



**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 • Website: www.pdc.wa.gov

December 12, 2023

Delivered electronically to Jamie Smith at “votejamiesmith@gmail.com”

Subject: Complaint filed by Glen Morgan, PDC Case 141807

Dear Jamie Smith:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Morgan. Staff expects you to timely and accurately file all required reports of contributions and expenditures, specifically including an accurate carry forward balance and the required detailed description for expenditures made in the future. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Peter Frey Lavallee
Executive Director



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December 12, 2023

Delivered electronically to Glen Morgan at “glen@wethegoverned.com”

Subject: Complaint regarding Jamie Smith, PDC Case 141807

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 26, 2023. The complaint alleged that Jamie Smith, a candidate for State Representative, Legislative District 25 during the 2018, 2020 and 2022 elections may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing expenditures undertaken by the Campaign, including an inaccurate carry forward balance, and for failure to include detailed descriptions for expenditures made.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by the Respondent; queried the Respondent’s data in the PDC contribution and expenditure database; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- Jamie Smith was an unsuccessful candidate for State Representative, Legislative District 25 in the 2018, 2020 and 2022 elections.
- 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 reports including the name and address of each person making contributions and to whom an expenditure was made, accompanied with a detailed description of the expenditure.
- The complaint alleged that the 2018, 2020 and 2022 Smith Campaigns failed to timely file C-3 and C-4 reports in several instances, reported an incorrect carry forward balance on C-4 reports and failed to include adequate descriptions for expenditures made. The evidence of the late reporting was submitted in the form of a spreadsheet where the projected due date was assumed solely based on the reporting schedule for committees registered under the “Full Reporting” option, participating in elections during the calendar year and without consideration of the dollar amount disclosed on each report.
- In addition, the spreadsheet alleged that twenty amended reports were submitted late but did not provide any specific information about the activity that purportedly was omitted from the original or otherwise edited.

- During the review of the alleged late reporting spreadsheet, PDC staff found that many disclosed small dollar amounts under the reporting threshold (more than \$750 as of April 1, 2023, and more than \$200 in prior years) for monthly C-4 reports, or were amendments as discussed above.
- In response to the complaint, Ministerial Treasurer David Kacoroski worked with PDC Filer Assistance staff to audit the three prior campaigns and determine what corrections were needed.
- After receipt of the complaint, the Respondent submitted missing C-3 and C-4 reports for the 2018, 2020 and 2022 elections, and amendments to correct the carry forward balance discrepancy and to add more detailed descriptions for expenditures made.
- During the investigation, staff found that some of the expenditure descriptions on the 2018, 2020 and 2022 Smith Campaigns C-4 reports lacked the required detail like number of items printed, dimensions of signs, and other goods purchased.
- During the investigation, staff found that the C-4 report for the 2020 campaign covering October 27, 2020, to November 30, 2020, showed a cash on hand balance of \$14,502.48 and the subsequent C-4 report for the 2022 campaign covering May 1 - 31, 2022, began with \$10,332.29 as the carry forward.
- On August 29, 2023, the Respondent submitted a C-4 report to reconcile the discrepancy discussed above.

Jamie Smith was a first-time candidate in 2018 and lost in the 2018, 2020 and 2022 elections. It appears that the late reporting, the lack of detailed expenditure descriptions, and error made in the carry forward balance, were due to oversight and a general lack of knowledge about campaign finance reporting. No evidence was found that the late reporting was done to intentionally conceal campaign activity from the public. Staff noted that the Respondent submitted corrected reports for 2018 and that most of the activity is now outside of the statute of limitations for enforcement action.

Based on our findings staff has determined that, in this instance, failure to timely and accurately submit C-3 and C-4 reports, failure to disclose the required expenditure detail, and failure to timely report an accurate carry forward balance, do not amount to a finding of a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, Jamie Smith will receive a formal written warning concerning failure to timely and accurately disclose contributions and expenditures made by the 2018, 2020 and 2022 Smith Campaigns, and failure to include detailed descriptions for expenditures. The formal written warning will include staff's expectation that Ms. Smith timely and accurately files all future required reports of contributions and expenditures. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Peter Frey Lavalley
Executive Director

cc: Jamie Smith