



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](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)

January 17, 2025

And delivered electronically to [jimwilsonforwashington@gmail.com](mailto:jimwilsonforwashington@gmail.com) and  
[cg.edwards53@gmail.com](mailto:cg.edwards53@gmail.com)

Subject: PDC Order, Case 159274

Dear James (Jim) Wilson III,

Enclosed is a copy of the Public Disclosure Commission's Final Order that was entered in the above-referenced case.

At the December 19, 2024 Brief Adjudicative Proceeding (BAP), the Commission ordered a \$150 civil penalty assessed in accordance with WAC 390-37-182.

The \$150 penalty is payable within 30 days of the date of the Order. Your due date for payment is **February 17, 2025**. See the options below for how to pay online, by mail, or in-person.

**Electronic Payment Option**

Please be aware, processing fees may apply. To start the process for making an online payment, email the following information to [payments@pdc.wa.gov](mailto:payments@pdc.wa.gov) (see below):

- The PDC Case Number (159274)
- The Respondent's Name (James (Jim) Wilson III)

Once the case number and respondent name are received, an email with the payment link and further instructions about how to make a payment will be provided.

- You must send the payment no later than **February 17, 2025**.

**Mail or In-Person Payment Option**

To pay by check or money order, make the draft payable to "Washington State Treasurer," write your PDC Case Number (159274) in the Memo field, and mail or deliver the payment to one of the addresses shown below:

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  
Olympia, WA 98501-1267

Thank you for your prompt attention to this matter. If you have questions, please contact us by email at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically Signed by Tabitha Townsend*

Tabitha Townsend  
Compliance Officer

Enclosure: Order



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: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A

PDC Case 159274

James Wilson III,

Respondent.

Findings of Fact,  
Conclusions of Law, and  
**Order Imposing Fine**

Pursuant to the brief enforcement hearing (brief adjudicative proceeding) notice sent to James Wilson III on November 21, 2024, a brief adjudicative proceeding was held on December 19, 2024, remotely from Olympia, WA by live audio and online transmission, to consider whether the Respondent violated RCW 42.17A.205 and WAC 390-16-125 by exceeding Mini Reporting limits prior to receiving approval of a completed application to change reporting options.

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commission Chair Allen Hayward and Commissioner J. Leach presided at the hearing. The Commission staff was represented by Tabitha Townsend, Compliance Officer and Susie Giles-Klien, Assistant Attorney General. The Respondent's Attorney, Conner Edwards, participated in the hearing virtually.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. The Respondent was a candidate for State Senator for Legislative District 3.
2. As a candidate for election the Respondent, who filed their registration selecting Mini-Reporting, was required to remain within the Mini Limits until their request to switch to Full-Reporting was approved by the Executive Director.
3. The Respondent requested to move from Mini-Reporting to Full-Reporting on August 19, 2024.
4. As of August 25, 2024, the Respondent had exceeded Mini-Reporting limits prior to receiving approval from the Executive Director.

5. On September 9, 2024 the Respondent sent in a statement acknowledging the violation of WAC 390-16-125 for exceeding the limitations of the Mini-Reporting option and agreed that staff's approval of change to full reporting option did not absolve the campaign of the liability for a violation found by the PDC.
6. The Executive Director approved the switch from Mini to Full Reporting on September 11, 2024.
7. The Respondent has no prior violations.

### CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officers concluded as follows:

1. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.
2. The Respondent violated WAC 390-16-105 by failing to remain within Mini-Reporting limits until receiving approval from the Executive Director to switch to Full-Reporting.

### ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

**IT IS HEREBY ORDERED that the Respondent is assessed a civil penalty of \$150, in accordance with the penalty schedule set forth in WAC 390-37-143.**

**It is further ordered that the Respondent:**

- 1. Pay the \$150 civil penalty within 30 days of the date of this Order.**
- 2. Commit no further violations of Chapter 42.17A RCW or Title 390 WAC for a period of 4 years from the date of this order or the suspended \$150 will become due and payable without further Commission action.**

In the event the Respondent fails to pay the \$150 civil penalty within 30 days of the date of the Order, PDC staff is directed to refer the matter to collections or pursue enforcement in court.

This is an **Initial Order** of the Public Disclosure Commission.

Entered this 17<sup>th</sup> day of January 2025

Public Disclosure Commission

*Electronically Signed by Peter Frey Lavallee*

Peter Frey Lavallee  
Executive Director

I, Tabitha Townsend, certify that I mailed and emailed a copy of this order to the Respondent at their respective address postage pre-paid, and by email on the date stated herein.

Electronically Signed by Tabitha Townsend  
Signed

January 17, 2025  
Date

# APPEALS OF INITIAL ORDER

## REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request orally or in writing, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1). Staff may ask for written confirmation of oral requests for review.
- **REQUESTS FOR REVIEW MUST BE RECEIVED AT THE COMMISSION OFFICE WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE POSTMARK DATE OF THIS INITIAL ORDER.** Written requests for review should be delivered or mailed to the Washington State Public Disclosure Commission, 711 Capitol Way, Room 206, Box 40908, Olympia, WA 98504-0908.

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. *See* WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

---

## FURTHER APPEAL RIGHTS – SUPERIOR COURT

If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the final order. *See* WAC 390-37-142(5).

**YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.552.**