

[Deanhach](#)

replied

(Mon, 17 Oct 2022 at 9:20 PM)

To: "PDC Support" <pdcc@pdc.wa.gov>

External Email

Thank you for the opportunity to respond to Allied Law Group's complaint against me. My 2021 campaign for Clyde Hill City Council was my first time running for office. I opted for mini-reporting to keep things simple. This is the first citizen complaint that has ever been filed against me; I believe this relates to an ongoing land use dispute I have had with a neighbor, but I am not sure.

The complaint challenges my F-1 report in two ways, first based on an unused LLC, and then based on a supposed debt owed to the City. The additional challenge to my campaign reporting is groundless given that I opted for mini-reporting, as PDC staff recognized. I address each of these three issues below in further detail.

1. Business ownership

I formed "Dean Hachamovitch LLC" several years ago for potential use in relation to my consulting work, but I have never actually used it for anything. As it has been inactive and unused, I simply did not think of reporting it on the F-1. I apologize for this inadvertent omission. Last week I amended my F-1 to add the LLC, and I will be sure to include it in my future F-1 filings.

To be proactive, I also recently contacted my financial advisor to confirm I was not missing anything else. My advisor identified two 529 Plan accounts I created for the benefit of my niece and nephew. As 529 Plans are meant for the education of separate beneficiaries, I did not think of them as my own money and thus did not think to include them on the F-1. The amounts at issue are also relatively minor in the context of my overall reporting. I apologize for this omission and have also included these accounts in my amended F-1.

2. Debt reporting

In relation to a land use decision, I previously pursued an administrative appeal against the City of Clyde Hill, which concluded in 2021. After the appeal was resolved, the City Attorney at the time sought to charge me attorney fees in addition to the City's customary fees and costs. I paid to the City all the customary fees and costs I owed for the appeal, but I disagreed that I owed any attorney fees. My attorney sent a letter disputing that portion of the demand as unlawful. (Separately, the Municipal Research and Services Center of Washington confirmed that I did not owe attorney fees.) Subsequently, both the interim City attorney and new City Attorney agreed, and the new City Attorney rescinded the demand. At no time did I have an enforceable legal obligation to pay the City attorney fees.

When I filled out my F-1 I did not consider the City Attorney's demand a debt and so did not include it. In closely reviewing the PDC's online guidance regarding what constitutes debt for purposes of an F-1, I still do not believe that it qualified. The examples listed in the guidance include a "judgment against you" and "notes you have co-signed." The former City Attorney's demand for attorney fees did not rise to the level of a judgment, nor did I ever acknowledge it as a valid request. I believe the fact that it was subsequently rescinded only confirms it was not valid and did not qualify as any reportable debt or obligation of mine. I would be happy to provide supporting documentation on this issue if desired.

3. Campaign finances

I appreciate PDC staff recognizing that the challenge to my financial reporting lacks foundation given that I opted for mini-reporting. In answer to your request for confirmation, for my 2021 campaign I did not receive any contributions and my expenses totaled \$2,420.27, well under the cap.

Thank you again for the opportunity to respond to this complaint. As I mentioned, this is my first time in public office, and I have done my best to follow the PDC's rules and guidance. I appreciate and will follow any feedback in my future reporting.

Sincerely,
Dean Hachamovitch