



City of Seattle

Ethics and Elections Commission

December 4, 2019

Heidi Wills
Heidi Wills for Seattle
PO Box 23125
Seattle, WA 98102

Dear Ms. Wills:

On October 21, 2019, the Heidi Wills for Seattle committee (the “Committee”) reported obligations for an event held on October 8, 2019 six days late. Since these obligations went unreported for almost a week so close to the election, I am imposing a \$200 penalty.

FACTS

The Committee held an event at the Hotel Ballard rooftop venue on October 8, 2019. The Committee filed the 21-Day C4 on October 15 reporting that the Hotel Ballard and Stoneburner Restaurant had made an in-kind contribution of \$1,000 – \$500 each for event space and food. Upon learning that James Riggle likely shared a contribution limit with the Hotel Ballard, and that Mr. Riggle had already contributed the maximum to the Committee, the Committee subsequently amended that C4 on October 21, 2019 to replace those in-kind contributions with obligations to Hotel Ballard for \$500 (event space), and to Stoneburner Restaurant for \$1,200 (food).

RELEVANT LAW

The Seattle Elections Code requires that all expenditures, including obligations or debts, be timely reported. The Code authorizes the Commission’s Executive Director to assess penalties up to \$50 per day per report and \$150 per day for reports late-filed in the thirty days before the election. SMC 2.04.250 B., and SMC 2.04.330 B-D.

LATE FILING PENALTIES

Because the report showing the debts to Hotel Ballard and Stoneburner Restaurant were filed late so close to the election, I am imposing a \$200 penalty. While I understand the campaign’s effort to get something reported timely on October 15, what ultimately got reported was so different from what was originally reported that I cannot consider the original report timely filed and subsequently amended.

RIGHT TO APPEAL

You may appeal this decision by submitting to this office, by 4:00 pm. December 18, 2019, a written request for appeal, pursuant to the Commission's Administrative Rule 4.¹

ACTION TO TAKE

No later than December 18, 2019, deliver payment, payable to City of Seattle, to the Seattle Ethics and Elections Commission at 700 Fifth Avenue, Suite 4010, P.O. Box 94729, Seattle, WA 98124-4729, or your request for appeal.

CONCLUSION

A major purpose of the Seattle Elections Code is to give the public timely access to the campaign finances of each political committee. Any delay in reporting inhibits this purpose and prevents the opportunity for scrutiny, to which the public is entitled.

If you have any questions, please call me at 684-8577.

Very truly yours,



Wayne Barnett
Executive Director

Cc: Seattle Ethics and Elections Commission
Peter Lavallee, Public Disclosure Commission

¹ Rule 4 APPEALS

A. Upon the written request of a party aggrieved by the Executive Director's decision to dismiss a complaint, or to impose late-filing penalties under SMC 2.04.330, the action may be reviewed by the Commission.

C. An appeal of late-filing penalties shall be served at the Commission's office no later than 14 days after the date of mailing the decision of which review is sought.

D. A request for review shall state the grounds therefor, and shall be no longer than twelve 8-1/2" x 11" double-spaced pages in length with margins of at least 1" on every side, and no more than 12 characters per inch.