

November 19, 2017

Tony Perkins
Investigator, Campaign Finance Unit
Washington Attorney General's Office
PO Box 40100
Olympia, WA 98504

RE: Lisa Parshley Campaign

Mr. Perkins,

I've thoroughly researched each of Mr. Morgan's complaints in his second citizen action notice complaint. Please find my responses in bold below.

Sincerely,

Danielle Westbrook
Lisa Parshley Campaign

To Whom it May Concern --

It has come to my attention that Lisa Parshley, during her campaign for the Olympia City Council has, once again, habitually and willfully committed frequent and multiple violations of RCW 42.17A.

1) Failure to file accurate, timely C3 and C4 reports. (Violation of RCW 42.17A.235)

State law requires that candidates and committees file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, Lisa Parshley has failed on numerous occasions to do this.

(See Exhibits A - "Illegally late reported C3 and C4 reports")

These reports were amended in response to Mr. Morgan's first citizen action complaint (see text on C4 attachment to amended report that states, "Amended to clarify expenditure description on Mailbox address expenditure and Rob Richards' campaign management expenditure for \$86.25." 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).

If we're expected to be completely transparent and fix errors made, but complaints are then made when we fix said errors, it's a lose/lose situation. Since these issues were addressed in the first complaint, I won't be addressing them again. It feels like double jeopardy.

2) Failure to accurately, timely report debt. (Violation of RCW 42.17A.240 (8), see WAC 390-05-295)

State law requires that the name and address of any person and the amount owed for any debt, obligation, note, unpaid loan, or other liability in the amount of more than two hundred fifty dollars or in the amount of more than fifty dollars that has been outstanding for over thirty days be reported on

form C4. Per WAC 390-05-295, this includes any oral or written order placed, debt or obligation to purchase goods or services or anything of value, or any offer to purchase advertising space, broadcast time or other advertising related product or service.

Lisa Parshley illegally failed to report the following debts: (See Exhibit B - "Illegal failure to timely report debts").

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.

3) Failure to properly break down, describe expenses. (Violation of RCW 42.17A.235, see WAC 390-16-205, WAC 390-16-037)

State law requires that expenditures made on behalf of a candidate or political committee by any person, agency, firm, organization, etc. employed or retained for the purpose of organizing, directing, managing or assisting the candidate's or committee's efforts shall be deemed expenditures by the candidate or committee. In accordance with WAC 390-16-037 and WAC 390-16-205, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly. Additionally, in accordance with WAC 390-16-037, the exact purpose of the expenditure, the quantity of items printed, and the individual value of broadcast ads distributed on various media outlets must be disclosed on form C4.

Lisa Parshley illegally failed to break down the following expenses. (See Exhibit C - "Illegal failure to break down expenditures")

Based on my research, a piece count is only necessary in independent expenditure campaigns, not in candidate campaigns. If I am wrong, I will gladly amend reports to reflect piece count.

4) Failure to include the addresses of donors. (Violation of RCW 42.17A.235, .240) Parshley illegally failed to include the following addresses of donors to her campaign, in violation of state law:

I need more information. Which addresses haven't been supplied on which reports?

Parshley must amend these severely late reports to include addresses as soon as possible to avoid additional penalties under state law.

The PDC should investigate the possibility that Lisa Parshley committed the above violations maliciously, which would be a class C felony per RCW 42.17A.750 (2)(c). If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately. Please don't hesitate to contact me

if you need any additional information.