

October 24, 2023

Corey Amundson
Chief, Public Integrity Section
Department of Justice, Criminal Division
1301 New York Avenue, 10th Floor
Washington, DC 20005

Re: Request for Investigation into Ms. Margarita Wilkinson

Dear Mr. Amundson:

I am writing to request that the Department of Justice immediately investigate Ms. Margarita Wilkinson, a candidate for Congress in California's 49th district, for apparently violating federal law by failing to file a personal financial disclosure report ("PFD"), as required by the amended Ethics in Government Act of 1978 (the "Act").

The Act was designed to "preserve and promote the integrity of public officials and institutions." Ms. Wilkinson's seeming decision not to file a personal financial disclosure report violates those important objectives and is particularly alarming for someone who is running to become a member of Congress. I respectfully request that you investigate this matter and take appropriate action as soon as possible.

I. Factual Background

Ms. Wilkinson filed a statement of candidacy for the 49th Congressional District seat in California on August 15, 2023.¹ Her principal campaign committee, Margarita Wilkinson for Congress 2024, reported raising more than \$5,000 toward the 2024 primary election by August 18, 2023.² Ms. Wilkinson has also loaned her campaign more than \$800,000.³ Ms. Wilkinson has continued to raise and spend significant amounts of money for her 2024 election, and appears to still be running for Congress.⁴

II. Legal Background and Analysis

¹ Margarita Wilkinson, Statement of Candidacy, FEC Form 2 (Aug. 15, 2023), available at <https://docquery.fec.gov/pdf/913/202308159596562913/202308159596562913.pdf>.

² See Wilkinson for Congress, FEC Form 3 (filed October 14, 2023), available at <https://docquery.fec.gov/pdf/085/202310149597783085/202310149597783085.pdf> (showing contributions on August 18, 2023, totaling \$7,116). Although Ms. Wilkinson's statement of candidacy and statement of organization list her principal campaign committee as Margarita Wilkinson for Congress 2024, her campaign appears to have erroneously filed a quarterly report listing the committee's name as "Wilkinson for Congress."

³ See *id.* (showing loans from Margarita Wilkinson's personal funds on August 23 and September 30, 2023, totaling \$825,000).

⁴ See *id.* (showing significant campaign activity through September 27, 2023); Margarita Wilkinson for Congress, <https://vote4margarita.com/>; see also Margarita Wilkinson Facebook Post (Oct. 2, 2023) <https://www.facebook.com/vote4margarita> (press release titled "Margarita to Report \$1 Million Raised").

The Act requires individuals to file a PFD within thirty days of becoming a candidate or by May 15 of the calendar year the individual becomes a candidate, whichever is later.⁵ A candidate must file a subsequent PFD no later than May 15 of each year that they continue to be a candidate.⁶ Filers have the option to request an extension of up to ninety days.⁷ An individual becomes a candidate when they receive contributions or make expenditures aggregating more than \$5,000.⁸

Ms. Wilkinson's principal campaign committee reported receiving contributions aggregating more than \$5,000 by August 18, 2023.⁹ Because of that, it appears that Ms. Wilkinson officially became a "candidate" for purposes of the Act on August 18, 2023. As mentioned above, once an individual qualifies as a "candidate," they must file a PFD within thirty days or by May 15, whichever date is later. Accordingly, Ms. Wilkinson was required to file a PFD no later than September 17, 2023. Yet, over a month later, Ms. Wilkinson still has not filed a PFD in connection with the 2024 election. While Ms. Wilkinson could have requested a 90-day extension and pushed her deadline to December 16, 2023, it does not appear she has done so.

Ms. Wilkinson's seemingly brazen contempt for her financial disclosure obligations is not only a violation of federal law but it deprives the public of critical information about her financial interests. To safeguard the integrity of the electoral process, I respectfully request that you immediately investigate this matter and promptly seek all appropriate penalties and corrective action. I understand that 18 U.S.C. § 1001 applies to the information I am providing. To the best of my knowledge and ability, all evidence submitted was not obtained in violation of any law, rule, or regulation.

Thank you for your prompt attention to this matter.

Sincerely,



End Citizens United
Tiffany Muller
PO Box 66005
Washington, DC 20035

⁵ 5 U.S.C.A. § 13103(c).

⁶ *Id.*

⁷ *Id.* § 13103(g)(1).

⁸ *See id.* § 13103(c); 52 U.S.C.A. § 30101(2).

⁹ *See* Wilkinson for Congress, FEC Form 3 (filed October 14, 2023), available at <https://docquery.fec.gov/pdf/085/202310149597783085/202310149597783085.pdf> (showing contributions on August 18, 2023, totaling \$7,116).