



City of Seattle

Ethics and Elections Commission

BY E-MAIL ONLY

December 19, 2025

Mr. Paul Chapman
Paulchapman43rd@gmail.com

Re: Case No. 25-1106-1

Dear Mr. Chapman:

This matter came before me as the Executive Director's Designee related to your complaint against Mayor Bruce Harrell. The complaint is entitled, "Administrative Work for Private Club." In brief, your complaint alleges Mayor Harrell used City resources for a non-city purpose when he was on the City Council. In support of your complaint, you link to a November 4, 2025, KUOW story that appeared on KUOW's website claiming that Harrell "directed his staff to perform administrative tasks for the [Royal Esquire] club from 2016 to 2018." For the reasons articulated below, I am dismissing your complaint.

Background and Discussion

Bruce Harrell was a member of the Seattle City Council representing District 2 during the period of 2016-2018. He also served as an officer of the Royal Esquire Club, which is a private social club in his council district.

As a threshold matter, I considered whether a statute of limitations applies to your complaint because the allegations, as above described, relate to events that occurred between 2016 and 2018. Although the City's Code of Ethics, Chapter 4.16 SMC, does not include a specific limitations period, courts in this state have applied a statute of limitations in the context of Chapter 42.23 RCW, which is the state law code of ethics for municipal officers.

In that context, courts have applied a two-year statute of limitations based on RCW 4.16.130, which applies to causes of action that do not fall under an alternate statute of limitations period. See, e.g., *Irwin Law Firm, Inc. v. Ferry Cnty.*, No. 38234-6-III, 2023 WL 1158538, at *3 (Wash. Ct. App., January 31, 2023) (unpublished) (including reference to RCW 42.23.050). Although the *Irwin* decision is unpublished, and therefore not precedential, the reasoning in the decision is sound and offers guidance for addressing the situation here in which no limitations period is provided in the City's Code of Ethics for the allegations at issue.

Regarding the application of the limitations period, I also considered whether evidence has been provided in the record that the information at issue upon which the complaint is based was concealed in some manner. I also considered whether the record includes evidence of bad faith by the subject of the complaint related to whether the information upon which the

complaint is based was discoverable. The record does not include evidence of such concealment or bad faith.

Based on what you have submitted, I find that your allegations arise from a right or duty under the City of Seattle's Code of Ethics, Chapter 4.16 SMC, and that the allegations are akin to a statutory right or duty under Chapter 42.23 RCW for which a specific limitations is not stated. Accordingly, I find that the statute of limitations is two years based on RCW 4.16.130, and that your allegations are therefore time-barred.

Decision

Based on the foregoing, I am dismissing your complaint. If you wish to appeal this dismissal to the Ethics and Elections Commission, you have 21 days in which to file your appeal. It must be no more than 12 pages in length. In reviewing the appeal, the Commission shall base its review on whether I had a rational basis for my decision, and shall only reverse or amend my decision to the extent a rational basis is lacking. *Administrative Rule 4*.

Very truly yours,

Marc Mayo

Marc Mayo
Ethics Advisor/Trainer
Seattle Ethics and Elections Commission