

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

In the Matter of Enforcement Action  
Against:

PDC Case 100925

David Strader, Council Member for City  
of Milton

**STIPULATION AS TO FACTS AND  
VIOLATIONS**

Respondent

**I. INTRODUCTION**

The parties to this matter, namely, the Public Disclosure Commission Staff, through its Executive Director, Peter Frey Lavallee, and Respondent David Strader, Council Member for City of Milton, Respondent, submit this Stipulation as to Facts and Violations in this matter. The parties agree that the Commission has the authority to accept, reject or modify the terms of this Stipulation. The parties further agree that in the event the Commission suggests modification to any term of this agreement, each party reserves the right to reject that modification. In the event either party rejects a modification, this matter will proceed to hearing before the Commission.

**II. JURISDICTION**

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

**III. FACTS**

1. Respondent David Strader was a first-time candidate for public office in 2021 seeking the office of City Council Member, Position 5 in the City of Milton, Washington. Respondent

- David Strader submitted his Declaration of Candidacy on May 21, 2021, to the appropriate election(s) office, declaring his candidacy for City of Milton Council Member, Position 5.
2. On May 28, 2021, Respondent David Strader submitted his Voters' Pamphlet statement to the King County Elections office as a candidate for City Council Member, Position 5 in the City of Milton, Washington.
  3. On June 14, 2021, Respondent David Strader voluntarily submitted a signed Notice of Termination of Campaign Statement to the Public Disclosure Commission (PDC). In the Statement, he represented that he would not accept the office. He also represented that if he were to be elected and accept the office, the PDC could conduct enforcement for his failure to file statutory reports required by RCW 42.17A.
  4. On October 25, 2021, Respondent David Strader contacted the PDC to notify staff he missed the deadline to get his name off the ballot and wanted to know what the penalty would be if he accepts the office.
  5. On November 1, 2021, Respondent David Strader successfully filed/submitted his Candidate Registration (C-1) and Personal Financial Affairs Statement (F-1) reports. The C-1 and the F-1 reports were both filed approximately 149 days late, one day before the 2021 General Election.
  6. On November 9, 2021, PDC staff received a complaint that was filed against Respondent David Strader regarding his prior termination of candidacy, and his failure to timely file the required reports.
  7. On November 30, 2021, PDC staff received a response to the complaint from Respondent David Strader.
  8. On December 29, 2021, PDC staff sent an email to Respondent David Strader with follow-up questions based on his response to the complaint that was received by staff on November 30, 2021. Specifically, PDC staff asked Respondent David Strader if after signing the Notice of Termination of Candidacy Statement and withdrawing his candidacy, if he:
    - (I) Engaged in any campaign activities to support his candidacy?
    - (II) Met with, emailed, called or texted any voters of the City of Milton requesting they vote for him or support his candidacy?
    - (III) Produced/printed any political advertisement (campaign information/literature/signs or other materials) related to his candidacy?

- (IV) Posted any information about his candidacy on social media platforms?
- (V) Engaged in any of those activities between June 14, 2021, when he completed the Termination of Candidacy and October 20, 2021? AND
- (VI) What factor(s) prompted him to get back into the race after signing a Notice of Termination of Candidacy Statement on June 14, 2021?

9. On December 30, 2021, PDC staff received a response to the follow-up questions sent to Respondent David Strader on December 29, 2021. Mr. Strader indicated that he did not engage in any campaign activities to support his candidacy after signing the Notice of Termination of Candidacy Statement. In his response to the last follow-up question, "What factor(s) prompted you to get back into the race after signing a Notice of Termination of Candidacy Statement?" Respondent David Strader stated: "Several incidents at City Council meeting in the fall (listed below) resulted in my reevaluating my decision to not disclose my personal finances on the F-1 form, which was the reason I withdrew. As each incident occurred, my sense of lack of 'fair play' increased and eventually it overshadowed my privacy concerns, and at the November 1<sup>st</sup> meeting I had finally had enough. After the meeting I filled out the C1 and F1 forms, and the morning of November 2<sup>nd</sup> I called the PDC and followed up with an email."
10. On January 3, 2022, Respondent David Strader was sworn into office as the new City of Milton Council Member (Position 5), and he took office the same day.

### **STATUTORY AND RULE AUTHORITY**

**RCW 42.17A.205** states, in part: "Every political candidate shall file a statement of organization with the commission. The statement must be filed within two weeks after organization or within two weeks after the date the candidate first has the expectation of receiving contributions or making expenditures in any election campaign. Any material change in information previously submitted in a statement of organization shall be reported to the commission within ten days following the change."

**RCW 42.17A.700** states, in part: "Within two weeks of becoming a candidate, every candidate shall file with the commission a statement of financial affairs for the preceding twelve months."

### **VIOLATIONS**

Based on the facts set forth above, Respondent David Strader, City Council Member candidate for City of Milton, stipulates that he violated RCW 42.17A.205 and .700 by failing to

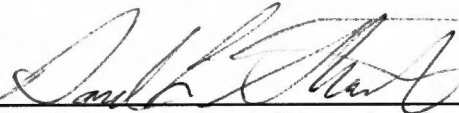
timely file Candidate Registration (C-1) and Personal Financial Affairs Statement (F-1) reports,  
as required by the statutory scheme.



Peter Frey Lavalley, Executive Director  
Public Disclosure Commission

01/14/2022

Date Signed



David Strader, Council Member for City of  
Milton

1-12-22

Date Signed