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| <b>Respondent Name</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Bruce Harrell, Tim Burgess, Mike Humphries, "Bruce Harrell for Seattle's Future" ("the PAC") chaired by Mike Humphries                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Complainant Name</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Paul Chapman                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Complaint Description</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p><a href="#">Paulchapman43rd</a> reported via the portal<br/>(Wed, 22 Oct 2025 at 7:49 PM)</p> <p>Attached PDF with full complaint, and included text below</p> <p>The following is a formal complaint asserting violation of Seattle and Washington State Election Laws by Mayor and Candidate Bruce Harrell, Deputy Mayor Tim Burgess, and the Political Action Committee "Bruce Harrell for Seattle's Future" ("the PAC") chaired by Mike Humphries.</p> <p>For expediency I have combined complaints of violations of the Seattle and Washington laws into a single complaint.</p> <p>Seattle Municipal Code states that the municipal election process should be protected from even the appearance of undue influence by individuals and groups making large contributions to the election campaigns of candidates for Mayor. The PAC exists to solicit large contributions from individuals to influence the mayoral race. The complaint I am lodging here is that Bruce Harrell, by speaking at the PAC event which was intended to raise money to support the election of himself, violated Washington State and City of Seattle Election laws.</p> <p>Because a reasonable person would conclude that Bruce Harrell's participation in and speeches at a private fundraiser were intended to increase funds raised by the PAC event, the violations asserted herein are that</p> <p>A. Bruce Harrell's participation at the fundraising event violates the <a href="#">Seattle Municipal Code</a> on "Independent expenditure" and <a href="#">Washington Administrative Code</a> on "Consulting with a candidate";</p> <p>B. The PAC's spending on the event itself constitutes an election law violation due to Bruce Harrell's participation;</p> <p>C. Bruce Harrell's participation in and speeches at a private fundraiser for an ostensibly independent political organization constituted in-kind contributions to the PAC;</p> <p>D. Future spending of money raised during and through the participation of Bruce Harrell and Tim Burgess at the event constitutes an in-kind contribution to the Bruce Harrell mayoral campaign;</p> <p>And further, I assert that Deputy Mayor Tim Burgess as a co-sponsor of the PAC is engaging in a conflict of interest that also constitutes a violation of election laws.</p> <p><b>Statements of fact:</b></p> <ol style="list-style-type: none"> <li>Seattle Mayoral Candidate Bruce Harrell spoke at an event on 16 September 2025 for "Bruce Harrell for Seattle's Future", the Political Action Committee supporting hi ("the PAC event").</li> <li>The invite to the event specifically solicited donations to the PAC See <a href="#">Harrell PAC Event Email</a>.</li> <li>The PAC and the PAC event are co-sponsored by Deputy Mayor Tim Burgess.</li> <li>This PAC event was private and by invitation only.</li> <li>The Agenda for the event stated "5:15PM Mayor Harrell address the group regarding accomplishments, progress made, needs, polity priorities, <b>and the campaign</b>" (emphasis added)</li> <li>After Candidate Bruce Harrell spoke at the PAC fundraiser, the PAC raised more than \$800,00. See <a href="#">Bruce Harrell for Seattle's Future - 2025   Washington State Public Disclosure Commission (PDC)</a></li> <li><a href="#">WAC 390-05-210</a> states (emphasis added); <b>(3) Consulting with a candidate.</b> An expenditure made by a person in cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate; or the candidate's authorized committee or agent is a contribution to such candidate. An expenditure is presumed to be made in cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate, or the candidate's authorized committee or agent when; <b>(b) An expenditure is made based on information about the candidate's plans, projects,</b> or needs provided to the expending person by the candidate, or the candidate's</li> </ol> |

authorized committee or agent with a view toward having an expenditure made; **(c) An expenditure is made by,** through, in consultation with, or with the assistance of, **including the fund-raising assistance of,** any person who, during the twelve months preceding the expenditure; is or has been an officer of the candidate's authorized committee; or

8. [Title 2 - ELECTIONS | Municipal Code | Seattle, WA | Municode Library](#) states (emphasis added): "Independent expenditure" means an expenditure on behalf of or opposing any election campaign, when such expenditure; **1.** Is made independently of the candidate, the candidate's political committee or agent, or any ballot proposition committee or its officers or agents; **2.** Is made **without the prior consent, or the collusion or cooperation, of the candidate,** the candidate's agent or political committee, or the ballot proposition committee or its officer or agents; and
9. [Title 2 - ELECTIONS | Municipal Code | Seattle, WA | Municode Library](#) states (emphasis added) : "Knowledge." A person knows or acts knowingly or with knowledge when: **1.** The person is aware of a fact, facts, or circumstances or result described by an offense in this Title 2; or **2.** **The person has information that would lead a reasonable person to believe that facts exists, which facts are described by an ordinance defining the offense, in violation of tie Title 2.**
10. [Title 2 - ELECTIONS | Municipal Code | Seattle, WA | Municode Library](#) states (emphasis added): 2.04.150 – Intent, interpretation, and construction of chapter **A.** It is the public policy of the City; **2. That the people have the right to expect from their elected representatives the utmost of integrity, honest, and fairness in their dealings;** **3.** That the people shall be assured **that the private financial dealing of their public officials, and of candidates for those offices, present no conflict of interest between the public trust and private interest;**
11. [Title 2 - ELECTIONS | Municipal Code | Seattle, WA | Municode Library](#) states (emphasis added): 2.04.350 – Findings of fact-Limitations to be imposed. **A.** The City finds that, in the interest of the public health, safety, and welfare, **the municipal election process and municipal government should be protected from undue influence by individuals and groups making large contributions to the election campaigns of candidates for Mayor,** City Council, and City Attorney. **B.** The City finds that, in the interest of the public health, safety, and welfare, the municipal election process and municipal government **should be protected from even the appearance of undue influence** by individuals or groups contributing to candidates for Mayor, City Council, and City Attorney. **C.** The City therefore finds that limitations on contributions of money, services, and materials by individuals or groups to municipal election campaigns should be imposed by law to protect the public health, safety, and welfare. These limitations, however, should be reasonable, so as not to discourage personal expression.

## Discussion and Arguments

The following are my agreements for a violation:

1. A reasonable person would understand Bruce Harrell's participation that the PAC event to be for the purpose of soliciting contributions to the PAC.
2. Because the event was private and by invitation only, the speech given by the Mayor was also private.
3. By speaking at the PAC event, concerning his "accomplishments, progress made, needs, policy priorities, and the campaign", he was admission colluding with the PAC by providing insider campaign information to the PAC in violations of [WAC 390-05-210](#) and [Seattle Municipal Code Title 2](#).
4. The PAC event itself was thus a violation of [WAC 390-05-210](#) because Bruce Harrell's speech was intended to support the fundraising activities of the PAC, the PAC event itself constituted "An expenditure ... made ... with the assistance of, including the fund-raising assistance of, any person who, during the twelve months preceding the expenditure, is or has been an officer of the candidate's authorized committee".
5. The PAC event itself also violated [Seattle Municipal Code Title 2](#) because the expenditures on the event were not made "independently of the candidate", and were not "made without the prior consent, or the collusion or cooperation, of the candidate", the event itself was not an "independent expenditure".
6. Because Bruce Harrell was colluding with the PAC, all funds raised by the PAC beginning with the date and time the invite was sent to prospective attendees and donors are in violation of [WAC 390-05-210](#) and [Seattle Municipal Code Title 2](#) laws regarding contributions to an independent expenditure committee;
7. Deputy Mayor Tim Burgess, a public official, in his capacity as co-sponsor of the PAC having spoken at the event regarding "current imperatives", was soliciting large contributions to support the continued incumbency of his boss, Mayor Bruce Harrell. He thus created conflict of interest between his private financial dealings (his employment as a member of the mayor's staff) and the public trust that Mr. Burgess's actions as Deputy Mayor would not have the appearance of undue influence due to the sizeable contributions to the PAC.

Because of the brazen and callous disregard to election laws and ethics, I urge the Seattle Ethics and Elections Commission and the Public Disclosure Commission to levy the maximum penalty available under the law to send a clear and unambiguous message to candidates and public officials.

I urge the PDC to levy a fine of \$10,000 *per contribution accepted* in addition to requiring all contributions be returned, and also fine the candidate and officers of the PAC the maximum allowed under the law.

Per [Title 2 - ELECTIONS | Municipal Code | Seattle, WA | Municode Library](#), I urge the Seattle Ethics and Elections Commission to levy the following penalties:

1. all contributions to the PAC starting with the date and time the PAC event email was sent be returned to donors.
2. That because the PAC's activity has been poisoned by the collusion and cooperation of the candidate and the conflict of interest by the deputy mayor, no future contributions be allowed, as they would constitute a de facto contribution to the candidates campaign.
3. A fine equal to two times all contributions be levied.
4. The candidate be held equally responsible for this violation and be fined two times all contributions made to the PAC.
5. The deputy mayor be held liable for a penalty of \$5000 per violation of consulting with the PAC.
6. That, should the candidate win the election due to the PAC spending of contributions made in violation of the [Seattle Municipal Code Title 2.04.500](#), these violations be forwarded to the King County Prosecutor for prosecution for review by the court to determine if the result of the election should be held void and a special election held within 60 days of such finding.

I declare under penalty of perjury of the laws of the state of Washington that the information in this complaint is true and correct.

-Paul Chapman

### **What impact does the alleged violation(s) have on the public?**

Flagrant violation of election laws. Because a reasonable person would conclude that Bruce Harrell's participation in and speeches at a private fundraiser were intended to increase funds raised by the PAC event, the violations asserted herein are that

(A) Bruce Harrell's participation at the fundraising event violates the Seattle Municipal Code on "Independent expenditure" and Washington Administrative Code on "Consulting with a candidate";

(B) The PAC's spending on the event itself constitutes an election law violation due to Bruce Harrell's participation;

(C) Bruce Harrell's participation in and speeches at a private fundraiser for an ostensibly independent political organization constituted in-kind contributions to the PAC;

(D) Future spending of money raised during and through the participation of Bruce Harrell and Tim Burgess at the event constitutes an in-kind contribution to the Bruce Harrell mayoral campaign;

(E) And further, I assert that Deputy Mayor Tim Burgess as a co-sponsor of the PAC is engaging in a conflict of interest that also constitutes a violation of election laws.

### **List of attached evidence or contact information where evidence may be found**

Invite to PAC Event: <https://s3.documentcloud.org/documents/26188215/harrell-pac-event-email.pdf>

Press coverage of the PAC event: <https://www.thestranger.com/news/2025/10/15/80284220/bruce-harrell-spoke-at-a-fundraiser-for-the-pac-supporting-him>

### **List of potential witnesses with contact information to reach them**

### **Certification (Complainant)**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

## Election Ethics Complaint: Bruce Harrell PAC Speech

To:

- Washington Public Disclosure Commission ([Enforcement | Washington State Public Disclosure Commission \(PDC\)](#))
- [EthicsandElections@seattle.gov](mailto:EthicsandElections@seattle.gov)

The following is a formal complaint asserting violation of Seattle and Washington State Election Laws by Mayor and Candidate Bruce Harrell, Deputy Mayor Tim Burgess, and the Political Action Committee “Bruce Harrell for Seattle’s Future” (“the PAC”) chaired by Mike Humphries.

For expediency I have combined complaints of violations of the Seattle and Washington laws into a single complaint.

Seattle Municipal Code states that the municipal election process should be protected from even the appearance of undue influence by individuals and groups making large contributions to the election campaigns of candidates for Mayor. The PAC exists to solicit large contributions from individuals to influence the mayoral race. The complaint I am lodging here is that Bruce Harrell, by speaking at the PAC event which was intended to raise money to support the election of himself, violated Washington State and City of Seattle Election laws.

Because a reasonable person would conclude that Bruce Harrell’s participation in and speeches at a private fundraiser were intended to increase funds raised by the PAC event, the violations asserted herein are that

- A. Bruce Harrell’s participation at the fundraising event violates the [Seattle Municipal Code](#) on “Independent expenditure” and [Washington Administrative Code](#) on “Consulting with a candidate”;
- B. The PAC’s spending on the event itself constitutes an election law violation due to Bruce Harrell’s participation;
- C. Bruce Harrell’s participation in and speeches at a private fundraiser for an ostensibly independent political organization constituted in-kind contributions to the PAC;
- D. Future spending of money raised during and through the participation of Bruce Harrell and Tim Burgess at the event constitutes an in-kind contribution to the Bruce Harrell mayoral campaign;

And further, I assert that Deputy Mayor Tim Burgess as a co-sponsor of the PAC is engaging in a conflict of interest that also constitutes a violation of election laws.

## Statements of fact:

1. Seattle Mayoral Candidate Bruce Harrell spoke at an event on 16 September 2025 for “Bruce Harrell for Seattle’s Future”, the Political Action Committee supporting him (“the PAC event”).
2. The invite to the event specifically solicited donations to the PAC. See [Harrell PAC Event Email](#).
3. The PAC and the PAC event are co-sponsored by Deputy Mayor Tim Burgess.
4. This PAC event was private and by invitation only.
5. The Agenda for the event stated “5:15PM Mayor Harrell addresses the group regarding accomplishments, progress made, needs, policy priorities, **and the campaign**” (emphasis added)
6. After Candidate Bruce Harrell spoke at the PAC fundraiser, the PAC raised more than \$800,000. See [Bruce Harrell for Seattle's Future - 2025 | Washington State Public Disclosure Commission \(PDC\)](#)
7. [WAC 390-05-210](#) states (emphasis added)
  - (3) ***Consulting with a candidate.*** An expenditure made by a person in cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate, or the candidate's authorized committee or agent, is a contribution to such candidate. An expenditure is presumed to be made in cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate, or the candidate's authorized committee or agent, when:
    - (b) **An expenditure is made based on information about the candidate's plans, projects,** or needs provided to the expending person by the candidate, or the candidate's authorized committee or agent, with a view toward having an expenditure made;
    - (c) **An expenditure is made by,** through, in consultation with, or with the assistance of, **including the fund-raising assistance of,** any person who, during the twelve months preceding the expenditure, is or has been an officer of the candidate's authorized committee; or
8. [Title 2 - ELECTIONS | Municipal Code | Seattle, WA | Municode Library](#) states (emphasis added):

"Independent expenditure" means an expenditure on behalf of or opposing any election campaign, when such expenditure:

  1. Is made independently of the candidate, the candidate's political committee or agent, or any ballot proposition committee or its officers or agents;
  2. Is made **without the prior consent, or the collusion or cooperation, of the candidate,** the candidate's agent or political committee, or the ballot proposition committee or its officers or agents; and
9. [Title 2 - ELECTIONS | Municipal Code | Seattle, WA | Municode Library](#) states (emphasis added) :

"Knowledge." A person knows or acts knowingly or with knowledge when:

1. The person is aware of a fact, facts, or circumstances or result described by an offense in this Title 2; or

2. **The person has information that would lead a reasonable person to believe that facts exist, which facts are described by an ordinance defining the offense, in violation of this Title 2.**

10. [Title 2 - ELECTIONS | Municipal Code | Seattle, WA | Municode Library](#) states (emphasis added):

2.04.150 - Intent, interpretation, and construction of chapter

A. It is the public policy of the City:

2. **That the people have the right to expect from their elected representatives the utmost of integrity, honesty, and fairness in their dealings;**

3. That the people shall be assured that **the private financial dealings of their public officials, and of candidates for those offices, present no conflict of interest between the public trust and private interest;**

11. [Title 2 - ELECTIONS | Municipal Code | Seattle, WA | Municode Library](#) states (emphasis added):

2.04.350 - Findings of fact—Limitations to be imposed.

A. The City finds that, in the interest of the public health, safety, and welfare, **the municipal election process and municipal government should be protected from undue influence by individuals and groups making large contributions to the election campaigns of candidates for Mayor,** City Council, and City Attorney.

B. The City finds that, in the interest of the public health, safety, and welfare, the municipal election process and municipal government **should be protected from even the appearance of undue influence** by individuals or groups contributing to candidates for Mayor, City Council, and City Attorney.

C. The City therefore finds that limitations on contributions of money, services, and materials by individuals or groups to municipal election campaigns should be imposed by law to protect the public health, safety, and welfare. These limitations, however, should be reasonable, so as not to discourage personal expression.



# Discussion and Arguments

The following are my arguments for a violation:

1. A reasonable person would understand Bruce Harrell's participation at the PAC event to be for the purpose of soliciting contributions to the PAC.
2. Because the event was private and by invitation only, the speech given by the Mayor was also private.
3. By speaking at the PAC event, concerning his "accomplishments, progress made, needs, policy priorities, and the campaign", he was by admission colluding with the PAC by providing insider campaign information to the PAC in violation of [WAC 390-05-210](#) and [Seattle Municipal Code Title 2](#).
4. The PAC event itself was thus a violation of [WAC 390-05-210](#) because Bruce Harrell's speech was intended to support the fundraising activities of the PAC, the PAC event itself constituted "An expenditure ... made ... with the assistance of, including the fund-raising assistance of, any person who, during the twelve months preceding the expenditure, is or has been an officer of the candidate's authorized committee".
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6. Because Bruce Harrell was colluding with the PAC, all funds raised by the PAC beginning with the date and time the invite was sent to prospective attendees and donors are in violation of [WAC 390-05-210](#) and [Seattle Municipal Code Title 2](#) laws regarding contributions to an independent expenditure committee;
7. Because Bruce Harrell was colluding with the PAC, future expenditures by the PAC will constitute a violation of [WAC 390-05-210](#) as "An expenditure ... made based on information about the candidate's plans, projects, or needs provided to the expending person by the candidate".
5. Because the event itself was made with the prior consent, collusion, and cooperation of the candidate, it does not constitute an "independent expenditure" per Seattle Municipal Code. It is thus a contribution to Bruce Harrell's campaign.
6. Deputy Mayor Tim Burgess, as a public official, is engaging in an on-going conflict of interest by serving as a co-sponsor of the PAC and the PAC event. Mayor Bruce Harrell and Deputy Mayor Tim Burgess are obligated to coordinate daily on managing official city work. This daily interaction itself provides special and insider knowledge of the candidate and the candidate's needs. A reasonable person would assume that this special knowledge cannot be placed behind a "firewall" when Deputy Mayor Burgess engages in PAC strategy.
7. Deputy Mayor Tim Burgess, a public official, in his capacity as co-sponsor of the PAC having spoken at the event regarding "current imperatives", was soliciting large contributions to support the continued incumbency of his boss, Mayor Bruce Harrell. He thus created conflict of interest between his private financial dealings (his employment as a member of the mayor's staff) and the public trust that Mr Burgess's

actions as Deputy Mayor would not have the appearance of undue influence due to the sizeable contributions to the PAC.

Because of the brazen and callous disregard to election laws and ethics, I urge the Seattle Ethics and Elections Commission and the Public Disclosure Commission to levy the maximum penalty available under the law to send a clear and unambiguous message to candidates and public officials.

I urge the PDC to levy a fine of \$10,000 *per contribution accepted* in addition to requiring all contributions be returned, and also fine the candidate and officers of the PAC the maximum allowed under the law.

Per [Title 2 - ELECTIONS | Municipal Code | Seattle, WA | Municode Library](#), I urge the Seattle Ethics and Elections Commission to levy the following penalties:

1. all contributions to the PAC starting with the date and time the PAC event email was sent be returned to donors.
2. That because the PAC's activity has been poisoned by the collusion and cooperation of the candidate and the conflict of interest by the deputy mayor, no future contributions be allowed, as they would constitute a de facto contribution to the candidates campaign.
3. A fine equal to two times all contributions be levied.
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I declare under penalty of perjury of the laws of the State of Washington that the information in this complaint is true and correct.

-Paul Chapman