

## File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Mon, 9 Oct at 3:25 PM) via Portal **Meta**  
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"**)

### **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"**).

**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"**)

**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:

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.

Best Regards,

Glen Morgan

**Exhibit C -- Illegal Failure to breakdown/describe expenditures.**

| Approximate Cumulative Days Late -- 315 |                        |                                                                                         | As of -- 10/9/2017                                     |                               |
|-----------------------------------------|------------------------|-----------------------------------------------------------------------------------------|--------------------------------------------------------|-------------------------------|
| Violation #                             | Vendor                 | Date Amount Description                                                                 | Violation Report # Violation                           | Approx. days late as of today |
| 1                                       | OLYMPIA COPY AND PRINT | 6/20/2017 \$ 57.66 PRINTING                                                             | 100777419 Failure to identify number of items printed. | 90                            |
| 2                                       | JACKNUT APPAREL        | 5/23/2017 \$ 108.90 SIGNS                                                               | 100777418 Failure to identify number of items printed. | 121                           |
| 3                                       | CAPITOL CITY PRESS     | 6/29/2017 \$ 967.32 CAPITOL CITY PRESS,PAID FOR BY IN-KIND LOAN FROM DANIELLE WESTBROOK | 100777419 Failure to identify number of items printed. | 90                            |
| 4                                       | CAPITOL CITY PRESS     | 5/11/2017 \$ 263.88 CONTRIBUTION ENVELOPES                                              | 100777418 Failure to identify number of items printed. | 121                           |
| 5                                       | CAPITOL CITY PRESS     | 5/18/2017 \$ 1,347.64 SIGNS                                                             | 100777418 Failure to identify number of items printed. | 121                           |
| 6                                       | THE MAILBOX            | 7/19/2017 \$ 973.82 POSTAGE - MAILING DATE 07/18/17                                     | 100786163 Failure to identify number of items printed. | 76                            |
| 7                                       | JACKNUT APPAREL        | 7/12/2017 \$ 341.50 T-SHIRTS                                                            | 100786163 Failure to identify number of items printed. | 76                            |
| 8                                       | JACKNUT APPAREL        | 7/27/2017 \$ 108.90 JACKNUT APPAREL,SIGN DECALS \$100, TAX \$8.90, INVOICE PAID         | 100786165 Failure to identify number of items printed. | 78                            |
| Total                                   |                        | \$ 4,169.62                                                                             |                                                        |                               |

Exhibit B -- Illegal failure to timely report Debt

| Approximate Cumulative Days Late -- 76 |              |           |          |                           | As of -- 10/9/2017                                                                                                                                      |
|----------------------------------------|--------------|-----------|----------|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| Violation #                            | Vendor       | Date      | Amount   | Description               | Debt that was illegally not reported.                                                                                                                   |
| 1                                      | RICHARDS ROB | 8/28/2017 | \$200.00 | ROB RICHARDS,AUGUST WAGES | This was illegally not reported as debt on the 7-day preprimary report. Cumulatively, this debt to Richards is more than 30 days outstanding and more t |

rys late

## Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 60

| Violation # | Report #  | Report Type | Amended? Y/N | Deposit Date | Due Date  | Day Reported | Approximate Days Lat |
|-------------|-----------|-------------|--------------|--------------|-----------|--------------|----------------------|
| 1           | 100786163 | C4          | Y            |              | 7/25/2017 | 9/10/2017    | 47                   |
| 2           | 100786129 | C3          | Y            | 8/21/2017    | 8/28/2017 | 9/10/2017    | 13                   |

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