

<b>Respondent Name</b>
Citizens for Liberty and Labor
<b>Complainant Name</b>
John Estey
<b>Complaint Description</b>
<p><a href="#">John Estey</a> reported via the portal (Thu, 24 Oct 2024 at 6:11 PM)</p> <p>Molly Marshall is a candidate for Spokane County Commissioner. In her campaign, she used a vendor named “Hamilton Studios” on many different occasions <b>(EXHIBIT 1)</b>.</p> <p>Of note, this is not the first time candidate Molly Marshall and Hamilton Studio have been subject to a complaint. See case no. #155727, where the PDC found in the affirmative that Molly Marshall campaign violated <b>RCW 42.17A.405</b> by accepting in-kind contributions in excess of contribution limits and received a formal written warning from the PDC <b>(EXHIBIT 2)</b>.</p> <p>The Citizens for Liberty and Labor (CFL) is a political action committee registered with the Washington State Public Disclosure Commission. CFL is running independent expenditures in support of Spokane County Commissioner candidate Molly Marshall <b>(EXHIBIT 3)</b>. However, CFL also used Hamilton Studio to produce campaign advertising <b>(EXHIBIT 4)</b> in blatant violation of coordination laws.</p> <p><b>It is particularly egregious for the campaign and independent expenditure effort to use the same vendor to produce political advertising.</b></p> <p>It should not go un-noted that the effort by Molly Marshall, Citizens for Liberty and Labor, and Fuse Washington to remove Commissioner Al French via the Clean Water Accountability Coalition from office is ripe with multiple examples of overlap and contributions in excess of the allowable limits.</p> <ul style="list-style-type: none"> <li>•</li> <li>• Fuse Washington is the largest single contributor to Citizens for Liberty and Labor <b>(EXHIBIT 5)</b></li> <li>•</li> <li>• Fuse Washington also has crystal clear ties to Clean Water Accountability Coalition which is the committee behind the recall effort against Commissioner Al French. <ul style="list-style-type: none"> <li>○</li> <li>○ Fuse is CWAC’s largest contributor via Fuse Votes and Fuse Washington, totaling \$6,463.09 (Fuse Votes gave \$3,161.54 and Fuse Washington gave \$3,301.55. <b>(EXHIBIT 5)</b></li> <li>○</li> <li>○</li> <li>○ CWAC’s Operations Director is a Fuse employee <b>(EXHIBIT 6)</b> and even uses his Fuse email address for his contact for the PDC registration <b>(EXHIBIT 7)</b></li> <li>○</li> <li>○</li> <li>○ CWAC’s own website list the effort as a “joint project” between CWAC and Fuse Washington <b>(EXHIBIT 8)</b></li> <li>○</li> </ul> </li> <li>•</li> <li>• Fuse Washington is also a direct contributor to Molly Marshall’s campaign for County Commissioner. <b>(EXHIBIT 9)</b></li> <li>•</li> <li>•</li> <li>• The Public Disclosure Commission has already determined a connection between the Clean Water Accountability Coalition (again, whose Operations Director is a Fuse Employee) and Molly Marshall’s campaign as noted by PDC Commissioner Doug North to the <i>Spokesman Review</i>. <b>(EXHIBIT 10)</b></li> <li>•</li> <li>• I would also refer you to PDC Case 161153 which was filed on October 24, 2024 concerning additional complaints and violations by these actors.</li> </ul> <p>Finally, in full disclosure and transparency to the PDC (and conversely to how the campaign and committees supporting Molly Marshall operate), I am filing this complaint as a concerned citizen who is tired of the repeated pattern of these outside</p>

groups blatantly violating steadfast and commonly known campaign finance laws to illegally influence campaigns and elections. Again, it is particularly egregious for the campaign and independent expenditure effort to use the same vendor to produce political advertising which is what prompted me to file this.

#### Violations:

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- 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.
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- Citizens for Liberty and Labor are in violation of **RCW 42.17A.260(5)** having signed multiple declarations that their expenditures were not made in cooperation, consultation or in concert with an agent of the Molly Marshall Campaign.
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- The Molly Marshall Campaign is in violation of **RCW 42.17A.405** having received contributions as defined by **RCW 42.17a.310** in excess of the legal limit from Citizens for Liberty and Labor for campaign ads produced by Hamilton Studios which is an agent both the Molly Marshall Campaign and Citizens for Liberty and Labor committee.
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- Citizens for Liberty and Labor is in violation of **RCW 42.17A.405** having given contributions as defined by **RCW 42.17a.310** excess of the legal limit to the Molly Marshall Campaign for campaign ads produced by Hamilton Studios which is an agent both the Molly Marshall Campaign and Citizens for Liberty and Labor committee.
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- The Molly Marshall Campaign is in violation of **RCW 42.17A.235 & .240** for failing to accurately and timely report their contributions and expenditures.
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- Citizens for Liberty and labor are in violation of **RCW 42.17A.235 & .240** for failing to accurately and timely report their contributions and expenditures.

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

Washington State is a national leader on transparency in elections. As such, the Washington State Public Disclosure Commission plays a very important role in shining a bright light on political campaigns and candidates. Washington citizens are particularly leery of dark, outside money and, it's for this reason, thankfully, that Washington has strict rules surrounding independent expenditures and coordination.

Spokane County Commissioner candidate Molly Marshall and Citizens for Liberty and Labor PAC are failing to comply with the most basic principles of campaign finance and coordination laws. Willfully ignoring campaign finance laws shows a complete lack of regard to the people of Washington and the voters of Spokane County. Candidates running for public office and the political action committees supporting them should follow the laws the people of Washington State have implemented.

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

See attachment for full list of evidence plus screen shots...

An overview of the evidence:

Exhibit 1: Candidate Molly Marshall expenditures to Hamilton Studios

Link to PDC website: [https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/3288021?expenditure\\_recipient=Hamilton#expenditures](https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/3288021?expenditure_recipient=Hamilton#expenditures)

Exhibit 2: Candidate Molly Marshall receiving a formal written warning from the PDC regarding violating RCW 42.17A.405 by accepting in-kind contributions in excess of contribution limits from Hamilton Studios.

Link to PDC website: <https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/155727>

Exhibit 3: Independent expenditures made by outside groups in support of Spokane County Commissioner candidate Molly Marshall.

Link to PDC website: [https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/3288021#independent\\_expenditures](https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/3288021#independent_expenditures)

Exhibit 4: Citizens for Liberty and Labor expenditures to Hamilton Studios

Link to PDC website: [https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2024-3342?expenditure\\_recipient=hamilton#expenditures](https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2024-3342?expenditure_recipient=hamilton#expenditures)

Exhibit 5: Citizens for Liberty and Labor contributions

<https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2024-3342#contributions>

Exhibit 6: Mr. Rowan Lenihan, Treasurer & Operations Director for CWAC, is also an employee of FUSE Washington.

<https://fusewashington.org/about-fuse/meet-the-team>

Exhibit 7: CWAC PDC registration: [https://apollo.pdc.wa.gov/public/registrations/registration?registration\\_id=61517](https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=61517)

Exhibit 8: CWAC statement that it's a joint project of CWAC and FUSE Votes.

<https://demandcleanwater.org/#:~:text=The%20Clean%20Water%20Accountability%20Coalition,people%20power%20to%20change%20it.>

Exhibit 9: Contributions to Molly Marshall's Campaign

<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110231985>

Exhibit 10: October 24, 2024 Spokesman Review article <https://www.spokesman.com/stories/2024/oct/23/spokane-county-commissioner-al-french-accuses-oppo/>

### **List of potential witnesses with contact information to reach them**

Vote Molly Marshall

PO Box 48505

Spokane, WA 99228

[votemollymarshall@gmail.com](mailto:votemollymarshall@gmail.com)

5092511816

Molly Marshall

Candidate

PO Box 48505

Spokane, WA 99228

[votemollymarshall@gmail.com](mailto:votemollymarshall@gmail.com)

5092511816

Don Hamilton

Owner, Hamilton Studios

1427 W Dean Ave

Spokane, WA 99201

Sean Doyle

Chair, Citizens for Liberty and Labor

PO Box 18845

Spokane, WA 99228

[citizensforlibertyandlabor@gmail.com](mailto:citizensforlibertyandlabor@gmail.com)

509-369-5580

Sabrina Kimm

Co-Chair, Citizens for Liberty and Labor

Po Box 18845

Spokane, WA 99228

citizensforlibertyandlabor@gmail.com

509-369-5580

Geoffrey Bracken

Ministerial Treasurer, Citizens for Liberty and Labor

5028 N Post St

Spokane, WA 99205

gbracken89@gmail.com

5092511816

### **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.

## Exhibits:

- **Exhibit 1:** Candidate Molly Marshall expenditures to Hamilton Studios

Link to PDC website:

[https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/3288021?expenditure\\_recipient=Hamilton#expenditures](https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/3288021?expenditure_recipient=Hamilton#expenditures)

Show  entries

[Download 9 rows as CSV.](#)

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
Hamilton Don	10/10/2024	Video Production - Paid to Hamilton Studio	Spokane	WA	\$135.00	<a href="#">View Report</a>
Hamilton Don	09/24/2024	Video Production - Paid to Hamilton Studio, Spokane WA 99201	Spokane	WA	\$365.00	<a href="#">View Report</a>
Hamilton Don	09/11/2024	Location Interview Video Production - Paid to Hamilton Studio	Spokane	WA	\$590.00	<a href="#">View Report</a>
Hamilton Studio	10/10/2024	Video Production	Spokane	WA	\$955.00	<a href="#">View Report</a>
Hamilton Studio	08/30/2024	Family portrait	Spokane	WA	\$245.00	<a href="#">View Report</a>
Hamilton Studio	06/30/2024	Videography Services for Campaign Event at County Courthouse	Spokane	WA	\$832.50	<a href="#">View Report</a>
Hamilton Studio	05/31/2024	Videography and Labor for Press Release	Spokane	WA	\$1,000.00	<a href="#">View Report</a>
Hamilton Studio	05/31/2024	Videography and Labor for Press Release	Spokane	WA	\$20.00	<a href="#">View Report</a>
Hamilton Studio	05/01/2024	Videography, Photography, Equipment, and Labor for Campaign Kickoff	Spokane	WA	\$1,180.00	<a href="#">View Report</a>

Showing 1 to 9 of 9 entries (filtered from 147 total entries)

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- **Exhibit 2:** Candidate Molly Marshall receiving a formal written warning from the PDC regarding violating RCW 42.17A.405 by accepting in-kind contributions in excess of contribution limits from Hamilton Studios.

Link to PDC website:

<https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases/155727>

### **Molly Marshall: Alleged violation of RCW 42.17A.405 for accepting over limit in-kind contributions (EY24 JUN24)**

#### **Case**

#155727

#### **Respondent**

Molly Marshall

- **Exhibit 3:** Independent expenditures made by outside groups in support of Spokane County Commissioner candidate Molly Marshall.

Link to PDC website:

[https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/3288021#independent\\_expenditures](https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/3288021#independent_expenditures)

[Download 8 rows as CSV.](#)

Name	Amount	For/Against	Itemized Expenditures
CITIZENS FOR LIBERTY AND LABOR PAC	\$16,295.31	For	<a href="#">View Report</a>
CITIZENS FOR LIBERTY AND LABOR PAC	\$7,702.00	For	<a href="#">View Report</a>
FUSE VOTES	\$2,750.00	For	<a href="#">View Report</a>
FUSE VOTES	\$82.83	For	<a href="#">View Report</a>
FUSE VOTES	\$51.66	For	<a href="#">View Report</a>
PLANNED PARENTHOOD ADVOCATES OF GREATER WASHINGTON	\$527.74	For	<a href="#">View Report</a>
PLANNED PARENTHOOD ADVOCATES OF GREATER WASHINGTON	\$117.56	For	<a href="#">View Report</a>
PLANNED PARENTHOOD ADVOCATES OF GREATER WASHINGTON	\$90.91	For	<a href="#">View Report</a>

- Exhibit 4:** Citizens for Liberty and Labor expenditures to Hamilton Studios

Link to PDC website:

[https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2024-3342?expenditure\\_recipient=hamilton#expenditures](https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2024-3342?expenditure_recipient=hamilton#expenditures)

[Download 3 rows as CSV.](#)

Recipient	Date	Description	Recipient City	Recipient State	Amount	Report
HAMILTON STUDIO	10/11/2024	Video Production for video and digital ads	SPOKANE	WA	\$2,200.00	<a href="#">View Report</a>
HAMILTON STUDIO	10/11/2024	Video production for video and digital ads	SPOKANE	WA	\$2,320.00	<a href="#">View Report</a>
HAMILTON STUDIO	10/11/2024	Discounted production costs for video and digital ads	SPOKANE	WA	\$2,000.00	<a href="#">View Report</a>

- Exhibit 5:** Citizens for Liberty and Labor contributions

<https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/committees/co-2024-3342#contributions>

Show  entries

[Download 8 rows as CSV.](#)

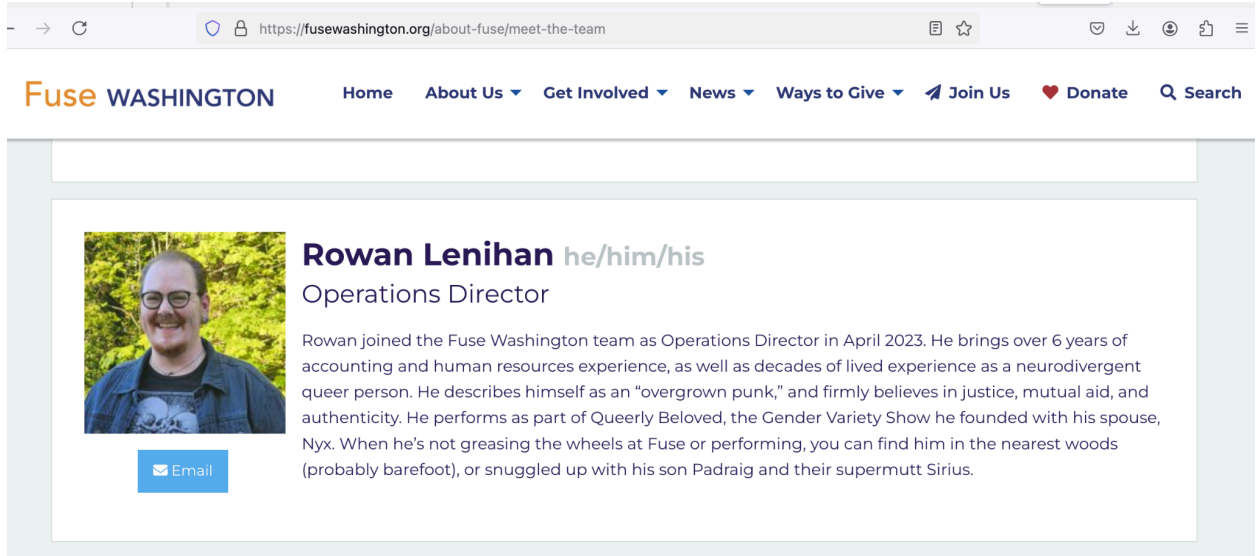
Date	Contributor	City	State	Type	Employer	Occupation	Amount	Report
10/11/2024	HAMILTON STUDIO	SPOKANE	WA	In-kind			\$2,000.00	<a href="#">View Report</a>
10/11/2024	FUSE VOTES	SEATTLE	WA	Cash			\$77,400.00	<a href="#">View Report</a>
10/09/2024	WASHINGTON CONSERVATION VOTERS ACTION FUND	SEATTLE	WA	Cash			\$15,000.00	<a href="#">View Report</a>
10/01/2024	AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES, AFL-CIO	Washington	dc	Cash			\$35,000.00	<a href="#">View Report</a>
09/30/2024	WASHINGTON STATE COUNCIL OF COUNTY AND CITY EMPLOYEES - PAC	EVERETT	WA	Cash			\$20,000.00	<a href="#">View Report</a>
09/27/2024	WASHINGTON STATE COUNCIL OF FIREFIGHTERS	OLYMPIA	WA	Cash			\$7,500.00	<a href="#">View Report</a>
09/16/2024	SPOKANE FIREFIGHTERS UNION PAC	SPOKANE	WA	Cash			\$25,000.00	<a href="#">View Report</a>
07/15/2024	SPOKANE FIREFIGHTERS UNION PAC	SPOKANE	WA	Cash			\$7,500.00	<a href="#">View Report</a>

Showing 1 to 8 of 8 entries

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- Exhibit 6:** Mr. Rowan Lenihan, Treasurer & Operations Director for CWAC, is also an employee of FUSE Washington.

<https://fusewashington.org/about-fuse/meet-the-team>



- **Exhibit 7:** CWAC PDC registration:  
[https://apollo.pdc.wa.gov/public/registrations/registration?registration\\_id=61517](https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=61517)

**Clean Water Accountability Coalition (CWAC)**

1903 S Ash St  
Spokane, WA 99203  
rowan@fusewashington.org  
360-286-3564

**Registration Filed**

Pac  
Full Reporting  
Submitted date: 09/24/2024  
Certified by rowan@fusewashington.org  
2024  
CDALC-855

**Bank Information**

Umpqua Bank  
1111 Third Ave  
Seattle, WA 98101  
To schedule books review contact rowan@fusewashington.org

**Officers**

**Rowan Lenihan**  
Operations Director  
Treasurer  
PO Box 4897  
Seattle, WA 98194  
rowan@fusewashington.org  
360-286-3564

- **Exhibit 8:** CWAC statement that it's a joint project of CWAC and FUSE Votes.  
<https://demandcleanwater.org/#:~:text=The%20Clean%20Water%20Accountability%20Coalition,people%20power%20to%20change%20it.>

SIGN UP

*This is a joint project of Clean Water Accountability Coalition & Fuse Washington.*



This website is paid for by the Clean Water Accountability Coalition. Not authorized by any candidate or candidate's committee. Address: PO Box 8423 Spokane WA 99203. Top 5 contributors: Fuse Votes. Top 3 donors to PAC contributors: Alexandra Loeb, Jerry LeClaire, Chris Stolte.

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- **Exhibit 9:** Contributions to Molly Marshall's Campaign  
<https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110231985>
- **Exhibit 10:** October 24, 2024 Spokesman Review article  
<https://www.spokesman.com/stories/2024/oct/23/spokane-county-commissioner-al-french-accuses-oppo/>

The Clean Water Accountability Coalition, the committee sponsoring the recall effort, had asked the PDC to waive the limit earlier this year, but later retracted the request just before the agency denied it because of connections between Marshall's campaign and the recall effort, as well as concerns it would provide a loophole to further violate contribution limits. In July, Fuse contributed \$500 directly to Marshall before the recall got off the ground.

"The problem is of course the intertwining of the recall with an actual contested election in which it allows you to beat the whole campaign limit (system) if you can dump all your money into the recall campaign and do it that way," PDC Commissioner Doug North said in an Oct. 3 written statement.