Respondent Name
City of Edmonds
Complainant Name
Theresa Campa Hutchinson
Complaint Description
Theresa Hutchison reported via the portal *(Thu, 27 Mar 2025 at 12:59 PM)* See attached file.
What impact does the alleged violation(s) have on the public?
This supplemental submission provides additional evidence supporting the complaint filed with the Washington Public Disclosure Commission (PDC case #167685) regarding alleged improper use of public funds by the City of Edmonds and its contracted public affairs firm, Liz Loomis Public Affairs (LLPA), in promoting annexation to South County Fire (SCF). Below are specific concerns related to the Edmonds Fire/EMS Cost Calculator and associated materials on the City's website.
List of attached evidence or contact information where evidence may be found
See attached file.
List of potential witnesses with contact information to reach them
Jim Ogonowski (james.m.ogonowski@hotmail.com. Dave Teitzel (kathydave52@hotmail.com.
Certification (Complainant)
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.

Regarding Complaint Filed Against the City of Edmonds and Liz Loomis Public Affairs (LLPA)
Date: March 21, 2025
Subject: Case No. 167685: Additional Evidence of Misleading Communication Practices and Advocacy
To Whom It May Concern,

This supplemental submission provides additional evidence supporting the complaint filed with the Washington Public Disclosure Commission (PDC case #167685) regarding alleged improper use of public funds by the City of Edmonds and its contracted public affairs firm, Liz Loomis Public Affairs (LLPA), in promoting annexation to South County Fire (SCF). Below are specific concerns related to the Edmonds Fire/EMS Cost Calculator and associated materials published on the City's website:

1. Misleading Terminology in Cost Calculator
The Edmonds Fire/EMS Cost Calculator, created by LLPA and presented on the City's website, employs ambiguous terminology that misrepresents mandatory tax payments as voluntary contributions:

- The term "General Levy Contribution to Fire Service Contract" inaccurately describes a required tax payment as a "contribution," implying voluntariness. This language obscures the compulsory nature of property taxes and may mislead voters into believing these payments are discretionary.
- Such phrasing appears designed to soften perceptions of taxes, potentially influencing voter attitudes toward annexation.

2. Selective Presentation of Tax Data
The calculator isolates fire and EMS levies while explicitly excluding other property tax components, such as city, county, hospital, school, library, and state taxes. This selective presentation:

- Limits the scope of information provided to voters, focusing solely on fire/EMS costs while omitting broader tax impacts.
- Prevents voters from understanding their total property tax burden under both current and annexation scenarios.
- Creates an incomplete picture that could sway voter decisions based on narrow data.

3. Advocacy Over Neutral Education
The materials appear designed to promote annexation rather than neutrally educate voters:

- The City contracted LLPA for $64,000 specifically for "strategic communication consulting services," which included crafting messaging about annexation. LLPA has a documented history of advocacy work for ballot measures.
- The calculator's framing emphasizes annexation as a solution without presenting alternative options (e.g., renegotiating the existing fire service contract).
- A formal complaint alleges that public funds were improperly used for advocacy rather

than neutral voter education.

4. Potential Violation of RCW 42.17A

Under RCW 42.17A.555, public agencies are prohibited from using public resources for election-related advocacy. The following elements suggest potential violations:

- The use of ambiguous language ("contribution") and selective data presentation aligns with advocacy efforts rather than neutral education.
- LLPA's involvement raises concerns about whether public funds were used to promote annexation during the April 22 special election.

Requested Actions

We respectfully request that the PDC:

1. Investigate whether the City of Edmonds and LLPA intentionally used misleading language in the cost calculator to influence voter perceptions.
2. Review whether omitting complete tax consequences with a yes or no vote accurately informs citizens or seeks to influence a specific outcome.
3. Examine whether public funds were improperly allocated toward advocacy for annexation in violation of RCW 42.17A.
4. Require corrective actions, including revising misleading materials and ensuring future communications comply with transparency standards.
5. Issue formal guidance to ensure municipalities clearly differentiate between neutral voter education and advocacy in future ballot measure communications.

Attachments:

1. Copy of the Edmonds Fire/EMS Cost Calculator document