



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

October 1, 2020

Sent electronically by email to:

Mark Lamb: mark@northcreeklaw.com

Joshua Freed campaign: info@freedforgovernor.com

Chad Standifer: chad.standifer@atg.wa.gov

Mark Lamb, attorney for Joshua Freed
Freed for Governor
PO Box 2141
Bothell, WA 98041

Subject: Commission Final Order, PDC Case 66161, Joshua Freed

Dear Mark Lamb:

Enclosed is a copy of the Public Disclosure Commission's Final Order Imposing Fine that was entered in the above-referenced case concerning Joshua Freed. Also enclosed is a copy of the Stipulation as to Facts, Violations and Penalty that was accepted by the Commission.

At its September 24, 2020 meeting, the Commission found Joshua Freed in violation of RCW 42.17A.145, RCW 42.17A.235(9), RCW 42.17A.235, RCW 42.17A.240, RCW 42.17A.445 and WAC 390-16-226(1) and assessed a total civil penalty of \$50,000 of which \$25,000 is suspended on the following conditions: (1) The Respondent is not found to have committed any further violations of Chapter 42.17A RCW or Title 390 WAC within four years of the date of this Final Order. The suspended penalty shall not be assessed based solely upon any remediable violation, minor violation, or error classified by the Commission as appropriate to address by a technical correction; (2) The Respondent remains in full compliance with all PDC reporting requirements and; (3) The non-suspended portion of the penalty (\$25,000) is paid by the Respondent within 30 days of the date of this Final Order.

Please make your \$25,000 check or money order payable to the WA State Treasurer, and mail the payment to the address listed below:

**Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908**

In the event Joshua Freed fails to meet any of the above terms of this order, the entire \$50,000 penalty will become immediately due without any further intervention of the Commission.

Joshua Freed
Final Order Cover Letter
PDC Cases 66161
Page 2

If you have questions, please contact Alice Fiman at (360) 584-4746; toll free at (877) 601-2828 or by email at alice.fiman@pdc.wa.gov.

Sincerely,

Electronically signed: Peter Lavallee
Executive Director

Enclosure: Final Order and Stipulation as to Facts, Violations and Penalty

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7 **BEFORE THE PUBLIC DISCLOSURE COMMISSION**
8 **OF THE STATE OF WASHINGTON**

9 In re the Matter of Enforcement Action
10 Against:

PDC CASE NO. 66161

FINAL ORDER

11 JOSHUA FREED,

12 Respondent.
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15 **I. INTRODUCTION**

16 This matter was heard remotely by the Washington State Public Disclosure Commission
17 (PDC, Commission) on September 24, 2020, by audio and online streaming. The hearing was
18 held pursuant to Chapter 34.05 RCW, Chapter 42.17A RCW, and Chapter 390-37 WAC.

19 Commissioners present both telephonically and online were David Ammons,
20 Commission Chair (presiding); Fred Jarrett, Commission Vice-Chair; and Commissioners
21 William Downing, Russell Lehman, and Nancy Isserlis. Also present both telephonically and
22 online were Assistant Attorney General John S. Meader representing the Commission; Assistant
23 Attorney General Chad Standifer representing PDC staff; and Alice Fiman and Kurt Young,
24 Compliance Officer and Senior Compliance Officer, for PDC Staff. Respondent Joshua Freed
25 was represented by his attorney, Mark Lamb, who also appeared telephonically and online. The
26

1 proceeding was open to the public as limited by Governor's Order 20-28 *et seq.* and recorded.

2 The hearing concerned allegations that Joshua Freed, former candidate for Governor of
3 Washington, violated RCW 42.17A.235 and .240 by failing to timely and accurately file
4 Campaign Contribution and Expenditure Reports; RCW 42.17A.445 by exceeding the \$6,000
5 per election candidate loan repayment limits; RCW 42.17A.145 and .235(9) by filing reports
6 that were not correct as certified; and WAC 390-16-226(1) by failing to record the loan in a
7 written loan agreement.

8 The Commissioners had before them the following materials:

- 9 • Report of Investigation for Case #66161 prepared by PDC Compliance Officer Alice Fiman,
10 dated July 29, 2020, which included:
 - 11 ○ Complaints filed by William Casey and Lorie Walker dated February 21,
12 and February 22, 2020, respectively;
 - 13 ○ C-3 Report filed October 10, 2019, disclosing the receipt of a \$500,000
14 candidate loan from Joshua Freed;
 - 15 ○ C-4 Report for January, 2020, filed February 10, 2020;
 - 16 ○ Response from Attorney Mark Lamb on behalf of the Campaign filed
17 June 11, 2020;
 - 18 ○ Amended C-3 Report, filed June 30, 2020;
 - 19 ○ Three Amended C-4 Reports dated June 1, June 12, and June 30, 2020,
20 filed in June, 2020;
 - 21 ○ Fourth Amended January, 2020, C-4 Report filed July 21, 2020;
 - 22 ○ Redacted copies of Campaign bank statements, provided July 21, 2020;
 - 23 ○ Seattle Times news report;
 - 24 ○ Correspondence from Mark Lamb, dated June 24, and July 8, 2020;
 - 25 ○ Correspondence from PDC Staff to Mark Lamb requesting unredacted
26 bank records dated July 22, 2020.

- 1
- 2 • Proposed Stipulation as to Facts, Violations, and Penalty submitted by the parties, signed on
- 3 September 23, 2020, by Peter Lavalley, Executive Director, for the PDC and on September
- 4 22, 2020, by Mark Lamb, Attorney, on behalf of Joshua Freed, Respondent.
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6 **II. STIPULATION**

7 The parties jointly submitted a signed Stipulation as to Facts, Violations, and Penalty

8 (Stipulation). Mr. Standifer presented the Stipulation, reviewed the aggravating and mitigating

9 factors, summarized the proposed penalties, discussed the lack of comparable cases, and asked

10 the Commission to accept the Stipulation. In response to questions from the Commission, Mr.

11 Lamb provided argument that the Respondent had been responsive in addressing the complaint

12 and was now in compliance with all reporting obligations. The Respondent took responsibility

13 and also asked the Commission to accept the Stipulation. The Commission voted 5-0 to accept

14 the Stipulation.

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16 **III. FINDINGS OF FACT**

17 1. On August 8, 2019, Joshua Freed registered with the PDC declaring his candidacy for

18 the Office of Governor, establishing the Joshua Freed for Governor Committee (Campaign) for

19 the 2020 election, and selected the Full Reporting Option.

20 2. Mr. Freed had previously filed with the PDC as a 2005 candidate for Bothell City

21 Council and was elected to that office in 2005, and then reelected in 2009, and 2013, serving on

22 the Council as either a Councilmember or as Mayor until 2017.

23 3. On October 10, 2019, the Campaign filed a Monetary Contributions Report (C-3

24 report) disclosing that a \$500,000 candidate loan had been received from Joshua Freed using his

25 personal funds on September 14, 2019. The loan was disclosed on line 1c of the C-3 report as

26 having been received and deposited on September 14, 2019. Although requested by PDC staff,

1 no loan document was ever produced.

2 4. On October 10, 2019, the Campaign also filed a completed Schedule L Document
3 (Schedule L) that was attached to the C-3 report as required for a candidate using personal funds
4 to make a loan to the candidate's own authorized committee. The Schedule L disclosed that the
5 Campaign received a \$500,000 loan from Mr. Freed on September 14, 2019, that was designated
6 as a candidate loan for the 2020 primary election by checking the primary box and listing a zero
7 percent annual interest rate was being charged.

8 5. On February 10, 2020, the Campaign filed the January, 2020, Summary Full Campaign
9 Contributions and Expenditures Report (C-4 report) disclosing \$95,201 in monetary
10 contributions received, \$661.84 for in-kind contributions received, and \$521,765.47 in total
11 expenditures that had been made during the period.

12 6. The C-4 report filed by the Campaign on February 10, 2020, disclosed that a \$500,000
13 expenditure was made to Joshua Freed on January 31, 2020, and listed the Schedule A
14 description for the expenditure as "Loan Received" from Mr. Freed on September 14, 2019. The
15 C-4 report included a completed Schedule L, Section 2, of the form for Loan Payments that also
16 disclosed a \$500,000 expenditure to Joshua Freed on January 31, 2020, as a loan repayment.

17 7. On June 30, 2020, the Campaign filed an Amended C-3 Report retroactively
18 reclassifying the previously disclosed \$500,000 candidate loan from Joshua Freed as a \$500,000
19 monetary contribution received from the candidate's personal funds. The Amended C-3 Report
20 disclosed the \$500,000 contribution from Mr. Freed on line 1b of the report and removed any
21 reference to the Schedule L loan document.

22 8. In June of 2020, the Campaign filed three Amended C-4 Reports for the January, 2020,
23 filings. Two of the amendments listed the expenditure description as an expenditure made to
24 Joshua Freed for repayment of the "Loan Received." The third Amended C-4 Report for
25 January, 2020, was filed by the Campaign on June 30, 2020, and amended the \$500,000
26 expenditure description to a "Refund of Contribution."

1 9. On July 21, 2020, the Campaign filed an additional amended January, 2020, C-4 report
2 removing the \$500,000 expenditure to Mr. Freed and instead disclosed that a \$450,000
3 expenditure had been made by the Campaign on January 31, 2020, to Mr. Freed, and again listing
4 the description as a "Refund of Contribution."

5 10. PDC staff repeatedly requested that the Campaign provide copies of its bank
6 statements to verify the nature of the transactions. On July 21, 2020, the Campaign provided
7 copies of heavily redacted bank statements in response to staff's request for that information.
8 On August 12, 2020, following the issuance of a Notice of Administrative Charges in this matter,
9 unredacted bank statements were provided by the Campaign.

10 11. The copies of the Campaign's bank statements listed a "Telephone Transfer Credit"
11 of \$500,000 into the Freed for Governor account as having been received on September 6, 2019,
12 eight days earlier than the September 14, 2019, date disclosed on the initial C-3 report. A second
13 "Telephone Transfer Credit" in the amount of \$450,000 was transferred out of the Freed for
14 Governor bank account on December 31, 2019, thirty-one days earlier than the expenditure had
15 been disclosed to the PDC.

16 12. Mitigating factors in this matter include that: the Campaign timely filed C-3 and C-
17 4 reports for the 2020 election cycle and the Respondent has not previously been found in
18 violation of Chapter 42.17A RCW or Title 390 WAC.

19 13. Aggravating factors in this matter include that: the public was deprived of significant
20 campaign finance information for a good portion of the 2020 Primary Election cycle; at the time
21 the loans were made by Mr. Freed, they made up the majority of the campaign funds; the
22 Campaign was for the highest elected office in Washington State and had a professional
23 organization with experienced staff; and the Campaign had the resources available to comply
24 with the reporting requirements for its Committee in accordance with Chapter 42.17A RCW and
25 Title 390 WAC.

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IV. CONCLUSIONS OF LAW

1. The Commission has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure law; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC.

2. Based on the facts set forth above and the agreed stipulation of the parties, Respondent Joshua Freed violated:

- RCW 42.17A.235 and .240 by failing to timely and accurately file Summary Campaign Contributions and Expenditure Reports (C-4 Reports) and Monetary Contributions Reports (C-3 reports) disclosing the acceptance and repayment of the contribution/loan by the Campaign.
- RCW 42.17A.445 by exceeding the \$6,000 per election candidate loan repayment limits when his Campaign repaid the Respondent at least \$450,000 of a \$500,000 candidate loan he made to the campaign.
- RCW 42.17A.145 and .235(9) by filing reports concerning the contribution/loan that were not correct as was certified.
- WAC 390-16-226(1) by failing to record the loan in a written loan agreement executed at the time of the loan.

V. ORDER

Based upon its Findings of Fact and the stipulated Findings and Conclusions, the Commission accepts the agreed Stipulation of the parties and orders that:


1. Respondent Joshua Freed is assessed a total civil penalty of \$50,000.
2. \$25,000 of the \$50,000 civil penalty is suspended on the following conditions:

- 1 a. Joshua Freed is not found to have committed any further violations of
2 Chapter 42.17A RCW or Title 390 WAC within four years of the date of
3 the Final Order in this matter. The suspended penalty shall not be
4 assessed based solely upon any remediable violation, minor violation, or
5 error classified by the Commission as appropriate to address by a
6 technical correction.
- 7 b. Joshua Freed remains in compliance with all reporting requirements.
- 8 c. The non-suspended portion of the penalty (\$25,000) is paid by the
9 Respondent within 60 days of the date of the Final Order in this matter.
10 If the Respondent fails to make timely payment of the non-suspended
11 portion of the penalty, the \$25,000 suspended portion of the penalty
12 shall immediately become due without further action by the
13 Commission.
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17 So ORDERED this 15th day of October, 2020.

18 WASHINGTON STATE PUBLIC
19 DISCLOSURE COMMISSION

20 FOR THE COMMISSION:

21 
22 David Ammons,
23 Chair, Public Disclosure Commission
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1 *Copy of this Order emailed to:*

2 Mark Lamb, Attorney, for Joshua Freed (mark@northcreeklaw.com);

3 Alice Fiman, PDC Compliance Officer (Alice.fiman@pdc.wa.gov);

4 Chad Standifer, Assistant Attorney General, Counsel for PDC Staff (ChadS@atg.wa.gov).

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6
7 I, **Alice Fiman** certify that I mailed a copy of this order to the Respondent/ Applicant at his/
her respective address postage pre-paid on the date stated herein.

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9 Electronically signed: Alice Fiman, Compliance Officer October 1, 2020

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12 Signed _____ Date _____

13 **NOTICE: RECONSIDERATION**

14 Pursuant to the provisions of RCW 34.05.470 and WAC 390-37-150, you may file a Petition for
15 Reconsideration with the PDC within ten (10) days from the date this Final Order is served upon
16 you. Any Request for reconsideration must state the specific grounds for the relief requested.
17 Petitions must be electronically mailed to the Washington State Public Disclosure Commission,
711 Capitol Way, Room 206, Box 40908, Olympia WA 98504-0908, pdc@pdc.wa.gov.

18 **NOTICE: PETITION FOR JUDICIAL REVIEW**

19 You have the right to appeal this Final Order to Superior Court, pursuant to the Petition for
20 Judicial Review provisions of RCW 34.05.542. Any Petition for Judicial Review of this Final
21 Order must be filed with the court and also served upon both the Commission and the Office of
22 the Attorney general within thirty (30) days after the date this Final Order is served upon you.
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**BEFORE THE PUBLIC DISCLOSURE COMMISSION OF THE STATE OF
WASHINGTON**

In the Matter of Enforcement Action
Against:

Joshua Freed
Respondent.

Case No. 66161

**STIPULATION AS TO FACTS,
VIOLATIONS AND PENALTY**

The parties to this Stipulation, namely, the Public Disclosure Commission Staff, through its Executive Director, Peter Lavalley, and Respondent Joshua Freed, a 2020 candidate for Governor of Washington State through Mark Lamb, legal counsel for the Respondent, submit this Stipulation as to Facts, Violations and Penalty in this matter. The parties agree that the Commission has the authority to accept, reject or modify the terms of this Stipulation. The parties further agree that in the event the Commission suggests modification to any term of this agreement, each party reserves the right to accept or reject that modification. In the event either party rejects a modification, this matter will proceed to hearing before the Commission.

JURISDICTION

The Public Disclosure Commission has jurisdiction over this proceeding pursuant to RCW 42.17A, the state campaign finance and disclosure laws; RCW 34.05, the Administrative Procedure Act; and WAC 390.

FACTS

1. On August 8, 2019, Joshua Freed registered with the PDC declaring his candidacy for Office of Governor, establishing the Joshua Freed for Governor committee (Campaign) for the 2020 election, selecting the Full Reporting Option and listed party preference as Republican.
2. Mr. Freed has previously filed with the PDC as a 2005 candidate for Bothell City Council in which he was elected to that office in 2005, and re-elected in 2009, and 2013, serving on the Council as either a City Councilmember or as Mayor until 2017.

3. On October 10, 2019, the Campaign filed a Monetary Contributions report (C-3 report) disclosing that a \$500,000 candidate loan had been received from Joshua Freed using his personal funds on September 14, 2019. The \$500,000 candidate loan was disclosed on line 1c of the C-3 report as having been received and deposited on September 14, 2019. Although requested by staff, no loan document was ever produced by the Campaign.
4. The Campaign also filed a completed Schedule L Loan Document (Schedule L) that was attached to the C-3 report submitted on October 10, 2019, as required for a candidate using personal funds to make a loan to the candidate's own authorized committee. The Schedule L disclosed that the Campaign received a \$500,000 loan from Joshua Freed on September 14, 2019, which was designated as a candidate loan for the 2020 primary election by checking the primary box and listing a zero percent annual interest rate was being charged.
5. On February 10, 2020, the Campaign filed the January 2020 Summary Full Campaign Contributions and Expenditures report (C-4 report) disclosing \$95,201 in monetary contributions received, plus \$661.84 for in-kind contributions received, and \$521,765.47 in total expenditures had been made during the period.
6. The C-4 report filed by the Campaign disclosed that a \$500,000 expenditure was made to Joshua Freed on January 31, 2020 and listed the Schedule A description for the expenditure as "Loan Received" from Mr. Freed on September 14, 2019. The January 2020 C-4 report included a completed Schedule L, Section 2 of the form for Loan Payments and disclosed a \$500,000 expenditure was made to Joshua Freed on January 31, 2020 as loan repayment.
7. On June 30, 2020, the Campaign filed an amended C-3 report for the information that had been previously disclosed on the October 10, 2019 C-3 report, retroactively reclassifying the previously disclosed \$500,000 candidate loan from Joshua Freed as a \$500,000 monetary contribution received from the candidate's personal funds. The amended C-3 report disclosed the \$500,000 contribution from Mr. Freed using personal funds on line 1b of the report and removed any referenced to the Schedule L loan document.
8. In June of 2020, the Campaign also filed three amended C-4 reports for the January 2020 timeframe, and two of the amendments listed the expenditure description as an expenditure made to Joshua Freed for repayment of the "Loan Received." The third and final amended

C-4 report for January of 2020 was filed by the Campaign on June 30, 2020 and amended the \$500,000 expenditure description to state "Refund of Contribution".

9. On July 21, 2020, the Campaign filed an additional amended January 2020 C-4, removing the \$500,000 expenditure made to Mr. Freed and instead disclosed that a \$450,000 expenditure had been made by the Campaign on January 31, 2020 to Joshua Freed, and again listing the description as a "Refund of Contribution."
10. PDC Staff repeatedly requested that the Campaign provide copies of the Campaign's bank statements to verify the nature of the transactions described above. On July 21, 2020, the Campaign provided copies of heavily redacted bank statements in response to staff's request for that information. On August 12, 2020, following the issuance of a Notice of Administrative Charges in this matter, unredacted bank statements were provided by the Campaign.
11. The copies of the Campaign's bank statements listed a "Telephone Transfer Credit" of \$500,000 into the Freed for Governor account as having been received on September 6, 2019, eight days earlier than the September 14, 2019 date disclosed on the initial C-3 report filed with the PDC by the Campaign.
12. In addition, the copies of the bank statements listed that a "Telephone Transfer Debit" in the amount of \$450,000 had been transferred out of the Freed for Governor bank account on December 31, 2019, thirty-one days earlier than the expenditure that had been made to Mr. Freed was disclosed to the PDC.

PENALTY FACTORS

In reviewing the appropriateness of the civil penalty, Commission Staff reviewed the criteria in WAC 390-37-182. The mitigating factors in this matter include that:

1. The Respondent's Campaign timely filed C-3 and C-4 reports for the 2020 election cycle.
2. The Respondent has not previously been found to have violated RCW 42.17A or WAC 390.

The aggravating factors in this matter include that:

3. The public was deprived of significant Campaign finance information for a good portion of the 2020 Primary Election cycle concerning the loans and/or contributions made by Mr. Freed to his Campaign.
4. At the time made, the loans and/or contribution made by Mr. Freed to his campaign made up the majority of the campaign's funds.
5. The Campaign was for the highest statewide elected office in Washington State and had a professional organization with experienced staff administering it.
6. The Campaign has the resources available to comply with the reporting requirements for its Committee in accordance with RCW 42.17A and WAC 390.

STATUTORY AND RULE AUTHORITY

RCW 42.17A.145 requires every report and statement required under RCW 42.17A shall identify the person preparing it, and shall be certified as complete and correct, both by the person preparing it and by the person on whose behalf it is filed.

RCW 42.17A.235 provides that a treasurer or candidate shall preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred, with (9) requiring all reports filed pursuant to subsection (1) or (2) be certified as correct by the candidate and the treasurer.

RCW 42.17A.240 require candidates under the Full Reporting Option to file timely, accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the committee. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. Beginning June 1st for every participant in an election, C-4 reports are required 21 and 7 days before each election, and a post-election C-4 report in which the committee receives contributions or makes expenditures, and in the month following the election.

RCW 42.17A.445 states repayment of loans made by the individual to political committees shall be reported pursuant to RCW 42.17A.240. However, contributions may not be used to

reimburse a candidate for loans totaling more than dollar amounts adjusted for inflation by rule of the commission adopted under the authority of RCW 42.17A.125. Current dollar amounts are listed in WAC 390-05-400.

WAC 390-16-226(1) provides that only loans which are recorded in a written loan agreement executed at the time of the loan and properly reported may be repaid to a candidate.

The rule also states the amount of campaign contributions which may be used to repay a loan made by the candidate to the candidate's own political committee or campaign, is limited to the loan repayment limit in RCW 42.17A.445(3) as adjusted by WAC 390-05-400. For purposes of the loan repayment limit, these loans are aggregated for each primary, general, special or recall election and must be designated accordingly by the candidate at the time the loan is made.

WAC 390-05-400 allows, pursuant to the authority in RCW 42.17A.125, the commission to revise the monetary contribution limits and reporting thresholds and code values of the act to reflect changes in economic conditions. The current (2020) reimbursement of candidate for loan to own campaign is \$6,000.

PDC Interpretation No. 14-01 states that a candidate may not receive loan repayments that exceed the limitations allowed by RCW 42.17A.445(3).

VIOLATIONS

Based on the Stipulation of Facts set forth above, the Respondent stipulates to having violated:

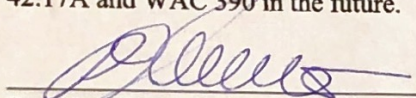
1. RCW 42.17A.235 and .240 by failing to timely and accurately file Summary Campaign Contribution and Expenditure Reports (C-4 reports) and Monetary Contributions Reports (C-3 reports) disclosing the acceptance and repayment of the contribution/loan by the Campaign.
2. RCW 42.17A.445, by exceeding the \$6,000 per election candidate loan repayment limits when his Campaign repaid Respondent Freed at least \$450,000 of a \$500,000 candidate loan he made to the campaign.
3. RCW 42.17A.145 and RCW 42.17A.235(9), by filing reports concerning the contribution/loan that were not correct as was certified.

4. WAC 390-16-226(1), by failing to record the loan in a written loan agreement executed at the time of the loan.

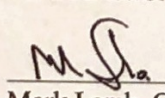
PENALTY

1. Based upon the Stipulation of Facts and Violations set forth above, the Respondent agrees to pay a total civil penalty of \$50,000 with \$25,000 suspended, on the following conditions:
 - a. The Respondent is not found to have committed any further violations of RCW 42.17A or WAC 390 within four years of the date of the final order in this matter. The suspended penalty shall not be assessed based solely upon any remediable violation, minor violation, or error classified by the Commission as appropriate to address by a technical correction.
 - b. The Respondent is in compliance with all reporting requirements.
 - c. The non-suspended portion of the penalty (\$25,000) is paid by the Respondent within 60 days of the date of the final order in this matter. If the Respondent fails to make timely payment of the non-suspended portion of the penalty, the \$25,000 suspended portion of the penalty shall immediately become due without further action by the Commission.

The Respondent affirms his intention to comply in good faith with the provisions of RCW 42.17A and WAC 390 in the future.


Peter Lavalley, Executive Director
Public Disclosure Commission

9/23/2020
Date Signed


Mark Lamb, Counsel for
Joshua Freed, Respondent

9.22.20
Date Signed