

[Jacob Berkey](#) added a private note 3 months ago (Tue, 22 Nov, 2016 at 6:30 AM)  
Merged from ticket [9834](#)

**Subject:** PDC complaint re: Sam Hunt for Senate

**Description:**

Jacob, please find below the response to the complaint filed by Glen Morgan:

November 18, 2016

Jacob Berkey  
Public Disclosure Commission

Dear Mr. Berkey:

This is in response to a complaint filed against the Sam Hunt for State Senate campaign on October 25, 2016. My treasurer and I are fully committed to proper and timely reporting of campaign donations. In eight years as a for school board member and 16 years in the Legislature, this is the only complaint that has been filed against my campaign. That is a very strong record of compliance.

Let me start by saying that the nit-picking issues raised in the complaint are minuscule in nature and had no impact on the outcome of my campaign. None of them would have had an impact even in a hotly contested race. They were filed by someone who evidently has little knowledge of campaign finance laws and PDC requirements.

I will respond to each complaint:

1. Failure to include sponsor identification on his website.

The PDC “Political Advertising Guidelines” specifically state that electioneering communications “does not apply to websites.” There is no violation here. The website was created by volunteer labor at no cost to the campaign. It is clearly identified as supporting Sam Hunt for State Senate, District 22 Democrat.

2. Failure to use codes for expenses.

There is no violation here. Evidently the person filing the complaint does not understand plain English. The instructions on the C-4 form clearly state “If one of the following codes is used to describe an expenditure, no other description is needed.” He apparently does not understand the meaning of “if.” A candidate is not required to use the codes, and, in fact, very few candidates use the codes. Instead, they provide a description of the expenditure in the “Purpose of Expense and/or Contribution” column. That is what my campaign did for each item during the campaign. We chose to use cleared, more detailed explanations of each expense so voters would know exactly what was being purchased.

3. Failure to accurately list expenditures.

I guess I have to plead guilty to this one. There is a misspelling of Washington State Historical Society. Obviously, this was a typographical error and was in no way an attempt to hide anything.

4. Failure to list the employer and occupation of an in-kind contributor.

There is no violation here. Helen Carlstrom is “retired” and there is no requirement to list a person as retired

5. Failure to accurately list the accurate employer and occupation of a contributor.

There is no violation here. Being a candidate is not an occupation. Laurie Dolan is, in fact retired and being a candidate for the Legislature is not an occupation.

6. Failure to accurately list campaign debt.

There is no violation here; the expenditures were promptly paid when invoices were received. The postage cost was reported on the 10/17 C4 as it was invoiced and paid prior to the end of the report period. The mailing was not bid. The printer printed and mailed the pieces prior to issuing a bill. The campaign accurately disclosed to full cost of the mailing. However, we could not pay for the printing until we received the bill from the vendor. Any reasonably intelligent person could figure out that an item listed “mailer postage” meant that material was to be mailed. The printer is required to collect postage before any item is mailed. However, there is no prohibition against mailing a bill for printing after the mailing has been sent. Obviously, right before the primary is a very busy time for my printer, and the bill was not instantly transmitted due to the volume of items printed by the state’s largest campaign printer. The bill for printing was promptly paid and filed at the next C-4 deadline. This was not some effort designed to gain an edge by the element of surprise. In fact the more telling bill is the bill for postage, since this would give any reasonably intelligent researcher a clear picture of the number of pieces mailed.

As you can see, the complaints filed are without merit and do not constitute violations of the PDC laws or rules. I urge the commission to give them the treatment they deserve by dismissing all six complaints.

Sam Hunt

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