

**Jeff Lyon**

replied (Fri, 20 Jun 2025 at 9:20 PM)

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

External Email

Ms. Townsend,

Please find Democratic Woodinville's response, attached.

Thanks, Jeff



June 20th, 2025

**Public Disclosure Commission (PDC)**

Attn: Compliance & Enforcement Division  
711 Capitol Way, Room 206  
PO Box 40908  
Olympia, WA 98504-0908

**Ref:** Case 174386

Compliance Officer Townsend,

On June 3rd, 2025, the PDC received a complaint from Janet Weisel ("Complainant") enumerating concerns over a billboard rented by Democratic Woodinville and allocated in support of Woodinville City Council Candidate Rachel Best-Campbell on May 26th, 2025. In summary:

- The Complainant alleged that Best-Campbell did not disclose an alleged in-kind contribution of \$10,000 for a billboard rented by Democratic Woodinville (presumably at the intersection of 131st Ave NE and NE 175th St, aka "Panel 5124").
- The Complainant alleged that this billboard was reported in a C-4 report for *Jeff Lyon for Woodinville City Council*, a campaign committee independent of this PAC.
- The Complainant alleged that this *"leads the public to believe that the billboard she is featured on was paid by her own money."*

**These allegations are materially false.** Facts are as follows:

- On April 30th, 2025, Democratic Woodinville made an independent expenditure of \$5,000 for two billboards supporting Best-Campbell starting on May 26th, 2025, one of which was Panel 5124. This was reported by Democratic Woodinville in a C-6 filing (#13154) on May 1st, 2025 (*see attached*).
- Best-Campbell had no obligation to report the PAC's independent expenditure.
- The billboard rentals reported by *Jeff Lyon for Woodinville City Council* are for billboards unrelated to Panel 5124 and not paid for by this PAC.

- No reasonable person is led to believe that the billboard was paid for by Best-Campbell as C-6 reports are available to the public on the PDC's website and the legally required disclosures are present on the ad copy.

The PDC on review of the Complainant's complaint alleged a violation of RCW 42.17A.320 for *"failure to provide sponsor identification on political advertising."* This allegation was presumably derived from a photograph provided by the Complainant showing the billboard obscured by foliage:



Figure 1. Panel 5124 obscured by foliage, provided by Complainant.



The photo provided by the Complainant (*Figure 1*) is not representative of the actual appearance of the billboard. The following photographs taken on May 29th, 2025 (four days prior to the date of this complaint) show the billboard completely unobstructed to a person viewing the board from the sidewalk on foot (*Figure 2*). or head-on in traffic, moving in the direction the billboard is facing (*Figure 3*):



*Figure 2. View of Panel 5124 on foot.*



*Figure 3. View of Panel 5124 in traffic.*

The Complainant's photo is using a creative angle taken from an adjacent street using one of the sidewalk trees to make it appear as if the billboard does not have the legally required disclosures. **RCW 42.17A.320** requires all written political advertising to have the sponsor's name and address, top five contributors, and the words "*No candidate authorized this ad*" in this case of an independent expenditure. The printer proof for this billboard is as follows (*Figure 4*):



Visit [woodinville.vote/endorsements](http://woodinville.vote/endorsements)

# Rachel Best-Campbell

Reelect to Woodinville City Council



 No candidate authorized this ad  
Paid for by Democratic Woodinville Sponsored by Jeff Lyon  
15257 127th Pl NE, Woodinville, WA 98072  
Top 5 contributors: Jeff Lyon, Fmr Mayor Gary Harris,  
Fmr Mayor Elaine Cook

Red Line does not print. It represents the 3" safety area. Please verify critical elements are within the safety area.

Figure 4. Printer proof for Panel 5124.

**RCW 42.17A.320** requires the disclosure to be *“in at least ten-point type, or in type at least ten percent of the largest size type used in a written advertisement.”* The words “Best-Campbell” are in 160 point font at 216 ppi and the disclosure was originally written in 16 point font, and then later **increased by Lamar to their higher standard** of 3% of billboard height. The text of this disclosure reads:

*No candidate authorized this ad  
Paid for by Democratic Woodinville Sponsored by Jeff Lyon  
15257 127th Pl NE, Woodinville, WA 98072  
Top 5 contributors: Jeff Lyon, Fmr Mayor Gary Harris, Fmr Mayor Elaine Cook*

The wording, placement, and size of this disclosure **exceeds requirements** under RCW and PDC guidance.

Based on these facts, it appears that the Complainant submitted this complaint with actual malice as they:

- Had access to the full billboard.
- Knowingly chose an angle that concealed required disclosure text.



- Submitted this misleading evidence as part of an official complaint to trigger an investigation or penalty under false pretenses.

***This PAC respectfully requests*** that you dismiss this complaint and remind the Complainant of their obligations under **RCW 42.17A.485** to provide accurate, complete, and truthful information to the Commission, including ensuring that any evidence submitted fairly represents the facts in question.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line.

Jeff Lyon, Chairperson  
Democratic Woodinville



Form  
**C6**  
4.2023

13154

5/1/2025

Reporting Form for: (check one)

Instructions on Page 3

- ☒ **INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$1,000 or more**  
☐ **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$2,000 or more**  
☐ **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$2,000 or more**

1. Name and complete postal mailing address of sponsor:

Democratic Woodinville Sponsored by Jeffrey Lyon  
15257 127th Pl NE  
Woodinville, WA 98072

E-mail

jeffrey.lyon@gmail-

Telephone

2. Itemize expenditures of more than \$200 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
04/30/25	05/26/25	LAMAR ADVERTISING COMPANY 3601 6TH AVE S SEATTLE, WA 98134	BILLBOARD ADVERTISING	\$5,000.00

Expenditures \$200 or less not itemized above \$ \$0.00

Amount or Value  *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total this report	\$ \$5,000.00
	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ \$5,000.00

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Rachel Best-Campbell,	City Council Member/City Of Woodinville		<input checked="" type="checkbox"/> <input type="checkbox"/>	\$ \$5,000.00	\$ \$5,000.00
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$

Continued on attached sheet ☐

**Filer Name:****4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a) ☐ An individual using only personal funds.
- b) ☐ An individual using personal funds and/or funds received from others.
- c) ☐ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ☐ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) ☒ A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ☐ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ☐ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

**5. Sources giving in excess of \$250 for the electioneering communication:**

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
		<b>TOTAL FUNDS RECEIVED</b>	<b>\$ 0.00</b>

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature
	Printed Name <b>JEFF LYON</b>
	Street address <b>15257 127TH PL NE</b>
	City/State/Zip <b>WOODINVILLE WA 98072</b>
	Date Signed <b>05/01/25</b>
*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	