

ARKANSAS ETHICS COMMISSION  
910 WEST SECOND STREET, SUITE 100  
LITTLE ROCK, AR 72201  
Phone (501) 324-9600 Toll Free (800) 422-7773

CITIZEN COMPLAINT FORM

The undersigned person files this complaint and requests that the Arkansas Ethics Commission conduct an investigation concerning the facts and actions detailed below for the purpose of determining whether or not there has been a violation of laws under the Commission's jurisdiction.

1. Identify the person you are complaining about:

Name: Leslie Rutledge Position or Title: Attorney General  
Address: 323 Center St., Suite 200 Phone: (Home) \_\_\_\_\_  
Little Rock, AR 72201 (Work) (501) 682-2007

2. State in your own words the *detailed* facts and the actions of the person named in section 1 which prompted you to make this complaint. The brief space provided below is not intended to limit your statement of facts. Please use the back of this form or additional sheets if necessary. Include relevant dates, times, and the names, and addresses of other persons whom you believe have knowledge of the facts.

Please see attached statement of facts

3. Attach or make reference to any documents, materials, minutes, resolutions or other evidence which support your allegations.

State of Arkansas  
County of GRANT

I swear or affirm, under penalty of perjury, that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief.

Subscribed and sworn before me this  
1 day of FEBRUARY, 2016.

Signature: \_\_\_\_\_  
Print your name: Matthew Campbell

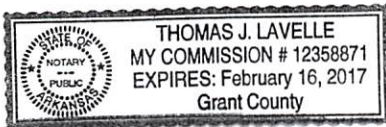
Notary Signature:  
Thomas J. Lavelle

Mailing address: PO Box 7469  
Little Rock, AR 72217

My Commission Expires: 2-16-17

Phone: (Home) \_\_\_\_\_ (Work) (501) 396-9246

Approved by the Arkansas Ethics Commission



Revised 06/01

Summary: Attorney General Leslie Rutledge traveled to Iowa on January 27 or 28, 2016, to assist with the final days of the Mike Huckabee presidential campaign in Iowa. In so doing, and by devoting time during normal business hours to Huckabee's campaign on January 28 and 29, as well as February 1, Ms. Rutledge violated Ark. Code Ann. 7-1-103.

Facts & Law: On January 29, 2016, the Arkansas Democrat-Gazette reported, "Thursday, Arkansas...Attorney General Leslie Rutledge arrived at Huckabee 2016 headquarters in Urbandale, Iowa, and prepared to join the final push." *See* "Huckabee looks for Iowa revival," Ark. Democrat-Gazette, Jan. 29, 2016 (attached as Exhibit 1).

The article made clear that Ms. Rutledge's purpose in traveling to Iowa was to assist Mr. Huckabee's campaign.

Thursday, Milligan and Rutledge had tickets to the night's Republican debates and were scheduled to appear and praise Huckabee's performance later in the evening.

Officials have printed "talking points" to help Huckabee surrogates make their case in the coming days, but Rutledge didn't refer to them as she praised Hope's most famous Republican earlier in the day.

"Gov. Huckabee's experience. No one can match it," she said, praising Huckabee's decade of leadership and his ability to work with Democrats as well as Republicans.

"That's what Americans are fed up with right now. They're fed up with government not working and the divisiveness that we see in Washington and he has a proven record of reaching across the aisle, working with people to get things done. ... He did amazing work in Arkansas and he needs the opportunity to do that across America."

*Id.*

Pictures of Ms. Rutledge attending campaign-related functions appeared on social media.

*See, e.g.,* Exhibit 2.

Under Arkansas law:

It shall be unlawful for any public servant, as defined in § 21-8-402, to devote any time or labor during usual office hours toward the campaign of any other candidate for office or for the nomination to any office.

Ark. Code Ann. 7-1-103(a)(2)(A)(i). "Public servant," as it is defined in 21-8-402, includes "all public officials, public employees, and public appointees." Ark. Code Ann. 21-8-402(18). "Public official" means "a legislator or any other person holding an elective office of any governmental body." Ark. Code Ann. 21-8-402(17). Thus, the prohibition in Ark. Code Ann. 7-1-103(a)(2)(A)(i) applies to Ms. Rutledge as a public official.

The "usual office hours" of the Arkansas Attorney General's office are 8 a.m. until 4:30 p.m., Monday through Friday. January 28, January 29, and February 1, 2016, were not state or federal holidays; accordingly, the Attorney General's normal office hours those days were 8 a.m. until 4:30 p.m. By "devot[ing] time or labor during usual office hours" on January 28, January 29, and/or February 1, 2016, Leslie Rutledsge has violated Ark. Code Ann. 7-1-103(a)(2)(A)(i).

Inasmuch as this complaint is proper under Ark. Code Ann. 7-6-218(a), is signed, and states facts constituting an alleged violation within the jurisdiction of the Arkansas Ethics Commission, I request that these violations be investigated pursuant to Ark. Code Ann. 7-6-218(b)(1)(A).



View Today's Arkansas Democrat-Gazette Print Edition

Login Register Subscribe Now

# ArkansasOnline



60°  
Little Rock

Search ArkansasOnline

FOLLOW US:

Home News Obituaries Business Entertainment Sports Photos Videos Features Events Classifieds Jobs Homes Autos

Crime Right2Know Traffic Archives News Tip Whole Hog Sports Arkansas Life Place an Ad Arkansas Daily Deal

Monday, February 01, 2016, 1:51 p.m.

### TOP PICKS

Capture Arkansas  
Upload photos and  
vote for your favorites  
in the Capture Arkansas  
contest.



Home / News /

## Huckabee looks for Iowa revival

### Arkansas friends join push

By Frank Lockwood  
This article was published January 29, 2016 at 5:45 a.m.

3



PHOTO BY AP / CHRIS CARLSON  
Former Arkansas Gov. Mike Huckabee makes a point during one of Thursday night's debates in Des Moines, Iowa. Huckabee won the Iowa caucuses eight years ago but trails in the polls this year.

### MOST POPULAR

Viewed Commented

- Madison County to get its first stoplight
- Madison County to get its first stoplight - Mobile
- One teen surrenders, one sought in killing of woman - Mobile
- 3 in Little Rock die in separate shootings
- 2nd teen arrested in Little Rock mother's slaying
- 3 in Little Rock die in separate shootings - Mobile

### SHOPPING

loading...  
Autos



2015 BMW X5  
\$66,275; 52 miles  
BMW of Little Rock  
Search 804 vehicles

Real Estate



Jacksonville; 2,964 sq/ft (4 BD, 3.1 BA) \$269,900; Staci Medlock - Crye-Leike REALTORS NLR Branch  
Search 16,069 homes

### RELATED ARTICLES

GOP debaters rip Trump, Clinton

Clinton, Sanders on debates fence

Huckabee attends forum, Trump rally

Comments (5)

Font Size

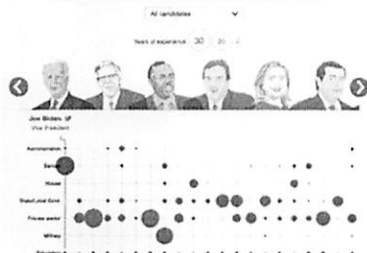
URBANDALE, Iowa -- Trailing badly in all of the polls, former Arkansas Gov. Mike Huckabee is counting on friends from Arkansas and voters in Iowa to help him shock the pollsters and keep his presidential hopes alive.

Borrowing a racetrack analogy, he says it's possible the front-runners will hit a wall or blow a tire before reaching Monday's finish line.

Thursday, Arkansas Treasurer Dennis Milligan and Attorney General Leslie Rutledge arrived at Huckabee 2016 headquarters in Urbandale, Iowa, and prepared to join the final push. They were joined by former South Carolina Lt. Gov.

### Potential candidates in the race for 2016

About a dozen Republicans and a handful of Democrats have expressed an interest in running for this year's 2016 presidential nomination. A look at their experience from political to private sector.



• INTERACTIVE: 2016 candidate tracker

### FEATURED JOBS

Lexicon, Inc.  
01.30.16 | Little Rock, AR

Course Builder/Trainer, Director of Study Abroad - Multiple Positions  
ASU HUMAN RESOURCES  
01.30.16 | West Memphis, AR

RN  
ARKANSAS SURGICAL HOSPITAL  
01.30.16 | North Little Rock, AR

College President  
COLLEGE OF THE OUACHITAS  
01.30.16 | Malvern, AR

Education  
PULASKI TECHNICAL COLLEGE



Former Arkansas Gov. Mike Huckabee holds a campaign event Tuesday at Faith Baptist Bible College in Ankeny, Iowa, as he makes a big push ahead of Mond...

## TODAY'S TOP HEADLINES



- 3 in Little Rock die in separate shootings
- 2nd teen arrested in Little Rock mother's slaying
- Huckabee slams rumor, denies he might endorse Trump
- Bama can't sway Hog commitment
- Arkansas hiker dies in 60-foot fall
- Huckabee parody video of Adele's 'Hello' grabs attention



## Huckabee looks for Iowa revival

Andre Bauer, Alabama Secretary of State John Merrill, *Home Improvement* actor Jimmy Labriola and a host of Huckabee's relatives.

"This is the insane part of the Iowa caucus as we get to the funnel," Huckabee said before exiting the office Thursday afternoon. "Every four years, nobody really knows what's going to happen until it happens."

Unlike eight years ago, when he won the Iowa caucuses, this time there aren't hordes of reporters trailing Huckabee wherever he goes.

Right now, he concedes, the throngs are chasing New York billionaire Donald Trump and U.S. Sen. Ted Cruz of Texas, focusing on that increasingly heated rivalry.

"There's a focus on that battle that is unquestionable, but there's also the possibility that people will say, 'I'm tired of that.' That's our strategy. In a NASCAR race, if you're driving around the track and there's some folks in front of you and they have a car wreck, you can go get the checkered flag," Huckabee said.

Finishing first isn't essential, he suggested.

"There are some of us that need to exceed the expectations, which for me, right now, are not high," he said. "There are others, for example, Cruz. If he doesn't win here, then this inevitability stuff is gone and I think he has as much to lose here as we do here."

Campaign staff members say they're reaching out to undecided voters and that there are positive signs as the vote nears.

"The last couple of days on the ground, we've seen more people coming to our events. I'd say the volume has been turned up a little bit. You can tell people are starting to make some decisions," said campaign senior adviser Chip Saltsman.

There's ground to make up between now and Monday.

"Look, we know where we are in the world. We're not the front-runner right now. We know we've got to close like a freight train, but the good news is there's been a lot of people in Iowa that's voted for him before and they know who he is," Saltsman said.

Sarah Huckabee Sanders, the governor's daughter and his campaign manager, said he needs "a strong showing," adding, "We need to beat expectations and I think we'll do it."

It's a good sign, she said, that so many volunteers are showing up at Huckabee headquarters.

Thursday, dozens of supporters traveled to the site, sandwiched between Midwest Mattress and Hungry Boyz restaurant, in strip-mall country 10 miles northwest of Des Moines.

As others loaded up on a free barbecue luncheon, Labriola, the actor and comedian, earnestly praised his friend from Arkansas.

The TV star appeared on Huckabee's TV show a few years ago; he says they quickly became pals.

"What I love about him is the realness. What you see is what you get and, obviously, he has a great sense of humor or I couldn't hang with him, no matter who he was," the New York native said. "I really believe he could be the Reagan of our time, what we really need. So I'm willing to do whatever I can."

Huckabee's Arkansas allies said they'll also do anything they can to help.

"If it means sweeping the floor, I'll be jumping in sweeping the floors," Milligan said. "Mike's been a great leader for Arkansas, a great influence on me and we're just proud to be up here helping him out any way that we possibly can. He's demonstrated a great ability to be able to lead our state

## Calendar

(<http://arkansasonline.com/eventcalen>)

### TORUK - The First Flight (Cirque du...)

Verizon Arena | North Little Rock, AR

FEB  
19

(<http://arkansasonline.com/eventcalen>)  
THE-FIRST-FLIGHT-CIRQUE-DU-  
SOLEIL-AT-VERIZON-  
ARENA/1735791/2016-02-19T19)

### Boot Camp

Jackson Community ... | Jacksonville, AR

MON  
1

(<http://arkansasonline.com/eventcalen>)  
CAMP/2018393/2016-02-01T00)

### Monday Movie Mania

William F. Laman P... | North Little Rock, AR

MON  
1

(<http://arkansasonline.com/eventcalen>)  
MOVIE-MANIA/2048459/2016-02-01T00)



Search Local Businesses

DIGITALMARKETING

- Central Arkansas Auto Sales
- Central Arkansas Banking
- Central Arkansas Beauty Care
- Central Arkansas Dentists
- Central Arkansas Florists
- Central Arkansas Insurance
- Central Arkansas Lawyers
- Central Arkansas Movers
- Central Arkansas Physicians
- Central Arkansas Restaurants
- Central Arkansas Real Estate

and I have no doubt in my mind he's very capable of leading our country."

Although Huckabee later joked about getting a broom for Milligan, campaign officials said Milligan's primary task, at least Monday evening, would be to speak on the candidate's behalf at one of the caucus sites.

Thursday, Milligan and Rutledge had tickets to the night's Republican debates and were scheduled to appear and praise Huckabee's performance later in the evening.

Officials have printed "talking points" to help Huckabee surrogates make their case in the coming days, but Rutledge didn't refer to them as she praised Hope's most famous Republican earlier in the day.

"Gov. Huckabee's experience. No one can match it," she said, praising Huckabee's decade of leadership and his ability to work with Democrats as well as Republicans.

"That's what Americans are fed up with right now. They're fed up with government not working and the divisiveness that we see in Washington and he has a proven record of reaching across the aisle, working with people to get things done. ... He did amazing work in Arkansas and he needs the opportunity to do that across America."

In addition to Arkansas elected officials, Huckabee family members also have been deployed and will speak on his behalf at caucus gatherings Monday evening.

The ex-governor's sister, Pat Harris of Bryant, said she's been told she can stray from the talking points, because "they'd rather we speak from our hearts."

The retired schoolteacher gave a similar speech here in 2008, the night Huckabee claimed victory.

Asked how her brother will do this time, Harris said "I truly have no idea. We're more about miracles than math, so we'll just have to see. All you can do is do your best, keep a happy face and keep rolling."

A Section on 01/29/2016

Print Headline: Huckabee looks for Iowa revival

Tweet 

Like Share 13 people like this. Be the first of your friends.

### More News

- School bus transporting students crashes near...
- Couple robbed at gunpoint, home set ablaze; d...
- Officials: Man who led escape had help from j...
- Iran says it flew drone over U.S. aircraft ca...
- Huckabee looks for Iowa revival**
- Panel strikes 'death of unborn child'
- Ex-Arvest exec gets prison stint
- Innocent of assault, woman says
- Death penalty sought in Bay slaying case

[More News stories >](#)

### We Recommend

by Taboola

**Registration open for history forum**

**2nd teen arrested in Little Rock mother's slaying**

**Voter turnout name of game in Iowa race**

**Tobias decides on Hogs**

EXHIBIT

2





**Leslie Rutledge for Arkansas**

January 29 at 12:23pm · 🌐

Will be live shortly on @FoxBusiness, talking @GovMikeHuckabee! Tune in! <https://t.co/MV1IKdIRMJ>



Leslie Rutledge (@LeslieRutledge) posted a photo on Twitter

Get the whole picture - and other photos from Leslie Rutledge

[PIC.TWITTER.COM/MV1LKDLRMJ](https://pic.twitter.com/MV1LKDLRMJ) | BY LESLIE RUTL...

Like

Comment

Share



2 people like this.



Write a comment...



**Leslie Rutledge for Arkansas**

January 29 at 12:09pm · 🌐

Catch me live on @FoxBusiness at 12:15 and hear why I'm supporting @GovMikeHuckabee. #IowaCaucus #arpx

Like

Comment

Share

