



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112

**Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

June 13, 2019

Delivered electronically to Dan Brady on behalf of Senator Ann Rivers at  
“dan@danbradylaw.com”

Subject: Complaint filed by Dmitri Iglitzin on behalf of the Washington State Democratic Party,  
PDC Case 30920

Dear Mr. Brady:

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

As noted in the letter to Mr. Iglitzin, the PDC has dismissed this matter in accordance with RCW  
42.17A.755(1) and will not conduct a more formal investigation into these allegations or take  
further enforcement action in this matter.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-  
601-2828, or by email at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s

Jennifer Hansen  
Compliance Officer

Endorsed by,

/s

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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June 13, 2019

Delivered electronically to Dmitri Iglitzin at "iglitzin@workerlaw.com"

Subject: Complaint regarding Senator Ann Rivers (2016 Campaign), PDC Case 30920

Dear Mr. Iglitzin:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on behalf of the Washington State Democratic Party on November 17, 2017. Your complaint alleged that Ann Rivers, incumbent State Senator in Legislative District 17 and candidate for re-election in 2016, may have violated RCW 42.17A.235 and 42.17A.240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign during the 2016 primary and general elections.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Dan Brady on behalf of his client, Senator Ann Rivers; PDC Case #15-094; and the applicable PDC reports filed by Respondent, to determine whether the record supports a finding of one or more violations.

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

- Ann Rivers filed a Candidate Registration (C-1 report) on September 12, 2013, declaring her candidacy for State Senator in Legislative District 17 in 2016, and choosing the "Full Reporting" option.
- The 2016 Ann Rivers Senate Campaign was the subject of a previous complaint filed in January 2016 that alleged violations of RCW 42.17A.235 and 42.17A.240 for failure to timely and accurately file C-3 and C-4 reports for the 2016 election. At its December 8, 2016 regular meeting, the Commission found the 2016 Rivers Campaign in violation of RCW 42.17A and accepted a Stipulation to Facts, Violations and Penalty (PDC Case #15-094). The Campaign was assessed a total civil penalty of \$4,000.
- In his response, Mr. Brady, stated that the Stipulation and Final Order issued in PDC Case #15-094 already addressed most of the allegations in your complaint and explained the circumstances of the Rivers Campaign during the time of the alleged violations.
- PDC staff reviewed the allegations from PDC Case #15-094 and your complaint and found that the majority of the allegations were included in Stipulation and Final Order.
- Your complaint alleged late filing of three (3) C-3 reports and three (3) C-4 reports that were not considered in the original complaint. Although staff's review found that the reports did appear to be late, they were submitted prior to the November 8, 2016 general election and before the Stipulation and Final Order were signed. Staff does not believe

that the \$4,000 penalty assessed would have been increased if the additional six late reports were considered.

Staff's review of the Stipulation language from PDC Case #15-094 and Mr. Brady's response to the allegations in your complaint, found evidence to suggest that Senator Rivers understands her statutory filing obligations and that her campaign did not intentionally file inaccurate reports or attempt to deprive the public of information related to her 2016 campaign.

Based on these findings staff has determined that, in this instance, failure to timely file a total of six additional C-3 and C-4 reports prior to the November 8, 2016 general election that were not considered in the Stipulation to Facts, Violations and Penalty accepted by the Commission on December 8, 2016, does not warrant further investigation or enforcement action.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Dan Brady, Attorney for Senator Ann Rivers (2016 Campaign)