

Respondent Name
Jessica Wadhams
Complainant Name
Glen Morgan
Complaint Description
<p>Glen Morgan reported via the portal (Thu, 3 Aug 2023 at 1:46 PM)</p> <p>To whom it may concern,</p> <p>It has come to my attention that Jessica Wadhams in her failed 2021 campaign for Lake Stevens City Council has violated Washington State’s campaign finance laws (RCW 42.17A). The details are as follows:</p> <p>1) Attempt to conceal campaign expenditures from the public (Violation of RCW 42.17A.235, RCW 42.17A.240)</p> <p>I was randomly skimming the PDC website today while I waited for someone to show up for my next meeting, and I found another failed politician who apparently willfully violated Washington State’s campaign finance laws while simultaneously losing a political campaign. As PDC staff knows from my past complaints, this is not unusual, but we have campaign transparency laws for a reason in this state (at least since 1972), and there really is no excuse for a well-funded political campaign like this to just openly violate those same laws.</p> <p>Specifically, some expenditures for the Wadhams failed 2021 campaign for Lake Stevens City Council clearly were concealed from the public. For example, nowhere in her C4 (expenditure) reports did she ever report the \$200 filing fee paid to the secretary of state as required by law. There is no good reason to conceal this information from the public. This has been concealed from the public. For clarification of the need to report this expenditure, I’ve attached the relevant AGO (AGO 1974:16 attached) which clearly spells this out as it applies in this specific example.</p> <p>There may be additional secret expenditures by this political campaign which were also concealed from the public. Rarely is the lawbreaking restricted to just one violation. PDC staff may need to do a complete forensic audit of this campaign to see what else was concealed from the public.</p> <p>2) Total failure to provide even bare minimum details on expenditures as required by law (Violation of RCW 42.17A.235, RCW 42.17A.240, WAC 390-16-037)</p> <p>Some political campaigns can make minor mistakes and miss a few details as required by statute in the course of a major campaign. While this is a strict liability statute, meaning that even de minimis violations are still legal violations, this campaign didn’t even come close to trying to comply. Nearly every expenditure by this campaign failed to provide even the bare minimum details as required by statute. I’ll provide just a handful of specific examples here:</p> <ul style="list-style-type: none"> • PDC C4 Report # 110055433, (attached) on 9/22/2021 - \$792.44 to Capital City Press for “lit” nothing more. Clearly a violation of the law, specifically WAC 390-16-037 example B. • PDC C4 Report # 110055433, (attached) on 9/22/2021 - \$359.66 to Capital City Press again for “lit” nothing more. Clearly a violation of the law, specifically WAC 390-16-037 example B. • PDC C4 Report # 110055433, (attached) on 10/07/2021 - \$939.58 to Johnson Cox company this time again for “lit” nothing more. Clearly a violation of the law, specifically WAC 390-16-037 example B.

- **PDC C4 Report # 110055433**, (attached) on 9/26/2021 - \$195.85 to Amazon this time for “postcards” nothing more. How many? **Clearly a violation of the law, specifically WAC 390-16-037 example B.**
- **PDC C4 Report # 110049272**, (attached) on 7/29/2021 - \$792.44 to Capital City Press for “signs” this time, nothing more. What type or size of signs? How many? Again, **clearly a violation of the law, specifically WAC 390-16-037 example B.**
- **PDC C4 Report #110071347**, (attached) on 10/22/2021 - \$425.92 to Capital City Press for “flyers” this time, nothing more. What type of flyers? How many? Again, **clearly a violation of the law, specifically WAC 390-16-037 example B.**
- **PDC C4 Report # 110049274**, (attached) on 6/03/2021 - \$497.04 in-kind contribution by “Jesse Jorstad” for “raffle prizes” this time, nothing more. What type of prizes? From whom were the prizes purchases? What is the identity, address and other required details for this in-kind contribution. Again, **clearly a violation of the law.**

Again, **I am just using a sampling of the violations of this specific type of lawbreaking by this campaign. There are more than just the examples I have easily provided above** (and proven by the C4s I have attached for staff reference). This campaign has a lot of work to do to get back into even marginal compliance with Washington State’s campaign finance laws.

3) Illegal contribution to the Washington State Democratic Party, Misuse of Campaign funds (Violation of RCW 42.17A.430(8))

In this specific example of lawbreaking, the Jessica Wadhans campaign illegally transferred campaign funds to a political committee, namely, the Washington State Democratic Party. This violates state law as referenced above. Wadhans illegally transferred \$221.42 on 4/21/21 to the Washington State Democratic Party and called it a “donation” (See **PDC C4 Report # 110021193, attached**).

In recognition that I can’t be certain which PDC staff investigator is assigned to this case, and many staff are relatively new to the PDC, I will highlight several similar campaign finance cases which have been resolved by the PDC or the AG in the past which are identical in nature and fact pattern to this most recent Lisa Brown violation:

Example 1 – PDC Enforcement Case #8928 – Jim Cooper, Olympia City Councilman, Thurston County Commissioner Candidate – Also spent campaign funds on a similar program with the Thurston County Democrats (in fact, almost identical to the Brown violation). This resulted in formal sanctions from the PDC at the time (See letter attached) and also a lawsuit filed by the AG (settlement and complaint attached for reference).

Example 2 – PDC Enforcement Case #8734 – Michael Waite, Republican candidate for Washington State Treasurer – This one was the same legal violation, although more minor than the egregious Brown violation documented in this complaint.

I will also point out that PDC staff should have received a complaint from me against a Spokane City Mayor candidate with a similar violation recently. This is well established in both statute and case enforcement that these types of illegal transfers – whether called a “donation” or something else are illegal.

This slipshod campaign’s violations are so egregious, I’m wondering how I missed this one for so long. I need to stop being so lazy and get more diligent about reviewing these cases.

Let me know if you need any more information on this one.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

A politician, even one who loses a political race, should still be expected to comply with Washington's campaign finance laws. They can't just phone it in or pretend to care when they clearly don't care about following the law themselves.

List of attached evidence or contact information where evidence may be found

All referenced in the body of the complaint and clearly attached as exhibits as required for staff assistance and clarity

List of potential witnesses

The candidate and their "consultant" who clearly didn't consult very well.

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
 110055433
 10-14-2021

Candidate or Committee Name (Do not abbreviate. Include full name)

(Friends of Jessica Wadhams)

Mailing Address

3519 Catherine Dr.

City

Lake Stevens, WA

Zip + 4

98258

Office Sought (Candidates)

CITY COUNCIL MEMBER

Election Date

2021

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?

Report Period Covered

From (last C-4)

To (end of period)

Final Report?

Yes No **X**

09/01/21

10/11/21

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$9,815.57
2. Cash received (From line 2, Schedule A)	\$	\$1,940.03
3. In kind contributions received (From line 1, Schedule B)		\$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$1,940.03
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$11,755.60
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		\$5,761.93
11. Total cash expenditures (From line 4, Schedule A)		\$2,424.80
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$2,424.80
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$8,186.73

CANDIDATES ONLY

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:

(360) 386-5952

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$3,568.87
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$3,568.87

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature

Date

JESSICA WADHAMS

10/14/21

Treasurer's Signature

Date

Trevor Wadhams

10/14/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

(Friends of Jessica Wadhams)

09/01/21

10/11/21

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
10/11/2021	\$1,940.03					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$1,940.03**

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE
DEFINITIONS
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$137.27
09/22/21	CAPITAL CITY PRESS INC 2975 37th ave s tunwater, WA 98512	G	lit	\$792.44
09/22/21	CAPITAL CITY PRESS INC 2975 37th ave s tunwater, WA 98512	G	lit	\$359.66
09/26/21	AMAZON 410 terry ave seattle, WA 98109	G	postcards	\$195.85
10/07/21	JOHNSON COX COMPANY INC 726 pacific ave tacoma, WA 98402	L	lit	\$939.58

Total from attached pages \$ **\$0.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$2,424.80**

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

Candidate or Committee Name (Do not abbreviate. Include full name)

(Friends of Jessica Wadhams)

Mailing Address

3519 Catherine Dr.

City

Lake Stevens, WA

Zip + 4

98258

Office Sought (Candidates)

CITY COUNCIL MEMBER

Election Date

2021

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?

Report Period

From (last C-4)

To (end of period)

Final Report?

Covered

07/27/21

08/31/21

Yes No **X**

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$7,160.55
2. Cash received (From line 2, Schedule A)	\$	\$2,605.02
3. In kind contributions received (From line 1, Schedule B)		\$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$2,605.02
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$9,765.57
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		\$4,913.91
11. Total cash expenditures (From line 4, Schedule A)		\$848.02
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$848.02
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$5,761.93

CANDIDATES ONLY

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:

(360) 386-5952

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$4,003.64
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$4,003.64

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature

Date

JESSICA WADHAMS

09/23/21

Treasurer's Signature

Date

Trevor Wadhams

09/23/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

(Friends of Jessica Wadhams)

07/27/21

08/31/21

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
08/31/2021	\$2,605.02					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$2,605.02**

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE
DEFINITIONS
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$19.62
07/29/21	CAPITAL CITY PRESS INC 2975 37th ave s tunwater, WA 98512	G	signs	\$828.40

Total from attached pages \$ **\$0.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$848.02**

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE

110071347

01-29-2022

Candidate or Committee Name (Do not abbreviate. Include full name)

(Friends of Jessica Wadhams)

Mailing Address

3519 Catherine Dr.

City

Lake Stevens, WA

Zip + 4

98258

Office Sought (Candidates)

CITY COUNCIL MEMBER

Election Date

2021

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?

Report Period Covered

From (last C-4)

10/12/21

To (end of period)

10/25/21

Final Report?

Yes No **X**

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$11,755.60
2. Cash received (From line 2, Schedule A)	\$	\$900.02
3. In kind contributions received (From line 1, Schedule B)		\$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$900.02
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$12,655.62
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		\$11,660.74
11. Total cash expenditures (From line 4, Schedule A)		\$525.92
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$525.92
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$12,186.66

CANDIDATES ONLY

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:

(360) 386-5952

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$468.96
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$468.96

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature

Date

JESSICA WADHAMS

01/29/22

Treasurer's Signature

Date

Trevor Wadhams

01/29/22

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

(Friends of Jessica Wadhams)

10/12/21

10/25/21

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
10/25/2021	\$900.02					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$900.02**

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

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DEFINITIONS
ON NEXT PAGE

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N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
10/22/21	CAPITAL CITY PRESS INC 2975 37th ave s tunwater, WA 98512	L	flyers	\$525.92

Total from attached pages \$ **\$0.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$525.92**

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
 110049274
 AMENDS
 110039026
 09-23-2021

Candidate or Committee Name (Do not abbreviate. Include full name)

(Friends of Jessica Wadhams)

Mailing Address

3519 Catherine Dr.

City

Lake Stevens, WA

Zip + 4

98258

Office Sought (Candidates)

CITY COUNCIL MEMBER

Election Date

2021

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?

Report Period Covered

From (last C-4)

To (end of period)

Final Report?

Yes No **X**

06/01/21

07/12/21

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$5,548.51
2. Cash received (From line 2, Schedule A)	\$	\$1,140.00
3. In kind contributions received (From line 1, Schedule B)		\$497.04
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$1,637.04
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$7,185.55
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		\$3,223.95
11. Total cash expenditures (From line 4, Schedule A)		\$1,192.92
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$497.04
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$1,689.96
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$4,913.91

CANDIDATES ONLY

Name not

Won

Lost

Unopposed

on ballot

Primary election

☐
☐
☐
☐

General election

☐
☐
☐
☐

Treasurer's Daytime Telephone No.:

(360) 386-5952

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$2,271.64
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$2,271.64

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature

Date

JESSICA WADHAMS

09/23/21

Treasurer's Signature

Date

Trevor Wadhams

09/23/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

(Friends of Jessica Wadhams)

06/01/21

07/12/21

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
06/14/2021	\$270.00					
06/12/2021	\$820.00					
06/29/2021	\$50.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$1,140.00**

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE
DEFINITIONS
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$70.42
06/30/21	TR GRAPHICS 13902 Meadow Road everett, WA 98208	G	graphics	\$60.00
06/15/21	TR GRAPHICS 13902 Meadow Road everett, WA 98208	G	graphics	\$62.50
06/09/21	IMPACT PUBLIC AFFAIRS 600 1st ave. suite 411 seattle, WA 98104	G	consultant fee	\$1,000.00

Total from attached pages \$ **\$0.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$1,192.92**

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
06/03/21	JESSE JORSTAD 12509 5th Pl NE Lake Stevens, WA 98258	raffle prizes	\$497.04	\$497.04		X	self Lake Stevens WA ARTIST
		TOTAL THIS PAGE	\$497.04				

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
 110021193
 05-23-2021

Candidate or Committee Name (Do not abbreviate. Include full name)

(Friends of Jessica Wadhams)

Mailing Address

3519 Catherine Dr.

City

Lake Stevens, WA

Zip + 4

98258

Office Sought (Candidates)

CITY COUNCIL MEMBER

Election Date

2021

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?

Report Period Covered

From (last C-4)

To (end of period)

Final Report?

Yes No **X**

04/01/21

04/30/21

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$1,123.51
2. Cash received (From line 2, Schedule A)	\$	\$3,545.00
3. In kind contributions received (From line 1, Schedule B)		\$385.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$3,930.00
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	\$0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		\$5,053.51
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		\$984.12
11. Total cash expenditures (From line 4, Schedule A)		\$1,236.80
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$385.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$1,621.80
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$2,605.92

CANDIDATES ONLY

Name not

	Won	Lost	Unopposed	on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:

(360) 386-5952

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	\$2,447.59
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$2,447.59

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature

Date

JESSICA WADHAMS

05/23/21

Treasurer's Signature

Date

Trevor Wadhams

05/23/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

(Friends of Jessica Wadhams)

04/01/21

04/30/21

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
04/02/2021	\$1,000.00					
04/10/2021	\$2,470.00					
04/15/2021	\$75.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$3,545.00**

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE
DEFINITIONS
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$15.38
04/21/21	WA STATE DEMOCRATS PO Box 4027 Seattle, WA 98194		donation to WSD	\$221.42
04/30/21	IMPACT PUBLIC AFFAIRS 600 1st ave. suite 411 seattle, WA 98104		campaign consultant fee	\$1,000.00

Total from attached pages \$ **\$0.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$1,236.80**

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
04/07/21	STEPHANIE STEELE 9512 16th Place NE lake stevens, WA 98258	\$25 gift card to Black Coffee company for my kickoff	\$25.00	\$75.00	X		boeing seattle WA PROGRAM MANAGER
04/07/21	LINDSAY PRICE 11519 22nd st se lake stevens, WA 98258	Photography package to winner of raffle	\$360.00	\$505.50	X		self lake stevens WA PHOTOGRAPHER
		TOTAL THIS PAGE	\$385.00				



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[Home](#) > ELECTIONS -- INITIATIVE NO. 276 -- FILING FEES AS REPORTABLE EXPENDITURES UNDER INITIATIVE NO. 276

Attorney General Slade Gorton

**ELECTIONS -- INITIATIVE NO. 276 -- FILING FEES AS REPORTABLE EXPENDITURES
UNDER INITIATIVE NO. 276**

A candidate for elective office who is required to pay a filing fee under RCW 29.18.050 must treat that fee as an expenditure under the campaign expenditure reporting requirements of Initiative No. 276.

July 29, 1974

Honorable Kenneth Kennedy
Chairman, Washington Public
Disclosure Commission
Insurance Building
Olympia, Washington 98504

Cite as: AGO 1974 No. 16

Dear Sir:

By letter previously acknowledged the commission has requested our opinion on a question which we paraphrase as follows:

Must a candidate for elective office who is required to pay a filing fee under RCW 29.18.050 treat that fee as an expenditure under the campaign expenditure reporting requirements of Initiative No. 276?

We answer this question in the affirmative for the reasons set forth in our analysis.

ANALYSIS

Your question involves the campaign financing provisions of Initiative No. 276 (now codified as chapter 42.17 RCW), insofar as they relate to expenditures by candidates or [[Orig. Op. Page 2]] political committees.^{1/}

This new disclosure law, which was approved by the voters at the November, 1972, state general election, contains several provisions relating to the reporting of political campaign

expenditures. First, § 8 (now codified as RCW 42.17.080) provides that when a campaign treasurer is designated by a candidate or political committee there must be filed a "report of all contributions received and expenditures made in the election campaign prior to that date." (Emphasis supplied.) Then, RCW 42.17.090 (codifying § 9) sets out the general requirements for the reporting of such expenditures. Among the items of information that must be reported pursuant to this section are "the name and address of each person to whom an expenditure was made in the aggregate amount of \$25.00 or more, and the amount, date and purpose of each such expenditure." (RCW 42.17.090(1)(f).) Further, subsection (1)(g) of RCW 42.17.090 requires the continual reporting of the total sum of a candidate's campaign expenditures.

The term "expenditure" itself is defined in § 2 of the act (RCW 42.17.020(12)) as meaning:

". . . a payment, contribution, subscription, distribution, loan, advance, deposit, or gift of money or anything of value, and includes a contract, promise, or agreement, [[Orig. Op. Page 3]] whether or not legally enforceable, to make an expenditure. The term 'expenditure' also includes a promise to pay, a payment or a transfer of anything of value in exchange for goods, services, property, facilities or anything of value for the purpose of assisting, benefiting or honoring any public official or candidate, or assisting in furthering or opposing any election campaign."

In other words, an expenditure, for the purposes of the act, includes any transfer or payment of anything of value which is made for the purpose of assisting a public official or candidate in furthering his election campaign. This leads us to your present question; i.e., whether the statutory filing fee provided for in RCW 29.18.050 constitutes such an "expenditure."

Insofar as is here material, this statute provides as follows:

"A fee of one dollar must accompany each declaration of candidacy for a precinct office without salary; a fee of ten dollars for any office with a compensation attached of one thousand dollars per annum or less; a fee equal to one percent of the annual compensation for any office with a compensation attached of more than one thousand dollars per annum."

The significance of this filing fee will readily be seen when the foregoing statute is read in conjunction with RCW 29.18.030, which provides that:

"The name of no candidate shall be printed upon the official ballot used at a state primary, unless not earlier than the last Monday of July nor later than the next succeeding Friday, a declaration of candidacy is filed in the form hereinafter set forth . . ."

Although situated in a chapter of the election code dealing with partisan primaries and elections, these two statutes (RCW 29.18.030 and 29.18.050) apply not only to elections for partisan offices but, as well, to elections for nonpartisan offices under chapter 29.21 RCW. See, RCW 29.21.020. In [[Orig. Op. Page 4]] AGO 1974 No. 12 [[to A. Ludlow Kramer, Secretary of State on June 28, 1974]], copy enclosed, however, we recently advised that the filing fee requirement of RCW 29.18.050 is no longer constitutionally enforceable, in view of a recent United States Supreme Court decision, in the case of indigent persons who are financially unable to pay the fee required for the particular office they are seeking.

With this exception, however, it is readily to be seen that for the purposes of the election law, a person seeking election to a particular office for which a filing fee is prescribed may not become an official candidate unless he has paid the required filing fee in conjunction with the filing of his

declaration of candidacy. From this it follows, in our opinion, that the filing fee does constitute an "expenditure," for the purposes of Initiative No. 276, in view of the definition contained in § 2 (RCW 42.17.020(12)),supra.

In simplest terms, this payment (in those cases in which it is required) is a necessary part of the candidate's financial outlay if he is to have his name appear on the ballot and, in that manner, become eligible to be elected to the office he is seeking. Moreover, the payment is very clearly a transfer of something of value and it cannot be doubted that it is for the purpose of assisting the candidate and furthering his election campaign. Payment of the filing fee is thus precisely within the broad definition of "expenditure" as set forth above. We must therefore answer your question, as above paraphrased, in the affirmative.

We trust the foregoing will be of assistance to you.

Very truly yours,

SLADE GORTON
Attorney General

JAMES VACHE
Assistant Attorney General

***** FOOTNOTES *****

1/The terms "candidate" and "political committee" are defined in RCW 42.17.020(5) and (22), respectively, as follows:

"(5) 'Candidate' means any individual who seeks election to public office. An individual shall be deemed to seek election when he first:

"(a) Receives contribution or makes expenditures or reserves space or facilities with intent to promote his candidacy for office; or

"(b) Announces publicly or files for office.

". . .

"(22) 'Political committee' means any person (except a candidate or an individual dealing with his own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition."



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111
Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

December 16, 2016

jim@electjimcooper.com

Subject: PDC Complaint 8928 - Formal Written Warning

Dear Mr. Cooper:

Enclosed is a copy of a letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission on October 17, 2016. The complaint made fifty allegations that you may have violated RCW 42.17A.205, .235, .240, and .435 by failing to report campaign donations and spending as required by statute, and for illegally donating to a political party from campaign funds during your 2016 race for Thurston County Commission. As noted in the letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

Your campaign appears to have committed a minor violation of RCW 42.17A.235 for failing to report one in-kind contribution of \$46.08, and a technical violation of RCW 42.17A.435 for making prohibited contributions of \$381 to a party organization from campaign funds.


Pursuant to WAC 390-37-060, I am issuing this Formal Written Warning. You have agreed to either have the Thurston County Democratic Central Committee reimburse \$381 to your campaign, or you will reimburse your campaign from personal funds. Please confirm that the campaign reimbursement has been made by February 17, 2017 (approximately 60 days from today).

If you are found to be out of compliance with this agreement after February 17, 2016, letter, and have not made an acceptable arrangement to return the funds, a Hearing Notice will be issued and you will have to appear at a Brief Adjudicative Proceeding before the Chair of the Public Disclosure Commission.

If there are future violations of PDC laws or rule, the Commission will consider this Formal Written Warning in deciding on further Commission action. Should you have questions about PDC

Complaint 8928 you may contact or contact Kurt Young, toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,


Evelyn Fielding Lopez
Executive Director

Enclosure: Letter to Complainant

FILED

DEC 19 2016

Superior Court
Linda Myhre Enlow
Thurston County Clerk

COPY

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

JAMES M. COOPER, Jr.,
individually, and FRIENDS OF JIM
COOPER, a political committee,

Defendants.

NO. 16-2-04960-34

COMPLAINT FOR CIVIL
PENALTIES AND FOR
INJUNCTIVE RELIEF FOR
VIOLATIONS OF
RCW 42.17A

I. NATURE OF ACTION

The State of Washington (State) brings this action to enforce the state's campaign finance disclosure law, RCW 42.17A. The State alleges that Defendants, JAMES M. COOPER, Jr. and FRIENDS OF JIM COOPER, a political committee, violated provisions of RCW 42.17A by 1) concealing and failing to disclose the true identity of contributors to the Thurston County Democratic Central Committee, 2) by improperly transferring campaign contributions to another political committee, and 3) using campaign funds for personal use. The State seeks relief under RCW 42.17A.750 and .765, including penalties, costs and fees, and injunctive relief.

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2.3 Defendant FRIENDS OF JIM COOPER (Campaign) is a political committee registered by Defendant Cooper as his authorized candidate committee on November 13, 2015. As such, the Campaign was expected to comply with the provisions of RCW 42.17A.

3.1 This Court has subject matter jurisdiction over the present case, in accordance with RCW 42.17A. The Attorney General has authority to bring this action pursuant to RCW 42.17A.765.

3.2 This Court has personal jurisdiction over Defendants, who are either a resident of the State of Washington or a political committee registered and reporting in the State of Washington. Additionally, the acts complained of here took place in Thurston County in the State of Washington.

3.3 Venue is proper in this Court pursuant to RCW 4.12.020(1).

4.1 RCW 42.17A declares as a matter of public policy “[t]hat political campaign and lobbying contributions and expenditures be fully disclosed to the public and that secrecy is to be avoided.” RCW 42.17A.001(1). Further the statute provides that the provisions of the law “shall be liberally construed to promote complete disclosure of all information respecting the financing of political campaigns. . .”.

1 Finally, RCW 42.17A declares as a matter of public policy “[t]hat the people have the
2 right to expect from their elected representatives at all levels of government the utmost
3 of integrity, honesty, and fairness in their dealings.” RCW 42.17A.001(2).

4 4.2 Washington’s campaign finance law also requires a campaign to timely
5 report expenditures of a candidate’s campaign. RCW 42.17A.235, .240(8);
6 RCW 42.17A.005(20). The PDC form to report expenditures is called a “Summary,
7 Full Report Receipts and Expenditures” and is a Form “C4.”

8 4.3 Washington’s campaign finance law requires a candidate for public office
9 to be responsible for the expenditures of his or her campaign. “No expenditures may be
10 made or incurred by any candidate or political committee unless authorized by the
11 candidate or the person or persons named on the candidate’s or committee’s registration
12 form.” RCW 42.17A.425.

13 4.4 A candidate may not dispose of campaign contributions without
14 restriction. Under RCW 42.17A.430, “No candidate or authorized committee may
15 transfer funds to any other candidate or other political committee.”

16 4.5 Under RCW 42.17A.435, a person may not conceal the identity of the
17 person on whose behalf a contribution is made. Additionally, under
18 RCW 42.17A.470(1), “[a] person, other than an individual, may not be an intermediary
19 or an agent for a contribution.” Under RCW 42.17A.445, personal use of campaign
20 funds is prohibited except in specific circumstances, none of which is relevant here.

21 4.6 Defendant Cooper formally declared his candidacy for Thurston County
22 Board of Commissioners by filing Public Disclosure Commission Candidate
23 Registration Form C-1 on November 13, 2015.

24 4.7 On October 17, 2016, the Attorney General’s Office, Thurston County
25 Prosecuting Attorney’s Office, and state Public Disclosure Commission received a
26 citizen action notice (Notice) from complainant Glen Morgan. In his Notice, Morgan

1 asserted that Defendants violated state law by using campaign funds to make
2 contributions to a political party.

3 4.8 Prior to May 7, 2016, the Thurston County Democratic Central
4 Committee announced a fundraising event to support the local political party's political
5 activities including contributions to other democratic candidates. The event was
6 referred to as the "Kennedy Dinner." Relevant to this litigation, the cost to attend the
7 event was at least \$100 per ticket. This cost covers the fair market value of the actual
8 dinner and a contribution to the Thurston County Democratic Central Committee.
9 According to Defendants, the estimated fair market value of the dinner is \$76.19.

10 4.9 Defendant Cooper invited 14 individuals to attend the event and sit at two
11 tables Defendants wanted to sponsor. Sixteen individuals attended the event (which
12 included Defendant Cooper and his spouse) and were associated with the Defendants'
13 two sponsored tables.

14 4.10 Four of the 16 attendees identified above purchased their event ticket
15 directly from the Thurston County Democratic Central Committee.

16 4.11 On May 7, 2016, Defendant Cooper authorized an expenditure of \$1,300
17 from campaign contributions Defendants received to purchase the additional 12 event
18 tickets. Defendants reports this expenditure to the Thurston County Democratic Central
19 Committee on their June 10, 2016 C4 report.

20 4.12 On information and belief, of the 12 additional individuals who attended
21 using Defendants' purchased tickets, Defendants state that certain individuals
22 reimbursed Defendants to defray the cost of event tickets which included a campaign
23 contribution to the Thurston County Democratic Central Committee.

24 4.13 Defendants used campaign funds to purchase tickets for Defendant
25 Cooper and his spouse to attend the event.

26 ///

1 4.14 To the extent that individuals contributed to the Campaign to cover the
2 cost of their ticket price, but their contributions did not cover the fair market value of
3 the dinner, Defendants used campaign funds to pay both the additional dinner cost as
4 well as the contribution to the Thurston County Democratic Central Committee.

5 **V. CLAIMS**

6 The State re-alleges and incorporates by reference all the factual allegations
7 contained in the preceding paragraphs, and based on those allegations, makes the
8 following claims:

9 5.1 First Claim: The State reasserts the factual allegations made above and
10 further asserts that Defendants in violation of RCW 42.17A.435 and .470 concealed and
11 failed to disclose the true identity of contributors to the Thurston County Democratic
12 Central Committee when Defendants purchased tickets to the Thurston County
13 Democratic Central Committee's pre-election fundraising dinner in Defendants' name
14 and received reimbursement from those contributors for the tickets.

15 5.2 Second Claim: The State reasserts the factual allegations made above and
16 further asserts that Defendants in violation of RCW 42.17A.430(8) improperly
17 transferred Defendants' campaign funds to another political committee.

18 5.3 Third Claim: The State reasserts the factual allegations made above and
19 further asserts that Defendants in violation of RCW 42.17A.445 improperly used
20 campaign funds for personal use including partial payment of the fair market value of
21 the dinner as well as contribution to the Thurston County Democratic Central
22 Committee's pre-election fundraising dinner.

23 5.4 Fourth Claim: The State reasserts the factual allegations made above and
24 further asserts that the Defendants' actions stated in the above claims were negligent
25 and/or intentional.

26 ///

1 **VI. REQUEST FOR RELIEF**

2 WHEREFORE, the State requests the following relief as provided by law:

3 6.1 For such remedies as the court may deem appropriate under
4 RCW 42.17A.750, including but not limited to imposition of a civil penalty, all to be
5 determined at trial;

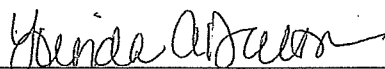
6 6.2 For all costs of investigation and trial, including reasonable attorneys'
7 fees, as authorized by RCW 42.17A.765(5);

8 6.3 For temporary and permanent injunctive relief, as authorized by
9 RCW 42.17A.750(1)(h); and

10 6.4 For such other legal and equitable relief as this Court deems appropriate.

11 DATED this 19th day of December, 2016.

12 ROBERT W. FERGUSON
13 Attorney General

14 
15 LINDA A. DALTON, WSBA No. 15467
16 Senior Assistant Attorney General
17 WALTER M. SMITH, WSBA No. 46695
18 Assistant Attorney General
19 Attorneys for Plaintiff State of Washington
20
21
22
23
24
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26

FILED

JUN 15 2018

Superior Court
Linda Myhre Enlow
Thurston County Clerk

☐ EXPEDITE
☐ No Hearing Set
☒ Trial is Set
Date: Monday August 20, 2018
Time: 8:30 a.m.
Judge John C. Skinder

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

NO. 16-2-04960-34

Plaintiff,

STIPULATION AND JUDGMENT

v.

JAMES M. COOPER, JR., individually,
and FRIENDS OF JIM COOPER, a
political committee,

EX PARTE

Defendants.

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: Defendants JAMES M. COOPER, JR., individually,
and FRIENDS OF JIM COOPER, a political committee
- C. PRINCIPAL JUDGMENT: \$1,125.00
- D. INTEREST: No prejudgment interest is owed. Principal judgment
amount(s) due and owing shall not bear interest unless
the principal judgment is unpaid by the due date specified
herein
- E. COSTS AND FEES: None
- F. ATTORNEYS FOR JUDGMENT CREDITOR ROBERT W. FERGUSON
Attorney General
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
- G. ATTORNEY FOR JUDGMENT DEBTOR JOHN A. KESLER III, WSBA No. 39380
Bean, Gentry, Wheeler & Peternell PLLC

STIPULATION AND
AGREED JUDGMENT

1

ATTORNEY GENERAL OF WASHINGTON
Campaign Finance Unit
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200

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STIPULATION

The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE) and Defendants, JAMES M. COOPER, JR., individually, and FRIENDS OF JIM COOPER, a political committee, desiring to resolve claims arising out of the State's First Amended Complaint and the citizen action notices filed to date regarding Defendants' 2016 election campaign, hereby enter into the following stipulation:

1. Defendants JAMES M. COOPER, JR., individually, and FRIENDS OF JIM COOPER, a political committee, agree to pay an assessed civil penalty in the amount of \$1,125.00 for their violations of RCW 42.17A as alleged in the State's First Amended Complaint including failing to timely file and disclose contributions and expenditures, including debts; failing to disclose the true identity of contributors to a political committee; improperly transferring campaign contributions; and making personal use of campaign funds.
2. Defendants JAMES M. COOPER, JR., individually, and FRIENDS OF JIM COOPER, a political committee, agree to pay the State the civil penalty (\$1,125.00) within 90 days from the date of the entry of the Judgment.

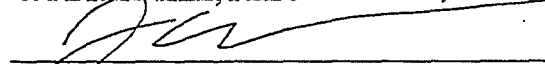
DATED this 12th day of June, 2018.

ROBERT W. FERGUSON
Attorney General



LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
Attorneys for Plaintiff

BEAN, GENTRY, WHEELER
& PETERNELL, PLLC



JOHN A. KESLER III, WSBA No. 39380
Attorney at Law
Attorney for Defendants

JUDGMENT

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. Plaintiff, STATE OF WASHINGTON, appearing through its attorneys of record, ROBERT W. FERGUSON, Attorney General, and LINDA A. DALTON, Senior Assistant Attorney General, and Defendants JAMES M. COOPER, JR., individually, and FRIENDS OF

1 JIM COOPER, a political committee, appearing through their attorney, JOHN A. KESLER III,
2 Attorney at Law, apprised the Court of their agreement to the entry of this judgment for the
3 purpose of settling and compromising this action brought under RCW 42.17A. The Court,
4 having reviewed the records and files herein, and having found the settlement to be a just and
5 proper resolution of this matter, and being otherwise fully advised in the premises, hereby
6 ORDERS as follows:

7 1. Defendants JAMES M. COOPER, JR., individually, and FRIENDS OF JIM COOPER, a
8 political committee, are hereby assessed a civil penalty, for their violations of the
9 provisions of RCW 42.17A as alleged in the State's First Amended Complaint and outlined
10 in the Stipulation, in the amount of \$1,125.00 payable to the State of Washington.

11 3. Defendants JAMES M. COOPER, JR., individually, and FRIENDS OF JIM COOPER, a
12 political committee, shall pay the State the civil penalty (\$1,125.00) within 90 days from
13 the date of the entry of the Judgment.

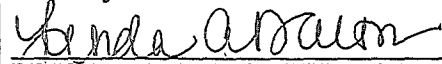
14 DONE IN OPEN COURT this 15 day of June, 2018.

15 **JOHN C. SKINDER**

16 JUDGE JOHN C. SKINDER

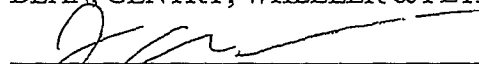
17 PRESENTED BY:

18 ROBERT W. FERGUSON
19 Attorney General

20 
21 LINDA A. DALTON, WSBA No. 15467
22 Senior Assistant Attorney General
23 Attorneys for Plaintiff State of Washington

24 And:

25 BEAN, GENTRY, WHEELER & PETERNELL, PLLC

26 
JOHN A. KESLER III, WSBA No. 39380
Attorney for Defendants