



State of Washington
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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December 11, 2018

ASHLEY STUBBS
12 E 27TH AVE
SPOKANE, WA 99203

And delivered electronically to “astubbs19@gmail.com”

Subject: PDC Order, Case 39031

Dear Ashley Stubbs

Enclosed is a copy of the Public Disclosure Commission’s Order Imposing Fine that was entered in the above-referenced case. At the December 6, 2018, Final Order Reconsideration Hearing, the Commission waived the \$250 total civil penalty assessed against you.

Thank you for your prompt attention to this matter. If you have questions, please contact us by email at pdc@pdc.wa.gov.

Sincerely,

/s

Fox Blackhorn-Delph
Compliance Coordinator 2

Enclosure: Final Order

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

9 In re the Matter of Enforcement Action
10 Against:

PDC CASE NO. 39031

11 Ashley Stubbs,

FINAL ORDER

Respondent.

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13 **I. INTRODUCTION**

14 This matter was heard by the Washington State Public Disclosure Commission
15 (Commission) on December 6, 2018, at the Public Disclosure Commission Office, 711 Capitol
16 Way, Room 206, Olympia, Washington 98504. The hearing was held pursuant to Chapter 34.05
17 RCW, Chapter 42.17A RCW, and Chapter 390-37 WAC.

18 Commissioners present were Anne Levinson, Commission Chair (presiding); David
19 Ammons, Commission Vice-Chair; and Commissioner William Downing. Also present were
20 Assistant Attorney General John S. Meader representing the Commission; Fox Blackhorn-
21 Delph, PDC Compliance Coordinator; Tabatha Blacksmith, PDC Compliance Coordinator; and
22 Assistant Attorney General Chad Standifer on behalf of PDC Staff. Respondent Ashley Stubbs
23 participated telephonically. The proceeding was open to the public and recorded.

24 The Commissioners had before them the following materials:

- 25 • Enforcement Hearing Memorandum prepared by PDC Compliance Coordinator Tabatha
26

1 Blacksmith dated November 30, 2018;

- 2
- 3 • Freshdesk ticket log dated August 8, 2018, describing the initial complaint;
 - 4 • E-mail sent by PDC Staff to Respondent regarding the missing Personal Financial Affairs
5 Statement (F-1 report), dated August 17, 2018, and providing notice of the Brief
6 Adjudicative Proceeding on September 24, 2018;
 - 7 • E-mail to Respondent dated October 5, 2018, notifying her of the outcome of the Brief
8 Adjudicative Proceeding held September 24, 2018;
 - 9 • Note of phone request by Respondent for an appeal of the Initial Order dated October 26,
10 2018, and written confirmation from the Respondent dated October 29, 2018;
 - 11 • PDC Case No. 39031 cover letter and Order Imposing Fine against Respondent Ashley
12 Stubbs dated October 5, 2018;
 - 13 • Letter dated October 26, 2018, from Respondent Ashley Stubbs explaining why she did not
14 timely file her F-1.
 - 15 • Respondent's F-1 form received by the PDC on October 26, 2018.

16 The hearing concerned allegations that Respondent violated RCW 42.17A.700 by failing
17 to file a Personal Financial Affairs Statement (F-1 report) for calendar year 2017 no later than
18 April 16, 2018.

19 After reviewing the record, including the testimony by PDC Staff and the Respondent,
20 the Commission HEREBY ORDERS that the following Findings of Fact, Conclusions of Law,
21 and Final Order of the Commission be entered:

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23 II. FINDINGS OF FACT

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25 1. Respondent Ashley Stubbs is a former Professional Staff Member for the Washington
26 State House of Representatives. Her employment began in January, 2017.

1 2. The Respondent was required to file an F-1 report disclosing financial activities in
2 calendar year 2017 no later than April 16, 2018 and did not timely do so.

3 3. From April to June 2018, PDC staff sent seven e-mail reminders to the Respondent
4 concerning the F-1 filing requirement.

5 4. On July 16, 2018, PDC staff sent a warning letter by U.S. Mail, concerning the
6 Respondent's failure to file the F-1 report.

7 5. On August 16, 2018, PDC staff served the Respondent by U.S. Mail and e-mail with
8 a hearing notice for a Brief Adjudicative Proceeding to be held on September 24, 2018,
9 concerning failure to file the F-1 report.

10 6. On September 24, 2018, a Brief Adjudicative Proceeding was held in which the
11 Presiding Officer found the Respondent in violation of RCW 42.17A.700 for failing to file an
12 F-1 report for calendar year 2017. Ashley Stubbs was assessed a \$250 penalty in accordance
13 with WAC 390-37-143, the penalty schedule adopted by the Commission, which was payable
14 within 30 days of the date of the Order.

15 7. On October 26, 2018, Ashley Stubbs filed the missing F-1 report with the PDC.

16 8. On October 26, 2018 PDC staff received an e-mail from the Respondent requesting
17 review and waiver of the \$250 penalty from the Initial Order on the basis of ignorance of the
18 filing requirement after leaving the House of Representatives, family medical issues contributing
19 to the non-compliance, and failure to update her physical address or read e-mails until October
20 5, 2018. As the Commission was not scheduled to meet within 20 days of the request for review,
21 it was deemed denied and converted to a request for reconsideration under Chapter 390-37 WAC
22 and RCW 34.05.491(5).

23 9. Respondent has no previous violations.

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III. CONCLUSIONS OF LAW

1. The Commission has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the State campaign finance and disclosure law; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC.

2. RCW 42.17A.700 states in part: "After January 1st and before April 15th of each year, every elected official and every executive state officer shall file with the commission a statement of financial affairs for the preceding calendar year." Executive state officers include Professional Staff Members of the Legislature pursuant to RCW 42.17A.705(3).

3. Respondent Ashley Stubbs violated RCW 42.17A.700 by failing to file the F-1 report for calendar year 2017, no later than April 16, 2018.

IV. ORDER

Based upon the Findings and Conclusions, the Commission orders that:

1. The Initial Order is AMENDED and the \$250 total civil penalty is vacated due to the following mitigating circumstances: acknowledged responsibility for a good faith uncertainty about reporting requirements, family medical issues contributing to the non-compliance, and filing of the F-1 report before the reconsideration hearing.

2. Respondent Ashley Stubbs will file all required PDC reports in accordance with RCW 42.17A.755 and have no further violations of Chapter 42.17A RCW or Title 390 WAC within

1 four years of this order.

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3 The Executive Director is authorized to enter this Order on behalf of the Commission.

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5 So ORDERED this 11th day of December, 2018.

6 WASHINGTON STATE PUBLIC
7 DISCLOSURE COMMISSION

8 FOR THE COMMISSION:

9 
10 _____
11 Peter Lavalley
Executive Director

12 *A copy of this Order mailed and/or emailed to:*

13 Ashley Stubbs, Respondent
14 12 E. 27th Ave.
15 Spokane, WA 99203
16 astubbs19@gmail.com

17 Phil Stutzman, PDC Staff (phil.stutzman@pdc.wa.gov)

18 Chad Standifer, Assistant Attorney General (ChadS@atg.wa.gov)

19 I, Joselyn DePl, certify that I mailed and
20 emailed a copy of this order to the Respondent at their respective
21 address postage pre-paid on the date stated herein.

22 
23 Signed _____ Date 12.10.2019

1 **NOTICE: RECONSIDERATION**

2 Pursuant to the provisions of RCW 34.05.470 and WAC 390-37-150, you may file a Petition for
3 Reconsideration with the PDC within ten (10) days from the date this Final Order is served upon
4 you. Any Request for reconsideration must state the specific grounds for the relief requested.
5 Petitions must be delivered or mailed to the Washington State Public Disclosure Commission,
6 711 Capitols Way, Room 206, Box 40908, Olympia WA 98504-0908.
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8 **NOTICE: PETITION FOR JUDICIAL REVIEW**

9 You have the right to appeal this Final Order to Superior Court, pursuant to the Petition for
10 Judicial Review provisions of RCW 34.05.542. Any Petition for Judicial Review of this Final
11 Order must be filed with the court and also served upon both the Commission and the Office of
12 the Attorney general within thirty (30) days after the date this Final Order is served upon you.
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