



City of Seattle

Ethics and Elections Commission

SENT BY E-MAIL ONLY

November 24, 2025

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

Dear Ms. Pisane:

The Wilson for Seattle committee (the "Committee") failed to report more than \$10,000 in expenditures made during the campaign. The expenditures were in-kind contributions from the candidate's parents, put towards the candidate's childcare expenses during the campaign. Because the in-kind contributions were not timely reported, I am imposing a \$250 penalty.

FACTS

KUOW reported in late October that Katie Wilson's parents were helping her with childcare expenses. The report includes this quote from the then candidate: "Before I decided to run for office, my husband and I were just kind of juggling our kid back and forth... We didn't have her in daycare because it's so expensive. But then when I decided to run, we're like, we really need childcare."

On October 28, our office received a complaint stating: "Katie Wilson has received contributions that exceed Seattle's contribution limit under SMC 2.04.260. We request the Seattle Ethics and Elections Commission investigate these contribution limit violations by candidate Katie Wilson and her mother."

PRECEDENT

In 2000, the Federal Election Commission (FEC) issued Advisory Opinion 2000-08 to a requestor who proposed to make anonymous gifts of \$10,000 to candidates to help them exclusively with personal expenses. The request sought a declaration that such gifts would fall outside of campaign finance laws.

The FEC disagreed, writing that "[n]otwithstanding that the use of funds for a particular expense would be a personal use, payment of that expense by any person other than the candidate or the campaign committee shall be a contribution to the candidate, unless the payment would have been made irrespective of the candidacy." *AO 2000-08*, at 2. The FEC contrasted the situation with a candidate whose parents had made "similar annual gifts to him in [the] three years before his candidacy." *Id.*, at 4.

LATE-FILING PENALTIES

In line with this advisory opinion, and in order to avoid creating an avenue for our campaign finance regulations to be easily circumvented, I conclude that the funds from the candidate's parents to help her with childcare expenses incurred because of her candidacy are campaign contributions. I note that the Mayor-elect cooperated with staff in resolving this issue by refunding to her mother the amount by which her and her husband's contributions exceeded the City's contribution limit, and getting her reports in order. Because this was a novel issue—it's the first time it has arisen in a City election campaign—I am imposing a penalty of only \$250. In the future, campaigns can expect stiffer penalties for accepting this kind of support. Please note that SMC 2.04.634.C.7. prohibits the use of voucher proceeds to pay this penalty.

RIGHT TO APPEAL

You may appeal this decision by submitting to this office, by 4:00 pm. December 31, 2025, a written request for appeal, pursuant to the Commission's Administrative Rule 4.¹

ACTION TO TAKE

No later than December 31, 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.

If you have any questions, please call me at (206) 684-8577.

Very truly yours,

Wayne Barnett

Wayne Barnett
Executive Director

cc: Seattle Ethics and Elections Commission
Peter Lavalley, 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.