



City of Seattle

Ethics and Elections Commission

November 19, 2025

SENT BY E-MAIL ONLY

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

Dear Ry:

The Armstrong for All Committee (the “Committee”) failed to timely report a \$30,000 obligation for several months. The debt was not reported until after the election on September 9, 2025, when it was included on the post-Primary C4.

FACTS

Voucher Gathering Payment

The post-Primary C4 filed on September 9, 2025, included a debt of \$30,000 to Break Blue for “Voucher Management Lump Sum” that was not previously reported. The candidate signed the contract on February 8, 2025. Under “Payment for Services,” the contract included the following item:

Voucher Gathering	\$30,000	Per Election
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This debt should have been reported on March 10, 2025, the first C-4 report after the contract was signed.

Ry Armstrong Reimbursements

The 21-Day C4 filed on July 15, 2025 included reimbursements to the candidate totaling \$12,850 for expenditures made in March and May 2025. The expenditures were for software, candidate filing fees and payments to campaign workers and should have been reported on the April 10 and June 10 C4s.

RELEVANT LAW

The Seattle Elections Code requires that all expenditures, including obligations or debts, be timely reported. Seattle Elections Code Administrative Rule 7. D. further provides that “when the estimated value of an obligation at the time it is incurred is \$250 or more, the treasurer shall report the actual value, if known, or a reasonable estimate of the value of the obligation.”

The Code authorizes the Commission's Executive Director to assess penalties of 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

We understand that the Committee failed to report debts when they did not have the funds to cover the debts. Problems with "cash flow" are not a reason not to report an obligation. An obligation occurs at the time the funds are committed. You and your consultant, Break Blue, were obliged to provide this information in a timely manner so the public would have complete and accurate information about your campaign finances.

Because you spent \$12,850 in the spring which went unreported until July, and because \$30,000 in obligations went unreported during the six months between March and September of this year, and that amount was not reported until a month after the Primary election, I am imposing a penalty of \$1,500. Please note that SMC 2.04.634.C.7. prohibits the use of voucher proceeds to pay any penalty or fine.

RIGHT TO APPEAL

You may appeal this decision by submitting to this office, by 4:00 pm. December 2, 2025, a written request for appeal, pursuant to the Commission's Administrative Rule 4.¹

ACTION TO TAKE

No later than December 2, 2025, 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.

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.

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 contact me at (206) 684-8577.

Very truly yours,

A handwritten signature in cursive script that reads "Wayne Barnett".

Wayne Barnett
Executive Director

cc: Seattle Ethics and Elections Commission
Peter Lavalley, Public Disclosure Commission
Jeanne Legault, Treasurer