

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported (Thu, 28 Sep at 2:55 PM) via Portal [Meta](#)
To Whom it May Concern --

It has come to my attention that Kelsey Hulse -- a failed 2016 candidate for Thurston County Commissioner -- has committed further violations of **RCW 42.17A**.

1) State law requires that campaigns accurately identify the name of a contributor, and prohibits the concealment of the identity of a contributor. RCW 42.17A.435. WAC 390-16-308 (3). State law further requires that accurate reports of contributions be submitted in a timely manner. RCW 42.17A.235. State law also requires that the address of contributors be accurately reported. RCW 42.17A.240. State law also establishes that candidates must return contributions that exceed the contribution limits contained in RCW 42.17A.405 within 10 days of receipt. RCW 42.17A.405, RCW 42.17A.110, WAC 390-16-312.

WAC 390-16-308 (3) establishes that contributions received from a sole proprietor or drawn upon the account of a business which is a sole proprietorship is attributable to the owner of the business entity and reported as such to the PDC.

JZK Inc. is a sole proprietorship owned wholly by JZ Knight (see attached), and as such, this contribution must have been attributed to JZ Knight.

During the 2016 cycle, JZ Knight made 4 \$1000 contributions - two attributed to the general and two attributed to the primary - to Kelsey Hulse's campaign. Two of these contributions were properly attributed to JZ Knight, the other two was illegally attributed to JZK Inc.

As such, JZ Knight contributed \$2000 to Hulse for the primary and \$2000 for the general, while the limit for a contribution from an individual for each election was only \$1000. This is a violation of state law.

JZK Inc. is a sole proprietorship owned wholly by JZ Knight (see attached), and as such, this contribution must have been attributed to JZ Knight. JZ Knight is a cult leader who lives in her walled compound in Yelm, WA and

claims to channel a 35,000 year old homicidal Lemurian warrior spirit named "Ramtha." Apparently, "Ramtha" has travelled 35,000 years through space and time to help JZ Knight contribute to Jim Cooper among other political candidates. "Ramtha" also endorsed Donald Trump for President, but JZ Knight claims she only supports Democrats. The State Democratic Party divested itself of JZ Knight funds in 2012 after videos exposing her racist rants against Mexicans, Jews, Catholics and others went public. Some local Thurston County candidates and committees last year were less concerned about the racism than they were about collecting cult cash.

Hulse must immediately refund these over-limit contribution. She is well past the 10 day requirement for doing so.

2) State law requires that candidates file regular, accurate, timely C3 and C4 reports. RCW 42.17A.235.

a) Hulse's C4 for the month of July 2017 was due on 8/10/2017. Unfortunately, Hulse has not still submitted this report. **This report is significantly late and must be submitted immediately.**

b) On 3/2/2017, Hulse (through her counsel) signed a stipulation and agreed judgement obligating her to pay a \$1030.00 principal judgement (\$515 suspended) and \$1890.00 in attorney fees, costs of investigation and trial. *See attachment.*

She was obligated to repay this money within one year. According to her C4 reports, she has not yet paid this sum. As such, she must report it as debt until it is paid. Unfortunately, she failed to do so. **This is a violation of state law.**

c) Hulse failed to file a significant amount of reports before the deadlines specified under state law. See below:

Report #	Type	Amended	Deposit Date	Due Date (2016)	Date Submitted	Days Late (2016)

100733558	C4	Y		5/11/2016	11/3/2016	176
100733559	C4	Y		6/10/2016	11/3/2016	146
100733556	C3	Y	8/19/2016	8/22/2016	11/3/2016	73
100699563	C3	Y	4/25/2016	5/10/2016	6/7/2016	28
100699565	C3	Y	4/29/2016	5/10/2016	6/7/2016	28
100720174	C3	N	8/22/2016	8/29/2016	9/12/2016	14
100738918	C4	Y		12/12/2016	12/21/2016	9
100737874	C3	N	11/8/2016	12/10/2016	12/12/2016	2
100786772	C4	N		9/10/2017	9/11/2017	1
100711419	C3	N	7/19/2016	7/25/2016	7/26/2016	1
100718695	C3	N	9/1/2016	9/5/2016	9/6/2016	1
100718696	C3	N	8/29/2016	9/5/2016	9/6/2016	1
100718699	C3	N	9/1/2016	9/5/2016	9/6/2016	1

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. It is particularly concerning that these violations would be continuing to occur despite the Attorney General's previous enforcement of campaign violations for this candidate.

Best Regards,

Glen Morgan

EX PARTE

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

KELSEY HULSE, individually, and
FRIENDS OF KELSEY HULSE, a
candidate authorized political
committee,

Defendants.

NO. 17-2-00848-34

STIPULATION AND AGREED
JUDGMENT

JUDGMENT SUMMARY (RCW 4.64.030)

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: KELSEY HULSE, individually, and FRIENDS OF
KELSEY HULSE, a candidate authorized political
committee
- C. PRINCIPAL JUDGMENT: \$1,030.00 with \$515.00 suspended for a period of 4
years contingent on no findings of violations of the law
committed during the period of suspension
- D. INTEREST: No prejudgment interest is owed. Principal judgment
amount(s) due and owing shall not bear interest unless
the principal judgment is unpaid by the due date specified
herein
- E. COSTS AND FEES: \$1,890.00 as attorney fees, costs of investigation and
trial
- F. ATTORNEYS FOR JUDGMENT CREDITOR Office of the Attorney General
LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General

 COPY

WALTER M. SMITH, WSBA No. 46695
Assistant Attorney General

G. ATTORNEY FOR TAKI FLEVARIS, WSBA No. 42555
JUDGMENT DEBTOR Pacifica Law Group LLP

STIPULATION

The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE) and Defendants, KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee, desiring to resolve all claims arising out of the State's complaint, hereby enter into the following stipulation:

1. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee, agree to pay an assessed civil penalty in the amount of \$1,030.00 for their violations of RCW 42.17A for failing to timely disclose debts incurred for campaign videos.
2. The parties agree that \$515.00 of the assessed civil penalty will be suspended based on the following terms and conditions:
 - a. The suspension will be in effect for four years from the date of execution of the Judgment. During the period of suspension, Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee, agree that they will not violate any provision of RCW 42.17A.
 - b. In the event Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee, are found by the Public Disclosure Commission or a court to have committed a violation of RCW 42.17A during the suspension period, the suspended penalty of \$515.00 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

1 c. If Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY
2 HULSE, a candidate authorized political committee, are not found to have
3 committed violations of RCW 42.17A by the Public Disclosure Commission or a
4 court for conduct during the suspension period, then the suspended portion of the
5 penalty will be set aside.

6 3. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a
7 candidate authorized political committee, agree to pay the State the total amount of
8 \$1,890.00 as attorney fees, court costs, and costs of investigation in this action.

9 4. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a
10 candidate authorized political committee, agree to pay the State the unsuspended portion of
11 the civil penalty (\$515.00) and fees and costs (\$1,890.00) within 12 months from the date
12 of the entry of the Judgment.

13 DATED this 2nd day of March, 2017.

14 ROBERT W. FERGUSON
15 Attorney General

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17 LINDA A. DALTON, WSBA No. 15467
18 Senior Assistant Attorney General
19 WALTER M. SMITH, WSBA No. 46695
Assistant Attorney General
Attorneys for Plaintiff

20 PACIFICA LAW GROUP LLP

21 

22 TAKI FLEVARIS, WSBA No. 42555
23 Attorneys for Defendant

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JUDGMENT

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. Plaintiff, STATE OF WASHINGTON, appearing through its attorneys of record, ROBERT W. FERGUSON, Attorney General, LINDA A. DALTON, Senior Assistant Attorney General, and WALTER M. SMITH, Assistant Attorney General, and Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee, appearing through their attorney, TAKI FLEVARIS, PACIFICA LAW GROUP LLP, apprised the Court of their agreement to the entry of this judgment for the purpose of settling and compromising this action brought under RCW 42.17A. The Court, having reviewed the records and files herein, and having found the settlement to be a just and proper resolution of this matter, and being otherwise fully advised in the premises, hereby ORDERS as follows:

1. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee, are hereby assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$1,030.00 payable to the State of Washington.
2. The amount of \$515.00 of the assessed penalty is hereby suspended upon Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE's, a candidate authorized political committee, compliance with the following court-ordered conditions:
 - a. The suspension will be in effect for four years from the date of execution of the Judgment. During the period of suspension, Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee agree that they will not violate any provision of RCW 42.17A.
 - b. In the event Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee are found by the Public Disclosure

Commission or a court to have committed a violation of RCW 42.17A during the suspension period, the suspended penalty of \$515.00 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

c. If Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee are not found to have committed violations of RCW 42.17A by the Public Disclosure Commission or a court for conduct during the suspension period, then the suspended portion of the penalty will be set aside.

3. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee, shall pay the State the total amount of \$1,890.00 as attorney fees, court costs, and costs of investigation in this action.

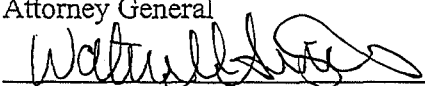
4. Defendants KELSEY HULSE, individually, and FRIENDS OF KELSEY HULSE, a candidate authorized political committee, shall pay the State the unsuspended portion of the civil penalty (\$515.00) and fees and costs (\$1,890.00) within 12 months from the date of the entry of the Judgment.

DONE IN OPEN COURT this 3rd day of March, 2017.

REBEKAH ZINN

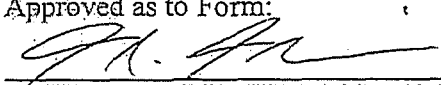
Judge COURT COMMISSIONER

Presented by:
ROBERT W. FERGUSON
Attorney General



LINDA A. DALTON, WSBA No. 15467
Senior Assistant Attorney General
WALTER M. SMITH, WSBA No. 46695
Assistant Attorney General
Attorneys for Plaintiff State of Washington

Approved as to Form:



TAKI FLEVARIS, WSBA No. 42555
PACIFICA LAW GROUP LLP
Attorneys for Defendant

JZK, INC.

UBI Number	601524947
Category	REG
Profit/Nonprofit	Profit
Active/Inactive	Active
State Of Incorporation	WA
WA Filing Date	03/14/1994
Expiration Date	03/31/2018
Duration	Perpetual
Registered Agent Information	
Agent Name	GTH CORPORATE SERVICES, LLC
Address	1201 PACIFIC AVE STE 2100
City	TACOMA
State	WA
ZIP	984020000
Special Address Information	
Address	PO BOX 1157
City	TACOMA
State	WA
Zip	984010000

Governing Persons (as defined in RCW 23.95.105(12) (<http://app.leg.wa.gov/RCW/supdefault.aspx?cite=23.95.105>))

Title	Name
Governor	KNIGHT , JUDITH