

# File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Fri, 8 Dec at 8:48 PM) via Portal Meta

To Whom it May Concern --

It has come to my attention that Kelsey Hulse, her candidate committee, and her treasurer have habitually and willfully committed frequent and multiple violations of **RCW 42.17A**. Additionally, I have reason to believe that other violations of this chapter have occurred beyond what I have identified below.

## 1) Failure to file accurate, timely C3 and C4 reports. (Violation of RCW 42.17A.235)

State law requires that candidates and committees file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Hulse has repeatedly failed to do this.

Unfortunately, Kelsey Hulse has failed to report the in-kind contribution of \$100 per month for every month that Josie Olson and Blue Wave Political Partners have continued to provide her PDC compliance/ treasury services.

As evidence of the market value of this service, please see below:

<a href="#">Report</a>	BLUE WAVE POLITICAL PARTNERS LLC	5/5/2016	\$100.00	SEATTLE	WA
<a href="#">Report</a>	BLUE WAVE POLITICAL PARTNERS LLC	6/7/2016	\$100.00	SEATTLE	WA
<a href="#">Report</a>	BLUE WAVE POLITICAL PARTNERS LLC	7/1/2016	\$100.00	SEATTLE	WA
<a href="#">Report</a>	BLUE WAVE POLITICAL PARTNERS LLC	8/5/2016	\$100.00	SEATTLE	WA
<a href="#">Report</a>	BLUE WAVE POLITICAL PARTNERS LLC	9/6/2016	\$100.00	SEATTLE	WA
<a href="#">Report</a>	BLUE WAVE POLITICAL PARTNERS LLC	10/3/2016	\$100.00	SEATTLE	WA
<a href="#">Report</a>	BLUE WAVE POLITICAL PARTNERS LLC	11/2/2016	\$100.00	SEATTLE	WA
<a href="#">Report</a>	BLUE WAVE POLITICAL PARTNERS LLC	11/30/2016	\$100.00	SEATTLE	WA

Additionally, Hulse failed to report the unsuspended portion of the penalty + other costs (\$2405) of the settled AG lawsuit against her as debt, as required by state law. See link: [http://agportal-s3bucket.s3.amazonaws.com/uploadedfiles/Another/News/Press Releases/Stipulation-20170303-AgrdJdgmnt.pdf](http://agportal-s3bucket.s3.amazonaws.com/uploadedfiles/Another/News/Press%20Releases/Stipulation-20170303-AgrdJdgmnt.pdf)

Finally, there continues to be the issue of the continue debt that she owes to the vendor who provided video services to her campaign. At some point, the PDC must rule as to how long a candidate may carry debts such as these without them becoming illegal, over-limit contributions. It has already been a year and Hulse has not paid this debt back.

## 2) Failure to timely update C1-pc. (Violation of RCW 42.17A.205(4))

On information and belief, Hulse has failed to update her C1-pc to include the accurate name of her treasurer or other officers.

**3) State law requires that both the treasurer and the candidate must certify all contribution and expenditure reports as correct and accurate. RCW 42.17A.235 (7).**

On information and belief, Hulse has failed to personally certify these reports. Instead, Hulse's electronic signature is being auto-generated on these contribution and expenditure reports by her treasurer, in violation of state law. This practice must cease immediately.

**4) Illegal depositing of campaign funds into bank account by person other than the treasurer or deputy treasurer. (Violation of RCW 42.17A.220 (1))**

On information and belief, Hulse has allowed individuals other than her treasurer or deputy treasurer to deposit checks into her campaign bank account.

The PDC should investigate the possibility that Kelsey Hulse committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)**. If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan