



**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 • Website: www.pdca.wa.gov

January 30, 2024

Delivered electronically to Jamie Smith at votejamiesmith@gmail.com

Subject: Complaints filed by Glen Morgan and Conner Edwards, PDC Case 144425

Dear Jamie Smith:

Below is a copy of an electronic letter sent to Glen Morgan and Conner Edwards concerning their complaints filed with the Public Disclosure Commission (PDC).

As noted in the letter to Messrs. Morgan and Edwards, the PDC has dismissed these matters following RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in these matters.

However, per WAC 390-37-060(1)(d), this serves as a formal written warning concerning 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), showing contributions and expenditures undertaken by the 2023 Campaign. Staff expects you, moving forward, to file accurate and timely reports of contributions and expenditures in the ORCA system. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

If you have questions, you may contact Tanya Mercier by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavallee
Executive Director



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January 30, 2024

Delivered electronically to Glen Morgan at glen@wethegovernor.com and Conner Edwards at cg.edwards53@gmail.com

Subject: Complaints against Jamie Smith, PDC Case 144425

Dear Glen Morgan and Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaints you filed on October 26, 2023, October 27, 2023, and December 13, 2023. The complaints alleged that Jamie Smith, a candidate for Pierce County Council, 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), showing contributions and expenditures undertaken by the 2023 Campaign.

PDC staff reviewed the allegation(s); the applicable statutes, rules, and reporting requirements; the response(s) provided by the Respondent; the applicable PDC reports filed by the Respondent; the Respondent's data in the PDC contribution and expenditure database; and other relevant information, to decide whether the record supports a finding of one or more violations.

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

- Jamie Smith was a candidate in 2023 for the County Council of Pierce County. Ms. Smith filed a Candidate Registration (C-1) on May 18, 2023, for the Full Reporting option. The declaration of candidacy was filed also on May 18, 2023. Patti Dailey is the Treasurer for Ms. Smith's 2023 campaign.
- C-3 reports are due if contributions have been received and deposited. Bank deposits must be made weekly if contributions are received. Between June and the general election day, C-3s should be filed weekly on Mondays. Per RCW 42.17A.005(15)(b)(i), bank interest is not a contribution and therefore does not trigger a C-3 reporting requirement.
- Regarding Mr. Morgan's complaint alleging missing C-3 and C-4 reports since August 30, 2023, staff reviewed the reports filed by the Jamie Smith campaign and found the following:
 - Following the multiple complaints, the campaign filed C-3 reports for 8/28/23, 9/5/23, 9/11/23, 9/18/23, 9/25/23, and 11/6/23 on December 15, 2023. However,

there were no contributions received or deposited during these reporting periods, so no reports were due.

- C-3 reports for the weeks of 10/2/23, 10/9/23, 10/16/23, and 10/30/23, were filed together in one report on October 27, 2023. The reporting was timely, considering \$2,400 in contributions were received on 10/27/23 and no contributions were received prior.
 - A post-primary C-4 report, for period 7/25/23 – 8/31/23, was due on August 31, 2023. The campaign filed a C-4, for the period 7/25/23 – 10/31/23, on October 31, 2023, and amended on December 20, 2023. The original report showed \$2,000 cash received with a deposit date of August 15, 2023, and \$195 in expenditures. The amended report added a nominal amount for bank interest to the “cash received.” This C-4 was two months late for the post-primary reporting period, but this was mitigated by the corresponding C-3, #110168152, being filed timely.
 - C-3 reporting, for deposits made after November 6, 2023, was due on December 11, 2023, and the campaign filed a report on December 15, 2023. There were no contributions received or deposited during this reporting period, so a report was not due.
 - Deposits made in December have a C-3 due on 1/10/24.
- Conner Edwards complaints alleged a missing 21-day pre-election C-4 report, for period 9/1/23 – 10/16/23, and a missing post-election C-4 for the period 10/31/23 – 11/30/23.
 - The 21-day pre-election C-4 was due on October 17, 2023. The campaign combined the post-primary C-4 and the 21-day pre-election C-4 into a single report and filed it on October 31, 2023, and amended on December 20, 2023. The original report showed \$2,000 cash received with a deposit date of August 15, 2023, and \$195 in expenditures. The amended report added a nominal amount for bank interest to the “cash received.” This C-4 was two weeks late for the pre-election reporting period, but this was mitigated by the corresponding C-3, #110168152, being filed timely.
 - The post-election C-4 was due on December 11, 2023. The campaign filed the report on December 14, 2023, and amended on December 20, 2023. The report was 3 days late. The late reporting is mitigated by the fact that the reporting was for a \$65 expenditure for a storage fee and a nominal amount for bank interest.
- The Respondent does have other similar warnings of PDC requirements.

Based on our case review staff has determined that, in this instance, failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), showing contributions and expenditures undertaken by the 2023 Campaign, does not amount to a finding of a violation that calls for further investigation.

Pursuant to WAC 390-37-060(1)(d), however, Jamie Smith will receive a formal written warning concerning 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), showing contributions and expenditures undertaken by the 2023 Campaign. Staff expects Ms. Smith, moving forward, to file accurate and timely reports of contributions and expenditures in the ORCA system. If violations of PDC laws or rules occur in the future, the Commission will consider this formal written warning in deciding on further Commission action.

Based on this information, the PDC finds that no further action necessary and has dismissed this matter per RCW 42.17A.755(1).

If you have questions, you may contact Tanya Mercier by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavalley
Executive Director

cc: Jamie Smith