



**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

June 16, 2025

Delivered electronically to info@electerikaevans.com, erikaevansseattle@gmail.com,
iglitzin@workerlaw.com, youngblood@workerlaw.com and maxvill390@gmail.com

Subject: PDC Case 169334 regarding Erika Evans

Dear Erika Evans:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Maxwell Villella on March 23, 2025. The complaint alleged violations of RCW 42.17A.205 and .700 for failure to timely file a *Candidate Registration* (C-1 report) and *Personal Affairs Financial Statement* (F-1 report) within two weeks of becoming a 2025 candidate, which Mr. Villella alleged may have occurred as early as February 18, 2025 based on the date of the domain name registration for your candidate website. The complaint also alleged that your campaign expenditures for the domain name, website hosting (e.g. WordPress), and professional photography may have been sufficient to require the submission of a February C-4 report by March 10, 2025, the absence of which would violate RCW 42.17A.235 and .240.

Applicable Laws and Rules

- [RCW 42.17A.005\(8\)](#) states that an individual is considered to be a “candidate” (seeks election to public office) when they first 1) receive contributions, make expenditures, or reserve space or facilities with the intent to promote their candidacy for office; 2) announce publicly or file for office; 3) purchase commercial advertising space or broadcast time to promote their candidacy; or 4) give consent to another person to perform items 1 and 3 above.
- Per [WAC 390-05-200](#), an individual is presumed to be a “candidate” if 1) a political committee promoting their election for public office exists with the candidate’s knowledge and consent; 2) the individual makes a public declaration of candidacy, even if the candidacy is conditioned on a future occurrence; or 3) surplus funds are received or expended that trigger candidacy as indicated in [WAC 390-16-230](#).
- A candidate is required to register pursuant to [RCW 42.17A.205](#) within two weeks of becoming a candidate, as defined, by filing a *Candidate Registration* (C-1 report). A candidate that selects the Full Reporting option on their C-1 report is required to report contributions and expenditures to the PDC on *Cash Receipts Monetary Contributions* reports (C-3 reports) and *Campaign*

Summary Receipts & Expenditures reports (C-4 reports) pursuant to [RCW 42.17A.235](#) & [RCW 42.17A.240](#). The due dates for these reports are based upon the election cycle, the candidate's election participation, and their financial activity¹.

- [RCW 42.17A.700](#) requires a candidate to file a *Personal Financial Affairs Statement* (F-1 report) with the PDC within two weeks of becoming a candidate, as defined, that discloses personal financial information for themselves and their spouse or registered domestic partner, if any, for the twelve months preceding candidacy.

Background and Findings

- Erika Evans (the “Respondent”) is a 2025 candidate for the position of City Attorney for the City of Seattle.
- The candidate’s website domain name [electerikaevans.com](#) was registered and purchased on February 4, 2025.
- The Respondent filed a *Candidate Registration* (C-1 report) with the PDC on March 3, 2025 and selected the Full Reporting option.
- The Respondent filed a *Personal Financial Affairs Statement* (F-1 report) with the PDC on March 17, 2025.
- On April 9, 2025, the Respondent’s attorney replied to the complaint in writing by email and said the following:
 - Ms. Evans was considering running for office in early February of 2025 but had not yet made a final decision as of the date of the domain name purchase, and did not have any expectation of receiving contributions in any election campaign at that time.
 - The Respondent was not a “candidate,” as defined in RCW 42.17A.005(8), when the domain name was purchased, so the two-week window to for her to file an F-1 report was not triggered.
 - The Respondent did not make her decision to become a candidate until February 26, 2025 when she signed a contract with a strategist, and the website was not launched until after the Respondent filed a C-1 report registering as a candidate.
 - The attorney indicated his belief that the Respondent filed C-1 and F-1 reports within the requisite two-week period.
 - The website platform used by the strategist in February was a free version of WordPress and the professional photos provided as evidence with the complaint were taken on

¹ A candidate committee is required to file a monthly C-4 report by the tenth day of each following month if, during the prior month, they 1) received a contribution or made an expenditure that exceeded \$750; and 2) were not participating in an election. This dollar amount increased from \$200 to \$750 effective April 1, 2023. [RCW 42.17A.235\(3\)\(a\)](#).

March 9, 2025, not in February. As a result, the dollar amount threshold that would have triggered monthly reporting for February was not met.

- The attorney indicated his belief that “the simple purchase of a domain name, without an adjoining development of public launch of a website does not and should not hold the same meaning as the actual public launch of a campaign” and should therefore not be deemed to automatically trigger the two-week period within which a C-1 report should be filed.
- Finally, the attorney asked that the PDC consider the domain name purchase by the strategist was an unintentional lapse, committed by a first-time filer, had minimal impact on the public, and was not the result of any intent to evade the requirements of the law.
- On April 10, 2025, the Respondent’s campaign timely filed a C-4 report for March containing, but not limited to, the following disclosures:
 - Two expenditures for professional photography, including: \$340.98 paid to EB4 Photography on March 14, 2025 for a photo shoot dated 3/9; and \$400 paid to Chona Kasinger Photography on March 31, 2025. *The Respondent later confirmed that the additional photos were taken on March 10, 2025.*
 - Debt² incurred with NWP Consulting on March 31, 2025 in the amount of \$14,846.25, which included \$1,800 for website design and \$86.25 for website hosting. *The Respondent later confirmed that NWP Consulting is the strategist that purchased the domain name.*
- On April 10, 2025, the Complainant submitted a supplemental complaint citing [a news article](#) in the Stranger, dated March 27, 2025, wherein the Respondent was interviewed about her plans to run for elected office. The newspaper quoted the Respondent as saying “the final straw came during a hearing” about a constitutional issue that her then-employer (the U.S. Attorney’s Office) was defending. The Respondent disagreed with the position taken by her employer at the hearing and was quoted in the article as saying she thought she was on “the wrong side” of the issue. The article goes on to say: “She [the Respondent] quit and decided the ultimate way to serve her community would be to fight back against [United States President Donald] Trump, to become Seattle’s City Attorney.” According to another [news article](#), the hearing in question was held on January 23, 2025. The Complainant alleged that the Stranger interview establishes an intention to run for office that occurred prior to the purchase of the domain name, making the latter an official campaign action that required to submission of a C-1 report within two weeks of becoming a candidate.
- In an email, dated April 14, 2025, the Respondent’s attorney characterized the article cited by the Complainant as a stylized retrospective account by the reporter that did not capture the full nuance of the Respondent’s deliberative process and conflated emotional conviction with legal

² Debt owed must be reported on a C-4 report if it is more than \$1,000, outstanding as of the end of the reporting period, and has been outstanding for more than 5 business days (within 30 days of an election) or more than 10 business days (during all other times). [WAC 390-16-042](#).

candidacy. He reiterated that the Respondent did not make the decision to run for office until February 26, 2025.

- On April 27, 2025, the Respondent's attorney provided additional information by email indicating that the domain name was reserved by a strategist (who had not yet been hired by his client) as part of a "broader exploratory phase" while the Respondent weighed the decision whether or pursue elected office. He stated that reserving a domain name 1) is often a routine and precautionary measure in the early stages of consideration to preserve the option of using it later; 2) was one of several preparatory steps taken to "assess the feasibility of a campaign"; and 3) did not reflect a final decision to become a candidate. He indicated his belief that the Respondent became a candidate by formally announcing her candidacy via the submission of a C-1 report on March 3, 2025.
 - In the 4/27/25 email, the Respondent's attorney confirmed that the campaign had reimbursed the strategist (NWP Consulting) \$26.85 for the domain name purchased on February 4, 2025, which was invoiced to the campaign by NWP Consulting on March 31, 2025 and paid by the campaign on April 4, 2025.
- On May 5, 2025, the Respondent's attorney confirmed by email that the candidate's website was publicly launched on March 10, 2025.
- On May 10, 2025, the Respondent's campaign timely filed a C-4 report for April that included, but was not limited to, \$1,750.91 in non-itemized expenditures (lump sum). Expenditures of \$200 or less, such as the domain name reimbursement, do not need to be itemized on a C-4 report to include the required expenditure details.³
- The Respondent does not have previous warnings/violations of PDC requirements.

Summary and Resolution

Your response indicates that you decided to become a candidate on February 26, 2025 when you entered into a contract with a strategist/consultant. This activity made you a "candidate," as defined, effective February 26, 2025, because you incurred campaign debt and gave the strategist consent to make expenditures on your behalf, such as the 2/4/25 domain name registration for your candidate website.

It's important to note the following:

- 1) Candidacy is triggered by the *first* occurrence of one of the activities described in RCW 42.17A.005(8) or WAC 390-05-200. While filing a *Candidate Registration* (C-1 report) with the PDC can also make an individual a candidate, this does not appear to be the first activity to trigger candidacy in this instance.
- 2) A public declaration of candidacy can occur during an interview for a news article, even if candidacy is conditioned on a future occurrence. In this instance, the news article was not

³ Pursuant to [RCW 42.17A.240\(7\)](#), expenditures are disclosed on C-4 reports, which must include, but are not limited to: 1) the name and address of each person to whom an expenditure was made in the aggregate of more than \$200 during the period covered by the report; 2) the amount, date, and purpose of each expenditure; and 3) the total sum of all expenditures.

definitive, but it did lend weight to the allegation that the Respondent intended to run for office earlier than two weeks prior to her candidate registration date of March 3, 2025.

- 3) A candidate's exploratory committee⁴, established to determine the feasibility of running for office, is subject to the same reporting requirements and deadlines as any other candidate committee. If such an entity makes an expenditure, registration is required.

Based on a candidacy date of February 26, 2025, both your C-1 and F-1 reports were due to be filed no later than March 12, 2025. Your C-1 report was timely submitted but your F-1 report, which was filed on March 17, 2025, was five days late.

Noncompliance regarding the late F-1 report appears to be the result of a good-faith error, omission or misunderstanding. Mitigating factors include your status as a first-time candidate, and the minimal impact of noncompliance on the public.

However, pursuant to [WAC 390-37-060\(1\)\(d\)](#), this serves as a formal written warning concerning your failure to timely file a *Personal Financial Affairs Statement*. PDC staff expects you to timely file the required (candidate) F-1 report should you choose to run for office again in the future, and the F-1 report annually, if you are elected to office. 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 also reminding you about the importance of timely registering as a candidate within two weeks in the future, in accordance with PDC laws and rules, if you make a public declaration of candidacy, accept contributions, make an expenditure or incur debt.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, you may contact Tabatha Blacksmith at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed by Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavalley
Peter Frey Lavalley
Executive Director

cc: Maxwell Villella

⁴ Washington state law does not recognize a distinct category of "exploratory" committees.