



**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)**

September 24, 2024

Delivered electronically to James (Jim) Wilson III at "info@jimwilsonforhoa.com"

Subject: PDC Staff Assessment of Facts, PDC Case 159274

Dear Jim Wilson:

On September 11, 2024, Public Disclosure Commission (PDC) staff sent a letter informing you that your request to change to the "Full Reporting" option was approved despite the fact that your 2024 campaign for State Senator for Legislative District 03 exceeded the \$7,000 contribution and expenditure limitations to qualify for the "Mini Reporting" option.

As noted in the September 11, 2024, letter, staff's review of the Monetary Contribution reports (C-3 reports) and Summary Campaign Full Contribution and Expenditure reports (C-4 reports) filed by your campaign disclosed contributions received had exceeded the \$7,000 limitations of the "Mini Reporting" Option prior to the approval of your request. In addition, you provided PDC staff with an email acknowledging apparent PDC violations by your campaign for exceeding the limitations of the "Mini Reporting" option.

PDC staff have opened an initial review into allegations that your campaign exceeded the contribution limitations of the "Mini Reporting" option. PDC staff has completed its initial assessment of the facts, which included the following aggravating and mitigating factors:

- You are a first-time candidate for public office.
- On July 24, 2024, you filed a Candidate Registration (C-1 report) declaring your candidacy for State Senator for Legislative District 03 in accordance with RCW 42.17A.205, selecting the "Mini Reporting" option provided by WAC 390-16-105. By selecting the "Mini Reporting" option, you were not subject to the requirements of RCW 42.17A.235 and .240 to file C-3 and C-4 report, provided your campaign did accept more than \$500 from any single source (excluding you as the candidate using your own funds) and did not receive contributions or make expenditures totaling more than \$7,000 plus filing fees over the course of your campaign.
- The campaign applied for approval to move to full reporting on Aug. 19, 2024.
- Based on our analysis, your campaign exceeded the \$500 contribution limitation from a contributor of the "Mini Reporting" option on August 25, 2024, with contributions received from Sally Goldstein for \$1,200, Pat Geiger for \$600 and Ronald Smith for \$1,000.

- After August 25, 2024, there were 6 more contributions received exceeding contribution limits of \$500 prior to the approval by the Executive Director on Sept. 11, 2024.
- Your campaign exceeded the \$7,601 limit (\$7,000 plus \$601 filing fee) on contributions that applied to your mini reporting campaign on Aug. 29, 2024, 13 days before receiving approval to move to full reporting. From the beginning of the campaign on June 1, 2024, to September 9, 2024, the contribution total exceeded \$7,000 by \$8,769.71 for a total of \$15,769.71 in contributions.
- On September 9, 2024, you submitted an email to staff acknowledging apparent violations for exceeding the limitations of the “Mini Reporting” option by receiving contributions and making expenditures, and that staff’s approval to change to the “Full Reporting” option does not absolve your campaign of the liability for a violation found by the PDC.
- On September 11, 2024, PDC staff sent you a letter approving your change to Full Reporting, after exceeding “Mini Reporting” limitations. The letter informed you that while you were approved to change to the “Full Reporting” option, your campaign was not absolved of the apparent violation for exceeding the “Mini Reporting” option restrictions.
- There was no evidence found of any intent to conceal or not to disclose campaign contribution and expenditure activities by you or your campaign by staying under the “Mini Reporting” option when the limitations of the reporting option had been exceeded.

Depending on the circumstances and the mitigating and aggravating factors of each case, a Respondent may have the opportunity to reach an alternative resolution to a matter, including the option to complete a Statement of Understanding with PDC staff as an alternative to scheduling an enforcement hearing.

On behalf of PDC staff, I will work with you on resolving this matter, including determining whether an alternative resolution might be appropriate under the circumstances. Although not required, I encourage you to submit a more formal response to the allegations of exceeding the limitations of the “Mini Reporting” option, by Tuesday, October 8, 2024.

If you have questions, you may contact me at 360-586-4555 or 360-753-1111, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Tabitha Townsend

Tabitha Townsend (She, Her)

Compliance Officer

Public Disclosure Commission