

State of Washington  
PUBLIC DISCLOSURE COMMISSION

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**Public Disclosure Commission Statement of Understanding**  
**Jeannette Twitty**  
**PDC Case 141053**

I, Jeannette Twitty, hereby acknowledge that, while a 2023 candidate running for election to the position of Port Commissioner for Port of Tacoma, I violated: RCW 42.17A.235 and .240 by failing to accurately file *Monetary Contribution Reports* (C-3 reports) and *Summary Full Campaign Contribution and Expenditure Reports* (C-4 reports) disclosing contributions and expenditures for election year 2023.

RCW 42.17A.235 and .240 require political committees participating in an election and under the Full Reporting option to timely and accurately file C-3 and C-4 reports.

RCW 42.17A.220(4) provides, in pertinent part, that: "Accumulated unidentified contributions, other than those made by persons whose names must be maintained on a separate and private list by a political committee's treasurer pursuant to RCW 42.17A.240(2), in excess of one percent of the total accumulated contributions received in the current calendar year, or three hundred dollars, whichever is more, may not be deposited, used, or expended, but shall be returned to the donor if his or her identity can be ascertained." The \$300 limit specified in RCW 42.17A.220(4) has been adjusted to \$500. WAC 390-05-400.

The facts are as follows:

- On a C-3 report submitted 6/26/23, Jeannette Twitty's candidate campaign (the "Respondent") disclosed an anonymous contribution amount of \$200 (see [report 110154871](#)). According to its amended reports, the campaign's total accumulated contributions as of 6/26/23 were \$1,317, one percent of which was \$13.17. Therefore, the total accumulated contributions limit permitted by the campaign as of 6/26/23 was \$500, which was not exceeded by the \$200 anonymous contribution reported on 6/26/23. The campaign amended the C-3 report filed 6/26/23 multiple times and the final amendment,


dated 1/29/24, shows the anonymous contribution was reduced from \$200 to \$100 ([report 110199029](#)).

- On a C-3 report submitted 7/24/23, the Respondent disclosed an anonymous contribution amount of \$500 (see [report 110161580](#)), for an aggregate total of \$700 in accumulated anonymous contributions. According to its amended reports, the campaign's total accumulated contributions as of 7/24/23 were \$2,269, one percent of which was \$22.69. Therefore, the total accumulated contributions limit permitted by the campaign as of 7/24/23 was \$500, which was exceeded by \$200 based on the reported aggregate total of \$700. The campaign amended the C-3 report filed 7/24/23 once and the amendment, dated 1/29/24, shows the anonymous contribution was reduced from \$500 to \$392 (see [report 110199031](#)).
- After correcting its contributions on C-3 reports, the campaign's total accumulated anonymous contributions for election year 2023 were \$492, and therefore below the \$500 threshold. The campaign also amended its C-4 reports for June and July of 2023 to reflect changes made to its C-3 reports.
- The campaign took over five months to fully correct their reports disclosing contributions that were originally misclassified as anonymous, which deprived the public of accurate and timely information before and after the General election.

I would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding. Therefore, in lieu of PDC staff scheduling a hearing, I am entering into this *Statement of Understanding* (SOU) to resolve the issue of incorrectly classifying monetary contributions as anonymous contributions on C-3 and C-4 reports for election year in 2023, in violation of RCW 42.17A.235 and .240.

In accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143, I agree to the assessment of a \$200 penalty for acknowledged violations of RCW 42.17A.235 and .240.

I understand that, by completing this SOU, I acknowledge the violations of Chapter 42.17A RCW and Title 390 WAC set forth above and waive my right to a hearing in this matter. I further understand that signing this SOU and returning it to the PDC with a payment for the \$200 civil penalty will resolve the inaccurate disclosure of contributions indicated above.

  
Jeannette Twitty

3/28/24  
Date Signed

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Please make your check or money order payable to the **“Washington State Treasurer”** and be sure to include the PDC Case Number (141053) in the memorandum field.

Kindly mail or deliver this SOU and your payment to one of the following addresses by no later than **April 2, 2024**.

Regular mail:

**Public Disclosure Commission  
PO Box 40908  
Olympia, WA 98504-0908**

Overnight mail or in-person delivery:

**Public Disclosure Commission  
711 Capitol Way S, STE 206  
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