



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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October 30, 2025

Delivered electronically to Carly James at carly@electcarly.com

Subject: PDC Case 175835 regarding Carly James

Carly James:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on July 16, 2025. The complaint alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately submit reports disclosing expenditure details as required; and RCW 42.17A.445 for personal use of campaign funds.

Applicable Laws and Rules

[RCW 42.17A.235](#) describes the required filing deadlines for disclosure of campaign finance activities including monetary contributions, in-kind donations of goods or services, and expenditures made by the campaign.

[RCW 42.17A.240](#) describes the required content of each campaign report including the name and address of each person making contributions and to whom an expenditure was made

[RCW 42.17A.445](#) describes when the use of campaign funds for personal use is allowed by a candidate.

Background and Findings

- On September 3, 2025, you, Carly James, filed/submitted a Candidate Registration Statement (C-1 report) declaring your candidacy for Port Commissioner, Position 2, for the Port of Bellingham in the 2025 election year, selecting the “Full Reporting” option and listing yourself as Treasurer.
- On July 15, 2025, your campaign filed a C-4 report covering activity from May 23 to July 14, 2025, but failed to include the sub-vendor description for the expenditure made by The Campaign on June 16, 2025, to “Ace & Jig” in the amount of \$221.92.
- On July 24, 2025, your Campaign amended the May 23 to July 14, 2025, C-4 report to include the sub-vendor’s full mailing address.
- Regarding the allegation about the use of campaign funds for personal use, the staff noted that it appears that your use of campaign funds for “candidate clothing for fundraiser” and “hair & makeup for photoshoot” in the amount of \$221.92 and \$122, respectively, was something that you said was based on guidance given by the PDC staff in May 2025.

- In your response, specific to the alleged use of campaign funds for personal use, you stated: “Before making any purchases for my campaign, I called the PDC to ask questions about expenditures. This would have been back in May. I didn’t note the exact date or agent I spoke with. I asked the agent about purchasing clothing and accessories specifically for photoshoots and campaign events. I was told I could, and at the end of the campaign, I had the option to donate them, sell them for fair-market value and put the money back into the campaign, or set them aside for future campaigns. I made two purchases with this understanding of the rules. The two items I purchased have been used solely for campaign purposes, and I intend to either sell them or set them aside for future campaigns. I would not have purchased these items for myself personally, and I am not using them outside of campaign work.”

Summary and Resolution

Regarding the allegation of personal use of campaign funds, the Campaign’s expenditures were consistent with PDC guidance and do not constitute impermissible personal use. That allegation is, consequently, dismissed.

As to the other expenditure at issue, it appears that the lack of description detail and sub-vendor information for the expenditure made by your Campaign was due to the lack of knowledge and experience as a first-time candidate. The staff found no evidence that the details about the sub-vendor at issue in this matter was done purposely to conceal this information from the public.

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purpose of this chapter. Under WAC 390-37- 060, the executive director, at any time prior to consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted.

Pursuant to WAC 390-37-060(1)(d), however, you are receiving a formal written warning concerning failure to timely and accurately disclose details regarding contributions and expenditures. PDC staff expects you to timely and accurately file all future required reports of contributions and expenditures. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Any allegations regarding reporting by The Committee for the 2025 primary election cycle that are not otherwise addressed are hereby dismissed.

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 Erick O. Agina at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Endorsed by,

Electronically signed by Jennifer Hansen

Erick O. Agina
Compliance Officer

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee
Executive Director

cc: Conner Edwards