Respondent Names
Markham McIntyre; Bruce Harrell
Complainant Name
Paul Chapman
Complaint Description

Paul Chapman

(Wed, 29 Oct 2025 at 9:01 PM)

Violations of Washington Election Law and Seattle Ethics and Election Law by Seattle Director Markham McIntyre, and by the Bruce Harrell Reelection Campaign

Per reporting in Publicola based on public records and additional reporting, **Seattle Office of Economic Development director Markham McIntyre**, an appointed Seattle government official, used Seattle city resources to ask Seattle city employees for their personal contact information so that he could put them on a mailing list to solicit support for Mayor Bruce Harrell's campaign. This appears to be a flagrant violation of RCW 42.17A.555 and SMC 4.16.070 prohibiting use of public resources for the purposes of assisting a campaign or for the private benefit of an individual rather than the city.

Additionally, Bruce Harrell's campaign violated Seattle laws and ethics rules for targeting city employees in campaign solicitations. If there were collusion between Mr Harrell and Mr McIntyre, Mr Harrell violated state law as well.

For expediency **I am submitting a combined complaint to both the Washington Public Disclosure Commission and Seattle Ethics and Elections Commission.** I urge the Washington Public Disclosure Commission and Seattle Ethics and Elections Commission to investigate this matter thoroughly, including interviewing all impacted Seattle City Directors and reviewing all email correspondence from Mr McIntyre, Marta Johnson, and the Harrell Campaign on this matter.

I am alleging the following:

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- Per RCW 42.17A.555 Mr McIntyre violated Washington law because as a Seattle City employee he used the facilities of a public office directly for the purpose of assisting a campaign for election of Bruce Harrell to the office of Mayor of Seattle.
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-
-
- Per SMC 4.16.070 - Prohibited conduct Mr McIntyre violated Seattle municipal code and ethics rules because he used his official position for a purpose that is, **or would to a reasonable person appear to be**, *primarily for the private benefit of Mayor Bruce Harrell* rather than primarily for the benefit of the City, and that he used or attempted to use City property for a purpose which is, **or to a reasonable person would appear to be**, for *other than a City purpose*.

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- If Mr McIntyre acted in concert with Mayor Harrell, then Mayor Harrell may also have violated **RCW 42.17A.555** by encouraging the use of any of the facilities of a public office for the purpose of assisting his campaign.
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- The Harrell Campaign violated SMC 2.04.380 through solicitations that specifically targeted City employees and by not limiting other solicitations only to City employees who expressly requested to be added to a mailing list.
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-
- Additionally, Mayor Bruce Harrell violated Seattle Ethics Rules by knowingly and explicitly soliciting contributions from people in Mayor Harrell's chain of command.
-

Facts of the case

On 8/5/2025 at about 8pm initial primary election results were released, showing Mayor Bruce Harrell was trailing challenger Katie Wilson by 1.3%.

On 8/6/2025 at 4:06am (per city documents) Mr McIntyre, sent a message to a City of Seattle Microsoft Teams chat with all City of Seattle department heads, who all report up to Mayor Bruce Harrell. The message was "Hi friends, I'm interested in connecting you y'all outside of work. Can you put your personal cell and email into the chat?" After receiving a number of replies, about an hour later Mr McIntyre replied on the group chat "Thanks! I'll put these into a spreadsheet and share via personal email."

(I'll note here that the timestamp on the Teams chat states 4:06am. Given the flurry of responses, it may be that the timestamp is in GMT rather than local Pacific time, in which case the Teams message would have been sent at 9:06pm on August 5, primary election night.)

On September 8 Mr McIntyre sent an email from his personal address to the personal addresses of city coworkers who had provided their contact information in the Teams group chat. This email stated he was reaching out as part of an effort to support Mayor Harrell's reelection effort, and that if recipients didn't want their contact information shared with the campaign, they should let him know by the next day.

Shortly thereafter, Bruce Harrell Campaign Manager Marta Johnson began sending emails to department heads' personal addresses. The first one thanked them for agreeing to help the campaign of their boss "in the final stretch."

To summarize:

1.
2. Mr McIntyre solicited personal contact information from his coworkers.

3.
4.
5. Mr McIntyre told them he was providing that contact information to the Harrell campaign.
6.
7.
8. Mr McIntyre did provide that contact information to the Harrell campaign.
9.
10.
11. The Harrell campaign knowingly accepted this contact information.
12.
13.
14. The Harrell campaign created a mailing list or added to a mailing list the contact information of known city employees obtained from Mr McIntyre .
15.
16.
17. The Harrell campaign then contacted these city employees.
18.
19.
20. Presumably at least some of the emails from the Harrell campaign included solicitation for contributions.
21.

Violations of Washington Election and Seattle Ethics & Election Laws by Mr McIntyre

1.
2.
3. RCW 42.17A.555 states "No elective official nor any employee of his or her office nor any person appointed to or employed by any public office or agency may use or authorize the use of any of the facilities of a public office or agency, directly or indirectly, for the purpose of assisting a campaign for election of any person to any office". Additionally, the Seattle Ethics Public Employee Rights document" stipulates that "City employees also may not: Use or allow others to use City facilities and equipment, including the following, to assist a candidate or to support or oppose a ballot measure: office equipment, including: phone, cell phone, computer"
4.
5.

a.

b. Mr McIntyre used city equipment to assist a candidate by messaging his coworkers via Microsoft Teams to obtain their personal contact information which he shortly thereafter provided to the Harrell Campaign.

c.

6.
7.

8. The Seattle Ethics Frequently Asked Questions stipulates that "City employees cannot use City resources for campaign purposes".
9.
10.

a.

b. Mr McIntyre used the City's Microsoft Teams account to solicit personal contact information which he then provided in a timely manner to the Harrell campaign.

c.

11.
12.
13. The Seattle Ethics Frequently Asked Questions stipulates that City employees cannot give information to campaign committees unless it is "information that would be provided to any member of the general public who requests it. Information should not be developed for the exclusive use of a campaign."
14.
15.

a.

b. Mr McIntyre developed information (the spreadsheet of non-public and personal contact information) for the exclusive use of the Harrell campaign.

c.

16.
17.
18. The Seattle Ethics Frequently Asked Questions stipulates that City "employees are prohibited by State and City laws from using City resources--including fax and e-mail--for campaign purposes".
19.
20.

a.

b. Mr McIntyre used the City's Microsoft Teams account as part of his effort to assist the Harrell campaign.

c.

21.
22.
23. The Seattle Ethics Public Employee Rights document stipulates that "A city official, candidate or their representative may not ask a city employee to be on a mailing list, if the mailing list will be used to solicit campaign contributions."
24.
25.

a.

b. Mr McIntyre asked his coworkers for their contact information to put them onto a Harrell mailing list where, presumably requests for contributions were made.

c.

26.

27.

28. Finally per SMC 4.16.070 - Prohibited conduct Mr McIntyre violated Seattle municipal code and ethics rules because he used his official position for a purpose that is, or would to a reasonable person appear to be, *primarily for the private benefit of Mayor Bruce Harrell* rather than primarily for the benefit of the City, and that he used or attempted to use City property for a purpose which is, or to a reasonable person would appear to be, for *other than a City purpose*.

29.

30.

Violations of Seattle Municipal Code and Ethics Rules by the Bruce Harrell Campaign

1.

2.

3. The Seattle Ethics Public Employee Rights document states "A Seattle City official, candidate or someone representing a candidate or official may not knowingly solicit campaign contributions from any Seattle City employee". And SMC 2.04.380 states such solicitation is allowed if the "solicitation is part of a general solicitation made to a significant segment of the public that may include, but does not target, City employees" or if "solicitation is made to a City employee who expressly requests to be added to a mailing list from the elected official or candidate for public office, political party, or political committee".

4.

5.

a.

b.

c. The contact information was not given to the Harrell Campaign by express request. Mr McIntyre collected contact information first and *subsequently disclosed* that it would be given to the Harrell Campaign. He also told his coworkers that they must **opt-out** of being added to a Harrell Campaign mailing list rather than **opting-in**.

d.

e.

f.

g.

h. Ms Johnson knowingly added known City employees to her list obtained through Mr McIntyre's ***opt-out*** process.

i.

j.

k.

l. It also appears that at least some of the emails sent to City employees were targeted to them.

m.

n.

o.

p. Additionally, the fact that City employees were ***targeted to be added*** to a Harrell Campaign list without express request, should poison their subsequent inclusion on even a general mass solicitation unless they separately expressly requested to be added.

q.

r.

6.

7.

8. The Seattle Ethics Public Employee Rights document states "A manager or supervisor cannot solicit campaign contributions from anyone in his or her chain of command".

9.

10.

a.

b. Ms Johnson in her capacity as an agent of Mayor Bruce Harrell knowingly and explicitly solicited contributions from people in Mayor Harrell's chain of command.

c.

This discussion leaves open the question of whether Mr McIntyre acted solely on his own accord, or if his actions were taken at the behest of Mayor Bruce Harrell. I urge the PDC and Seattle Ethics and Elections Commission to subpoena both Mr McIntyre and Mr Harrell to obtain their statements under oath with penalty of perjury. If Mr McIntyre acted in concert with Mayor Harrell, then **Mayor Harrell may also have violated RCW 42.17A.555** by encouraging the use of any of the facilities of a public office for the purpose of assisting his campaign.

Relevant Rules and Laws

Seattle Ethics and Elections Commission: Frequently Asked Questions

1. If a City employee wants to run for public office or be active in a campaign, what restrictions apply?

Answer: **City employees cannot use City resources for campaign purposes**. For example, they cannot do campaign work at their City work stations or using City equipment, make campaign calls when they are on City time or in the workplace, place bumper stickers on City cars, display campaign signs or buttons in public work areas, or solicit contributions on City time or premises.

7. Can City employees give out or fax information to campaign committees?

Answer: Yes, employees may give information that is requested by campaigns if it is the employees' normal and regular job activity to do so. **The information that is provided must be information that would be provided to any member of the general public who requests it. Information should not be developed for the exclusive use of a campaign.**

Seattle Ethics and Elections Commission: PublicEmployeeRights.pdf

PROHIBITED ACTIVITY

The City's Elections Code has recently been amended to mirror some state law provisions. City law now provides that:

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- **A Seattle City official, candidate or someone representing a candidate or official may not knowingly solicit campaign contributions from any Seattle City employee.**
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-
- **A manager or supervisor cannot solicit campaign contributions from anyone in his or her chain of command.**
-
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- **A city official, candidate or their representative may not ask a city employee to be on a mailing list, if the mailing list will be used to solicit campaign contributions.**
-
-
- **A city official, candidate or their representative may not target city employees in any mass solicitation of campaign contributions.**
-

City employees also may not:

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- **Use or allow others to use City facilities and equipment**, including the following, to assist a candidate or to support or oppose a ballot measure:
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    -
    -
    - office equipment, including: phone, cell phone, **computer**, photocopier, fax machine, pager; stationery, postage; employees; public office space; property; vehicle; tools; publications of the agency; clientele lists of persons served by the agency.
    -
    -
-
- Do campaign work (volunteer or paid) on City paid time, except vacation and holidays. Be especially alert to conversations that start out as City business and gradually transition into campaigning. When that happens, stop the conversation and continue it when you are not on City time and not using City resources.
-

RCW 42.17A.555: Use of public office or agency facilities in campaigns—Prohibition—Exceptions.

No elective official nor any employee of his or her office nor any person appointed to or employed by any public office or agency may use or authorize the use of any of the facilities of a public office or agency, directly or indirectly, for the purpose of assisting a campaign for election of any person to any office or for the promotion of or opposition to

any ballot proposition. Facilities of a public office or agency include, but are not limited to, use of stationery, postage, machines, and equipment, use of employees of the office or agency during working hours, vehicles, office space, publications of the office or agency, and clientele lists of persons served by the office or agency.

Chapter 4.16 - CODE OF ETHICS | Seattle Municipal Code

4.16.070 - Prohibited conduct

A covered individual may not engage in any of the following acts:

B. Improper use of official position

1. **Use or attempt to use his or her official position for a purpose that is, or would to a reasonable person appear to be, primarily for the private benefit of the covered individual or any other person, rather than primarily for the benefit of the City,** except as permitted by Section 4.16.071;

2. **Use or attempt to use, or permit the use of any City funds, property, or personnel, for a purpose which is, or to a reasonable person would appear to be, for other than a City purpose, except as permitted by Section 4.16.071;** provided, that nothing shall prevent the private use of City property which is available on equal terms to the public generally (such as the use of library books or tennis courts), the use of City property in accordance with municipal policy for the conduct of official City business (such as the use of a City automobile), if in fact the property is used appropriately; or the use of City property for participation of the City or its officials in activities of associations that include other governments or governmental officials;

2.04.380 - Solicitation of contributions by elected officials, candidates or their agents | Seattle Municipal Code

1.
2.
3. No elected official, candidate, or an **official's or candidate's agent may knowingly solicit, directly or indirectly, a contribution to** an office fund created under Section 2.04.180, a **candidate for public office,** a political party, or a political committee **from a City employee** or any member of a City board or commission.
4.
5.
6.
7.
8. This Section 2.04.380 **shall not prohibit an elected official or a candidate from soliciting contributions from City employees if** any of the following conditions apply, and the solicitation does not otherwise violate the provisions of this Chapter 2.04:
9.
10.
    1.
    2. **The solicitation is part of a general solicitation made to a significant segment of the public that may include, but does not target, City employees;**
    3.

4.
5. The solicitation is part of a general solicitation made at a gathering that may include, but does not target, City employees;
6.
7.
8. The solicitation is made to a City employee who, subsequent to July 24, 2009, makes an unsolicited contribution to the elected official or candidate for public office, political party, or political committee making the solicitation;
9.
10.
11. **The solicitation is made to a City employee who expressly requests to be added to a mailing list from the elected official or candidate for public office, political party, or political committee; and**
12.
13.
14.
15. Any other similar circumstance as may be prescribed by rule by the Commission pursuant to Section 3.70.100.
16.
17.

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.
Paul Chapman

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

Mr McIntyre and Mr Harrell misused public resources and public office to benefit a campaign

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

https://publicola.com/2025/10/27/city-official-used-internal-teams-chat-to-solicit-department-directors-contact-info-on-behalf-of-harrell-campaign/

List of potential witnesses with contact information to reach them

All Seattle department heads on the group chat - https://www.seattle.gov/departments

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.

Violations of Washington Election Law and Seattle Ethics and Election Law by Seattle Director Markham McIntyre, and by the Bruce Harrell Reelection Campaign

Per reporting in Publicola based on public records and additional reporting, **Seattle Office of Economic Development director Markham McIntyre**, an appointed Seattle government official, used Seattle city resources to ask Seattle city employees for their personal contact information so that he could put them on a mailing list to solicit support for Mayor Bruce Harrell's campaign. This appears to be a flagrant violation of RCW 42.17A.555 and SMC 4.16.070 prohibiting use of public resources for the purposes of assisting a campaign or for the private benefit of an individual rather than the city.

Additionally, Bruce Harrell's campaign violated Seattle laws and ethics rules for targeting city employees in campaign solicitations. If there were collusion between Mr Harrell and Mr McIntyre, Mr Harrell violated state law as well.

For expediency **I am submitting a combined complaint to both the Washington Public Disclosure Commission and Seattle Ethics and Elections Commission.** I urge the Washington Public Disclosure Commission and Seattle Ethics and Elections Commission to investigate this matter thoroughly, including interviewing all impacted Seattle City Directors and reviewing all email correspondence from Mr McIntyre, Marta Johnson, and the Harrell Campaign on this matter.

I am alleging the following:

- Per RCW 42.17A.555 Mr McIntyre violated Washington law because as a Seattle City employee he used the facilities of a public office directly for the purpose of assisting a campaign for election of Bruce Harrell to the office of Mayor of Seattle.
- Per SMC 4.16.070 - Prohibited conduct Mr McIntyre violated Seattle municipal code and ethics rules because he used his official position for a purpose that is, **or would to a reasonable person appear to be**, *primarily for the private benefit of Mayor Bruce Harrell* rather than primarily for the benefit of the City, and that he used or attempted to use City property for a purpose which is, **or to a reasonable person would appear to be**, for *other than a City purpose*.
- If Mr McIntyre acted in concert with Mayor Harrell, then Mayor Harrell may also have violated **RCW 42.17A.555** by encouraging the use of any of the facilities of a public office for the purpose of assisting his campaign.

- The Harrell Campaign violated SMC 2.04.380 through solicitations that specifically targeted City employees and by not limiting other solicitations only to City employees who expressly requested to be added to a mailing list.
- Additionally, Mayor Bruce Harrell violated Seattle Ethics Rules by knowingly and explicitly soliciting contributions from people in Mayor Harrell's chain of command.

Facts of the case

On 8/5/2025 at about 8pm initial primary election results were released, showing Mayor Bruce Harrell was trailing challenger Katie Wilson by 1.3%.

On 8/6/2025 at 4:06am (per city documents) Mr McIntyre, sent a message to a City of Seattle Microsoft Teams chat with all City of Seattle department heads, who all report up to Mayor Bruce Harrell. The message was "Hi friends, I'm interested in connecting you y'all outside of work. Can you put your personal cell and email into the chat?" After receiving a number of replies, about an hour later Mr McIntyre replied on the group chat "Thanks! I'll put these into a spreadsheet and share via personal email."

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Shortly thereafter, Bruce Harrell Campaign Manager Marta Johnson began sending emails to department heads' personal addresses. The first one thanked them for agreeing to help the campaign of their boss "in the final stretch."

To summarize:

1. Mr McIntyre solicited personal contact information from his coworkers.
2. Mr McIntyre told them he was providing that contact information to the Harrell campaign.
3. Mr McIntyre did provide that contact information to the Harrell campaign.
4. The Harrell campaign knowingly accepted this contact information.
5. The Harrell campaign created a mailing list or added to a mailing list the contact information of known city employees obtained from Mr McIntyre .
6. The Harrell campaign then contacted these city employees.

7. Presumably at least some of the emails from the Harrell campaign included solicitation for contributions.

Violations of Washington Election and Seattle Ethics & Election Laws by Mr McIntyre

1. RCW 42.17A.555 states "No elective official nor any employee of his or her office nor any person appointed to or employed by any public office or agency may use or authorize the use of any of the facilities of a public office or agency, directly or indirectly, for the purpose of assisting a campaign for election of any person to any office". Additionally, the Seattle Ethics Public Employee Rights document" stipulates that "City employees also may not: Use or allow others to use City facilities and equipment, including the following, to assist a candidate or to support or oppose a ballot measure: office equipment, including: phone, cell phone, computer"
    a. Mr McIntyre used city equipment to assist a candidate by messaging his coworkers via Microsoft Teams to obtain their personal contact information which he shortly thereafter provided to the Harrell Campaign.
2. The Seattle Ethics Frequently Asked Questions stipulates that "City employees cannot use City resources for campaign purposes".
    a. Mr McIntyre used the City's Microsoft Teams account to solicit personal contact information which he then provided in a timely manner to the Harrell campaign.
3. The Seattle Ethics Frequently Asked Questions stipulates that City employees cannot give information to campaign committees unless it is "information that would be provided to any member of the general public who requests it. Information should not be developed for the exclusive use of a campaign."
    a. Mr McIntyre developed information (the spreadsheet of non-public and personal contact information) for the exclusive use of the Harrell campaign.
4. The Seattle Ethics Frequently Asked Questions stipulates that City "employees are prohibited by State and City laws from using City resources--including fax and e-mail--for campaign purposes".
    a. Mr McIntyre used the City's Microsoft Teams account as part of his effort to assist the Harrell campaign.
5. The Seattle Ethics Public Employee Rights document stipulates that "A city official, candidate or their representative may not ask a city employee to be on a mailing list, if the mailing list will be used to solicit campaign contributions."
    a. Mr McIntyre asked his coworkers for their contact information to put them onto a Harrell mailing list where, presumably requests for contributions were made.
6. Finally per SMC 4.16.070 - Prohibited conduct Mr McIntyre violated Seattle municipal code and ethics rules because he used his official position for a purpose that is, or would to a reasonable person appear to be, *primarily for the private benefit of Mayor Bruce Harrell* rather than primarily for the benefit of the City, and that he used or attempted to use City property for a purpose which is, or to a reasonable person would appear to be, for *other than a City purpose*.

Violations of Seattle Municipal Code and Ethics Rules by the Bruce Harrell Campaign

1. The Seattle Ethics Public Employee Rights document states “A Seattle City official, candidate or someone representing a candidate or official may not knowingly solicit campaign contributions from any Seattle City employee”. And SMC 2.04.380 states such solicitation is allowed if the “solicitation is part of a general solicitation made to a significant segment of the public that may include, but does not target, City employees” or if “solicitation is made to a City employee who expressly requests to be added to a mailing list from the elected official or candidate for public office, political party, or political committee”.
    a. The contact information was not given to the Harrell Campaign by express request. Mr McIntyre collected contact information first and *subsequently disclosed* that it would be given to the Harrell Campaign. He also told his coworkers that they must **opt-out** of being added to a Harrell Campaign mailing list rather than **opting-in**.
    b. Ms Johnson knowingly added known City employees to her list obtained through Mr McIntyre’s ***opt-out*** process.
    c. It also appears that at least some of the emails sent to City employees were targeted to them.
    d. Additionally, the fact that City employees were ***targeted to be added*** to a Harrell Campaign list without express request, should poison their subsequent inclusion on even a general mass solicitation unless they separately expressly requested to be added.
2. The Seattle Ethics Public Employee Rights document states “A manager or supervisor cannot solicit campaign contributions from anyone in his or her chain of command”.
    a. Ms Johnson in her capacity as an agent of Mayor Bruce Harrell knowingly and explicitly solicited contributions from people in Mayor Harrell’s chain of command.

This discussion leaves open the question of whether Mr McIntyre acted solely on his own accord, or if his actions were taken at the behest of Mayor Bruce Harrell. I urge the PDC and Seattle Ethics and Elections Commission to subpoena both Mr McIntyre and Mr Harrell to obtain their statements under oath with penalty of perjury. If Mr McIntyre acted in concert with Mayor Harrell, then **Mayor Harrell may also have violated RCW 42.17A.555** by encouraging the use of any of the facilities of a public office for the purpose of assisting his campaign.

Relevant Rules and Laws

Seattle Ethics and Elections Commission: Frequently Asked Questions

1. If a City employee wants to run for public office or be active in a campaign, what restrictions apply?
Answer: **City employees cannot use City resources for campaign purposes.** For example, they cannot do campaign work at their City work stations or using City equipment, make campaign calls when they are on City time or in the workplace, place bumper stickers on City cars, display campaign signs or buttons in public work areas, or solicit contributions on City time or premises.

7. Can City employees give out or fax information to campaign committees?
Answer: Yes, employees may give information that is requested by campaigns if it is the employees' normal and regular job activity to do so. **The information that is provided must be information that would be provided to any member of the general public who requests it. Information should not be developed for the exclusive use of a campaign.**

Seattle Ethics and Elections Commission: PublicEmployeeRights.pdf

PROHIBITED ACTIVITY
The City's Elections Code has recently been amended to mirror some state law provisions. City law now provides that:

- **A Seattle City official, candidate or someone representing a candidate or official may not knowingly solicit campaign contributions from any Seattle City employee.**
- **A manager or supervisor cannot solicit campaign contributions from anyone in his or her chain of command.**
- **A city official, candidate or their representative may not ask a city employee to be on a mailing list, if the mailing list will be used to solicit campaign contributions.**
- **A city official, candidate or their representative may not target city employees in any mass solicitation of campaign contributions.**

City employees also may not:

- **Use or allow others to use City facilities and equipment**, including the following, to assist a candidate or to support or oppose a ballot measure:

- office equipment, including: phone, cell phone, **computer**, photocopier, fax machine, pager; stationery, postage; employees; public office space; property; vehicle; tools; publications of the agency; clientele lists of persons served by the agency.
- Do campaign work (volunteer or paid) on City paid time, except vacation and holidays. Be especially alert to conversations that start out as City business and gradually transition into campaigning. When that happens, stop the conversation and continue it when you are not on City time and not using City resources.

RCW 42.17A.555: Use of public office or agency facilities in campaigns—Prohibition—Exceptions.

No elective official nor any employee of his or her office nor any person appointed to or employed by any public office or agency may use or authorize the use of any of the facilities of a public office or agency, directly or indirectly, for the purpose of assisting a campaign for election of any person to any office or for the promotion of or opposition to any ballot proposition. Facilities of a public office or agency include, but are not limited to, use of stationery, postage, machines, and equipment, use of employees of the office or agency during working hours, vehicles, office space, publications of the office or agency, and clientele lists of persons served by the office or agency.

Chapter 4.16 - CODE OF ETHICS | Seattle Municipal Code

4.16.070 - Prohibited conduct

A covered individual may not engage in any of the following acts:

B. Improper use of official position

1. **Use or attempt to use his or her official position for a purpose that is, or would to a reasonable person appear to be, primarily for the private benefit of the covered individual or any other person, rather than primarily for the benefit of the City,** except as permitted by Section 4.16.071;

2. **Use or attempt to use, or permit the use of any City funds, property, or personnel, for a purpose which is, or to a reasonable person would appear to be, for other than a City purpose, except as permitted by Section 4.16.071;** provided, that nothing shall prevent the private use of City property which is available on equal terms to the public generally (such as the use of library books or tennis courts), the use of City property in accordance with municipal policy for the conduct of official City business (such as the use of a City automobile), if in fact the property is used appropriately; or the use of City property for participation of the City or its officials in activities of associations that include other governments or governmental officials;

2.04.380 - Solicitation of contributions by elected officials, candidates or their agents | Seattle Municipal Code

1. No elected official, candidate, or an **official's or candidate's agent may knowingly solicit, directly or indirectly, a contribution to** an office fund created under Section 2.04.180, a **candidate for public office,** a political party, or a political committee **from a City employee** or any member of a City board or commission.
2. This Section 2.04.380 **shall not prohibit an elected official or a candidate from soliciting contributions from City employees if** any of the following conditions apply, and the solicitation does not otherwise violate the provisions of this Chapter 2.04:
    1. **The solicitation is part of a general solicitation made to a significant segment of the public that may include, but does not target, City employees;**
    2. The solicitation is part of a general solicitation made at a gathering that may include, but does not target, City employees;
    3. The solicitation is made to a City employee who, subsequent to July 24, 2009, makes an unsolicited contribution to the elected official or candidate for public office, political party, or political committee making the solicitation;
    4. **The solicitation is made to a City employee who expressly requests to be added to a mailing list from the elected official or candidate for public office, political party, or political committee; and**
    5. Any other similar circumstance as may be prescribed by rule by the Commission pursuant to Section 3.70.100.

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.

Paul Chapman