

Seattle Ethics and Elections Commission Regular Meeting

November 5, 2025

The November 5, 2025, Seattle Ethics and Elections Commission (SEEC) Regular Meeting convened in Seattle Municipal Tower Conference Room 4080 and remotely. Chair Zach Pekelis [Chair], Vice-Chair Jonathan Schirmer [Vice-Chair], and Commissioners Kristin Hawes, Kai Smith, and Vivian Vassall participated via Webex. Commissioner Bobby Forch was absent. Five Commissioners present constituted a quorum for the purposes of hearing an appeal. Executive Director Wayne Barnett [Director] and staff members Fedden Amar, Cliff Duggan, Polly Grow, and René LeBeau were present. Staff members Chrissy Courtney and Amanda Francke as well as Assistant City Attorneys Joe Levan and Gary Smith participated via Webex.

The Chair called the meeting to order at 4:01 p.m. The Chair added a third final action item of finalizing the written supplementary opinion in the matter of the Appeal of Executive Director Dismissal of Chapman Complaint. The complaint was adjudicated by voice vote at the October 1, 2025, SEEC Commission Regular Meeting.

Discussion of Written Public Comment (if applicable)

Public Comment was received by the Commission. The Chair elected to address the comment within each of the applicable action items to which it pertains.

Final Action Items

1. Appeal of Determination on Staff Bonuses and Voucher Gathering Payout

The Director explained that Ry Armstrong, Primary Election candidate for Mayor, had a conversation with staff Polly Grow and René LeBeau about closing down their campaign after

the Primary. One of the items discussed was reasonable bonuses as being an option for payment at some point after the election.

The issue next came up when Mx. Armstrong's treasurer provided a draft *Reporting expenditures form* (C-4) to the Voucher Program office. They proposed giving \$4,000 bonuses to eight people for a total of \$32,000. The amount was far more than previously seen in campaign bonuses. The Director determined the amount was unreasonable and informed Mx. Armstrong they could appeal to the Commission.

The second issue was a \$30,000 payment under a contract between the Armstrong for All campaign and Break Blue Strategies [Break Blue] for voucher gathering. The Director recalled the Commission discussions after the 2021 election cycle about paid voucher gathers. The Commission ultimately put tight rules in place to limit the practice.

The Chair clarified the issues for review: two separate payments from the Armstrong for All campaign. The first is eight \$4,000 bonuses to campaign staff for a total of \$32,000. The Director stated the bonuses were for campaign staff and five of the consultant's staff. The Chair continued: And then a separate payment of \$30,000 was to a contractor for voucher gathering.

The Chair asked the Director if the \$32,000 in bonuses from the Democracy Voucher funds were denied because they were above fair market value (FMV). The Director responded yes. Campaigns are allowed to pay FMV for items under the voucher code. They cannot just give money away. The Director said there was no other basis for denying that request.

The Chair asked the basis of denial to the Break Blue request of \$30,000. The Director said that after the campaign ended, the candidate's campaign workers kept collecting vouchers. This is the second time this type of activity has been seen in recent mayoral campaigns. Some

campaigns believe they have \$450,000 to spend. That is not the case. Money is given to candidates to spend on legitimate campaign purposes.

The Chair asked if all of that \$30,000 payment was for post-primary election voucher gathering. The Director responded no, it was for something that the campaign had been incurring. The campaign said it is for management services throughout the campaign. Arguably that should have been reported earlier as a debt. However, the Voucher program did not find out about this issue until late September.

The Chair asked if late reporting would be a basis to reject the payment. The Director did not believe so. Fines may be issued for late reporting, but it is unsure if payment could be denied if something is reported late.

The Chair noted that the Director invoked Elections Code Rule 16.J, which governs Democracy Voucher collection and payments. The Chair recalled that a mayoral campaign may have no more than five paid collectors, that the collectors have to register with the Voucher Program, take a SEEC training course, and sign an attestation form. When asked if Break Blue complied with the regulatory requirements, Ms. LeBeau replied yes.

Commissioner Hawes asked if the Director could recall the amounts of those bonuses that had been approved in the past. The Director mentioned two bonuses in the 2025 election cycle. Nathan Rouse, Primary candidate for City Attorney, paid \$2,200 in the aggregate to three people. Jeannie Chun, Primary candidate for D2, paid \$4,600 to two people in the aggregate.

Commissioner Hawes asked if bonuses had been paid in past election cycles. The Director responded yes. The Commissioner asked if those amounts were commensurate with what candidate Armstrong was requesting. The Director responded that they were of lesser amounts.

Ms. Grow explained that typically bonuses were \$1,000-\$1,500. It might be an extra week of pay or two weeks of pay. A consultant might get a one-month added payment. A consultant might typically charge \$5,000 and then they would get a total of \$5,000. It would not be \$5,000 for multiple employees of the consultant.

Commissioner Hawes asked if everyone at Break Blue qualified to be signature gathers per Rule 16. Ms. LeBeau replied not everyone at the firm was qualified to collect. However, the Armstrong for All campaign never had more than five collectors at a time which complied with the rule.

Commissioner Smith asked the Director if there was a consideration to approve a lower dollar amount. The Director stated he did not want to get into a negotiation with the candidate and so denied the \$32,000. The Commissioner asked if there was a copy of the Break Blue contract that was reviewed and could be made available to the Commissioners. The Director responded that he had a copy of the contract and would send it electronically to the Commissioners.

The Chair asked Mx. Armstrong if they had anything to say in addition to their written submission. They said in terms of the bonuses, there may have been a communication error. The guidance they received from Ms. Grow and Ms. LeBeau was to submit “something,” Mx. Armstrong recalled there were no guidelines on the range of what would be considered reasonable. They come from a nonprofit world where it was thought a bonus would be equal to one month's pay as a thank-you for staff and consultants that worked hard on the campaign to make sure that the campaign ended debt-free. That is where the \$4,000 came from per individual, but they stated that they were never tied to that amount. Mx. Armstrong said they are very open to whatever amount the Commissioners and the Director are open to giving.

When asked why the campaign was gathering so much after the primary, it was because money spent on ads right up to the election trying to make as much impact as possible. They said the campaign wasn't sure of the Program runs and continued to collect because at times disbursements were received weeks later or updates would be received in the terms of the campaign. The bonuses seemed approvable from Ms. Grow and Ms. LeBeau, so an option was drafted.

In terms of the voucher gathering payment, Mx. Armstrong sees it as reasonable. It is just the timing of that compensation is different in the contract than other campaigns. The intention behind the \$30,000 was to have it be payable at the end of the campaign so as not to incur too much debt or did not encumber the campaign too early. Their intent was to come in good faith trying to pay their people and have the issue resolved.

The Chair asked what else Break Blue did for their campaign. They replied volunteer management, recruitment of a campaign manager, event management, and traditional fundraising. Because they were unable to hire a separate fundraiser, Break Blue ended up filling both the campaign fundraiser and manager roles. Break Blue was paid \$5,000 a month for fundraising. The voucher management process made sure that vouchers were viable. There were issues with a system and a code they had built that submitted improper vouchers that the City helped them fix. Overall, Mx. Armstrong said Break Blue did a well enough job to make sure that they got over the finish line.

The Chair asked if they knew offhand how much was raised from traditional contributions outside the Voucher Program. Mr. Adam Tradii, Break Blue CEO, said it was \$26,000 and a few hundred dollars. Mr. Tradii said they did not ask for large contributions but for qualifying contributions. All of the fundraising efforts were focused on \$10 qualifying contributions.

The Chair verified that the table at the end of their written submission reflects the monthly costs that each of those listed campaigns incurred for each category. The Chair noted that an obvious shortcoming was that it did not disaggregate Democracy Voucher collection from general fundraising.

Mr. Gabe Magic, Break Blue VP of Fundraising, made clarifying comments as the campaign fundraiser. The fundraising and voucher collecting are very similar in their scope about getting revenue for the campaign. Break Blue was able to get better and better signature and voucher collectors towards the end of the campaign. They had an unusual situation of being able to collect a lot more vouchers towards the end.

Mr. Magic said they were always following up on how much was collected and how many of the vouchers counted. He believed that might be why the SEEC flagged them as maybe spending money inappropriately because there was such a big jump towards the end. Mr. Magic noted in the October 6 denial letter from the Director that it said, "I'm not confident that your campaign complied with the spirit of the letter of the rule," and took issue with that. Mr. Magic believes they did everything within the spirit and the letter of the rule. Raising more money at the end also put a huge amount of pressure on the staff. The reason there are all those people in with the bonuses is because all those people were working around the clock to make sure that vouchers were processed correctly, had the Voter IDs in, and were scanned and ready. The big jump at the end just meant much, much more work for everybody involved. That is why the bonuses seemed to be appropriate. Mr. Magic referred again to the Director's response saying that because the campaign did not receive lots of vote, it seemed odd to give bonuses. Mr. Magic said the bonuses were for the work done because there were so many people doing such a huge amount of work right up to the end.

Mr. Tradii added that Break Blue also did other voucher campaigns this year. Mr. Tradii and Mr. Magic have both worked on previous voucher campaigns. Mr. Tradii believes Break Blue has always tried to comply with the letter and spirit of the law to the best of their ability. As to why the \$30,000 charge was reported late, Break Blue is not the treasurer for the campaign. Break Blue did their best to make the campaign treasurer aware of all expenditures, filings, and everything. Mr. Tradii thinks there was just some miscommunication on that; and it was an honest mistake. The contract was signed and dated from the first week of February. There was no intent to hide a large potential expenditure for the campaign.

Commissioner Smith asked if all of the work described in the submission letter was work that was done under the contract titled voucher gathering. In other words, there is no other contract or amendments to that contract. Mr. Tradii said the Commission had the complete contract.

The Chair asked if Mx. Armstrong had any other questions. They replied no.

The Chair preferred to have more concrete written information including the actual filings before the Commissioners adjudicates the issue.

The Vice-Chair and Commissioner Vassall agreed that they would like to have additional time to read over and appreciate the presentations received today. The Chair inquired about the campaign's filings. The Director and Ms. Grow agreed to send those to the Commissioners as well. Commissioner Hawes requested a summary of past bonuses that were approved, at least recent bonuses from this cycle and perhaps a couple other cycles so the Commissioners could gauge what had been done previously.

The Chair believes the Director has the authority to gather and request any pertinent information from the campaign that would be beneficial to the Director's decision and the

Commission's review. The Chair stated that the Director is free in that period to modify or amend as appropriate the initial decision.

Mx. Armstrong asked if the campaign needed to officially request another extension to keep the campaign open. The Director responded that the Armstrong for All campaign will not be penalized for keeping the campaign open while its appeal is pending

2. Adoption of October 1, 2025, SEEC Regular Meeting minutes

The Vice-Chair made the motion to approve the October 1 minutes, and it was duly seconded. The October 1, 2025, SEEC Regular Meeting minutes were approved by five ayes.

3. Appeal of Executive Director Dismissal of Chapman Complaint

The Chair stated that a written supplementary opinion was edited and in final form. The Commissioners agreed to give the Chair the authority to sign the opinion on behalf of the full Commission.

Commission Hawes made the motion to accept the Appeal of Executive Director Dismissal of Chapman Complaint opinion as final, and it was duly seconded. Commissioner Smith is recused in this matter as announced at the October 1 Commission meeting and remains in effect. The final opinion motion passed by four ayes.

Discussion Items

1. Elections Code Rule 17 Revised Contribution Limits

The Director introduced revised Elections Code Rule 17 and Elections Code Rule 18. These rules make changes to the contribution limits to account for the Consumer Price Index (CPI-W). The first part of Rule 17 (17.A. New Contribution Limit under SMC 2.04.370) has an adjusted amount of \$684.55 which is proposed to round up to \$700.

The second part of Rule 17 (17.B. Contribution Limits Applicable to Democracy Voucher Participants) does not change. The 2025 election cycle adjusted amount was \$325 and rounded up to \$350; the 2027 election cycle adjusted amount is \$345 and also rounds up to \$350.

2. Elections Code Rule 18 Special Elections

Elections Code Rule 18 is being revised for the District 5 special election in 2026. Adjustments will be made for what was previously discussed; i.e., two \$50 vouchers (\$100 total), limited to eligible D5 individuals, DVP contribution limit of \$350, etc. These two revised rules will be on the December 3 agenda (with public hearing) for the Commission to adopt.

3. Democracy Voucher Program report

Ms. LeBeau reported that there is an awareness in the public that campaigns are maxing out on Democracy Vouchers. The 2025 election cycle is getting closer to the 2021 voucher user numbers. Voucher use by district shows D4 and D5 to be the lower usage districts for the 2025 election cycle.

November 28 is the last day for the DVP office to receive and process vouchers. Vouchers received after that date will not be redeemed.

4. Executive Director's report

The Director reported that the Commission appointments are now very much in flux. If appointment packets are not confirmed by the December 16 City Council Meeting and Mayor Harrell and/or Council President Nelson are not re-elected, the appointments will be redirected to the new Mayor-elect and the new Councilmembers-elect.

Commissioner Hawes announced she is moving out-of-state at the beginning of next year, probably after the February Commission meeting. The Commissioner shared this now for prompt action regarding 2026 Commission planning.

The Director announced he has recused himself from participating in matters concerning the mayoral election. The Director's spouse was contacted by a fellow City employee after the Primary and asked to help in transition planning if there is a Wilson administration. The spouse has recently become a candidate for a possible position in a Wilson administration. The Director said it is very contingent, but he still disclosed this to the Chair.

The Chair noted that the Director has designated Marc Mayo, SEEC Ethics and Whistleblower Advisor, Trainer and Investigator, to handle mayoral election matters in his stead.

Commissioner Smith noted that with the two vacancies and Commissioner Hawes leaving after the February meeting, there would be only four Commissioners remaining to form a quorum. This will require perfect attendance to take any action. The Commissioner feels that puts new urgency in identifying new Commissioners. The Director stated he would reach out as soon as the 2026 office holders are known.

Hearing no further comments for the good of the order, the November 5, 2025, SEEC Commission Regular Meeting was adjourned at 4:42 p.m.

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