



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

**Memorandum**

To: Public Disclosure Commission

From: Tanya Mercier, Compliance Officer

Date: October 3, 2024

Subject: Leon A. Lawson Enforcement Hearing Memorandum: PDC Case 155613

**Allegations:**

PDC staff alleges that Leon A. Lawson, a candidate for Governor for State of Washington in the 2024 election, violated RCW 42.17A.235 and .240 by failing to timely and accurately file Receipts and Expenditure Summary (C-4) reports for election year 2024.

**Background and Prior Violations:**

- On July 8, 2023, Leon A. Lawson (the “Respondent”) filed with the Public Disclosure Commission (PDC) a Candidate Registration (C-1) for the Full Reporting option. On May 6, 2024, Mr. Lawson filed a declaration of candidacy with the Washington State Secretary of State for election year 2024 for the office of Governor for Washington State.
- As a candidate for the office of Governor for Washington State, the Respondent appeared on the 2024 Primary Election ballot. The Respondent, under the Full Reporting option, had a reporting requirement to file, at a minimum, a C-4 for May 2024, a 21-day C-4, a 7-day C-4, and a Post-election C-4.
- The Respondent filed a C-4 report on June 10, 2024, for the period of July 8, 2023, to April 30, 2024, showing no expenditures or contributions. On May 6, 2024, the Respondent paid a candidate filing fee of \$1982.57 but failed to file a C-4 for the period of May 1, 2024, to May 31, 2024, due June 10, 2024.
- Between July 15, 2024, and September 11, 2024, PDC Staff sent eight email communications reminding the Respondent that the 21-day, 7-day, and post-election reports were due or missing.

- On June 11, 2024, the PDC received the first of four complaints against the Respondent for missing reports. The Respondent was notified about each complaint but never responded. On July 23, 2024, PDC Staff emailed an Initial Hearing notice and on July 29, 2024, the PDC conducted an Initial Hearing. The Respondent did not attend the hearing. Then on September 10, 2024, PDC Staff emailed a Brief Enforcement Hearing Notice alleging violations of RCW 42.17A.235 and .240 for missing C-4 reports in election year 2024. The hearing notice was sent to the Respondent's email of record. **(Exhibit 1)** On September 20, 2024, PDC Staff mailed the Brief Enforcement Hearing Notice and this Memorandum to the Respondent's mailing address of record.
- As of September 20, 2024, the Respondent has not filed the required C-4 reports covering the 2024 Primary Election.

**Aggravating and Mitigating Factors:**

- The Respondent lost in the Primary Election.
- The Respondent has no prior violations with the PDC.

**Additional Information:**

Per WAC 390-37-143

(3) The presiding officer has authority to suspend all or a portion of an assessed penalty under the conditions to be determined by that officer including, but not limited to, payment of the nonsuspended portion of the penalty within five business days of the date of the entry of the order in that case.

(5) The presiding officer may direct a matter to the full commission if the officer believes one thousand dollars would be an insufficient penalty or the matter warrants consideration by the full commission.

**Staff Recommendation:**

Staff recommends the Commission find that The Respondent violated 42.17A.235 and .240 by failing to timely file the following C-4 reports:

- A C-4 report covering May by the deadline of June 10, 2024; and
  - The 21-day C-4 report that was due by July 16, 2024; and
  - The 7-day C-4 report that was due by July 30, 2024; and
  - The Post-election C-4 report that was due by September 10, 2024.
1. Assess the Respondent a civil penalty for a first violation where the reports were not filed before the date of the hearing, per WAC 390-37-143 **(Exhibit 2)**, to be made payable within 30 days of the date of the Order. The base penalty range for this fact pattern is \$150; and
  2. Require Leon A. Lawson to file all required C-4 reports for the 2024 Primary Election within 30 days of the date of the Order.

**Exhibit List:**

- Exhibit 1: Hearing Notice for October 3, 2024, dated September 10, 2024
- Exhibit 2: WAC 390-37-143 Penalty Schedule
- Exhibit 3: Key Dates: 2024 Primary Election



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Leon Aaron Lawson  
3816 Aberdeen Lake Rd.  
Aberdeen, WA 98520

September 10, 2024

Also delivered electronically to Leon Aaron Lawson at [leon@leonlawson.com](mailto:leon@leonlawson.com) and [dogconleon@yahoo.com](mailto:dogconleon@yahoo.com)

Subject: Brief Adjudicative Proceeding (aka Brief Enforcement Hearing) Notice; PDC  
Case Number 155613

Dear Leon Lawson:

Per RCW 42.17A.110 and RCW 42.17A.755, the Public Disclosure Commission (PDC) will hold a Brief Adjudicative Proceeding (BAP) concerning the allegation that Leon Aaron Lawson violated RCW 42.17A.235 and .240 by failing to timely and accurately file C-4 reports for election year 2024. Specifically, PDC Staff alleges that Leon Lawson:

1. Paid a candidate filing fee of \$1982.57 on May 6, 2024, and did not file the required C-4 report covering the month of May by the deadline of June 10, 2024; and
2. Candidate failed to file the required 21-day C-4 report by July 16, 2024; and
3. Candidate failed to file the required 7-day C-4 report by July 30, 2024; and
4. Candidate failed to file the required post-election C-4 by September 10, 2024.

Under the Brief Enforcement Hearing rules, the Presiding Officer has the authority to assess a civil penalty in accordance with [WAC 390-37-143](#), a penalty schedule adopted by the Commission.

**HEARING INFORMATION**

Date and time: **October 3, 2024 at 1:30PM**

Place: Remotely from Olympia  
Live Audio and Online Transmission

Presiding Officer: Allen Hayward, Chair, PDC, or their designee

Authority: RCW 42.17A and WAC 390

## **HOW TO AVOID THE HEARING**

To avoid the Brief Adjudicative Proceeding, please take **all** the following steps no later than **September 26, 2024**:

1. File a C-4 report covering the month of May; and
2. File the 21-day C-4 and the 7-day C-4 report; and
3. If you have accepted any contributions between the start of your campaign and the end of August 2024, file all applicable C-3 reports; and
4. File the Post-Election C-4 report.
5. Let your assigned Compliance Officer know when the reports have been filed.

*Online filing resources can be found [here](#) on the PDC website. If you need one-on-one assistance with filing in the online filing system, please call 360-753-1111 and request a Filer Assistance staff.*

## **PARTICIPATING IN THE HEARING VIA MICROSOFT TEAMS OR BY PHONE**

The Brief Enforcement Hearing will be audio and video recorded. The Presiding Officer and PDC Staff will attend in-person or remotely via Microsoft Teams video conferencing platform.

➤ **PLEASE READ the entire instructions below *prior* to the day of the hearing if you plan to participate via MS Teams.**

Please note that you may be prompted to download the MS Teams app or use a supported browser (Microsoft Edge or Google Chrome) for best performance.

Anyone wishing to participate in the hearing remotely must follow the instructions below and join the meeting **promptly at 1:30PM on October 3, 2024**. Please remain in the meeting until the Presiding Officer calls your name and case number. After your case has been heard, you may leave the meeting.

*Please note that you must stay muted at all times except while your case is being heard.*

**Join on your computer, mobile app, or by phone:**

### **Join the meeting now**

Meeting ID: 225 032 650 595

Passcode: rJT5m5

### **Dial in by phone**

[+1 564-999-2000,,38896473#](#) United States, Olympia

[Find a local number](#)

Phone conference ID: 388 964 73#

If you choose to participate in the hearing remotely, please be aware that you may be waiting in the queue for an unknown period of time while cases are being heard and you may have a limited amount of time to speak. If a lengthier response time is needed, please consider submitting written participation materials prior to the hearing (see below).

### **INTERPRETER**

If a party or witness to this proceeding speaks limited English or is hearing-impaired, and needs an interpreter, a qualified interpreter will be appointed at no cost to you. Please inform us at least five business days before the hearing or no later by **September 26, 2024** if you require an interpreter for this proceeding and/or translation of its written materials in a language other than English.

Please contact us by email at [pdca@pdc.wa.gov](mailto:pdca@pdc.wa.gov) or call us at (360) 753-1111 or 1-877-601-2828 to request an interpreter.

### **SUBMITTING WRITTEN MATERIALS**

In advance of the Brief Enforcement Hearing, you may provide a written response describing the facts of your case for consideration by the Presiding Officer, including any circumstances or mitigating factors you would like considered. Please submit your written response so it is received by the PDC no later than **September 26, 2024**.

### **SUBMITTING THE REPORTS**

You are strongly encouraged to complete and submit the required reports, if applicable to your case, online prior to the Brief Adjudicative Proceeding so they are received by the PDC no later than **September 26, 2024**. The reports must be submitted electronically.

If you have any questions about the hearing process prior to the hearing date, please contact PDC Staff by email at [pdca@pdc.wa.gov](mailto:pdca@pdc.wa.gov) – and be sure to reference your case number in the subject line of the email. Information can also be found on the PDC site [here](#).

Sincerely,

PDC Staff  
Compliance and Enforcement Division

**WAC 390-37-143 Brief enforcement hearings (brief adjudicative proceeding)—Penalty schedule.** The presiding officer may assess a penalty up to one thousand dollars upon finding a violation of chapter 42.17A RCW or Title 390 WAC.

(1) Base penalty amounts:

Violation	1st Occasion	2nd Occasion	3rd Occasion
Failure to timely file an accurate and complete statement of financial affairs (F-1):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
Candidate's failure to timely file an accurate and complete registration statement (C-1)/statement of financial affairs (F-1):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150 per report	\$150 - \$300 per report	\$300 - \$600 per report up to \$1,000
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150 per report	\$300 per report	\$600 per report up to \$1,000
Failed to file report by date of enforcement hearing.	\$250 per report	\$500 per report	consideration by full commission
Failure to timely file an accurate and complete lobbyist monthly expense report (L-2):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
Failure to timely file an accurate and complete lobbyist employer report (L-3):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
Failure to timely file accurate and complete disclosure reports:			
Political committee registration (C-1pc).	\$150	\$300	\$600
Statement of contributions deposit (C-3).	\$150	\$300	\$600
Summary of total contributions and expenditures (C-4).	\$150	\$300	\$600
Independent expenditures and electioneering communications (C-6).	\$150	\$300	\$600
Last minute contribution report (LMC).	\$150	\$300	\$600
Out-of-state committee report (C-5).	\$150	\$300	\$600
Annual report of major contributors (C-7).	\$150	\$300	\$600
Failure to timely file accurate and complete reports disclosing lobbying activities:			
Lobbyist registration (L-1).	\$150	\$300	\$600
Public agency lobbying report (L-5).	\$150	\$300	\$600
Grass roots lobbying report (L-6).	\$150	\$300	\$600

Violation	1st Occasion	2nd Occasion	3rd Occasion
Failure to file electronically.	\$350	\$650	\$1,000
Exceeding contribution limits.	\$150	\$300	\$600
Exceeding mini reporting threshold.	\$150	\$300	\$600
Failure to comply with political advertising sponsor identification requirements.	\$150	\$300	\$600
Failure to include required candidate's party preference in political advertising.	\$150	\$300	\$600
Failure to comply with other political advertising requirements, RCW 42.17A.330 through 42.17A.345.	\$150	\$300	\$600
Use of public facilities to assist a campaign for election or promote a ballot measure.	\$150	\$300	\$600
Treasurer's failure to timely file an accurate and complete annual treasurer's report (T-1):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000

"Occasion" means established violation. Only violations in the last five years will be considered for the purpose of determining second and third occasions.

(2) In determining the appropriate penalty, the presiding officer may consider the nature of the violation and aggravating and mitigating factors, including:

(a) Whether the respondent is a first-time filer;

(b) The respondent's compliance history for the last five years, including whether the noncompliance was isolated or limited in nature, indicative of systematic or ongoing problems, or part of a pattern of violations by the respondent, or in the case of a political committee or other entity, part of a pattern of violations by the respondent's officers, staff, principal decision makers, consultants, or sponsoring organization;

(c) The respondent's unpaid penalties from a previous enforcement action;

(d) The impact on the public, including whether the noncompliance deprived the public of timely or accurate information during a time-sensitive period, or otherwise had a significant or material impact on the public;

(e) The amount of financial activity by the respondent during the statement period or election cycle;

(f) Whether the late or unreported activity was significant in amount or duration under the circumstances, including in proportion to the total amount of expenditures by the respondent in the campaign or statement period;

(g) Corrective action or other remedial measures initiated by respondent prior to enforcement action, or promptly taken when noncompliance brought to respondent's attention;

(h) Good faith efforts to comply, including consultation with PDC staff prior to initiation of enforcement action and cooperation with PDC staff during enforcement action, and a demonstrated wish to acknowledge and take responsibility for the violation;

(i) Personal emergency or illness of the respondent or member of his or her immediate family;



(j) Other emergencies such as fire, flood, or utility failure preventing filing;

(k) Sophistication of respondent or the financing, staffing, or size of the respondent's campaign or organization; and

(l) PDC staff, third-party vendor, or equipment error, including technical problems at the agency preventing or delaying electronic filing.

(3) The presiding officer has authority to suspend all or a portion of an assessed penalty under the conditions to be determined by that officer including, but not limited to, payment of the nonsuspended portion of the penalty within five business days of the date of the entry of the order in that case.

(4) If, on the third occasion, a respondent has outstanding penalties or judgments, the matter will be directed to the full commission for consideration.

(5) The presiding officer may direct a matter to the full commission if the officer believes one thousand dollars would be an insufficient penalty or the matter warrants consideration by the full commission. Cases will automatically be scheduled before the full commission for an enforcement action when the respondent:

(a) Was found in violation during a previous reporting period;

(b) The violation remains in effect following any appeals; and

(c) The person has not filed the disclosure forms that were the subject of the prior violation at the time the current hearing notice is being sent.

[Statutory Authority: RCW 42.17A.110(1) and 2018 c 304. WSR 18-24-074, § 390-37-143, filed 11/30/18, effective 12/31/18. Statutory Authority: RCW 42.17A.110(1) and 42.17A.570. WSR 18-10-088, § 390-37-143, filed 5/1/18, effective 6/1/18. Statutory Authority: RCW 42.17A.110. WSR 17-03-004, § 390-37-143, filed 1/4/17, effective 2/4/17.]

# Key Dates: 2024

These dates are also found on the PDC's [Calendar of Events](#).

[Key dates for 2024 special elections are also available.](#)

Within two weeks of organizing or becoming a candidate	Register the campaign. (Candidates also file an F-1.)
January 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Dec. 31
February 12	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Jan. 31
March 11	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Feb. 29
April 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through March 31
May 10	File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through April 30
May 6-10	Declaration of candidacy filing week
June 3	Begin filing C-3 reports weekly, each Monday, for deposits made during previous 7 days (Monday through Sunday)
June 10	File monthly C-4, if necessary, that covers the period through May 31
June 24	Last day before primary election to change from mini to full reporting without special circumstances (See <a href="#">WAC 390-16-125</a> )
July 16	Candidates appearing on the primary election ballot file a C-4 that covers the period June 1 through July 15. So do committees supporting or opposing candidates.
July 27 - August 5	Candidates not on the primary election ballot and committees only supporting or opposing general election ballot measures file monthly reports in June, July and August. These reports due on the 10th of the following month.
July 30	Campaign books open for public inspection
July 30 - August 5	Candidates appearing on the primary election ballot and committees participating in the primary file a C-4 that covers the period July 16 through July 29
July 30 - August 5	Special reports due if candidate or committee receives contributions of \$1,500 or more from a single source, or committee makes contributions of \$1,500 or more.
AUGUST 6	NOTE: Does not constitute authority to exceed applicable local or state contribution limit
	<b>PRIMARY ELECTION DAY</b>

August 30	Last day before general election to change from mini to full reporting without special circumstances (See <a href="#">WAC 390-16-125</a> ) Post-primary C-4 due that covers the period July 25 through Aug. 31
September 10	Candidates not on the primary election ballot and committees that did not participate in the primary file a report for the month of August
October 15	21-day pre-general C-4 report due - report for the period Sept. 1 through Oct. 14. <ol style="list-style-type: none"> <li>1. Special reports due if a candidate or political committee receives contributions of \$1,500 or more from a single source, or if a political committee makes a contribution of \$1,500 or more.</li> <li>2. A candidate for statewide office may not accept contributions from a single source exceeding \$75,000 in the aggregate unless it is from the state committee of a bona fide major or minor political party.</li> <li>3. A candidate for another office or a political committee may not receive contributions from a single source exceeding \$7,500 in the aggregate unless it is from the state committee of a bona fide major or minor political party. The exception is ballot measure committees, which may receive larger contributions.</li> </ol>
October 15 - November 4	
October 26 - November 4	Campaign books open for public inspection
October 29	7-day pre-general C-4 report due - report for the period Oct. 15 through Oct. 28.
November 4	Last Monday that weekly C-3 reports must be filed for general election
NOVEMBER 5	<b>GENERAL ELECTION DAY</b>
December 10	Post-general C-4 due that covers Oct. 29 through Nov. 30. File C-3s that have not been filed for any deposits made in November.
January 10, 2025	End of election cycle C-4 due that covers Dec. 1 through Dec. 31. File C-3s for any deposits made in December.