

NATHAN T. ALEXANDER
Partner; Local Department Head Trial
(206) 903-8791
FAX (206) 260-4140
alexander.nathan@dorsey.com

November 22, 2024

VIA EMAIL & U.S. MAIL

Phil Stutzman, Compliance Officer
Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

RE: Response to PDC November 5, 2024 Letter (PDC Case Number 161712)

Dear Mr. Stutzman,

Lawrence Patrick Hughes (“Mr. Hughes”) has asked our firm to assist him in drafting his response to *Washingtonians for Ethical Government’s* October 29, 2024 Formal Complaint letter (the “Complaint Letter”) submitted to the Washington Public Disclosure Commission (“PDC”) about him. We appreciate the opportunity to address this misunderstanding.

Throughout their life together, Mr. Hughes and Mary Ellen Hughes (“Mrs. Hughes”) consistently gave to a variety of charitable causes, including to political candidates and causes, and they frequently supported the same candidates/causes. After Mrs. Hughes’ passing last October, Mr. Hughes continued his philanthropic efforts and political giving. He has never sought to circumvent regulations or rules concerning political contributions. The allegations raised in the Complaint Letter point to nothing more than an unfortunate misunderstanding on the part of Mr. Hughes, which he has addressed to prevent any future mistakes.

According to our best understanding of the situation, after speaking with Mr. Hughes and his family assistant, Chris Hendley, the misunderstanding boils down to this: Mr. Hughes asked Ms. Hendley to send out his usual checks for campaign contributions. Mr. and Mrs. Hughes had joined their finances during their marriage and issued checks bearing both of their names. Mr. and Mrs. Hughes’ usual practice was to donate their legal maximum together on one check. Though written in one amount on one check, the total was split in half and treated as their separate contributions consistent with their individual legal contribution limits. Unfortunately, due to Mrs. Hughes’ recent passing, many of Mr. Hughes’ unused checks still bore Mrs. Hughes’ name together with his own. When Chris sent out Mr. Hughes’ “usual” donations, she sent out checks for \$4,800—as she had previously done back when Mrs. Hughes was still with us. These once-usual checks, unbeknownst to Mr. Hughes and Ms. Hendley, accidentally took Mr. Hughes’ contributions above the appropriate level this year.

In a similar vein, Mr. Hughes issued a single \$100,000 check to Let’s Go Washington on July 25, but because of Mr. Hughes’ joint donation history with Mrs. Hughes—and because Mr. Hughes’ checkbook still bore her name—Let’s Go Washington appears to have erroneously recorded that single \$100,000 donation from Mr. Hughes as two \$50,000 donations, one from Mr. Hughes and one from Mrs. Hughes.

November 22, 2024
Page 2

Mr. Hughes has been a frequent campaign donor for more than thirty years, and after all this time, this is the first time he has ever been accused of making contributions over legal limits or of concealing a contribution's source. He had no intention to circumvent campaign-finance law.¹ Any overpayment was an honest mistake stemming from a simple misunderstanding between Mr. Hughes and his assistant during a time when Mr. Hughes has been adjusting to his newfound life as a widower after 65 years of marriage. Everyone involved is confident that this first-time offense will be an only-time offense.

Thank you for reaching out and giving us an opportunity to address the Complaint Letter. We are happy to answer questions you may have concerning this isolated incident but trust this letter will conclude the matter.

Best Regards,

DORSEY & WHITNEY LLP

Nathan T. Alexander

Nathan T. Alexander
Partner; Local Trial Department Head
Counsel for Lawrence Patrick Hughes

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¹ This unfortunate error has already been partially corrected: Mr. Hughes received a \$2,400 refund from the Jaime for Lands campaign on October 30—almost a week before he received PDC's letter with the Complaint Letter.