

Washington State Voter Registration Challenge Form

CLERK OF SUPERIOR COURT
SEP 12 2024

1 Personal Information of Challenger

Munson Geoffrey
last first middle suffix
15720 NE 25th Ave
residential address in Washington state apt #
Vancouver, WA 98686
city ZIP
214-282-0262 olsc.geoff@verizon.net
phone number email address

2 Personal Information of Challengee

Ley John P
last first middle suffix
8500 NE Hazel Dell Ave Apt H4
residential address in Washington state apt #
Vancouver, WA 98665
city ZIP
(360) 254-6225 ElectJohnLey@gmail.com
phone number email address

3 Basis of Challenge (provide evidence to support your challenge)

The challenged voter:

- is not a US citizen
- will not be at least 18 years old by the next election
- is convicted of a felony in Washington and serving a sentence of total confinement under the jurisdiction of the Department of Corrections, or a felony conviction in another state's court or federal court and voting rights have not been restored under RCW 29A.08.520
- has been judicially declared ineligible to vote due to mental incompetency under RCW 29A.08.515
- does not reside at the address listed on their voter registration and is not subject to RCW 29A.04.151 or RCW 29A.08.112

Provide voter's actual residential address if known:

444 NW Fremont St. Camus, WA
residential address city, state ZIP

4 Oath

I, Geoffrey Munson, declare under penalty of perjury under the laws of the State of Washington that I:

- am a registered voter in the State of Washington;
- have personal knowledge and belief that the person named above is not qualified to vote for the reason or reasons indicated in this affidavit;
- have exercised due diligence to personally verify the evidence that accompanies this affidavit;
- believe that the challenged voter is not qualified to vote or does not live at the address listed on their voter registration.

sign here



date here

9/16/2024

For official use:

Voter Challenge Summary: **John P. Ley**

VRDB Residential Address: **8500 NE Hazel Dell Ave Apt H4, VANCOUVER WA 98665**

Voter ID: **WA004696031**

Statutory Provisions

This Voter Challenge Summary and accompanying materials are presented with reference to RCW 29A.08.810(1)(c)(ii)(A) – (E) (<https://app.leg.wa.gov/RCW/default.aspx?cite=29A.08.810>).

- (A) **Certified Mail Receipt:** A required attempt was made to contact John P. Ley at all known addresses in Camas and Vancouver via a letter and a USPS certified mail receipt. See attached exhibits 01-03.
- (B) **Search Local Telephone Directories:** A search on the website <https://www.searchpeoplefree.com/> and google indicates that John P. Ley has a current mailing address at 444 NW Fremont St. Multiple numbers for him are listed. See attached exhibits 04.
 - (a) 360-254-6225 - Camas
 - (b) 360-834-2672 - Camas
 - (c) 503-254-6225 - Camas
- (C) **GIS Property Tax Records:** John P. Ley owns the property at 444 NW Fremont Street, Camas WA in Clark County. See attached exhibits 05.
- (D) **Statewide Voter Registration Database Search (VRDB):** John P. Ley, the above-listed voter, is identified as living at residential address 8500 NE Hazel Dell Ave Apt H4. Research (below) supports that this is not his **permanent** address and he does not reside at the VRDB residential address as currently listed in his voter registration.
- (E) **Other State Voter Registration Database Search:** John P. Ley was not found in Oregon, North Carolina, or Fulton County Georgia.

Declaration:

RCW 29A.04.151 - Residence. (<https://app.leg.wa.gov/RCW/default.aspx?cite=29A.04.151>)

"Residence" for the purpose of registering and voting means a person's **permanent** address where he or she physically resides and maintains his or her abode. However, no person gains residence by reason of his or her presence or loses his or her residence by reason of his or her absence:

- (1) While employed in the civil or military service of the state or of the United States;
- (2) While engaged in the navigation of the waters of this state or the United States or the high seas;
- (3) While a student at any institution of learning;
- (4) While confined in any public prison.

Absence from the state on business shall not affect the question of residence of any person unless the right to vote has been claimed or exercised elsewhere.

John P. Ley owns the property at 444 NW FREMONT ST, CAMAS, WA 98607 (See attached exhibits 05). He purchased the property in 2000 and has maintained a permanent presence there for almost two decades. It is currently valued at \$1.4 million + and has 180 degree views of the Columbia River Gorge.

- 1) According to PDC reports, in 2024, John P. Ley made two donations to the Clark County Republican Central Committee declaring his address as 444 NW Fremont St. after filing to run for office in the 18th LD. (See attached exhibits 06)
- 2) John P. Ley has run for office using this address in 2014, 2018, and 2020 (* Redistricting in 2022 changed 444 Fremont St. to the 17th LD) (See attached exhibits 07)
- 3) John P. Ley has voted regularly from 444 Fremont St. dozens of times since 2006.
- 4) I have visited 444 Fremont St. several times and have seen different cars in the driveway and cars in different locations on the property. There have been package deliveries on the front porch. There are current political signs in the yard.
- 5) In the 2020, 2022, and 2024 Financial Affairs Disclosures, John P. Ley declares two businesses at the 444 Fremont St. address and the residence at 444 Fremont St (See attached exhibits 08)

In 2022, while maintaining his permanent residence in the 17th LD, John P. Ley temporarily changed his voter registration to a "rented" room of a friend in Battle Ground for \$1 without any leasing documents or payment receipts and filed to run in the 18th using this address. Republican Carolyn Crain filed a voter challenge on the grounds that John P. Ley did not live at the address. The subsequent hearing upheld Crain's challenge, and charges were filed against John P. Ley.

According to an article in the Columbian

(<https://www.columbian.com/news/2023/nov/19/former-legislative-candidate-john-ley-faces-felony-fraud-charges-in-2022-election-case/>)

A probable cause statement signed by sheriff's Sgt. Jayson Camp shows phone records for Ley were analyzed during the investigation. According to the statement, phone records for April 1 through May 17 showed, "John Ley's cellphone was active near (his) residence in Camas, Washington, nearly every day."

In the statement, Camp said he inspected the records for any activity near the Battle Ground address and found no evidence that Ley's cellphone was ever located near the home during the entire date range.

*"I determined it was highly unlikely that John Ley had ever stayed the night in that location during that time frame, and ultimately, I **determined beyond a reasonable doubt** that John Ley did not live or reside at that address during that time," Camp wrote.*

Camp also said in the probable cause statement that it was "unlikely that John Ley had ever actually even been to the Battle Ground address between the time he claimed to have entered into a rental agreement and the date he filed his declaration of candidacy."(See attached exhibits 09)

Still in 2022, prior to the hearing, John P. Ley again temporarily switched his voter registration; this time to an apartment in Hazel Dell while maintaining his permanent residence in the 17th LD.

In 2024, while maintaining his permanent residence in the 17th LD, John P. Ley yet again changed his voter registration address to 8500 NE Hazel Dell Ave Apt H4. Also in 2024, he filed to run for office in the 18th LD, and once more, Republican Carolyn Crain filed a voter challenge on the grounds that John P. Ley does not live at this address. According to her voter challenge a private investigator was hired and "who has not reported any results at the Hazel Dell location in a month"(See attached exhibits 10). I too have visited 8500 NE Hazel Dell Ave Apt H4 and seen no evidence of occupation.

- None of the cars seen at his permanent residence in Camas have been seen in the parking lot.
- The apartment appears to be unfurnished.
- Unlike most other occupied apartments, there is nothing on the balcony.
- Mail and flyers remain on the door for weeks and weeks.
- The USPS certified letter sent to this address was undeliverable at the door. Instead it was picked up at the post office.
- According to records searches, there is no phone line to the apartment

It's clear and convincing that John P. Ley's **permanent** address, throughout all this and for two decades prior to this, is 444 Fremont St. in Camas. Based on the activity, signing for the registered mail at 444 Fremont St., the pattern of "address shopping" and the reasonable nature that he would reside at a beautiful home in Camas rather than an apartment also makes it highly probable.

This voter meets the requirements for a successful voter challenge under RCW 29A.08.810. It is therefore respectfully requested that the voter be removed forthwith from the voter roll, or the government show good cause in writing why this particular voter may not be so removed from the roll.

Respectfully submitted,
Geoffrey Munson Vancouver, WA

2024 Voter Challenge - John P. Ley Exhibits

Exhibit 01



Tracking Number:

9589071052701978683070

Copy Add to Informed Delivery

Latest Update

Your item was picked up at the post office at 1:47 pm on August 26, 2024 in VANCOUVER, WA 98661.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Individual Picked Up at Post Office
VANCOUVER, WA 98661
August 26, 2024, 1:47 pm

Available for Pickup

VANCOUVER
2700 CAPLES AVE
VANCOUVER WA 98661-6100
M-F 0900-1730; SAT 0900-1400
August 21, 2024, 6:16 pm

Notice Left (No Authorized Recipient Available)

VANCOUVER, WA 98665
August 21, 2024, 1:45 pm

In Transit to Next Facility

August 20, 2024

Arrived at USPS Facility

PORTLAND, OR 97215
August 19, 2024, 9:21 pm

USPS in possession of item

VANCOUVER, WA 98665
August 19, 2024, 1:40 pm

Hide Tracking History

Exhibit 02

9589 0710 5270 1978 6624 02

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com™.

Certified Mail Fee	4.85	
Extra Services & Fees (check box, add fee if applicable)	4.10	
<input checked="" type="checkbox"/> Return Receipt (hardcopy)	\$	
<input type="checkbox"/> Return Receipt (electronic)	\$	
<input checked="" type="checkbox"/> Certified Mail Restricted Delivery	\$	
<input type="checkbox"/> Adult Signature Required	\$	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$	
Postage	.73	
Total Postage and Fees	9.68	
Sent To	John Ley	
Street and Apt. No., or PO Box No.	444 NW Fremont St.	
City, State, ZIP+4®	Camas, WA 98607	

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

Tracking Number:

9589071052701978662402

Copy Add to Informed Delivery

Latest Update

Your item was delivered to an individual at the address at 12:36 pm on August 19, 2024 in CAMAS, WA 98607.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

CAMAS, WA 98607
August 19, 2024, 12:36 pm

In Transit to Next Facility

August 18, 2024

Arrived at USPS Facility

PORTLAND, OR 97215
August 17, 2024, 9:37 pm

USPS in possession of item

VANCOUVER, WA 98685
August 17, 2024, 1:39 pm

[Hide Tracking History](#)

Exhibit 03

9589 0710 5270 1978 6622 80

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®

Certified Mail Fee	\$ 4.85	Postmark	VANCOUVER WA 98665 7 2024
Extra Services & Fees (check box, add fee)	\$ 4.10		
<input type="checkbox"/> Return Receipt (hardcopy)	\$		
<input type="checkbox"/> Return Receipt (electronic)	\$		
<input type="checkbox"/> Certified Mail Restricted Delivery	\$		
<input type="checkbox"/> Adult Signature Required	\$		
<input type="checkbox"/> Adult Signature Restricted Delivery	\$		
Postage	\$ 1.73		
Total Postage and Fees	\$ 9.68		
Sent To	John Key		
Street and Apt. No., or PO Box No.	8415 NE Hazel Dell Ave Apt. 21		
City, State, ZIP+4®	Vancouver, WA 98665		

PS Form 3800, January 2023 PSN 750902-000-9047 See Reverse for instructions

Tracking Number:

9589071052701978662280

 Copy  Add to Informed Delivery

Latest Update

Your item was returned to the sender on August 19, 2024 at 1:44 pm in VANCOUVER, WA 98665 because the address was vacant or the business was no longer operating at the location and no further information was available.

Get More Out of USPS Tracking:

 USPS Tracking Plus®

Alert

Vacant

VANCOUVER, WA 98665
August 19, 2024, 1:44 pm

In Transit to Next Facility

August 18, 2024

[See All Tracking History](#)

[What Do USPS Tracking Statuses Mean?](#)

Exhibit 04

John Patrick Ley in Vancouver, WA also Johnjeff Ley

Home address, vacation, business, rental and apartment property addresses for John

8500 NE Hazel Dell Ave, APT H4, Vancouver, WA 98665 - 1913 Stephens St, Goldsboro, NC 27530

Current

444 NW Fremont St, Camas, WA 98607

16728 NE Halsey St, Portland, OR 97230

3141 NE 38th Ave, Portland, OR 97212

Home telephone number and mobile/wireless/cell phone numbers for John

(360) 254-6225 -Current

(360) 834-2672

(503) 254-6225

(206) 254-6225

Spouse, partner, mother, father, sister, brother and ex-spouse/partner for John

Jeffery W Ley

Patricia M Ley

Richard W Ley

Deborah Gail Vanderberg

Lisa A Plasencia

Friends, family, business associates and current/previous roommates for John

Meredith Ann Honeycutt

Teresa L Headley

Zachariah John Berning

More Free Details ⇒



Nuwber

<https://nuwber.com> > ... > 444 NW Fremont St

John P Ley from Camas, WA - 444 NW Fremont St

Name: John P Ley, Phone number: **(360) 254-6225**, State: WA, City: Camas, Zip Code: 98607 and more information.



Whitepages

<https://www.whitepages.com> > ... > WA > Camas

John P Ley 444 NW Fremont St, Camas, WA 98607

John P Ley, age 69, lives in Camas, WA. Find their contact information including current home address, phone number **360-254-6225**, background check reports, ...

Who owns the Phone Number

(360) 834-2672 LOW SPAM RISK

Landline Last updated Feb 2024

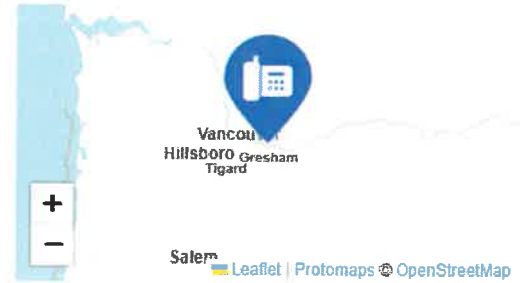
John P Ley

John Patrick Ley

60s

Monitor

View Cell Phone Numbers



444 NW Fremont St, Camas, WA

Phone owner's address

Directions

Who owns the Phone Number

(503) 254-6225 LOW SPAM RISK

Landline Last updated Feb 2024

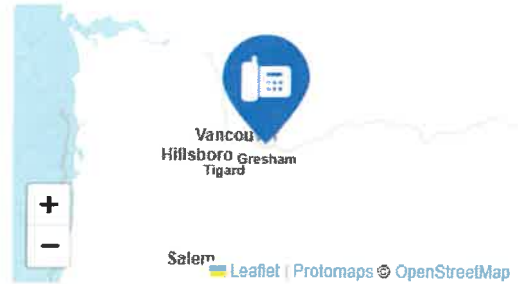
John P Ley

John Patrick Ley

60s

Monitor

View Cell Phone Numbers



444 NW Fremont St, Camas, WA

Phone owner's address

Directions

Who owns the Phone Number

(206) 254-6225 LOW SPAM RISK

Landline Last updated Feb 2024

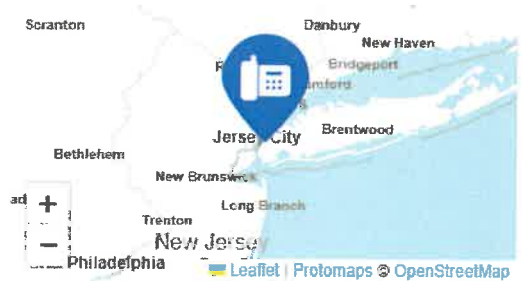
Nevan F Scott

Nevan Forbes Scott

30s

Monitor

View Cell Phone Numbers



66 Rockwell Pl Apt 23D, Brooklyn, NY

Phone owner's address

Directions

Exhibit 05

PROPERTY INFORMATION CENTER

Account Summary

[Help Videos & Documents](#)

[Print Friendly](#)

Property Identification Number: 82990584 [MapsOnline](#) [Fact Sheet](#)

Property Type: Real

Property Status: Active

Site Address: 444 NW FREMONT ST, CAMAS, WA 98607 ([Situs Addresses](#))

Abbreviated Description: THE RIDGE LOT 11 SUB 92

Tax Status: Regular

[Info for Senior/Disabled Property Tax Exemption](#)

[Account](#) [Building](#) [Environmental](#) [Taxes](#) [Auditor Docs](#) [Misc Documents](#) [Permits](#) [Sales Search](#)

Property Owner LEY JOHN		Owner Mailing Address 444 NW FREMONT ST CAMAS WA , 98607 US		Property Site Address 444 NW FREMONT ST, CAMAS, WA 98607 Google Maps Street View	
Administrative Data Info...		Electoral Data		Assessment Data Info...	
Jurisdiction	Camas	Board of County Councilors District	4	2024 Uncertified Values	
Land Use Planning		Camas Council Ward	3	Market Value	
Comprehensive Plan Designation	SFL	CPU Commissioner District	2	Land Value	\$338,250.00
Comprehensive Plan Overlay(s)	none	Election Precinct	965	Building Value	\$1,067,545.00
Urban Growth Area	Camas	Legislative District	17	Total Property	\$1,405,795.00
Zoning Designation - Codes	Residential-15,000 (R-15)	Library District	Camas Public Library	Taxable Value Info...	
Zoning Overlay(s)	none	Port District	Camas Port District 2	Total	\$1,405,795.00
Miscellaneous		School District Board Director District	Director District 2	2023 Values for 2024 Taxes	
Census Tract	414.00	Sewer Board District	Camas	Market Value as of January 1, 2023	
Drainage District	n/a	State Weed Board District	2	Land Value	\$357,750.00
Neighborhood	n/a	Land Data		Building Value	\$1,171,404.00
Park District	n/a	Approximate Area Info...	16,785 sq. ft. 0.39 acres	Total Property	\$1,529,154.00
Public Safety		Clark County Road Atlas	Page 2	Taxable Value Info...	
Burning Allowed	No	DOR Land Use Code	11	Total	\$1,529,154.00
EMS Response Area	Camas Washougal Fire	Info...		2022 Values for 2023 Taxes	
Fire District	Camas	Section-Township-Range	SE	Market Value as of January 1, 2022	
Increased Wildfire			1/4.509.T1N.R.31	Land Value	\$344,100.00

Exhibit 06

9/4/24, 9:50 AM



711 Capitol Way Suite 206
 PO Box 40908 Olympia, WA 98504-0908
 (360) 753-1111
 Toll Free 1-800-601-2828

public

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

Clark County Republican Central Committee Non-Exempt

Deposit date: 07/01/2024

PO Box 205

Report number: 110227662

Vancouver, WA 98666

Submitted date: 07/08/2024

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
	a. Anonymous	\$0.00	\$0.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)	\$0.00	\$0.00
	c. Loans, notes, security agreements (Schedule L)	\$0.00	
	d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
	e. Small contributions	\$0.00	

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$3,559.20

Corresponds to amount on line 1, Schedule A to C4, and itemized below

3. ITEMIZED CONTRIBUTIONS

Date received	Contributor (Name and address)	Employer and address	Amount	Aggregate total
07/01/2024	Van Eynde Phil 13201 NE 61st Ave , Vancouver, WA 98685	Occupation: RETIRED	\$125.00	N \$345.00
07/01/2024	Rogie Rebecca 9808 NE 94th Ave , Vancouver, WA 98662	John I Scott Vancouver WA Occupation: BROKER	\$300.00	N \$300.00
07/01/2024	Robin John 2302 NE 154th Circle , Vancouver, WA 98686	Tetra Pak Vancouver WA Occupation: Maintenance Supervisor	\$387.48	N \$387.48
07/01/2024	Closson Kevin 12109 NW 42nd Ave , Vancouver, WA 98685	Amazon Vancouver WA Occupation: SOFTWARE ENGINEER	\$258.41	N \$258.41
07/01/2024	LEY JOHN 444 NW Fremont St , Camas, WA 98607	retired Occupation: Retired	\$250.00	N \$290.00



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

public
**CASH RECEIPTS MONETARY
CONTRIBUTIONS**

C3

Clark County Republican Central Committee Non-Exempt

Deposit date: 07/22/2024

PO Box 205
Vancouver, WA 98666

Report number: 110233249

Submitted date: 07/29/2024

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received	Amount	Total
a. Anonymous	\$0.00	\$0.00
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)	\$0.00	\$0.00
c. Loans, notes, security agreements (Schedule L)	\$0.00	
d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
e. Small contributions (27 persons giving)	\$1,481.12	

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$55,718.73

Corresponds to amount on line 1, Schedule A to CA, and itemized below

3. ITEMIZED CONTRIBUTIONS

Date received	Contributor (Name and address)	Employer and address	Amount	Aggregate total
07/13/2024	Anderson Jon 8009 NW 11th Ct , Vancouver, WA 98665	Retired Occupation: RETIRED	\$50.00	N \$820.00
07/14/2024	Dean William 9513 NE 12th Pl , Vancouver, WA 98664		\$25.00	N \$195.00
07/15/2024	O'NEILL JACKIE 37202 NE 216th Ave , Yacolt, WA 98675		\$10.00	N \$235.00
07/15/2024	Conway Rebecca 2420 185th Ave E , Lake Tapps, WA 98391	Retired Occupation: RETIRED	\$50.00	N \$408.41
07/15/2024	Koch Nola 9909 NE 103rd Cir , Vancouver, WA 98662		\$20.00	N \$249.36
07/15/2024	Kulla Darlene 10505 NE 331st , La Center, WA 98629	Camp Hope Battle Ground WA Occupation: PROGRAM ASSISTANT	\$150.00	N \$1,588.00
07/15/2024	Boyes Donna PO Box 433 , N. Bonneville, WA 98648	Silver Star Industries N. Bonneville WA Occupation: ASSISTANT ADMINISTRATOR	\$50.00	N \$408.41
07/15/2024	McHugh Richard 3016 NE 154th Ave , Vancouver, WA 98682	Retired Occupation: Retired	\$125.00	N \$383.41

9/4/24, 9:51 AM

public

Date received	Contributor (Name and address)	Employer and address	Amount	Aggregate total
07/15/2024	Tucker Bertha 10506 NW 33rd Ave , Vancouver, WA 98665	Retired Vancouver WA Occupation: RETIRED	\$20.00	N \$310.00
07/15/2024	Ware Paul PO Box 55817 , Portland, OR 97238	Occupation: SELF EMPLOYED	\$50.00	N \$363.41
07/15/2024	Robin John 2302 NE 154th Circle , Vancouver, WA 98686	Tetra Pak Vancouver WA Occupation: Maintenance Supervisor	\$25.00	N \$512.48
07/15/2024	Wubben Nicole 4800 NW 175th Way , Ridgefield, WA 98642	Self Ridgefield WA Occupation: REAL ESTATE INVESTOR	\$50.00	N \$1,623.41
07/15/2024	Wubben Nicole 4800 NW 175th Way , Ridgefield, WA 98642	Self Ridgefield WA Occupation: REAL ESTATE INVESTOR	\$450.00	N \$1,623.41
07/15/2024	Stupak Mike 4113 NE Tacoma Ct , Camas, WA 98607		\$51.93	N \$346.93
07/15/2024	Reed Trianna 491 Mathews Rd , Washougal, WA 98671	Pacific Northwest Business Services, LLC Washougal WA Occupation: President	\$10.00	N \$360.00
07/15/2024	curry James 5317 NE 101st St , Vancouver, WA 98686	Retired Occupation: Retired	\$100.00	N \$600.00
07/15/2024	Meuchel Connie 29612 NW 51st Ave , Ridgefield, WA 98642	Retired Occupation: RETIRED	\$110.00	N \$610.00
07/15/2024	LEY JOHN 444 NW Fremont St , Camas, WA 98607	retired Occupation: Retired	\$50.00	N \$340.00
07/15/2024	Horn Maureen 16402 NE 74th Cir , Vancouver, WA 98682	Retired Occupation: RETIRED	\$20.00	N \$358.41

- a) <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110227662>
- b) <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/11023324>

Exhibit 07

https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates?filer_name=John+Ley&office=STATE+REPRESENTATIVE%7CSTATE+SENATOR




 JOHN P LEY (JOHN LEY)	2018	LEG DISTRICT 18 - HOUSE	STATE REPRESENTATIVE
 JOHN P LEY	2014	LEG DISTRICT 18 - HOUSE	STATE REPRESENTATIVE
 JOHN P LEY (John Ley)	2020	LEG DISTRICT 18 - SENATE	STATE SENATOR

Exhibit 08

- a) 2024: <https://apollo.pdc.wa.gov/public/financial-affairs/statement/121920>
- b) 2022: <https://apollo.pdc.wa.gov/public/financial-affairs/statement/107770>
- c) 2020: <https://apollo.pdc.wa.gov/public/financial-affairs/statement/92963>

Business associations

Business entities where John P Ley owns 10 percent or more, or serves as an officer, director or general partner.

NW Safe Retirements, LLC (JOHN P LEY)

444 NW Fremont St.

Camas WA 98607

limited liability corporation

100% ownership

Government Payments

No payments were received by NW Safe Retirements, LLC from a government agency where John P Ley sought or held office.

Other Government Payments

No payments were received by NW Safe Retirements, LLC in excess of \$12,000 from a government agency where John P Ley **did not** seek or hold office.

Business Payments

No payments were received by NW Safe Retirements, LLC in excess of \$12,000 from any business customer.

Safe Haven Assets, LLC (JOHN P LEY)

444 NW Fremont St.

Camas WA 98607

IRA owned LLC

100% ownership

Government Payments

No payments were received by Safe Haven Assets, LLC from a government agency where John P Ley sought or held office.

Other Government Payments

No payments were received by Safe Haven Assets, LLC in excess of \$12,000 from a government agency where John P Ley **did not** seek or hold office.

Business Payments

No payments were received by Safe Haven Assets, LLC in excess of \$12,000 from any business customer.

Real estate

Real estate owned in the state of Washington:

444 NW Fremont St.

Camas, WA 98607

Owned by: JOHN P LEY

Assessed value: more than \$1,000,000.00

Exhibit 09

<https://www.columbian.com/news/2023/nov/19/former-legislative-candidate-john-ley-faces-felony-fraud-charges-in-2022-election-case/>

[Home](#) / [Events](#) / [Clark County Police](#)

Former legislative candidate John Ley faces felony fraud charges in 2022 election case

Camas resident to appear in court on Nov. 28

By [Shen Phai](#), Columbian staff writer

Published: November 19, 2023 2:23pm

Share:      



John Ley (The Columbian files)

[Listen to this Article](#)

Former legislative candidate John Ley of Camas is facing felony elections fraud charges after claiming he lived in Battle Ground and Hazel Dell, according to court filings.

Ley, who made those claims in 2022 during an unsuccessful bid to run in the 18th Legislative District, was ordered to appear before Superior Court Judge David Gregerson on Nov. 28 to respond to allegations of providing false information for voter registration and providing false information on a declaration of candidacy.

The prosecuting attorney's office filed the allegations on Nov. 1 following an investigation by the Clark County Sheriff's Office. They are considered Class C felonies, punishable by a maximum fine of \$10,000 or five years in jail.

Ley, a Republican, filed to run for the 18th Legislative District Position 2 seat. Approximately one month before filing, Ley changed the address on his voter registration from his Fremont Street home in Camas, which is in the 17th District, to a Battle Ground address in the 18th District.



Ley was found to be ineligible for the office following a [voter registration challenge](#) filed by Vancouver resident Carolyn Crain.

At a hearing on the challenge, Ley said he didn't live in Battle Ground in a traditional sense but was renting a room in a home owned by friends Philip and Eileen Haggerty. Ley said he was paying \$1 per month and was free to stay there whenever he wanted.

County Auditor Greg Kimsey [issued a ruling](#) on the challenge in July 2022, stating there was "clear and compelling" evidence in support of Crain's challenge, and that Ley "did not state, or otherwise provide evidence, that he resides at the Battle Ground location."

Prior to the hearing, Ley changed the address on his voter registration again — this time to an apartment on Hazel Dell Avenue, which is also in the 18th District.

Public records show that address is currently listed on Ley's voter registration. Kimsey confirmed a ballot for the Nov. 8 general election was sent to Ley at the Hazel Dell Avenue address, and that ballot was received and processed.

Kimsey turned the matter over to the sheriff's office to investigate, with any decision to pursue charges made by the prosecuting attorney's office.

A probable cause statement signed by sheriff's Sgt. Jayson Camp shows phone records for Ley were analyzed during the investigation. According to the statement, phone records for April 1 through May 17 showed, "John Ley's cellphone was active near (his) residence in Camas, Washington, nearly every day."

In the statement, Camp said he inspected the records for any activity near the Battle Ground address and found no evidence that Ley's cellphone was ever located near the home during the entire date range.

"I determined it was highly unlikely that John Ley had ever stayed the night in that location during that time frame, and ultimately, I determined beyond a reasonable doubt that John Ley did not live or reside at that address during that time," Camp wrote.

Camp also said in the probable cause statement that it was "unlikely that John Ley had ever actually even been to the Battle Ground address between the time he claimed to have entered into a rental agreement and the date he filed his declaration of candidacy."

One issue the court will have to decide is whether Ley knowingly lied when he changed his voter registration and filed to run for office.

"As a result of my investigation, I do not believe John Ley intentionally lied; rather, he negligently and recklessly perjured himself by attempting to create a loophole in order to run for an office for which he was not legally eligible under Washington state law," Camp wrote.

Ley could not be reached for comment.

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Exhibit 010

<https://clark.wa.gov/sites/default/files/media/document/2024-07/john-ley-voter-registration-challenge-affidavit-and-supporting-documents.pdf>

Washington State Voter Registration Challenge Form JUL 25 2024

1 Personal Information of Challenger

Last Name: Crain First Name: Carolyn Middle Initial: I Suffix: _____
 Residential Address in Washington State: 5417 NE 17th St
 City: Yanover State: WA ZIP: 98161
 Phone Number: 503-981-5659 Email Address: hazel-x2@comcast.net

2 Personal Information of Challenged

Last Name: Jay First Name: John Middle Initial: _____ Suffix: _____
 Residential Address in Washington State: 8415 NE Hazel Dell Ave
 City: Yanover State: WA ZIP: 98165
 Phone Number: 360-254-6225 Email Address: Elect-johnjay@gmail.com

3 Basis of Challenge (provide evidence to support your challenge)

The challenged voter:

- is not a US citizen
- will not be at least 18 years old by the next election
- is convicted of a felony in Washington and serving a sentence of total confinement under the jurisdiction of the Department of Corrections, or a felony conviction in another state's court or federal court and voting rights have not been restored under RCW 29A.08.520
- has been judicially declared ineligible to vote due to mental incompetency under RCW 29A.08.515
- does not reside at the address listed on their voter registration and is not subject to RCW 29A.04.151 or RCW 29A.08.112

Provide voter's actual residential address if known:
 Residential Address: 444 NW Fremont St. City: Camas State: WA ZIP: 98607

4 Oath

I, Carolyn Crain, declare under penalty of perjury under the laws of the State of Washington that I:

- am a registered voter in the State of Washington;
- have personal knowledge and belief that the person named above is not qualified to vote for the reason or reasons indicated in this affidavit;
- have exercised due diligence to personally verify the evidence that accompanies this affidavit;
- believe that the challenged voter is not qualified to vote or does not live at the address listed on their voter registration.

Sign here: Carolyn Crain Date here: 7/18/2024

Washington State Voter Registration Challenge Form

1 Personal Information of Challenger

Last: Bowman First: Shane Middle: Alan Suffix: _____
 Residential address in Washington state: 1604 NW 1st Ave
 City: Battle Ground State: WA ZIP: 98604 Apt #: _____
 Phone number: 360-921-2783 Email address: WSFE@Comcast.net

2 Personal Information of Challengee

Last: Key First: Jahn Middle: _____ Suffix: _____
 Residential address in Washington state: 8415 NE Hazel Dell Ave. Apt. 21
 City: Vancouver State: WA ZIP: 98665 Apt #: _____
 Phone number: 360-254-6225 Email address: ElectJahnkey@gmail.com

3 Basis of Challenge (provide evidence to support your challenge)

- The challenged voter:
- is not a US citizen
 - will not be at least 18 years old by the next election
 - is convicted of a felony in Washington and serving a sentence of total confinement under the jurisdiction of the Department of Corrections, or a felony conviction in another state's court or federal court and voting rights have not been restored under RCW 29A.08.520
 - has been judicially declared ineligible to vote due to mental incompetency under RCW 29A.08.515
 - does not reside at the address listed on their voter registration and is not subject to RCW 29A.04.151 or RCW 29A.08.112

Provide voter's actual residential address if known:
444 NW Fremont St. Camas WA 98607
 residential address city, state ZIP

4 Oath

I, Shane Bowman, declare under penalty of perjury under the laws of the State of Washington that I:

- am a registered voter in the State of Washington;
- have personal knowledge and belief that the person named above is not qualified to vote for the reason or reasons indicated in this affidavit;
- have exercised due diligence to personally verify the evidence that accompanies this affidavit;
- believe that the challenged voter is not qualified to vote or does not live at the address listed on their voter registration.

sign here: Shane B date here: 7/18/24

For official use: _____

Declaration:

In 2022 I filed a voter challenge on the grounds that John Ley didn't live at the address he filed to run for office from. A hearing on the issue was found to concur with my filing.

Afterwards I filed in our county Superior Court to have John's name removed from the ballot. Due to the ballots being mailed already the judge determined that removing of the "candidates name" was going to confound the elections and disenfranchise thousands of voters. The ballots were already in the mail. The judge ordered that the county auditor would send notifications to all addresses on file which had a registered voter that the votes cast for John Ley would not be counted towards advancement in the primary to be on the general election ballot.

John Ley at that time had already switched his voter registration address to a Vancouver Housing Authority property address. He has claimed that address on his voter registration ever since and even voted from that address while continuing to reside in his million+ dollar home in Camas a residence in the 17th LD.

I had stopped by there a couple of times back in March and April of this year but there was no answer at the door. Address of registration : 8415 NE Hazel Dell Ave, Apt 21, Vancouver, WA 98665 visited on March 1st and April 20th 2024.

I do not believe he lives there. His property in Camas is still in his name as owner at 444 NW Fremont St, Camas, WA 98607. It is currently valued at \$1,405,795.00 Property ID Number is 82990584 Desc: THE RIDGE LOT 11 SUB 92

According to MAPS it is a 24 minute commute time of 16.6 miles which means it does not qualify for an IRS mileage tax exemption even.

Property Identification Number: 82990584 [MapsOnline](#) [Fact Sheet](#)
Property Type: Real
Property Status: Active
Site Address: 444 NW FREMONT ST, CAMAS, WA 98607 (Situs Addresses)
Abbreviated Description: THE RIDGE LOT 11 SUB 92
Tax Status: Regular

[Info for Senior/Disabled Property Tax Exemption](#)

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