



State of Washington  
PUBLIC DISCLOSURE COMMISSION  
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February 13, 2024

Sent electronically to the 2024 Semi Bird for Governor Campaign

Subject: Complaints filed by Dan Hillard, Daniel Hodun, and Robert Parker, PDC Case 145404

Misipati Semi Bird and the 2024 Campaign for Governor:

Below is a copy of an electronic letter sent to Dan Hillard, Daniel Hodun, and Robert Parker concerning the complaints they filed with the Public Disclosure Commission (PDC) against your 2024 Campaign for Governor of the State of Washington.

As noted in the letter to the three complainants, the PDC will not be conducting a more formal investigation into these allegations or taking any enforcement action in this matter.

However, pursuant to WAC 390-060(1)(d), your 2024 Campaign for Governor is receiving this formal written warning concerning the failure to: (1) timely and accurately disclose expenditure details such as the number of mailers printed or yard signs produced on the C-4 reports; (2) timely disclose the Employer and Occupation information for monetary contributions received from individuals above the disclosure threshold on the C-3 reports; (3) timely deposit monetary contributions within five business days of receipt; and (4) include the party preference on political advertising sponsored by the Campaign. The warning includes staff expectation that the Campaign will timely and accurately file C-3 and C-4 reports for the remainder of the 2024 election cycle and will include the party preference on all future political advertisements sponsored by the Campaign.

The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws/rules. Based on this information, the PDC has dismissed the allegations in these complaints by the three of you in accordance with RCW 42.17A.755(1).

If you have questions, you may contact PDC staff member Kurt Young by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by:

s/\_\_\_\_\_  
Electronically Signed Kurt Young,  
Compliance Officer

s/\_\_\_\_\_  
Electronically Signed Peter Frey Lavalée  
PDC Executive Director



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February 13, 2024

Sent electronically to Dan Hillard, Daniel Hodun, and Robert Parker

Subject: Complaints filed against 2024 Semi Bird for Governor, PDC Case 145404

Dan Hillard, Daniel Hodun, and Robert Parker:

The Public Disclosure Commission (PDC) has completed its review of the multiple complaints that you filed. The complaints filed by the three of you have been combined into one complaint resolution letter to more efficiently use PDC Compliance staff resources. The complaints alleged that Misipati Semi Bird, a candidate for Governor in the State of Washington in 2024, may have violated the following:

- RCW 42.17A.220 by failing to timely deposit monetary contributions into the campaign bank account within five business days of receipt.
- RCW 42.17A.235 and .240 by failing to timely and accurately file Summary Full Campaign Contributions and Expenditures Reports (C-4 reports) and Monetary Contributions Reports (C-3 reports) disclosing contribution and expenditure activities, that included: (1) filing a number of C-3 and C-4 reports late; (2) not providing the required Employer and Occupation information for individuals making monetary and in-kind contributions above the reporting threshold (see also WAC 390-16-034); (3) missing expenditure details for political advertising such as the number of signs, mailers, or bumper stickers printed; and (4) lacking the sub-vendor breakdown information for other expenditures in which the goods or services were sub-contracted out to another party.
- RCW 42.17A.320 by failing to include the party preference Semi Bird selected on his Candidate Registration for several political advertisements sponsored by his Campaign.
- RCW 42.17A.405 by receiving contributions that exceeded the 2024 contribution limits for a Gubernatorial Campaign.

PDC staff reviewed your complaints and allegations; the attachments you all provided with the complaints; the applicable statutes, rule(s) and reporting requirements; the C-3 and C-4 reports filed by 2024 Semi Bird for Governor Campaign (Campaign); the responses to the complaint provided by Matt Brown, former Campaign Advisor, and Russ Vandersnick, current Campaign Manager; 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:

- On November 12, 2022, Misipati Semi Bird filed a Candidate Registration with the PDC declaring his candidacy for Governor of the State of Washington in 2024, selecting the Full Reporting option, and initially listing the candidate as Treasurer. The Campaign filed seven amended Candidate Registrations between November 28, 2022 and January 4, 2024, listing different Campaign officers and information.

- On January 22, 2024, the Campaign filed an Amended Candidate Registration listing Kellie Crabb as Treasurer.

Allegation – Failure to timely and accurately file C-3 and C-4 reports providing the required Employer and Occupation for individuals contributing above the threshold for disclosure and providing the required expenditure details (RCW 42.17A.235 and .240):

- PDC staff’s review of the Campaign filings found that between December 27-28, 2023, the Campaign filed 26 amended C-3 and C-4 reports to address the allegations listed in the multiple complaints that were related to this matter, providing the required contribution and expenditure information. In addition, the Campaign filed four amended C-4 reports on January 10, 2024, providing additional corrected information.
- The Campaign stated in their responses that they filed amended C-3 reports to update the contributor information *“to reflect the requested changes, thus addressing Mr. Hillard's complaint in regards to employer and occupation information.”* The Campaign has *“developed a worksheet and quality control checklist to ensure all required donor information is captured prior to submission to the campaign treasurer”* to file the C-3 reports more accurately. Staff queried, downloaded, and reviewed the Campaign’s contributors from the PDC contribution database, and this information verified the Campaign filed amended C-3 reports disclosing updated contributor Employer and Occupation information for the individuals identified in the complaint. Staff noted that several of the individual contributors made multiple contributions and that the earliest contributions did not meet the threshold for providing the Employer and Occupation information, and those C-3 reports were not amended.
- The amended C-4 reports filed by the Campaign provided the required expenditure details and sub-vendor breakdowns for expenditures made to third party subcontractors. The Campaign stated that *“even though all C-4 reports filed had a description of the expenditure, we have updated each item to reflect additional expenditure details, to include the specific number/amount of an item(s) purchased.”* Staff reviewed the amended C-4 reports filed by the Campaign concerning the updated expenditure details, and verified the Campaign provided the required information such as the number of signs produced, or mailers/flyers printed.

Allegation – Failure to include the party preference on political advertising sponsored by the Campaign (RCW 42.17A.320):

- The Campaign response stated: *“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.”* The corrective action taken by the Campaign was applied to all forms of political advertisements that included radio and television broadcast ads, yard signs, billboards, and other campaign related paraphernalia. In addition, the Campaign reviewed all online platforms that included 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.”*

Allegation – Exceeding contribution limits and spending general election contributions prior to the primary election being held (RCW 42.17A.405):

- The Campaign stated that after a “closer examination, we found the campaign did not exceed contribution limits.” The Campaign stated concerning the first allegation that it involved contributions received from a father and son, and that both were contributors who shared “identical names.” The Campaign stated the remaining two allegations of exceeding contribution limits “have been clarified” and that one issue involved “a duplicate entry error concerning the reporting of donations, while the other involved the misclassification of an individual family” contribution that had been received. The Campaign stated that both issues have now been rectified and reiterated that the *“campaign did not spend ‘general election’ funds for the ‘primary election.’”*

Allegation – The Campaign failed to timely deposit monetary contributions into the campaign bank account within five business days of receipt.

- One of the complaints alleged that the Campaign received 19 monetary contributions but had failed to timely deposit those contributions within five business days of receipt into the Campaign bank account as required by statute. The 19 contributions listed in the complaint were deposited between 1 to 39 days late, involved monetary contributions that were received between December 8, 2022, through October 14, 2023, and deposited by the Campaign for amounts that varied between \$30 to \$250.
- The Campaign stated they are aware of the requirement to timely deposit contributions into the Campaign bank account or depository. The responses to the complaints stated that the Campaign is “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.”

Allegation – The Campaign failed to disclose an advertisement in the Kitsap County publication the “Coffee News” and no expenditures have been reported for the candidate undertaking a podcast (RCW 42.17A.240):

- The Campaign stated there were no expenditures made to purchase an advertisement in the Coffee News, and that the advertisement in question *“was an in kind donation that was recorded with the PDC on 11-30-23.”* With regards to the podcast, the Campaign stated that prior to running for office, Semi Bird *“specialized in training and development”,* that the *“podcast studio is located in the candidate’s home, therefore there is no studio cost. The software to run the podcast was a free download, therefore there is no production cost. Any equipment used for the podcast was owned by the candidate.”*
- The Campaign stated that, *“to enhance our compliance with PDC reporting requirements, the campaign will implement a set of robust internal controls and practices,”* and that those measures will address the allegations listed in your complaints concerning the timely filing of C-3 and C-4 reports, the timely depositing, within five business days, of contributions received, timely providing the Employer and Occupation information for certain contributions received, and expenditure details, particularly for political advertising.
- Those internal control measures include the following: (1) Regular Audits: The Campaign will conduct internal audits to review the financial records and books of account to ensure the accuracy and completeness of the PDC reports filed. (2) Staff Training: The Campaign will provide training to staff concerning PDC regulations and reporting requirements *“to foster a culture of awareness and compliance.”* (3) Designated Compliance Officer: The Campaign will appoint *“a dedicated Compliance Officer to oversee and enforce adherence to PDC guidelines.”* (4) Checklists: The Campaign will implement internal controls and processes that will involve the use of *“checklists”* to ensure the required attention to the PDC reporting requirements and to facilitate compliance with the PDC filing requirements.
- Finally, staff’s review found two other complaints had been filed against the Campaign that included PDC Case 138400, a complaint filed on June 2, 2023; and PDC Case 115351, a complaint filed on December 15, 2022. Both matters/cases were resolved with a Formal Written Warning letter being issued, for minor violations of RCW 42.17A.235 and .240 as follows: (1) Case 138400: the warning was for failing to timely disclose pledges received from individuals at an event hosted by the Ladies of Liberty Tri-Cities; and (2) Case 115351: the warning was for failing to timely file the initial C-3 and C-4 reports disclosing a \$6,000 contribution received from Semi Bird to start his Campaign.

Based on these findings, that included the Campaign initiating stronger internal controls to ensure Compliance with the PDC reporting requirements, staff determined in these instances, the Campaign’s failure to timely and accurately disclose expenditure details, the Employer and Occupation information for monetary contributions received from individuals on the C-3 and C-4 reports, and for failing to include the party preference on some political advertising sponsored by the Campaign, were not violations that warranted further investigation or enforcement action.

In addition, staff found no evidence that the Campaign exceeded contribution limits or spent general election contributions for the 2024 primary election. Staff reviewed the facts and findings concerning the two warning letters sent to the Campaign for alleged violations of RCW 42.17A.235 and .240 and took those findings into consideration when determining the proper resolution for the allegations listed in your complaints.

Staff determined the two prior warning letters were mitigated by the following facts: (1) the late filed initial C-3 and C-4 reports filed by the Campaign only listed a \$6,000 personal contribution from the candidate, and that information was disclosed more than 550 days before the August 2024 primary election; (2) concerning the failure to timely disclose pledges for future monetary contribution not yet received, those funds were not available for use by the Campaign, and the funds were received from individuals in attendance at a single event and ultimately disclosed well in advance of the election; and (3) the Campaign is for a statewide office and has received a total of \$316,385 in monetary and in-kind contributions that included 1,151 separate contributions totaling \$309,401, plus 32 of the C-3 reports filed disclosed small contributions totaling \$6,984. In addition, the Campaign disclosed \$300,032 in total expenditures made through December 31, 2023.

Pursuant to WAC 390-060(1)(d), the 2024 Semi Bird for Governor Campaign will receive a formal written warning concerning the failure to: (1) timely and accurately disclose expenditure details such as the number of mailers printed, or yard signs produced on the C-4 reports; (2) timely disclose the Employer and Occupation information for monetary contributions received from individuals above the disclosure threshold on the C-3 reports; (3) timely deposit monetary contributions within five business days of receipt; and (4) include the party preference on political advertising sponsored by the Campaign. The warning includes staff expectation that the Campaign will timely and accurately file C-3 and C-4 reports for the remainder of the 2024 election cycle and will include the party preference on all future political advertisements sponsored by the Campaign.

The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws/rules. Based on this information, the PDC finds that no further action is warranted and has dismissed the allegations in these complaints by the three of you in accordance with RCW 42.17A.755(1).

If you have questions, you may contact PDC staff member Kurt Young by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

Sincerely,

Endorsed by:

s/ \_\_\_\_\_  
Electronically Signed Kurt Young,  
Compliance Officer

s/ \_\_\_\_\_  
Electronically Signed Peter Frey Lavalley  
PDC Executive Director



cc: 2024 Semi Bird for Governor Campaign