



City of Seattle

Ethics and Elections Commission

SENT BY E-MAIL ONLY

August 4, 2025

Jessica Pisane, Treasurer
Wilson for Seattle
P.O. Box 12171
SEATTLE, WA 98102

Dear Ms. Pisane:

The 21-day C-4 filed by Wilson for Seattle (the “Committee”) failed to include more than \$36,000 in expenditures made during the reporting period. The amended report showing the correct expenditures was not filed until 17¹ days later, on August 1, 2025. Because the original 21-day C-4 showed the Committee had significantly more funds on hand than it actually did during the final three weeks before the election, I am imposing a \$500 penalty.

FACTS

The Committee failed to timely report \$33,410.99 in expenditures on the 21-day C-4, that was due July 15, 2025. The 21-day C-4 filed on July 15 and amended on July 17, 2025, showed the Committee had made \$133,344.32 in expenditures at the end of the reporting period. The 7-day C-4 filed on July 29, 2025, showed the Committee had made \$166,755.31 in expenditures at the start of the reporting period. Those two figures should have been the same.

After SEEC staff emailed you on July 30, 2025, you amended the 21-day C-4 to report the missing \$33,410.99 and erroneously added an extra \$65,267.02 in expenditures that had been spent during the 7-day C-4 reporting period. During an audit with SEEC staff on August 1, 2025, the error was discovered, and you amended the report again to show the correct expenditures on the 21-day C-4.

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 a large sum of funds went unreported during the final 21 days before the Primary election, I am imposing a penalty of \$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. August 18, 2025, a written request for appeal, pursuant to the Commission's Administrative Rule 4.¹

ACTION TO TAKE

No later than August 18, 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.

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 (206) 684-8577.

Very truly yours,

Wayne Barnett

Wayne Barnett
Executive Director

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.

Wilson for Seattle

August 4, 2025

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