

(PDC complaint filed 12/19/2016)

To whom it may concern,

In an earlier response (attached) to a PDC complaint I filed against him, Mr. Hunt notes that he has a very strong record of compliance, which is not entirely accurate.

For that reason, I wanted to attach memorandum the PDC sent to Mr. Hunt on 10/10/2003, noting that his campaign used incorrect reporting periods and election years when filing their C4s electronically.

I understand that this occurred a long time ago, but I believe that it is part of a larger pattern of noncompliance.

However, I do agree with Mr. Hunt's assertion that I "...evidently has little knowledge of campaign finance laws and PDC requirements." I am doing my best to become more educated, and I apologize for missing the following violations by Mr. Hunt in my original complaint from October. I am attempting to rectify my failures to report these complaints in October with this complaint today.

It has come to my attention that Sam Hunt has committed additional violations of RCW 42.17A in his campaign for the Washington State Senate.

1) Accepting over-limit contributions from the Nisqually Indian Tribe. Failure to accurately identify contributors. (Violation of RCW 42.17A.405 & .235)

On 12/10/2015, the Nisqually Indian Tribe made a primary election contribution of \$950.00 to Sam Hunt.

On 7/6/2016, the Nisqually Indian Tribe made a primary election contribution of \$1050.00 to Sam Hunt.

In both of these instances, Sam Hunt failed to spell Nisqually correctly, but I have chosen to merely point out the spelling error rather than identify it as a separate and independent violation of the disclosure rules.

Cumulatively, the Nisqually Indian Tribe's donation to Sam Hunt exceeds the primary election contribution limit by exactly \$1000.

2) Illegal donation to the Washington State Democrat Party. (Violation of RCW 42.17A.430 (8))

On 6/18, Sam Hunt paid \$250 for "Event Sponsorship for State Party".

This expenditure constitutes an illegal donation to a political party, in violation of RCW 42.17A.430 (8). There was no tangible benefit to Hunt's campaign for this expenditure.

While Hunt is allowed to pay market value for objects of real value (like food) to political parties, he is prohibited from transferring funds to them in excess of that amount.

If this requirement did not exist, then committee event hosts could artificially inflate the cost of event entry to whatever price was desired as a donation, thereby completely bypassing the provisions of RCW 42.17A.430 (8).

3) Failure to report expenditure or in-kind contribution. (Violation of RCW 42.17A.235)

In his campaign, Hunt sent out multiple mailers to registered voters within Thurston County.

He used mailing lists to target specific voters in an effort to win the maximum number of voters per dollar spent.

Mailing lists have real market value, and many candidates actually pay hundreds of dollars for mailing lists from vendors such as L2.

Unfortunately, because Hunt failed to report the expenditure for said mailing lists, or the in-kind contribution of mailing lists from some outside entity, he is in violation of RCW 42.17A.235. Hunt must amend his reports to include the source of his mailing lists, either as an in-kind contribution to his campaign or as an expenditure.

4) Failure to identify party preference in written political advertising. (Violation of RCW 42.17A.320 (1))

In two instances, Sam Hunt's paid political advertisements in the Thurston County Democratic Party newspaper fail to identify Hunt's partisan affiliation.

Hunt must have gone out of the way to remove "Democrat" from the sign in these two pieces of political advertisement, because in seemingly all other locations, the sign bears the word "Democrat", including the sign on his website "samhunt.net".

The first violative ad is on pg. 4 of the attached TCD newsletter, March 2016 edition.

The second violative ad is on pg. 7 of the attached TCD newsletter, July 2016 edition.

5) Failure to accurately report debt for an ad. (Violation of RCW 42.17A.240 (8))

RCW 42.17A.240 (8) requires that candidates report the following:

The name and address of any person and the amount owed for any debt, obligation, note, unpaid loan, or other liability in the amount of more than two hundred fifty dollars or in the amount of more than fifty dollars that has been outstanding for over thirty days;

Unfortunately, Hunt completely failed to report his obligation to pay the Thurston County Democrats for a March advertisement (valued at \$76.50) in their newspaper.

My understanding is that the Democrat newspaper is printed and distributed in Thurston by the 5th day of the month listed on the newsletter:

In this instance, it was likely distributed by 3/5/2016.

Calculating conservatively for printing and distribution time, Sam Hunt must have placed the ad at least 7 days prior to the paper going out, so the "debt" for this advertisement was likely incurred by 2/28/2016

This should have been reported as debt on the 4/9/2016 C4 covering the time period of 01/01/2016 to 03/31/16.

Unfortunately, it was not reported as an expenditure until Hunt submitted his 5/3/2016 C4 covering the time period of 4/1/2016 to 4/30/2016. This is a violation of RCW 42.17A.240 (8).

6) Failure to accurately file expenditure reports (C4) by deadline. (Violation of RCW 42.17A.235)

a) According to the PDC, the accurate report of expenditures (C4) for the time period of 10/18/2016 to 10/31/2016 was due on 11/1/2016.

Unfortunately, Hunt's campaign failed to file an accurate report containing all expenditures. Namely, Hunt's original C4 for this time period (Ref. # 100731713) failed to include a 10/24/2016 expenditure of \$360.00 to Isaac Wagnitz for "GOTV Consulting"

Hunt's campaign failed to file an accurate report until 11/22/2016, when they submitted an amended C4 that included this expenditure. This is well past the statutory deadline.

b) According to the PDC, the accurate report of expenditures (C4) for the time period of 07/12/2016 to 07/25/2016 was due on 07/26/2016.

Hunt's campaign filed an inaccurate C4 (Ref. # 100711308) on 7/26/2016, that failed to include a 7/15/2016 expenditure of \$3618.45 to Capitol City Press for "mailer postage".

Hunt's campaign failed to file an accurate report until 8/02/2016, well past the statutory deadline.

c) According to the PDC, the accurate report of expenditures (C4) for the time period of 6/01/2016 to 7/11/2016 was due on 7/12/2016.

Hunt's campaign filed an inaccurate C4 (Ref. #100707551) on 7/12/2016, that failed to accurately include the true amount of expenses made for \$50 or less. Unfortunately, the Hunt campaign initially listed \$41.08 instead of the true amount of \$56.67.

Hunt's campaign failed to file an accurate report until 7/26/2016, well past the statutory deadline.

d) According to the PDC, the accurate report of expenditures (C4) for the time period of 05/01/2016 to 05/31/2016 was due by 06/10/2016.

Hunt's campaign filed an inaccurate C4 (Ref. # 100698862) on 06/06/2016, that failed to include an expenditure during this time period for "Expenses of \$50 or less" worth \$43.72.

Hunt's campaign failed to file an accurate report until 7/26/2016, well past the statutory deadline.

7) Late Filing of F1 Personal Statement (Violation of RCW 42.17A.700(1))

Sam Hunt failed to submit an accurate F1 report to the PDC by 4/15/2016, as required by RCW 42.17A.700(1).

This report was not submitted until 4/20/2016, well past the statutory deadline. (See attached F1.)

I urge the PDC to do a complete investigation of Hunt's campaign and take appropriate action against him immediately for these serious violations. As the chair of the committee that originated many of the laws he violated, Hunt has absolutely no excuse for noncompliance.

Best regards,

Glen Morgan