

**KENTUCKY REGISTRY OF ELECTION FINANCE
CASE NO. 2015-114**

**In re: Campaign Fund of Charles Lovett for Kentucky Secretary of State,
Charles Lovett, Candidate/Treasurer**

**SUPPLEMENTAL STAFF REPORT,
RECOMMENDATIONS AND ORDER**

This case came before the Kentucky Registry of Election Finance (Registry) at its September 24, 2015 regular meeting, pursuant to Notice and Staff Report (Staff Report) dated August 12, 2015. Charles Lovett (Respondent or Lovett), Candidate for Kentucky Secretary of State, and Treasurer of the Campaign Fund of Charles Lovett for Kentucky Secretary of State (Lovett Campaign Fund) responded to the Staff Report, by letter received by the Registry on September 22, 2015. At the Registry's September 24, 2015 meeting, the Registry was presented the Supplemental Staff Report and Recommendations as set forth herein. The Registry did not request any Respondent to appear at its meeting to present additional information relative to the case, and Lovett did not appear at the meeting. The proceeding was transcribed and is authorized by KRS 121.120, KRS 121.140, and 32 KAR 2:040.

SUPPLEMENTAL STAFF REPORT

Introduction

Charles Lovett (Lovett) was a candidate for the office of Kentucky Secretary of State during the 2015 Democratic primary. Lovett notified the Registry of his candidacy on January 26, 2015, naming himself as Treasurer of the Campaign Fund of Charles Lovett for Kentucky Secretary of State (Lovett Campaign Fund). The campaign's sole Election Finance Statement, received by the Registry on June 25, 2015, reflects that the Lovett Campaign Fund terminated its primary election campaign activities on June 22, 2015, after spending \$389.99 in the primary election reporting period.

Pursuant to KRS 121.120(4)(k), Registry Auditor David Simpson audited the Lovett Campaign Fund's 2015 primary election account. The audit revealed that the Lovett Campaign Fund may have violated KRS 121.120(6)(h), by failing to electronically file election finance statements required to be submitted to the Registry. The audit also noted that Lovett failed to designate a campaign account for receipt of all contributions and disbursement of campaign expenditures, in apparent violation of KRS 121.220(1) and (2).¹ The audit report formed the basis of the General Counsel's reason to believe findings in the Staff Report dated August 12, 2015. However, Staff Report was returned "unclaimed" to the Registry on September 8, 2015. Lovett was re-notified by telephone call and Staff Report mailed first class on September 14, 2015.²

The Registry received Lovett's response on September 22, 2015. In response to the Staff Report, Lovett stated he did not recall having received the February 2, 2015 letter from the Registry Auditor, which included information to assist in compliance with Kentucky's campaign finance laws and regulations. Lovett also stated that he was scheduled for candidate training on at least three (3) separate occasions; however, the training was postponed due to conflicts with his work schedule and a snow storm. Lovett claimed that, because the information was not effectively delivered to him, he should not be held liable for the violations.³

A review of the Registry's record confirmed Lovett's response. The original February 2, 2015 letter was located by Registry staff on September 22, 2015 in an envelope addressed to Lovett together with informational materials that the Registry's auditor intended to hand-deliver to Lovett at a meeting initially scheduled on Thursday, February 5, 2015, which never occurred.

¹ See attached Exhibit A: July 24, 2015 Audit Report and supporting documentation regarding the Lovett Campaign Fund, 2011 primary election.

² See attached Exhibit B: Copy of envelope returned UNCLAIMED to Registry and September 14, 2015 letter to Lovett.

³ See Exhibit C: Lovett letter in response, dated September 17, 2015, received by the Registry on September 22, 2015.

The February 5, 2015 meeting was rescheduled for February 9, 2015, which was also cancelled and rescheduled for an undetermined date, which apparently also never occurred due to weather concerns.

ANALYSIS

I. Alleged failure to Electronically Report Campaign Finances

The audit report notes that the Lovett Campaign Fund failed to electronically report its campaign finances despite notification of the requirement by the Registry's auditors. KRS 121.120(6)(h) requires "candidates . . . for statewide office, beginning with elections scheduled in 2015, to electronically report all election finance reports that must be submitted to the registry under this chapter." See KRS 121.120(6)(h). The audit report states that the Lovett Campaign Fund was notified of the electronic filing requirement by letter from the Registry's auditor dated February 2, 2015, and by courtesy call prior to the due date for filing the 30 Day Post Election Finance Statement.⁴

While the record establishes that Lovett did not receive the letter from the Registry dated February 2, 2015, this does not excuse him from complying with all campaign finance requirements. As the Lovett Campaign Fund failed to electronically file election finance statements required to be submitted to the Registry pursuant to KRS 121.120(6)(h), Lovett should be held responsible for his campaign's failure to electronically report its campaign finances during the 2015 primary.

II. Alleged failure to designate primary campaign depository

Kentucky law requires a candidate to designate one (1) primary campaign depository to deposit all contributions and disburse all expenditures made in connection with the candidate's campaign. See KRS 121.220(1) and (2). The audit states that Lovett apparently used personal

⁴ See attached Exhibit A, Summary of Results, Item 1.

funds only in connection with the campaign and provided the Registry's auditor with no evidence of a separate campaign fund.⁵ Lovett states in his response that he did not open a campaign account because he was using personal funds only and did not seek contributions for his campaign. He also claims that he was not aware of this requirement, as he was unable to attend the candidate training session.⁶

The requirement to designate a primary campaign depository applies to all Kentucky candidates. Despite the Registry's failure to deliver a statewide candidate welcome packet to Lovett, the requirement to designate a primary campaign depository is easily ascertained on review of the Registry's website (<https://kref.ky.gov>) relating to candidates. As a candidate for statewide office, Lovett should at a minimum have reviewed the website to ascertain the obligation to open a campaign account separate and apart from his personal account in the event someone wanted to make a contribution to his campaign.

RECOMMENDATIONS

For reasons outlined above, the General Counsel recommends that the Registry find probable cause to believe that the Lovett Campaign Fund, by and through its Candidate/Treasurer, Charles Lovett, violated KRS 121.120(6)(h), by failing to electronically report campaign finances during the 2015 primary; and KRS 121.220(1) and (2) by failing to designate a primary campaign depository in connection with his campaign for Kentucky Secretary of State.

Therefore, it is further recommended, pursuant to 32 KAR 2:050, that the Registry refer the violations of KRS 121.120(6)(h), and KRS 121.220(1) and (2) to the Executive Director and General Counsel for conciliation.

⁵ See attached Exhibit A, Summary of Results, Item 2.

⁶ See attached Exhibit C: Lovett response letter.

ORDER

Having considered the above Supplemental Staff Report, Respondent having received notice, and being otherwise duly advised, **IT IS HEREBY ORDERED** that the facts, legal analysis, and recommendations of the General Counsel as set forth herein are approved and adopted as part of this Order, consistent with the Registry's action at its September 24, 2015 regular meeting.

Based on the record of the case, the Registry **FINDS PROBABLE CAUSE** to believe that Lovett, as Candidate and Treasurer of the Lovett Campaign Fund, violated KRS 121.160(6)(h) by failing to electronically report the campaign's finances with the Registry in the 2015 primary election campaign; and KRS 121.220(1) and (2) by failing to designate a primary campaign depository in connection with his campaign for Kentucky Secretary of State.

THE REGISTRY, THEREFORE, ORDERS and hereby REFERS the above-referenced violations by Lovett to the Executive Director and General Counsel to begin conciliation proceedings.

This 7th day of October, 2015.

KENTUCKY REGISTRY OF ELECTION FINANCE
140 Walnut Street
Frankfort, Kentucky 40601
(502) 573-2226




CRAIG C. DILGER, CHAIRMAN

CERTIFICATE OF SERVICE

This is to certify that an accurate copy of the foregoing Supplemental Staff Report, Recommendations and Order was served by U.S. Mail, first class, postage prepaid, upon Respondent at the following address, this 13th day of October, 2015:

Charles Lovett
Post Office Box 11073
Louisville, Kentucky 40251



Emily Dennis
General Counsel

INDEX OF EXHIBITS

- Exhibit A:** July 24, 2015 Audit Report and supporting documentation regarding Lovett Campaign Fund
- Exhibit B:** Copy of envelope returned UNCLAIMED to Registry and September 14, 2015 letter to Lovett
- Exhibit C** Lovett response letter

EXHIBIT A



KENTUCKY REGISTRY OF ELECTION FINANCE

Steven L. Beshear
Governor

140 Walnut Street
Frankfort, Kentucky 40601-3240
Phone: (502) 573-2226
Fax: (502) 573-5622
www.kref.ky.gov

Craig C. Dilger
Chairman
John R. Steffen
Executive Director
Emily Dennis
General Counsel

July 24, 2015

To the People of the Commonwealth of Kentucky
Chairman and Members of the Registry of Election Finance

As Auditor for the Registry of Election Finance, I am pleased to transmit the report of our audit of the 2015 primary election campaign of Charles Lovett for the office of Secretary of State for the period January 26, 2015 (Inception) through June 22, 2015 (Termination). This report contains our findings as related to the Campaign's compliance with the provisions of Chapter 121 of the Kentucky Revised Statutes governing campaign finances.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "David C. Simpson".

David C. Simpson - CFE
Auditor

Enclosures

cc: Charles Lovett, Candidate for Secretary of State

**CAMPAIGN FUND OF CHARLES LOVETT FOR SECRETARY OF STATE
2015 PRIMARY ELECTION
AUDIT REPORT
FOR THE PERIOD JANUARY 26, 2015 (INCEPTION)
THROUGH JUNE 22, 2015 (TERMINATION)**

INTRODUCTION

Pursuant to the provisions of the Campaign Finance Regulation, Kentucky Revised Statutes, Chapter 121, Charles Lovett notified the Kentucky Registry of Election Finance of his intent to seek nomination as a candidate for the office of Secretary of State.

The Appointment of Campaign Treasurer form designates Charles Lovett as his own treasurer.

SCOPE

The examination of the campaign's records was conducted to ascertain compliance with the Campaign Finance Regulation, Kentucky Revised Statutes, Chapter 121. We have included such comments and recommendations regarding internal control over financial transactions as we deemed necessary.

Our tests included but were not limited to the following:

- Reconciliation of the campaign's bank account.
- Review of receipts and disbursements documentation.
- Review of in-kind contributions and fund raising activities.
- Comparison of the campaign's records to the campaign's reports, as filed.

SUMMARY OF RESULTS

CRITERIA

1. CRITERIA: KRS 121.120(6)(h):

Require candidates and slates of candidates running for statewide office, and campaign committees of candidates and slates of candidates registered to run for statewide office, beginning with elections scheduled in 2015, to electronically report all election finance reports that must be submitted to the registry under this chapter.

FINDINGS

The campaign was notified of the electronic filing requirement by auditor letter dated February 2, 2015 (Exhibit 1). The candidate was scheduled several times for a candidate training session, during which this requirement would have been discussed, but due to various reasons, the candidate was unable to attend and cancelled. The candidate selected the \$3000 or less reporting option. Auditor Greg Cordier made a courtesy call to the candidate before the due date of the 30 day post primary report to discuss the electronic reporting requirement, however, the candidate failed to electronically file the 30 day post election finance statement terminating the campaign (Exhibit 2).

CRITERIA

2. CRITERIA: KRS 121.220(1) and (2):

(1) Each candidate, slate of candidates, and each committee shall, before receiving any contributions or expending any money, designate one (1) primary campaign depository for the purpose of depositing all contributions received and disbursing all expenditures made by the candidate, slate of candidates, or committee.

and

(2) All funds received by the campaign treasurer or any deputy campaign treasurer of any candidate, slate of candidates, or committee shall be deposited in a campaign depository in an account designated "Campaign Fund of (name of candidate or committee)."

FINDINGS

The requirement to maintain a primary campaign depository designated "Campaign Fund of" is outlined in the material accompanying the audit letter sent to the candidate dated February 2, 2015 (See Exhibit 1). This requirement also would have been discussed with the candidate had an initial auditor meeting been scheduled. Upon review of the filed Election Finance Statement and submitted invoices, the candidate apparently used his own personal funds for website design/fees and photography (Exhibit 2). No evidence of a separate "campaign fund" was provided by the candidate.

**CAMPAIGN OF CHARLES LOVETT FOR SECRETARY OF STATE
2015 PRIMARY ELECTION
STATEMENT OF RECEIPTS AND DISBURSEMENTS
FOR THE PERIOD JANUARY 26, 2015 THROUGH JUNE 22, 2015**

<u>BEGINNING BALANCE</u>		\$	0.00
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CONTRIBUTIONS

Candidate	\$ 389.99		
-----------	-----------	--	--

TOTAL CONTRIBUTIONS		\$	389.99
---------------------	--	----	--------

DISBURSEMENTS

Campaign Expenditures	\$ 389.99		
-----------------------	-----------	--	--

TOTAL DISBURSEMENTS		\$	389.99
---------------------	--	----	--------

<u>ENDING BALANCE</u>		\$	0.00
-----------------------	--	----	------

Exhibit 1
1082



KENTUCKY REGISTRY OF ELECTION FINANCE

Steven L. Beshear
Governor

140 Walnut Street
Frankfort, Kentucky 40601-3240
Phone: (502) 573-2226
Fax: (502) 573-5622
www.kref.ky.gov

Craig C. Dilger
Chairman

Rebecca Feland
Interim Executive Director

Emily Dennis
General Counsel

February 2, 2015

Charles Lovett
Candidate for Secretary of State
PO Box 11073
Louisville, KY 40251

Filer #292439

Dear Candidate Lovett:

Pursuant to KRS 121.120(4)(k), the Registry is required to conduct an audit of the receipts and expenditures of all statewide candidates. I am the auditor currently assigned to your campaign and will be your contact person at the Registry. All enclosures referenced in this correspondence are provided to both the candidate and the treasurer.

The information in this packet was prepared by the Registry of Election Finance to assist candidates, slates of candidates, and their treasurers in complying with Kentucky campaign finance laws and regulations. It is intended as a guide only, and in no way supersedes statutory provisions, administrative regulations or case law. We are enclosing the following materials to assist in your campaign finance endeavors:

- **CANDIDATE GUIDE TO CAMPAIGN FINANCE (REVISED 08/2011)**
- **TEN IMPORTANT CAMPAIGN FINANCE QUESTIONS**
- **KREF ONLINE INFORMATION**
- **CONTRIBUTION LIMITS CHART**
- **RECORDKEEPING SUGGESTIONS**
- **SAMPLE CAMPAIGN CONTRIBUTION CARD**
- **REPORTING DATES FOR CANDIDATES**
- **LATE FILING FINES & PROCEDURES**
- **ELECTION FINANCE STATEMENT FORM (KREF 006) – REQUIRED TO BE FILED ELECTRONICALLY, USING APPROVED SOFTWARE PER KRS121.120(6)(h)**
- **FUNDRAISER REGISTRATION FORM (KREF 019)**
- **REGISTERED FUNDRAISER STATEMENT FORM (KREF 006/F)**
- **E-MAIL REMINDER PROJECT NOTICE**

Charles Lovett Candidate for Kentucky State Treasurer
February 2, 2015
Page 2 of 2

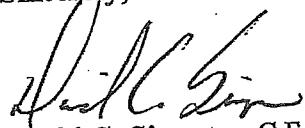
Electronic versions of these enclosures, along with all Registry publications and many other useful resources, are available on the Registry's website at www.kref.ky.gov. Among the useful resources on the website are links to approved electronic filing software vendors. These approved vendors sell software which is tailored to assist statewide candidates in complying with the Registry's reporting provisions and meets the Registry's software and data format requirements. Use of electronic filing software is required for all statewide candidates per KRS 121-120(6)(h).

Your first Election Finance Statement is due **June 18, 2015** and must be received by the Registry or postmarked by **June 23, 2015** in order to be considered timely filed. KRS 121.180(8) requires a copy of each Election Finance Statement to be filed with the county clerk of the candidate's residence.

Please contact me at your earliest convenience to schedule a meeting in our Frankfort office to discuss campaign finance recordkeeping and reporting requirements. Should you have additional questions prior to our meeting, you may contact me at (502) 573-2226.

I look forward to working with you and others associated with your campaign.

Sincerely,



David C. Simpson, C.F.E.
Auditor

Enclosures

cc: Rebecca Feland, KREF Interim Executive Director

Exhibit 2
1054

ELECTION FINANCE STATEMENT - COVER PAGE

(Please type or print)

1. Candidate/Slate of Candidates: CHARLES LOVETT
Committee Name: _____
Date of Birth: 04/24/1985 KREF Filer # 292439
Office Sought: Secretary of State
District/Division Number: _____
County of Residence: Jefferson
Political Party: Democrat

2. Candidate/Slate of Candidates/Committee Mailing Address:

PO Box 11043
Louisville, KY 40251

Daytime Phone Number: (502) 314 - 1268

3. Treasurer's Name and Mailing Address:

CHARLES LOVETT
PO Box 11043

Louisville, KY 40251

Daytime Phone Number: (502) 314 - 1268

RECEIVED
This Space for Registry Use Only
2015 JUN 25 A 9:58
KY REGISTRY OF
ELECTION FINANCE
T
Logged ALS Keyed ALS
Election Status: W L
Candidate Status: INELG
WD
DD
T
Reporting Status: S Only
Debt Only
S/D
Continue to G
TFC

4. This Statement Covers:

From: January 2015 1/26/15
Month - Day - Year

To: June 2015 6/22/15
Month - Day - Year

INCLUDE INFORMATION FOR THIS ELECTION ONLY

5. Date of Election: 05/19/2015
Month-Day-Year

This Statement relates to: ☒ Primary ☐ General ☐ Special
☐ Run-off Primary

6. Type of Statement

- a. ☐ Quarterly
b. ☐ 32-day Pre-Election
c. ☐ 15-day Pre-Election
d. ☐ 30-day Post-Election
e. ☐ 60-day Post-Election Supplemental

f. ☐ Annual Supplemental

g. ☒ Termination June 2015
Month-Day-Year

h. ☐ AMENDMENT - Check one of the items above
to indicate which statement is being amended.

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this statement to the penalties of KRS 121.990.

7. Verification: I certify that I have examined this Election Finance Statement and to the best of my knowledge and belief it is true, correct, and complete.

Candidate or
Treasurer: Charles Lovett
Type or Print Name

Charles Lovett
Authorized Signature

Date: 6/22/2015
Month-Day-Year

SUMMARY PAGE

Page 2 of 12

Candidate/Slate of Candidates/Committee: CHARLES LOVETT

KREF Filer #: _____ Period From: 11/1/2015 To: 6/1/2015

RECEIPTS		COLUMN 1	COLUMN 2
		(This Period)	(Cumulative This Election)
1.	CONTRIBUTIONS: (including all receipts from Fundraisers)		
a.	Itemized by check or written instrument (Schedule 1A, Item 4a)	\$ <u>389.99</u>	\$ <u>389.99</u>
b.	Other receipts (Schedule 1A, Item 4c)	+\$ _____	\$ _____
c.	Receipts in currency (Number of people _____) (Individual cash contribution limit is \$50)	+\$ _____	\$ _____
d.	Anonymous (Number of people _____) (Maximum \$50 per contribution)	+\$ _____	\$ _____ (\$1,000 Maximum Per Election)
e.	Unitemized contributions (Number of people _____) (Contributions by check of \$100 or less)	+\$ _____	\$ _____
f.	Political Action Committee (PAC) contributions (Schedule 1B, Item 4a)	+\$ _____	\$ _____
g.	Executive Committee contributions (Schedule 1C, Item 3a)	+\$ _____	\$ _____
h.	Caucus Campaign Committee contributions (Schedule 1D, Item 3a)	+\$ _____	\$ _____
2.	TOTAL RECEIPTS	= \$ <u>389.99</u>	\$ <u>389.99</u>
DISBURSEMENTS			
3.	TOTAL DISBURSEMENTS (Schedule 2, Item 4)	\$ <u>389.99</u>	
IN-KIND CONTRIBUTIONS			
4.	a. In-kind Contributions Received (Schedule 1A, Item 4b)	\$ _____	\$ _____
	b. In-kind Contributions Received (PAC) (Schedule 1B, Item 4b)	\$ _____	\$ _____
	c. In-kind Contributions Received (Executive Com.) (Schedule 1C, Item 3b)	\$ _____	\$ _____
	d. In-kind Contributions Received (Caucus Campaign Com.) (Schedule 1D, Item 3b)	\$ _____	\$ _____
DEBTS AND OBLIGATIONS			
5.	TOTAL DEBTS AND OBLIGATIONS (Schedule 4, Item 7)	\$ _____	
BALANCE STATEMENT			
6.	Ending balance of previous report (Enter -0- if no previous report)	\$ <u>0</u>	No change since last report <input type="checkbox"/> (check if applicable) If nothing of value has been received and no expenditures have been made since the last report, list the Ending Balance line 10 amount from the last report as the Ending Balance line 10 amount on this report.
7.	Add total receipts during reporting period (Line 2, Column 1)	+\$ <u>389.99</u>	
8.	Sub-Total (Add lines 6 and 7)	= \$ <u>389.99</u>	
9.	Subtract total disbursements during reporting period (Line 3, Column 1)	- \$ <u>389.99</u>	
10.	ENDING BALANCE (Subtract Line 9 from Line 8)	= \$ <u>0</u>	

RECEIPTS SCHEDULE 1A

Page 3 of 12

Receipts in Excess of \$100 Must be Itemized

Candidate/Slate of Candidates/Committee: Charles Leach

KREF Filer #: _____

Period From: 1/1/2015 To: 6/1/2015

1. Contributor Name and Address Contributor Occupation and Employer Spouse's Name, Occupation and Employer	1b. Marital Status	2. Date of Receipt ____/____/____ 3. Type of Contribution	4a. Contribution by Check or Written Instrument	4b. Description and Value of In-Kind	4c. Other Receipts	5. Cumulative for Election (per Contributor)
Charles Leach Candidate PO Box 11043 Owensville, KY 40251	Single	____/____/____ <input checked="" type="checkbox"/> Direct from Candidate <input type="checkbox"/> Loan from Candidate <input type="checkbox"/> Direct from a person or authorized entity <input type="checkbox"/> Fundraising Event <input type="checkbox"/> Fundraiser (person) <input type="checkbox"/> In-kind <input type="checkbox"/> Other: _____	\$389.99			\$389.99
		____/____/____ <input type="checkbox"/> Direct from Candidate <input type="checkbox"/> Loan from Candidate <input type="checkbox"/> Direct from a person or authorized entity <input type="checkbox"/> Fundraising Event <input type="checkbox"/> Fundraiser (person) <input type="checkbox"/> In-kind <input type="checkbox"/> Other: _____				
		____/____/____ <input type="checkbox"/> Direct from Candidate <input type="checkbox"/> Loan from Candidate <input type="checkbox"/> Direct from a person or authorized entity <input type="checkbox"/> Fundraising Event <input type="checkbox"/> Fundraiser (person) <input type="checkbox"/> In-kind <input type="checkbox"/> Other: _____				
		____/____/____ <input type="checkbox"/> Direct from Candidate <input type="checkbox"/> Loan from Candidate <input type="checkbox"/> Direct from a person or authorized entity <input type="checkbox"/> Fundraising Event <input type="checkbox"/> Fundraiser (person) <input type="checkbox"/> In-kind <input type="checkbox"/> Other: _____				
SUBTOTAL THIS PAGE			389.99			
TOTAL THIS PERIOD (Only on last page of Schedule)			389.99			
Enter this total on Col. 1, line 1a of Summary Page			Enter this total on Col. 1, line 4a of Summary Page	Enter this total on Col. 1, line 1b of Summary Page		

Exhibit 2
4-84

ITEMIZED DISBURSEMENTS SCHEDULE 2

Page 4 of 12

Candidate/Slate of Candidates/Committee: Charles Lovett

KREF Filer #: _____ Period From: 1/1/2015 To: 6/1/2015

1. Name and Address of Person or Business Paid List Occupation if Paid to a Person	2. Purpose of Disbursement (Be specific)	3. Date of Disbursement	4. Amount Disbursed
One Touch Media Jerrisa Lindsey onetouchmedia@gmail.com (502) 794-7610	Campaign Website Design	2/15/2015	\$250.00
Groupen	Campaign Headshots (30 Penny)	5/11/2015	\$19.99
Squarespace, Inc 459 Broadway, 5th Floor New York, NY 10013	Campaign Website Fee	1/26/2015 2/26/2015 3/26/2015 4/26/2015 5/26/2015	\$120.00 (\$20/monthly)
		6/26/2015	
		1/1	
		1/1	
		1/1	
		1/1	

SUBTOTAL THIS PAGE	389.99
TOTAL THIS PERIOD (Only on last page of Schedule)	389.99
Enter this total on Col. 1, line 3 of Summary Page	

EXHIBIT B

#160



REGISTRY OF
ELECTION FINANCE

140 Walnut Street
Frankfort, Kentucky 40601-3240

RETURN SERVICE REQUESTED

7008 1830 0003 6515 9062



UNCLAIMED
8-13-18
8-18-18



RECEIVED
KY REGISTRY OF
ELECTION FINANCE
SEP - 8

#160



REGISTRY OF ELECTION FINANCE

140 Walnut Street
Frankfort, Kentucky 40601-3240

RETURN SERVICE REQUESTED

CHARLES LOVETT
PO BOX 11073
LOUISVILLE, KY 40251

NIXIE

402512002-1N

09/02/15

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
RETURN TO SENDER



UNCLAIMED

EXHIBIT C

September 17th, 2015

RECEIVED

2015 SEP 22 A 9:37

Ms. Emily Dennis,
General Counsel

KY REGISTRY OF
ELECTION FINANCE

Kentucky Registry of Election Finance
140 Walnut St.
Frankfort, Ky 40601

RE: CASE # 2015-114 (In re: Campaign Fund of Charles Lewett
for Kentucky Secretary of State, Charles Lewett, Candidate / Treasurer)

For whom it may concern, this letter is intended to serve
as the written response of Charles Lewett, in regards to
the above listed case and the findings therewithin.

① Findings for Criteria: KRS 121.120 (a)(h)

Response: I don't recall having ever received and reviewing
the document listed as Exhibit 1 (1 of 2 / 2 of 2) dated
February 2, 2015 as signed from Auditor David Simpson.
Furthermore, because there is no documented meeting proof that
I actually did receive said document, the findings should
be inadmissible. Further noting that this same information
would have been received during the candidate training, but
due to various reasons (week schedule for the 1st / 2nd meeting,
and 3rd attempt cancelled by your office, due to the heavy ~~the~~ snow
storm that ^{had} our state gridlocked for over a week.) was never
able to be conducted, I should not be held liable
for information that was not effectively delivered to me.

① Findings for Criteria: HRS 121.120 (b)(h)

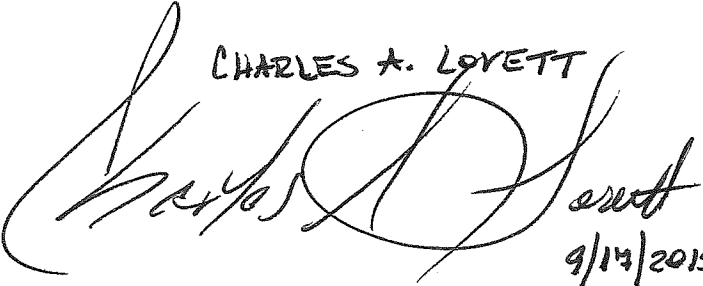
Response Cont'd:

That having been said, ~~As~~ it was stated in the findings; it wasn't until Mr. Cordier's courtesy phone call that I was made aware of the electronic filing. By that time, it was too late, as he was explaining the process and he intended to set up the electronic filing. It was decided at the time that I would be submitting the paper/written version, where he then walked me through what forms I would need to submit and how to properly fill in/complete the form.

② Findings for Criteria: HRS 121.220 (1) and (2)

Response: In conducting my campaign for Lieutenant Secretary of State, because I never sought to seek or campaign for donations, and as noted in my campaign finance report, having not spent very much money for my campaign; I didn't feel the need to open up a second bank account, as the money used for the campaign was of my personal money from my personal checking account. Further noting that I was not aware of this requirement either, as I was unable to attend the candidate training session, where I assume this information would have also been advised.

As this was my first campaign, and definitely
a learning process as to how to conduct a
major campaign; I take full responsibility for
my actions, or lack thereof, and respectfully accept
whatever decision the Registry puts forth, in reference
to the alleged findings.

CHARLES A. LOVETT

9/14/2015

PO Box 11073
Louisville, Ky 40251
(502) 314-1268