



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

Sandi Lytle
634 Del Guzzi Dr,
Port Angeles WA 98362

November 6, 2024

And delivered electronically to EMAIL

Subject: PDC Order, Case 155492 Reconsideration

Dear Sandi Lytle,

Enclosed is a copy of the Public Disclosure Commission's Order Imposing Fine that was entered in the above-referenced case.

At the October 24, 2024 Full Enforcement hearing, the Commission reviewed the penalty assessed at the July 11, 2024 Brief Enforcement Proceeding

The result of this request for reconsideration is that the request is Approved. on the condition that the Respondent submit a termination statement which has been supplied to the Respondent by mail (mailed October 28, 2024) within 30 days of the date of this order which is December 5, 2024. As such, the order dated August 9, 2024 has been Vacated on the conditions outlined above have been met. If the conditions outlined above are not met, the \$500 Penalty will be due immediately.

Thank you for your prompt attention to this matter. If you have questions, please contact us by email at pdcc@pdc.wa.gov

Sincerely,

Electronically Signed by Jordan Campbell

PDC Staff

Enclosure: Final Order

1
2
3
4
5
6
7
8 **BEFORE THE PUBLIC DISCLOSURE COMMISSION**
OF THE STATE OF WASHINGTON

9 In Re: The Matter of Enforcement Action
10 Against:

11 SANDI LYTLE,

12 Respondent.
13
14

PDC CASE NO. 155492

FINAL ORDER ON
RECONSIDERATION

15 This matter was heard by the Washington State Public Disclosure Commission
16 (Commission) on October 24, 2024, by in-person, telephonic, and online streaming access.
17 Respondent Sandi Lytle requested reconsideration of the Presiding Officer's order entered on
18 August 9, 2024, following a Brief Enforcement Hearing (Brief Adjudicative Proceeding) on July
19 11, 2024, in this matter. The hearing was held in accordance with Chapters 34.05 and 42.17A
20 RCW, and Chapter 390-37 WAC.

21 Commissioners present both in-person and online were Allen Hayward, Commission
22 Chair (presiding); J. Robert Leach, Commission Vice-Chair; and Commissioners Nancy Isserlis,
23 Douglass North, and James Oswald. Also present both in-person and online were Assistant
24 Attorney General John S. Meader representing the Commission, Senior Assistant Attorney
25 General Chad Standifer representing PDC Staff, and Jordan Campbell, PDC Compliance
26 Coordinator. Notice was provided to the Respondent and she did appear on her own behalf.

1 The Commissioners had before them the following materials:

- 2 • Case memorandum dated October 16, 2024, prepared by Jordan Campbell, PDC
- 3 Compliance Coordinator;
- 4 • Brief Enforcement Hearing Notice, served June 18, 2024;
- 5 • Initial Order Imposing Fine, entered August 9, 2024;
- 6 • Respondent's request for reconsideration, dated September 22, 2024;
- 7 • Reconsideration Hearing Notice, served October 8, 2024.

8
9 **I. FINDINGS OF FACT**

10 Respondent requested that the Commission reconsider an Initial Order entered on August
11 9, 2024, resulting from an Initial Hearing on July 11, 2024. The matter involves Sandi Lytle, a
12 candidate for County Charter Review Commissioner in Clallam County, who failed to timely
13 file a Personal Financial Affairs Statement (F-1), and a Candidate Registration (C-1 Report),
14 which were due to be filed within two weeks of candidacy or no later than May 24, 2024. The
15 Respondent has no prior violations with the PDC.

- 16
- 17 1. Between May 7, 2024, and May 22, 2024, PDC staff sent email reminders to all
18 candidates seeking office for the calendar year 2024 with outstanding C-1
19 and/or F-1 reports.
20
 - 21 2. On May 24, 2024, the Respondent contacted the PDC regarding terminating her
22 candidacy. Between May 24, 2024, and June 30, 2024, PDC staff made
23 numerous attempts to provide the Respondent with a termination statement.
24 The Respondent did not respond to these attempts.
25
26

3. On June 18, 2024, PDC staff mailed and emailed the Respondent a hearing notice for a Brief Adjudicative Proceeding (Brief Enforcement Hearing) to be held on July 11, 2024. The hearing notice was sent to the Respondent's mailing and email address of record.
4. At the Brief Enforcement Hearing held on July 11, 2024, the Respondent was found in violation of RCW 42.17A.205 for failure to timely file the missing Candidate Registration (C-1 Report) and the missing Personal Financial Affairs Statement (F-1 Report) within two weeks of candidacy or no later than May 24, 2024, and was assessed a \$500 penalty consistent with WAC 390-37-143, the Brief Enforcement Hearing penalty schedule adopted by the Commission.
5. On August 9, 2024, the Respondent was served with the July 11, 2024, Initial Order memorializing the Commission's ruling to the Respondent's mail and email addresses of record.
6. On September 22, 2024, the Respondent requested reconsideration because she had spoken to the County and the PDC in order to remove her name from the ballot, had difficulty accessing the Internet and electronically submitting the required termination statement, and had health problems including hand surgery.
7. On October 10, 2024, PDC staff served the Respondent by mail and email with a hearing notice for an October 24, 2024, Reconsideration Hearing before the

1 Public Disclosure Commission, along with instructions on how to participate in
2 the hearing remotely.
3

4 **II. CONCLUSIONS OF LAW**

- 5 1. The Commission has jurisdiction over this proceeding pursuant to Chapter
6 42.17A. RCW, the State campaign finance and disclosure law; Chapter 34.05
7 RCW, the Administrative Procedure Act; and Title 390 WAC.
8
- 9 2. Pursuant to RCW 42.17A.205, a candidate for an election year must file a
10 Candidate Registration (C-1 Report) within two weeks of candidacy or no later
11 than May 24, 2024.
12
- 13 3. Pursuant to RCW 42.17A.700, a candidate for elected office in 2024 was
14 required to file a Personal Financial Affairs Statement (F-1) within two weeks
15 of becoming a candidate or not later than May 24, 2024.
16

17 **III. ORDER**

18 This Order on Reconsideration will be the Final Order. After consideration of the
19 mitigating and aggravating factors, the Findings of Fact, and the Conclusions of Law, the
20 request for Reconsideration is GRANTED, and the Initial Order imposing a civil penalty of
21 \$500, served on August 9, 2024, is VACATED on the following conditions:
22

- 23 1. a. A PDC Termination Statement is signed by the Respondent and
24 includes a promise that even if elected the Respondent would not serve
25 in the position of County Charter Commissioner for Clallam County.
26

1 The signed statement shall be filed with the PDC within 30 days of the
2 date of this Order and paper copy filing is authorized.
3

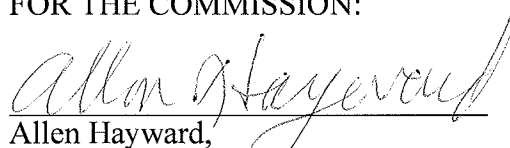
4 b. The Respondent remains in full compliance with all PDC
5 reporting requirements and is not found to have committed any further
6 violations of Chapter 42.17A RCW or Title 390 WAC within four years
7 of the date of this Final Order on Reconsideration. The suspended penalty
8 shall not be assessed based solely upon any remediable violation, minor
9 violation, or error classified by the Commission as appropriate to address
10 by a technical correction.
11

- 12 2. If the Respondent fails to meet the conditions in Section III(1) of this order within
13 30 days of the date of this order, the vacated penalty for calendar year 2024 shall
14 immediately become due and the matter may be sent to collection or brought to
15 Superior Court as allowed by law without further action by the Commission.
16

17 SO ORDERED this 6th day of November 2024.

18 WASHINGTON STATE PUBLIC
19 DISCLOSURE COMMISSION

20 FOR THE COMMISSION:

21 
22 Allen Hayward,
Chair, Public Disclosure Commission

23 *This order sent by email to:*

24 Sandi Lytle, Respondent
25 634 Del Guzzi Drive
26 Port Angeles, WA 98362
Lyttlesandra59@gmail.com

I, Jordan Campbell, certify that I emailed and mailed a
copy of this order to the Respondent at his respective
email and mailing address.

Jordan Campbell
Signed

November 6, 2024
Date

1 Jordan Campbell,
2 PDC Compliance Coordinator,
3 pdc@pdc.wa.gov

4 **NOTICE: PETITION FOR JUDICIAL REVIEW**

5 You have the right to appeal this Final Order to Superior Court, pursuant to the Petition for
6 Judicial Review provisions of RCW 34.05.542. Any Petition for Judicial Review of this Final
7 Order must be filed with the court and also served upon both the Commission and the Office of
8 the Attorney general within thirty (30) days after the date this Final Order is served upon you.
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26