City of Seattle

Ethics and Elections Commission

November 7, 2008

Mr. Phil Lloyd, Treasurer
Seattle Parks for All
PO Box 21621
Seattle, WA 98111

Re: Late Filed C-3's

Dear Phil:

The Seattle Parks for All committee (the "Committee") filed three C-3's a day late during the final week before the election. While we frequently waive penalties when committees promptly correct their errors, we usually do not do so in the final week before the election. As a result of the Committee's failure to timely file the C-3's, I am imposing a late filing penalty of $50.

LATE FILED C-3 REPORTS

Under SMC 2.04.250.C, during the eight days up to and including election day, reports are due on the same day that deposits are made. The Committee filed C-3's after the close of business on Friday, October 31 for deposits made on October 30. The identities of 11 donors who contributed $2,775 in total were not timely disclosed.

LATE FILING PENALTY

During the week before the election, late filing penalties increase from $10 a day to $50 a day for each late filed report. (SMC 2.04.330.B.2). In light of the proximity to the election, I am imposing a $50 penalty. (Even though three reports of deposits were filed, I am treating this as the functional equivalent of one violation of the law requiring that those deposits be reported on the day they were made.)

RIGHT TO APPEAL

You may appeal this decision by submitting to this office, by 4:00 p.m., November 21, a written request for appeal, pursuant to Administrative Rule 4.B

ACTION TO TAKE

No later than Friday, November 21, deliver to the Commission at 700 Fifth Avenue, Suite 4010, P.O. Box 94729, Seattle, WA 98124-4729, a $50 check payable to the City of Seattle, or your request for appeal.

700 Fifth Avenue, Suite 4010, PO Box 94729, Seattle, WA 98124-4729
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GCIU 804-M

CONCLUSION

A major purpose of the Seattle Elections Code is to give the public timely access to the campaign finances of each political committee. The Committee's delay in accurate reporting inhibited this purpose and delayed the opportunity for scrutiny, to which the public was entitled. Therefore, I am compelled to impose this penalty.

If you have any questions, or have information that we have not considered in this letter, please call me at 684-8577.

Very truly yours,

Wayne Barnett
Executive Director

cc: Seattle Ethics and Elections Commission