

April 5th, 2018

Public Disclosure Commission  
711 Capitol Way #206  
P.O. Box 40908  
Olympia, WA 98504-0908

To Whom It May Concern,

Regarding Mr. Glen Morgan's March 26<sup>th</sup> complaint against Whole Washington, we provide the following in response:

Whole Washington is a grassroots organization made up of ordinary citizen activists interested in improving Washington State through the initiative process. Our non-professional treasurer Vivian Queija had very little prior experience with Washington state campaign financial disclosure laws and did her best to comply while she learned on the go, frequently consulting with the Public Disclosure Commission to make sure she was doing things correctly. In an effort to make sure our current and past filings were as accurate as possible, we hired a professional treasurer to perform an audit. The resulting filings that Mr. Morgan claims are "illegally late" are in fact amendments to correct the record and were filed as quickly as we were able to. In the interest of transparency, we were in contact with the PDC to let them know that this was the case, so no malice or concealment exists now or in the past.

We believe our current reports are fully in compliance with the law, despite Mr. Morgan's vague assertions to the opposite.

In regard to the article Mr. Morgan cites to discredit our organization, Medium is a blogging platform, not a news organization. The self-published opinion piece was full of factual inaccuracies and written by a conspiracy theorist who appears by his online activity to work in concert with Mr. Morgan. We would advise anyone to disregard it, but it has already been removed from Medium for reasons we can only assume are related to its complete lack of substance.

The particular accusation that this organization was created to enrich its officers is completely spurious. Any cursory glance at our reports will show that not only are our officers unpaid, but that they have contributed greatly to the organization, both with their time, their energy and in funds.

We would also like to note that Mr. Morgan has filed hundreds of frivolous complaints to serve a purely partisan purpose. Disclosure laws exist to provide transparent and open elections. They should not be abused as a bludgeon to silence ordinary voices and throw wrenches into the democratic process.

We appreciate the opportunity to address these allegations and are happy to provide any additional information you may need.

Sincerely,

Whole Washington

Vivian Queija added a private note 3 hours ago (Wed, 3 Oct at 7:21 AM)  
Notified to: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov), [vivian@wholewashington.org](mailto:vivian@wholewashington.org)

Mr. Agina:

Thank you for the opportunity to comment on Mr. Morgan's allegations that I was "habitually and willful" in violating campaign finance laws. While Mr. Morgan has a panache to sensationalize the trivial, I assure you there was no willful or habitual behavior on my part to break the campaign finance laws of Washington. I regret you, and other PDC officers, must deal with the constant barrage of Mr. Morgan's complaints, which are obviously produced by his computer bot, and only lodged against any liberal groups operating in our state.

1. The charge of late filings Mr. Morgan has made are simply not true. The numerous refilings 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. I also found the ORCA software 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.
2. To my 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.
3. The link to article Mr. Morgan included in his complaint is no longer active. The author, Andrew Saturn, now running for public office in Thurston County, must have deleted the article. I rarely read Mr. Saturn's Medium posts. Given I was a partner with Mr. Ryan Whitney, in a lawsuit against Mr. Saturn in King County Superior Court, which we won, Mr. Saturn has made numerous inflammatory remarks against me and Mr. Whitney, some of which have been used by Mr. Saturn's friend, 43rd District Democrats State Committee Woman Amy Madden, to slander me and others. Mr. Saturn went so far as to file an anti-harassment complaint in Thurston County December 2017, against me, Mr. Whitney and Georgia Davenport. The judge dismissed these as obvious fabrications made by Mr. Saturn in retribution for being found guilty in our lawsuit against him in King County Superior Court.
4. As for Mr. Morgan's allegation that I have been party to "illegal behavior" due to the PAC closure of the 43rd District Democrats, this claim is false and unsubstantiated. There has been no legal ruling to warrant Mr. Morgan's claim.
5. When I became Treasurer of the 43rd, I was only given an empty check book. I asked the Chair, James Apa, multiple times to help me obtain the complete records from the former Treasurer, Elizabeth Walker. It was through my own investigations that I found the neglect of two former Treasurers and Chairs of the 43rd to file the appropriate reports. When I found these mistakes, I reported the negligence to Chip and Jennifer at the PDC and worked hard to ensure all the filings were current. The 43<sup>rd</sup> District Democrats Executive Board voted to close the PAC and did so legally.

Sincerely,  
*Vivian Queija*  
Treasurer  
[43rd District Democrats](#)