FROM THE HONORABLE DESK OF ERIC EUGENE CROWL -- REPUBLICAN PCO ELECT 28-556 (LAKEWOOD, PIERCE COUNTY, WASHINGTON) [2024-2026 TERM]

November 27th, 2024

NOTICE OF DEMAND TO CEASE AND DESIST (WITH TIMELY REMEDY TO CURE); AND DEMAND FOR PRODUCTION AND INSPECTION OF DOCUMENTS

Dear Pierce County Republican Party,

I was elected in the Washington State Primary Election of 2024 (August) as a Republican Party PCO for District 28-556 [pursuant to RCW 29A.80.041] for the 2024-2026 term [pursuant to RCW 29A.80.051]. I am fully qualified to perform my lawful duties as codified under RCW 29A.80.041.

These lawful duties include participation in party processes such as voting in party matters and for party officials (for their respective seats) and other party affairs (such as bylaw construction and adoption, for example).

I received a letter from you notifying me that I am being obstructed (by decree) from participating in the upcoming December 7th, 2024 Biennial Organization Meeting on December 7th, 2024 - which is to be conducted at "Experience Church, 10012 122nd St E, Puyallup, WA, 98373". The letter referred to a "re-organization meeting", which doesn't appear anywhere in the bylaws. It further refers to the "executive" – which I shall assume means the "Executive Board" for the purposes of this letter

The aforementioned meeting is conducted by the Pierce County Republican Party under its Bylaws [section 4] and by statute [pursuant to RCW 29A.80]. This meeting is open to the public, and the sole purpose of the meeting is to conduct party business through its elected officers.

Your letter informed me that a vote was conducted by the Executive (aka "Central Committee"] at a meeting. I am not aware of any such meeting, nor was I adequately notified that such a meeting would occur, nor was I notified of who the participants were, nor was I provided with any meeting minutes thereof (including a roll call report or cast vote report), nor am I aware of any authority that would exist to allow the committee or any person to order that an Elected PCO be excluded from a future meeting.

In fact, I am aware that certain persons within the PCRP have been working in an unlawful conspiracy to obstruct me -- far prior to any such alleged vote -- as a means to obstruct me from being able to discharge my official duties. Specifically, that the people conspiring to do so are aware that I have been campaigning against their re-election to the executive or district boards and committees. This [your letter] is, for all intents and purposes, thinly veiled lawfare.

I am also aware that such a conspiracy extends beyond Executive Committee / Board personnel. I am further aware that the persons engaged in this conspiracy have no authority under any bylaw of the PCRP to exclude me without valid cause. You have not communicated any specific cause that would qualify me for removal.

I am further aware that prior to any such alleged vote that persons were acting in concert and collaboration to refuse my membership payments. This was obviously done as a procedural-ruse. A clear and obvious attempt to maliciously wield the bylaws – as it constitutes a specific act of refusal to follow procedure in the spirit of raising false [self-made] claim of "bad standing (for nonpayment of dues)".

This bad faith act is further exampled through the unspecified allegations raised in the letter you sent me. In fact, you sent me a form letter that was also sent to other Elected PCO's, with the same vague, unsubstantiated, and broad accusations – which also lacked any specificity of cause.

There is no process outlined in the PCRP bylaws to remove an Elected PCO – evidenced by the clear omission of any such provision; while there are provisions (for example) clearly outlined for removing other officers and appointed PCO's, as well as standing requirements for *those* elected officers (but not Elected PCOs).

This leaves us with a prima facie context that the sole purposes for excluding me are: [1] unsubstantiated claims; [2] personal acts performed by dubious actors outside of the constraints of the bylaws; [3] a purposeful violation of notice requirements; and [4] acts of a dubious nature among conspirators meant to criminally obstruct me from performing my statutorily authorized duties as an elected official (and as clearly stated in the bylaws; and [5] bad faith acts in totality.

I have not engaged in any conduct violative of Bylaw 2.4 ["Conduct of Precinct Committee Officers"], which is the sole provision that defines acceptable conduct for Elected PCO's.

Further, Bylaw 4.1 specifically commands that "Elected PCOs shall comprise the CC for the Biennial Organization Meeting". Further Bylaw 2.3 specifically commands "The position of PCO has both executive- and legislative-type duties." There is no mention of any membership, standing, dues, or other requirements (aside from the statutory requirements under RCW to be an Elected PCO. The term shall is used, not "can" or "should" – this is a command directive, absent additional qualifying provisions.

Furthermore, I am fully in compliance with all membership requirements set forth in Bylaw 1.4. This is evidenced prima facie by a lack of any specific and refuting material evidence or substantive allegations which would substantiate any such wild claim. An object trier of review would also be forced to ask the question, specifically, of "what standards" are used to make such a determination. In absence of any reasonable trier or disclosure of facts, this leaves such allegations as specious conjecture rife with malicious bias and documented / planned dubious intent and purpose [sic: bad faith acts].

"1.4: Membership in the PCRP shall be open to all who: are both U.S. Citizens and Pierce County residents; pay dues described in the Standing Rules Addendum; declare themselves PCRP Bylaws and Standing Rules 2023-2024 Republicans; do not belong to any other political party; support Republican values and platform objectives; are a registered voter; honor the PCRP and the WSRP; refrain from behavior damaging to the party; and faithfully participate in party activities. A member in good standing is in compliance with all of the above. Associate Membership in the PCRP may be granted to Republicans who meet the above criteria who are not Pierce County residents, examples

of which may include officials who are elected or appointed to serve Pierce County residents but who live in another county"

Your refusal to accept my dues was stated as a means to exclude me from voting and participating in my duties – by denying me "membership". This is an act you chose to commit, not of any violating of any provision on my own accord. This refusal began long before any such alleged vote, occuring in March, May, August, September, and November. I made my dues payments, repeatedly in good faith – even though they are NOT ACTUALLY REQURED TO ATTEND THE MEETING YOU CLAIM I AM EXCLUDED FROM (per the very bylaws you referenced, or otherwise omitted reference to).

Your stated reason for refusal to onboard me as a "member" was not specified, other than a vague quote of the bylaws, without any substantial material causes or specific acts or issues that you claim can bar me from membership.

You have forthwith refused to discuss any of these things with me in any material detail, although I have requested that you do so; and in a timely manner as to address the urgency to such matters.

Furthermore, you have not provided me with the required notice of 10 days of the Biennial Organization meeting occurring (time, place, etc) as required by Bylaw 4.1a "a Meeting notice mailed or e-mailed to each newly elected PCO at least ten (10) days before the scheduled date of the Meeting" either. It clearly states "newly elected PCO", and makes no mention of any membership requirements, either. An elected PCO is defined by RCW RCW 29A.80.051.

I was further excluded from a notification regarding alleged fee-payment requirements, which was also absent adequate notice. Further, as noted above – there are no such bylaws that would require me to make a fee payment to participate in the Biennial Organization Meeting; and, you've purposely rejected such payments anyways.

Furthermore, I am NOT REQUIRED TO BE A "MEMBER" or "IN GOOD STANDING" to vote or otherwise participate in the Biennial Organization Meeting, pursuant to Bylaw 4.1a,b – which states:

"4.1.a: The Biennial Organization Meeting of the Central Committee shall be called pursuant to RCW 29A.80, by a Meeting notice mailed or e-mailed to each newly elected PCO at least ten (10) days before the scheduled date of the Meeting. The incumbent PCRP CC Chair shall open the Meeting and serve as temporary chair. An appropriate Officer shall swear in the elected PCOs after they repeat their affirmation that they are Republicans, do not belong to any other political party eligible to nominate candidates for elective office, and that their PCRP activities shall be governed by the PCRP's duly enacted Bylaws and Standing Rules. CC Officers shall then be elected in accordance with Bylaw 5.1. Committee Officers shall then be elected in accordance with Bylaw 5.1. Those Officers elected must be and continue to be PCRP Members in Good Standing."

In fact, it only states that the "CC Officers" and "Committee Officers" will then be elected and must be "PCRP Members in Good Standing" – I am already an Elected PRECINCT COMMITTEE OFFICER.

My behavior is mandated by bylaw 2.4, which states: "A PCO is a publicly identified representative of the Republican Party. Therefore, a PCO's public acts should not, by their nature,

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Cordially,

27 Republican Party Precinct Committee Officer for 28-556 (Lakewood, Pierce County)

10002 112TH ST SW 28

29 LAKEWOOD, WA 98498

(253) 228-6036 [cell]

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advance the cause or the candidates of another party nor promote the political success of publicly known activists or officials of another political party in partisan campaigns. Examples of such displays could include endorsements in writing or supporting speeches at public events."

Nothing in your exclusion letter states any violation of my conduct, nor do any Bylaws provide any method for sanctioning me anyways as an Elected PCO. In short, the bylaws you quoted and the causes you allege are punitively interpreted outside of the constraints of the bylaws you have referenced.

HENCEFORTH, YOU ARE HEREBY COMMANDED TO:

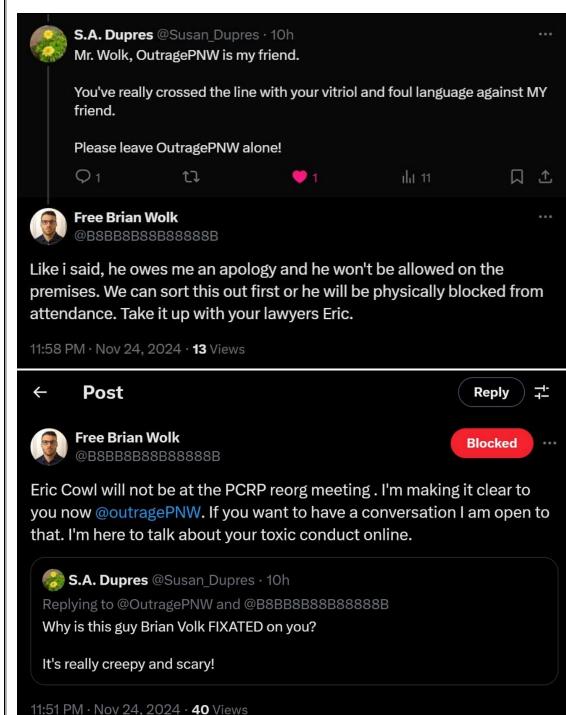
[1] Immediately cease and desist any and all actions which would seek to bar or obstruct me from discharging my lawful duties as an Elected PCO for District 28-556, including any attempts by any PCRP member to physically prevent me from attending or voting in the upcoming Biennial Organization Meeting or receiving duly required notices; and

[2] Immediately issue a retraction of your previous letter informing me of your intent to continue to engage in an unlawful criminal conspiracy to obstruct me [an elected official] from discharging my duties as codified by statute (and as commanded in the bylaws).

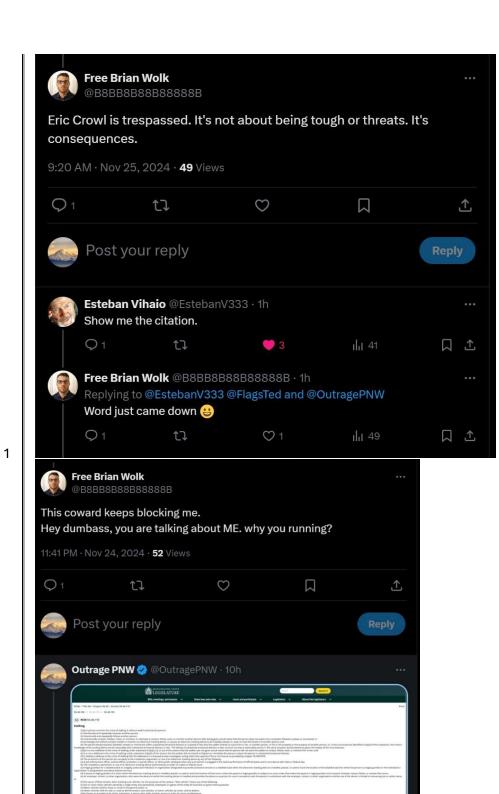
[3] Provide the names of all persons engaging in this unlawful conspiracy, including any and all accompanying records (emails, minutes, notices, etc).

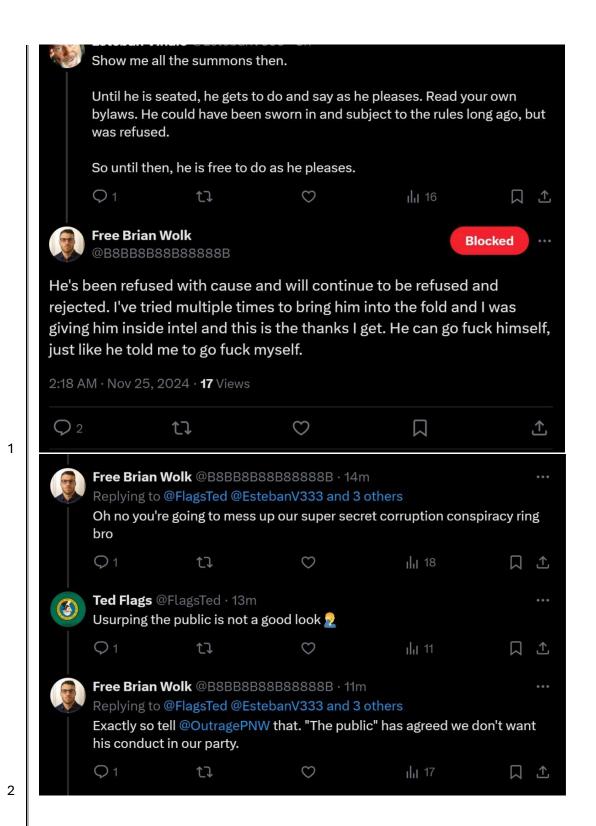
WHEREFORE, having commenced and executed such notice by deliver, you are further notified that refusal to promptly conduct such remedying acts constitutes a willful disregard and continuance of injurious acts, and that such acts are subject to enforcement by any lawful means required to remedy.

WHEREFORE, Beit resolved that this demand requires that you must remedy and cure such relief demanded by no later than 11/29/2025 at 5:00 PM.



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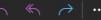




Brian Wolk < electbrian wolk@gmail.com >







Sun 11/24/2024 9:21 PM

To: Eric Crowl

Flagged Start by 11/24/2024. Due by 11/24/2024.

Don't email me again Eric.

I was willing to help you then you told me to go fuck myself and blocked me.

I think you should stay out of the PCRP, they want you to stay out and I agree with them now, you are a divisive psycho.

On Sun, Nov 24, 2024, 9:18 PM Eric Crowl < eric.crowl@citizenobservers.org wrote:

Greetings Brian Wolk,

I am a newly elected PCO for the Pierce County Republican Party (PCRP) – representing District 28-556 (Lakewood). Some of you may know me through my X handle, <u>@OutragePNW</u>.

I wanted to reach out to you and introduce myself prior to the scheduled December 7th, 2024 Biennial Reorganization Meeting. As I understand, you were also elected for the District 27-488 position.

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