Brad Erhart
[redacted]
Vancouver, WA 98683

August 28, 2025

City Manager & City Council
415 W 6th St
Vancouver, WA 98660

Subject: Formal Code of Ethics Complaint Against Kim Harless (Position 1)

Dear Members of the Vancouver City Council & City Manager:

Pursuant to the *City of Vancouver Policy 100-36 (City Council Code of Ethics and Conduct), Section 9.0*, I am writing to submit a formal complaint regarding violations of the *Code of Ethics* and *Washington State Law (RCW 42.23)* by Councilmember Kim Harless ("Harless").

I became personally aware of and knowledgeable about the violations detailed below beginning on August 6, 2025. This complaint is based substantially upon my personal knowledge.

This complaint details a significant conflict of interest involving Harless, in her capacity as a City Councilmember and Chair of the City of Vancouver Lodging & Tax Authority Committee ("LTAC"), and Mr. John Park ("Park"), the governor of Vancouver Arena and an applicant for City grants.

I. Summary of Violations

It has been discovered that in 2023, and continuing through 2025, Harless has maintained a romantic relationship with Park. There is further evidence suggesting this relationship existed in years prior as well. During this same period (2023, 2024, and 2025), Park applied for and received LTAC grants on behalf of Vancouver Arena for an event known as GoFest. Park is listed as the governor for Vancouver Arena in the organization's articles of incorporation and annual reports.

As Chair of LTAC and a member of the City Council, Harless participated in the review, deliberation, and approval processes for these grants without disclosing her relationship with Park and without recusing herself from the proceedings.

II. Relevant Policies and Laws Violated

Harless's actions violate the following sections of the *City of Vancouver Policy 100-36* and *Washington State Law*:

A. *City of Vancouver Policy 100-36, Section 6.0(B): Personal Influence in Contract Selection Prohibited*.

> No Councilmember shall influence the City's selection of, or its conduct of business with, a corporation, person, or firm having or proposing to do business with the City if the Councilmember has a personal financial interest, direct or indirect in or with the corporation, person, or firm, unless such interest is a remote interest as defined in RCW 42.23.040 and summarized herein and where the fact and extent of such interest is disclosed and noted in the official minutes or similar records of the City prior to formation of the contract and thereafter the City Council authorizes, approves, or ratifies the contract in good faith by a vote of its membership sufficient for the purpose without counting the vote or votes of the Councilmember(s) having the remote interest.

B. *City of Vancouver Policy 100-36, Section 6.0(A): Personal Interests in Contracts Prohibited*.

> No Councilmember shall participate in their capacity as a councilmember in the making of a contract in which the Councilmember has a personal interest, direct or indirect, or performs in regard to such a contract some function requiring the exercise of discretion on behalf of the City.

C. *RCW 42.23.030: Interest in contracts prohibited—Exceptions*.

> No municipal officer shall be beneficially interested, directly or indirectly, in any contract which may be made by, through or under the supervision of such officer, in whole or in part... A municipal officer may not vote in the authorization, approval, or ratification of a contract in which he or she is beneficially interested... The interest of the municipal officer must be disclosed to the governing body... before the formation of the contract.

A significant personal or romantic relationship, particularly one with evidence suggesting cohabitation (see *Section III.A*), constitutes a direct or indirect beneficial interest in contracts awarded to the partner. This relationship does not qualify as a "remote interest" as defined in *RCW 42.23.040*.

D. *City of Vancouver Policy 100-36, Section 5.0: Avoidance of the Appearance of Impropriety*.

The failure to disclose this relationship while presiding over and voting on grants for Park creates a clear appearance of impropriety.

III. Factual Basis for Complaint

The violations stem from Harless's failure to disclose her relationship with Park and her subsequent participation in decisions benefiting Park's organization, and her own personal interests, during the 2023, 2024, and 2025 grant cycles.

A. Evidence of Relationship and Potential Shared Residence

The following evidence establishes the existence of a relationship constituting a conflict of interest:

- Information obtained from data broker websites that strongly indicate a shared residence between Harless and Park beginning in 2022.
- An Archive.org copy of a photo posted on the Vancouver Arena website showing Park and Harless in a manner that strongly reflects a romantic relationship, taken on May 7, 2023 (includes original full-sized photo with metadata intact).
- A snapshot from Facebook showing a picture of Harless's conversation with Park while referring to him as "honey" from February 2024.
- Snapshots of the postings to the Vancouver Arena Facebook Group showing Harless and Park together at Vancouver Arena events in June and July 2024.
- An Archive.org snapshot of Harless's Bluesky account showing messages exchanged between her and Park in November 2024.
- A photo of Harless and Park together in April 2025, at a Star Trek meetup.
- An Archive.org snapshot of the Vancouver Downtown Association website, and snapshots of their Facebook postings from June 28, 2025, showing what appears to be Harless cosplaying alongside Park at the LTAC grant event.
- An Archive.org copy of Harless's campaign website from August 2025, including a photo showing her arm around Park and strongly reflecting a romantic relationship (including original full-sized photo).
- A snapshot from Harless's Facebook account showing her relationship with Park dated August 6, 2025.
- A snapshot of Harless's postings to the Vancouver Arena Facebook Group dating back to May 2018.

B. Evidence of Political and Financial Connections

- Washington State Public Disclosure Commission (PDC) documents showing campaign donations made by Park to Harless in 2021 and 2025.
- Snapshots and Archive.org copies of Harless's campaign website and Facebook account showing Park holding campaign material and endorsing Harless (July 15, 2021, and October 17, 2021).
- Snapshots of Harless's campaign account on Facebook and Instagram showing Park assisting in multiple campaign activities and appearing in campaign material for Harless (May – August 2025).

C. Failure to Disclose Conflict and Failure to Recuse

Despite the established relationship, Harless failed to disclose the conflict of interest during LTAC and City Council meetings where Vancouver Arena grants were discussed and approved. This is supported by:

- Copies of all relevant LTAC meeting agendas and notes, as well as video recordings of the meetings, showing that Harless did not disclose the conflict and recuse herself as required.
- Copies of all relevant City Council meeting notes, agendas, related documents and resolutions, show that Harless did not disclose the conflict and recuse herself as required.

D. Specific Incident: October 9, 2024

On October 9, 2024, there was a presentation (believed to be presented by Chris Harder) specifically regarding conflict of interest, while Park's grant for that year was in the process of review. Other individuals recused themselves due to their own conflicts, but Harless did not. Subsequently, at the following LTAC meeting, Park was present for a presentation and neither disclosed their relationship.

IV. Acquisition of Knowledge

I acquired this knowledge while researching candidates for the primary election for the City Council Seat 1 position after receiving campaign flyers and my mail-in ballot. Dealing with issues involving City Construction Services that were impacting my community, I wanted to learn more about Harless's work and campaign promises.

As I came across her Facebook profile during my research on August 6, 2025, her profile showed that she was in a relationship with Park. Wanting to know whether the relationship could be impacting her decisions, I performed a search on Google for their names together, '"Kim Harless" "John Park."' I immediately found documents on the City's website regarding multiple grants to Vancouver Arena, listing Park as the applicant.

V. Actions Suggesting Intent to Conceal

After discovering sufficient evidence existed, I posted about this conflict on the Nextdoor website on August 6, 2025, which immediately gained substantial interest. The following day, August 7, 2025, as I continued collecting snapshots for evidence, Harless had removed her public relationship status with Park (documented via snapshot). While she was never obligated to share her relationship publicly, doing so immediately after having a conflict of interest discovered signifies an intent to try to conceal previous evidence from the public.

VI. Other Concerns

Because the relationship existed prior to these votes, there is significant concern that Harless may have disclosed or used confidential, privileged, or proprietary information gained by reason of her position as the chair of LTAC, or assisted Park in drafting the grant requests. This would violate *Policy 100-36, Section 6.0(C) (Disclosure of Confidential Information)* and *Section 6.0(G) (Improper Use of Position Prohibited)*.

VII. Conclusion

The evidence demonstrates a clear and repeated violation of the *City's Code of Ethics* and *RCW 42.23*. Harless failed to disclose a significant conflict of interest and participated in the awarding of City contracts to her personal partner.

I respectfully request that the City Council and City Manager process this complaint according to the procedures outlined in *Policy 100-36, Section 9.0*, including a prompt review by the City Attorney and subsequent referral to a Hearings Examiner for a full investigation.

All documentation and evidence cited in this complaint will be provided immediately upon request.

Sincerely,

Brad Erhart

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