

<b>Respondent Names</b>
Jeffrey A. Lyon and Democratic Woodinville
<b>Complainant Name</b>
Kathy McInroy
<b>Complaint Description</b>
<p>Kathy McInroy</p> <p>Fri, 1 Aug 2025 at 2:16 PM</p> <p>See attached</p>
<b>What impact does the alleged violation(s) have on the public?</b>
See attached
<b>List of attached evidence or contact information where evidence may be found</b>
See attached
<b>List of potential witnesses with contact information to reach them</b>
See attached
<b>Certification (Complainant)</b>
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

Public Disclosure Commission  
711 Capitol Way S. #206  
P.O. Box 40908  
Olympia, WA 98504

Dear Commissioners:

I write to submit a PDC Complaint against Jeffrey A. Lyon and Democratic Woodinville under RCW 42.17A.755 and RCW 42.17A.775. Lyon and Democratic Woodinville have violated the Fair Campaign Practices Act (FCPA), Chapter 42.17A RCW.

Jeffrey Lyon has poured more than \$100,000 into a political committee that he alone controls.

Lyon is also 2025 candidate for City Council in the City of Woodinville City and has donated \$50,000 to his own campaign. Lyon is a candidate for City Council Member Position 1 which is not contested in the primary election. Democratic Woodinville is a political committee registered on May 10, 2024 with the PDC.

This letter is a citizen action complaint made pursuant to RCW 42.17A.775.

**Violation #1: Knowing Establishment, Use, Direction, or Control of Multiple Political Committees by Jeff Lyon**

RCW 42.17A.440 provides that “A candidate may not knowingly establish, use, direct, or control more than one political committee for the purpose of supporting that candidate during a particular election.” A “political committee” is “any person . . . having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition.” RCW 42.17A.005(41). Jeff Lyon for Woodinville City Council, filed with the PDC on March 25, 2025, is a “political committee” that receives contributions and makes expenditures on Jeff Lyon, the candidate’s, behalf. Likewise, Democratic Woodinville is a “political committee” that receives contributions and makes expenditures on multiple candidates’ behalf, including Lyon.

Lyon “established,” “uses,” “directs,” and “controls” both Jeff Lyon for Woodinville City Council and Democratic Woodinville. Lyon is the “Candidate” and “Treasurer” for Jeff Lyon for Woodinville City Council. [Lyon C-1]. Likewise, Lyon is the “Chairperson” and “Treasurer” of Democratic Woodinville. [Democratic Woodinville C-1]. Both political committees support Lyon’s candidacy for Woodinville City Council. For example, on February 19, 2025, Democratic Woodinville spent \$8,910 on “Website and e-mail banner advertising promoting . . . [a] slate endorsement” that included Jeff Lyon for Woodinville City Council. Democratic Woodinville’s website also represents that Lyon “formed this PAC in 2024.”

Lyon’s actions constitute a violation of RCW 42.17A.440.

## **Violation #2: Campaign Contributions Exceeding the Statutory Limit by Democratic Woodinville to Lyon**

RCW 42.17A.405(2) provides that “No person, other than a bona fide political party or a caucus political committee, may make contributions to a candidate for a . . . city council office . . . that in the aggregate exceed \*eight hundred dollars.” WAC 390-05-400.405(2) increased this limit to \$1,200 in 2023.

Democratic Woodinville has made expenditures exceeding \$1,200 on Lyon’s behalf. For example, as mentioned above, on February 19, 2025, Democratic Woodinville spent \$8,910 on “Website and e-mail banner advertising” that supported Jeff Lyon, among others. Even if Lyon only benefitted from one-fifth of that expenditure, that would still exceed the \$1,200 contribution limit.

No exemption allows Democratic Woodinville to have made these excessive contributions. First, there is no valid exemption under RCW 42.17A.405(15). These excessive contributions are directly associated with Lyon as an individual candidate and are not “independent expenditures.” An “independent expenditure” does not include expenditures that are made in support of a candidate by any “person who has received the candidate’s encouragement or approval to make the expenditure.” RCW 42.17A.005(30)(a). As explained above, Democratic Woodinville is controlled by Lyon and so has his “encouragement” and “approval” to make expenditures on his behalf. Jeff Lyon cannot make an independent expenditure to benefit his own campaign because, as the name suggests, he cannot be independent of his own candidacy.

Second, Democratic Woodinville is not a “bona fide political party” or a “caucus political committee.” Democratic Woodinville is not part of the “governing body of the state organization” of the Washington State Democratic Party. *See* RCW 42.17A.005(6). Likewise, Democratic Woodinville is not “organized and maintained by members” of the Washington State Democratic Party. *See* RCW 42.17A.005(9).

Democratic Woodinville’s actions constitute a violation of RCW 42.17A.405(2).

## **Conclusion**

Given the above, I respectfully request that the PDC investigate both Jeff Lyon and Democratic Woodinville’s lack of compliance with the FCPA and issue an appropriate enforcement order under RCW 42.17A.755(1)(b). The PDC must act quickly as the general election is in a few short months and Lyons has flooded the small town of Woodinville with more illegal campaign contributions than all other candidates combined.