



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 • Website: www.pdcc.wa.gov

November 15, 2018

Sent electronically to Vivian Queija at vivian@wholewashington.org

Subject: Whole Washington PAC, PDC Case 33370

Ms. Queija:

Below is a copy of a letter sent to Glen Morgan regarding a complaint he filed with the Public Disclosure Commission (PDC) on March 29, 2018. The complaint alleged that the Whole Washington PAC may have violated RCW 42.17A.235 and .240 for failing to timely and accurately report contribution, expenditures and debt.

Pursuant to WAC 390-37-060(1)(b), this letter is a formal written warning to the Whole Washington PAC concerning the importance of filing timely and accurate report contribution and expenditures reports, for the remainder of 2018 and for any future committee activities. The PDC will not be conducting a more formal investigation into the allegations listed in the complaint, but the PDC will consider this formal written warning if there are future PDC law or rule violations committed by the Whole Washington PAC.

Accordingly, the PDC has dismissed this complaint in accordance with RCW 42.17A.755(1)(a).

If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdcc.wa.gov.

Sincerely,

Endorsed by:

Erick Agina
PDC Compliance Officer

Peter Lavalley
PDC Executive Director



Public Disclosure Commission
Shining Light on Washington Politics Since 1972



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November 15, 2018

Sent electronically to Glen Morgan at glen@wethegoverned.com

Subject: Whole Washington PAC, PDC Case 33370

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on December 21, 2017. The complaint alleged that the Whole Washington PAC, a ballot measure committee registered with the PDC, may have violated RCW 42.17A.235 and .240 for failing to timely and accurately report contribution, expenditures and debt.

PDC staff reviewed the allegations listed in the complaint to determine whether a formal investigation or enforcement action is warranted. Staff reviewed the exhibit submitted with the complaint, the Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by the Whole Washington PAC (Committee), and the October 3, 2018 response letter received from the Committee. Based on staff's review, we found the following:

- On February 28, 2017, the Committee filed a Committee Registration (C-1pc report) indicating they were a Ballot Committee, selecting the Full Reporting Option, and listing Georgia Davenport and Vivian Queija as the campaign manager and treasurer respectively. On August 11, 2017, the Committee filed an amended C-1pc report indicating it was a Ballot Committee in support of Universal Healthcare.
- The Committee filed an amended C-1pc report on January 30, 2018, disclosing it was a ballot measure committee in support of Initiative 1600, a measure that would require the establishment of a comprehensive state program to pay for healthcare services, prescriptions, and medical equipment for Washington residents.

Allegation One: Failure to timely file C-3 and C-4 reports.

- Staff's review found that of the 160 alleged late filed C-3 and C-4 reports, 62 of the reports identified in your complaint attachment were amendments for which some of the initial C-3 and C-4 reports were filed timely or were only a few days late, and the amended information disclosed minor contribution and expenditure activities from the prior report(s).
- Staff's review further indicated that the Committee substantially complied with the filing requirements for the monthly C-4 reports for calendar year 2017 and the current filings for 2018 including the 7-Day and 21-Day Pre-General Election C-4 reports, typically filing the C-4 report on or around the required due date, and frequently early.
- The remaining alleged late filed C-3 and C-4 reports, included reports that had been timely filed and some late filed C-3 or C-4 reports disclosing minimal contribution or expenditure activities involving small dollar amounts.

- Ms. Queija stated in the response that the numerous amended reports she filed “was my diligence to ensure to correct errors as I found them in my bookkeeping. I strove to make all my initial files were correct, but as I was a new Treasurer, and a volunteer without the years of experience like other professional campaign Treasurers, I was bound to make mistakes.”
- Ms. Queija stated that she found filing the campaign finance reports using the Online Reporting of Campaign Activities (ORCA) filing software provided by the PDC to be “a challenge given reporting demands, therefore, I was forced to amend some filings. When I found mistakes, I typically contacted the PDC and self-reported to Chip or Jennifer, to ensure I learned the correct reporting procedure. By amending reports, I was not attempting to disregard laws, I was proving my respect and responsibility to document all contributions and expenditures.”

Allegation Two: Failure to timely report debt

- No evidence was provided to substantiate this allegation. Ms. Queija stated that to the best of her “knowledge, Whole Washington did not incur any debt during my tenure as Treasurer. Having read Mr. Morgan’s copious complaints, this accusation appears to be a boilerplate feature of his bot, regardless of evidence.”

Allegation Three: Failure to properly break down expenses.

- No evidence was provided to substantiate this allegation.

Pursuant to WAC 390-37-060(1)(b), the Whole Washington PAC will receive a formal written warning concerning its failure to timely report some of its contribution and expenditure reports for calendar year. The formal written warning conveys our expectation that the Whole Washington PAC will fully comply with the reporting requirements to timely file contribution and expenditure reports for the remainder of 2018, and in the future if the committee remains active. The Commission will consider this formal written warning if there are any PDC law or rule violations by Whole Washington PAC.

Based on these findings, the PDC has dismissed your complaint in accordance with RCW 42.17A.755(1)(a).

If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdc.wa.gov.

Sincerely,

Erick Agina
PDC Compliance Officer

Endorsed by:

Peter Lavellee
PDC Executive Director

cc: Whole Washington PAC