

# Certificates of Non-Foreign Influence (CNFI)

## Key Take-aways

- Corporations contributing to a Candidate or Independent Expenditure committee must file CNFI-c with City Clerk and a copy with recipient campaign.
- Corporations making an Independent Expenditure — purchasing advertising in support of or opposition to a candidate — must file the CNFI-ie with the City Clerk.
- Independent Expenditure committees that receive a CNFI-c must file with the relevant C3 or C4, a copy of the CNFI-c provided by the contributor. The CNFI-c filed by the IE committee can be emailed to [ethicsandelections@seattle.gov](mailto:ethicsandelections@seattle.gov) with “CNFI” in the subject line.
- Candidate committees that receive a CNFI-c are required to maintain the CNFI-c with their records.
- The CNFI must be signed by the CEO.
- Foreign-influenced corporations are prohibited from contributing to Seattle candidates.

## Defined terms

### [SMC 2.04.010](#)

"Corporation"  
"Foreign-influenced corporation"  
"Foreign investor"  
"Foreign owner"  
"Independent expenditure"  
"Independent expenditure committee"

## Relevant Law

### [SMC 2.04.260.A.2](#) Each report required under [Section 2.04.250](#) shall disclose: The name and address of each person who has made one or more contributions during the reporting period, together with: ...

d. A copy of the certification provided pursuant to subsection 2.04.270.D, by the chief executive officer of any corporation making a contribution, that the corporation is not a foreign-influenced corporation. [SMC 2.04.270.D](#). Any corporation making an independent expenditure or contributing to an independent expenditure committee shall, **within seven business days** after making such expenditure or contribution, file with the City Clerk a statement of certification signed by its chief executive officer under penalty of perjury, avowing that after due inquiry, the corporation was not a foreign-influenced corporation on the date such expenditure or contribution was made. The corporation shall also provide a copy of the statement of certification to any independent expenditure committee to which it makes a contribution.

[SMC 2.04.370.E.2](#) Any corporation making a contribution to a candidate for Mayor, member of the City Council, or City Attorney of The City of Seattle shall, **within seven business days** after making such contribution, file with the City Clerk a statement of certification signed by its chief executive officer under

penalty of perjury, avowing that after due inquiry, the corporation was not a foreign-influenced corporation on the date such contribution was made. The corporation shall also provide a copy of the statement of certification to any campaign to which it contributes.

### [SMC 2.04.400](#)

- A. No foreign-influenced corporation shall make an independent expenditure in elections for or against candidates for the offices of Mayor, City Council, or City Attorney of The City of Seattle, nor a contribution to an independent expenditure committee that has conveyed, implicitly or explicitly, that contributions to the committee may be used in elections for or against candidates for the offices of Mayor, City Council, or City Attorney of The City of Seattle.
- B. An independent expenditure committee may dedicate any contributions that do not comply with the restrictions of [Section 2.04.400](#) for use in elections outside Seattle or for other lawful purposes.

## FAQs

1. Does a Union have to file the CNFI? No.
2. Does a Non-profit have to file the CNFI? Yes.
3. Does a corporation that contributes to a Ballot Measure Committee have to file the CNFI? No.



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For more information, contact Polly Grow at [polly.grow@seattle.gov](mailto:polly.grow@seattle.gov) or (206) 615-1248