



State of Washington

PUBLIC DISCLOSURE COMMISSION

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Memorandum

To: Public Disclosure Commission

From: Colin Peeples, Compliance Officer

Date: March 6, 2026

Subject: Niko Battle Enforcement Hearing Memorandum: PDC Case 178136

NOTE: Effective Jan. 1, 2026, Chapter 42.17A RCW was recodified to Title 29B RCW. Because the events at issue in this investigation occurred in 2025, this investigation uses the citations to Chapter 42.17A.

Allegations:

PDC staff alleges that Niko Battle, a candidate for Everett City Council violated RCW 42.17A.235, RCW 42.17A.240, RCW 42.17A.405, WAC 390-16-04 and WAC 390-17-300 for failure to timely and accurately file contribution (C-3) and expenditure (C-4) reports, failure to provide books of account upon request, spending general election contributions for the primary election when doing so caused general election contributors to exceed their primary election contribution limit, and by failing to return general election contributions after being disqualified from the general election ballot.

Background:

- On August 16, and September 13, 2025, PDC received complaints filed by Jacob Read and Conner Edwards alleging that Niko Battle violated RCW 42.17A.235, RCW 42.17A.240 for failing to timely and accurately file C-3 and C-4 reports, alleging violation of 42.17A.405 and WAC 390-17-300 for accepting and spending general election contributions when not on the general ballot.
- On September 12, 2025, PDC staff requested Respondent's campaign books of account. Mr. Battle furnished partial records. PDC staff requested complete books of account as required per WAC 390-16-043(9), including invoices, receipts, bank records for all activity on multiple occasions with no response.
- On September 9, 2025, Mr. Battle was removed from the general election ballot for failure to meet residency requirements in the jurisdiction he was a candidate.

Allegation 1 – Missing C-4 Reports

- The post primary C-4 report was due on September 10, 2025, covering July 29 – August 31, listing expenditures and contributions.
- The post election report has not been filed.

Allegation 2 – Failure to Provide Books of Account Upon Request

- On September 12, October 10, 15, 2025, PDC staff requested the books of account for Mr. Battle's campaign. On October 16, 2025, Mr. Battle partial campaign records. PDC staff requested additional records including receipts, invoices and bank records as required per WAC 390-16-043(9).
- On October 27, 2025, Mr. Battle emailed PDC staff asking for two more weeks to provide the records. On November 21, 2025, He additionally informed PDC staff he had the records and would be provided by the end of the weekend. (Exhibit 1)
- PDC staff has not received campaign books of account.

Allegation 3 – Spending general election contributions for the primary election when to doing so caused general election contributors to exceed their primary election contribution limit, and by failing to return general election contributions after being disqualified from the general election ballot.

- PDC staff found the 7-day pre primary C-4 had an ending balance of \$556.48, indicating general election contributions were spent in the primary, causing PDC staff to update the allegations. (Exhibit 2)
- Respondent has not yet filed all required C4 reports. However, based on the records that have been filed, PDC staff determined that at least \$643.52 in general election contributions were spent on primary election activity.

Attachments:

Niko Battle 178136 Exhibit 1
Niko Battle 178136 Exhibit 2

Niko Battle

replied

4 months ago (Mon, 27 Oct 2025 at 8:55 AM)

To:"PDC Support" <pdcc@pdc.wa.gov>

External Email

Colin,

Good morning, I hope this email finds you well. I'm working hard to find all the receipts and invoices I can. I know for sure there's a box with the majority of the campaigns receipts but haven't been able to locate it just yet and am still finding one off receipts I've saved here and there.

Can I request a couple more weeks to find all of the supporting documentation you've requested?

Apologies on the tardy response.

All the best,

Niko Battle

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**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**
C4

Niko Battle
Friends of Niko Battle -
2817 Wetmore Ave
Everett, WA 98201
CITY COUNCIL MEMBER
CITY OF EVERETT

Coverage: 07/15/2025 to 07/28/2025
Report number: 110303494
Election year: 2025
Date submitted: 07/29/2025

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$9,653.70
2. Cash received (Schedule A line 1).	\$2,920.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$2,920.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$12,573.70
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$10,107.15
11. Cash expenditures (Line 3 schedule A).	\$1,910.07	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$1,910.07
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$12,017.22

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$556.48
Line 18 should equal your reconciled bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$556.48

Candidate name
Niko Battle

I certify this report is true and complete to the best of my knowledge
Treasurer's name and date
Jacob Read - 07/29/2025

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
07/15/2025	\$600.00	07/17/2025	\$2,050.00	07/21/2025	\$100.00
07/16/2025	\$120.00	07/18/2025	\$50.00		

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$2,920.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Credit/Debt	Cash
N/A	Expenses	Non-itemized expenditures		\$810.07
07/15/2025	Shell Oil 3702 Broadway Ave , Everett, WA 98201	Other: Gas		\$100.00
07/19/2025	Shell Oil 3702 Broadway Ave , Everett, WA 98201	Travel, accommodations, meals: Gas cards for volunteers & staff		\$100.00
07/19/2025	Roughlidge Chris 2817 Wetmore Ave , Everett, WA 98201	Management and consulting services: Campaign management and consulting services		\$400.00
07/20/2025	Shell Oil 3702 Broadway Ave , Everett, WA 98201	Travel, accommodations, meals: Gas cards for volunteers & staff		\$100.00
07/28/2025	Shell Oil 3702 Broadway Ave , Everett, WA 98201	Travel, accommodations, meals: Gas cards for volunteers & staff		\$100.00
07/28/2025	Roughlidge Chris 2817 Wetmore Ave , Everett, WA 98201	Management and consulting services: Campaign management and consulting services		\$300.00
			\$0.00	\$1,910.07

4. TOTAL EXPENDITURES: \$1,910.07