

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

In the Matter of Enforcement Action  
Against:

Aaron Reardon

Respondent.

Case No. 11-041

**STIPULATION AS TO FACTS AND  
VIOLATIONS**

The parties hereto, the Public Disclosure Commission Staff, through its Interim Executive Director, Doug Ellis, and Respondent Aaron Reardon, submit this Stipulation as to Facts and Violations in this matter.

**JURISDICTION**

The Public Disclosure Commission 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.

**FACTS**

1. 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.
2. 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.

3. 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.

#### MITIGATING FACTORS

4. The Trade Development Alliance of Greater Seattle (TDA) is a collaboration of the City of Bellevue, City of Everett, City of Seattle, City of Tacoma, Greater Seattle Chamber of Commerce, Pierce County Government, Port of Everett, Port of Seattle, Port of Tacoma, Snohomish County Government, and union leadership to promote the trade interests of Greater Seattle, including King, Snohomish, and Pierce Counties in domestic and international markets. Mr. Reardon stated that Snohomish County officials have participated in several trade missions in the past as part of Snohomish County's membership in the TDA. Mr. Reardon stated that typically, such trade missions are billed by the TDA and paid directly by Snohomish County. He stated

that the 2009 trade mission was atypical in that the mission was paid for directly by the TDA and the Greater Seattle Chamber of Commerce without any billing to, or request for reimbursement from, Snohomish County.

5. Mr. Reardon stated that the March 2009 trade mission was organized by the TDA and the Greater Seattle Chamber of Commerce. He stated that there was never any attempt to conceal the nature of the 2009 trade mission or who was paying for travel expenses. Mr. Reardon stated that in March 2009 he gave interviews to The Seattle Times, The Daily Herald, King 5 TV, and local radio stations detailing every aspect of the trade mission, including the sponsors of the trip.
6. A March 10, 2009 media advisory from the Snohomish County Executive's Office was titled "*Reardon works to land direct Etihad flight at Sea-Tac.*" The press release stated that while on a trade mission to the United Arab Emirates, Mr. Reardon met with Etihad Airways officials and discussed the possibility of direct flights from Abu Dhabi to Sea-Tac Airport. The media advisory stated: "*Reardon currently is co-leading a trade mission sponsored by the Trade Development Alliance of Greater Seattle and the Greater Seattle Chamber of Commerce to the United Arab Emirates. His costs have been paid in full by the sponsor organizations.*"

#### LEGAL AUTHORITY

7. **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:

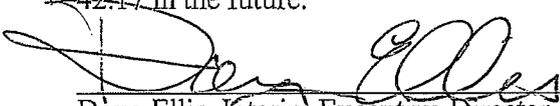
"(d) Payments by a governmental or nongovernmental entity of reasonable expenses incurred in connection with a speech, presentation, appearance, or trade mission made in an official capacity. As used in this subsection, "reasonable expenses" are limited to travel, lodging, and subsistence expenses incurred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

### VIOLATIONS

Respondent 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.

Respondent affirms his intention to comply in good faith with the provisions of RCW 42.17 in the future.

  
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Doug Ellis, Interim Executive Director  
Public Disclosure Commission

6/20/2011  
Date Signed

  
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Aaron Reardon  
Snohomish County Executive

6/20/2011  
Date Signed