



2025 November 25

To the Commissioners of the Seattle Ethics & Elections Commission,

I respectfully appeal the late-filing penalties assessed against our Committee. This is our first offense being claimed. The delays were not due to intentional neglect by the candidate, but resulted from a breakdown in communication between our consultant and treasurer. Because the consultant did not provide the invoice, or a final debt amount, until July, our treasurer had no way to report a figure.

At all times I acted in good faith. The communications lapse was entirely outside my control, yet the penalties have been applied as though the candidate personally withheld information. This treatment is inconsistent with the circumstances and with the Commission's own guidelines.

Under the Seattle Municipal Code, the late-filing penalty for a final report ("C-4 marked 'final'") is \$10 per day for each day the report is late, SMC 2.04.330(B)(1). Given that this was a first-time error caused by third-party mismanagement rather than intentional omission, the full civil penalty is unduly punitive.

I request relief through a full appeal resulting in a reduction, ideally elimination, of the fines. Alternatively, I respectfully request that the Commission adjust or eliminate the bonus penalty reductions rather than attributing intentional noncompliance to the campaign if the issue is of a financial nature. Most important to me is my reputation, which is now under scrutiny and feels timed as retaliatory considering the previous claims made against our campaign were either waived or accepted by Director Barnett.

Under Washington State law, RCW 42.17A governs statewide political committee reporting. RCW 42.17A.750 authorizes civil penalties for late or missing reports, including \$10 per day for each day a required report remains delinquent. The statute explicitly allows consideration of mitigating circumstances, including whether the respondent is a first-time filer and good-faith efforts to comply.

Both the Seattle Code and state statute recognize the possibility of leniency, particularly in a first-time, good-faith case. Applying the maximum penalty here does not align with the law's allowance for mitigation or with equitable treatment of similarly situated candidates like Katie Wilson who received a smaller fine in the Primary election for similar circumstances.

This administrative breakdown also highlights a structural issue in the Democracy Voucher program. Consultants playing a central role in reporting should be subject to clear obligations, training, or certification, and responsibility should not rest solely with candidates when professional agents fail to fulfill their duties. Instead the SEEC could build frameworks to legally hold consultants equally accountable.

In light of these facts, I ask the Commission to recognize this as a non-willful, administrative mistake, deserving of leniency and relief consistent with fairness, proportionality, and the original intent of the Elections Code.

Thank you for your consideration.

Respectfully,
Ry Armstrong, they/them