



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 • Website: www.pdcc.wa.gov

Memorandum

To: Public Disclosure Commission
From: Jordan Campbell, Compliance Coordinator
Date: August 14, 2024
Subject: Christopher Moore Enforcement Hearing Memorandum: PDC Case 158062

Allegations:

PDC staff alleges that Christopher Moore (the Respondent), an elected City Council Member for the City of Orting, violated RCW 42.17A.700 by failing to file a Personal Financial Affairs Statement (F-1 report) for calendar year 2023, due not later than April 15, 2024.

Background and Prior Violations:

- The Respondent was most recently elected to City Council Member for City of Orting in 2021 and took office January 1, 2022.
- Between March 12 and April 23, 2024, PDC staff sent seven email reminders to all elected and appointed officials regarding their missing F-1 reports for calendar year 2023.
- On August 12, 2024, PDC staff emailed and mailed the respondent a hearing notice regarding the missing report for calendar year 2023. This hearing notice was sent to the respondent's email and address of record.
- As of August 14, 2024, the Respondent has not filed an F-1 covering calendar year 2023.

Prior Violations

First Violation (PDC Case 110455)

- The Respondent, who was a City Council Member for the City of Orting as of Jan. 1, 2022, failed to file an F-1 report for the calendar year 2021, which was due no later than April 15, 2022.
- At the September 1, 2022, Brief Enforcement Hearing, the Respondent was found in violation of RCW 42.17A.700 and assessed a \$250 penalty with \$125 suspended.

- As of August 14, 2024, the missing F-1 report for calendar year 2021 has not been filed and the \$250 penalty has not been paid.
- The penalty was sent to collections in February 2023.

Second Violation (PDC Case 144241)

- The Respondent, who was a City Council Member for the City of Orting in 2022, failed to file a F-1 report for calendar year 2022, which was due no later than April 17, 2023.
- At a full adjudicatory hearing Nov. 16, 2023, the Respondent was found in violation of RCW 42.17A.700 and assessed a \$1,000 penalty with \$500 suspended.
- As of August 14, 2024, the F-1 report for calendar year 2022 has not been filed and the \$1,000 penalty has not been paid.
- The penalty was sent to collections in July 2024.

Additional Information

- Per WAC 390-37-143(5), cases “will automatically be scheduled before the full commission for an enforcement action when the respondent:
(a) Was found in violation during a previous reporting period;
(b) The violation remains in effect following any appeals; and
(c) The person has not filed the disclosure forms that were the subject of the prior violation at the time the current hearing notice is being sent.”

Staff Recommendation:

Staff recommends the Commission find that the Respondent violated 42.17A.700 by failing to timely file an F-1 report for calendar year 2023, and:

1. Assess the Respondent a civil penalty for a second occasion of a violation heard at a full adjudicatory hearing where the report was not filed before the date of the hearing per WAC 390-37-182 to be made payable within 30 days of the date of the Order. The base penalty range for this fact pattern is \$1000 to \$2000: and
2. Require the respondent to file the missing F-1 report for calendar year 2023 within 30 days of the date of the Order.