



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

January 24, 2019

Delivered electronically to "daniwestbrook@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Case 24566

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 in the letter 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 the accurate, complete, and timely disclosure of all contribution and expenditure activities, including debts and expenditure details, and the accurate and timely filings of all future PDC reports in accordance with the statutes and rules.

PDC staff is also reminding Lisa Parshley that under the current version of RCW 42.17A.240, debts whose value exceeds \$750 and have not been paid for invoices submitted, goods received, or services performed, are must be reported on the C-4 report if they have been outstanding for 5 business days during the period within 30 days before an election, or 10 business days during any other period.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

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



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January 24, 2019

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

Subject: Complaint regarding Lisa Parshley, PDC Case 24566

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 22, 2017. Your complaint alleged that Lisa Parshley may have violated RCW 42.17A.235 for 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; RCW 42.17A.240 for failure to accurately and completely report debts and obligations, and breakdown expenditure details in accordance with WAC 390-16-037; RCW 42.17A.205 for failure to accurately and completely disclose committee officers on the Candidate Registration (C-1 report); RCW 42.17A.425 for allowing non-committee officers to authorize expenditures; and RCW 42.17A.700 for failure to timely file a Personal Financial Affairs Statement (F-1 report), disclosing financial activities for twelve calendar months prior to becoming a Candidate.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Lisa Parshley; the applicable PDC reports filed by Respondent; and queried the Respondent’s 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:

- On April 10, 2017, Lisa Parshley timely filed C-3 report 100755632, disclosing \$536 in late-deposited contributions, or 1.8% of total contributions for the year, between 4-7 days beyond the 5 business days from receipt requirement set forth in RCW 42.17A.220.
- The alleged violations of RCW 42.17A.235 for failure to timely report expenditures on C-4 reports presented by the Complaint were for amended reports, which prior to the passage of ESHB 2938, effective June 6, 2018, were not considered timeliness violations if the underlying report was timely filed.
- On July 12, 2017, Lisa Parshley late filed the 21-Day Pre-Primary C-4 report 100774752, disclosing \$2625.05 in contributions, or 5.3% of total contributions in the year, and \$2021.87, for 5.1% of total expenditures, 1 day beyond the deadline set by RCW 42.17A.235.
- Lisa Parshley failed to timely report debts for political advertising as required by the version of RCW 42.17A.240 in effect at the time, for promises to pay over \$50 that have been outstanding for more than 30 days, or \$250 without time limitations.

- Lisa Parshley failed to accurately and completely report expenditure details for mailed political advertising, including the number of items printed.
- Lisa Parshley admits to failing to disclose Danielle Westbrook as Deputy Treasurer for the campaign, as required by RCW 42.17A.205 and amended the C-1 report to disclose this on August 15, 2017, after the Primary Election, but before receiving the Complaint.
- Lisa Parshley admits that Danielle Westbrook made expenditures for political advertising at the direction of Rob Richards, the campaign manager who was never listed on the C-1 report, in contravention of the prohibition set forth by RCW 42.17A.425.
- Lisa Parshley's late F-1 report was addressed during Group Enforcement in 2017 and will not be reexamined here.

Based on these findings staff has determined that, in this instance, failure to timely file the 21-day pre-Primary C-4 report and to accurately and completely disclosed debts and expenditure details, do not amount to actual violations warranting further investigation.

PDC staff is reminding Lisa Parshley about the importance of the accurate, complete, and timely disclosure of all contribution and expenditure activities, including debts and expenditure details, and the accurate and timely filings of all future PDC reports in accordance with the statutes and rules.

PDC staff is also reminding Lisa Parshley that under the current version of RCW 42.17A.240, debts whose value exceeds \$750 and have not been paid for invoices submitted, goods received, or services performed, are must be reported on the C-4 report if they have been outstanding for 5 business days during the period within 30 days before an election, or 10 business days during any other period.

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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

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

cc: Lisa Parshley