



STATE OF WASHINGTON  
**PUBLIC DISCLOSURE COMMISSION**

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

IN THE MATTER OF ENFORCEMENT )  
ACTION AGAINST )

Aaron Reardon )

Respondent. )  
\_\_\_\_\_ )

PDC CASE NO: 11-041

Notice of Administrative  
Charges

IT IS ALLEGED as follows:

**I. Jurisdiction**

1. The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17 RCW, the Public Disclosure Act; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

**II. Allegations**

2. Staff alleges that Aaron Reardon violated RCW 42.17.241 by failing to disclose, on his Personal Financial Affairs Statement (PDC form F-1 or F-1A), two entertainment and travel occasions in 2009 that were paid for by a source other than his own governmental agency (Snohomish County) in connection with an appearance or trade mission made in an official capacity.

**III. Background and Facts**

3. Aaron Reardon was elected Snohomish County Executive in 2003, and took office in January of 2004. He was re-elected Snohomish County Executive in 2007, and is a candidate seeking re-election to that office in 2011. Prior to 2004, Mr. Reardon served as a State Senator and State Representative from the 38th Legislative District.

4. On February 12, 2010, Mr. Reardon timely filed PDC form F-1A, the "Personal Financial Affairs Statement Short Form" covering reportable activity for calendar year 2009. Mr. Reardon certified on the F-1A report that he had reviewed his last complete F-1, filed on April 15, 2009 for 2008 activity, and that there were no reportable changes since 2008 to be included in his F-1A report covering 2009 activity. When Mr. Reardon filed his F-1A on February 12, 2010, he did not disclose any 2009 travel or entertainment expenses paid for by a source other than Snohomish County in connection with an appearance or trade mission made in an official capacity.
5. On April 22, 2011, Mr. Reardon filed an amended F-1A report for calendar year 2009, disclosing two reportable travel occasions not previously disclosed. The first was also an allegation in a citizen's action filed on May 4, 2011 under RCW 42.17.400. The second was discovered by Mr. Reardon and self-reported on April 22, 2011. The amended F-1A included the following reportable items not previously disclosed:
  - a. Travel and Entertainment for a March 4, 2009 to March 19, 2009 trade mission to the United Arab Emirates. Mr. Reardon listed the Greater Seattle Chamber of Commerce as the sponsor of the travel. He disclosed the actual value of the travel and entertainment as \$7,780, and the value code as Code B; and
  - b. Travel and Entertainment for a September 22, 2009 to September 24, 2009 North American Strategic Infrastructure Leadership Forum in Washington, D.C. Mr. Reardon listed CG/LA Infrastructure, LLC as the sponsor of the travel. He disclosed the actual value of the travel and entertainment as \$575, and the value code as Code A.

#### **IV. Law**

**RCW 42.17.241(1)** states, in part, "The statement of financial affairs required by RCW 42.17.240 shall disclose for the reporting individual and each member of his or

her immediate family: ... (m) A list of each occasion, specifying date, donor, and amount, at which items specified in RCW 42.52.010(10) (d) and (f) were accepted.”

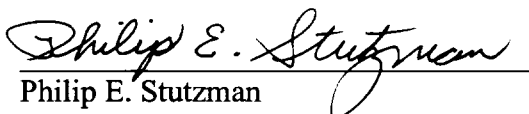
**RCW 42.52.010** defines those reportable occasions as:

“(d) Payments by a governmental or nongovernmental entity of reasonable expenses incurred in connection with a speech, presentation, appearance, or trade mission made in an official capacity. As used in this subsection, "reasonable expenses" are limited to travel, lodging, and subsistence expenses incurred the day before through the day after the event;

(e) Items a state officer or state employee is authorized by law to accept;

(f) Payment of enrollment and course fees and reasonable travel expenses attributable to attending seminars and educational programs sponsored by a bona fide governmental or nonprofit professional, educational, trade, or charitable association or institution. As used in this subsection, "reasonable expenses" are limited to travel, lodging, and subsistence expenses incurred the day before through the day after the event...”

RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of June, 2011.

  
Philip E. Stutzman  
Director of Compliance