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**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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Public Disclosure Commission Statement of Understanding

James W. Nelson PDC Case 78848

(Printed Name)

as a 2020 candidate for Whatcom County Superior Court Judge,
Position 4 in 2020, hereby acknowledge:

I violated RCW 42.17A.235 by failing to timely report contributions and expenditures on the 21- Day Pre-Primary Summary Full Campaign Contribution and Expenditure report (C-4 report).

RCW 42.17A.235 requires candidates under the full reporting option to timely and accurately file reports of contributions and expenditures, including on the twenty-first day and the seventh day immediately preceding the November 3, 2020 general election.

- On May 29, 2020, James W Nelson registered with the PDC declaring his candidacy for Whatcom County Superior County Judge for the 2020 election, selecting the Full Reporting Option. Nelson is a first-time candidate who used only personal funds to self-fund the 2020 campaign for Judge.
- On October 27, 2020, James W. Nelson Campaign (Campaign) filed a 21-Day Pre-General Election C-4 report with the PDC, disclosing \$31,524.41 for in-kind contributions and expenditures, paid for by Nelson, for goods and services. The Campaign was required to file the 21-Day Pre-General Election C-4 report no later than October 13, 2020, covering the period September 1 through October 12, 2020.
- The 21-Day Pre-General Election C-4 report was filed 14 days late by the Campaign, and seven days before the November 3, 2020 general election date, disclosing only in-kind contributions from Nelson to the Campaign, which included: (1) \$10,836 for an in-kind contribution to Minuteman Press for printing and postage for a mailer; (2) \$10,389 in total for three in-kind contributions to the Bellingham Herald for newspaper and political advertising; (3) \$5,539 for in-kind contributions for political advertisements that ran on Comcast Cable.

James W Nelson would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding (Brief Enforcement Hearing) being scheduled by Public Disclosure Commission (PDC) staff.

Therefore, in lieu of PDC staff scheduling a Brief Enforcement Hearing, James W Nelson is completing this

James W Nelson
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Statement of Understanding

Statement of Understanding, and enclosing a check or money order in the amount of \$150 as a penalty payment to resolve this matter.

The \$150 penalty being assessed against James W Nelson is for one acknowledged violation of RCW 42.17A.235 for failing to timely file the 21-Day Pre-General Election C-4 reports disclosing in-kind contributions made to the Campaign for political advertisements and other campaign services. The \$150 penalty is being assessed in accordance with the Penalty Schedule, and the mitigating and aggravating factors adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143.

James W Nelson understands that by completing this Statement of Understanding, he acknowledges one violation of RCW 42.17A.235 as set forth above and is waiving his right to a hearing in this matter.

James W Nelson further understands that this will resolve the issue of failing to timely file the 21-Day Pre-General Election C-4 report.

s/ 
signed by James W Nelson

2/5/21
Date Signed

Please make your check or money order payable to the "**Washington State Treasurer**" and be sure to include the PDC Case number in the memorandum field, and print, sign and mail this Statement of Understanding along with your payment to:

Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908