



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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

Public Disclosure Commission Statement of Understanding
Andrew Ashiofu
PDC Case 113113

I, Andrew Ashiofu, hereby acknowledge that during my 2022 election campaign for State Representative in the 37th Legislative District, I violated the following laws and rules:

- **RCW 42.17A.405(2) and (14) and WAC 390-05-400** by accepting \$2,000 in over-limit contributions for the August 2, 2022 primary election when the campaign used general election contributions for the primary election;
- **WAC 390-17-300(5)** by spending \$2,000 in general election contributions for the primary election when to do so caused the general election contributors to exceed their contribution limit for the primary election;
- **WAC 390-17-300(6)** by failing to return \$2,000 in general election contributions after losing in the primary election; and
- **RCW 42.17A.235 and .240** by filing multiple inaccurate reports of contributions and expenditures during and after the 2022 primary election, reflecting, (1) anticipated monetary contributions as actual deposited contributions, and (2) large debt forgiveness as over-limit in-kind contributions when there was no loan, debt, debt forgiveness, or over-limit in-kind contribution.

The facts are as follows:

- Andrew Ashiofu was a first-time candidate for State Representative in the 37th Legislative District during the 2022 election cycle. He hired Jeanne Legault, an experienced treasurer, to receive contributions, make expenditures, and file accurate reports with the Public Disclosure Commission. Mr. Ashiofu lost in the primary election and was required to return all general election contributions.
- Ms. Legault made the decision to spend \$2,000 in general election contributions to pay primary election expenses, resulting in the general election contributions becoming primary election contributions that were over-limit because the general election

contributors had already made maximum \$1,000 primary election contributions. The campaign was unable to return the general election contributions, consisting of \$1,000 from Agatha Ashiofu and \$1,000 from Rachel Marshall.

- Ms. Legault filed multiple inaccurate reports of contributions and expenditures during and after the 2022 primary election, including (1) reporting receipts of \$1,900 in monetary contributions that were not received, at a time when the campaign was looking for a way to return \$2,000 in general election contributions; and (2) reporting a debt of \$11,875 for consulting services that did not occur, and later reporting the debt as forgiven, and as an over-limit in-kind contribution. These incorrect, misleading reports were eventually amended after the election to correctly show that the monetary contributions were not received and that there was no debt or over-limit in-kind contribution for consulting services.

I would like to avoid the time and expense of a Brief Adjudicative Proceeding (Brief Enforcement Hearing). Therefore, in lieu of a hearing, I acknowledge that I violated Washington State law and rules as described above and agree to enter into this *Statement of Understanding* (SOU) to resolve the above matter with the Public Disclosure Commission.

In accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143, I agree to pay a \$500.00 penalty for the acknowledged violations of RCW 42.17A.405(14); WAC 390-17-300(5); WAC 390-17-300(6); and RCW 42.17A.235 and .240 for accepting \$2,000 in over-limit primary election contributions; spending \$2,000 in general election contributions for the primary election; failing to return \$2,000 in general election contributions after losing in the primary election; and filing multiple inaccurate reports of contributions and expenditures during the 2022 election campaign.

I understand that, by signing this SOU, I acknowledge the violations of Chapter 42.17A RCW and Title 390 WAC set forth above and waive my right to a hearing in this matter. I further understand that signing this SOU and returning it to the PDC with a payment for the \$500.00 civil penalty will resolve the issues of accepting over-limit contributions, spending general election contributions for the primary election, failing to return general election contributions after losing in the primary election, and filing multiple inaccurate reports of contributions and expenditures during the 2022 election campaign as indicated above.

Matthew Lang on behalf of Andrew Ashiofu

Date Signed

Please make your check or money order payable to the “**Washington State Treasurer**” and be sure to include the PDC Case Number 113113 in the memorandum field.

Kindly mail or deliver this SOU and your payment to one of the following addresses by no later than April 16, 2024.

Regular mail:

**Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908**

Overnight mail or in-person delivery:

**Public Disclosure Commission
711 Capitol Way S, STE 206
Olympia, WA 98501-1267**