

Kelsey replied a month ago (Wed, 2 Nov at 5:07 PM)
to : pdc@pdc.wa.gov , cc : josie@bluewavepolitics.com

Re: Alleged violations of RCW 42.17A.205, .235, .240, and .700

To Whom It May Concern:

This email responds to the complaint from Mr. Glen Morgan that the Commission received on Tuesday, October 18. Mr. Morgan alleges that my campaign has violated certain registration and reporting requirements. As a first-time candidate, I have tried my best to comply with all applicable legal requirements and to ensure that my campaign has done the same. Below I address each of the alleged violations identified in Mr. Morgan's complaint.

1a. Reporting of occupation and employer information for a cumulative donation over \$100.

My campaign has been filing C3 reports on a weekly basis and to date has filed over 75 such reports. During that time, Ms. Laurie Dolan has donated twice to my campaign. Ms. Dolan first donated \$100 on April 1, 2016. Ms. Dolan later donated another \$100 on August 16, 2016. Unfortunately, Ms. Dolan's occupation and employer information was not listed in the C3 report that was filed for her second contribution, due to an administrative error.

The campaign uses a software program called "NGP" to compile contribution information and electronically file C3 reports. On occasion, due to informational discrepancies, NGP might not recognize that two contributions have come from the same person. To account for that possibility, my campaign's Treasurer separately searches and reviews all contribution information for accuracy and completeness. This includes a search for duplicate contributors, to ensure compliance with aggregate contribution limits and reporting thresholds. Whenever a duplicate contributor is newly identified during this process, that person's contributions are then "merged" within NGP and any necessary adjustments are made to the campaign's reports.

In the case of Ms. Dolan, NGP did not recognize that her two contributions came from the same person. The Treasurer discovered this oversight and merged Ms. Dolan's contributions within NGP on September 9, 2016 (see attached screenshot). At that time, the Treasurer confirmed that Ms. Dolan had not exceeded the applicable contribution limit. The Treasurer did not realize, however, that NGP had failed to include Ms. Dolan's occupation and employer information—which had been collected—in either of the C3 reports that identified her contributions.

We appreciate the opportunity to correct this administrative error. The C3 report with Laurie Dolan's second contribution will be amended to show her employer and occupation. We have further reviewed our records and have not identified any other instance in which the occupation and employer information for a contributor was inadvertently omitted. We did find multiple examples of cumulative contributions that triggered the reporting requirement for which occupation and employer information was provided (e.g., contributions from Linda Bremer and Elsa Bruton).

1b. Display of "00000" as zip code.

The PDC's website is listing the zip code of various contributors to my campaign as "00000." We have reviewed the underlying reports filed with the PDC and have found that each contributor's actual zip code was reported. In other words, there appears to be an administrative error occurring on the PDC's website. Please let us know if there is anything we can do to assist with correcting this error or preventing it from occurring in the future.

2. Reporting professional photography as an in-kind donation.

On May 25, 2016, I paid \$175 to a professional photographer for some photographs of myself (see attached receipt). At that time, I had no current professional photos of myself. I made this purchase with the intent of using the new photographs for various purposes on an ongoing basis, including for use in my campaign, for my social media profiles, and for speaking, employment, and volunteer bios. When I made the purchase I did not consider it a campaign expense. I did provide the photos to my campaign for use in our web pages and mailers. Thus, to err on the side of disclosure, we will amend the relevant C4 report to include the photographs as an in-kind donation from me to the campaign, valued at 50% of the total cost that I paid for them (\$87.50).

3. Reporting purchase of web domain name.

On March 6, 2016, I purchased a number of web domain names through GoDaddy.com for \$71.67, including "kelseyhulse.com," "kelseyhulse.us," "kelseyhulse.net," "kelseyhulse.org," and "kelseyhulse.info" (see attached receipt). At the time, I was considering but had not yet decided on a run for office. I wanted to reserve those domains, both in case I decided to run, and because I planned to use some or all of those addresses for a personal site regardless. (I had maintained a personal website in the past and wanted to do so again.)

When I purchased the domains, I did not consider it a campaign expense. I had no campaign at that time. Only later did I commit to running for office, begin to form a committee, and start my campaign. Ultimately, the campaign began using one of my previously purchased domain names on April 7, when the campaign's website went live at "kelseyhulse.com" (see attached correspondence). I still plan to use some or all of my domain names for a personal website after the election. To err on the side of disclosure, we will amend the relevant C4 report to include the domain as an in-kind donation from me to the campaign. We will report the full cost that I paid for the relevant domain (\$27.34) to ensure the amount is reportable and transparent.

We have already reported the \$2500 that the campaign spent to update the website design in July of 2016. (The original website design was developed by the general consultant of the campaign using NGP software.) This update expense was totally separate from the \$27.34 that I previously paid to obtain the "kelseyhulse.com" domain name.

4 and 5. Filing C1 and F1 reports.

As explained above, I purchased the domain name "kelseyhulse.com" at a time when I was not yet committed to running for office. I was reserving the domain name in case I decided to run and for other personal reasons. I did not consider this campaign spending, as I had no campaign yet. I do not think this triggered the requirements to file a C1 and F1 report.

Thank you for the opportunity to address Mr. Morgan's complaint. Please let us know if there is any further information we can provide.

Sincerely,

Kelsey Hulse



Josie Olsen <josie@bluewavepolitics.com>

Donation Page for Friends of Kelsey Hulse

Phil Gardner <phil@orcaorganizing.com>
To: Josie Olsen <josie@bluewavepolitics.com>

Thu, Apr 7, 2016 at 2:40 PM

It wasn't, but now it is. Fun phone calls with tech support

On Apr 7, 2016, at 2:19 PM, Josie Olsen <josie@bluewavepolitics.com> wrote:

Is Kelsey's website up and running? I think the page is mostly good to go, but we need to do something with the url to make it work correctly.

----- Forwarded message -----

From: **Elizabeth Pedraja** <EPedraja@ngpvan.com>
Date: Thu, Apr 7, 2016 at 2:09 PM
Subject: RE: Donation Page for Friends of Kelsey Hulse
To: Josie Olsen <josie@bluewavepolitics.com>

Josie-

It is appearing in the wrapper of your website, something that we set up for all our website clients.

If you want it to be a standalone page, you would need to remove the ngpvanhost portion of the url and replace it with act.myngp. So a new url would be something like act.myngp.com/form/11222333445566 (or whatever your form ID is). You can do that until you have customized the site to your liking.

Best,

Elizabeth Pedraja

Deputy Director of Client Services, NGP VAN

P. 202.686.9330 | E. support@ngpvan.com

From: Josie Olsen [mailto:josie@bluewavepolitics.com]
Sent: Thursday, April 07, 2016 4:46 PM
To: Support <support@ngpvan.com>
Subject: Donation Page for Friends of Kelsey Hulse

Hi there,

I built a contribution page for the campaign website, however when I publish it, it goes to a template/placeholder page. I'm not sure what I did incorrectly but some help would be much appreciated.

<https://kelseyhulse.ngpvanhost.com/form/6181135506240375552>

Thank you,

--

Josie Olsen

Blue Wave Political Partners, LLC.

119 1st Ave South, Suite 320, Seattle, WA, 98104

Work: [\(206\) 682-7328](tel:2066827328)

<image001.jpg>

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Josie Olsen

Blue Wave Political Partners, LLC.

119 1st Ave South, Suite 320, Seattle, WA, 98104

Work: [\(206\) 682-7328](tel:2066827328)



Phil Gardner
Founder and Principal
Orca Organizing

[253-226-7137](tel:2532267137)
phil@orcaorganizing.com

Merge History



Date Merged



Contact Id

Display Name

09/06/2016 3:16 PM

VSJ0ACF2ZH0

Laurie Dolan

Restore

10



Page 1 of 1



Displaying 1 to 1 of 1 Merge History Entries

[Close window](#)



Josie Olsen <josie@bluewavepolitics.com>

Fwd: Receipt from Cortney Kelley Photography

Kelsey Hulse <kelseyhulse@gmail.com>
To: Josie Olsen <josie@bluewavepolitics.com>

Wed, Oct 19, 2016 at 3:07 PM

Here is the receipt from the photographer.

Thank you!
Kelsey

----- Forwarded message -----

From: **Cortney Kelley Photography via Square** <receipts@messaging.squareup.com>
Date: Wed, May 25, 2016 at 10:28 AM
Subject: Receipt from Cortney Kelley Photography
To: kelseyhulse@gmail.com

Things just got easier.

Now when you shop at sellers who use Square,
your receipts will be delivered automatically.

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Cortney Kelley Photography



How was your experience?

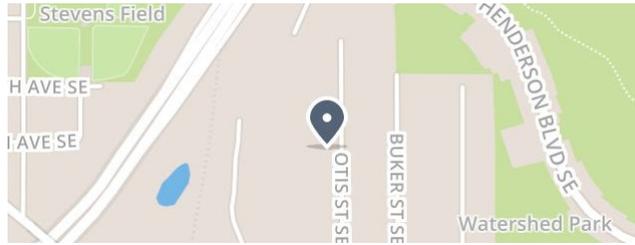


\$175.00

Custom Amount \$175.00

Total \$175.00

Kelley



Cortney Kelley Photography

Visa 4838

5/25/2016, 10:27 AM

VISA

#zwxO

KELSEY L HULSE

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Josie Olsen <josie@bluewavepolitics.com>

Fwd: Kelsey, your order confirmation is inside

Kelsey Hulse <kelseyhulse@gmail.com>
To: Josie Olsen <josie@bluewavepolitics.com>

Tue, Oct 25, 2016 at 11:36 AM

Hi Josie!
I bought the domain extremely early (and have owned it in the past, actually) before there was any plan to run.

Thanks,
Kelsey

----- Forwarded message -----
From: **GoDaddy** <donotreply@godaddy.com>
Date: Sun, Mar 6, 2016 at 9:48 PM
Subject: Kelsey, your order confirmation is inside
To: kelseyhulse@gmail.com



24/7 Support: (480) 505-8877
Kelsey Hulse — Customer Number: 124096779

Thank you.

Here's your confirmation for order number 946937116. Review your receipt and get started using your products.

| Product | Quantity | Term | Price |
|--|----------|---------|---------|
| .COM Domain Registration kelseyhulse.com Manage | 1 Domain | 2 Years | \$27.34 |
| .US Domain Registration kelseyhulse.us Manage | 1 Domain | 2 Years | \$20.99 |
| .NET Domain Registration kelseyhulse.net Manage | 1 Domain | 1 Year | \$6.18 |

| | | | |
|---|----------|---------|----------------|
| .ORG Domain Registration kelseyhulse.org Manage | 1 Domain | 1 Year | \$10.18 |
| .INFO Domain Registration kelseyhulse.info Manage | 1 Domain | 1 Year | \$1.18 |
| Microsoft Office 365 Email - FREE Month Get Started | 1 User | 1 Month | \$0.00 |
| Subtotal: | | | \$65.87 |
| Tax: | | | \$5.80 |
| Total: | | | \$71.67 |

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NOTE: Unless you have specifically selected the manual renewal option, your purchase includes enrollment in our automatic renewal service. This keeps your products up and running by automatically charging the then-current renewal fees to your payment method on file just before they're set to expire, with no further action on your part. You may cancel this service at any time by turning off the auto-renewal feature in your GoDaddy account.

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