



August 5th, 2025

Public Disclosure Commission (PDC)

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

Ref: Case 177021

Compliance Officer Townsend,

On August 1st, 2025, the PDC received a complaint with three allegations. Our response is provided in corresponding sections. Additionally, this PAC is self-identifying a fourth violation for the PDC's consideration as part of this investigation.

Allegation One: violations of RCW 42.17A.235, .240 for failure to disclose contributions & expenditures on reports timely and accurately

The complainant did not explicitly allege violations of **RCW 42.17A.235 or .240**, but implied that Democratic Woodinville failed to properly disclose a coordinated expenditure benefiting Lyon's campaign. The expenditure in question was an \$8,910 payment made on February 19, 2025, for "website and e-mail banner advertising promoting [a] slate endorsement" that included Lyon. The complainant argues that because Lyon controls both Democratic Woodinville and his own candidate committee, the expenditure should have been reported as an in-kind contribution and disclosed by both committees.

However, the advertising in question meets the legal definition of a slate card or sample ballot as described in **WAC 390-17-030**. A slate exemption applies when a political committee distributes communications that include:

- Identification of each candidate (e.g., name or photo);
- The office or position currently held (if applicable);
- The office sought;



- Party affiliation; and
- Information about voting hours and locations.

The banner advertisements funded by the \$8,910 expenditure included only the names of endorsed candidates and sponsor identification. Because the format adhered to the narrow scope of the slate exemption, the expenditure did not constitute an in-kind contribution to any individual candidate under RCW 42.17A.235 or .240 and was properly reported on C-4 as a committee expense by Democratic Woodinville.

An example banner is provided for reference:



No violation of RCW 42.17A.235 or .240 occurred.

Allegation Two: violations of RCW 42.17A.255 for failure to disclose independent expenditures timely and accurately

The complainant did not explicitly cite **RCW 42.17A.255**, but alleged that Democratic Woodinville made expenditures supporting Jeff Lyon's candidacy that could not be considered independent, due to Lyon's dual role as both candidate and PAC officer. They suggest that because Lyon is chair and treasurer of Democratic Woodinville, any expenditure promoting him, such as the \$8,910 banner ad described in Allegation One, should have triggered a disclosure as a contribution, not as an independent one. Implicit in the complaint is the assertion that if any such expenditure were reported as independent, it would be inaccurate under RCW 42.17A.255.



However, Democratic Woodinville did not file any C-6 reports claiming the February 19, 2025 expenditure or similar communications as independent expenditures under RCW 42.17A.255. The committee properly reported the spending as a general committee expenditure on its C-4 report, consistent with its role in supporting a slate of endorsed candidates. Since the spending was neither presented nor reported as independent, and instead qualified under the slate exemption outlined in **WAC 390-17-030**, the statute governing independent expenditure reporting does not apply.

No violation of RCW 42.17A.255 occurred.

Allegation Three: violations of RCW 42.17A.440 for using more than one committee to support a candidate during an election

The complainant alleged that Jeff Lyon violated **RCW 42.17A.440** by simultaneously directing both his candidate committee and Democratic Woodinville, a political committee that made expenditures supporting his candidacy. The complaint points to Lyon's roles as chair and treasurer of Democratic Woodinville and asserts that because the PAC included Lyon in its slate advertising, it functioned as a second committee established or used to support his election.

RCW 42.17A.440 prohibits a candidate from knowingly establishing, using, directing, or controlling more than one political committee "for the purpose of supporting that candidate during a particular election campaign." However, the statute includes an explicit exception:

"This does not prohibit: (1) In addition to a candidate's having his or her own political committee, the candidate's participation in a political committee established to support a slate of candidates that includes the candidate."

Democratic Woodinville's stated and actual purpose in the 2025 Primary and General elections is to support a slate of candidates, not Lyon individually. The committee's expenditures either support all candidates equally or advertise individual candidates other than Lyon as independent expenditures. Because the committee was not established or used for the purpose of supporting Lyon, but rather to support a group of candidates that includes him, its activity falls squarely within the statutory exemption.

No violation of RCW 42.17A.440 occurred.

Self Identified: violation of RCW 42.17A.205 for failure to timely disclose material changes to the statement of organization



Democratic Woodinville filed its initial statement of organization (C-1pc) with the PDC on 2024-03-10. This occurred outside of an election cycle where the PAC or its officers had any participation or reportable affiliations. Several material changes occurred after this date:

1. On 2025-03-01, the PAC's Chairperson Jeff Lyon declared candidacy for Woodinville City Council Position 1 in the 2025 election and filed a C-1 to form the campaign committee Jeff Lyon for Woodinville City Council.
2. On 2025-05-09, the PAC's internal Advisory Committee passed a resolution (2025-02) to endorse four candidates for Woodinville City Council.
3. On 2025-06-25, the PAC's internal Advisory Committee passed a resolution (2025-03) modifying its endorsements for Woodinville City Council.
4. On 2025-07-08, the PAC filed a C-6 (filing 13177) disclosing an Independent Expenditure Ad in opposition to a candidate for Woodinville City Council.

Under **RCW 42.17A.205(4)**, an amendment to the statement of organization was due within 10 days of each of these material changes. These omissions were inadvertent. The required disclosures with regard to each candidate supported or opposed were reported in C-4 and C-6 filings, but not C-1pc amendments. An amendment to the PAC's C-1pc was filed to correct this deficiency on 2025-08-05 and now accurately reflects its purpose and affiliations.

Conclusion

This PAC respectfully requests that the PDC dismiss allegations (1), (2), and (3) with regard to violations of RCW 42.17A.235, .240, .255, and .440 and evaluate the appropriate action with regard to the self-identified violations of RCW 42.17A.205.

Respectfully submitted,

Jeff Lyon, Chairperson
Democratic Woodinville