

File a Formal Complaint - Glen Morgan

[Glen Morgan](#) reported (Mon, 26 Mar at 10:20 PM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that Whole Washington PAC, its officers Georgia Davenport, Kathy Angel, Haylie McSheridan, Susan Palmer, and Treasurer Vivian Queija have habitually and willfully committed frequent and multiple violations of **RCW 42.17A**. Additionally, I have reason to believe that other violations of this chapter have occurred beyond what I have identified below.

It should be noted that Vivian Queija is the treasurer for the 43rd District Democrats, an organization that illegally dissolved in response to a complaint outlining its egregious violations of Washington State's campaign finance laws. A casual disregard for Washington State's campaign finance laws appear to be common practice for Queija.

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. It also requires that deposits be made after 5 days of receipt. Unfortunately, Whole Washington has failed on numerous occasions to do this. (See **Exhibit A "Illegally late reported C3 and C4 reports"**)

Please note I have provided this exhibit in two file formats for staff convenience

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.

Whole Washington has failed to abide by this requirement throughout their filings.

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.

Whole Washington Committee has failed to abide by this requirement.

I will point out that this political committee has cultivated a shady reputation for raising money without actually trying to fulfill the stated goals of the committee. See this article for reference:

<https://medium.com/@andrewsarn/whole-washington-announces-i-1600-9835bea06419>

The PDC should investigate the possibility that Whole Washington committed the above violations maliciously, which would be a class C felony per RCW **42.17A.750 (2)(c)**. It might be worth attempting to determine if this committee is even a real organization or if it was just created for the personal profit of the listed officers. 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

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