

# ARKANSAS ETHICS COMMISSION

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May 2, 2008

Graham F. Sloan  
 Director

Rita S. Looney  
 Chief Counsel

Robert L. Rodday  
 Staff Attorney

Todd Elder  
 Teresa Keathley  
 Directors of Compliance

Mr. Mike Huckabee  
 1134 Silverwood Trail  
 North Little Rock, Arkansas

COPY

Re: Case No. 2008-CO-004

Dear Mr. Huckabee:

On January 29, 2008, the Ethics Commission sent you a letter containing a copy of the citizen complaint filed against you in the above-referenced case. In that letter, the Commission notified you that an investigation was being commenced regarding the issue of whether or not you violated Ark. Code Ann. § 21-8-804(c) in your former capacity as Governor of Arkansas in connection with the disclosure of the receipt of monies used to purchase a portrait.

Specifically, the complaint referenced Act 239 of 2001 which requires the quarterly disclosure of gifts, grants, and donations of money or property received on behalf of the state by governors and certain other designated officials. The essential allegation is that you should have listed the name(s) of those who donated the monies used to purchase the portrait as the actual contributor(s) on your Quarterly Disclosure form for the 4<sup>th</sup> quarter of 2007 rather than listing the name of the artist of said portrait as the contributor. You subsequently signed a written Offer of Settlement and thereby acknowledged committing a violation of § 21-8-804(c).

As part of its disposition of this matter, the Commission is hereby issuing you this **Public Letter of Caution** which is advisory in nature and serves to give clear notice that your actions violated the law. You are advised not to engage in the same activity again.

This disciplinary action is taken pursuant to Ark. Code Ann. § 7-6-218(b)(4).

Sincerely,

Larry Ross  
 Chairman

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