



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

TO: Commissioners

FROM: Philip E. Stutzman, Director of Compliance

DATE: October 14, 2009

SUBJECT: Cody Benson, Case No. 10-024

You are being provided with a copy of the Notice of Administrative Charges for Cody Benson, Case No. 10-024. I am also providing you with a spreadsheet showing comparable cases for late-filing when a brief enforcement hearing was moved to a hearing before the full commission because of the number of prior late-filed reports. I will be presenting the case.

Staff Recommendation

Staff recommends that the Commission find a violation of RCW 42.17.170 for late-filing of the Monthly Lobbyist Expense Report (PDC form L-2) and assess an appropriate penalty within the Commission's penalty authority range which is up to \$1,700 for a single violation. This is the fourth occasion of a late-filed L-2 during 2009 for Ms. Benson. She stipulated to a violation for January 2009, and was found in violation at a Brief Enforcement Hearing for February and March 2009.

For January through May 2009, Ms. Benson reported receiving compensation from her employer, Washington Association of Realtors, and from Robin Appleford, a lobbyist for whom she provided lobbying assistance. The L-2 reports filed for June and July indicate that lobbied only for Washington Association of Realtors. No lobbying expenses, other than compensation, were reported.