



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

April 23, 2019

Delivered electronically to "sjfl3@comcast.net"

Subject: PDC Case 19192

Dear Steve Fields:

Below is a copy of an electronic letter sent to John Stilin concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to John Stilin, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter

PDC staff is reminding you that when providing a statement to the public or news media, a presumption of candidacy occurs even when such an announcement or correspondence is contingent upon a future occurrence or plan to run for election as established by WAC 390-05-200. Furthermore, this letter includes staff's expectation that during future campaigns, you will timely and accurately file the Candidate Registration (C-1 report) and Personal Financial Affairs Statement (F-1 report) within two weeks of becoming a candidate as required by RCW 42.17A.205 and RCW 42.17A.700.

If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Micaiah Ragins
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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April 23, 2019

Delivered electronically to "johnstilin@msn.com"

Subject: Complaint regarding Steven Fields, PDC Case 19192

Dear John C Stilin:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on May 23, 2017. Your complaint alleged that Steven Fields, a candidate seeking the office of Council Member for the City of Redmond, may have violated RCW 42.17A.205 for failure to timely and accurately file the Candidate Registration (C-1 report) within two weeks of declaring candidacy.

PDC staff reviewed your allegations, the applicable statutes, rules, and reporting requirements; the response provided by Steven Fields; and the applicable PDC reports filed by the Campaign, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On June 5, 2017, Steven Fields filed a Candidate Registration (C-1 report) declaring his candidacy for Council Member for the City of Redmond, and selecting the Full Reporting option. Steven Fields won the 2017 General Election with 55.52% of the vote.
- On December 20, 2016, the Redmond Reporter published an article stating that "Former Redmond mayoral candidate Steve Fields will run for one of two City Council positions that will be open next year." The article also included that "Fields has not said which position he is vying for yet."
- Steven Fields provided the following response: "At no time prior to filing on May 18th did I formally announce myself as a candidate, solicit or accept a contribution or spend money for this campaign; reserve space or purchase advertising to promote candidacy; authorize someone else to do any of these activities for me; or state publicly that I am seeking office; or file a declaration of candidacy."

- Steven Fields included with his response a copy of email communication from the Redmond Reporter news outlet. The emails demonstrated that on December 19th, 2016, Reporter Samantha Pak requested the following confirmation from Steven Fields: "The reason I am emailing you is Bob Yoder emailed us to let us know that you will be running for City Council. I just wanted to check in with you to confirm that this is true." Steven Fields replied to the reporter's email with the following: "Yes. I plan to run."
- Mr. Fields addressed the email communication in his response to the allegations for the PDC. In his accounting of the events, Steven Fields stated that "On December 19, 2016 I was unexpectedly contacted by the Redmond Reporter. I was asked by the reporter, Samantha Pak, if I was running for Redmond City Council. The reporter did not ask for a specific quote or indicate that this would result in a current article. I had previous informal conversations with this reporter during the Mayoral campaign. I assumed she was researching for potential future articles and would follow up once we were past the Holiday season and we were well within the 2017 election year. I responded that yes I was planning to run, but did not consider this a formal declaration similar to that made when I announced for Mayor."
- WAC 390-05-200 establishes that a public declaration of candidacy even if the candidacy is conditioned on a future occurrence shall "give rise to presumption that an individual is a 'candidate' as the term is defined in RCW 42.17A.005."

Based on these findings and the following facts, staff has determined that in this instance, the failure to timely file the Candidate Registration (C-1 report) does not amount to a material violation warranting further investigation since: (1) It is unclear from the evidence whether Steven Fields was aware that the Redmond Reporter would publish an announcement for his candidacy; (2) The announcement statement in the Redmond Reporter was not a direct quote from Steven Fields; (3) The Redmond Reporter article acknowledged that Steven Fields had not said which position he was vying for yet; (4) Mr. Fields demonstrated misunderstanding about the circumstances which give rise to candidacy; and (5) Steven Fields filed the C-1 and F-1 reports prior to brief adjudicative proceedings for delinquent candidates of the 2017 election.

PDC staff is reminding Steven Fields that when providing a statement to the public or news media, a presumption of candidacy occurs even when such an announcement or correspondence is contingent upon a future occurrence or plan to run for election as established by WAC 390-05-200. Furthermore, this letter includes staff's expectation that during future campaigns, Steven Fields will timely and accurately file the Candidate Registration (C-1 report) and Personal Financial Affairs Statement (F-1 report) within two weeks of becoming a candidate as required by RCW 42.17A.205 and RCW 42.17A.700.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case. If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Micaiah Ragins
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavaliee
Executive Director

cc: Steven Fields