



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

November 13, 2018

Delivered electronically to “taki.flevaris@pacificallawgroup.com”

Subject: PDC Case 34582

Dear Alisha Topper:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Glen Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of timely filing C-3 and C-4 in accordance with PDC laws, rules and reporting requirements. PDC staff expects that you will file timely reports in future years in accordance with PDC laws and rules.

If you have questions, you may contact Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

Amended letter



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November 13, 2018

Delivered electronically to Glen Morgan at glenmorgan89@gmail.com

Subject: Complaint regarding, Alishia Topper, PDC Case 34582

Dear Mr. Morgan,

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed April 11, 2018 against Alishia Topper a candidate for State Representative in 2016 and Vancouver City Council in 2017.

The complaint alleged violations of RCW 42.17A.235 and .240 by failing to timely file complete and accurate Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditure reports (C-4 reports).

PDC staff reviewed the allegations listed in the complaints in light of PDC laws and rules in order to determine whether a formal investigation or enforcement action is warranted. Staff reviewed the Candidate Registration (C-1), C-3 and C-4 reports filed by Elect Alishia Topper (Campaign) and the response from Taki V. Flevaris of Pacifica Law Group, Counsel for the Topper Campaigns.

Based on staff's review, we found the following:

- Alishia Topper filed a C-1 with the commission on Oct. 29, 2015, declaring candidacy for State Representative for the 49th District, Pos. 2. She advanced to the 2016 General Election, however was not elected to the Legislature on Nov. 8, 2016.
- On Feb. 27, 2017 Alishia Topper filed a C-1 with the commission declaring candidacy for Vancouver City Council. There was no 2017 primary election for this office. On Nov. 7, 2017, she was elected to City of Vancouver City Council, Pos. 2.
- Alishia Topper was first elected to the Vancouver City Council in 2013.

- Eight of the C-4 reports identified in the complaint were amended reports, while one C-3 report (#100673307) contained typographical errors in the year being reported.
- Alishia Topper’s 2017 7-day pre-general election C-4 report (#100798399) was three days late, however filed four days before the 2017 election.
- In the response, Taki Flevaris stated “the Topper Campaigns involved over \$315,000 of campaign activity and over 275 reports in the aggregate. The spreadsheet attached to the complaint lists 21 allegedly late reports from the two campaigns.” He noted many corrections were made within four days or less.

Based on these findings, (1) Alishia Topper has filed close to 420 commission reports since 2013 with the majority filed timely and (2) the 2017 21-Day Pre-General Election C-4 reports was filed timely, staff has determined that in this instance, failure to timely file reports of contributions and expenditures does not amount to a material violation warranting further investigation.

The PDC is reminding Alishia Topper about the importance of timely filing C-3 and C-4 in accordance with PDC laws, rules and reporting requirements. The PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

In addition, the PDC has also dismissed the allegations listed in your complaints that were based “on information and belief” in accordance with RCW 42.17A.755(1), since you failed to provide any evidence to support or substantiate those allegations.

If you have questions, you may contact Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Alishia Topper