



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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December 21, 2022

Heidi Cao  
604 SW 206th St  
Normandy Park, WA 98166

And delivered electronically to [heidihcao@gmail.com](mailto:heidihcao@gmail.com)

Subject: PDC Order, Case 110479

Dear Heidi Cao,

Enclosed is a copy of the Public Disclosure Commission's Final Order that was entered in the above-referenced case.

At the December 8, 2022 Full Enforcement hearing, the Commission reviewed the penalty assessed at the September 1, 2022 Brief Enforcement Hearing.

The result of this review is that the violation of RCW 42.17A.700 is ***Affirmed***, however the Commission has ***Vacated*** the penalty in this case.

Thank you for your prompt attention to this matter. If you have questions, please contact us by email at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically Signed by Jordan Campbell*  
PDC Staff

Enclosure: Final Order

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

9 In Re: The Matter of Enforcement Action  
10 Against:

11 HEIDI CAO,

12 Respondent.  
13

PDC CASE NO. 110479

FINAL ORDER ON  
RECONSIDERATION

14  
15 This matter was heard remotely by the Washington State Public Disclosure Commission  
16 (Commission) on December 8, 2022, by telephonic and online streaming access. Respondent  
17 Heidi Cao requested reconsideration of the Presiding Officer's Order entered on September 29,  
18 2022, following a Brief Enforcement Hearing (Brief Adjudicative Proceeding) on September 1,  
19 2022, in this matter. The hearing was held in accordance with Chapters 34.05 and 42.17A RCW,  
20 and Chapter 390-37 WAC.

21 Commissioners present both telephonically and online were Nancy Isserlis, Commission  
22 Vice-Chair (presiding); and Commissioners William Downing, Allen Haywood, and Jocelyn  
23 Cooney. Also present both telephonically and online were Assistant Attorney General John S.  
24 Meader representing the Commission, Senior Assistant Attorney General Chad Standifer and  
25 Assistant Attorney General Susie Giles-Klein, representing PDC Staff, and Jordan Campbell,  
26 PDC Compliance Coordinator. Notice was provided to the Respondent and she appeared on her

1 own behalf. The proceeding was open to the public and recorded.  
2

3 The Commissioners had before them the following materials:

- 4 • Case memorandum dated November 30, 2022, prepared by Jordan Campbell, PDC  
5 Compliance Coordinator;
- 6 • Brief Enforcement Hearing Notice, served July 25, 2022;
- 7 • Initial Order Imposing Fine, entered September 29, 2022;
- 8 • Respondent's F-1 report filed October 19, 2022;
- 9 • Respondent's written request for reconsideration, dated October 19, 2022;
- 10 • Reconsideration Hearing Notice, served November 23, 2022.

## 11 12 **I. FINDINGS OF FACT**

13 This matter involves Respondent's request that the Commission reconsider an Initial  
14 Order entered on September 29, 2022, resulting from an Initial Hearing on September 1, 2022,  
15 regarding Heidi Cao, a former Professional Staff member with the House of Representatives  
16 whose term of employment ended October 29, 2021. The Presiding Officer at the Brief  
17 Adjudicative Proceeding found the Respondent in violation of RCW 42.17A.700 for failure to  
18 timely file a Personal Financial Affairs Statement (F-1 Report) with the Public Disclosure  
19 Commission no later than April 15, 2022. At the September 1, 2022, hearing, an Order was  
20 entered imposing a \$250 penalty, with \$125 suspended, which the Respondent now requests the  
21 Commission reconsider. The Respondent has no prior violations with the PDC.  
22

- 23 1. In March and April of 2022, PDC staff sent email reminders to all elected and  
24 appointed officials regarding their missing F-1 reports for calendar year 2021.  
25  
26

2. On July 25, 2022, PDC staff mailed and emailed the Respondent a hearing notice for a Brief Adjudicative Proceeding (Brief Enforcement Hearing) to be held on September 1, 2022. The hearing notice was sent to the Respondent's official mail and email address of record for House staff.
3. At the Brief Enforcement Hearing held on September 1, 2022, the Respondent was found in violation of RCW 42.17A.700 for failure to timely file the missing F-1 Report no later than April 15, 2022, and was assessed a \$250 penalty consistent with WAC 390-37-143, the Brief Enforcement Hearing penalty schedule adopted by the Commission. The Presiding Officer suspended \$125 of the \$250 penalty conditioned upon the Respondent filing the missing F-1 report and paying the non-suspended \$125 penalty within 30 days of the Initial Order being entered.
4. On September 29, 2022, the Respondent was served with the September 1, 2022, Initial Order memorializing the Commission's ruling to the Respondent's mailing and email address of record which were the official addresses for House staff.
5. Respondent filed the missing F-1 report for calendar year 2021 on October 19, 2022.
6. On October 19, 2022, Respondent contacted PDC staff by email to appeal the penalty assessed in the Initial Order. She requested reconsideration on the grounds she was not aware of the filing requirement due to her not having

1 access to her House email account and that PDC records did not have her  
2 correct contact information.

- 3
- 4 7. On November 23, 2022, PDC staff served the Respondent by mail and email  
5 with a hearing notice for a December 8, 2022, Reconsideration Hearing before  
6 the Public Disclosure Commission, along with instructions on how to  
7 participate in the hearing remotely.  
8

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## 10 **II. CONCLUSIONS OF LAW**

- 11 1. The Commission has jurisdiction over this proceeding pursuant to Chapter  
12 42.17A. RCW, the State campaign finance and disclosure law; Chapter 34.05  
13 RCW, the Administrative Procedure Act; and Title 390 WAC.  
14
- 15 2. Pursuant to RCW 42.17A.700, an elected or appointed official who held office  
16 in 2021, or took office in 2021, was required to file an F-1 Report, disclosing  
17 financial information for the calendar year 2021, no later than April 15, 2022.  
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## 20 **III. ORDER**

21 This Order on Reconsideration will be the Final Order. After consideration of the  
22 mitigating and aggravating factors, the Findings of Fact, and the Conclusions of Law, the  
23 Initial Hearing Order imposing a \$250 civil penalty, with \$125 suspended, is MODIFIED as  
24 follows:

- 25 1. Respondent Heidi Cao is found to have violated RCW 42.17A.700 by failing to  
26 timely file her F-1 report no later than April 15, 2022.

2. Respondent's civil penalty of \$250 is VACATED.

SO ORDERED this 21<sup>st</sup> day of December, 2022.

WASHINGTON STATE PUBLIC  
DISCLOSURE COMMISSION

FOR THE COMMISSION:

Signed Electronically by Nancy Isserlis  
Nancy Isserlis, Vice-Chair (Presiding),  
Public Disclosure Commission

*This order sent by email to:*

Heidi Cao, Respondent  
heidihcao@gmail.com

Jordan Campbell,  
PDC Compliance Coordinator,  
pdc@pdc.wa.gov

I, Jordan Campbell, certify that I emailed a copy of this  
order to the Respondent at his respective email address.

Electronically signed by Jordan Campbell December 21, 2022  
Signed \_\_\_\_\_ Date \_\_\_\_\_

**NOTICE: PETITION FOR JUDICIAL REVIEW**

You have the right to appeal this Final Order to Superior Court, pursuant to the Petition for Judicial Review provisions of RCW 34.05.542. Any Petition for Judicial Review of this Final Order must be filed with the court and also served upon both the Commission and the Office of the Attorney general within thirty (30) days after the date this Final Order is served upon you.