

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Tue, 22 Aug at 9:51 AM) via Portal [Meta](#)
To Whom it May Concern –

It has come to my attention that Lisa Parshley – a candidate for Olympia City Council has violated provisions of RCW 42.17A.

1) Failure to timely file C3 & C4 reports on day C1 is filed. (Violation of RCW 42.17A.235(1))

State law requires that candidates and committees submit reports containing all contributions received and expenditures made on the same day they submit their statement of registration (C1).

Unfortunately, despite having paid for her website domain on 3/3/2017, Parshley failed to file a C4 report. Parshley has still not reported the purchase of the website domain, or the creation of the website as an in-kind contribution or expenditure. (see attached)

2) Failure to timely 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, Parshley failed on numerous occasions to do this. (See Attachments Exhibit A: Illegally Late Reported/Deposited Contributions, Exhibit B: Illegally Late Reported Expenditures.)

3) Failure to report occupation and employer information for donors over \$100. (Violation of RCW 42.17A.240, WAC 390-16-037)

Washington's campaign finance law requires a campaign to timely report contributions received. The information required to be disclosed includes the name and address of the source of contributions that exceed \$25 in the aggregate, and the employer and occupation of any individual contributor giving more than \$100 in the aggregate. Unfortunately, Parshley failed to include this information for the following contributions:

DANIELS RODNEY 250.	3/13/2017	\$250.00 P	OLYMPIA	WA	98501
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4) 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. 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.

Parshley failed to illegally report the following debts on preceding C4s: (See Attachment C: Illegal Failure to Report Debt.)

In addition to this list of debts illegally not reported there was another likely debt related to Parshley's hiring of Danielle Westbrook as a consultant who provides services at a market cost (See link of Westbrook consulting fees paid by candidates: <http://web.pdc.wa.gov/MvcQuerySystem/AdvancedSearch/ExpendituresDataspender=ALL&electionYear=ALL&dateFrom=&dateThru=&amountFrom=&amountThru=&committeeType=IGNORE&city=&state=&zip=&vendor=westbrook&description=>) Parshley is not reporting receipt of these services from

Westbrook as a debt or in-kind contribution subject to limits. On information and belief, this is most accurately reported as debt.

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

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**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly.

Parshley illegally failed to break down the following expenses: (See **Attachment D: Illegal Failure to Breakdown Expenditures**)

6) Failure to report expenditure/in-kind contributions. (Violation of RCW 42.17A.235)

a) Professional Photography, Videography.

Parshley failed to report expenditures/in-kind contribution for professional photography. You can find examples of this professional photography here: <http://www.lisaforolympia.com/>

You can find an example of the professional video here campaign produced here: <https://www.facebook.com/LisaForOlympia/videos/1928611694084626/>

The source (and value) of these pieces of professional photography and videography must be reported.

b) PO Box.

On her C1 Parshley lists 120 State Ave #113, in Olympia as her Committee's mailing address. The purchase cost of this PO Box is required to have been listed as an in-kind contribution from the person who purchased it for the campaign. Unfortunately, this has not happened.

c) Filing Fee.

Parshley failed to list her filing fee as an in-kind contribution to her own campaign.

Because the filing fee was a campaign-related expense, it must have been reported to the public. This is clearly required by state law.

In fact, Attorney General Slade Gorton rendered an official AG opinion on this exact matter in 1974, when he wrote, in part:

"In simplest terms, this payment (in those cases in which it is required) is a necessary part of the candidate's financial outlay if he is to have his name appear on the ballot and, in that manner, become eligible to be elected to the office he is seeking. Moreover, the payment is very clearly a transfer of something of value and it cannot be doubted that it is for the purpose of assisting the candidate and furthering his election campaign. Payment of the filing fee is thus precisely within the broad definition of "expenditure" as set forth above." -- AGO 1974 No. 16 - July 29, 1974

7) Failure to list Danielle Westbrook as a committee officer. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245.

Parshley failed to list Westbrook as an officer, which is required by **RCW 42.17A.205(2)(c)**. On information and belief, Westbrook is the consultant for Parshley's campaign.

I believe that Parshley should have been listed her as a committee officer, because Westbrook, in conjunction with others, made, directed, or authorized expenditures, strategic or policy decisions on behalf of the committee.

WAC 390-05-245 defines committee officer as: "...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any **person** who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee" .

Please note that **RCW 42.17A.005 (35)** defines "person" as: "...an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized."

8) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C-1 form. (Violation of RCW 42.17A.425)

State law requires that: "No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form..."

Despite doing most of the ordering for mail projects for the Parshley campaign, Danielle Westbrook did not appear as an officer on Parshley's C1 form.

9) Failure to timely submit accurate F1. (Violation of RCW 42.17A.700, .710)

Parshley failed to submit an F1 containing all the information required by state law until August 14th, 2017. This is well past the statutory 2 week deadline from when she started her campaign.

The PDC should investigate the possibility that 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.

Best Regards,

Glen Morgan

Exhibit A -- Illegally Late Reported Deposits of Contributions

Violation #	Contribution_date	Deposit Date	Days Late Deposit	Due Date C3	Date Reported	Days Late C3	Amount	Contributor
1	3/13/2017	3/27/2017	7	4/10/2017	4/10/2017	0	\$27.00	NICHOLAS JASON 27.0
2	3/13/2017	3/27/2017	7	4/10/2017	4/10/2017	0	\$27.00	DUTELLE AUTUMN 27.0
3	3/13/2017	3/27/2017	7	4/10/2017	4/10/2017	0	\$250.00	DANIELS RODNEY 250.
4	3/16/2017	3/27/2017	4	4/10/2017	4/10/2017	0	\$5.00	SMALL CONTRIBUTIONS
5	3/16/2017	3/27/2017	4	4/10/2017	4/10/2017	0	\$100.00	STROHECKER CATHERINE
6	3/16/2017	3/27/2017	4	4/10/2017	4/10/2017	0	\$27.00	TUZZOLINO SUSAN
7	3/16/2017	3/27/2017	4	4/10/2017	4/10/2017	0	\$100.00	FRASCA MARILYN 100.

Exhibit B -- Illegally Late Reported Expenditures

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
1	3/1/2017	4/10/2017	7/24/2017	105	EXPENSES OF \$50	\$105.80	
2	3/27/2017	4/10/2017	7/24/2017	105	ABIGAIL STUART HOUSE	\$250.00	KICKOFF RENTAL DEPOSIT
3	3/27/2017	4/10/2017	7/24/2017	105	ABIGAIL STUART HOUSE	\$300.00	RENT FOR KICK OFF PARTY
4	5/1/2017	6/12/2017	7/24/2017	42	EXPENSES OF \$50	\$188.67	
5	5/11/2017	6/12/2017	7/24/2017	42	RICHARDS ROB	\$305.75	CAMPAIGN MANGER
6	5/11/2017	6/12/2017	7/24/2017	42	CAPITOL CITY PRESS	\$263.88	CONTRIBUTION ENVELOPES
7	5/18/2017	6/12/2017	7/24/2017	42	CAPITOL CITY PRESS	\$1,347.64	SIGNS
8	5/23/2017	6/12/2017	7/24/2017	42	JACKNUT APPAREL	\$108.90	SIGNS
9	6/1/2017	7/11/2017	7/24/2017	13	EXPENSES OF \$50	\$379.91	
10	6/20/2017	7/11/2017	7/24/2017	13	OLYMPIA COPY AND PRINT	\$57.66	PRINTING
11	6/22/2017	7/11/2017	7/24/2017	13	WASHINGTON STATE DEMOCRATS	\$100.00	VOTEBUILDER
12	6/26/2017	7/11/2017	7/24/2017	13	RICHARDS ROB	\$200.00	CAMPAIGN MANAGEMENT FEE

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
13	6/29/2017	7/11/2017	7/24/2017	13	CAPITOL CITY PRESS	\$967.32	CAPITOL CITY PRESS, PAID FOR BY IN-KIND LOAN FROM DANIELLE WESTBROOK
14	7/2/2017	7/11/2017	7/24/2017	13	OLYMPIA COFFEE ROASTERS	\$71.88	COFFEE SERVICE FOR VOLUNTEER BBQ
15	7/4/2017	7/11/2017	7/24/2017	13	CAPITAL LAKEFAIR	\$175.00	PARADE ENTRY FEE
16	6/29/2017	7/11/2017	7/24/2017	13	WESTBROOK DANIELLE	\$967.32	CAPITOL CITY PRESS POSTCARDS 888.26, TAX 79.06
					Total	\$5,789.73	

Exhibit D -- Illegal Failure to breakdown expenditures.

Violation #	Vendor	Date	Amount	Description	
1	CAPITOL CITY PRESS	2017-06-29	\$ 967.32	CAPITOL CITY PRESS	Failure to identify item purchased.
2	THE MAILBOX	2017-07-19	\$ 135.59	3874 ADDRESS	Failure to adequately describe expenditure.
3	RICHARDS ROB	2017-07-24	\$ 86.25	CAMPAIGN MANAGEMENT	This is likely a reimbursement that has been miscategorized as campaign management.
		Total	\$ 1,189.16		



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lisaforolympia.com

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DOMAIN INFORMATION

Domain: lisaforolympia.com
Registrar: DomainPeople, Inc.
Registration Date: 2017-03-03
Expiration Date: 2018-03-03
Updated Date: 2017-03-11
Status: ok
Name Servers: sp1.domainpeople.com, sp2.domainpeople.com

REGISTRANT CONTACT

Name: THOMAS ALLEN
Organization: THOMAS ALLEN
Street: 120 STATE AVE NE #113
City: OLYMPIA
State: WA
Postal Code: 98501
Country: US
Phone: +1.5037290118
Email: THOMAS.ALLEN@OVCCPETS.COM

ADMINISTRATIVE CONTACT

Name: THOMAS ALLEN
Organization: THOMAS ALLEN
Street: 120 STATE AVE NE #113
City: OLYMPIA
State: WA
Postal Code: 98501
Country: US
Phone: +1.5037290118
Email: THOMAS.ALLEN@OVCCPETS.COM

TECHNICAL CONTACT

Name: THOMAS ALLEN
Organization: THOMAS ALLEN
Street: 120 STATE AVE NE #113
City: OLYMPIA
State: WA
Postal Code: 98501
Country: US
Phone: +1.5037290118
Email: THOMAS.ALLEN@OVCCPETS.COM

RAW WHOIS DATA

Domain Name: LISAFOROLYMPIA.COM
Registry Domain ID: 2101889232_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.domainpeople.com

Advertisement for .club domain sale. Price: \$11.88 to \$0.98. Includes 'BUY NOW' button and 'Sale' badge.

Advertisement for .fun domain hot deals. Price: \$4.28 to \$23.88. Includes 'fun' logo and 'Hot Deals!' text.

Advertisement for Web Hosting. Features: Easy, Reliable, Affordable. Includes list of benefits and 'View Plans' button.

```
Registrar URL: www.domainpeople.com
Updated Date: 2017-03-02T17:12:39.00Z
Creation Date: 2017-03-03T01:12:00.00Z
Registrar Registration Expiration Date: 2018-03-03T01:12:00.00Z
Registrar: DOMAINPEOPLE, INC.
Registrar IANA ID: 65
Domain Status: ok https://www.icann.org/epp#ok
Registry Registrant ID:
Registrant Name: THOMAS ALLEN
Registrant Organization: THOMAS ALLEN
Registrant Street: 120 STATE AVE NE
Registrant Street: #113
Registrant City: OLYMPIA
Registrant State/Province: WA
Registrant Postal Code: 98501
Registrant Country: US
Registrant Phone: +1.5037290118
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: THOMAS.ALLEN@OVCCPETS.COM
Registry Admin ID:
Admin Name: THOMAS ALLEN
Admin Organization: THOMAS ALLEN
Admin Street: 120 STATE AVE NE
Admin Street: #113
Admin City: OLYMPIA
Admin State/Province: WA
Admin Postal Code: 98501
Admin Country: US
Admin Phone: +1.5037290118
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: THOMAS.ALLEN@OVCCPETS.COM
Registry Tech ID:
Tech Name: THOMAS ALLEN
Tech Organization: THOMAS ALLEN
Tech Street: 120 STATE AVE NE
Tech Street: #113
Tech City: OLYMPIA
Tech State/Province: WA
Tech Postal Code: 98501
Tech Country: US
Tech Phone: +1.5037290118
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: THOMAS.ALLEN@OVCCPETS.COM
Name Server: SP1.DOMAINPEOPLE.COM
Name Server: SP2.DOMAINPEOPLE.COM
DNSSEC: unSigned
Registrar Abuse Contact Email: abuse@domainpeople.com
Registrar Abuse Contact Phone: +1.6046391680
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2017-03-02T17:12:39.00Z <<<
```

For more information on Whois status codes, please visit <https://icann.org/epp>

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is," and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to: (1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or (2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone. The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us.

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Version 6.3 4/3/2002

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