



State of Washington

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908

(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

March 28, 2018

Delivered electronically to Glen Morgan at “glenmorgan89@gmail.com”

Subject: Complaint filed against Kelsey Hulse (1), PDC Case 9016

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 18, 2016. Your complaint alleged that that Kelsey Hulse, a candidate for Thurston County Commissioner in 2016, may have violated RCW 42.17A.205, .235, .240, and .700 by failing to timely file a Candidate Registration (C-1 report) and Personal Financial Affairs Statement (F-1 report) within two weeks of declaring her candidacy, and for failing to timely disclose contribution and expenditure activities undertaken by her 2016 campaign.

PDC staff reviewed your allegations and as a result of our review, we found the following:

- On April 1, 2016, Kelsey Hulse filed a Candidate Registration (C-1 report) declaring her candidacy for Thurston County Commissioner, Position #2 in 2016, and selecting the Full Reporting Option. Ms. Hulse was a first-time candidate for public office.
- Allegation #1: Failure to report occupation and employer information for a contributor, and the zip codes for some contributors and vendors. Ms. Hulse stated in her response, that the Campaign uses a vendor kit from NGP to electronically file the Monetary Contribution report (C-3 reports) and Summary Campaign Contribution and Expenditure reports (C-4 reports) with the PDC. The campaign failed to properly aggregate two \$100 contributions received from two \$100 contributions received from Laurie Dolan in April and August of 2016, so the Campaign failed to provide the employer and occupation information for Representative Dolan.

Concerning the zip code issue, Ms. Hulse stated that when the Campaign filed the reports electronically, there was an issue with the PDC website that when the a campaign reports was filed, the zip codes that were previously entered by the Campaign, changed the zip code data into a series of five zeros (00000) on a few reports.

- Allegation #2: Failure to report “professional photography” as an expense of in-kind contribution. Ms. Hulse stated in May of 2016, she used \$175 om personal funds to pay a photographer to take some photographs of her. She stated that at the time, she had no professional photographs of herself, and that she made the expenditure so she could use the photographs for a variety of purposes, including to be used for her campaign, her social media profiles, speaking engagements, and employment. She stated that at the time she did not consider the expenditure to be campaign related, but that she filed an amended C-4 report prior to the election, disclosing an \$87.50 in-kind contribution for the photographs which were used on the campaign website and in mailers.

- Allegation #3: Failure to disclose the purchase of a Campaign domain name. On March 6, 2016, Ms. Hulse purchased five different domain names, that included one the campaign eventually ended up using (kelseyhulse.com). She stated that when she purchased the domain names, she “did not consider it a campaign expense” but her campaign filed an amended C-4 report disclosing a \$27.34 in-kind contribution from her to the campaign for the domain name.
- Allegations 4 and 5: Failure to timely file a C-1 report and a Personal Financial Affairs Statement (F-1 report) within two weeks of becoming a candidate and making the expenditure for the domain name. Ms. Hulse stated that when she purchased the domain names in early March, she had not made a decision whether or not she was going to run for office, and she did not consider the expense as a campaign expenditure since there was no campaign at that time. Staff noted that Ms. Hulse filed her C-1 report on the date she received her first two contributions, a \$250 contribution from the candidate’s personal funds, and a \$100 contribution from Laurie Dolan, both received on April 1, 2016.

Based on these findings, staff has determined that in this instance, there is no evidence that supports a finding of a material violation warranting further investigation. The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

If you have questions, you may contact Kurt Young by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

/s _____
Kurt Young
PDC Compliance Officer

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Kelsey Hulse