



**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 • Website: www.pdcca.wa.gov

Memorandum

To: Public Disclosure Commission

From: Carolyn Jones, Compliance Coordinator

Date: June 15, 2026

Subject: Kyle Strengholt Enforcement Hearing Memorandum: PDC Case 191596

Allegations:

PDC staff alleges that Kyle Strengholt (Respondent), City Council Member for City of Lynden, violated RCW 29B.55.010 by failing to file a Personal Financial Affairs Statement (F-1), due no later than April 15, 2026.

Background and Prior Violations:

- Kyle Strentholt most recently was elected as a City Council Member for the City of Lynden.
- Between February 20, 2026, and April 20, 2026, PDC staff sent email reminders to all officials regarding their missing F-1 report for calendar year 2025.
- On June 10, 2026, PDC staff emailed Respondent a hearing notice regarding the missing reports for calendar year 2025. This hearing notice was sent to Respondent's email of record, **(Exhibit 1)**
- As of June 15, 2026, Respondent has not filed their F-1 report for election year 2025.

First Violation (PDC Case 173064): (Exhibit 2)

- Respondent, a candidate for City Council Member for the City of Lynden failed to file their required Candidate Registration (C-1) and annual F-1 covering election year 2025. The reports were due no later than May 23, 2025.

- At a June 24, 2025, Brief Adjudicative Proceeding (Brief Enforcement Hearing), Respondent was found in violation of RCW 42.17A.205 (recodified as RCW 29B. 25.020 and RCW 42.17A.700 (recodified as RCW 29B.55.010 01/01/2026) and assessed a civil penalty of \$500 with \$200 suspended, provided the conditions of the order were met and there were no further violations for four years.
- To date, Respondent has not paid the outstanding \$500 civil penalty for case 173064.
- Additionally, the missing C-1 and F-1 reports for calendar year 2025 have not been filed.

Staff Recommendation:

Staff recommends the Commission find that the Respondent violated RCW 29B. 55.010 by failing to file timely an F-1 report for calendar year 2025, and:

1. Assess Respondent a civil penalty between \$0 and \$3,000 as established in WAC 390-37-182 for a respondent on their second violation (first violation heard at full) who did not file the report in question before the hearing.
2. Require Respondent to file the missing the F-1 from calendar year 2025 and pay the penalty within 30 days of the date of the Order.

Attachments:

- **Exhibit 1:** 191596 Kyle Strengtholt Hearing Notice
- **Exhibit 2:** 173064 Kyle Strengtholt Candidate BAP Order (GE25)

PDC Exhibit 1



**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 • Website: www.pdcca.wa.gov

June 10, 2026

Delivered electronically to strenghtk@lyndenwa.org

Subject: F-1 Enforcement Hearing Notice; PDC Case Number 191596

Dear Kyle Strenght:

The Public Disclosure Commission (PDC) has not received your Personal Financial Affairs Statement (F-1 report) disclosing financial activities for calendar year 2025. RCW 29B.55.010 requires every elected or appointed official to file an F-1 report, which was to have been filed no later than April 15, 2026.

Pursuant to RCW 29B.55.010, as an elected or appointed official during all or part of 2025, you are required to file the *Personal Financial Affairs Statement* (F-1 report) covering the calendar year 2025. As of now, the PDC has not received your F-1 report disclosing financial activities for calendar year 2025. RCW 29B.55.010 requires every elected or appointed official to file an F-1 report, which was to have been filed no later than April 15, 2026.

In accordance with RCW 29B.55.010 and RCW 29B.60.020, an Adjudicative Proceeding (Enforcement Hearing) has been scheduled to determine if you violated RCW 29B.55.010 as an elected or appointed official by failing to file the F-1 report covering calendar year 2026. Under the Enforcement Hearing rules, the Commission has the authority to assess a civil penalty in accordance with WAC 390-37-182, the Enforcement Hearing penalty schedule adopted by the Commission (see enclosed copy).

HEARING INFORMATION

Date and time:	Thursday, June 25, 2026, at 10:00 AM
Place:	711 Capitol Way S., Suite 206, Olympia, WA 98504 Also via Teams, Live Audio and Online Transmission
Presiding Officer:	J. Leach, Chair, Public Disclosure Commission
Authority:	RCW 29B and WAC 390

PARTICIPATING VIA MICROSOFT TEAMS

The Enforcement Hearing will be audio and video recorded. The Commissioners and PDC staff will join the meeting in-person or remotely via Microsoft Teams videoconferencing platform.

Anyone wishing to participate in the hearing remotely must follow the instructions below and join the meeting on a computer or mobile app **promptly at 9:45 AM on June 25, 2026**. Please remain in the meeting until the Presiding Officer calls your name and case number. After your case has been heard, you may leave or stay in the meeting.

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

Join on your computer or mobile app:

<https://tinyurl.com/2w28w7bb>

If you are unable to use Teams, or experience technical difficulties, please call the PDC's main number 1-360-753-1111 to obtain information regarding alternate participation by telephone.

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 than **June 19, 2026** 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 pdcc@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 Enforcement Hearing, you may provide a written response describing the facts of your case for consideration by the Commission, including any circumstances or mitigating factors you would like considered. Please submit your written response so it is received by no later than **June 22, 2026**.

SUBMITTING F-1 REPORTS

You are strongly encouraged to complete and submit the required report online prior to the Enforcement Hearing so it is received by the PDC no later than **June 22, 2026**.

The reports must be submitted electronically. Instructions for filing the F-1 can be found here. <https://www.pdc.wa.gov/registration-reporting/personal-financial-affairs-disclosure/completing-f-1>.

If you have any questions about the hearing process prior to the hearing date, please contact PDC Staff by email at pdcc@pdc.wa.gov – and be sure to reference your case number in the subject line of the email.

Sincerely,

PDC Staff
Compliance and Enforcement Division



Enclosures *PDC Penalty Schedule

Penalty Schedule [[WAC 390-37-182](#)]:

Penalty factors (full adjudicatory proceedings).

(1) In assessing a penalty after a full adjudicatory proceeding, the commission considers the purposes of chapter [Title 29B](#) RCW, including the public's right to know of the financing of political campaigns, lobbying and the financial affairs of elected officials and candidates as declared in the policy of RCW [29B.05.010](#); and, promoting compliance with the law. The commission also considers and applies RCW [29B.60.020](#) and may consider any of the additional factors described in subsection (3) of this section.

(2) Under RCW [29B.60.020](#), the commission:

(a) May waive a penalty for a first-time violation;

(b) Must assess a penalty for a second violation by the same person or individual, regardless if the person or individual committed the violation for a different political committee;

(c) Must assess successively increased penalties for succeeding violations pursuant to the following schedule:

Violations:			
Respondent failed to file or timely file an accurate or complete: (1) Statement of Financial Affairs (F-1 Report) / (2) Candidate Registration / (C-1 Report) / (3) Lobbyist Monthly Expense Report (L-2 Report) / (4) Lobbyist Employer Annual Report (L-3 Report) and (5) Local Treasurer's Annual Report (T-1 Report).			
	1st Occasion	2nd Occasion	3rd Occasion
Filed missing report after being notified about the complaint.	\$0 - \$1,000	\$1,000 - \$2,500	\$2,500 - \$5,000
Report is filed late and is incomplete or inaccurate.	\$0 - \$2,000	\$2,000 - \$5,000	\$5,000 - \$7,500
Failed to file missing report by date of enforcement hearing.	\$0 - \$3,000	\$3,000 - \$7,500	\$7,500 - \$10,000

[Excerpt above]

(3) In addition to the requirements of RCW [29B.60.020](#), the commission may consider the nature of the violation and any relevant circumstances, including the following factors:

(a) The respondent's compliance history, 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;

(b) 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;

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

(d) Amount of financial activity by the respondent during the statement period or election cycle;

(e) Whether the noncompliance resulted from a knowing or intentional effort to conceal, deceive or mislead, or violate the law or rule, or from collusive behavior;

(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) Whether the respondent or any person, including an entity or organization, benefited politically or economically from the noncompliance;

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

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

(j) PDC staff or equipment error, including technical problems at the PDC preventing or delaying electronic filing;

(k) The respondent's demonstrated good-faith uncertainty concerning staff guidance or instructions;

(l) Corrective action or other remedial measures initiated by respondent prior to enforcement action, or promptly taken when noncompliance brought to respondent's attention (e.g., filing missing reports, amending incomplete or inaccurate reports, returning prohibited or overlimit contributions);

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

(n) 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;

(o) Penalties imposed in factually similar cases; and

(p) Other factors relevant to a particular case.

(4) The commission may consider the factors in subsections (1) through (3) of this section in determining whether to suspend a portion or all of a penalty upon identified conditions, and whether to accept, reject, or modify a stipulated penalty amount recommended by the parties.

(5) Notwithstanding the above schedule, the commission may assess a penalty of up to ten thousand dollars per violation, or a greater amount if agreed to by the parties, pursuant to RCW [29B.60.020](#), based on the aggravating factors set forth in subsections (1) through (3) of this section.

(6) The penalty schedule for brief enforcement proceedings is provided under WAC [390-37-143](#).

[Statutory Authority: RCW [29B.20.030](#)(1), 2019 c 428, and 2019 c 261. WSR 20-02-062, § 390-37-182, filed 12/24/19, effective 1/24/20. Statutory Authority: RCW [29B.20.030](#)(1) and 2018 c 304. WSR 18-24-074, § 390-37-182, filed 11/30/18, effective 12/31/18. Statutory Authority: RCW [29B.20.030](#)(1). WSR 16-01-015, § 390-37-182, filed 12/4/15, effective 1/4/16. Statutory Authority: RCW [29B.20.030](#), [29B.60.020](#), WSR 13-05-014, § 390-37-182, filed 2/7/13, effective 3/10/13.]

PDC Exhibit 2



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

July 22, 2025

Delivered electronically to kyle.strengholt@gmail.com; kyle@strengholtconstruction.com.

Subject: PDC Order, Case 173064

Dear Kyle A. Strengholt,

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

At the June 24, 2025, Brief Enforcement hearing, the Presiding Officer assessed a total civil penalty of \$500, of which \$200 is suspended, in accordance with WAC 390-37-143. The \$300 non-suspended penalty is payable within 30 days of the date of this Order, August 21, 2025.

Online Payment Option:

To make an online payment please respond to the email accompanying this order requesting a payment link.

A payment link will be sent to you, in which you will need to provide the following information: (1) Case Number; and (2) Respondent Name.

Processing fees may apply.

To mail a check or money order, make it payable to the "Washington State Treasurer" and be sure to include the PDC Case Number in the memorandum field.

For Regular Mail:

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908

For Overnight Mail or In-Person Delivery:

Public Disclosure Commission
711 Capitol Way S, STE 206
Olympia, WA 98501-1267

It is also ordered that you file the missing C-1 and F-1 Reports within 30 days of this order, August 21, 2025.

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

Sincerely,

Electronically Signed by Jordan Campbell

PDC Staff

Enclosure: Initial Order



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

BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A

PDC Case 173064

Kyle A. Strengholt,

Respondent.

Findings of Fact,
Conclusions of Law, and
Order Imposing Fine.

Pursuant to the brief enforcement hearing (brief adjudicative proceeding) notice sent to Kyle A. Strengholt dated May 28, 2025, a brief adjudicative proceeding was held on June 24, 2025, remotely from Olympia, WA by live audio and online transmission, to consider whether the Respondent violated RCW 42.17A.205 by failing to file or timely file a Candidate Registration (C-1 report) and RCW 42.17A.700 by failing to file or timely file a Personal Financial Affairs Statement (F-1 report), disclosing personal financial information for the preceding twelve months, which were both due to be filed within two weeks of candidacy or no later than May 23, 2025.

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commission Chair J. Leach was the Presiding Officer. Commission staff was represented by Compliance Coordinators Colin Peeples, Jordan Campbell and Shelley Warnock. The Respondent did not participate in the hearing or submit any written material.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. The Respondent is or was a candidate for CITY COUNCIL MEMBER of CITY OF LYNDEN.
2. As a candidate, the Respondent was required to file C-1 and F-1 reports by May 23, 2025.
3. The Respondent did not file the C-1 report by the date of the enforcement hearing.
4. The Respondent did not file the F-1 report by the date of the enforcement hearing.
5. The Respondent has no prior violations.

CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officer concludes as follows:

6. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.
7. The Respondent violated RCW 42.17A.205 by failing to file the C-1 report by May 23, 2025.
8. The Respondent violated RCW 42.17A.700 by failing to file the F-1 report by May 23, 2025.

ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

1. **IT IS HEREBY ORDERED** that the Respondent shall file the missing C-1 & F-1 reports within 30 days of the date of this Order and is assessed a total civil penalty of \$500, in accordance with the candidate C-1 & F-1 penalty schedule set forth in WAC 390-37-143.
2. It is further ordered that that \$200 of the \$500 penalty is suspended on the following conditions:
 - a. The Respondent does not commit any further violations of Chapter 42.17A RCW or Title 390 WAC within four years of the date of this Order. The suspended penalty shall not be assessed based solely upon any remediable violation, minor violation, or error classified by the Commission as appropriate to address by a technical correction.
 - b. The Respondent pays the \$300 non-suspended civil penalty within 30 days of the date of this Order.
 - c. The Respondent files the missing C-1 report within 30 days of the date of this Order.
 - d. The Respondent files the missing F-1 report within 30 days of the date of this Order.
3. It is further ordered that, if the Respondent fails to comply with any of the above conditions:
 - a. The full 500 penalty shall immediately become due without further action by the Commission and PDC Staff is directed to refer the matter to collections and/or commence other legal proceedings as authorized by RCW 42.17A and 390 WAC.
 - b. The missing C-1 report shall be due immediately.
 - c. The missing F-1 report shall be due immediately.
 - d. The order shall be void in the event that candidate files a termination statement by June 30, 2025.

This is an **Initial Order** of the Public Disclosure Commission.

Entered this 22nd of July, 2025.

Public Disclosure Commission

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee
Executive Director

I, Jordan Campbell, certify that I emailed a copy of this order to the Respondent at their address of record on the date stated herein.

Electronically Signed Jordan Campbell

Signed

July 22, 2025

Date

APPEALS OF INITIAL ORDER

REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request by email, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1).
- All requests for review must be submitted electronically to pdcc@pdcc.wa.gov.

REQUESTS FOR REVIEW MUST BE RECEIVED BY THE COMMISSION WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THIS INITIAL ORDER WAS ELECTRONICALLY DISTRIBUTED TO YOU.

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. *See* WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

FURTHER APPEAL RIGHTS – SUPERIOR COURT

If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the FINAL ORDER. *See* WAC 390-37-142(7).

YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542.