



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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October 31, 2018

SHIR REGEV
114 PATTON ST
RICHLAND WA 99354

Subject: PDC Staff Assessment of Facts, PDC Case 42253

Dear Ms. Regev:

On August 29, 2018, Public Disclosure Commission (PDC) staff sent a letter informing you that your request to change to the Full Reporting option was denied since your 2018 Campaign accepted monetary contributions and in-kind contribution/loans that exceeded the \$5,000 contribution limitations for the Mini Reporting option. As noted in the August 29th letter, staff's review of the reports filed by your Campaign at the time of your request indicated that due to the amount of contributions received, you had already exceeded the limitations of the Mini Reporting Option, and there was no way for you to remedy the matter to get back within Mini contribution limits.

As also noted in the August 29th letter, based on the C-3 and C-4 reports filed by your Campaign, PDC staff opened an initial review into allegations that your 2018 campaign for State Representative exceeded the contribution limitations of the Mini Reporting Option. PDC staff has completed its initial assessment of the facts, which included the following aggravating and mitigating factors:

- You were a 2017 candidate for Richland City Council selecting the Full Reporting option and serving as your own Treasurer. Your Campaign disclosed receiving \$3,645 in monetary and in-kind contributions and making \$2,970 in expenditures, and a review of those filings indicated your campaign could have qualified for the Mini Reporting Option.
- Your 2018 Campaign exceeded the \$5,000 contribution limitations of the Mini Reporting Option on July 19, 2018, when you made a \$1,571 in-kind contribution/loan to your Campaign for a mailer.
- Your 2018 Campaign exceeded the \$5,000 expenditure limitations on August 14, 2018, when you made \$3,020 in expenditures for loan repayments to you as the candidate.
- You have not disclosed receiving any additional contributions and or making any expenditures since being informed about your request to change options was denied. Please confirm is that is still correct.
- There was no evidence found of any intent to conceal or not disclose Campaign contribution and expenditure activities by you or your Campaign by staying under the Mini Reporting Option when the limitations of the reporting option had been exceeded.

During the 2018 Legislative Session Engrossed Substitute House Bill 2938 was passed, which provided PDC staff with additional tools to resolve complaints through alternatives to non-compliance. Based on the facts of a specific case, those tools and the PDC's existing rules afford a Respondent the opportunity to complete a Statement of Understanding or enter into an early Stipulated agreement as an alternative to scheduling an enforcement hearing.

I am encouraging you to work with PDC staff on resolving this matter. If you would like to submit a more formal response to the allegations of exceeding the limitations of the Mini Reporting Option, please do so as soon as possible or no later than November 5, 2018. If you have questions, please feel free to contact Kurt Young at (360) 664-8854, toll free at 1-877-601-2828, or by email at kurt.young@pdc.wa.gov

Sincerely,



Peter Lavalley
PDC Executive Director



Public Disclosure Commission
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