State of Washington
PUBLIC DISCLOSURE COMMISSION
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NOTE: ***On Jan. 1, 2026, RCW 42.17A was recodified to RCW 29B***

February 2, 2026

Delivered electronically to diodato.boucsieguez@gmail.com, cg.edwards53@gmail.com & samlandi619@gmail.com

Subject: PDC Case 179144 regarding Diodato Boucsieguez

Dear Diodato (Dio) Boucsieguez:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Sam Landi (the "Complainant") on September 19, 2025. The complaint alleged that Dio Boucsieguez (the "Respondent") violated RCW 42.17A.235, .240, and .320 by failing to timely and accurately report expenditures and provide full sponsor identification (ID) on political advertising.

Specifically, the complaint alleged the Respondent failed to 1) disclose his candidate filing fee and processing fees paid to eFundraising Connections; 2) fully describe a digital advertising expenditure on a C-4 report; and 3) include "Paid for by" or "Sponsored by" and sponsor address on his candidate website.

Mr. Landi also alleged that sponsor ID was missing from the efundraisingconnections.com web page linked to the candidate's Donate page in violation of RCW 42.17A.320. Sponsor ID is required to be present on a candidate website's home page (or landing page, if different) and it is recommended, but not required, on other web pages. Based on these findings, the allegation that sponsor ID was required on the Donate page or its linked web page is hereby dismissed.

Applicable Laws and Rules

- Candidates are required to register with the PDC by filing a *Candidate Registration* (C-1 report). A candidate that selects the Full Reporting option on their C-1 report is required to disclose contributions and expenditures to the PDC on C-3 reports and C-4 reports pursuant to RCW 42.17A.235 & RCW 42.17A.240. The due dates for these reports are based upon the election cycle, the candidate's election participation, and their financial activity.

- From early June through early November, C-3 reports are due weekly, instead of monthly, for candidates that are participating in the General Election. Furthermore, candidate committees that are participating in an election are subject to an accelerated reporting schedule that includes pre- and post-election C-4 reports, regardless of financial activity.

- A candidate committee may file monthly C-4 reports, due by the 10th day of the following month, for those months during which they are not participating in an election. The committee may delay the filing of these monthly reports until they have either received contributions or made expenditures that exceed $750[1] since the last such report filed. RCW 42.17A.235(3(a) and WAC 390-05-400.

- Pursuant to RCW 42.17A.240(7), a candidate's C-4 report should disclose, but is not limited to, the name and address of each person to whom an expenditure was made in the aggregate amount of more than $200[2] during the period covered by the report, as well as the amount, date, and purpose of each expenditure. Person, as defined, includes a vendor. Expenditure details should include, but are not limited to, the name and address of the vendor or recipient, the dollar amount, the date paid, and a description of the goods or services provided, including the number of items. Per WAC 390-16-037(2), the purpose description for some expenditures, such as advertising, may require additional disclosures. An in-kind contribution is disclosed as an expenditure for purposes of campaign accounting and reporting.

- Political advertising as defined in RCW 42.17A.005(40) includes, but is not limited to, digital communication and other forms of mass communication, which is defined in WAC 390-05-290 to include internet websites.

- Pursuant to RCW 42.17A.320, all written political advertising must include the name and address of the sponsor[3]. Sponsor identification should appear on the first page or fold of the political advertising, be set apart from any other printed matter, and the font size used must be at least the larger of the following: 1) ten percent of the largest type used in the advertisement; or 2) ten-point type.

- WAC 390-18-010 indicates that all political advertising must clearly state that it has been paid for by the sponsor. Additional disclosures may be required, depending on the sponsor and type of advertising used and WAC 390-18-030 contains additional information regarding sponsor identification requirements and exemptions for political advertising, and alternatives for online advertising.

Background and Findings

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[1] Per WAC 390-05-400, this dollar amount increased from $200 to $750 effective April 1, 2023.

[2] Per WAC 390-05-400, this dollar amount increased from $50 to $200 effective April 1, 2023.

[3] For the purposes of political advertising, the "sponsor" is the person who paid for the advertising. If a person acts as an agent or is reimbursed for the payment, the original source of the payment is the sponsor.

- The Respondent was a 2025 candidate for City Council Member for the City of Lynnwood. He registered with the PDC as a candidate on May 13, 2025 and selected the Full Reporting option on his C-1 report (Candidate Registration). He appeared on the 2025 Primary Election ballot, participated in the 2025 General Election, and was not elected to the position sought.

- When the complaint was filed, "Paid for by" or "Sponsored by" and the sponsor's address were missing from the Respondent's candidate website located at www.electdio.com.

- The Respondent's Treasurer provided a written response by email on September 26, 2025 and said the following:

    - The Respondent's May C-4 report had been amended to disclose the candidate filing fee, which was an in-kind contribution the candidate made to his campaign.

    - The $550 expenditure made to Northwest Publishing Inc. on 7/5/25 was for a newspaper advertisement, not digital advertising. The campaign corrected this error on their report. The Treasurer indicated that the campaign's digital advertising was a smaller, non-itemized expenditure that had been disclosed on a different C-4 report.

    - The processing fees paid to to eFundraising Connections were disclosed but were not itemized on reports due to the small dollar amounts involved.

    - The candidate's website had been updated to include full sponsor ID.

- On September 26, 2025, the campaign amended the following reports:

    - An in-kind contribution of $198, paid by the candidate to the Snohomish County Auditor's office on 5/9/25 for the filing fee, was disclosed on the May 2025 C-4 report; and

    - The 21-day pre-Primary C-4 report (covering 6/1/25-7/14/25) was corrected to 1) show that the expenditure made to Northwest Publishing Inc.[4] on 7/5/25 was for newspaper advertising; and 2) include the ad's run dates (7/10/25-7/23/25).

- The candidate's website was updated on or about September 26, 2025 to include "Paid for by Dio for City Council" followed by the campaign's address as the sponsor.

- On November 3, 2025, the campaign's Treasurer emailed PDC staff the missing address for the Snohomish County Auditor's office, which is 3000 Rockefeller Ave 1st Floor Everett, WA 98201, but subsequently failed to disclose it on the May C-4 report.

[4] At the request of PDC staff, this expenditure was later amended to include the Northwest Publishing's DBA (doing business as) name, which is "Lynnwood Times."

- Longstanding PDC guidance states that vendor address is needed for an in-kind contribution, which is disclosed like an expenditure for purposes of campaign accounting and reporting, to be in full compliance.

- The Respondent does not have previous warnings/violations of PDC requirements.

Reporting (2025)

The timeliness of the reports filed by the Respondent for election year 2025 is summarized below:

- All seven original monthly and pre- and post-election C-4 reports were timely filed.

- One C-3 report for a deposit dated 7/11/25 was filed 6 days late and before the Primary Election.

- Twenty-five C-3 reports were filed timely.

Incomplete Reports (2025)

- The complaint alleged that the Respondent failed to report a 5/9/25 expenditure for his candidate filing fee on a monthly C-4 report. As indicated above, this expenditure took the form of an in-kind contribution and was reported on 9/26/25, 108 days late and after the 2025 Primary Election.

- Although it was not alleged, a review of the Respondent's reports revealed that the campaign amended their 7-day pre-General C-4 report (covering 10/14/25-10/27/25) on 12/9/25 to disclose $1,952.53 paid to US Postal Service on 10/27/25 for postage costs, permits and stamps. This expenditure was disclosed 42 days late and after the General Election.

Missing Expenditure Details (2025)

- The complaint alleged that the Respondent failed to fully describe a 7/5/25 digital advertising expenditure on a pre-Primary C-4 report. As indicated above, this expenditure was corrected on 9/26/25, after the 2025 Primary Election.

Summary and Resolution

Both mitigating and aggravating factors are present in this case. Non-compliance appears to be the result of good-faith omissions or errors. The relatively small size and modest expenditures of the campaign are also mitigating. However, your late-reported candidate filing fee and postal-related expenditures deprived the public of information during time-sensitive periods in the elections, which is an aggravating factor, as is your campaign's failure to disclose vendor address for an in-kind contribution/expenditure.

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purpose of this chapter. Under WAC 390-37-060, the executive director, at any time prior to

consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but does not amount to a violation that warrants further investigation.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to 1) provide complete sponsor ID on political advertising; and 2) timely and accurately disclose contributions and expenditures in election year 2025. In the future, PDC staff expect you to provide complete sponsor ID and timely and accurately disclose all contributions and expenditures on required reports, including expenditure details. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff is also reminding you about the importance of disclosing complete description details, including vendor name & address, for in-kind contributions on PDC reports in the future in accordance with the PDC laws, rules or guidance.

Based on this information, the PDC has dismissed this matter in accordance with RCW 29B.60.020(1).

If you have questions, you may contact Tabatha Blacksmith at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed by Tabatha Blacksmith
Tabatha Blacksmith
Compliance Officer

Endorsed by,

Electronically signed by Peter Frey Lavallee
Peter Frey Lavallee
Executive Director

cc: Sam Landi