



**Bob Ferguson**  
**ATTORNEY GENERAL OF WASHINGTON**

Campaign Finance Unit  
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*Delivery by electronic mail*

*Corrected*

February 28, 2017

Glen Morgan  
1001 Cooper Point Road SW #140-222  
Olympia, WA 98502  
[glenmorgan89@gmail.com](mailto:glenmorgan89@gmail.com)

Kelsey Hulse  
PO Box 3623  
Lacey, WA 98509

**RE: Citizen Action Notice – Kelsey Hulse (2), (3), (4)  
Notification of Results**

Dear Ms. Hulse and Mr. Morgan:

I am writing to advise you of the results of the Attorney General's Office's review of the three citizen action notices identified above and received from Glen Morgan alleging violations of the state campaign finance disclosure laws contained in RCW 42.17A by the Hulse 2016 election campaign. In those notices, Mr. Morgan made numerous allegations concerning disclosure deficiencies by the campaign. Each of these notices was first filed with the state Public Disclosure Commission.

The AGO reviewed the notices and any attachments, responses received from the campaign, and information from the PDC website. This review revealed that most of the allegations could not be substantiated or under the facts as alleged did not constitute violations of the law. Those included the alleged personal use of campaign funds, failure to name an opponent's party preference in political advertising, failure to include sponsor identification, and failure to include accurate description of vendor's services. Because of the lack of evidence to support these claims, the State is exercising its prosecutorial discretion and not filing a lawsuit related to them.

With regards to the allegations involving the production of Ms. Hulse's campaign video ads, the State's review revealed sufficient evidence to support a judicial enforcement case on the claims related to the video ads made in the Hulse (2), Hulse (3), and Hulse (4) notices. As such, today the State initiated a lawsuit against Ms. Hulse on those allegations.

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Please note that this view is limited to the specific facts in your notice, the enforcement action already taken against Ms. Hulse, and expresses no opinion as to the application of the law to any situations other than those alleged in the citizen action notice.

If you have further questions, please contact my office. Thank you.

Sincerely,



LINDA A. DALTON

Senior Assistant Attorney General

LAD:kj

Enclosure

cc: Darwin Roberts, Deputy Attorney General  
Elizabeth Petrich, Thurston County Prosecuting Attorney's Office  
Evelyn Fielding Lopez, Executive Director – Public Disclosure Commission