



City of Seattle

Ethics and Elections Commission

September 23, 2026

SENT VIA EMAIL

Andy Lo, Treasurer
Julie for Seattle D5
PO Box 27113
Seattle, WA 98165

Dear Mr. Lo:

On August 21, 2026, the Julie for Seattle D5 committee (the “Committee”) late-reported six in-kind contributions totaling \$550. Because the in-kinds were reported six months late and since the Committee had been asked about this potential contribution in March and provided inaccurate information to SEEC staff, I am imposing a \$250 penalty.

FACTS

On March 10, 2026, Polly Grow contacted the Committee via email asking if the candidate had incurred “any expenses for setting up her website.” Later that day, Mr. Lo replied:

I was told the website was created on a volunteer basis by someone who is not usually paid for web development, but if any edit work on it is done by someone who is [usually paid], I will make sure it is reported.

On August 21, 2026, the Committee filed six C-4s to report a \$300 in-kind contribution from Michael O’dlee made on February 28, 2026 for “website assistance,” and five \$50 in-kind contributions from March 1 to July 1, 2026 from his spouse, Annabell Lee, for “O’dlee COLLECTIVE - Web hosting.”

On September 23, 2026, at the request of Ms. Grow, the Committee provided documentation showing that as of September 22, 2026, Annabell Lee had paid \$350 for seven months of web hosting services provided by O’dlee Collective.

Because Mr. O’dlee is the sole proprietor of a business that provides website services including setting up and hosting websites, the Committee was required to timely report the fair market value of those services. The Committee was also required to timely report the in-kind contributions made by Ms. Lee.

RELEVANT LAW

The Seattle Elections Code defines a contribution as

“a loan, loan guarantee, gift, deposit, subscription, forgiveness of indebtedness, donation, advance, pledge, payment, transfer of funds between political committees, **or transfer of anything of value, including personal and professional services, for less than full consideration...**” *SMC 2.04.010*.

The Seattle Elections Code requires that all contributions and expenditures, including in-kind contributions, be reported timely. *SMC 2.04.250 B, D*. 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 2.04.330 B-D*.

LATE FILING PENALTIES

The Committee has timely filed most reports, and responded promptly to questions from the SEEC, however, letting these in-kind contributions go for 6 months without being reported, and providing inaccurate information to our office, is not acceptable. Therefore, I am imposing a penalty of \$250.

RIGHT TO APPEAL

You may appeal this decision by submitting to this office, by 4:00 pm. October 7, 2026, a written request for appeal, pursuant to the Commission’s Administrative Rule 4.¹

ACTION TO TAKE

No later than October 7, 2026, 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 call me at (206) 684-8577.

Very truly yours,

Wayne Barnett

Wayne Barnett
Executive Director

cc: Julie Kang, D5 Candidate
Seattle Ethics and Elections Commission
Peter Lavalley, Public Disclosure Commission