



**State of Washington**  
**PUBLIC DISCLOSURE COMMISSION**

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**Memorandum**

To: Public Disclosure Commission

From: Jennifer Hansen, Compliance Officer

Date: September 18, 2025

Subject: Charles Ames Brief Enforcement Hearing Memorandum: PDC Case #151223

**Allegations:**

PDC staff alleges that Charles Ames, a candidate for Lakewood City Council in the 2023 election, violated RCW 42.17A.235 and .240 by failing to timely and accurately file C-3 and C-4 reports disclosing campaign activity for election year 2023.

**Background:**

- On May 1, 2023, Charles Ames filed a Candidate Registration (C-1 report) declaring his candidacy for Lakewood City Council in the August 1, 2023, Primary Election, selecting the “Full Reporting” option and listing himself as Treasurer and the only officer. Mr. Ames was not elected to the position.
- On February 15, 2024, PDC staff received a complaint filed by Conner Edwards alleging that Charles Ames had violated RCW 42.17A.235 & .240 for failure to timely file a: (1) 21-day pre-primary C-4 report covering June 1, 2023 to July 10, 2023, due July 11, 2023; (2) a 7-day pre-primary C-4 report covering July 11, 2023 to July 24, 2023, due July 25, 2023; and (3) a post-primary C-4 report covering July 25, 2023 to August 31, 2023, due September 11, 2023. **[Exhibit A]**
- On April 4, 2024, PDC staff sent notice of the complaint to Mr. Ames and requested submittal of any missing reports.
- After conducting a preliminary review and assessment of the complaint filed by Mr. Edwards on February 15, 2024, PDC staff opened a formal investigation and held an Initial Hearing (Case Status Review) on May 7, 2024, pursuant to RCW 42.17A.755, and WACs 390-37-060 and 390-37-071. Mr. Ames did not participate in the Initial Hearing.

- On May 7, 2024, Mr. Ames replied saying he made the entries as best he was able, but found no updates reflected. On May 15, 2024, he sent another reply saying he had kept records of his campaign transactions.
- Mr. Ames timely filed a C-4 report covering May 19 to 31, 2023, and a C-4 report for June 2023, however the May 2023 C-4 did not reflect an accurate carry forward from campaign activity prior to May 19, 2023.
- On July 10, 2024, Mr. Ames worked with PDC staff to file a: (1) C-3 report disclosing a \$1,000 deposit of personal funds made January 3, 2023; (2) C-4 report covering activity from January 1 to April 30, 2023; (3) C-4 report covering the entire month of May 2023; (4) C-3 report disclosing a \$200 deposit of personal funds made June 15, 2023; and C-4 covering July 1 to September 30, 2023. The reports were submitted between 303 and 516 days late.
- On December 19, 2024, staff sent an email to Mr. Ames regarding a \$300 deposit disclosed on the C-4 report covering July 1 to September 30, 2023, that had no corresponding C-3 report showing the source of these funds. Staff noted some other small errors that needed to be addressed and offered assistance to make the corrections. Staff were unable to connect with Mr. Ames and no corrections were submitted independently.
- On April 15, 2025, Charles Ames filed a Candidate Registration (C-1 report) declaring his candidacy for Lakewood City Council in the 2025 election.
- On June 30, 2025, staff sent a follow up email to Mr. Ames providing specific details on the reporting issues and requested that the missing C-3 report for the deposit made on July 11, 2023, and corrected C-4 report covering July 1 to September 30, 2023, be submitted by no later than July 14, 2025.
- On June 30, 2025, Mr. Ames responded to staff saying that he was assured all matters were cleared up in late 2024, that addressing these matters during the current campaign is confusing, and asked staff if this could be remedied after the 2025 campaign.
- On August 25, 2025, staff sent Mr. Ames a Statement of Understanding (SOU) and requested it be returned by September 9, 2025, to avoid further enforcement action. **[Exhibit B]**
- Mr. Ames responded on August 26, 2025, asking how long the SOU would be on record. Staff sent a response the same day.
- PDC Disclosure Specialist staff had a separate conversation with Mr. Ames regarding mandatory reporting for his 2025 campaign and when asked whether filing the missing 2025 reports concluded his interactions with the PDC, staff reminded him of the pending enforcement matter for PDC Case #151223.
- On September 9, 2025, staff sent an email to Mr. Ames confirming that PDC Case #151223 regarding his 2023 campaign confirming that the case was still open and attached the SOU again to be returned.

- On September 9, 2025, Mr. Ames sent a reply sharing difficulties he had experienced with the PDC filing system.
- On September 19, 2025, PDC staff served Charles Ames, by electronic mail, with a hearing notice for a Brief Adjudicative Proceeding to be held on October 9, 2025, concerning alleged violations of RCW 42.17A.235 and 240 by failing to timely and accurately file C-3 and C-4 report disclosing activity undertaken by the 2023 Campaign as required by campaigns registered under the “Full Reporting” option.

**Laws & Rules:**

[RCW 42.17A.235](#) and [RCW 42.17A.240](#) require candidates to file timely, accurate reports of contributions and expenditures. Under the “Full Reporting” option, until five months before the general election, C-3 and C-4 reports are required monthly when contributions exceed \$750 since the last report; on the twenty-first day and the seventh day preceding the date of the primary and general election date; and on the tenth day of the first month after the primary and general election date.

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