



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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August 7, 2025

Delivered electronically to kennethmobley2025@outlook.com and cg.edwards53@gmail.com

Subject: PDC Case 175685 regarding Kenneth Mobley

Dear Kenneth Mobley:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on July 11, 2025. The complaint alleged that Kenneth Mobley (the “Respondent”) violated RCW 42.17A.235 and .240 by failing to timely and accurately report contributions and expenditures. Specifically, you alleged that 1) May activity disclosed on the Respondent’s 21-day pre-Primary C-4 report (covering 5/18/25-7/14/25) was late; 2) the 21-day C-4 report was likely inaccurate because it was filed early; 3) the candidate filing fee was not disclosed; and 4) an in-kind contribution was missing vendor information and the number of yard signs purchased.

Applicable Laws and Rules

- Candidates that select the Full Reporting option on their *Candidate Registration* (C-1 report) are required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign Summary Receipts & Expenditures* reports (C-4 reports) pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the candidate’s election participation¹, and their financial activity.²

¹ [RCW 42.17A.005\(38\)](#) defines “participate” to mean that, with respect to a particular election, an entity engages in one or more of the following activities: 1) makes a monetary or in-kind contribution to a candidate; 2) makes an independent expenditure or electioneering communication supporting or opposing a candidate; or 3) engages in an activity described in .005(38)(c), (d) or (e).

² Per [RCW 42.17A.235\(3\)\(a\)](#), each treasurer of a candidate or political committee is required to file a report on the tenth day of each month during which they are not participating in an election campaign only if the committee 1) received a contribution or made an expenditure in the preceding calendar month; and 2) either total contributions received or total expenditures made since the last such report exceed \$750. A candidate may delay filing monthly C-4 reports during periods when they are not participating in election until they have either received contributions or made expenditures that exceed \$750.

- Pursuant to [RCW 42.17A.240\(7\)](#), expenditures are disclosed on C-4 reports, which must include, but are not limited to: 1) the name and address of each person to whom an expenditure was made in the aggregate of more than \$200³ during the period covered by the report; 2) the amount, date, and purpose of each expenditure; and 3) the total sum of all expenditures. Expenditure details should include, but are not limited to, the name and address of the vendor or recipient, the goods or services provided, including the number of items purchased. For advertising expenditures, campaigns should describe the type and number of ads, where they appeared or were broadcast, and when (e.g. run dates). An in-kind contribution is disclosed as an expenditure for purposes of campaign accounting and reporting.

Background and Findings

- The Respondent is a first-time candidate who seeks election to the position of City Council Member with the City of Shelton in the 2025 election. He filed a *Candidate Registration* (C-1 report) with the PDC on May 18, 2025, selected the Full Reporting option, and is serving as his own Treasurer. The Respondent is participating in the August 5, 2025, Primary Election.
- On July 16, 2025, the Respondent replied to the complaint by email, thanked PDC staff for their detailed instructions, and said he would take corrective action soon.
- The Respondent was cooperative throughout our assessment of the complaint and took corrective action as needed.
- The Respondent does not have previous warnings/violations of PDC requirements.

Allegation: Late Reporting (2025)

- On July 10, 2025, the Respondent filed a 21-day pre-Primary C-4 report (covering 5/18/25-7/14/25) five days early. The candidate committee first met the \$750 threshold for monthly reporting on July 10, 2025. As a result, the original May activity in the report was not late as the complaint alleged.
- The Respondent's C-3 report for a deposit dated 7/2/25 was filed 3 days late. The deposit consisted of a single \$150 contribution.
- A C-3 report for a deposit made on 7/10/25 was timely filed.
- The Respondent's 7-day pre-Primary C-4 report (covering 7/15/25-7/28/25) was timely filed on July 29, 2025, and amended the same day to add a vendor address.

Allegation: Missing or Insufficient In-Kind Contribution Details

³ Per [WAC 390-05-400](#), this dollar amount increased from \$50 to \$200 effective April 1, 2023.

- The Respondent amended his 21-day pre-Primary C-4 report (covering 5/7/25- 7/14/25) three times to resolve the following issues:
 - On July 21, 2025, to include the number of yard signs, and vendor name and address for an in-kind contribution;
 - On July 22, 2025, to include activity for 5/7/25-5/17/25 and disclose the Respondent's 5/7/25 in-kind contribution for the \$60 candidate filing fee; and
 - On July 25, 2025, to include vendor name and address for an in-kind contribution.

Summary and Resolution

Late reporting consisted of a single C-3 report for a \$150 deposit and your \$60 candidate filing fee, both of which were disclosed prior to the Primary Election. The in-kind contribution details missing from your original 21-day C-4 report appeared to be good-faith omissions. Both matters are mitigated by your status as a first-time candidate, quick corrective action, and good-faith efforts to comply.

The violations of PDC laws and rules made by your late reporting are remediable in nature and do not warrant further investigation or enforcement action. The expenditure (\$60) and contribution (\$150) involved totaled no more than the contribution limit set forth in RCW 42.17A.405(2), were inadvertent and minor, and have been cured. They did not materially harm the public interest beyond the harm to the policy of Chapter 42.17A RCW inherent in any violation. In addition, you filed and amended the required reports within 21 days after they were due to be filed and substantially met filing deadlines for all other required reports within the preceding 12 months.

However, PDC staff are reminding you about the importance of providing sufficient details for in-kind contributions on C-4 reports, including vendor name and address and the number of items purchased; and 2) timely amending reports within 21 days of the original, whenever possible, in accordance with the PDC laws, rules or guidance.

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

If you have questions, you may contact Tabatha Blacksmith at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed by Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed by Kim Bradford
Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director

cc: Conner Edwards