



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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March 18, 2025

Delivered electronically to jacquelina1@hotmail.com, mitch@tewocf.com, mlamb@carneylaw.com

Subject: PDC Case 154764 regarding Jacquelin Maycumber

Jacquelin Maycumber:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Jake Espeland on June 4, 2024. The complaint alleged violations of RCW 42.17A.235, .240, .270, .445, .710 and WAC 390-16-238 for failure to timely and accurately report contributions and expenditures and personal use of contributions. In addition, the complaint alleged a failure to include income on the Personal Financial Affairs Statement (F-1).

Applicable Laws and Rules

- RCW 42.17A.235 describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions.
- RCW 42.17A.240 requires the filing of accurate campaign finance reports with the Public Disclosure Commission.
- RCW 42.17A.270 lists the requirements for receiving a contribution earmarked for the benefit of a candidate or another political committee.
- RCW 42.17A.445 and WAC 390-16-238 describe the requirements for and limitations on personal use of campaign contributions.
- RCW 42.17A.710 requires an elected or appointed official to file a Personal Financial Affairs Statement (F-1) with the PDC on or before April 15 each year that discloses accurate personal financial information for themselves and their spouse or registered domestic partner, if any, for the preceding calendar year.

Background and Findings

- Jacquelin Maycumber registered with the PDC on April 17, 2023 for the 2024 election as a candidate for 7th District State Representative but did not declare candidacy with the Secretary of State.
- Maycumber's name did not appear on the 2024 Primary Election ballot as a candidate for 7th District State Representative.

- Maycumber was a 2024 candidate for federal office, appearing on the 2024 Primary Election ballot in the 5th Congressional District.
- Maycumber did not advance to the 2024 General Election.
- In response to the alleged violations of
  - RCW 42.17A.235 and .240 by failing to timely and accurately file Summary Full Campaign Contributions and Expenditure (C-4) reports for the 2024 state Campaign disclosing a \$10,000 expenditure made to “The ROC Foundation” on April 11, 2024 and failing to timely and accurately file a C-4 report for your Surplus Funds Account disclosing a \$5,500 transfer of surplus funds to the Washington State Republican Party (WSRP):
    - Mitch Short, owner of The ROC Foundation stated Maycumber “didn’t want to end her State Campaign until filing week in May [2024] . . . I agreed that I would handle all of her State Campaign activities and keep the campaign open at least until May. . . . I submitted an invoice a few days later to the campaign and the campaign immediately paid me.”
    - Short also noted the Campaign Summary Receipts and Expenditures (C-4) report listing the \$5,500 Maycumber contributed to the WSRP was amended when the campaign’s treasurer was reconciling the (C-4) report covering April 2024.
  - RCW 42.17A.270, RCW 42.17A.445 and WAC 390-16-238 for failing to disclose an earmarked contribution of \$5,000 from the WSRP Federal PAC Account using the \$5,500 transfer of surplus funds to make expenditures not directly related to the 2024 House Re-Election candidacy, and instead supporting the federal candidacy for Congress in WA State’s 5th Congressional District:
    - Short stated, “Jacquelin has no influence over the WSRP, but she is grateful that they were willing to donate to her congressional campaign. It is my understanding that the account that the WSRP used to donate to her federal campaign is a completely separate fund from what they use for State campaigns.”
    - Short also added, “[M]y client has made numerous contributions from her surplus account to various Republican political organizations throughout the years. I want to reiterate that she has never directed any of these organizations on where that money was to go or how it was to be spent as a condition of her donating that money. She has never earmarked any donated money.”
  - RCW 42.17A.710 by failing to include income on the F-1 by including additional income on the federal financial disclosure that was not included on her state F-1:
    - Maycumber updated her F-1 before receiving the complaint. In the response to the complaint, however, Short noted Maycumber’s CPA “did not finish her taxes until June. That is when she learned she had made money on the sale of some cows in 2023.”
  - RCW 42.17A.445 and WAC 390-16-238 by making expenditures not directly related to the 2024 Washington State House of Representatives Re-Election candidacy:
    - Maycumber acknowledged a violation of Washington law, signed a Statement of Understanding and repaid the expenditures not directly related to the 2024 Washington State House of Representatives Re-Election candidacy.

## Summary and Resolution

Based on the responses provided and review of Maycumber's reports, PDC staff found no evidence of violations of RCW 42.17A.235, .240, .270, or .710 that would require conducting a more formal investigation into the complaints of or pursuing enforcement action.

Maycumber completed a Statement of Understanding (SOU) and paid a \$150 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.445 and WAC 390-16-238 by making expenditures not directly related to the 2024 Washington State House of Representatives Re-Election candidacy. The \$150 penalty and repayment of the expenditures not directly related to the 2024 Washington State House of Representatives Re-Election candidacy (\$1,385.13) resolves those allegations.

Maycumber is also hereby reminded of the importance of filing accurate financial information on the F-1 financial disclosure by the April deadline, regardless of the status of federal tax filings.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Electronically signed by Alice Fiman  
Alice Fiman  
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavalley  
Peter Frey Lavalley  
Executive Director

cc: Jake Espeland