2024 Semi Bird for Governor Campaign response to complaints Response cut and pasted into Word document by PDC Staff PDC Case 145404

(Thu, 14 Dec 2023 at 5:43 PM) To:pdc@pdc.wa.gov

External Email

Hello Kurt,

I trust this message finds you well. I am writing to provide an update regarding the corrective actions we have undertaken in response to the concerns raised in the recent complaints. We have diligently addressed each aspect outlined in the complaints and implemented comprehensive measures to rectify any identified issues. The following summarizes the key steps we have taken in bold:

Answer: We will ensure timely and accurate filing of C-3 and C-4 reports through the 2024 election cycle by reviewing report dates in ORCA. Additionally, we are committed to depositing all monetary contributions within five business days of receipt. Lastly, our team is dedicated to maintaining the highest standards in our campaign compliance with the PDC.

Answer: All C3 reports have been updated to reflect the requested changes, thus addressing Mr. Hillard's complaint in regards to employer and occupation information. We have developed a worksheet and quality control checklist to ensure all required donor information is captured prior to submission to the campaign treasurer.

Answer: Thank you for highlighting these concerns. I want to assure you that the information gaps have been addressed, and the expenditures now include the required details. Moving forward, we have implemented robust processes to ensure comprehensive reporting of all details for future expenditures.

Answer: In the rare instances where party preference was not displayed, we have taken immediate action on all Semi Bird for Governor political advertisements to ensure that they include either the "R" for the Republican party, or have the word "Republican" spelled out as specified in the Candidate Registration. This correction has been applied to various forms of political advertisements, including radio and television ads, yard signs, billboards, and other campaign paraphernalia. Additionally, all online platforms, including the Campaign website, Campaign Facebook page, and other social media sites, as well as future Google and Facebook ads/boosted posts, now accurately reflect the party preference.

Answer: To enhance our compliance with PDC reporting requirements, the campaign will implement a set of robust internal controls and practices. These measures include:

- 1. Regular Audits: Conduct quarterly internal audits to review financial records, ensuring accuracy and completeness in PDC reporting.
- 2. Staff Training: Providing comprehensive training to campaign staff on PDC regulations and reporting obligations to foster a culture of awareness and compliance.

- 3. Designated Compliance Officer: Appointing a dedicated Compliance Officer to oversee and enforce adherence to PDC guidelines, serving as a central point of contact for reporting-related matters.
- 4. Checklists: Implement internal processes in which checklists are utilized to ensure attention to detail and facilitate PDC compliance.

Answer: I can confirm that these issues have been promptly addressed and corrected. Upon closer examination, we found the campaign did not exceed contribution limits, and that there were simple explanations, as in the case of the first allegation, which involved Father & Son donors with identical names.

The final two allegations have been clarified. One pertained to a duplicate entry error concerning the reporting of donations, while the other involved the misclassification of an individual family donation. Both issues have been rectified.

In summary, I want to assure you that we have taken swift and comprehensive actions to address the concerns raised in the complaints. Moving forward, with the controls that we have implemented, including regular audits, staff training, and other efficiency mechanisms, I am confident that this campaign will be able to ensure strict adherence to all PDC reporting requirements.

I appreciate your guidance throughout this process, and I am committed to upholding the highest standards of transparency and compliance within our campaign.

Best regards,



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