



**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

January 15, 2025

Delivered electronically to Citizens for Liberty and Labor at citizensforlibertyandlabor@gmail.com

Subject: Complaint filed by John Estey, PDC Case 161352

Dear Geoff Bracken:

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

As noted in the letter to Mr. Estey, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and WAC 390-37-060(1)(a) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

If you have questions, you may contact Tanya Mercier, Compliance Officer, 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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January 15, 2025

Delivered electronically to John Estey at johnestey97@gmail.com

Subject: Complaint regarding Molly Marshall, PDC Case 161352

Dear John Estey:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 24, 2024. The complaint alleged that Citizens for Liberty and Labor (Respondent), a political committee, may have violated RCW 42.17A.235 and .240 by failing to timely and accurately disclose contributions and expenditures on Cash Receipts, Monetary Contributions (C-3) reports and Receipts and Expenditure Summary (C-4) reports; and RCW 42.17A.405 by accepting over-limit contributions. PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; and the applicable PDC reports filed by the Respondent to determine whether the record supports a finding of one or more violations.

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

- Citizens for Liberty and Labor filed a Political Committee Registration (C-1pc) with the PDC on March 25, 2019, amended October 23, 2024, for the Full Reporting option as a Continuing Committee. Geoff Bracken is the Ministerial Treasurer.
- The Respondent participated in the 2024 election.
- 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.405 describes the limits on monetary and in-kind contributions to candidate committees.
- In your complaint you allege:
The Molly Marshall Campaign and Citizens for Liberty and Labor are in violation of RCW 42.17A.005(15)(a)(iii) and 42.17A.005(30) because Hamilton Studios, an authorized agent of the Molly Marshall Campaign

(having produced political advertising for the campaign) also produced ads for Citizens for Liberty and Labor, a committee running independent expenditures in support of Molly Marshall and against her opponent, Al French.

- We have determined there is no evidence that Hamilton Studios, a vendor utilized by both the Molly Mashall campaign and Citizens for Liberty and Labor, acted as an authorized agent, as defined in WAC 390-15-190, for either entity.

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), and WAC 390-37-060(1)(a).

If you have questions, you may contact Tanya Mercier, Compliance Coordinator, by e-mail at pdcc@pdc.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

cc: Citizens for Liberty and Labor