

SENT BY EMAIL ONLY

October 6, 2025

Ry Armstrong Armstrong for All 600 First Ave # 104 Seattle, WA 98104

Re: Bonuses and Voucher Gathering

Dear Ry:

I understand from my staff that you would like to pay \$32,000 in bonuses to people who provided services to your campaign for Mayor. I write to tell you why you will not be receiving Democracy Voucher funds to pay those bonuses. I also write to address the outstanding claim for \$30,000 for "Voucher Gathering" in your contract with Break Blue.

SMC 2.04.634.C sets forth the rules for using voucher proceeds. It says:

Candidates may use democracy voucher proceeds only for campaign costs or debts for the relevant office and election cycle, and may not use such proceeds after a reasonable period (to be set by the Commission) following the election to pay campaign debts. Candidates shall not use democracy voucher proceeds:

- 1. For any cash payments;
- 2. *In violation of any law;*
- 3. To pay the candidate (except to repay or reimburse a loan to the candidate's political committee or campaign in an amount not greater than that provided in RCW 42.17A.445(3) or WAC 390-05-400);
- 4. To pay a member of the candidate's immediate family as defined in Section 4.16.030;
- 5. To pay any entity in which the candidate or an immediate family member holds a ten percent or greater ownership interest;
- 6. To pay any amount over fair market value for any services, goods, facilities, or things of value;
 - 7. To pay any penalty or fine;
 - 8. To pay any inaugural costs; or
 - 9. To pay any office funds costs.

You were not selected as one of the two candidates to participate in the general election collecting just 2,120 votes. In this post-election period, I will not permit you to use voucher proceeds to pay eight \$4,000 bonuses (for a grand total of \$32,000) to

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cc:

people. Those are unreasonable. The law requires the Commission to "manage and prudently conserve" voucher funds, and I take that obligation seriously. See, e.g., SMC 2.04.690.F.

As for the \$30,000 due under your contract for "Voucher Gathering," I cannot square that with the Commission's rule, adopted after the 2021 election cycle, putting strict rules in place around payments for voucher gathering. In 2021, the Commission identified paid voucher gathering as inconsistent with the goals of the voucher program. It adopted Rule 16J ("Regulating the Collection of Democracy Voucher Replacement Forms") to place strict limits on the practice going forward, and I am not confident that your campaign complied with the spirit or the letter of the rule.

I understand that this is not welcome news. If you believe that you should be able to use Voucher proceeds to pay \$30,000 to your consultant for voucher gathering, or to pay \$32,000 in bonuses, you may appeal this determination to the full Ethics and Elections Commission. They are the ultimate decision makers.

Best regards,

Wayne Barnett Executive Director

Wayne Barnett

Seattle Ethics and Elections Commission