



**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.pdcc.wa.gov

August 7, 2020

Delivered electronically to info@freedforgovernor.com

Subject: PDC Case 66555

Dear Joshua Freed:

Below is a copy of an electronic letter sent to concerning a complaint filed with the Public Disclosure Commission (PDC). As noted below in the letter to Martin L. "Iceman" Wheeler, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of timely and accurately reporting expenditure detail, having both the candidate and treasurer certify reports as complete and disclosing contributor employer and occupation for contributions over \$100.

PDC staff expects in the future you will timely file accurate and complete reports, in accordance with PDC laws and rules.

If you have questions, you may contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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August 7, 2020

Delivered electronically to wheeler2020campaign@gmail.com

Subject: Complaint regarding Joshua Freed, PDC Case 66555

Dear Martin L. "Iceman" Wheeler:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed March 5, 2020. The complaint alleged Joshua Freed, a 2020 candidate for Governor, may have violated RCW 42.17A.145, .235 and .240 by failing to timely and accurately report expenditure detail, and failing to have both the candidate and treasurer certify reports as complete and also may have violated WAC 390-16-034 by failing to disclose contributor employer and occupation for contributions over \$100.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, and the response from Mark Lamb, attorney for Joshua Freed for Governor (Campaign) to determine whether the record supports a finding of one or more violations.

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

- On August 8, 2019, Joshua Freed (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. Freed has previously filed with the PDC as a candidate for Bothell City Council, having been elected to that office in 2005, and having served on the Council or as Mayor until 2017.
- In response to the complaint, the Campaign amended the Monetary Contributions (C-3) reports and Summary Full Campaign Contribution and Expenditure (C-4) reports noted in the complaint.
- During its investigation, PDC staff noted missing expenditure detail on C-4 reports, and the campaign amended additional reports, adding required details.
- In response, Lamb reported to the PDC the Campaign is unable to provide expenditure detail on Twitter expenditures, stating "the campaign advises me that there is no other

detail to be had. Since twitter, by policy, does not sell ads to political campaigns they do not retain analytic information. Each ad the campaign put up was taken down (some sooner and some later). No other detail exists. The amended C4s already submitted have provided all the information available.”

- Joshua Freed did not advance to the 2020 General Election.

Based on these findings, staff has determined in this instance the failure to timely and accurately report expenditure detail, and have both the candidate and treasurer certify reports as complete and failing to disclose contributor employer and occupation for contributions over \$100 does not amount a violation warranting further investigation.

PDC staff is reminding about the importance of filing timely, accurate and complete reports in accordance with PDC laws and 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 Alice Fiman toll-free at 1-877-601-2828 or by e-mail at fdc@fdc.wa.gov.

Sincerely,

Endorsed by,

/s

Alice Fiman
Compliance Officer

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director