



City of Seattle

Ethics and Elections Commission

November 17, 2017

Abbot Taylor, Treasurer
People for Teresa
PO Box 20655
Seattle, WA 98102

Dear Abbot:

On October 19, 2017, the People for Teresa committee (the “Committee”) amended the 21-day pre-General Election C4 to include more than \$95,000 in obligations that had not been previously reported. Since the report was late-filed during the 21 days before the election, I am imposing a penalty of \$300.

FACTS

On October 17, the Committee timely filed the 21-day pre-General Election C4 showing debts of \$3,471.47, and almost \$153,000 to spend in the remaining three weeks of the campaign. Late on October 18, the treasurer received invoices from the Committee’s consultant, NWP Consulting for obligations incurred on October 16 totaling an additional \$95,389.29. The invoice showed debts to a printer for 80,973 mailers, a mail house for postage and mail prep, and to Comcast for television time.

The Committee filed an amended C4 on October 19 to report the previously unreported obligations to NWP Consulting, reducing its funds remaining in the final three weeks of the campaign to approximately \$57,000.

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 \$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

The Committee filed a complete and accurate C4 due on October 17, 2017, two days late. I am therefore imposing a penalty of \$300.

RIGHT TO APPEAL

You may appeal this decision by submitting to this office, by 4:00 pm. December 1, 2017, a written request for appeal, pursuant to the Commission's Administrative Rule 4.¹

ACTION TO TAKE

No later than December 1, 2017, 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 684-8577.

Very truly yours,



Wayne Barnett
Executive Director

Cc: Seattle Ethics and Elections Commission
Peter Lavallee, 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.