

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported a month ago (Mon, 17 Jul at 1:34 AM) via Portal [Meta](#)
To Whom It May Concern --

It has come to my attention that Shaunie Wheeler -- a candidate for SeaTac City Council, has continued to violate multiple provisions of **RCW 42.17A** in the course of her campaign.

1. State law requires that all contributions and expenditures made prior to registration be reported on the same day C1 form is submitted. State law also requires that all contributions and expenditures be accurately and timely reported. RCW 42.17A.235.

a) Wheeler failed to list the in-kind contribution of her campaign PO Box, specifically PO Box 98785 in Des Moines, WA OR PO Box 297 in Seahurst, WA on the same day the C1 was filed.

b) Wheeler failed to list her filing fee as an in-kind contribution to her own campaign.

Because the filing fee was a campaign-related expense, it must have been reported to the public. This is clearly required by state law.

In fact, Attorney General Slade Gorton rendered an official AG opinion on this exact matter in 1974, when he wrote, in part:

"In simplest terms, this payment (in those cases in which it is required) is a necessary part of the candidate's financial outlay if he is to have his name appear on the ballot and, in that manner, become eligible to be elected to the office he is seeking. Moreover, the payment is very clearly a transfer of something of value and it cannot be doubted that it is for the purpose of assisting the candidate and furthering his election campaign. Payment of the filing fee is thus precisely within the broad definition of "expenditure" as set forth above." -- AGO 1974 No. 16 - July 29, 1974

c) Wheeler failed to list her professional photography as an in-kind contribution or debt.

See attached examples of professional photography on her website that has not been reported.

d) Wheeler failed to report a \$100 contribution to herself.

According to her May L2 report (<https://accesshub.pdc.wa.gov/node/34214>), Wheeler contributed \$100 to her own campaign. Unfortunately, this is not reflected in any campaign records. This must be rectified immediately.

2. State law requires that debts be accurately and timely reported. RCW 42.17A.235, .240.

a) Winpower Strategies -- Wheeler has not reported any debt to Winpower Strategies. What she has currently paid to them does not accurately reflect what she is obligated to pay them for the entire campaign, or – if it does – it is an in-kind contribution from Winpower Strategies to the Wheeler campaign **FAR** in excess of applicable contribution limits. **See WAC 390-16-042, WAC 390-05-295.**

b) On information and belief, the following expenditures should have been reported as debt, but were not:

Vendor	Date	Amount	City	State	Zip	Description	Illegally not reported as debt
WINPOWER STRATEGIES	2017-07-05	2750	SEATAC	WA	98188	WEBSITE AND LIT	This should have been reported as debt on the C4 covering the month of May.
WHEELER SHAUNIE J	2017-06-21	685.67	SEATAC	WA	98198	REIMBURSEMENT FOR YARD SIGNS	This should have been reported as debt on the C4 covering the month of May.
PUNJABI PALACE	2017-06-19	639.93	SEATAC	WA	98188	CATERING FOR KICK OFF PARTY	This should have been reported as debt on the C4 covering the month of May.
MURRAY STAR	2017-07-05	480	SEATTLE	WA	98107	CM SERVICES FOR 6/20-7/1	This should have been reported as debt on the C4 covering the month of May.
CAPITAL CITY PRESS	2017-07-10	463.51	TUMWATER	WA	98512	POSTAGE FOR MAILERS	This should have been reported as debt on the C4 covering the month of May.
MURRAY STAR	2017-06-21	296	SEATTLE	WA	98107	CM SERVICES FOR 6/8-6/19	This should have been reported as debt on the C4 covering the month of May.

3. State law requires that expenditures be properly broken down to include certain sub-vendor information. RCW 42.17A.235, .240, WAC 390-16-205.

The following expenditures were not accurately broken down, in violation of state law.

Vendor	Date	Amount	Description	Failure to properly breakdown
WINPOWER STRATEGIES	2017-07-05	2750	WEBSITE AND LIT	Failure to list subvendor for domain name registration and website creation.
WHEELER SHAUNIE J	2017-06-21	685.67	REIMBURSEMENT FOR YARD SIGNS	Failure to list subvendor for signs.
CAPITAL CITY PRESS	2017-07-10	463.51	POSTAGE FOR MAILERS	Failure to identify USPS as subvendor for postage.
WINPOWER STRATEGIES	2017-07-07	163.33	CAMPAIGN HEADQUARTERS	Failure to list subvendor.

SCHLEGEL STEPHANIE	2017- 05-26	54	PO BOX REIMBURSEMENT	Failure to list subvendor -- the Seahurst PO Box that is listed by this campaign is used by many other organizations. Who did this reimbursement money go to?
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4. State law requires that accurate sponsor ID (to include committee address), be included in all pieces of political advertisement. RCW 42.17A.320 (1).

Wheeler illegally listed her address on the mailer as PO 98786 , SeaTac WA. The current version of her C1 lists the address as PO Box 297, Seahurst, WA.

5. State law prohibits anyone other than the treasurer or deputy treasurer from making deposits into the campaign's bank account. RCW 42.17A.220 (1).

On information and belief, someone other than Wheeler's treasurer has been depositing campaign checks into the campaign bank account.

6. State law requires that both the treasurer and the candidate must certify all contribution and expenditure reports as correct and accurate. RCW 42.17A.235 (7).

On information and belief, Shaunie Wheeler has failed to certify these reports. Instead, her electronic signature is being auto-generated on these contribution and expenditure reports by her treasurer, in violation of state law.

This practice must cease immediately.

7. State law requires that the treasurer or candidate preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred. RCW 42.17A.235 (6).

On information and belief, Wheeler and her treasurer have failed to maintain certain records from the campaign. This should be confirmed by issuing a subpoena for her campaign documents.

This failure to preserve documents constitutes a violation of state law.

8. State law requires that candidate committees identify any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic, or policy decisions on behalf of the committee as officers on their C-1 form. RCW 42.17A.205, WAC 390-05-245. State law further requires that accurate names, addresses, and titles of its officers be included on the committee's C-1. RCW 42.17A.205(2)(c).

On information and belief, Wheeler has failed to list several people who make, direct, or authorize contributions, expenditures, strategic, or policy decisions on behalf of the committee as committee officers, including but not limited to: Winpower Strategies, John Wyble, and Star Murray.

9. State law prohibits expenditures from being made or incurred by any candidate committee unless authorized by the person or persons named on the committee's C-1 registration form. RCW 42.17A.425.

On information and belief, unlisted officers made numerous unauthorized expenditures on behalf of Wheeler, despite not being listed on the committee's C-1 registration form. These unlisted officers include, but are not limited to: Winpower Strategies, John Wyble, and Star Murray.

This constitutes a violation of state law that must be rectified immediately.

10. State law requires that candidates file a personal statement of financial affairs. RCW 42.17A.700. State law further requires that candidates disclose financial payments received by the entities they serve on.

On information and belief, Wheeler has failed to list information about the entities she serves on. Specifically, she neglected to list her board membership on the organizations "South King County Votes", "Win with Women", and "Washington Young Emerging Labor Leaders".

According to her website:

"As a board member of South King County Votes, Win With Women and as the president for Washington Young Emerging Labor Leaders, I'm connected to underserved communities and well-trained in finding solutions that serve everyone."

The PDC should investigate the possibility that Shaunie Wheeler committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)** . If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

I have reason to believe there are other provisions of **RCW 42.17A** that have been violated or are being violated by Wheeler's campaign. The PDC and AG's office should conduct a thorough review of Wheeler's campaign to identify all violations.

Please don't hesitate to contact me if you have any questions.

Best Regards,

Glen Morgan