



**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

October 4, 2024

Delivered electronically to Pierce County Young Democrats PAC at
pierceyoungdems@gmail.com

Subject: Complaint filed by Glen Morgan, PDC Case 156731

Dear Joel Anderson:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Mr. Morgan, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, you may contact Tanya Mercier by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Kim Bradford
Deputy Director
For Peter Frey Lavalley
Executive Director



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October 4, 2024

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint against Pierce County Young Democrats PAC, PDC Case 156731

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 1, 2024. We opened a case based on your complaint alleging that the Pierce County Young Democrats, a continuing political committee, may have violated RCW 42.17A.220 by exceeding anonymous contribution limits in calendar year 2021.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements the response(s) provided by the Pierce County Young Democrats PAC (the "Respondent"); the applicable PDC reports filed by the Respondent; and other relevant information, to determine whether the record supports a finding of one or more violations.

Applicable Laws & Rules

- RCW 42.17A.205(1) requires every political committee to register with the PDC within two weeks of organizing or first having the expectation of receiving contributions or making expenditures, whichever is earlier. And per RCW 42.17A.205(4), any material changes in information previously submitted in a statement of organization shall be reported to the commission within the ten days following the change.
- In 2021, RCW 42.17.220(4) limited unidentified contributions in excess of one percent of the total accumulated anonymous contributions received in the current calendar year, or \$300, whichever was more.
- Per RCW 42.17A.235 and .240, under the Full Reporting option, a committee is required to disclose contribution and expenditure information by submitting Receipts and Expenditure Summary (C-4) reports and Cash Receipts, Monetary Contributions (C-3)

reports to the PDC. The Committee's due dates for the C-3 and C-4 reports are determined by its activity and participation in the election cycle.

- RCW 42.17A.235(3)(a) indicates a C-4 report is due each month if the committee has received a contribution or made an expenditure in the preceding calendar month and either the total contributions received, or the total expenditures made since the last such report exceeded \$200, if before April 1, 2023, or \$750, if after April 1, 2023.”
- RCW 42.17A. 235(5) & .240(2) identify the threshold for required reporting of the identity of contributors and WAC 390-16-308 further directs campaigns on the reporting of the source of a contribution.
- WAC 390-16-034 directs campaigns to disclose the name and address of each person who made one or more contributions in the aggregate amount of more than \$100, if before April 1, 2023, or \$250, if after April 1, 2023, as well as their occupation, and the name and location (city and state) of their employer.

Background & Findings

Based on staff's review, we found the following:

- The Respondent filed a Political Committee Registration (C-1pc) on May 4, 2011, as a continuing committee.
- Prior to your complaint, the Respondent submitted C-4 reports for calendar years 2019, 2020, 2021, 2022, 2023 and 2024. The first C-4 in 2019 reported a previous total cash/in-kind balance of \$600.62 and in most cases the C-4 reports, between 2019 and 2024, showed zero contribution and expenditure activity. The exception to the zero-activity reporting was for anonymous contributions for \$500, deposited on September 10, 2021, reported on C-3 #110217808 and C-4 #110217809, on June 2, 2024. The C-3 was amended on July 31, 2024, after your complaint by C-3 #110234649. The amendment attributed the previously classified anonymous contributions of \$500 to the contributor Marilyn Strickland Surplus Funds.
- The Respondent did submit a few reports late and made minor or ministerial errors on C-3 #110217808. Based on the reporting record we see that the Respondent has made a good faith effort to bring reporting into compliance. As well, the Respondent made the necessary technical corrections by filing C-3 #110234649, within 14 days of being notified by PDC staff.
- In addition to the allegation upon which this case was opened, you also alleged the Respondent failed to provide correct, updated information on the C-1pc per RCW 42.17A.205(1) (4).
- PDC staff did find that in prior years the Respondent did not maintain the Statement of Organization as required by RCW 42.17A.205(4). However, the Respondent updated the Political Committee Registration (C-1pc) on June 2, 2024, prior to the filing of your complaint. Based on the reporting record, the Respondent's response to the complaint, and the evidence you submitted, there is nothing that indicates the Respondent was active or took part in elections between 2019 to the period prior to your complaint.
- The Respondent does not have previous warnings or violations of similar PDC requirements.

Summary and Resolution

In response to your complaint, the Respondent said:

Pierce County Young Democrats (PCYD) was inactive between 2021 to 2024. To the best of our knowledge, the organization did not convene regularly or have elected officers during this time. While a former officer remained listed on PCYD's bank account throughout this period, the account and all records pertaining to it were effectively inaccessible to any new individual who may have wanted to restart the organization. In January 2024, Joel Anderson (Chair) organized a small group of Pierce County residents to restart PCYD. Our goal in reactivating the organization is to ensure long-term stability and growth, which includes maintaining full PDC compliance as a political action committee. PCYD is committed to transparency – and since the beginning of 2024, our newly elected officers have intentionally tried to find and organize old records for the organization.

The Respondent also said that the deposit of the \$500 occurred before the current officers were elected. In their response to the complaint, the Respondent showed they acted on July 31, 2024, following the complaint, to identify the contributor(s) by asking that their bank send them a copy of the check(s) deposited on September 10, 2021. The bank provided a copy of a single check, for \$500, from the Marilyn Strickland Surplus Fund account.

After consideration of all the circumstances, further proceedings would not serve the purposes of this chapter. Under WAC 390-37-070, the executive director, at any time prior to consideration by the Commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted. The executive director must report at each regular Commission meeting all complaints dismissed.

Based on this information, the PDC finds that no further action is necessary and hereby resolves these matters as a technical correction per RCW 42.17A.755(1) & (2) and WAC 390-37-060.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, you may contact Tanya Mercier by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Kim Bradford
Deputy Director
For Peter Frey Lavallee
Executive Director

cc: Pierce County Young Democrats