



CITY OF EDMONDS

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OFFICE OF THE MAYOR

MIKE ROSEN

MAYOR

October 14, 2025

Alice Firman
Compliance Manager
Public Disclosure Commission
VIA EMAIL to pdcc@pdcc.wa.gov

RE: PDC Case Number 179717 – Lee Reeves

Dear Ms. Firman:

We are in receipt of the PDC's October 8, 2025 email, regarding the complaint filed by Lee Reeves. The City of Edmonds agrees with your attached October 7, 2025 explanation of the law to Mr. Reeves, specifically, that RCW 42.17A.555 only governs the use of public facilities or resources for the purpose of supporting or opposing a candidate or ballot measure when there is actually a ballot measure pending. Mr. Reeves' initial allegations pointed exclusively to documents or actions that occurred prior to July 8, 2025, when the city council voted to put a levy lid lift on the ballot for consideration by the voters. As a matter of law, those pre-July 8th documents and actions cannot form the basis of a violation of RCW 42.17A.555.

On October 7, 2025, you informed Mr. Reeves about the information missing from his complaint and asked him to provide additional evidence to support his allegation by October 10, 2025. You further informed him that if he did not do so, his complaint would be "closed." From this communication and our own understanding of the law, we conclude that Mr. Reeves' initial complaint was frivolous and that we need not respond to the substance of his arguments with regard to any pre-July 8th documents and actions. In the interest of efficiency, we will not comment further on the various attachments to his initial complaint.

In response to your request for post-July 8th evidence, Mr. Reeves cites only¹ the following:

- The city's web page that explains the levy lid lift:
 - https://www.edmondswa.gov/government/budget_property_tax_levy
- The September 12, 2025 entry of the City Chat column:
 - https://www.edmondswa.gov/government/communications/city_of_edmonds_blog/budget_property_tax_updates_9_12
- The town halls that have been held by the city on the subject of the budget and levy on September 25, 2025, October 9, 2025, and which will be held on October 25, 2025

¹ Despite your having made it quite clear that documents and actions before July 8, 2025 could not support his complaint, he still submitted additional pre-July 8th documents with his supplementation. We will not respond substantively to the content of these documents because they are so patently frivolous.

- One particular entry on the City of Edmonds Community and Government Facebook page that references a town hall event:
 - <https://www.facebook.com/cityofedmonds/photos/edmonds-town-halls-more-than-40-community-members-came-out-this-week-to-learn-ab/1208910794600752>
- And one article from a local online newspaper called My Edmonds News that talks about the three town halls:
 - <https://myedmondsnews.com/2025/09/city-hosts-first-of-three-town-halls-on-edmonds-levy-lid-lift-proposal/>
- Mayor Rosen's September 30, 2025 mid-biennial budget modification address:
 - <https://www.youtube.com/watch?v=oFS90cEG-D4>
- Mayor's web page regarding the mid-biennial budget modification address:
 - https://www.edmondswa.gov/news/what_s_new/Mayor_s_Budget_Address
- Mayor's main web page which contains various references to the budget:
 - https://www.edmondswa.gov/government/departments/mayors_office

The City of Edmonds is blessed with an engaged citizenry. City leaders have a long history of using town halls to engage with their constituents on the important topics of the moment. In other words, town halls are “part of the normal and regular conduct of the office or agency,” and are therefore within the exemption provided by RCW 42.17A.555(3). Since My Edmonds News often publicizes such town halls and has an easily searchable database of past articles, we have linked, below, stories about past town halls that were conducted when there was no ballot measure pending:

- <https://myedmondsnews.com/2024/04/from-housing-to-fire-services-edmonds-city-council-tackles-questions-in-thursday-town-hall/>
- <https://myedmondsnews.com/2023/05/councilmembers-hear-about-traffic-crime-and-parks-during-monday-town-hall/>
- <https://myedmondsnews.com/2022/09/councilmember-diane-buckshnis-hosting-town-hall-meetings-in-october/>
- <https://myedmondsnews.com/2021/09/councilmember-olson-hosting-town-halls-on-budget-priorities/>
- <https://myedmondsnews.com/2021/07/mayor-issues-call-for-community-efforts-against-hate-in-first-post-pandemic-town-hall/>
- <https://myedmondsnews.com/2020/10/addressing-topics-from-the-city-budget-to-bike-lanes-mayor-hosts-five-corners-chase-lake-town-hall/>
- <https://myedmondsnews.com/2020/05/answering-citizen-questions-in-2nd-virtual-town-hall-mayor-says-city-is-definitely-closing-main-street-for-pilot-no-vehicle-project/>
- <https://myedmondsnews.com/2020/04/edmonds-mayor-to-host-virtual-town-hall-tuesday-afternoon/>
- <https://myedmondsnews.com/2018/10/council-president-mike-nelson-hosting-2nd-housing-town-hall-oct-15/>
- <https://myedmondsnews.com/2018/09/edmonds-city-council-president-mike-nelson-announces-his-own-town-halls-on-housing/>
- <https://myedmondsnews.com/2018/09/draft-housing-strategy-dominates-during-mayors-town-hall-meeting/>
- <https://myedmondsnews.com/2017/11/mayor-bringstown-hall-edmonds-library/>

The above examples should indicate that the City of Edmonds has been using town halls for many years, across at least three different mayoral administrations, as a way of communicating with constituents about the important issues of the day. Contrary to what Mr. Reeves may argue, town halls are not a campaign tool. They allow city leaders to engage with their constituents. The town halls that Mr. Reeves complains about are part of the normal and regular conduct of the city. As such, they are exempt from

RCW 42.17A.555. Furthermore, Mr. Reeves does not point to any statement made at a town hall that wasn't factual, fair and objective.

In addition to the above town halls, the city has also convened several town hall style meetings on the city's comprehensive plan periodic update, evidence of which can be found here: <https://www.edmondswa.gov/cms/one.aspx?pageid=20153021&portalid=16495016> and https://www.edmondswa.gov/government/departments/development_services/planning_division/2025_code_updates/community_outreach

Mr. Reeves also cites certain budget-related websites and the mayor's address regarding the mid-biennial budget modification. These also represent normal and regular conduct of the city. In 2024, the City of Edmonds adopted a budget for the 2025-2026 biennium. One normal and regular part of running a biennial budget is the proposal and adoption of a mid-biennium modification.

The legislative authority of a city having adopted the provisions of this chapter shall provide by ordinance for a mid-biennial review and modification of the biennial budget. The ordinance shall provide that such review and modification shall occur no sooner than eight months after the start nor later than conclusion of the first year of the fiscal biennium. The chief administrative officer shall prepare the proposed budget modification and shall provide for publication of notice of hearings consistent with publication of notices for adoption of other city ordinances. City ordinances providing for a mid-biennium review and modification shall establish procedures for distribution of the proposed modification to members of the city legislative authority, procedures for making copies available to the public, and shall provide for public hearings on the proposed budget modification. The budget modification shall be by ordinance approved in the same manner as are other ordinances of the city. * * *

RCW 35A.34.130 (emphasis added). The above excerpt from RCW 35A.34.130 demonstrates that the mayor's activity related to the mid-biennial review is required by state law and therefore, necessarily, exempt from RCW 42.17A.555 as normal and regular conduct of the city. That fact doesn't change just because a levy lid lift happens to be pending at the time the city is undertaking the mid-biennium review.

We have reviewed the recording and transcript for the September 30, 2025 mid-biennium budget address and we cannot find any reference to the "slow death" comment that Mr. Reeves attributes to that address.

Contrary to Mr. Reeves allegations, the City has not used public funds to advocate for City of Edmonds Proposition 1, which asks voters whether a levy lid lift should be approved or rejected. The City's funds have only been used to provide fair and objective information about Proposition 1 in hopes of educating the electorate so that the residents of Edmonds can learn more about the proposal. As the PDC's own guidance states, "it is not only the right, but the responsibility of local government to inform the general public of the ... issues facing local agencies." The city has included a calculator on its levy lid lift website that easily allows property owners to calculate how much their taxes would increase if the levy lid lift is approved. See calculator here: https://www.edmondswa.gov/government/budget_property_tax_levy Incidentally, this is one of the websites that Mr. Reeves claims to be providing "only positive outcomes". Because most people don't consider the raising of taxes to be a positive outcome, the inclusion of this calculator shows that the city is being fair and objective.

Complaints to the PDC can be intended to influence the outcome of an election. As Teresa Hutchison mentions in her attached September 22nd email to Lee Reeves ("However, it won't have helped us as far as the levy lid lift as we're only three or so weeks away from the ballots dropping. Boy, I'd love to see a

recall on this devious mayor.”), ballots will be mailed soon and voters of the city deserve to have an election unclouded by what appears to be a well-orchestrated attempt to create confusion among the electorate. We ask that the PDC rule on this issue as soon as possible so voters can make a decision that is not biased by a pending complaint.

The PDC has laws that define the difference between advocacy and education and the City believes that it is in compliance. The City has a duty to provide factual information. We are committed to continuing in that effort with regard to the levy lid lift and other aspects of municipal governance.

Sincerely,

Mike Rosen
Mayor

Attachments: 2025-10-07 Email from PDC to Reeves
2025-10-10 PRA Response re PDC Complaint Ticket 179076 page 5-6

Theresa Hutchison <tfhutch@yahoo.com>

Mon, Sep 22, 2025 at 10:26 AM

To: lee.reeves.3@gmail.com

Cc: Diane T <docsthatrock2022@gmail.com>, Ken Reidy <kenreidy@hotmail.com>, Nick Lopez <nicklopezpnw@gmail.com>, Diane Buckshnis <d.buckshnis@comcast.net>, bkrepick@sbcglobal.net, James Ogonowski <james.m.ogonowski@hotmail.com>

Is it time to file another PDC complaint against Mayor Rosen and the City?

With any luck hopefully the weak PDC may not look so kindly, go as easy, as last time on the mayor.

However, it won't have helped us as far as the levy lid lift as we're only three or so weeks away from the ballots dropping.

Boy, I'd love to see a recall on this devious mayor.

Theresa Hutchison

Sent from my iPhone

Alice Fiman replied

3 days ago (Tue, 7 Oct 2025 at 12:48 PM)



To: lee.reeves.3@gmail.com

Lee Reeves,

Thank you for submitting your complaint regarding City of Edmonds staff. It looks like information is missing in order to investigate your complaint.

Per WAC 390-37-040(2)(b), every complaint must include all, "available documentation and other evidence which the complainant is able to supply that supports allegations made in the complaint. Information about where documents or evidence can be obtained, and any relevant contact information should be included for any items that cannot be supplied with the complaint."

- Your complaint alleges violations of RCW 42.17A.555 involving local government campaign activity.
- However, evidence provided includes actions before July 8, 2025 when the council approved a resolution to place it on the ballot
- Please provide additional evidence to support your allegations.

Respond to this email by October 10, 2025, with the required information requested. If a response is not received by the aforementioned date, this complaint will be closed, and you will need to re-file your complaint.

Thank you,
PDC Staff

