Respondent Names

Pierce County Young Democrats PAC

Complainant Name

Glen Morgan

Complaint Description

Glen Morgan

Mon, 1 Jul 2024 at 7:03 PM

To whom it may concern,

It has come to my attention that the Pierce County Young Democrats PAC has violated Washington State's Campaign Finance Laws (RCW 42.17A) during their 2021 PAC activities. The violations are as follows:

1) Illegal acceptance of overlimit anonymous contributions (Violation of RCW 42.17A.220(4))

Based on the information reported by this campaign to the PDC at the time, it appears that this campaign has accepted \$500 in anonymous contributions (See PDC C3 # 110217808– attached for reference). This campaign had only reported raising enough money to accept up to \$300 in anonymous contributions as the statute so clearly details in RCW 42.17A.220(4), so at least \$200 must be forfeit of this secretive anonymous contribution.

Please note, at the time these illegal anonymous contributions were secretly transferred into this PAC's account, the legal limit for anonymous contributions was \$300, so this PAC must forfeit (escheat) at least \$200 to the state treasurer as specifically required in RCW 42.17A.220(4).

I have no idea how I missed this in my last batch of complaints, but better to catch the lawbreakers late than never.

2) Failure to provide accurate, updated information on C1PC report (Violation of RCW 42.17A.205(1), (4))

The general sloppiness and failure to follow the law by this PAC is also reflected in the fact that they haven't updated their formation documents (C1PC) filed with the PDC despite numerous changes in leadership since their most current C1PC document was filed (See PDC C1PC #10077518 attached for staff reference). If one were to look at their website which lists their current leadership, you will see none of the names or positions are the same. It seems likely that this information has changed repeatedly over the past 5 years, yet it has

never been updated or corrected as clearly required in RCW 42.17A.205(4). Another clear and obvious violation of Washington State's glorious campaign finance laws.

I'm sure numerous other violations have been committed by this organization, but it will take a complete financial audit to get to the bottom of it, so this is just a good place to start.

Let me know if you need more details on this crew or their violations.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public has a right to know where secretive, concealed contributions to shady PACs like this one come from. Who is funding them? On top of this, the public has a right to know who runs shady PACs like this one. They should not be allowed to conceal the truth for so many years from the public or the PDC. Yet, they have done so.

List of attached evidence or contact information where evidence may be found

All documents referenced in the body of the complaint are attached as exhibits

List of potential witnesses with contact information to reach them

Everyone listed on their true officers list (on their website) as opposed to their fraudulent C1PC, which hasn't been updated for half a decade. It would probably be a good idea to subpoena their bank records as well and see if the money is really still there, and if the amounts really have remained static for so many years as has been reported so far.

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



711 Capitol Way Suite 206 PO Box 40908 Olympia, WA 98504-0908 (360) 753-1111 Toll Free 1-800-601-2828

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

PIERCE COUNTY YOUNG DEMOCRATS (PCYD)
PIERCE COUNTY YOUNG DEMOCRATS 6235 S. Oakes St.
TACOMA, WA 98409

Deposit date: 09/10/2021 Report number: 110217808 Submitted date: 06/02/2024

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
09/10/2021	a. Anonymous	\$500.00	\$500.00
	 b. Candidate's personal funds deposited in the bank (include candidate loans in 1c) 	\$0.00	\$0.00
	c. Loans, notes, security agreements (Schedule L)	\$0.00	
09/10/2021	d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
	e. Small contributions	\$0.00	

2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$500.00

Bronwyn Clarke - 06/02/2024

Corresponds to amount on line 1, Schedule A to C4, and itemized below

3. ITEMIZED CONTRIBUTIONS

Date received	Contributor (Name and address)	Employer and address	Amount	Aggregate total
Date of deposit 09/10/2021	I certify this report is Treasurer's signature	true and complete to the best of my knowledge and date		



Political Committee Registration

C1PC

100775118 AMENDS 1001296319

					B4.	±4220±9
Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.) PIERCE COUNTY YOUNG DEMOCRATS		Acronym: PCYD				
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			Telephone: 253-227-7613			
Mailing Address						
3049 S 36TH ST # 101				Fax:		
City	County	Z	ip + 4			
TACOMA	PIERO	CE 9	8409	E-mail: PIERCEYOUNGDEMS@GMAIL.COM		
NEW OR AMENDED REGISTRATION? □ NEW. Complete entire form. □ AMENDS previous report. Complete entire form. □ AMENDS previous report. Complete entire form. □ election year only. Date of general					on.)	
AMENDO previous report. Complete entire form		(Year) election ye	ar only. Date of general	or special election.		
What is the purpose or description of the committee Bona Fide Political Party Committee - official st of the names of the candidates you support.		central committee or legisla	ative district committee.	If you are not support	ing the entire party	ticket, attach a list
☐ Ballot Committee - Initiative, Bond, Levy, Recall,	etc. Name o	r description of ballot meas	ure:		Ballot Number	FOR AGAINST
Other Political Committee - PAC, caucus comm name:	ittee, political	club, etc. If committee is re	elated or affiliated with a	business, association	n, union or similar e	entity, specify
For single election-year only committees (not continuing committees): Is the committee supporting or opposing (a) one or more candidates? Yes No If yes, attach a list of each candidate's name, office sought and political party affiliation. (b) the entire ticket of a political party? Yes No If yes, identify the party:						
2. Related or affiliated committees. List name, address	ss and relation	nship.			☐ Continue	ed on attached sheet.
below. (If your committee status is continuing, esting if no box is checked you are obligated to use MINI REPORTING Mini Reporting is selected. No more than than \$500 in the aggregate will be accepted.	Full Reporti	ng. See instruction manual raised or spent and no mo	als for information about FULL REPO		equent, detailed ca	
4. Campaign Manager's or Media Contact's Name and Address LINDSEY DWYER 407 VALLEY AVE NE APT R105, PUYALLUP WA 98372				Telephone Number: 253-376-5228		
5. Treasurer's Name and Address. Does treasurer perform only ministerial functions? Yes No_X. See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet. ALEXANDER E CORNYN 407 VALLEY AVE NE APT. L106, PUYALLUP WA 98372 Daytime Telephone Number: 253-394-3419						
6. Persons who perform only ministerial functions on to persons. See WAC 390-05-243 and next page for	ehalf of this o	committee <u>and</u> on behalf of	candidates or other polit	ical committees. List	name, title, and ad Continued on	
7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer." Continued on attached sheet. LILLIAN FERRAZ, CHAIRMAN, 5504 EAST E ST, TACOMA WA 98404 KEANAN TAUTE, OUTREACH ORGANIZER, 1106 7TH ST SW, PUYALLUP WA 98371 ALEXANDER CORNYN, TRESURER, 407 VALLEY AVE NE, APT L106, PUYALLUP WA 98372						
8. Campaign Bank or Depository WSECU			Branch NY	C AN	ity 1Y	
Campaign books must be open to the public by app holidays. In the space below, provide contact information post office box or an out-of-area address.						
Street Address, Room Number, City	where camp	paign books will be availa	ble for inspection			
407 VALLEY AVE NE, PUYALLUP In order to make an appointment, contact the camp	aign at (telen	hone, fax, e-mail): 253-	394-3419 ALE	XCORNYN@OUT	LOOK.COM	
10. Eligibility to Give to Political Committees and must receive \$10 or more each from ten Wa contributing to a Washington State political community or making a contribution to a state office received contributions of \$10 or more each from	State Office shington Stat nittee. Addition e candidate	Candidates: A committed te registered voters before conally, during the six month your committee must have	e 11. Signature and C e and correct to the bes s e Committee Tr	Certification. I certify est of my knowledge.	that this statemer	nt is true, complete
voters. A check here indicates your awareness of and Absence of a check mark means your committee State political committees and/or state office cand	pledge to co e does not qu	mply with these provisions	ALEXANDER 	E CORNYN		07-14-2017

Attachment to C1PC – Political Committee Registration

Name PIERCE COUNTY YOUNG DEMOCRATS

2. Related or affiliated com	mittees
C Danista Transpurara Nam	:
5. Deputy Treasurers Nam	e and Address.
6 Darsons who parform or	nly ministerial functions, Name, Title and Address.
6. Fersons who perform or	ny ministerial functions, mame, mie and Address.
7. Committee Officers, List	Name, Title and Address.
LINDSEY DWYER	CAMPAIGN MANAGER 407 VALLEY AVE, NE APT. R105, PUYALLUP
JOSE NEIVES	SERGEANT-AT-ARMS -, - WA 99999
BEN LASKEY	VICE CHAIRMAN 4309 N FRACE AVE, TACOMA WA 98407
FELICIA JARVIS	COMMUNICATIONS DIRECTOR, - WA 99999
NATASHA LAITILA	PARTY COORDINATOR -, - WA 99999



2024 Executive Board

Chair: Joel Anderson

Vice Chair: George Conzuelo

Communications Officer: Alexa Brenner

Treasurer: Bronwyn Clarke

Secretary: Peter Ramaley

Bylaws of the Pierce County Young Democrats

As Adopted on January 21, 2024, adapted from the Young Democrats of Washington Chapter Bylaw Template

We, the Pierce County Young Democrats, seek to empower and engage young people using politics, government, and the Democratic Party. We seek to promote all interests of young people within the party and our greater community. It is our intent that all eligible young people in Pierce County receive more civic, educational, social, economic, and other relevant opportunities in community, the Democratic Party, and Young Democrat Organizations than those who came before us. Our work shall positively reflect on the positive values and aspirations of our country, party, and our fellow Young Democrats who serve throughout the state of Washington and the United States of America.