



**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](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

January 11, 2019

Delivered electronically to Phil Lloyd, Treasurer of Families Yes, at “[phil@seattlecfo.com](mailto:phil@seattlecfo.com)”

Subject: Complaint filed by Conner Edwards, PDC Case 42538

Dear Phil Lloyd:

Below is a copy of an electronic letter sent to Conner Edwards concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Edwards, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of including complete sponsor identification on political advertisement, specifically the “Top Five Contributors” to Families Yes. PDC staff expects in the future that you will review all political advertisement to ensure it includes complete sponsor identification, including the “Top Five Contributors” when required, in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by email at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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January 11, 2019

Delivered electronically to Conner Edwards at “cg.edwards53@gmail.com”

Subject: Complaint regarding Families Yes, PDC Case 42538

Dear Conner Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 20, 2018. Your complaint alleged that Families Yes, a 2018 election year committee, may have violated RCW 42.17A.320 for failure to identify the “Top Five Contributors” to the committee in political advertisement mail piece they sponsored.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; and the response provided by Phil Lloyd, Treasurer for Families Yes, to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- On December 29, 2017, Families Yes, submitted a Political Committee Registration (PDC form C-1pc) registering as an election year only committee supporting the Seattle Families and Education Levy (Seattle Proposition One) in the 2018 general election, and listing Phil Lloyd as Treasurer.
- The committee, Families Yes, sponsored political advertisement including a color mailer, electronic advertisements and advertisements on social media. Two versions of the mailer were distributed with sponsor identification disclosing who paid for the advertisement but failed to include the required “Top Five Contributors” statement followed by the five donors making the largest contributions in excess of \$700 during the previous twelve months.
- In his response to the complaint, Committee Treasurer, Phil Lloyd, stated that the “Top Five Contributors” information was omitted due to an oversight made by their direct mail vendor, Cerilion N4 Partners. Mr. Lloyd attached a letter from the vendor confirming that the two subsequent mailers were corrected to include the “Top Five Contributors” prior to distribution.
- Families Yes was registered as an election year committee supporting a similar Seattle Education Levy in 2011 and does not have previous violations of PDC requirements.

Although the committee, Families Yes, sponsored two mailers that did not include the “Top Five Contributors” as required at the time they were distributed, the committee followed up with their direct mail vendor as soon as the oversight was identified through receipt of the complaint and

promptly made corrections to two additional mailers and other political advertisement to ensure compliance

Based on these findings staff has determined that, in this instance, failure to include the required “Top Five Contributors” statement with the list of donors on two mailers they sponsored does not amount to an actual violation warranting further investigation.

PDC staff is reminding Families Yes about the importance of included complete sponsor identification, including the “Top Five Contributors” when required on all future political advertisements they sponsor in accordance with the statutes and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Phil Lloyd, Treasurer for Families Yes