



State of Washington

PUBLIC DISCLOSURE COMMISSION

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August 30, 2023

Sent electronically to Joseph Gilmour at jmfgilmour91@gmail.com

Subject: Complaint regarding Ladies of Liberty Tri-Cities, PDC Case 138402

Dear Mr. Gilmour:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 2, 2023. The complaint alleged that Ladies of Liberty Tri-Cities, may have violated RCW 42.17A.205 by failing to register as a political committee.

PDC staff reviewed your allegation; the Facebook attachments provided with the complaint; the applicable statute, rule(s), and reporting requirements; the June 14, August 11 and August 28, 2023, responses to the complaint provided by Hayley Hoyt on behalf of Ladies of Liberty Tri-Cities; and other relevant information to determine whether the record supports a finding of one or more violations.

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

- The complaint alleged that Ladies of Liberty Tri-Cities, based on Facebook posts, hosted an event on May 10, 2023, and raised \$3,000 in support of Semi Bird for Governor of Washington, without registering as a political committee pursuant to RCW 42.17A.205. You attached several Facebook posts as evidence of the alleged violation.
- In its response to the complaint, received on June 14 and August 11, 2023, Ladies of Liberty Tri Cities, provided answers to written questions from staff, stating: "First of all, Ladies of Liberty is a SOCIAL GROUP that ANYONE can be a part of. We are NOT AFFILIATED with any political group. And we started this group in April of 2023. That's 2 months ago...not 2 years ago as Mr. Gilmour states. We HOSTED an event at CG Public House (aka Country Gentleman restaurant) in Kennewick for Semi Bird on May 10th. (1) The COST OF THE EVENT WAS ZERO DOLLARS. It is stated several times in our advertisement to order food **off of the restaurant menu. We did not rent the room or provide food or drink.** (2) The **Bird Campaign DID NOT give Ladies of Liberty of The High Heel Housewife any money or compensation to host this event.** Therefore there was nothing to discount. There were however donation envelopes on the tables, so if guest wanted to donate to his campaign, they simply filled out the proper envelope, and donated. These were all given to his campaign manager

to properly record and document. INDIVIDUAL donations reached \$3,000. So again, Ladies of Liberty is a social club, NOT a political group.”

- RCW 42.17A.005 defines political committee as “any person (except a candidate or an individual dealing with the candidate’s or individual’s own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition.” Based on the evidence here, it appears that Ladies of Liberty Tri-Cities neither received contributions nor made expenditures in support of a candidate or ballot proposition. The Ladies of Liberty Tri-Cities was not the receiver of contributions when they hosted a function for the Semi Bird 2024 Campaign for Governor on May 10, 2023, since envelopes were put on the tables at the function for guests to donate to the Campaign individually, if they chose to do so. The Ladies of Liberty Tri-Cities hosted a social function and invited people to come order food from the restaurant menu, and a representative of the Bird campaign was present at the function/event to accept contribution checks. Those contributions were subsequently reported by the Bird campaign.

Based on staff’s review of the complaint you submitted, the written responses provided by the respondent, and the attachments provided by the complainant, no evidence was found to substantiate a violation of RCW 42.17A.205.

PDC staff has therefore determined that, in this instance, no evidence supports a finding of a violation that warrants further investigation.

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).

If you have questions, you may contact Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/_____
Erick Agina, Compliance Officer

s/_____
Kim Bradford, Deputy Director for
Peter Lavalley, Executive Director

cc: Ladies of Liberty Tri-Cities