



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

November 1, 2023

Delivered electronically to Jessica Wadhams at “info@jessicawadhams.com”

Subject: Complaint filed by Glen Morgan, PDC Case 141109

Dear Jessica Wadhams:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Morgan. Staff expects you to timely and accurately file all required reports of contributions and expenditures in the future. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

Electronically signed

Jennifer Hansen
Compliance Officer

Electronically signed

Peter Frey Lavallee
Executive Director



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November 1, 2023

Delivered electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Complaint regarding Jessica Wadhams, PDC Case 141109

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 3, 2023. The complaint alleged that Jessica Wadhams, a candidate for Lake Stevens City Council in the 2021 election, may have violated: (1) RCW 42.17A.235 and .240 for failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing expenditures undertaken by the Campaign; and (2) RCW 42.17A.430 for improper transfer of funds to a bona fide political party committee.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by the Respondent; queried the Respondent’s data in the PDC contribution and expenditure database; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- On October 15, 2020, Jessica Wadhams submitted a Candidate Registration Statement (C-1 report) declaring her candidacy for Lake Stevens City Council, Position 6 in the 2021 election, selecting the “Full Reporting” option and listing Trevor Wadhams as Treasurer, Kari Ann Johnson as Web Designer, Lindsay Price as Social Media & Marketing, and Rachel Reese and Stephanie Steele as Consultants.
- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions, in-kind donations of goods or services, and expenditures made by the campaign.
- RCW 42.17A.240 describes the required content of each campaign reports including the name and address of each person making contributions and to whom an expenditure was made, accompanied with a detailed description of the expenditure.
- RCW 42.17A.430 identifies permissible uses of surplus funds, including the transfer of such funds without limit to a political party or caucus political committee.
- The complaint alleged that the 2021 Wadhams Campaign failed to report the candidate filing fee, failed to include adequate descriptions for expenditures made for political advertisement, and made an illegal donation of funds to the Washington State Democrats.
- During the investigation, staff found that some of the expenditure descriptions on the 2021 Wadhams Campaign C-4 reports lacked the required detail like number of items printed, dimensions of signs, and other goods purchased.

- Upon receipt of the complaint, Ms. Wadhams made several corrections to her 2021 campaign reports including expenditures made to Capitol City Press on July 29, 2021 in the amount of \$828.40, two on September 22, 2021 in the amounts of \$792.44 and \$359.66, and a fourth on October 7, 2021 in the amount of \$939.58, to add more detailed descriptions of the printing services. The Respondent also added a more detailed description for a September 26, 2021, expenditure to Amazon totaling \$195.85.
- The previously undisclosed \$200 candidate filing fee, which was paid by Ms. Wadhams using personal funds, was added to the May 2021 C-4 report as an in-kind contribution.
- Finally, Ms. Wadhams updated the description for the April 21, 2021 expenditure for \$221.41 to the Washington State Democrats to properly identify that it was not a donation but rather a fee for access to the VoteBuilder program.
- In her response, Ms. Wadhams stated that she was not aware of the requirement to disclose her out-of-pocket expenditure for the filing fee or the requirement to disclose more detail for expenditure descriptions. She further stated the mistakes were due to her being a new candidate with no prior experience with campaigns, and committed to more thorough reporting if she is a candidate again in the future.

Jessica Wadhams was a first-time candidate and lost in the 2021 election. It appears that the missing filing fee, the lack of detailed expenditure descriptions, and mistaken categorical label used for VoteBuilder services purchased from the Washington State Democrats, were due to minor errors and a general lack of knowledge about campaign finance reporting. No evidence was found that the late reporting was done to intentionally conceal campaign activity from the public.

Based on our findings staff has determined that, in this instance, failure to timely and accurately submit C-4 reports disclosing the required expenditure detail, and failure to report the candidate filing fee, do not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, Jessica Wadhams will receive a formal written warning concerning failure to timely and accurately disclose expenditures made by the 2021 Wadhams Campaign and failure to timely disclose the candidate filing fee. The formal written warning will include staff's expectation that Ms. Wadhams timely and accurately files all future required reports of contributions and expenditures. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Peter Frey Lavalley
Executive Director

cc: Jessica Wadhams