


From: **LeBeau, Rene** Rene.LeBeau@seattle.gov 
Subject: RE: Tammy C4
Date: September 10, 2019 at 4:29 PM
To: Abbot Tay or [REDACTED]
Cc: Grow, Polly Polly.Grow@seattle.gov

RL

Hello Abbot,

Sorry for the delay in response. In terms of your campaign valuation calculations, I received this from Wayne to share with you.

Both the law in place when the Commission adopted Rule 16H in 2017 and the revisions to the law made last year, make it clear that a release from the Maximum Campaign Valuation (MCV) becomes effective when the candidate crosses the MCV threshold.

Here's the language from the old section:

SMC 2.04.630(f): If a qualified candidate demonstrates to SEEC that he or she has an opponent (whether or not participating in the Program) whose campaign spending has exceeded the Campaign Spending Limit for the position sought as indicated above, where SEEC deems the excess material it shall allow such candidate to choose to be released from the Campaign Spending Limit and campaign contribution limits for the Program, in which case **SEEC shall allow such candidate to redeem his or her Democracy Vouchers received theretofore or thereafter up to the amount of the Campaign Spending Limit only, then** allow such candidate to engage in campaign fundraising without regard to any Program requirements.

SMC 2.04.634.B: A qualified candidate may demonstrate to the Commission that an opponent's campaign valuation, or the sum of an opponent's campaign valuation and independent expenditures either adverse to the candidate or in favor of at least one opponent, is higher than the relevant figure in Table A for 2.04.634. If the Commission does not find the excess valuation inadvertent and minor, the Commission shall allow the candidate to be released from the maximum campaign valuation. If the demonstration does not involve independent expenditures, the Commission also shall allow the candidate to be released from the campaign contribution limit. **The Commission shall allow the released candidate to redeem democracy vouchers up to an amount that does not bring the campaign valuation above the maximum; after redemption,** the candidate may engage in campaign fundraising without regard to anything in this subsection 2.04.634.B from which the candidate has been released.

Rule 16H does reference the date the Commission **decides** to grant the release, and in 2017 that date was used by the Commission in calculating the General election spending limit for the two campaigns who requested and received a release from the Primary spending limit that year. But in 2017, the one candidate was at 93% of the spending limit and the other was at 97% when they requested the release. This year, one candidate requested a release when they had only raised 55% of the MCV. To say that all funds raised and spent after that date do not count against the General MCV would not be consistent with the language of the Law, nor would it be consistent with the intent of the Rule, which was, as the Commission stated at its August meeting, to "reset the clock" for the General in a way that doesn't inappropriately advantage a candidate over their opponents by virtue of their participation in the Program

opportunities by virtue of their participation in the program.

Wayne asked that you contact him directly if you have questions.

Otherwise, can you please resend your calculations for all of your general election candidates – Morales, Pugel, Wills, and Tavel using the above MCV calculation.

I'm here all day tomorrow if you'd like to discuss.

René



René LeBeau

Democracy Voucher Program Manager
City of Seattle - Seattle Ethics and Elections Commission
Office: 206-615-0091 [Website](#) | [Twitter](#) | [Facebook](#)

From: LeBeau, Rene
Sent: Tuesday, August 20, 2019 12:27 PM
To: Abbot Taylor [REDACTED]
Cc: Grow, Polly <Polly.Grow@seattle.gov>; Courtney, Chrissy <Chrissy.Courtney@seattle.gov>
Subject: RE: Tammy C4

Hi,
As discussed on the phone, we'll release 73,500.

René



René LeBeau

Democracy Voucher Program Manager
City of Seattle - Seattle Ethics and Elections Commission
Office: 206-615-0091 [Website](#) | [Twitter](#) | [Facebook](#)

From: Abbot Taylor [REDACTED]
Sent: Tuesday, August 20, 2019 11:48 AM
To: LeBeau, Rene <Rene.LeBeau@seattle.gov>
Cc: Grow, Polly <Polly.Grow@seattle.gov>; Courtney, Chrissy <Chrissy.Courtney@seattle.gov>
Subject: Re: Tammy C4

CAUTION: External Email

Let's go right to the limit and say \$73,600.

On Aug 20, 2019, at 11:45 AM, LeBeau, Rene <Rene.LeBeau@seattle.gov> wrote:

You are correct, I had not figured in the unspent funds. I will release \$73,000 this week.

René

<image003.png> **René LeBeau**
Democracy Voucher Program Manager
City of Seattle - Seattle Ethics and Elections Commission
Office: 206-615-0091 [Website](#) | [Twitter](#) | [Facebook](#)

From: Abbot Taylor [REDACTED]
Sent: Tuesday, August 20, 2019 10:56 AM
To: LeBeau, Rene <Rene.LeBeau@seattle.gov>
Cc: Grow, Polly <Polly.Grow@seattle.gov>; Courtney, Chrissy <Chrissy.Courtney@seattle.gov>
Subject: Re: Tammy C4

CAUTION: External Email

I'm worried about the \$74k, since I show us only about to take \$73,600. How about \$73k instead?

Abbot

On Aug 20, 2019, at 10:37 AM, LeBeau, Rene <Rene.LeBeau@seattle.gov> wrote:

Hello Abbot,

I'm going to release \$74,000 in vouchers right now.

Wayne will be back next week and I'm going to want to check in with him before we make a final disbursement. We won't count against you any funds you raise between now and that final disbursement. Can you send me what you show the CVs of all of your candidates going into the General?

René

<image003.png> **René LeBeau**

<image002.png>Rene LeBeau
Democracy Voucher Program Manager
City of Seattle - Seattle Ethics and Elections Commission
Office: 206-615-0091 [Website](#) | [Twitter](#) | [Facebook](#)

-----Original Message-----

From: Abbot Taylor [REDACTED]
Sent: Monday, August 19, 2019 4:43 PM
To: LeBeau, Rene <Rene.LeBeau@seattle.gov>
Subject: Tammy C4

CAUTION: External Email

Hey René-

Here's my math for the limits.

CV when released: \$74,910.57
COH after Primary expenses (C4 attached): \$1,318.11 Total
General CV (\$150k-CV-COH): \$73,771.32

We've had \$150 in General contributions, so total possible voucher payout is \$73,621.32. So if you can do \$73,600 instead, that works for us.

Abbot