



**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: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

Feb. 6, 2019

Delivered electronically to “[lisa.parshley@lisaforolympia.com](mailto:lisa.parshley@lisaforolympia.com) and [daniwestbrook@gmail.com](mailto:daniwestbrook@gmail.com)”

Subject: Complaint filed by Glen Morgan, PDC Case 26337

Dear Lisa Parshley:

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 has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of timely filing reports and properly breaking down expenditures in future years in accordance with PDC laws and rules. PDC staff expects that you will file timely in future years in accordance with PDC laws and rules.

If you have questions, you may contact me at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

Sincerely,

/s \_\_\_\_\_  
Alice Fiman  
Compliance Officer

Endorsed by,  
/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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Feb. 6, 2019

Delivered electronically to “[glen@wethegoverened.com](mailto:glen@wethegoverened.com)”

Subject: Complaint regarding Lisa Parshley, PDC Case 26337

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on Oct. 18, 2017. Your complaint alleged that Lisa Parshley, an Olympia City Council member, may have violated RCW 42.17A.235 and .240 for (1) failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign; (2) failing to timely and accurately report debt; (3) failing to report the address of donors.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the Nov. 19, 2017 response Danielle Westbrook, representing the campaign, sent to the Washington State Attorney General (ATG); the applicable PDC reports; and data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- Lisa Parshley filed a C-1 report to register as a candidate for the Olympia City Council on March 9, 2017. This was her first campaign in Washington state.
- On Nov. 7, 2017 Lisa Parshley was elected to the Olympia City Council. Her term ends December 31, 2021.
- The Committee to Elect Lisa Parshley filed an amended C-4 report on Sept. 10, 2017 for the period covering July 11 to July 24, 2017. The original report was filed timely, on July 24, 2017.

- The Committee to Elect Lisa Parshley filed an amended C-3 report on Sept. 10, 2017, listing \$550 in donations received on Aug. 15, 2017. The original report was filed timely, on Aug. 21, 2017.
- In her response, Danielle Westbrook stated “These reports were amended in response to Mr. Morgan’s first citizen action complaint. Also, we had no address for Rodney Daniels on the C3 referenced. Once it was acquired, the report was amended as allowed by the PDC.”
- In PDC’s enforcement guide, it states “Regularly recurring expenses of the same amount (such as rent, utilities, insurance, cellular phone costs, **and payments to campaign staff**) do not have to be reported unless they were past due on the last day of the reporting period. Danielle Westbrook responded, stating “Rob Richards’ campaign manager debt has been accurately reported. Whenever a payment was made to him, the expenditure was reported at that time. A \$200 payment was made on 08/28/17 and was accurately reflected as a payment towards the debt owed to him.”
- The Committee to Elect Lisa Parshley amended C-4 reports to reflect the piece counts as noted in your complaint.

**Allegation: Failure to include the addresses of donors.**

- You failed to provide any evidence to substantiate this allegation. Therefore, staff did not review it.

Parshley made minor or ministerial errors on reports filed for the 2017 election, including details of certain expenditures. Upon notification of these errors, Parshley timely amended her report making the necessary technical corrections.

Based on these findings staff has determined that, in this instance, the failure to provide the proper breakdown for expenditures does not amount to an actual violation warranting further investigation.

However, PDC staff is reminding Lisa Parshley of the importance of including a proper breakdown of expenditures. Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

/s\_\_\_\_\_

Alice Fiman  
Compliance Officer  
Endorsed by,

/s\_\_\_\_\_

Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director