



**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 16, 2024

Delivered electronically to electnicktimm2024@gmail.com

Subject: Complaints filed by Ronnie Jackson and Naomie Peasley, PDC Case 157886

Dear Nicholas "Nick" Timm:

Below is a copy of an electronic letter sent to Ronnie Jackson and Naomie Peasley concerning complaints filed with the Public Disclosure Commission (PDC).

As noted in the letter to Ronnie Jackson and Naomie Peasley, 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 timely and accurately disclose all required information for you and your spouse on a *Personal Financial Affair Statement* (F-1 report), including reportable income, real estate, and business associations, as noted in the enclosed letter sent to Mr. Jackson and Ms. Peasley. Staff expect you to timely and accurately disclose all required information on the F-1 report 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.

We are also reminding you to review the content of your F-1 report after submission in the future to ensure that no information was omitted and/or fails to appear on the report.

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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavalley
Peter Frey Lavalley
Executive Director



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October 16, 2024

Delivered electronically to Ronnie Jackson at findtherightpassion@outlook.com and Naomie Peasley at ncpeasley@hotmail.com

Subject: Complaint regarding Nicholas Timm, PDC Case 157886

Dear Ronnie Jackson and Naomie Peasley:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on August 7, 2024 and August 21, 2024. The complaints alleged that Nicholas Timm, a 2024 candidate, may have violated RCW 42.17A.710 by failing to disclose 1) business interests and associated income on his *Personal Financial Affairs Statement* (F-1 report), specifically from Red Light Bar LLC and MFB Holdings, LLC; and 2) real estate owned in Washington State.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the responses provided by Nicholas Timm (the “Respondent”); the applicable PDC reports filed by the Respondent; and other relevant information to determine whether the record supports a finding of one or more violations.

Applicable Laws & Rules

- Pursuant to [RCW 42.17A.700](#), a candidate is required to file a *Personal Financial Affairs Statement* (F-1 report) with the PDC within two weeks of becoming a candidate that discloses personal financial information for themselves and their spouse or registered domestic partner, if any, for the twelve months preceding candidacy.
- Per [RCW 42.17A.710](#), the content of the F-1 report includes, but is not limited to, the following information:
 - income of \$2,400 or more;
 - financial assets and interest income (bank and savings accounts and insurance policies greater than \$24,000 and investments greater than \$2,400);
 - Washington State real estate valued at more than \$12,000; and
 - debt of \$2,400 or more, business and organizational interests¹.

¹ See <https://www.pdcca.wa.gov/registration-reporting/personal-financial-affairs-disclosure/completing-f-1/business-and-organizational-interests>.

Background & Findings

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

- The Respondent is a 2024 candidate for County Commissioner of Okanogan County. He timely filed a *Candidate Registration* (C-1 report) with the PDC on April 17, 2024 and amended his C-1 report on April 26, 2024. The Respondent participated in the 2024 Primary election and qualified for the 2024 General election.
- The Respondent filed a *Personal Financial Affairs Statement* (F-1 report) covering the twelve-month period preceding his candidacy (4/17/23 - 4/16/24) on May 11, 2024, which is ten days after the two-week deadline that commenced with his submission of a C-1 report but within five days of declaring candidacy with the Elections Division. The original F-1 report was incomplete as alleged in the complaints, and information was omitted for the Respondent's spouse, Lisa Timm.
- According to reports filed with the WA State Secretary of State's Corporation's Division, the Respondent is listed as a governing person for three companies: Solutions Weed and Pest Control, LLC, Red Light Bar LLC and MFB Holdings LLC.
- Okanogan County Assessor's Office records show the Respondent owns eight parcels of real estate, individually or jointly with his spouse, Lisa Timm.
- Between August 19, 2024 and August 23, 2024, the Respondent sent a series of email responses to the PDC regarding the complaints. He said he enlisted the help of his accountant in completing the original F-1 report and had entered the required information. However, upon reviewing his F-1 report after the first complaint was filed, the Respondent said he learned that the information he previously entered was not populating or displaying on the report. He stated he tried to reenter information in the Income and Real Estate sections of the F-1 report but it would not "stick" and said he also had difficulty certifying and submitting the report. The Respondent indicated he worked with PDC staff to resolve the above issues.
- The Respondent indicated he is a passive investor in Red Light Bar LLC and did not receive compensation from the bar during the period covered by the F-1 report (4/17/23-4/16/24). He said the bar was in its start-up phase during the reporting period and all the income generated was reinvested in the business. In a social media post dated March 18, 2024, the Respondent stated that he and his spouse were turning over ownership of the bar to new owners.
- The Respondent successfully amended his F-1 report to include the missing information on August 26, 2024. The amended report reflected the addition of the following information for the Respondent and his spouse:
 - Three additional income sources, including rental income from MFB Holdings
 - Nine parcels and four lots of real estate in Okanogan County and their related mortgages
 - Two additional business associations, including Red Light Bar, LLC and MFB Holdings, LLC

- The Respondent does not have any previous warnings/violations of PDC requirements.

Summary and Resolution

Mitigating factors in this case are as follows:

1. The omissions on the Respondent's F-1 report appear to be the result of technical issues.
2. The Respondent is a first-time candidate.
3. The Respondent quickly took corrective action to remedy his F-1 report so the required information was disclosed and available to the voting public prior to the General Election.

Based on our findings, staff has determined that, in this instance, failure to timely and accurately report income, real estate and business associations on the candidate F-1 report does not amount to a violation that warrants further investigation.

Pursuant to [WAC 390-37-060\(1\)\(d\)](#), however, Nicholas Timm will receive a formal written warning concerning his failure to timely and accurately disclose all required information for himself and his spouse on a *Personal Financial Affairs Statement* (F-1 report), including reportable income, real estate and business associations. The formal written warning will include staff's expectation that Nicholas Timm timely and accurately disclose all required information on the F-1 report 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.

PDC staff is reminding Nicholas Timm to review the content of his F-1 report after submission in the future to ensure that no information was omitted or fails to appear on the report.

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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed Tabatha Blacksmith

Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed Peter Frey Lavalley

Peter Frey Lavalley
Executive Director

cc: Nicholas Timm