Respondent Name

Citizens for Community Driven Prosperity PAC

Complainant Name

Glen Morgan

Complaint Description

Glen Morgan

reported via the portal (Mon, 6 Mar 2023 at 9:19 AM)

To whom it may concern,

It has recently come to my attention that the Citizens for Community Driven Prosperity PAC appears to have violated Washington State's campaign finance laws (**RCW 42.17A**) from its inception to today. The details are as follows:

1) Failure to properly identify as a sponsored committee (Violation of RCW 42.17A.005(47)(b)(i), WAC 390-16-011A)

This secretive PAC received more than 80% of its funding sourced from one primary sponsor source in 2019. Specifically, the Community Driven Prosperity PAC received \$5,000 in 2019 from one cash contributions from one primary sponsor. Furthermore, when reviewing every C3 ever filed by this secretive PAC, it appears this one primary sponsor is the only entity that has ever funded this PAC. That **primary sponsor was the Community Driven Prosperity PAC sponsored by the United Association of Plumbers and Steamfitters Local 598 PAC**. Specifically, the Community Driven Prosperity PAC sponsored by the United Association of Plumbers and Steamfitters Local 598 PAC transferred \$5,000 on September 25, 2019 (See **PDC C3 # 100936369** attached). If there had been any interest in complying with the law, this sponsored PAC should have corrected their C1PC and renamed themselves the "Citzens for Community Driven Prosperity Pac sponsored by the United Association of Plumbers and Steamfitters Local 598 PAC" but, obviously there was no attempt by this professional, well-funded PAC to follow the law.

Just for further documentation, this PAC has only ever received money from this one secretive PAC, the previous contribution was made on June 26, 2017 (See **PDC C3 # 100776348** attached).

The law is very clear, as **WAC 390-16-011A** clearly states:

"A sponsored political committee must amend its C-1pc sixty days before an election in which it participates if the committee's name on its most recently filed C-1pc does not include at least one current sponsor."

This political committee failed to comply with the law and correct it's 2019 C1PC filing as well as every C1PC filing since that time to properly reflect that it was a wholly sponsored PAC with 100% of its funding coming from another sponsored PAC. The records indicate nothing has changed at this continuing committee since that time, so this correction should bring them back into statutory compliance based on what can be ascertained from existing documents. It is hard to be certain, of course, with dark money PACs like this one, but it is a good start towards some level of legal compliance.

I will note for the record, obviously, that both PACs share the same address and treasurer, so compliance should be simple, and confusion can not be a legitimate claim at this time. Shifting cash around from one bank account to another in an effort to conceal the source of the original funds, while it may be common practice, still should not prevent a dark money PAC from properly following the law.

Flagrant and significant violations of the Washington State Campaign finance laws like this should result in some penalty or this case will just further encourage more flagrant lawbreaking to mock the campaign finance laws further. In might be nice to discourage further lawbreaking in order to ensure that violations like this do not become habitual or repeated in the future.

This should be enough to get the investigation started.

Best Regards,

Glen Morgan

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

The public has a right to know who exactly is sponsoring secretive dark money PACs like this one, particularly when they are essentially just shifting cash around from one bank account to another in an effort to conceal this information. There is a reason why sponsored PACs need to reveal this fact in their name, not just in the background.

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

Referenced C3s attached. C1PCs are available on the PDC website

List of potential witnesses

Treasurer and Officers at least.

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.



CASH RECEIPTS MONETARY CONTRIBUTIONS



THIS SPACE FOR OFFICE USE

100776348 AMENDS 100776253 07-21-2017

Candidate or Committee Name (Do not appreviate	e. Use full name.)		
Citizens for Community Driven	Prosperity PAC (Ci	tizens for Community	
Mailing Address			
1328 N Road 28			
City	Zip + 4	Office Sought (candidates)	Election Date

1328 N	Road 28						
City	Zip + 4		Office Sought (cand	idates	s)	Election Dat	e
Pasco,	WA 99301					2017	
1. MONET	TARY CONTRIBUTIONS DEPOSITED IN ACCOUNT						
Date Received						Amount	Total
	a. Anonymous						
	,				ľ		
	b. Candidate's personal funds deposited in the ba	ank (include (candidate loans in 1c)			ны от от техня меня по техня меня меня по техня меня меня по техня меня меня меня меня меня меня меня ме	
	c. Loans, notes, security agreements. Attach Sc	hedule L					
	d. Miscellaneous receipts (interest, refunds, auct	ions, other).	Attach explanation				
	e. Small contributions \$25.00 or less not itemized	d and number	r of persons giving (p	ersor	ns)		
2. CONTR	IBUTIONS OVER \$25.00				G		
Date Received	Contributor's Name, Address, City, State, Zip		tions of more than \$100:* er's Name, City and State	P R I	E N	Amount	Aggregate [*] Total
6/26/17	Community Driven Prosperity			T			Total
0/20/17	1328 N Road 28					9,500.00	9,500.00
	Pasco, WA 99301					,	·
		Occupation	1	1			
		Occupation	1				
		Occupation	1				
		Occupation	1	1			
		Occupation					
		Cocapation		Sub-t	otal	9,500.00	
	☐ Check here if additional pages are attached		Amo attach	unt f		0.00	*See reverse
	3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO A Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A			-		9,500.00	for details.
4. Date of			I certify that this report is	true a	nd com	plete to the best of my	/ knowledge
07,	/03/17		Treasurer's Signature			I	Date
Tropourse'	s Daytime Telephone No.: (509)545-1446		Randy Walli			С	7-21-2017
rreasurer	s Daytime Telephone No.: $(509)545-1446$						



CASH RECEIPTS MONETARY CONTRIBUTIONS

THIS SPACE FOR OFFICE USE

100936369

10-10-2019

Candidate or Committee Name (Do not abbreviate. Use full name.)
Citizens for Community Driven Prosperity PAC (Citizens for Community
Mailing Address
1328 N Road 28

City Zip + 4Office Sought (candidates) **Election Date** 2019 Pasco, WA 99301 1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT Date **Amount Total** Received a. Anonymous b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)..... c. Loans, notes, security agreements. Attach Schedule L..... d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation e. Small contributions \$25.00 or less not itemized and number of persons giving (persons) 2. CONTRIBUTIONS OVER \$25.00 Contributions of more than \$100:* Aggregate* Date R Ε **Amount** Employer's Name, City and State Received Contributor's Name, Address, City, State, Zip **Total** 09/25/19 Community Driven Prosperity 1328 N Road 28 \$5,000.00 \$5,000.00 Pasco, WA 99301 Occupation Occupation Occupation Occupation Occupation Sub-total \$5,000.00 Check here if additional Amount from \$0.00 pages are attached *See reverse attached pages 3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT for details. \$5,000.00 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4. 4. Date of Deposit I certify that this report is true and complete to the best of my knowledge

10/10/19

Treasurer's Daytime Telephone No.: (509)545-1446

Treasurer's Signature Date

Randy Walli

10-10-2019