Th</td><td>10/29/20</td><td>11:18 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> </tbody> </table>										Spots: #	Ch	Day	Air Date	Air Time	Description	Start/End Time	Length	Ad-ID	Rate	Type	112	KWPZF	F	10/23/20	11:14 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	113	KWPZF	F	10/23/20	12:19 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	109	KWPZF	F	10/23/20	1:14 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	117	KWPZF	F	10/23/20	3:21 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	115	KWPZF	F	10/23/20	4:17 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	110	KWPZF	F	10/23/20	4:54 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	114	KWPZF	F	10/23/20	6:21 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$28.00	NM	111	KWPZF	F	10/23/20	7:16 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$28.00	NM	Weeks:	Start Date	End Date	MTWTFSS	Spots/Week	Rate							10/26/20	11/01/20	MTWTF--	50	\$20.00						Spots: #	Ch	Day	Air Date	Air Time	Description	Start/End Time	Length	Ad-ID	Rate	Type	120	KWPZF	M	10/26/20	6:04 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	122	KWPZF	M	10/26/20	8:28 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	126	KWPZF	M	10/26/20	9:31 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	124	KWPZF	M	10/26/20	11:19 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	125	KWPZF	M	10/26/20	1:19 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	127	KWPZF	M	10/26/20	2:19 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	168	KWPZF	M	10/26/20	3:13 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	121	KWPZF	M	10/26/20	4:48 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	119	KWPZF	M	10/26/20	5:19 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	123	KWPZF	M	10/26/20	6:16 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	130	KWPZF	Tu	10/27/20	5:33 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	134	KWPZF	Tu	10/27/20	8:31 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	135	KWPZF	Tu	10/27/20	9:34 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	133	KWPZF	Tu	10/27/20	11:43 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	128	KWPZF	Tu	10/27/20	12:42 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	132	KWPZF	Tu	10/27/20	2:50 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	129	KWPZF	Tu	10/27/20	3:49 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	164	KWPZF	Tu	10/27/20	4:51 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	131	KWPZF	Tu	10/27/20	6:16 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	136	KWPZF	Tu	10/27/20	7:17 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	141	KWPZF	W	10/28/20	7:33 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	140	KWPZF	W	10/28/20	8:31 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	138	KWPZF	W	10/28/20	11:16 AM	M-F 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5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM
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We warrant that the actual broadcast information shown on this invoice was taken from the program log.  
 To have a PDF of your invoices auto-delivered in email, please contact us at ARmedia@crista.net with the appropriate email address.

**Audit Exhibit #1**  
**Page 17 of 28**

The parties to this advertising agreement affirm that nothing in this agreement, or any of the actions, benefits and obligations relating to it, discriminate in any way on the basis of race or ethnicity.

# INVOICE



Send Payment To:  
**PRAISE 106.5**  
**CRISTA Media**  
**2211 Rimland Drive**  
**Suite 116**  
**Bellingham, WA 98226**

www.praise1065.com

Invoice #	55780-1	Invoice Month	November 2020
Invoice Date	11/08/20	Invoice Period	10/05/20 - 11/03/20
Advertiser	Bill Bruch for House		
Product			
Estimate #			

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/ Week	Rate	Type																																																																																																																																																																																																																																																																																					
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<table border="1"> <thead> <tr> <th>Spots: #</th> <th>Ch</th> <th>Day</th> <th>Air Date</th> <th>Air Time</th> <th>Description</th> <th>Start/End Time</th> <th>Length</th> <th>Ad-ID</th> <th>Rate</th> <th>Type</th> </tr> </thead> <tbody> <tr><td>147</td><td>KWPZF</td><td>Th</td><td>10/29/20</td><td>1:21 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>152</td><td>KWPZF</td><td>Th</td><td>10/29/20</td><td>2:22 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>150</td><td>KWPZF</td><td>Th</td><td>10/29/20</td><td>4:16 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>154</td><td>KWPZF</td><td>Th</td><td>10/29/20</td><td>5:15 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>151</td><td>KWPZF</td><td>Th</td><td>10/29/20</td><td>6:14 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>148</td><td>KWPZF</td><td>Th</td><td>10/29/20</td><td>7:19 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>162</td><td>KWPZF</td><td>F</td><td>10/30/20</td><td>5:36 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>160</td><td>KWPZF</td><td>F</td><td>10/30/20</td><td>7:06 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>158</td><td>KWPZF</td><td>F</td><td>10/30/20</td><td>9:32 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>163</td><td>KWPZF</td><td>F</td><td>10/30/20</td><td>11:42 AM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>167</td><td>KWPZF</td><td>F</td><td>10/30/20</td><td>12:44 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>155</td><td>KWPZF</td><td>F</td><td>10/30/20</td><td>1:49 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>159</td><td>KWPZF</td><td>F</td><td>10/30/20</td><td>3:53 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>157</td><td>KWPZF</td><td>F</td><td>10/30/20</td><td>4:50 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> <tr><td>161</td><td>KWPZF</td><td>F</td><td>10/30/20</td><td>5:54 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_Taxes</td><td>\$20.00</td><td>NM</td></tr> <tr><td>156</td><td>KWPZF</td><td>F</td><td>10/30/20</td><td>6:48 PM</td><td>M-F 5:30am-7:30pm</td><td>5:30am-7:30pm</td><td>:30</td><td>BB0920_SEX ED</td><td>\$20.00</td><td>NM</td></tr> </tbody> </table>										Spots: #	Ch	Day	Air Date	Air Time	Description	Start/End Time	Length	Ad-ID	Rate	Type	147	KWPZF	Th	10/29/20	1:21 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	152	KWPZF	Th	10/29/20	2:22 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	150	KWPZF	Th	10/29/20	4:16 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	154	KWPZF	Th	10/29/20	5:15 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	151	KWPZF	Th	10/29/20	6:14 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	148	KWPZF	Th	10/29/20	7:19 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	162	KWPZF	F	10/30/20	5:36 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	160	KWPZF	F	10/30/20	7:06 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	158	KWPZF	F	10/30/20	9:32 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	163	KWPZF	F	10/30/20	11:42 AM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	167	KWPZF	F	10/30/20	12:44 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	155	KWPZF	F	10/30/20	1:49 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	159	KWPZF	F	10/30/20	3:53 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	157	KWPZF	F	10/30/20	4:50 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM	161	KWPZF	F	10/30/20	5:54 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM	156	KWPZF	F	10/30/20	6:48 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_SEX ED	\$20.00	NM																																																																																										
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161	KWPZF	F	10/30/20	5:54 PM	M-F 5:30am-7:30pm	5:30am-7:30pm	:30	BB0920_Taxes	\$20.00	NM																																																																																																																																																																																																																																																																																				
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We warrant that the actual broadcast information shown on this invoice was taken from the program log.  
 To have a PDF of your invoices auto-delivered in email, please contact us at ARmedia@crista.net with the appropriate email address.†

Audit Exhibit #1

The parties to this advertising agreement affirm that nothing in this agreement, or any of the actions, benefits and obligations relating to it, discriminate in any way on the basis of race or ethnicity. Page 18 of 28

# INVOICE



Send Payment To:  
**PRAISE 106.5**  
**CRISTA Media**  
**2211 Rimland Drive**  
**Suite 116**  
**Bellingham, WA 98226**

Invoice #	55780-1	Invoice Month	November 2020
Invoice Date	11/08/20	Invoice Period	10/05/20 - 11/03/20
Advertiser	Bill Bruch for House		
Product			
Estimate #			

www.praise1065.com

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/ Week	Rate	Type																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
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ED	\$15.00	NM	50	KWPZF	Sa	10/24/20	8:22 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_Taxes	\$15.00	NM	39	KWPZF	Sa	10/24/20	10:13 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_SEX ED	\$15.00	NM	46	KWPZF	Su	10/25/20	6:15 AM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_Taxes	\$15.00	NM	47	KWPZF	Su	10/25/20	10:21 AM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_SEX ED	\$15.00	NM	44	KWPZF	Su	10/25/20	12:50 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_Taxes	\$15.00	NM	42	KWPZF	Su	10/25/20	2:14 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_SEX ED	\$15.00	NM	48	KWPZF	Su	10/25/20	5:14 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_Taxes	\$15.00	NM	49	KWPZF	Su	10/25/20	8:19 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_SEX ED	\$15.00	NM	45	KWPZF	Su	10/25/20	9:42 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_Taxes	\$15.00	NM	43	KWPZF	Su	10/25/20	11:12 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_SEX ED	\$15.00	NM	Weeks:	Start Date	End Date	MTWTFSS	Spots/Week	Rate							10/26/20	11/01/20	-----SS	16	\$13.00						<table border="1"> <thead> <tr> <th>Spots: #</th> <th>Ch</th> <th>Day</th> 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We warrant that the actual broadcast information shown on this invoice was taken from the program log.  
 To have a PDF of your invoices auto-delivered in email, please contact us at ARmedia@crista.net with the appropriate email address.

**Audit Exhibit #1**  
**Page 19 of 28**

The parties to this advertising agreement affirm that nothing in this agreement, or any of the actions, benefits and obligations relating to it, discriminates in any way on the basis of race or ethnicity.

# INVOICE



Send Payment To:  
**PRAISE 106.5**  
**CRISTA Media**  
**2211 Rimland Drive**  
**Suite 116**  
**Bellingham, WA 98226**

Invoice #	55780-1	Invoice Month	November 2020
Invoice Date	11/08/20	Invoice Period	10/05/20 - 11/03/20
Advertiser	Bill Bruch for House		
Product			
Estimate #			

[www.praise1065.com](http://www.praise1065.com)

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/ Week	Rate	Type	
2	10/10/20	11/01/20	Sat-Sun 6a-12a	6a-12am	-----	:30	0	\$0.00	NM	
Spots: # Ch Day Air Date Air Time Description Start/End Time Length Ad-ID Rate Type										
61	KWPZF	Su	11/01/20	11:20 AM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_Taxes	\$13.00 NM	
59	KWPZF	Su	11/01/20	1:16 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_SEX ED	\$13.00 NM	
64	KWPZF	Su	11/01/20	2:46 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_Taxes	\$13.00 NM	
65	KWPZF	Su	11/01/20	4:16 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_SEX ED	\$13.00 NM	
60	KWPZF	Su	11/01/20	7:11 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_Taxes	\$13.00 NM	
63	KWPZF	Su	11/01/20	9:16 PM	Sat-Sun 6a-12a	6a-12am	:30	BB0920_SEX ED	\$13.00 NM	
3	10/12/20	11/03/20	Donna Totey	Donna Totey - Sex	MTWTFSS	:00	0	\$150.00	NS	
Spots: # Ch Day Air Date Air Time Description Start/End Time Length Ad-ID Rate Type										
1	KWPZF	Tu	10/13/20		Donna Totey	Donna Totey - Sex	:00		\$150.00 NS	
<b>Total Spots</b>							<b>235</b>			

**Payment Terms 30 Days**

Net Total **\$4,976.00**

**PAID IN FULL**

**Audit Exhibit #1**  
**Page 20 of 28**

We warrant that the actual broadcast information shown on this invoice was taken from the program log. To have a PDF of your invoices auto-delivered in email, please contact us at ARmedia@crista.net with the appropriate email address.\*

The parties to this advertising agreement affirm that nothing in this agreement, or any of the actions, benefits and obligations relating to it, discriminate in any way on the basis of race or ethnicity.


[www.praise1065.com](http://www.praise1065.com)

**PRAISE 106.5**  
**CRISTA Media**  
 2211 Rimland Drive  
 Suite 116  
 Bellingham, WA 98226  
 Main: (360) 922-6222  
 Billing: (360) 922-6222 ext 7223

## CASH STATEMENT

Property	Billing Type	Statement Date	Statement Period
KWPZ-FM	Cash	05/14/21	10/26/20 - 05/14/21

**Billing Address:**

Bill Bruch for House  
 Attention: Accounts Payable  
 PO Box 804  
 La Conner, WA 98257

**Agency Summary:**

		Previous Balance		New Invoices		New Payments	=	New Balance
		(\$6,476.00)	+	\$6,476.00	+	\$0.00	=	\$0.00
<u>Current</u>	<u>30</u>	<u>60</u>		<u>90</u>		<u>120+</u>		
\$0.00	\$0.00	\$0.00		\$0.00		\$0.00		

**Advertiser Summaries:**

<b>Bill Bruch for House</b>								
		Previous Balance		New Invoices		New Payments	=	New Balance
		(\$1,650.00)	+	\$6,476.00	+	(\$4,826.00)	=	\$0.00
<u>Current</u>	<u>30</u>	<u>60</u>		<u>90</u>		<u>120+</u>		
\$0.00	\$0.00	\$0.00		\$0.00		\$0.00		
Property	Invoice #	Date	Invoice Amount	Transaction Type	Transaction Number	Transaction Amount		Invoice Balance
KWPZ-FM	55780-1	11/08/20	\$4,976.00					\$0.00
		09/24/20		Cash/Check DEP	280	(\$4,826.00)		
		10/21/20		Cash/Check DEP	229	(\$150.00)		
KWPZ-FM	55984-1	11/08/20	\$1,500.00					\$0.00
		10/21/20		Cash/Check DEP	229	(\$1,500.00)		

**Payment Terms 30 Days**

Audit Exhibit #1  
 Page 21 of 28

# CONTRACT



**PRAISE 106.5**  
 2211 Rimland Drive  
 Suite 116  
 Bellingham, WA 98226  
 Fax: (360) 922-6241  
 (360) 922-6222

www.praise1065.com

<u>Contract / Revision</u> 55984 /		<u>Alt Order #</u>
<u>Advertiser</u> Bill Bruch for House		<u>Original Date / Revision</u> 10/19/20 / 10/19/20
<u>Contract Dates</u> 10/23/20 - 11/03/20	<u>Estimate #</u>	
<u>Product</u> Sex Ed Bill		
<u>Billing Cycle</u> EOC	<u>Billing Calendar</u> Calendar	<u>Cash/Trade</u> Cash
<u>Property</u> KWPZ-FM	<u>Account Executive</u> David Miller	<u>Sales Office</u> Local Bellinghar
<u>Special Handling</u>		
<u>Demographic</u> Households		
<u>Agency Code</u>	<u>Advertiser Code</u>	<u>Product 1/2</u>
<u>Agency Ref</u>	<u>Advertiser Ref</u>	

And:

**Bill Bruch for House**  
 Attention: Bill Bruch  
 PO Box 804  
 La Conner, WA 98257

*Line	Ch	Start Date	End Date	Description	Start/End Time	Days	Length	Spots/Week	Rate	Type	Spots	Amount
N 1	KWPZ	10/23/20	11/03/20	M-Sun 5:30am-7:30pm	5:30am-7:30pm		:30			NM	50	
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>			
Week:		10/19/20	10/25/20	----FSS				12				
Week:		10/26/20	11/01/20	MTWTFSS				30				
Week:		11/02/20	11/08/20	MT-----				8				
<b>Totals</b>											50	\$1,500.00

Time Period	# of Spots	Gross Amount	Net Amount
10/19/20 - 11/03/20	50	\$1,500.00	\$1,500.00
<b>Totals</b>	50	\$1,500.00	\$1,500.00

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

*Customer open at 10/26/20*  
 # 229

**Audit Exhibit #1**  
 Page 22 of 28

(\* Line Transactions: N = New, E = Edited, D = Deleted)

The parties to this advertising agreement affirm that nothing in this agreement, or any of the actions, benefits and obligations relating to it, discriminate in any way on the basis of race or ethnicity. Notwithstanding to whom bills are rendered, advertiser, agency and service, jointly and severally, shall remain obligated to pay to station the amount of any bills rendered by station within the time specified and until payment in full is received by station. Payment by advertiser to agency or to service or payment by agency to service, shall not constitute payment to station. Station will not be bound by conditions, printed or otherwise contracts, insertion orders, copy instructions or any correspondence when such conflict with the above terms and conditions. Two week advance cancellation notice is required unless otherwise specified.

Whidbey Weekly LLC  
P.O. Box 1098  
Oak Harbor, WA 98277  
(360) 682-2341



*Not cleared*  
*WBB*  
*9/30/20*

# INVOICE

**BILL TO**  
Friends of Bill Bruch  
P.O. Box 804  
La Conner, WA 98257

**INVOICE #** 11989  
**DATE** 09/30/2020  
**DUE DATE** 09/30/2020  
**TERMS** Due on receipt

ACTIVITY	QTY	RATE	AMOUNT
<b>4.06 Island Times</b>	1	225.00	225.00
Island Times Volume 4, Issue 6: October 2020 1/4 page advertisement			
<b>Color Charge</b>	1	25.00	25.00
Color Charge			
<b>12.41 1/4 page advertisement</b>	1	125.00	125.00
Volume 12, Issue #41: 10-8-20 1/4 page advertisement			
<b>Color Charge</b>	1	25.00	25.00
Color Charge			
<b>Post It Notes</b>	1	400.00	400.00
Post It Note printing & application: Volume 12, Issue #41: 10-8-20			
<b>12.42 1/4 page advertisement</b>	1	225.00	225.00
Volume 12, Issue #42: 10-15-20 1/4 page advertisement			
<b>Color Charge</b>	1	25.00	25.00
Color Charge			
<b>Post It Notes</b>	1	400.00	400.00
Post It Note printing & application: Volume 12, Issue #42: 10-15-20			
<b>12.43 1/4 page advertisement</b>	1	225.00	225.00
Volume 12, Issue #43: 10-22-20 1/4 page advertisement			
<b>Color Charge</b>	1	25.00	25.00
Color Charge			
<b>Post It Notes</b>	1	400.00	400.00
Post It Note printing & application: Volume 12, Issue #43: 10-22-20			
<b>12.44 1/4 page advertisement</b>	1	225.00	225.00
Volume 12, Issue #44: 10-29-20 1/4 page advertisement			
<b>Color Charge</b>	1	25.00	25.00
Color Charge			
<b>Post It Notes</b>	1	400.00	400.00
Post It Note printing & application: Volume 12, Issue #44: 10-29-20 1/4 page advertisement			
<b>4.07 Island Times</b>	1	225.00	225.00
Island Times Volume 4, Issue 7: November 2020 1/4 page advertisement			
<b>Color Charge</b>	1	25.00	25.00
Color Charge			

Audit Exhibit #1  
Page 23 of 28

Balances 30 days past due are subject to the greater of a \$15.00 re-billing fee or a 2% finance charge per month on the unpaid balance.  
Balances 90 days past due will be turned over for third party collections. For your convenience we accept debit or credit cards. Please call the office to pay by cc.

BALANCE DUE

**\$3,000.00**

Audit Exhibit #1  
Page 24 of 28

Balances 30 days past due are subject to the greater of a \$15.00 re-billing fee or a 2% finance charge per month on the unpaid balance.  
Balances 90 days past due will be turned over for third party collections. For your convenience we accept debit or credit cards. Please call the office to pay by cc.

BILLING PERIOD		ADVERTISER/CLIENT NAME	
10/10/20		0	
TOTAL AMOUNT DUE	UNAPPLIED AMOUNT	TERMS OF PAYMENT	
\$1,700.00		C.O.D.	
CURRENT NET AMOUNT DUE	30 DAYS	60 DAYS	OVER 90 DAYS
\$1,700.00			

**ADVERTISING STATEMENT & INVOICE / AFFIDAVIT**

INVOICE #	PAGE #	BILLING DATE	BILLED ACCOUNT #

BILLED ACCOUNT NAME AND ADDRESS		REMITTANCE TO	
Friends of Bill Bruch		<b>SOUND PUBLISHING, INC</b> P.O. BOX 1200 COUPEVILLE, WA 98239	

PLEASE DETACH AND RETURN UPPER PORTION WITH YOUR REMITTANCE

DATE	INVOICE	DESCRIPTION-OTHER COMMENTS/CHARGES	SAU SIZE BILLED UNITS	TIMES RUN RATE	NET AMOUNT
09/25/20		Whidbey News Times Whidbey News Times  To Be Paid by 10/7	4x4	10/10, 10/17, 10/24, 10/31 Total	425.00 each x4 \$1,700.00

*Current  
10/11/20*

CURRENT NET AMOUNT DUE	30 DAYS	60 DAYS	OVER 90 DAYS	*UNAPPLIED AMOUNT	TOTAL AMOUNT DUE
\$1,700.00					\$1,700.00

**STATEMENT OF ACCOUNT** AGING OF PAST DUE AMOUNTS

THE INVOICE STATEMENT SHALL BE DEEMED CORRECT UNLESS ADVISED IN WRITING WITHIN 30 DAYS OF BILLING DATE

INVOICE #	BILLING PERIOD	BILLED ACCOUNT NO.	ADVERTISING CLIENT NAME
0	10/10/20	0	0

A FINANCE CHARGE OF 1½% WHICH IS AN ANNUAL RATE OF 18% WILL BE ADDED TO ACCOUNTS OVER 30 DAYS



## 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: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

May 3, 2021

Sent Electronically to William Bruch and Bruce Ayers, 2020 Campaign Treasurer

Subject: PDC Audit Letter, 2020 William Bruch for State Representative Campaign; PDC Audit No. 20-14

Dear Mr. Bruch and Mr. Ayers:

This letter is a follow-up to the email PDC staff sent notifying both of you that the 2020 William Bruch 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 that comprised the initial audit pool of eight candidates selected for limited-scope audits that have substantially been completed. Staff is using the same criteria in selecting the 2020 House of Representative candidates for audit that was used for the 2018 Senate candidates that 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 10<sup>th</sup> Legislative District, Position #2 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.

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

1. Two expenditures made to AX Media, LLC totaling \$96,172 that included a \$54,748 expenditure made on October 9, 2020, for a Comcast TV ad buy that totaled \$10,320 (10/13 to 10/26) and a Radio buy that totaled \$44,428 (10/13 to 10/26); and a \$41,424 expenditure made on September 28, 2020, for “Cable TV and Radio buys).
2. Four expenditures totaling \$19,386 made to Axiom Strategies, LLC on July 21 and 23, 2020, to print and mail two 16,595 direct mail pieces.
3. Two expenditures totaling \$19,121.54 made to Lithtex NW on October 9, 2020 that included a \$13,118.04 expenditure made for “73K Postage for Mailer”; and a \$6,003.50 expenditure made for “78K Printing, Mail Prep and Sales Tax.”
4. A \$10,000 expenditure made on October 21, 2020, to The Proper Group for “Online Advertising: Creative \$1,000 and Advertising \$9,000.”
5. Two expenditures totaling \$7,667.60 made to Skagit Publishing that included a \$5,950.40 expenditure made on September 30, 2020 for “Post it and Print Ads”; and a \$1,717 expenditure was made on July 15, 2020, for “6 4 x 3 Skagit Herald and Stanwood News” advertisements.
6. Two expenditures totaling \$6,476 made to Praise 106.5 that included a \$4,826 expenditure made on September 18, 2020 for “Radio Ads Sept. – October 2020”; and a \$1,650 expenditure made on October 23, 2020, for “50 Radio Spots 10/23 to 11/3.”
7. A \$3,000 expenditure made on September 30, 2020, to Whidbey Weekly and Printing for “Newspaper production and ad and Post it Note ads.”
8. A \$1,700 expenditure made on September 25, 2020, to Sound Publishing, Inc. for “Two weekly ads.”

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 17, 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 or your Treasurer has any questions, please contact Mr. Young at (360) 664-8854, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.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





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May 25 2021  
File No. 19022

Public Disclosure Commission  
711 Capital Way Rm 206  
Olympia, WA 98504

**E-MAIL DELIVERY**

Attn: Kurt Young, Compliance Officer  
E-Mail: [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov)

Re: Response to Audit Letter dated May 2, 2021

Dear Kurt,

Please find attached all of the requested expense receipts and campaign process information you requested as per your subject Audit Letter:

Item 1: The campaign received donations using campaign donation envelopes either received directly from the donor to the candidate (Bill Bruch) or by USPS mail to the campaign mail box. The envelopes had a pre-printed form that requested the needed PDC information for each donation. It included the over \$100 dollar donation line for occupation, employer, city and state information. The candidate provided to donors the "not a foreign entity" declaration as needed. If business donations were received in the mail the campaign Treasurer (PDC Compliance Ayers Consulting Llc) would call or email the donor business the "not a foreign entity" form to them to declare they were not a foreign entity or using foreign funds to make the campaign donation.

In addition, the campaign received on-line donations using Anedot credit card processing services. The on-line form also included the necessary donor donation information for address occupation and employer for donation over \$100. The on-line donation form included the "not a foreign entity" form for donation from non-individual donors. (businesses)

The candidate would check the campaign mail box every couple days. The candidate would take a picture of any donations received (and envelope, if needed) and deposit the donations in the bank usually two or three times a week depending on the number of donations received. The candidate would then txt or email the donation checks pictures received and deposited to the bank to the campaign Treasurer the same day he deposited them into the bank.

The Treasurer and the Candidate would receive an individual email from Anedot daily for every donation made on line with the date and amount of the donation. Anedot usually takes 3 to 5 business days to transfer the net donation (after fees) to the campaign bank account. The treasurer depending on the number of donation would post daily to ORCA and file the required C3 the following day or no later than the following Monday following the bank deposit of

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By: Ayers Consulting LLC  
PDC Compliance Treasurer  
May 25, 2021  
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transfer of funds to the campaign bank account. Of course any "last minute donations" were filed with the PDC the next day in accordance with PDC specifications.

Item 2: The candidate ordered or approved all campaign expenditures. He consulted with Axiom Strategies for most of the campaign advertising and mailing expensed. Axiom Strategies would coordinate, prepare and execute the direct mail, social media, radio and TV advertising. The candidate would approve all expenses and direct mail pieces. The candidate directly ordered and paid (by credit card) local radio advertising.

Whenever possible it was standard practice to pay for campaign expenses using the campaigns debit card. Only the candidate or the Treasurer had access to a campaign bank account debit card. The candidate would write checks for campaign expenses when it was more convenient or the campaign received a discount for checks versus using the debit card.

The candidate would take a picture of any checks written or receipts received for campaign expenses and txt or email the expenditure receipts or order to the Treasurer. Axiom Strategies would email their invoices directly to the candidate and the Treasurer. The candidate would approve the invoice. The campaign treasurer would post to ORCA and pay Axiom Strategies and other expenses either online or by using 'bill pay' services provided by the campaigns bank.

The campaign treasure would post all expenses to ORCA daily or weekly. Before submitting the required C4 the treasurer would reconcile all expenditures to the bank account to be sure all debit card, checks and bill payment expenses that were paid during the C4 period were accounted for before filing the C4 in accordance with PDC specifications.

Item 3: After receiving receipts, emails, txt, photos for donation and expenditures from the Candidate the Treasure would post to ORCA daily and weekly depending on the PDC specification and number of posting. C3's and C4's were always prepared in ORCA and uploaded in accordance with PDC specification daily, weekly or monthly. The candidate would automatically receive an email from the PDC every time a C3 or C4 was uploaded. The candidate did not approve the C3 or C4 before the treasure uploaded them. The candidate does not have access to the ORCA software because only on user at a time can post and file reports in the current version of ORCA without doing full backups and restoring procedures.

Item 4: Campaign donation emails, Anedot and txt are printed and saved in a paper file by the ce Treasurer. In addition, the Candidate and the Treasurer retained original copies of the donation envelopes for thank you and mailing list purposes. Anedot donation emails are also emailed to the candidate for thank you and mailing list purposes.

Expenditures pictures of receipts and orders emailed or txt were printed by the campaign Treasurer and put into a campaign paper file. Electronic files of these documents are also saved in a campaign folder. Bank statements are printed and retained in the campaign file for public viewing.

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PDC Compliance Treasurer  
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Item 5: The campaign compliance PDC Treasurer has maintained campaign records. Yes the campaign paper books were available for public inspection. There were no requested public inspection.

Item 6: There are only two officers listed on the C1 filing. The candidate and the Treasurer. The candidate did receive some reimbursements for campaign printing or stamps or other basic office supplies, when he did not have a check or his debit card. They are noted on the C4's and the receipts are available in the paper or electronic campaign files.

The PDC Compliance Treasure did receive a monthly services rendered fee of \$300.00. Ayers Consulting Llc invoiced the campaign monthly, invoices are printed and put in the campaign paper file. They were reported on the monthly C4's. They were paid by ACH transfers on the 1<sup>st</sup> of the month for the following month from the campaign bank account.

I understand this submission provides all requested information and campaign process requested at this time.

Sincerely,

AYERS CONSULTING, LLC



Bruce D. Ayers, PDC Compliance, Treasure  
Friends of Bill Bruch Campaign

Enclosure