

**Executive Summary and Staff Review/Analysis
Supporters of I-522
(Food Democracy Now! (FDN); Organic Consumers Association (OCA);
Organic Consumers Fund (OCF); Organic Consumers Fund Committee to
Label GMOs in Washington State (OCF-WA State PAC); Volunteers for
I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice
Cream)**

PDC Tracking No. T14-053

This summary highlights PDC staff's review and analysis, and makes recommendations concerning a portion of the allegations contained in PDC Tracking No. T14-053, a 45-day Citizen Action Complaint (Complaint) filed with the Attorney General on October 25, 2013, by Rob Maguire, an attorney with Davis, Wright, Tremaine, PLLC, a Seattle law firm, against several entities supporting I-522, a statewide initiative concerning the labeling of genetically modified foods and beverages on the November 5, 2013 general election ballot. On October 28, 2013, the Attorney General referred the Complaint against the numerous Supporters of I-522 for investigation and possible action into these allegations.

The Respondents named in complaint that are addressed in this summary are: Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream.¹

Allegations

The Citizen Action Complaint alleged that the Respondents listed in the Complaint against Supporters of I-522, as detailed below, violated RCW 42.17A as follows:

- A. **Failed to register as a political committee (RCW 42.17A.205).** The complaint alleged that FDN; OCA; OCF; and OCF-WA State PAC failed to timely register with the PDC as political committees in support to I-522. In addition, the complaint alleged that the websites of Volunteers for I-522 and 522Parents.org may have solicited contributions, since they indicated support of I-522 and discussed voting "yes" on the initiative, and that Volunteers for I-522 and 522Parents.org were likely political committees.

¹ The review addressed in this Executive Summary only concerns the entities and persons listed in the heading to this report. The Commission has previously addressed the allegations related to Respondents (Food Democracy Action!; Food Democracy Action! Yes on I-522 Committee to Label GMOs in Washington (FDA-WA State PAC); and Yes on I-522 Committee). Allegations against remaining Respondents will be addressed at a future time.

B. Failed to file reports of contribution and expenditure activities as a political committee (RCW 42.17A.235 and .240). The complaint alleged that FDN; OCA; OCF; OCF-WA State PAC; Volunteers for I-522; and 522Parents.org failed to file Cash Receipts Monetary Contributions reports (C-3 reports), and Campaign Summary Receipts & Expenditures reports (C-4 reports) disclosing contribution and expenditure activities undertaken as political committees in support of I-522.

C. Failed to include proper sponsor identification on political advertisements that supported I-522 (RCW 42.17A.320). The complaint alleged that Dr. Bronner's Magic Soaps and Ben & Jerry's Ice Cream sponsored political advertising in support of I-522, that failed to contain proper sponsor identification.

Applicable Statutes, Rules, and Interpretations

RCW 42.17A.005(37) defines "political committee" as "any person (except a candidate or an individual dealing with his or her own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition."

PDC Interpretation 07-02, *Primary Purpose Test Guidelines*, distills relevant case law and other legal guidance (AGO 1973 no. 14, *State v. Dan Evans Committee*, and *Evergreen Freedom Foundation v. Washington Education Association*) concerning the definition of "political committee" in RCW 42.17A.005(37). As discussed in the Interpretation, a person is a political committee if that person becomes a "receiver of contributions" to support or oppose candidates or ballot propositions, or if expenditures to support or oppose candidates or ballot propositions become one of the person's primary purposes.

RCW 42.17A.205 requires political committees to file a Committee Registration report (C-1pc report) with the PDC if they have the expectation of receiving contributions or making expenditures in support of or in opposition to any candidate or ballot proposition.

RCW 42.17A.235 and .240 require political committees to timely and accurately file reports of contributions and expenditures. Under the full reporting option, until five months before the general election, Campaign Summary Receipts and Expenditures reports (C-4 reports) are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election, and in the month following the election, regardless of the level of activity. Contribution deposits made during this same time period must be disclosed weekly on Cash Receipts Monetary Contributions reports (C-3 reports) on the Monday following the date of deposit.

RCW 42.17A.255 requires a person sponsoring independent expenditure advertising of \$100 or more to timely file an initial Independent Expenditure report (C-6 report) within five days after making an independent expenditure.

RCW 42.17A.320(1) requires all written political advertising, whether relating to candidates or ballot propositions, to include the sponsor's name and address. It also requires all radio advertisements to include the sponsor's name.

Results of Staff Review

Food Democracy Now! (FDN)

- FDN, through its attorney, Greg Wong with Pacifica Law Group, stated that FDN did not solicit or receive contributions to support I-522 in Washington State, and had no expectation of receiving contributions to support a Washington State ballot proposition in 2013. Mr. Wong stated that FDN did not make any contributions to FDA-WA State PAC or to Yes on I-522 Committee. PDC staff reviewed the FDN website and found a link, as noted in the Complaint, to donate to Food Democracy Action!, an organization related to FDN that is registered with the IRS as a 501(c)(4) organization. No evidence was found that FDN, which is registered with the IRS as a 501(c)(3) organization, solicited contributions for it to use to support I-522.

Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF- WA State PAC)

- OCF-WA State PAC timely filed a Political Committee registration, timely filed C-3 and C-4 reports throughout the 2013 election, and substantially complied with PDC reporting requirements. OCF-WA State PAC disclosed making a total of \$6,125 in expenditures to OCF for staff services to run the committee. No evidence was found that OCA or OCF solicited or accepted contributions, or was otherwise required to register as a political committee.

522Parents.Org

- 522Parents.org was a website created by two individuals, Michael Kovalenko and Maris Abelson, who spent a total of \$70, which included \$20 to purchase two domain names, and \$50 to print flyers promoting the 522parents.org website. 522Parents.org did not solicit or accept contributions. Staff found no evidence that 522Parents.org was a political committee.

Volunteers for I-522

- Volunteers for I-522 was a website created by Maggie Willson using her personal funds. Ms. Willson stated she did not solicit or accept contributions. On November 5, 2013, Ms. Willson (Volunteers for I-522) filed an Independent Expenditures Report (C-6 report) disclosing that she spent \$1,453 in personal funds in support of I-522. Ms. Willson filed the C-6 report 165 days late, and on April 17, 2014, PDC staff sent Ms. Willson a warning letter reminding her of the need to timely file all future PDC reports, including C-6 reports. Ms. Willson was told that if she participates in future campaigns and fails to timely file required reports, the Commission may take enforcement action against her and consider the circumstances surrounding the warning in evaluating future violations.

Dr. Bronner's Magic Soaps

- Dr. Bronner's Magic Soaps failed to include proper sponsor identification on political advertisements undertaken in support of I-522. The political advertising was included as part of labels on Dr. Bronner's soap products and in national magazine advertisements for Dr. Bronner's products. On April 16, 2014, in accordance with PDC practice, Dr. Bronner's Magic Soaps was sent a sponsor identification warning letter, advising them to include proper sponsor identification on all future political advertisements. Dr. Bronner's Magic Soaps was told that if political advertising in future campaigns fails to comply with sponsor identification requirements, the Commission may take enforcement action and consider the circumstances surrounding this warning in evaluating future violations.

Ben and Jerry's Ice Cream

- Ben and Jerry's Ice Cream failed to include the proper sponsor on political advertisements undertaken in support of I-522 that included billboard advertising. On April 16, 2014, in accordance with PDC practice, Ben and Jerry's Ice Cream was sent a sponsor identification warning letter, reminding them to include sponsor identification on all future political advertisements. Ben and Jerry's Ice Cream was told that if political advertising in future campaigns fails to comply with sponsor identification requirements, the Commission may take enforcement action and consider the circumstances surrounding this warning in evaluating future violations.

Staff Conclusion and Recommendation

After reviewing the Complaint and completing a preliminary investigation, staff determined a formal investigation was not warranted concerning the allegations against Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in

Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream.

PDC staff recommends that the Commission:

- 1) Enter an order dismissing the allegation that Food Democracy Now! (FDN) failed to register and report as a political committee, and recommend that the Attorney General take no further action on this matter regarding FDN;
- 2) Enter an order dismissing the allegation that Organic Consumers Association (OCA) failed to register and report as a political committee, and recommend that the Attorney General take no further action on this matter regarding OCA;
- 3) Enter an order dismissing the allegation that Organic Consumers Fund (OCF) failed to register and report as a political committee, and recommend that the Attorney General take no further action on this matter regarding OCF;
- 4) Enter an order dismissing the allegation that 522Parents.org failed to register and report as a political committee, and recommend that the Attorney General take no further action on this matter regarding 522Parents.org.
- 5) Enter an order dismissing the allegation that Volunteers for I-522 (Maggie Willson) failed to register as a political committee and to timely file a C-6 Report of Independent Expenditures (C-6 report); and recommend that the Attorney General take no further action on this matter regarding Volunteers for I-522;
- 6) Enter an order dismissing the allegation that Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC) failed to register and report as a political committee, and recommend that the Attorney General take no further action on this matter regarding OCF-WA State PAC.
- 7) Enter an order dismissing the allegation that Dr. Bronner's Magic Soaps sponsored political advertising in support of I-522 that failed to contain proper sponsor identification, and recommend that the Attorney General take no further action on this matter regarding Dr. Bronner's Magic Soaps; and
- 8) Enter an order dismissing the allegation that Ben & Jerry's Ice Cream sponsored political advertising in support of I-522 that failed to contain proper sponsor identification, and recommend that the Attorney General take no further action on this matter regarding Ben & Jerry's Ice Cream;

Enclosure:

- Supporters of I-522 Report of Investigation and Exhibits



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17 and RCW 42.17A

PDC Tracking No. T14-053

Supporters of I-522 (Food Democracy Now!
(FDN); Organic Consumers Association (OCA);
Organic Consumers Fund (OCF); Organic
Consumers Fund Committee to Label GMOs in
Washington State (OCF-WA State PAC);
Volunteers for I-522; 522Parents.org; Dr.
Bronner's Magic Soaps; and Ben & Jerry's Ice
Cream)

Report of Investigation

Respondents.

I.
Background

- 1.1 Initiative 522 (I-522) was filed as an initiative to the Washington State Legislature during the 2013 Legislative Session. If it had been approved, it would have required the labeling of Genetically Modified Organisms (GMOs) in certain food and beverages.
- 1.2 No action was taken by the Legislature concerning I-522, and as a result, the bill became an Initiative to the People following adjournment of the 2013 Legislative Session. It was placed on the November 5, 2013 general election ballot where it was defeated.
- 1.3 On February 11, 2013, Yes on I-522 Committee filed a C-1pc registering as a political committee in support of I-522.
- 1.4 On March 20, 2013, the Organic Consumers Fund Committee to Label GMOs in Washington State filed a C-1pc registering as a political committee in support of I-522. **See Exhibit #1.**
- 1.5 On October 25, 2013, the Attorney General's Office (AGO) received a 45-day Citizen Action Complaint (Complaint) filed in accordance with RCW 42.17A.765(4) by Rob Maguire, an attorney with Davis, Wright, Tremaine, PLLC, a Seattle law firm. The Complaint alleged

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)
PDC Tracking No. T14-053
Page - 2 -

that the several entities supporting I-522 failed to register as political committees and/or properly and timely report contribution and expenditure activities.¹ See **Exhibit #2**.

II. **Allegations & Results of Investigative Findings**

- 2.1 The complaint alleged that several supporters of I-522, including: Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream, may have violated:
- A. RCW 42.17A.205 by failing to timely file a Committee Registration report (C-1pc report) within two weeks of soliciting and/or accepting contributions, or otherwise meeting the definition of a political committee; and
 - B. RCW 42.17A.235, and .240 by failing to file, or timely file, Cash Receipts Monetary Contributions reports (C-3 reports) disclosing monetary contributions received, and Campaign Summary Receipts & Expenditures reports (C-4 reports) disclosing the receipt of in-kind contributions and monetary expenditures, as required by political committees supporting or opposing a ballot proposition.
 - C. RCW 42.17A.255 by failing to file, or timely file, Independent Expenditure reports (C-6 reports).
 - D. RCW 42.17A.320 by failing to include the proper sponsor identification on political advertisements that supported I-522.
- 2.2 Mr. Maguire also alleged that Food Democracy Action violated RCW 42.17A.205, .235 and .240 by failing to register and report as a political committee; and that Yes on I-522 Committee violated RCW 42.17A.235 and .240 by failing to timely disclose in-kind contributions received by a ballot measure committee. Those allegations were separately investigated as Case No. 14-007 and Case No. 14-011, respectively.
- 2.3 On November 12, 2013, Mr. Maguire responded to a staff email clarifying his earlier allegations against several of the Respondents. See **Exhibit #3**. The allegations and staff's review are detailed below:

Food Democracy Now! (FDN): Mr. Maguire alleged that FDN might be an unregistered political committee because of the activities mentioned on its website about supporting I-522 during the 2013 election.

¹ This Report of Investigation addresses only the findings relevant to the entities listed in the heading to this report. Investigative findings relevant to the other Respondents (Food Democracy Action!; Food Democracy Action! Yes on I-522 Committee to Label GMOs in Washington (FDA-WA State PAC), Case No. 14-007; and Yes on I-522 Committee, Case No. 14-011) are addressed in separate reports.

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)

PDC Tracking No. T14-053

Page - 3 -

- FDN, through its attorney, Greg Wong with Pacifica Law Group, stated that FDN did not solicit or receive contributions to support I-522 in Washington State, and had no expectation of receiving contributions to support a Washington State ballot proposition in 2013. Mr. Wong stated that FDN did not make any contributions to FDA-WA State PAC or to Yes on I-522 Committee. PDC staff reviewed the FDN website and found a link, as noted in the Complaint, to donate to Food Democracy Action!, an organization related to FDN that is registered with the IRS as a 501(c)(4) organization. No evidence was found that FDN, which is registered with the IRS as a 501(c)(3) organization, solicited contributions for it to use to support I-522.

Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC):

Mr. Maguire alleged that OCA and OCF might be unregistered political committees because their organizations and websites refer to fundraising events and I-522 related activities, and because OCF-WA State PAC failed to timely and accurately report its contribution and expenditure activities. Staff found that:

- OCF-WA State PAC timely registered and substantially complied with C-3 and C-4 reporting requirements throughout the 2013 election. One C-3 report disclosing a \$35,000 contribution received from OCA on October 17, 2013 was reported eight days late on October 29, 2013. OCF-WA State PAC stated that this instance of late reporting occurred because of coordination issues between OCF-WA State PAC and the accountant it hired to prepare its reports. OCF-WA State PAC also acknowledged that it failed to maintain a Washington State bank account or have an account separate from OCF. OCF-WA State PAC stated that this error was an unintentional technical oversight.
- OCF-WA State PAC disclosed making \$6,125 in expenditures to OCF for staff services. No evidence was found that OCA or OCF solicited or accepted contributions or were political committees.

Volunteers for I-522: Mr. Maguire alleged that the website associated with this name might demonstrate an unregistered political committee because the name expressly indicated support for I-522, the website referred to fundraising events and pro I-522 related activities, and the website may have solicited or accepted campaign contributions. Staff found that:

- Volunteers for I-522 was a website created by Maggie Willson using her personal funds, and did not solicit or accept contributions. No evidence was found that Ms. Willson created a political committee required to register and report with the PDC. On November 5, 2013, Volunteers for I-522 filed an Independent Expenditures Report (C-6 report) disclosing that Ms. Willson made \$1,453 in expenditures using personal funds in support of I-522. Ms. Willson filed the C-6 report late, and she was sent a warning letter on April 17, 2014 advising her of the need to file timely reports in future elections.

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)

PDC Tracking No. T14-053

Page - 4 -

522Parents.org: Mr. Maguire alleged that the website associated with this name might demonstrate an unregistered political committee because the name expressly indicated support for I-522, the website referred to fundraising events and pro I-522 related activities, and the website may have solicited or accepted campaign contributions. Staff found that:

- 522Parents.org did not solicit or accept contributions to support I-522, and was not a political committee. It was created by two individuals that expended a total of \$70, which included \$20 to purchase two domain names for the websites, and \$50 to print flyers promoting the 522parents.org website.

Dr. Bronner's Magic Soaps: Mr. Maguire alleged that Dr. Bronner's Magic Soaps products contained special labels promoting the passage of I-522, and that those labels, along with pro I-522 magazine advertisements, were not timely disclosed as in-kind contributions by the Yes on I-522 committee. He also alleged that the advertisements paid for by Dr. Bronner's Magic Soaps did not include any sponsor identification information indicating who paid for the labels and magazine advertisements. Staff found that:

- Dr. Bronner's Magic Soaps failed to include the proper sponsor identification on its political advertisements undertaken in support of I-522, including labels on Dr. Bronner's products and national magazine advertising for Dr. Bronner's products. Although the political advertisements did not contain proper sponsor identification, they were placed on products clearly identified as Dr. Bronner's products. On April 16, 2014, in accordance with PDC practice, Dr. Bronner's Magic Soaps was issued a sponsor identification warning letter, advising the organization to include sponsor identification on all future political advertisements.

Ben and Jerry's Ice Cream: Mr. Maguire alleged that Ben and Jerry's Ice Cream sponsored political advertisements in support of I-522 that were not timely disclosed as in-kind contributions by the Yes on I-522 committee, and that billboard advertisements did not include any sponsor identification information. Staff found that:

- Ben and Jerry's Ice Cream failed to include the proper sponsor identification on political advertisements undertaken in support of I-522, including billboard advertising. On April 16, 2014, in accordance with PDC practice, Ben and Jerry's Ice Cream was issued a sponsor identification warning letter, advising the organization to include sponsor identification on all future political advertisements.

III.

Findings

- 3.1 Political committees under the Full Reporting option participating in the 2013 general election were required to file C-3 reports weekly, starting June 1. These political committees were also required to file the following C-4 reports:

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)
PDC Tracking No. T14-053
Page - 5 -

- Monthly C-4 reports by the 10th of the month disclosing contribution and expenditure activities, if \$200 has been received or spent since the last C-4 report was filed.
- A 21-day pre-general election C-4 report due on October 15, 2013, covering the period September 1 through October 14, 2013;
- A 7-day pre-general election C-4 report due on October 29, 2013, covering the period October 15 through 28, 2013; and
- A post-general election C-4 report by December 10, 2013, covering the period October 29 through November 30, 2013.

Food Democracy Now! (FDN)

- 3.2 FDN is registered with the IRS as a 501(c)(3) organization. It is related to Food Democracy Action! (FDA) which is registered with the IRS as a 501(c)(4) organization, and which organized FDA-WA State PAC to support I-522. On November 8, 2013, PDC staff received a written response from Mr. Greg Wong, an attorney with Pacifica Law Group who represents both FDA and FDN. Mr. Wong stated that FDN did not solicit or receive contributions to support I-522 in Washington State, and had no expectation of receiving contributions to support a Washington State ballot proposition in 2013. No evidence was found that FDN received any contributions to support I-522 or that FDN made any contributions to FDA-WA State PAC or to Yes on I-522. **See Exhibit #4.**
- 3.3 Mr. Maguire alleged that FDN might be an unregistered political committee because of the activities mentioned on its website about supporting I-522 during the 2013 election.

FDN, through its attorney, Greg Wong with Pacifica Law Group, stated that FDN did not solicit or receive contributions to support I-522 in Washington State, and had no expectation of receiving contributions to support a Washington State ballot proposition in 2013. Mr. Wong stated that FDN did not make any contributions to FDA-WA State PAC or to Yes on I-522 Committee. PDC staff reviewed the FDN website and found a link, as noted in the Complaint, to donate to Food Democracy Action!, an organization related to FDN that is registered with the IRS as a 501(c)(4) organization. No evidence was found that FDN, which is registered with the IRS as a 501(c)(3) organization, solicited contributions for it to use to support I-522.

OCA; OCF; and OCF-WA State PAC

- 3.4 On October 30, 2013, PDC staff sent a letter to OCA, OCF, and OCA-WA State PAC concerning the Complaint. On November 8, 2013, PDC staff received an email from Mr. Greg Wong, an attorney with Pacifica Law Group who represents OCA, OCF, and OCFD-WA State PAC. **See Exhibit #5.** Mr. Wong attached four documents to his email that included a five-page response letter and three exhibits, consisting of: (1) Exhibit A: A C-1pc report filed by OCF-WA State PAC on March 20, 2013; (2) Exhibit B: A 456 page printout of the PDC contribution database for OCF-WA State PAC contributions

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)
PDC Tracking No. T14-053

Page - 6 -

received since March 20, 2013; and (3) Exhibit C: A two-page printout of the PDC contribution database for Yes on I-522 Committee OCF-WA State PAC contributions.

- 3.5 Staff reviewed information about OCA and OCF, which included the December 31, 2011 Combined Financial Report with Supplementary Information, stating that OCA is a nonprofit corporation focused on representing "...the views and interests of organic consumers by educating consumers on food safety, industrial agriculture, genetic engineering, corporate accountability, and environmental sustainability." The information stated that OCF "...was established to lobby for legislation, regulation, and programs to improve public health, the environment, and the economy."
- 3.6 Mr. Wong stated that OCA and OCF share employees, and said the shared employees' time is pro-rated between the two entities based on time spent and activities undertaken, in accordance with OCA's and OCF's goals and mission. He stated that OCF and OCF-WA State PAC shared the same bank account, and that OCA has a separate bank account.

OCF and OCF-WA State PAC

- 3.7 Mr. Wong stated, "Every contribution that OCF received or gave in support of I-522 properly went through the OCF Washington PAC." He stated that OCF is registered with the Internal Revenue Service as a 501(c)(4) organization. OCF-WA State PAC filed a C-1pc report on March 20, 2013, registering with the PDC and disclosing its support of I-522.
- 3.8 Based on staff's review of the PDC database, OCF-WA State PAC timely disclosed its contribution and expenditure activity totaling \$799,896 raised and spent, with one exception. One C-3 report disclosing a \$35,000 contribution from OCA was filed eight days late on October 29, 2013. OCF-WA State PAC stated that this instance of late reporting occurred because of coordination issues between OCF-WA State PAC and the accountant it hired to prepare its reports.
- 3.9 The committee's expenditures included \$740,000 in monetary contributions made to the Yes on I-522 Committee. OCF-WA State PAC disclosed making an additional \$6,125 in expenditures to OCF for staff services received.
- 3.10 Mr. Maguire made a statement in his complaint concerning matching funds or contributions by Dr. Bronner's Magic Soaps and Mercola.com. Mr. Wong stated that OCF-WA State PAC did not receive any contributions from either Dr. Bronner's Magic Soaps or Mercola.com. He said he believed the two entities made monetary contributions directly to the Yes on I-522 committee, matching the OCF-WA State PAC monetary contributions once they had been disclosed as a contributor on C-3 reports.
- 3.11 Mr. Wong stated that OCF-WA State PAC activities and the matching funds issues concerning Dr. Bronner's Magic Soaps and Mercola.com were not coordinated directly with the Yes on I-522 committee.

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)

PDC Tracking No. T14-053

Page - 7 -

OCA

- 3.12 Mr. Wong stated that OCA is registered with Internal Revenue Service as a 501(c)(3) organization. He stated that OCA did not make any contributions to OCF-WA State PAC, or to Yes on I-522 Committee, and had no expectation of receiving contributions to support any candidates or ballot propositions. Mr. Wong stated the OCA did not receive any campaign contributions during 2013.
- 3.13 Mr. Wong stated that OCA receives donations for non-political, organizational purposes, but said none of those funds are spent or otherwise earmarked for any candidate or ballot proposition. He stated that the OCA newsletter mentioned I-522 and urged its members/readers to support its passage, but he noted that the link to the website made "...it clear that any contributions to the legislative efforts would go to OCF."

Supporters of I-522 websites

- 3.14 Mr. Maguire alleged that two websites, Volunteers for I-522 and 522Parents.org, supported the passage of I-522, and may indicate the existence of two unregistered political committees, since their names suggested their primary purpose was to support I-522. He alluded to the fact that the two websites referred to fundraising events and other related activities in support of I-522, and he questioned whether the websites accepted contributions in support of I-522.

522Parents.org:

- 3.15 On November 1, 2013, staff sent an email to Michael Kovalenko, one of two individuals listed as contacts on the 522parents.org website (along with Maris Abelson), informing him about the complaint filed by Mr. Maguire and requesting him to respond to the allegations concerning the website. On November 4, 2013, Mr. Kovalenko sent an email to staff stating that the 522parents.org website was created on April 9, 2013, by him and Ms. Abelson. **See Exhibit #6.** Mr. Kovalenko stated the website was developed to counter what he and Ms. Abelson felt were false claims being made by the GMO industry and No on 522 Committee.
- 3.16 Mr. Kovalenko stated that he made no significant expenditures for the website, and that he used \$20 in personal funds to purchase two domain names for the websites 522parents.org and 522parents.com. He stated that they spent another \$50 to print flyers promoting the 522parents.org website, and said there were essentially no costs other than the domain names and the printing costs for the flyer.
- 3.17 Mr. Kovalenko stated that he incurred no unique web hosting fees because he hosts many other domain names as part of his work. He stated that they did not coordinate the website activities in support of I-522 with the Yes on I-522 Committee and the website did not solicit any contributions on their behalf. He reiterated that the website did not solicit or accept any contributions at any time for any purpose.

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)
PDC Tracking No. T14-053
Page - 8 -

Volunteers for I-522:

- 3.18 On November 1, 2013, PDC staff sent an email to Maggie Willson and Volunteers for I-522 concerning Mr. Maguire's allegations about the Volunteers for I-522 website. **See Exhibit #7.** During that correspondence, Ms. Willson confirmed that she sponsored the Volunteers for I-522 website as an individual using her personal funds.
- 3.19 Ms. Willson stated that she did not solicit or accept contributions to help pay for the website, had no expectation of receiving contributions from any person, and did not sponsor the website in consultation or coordination with the Yes on I-522 Committee.
- 3.20 On November 5, 2013, Maggie Willson/Volunteers for I-522 filed an Independent Expenditures Report (C-6 report) disclosing \$1,453 in expenditures made by Ms. Willson using her personal funds, in support of I-522. **See Exhibit #8.** The C-6 report disclosed the following expenditures: (A) \$101 to GoDaddy.com on May 16, 2013 for eight website domain names that directed internet traffic to the Volunteers for I-522 website; (B) \$278 to Costco Business Center on August 28, 2013, for flyers and bumper stickers; (C) \$483 to Buildasign on August 28, 2013, for bumper stickers; (D) Two expenditures totaling \$297 to Yes!Books for GMO educational pamphlets and CDs; and (E) \$294 in small non-itemized expenditures under \$100.
- 3.21 In accordance with RCW 42.17.255, Ms. Willson was required to file an initial C-6 report within five business days of expending \$100 or more in personal funds to purchase the eight website domain names, or not later than May 23, 2013. The C-6 report disclosed Ms. Willson's independent expenditure information 165 days late.
- 3.22 In addition, Ms. Willson was required to file an August C-6 report no later than September 10, 2013, disclosing \$1,352 to print flyers and bumper stickers, and to purchase GMO educational pamphlets and other small non-itemized expenditures. Ms. Willson noted that only \$127 of the initial expenditure to Yes!Books should have been included on the C-6 report, since the remaining GMO-related materials totaling \$170 were not used to support I-522.
- 3.23 Staff found no evidence of prior reporting violations by Ms. Willson and no evidence she solicited or accepted contributions to help pay for her activities supporting I-522. Staff also noted that Ms. Willson made the expenditures using personal funds and without coordinating her activities with the Yes on I-522 Committee. Based on these circumstances, on April 18, 2014, Ms. Willson was sent a warning letter instead of formal enforcement action.

Dr. Bronner's Magic Soaps

- 3.24 The Complaint also alleged that: (1) Dr. Bronner's Magic Soaps products carried special labels that promoted the passage of I-522; that the advertisements solicited contributions that would support I-522; and that none of the labels contained proper sponsor identification; (2) Dr. Bronner's Magic Soaps sponsored political advertisements in

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)
PDC Tracking No. T14-053

Page - 9 -

support of I-522, that appeared in national magazines like Mother Jones, that were not reported, and failed to contain proper sponsor identification; and (3) Dr. Bronner's Magic Soaps made anonymous pledges to OCA-WA State PAC and Label it Washington, and that those two committees failed to timely report the pledges.

- 3.25 During the 2013 election cycle, Yes on I-522 Committee disclosed receiving monetary and in-kind contributions totaling \$2,302,881 from Dr. Bronner's Magic Soaps, of which seven monetary contributions totaled \$2,225,000, received between April 1 and October 29, 2013. Yes on I-522 Committee disclosed receiving five in-kind contributions from Dr. Bronner's Magic Soaps totaling \$77,881, that included: (A) \$45,635 for political advertising for labels on products received on July 8, 2013; (B) \$20,000 for June and July 2013 Legal Services; and (C) \$12,246 for political advertisements appearing in three magazines, and received on October 15, 2013. The ads appeared in Mother Jones (\$4,900); The Nation (\$5,846); and Progressive (\$1,500).
- 3.26 On December 9, 2013, Joseph E. Sandler with Sandler, Reif, Young & Lamb, PC, a Washington DC law firm, submitted an email on behalf of his client, All One God Faith, Inc., d/b/a Dr. Bronner's Magic Soaps, stating that the advertisement appeared in Mother Jones magazine in mid-October 2013. **See Exhibit #9.** He confirmed the \$4,900 cost of the ad in Mother Jones magazine, and said the cost of the advertisement was communicated to Yes on I-522 Committee as an in-kind contribution.
- 3.27 Staff noted the advertisements were similar to Dr. Bronner's Magic Soaps normal advertisements and labels, which has a unique branding label making it instantly recognizable as being from Dr. Bronner's Magic Soaps. However, the inner portion of the label contained information supporting I-522, and discussed Yes on I-522 Committee.
- 3.28 On February 25, 2014, Dr. Bronner's Magic Soaps filed a Special Political Expenditures report (C-7 report) disclosing reportable monetary and in-kind contributions made during calendar year 2013, that included contributions to Label It Washington, Yes on I-522 Committee and Moms for Labeling.
- 3.29 On April 16, 2014, PDC staff issued a sponsor identification warning letter to Dr. Bronner's Magic Soaps, advising them to include proper sponsor identification on all future political advertisements.

Ben and Jerry's Ice Cream

- 3.30 The Complaint also alleged that Ben and Jerry's Ice Cream sponsored political advertisements that included billboard ads in support of I-522 that failed to be reported as in-kind contributions by the Yes on I-522 Committee. The complaint alleged that the advertisements failed to contain proper sponsor identification.
- 3.31 On April 16, 2014, PDC staff issued a sponsor identification warning letter to Ben and Jerry's Ice Cream, advising them to include proper sponsor identification on all future political advertisements, including billboard ads.

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)
PDC Tracking No. T14-053
Page - 10 -

IV.
Scope

- 4.1 PDC staff reviewed the 45-day Citizen Action Complaint filed by Rob Maguire against a number of Supporters of I-522.
- 4.2 PDC Staff reviewed the following:
- Campaign finance reports filed by Yes on I-522 Committee, and information contained in the PDC database.
 - Campaign finance reports filed by OCA-WA State PAC.
 - The website for Food Democracy Now!
 - Written response from Greg Wong on behalf of Food Democracy Now!
 - The websites for Volunteers for I-522 and 522Parents.org, and information on the Internet concerning OCA and OCF.
 - November 18, 2013, email with attachments from Greg Wong, an attorney with Pacifica Law Group, representing OCA, OCF, and OCF-WA State PAC.
 - November 4, 2013, email from Michael Kovalenko concerning the 522parents.org website.
 - November 1, 2013, email from PDC staff to Maggie Willson, (Volunteers for I-522), and October 31, 2013 telephone log from Mr. Perkins.
 - C-6 report filed by Maggie Willson and Volunteers for I-522.

V.
Laws

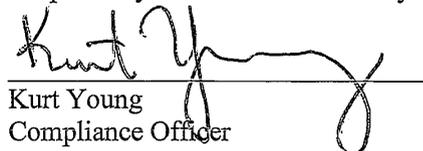
- 5.1 **RCW 42.17A.005(37)** states, "Political committee" means any person (except a candidate or an individual dealing with his or her own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition. In addition,
- 5.2 **PDC Interpretation 07-02, Primary Purpose Test Guidelines**, distills relevant case law and other legal guidance (AGO 1973 no. 14, *State v. Dan Evans Committee*, and *Evergreen Freedom Foundation v. Washington Education Association*) concerning the definition of "political committee" in RCW 42.17A.005(37). As discussed in the Interpretation, a person is a political committee if that person becomes a "receiver of contributions" to support or oppose candidates or ballot propositions, or if expenditures to support or oppose candidates or ballot propositions become one of the person's primary purposes.
- 5.3 **RCW 42.17A.005(42)(b)(i)** defines sponsor for purposes of a political committee, to be any person, except an authorized committee, from whom the committee receives eighty percent or more of the committee's contributions.

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)
PDC Tracking No. T14-053

Page - 11 -

- 5.4 **WAC 390-16-011A** states that a sponsored political committee must amend its C-1pc sixty days before an election in which it participates if the committee's name on its most recently filed C-1pc does not include at least one current sponsor.
- 5.5 **RCW 42.17A.005(42)(b)(i)** requires all political committees to identify the sponsor in the name on the Committee Registration (C-1pc), if eighty percent of the committee's contributions are from any one person. In accordance with WAC 390-16-011A, the requirement does not apply to contributions made within 60 days of an election for an existing committee.
- 5.6 **RCW 42.17A.205** requires every political committee to file a statement of organization within two weeks after organization or within two weeks after the date the committee first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier.
- 5.7 **RCW 42.17A.235 and .240** require political committees to timely and accurately file reports of contributions and expenditures. Under the full reporting option, until five months before the general election, Campaign Summary Receipts & Expenditures reports (C-4 reports) are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election, and in the month following the election, regardless of the level of activity. Contribution deposits made during this same time period must be disclosed weekly on Cash Receipts Monetary Contributions reports (C-3 reports) due on the Monday following the date of deposit.
- 5.8 **RCW 42.17A.255** requires a person sponsoring independent expenditure advertising of \$100 or more to timely file an initial Independent Expenditure report (C-6 report) within five days after making an independent expenditure.
- 5.9 **RCW 42.17A.320(1)** requires all written political advertising, whether relating to candidates or ballot propositions, to include the sponsor's name and address. It also requires all radio advertisements to include the sponsor's name.

Respectfully submitted this 15th day of May, 2014.


Kurt Young
Compliance Officer

Supporters of I-522 (Food Democracy Now! (FDN); Organic Consumers Association (OCA); Organic Consumers Fund (OCF); Organic Consumers Fund Committee to Label GMOs in Washington State (OCF-WA State PAC); Volunteers for I-522; 522Parents.org; Dr. Bronner's Magic Soaps; and Ben & Jerry's Ice Cream)
PDC Tracking No. T14-053
Page - 12 -

List of Exhibits

- Exhibit #1** March 20, 2013, C-1pc filed by OCA–WA State PAC in support of I-522.

- Exhibit #2** October 25, 2013, 45-day Citizen Action Complaint filed by Rob Maguire, an attorney with Davis, Wright, Tremaine, PLLC, a Seattle law firm, against several entities supporting I-522.

- Exhibit #3** November 8, 2013 letter from Greg Wong on behalf of FDN.

- Exhibit #4** November 12, 2013, email from Mr. Maguire clarifying his earlier allegations against several of the Respondents that are supporters of I-522.

- Exhibit #5** November 18, 2013, email with attachments from Greg Wong, an attorney with Pacifica Law Group, representing OCA, OCF, and OCF-WA State PAC.

- Exhibit #6** November 4, 2013, email from Michael Kovalenko concerning the 522parents.org website.

- Exhibit #7** November 1, 2013, email from PDC staff member Tony Perkins to Maggie Willson, and October 31, 2013 telephone log from Mr. Perkins concerning the complaint by Mr. Maguire and the Volunteers for I-522 website.

- Exhibit #8** November 5, 2013, C-6 report filed by Maggie Willson and Volunteers for I-522.

- Exhibit #9** December 9, 2013, letter from Joseph E. Sandler with Sandler, Reif, Young & Lamb, PC, in Washington DC, responding on behalf of his client, Dr. Bronner's Magic Soaps.

 PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 Toll Free 1-877-601-2828		Political Committee Registration		C1PC (1/12)		100518023 03-20-2013	
Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.) ORGANIC CONSUMERS FUND COMMITTEE TO LABEL GMOS IN WASHINGTON STATE				Acronym:			
Mailing Address 603 STEWART STREET #819				Telephone: 206-382-5552			
City SEATTLE		County KING		Zip + 4 98101		Fax: 206-381-8597 E-mail: PHIL@SEATTLECFO.COM	
NEW OR AMENDED REGISTRATION? <input checked="" type="checkbox"/> NEW. Complete entire form. <input type="checkbox"/> AMENDS previous report. Complete entire form.				COMMITTEE STATUS <input type="checkbox"/> Continuing (On-going; not established in anticipation of any particular campaign election.) <input checked="" type="checkbox"/> <u>2013</u> election year only. Date of general or special election: <u>11/05/2013</u> (Year)			
1. What is the purpose or description of the committee? <input type="checkbox"/> Bona Fide Political Party Committee - official state or county central committee or legislative district committee. If you are not supporting the entire party ticket, attach a list of the names of the candidates you support.							
<input checked="" type="checkbox"/> Ballot Committee - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure: REGARDING FOOD LABELING						Ballot Number <u>522</u> FOR <input checked="" type="checkbox"/> AGAINST <input type="checkbox"/>	
<input type="checkbox"/> Other Political Committee - PAC, caucus committee, political club, etc. If committee is related or affiliated with a business, association, union or similar entity, specify name:							
For single election-year only committees (not continuing committees): Is the committee supporting or opposing (a) one or more candidates? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, attach a list of each candidate's name, office sought and political party affiliation. (b) the entire ticket of a political party? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, identify the party:							
2. Related or affiliated committees. List name, address and relationship. <input type="checkbox"/> Continued on attached sheet.							
3. How much do you plan to spend during this entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. (If your committee status is continuing, estimate spending on a calendar year basis.) If no box is checked you are obligated to use Full Reporting. See instruction manuals for information about reports required and changing reporting options. <input type="checkbox"/> MINI REPORTING Mini Reporting is selected. No more than \$5,000 will be raised or spent and no more than \$500 in the aggregate will be accepted from any one contributor.							
<input checked="" type="checkbox"/> FULL REPORTING Full Reporting is selected. The frequent, detailed campaign reports mandated by law will be filed as required.							
4. Campaign Manager's or Media Contact's Name and Address ALEXIS BADEN-MAYER 1832 BILTMORE STREET NW #4, WASHINGTON DC 20009				Telephone Number: 202-744-0853			
5. Treasurer's Name and Address. Does treasurer perform only ministerial functions? Yes ___ No <u>X</u> . See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet. PHILIP LLOYD 603 STEWART STREET #819, SEATTLE WA 98101				Daytime Telephone Number: 206-382-5552			
6. Persons who perform only ministerial functions on behalf of this committee and on behalf of candidates or other political committees. List name, title, and address of these persons. See WAC 390-05-243 and next page for details. <input type="checkbox"/> Continued on attached sheet.							
7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer." <input type="checkbox"/> Continued on attached sheet. RONALD CUMMINS, CHAIR, 6771 SOUTH SILVER HILL DRIVE, FINLAND MN 55603 PHILIP LLOYD, SECRETARY/TREASURER, 603 STEWART STREET #819, SEATTLE WA 98101							
8. Campaign Bank or Depository NORTHSHORE FEDERAL C.U.		Branch SILVER BAY		City SILVER BAY, MN			
9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address. Street Address, Room Number, City where campaign books will be available for inspection 603 STEWART STREET #819, SEATTLE In order to make an appointment, contact the campaign at (telephone, fax, e-mail): 206-382-5552 206-381-8597 PHIL@SEATTLECFO.COM							
10. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters. <input checked="" type="checkbox"/> A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.				11. Signature and Certification. I certify that this statement is true, complete and correct to the best of my knowledge. Committee Treasurer's Signature Date PHILIP LLOYD 03-20-2013			



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Suite 2200 PUBLIC DISCLOSURE COMMISSION
1201 Third Avenue
Seattle, WA 98101-3045

Robert J. Maguire
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(206) 757-7094 fax

robmaguire@dwt.com

October 25, 2013

The Honorable Robert Ferguson
Attorney General
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100

Washington Public Disclosure Commission
Ms. Andrea McNamara-Doyle
P.O. Box 40908
Olympia, WA 98504-0908

The Honorable John Tunheim
Thurston County Prosecuting Attorney
2000 Lakeridge Dr. S.W., Building 2
Olympia, WA 98502

Re: Supporters of I-522

Dear Attorney General Ferguson, Thurston County Prosecuting Attorney Tunheim, and Ms. McNamara-Doyle:

On behalf of No on 522, we are writing to provide information concerning violations of Washington public disclosure laws by supporters of I-522. While No on 522 is reluctant to go down this path, No on 522 thinks it is important to bring these matters to your attention for a fair and balanced enforcement of the law. Please show this complaint the same attention and urgency as the allegations made by supporters of I-522.

A. Supporters of I-522 Have Failed to Register and Report as Political Committees and Failed to Comply with Washington's Public Disclosure Laws

Under the Attorney General and PDC's interpretation of the political committee test, key supporters of I-522 are carrying on activities, including accepting contributions and making expenditures in support of I-522, without registering and reporting as a political committee. If the State's view of the law is accurate, these entities' failure to register violates RCW

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October 25, 2013
Page 2

42.17A.205 and WAC 390-16011. Because they are not registered and reporting, they are also violating numerous sections of RCW 42.17A and Title 90 of the Washington Administrative Code which require reporting of expenditures and contributions, sponsors, and top five contributors.

We understand the AG and PDC staff believe that an organization is subject to political committee registration and required to report contributions and expenditures if the organization receives any contributions that may be used to support or oppose a ballot measure in Washington.¹ Under that view, several organizations should be required to register and report as political committees because they have apparently received contributions and made expenditures supporting I-522.

1. Food Democracy Now! and Food Democracy Action!

Food Democracy Now!² is raising money for an affiliated 501(c)(4) named Food Democracy Action! for the express purpose of passing along all of the contributions to Yes on 522. *See* Exhibit A.³ Food Democracy Now!'s solicitation expressly states:

Every dollar you donate will go to the YES on I-522 campaign.

The solicitation also states:

All money raised for this campaign will *go through Food Democracy Action!*, a 501(c)(4) allied organization of Food Democracy Now!, focused on grassroots lobbying and legislative action. Donations are not tax deductible.

Exhibit A (emphasis added).

Plainly, Food Democracy Action! is acting as a conduit for Yes on 522, in violation of RCW 42.17A.470. In addition, the solicitation demonstrates that Food Democracy Action! is accepting

¹ No on 522 respectfully believes the State's interpretation of the political committee test is overbroad and conflicts with more recent U.S. Supreme Court authority making clear that the primary or major purpose of an organization must be to engage in electoral activities to qualify as a political committee, however, No on 522 recognizes the State has a different view so raises the issues in this letter based on the State's interpretation of the law.

² *See* <http://fooddemocracynow.org/about/>.

³ Exhibit A was found at: https://fdn.actionkit.com/donate/stop_Monsanto_and_the_GMA_lie_machine_today/?akid=1025.312465.fkDGms&rd=1&t=2

October 25, 2013
Page 3

contributions earmarked for Yes on 522. As a result, the individual contributors to Food Democracy Action! should be reported by Yes on 522 as the true source of the contributions.

Food Democracy Action! has also failed to register as a Washington political committee. Because it is accepting contributions intended to support a Washington ballot measure, it is required (under the theory the State is pursuing against GMA) to register and report its activities as a Washington political committee.

Because Food Democracy Action! has not registered and reported as a political committee, there is no way of knowing from public records whether the true source of earmarked contributions to Food Democracy Action! have been disclosed by Yes on 522. Yes on 522 has reported two separate \$50,000 contributions from Food Democracy Action!, which suggests the individual contributors were not disclosed. Failure to report earmarked contributions violates RCW 42.17A.460.

2. The Organic Consumers Association and Related Entities

The Organic Consumers Association is a Minnesota-based 501(c)(3) corporation with a self-described national and international policy board. *See* <http://www.organicconsumers.org/aboutus.cfm>. The Organic Consumers Association has raised money directly for Yes on 522. (*See, e.g.*, Exhibit B). It has also solicited money *for itself* with an appeal to contribute *for purposes of supporting I-522*. (*See, e.g.*, Exhibit B, p. 4). And it has raised money to oppose GMO labeling, including through appeals to support I-522, through its affiliated Minnesota based Organic Consumers Fund, which describes itself as an allied organization with the Organic Consumers Association. *See* <http://organicconsumersfund.org/donate/> and (Exhibit C).

The exhibits to this letter include just some of the examples of activities by the Organic Consumers Association and Organic Consumers Fund demonstrating an expectation of receiving contributions supporting I-522. For example, on August 8, 2013, the Organic Consumers Association's website identified I-522 and solicited contributions to both the Organic Consumers Association ("tax deductible, helps support our work on behalf of organic standards, fair trade and public education") and the Organic Consumers Fund ("non-tax-deductible, but necessary for our legislative efforts in Washington, Vermont, and other states"). (Exhibit C). To be clear, these solicitations were for the OCA and its national fund, not for an existing affiliated Washington political committee.⁴ Under the State's interpretation of RCW 42.17A.005(37), the Organic Consumers Association and Organic Consumers Fund should, therefore, have registered

⁴ Notwithstanding the solicitations were for contributions to OCA and the national fund, if OCA instead directly deposited the funds in a Washington political committee, it may have violated the law by failing to obtain donor consent.

October 25, 2013
Page 4

as political committees because they had “the expectation of receiving contributions or making expenditures in support of” I-522. This is similar to the claim the AG is currently pursuing against the Grocery Manufacturers Association. Put simply, under the State’s view of the law, if an association solicits and receives money from members who reasonably expect some of their funds will be used to support I-522, the association or its fund is a political committee. In the OCA’s case, it solicited funds for itself (not a separate strategic fund or Washington political committee) without registering and reporting as a political committee.

There is further evidence indicating the OCA’s solicitations resulted in contributions to OCA. In particular, the Organic Consumers Association itself contributed \$128,000 to a Washington political committee called the Organic Consumers Fund Committee to Label GMOs in WA State (the “Washington Fund”). Presumably these funds were a result of the Organic Consumers Association’s solicitations of its members to support I-522 and the identity of the particular member contributors should be disclosed.

The Washington Fund, in turn, has contributed all of its funds (except credit card and accounting fees) to the Yes on 522 Committee. According to reports filed with the PDC (Exhibit D, the Washington Fund has collected and passed through \$580,000 to Yes on 522. The transactions raise questions under RCW 42.17A.435.

The Organic Consumers Association is not acting independently in this conduct. It is coordinating with Yes on 522 while also sponsoring its own Washington political committee. (See, e.g., Exhibit E). In the “action center” of the Organic Consumers Association’s website entitled “Millions Against Monsanto,” the Organic Consumers Association includes a link to Yes on 522’s website.⁵ The Organic Consumers Association also provided form letters soliciting contributions directly to Yes on 522.⁶ Similarly, using a mailing list the Organic Consumers claims includes 850,000 members,⁷ OCA solicited money for supporting I-522. (Exhibit I).

The structure used by the OCA and Yes on 522 has served as a basis for Yes on 522 to misleadingly claim that 80% of its contributions come from within Washington (Exhibit J) because the Washington Fund is registered as a Washington political committee. Contributors to the Washington Fund are almost all from outside of Washington, however. Indeed, the Washington Fund has collected more than 4,500 contributions from outside of Washington with fewer than 400 coming from within Washington. That is, more than 92% of the Washington

⁵ <http://www.organicconsumers.org/monsanto/links.cfm>. (Exhibit F).

⁶ For example, see form letter on OCA’s website containing the subject line: “Please contribute to the Yes on 522 campaign to label GMOs in Washington State.”
http://salsa3.salsalabs.com/o/50865/p/dia/action3/common/public?action_KEY=11846. (Exhibit G).

⁷ See <http://www.organicconsumers.org/aboutus.cfm>. (Exhibit H).

October 25, 2013
Page 5

Fund's contributions are from out-of-state. Those out-of-state contributors provided more than 94% of the funds the Washington Fund has received. Many of the contributions even come from outside of the United States raising serious questions as to whether foreign nationals are contributing to the Yes side in violation of federal law.⁸

The Washington Fund has also failed to properly comply with the PDC's requirements to have a Washington bank account allowing the PDC to easily scrutinize banking activities. Under the PDC's Instruction Manual for Political Committees at p. 9, the Washington Fund's bank account should "be established in a bank, mutual savings bank, savings and loan association or credit union doing business in Washington State." Contrary to the PDC's direction, however, the Washington Fund's account is with Northshore Federal Credit Union in the Silver Bay, Minnesota branch. Northshore Federal Credit Union does not have a branch in Washington.⁹ By using a financial institution outside of Washington, the Washington Fund places its banking and accounting outside the State's jurisdiction.

In addition to protecting the activities described above, there are other reasons to be concerned with the Washington Fund's banking activities. According to Northshore Federal Credit Union, its members must be "[p]ersons who reside, work, worship, or go to school in Lake or Cook Counties, Minnesota," surviving spouses of members, or immediate family members of current credit union members. See <http://www.northshorefcu.org/Mem%20Elig.htm>. Under those requirements, it is unclear how a Washington political committee could hold an account at Northshore Federal Credit Union. It is possible, therefore, there is no separate account for the Organic WA Fund and that it shares an account with its Minnesota parent entity.

The activities by and relationship between Yes on 522, the Washington Fund, the Organic Consumers Association, and the Organic Consumers Fund raises issues under Washington's disclosure law including whether major contributors to Yes on 522 have failed to register and report as political committees.

3. Volunteers for I-522

⁸ The Washington Fund lists scores of contributors with foreign addresses. It is not possible to tell from the Washington Fund's PDC filings whether it has ensured the donors are U.S. citizens or lawful permanent residents. If the donors are not U.S. citizens or lawful permanent residents, the Washington Fund has violated the Federal Election Campaign Act. Under federal law, the Washington Fund was required to return any funds from foreign nationals or, within 10 days of receipt, take steps to confirm the contribution was lawful by obtaining copies of current and valid U.S. passport papers for U.S. citizens providing a foreign address. 11 C.F.R. §1110.20.

⁹ According to its website, Northshore Federal Credit Union's three branches are in Silver Bay, Grand Marais, and Lutsen, Minnesota See <http://www.northshorefcu.org/contact.htm>

October 25, 2013
Page 6

A group calling itself Volunteers for I-522 has a website supporting I-522, including descriptions of events by the organization and links to “allies” such as the Organic Consumers Association, Yes on 522, and 522parents.org. See <http://volunteersfori522.org/>. The website includes a calendar with speaking tours and fundraising events¹⁰ and media releases directing individuals to Yes on 522’s website. The Volunteers for I-522 website also invites people to contact Volunteers for I-522 to “participate in actions, banner, volunteer and voter outreach, and phonebanking.” *Id.* The website does not include any sponsor or top five contributor disclosures and Volunteers for I-522 is not registered as a political committee. As a result, Volunteers for I-522’s funding and expenditures have not been publicly disclosed, in violation of Washington law.

4. 522Parents.org

522Parents.org is not registered as a political committee, does not report its expenditures and contributions, and does not provide the mandatory disclaimers on its website. See <http://522parents.org/>. The website promotes I-522 and provides links to the Label It WA political committee’s now defunct website.

B. Supporters of I-522 are Violating Washington Law By Failing to Provide Mandatory Disclaimers and Top Five Contributor Disclosures.

Supporters of I-522 routinely failed to label their advertisements in accordance with Washington law. Specifically, supporters of I-522 routinely fail to include the sponsor and top five contributor disclaimers required under RCW 42.17A.320, WAC 390-18-010, and WAC 390-18-015.

For example, a billboard appearing in Tukwila at the W. Valley Highway and 180th Avenue with the Yes on 522 logo and Ben & Jerry’s logo and the text “Vote Yes on 522 to support mandatory GMO labeling” does not contain sponsor information or the top five contributors.¹¹ (Exhibit K)

Similarly, Yes on 522’s e-mail communications have routinely failed to comply with disclosure requirements throughout the campaign. For example, we include as (Exhibit L) a May 29, 2013, e-mail from Yes on 522’s campaign manager offering a coupon for Ben & Jerry’s ice cream to the first 52 recipients to share Yes on 522’s Facebook page. The e-mail does not contain any sponsor or top five disclosures.

¹⁰ For example, a “GMO Labeling Fundraiser featuring Pamm Lary with Special Guest Jeffrey Smith” scheduled for October 1. https://www.google.com/calendar/embed?src=jkodrsfvd7affcrvsd20hrmj80@group.calendar.google.com&ctz=America/Los_Angeles&gessionid=sRyes27QU1aX9fwVTbKZeQ. (Exhibit Q).

¹¹ A photograph of the billboard, taken on August 17, 2013, is attached as (Exhibit K).

October 25, 2013
Page 7

In August, a Yes on 522 advertisement appeared in Mother Jones magazine. The advertisement, attached as (Exhibit M), contained an advertisement for Dr. Bronner's Magic Soap with rhetoric supporting I-522, solicitations for contributions, requests to vote for I-522, a Yes on 522 logo, and links to Yes on 522's website. The same advertisement has been placed on bottles of Dr. Bronner's Magic soap.¹² Despite the voluminous text in the advertisements, nothing discloses the sponsor or the top five contributors behind the advertisements.¹³

The pattern of failing to disclose continued. On September 9, 2013, representatives of Yes on 522 attended the 25th District Democrats meeting and passed out Yes on 522 flyers without the mandatory disclosures. (Exhibit N). The next day, on September 10, 2013, the Yes on 522 campaign manager again sent an e-mail solicitation seeking 1,000 donors to match an apparently anonymous (and likely unreported) pledge. The e-mail failed to include any sponsor or top five disclosures. (Exhibit O).

Even Yes on 522's website is deceiving. Yes on 522 recently added the sponsor and top 5 disclaimers to its website but has done so in a half-tone/screened manner making the disclaimers difficult to read. See <http://yeson522.com/> (Exhibit P). As a result, the website continues to violate RCW 42.17A.320, WAC 390-18-010, and WAC 390-18-015.

We have included only a sampling of advertisements violating Washington law. Indeed, it is more difficult to find examples of Yes on 522 advertisements complying with the law than not.

C. Supporters of I-522 are Violating Washington Law by Failing to Properly Report Pledges and In-Kind Contributions.

Supports of I-522 frequently refer to anonymous pledges to help generate matching contributions and enlist the support of businesses and lawyers to promote I-522 without reporting in-kind contributions. The pledges and in-kind contributions, however, have been accepted but not been reported – either as anonymous contributions, pledges, or in-kind contributions. As a result, the committees have violated RCW 42.17A.220 and .235.

For example, in late March or early April, 2013, the Organic Consumers Association posted a message to its Facebook page referring to a \$750,000 previously anonymous pledge to Label it WA contributed by Dr. Bronner's Magic Soaps. Although the Organic Consumers Association is not registered as a Washington political committee, it wrote:

¹² See <http://drbrunner.com/drbronnners-yes-on-522-label.php>

¹³ The main page of Dr. Bronner's website also includes an advertisement for Yes on 522, which links to Yes on 522's website. Again in violation of Washington law, the advertisement does not indicate the sponsor or top five contributors. <http://drbrunner.com/>

October 25, 2013
Page 8

Thanks to everyone's amazing response to *our campaign*, Dr. Bronner's Magic Soaps, who was our anonymous donor, has gone public with their support and will now be donating \$750k to the I-522 campaign, instead of the \$500k they originally planned to donate. So, between the \$250k we raised, and the \$750k Dr. Bronner's is donating, that's \$1 million for the Label it Wa campaign.

(Exhibit R) (emphasis added).

Likewise, on August 1, 2013, the Organic Consumers Association's website included a section entitled Support the OCA & OCF referring to a matching \$150,000 grant (pledge) from Mercola.com. (Exhibit S). The Mercola.com pledge was not reported.¹⁴

More recently, the Smith & Lowney law firm has provided legal services for Yes on 522 beyond compliance assistance, thereby violating WAC 390-17-405. *See, e.g.*, (Exhibit T) from <http://www.spokesman.com/blogs/spincontrol/2013/sep/25/i-522-fight-over-pet-food/> (identifying Knoll Lowney as attorney for the Yes campaign responding to questions on the substance of the initiative) and (Exhibit U) (Lowney letter to broadcasters on behalf of Yes on 522). The legal services, which apparently include creating Moms for Labeling (an entity that waited more than a month after formation to register as a political committee) for purposes of supporting I-522, should have been reported as expenditures (if paid) or in-kind contributions. Moms for Labeling has also failed to include the name of its sponsor in the name of the committee. WAC 390-16-011A. Moms for Labeling has received all of its funding from Dr. Bronner's Magic Soaps. As a result, Dr. Bronner's Magic Soaps is the sponsor whose name must be included in the committee's name. RCW 42.17A.005(42)(b). The relationship between Dr. Bronner's and the various committees supporting I-522 is also suspect, as a sponsor may not sponsor multiple committees or make independent expenditures while also sponsoring a committee. Dr. Bronner's is the sole contributor to Moms for Labeling, is one of the largest contributors to Yes on 522, assisted the Organic Consumers Association as an anonymous donor, and has also been promoting Yes on 522 through its own advertising on Dr. Bronner's products. *See, e.g.*, (Exhibit M). It is unclear whether Dr. Bronner's labels were unreported independent expenditures or in-kind contributions.

Other groups similarly appear to be contributing unreported services. For example, FUSE appears to be providing services to Yes on 522 by issuing press releases and FUSE's executive director serving as a media spokesperson for Yes on 522. *See, e.g.*, (Exhibit V) from

¹⁴ As with previously discussed items on the Organic Consumers Association's website, the article solicited contributions to the Organic Consumers Association and to the Organic Consumers Fund.

October 25, 2013
Page 9

<http://www.kirotv.com/news/news/big-money-battle-over-gmo-labeling-initiative/nZzfp/>. To the extent FUSE or its officers and directors are making expenditures supporting I-522, its contributions should be reported. The failure to report all of this information conceals the relationship between the various entities and individuals manipulating public opinion in support of I-522 and violates public disclosure laws.

D. Conclusion

Supporters of I-522 are routinely violating Washington disclosure laws and misleading the public. Even without discovery and the resources available to the State through its investigatory powers, No on 522 has identified a broad and deep range of violations by supporters of I-522. No on 522 respectfully requests the State investigate the allegations, which are far more widespread than the allegations raised against opponents of I-522, and ensure supporters of I-522 comply with the law.

Sincerely

Davis Wright Tremaine LLP



Robert J. Maguire

Attachments

DWT 22536313v2 0098080-00001

Exhibit A

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Monsanto's going all in, Will You?

Your Donation Today Will be Matched 3 to 1!

Breaking: A new poll in Washington state shows the race to win Yes on 522 to label GMOs is getting ton close to call! **Right now GMO labeling advocates maintain a narrow lead at 45 to 38% and we need your help!** Just like in California during Prop 37, the opposition's deceitful ad campaign is confusing voters.

With your help we can win this important GMO labeling battle in Washington State. Join us to say Yes on 522, a citizens' initiative to label GMOs in Washington State. Every dollar you donate will go to the YES on 1-522 campaign. Thank you!

Can you make a donation to support the fight against Monsanto to win GMO labeling! Every dollar counts!

3-TO-1 MATCH

YOUR DONATION TODAY WILL BE TRIPLED!



1 Enter Your Information

NAME
EMAIL
BILLING ADDRESS
CITY
STATE
ZIP

Please select your country:

UNITED STATES

All money raised for this campaign will go through Food Democracy Action!, a 501(c)(4) allied organization of Food Democracy Now!, focused on grassroots lobbying and legislative action. Donations are not tax-deductible.

To donate via Paypal, please click here:



If you prefer to donate with a check or money order, please send to:
Food Democracy Action! | P.O. Box 5 | Clew Lake, Iowa | 50428

Thank you!

2 Choose U.S. Dollar Amount

Donation Amount		
\$5.22	\$35	\$52.20
\$100	\$250	\$522
\$1000	Other \$	

Donation Type: One-Time Monthly

3 Enter Credit Card Information

Credit Card #
Verification Code Expiration Date



SUBMIT DONATION

Why do you need my occupation and employer?

Washington State law requires us to collect and report the name, mailing address, and the contribution amount for each individual whose contributions exceed \$25 and the employer and occupation for each individual whose contributions exceed \$100 in an election cycle. Your

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contribution will be used in connection with Washington State
and is subject to the limits and prohibitions of the Washington State
Public Disclosure Commission.

What if I'm retired or unemployed? In order to comply with the
WSPDC Commission, please note in the occupation section that you are
retired or unemployed.

[Privacy](#) [Contact](#)

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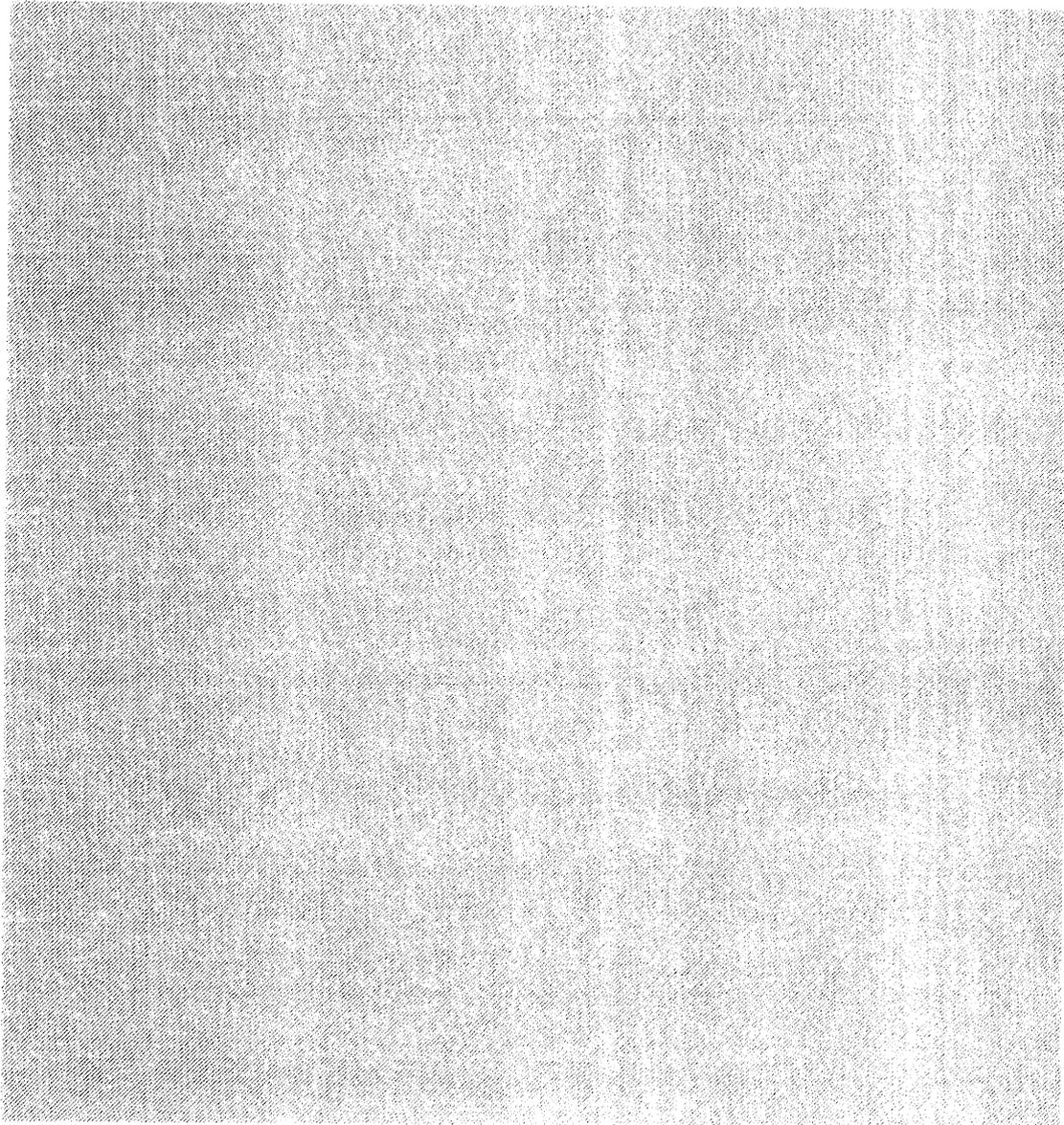


Exhibit B

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PUBLIC DISCLOSURE COMMISSION



HOME TAKE ACTION SUBSCRIBE ABOUT US FIND ORGANICS DONATE

Washington News & Action

STATE MAP

Search OCA

Follow OCA:



GET LOCAL!

Find Local News, Events & Green Businesses on OCA's State Pages:

Choose Your State

Submit News & Orgs

Submit Green Businesses

OCA NEWS SECTIONS

Organics

Organic Transitions

Save Organic Standards

Bodycare

Clothes

Biodynamics

The Myth of Natural

Planting Peace

Agriculture & Climate

CAFOs vs. Free Range

Health Issues

Swine & Bird Flu

Vitamins & Supplements

Children's Health

Genetic Engineering

rBGH

Millions Against Monsanto

Cloning & Patenting

Nanotechnology

GM Wheat

Food Safety

USDA Watch

NATIONAL CAMPAIGNS

Get Involved: Millions Against Monsanto



WASHINGTON CAMPAIGNS

Yes on 522: The People's Right to Know Genetically Engineered Food Act

<http://yeson522.com>

Grassroots activists in Washington State gathered over 350,000 signatures to get I-522, the People's Right to Know Genetically Engineered Food Act on the Nov. 2013 ballot. Initial polling shows that Washington state voters will likely pass this Ballot Initiative, no matter how much money the biotech industry and large food corporations put into an anti-labeling campaign.

I-522 already has strong support from Washington farmers, ranchers, and dairies, both organic and conventional, who are up in arms about the economic and environmental threats posed by genetically engineered wheat, apples, and alfalfa. Plus, Washington is far smaller than California in terms of population and registered voters and boasts a powerful network of co-ops, independent natural food stores, and grassroots organizations who are already fully on board with the campaign.

This fall, it's up to us to decide. Let's vote for the right to know what's in our food. Yes on 522!

Use these links to get involved, donate to the campaign, and spread the word:

Get Involved

Donate

Facebook

Twitter

Learn More Here

Submit News Stories

[Return to Top of Page](#)

WASHINGTON MILLIONS AGAINST MONSANTO CHAPTERS

Chapters are organized by Congressional District and listed by number. If you don't know which district you're in, click here.

- District 1
- District 2
- District 3
- District 4
- District 5
- District 6
- District 7
- District 8
- District 9
- District 10

Additional Facebook Chapters

Millions Against Monsanto Washington

GREEN PRODUCT SEARCH

Washington Green and Organic Businesses

All Products

within 20 miles of

Zip code:

Search:

[Add a Green Business](#)

[Click here to submit and see upcoming events!](#)

LATEST WASHINGTON NEWS

Show All

09/16/13 - This Week's Newsletter: Monsanto, Dupont Dump Millions to Stop GMO Labeling

09/11/13 - Poll: Big Lead for Food-labeling Initiative in WA

09/11/13 - Monsanto Puts \$4.6 Million into Fight Against GMO Labeling

09/04/13 - Putting Fear on the Table—Industry Lies and Damn Lies About GMOs and GMO Labeling

08/28/13 - Food Companies Ante up Against GMO Initiative

08/22/13 - Who's Paying for GMO-labeling Initiative Campaigns?

08/14/13 - Cross-country Drive Aims to Show There's Something 'fishy' About GMOs

08/02/13 - Washington GMO Labeling

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Toxic Sludge	
Raw Milk	
Mad Cow	Audubon Washington
Irradiation	Bicycle Alliance of Washington
Perchlorate	Cascade Harvest Coalition
<hr/>	
Fair Trade/	Climate Solutions
Social Justice	Cookus Interruptus
Buy Local Movement	EarthShare Washington
<hr/>	
Farm Issues	Environment Washington
NAIS	Foods Not Lawns Inland Northwest
Honey Bees	Fresh Abundance
<hr/>	
Politics & Democracy	Friends of the Trees Society
Publications	Futurewise
<i>Organic Bytes</i>	The Future is Organic
<i>Organic View</i>	Green Your Theme
<hr/>	
Resources	League of Women Voters of Washington
OCA Sponsors	Marra Farm (Seattle)
Buying Guide	Neighborhood Farmers Market Alliance
OCA Action Center	Olympia Seed Exchange
OCA Press Center	Organic Seed Alliance
OCA En Español	Organically Grown Company
<hr/>	
	Partnership for a Sustainable Methow
	PCC Farmland Trust
	PCC Natural Markets
	People for Puget Sound
	Plant a Row for the Hungry
	P-Patch Community Gardens (Seattle)
	The Real Food Challenge - Northwest
	Transition Fidalgo & Friends
	Rural Roots
	Seattle Tilth Association
	Sharing Wheels Community Bicycle Co-op
	Silver Valley Community Resource Center
	Sno-Valley Tilth
	South Whidbey Tilth
	Spokane Farmer's Market
	Spokane Tilth
	Sustainable NE Seattle
	Tilth Producers of Washington
	Transition Olympia
	Transition Snoqualmie Valley
	Transition Whatcom
	Transition Whidbey
	UW Fair Trade Coffee Coalition
	Washington Biotechnology Action Council
	Washington Citizens for Resource Conservation
	Washington State Department of Agriculture Organic

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Food Program
Washington Environmental Council
Washington Raw Milk
Washington Sustainable Food and Farming Network
Washington Tilth
Washington Toxics Coalition
WSU Center for Sustaining Agriculture and Natural Resources
WSU Extension Small Farms Team

Add an Organization

Organic Consumers Association · 6771 South Silver Hill Drive, Finland MN 55603 · Contact Us · Activist or Media Inquiries: 218-226-4164 · Fax: 218-353-7652
Please support our work: Send a tax-deductible donation to the OCA

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Exhibit C

From: Organic Consumers Association
Sent: Thursday, August 8, 2013 6:47 AM

Reply To: ronniecummins@organicconsumers.org
Subject: Torturing Animals with GMO Feed, 'Natural' GMO Chips?

Is this email not
displaying correctly?
[View it in your browser.](#)



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ESSAY OF THE WEEK

Are We Torturing Animals with Monsanto's GMO Feed?

We associate food with, at most, pleasure, at the very least, survival. It's not too different for animals. Lambs turned out on new grass move "quickly over certain grasses to get to others – to nosh on clover and mustard grass, avoiding horse nettle and fescue along the way," writes Dan Barber in *A Chef Speaks Out*. Wild pigs, capable of seeking out the nutrients they need, "enjoy eating nuts, roots, fruits, mushrooms, bugs, rabbits, and, occasionally, dead animals."



But what happens when animals are confined in cramped, filthy environments and force-fed monoculture diets of genetically modified corn and soy?

A lot can happen. Calves are born too weak to walk, with enlarged joints and limb deformities. Piglets experience rapidly deteriorating health, a "failure to thrive" so severe that they start breaking down their own tissues and organs – self-cannibalizing – to survive. Many animals suffer from weak, brittle bones that easily fracture. Dairy cows develop mastitis, a painful udder infection. Beef cattle develop liver abscesses and an excruciating condition referred to as "twisted gut."

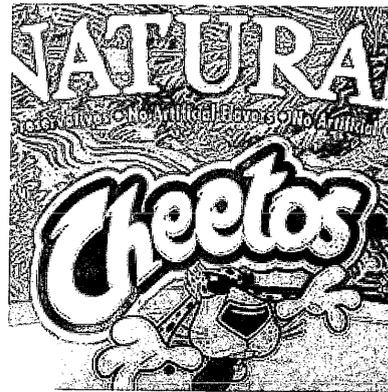
It all adds up to a lot of misery for the animals. And it doesn't bode well for humans, says the author of *America's Two-Headed Pig*.

[Read the essay](#)

ACTION ALERT

Tell the FDA: GMOs Aren't 'Natural'!

Would you be shocked to learn that the corn in the "all natural" tortilla chips you just bought had been genetically engineered to produce a toxin that ruptures the intestines of insects? Causing them to die quickly after ingesting the corn? Or that the corn in the "100% natural" cereal flakes you just served your kids for breakfast had been saturated with far more glyphosate than any normal plant would be able to tolerate? Because the corn was engineered to resist Monsanto's RoundUp herbicide?



The Food & Drug Administration (FDA) says "natural" means "nothing artificial or synthetic ... has been included in, or has been added to, a food that would not normally be expected to be in the food." So who would guess that food marketed as "natural" contains the engineered genes of insecticide-producing and/or herbicide-resistant bacteria?

So far the FDA has dodged the question of whether or not food companies are lying to customers when they say their product is "natural" even though it contains genetically engineered ingredients. But with the courts facing a barrage of lawsuits from consumers furious that food companies have been allowed to hide GMOs in popular "natural" brands, the FDA is being asked to weigh in.

Given that the FDA's Deputy Commissioner for Foods is none other than Monsanto's former lawyer, Michael Taylor, whose side do you think the FDA will take?

TAKE ACTION: Tell the FDA that GMOs Aren't "Natural"!

ORGANIC RETAIL AND CONSUMER ALLIANCE

Top Grocer Spotlight: Jimbo's . . . Naturally!

Fifteen years ago, Jimbo Someck, grocer and father, had one small organic store and one big mission: "A piece of organic fruit in every child's recycled lunch bag."

Today, Jimbo's . . . *Naturally!* is a thriving San Diego-based company with four locations, and a fifth in the works. The store and its owner have also become known as a champions of consumers' right to know about GMOs. Not only does the company educate consumers about the dangers of GMO ingredients, but it also works with manufacturers to find alternative ingredients.

Those manufacturers who are willing to transition to GMO-free are rewarded with Jimbo's continued business. Those who aren't are shown the door.



Last year, Jimbo's contributed \$10,000 to California's Proposition 37 campaign to label GMOs. And even though the California-based company doesn't operate any stores in Washington State, Jimbo's has donated \$10,000 to help pass I-522, a GMO labeling initiative on the ballot this November in Washington.

For all these reasons and more, Jimbo's earned a spot on the list of OCA's Top 'Diligent Dozen' Right to Know Grocers.

[More about Jimbo's . . . *Naturally!*](#)

[More about the Right to Know Grocers Contest](#)

SUPPORT THE OCA & OCF

Platitudes.

If at first you don't succeed. Patience is a virtue. The wheels of change grind slowly.

Don't give up the ship.

We've heard them all. And so have you. There's been no shortage of platitudes in our conversations around consumers' quest for GMO labeling laws.

Last year this time all eyes, including yours and ours, were on California and Proposition 37, a citizens' initiative to label GMOs. A



year later, with GMO labeling laws now on the books in Connecticut and Maine, all eyes are on Washington State's I-522 Label GMOs initiative.

We need more than platitudes. We need a win on the west coast to connect the dots with Maine and Connecticut. We need a law, one initiated by consumers, that doesn't contain trigger clauses requiring three or four other states to pass GMO laws before it takes effect.

We need to win in Washington State. And we need your help to do it. Because despite what they say – that all things come to those who wait – we know we can't just sit back and wait. We have to work. And it's your support that makes our work possible. Thank you!

Donate to the Organic Consumers Association (*tax-deductible, helps support our work on behalf of organic standards, fair trade and public education*)

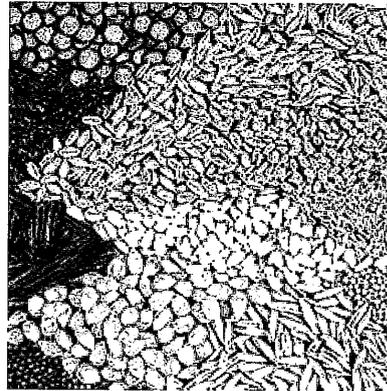
Donate to the Organic Consumers Fund (*non-tax-deductible, but necessary for our legislative efforts in Washington, Vermont and other states*)

ORGANIC INDEX 8.8.13

GMO Seeds and the Global Market: Can You Say 'Monopoly'?

One glance at the statistics and it's clear: The U.S. and Monsanto dominate the global market for genetically engineered crops. Forty percent of the world's genetically modified (GM) crops are grown in the U.S., where Monsanto controls 80 percent of the GM corn market, and 93 percent of the GM soy market.

Worldwide, 282 million acres are planted in Monsanto's GM crops, up from only 3 million in 1996, according to Food and Water Watch. Forty percent of U.S. cropland, or 151.4 million acres, are planted in Monsanto's crops. Monsanto owns 1,676 seed, plant and other applicable patents.

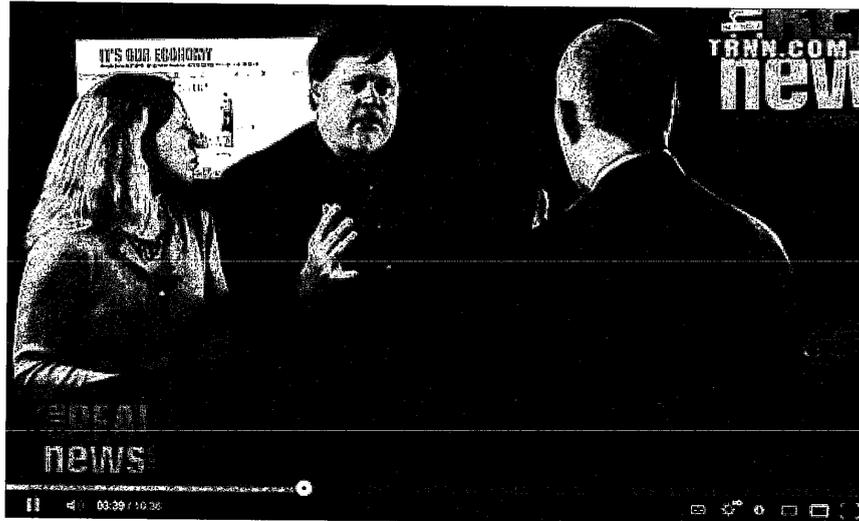


Maybe it's time we ask ourselves: How long will we tolerate the growing monopolization and genetic engineering of seeds by a monopolistic pesticide company that poses a deadly threat to our health, our environment and the future of our food?

More Facts on GMO Seeds and Monsanto

VIDEO OF THE WEEK

The Mother of All Trade Agreements. And Why You Should Care.



The Trans Pacific Partnership (TPP). It's not really about trade. It's about creating a back door for corporations to get what they want. What do they want? Bigger profits. Lower food safety standards. Fewer rights and lower pay for workers. Fewer environmental regulations. Fast and loose financial regulations. Internet censorship. Did we mention bigger profits?

[Watch the video](#)

[Learn more](#)

[TAKE ACTION: Tell President Obama and U.S. Trade Rep. Michael Froman: Trade Agreements Shouldn't Be Secret!](#)

LITTLE BYTES

Essential Reading for the Week

[Fair Trade Labels: Some Good News, a Challenge and a Call for Transparency](#)

[Cancer: Forbidden Cures](#)

[You, Yes You Can Afford Wholesome and Organic Food](#)

[Fracking the Commons: Why Your Public Lands Are Under Assault by Oil and Gas Drilling](#)

[5 Surprising Genetically Modified Foods](#)

[The Killing Fields: Industrial Agriculture, Dead Zones and Genetically Engineered Corn](#)



MESSAGE FROM OUR SPONSORS

Aloha Bay Certified Organic Bath Salts

Aloha Bay's USDA certified Himalayan Bath Salt is guaranteed to be one of the most relaxing baths of your life. Crystal salt from Aloha Bay's fair trade factory in Pakistan blended with organic essential oils of Cedar from the same Himalayan mountain range, fresh pressed California orange, Bulgarian Lavandin and Clary Sage with just a hint French Rosemary.



[Learn More](#)

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Please forward this publication to family and friends, place it on web sites, print it, duplicate it and post it freely. Knowledge is power!

Organic Bytes is a publication of [Organic Consumers Association](#)

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Supporter

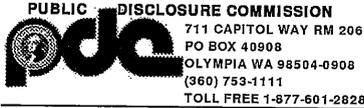
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your city, your state your zip code

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Exhibit D



**SUMMARY, FULL REPORT
RECEIPTS AND
EXPENDITURES**

C4
(3/97)

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100522962

Candidate or Committee Name (Do not abbreviate. Include full name)
Organic Consumers Fund Committee to Label GMOs in WA State (Organic Consumers

Mailing Address
603 Stewart St Ste 819 City **Seattle, WA**

Zip + 4
98101

Office Sought (Candidates)
 Election Date
2013

Report Period Covered From (last C-4) To (end of period) Final Report?
04/01/13 04/30/13 Yes No **X**

*For PACs, Parties & Caucus Committees: During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)
 *See next page Yes No

RECEIPTS

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		\$	176,862.62
2. Cash received (From line 2, Schedule A)	\$	126,941.00	
3. In kind contributions received (From line 1, Schedule B)		0.00	
4. Total cash and in kind contributions received this period (Line 2 plus 3)		126,941.00	
5. Loan principal repayments made (From line 2, Schedule L)		0.00	
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	-70.00	
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	-70.00	
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		303,733.62	
9. Total pledge payments due (From line 2, Schedule B)		0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		1,092.66
11. Total cash expenditures (From line 4, Schedule A)		186,022.64
12. In kind expenditures (goods & services) (From line 1, Schedule B)		0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		186,022.64
14. Loan principal repayments made (From line 2, Schedule L)		0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	-70.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	-70.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		187,045.30

CANDIDATES ONLY				CASH SUMMARY	
	Won	Lost	Unopposed	Name not on ballot	
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Cash on hand (Line 8 minus line 17)
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	[Line 18 should equal your bank account balance(s) plus your petty cash balance.]
Treasurer's Daytime Telephone No.:					19. Liabilities: (Sum of loans and debts owed)
(206) 382-5552					20. Balance (Surplus or deficit) (Line 18 minus line 19)
					116,688.32
					11,274.37
					105,413.95

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
Organic Consumers Fund Committee to Label GMOs in WA	05/10/13	Philip Lloyd	04/30/13

CASH RECEIPTS AND EXPENDITURE

SCHEDULE **A**
to C4
(11/93)

RECEIVED
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION

Candidate or Committee Name (Do not abbreviate. Use full name.) Organic Consumers Fund Committee to Label GMOs in WA State (Organic Report Date 04/01/13 04/30/13

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
04/01/2013	24,692.88	04/19/2013	1,000.50			
04/05/2013	97,729.12	04/26/2013	742.50			
04/11/2013	957.00	04/30/2013	1,819.00			

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 126,941.00

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:
 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

- | | | |
|--------------|---|------------------------------------|
| CODE | C - Contributions (monetary, in-kind & transfers) | P - Postage, Mailing Permits |
| DEFINITIONS | I - Independent Expenditures | S - Surveys and Polls |
| ON NEXT PAGE | L - Literature, Brochures, Printing | F - Fundraising Event Expenses |
| | B - Broadcast Advertising (Radio, TV) | T - Travel, Accommodations, Meals |
| | N - Newspaper and Periodical Advertising | M - Management/Consulting Services |
| | O - Other Advertising (yard signs, buttons, etc.) | W - Wages, Salaries, Benefits |
| | V - Voter Signature Gathering | G - General Operation and Overhead |

3. EXPENDITURES
 a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
 b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
 c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	80.00
04/05/13	Greater Giving 1920 NW Amberglen Parkway Ste Beaverton, OR 97006		Credit Card Processing	3,694.64
04/01/13	Paypal 2211 N 1st St San Jose, CA 95131		Credit Card Processing	2,248.00
04/01/13	Yes on I-522 Committee 603 Stewart St Ste 819 Seattle, WA 98101		Contribution	180,000.00

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 0.00
 Enter also on line 11 of C4 \$ 186,022.64

CORRECTIONS

**SCHEDULE
TO C4**

C

**RECEIVED
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION**

4

Candidate or Committee Name (Do not abbreviate. Use full name.) Date
Organic Consumers Fund Committee to Label GMOs in WA State (Organic Consumers) 04/01/13 04/30/13
1. CONTRIBUTIONS AND RECEIPTS (Include mathematical corrections.)

Date of Report	Contributor's Name or Description of Correction	Amount Reported	Corrected Amount	Difference (+ or -)
04/01/13	Barbara Boyden 40 Lowden Ave 1 Somerville, MA 02144	20.00	0.00	-20.00
03/18/13	Sarah Renner 401 S 1st St Minneapolis, MN 55401	50.00	0.00	-50.00
Total corrections to contributions Enter on line 6 of C4. Show + or (-).				-70.00

CORRECTIONS

**SCHEDULE
TO C4**

C

**RECEIVED
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION**

5

Candidate or Committee Name (Do not abbreviate. Use full name.)

Date

Organic Consumers Fund Committee to Label GMOs in WA State (Organic Consumers) 04/08/13 04/30/13

2. EXPENDITURES (Include mathematical corrections.)

Date of Report	Vendor's Name or Description of Correction	Amount Reported	Corrected Amount	Difference (+ or -)
04/01/13	Barbara Boyden 40 Lowden Ave 1 Somerville, MA 02144	20.00	0.00	-20.00
03/18/13	Sarah Renner 401 S 1st St Minneapolis, MN 55401	50.00	0.00	-50.00
Total corrections to expenditures Enter on line 15 of C4. Show + or (-).				-70.00



**SUMMARY, FULL REPORT
RECEIPTS AND
EXPENDITURES**

C4
(3/97)

RECEIVED
06-28-2013
PUBLIC DISCLOSURE COMMISSION
100529494

Candidate or Committee Name (Do not abbreviate. Include full name) Organic Consumers Fund Committee to Label GMOs in WA State (Organic Consumers)			06-09-2013
Mailing Address 603 Stewart St Ste 819		City Seattle, WA	
Zip + 4 98101	Office Sought (Candidates)	Election Date 2013	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?
Report Period Covered 05/01/13	To (end of period) 05/31/13	Final Report? Yes No X	

RECEIPTS

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	303,733.62
2. Cash received (From line 2, Schedule A)	\$	118,000.00
3. In kind contributions received (From line 1, Schedule B)		0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		118,000.00
5. Loan principal repayments made (From line 2, Schedule L)		0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		421,733.62
9. Total pledge payments due (From line 2, Schedule B)		0.00

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		187,045.30
11. Total cash expenditures (From line 4, Schedule A)		201,329.32
12. In kind expenditures (goods & services) (From line 1, Schedule B)		0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		201,329.32
14. Loan principal repayments made (From line 2, Schedule L)		0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		388,374.62

CANDIDATES ONLY				CASH SUMMARY	
	Won	Lost	Unopposed	Name not on ballot	18. Cash on hand (Line 8 minus line 17)
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	33,359.00
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	[Line 18 should equal your bank account balance(s) plus your petty cash balance.]
Treasurer's Daytime Telephone No.: (206) 382-5552					19. Liabilities: (Sum of loans and debts owed)
					15,128.62
					20. Balance (Surplus or deficit) (Line 18 minus line 19)
					18,230.38

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature Organic Consumers Fund Committee to Label GMOs in WA	Date 06/09/13	Treasurer's Signature Philip Lloyd	Date 05/01/13
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CASH RECEIPTS AND EXPENDITURE

SCHEDULE **A**
 to C4
(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.) Organic Consumers Fund Committee to Label GMOs in WA State (Organic Report Date 2

05/01/13 05/31/13

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
05/01/2013	118,000.00					

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 118,000.00

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

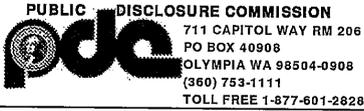
CODE DEFINITIONS ON NEXT PAGE	C - Contributions (monetary, in-kind & transfers) I - Independent Expenditures L - Literature, Brochures, Printing B - Broadcast Advertising (Radio, TV) N - Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.) V - Voter Signature Gathering	P - Postage, Mailing Permits S - Surveys and Polls F - Fundraising Event Expenses T - Travel, Accommodations, Meals M - Management/Consulting Services W - Wages, Salaries, Benefits G - General Operation and Overhead
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3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	0.00
05/05/13	Greater Giving 1920 NW Amberglen Parkway Ste Beaverton, OR 97006		Credit Card Processing	1,329.32
05/30/13	Yes on I-522 Committee 603 Stewart St Ste 819 Seattle, WA 98101		Contribution	200,000.00

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 0.00
 Enter also on line 11 of C4 \$ 201,329.32



**SUMMARY, FULL REPORT
RECEIPTS AND
EXPENDITURES**

C4
(3/97)

RECEIVED
OCT 23 2013
PUBLIC DISCLOSURE COMMISSION
100342703

Candidate or Committee Name (Do not abbreviate. Include full name) Organic Consumers Fund Committee to Label GMOs in WA State (Organic Consumers				09-10-2013
Mailing Address 603 Stewart St Ste 819			City Seattle, WA	
Zip + 4 98101	Office Sought (Candidates)		Election Date 2013	
Report Period Covered	From (last C-4) 08/01/13	To (end of period) 08/31/13	Final Report? Yes No X	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)

RECEIPTS

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	542,226.41
2. Cash received (From line 2, Schedule A)	\$	10,000.00
3. In kind contributions received (From line 1, Schedule B).....		3,165.00
4. Total cash and in kind contributions received this period (Line 2 plus 3).....		13,165.00
5. Loan principal repayments made (From line 2, Schedule L).....		0.00
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)		0.00
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)		0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		555,391.41
9. Total pledge payments due (From line 2, Schedule B).....		0.00

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		411,223.24
11. Total cash expenditures (From line 4, Schedule A)		100,000.00
12. In kind expenditures (goods & services) (From line 1, Schedule B)		3,165.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....		103,165.00
14. Loan principal repayments made (From line 2, Schedule L).....		0.00
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)		0.00
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)		0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....		514,388.24

CANDIDATES ONLY				CASH SUMMARY	
	Won	Lost	Unopposed	Name not on ballot	18. Cash on hand (Line 8 minus line 17).....
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	41,003.17
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	[Line 18 should equal your bank account balance(s) plus your petty cash balance.]
Treasurer's Daytime Telephone No.: (218) 220-0950					19. Liabilities: (Sum of loans and debts owed)
					551.25
					20. Balance (Surplus or deficit) (Line 18 minus line 19)
					40,451.92

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature Organic Consumers Fund Committee to Label GMOs in WA	Date 09/10/13	Treasurer's Signature Rose Welch	Date 08/31/13
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CASH RECEIPTS AND EXPENDITURE

SCHEDULE **A**
to C4
(11/83)

RECEIVED
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION

Candidate or Committee Name (Do not abbreviate. Use full name.) Report Date 2

Organic Consumers Fund Committee to Label GMOs in WA State (Organic 08/01/13 08/31/13

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
08/22/2013	10,000.00					

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 10,000.00

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE
DEFINITIONS
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	0.00
08/06/13	Yes on I-522 Committee 603 Stewart St Ste 819 Seattle, WA 98101		Contribution	100,000.00

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 0.00
Enter also on line 11 of C4 \$ 100,000.00

RECEIVED
~~OCT 28 2013~~

PUBLIC DISCLOSURE COMMISSION

3

**IN KIND CONTRIBUTIONS, PLEDGES,
 ORDERS, DEBTS, OBLIGATIONS**

**SCHEDULE
 TO C4**

B

(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

Organic Consumers Fund Committee to Label GMOs in WA State (Organic Consumers Fund) 08/01/13 08/31/13

1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
08/29/13	Organic Consumers Association 6771 S Silver Hill Dr Finland, MN 55603	Staff Services	3,165.00	151,632.87			
TOTAL THIS PAGE			3,165.00				

**IN KIND CONTRIBUTIONS, PLEDGES,
ORDERS, DEBTS, OBLIGATIONS**

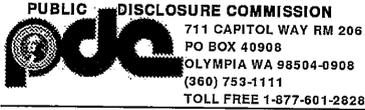
**SCHEDULE
TO C4** **B**
(11/93)

**RECEIVED
OCT 28 2013**
PUBLIC DISCLOSURE COMMISSION
4

Candidate or Committee Name (Do not abbreviate. Use full name.) Report Date
 Organic Consumers Fund Committee to Label GMOs in WA State (Organic Consumers Fund) 08/01/13 08/31/13

3. ORDERS PLACED, DEBTS, OBLIGATIONS. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)

Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code OR	Description of Obligation
08/31/2013	Project Accounting Services 603 Stewart St Ste 819 Seattle, WA 98101	551.25		Compliance
TOTAL THIS PAGE		551.25		



**SUMMARY, FULL REPORT
 RECEIPTS AND
 EXPENDITURES**

C4
 (3/97)

RECEIVED
OCT 28 2013
 PUBLIC DISCLOSURE COMMISSION
 100548419

Candidate or Committee Name (Do not abbreviate. Include full name) Organic Consumers Fund Committee to Label GMOs in WA State (Organic Consumers			10-15-2013
Mailing Address 603 Stewart St Ste 819		City Seattle, WA	
Zip + 4 98101	Office Sought (Candidates)	Election Date 2013	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)?
Report Period Covered From (last C-4) 09/01/13	To (end of period) 10/14/13	Final Report? Yes No X	

RECEIPTS

	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)			\$ 555,391.41
2. Cash received (From line 2, Schedule A)	\$ 100,921.52		
3. In kind contributions received (From line 1, Schedule B).....	5,000.00		
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			105,921.52
5. Loan principal repayments made (From line 2, Schedule L).....	0.00		
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)	0.00		
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)			661,312.93
9. Total pledge payments due (From line 2, Schedule B)	0.00		

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)			514,388.24
11. Total cash expenditures (From line 4, Schedule A)	100,551.25		
12. In kind expenditures (goods & services) (From line 1, Schedule B)	5,000.00		
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....			105,551.25
14. Loan principal repayments made (From line 2, Schedule L).....	0.00		
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	0.00		
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)			0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....			619,939.49

CANDIDATES ONLY				CASH SUMMARY	
	Won	Lost	Unopposed	Name not on ballot	
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Cash on hand (Line 8 minus line 17).....
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	[Line 18 should equal your bank account balance(s) plus your petty cash balance.]
Treasurer's Daytime Telephone No.:					19. Liabilities: (Sum of loans and debts owed)
(218) 220-0950					20. Balance (Surplus or deficit) (Line 18 minus line 19)
					41,373.44

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
Organic Consumers Fund Committee to Label GMOs in WA	10/15/13	Rose Welch	10/14/13

CASH RECEIPTS AND EXPENDITURE

SCHEDULE A
to C4
(11/93)

RECEIVED
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION

Candidate or Committee Name (Do not abbreviate. Use full name.) Organic Consumers Fund Committee to Label GMOs in WA State (Organic Report Date 09/01/13 10/14/13

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
09/13/2013	410.00	09/29/2013	5,431.00			
09/16/2013	25,384.92	10/06/2013	45,980.47			
09/22/2013	8,742.00	10/13/2013	14,973.13			

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 100,921.52

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

- | | | |
|--------------------------------------|--|--|
| <p>CODE DEFINITIONS ON NEXT PAGE</p> | <p>C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering</p> | <p>P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead</p> |
|--------------------------------------|--|--|

3. EXPENDITURES

- Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	0.00
09/01/13	Project Accounting Services 603 Stewart St Ste 819 Seattle, WA 98101		Compliance	551.25
09/19/13	Yes on I-522 Committee 603 Stewart St Ste 819 Seattle, WA 98101		Contribution	100,000.00

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 0.00
Enter also on line 11 of C4 \$ 100,551.25

RECEIVED

~~OCT 28 2013~~

PUBLIC DISCLOSURE COMMISSION

3

**IN KIND CONTRIBUTIONS, PLEDGES,
ORDERS, DEBTS, OBLIGATIONS**

**SCHEDULE
TO C4**

B

(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

Organic Consumers Fund Committee to Label GMOs in WA State (Organic Consumers Fund) 10/14/13 10/14/13

1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
10/14/13	Organic Consumers Association 6771 S Silver Hill Dr Finland, MN 55603	Staff Services	5,000.00	156,632.87			
TOTAL THIS PAGE			5,000.00				



CASH RECEIPTS MONETARY CONTRIBUTIONS

C3
(1/02)

RECEIVED
THIS OFFICE OFFICE
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION
100321980

05-08-2013

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Yes on I-522 Committee (Yes on I-522 Committee)
 Mailing Address
 603 Stewart St Ste 819
 City Zip + 4 Office Sought (candidates) Election Date
 Seattle, WA 98101 2013

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

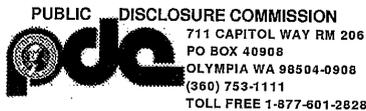
Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I N	G E N	Amount	Aggregate* Total
04/01/13	Amy's Kitchen Inc PO Box 449 Petaluma, CA 94953				12,500.00	12,500.00
	Occupation					
04/01/13	Organic Consumer Fund 603 Stewart St Ste 819 Seattle, WA 98101				180,000.00	180,000.00
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached					
		Sub-total			192,500.00	
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

192,500.00

*See reverse for details.

4. Date of Deposit: 04/01/13
 Treasurer's Daytime Telephone No.: (206) 382-5552
 I certify that this report is true and complete to the best of my knowledge
 Treasurer's Signature: Philip Lloyd
 Date: 05-08-2013



**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

RECEIVED
 THIS CHECK FOR OFFICE USE
OCT 28 2013
 PUBLIC DISCLOSURE COMMISSION
 100529820

06-10-2013

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Yes on I-522 Committee (Yes on I-522 Committee)

Mailing Address
 603 Stewart St Ste 819

City Zip + 4 Office Sought (candidates) Election Date
 Seattle, WA 98101 2013

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
05/29/13	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation	71.00	
05/29/13	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	50.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I N T	G R A N T	Amount	Aggregate* Total
05/24/13	Clif Bar & Company 1451 66th St Emeryville, CA 94608				25,000.00	25,000.00
	Occupation					
05/30/13	Organic Consumer Fund 603 Stewart St Ste 819 Seattle, WA 98101				200,000.00	380,000.00
	Occupation					
05/21/13	Organic Foods Express, Inc 5566 Randolph Rd Rockville, MD 20852				5,000.00	5,000.00
	Occupation					
05/30/13	Presence Marketing, Inc 12 Executive Ct Barrington, IL 60010				100,000.00	200,000.00
	Occupation					
05/30/13	William T. Weiland 921 N Plum Grove Rd Schaumburg, IL 60173-4761	Presence Marketing Inc			25,000.00	50,000.00
	Occupation Owner					
	<input type="checkbox"/> Check here if additional pages are attached					
		Sub-total			355,121.00	
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

355,121.00

***See reverse
 for details.**

4. Date of Deposit
 05/31/13

Treasurer's Daytime Telephone No.: (206) 382-5552

I certify that this report is true and complete to the best of my knowledge
 Treasurer's Signature Date
 Philip Lloyd 06-10-2013

**Statement of Miscellaneous Receipts
Attachment to Form C3**

RECEIVED
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION
Page 2

Candidate or Committee Name
Yes on I-522 Committee (Yes on I-522 Committee) Deposit Date

Date Received	Payee's Name, Address, City, State, Zip	Description	Amount
05/29/13	Low Cost Fundraiser 603 Stewart St Ste 819 Seattle, WA 98101	Merchandise Sales	71.00

Subtotal this page 71.00



**CASH RECEIPTS
MONETARY
CONTRIBUTIONS**

C3
(1/02)

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THIS RECEIPT FOR OFFICE OF
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION
100540066

08-19-2013

Candidate or Committee Name (Do not abbreviate. Use full name.)
Yes on I-522 Committee (Yes on I-522 Committee)

Mailing Address
603 Stewart St Ste 819

City Zip + 4 Office Sought (candidates) Election Date
Seattle, WA 98101 2013

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
08/07/13	a. Anonymous	10.00	726.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L.....		
08/08/13	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation	12.00	
08/06/13	e. Small contributions \$25.00 or less not itemized and number of persons giving 125 (persons)	2,195.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100.* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
08/07/13	Michaelene Adams 3933 149th Pl SW Lynnwood, WA 98087				50.00	50.00
	Occupation					
08/09/13	Kathleen Archer 9106 Olympic View Dr Edmonds, WA 98026				100.00	100.00
	Occupation					
08/06/13	Alisa Armstron 3043 NW 59th St Seattle, WA 98107				50.00	50.00
	Occupation					
08/06/13	William Austin 1578 NE Iris St Issaquah, WA 98029				50.00	50.00
	Occupation					
08/07/13	Mary Bellflower 4005 SW Henderson St Seattle, WA 98136				50.00	50.00
	Occupation					
	<input checked="" type="checkbox"/> Check here if additional pages are attached					
		Sub-total			2,517.00	
		Amount from attached pages			106,362.20	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

108,879.20

***See reverse
for details.**

4. Date of Deposit

08/12/13

Treasurer's Daytime Telephone No.: (206) 382-5552

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Philip Lloyd

08-19-2013

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

RECEIVED
OCT 28 2013
 Page 2 DISCLOSURE COMMISSION

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Yes on I-522 Committee (Yes on I-522 Committee) Deposit Date
 08/12/13

2. CONTRIBUTIONS OVER \$25.00						
Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P	R	G	Aggregate Total*
			I		E	Amount
08/06/13	Janet M. Bevan 7708 149th Ave NE Redmond, WA 98052	, Occupation				50.00 50.00
08/07/13	Cathy Bond 20160 N Bernhill Rd Colbert, WA 99005	, Occupation				50.00 50.00
08/09/13	Anita Boser 57404 SE 154th Pl Issaquah, WA 98027	, Occupation				50.00 50.00
08/06/13	Margot F. Boyer PO Box 746 Vashon, WA 98070	Self Vashon, WA Occupation <u>Writer</u>				100.00 200.00
08/06/13	Shane A. Brusewitz PO Box 296 Canranation, WA 98014	, Occupation				50.00 50.00
08/06/13	Frederick D. Campbell 3822 Ashworth Ave N #B Seattle, WA 98103	, Occupation				50.00 50.00
08/08/13	Cathy Casteel 105 W Highland Dr Seattle, WA 98119	, Occupation				100.00 100.00
08/06/13	Diane L. Davison 8214 41st Ave NE Seattle, WA 98115	, Occupation				50.00 50.00
08/07/13	Marianne Delisle PO Box 664 Edmonds, WA 98020	, Occupation				100.00 100.00
08/06/13	Kevin R. Dix 8633 138th Ave SE Newcastle, WA 98059	, Occupation				50.00 50.00
08/07/13	Sandra Emerson 820 NE 8th St North Bend, WA 98045	, Occupation				50.00 50.00

Page Total 700.00

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**RECEIVED
OCT 28 2013**

Page 2 DISCLOSURE COMMISSION

Candidate or Committee Name (Do not abbreviate. Use full name.) Yes on I-522 Committee (Yes on I-522 Committee)	Deposit Date 08/12/13
--	--------------------------

2. CONTRIBUTIONS OVER \$25.00						
Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
08/08/13	Anne Engstrom 143 N 82nd St Seattle, WA 98103	, Occupation			50.00	50.00
08/06/13	Melinda K. Ferguson 8711 228th St SW Edmonds, WA 98026	, Occupation			50.00	50.00
08/06/13	Erin C. Fields 11635 101st Pl NE Kirkland, WA 98034	, Occupation			50.00	50.00
08/06/13	Pamela E. Frenz 2114 Arch Pl SW #A Seattle, WA 98116	, Occupation			50.00	50.00
08/07/13	Karen Giovi PO Box 1804 Issaquah, WA 98027	, Occupation			50.00	50.00
08/09/13	James Hanford 5527 17th Ave NE Seattle, WA 98105	, Occupation			50.00	50.00
08/06/13	Blanca E. Harnandez 2315A 10th Ave E Seattle, WA 98102	, Occupation			50.00	50.00
08/07/13	Janis Hauser 13220 68th Pl NE Kirkland, WA 98034	, Occupation			50.00	50.00
08/07/13	Carol Sue Ivory-Carline 7523 31st Ave NE Seattle, WA 98115	, Occupation			100.00	100.00
08/07/13	Merri Lee Jacobs 543 Main St #105 Edmonds, WA 98020	, Occupation			50.00	50.00
08/09/13	Tea Kautto 22931 SE 13th Pl Sammamish, WA 98075	, Occupation			100.00	100.00

Page Total 650.00

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OCT 28 2013
 PUBLIC DISCLOSURE COMMISSION

Candidate or Committee Name (Do not abbreviate. Use full name.) Yes on I-522 Committee (Yes on I-522 Committee)	Deposit Date 08/12/13
--	--------------------------

2. CONTRIBUTIONS OVER \$25.00						
Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P	R	G	Aggregate Total*
			I		E	Amount
08/07/13	Roxanne Kenison 7545 Earl Ave NW Seattle, WA 98117	, Occupation				50.00 50.00
08/08/13	Jee S. Kim 6743 16th Ave NW Seattle, WA 98117	, Occupation				52.20 52.20
08/08/13	Robyn Klarman 19815 88th Ave W Edmonds, WA 98026	, Occupation				50.00 50.00
08/07/13	Ann Lanning 2416 169th Pl SE Bellevue, WA 98008	, Occupation				50.00 50.00
08/06/13	Lois M. Lashell 805 Dayton St Edmonds, WA 98020	, Occupation				50.00 50.00
08/06/13	Nanette Leaman 1462 Arnold Rd Oak Harbor, WA 98277	, Occupation				50.00 50.00
08/06/13	Jeanne M. Macauley 1578 NE Iris St Issaquah, WA 98029	, Occupation				50.00 50.00
08/07/13	Jeff Matsushita 6578 102nd Ave NE Kirkland, WA 98033	, Occupation				50.00 50.00
08/06/13	Linda I. Maurer PO Box 331 Hobart, WA 98025	None Hobart, WA Occupation Retired				200.00 200.00
08/07/13	Carol McKean 11017 Alton Ave NE Seattle, WA 98125	, Occupation				50.00 50.00
08/07/13	Albert Menzl 4742 42nd Ave SW #130 Seattle, WA 98116	, Occupation				50.00 50.00

Page Total 702.20

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OCT 28 2013
 PUBLIC DISCLOSURE COMMISSION

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Yes on I-522 Committee (Yes on I-522 Committee) Deposit Date
 08/12/13

2. CONTRIBUTIONS OVER \$25.00						
Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
08/08/13	Jane Meston 3415 207th Ave SE Sammamish, WA 98075	, Occupation			50.00	50.00
08/06/13	Claire M. Murphy 23510 93rd Ave W Edmonds, WA 98020	, Occupation			50.00	50.00
08/06/13	John A. Murphy 23510 93rd Ave W Edmonds, WA 98020	, Occupation			50.00	50.00
08/06/13	Scott Nonnenberg 1310 N Lucas Pl Unit 302 Seattle, WA 98103	, Occupation			50.00	50.00
08/09/13	Diane Nordfors 28706 97th Ave SW Vashon, WA 98070	, Occupation			50.00	50.00
08/06/13	James J. O'Neill 141 E Lk Sam Shr Ln NE Sammamish, WA 98074	, Occupation			50.00	50.00
08/06/13	Mary M. O'Neill 141 E Lk Sam Shr Ln NE Sammamish, WA 98074	, Occupation			50.00	50.00
08/12/13	Organic Consumer Fund Committee 603 Stewart St Ste 819 Seattle, WA 98101	, Occupation			100,000.00	480,750.00
08/06/13	Bonnie Peltola 1106 206th Pl NE Sammamish, WA 98074	, Occupation			50.00	50.00
08/08/13	Julie Pohl 2412 NW 62nd St #1 Seattle, WA 98107	, Occupation			100.00	100.00
08/07/13	William Porter PO Box 1407 Milton, WA 98354	, Occupation			50.00	50.00

Page Total 100,550.00

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OCT 28 2013
 PUBLIC DISCLOSURE COMMISSION

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Yes on I-522 Committee (Yes on I-522 Committee) Deposit Date
 08/12/13

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
08/06/13	Rachel I. Price 7323 25th Ave NE Seattle, WA 98117	, Occupation			50.00	50.00
08/07/13	Christina Raye 2119 SE 21st Ct Renton, WA 98055	, Occupation			100.00	100.00
08/07/13	Ana Rivero 5809 149th Ave SE Bellevue, WA 98006	, Occupation			50.00	50.00
08/07/13	David Roche 1685 14th Ave NE Issaquah, WA 98029	, Occupation			50.00	50.00
08/08/13	Karlla Sander 2035 NW Blue Ridge Dr Seattle, WA 98177	Self Seattle, WA Occupation Accountant			250.00	250.00
08/06/13	Tamiko Santon 6300 Sand Point Way NE Apt 211 Seattle, WA 98115	, Occupation			50.00	50.00
08/06/13	Melodie H. Schneider 6327 Wilson Ave S Seattle, WA 98118	, Occupation			100.00	100.00
08/07/13	Amanda Strombom 19215 SE 46th St Issaquah, WA 98027	, Occupation			50.00	50.00
08/06/13	Lee Sturdivant 745A Larson St Friday Harbor, WA 98250	, Occupation			35.00	35.00
08/08/13	The Natural Grocery Co. 10367 San Pablo Ave El Cerrito, CA 94530	, Occupation			2,500.00	2,500.00
08/07/13	Mary Tudor 4810 S Angeline St Seattle, WA 98118	, Occupation			50.00	50.00

Page Total 3,285.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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OCT 28 2013
Page 68 DISCLOSURE COMMISSION

Candidate or Committee Name (Do not abbreviate. Use full name.) Yes on I-522 Committee (Yes on I-522 Committee)	Deposit Date 08/12/13
--	--------------------------

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P	R	I	G	E	N	Amount	Aggregate Total*
08/08/13	K.S. Visonhaler 22420 77th Ave W Edmonds, WA 98026	, Occupation							50.00	50.00
08/06/13	Edith M. Walden 6203 S Shore Rd Anacortes, WA 98221	, Occupation							50.00	50.00
08/08/13	Wayne Seminoff Company PO Box 956 Kirkland, WA 98083	, Occupation							50.00	50.00
08/07/13	Tammi J. Weigel 3014 S 320th Federal Way, WA 98003	, Occupation							50.00	50.00
08/07/13	Jennifer Williams 13129 SW 248th St Vashon, WA 98070	, Occupation							50.00	50.00
08/09/13	Jeffrey Wilson 16480 NE 46th St Redmond, WA 98052	, Occupation							62.50	62.50
08/06/13	Martha E. Wilson 20431 Little Bear Creek Rd Woodinville, WA 98072	, Occupation							50.00	50.00
08/09/13	Tracy Wilson 16480 NE 46th St Redmond, WA 98052	, Occupation							62.50	62.50
08/07/13	Len Wyatt 5809 149th Ave SE Bellevue, WA 98006	, Occupation							50.00	50.00
		, Occupation								
		, Occupation								

Page Total 475.00

**Statement of Miscellaneous Receipts
Attachment to Form C3**

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OCT 28 2013
PUBLIC DISCLOSURE COMMISSION
Page 8

Candidate or Committee Name _____ Deposit Date _____
Yes on I-522 Committee (Yes on I-522 Committee)

Date Received	Payee's Name, Address, City, State, Zip	Description	Amount
08/08/13	Low Cost Fundraiser 603 Stewart St Ste 819 Seattle, WA 98101	Merchandise Sales	12.00

Subtotal this page 12.00



**CASH RECEIPTS
MONETARY
CONTRIBUTIONS**

C3
(1/02)

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OCT 28 2013
PUBLIC DISCLOSURE COMMISSION
100341500

09-23-2013

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Yes on I-522 Committee (Yes on I-522 Committee)
 Mailing Address
 603 Stewart St Ste 819
 City Zip + 4 Office Sought (candidates) Election Date
 Seattle, WA 98101 2013

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
09/19/13	Organic Consumer Fund 603 Stewart St Ste 819 Seattle, WA 98101				100,000.00	580,750.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			100,000.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

4. Date of Deposit: 09/19/13
 Treasurer's Daytime Telephone No.: (206) 382-5552
 I certify that this report is true and complete to the best of my knowledge
 Treasurer's Signature: Philip Lloyd Date: 09-23-2013

From: ronniecummings=organicconsumers.org@mail.salsalabs.net
[mailto:ronniecummings=organicconsumers.org@mail.salsalabs.net] **On Behalf Of** Organic Consumers Association
Sent: Tuesday, October 15, 2013 6:19 AM
To: info@nwdailymarker.com
Subject: Don't let Monsanto take this one away.

Is this email not displaying correctly?
[View it in your browser.](#)



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Don't let Monsanto take this one away.



Dear Organic Consumer,

Last year this time, you were pouring your heart and soul into winning the GMO labeling battle in California. So was I. With three weeks to go before the election, victory was so

close we could almost taste it.
Then Monsanto snatched it away.

Please make a generous donation today to help us win this year's key GMO labeling battle in Washington State. Every donation you make here will go directly to the YES on I-522 campaign.

Twelve months later, here we are again. The battleground has shifted to Washington State. The campaign is called I-522, not Proposition 37.

But we're facing the same enemy. With the same deep pockets. The same arrogant, fear-mongering campaign of lies and half-truths. The same desperate determination to protect their obscene profits by keeping honest labels off of the GMO ingredients they put in your food.

We are ahead in the polls in Washington State. But not as far ahead as we were before Monsanto and the Junk Food Giants started blanketing the airwaves with their lies.

We need to run more ads. To reach more voters. And we need your help.

Please make a generous donation today to help us win this year's key GMO labeling battle in Washington State. Every donation you make here will go directly to the YES on I-522 campaign.

Tomorrow, the ballots will be mailed. Friday, the voting will begin. On midnight, Nov. 5 it will be over.

Once again, victory is so close we can taste it.

But our experts in Washington State are clear: I-522 is not in the bag. Yet.

This has always been a David versus Goliath battle. It has been us – you, me, millions of moms and dads of every political persuasion – against shameless, soulless corporations.

We need to win this one. And we need your help to do it.

Thank you! And thank you for being the heart and soul of this movement,



Ronnie Cummins

National Director, Organic Consumers Association and Organic Consumers Fund

P.S. Contributions to the Organic Consumers Fund, our 501c4 allied lobbying arm, are not tax-deductible. If you want to support our work on GMO labeling, but need your donation to be tax-deductible, please donate here to the Organic Consumers Association. Thank you!

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print it, duplicate it and post it freely. Knowledge is power!

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Exhibit F

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ORGANIC CONSUMERS ASSOCIATION

MILLIONS AGAINST MONSANTO

Home Take Action Materials Links World Food Day Yes on 522 Donate



Search

GET LOCAL!

Find News, Events, and Green Businesses:

Choose Your State

- Submit News
- Submit Organizations
- Submit Green Businesses
- Submit Events

Campaign Links

- [Take Action: We Want GMOs & Factory Farm Products Labeled!](#)
- [Please Donate to Support this Campaign!](#)
- [Avoid GMOs with the Non-GMO Shopping Guide](#)
- [Educate Yourself! Movies to Inspire You to Boycott GMOs](#)
- [Learn More by Visiting OCA's Resource Page on Genetic Engineering](#)
- [Source Watch on Monsanto](#)
- [Diagram of Monsanto's Consolidation in the Seed Industry](#)
- [How pressure from Monsanto led Fox TV to fire two of its award-winning reporters](#)
- [Spanish version of The Ecologist's special issue on Monsanto](#)
- [Activist music opposing Monsanto](#)
- [Health and environmental effects of Monsanto's Roundup pesticide](#)
- [Monsanto Fails to Identify GE Risks to Its Investors \(pdf\)](#)

Organizations

- [Naturalnews.com](#)
- [Institute for Responsible Technology](#)
- [Center for food safety](#)
- [Cornucopia Institute](#)
- [Food and water watch](#)
- [Source watch](#)
- [Global Justice Ecology Project](#)
- [Food democracy Now](#)
- [GRAIN](#)
- [IFOAM](#)
- [Michael Pollan's Website](#)
- [Tom Philpott's Archive on Grist](#)
- [Friends of the Earth](#)
- [GM Watch \(EU\)](#)
- [Institute of Science in Society](#)
- [Etcgroup.org](#)
- [Greenpeace International](#)
- [Sierra club](#)



PLEASE DONATE

Donate Online

Write *Monsanto Sticker* in the comments field to receive a Millions Against Monsanto bumper sticker.



Get a Millions Against Monsanto tee shirt



Millions Against Monsanto

A Project of Organic Consumers Association

6771 SOUTH SILVER HILL DRIVE, FINLAND MN 55603
CONTACT US · FAX: 218-353-7652

SEND A TAX-DEDUCTIBLE DONATION TO THE OCA

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Sign up for *Organic Bytes*, the Weekly Newsletter of the Organic Consumers Association

email:

zip / postal code: (optional)

Sign Up

Exhibit G

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OCT 28 2013
PUBLIC DISCLOSURE COMMISSION
Campaigning for Health,
Justice, Sustainability,
Peace, and Democracy

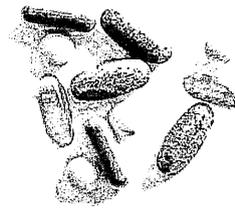


Tweet < 102
Recommend 715 Send

Tell Dr. Weil: Get the GMOs out of Supplements and Support GMO Labeling in Washington State!

It's a medical mystery.

Healthy lifestyle guru Dr. Andrew Weil says genetically modified organisms (GMOs) cause "ranges of health problems" in animals. He favors GMO labeling laws, he says, because consumers should have the right to know if products contain GMOs.



Yet the good doctor's company, Weil Lifestyle LLC, is a member of the Grocery Manufacturers Association (GMA) – the top donor so far to the campaign to defeat a GMO labeling initiative in Washington State, and a major contributor (\$2 million) to the campaign that last year defeated Proposition 37, a similar GMO labeling initiative in California.

Not only that, but Weil Lifestyle knowingly sells supplements that contain GMOs. Unlabeled.

Please send a letter with the form below. Tell Dr. Weil and Weil Lifestyle LLC: Get the GMOs out of Supplements and Support GMO Labeling in Washington State!

In this 2011 video Dr. Weil says it's "hard to foresee all of the downstream consequences" of genetically engineering our food. Genetic engineering "might cause allergies, we don't know."

And in this blog post, the doctor says that the arguments for and against labeling are "pretty obvious."

"Those in favor of labeling (myself included) believe that consumers have a right to know when foods are modified with genes from another species."

Yet when we called the Weil Lifestyle consumer product line to ask if the company sold supplements containing genetically modified soy (soy lecithin), the customer service representative said that their supplements containing soy lecithin are "not certified GMO-free." (There are two exceptions: CO Q10 and Vitamin E, which contain non-GMO soy lecithin, the company said).

So why not label supplements containing GMOs? According to an email from a member of the company's Vitamin Advisor Team: "Unfortunately non-organic foods and even foods labeled GMO-free cannot be guaranteed 100% free of genetically engineered ingredients. This is primarily due to cross-pollination or cross contamination."

So. To summarize. Dr. Weil believes GMOs may be bad for our health, and that products containing GMOs should be labeled. But not products sold by Weil Lifestyle? Because why bother labeling as long as there's a possibility that non-GMO crops might be contaminated?

Barely two weeks after California's Proposition 37 was defeated by a razor-thin margin, thanks to a \$46-million campaign of lies and misinformation, Dr. Weil chastised fans gathered one of his book-signings in San Francisco for failing to pass the initiative. According to blogger Eric Riess, Weil said, "How could you let that fail?"

Fans should have asked him: "How can you belong to a trade group that spent \$2 million to defeat Prop 37?"

It's time for Dr. Weil to stop preaching one thing, while he practices another.

Please send your letter today. Tell Dr. Weil and Weil Lifestyle LLC: Get the GMOs out of Supplements and Support GMO Labeling in Washington State!

Subject:
Please contribute to the Yes on 522 campaign to label GMOs in Washington Sta

Your Letter:

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Dear Dr. Weil,
 Last year you asked a group of your fans in San Francisco how they could have let Proposition 37, California's GMO labeling initiative, fail. And yet, as a dues-paying member of the Grocery Manufacturers Association (GMA), your company, Weil Lifestyle, helped contribute \$2 million to defeat Prop 37. And now, with the GMA as the top donor to the campaign to defeat I-522, a GMO labeling initiative in Washington State, Weil Lifestyle is once again working to defeat consumers' right to know.

As a responsible consumer, I am calling on your company to either eliminate GMOs from your supplements, or label them. After all, you have spoken out publicly about the health hazards of GMOs and you've said that you favor GMO labeling laws. If that's true, now is the time to show your support for consumers. I am calling on you today to protest the GMA's financial support of anti-labeling campaigns by withdrawing from the trade group, and to show

First Name*

Last Name*

Email*

Phone

Street

City

State/Province

Zip/Postal Code*

Additional background

Here are a few more interesting facts about Dr. Weil, taken from this article in the Health Wyze Report.

Dr. Weil was an early proponent of using canola oil for cooking. Canola was developed from the rapeseed plant, using traditional plant breeding techniques to rid the rapeseed of erucic acid and glucosinates. According to the International Service for the Acquisition of Biotech Applications, 97.5 percent of the canola grown today in Canada (where most of North America's canola is grown) is genetically engineered. Weil has referred to canola oil as the "healthiest" cooking oil. It was Dr. Joseph Mercola, according to Health Wyze, who pointed out that once canola oil is heated, it releases 1,3Butadiene, benzene, acrolein, formaldehyde, and other related poisonous compounds which become infused into the foods being cooked. Mercola reported that:

"During processing, the omega-3 fatty acids of canola oil are transformed into dangerous trans fatty acids; similar to those found in margarine, and possibly even more dangerous. A recent study indicates that 'heart healthy' canola oil actually produces a deficiency of vitamin E, a vitamin required for a healthy cardiovascular system. Other studies indicate that even lower erucic acid canola oil causes heart lesions, particularly when the diet is low in saturated fats."

Given Dr. Weil's early endorsement of genetically modified canola oil, and his company's continued practice of selling supplements containing GMOs, without labeling them, we have to ask: Has Dr. Weil only recently spoken out against GMOs and for GMO labeling, because he knows that more than 90 percent of consumers want GMOs labeled?

More to the point: When will Dr. Weil resign from the GMA, stop selling supplements containing GMOs, and start supporting – financially – I-522, the Washington State ballot initiative to label GMOs?

Dr. Weil publicly practices alternative medicine in a manner that ultimately discredits it. He has been placed in an excellent position to do this by the long-standing enemies of alternative medicine - mainstream media and publishing houses - whose funding from the pharmaceutical industry exceeds that from all other sponsors combined.

Dr. Weil and his foundation have partnered with drugstore.com. Drugstore.com paid in excess of \$3.9 million in monthly sales commissions, donations and quarterly royalties, before the relationship soured and drugstore.com sued Weil. In addition, Drugstore.com also pays a monthly honorarium directly to Weil.

Source: Health Wyze Report

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Please support our work: Send a tax-deductible donation to the OCA

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Exhibit H

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Search OCA:

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Find Local News, Events & Green Businesses on OCA's State Pages:

Choose Your State

OCA Canada Page

OCA en español

OCA News Sections

Organics

- Organic Transitions
- Save Organic Standards
- Bodycare
- Clothes
- Biodynamics
- The Myth of Natural

Planting Peace

Agriculture and Climate

Health Issues

- Swine & Bird Flu
- Vitamins & Supplements
- Children's Health

Genetic Engineering

- rBGH
- Millions Against Monsanto
- Cloning & Patenting
- Nanotechnology
- GM Wheat
- Fish

Food Safety

- USDA Watch
- Toxic Sludge
- Raw Milk
- Mad Cow
- Irradiation
- Perchlorate

Fair Trade/ Social Justice

- Buy Local Movement

Farm Issues

- NAIS
- Honey Bees

Politics & Democracy

About the OCA: Who We Are and What We're Doing

Organic Consumers Association (OCA)

The Organic Consumers Association (OCA) is an online and grassroots non-profit 501(c)3 public interest organization campaigning for health, justice, and sustainability. The OCA deals with crucial issues of food safety, industrial agriculture, genetic engineering, children's health, corporate accountability, Fair Trade, environmental sustainability and other key topics. We are the only organization in the US focused exclusively on promoting the views and interests of the nation's estimated 50 million organic and socially responsible consumers.



The OCA represents over 850,000 members, subscribers and volunteers, including several thousand businesses in the natural foods and organic marketplace. Our US and international policy board is broadly representative of the organic, family farm, environmental, and public interest community.

The Organic Consumers Association was formed in 1998 in the wake of the mass backlash by organic consumers against the U.S. Department of Agriculture's controversial proposed national regulations for organic food. Through the OCA's **SOS (Safeguard Organic Standards) Campaign**, as well as the work of our allies in other organizations, the organic community over the last eight years has been able to mobilize hundreds of thousands of consumers to pressure the USDA and organic companies to preserve strict organic standards. In its public education, network building, and mobilization activities such as its **Breaking the Chains campaign**, OCA works with a broad range of public interest organizations to challenge industrial agriculture, corporate globalization, and the Wal-Martization of the economy, and inspire consumers to "Buy Local, Organic, and Fair Made."

OCA's overall political program is the Organic Agenda 2005-15, a six-point platform calling for:

- o The conversion of American agriculture to at least 30% organic by the year 2015, including major reforms in agricultural subsidies and appropriations to help family farmers make the transition to organic, develop local and regional markets, and adopt renewable energy practices.
- o Fair Trade and economic justice, not so-called corporate-driven "Free Trade" as the global norm.
- o A global moratorium on genetically engineered foods and crops.
- o A phase-out of the most dangerous industrial agriculture and factory farming practices.

Menu

- Send an Email to OCA
- Privacy Policy
- National Grassroots Network

OCA Policy and Advisory Board:

Ronnie Cummins

OCA National Director

Will Allen

Vermont Organic Farmer

Maude Barlow

Council of Canadians (Canada)

Jay Feldman

National Coalition Against the Misuse of Pesticides (DC)

Jim and Rebecca Goodman

Wisconsin Organic Farmers

Jean Halloran

Consumers Union (NY)

Tim Hermach

Native Forest Council (OR)

Julia Butterfly Hill

Author & Forest Activist (CA)

Annie Hoy

Ashland Community Food Store (Oregon)

Mika Iba

Network for Safe & Secure Food & Environment (Japan)

Pat Kerrigan

Emergency Food Shelf Network (MN)

John Kinsman

Family Farm Defenders (WI)

Frances Moore Lappe

Author - Small Planet Institute

Howard Lyman

EarthSave (VA)

Judith McGeary

Farm and Ranch Freedom Alliance (TX)

Jill Richardson

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Publications <ul style="list-style-type: none"> • Organic Bytes • Organic View
Resources <ul style="list-style-type: none"> • OCA Sponsors • Buying Guide • OCA Action Center • OCA Press Center • OCA En Español
Intern with OCA!

- o Universal health care with an emphasis on prevention, nutrition, and wellness promotion.
- o Energy independence and the conversion of US and global agriculture, transportation, and utilities to conservation practices and renewable energy.

Robyn Seydel
 La Montanita Co-op (NM)

Vandana Shiva
 Research Foundation for Science, Technology, & Natural Resource Policy (India)

Financial Documents

- OCA Financial Report 2011
- OCA 2011 Form 990

Our website, publications, research, and campaign staff provide an important service for hundreds of thousands of consumers and community activists every month. Our media team provides background information, interviews, and story ideas to television and radio producers and journalists on a daily basis - from national television networks to the alternative press.

Privacy Policy:

In Summary:

The Organic Consumers Association does not sell, lease, give-away, disclose or otherwise release your email or other information to other organizations or individuals. Our practice is to send very minimal email, normally 2-3 per month.

In Detail:

The Organic Consumers Association is a non-profit, grassroots organization and receives contact information through various means, such as, online volunteer signup, donations, newsletter subscriptions, and other outreach. This contact information is used by our "individual coordinators" and "coalition partners" (NGO's/ organizations) around the United States and world to achieve our mission:

The Organic Consumers Association is a public interest organization dedicated to promoting health justice and sustainability. A central focus of the OCA is building a healthy, equitable, and sustainable system of food production and consumption. We are a global clearinghouse for information and grassroots technical assistance.

OCA may contact you concerning our work or the work of our coalition partners. We will not give your name to other organizations. You may be notified about participating with outreach educational activities such as: lectures, media interviews, demonstrations, teach-ins, phone trees, newsletters (*Organic Bytes*), website updates, leaflet distribution, book sales, etc.

Our volunteer management system is designed to allow you to participate with us in areas of your choosing. If you have not submitted/updated your choices, please do so in order for us to best work together.

National Grassroots Network:

We currently have over 850,000 people in our data base, including subscribers to our electronic newsletter, members, volunteers, and supporters, and 3000 cooperating retail coops, natural food stores, CSAs, and farmers markets.

Support the OCA with a tax-deductible contribution

Contact the Organic Consumers Association

Your email:

Your name:

To:

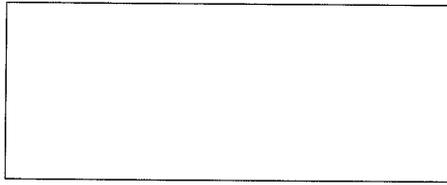
select a recipient

Subject:

Message: (2800 char max)

Please include the url / web page pertaining to your message.

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Please answer $1 + 7 =$ (required to stop form spam)

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Exhibit I

Begin forwarded message:

From: Organic Consumers Association <ronniecummins@organicconsumers.org>

Date: August 15, 2013, 6:34:16 AM PDT

Subject: Organic Elite Sit on Wallets & No Fracking on Public Lands

Reply-To: <ronniecummins@organicconsumers.org>

Is this email not
displaying correctly?
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ESSAY OF THE WEEK

MIA from the Latest GMO Labeling Battle: The Organic and 'Natural' Elite

The Organic and Natural Elite are "missing in action" again.

With just 10 weeks to go before Washington State voters start casting their ballots to decide yes or no on Washington's critical [I-522 GMO labeling initiative](#), the wealthy corporate giants of the organic food, "natural" products and vitamin supplements industries are still sitting on their wallets.



Will we see a repeat of last year? When these companies talked the talk, but never walked the walk? When they let California's Proposition 37 initiative to label GMOs fail by a sliver while they made excuses for not helping the campaign?

Or will these wealthy companies – Whole Foods, Trader Joe's, Ben & Jerry's, Horizon, Silk, Hain and others – companies that spend millions promoting their images so you'll spend your hard-earned dollars on their products - stand up and be counted this time?

Read the essay

ACTION ALERT

Conscientious Supporter: Thank You Dr. Bronner's!

We hear it from so many companies. How they really care about their customers. How their products are safe and healthy. How they espouse good, old-fashioned, feel-good values.

How they support consumers' right to know about GMOs.

But when it comes to actually taking a stand on behalf of consumers, and especially when it comes to putting their money where their mouths are, what do we hear from most CEOs and their PR flacks?

Excuses. One after another.

But not Dr. Bronner's Magic Soaps! Dr. Bronner's, a fifth-generation family-owned business, believes consumers should have the right to know if their food, or other products, contain genetically modified organisms (GMOs). So the Bronner Family has donated \$1 million so far to YES on I-522, the campaign to pass a GMO labeling initiative in Washington State.

It's great to know that there are still a few companies out there that have a conscience. They deserve our thanks!

TAKE ACTION: Tell the Bronner Family 'Thank you!' for supporting I-522 and our Right to Know!

Say 'Thanks' on Dr. Bronner's Facebook page

Watch Dr. Bronner's YES on I-522 video



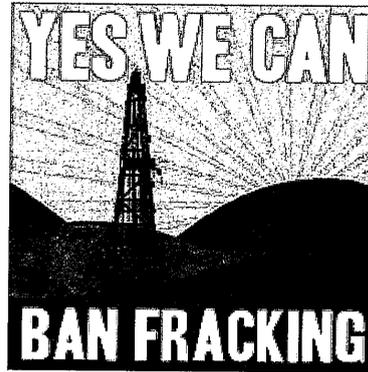
ACTION ALERT

This Land Is (Not?) Your Land

When is this land not your land or our land? When the President of the United States and the Bureau of Land Management (BLM) conspire to open 600 million acres of Federal and Native American land, *including our national parks*, for fracking.

Recent reports suggest fracking is contaminating our groundwater with heavy metals and arsenic. Is this the legacy we want to leave our kids?

On Aug. 21, you can join Americans Against Fracking for a national call-in day to President Obama. Call the President at 1-888-660-2594. You can tell him: "*Fracking threatens the air we breathe, the water we drink, the food we eat, the communities we love and the climate on which we all depend. We need to ban fracking now.*"



Also, until Aug. 23, the BLM is seeking public comments on its proposal to weaken the rules for fracking on public lands. Please sign the petition below to let President Obama and the BLM know you want stronger, not weaker, rules for fracking on public lands!

TAKE ACTION: Tell the President and the BLM: Don't Frack America's Public Lands!

[Learn more about fracking and arsenic in groundwater](#)

SUPPORT THE OCA & OCF

Let's Be Reasonable. Or Not.

"Reasonable people adapt themselves to the world. Unreasonable people attempt to adapt the world to themselves. All progress, therefore, depends on unreasonable people."
– George Bernard Shaw

If you're reading this, you're probably a member of the Unreasonable People Club.

You know. One of those people who rails against the invisible-yet-ubiquitous forces that want us to believe all is well with the world. Even as our food system disintegrates, our farms are fracked, our soil is soaked in toxins.



And our democracy disappears.

One of those people who can't just turn a blind eye, can't carry on without a fuss. A tilter at windmills. Is that you?

We hope so. Because, without you, there would be no progress. And boy, do we need progress. On so many urgent fronts.

In just 10 short weeks, Washington State will start mailing ballots to voters. On that ballot will be one of today's most urgent food rights issues: I-522, a citizens' initiative to label GMOs. The outcome of the final Nov. 5 tally could determine the future of GMO labeling in the entire country.

So while it may seem unreasonable to try to beat the likes of Monsanto and Big Food, we know you're up to the task. Please help us win in Washington, and support future GMO labeling laws, with your donation today. Thank you!

Donate to the Organic Consumers Association (*tax-deductible, helps support our work on behalf of organic standards, fair trade and public education*)

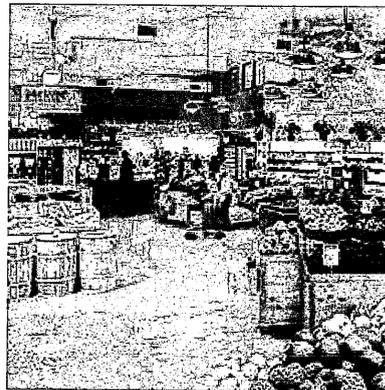
Donate to the Organic Consumers Fund (*non-tax-deductible, but necessary for our legislative efforts in Washington, Vermont and other states*)

ORGANIC RETAIL AND CONSUMER ALLIANCE

Top Grocer Spotlight: Good Earth Natural Foods

Mark Squire, co-owner and manager of Good Earth Natural Foods in Fairfax, Calif., has one of the most celebrated resumes in the retail organic food industry.

In the 1980s, Squire pioneered California's organic certification standards and eventually served on the Board of Directors for the California Certified Organic Farmers (CCOF). He was instrumental in creating the Non-GMO project and now serves on the organization's board. From 1988-1993, Squire served on the board and then on staff of the Organic Crop Improvement Association, which was at the time the largest certifier of organic foods worldwide. He also helped write Measure B, the Marin County initiative that prohibits the outdoor cultivation of genetically modified organisms (GMOs). The measure passed by 61 percent of the popular vote in 2004.



That's a lot of extra work for a guy running a retail grocery store. But Squire wouldn't have it any other way. And, he says, if not for his passion for organics and his commitment to providing the best possible selection of locally-sourced organic foods, Good Earth probably wouldn't have such a loyal customer base.

But it does. So loyal that customers recommended Good Earth for a slot on OCA's list of Top 'Diligent Dozen' Right to Know Grocers. And we agreed.

[More about Good Earth Natural Foods](#)

[More about the Right to Know Grocers Contest](#)

NEW REPORT

ALEC at 40: Turning Back the Clock on Prosperity and Progress

Happy birthday to the American Legislative Exchange Council (ALEC), the anti-consumer, anti-environment, anti-workers' rights lobbying group responsible for introducing 466 bills in 2013.

According to a [new report](#) (.PDF) by the [Center for Media and Democracy](#) (CMD), "ALEC is going to new lengths to hide its lobbying of legislators from the public eye. It has taken to stamping all its documents as exempt from state public records laws, dodging open records with a 'dropbox' website, and other tricks."



The report says that this year ALEC introduced 77 bills to advance a polluter agenda, 17 of which became law. The "model" bills promote a fossil fuel and fracking agenda and undermine environmental regulations. The CMD also identified 71 ALEC bills to cap damages, limit corporate liability or "otherwise make it more difficult for citizens to hold corporations to account when their products or services result in injury or death."

[Learn more](#)

[Read the report \(.PDF\)](#)

ORGANIC TRANSITIONS

Fighting Climate Change. One Acre at a Time.

Like an old reliable Ford 9N hauling its way out of a mud bank, the idea that agriculture can be used as a tool to reverse climate change is starting to gain traction.

If we all agree that climate change is the result of too much carbon in the atmosphere, then we also agree that we need to reduce carbon emissions. **But what if we could also pull carbon out of the air, and sequester it in the earth, just by changing how we manage farms?**



We can, says Courtney White (pictured), founder and creative director of the Quivira Coalition. White explains that by combining the use of cover crops, organic no-till farming and planned rotational grazing, not only can we grow carbon-neutral food, but we can actually grow carbon-negative food.

We may not think of biological processes as tools or technologies. But tools like no-till farming and the holistic management of grass-fed beef are proving to be the most effective technologies to combat climate change.

Food activist Michael Pollan puts it this way:

"We have to think about what technology means. Does it only mean hardware and intellectual property? If we limit it to those two definitions, we're going to leave out a lot of the most interesting technologies out there, such as methods for managing the soil and growing food that vastly increase [agricultural] productivity and sequester carbon but don't offer something you can put into a box."

[More on Carbon Ranching](#)

[More on Pollan, agriculture and climate change](#)

LITTLE BYTES

Essential Reading for the Week

[What You Need to Know About Farmed Shrimp](#)

[Monsanto's GMO Crops Already Planted in North Dakota](#)

[Israel Will End Fluoridation in 2014, Citing Health Concerns](#)

[Chipotle Is Keeping Its Meat Antibiotic-Free After All](#)

[The Downside of Texas Fracking: Ample Oil, No Water](#)



[Koch Industries: Secretly Funding the Climate Denial Machine](#)

MESSAGE FROM OUR SPONSORS

Organic Groceries Delivered to Your Door

Ever thought about trying Green PolkaDot Box, the national door-to-door discount distribution service for organic and non-GMO foods, but just weren't ready to commit to a full membership? Now's your chance to take Green PolkaDot Box for a spin. For a limited time, Green PolkaDot Box is offering a \$10 Trial Membership. To take advantage of this limited-time offer go to the website and begin shopping. Select the items you want and add them to your shopping cart. Then click on the checkout button and fill in your zip code. When you check out you'll be able to see the savings on your order calculated as if you were a member, so you can compare the difference with or without membership. You'll then have the option to purchase a membership and receive the difference in cost benefits. After you receive a Green PolkaDot Box and evaluate the convenience, quality and savings on your first "trial" order, you can decide to become a member. If you do, you can apply your \$10 towards the \$50 annual membership fee.



Green PolkaDot Box is one of the few, if not the only, online merchants that

refuses to carry any genetically modified foods and ingredients.

[follow on Twitter](#) | [friend on Facebook](#) | [OCA on Pinterest](#) | [Donate](#)

Please forward this publication to family and friends, place it on web sites, print it, duplicate it and post it freely. Knowledge is power!

Organic Bytes is a publication of [Organic Consumers Association](#)

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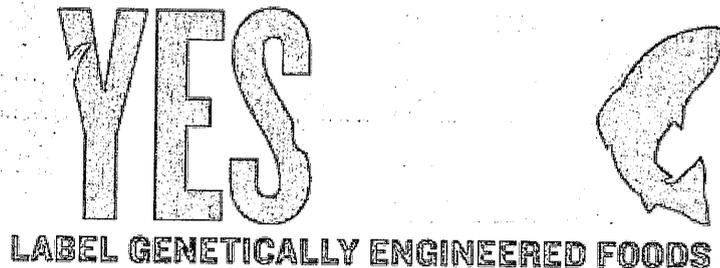
your city, your state your zip code

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Exhibit J

----- Forwarded message -----
From: **Delana Jones, Yes on 522** <info@yeson522.com>
Date: Wed, May 29, 2013 at 10:13 AM
Subject: The AmeriCone Dream
[REDACTED]



Dear Brett,

Our hearts melted like ice cream on a hot day when the good folks at Ben & Jerry's called and let us know that they were endorsing Yes on I-522!

Share this exciting news with your friends.

You see, Ben & Jerry's is a business that represents the AmeriCone dream. They support labeling of genetically engineered food in Washington State because they are proud of what is in their ice cream.

"Ben & Jerry's is thrilled to be joining Whole Foods Market, PCC Natural Markets, Nature's Path, Dr. Bronner's and the growing coalition of businesses, organizations, and people supporting Yes on I-522. Cherry Garcia, Half-Baked, Chunky Monkey, Phish Food, collectively contain hundreds of ingredients, and we believe you have the right to know what they are and where they came from. We support Initiative 522 because we support transparency and our customers' right to know what's in their food." --Jerry Greenfield

If you agree with Jerry that you deserve the right to know what is in your food, please share this news with five of your friends. The first 52 people to use our page to share the news will receive a coupon for some delicious Ben & Jerry's.



From our table to yours,

Delana Jones

Campaign Manager

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Contribute



This email was sent to bnoble09@gmail.com | [Unsubscribe](#)

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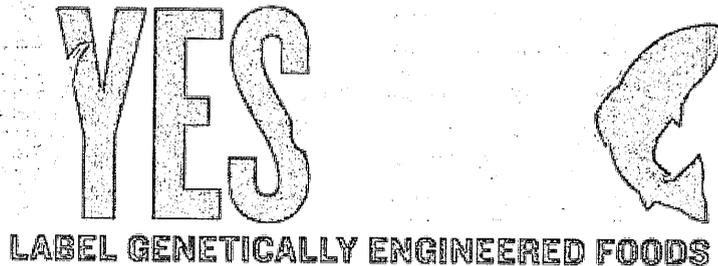
Exhibit L

----- Forwarded message -----

From: **Delana Jones, Yes on 522** <info@yeson522.com>

Date: Wed, May 29, 2013 at 10:13 AM

Subject: The AmeriCone Dream
[REDACTED]



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If you agree with Jerry that you deserve the right to know what is in your food, please share this news with five of your friends. The first 52 people to use our page to share the news will receive a coupon for some delicious Ben & Jerry's.

Share This

From our table to yours,

Delana Jones

Campaign Manager

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Contribute



This email was sent to bnoble09@gmail.com | [Unsubscribe](#)

Exhibit M

**STAND FOR YOUR
RIGHT TO KNOW IF OUR
FOOD IS GENETICALLY
ENGINEERED**

**WE HAVE THE RIGHT
TO CHOOSE THE FOOD
WE EAT AND FEED
OUR FAMILIES**

**THE PATH TO NATION
LABELING IS THROUGH
THE STATES**

Chemical companies genetically engineer DNA from bacteria into food crops to either produce or tolerate the pesticides they sell. This foreign DNA produces foreign proteins in every cell of the plant that we eat in our food. No long-term independent safety studies have been performed on adverse health effects. Overuse of pesticide is creating resistant superweeds and superbugs like Monsanto and Dow are engineering resistance in food crops to much more toxic weed killers like Dicamba and 2,4 D, the main ingredient in Agent Orange.

THESE ARE A FEW OF THE 18-IN-1 USES. GIVE THEM A TRY!
FACE AND BODY WASH: GET WET, APPLY SOAP TO HANDS, WASH CLOTH OR LOOFER, LATHER UP, RINSE OFF AND TINGLE FRESH AND CLEAN.
FRUIT AND VEGETABLE WASH: ADD 3 DASHES TO A SINK FULL OF WATER, SOAK FOR 2 MINUTES AND THEN RINSE CLEAN.
HOUSEHOLD CLEANER: DILUTE SOAP WITH WATER 1:4 FOR LIGHT CLEANING, OR USE FULL STRENGTH FOR HEAVY-DUTY, GREASE-CUTTING JOBS.
MADE IN U.S.A.

IMPORTANT GMO INFO LABEL

Dr. Bronner's Magic Soaps

18-in-1 Hemp PEPPERMINT PURE-CASTILE SOAP MADE WITH ORGANIC OILS

INGREDIENTS: Water, Organic Coconut Oil*, Potassium Hydroxide**, Organic Olive Oil*, Mentha Arvensis*, Organic Fair Deal Hemp Oil, Organic Jojoba Oil, Organic Peppermint Oil*, Citric Acid, Tocopherol

*CERTIFIED FAIR TRADE INGREDIENTS
**None remains after saponifying oils into soap and glycerin.

100% Post-Consumer Recycled Plastic Bottle!
These soaps are more concentrated than traditional soaps. Dilute with water. Clouds when cold. Put in warm room/water: clears at -70F.
WARNING! Keep Out of Eyes. If Cap Clogs, Poke it Clean. Do Not Squeeze Bottle and Shoot Out Soap. Soap can Clog and Spurt with Pump Dispensers. Flush Eyes Well with Water for 15 Minutes, Consult a Physician if Irritation Persists.

DR. BRONNER'S MAGIC "ALL-ONE!"
www.drbronnersonline.com

certified by IFOC
-2016-02-15
[USDA National Organic Program]

fair for life

CERTIFIED UNDER THE USDA NATIONAL ORGANIC PROGRAM

NO DETERGENTS
NO FOAMING AGENTS

ONE OF HUMANITY'S OLDEST AND SIMPLEST PRODUCTS
SOAP IS MADE BY SAPONIFYING OILS WITH ALKALI, WITH
NO WASTE GENERATED. THE ALKALI IS EITHER SODIUM
(FOR BARS) OR POTASSIUM (FOR LIQUIDS) THROUGH SALT WATER.
MADE BY RUNNING ELECTRICITY THROUGH SALT WATER.
NO ALKALI REMAINS IN OUR SUPERB SOAPS. ALL GLYCERIN
IS RETAINED. OUR UNIQUE OLD WORLD FORMULA = HIGH
LATHER, CLEANSING AND SMOOTH, MILD AFTERFEEL.

YES ON 522

LABEL GENETICALLY ENGINEERED FOODS

EDUCATE
DONATE
VOLUNTEER
www.YesOn522.com

NON-GMO VERIFIED

904 28, Escondido, CA 92033
1877-775321 - www.drbronnersonline.com
Oregon 10th Certified Organic

18787-77532 5

DON'T BE FOOLED BY DECEPTIVE TV ADS like Prop 37 will face an attack of relentless funding by pesticides and junk food manufacturers. They seek to mislead voters into thinking simple labeling law is somehow a plot by lawyers to get rich while food prices sky rise. These same hollow arguments against consumers' right to know have been made against previous labeling regulation such as color, origin and calorie disclosure. It's wrong. American democracy is hijacked by pest manufacturers who spend vast sums of money to keep consumers in the dark.

1522 CAN WIN WITH YOUR VOTE. The campaign has demonstrated through polling that their simple ads reminding voters of their fundamental relationship and right to what's in their food cuts right through the enough voters are reminded of their own and power, 1522 can win!

Wherever you live in the US, please sign up at www.YesOn522.com to donate and volunteer to answer the opposition's lies on TV, while a huge grassroots surge reaches voters directly.

we have a right to know important information about the food we eat and feed our families - such as sugar and sodium levels, the country of origin, whether flavors and other ingredients are natural or artificial, and if fish is wild or farm-raised. also should have the right to choose whether we want to buy and eat genetically engineered food, just as citizens in over 64 other countries do, including Europe, Japan and even China. Labels ensure transparency and preserve the freedom to make our own decisions about the food we eat. The government has conducted independent safety tests on GMOs. The Washington State Nurses Association endorses labeling as a means of tracing health issues that may result from consuming GMO foods. S. companies already label genetically engineered crops for markets in the 64 countries that have labeling laws, including some of our largest trading partners. Genetically engineered crops like wheat and rice have contaminated conventional crops in the Northwest and Southeast. This has led some countries to reduce imports from our farmers, jeopardizing their economic health and livelihoods. 22 was brought to the ballot by more than 350,000 citizens and draws strong, statewide support from farmers, fishing families, health care professionals, moms and dads, business owners, Republicans, Democrats, and independents across the state. Powerful chemical corporations that genetically engineer food oppose labeling because they care about their profits, not our right to know. Labeling lets us trust your own judgment. You should have the freedom to decide for yourself what to eat - not corporations, the government, or special interests. Our health and food decisions are up to you. Vote for the right to know what's in your food. YES on 522. For more information go to: www.yeson522.com

PLEASE: DONATE



www.YesOn522.com

Exhibit N

What is in your food?

Shouldn't Genetically Engineered foods be labeled?

Join 1, 2, or all 3 *free* GMO-Free events.



JOIN

Jubilee Naturals – Sumner

909 Main St Sumner, WA 98390
(253) 447-7921

SUMNER ANIMAL GRUB

800 Traffic St Sumner, WA 98390
(253) 863-5511

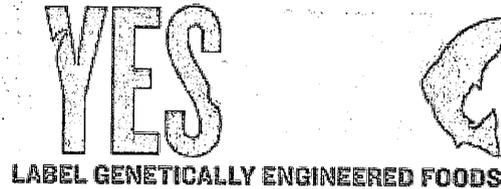
SUMNER PUBLIC LIBRARY

1116 Fryar Ave Sumner, WA 98390
(253) 548-3306

On Saturday, September 14th
...and learn about what's really in
your food.

Exhibit O

From: Lennon Bronsema, Yes on 522 [mailto:info@yeson522.com]
Sent: Tuesday, September 10, 2013 11:00 AM
To: info@brecourtstrategies.com
Subject: Monsanto dumps \$4.5M into Washington



Hello Friend,
Holy batman!

I don't know about you, but none of us at Yes on 522 have that kind of cash sitting around to buy elections with.

As soon they heard about Monsanto's millions a couple of our supporters called. They know our campaign is founded on the principles of grassroots activism. So they made us a deal.

If we can get 1,000 donors before 12am Saturday they'll match your gift. So if you give even just \$3 - it's really like you're giving \$6.

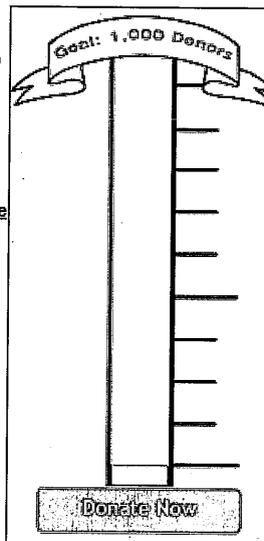
That's a pretty sweet deal - and one I know you'll step up to help us with.

There is only one reason Monsanto is cutting checks this big: *they're more worried about protecting their profits than letting shoppers have the right to know what they're buying at the grocery store.*

Even \$3 counts towards the goal of 1,000 donors by midnight Saturday so click here right now to rush your donation to us.

If we all come together as the national movement for labeling GMOs we can defeat whatever piles of cash Monsanto throws at us.

Cheers,
Lennon Bronsema
Finance Director
Yes on 522



Contribute

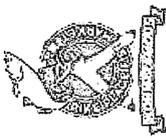


Yes on 522, (206) 452-9170 | 2235 1st Ave S, B-102, Seattle, WA 98134
This email was sent to info@brecourtstrategies.com | Unsubscribe

RECEIVED
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION

Exhibit P

COALITION PARTNERS



WASHINGTON
TOXICS
COALITION

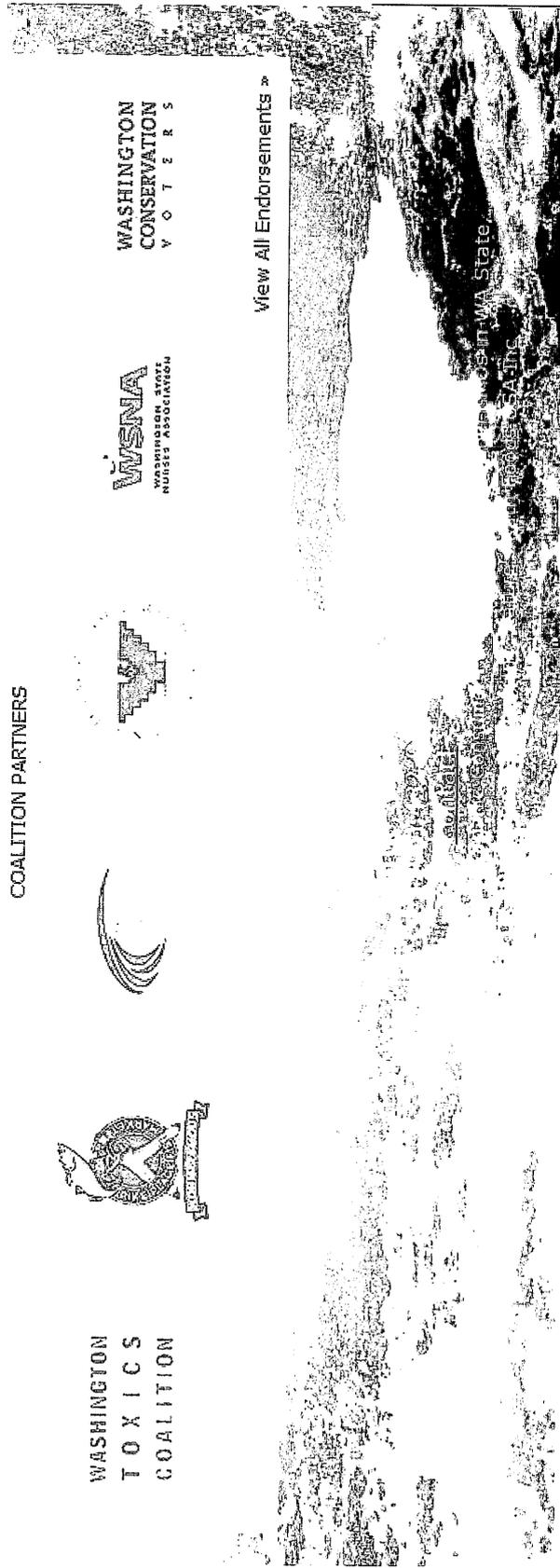


WSNA
WASHINGTON STATE
NURSES ASSOCIATION



WASHINGTON
CONSERVATION
VOTERS

[View All Endorsements >>](#)



RECEIVED
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION

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OCT 28 2013
PUBLIC DISCLOSURE COMMISSION

Exhibit Q

Pammi Larry and Howard Vileger WA September Speaking Tour

Today | ◀ ▶ | October 2013 | Print Week | Month | Agenda

Sun Mon Tue Wed Thu Fri Sat

Pammi Larry Washington Tour

12pm Work Party & Potlu 7pm Fire Station # 71 - P 6pm GMO Labeling Fundr Pammi Departs

Sun	Mon	Tue	Wed	Thu	Fri	Sat
		Oct 1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

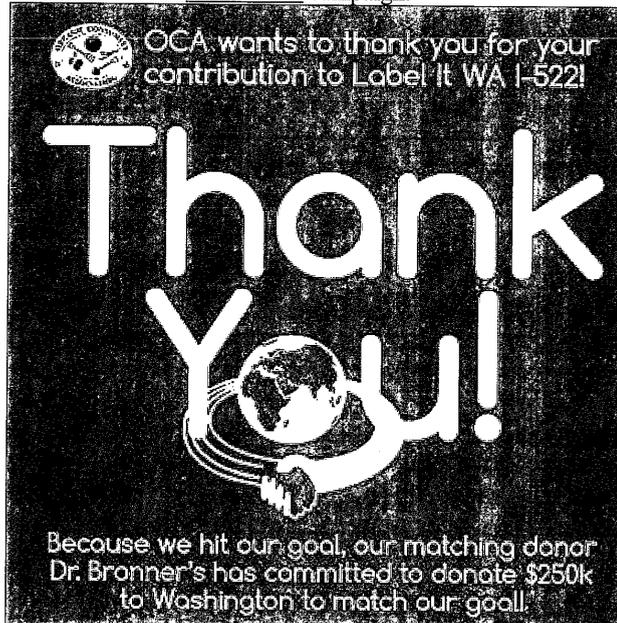
Events shown in time zone: Pacific Time



Exhibit R

We did it!

Thanks to everyone's amazing response to our campaign, Dr. Bronner's Magic Soaps, who was our anonymous donor, has gone public with their support and will now be donating \$750k to the I-522 campaign, instead of the \$500k they originally planned to donate. So, between the \$250k we raised, and the \$750k Dr. Bronner's is donating, that's \$1 million for the Label It Wa campaign.



RECEIVED
OCT 28 2013
PUBLIC DISCLOSURE COMMISSION

Exhibit S

From: Organic Consumers Association
Sent: Thursday, August 1, 2013 6:21 AM

Reply To: ronniecummings@organicconsumers.org

Subject: Winning Our Hearts and Minds? Monsanto and Big Food Pull Out the Big Guns

Is this email not displaying
correctly?
[View it in your browser.](#)



Organic Bytes

Health, Justice and Sustainability News from the Organic Consumers Association
A weekly e-newsletter edited by Katherine Paul and Ronnie Cummins

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ESSAY OF THE WEEK

Winning Our Hearts and Minds? Monsanto and Big Food Pull Out the Big Guns

Monsanto and Big Food are taking the battle for consumers' hearts and minds to the next level. And it's no coincidence that they're pulling out the big guns just as the Washington State [I-522 campaign to label genetically modified organisms](#) in food products is gaining steam.

Can industry front groups and slick public relations firms convince us that the products they're peddling are not only safe, but good for us? Will the millions they spend on websites and advertorials pay off?

You be the judge.

The freshly launched [GMOAnswers.com](#) is funded by the biotech industry, which claims it just "wants to talk." And the recently formed [Alliance to Feed the Future](#), representing more than 50 multinational food, agribusiness and biotech companies, wants to give us the "real" scoop on our food system.



Read the essay

ACTION ALERT

Organic Eggs? Not If the USDA and FDA Can Help It!

Are the U.S. Department of Agriculture (USDA) and the Food and Drug Administration (FDA) determined to keep chickens penned up, and rob consumers of the right to real free-range organic eggs?

It would seem so. First, the USDA's National Organics Program refuses to enforce standards set by the National Organic Standards Board requiring organic farmers to allow their hens outdoors. Responding to complaints that organic farmers were violating the standards, the NOP said they have more "urgent" matters to deal with.

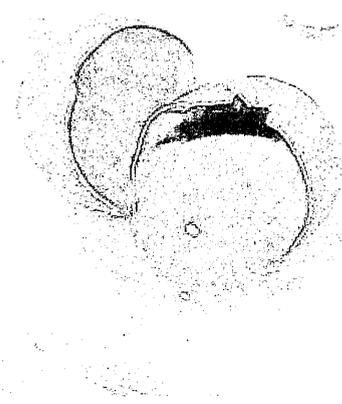
Now, the FDA wants to make it nearly impossible for organic farmers to raise free-range hens. Despite weak scientific evidence, the FDA says it's risky for organic farmers to let their hens come in contact with wild birds. So the FDA is proposing costly, redundant and onerous so-called "food safety" measures on organic farmers who let their hens outdoors.

The USDA and the FDA need to hear from us. Eggs from organic free-range hens raised outdoors are more nutritious than eggs from hens kept indoors and raised on exclusively on grain. Not to mention how much more the animals suffer from being penned up.

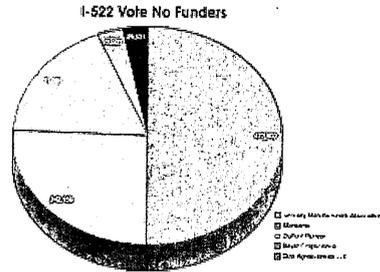
TAKE ACTION: Tell the USDA and FDA: Set Organic Chickens Free!

I-522 UPDATE

Leader of the Pack: GMA Tops List of NO on I-522 Donors



Who wants you to have the right to know whether or not your food has been genetically engineered or not? Leading organic and natural health companies. Consumer groups such as the OCA and the Alliance for Natural Health. Nonprofit watchdog groups. Thousands and thousands of organic and natural health consumers.



Who doesn't? The Grocery Manufacturers Association (GMA) and its dues-paying members. Monsanto. DuPont. Bayer CropSciences. Dow Agrisciences.

So far the GMA is the largest donor to the NO on I-522 campaign, which wants desperately to defeat I-522, Washington's citizens' initiative to label GMOs. The GMA represents more than 300 corporations including Kraft, Kellogg's, PepsiCo, Coca-Cola, Unilever, Hershey's, ConAgra, General Mills and a long list of other companies that want your money – but don't want you to know what they're selling you.

The GMA member roster also includes Starbucks, Target and Safeway, owner of the O Organics™ brand. Which is why we hope you'll sign our petition asking the leaders of those companies to support I-522 and ditch the GMA.

See Who's Funding NO and YES on I-522 Campaigns

TAKE ACTION: Tell Safeway, Starbucks and Target: Stop bankrolling campaigns to defeat GMO Labeling!

SUPPORT THE OCA & OCF

You Rock!

You did it again. Thank you!

Thanks to almost 4,000 of you who contributed to our recent appeal for support for I-522, we raised the \$150,000 we needed in order to receive a generous matching grant from Mercola.com.

We were all disappointed when we lost Prop 37,



the GMO labeling initiative in California last year. But together, we rallied. Now we're more determined than ever to win this year in Washington State. And beyond.

I-522 is a must-win campaign. As the donations to the NO on I-522 campaign pour in from Big Food and the Biotech Bullies, we will keep pressuring the natural and organic companies who sat on the sidelines last year while you emptied your pockets to fight this battle.

In the meantime, we're grateful for your generous support and your unstoppable determination to win this battle. Thank you. From all of us.

Donate to the Organic Consumers Association (tax-deductible, helps support our work on behalf of organic standards, fair trade and public education)

Donate to the Organic Consumers Fund (non-tax-deductible, but necessary for our legislative efforts in Washington, Vermont and other states)

TRAITOR BOYCOTT

Naked Truth: Naked Juice Not So Natural

No wonder PepsiCo, owner of the Naked Juice brand, spent \$2.5 million to defeat California's GMO labeling law last year. Turns out the Junk Food Giant isn't too fond of honest labeling, even when it comes to its so-called "all-natural" Naked Juice.

In a big win for consumers, PepsiCo has been ordered to pay \$9 million to settle a class-action lawsuit. Why? Because the courts agreed that adding synthetic fiber material made by Agri-Giant Archer Daniels Midland to Naked Juice products equates to deliberately deceiving consumers.

And that's not all. The lawsuit accused Pepsi of adding a host of other questionable ingredients, including zinc oxide, ascorbic acid and calcium pantothenate, made from formaldehyde, a carcinogenic compound.

Pepsi denied the claim that Naked Juice contains GMOs. **But the undeniable truth?**



Pepsi doesn't want you to know what's in Naked Juice, or any of its other products. And as a member of the Grocery Manufacturers Association (GMA), which is so far the top donor to campaign to defeat I-522, a GMO labeling initiative in Washington State, Pepsi is still working to keep you in the dark.

[Learn more](#)

TAKE ACTION: Tell Naked Juice to Clean up its Act and Support I-522, Washington State's GMO Labeling Initiative

ORGANIC INDEX 8.1.13

Gaining Ground: Organic and 'Natural' Grab 13% of All U.S. Grocery Sales

Maybe it's the high cost of healthcare. Or the fact that organic food just tastes better. But American consumers are increasingly willing to pay a premium price for foods and products that they believe are healthier, environmentally sustainable, and humanely produced.

Organic and "natural" products now constitute over 13% of U.S. grocery purchases. Sales of certified organic products are projected to reach approximately \$35 billion in 2013, or 4.5% of total grocery sales. That number amounts to only half the sales of so-called "natural" products - uncertified, and routinely produced with pesticides, chemical fertilizers, animal drugs, GMOs, and sewage sludge - which are expected to exceed \$70 billion in 2013.

Unfortunately many, if not most consumers are unclear about the qualitative difference between certified organic and most so-called "natural" products. **Given this rampant mislabeling in the marketplace, if so-called "natural" products containing GMOs and synthetic chemicals and residues had to be truthfully labeled, organic sales would likely double within a short period of time.**

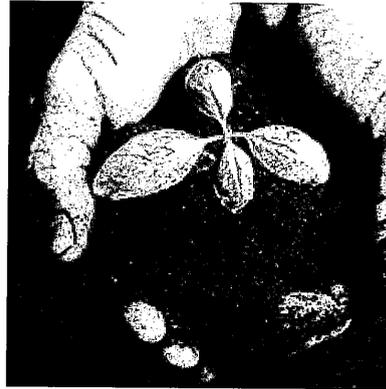
[Get the facts on organics and "natural" here](#)



ORGANIC TRANSITIONS

No Small Thing: Reversing Climate Change through Sustainable Agriculture and Biochar

For the past five years, OCA has been passionately talking and writing about how organic farming, ranching, and forestry practices can potentially reverse global warming and save us from climate catastrophe.



There were times when we thought we were preaching only to the choir. **But now a growing number of leading food and environmental writers, including Michael Pollan and Mark Hertsgaard, are joining the chorus and educating the public on how we can use sustainable farming, ranching and biochar practices to exponentially increase plant photosynthesis and soil carbon sequestration on hundreds of millions of acres of farmland, pasture, and rangeland.**

This Great Transition has the potential to bring our current greenhouse gas pollution down from our 400 ppm of CO₂ to 350 ppm – the number scientists say we need to achieve if we're going to survive. If we can achieve this, we can stabilize our dangerously out-of-control global climate. And in the process, we'll dramatically increase soil fertility, biodiversity, and moisture retention.

As Pollan puts it, moving away from factory farms and industrial/GMO agriculture to organic no-till farming and rotational grazing "gets us out of one of the worst aspects of environmental thinking - the zero sum idea that we can't feed ourselves and save the planet at the same time. It also raises our spirits about the challenges ahead, which is not a small thing."

[Read Michael Pollan on agriculture and climate change](#)

[Read Mark Hertsgaard on how biochar, composting and biochar energy production can reverse global warming](#)

LITTLE BYTES

Essential Reading for the Week

Consumer Alert: Fertilizer Industry's
Arsenic-Tainted Fluoride Laced into Drinking
Water of 150 Million Americans

Nasty Pesticide Broken Down by Probiotic
Used in Culturing Food

Sacramento's Farm-to-Fork Food Bank
Changes Lives

Study Shows High Levels of Arsenic in
Water Near Fracked Gas Wells

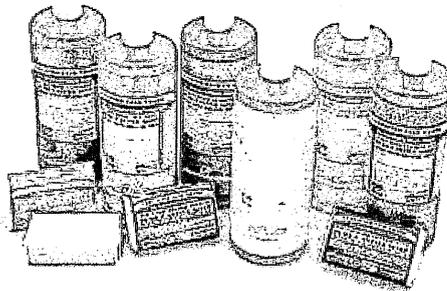
Survey: Only 15% of Farmers would Eat GMO Food

Consumer Alert: Most Common Vitamins, Including Children's Vitamins, Found to
Contain GMOs



MESSAGE FROM OUR SPONSORS

Dr. Bronner's Magic Pure Castile Classic
Soaps



FAIR TRADE ORGANIC
LIQUID AND BAR SOAPS

Our Liquid Soaps are completely
biodegradable & vegetable-based. They are
made with Certified Fair Trade and Organic
Oils! Simple Ecological Formulations Based
on Old-World Quality and Expertise.



WASH WITH A CLEAN CONSCIENCE
(and shave, shampoo and moisturize too!)

Unlike any you've ever used. A combination of organic extra virgin coconut, olive, jojoba and hemp oils, together with pure essential oils, creates a unique soap that cleans effectively without being aggressive and produces a velvety-lather that leaves the skin silky-smooth and refreshed.

Now available in two new Magic liquid fragrances: Rose and Citrus Orange

[follow on Twitter](#) | [friend on Facebook](#) | [OCA on Pinterest](#) | [Donate](#)

Please forward this publication to family and friends, place it on web sites,
print it, duplicate it and post it freely. Knowledge is power!

Organic Bytes is a publication of [Organic Consumers Association](#)

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Exhibit T

The Spokesman Review, Jim Camden, September 29, 2013

<http://www.spokesman.com/stories/2013/sep/29/initiative-522-ads-dispute-whether-pet-food-would/>

Ads dispute whether pet food would have to be labeled for GMOs

Jim Camden The Spokesman-Review

The opening salvo in the battle over the proposal to label genetically modified foods includes ammunition that hit the mark last year in California: Food you buy for Rover would have to be labeled, if it contains those products, recent commercials for opponents say, but steaks you throw on the grill would not.

Wrong on both counts, say supporters of Initiative 522. Pet food isn't covered by the initiative, but genetically modified meats would have to be labeled if they ever reach the local supermarket. Each campaign can produce legal theories of the state's complicated initiative case law to support their claims. The Yes campaign has mounted a response ad that the No campaign is rebutting. The average voter might wonder whether it's worth fighting about.

It likely is, because the pet food argument comes from the playbook that defeated a ballot measure last year in California. Proposition 37 had similar wording and many of the same big-spending donors, with major natural-product companies like Mercola and Dr. Bronner's Magic Soaps contributing to the Yes campaign and chemical companies like Monsanto and DuPont subsidizing the opposition. Proposition 37 also enjoyed an early lead in public opinion polls, as I-522 does now. But a \$44 million campaign turned the tide, in part with an argument that Proposition 37 was poorly written and had major inconsistencies, like requiring labels on canned pet food but not fresh meat.

"Pet food would be covered but meat for human consumption would be exempt," Dan Newhouse, a former state agriculture secretary, says in recent commercials against I-522.

I-522 doesn't mention pet food in its 2,448-word text. It does exempt meat that has been fed or injected with genetically modified products from the labeling requirements, but would require meat from a genetically modified animal to be labeled. No genetically modified animals have been approved by the federal government for commercial sale, although the Food and Drug Administration is reviewing a request to allow farm-raised, genetically modified salmon to be sold to the public.

Newhouse doesn't draw any distinction between animals that eat genetically modified food and those that are genetically modified, a point that has the Yes side crying foul.

The key point is that the initiative doesn't define "food," said Rob Maguire, an attorney for the No campaign. So courts would look at the definition in Article 69 of state statutes, which deals with food labeling, along with federal law and the common dictionary definition of food. All include pet food. "That's just false," said Knoll Lowney, attorney for the Yes campaign. The initiative wouldn't be part of Article 69, but Article 70, so that definition doesn't apply, he said.

Courts would look first at the initiative, which says in the introductory section that its purpose is "to ensure people are fully informed about whether the food they purchase and eat was produced through genetic engineering," Lowney said.

If supporters wanted to exempt pet food, they easily could have done so in the initiative, just like they exempted meat and dairy products, medical food and food cooked at a restaurant, Maguire said.

Lowney and Maguire agree that pet food would only have to be labeled if the state Health Department includes it in rules the agency must write if the initiative passes. Lowney said there's one key difference between I-522 and Proposition 37, despite the similar wording. In California, supporters wanted their law to cover pet food, he said. Washington's supporters are only concerned about human food.

It wasn't until after I-522 was drafted that opponents in California made headway by raising the pet food issue. "By the time the whole California thing happened, (I-522) was already out there," Lowney said. That meant supporters couldn't add specific language to exempt pet food. Once an initiative begins gathering signatures, it can't be changed.

Exhibit U

SMITH & LOWNEY, P.L.L.C.

2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2882, FAX (206) 860-4187

October 16, 2013

KOIN CBS
Tim Perry, President & General Manager
222 SW Columbia St
Portland, Or 97201

To: Station Manager and Counsel

Subject: False and Illegal Advertising by No on 522 on Your Station

I am writing on behalf of the Yes on 522 Campaign as a follow up to the previous letter dated September 18, 2013, which informed you that the No on 522 Campaign's ads appearing on your station are illegal. As we explained, the No on 522 Campaign's mandatory disclosures fail to list the actual contributors and instead list the Grocery Manufacturers Association (GMA), which was illegally laundering campaign funds.

Today the Attorney General of the State of Washington confirmed that our allegations are true and filed a lawsuit against the GMA for these actions. A copy of the AG's press release and the complaint are attached. He found that the GMA's laundering of campaign funds was driven by the goal of concealing the identity of donors. According to the complaint, "the GMA board directed GMA staff to 'scope out a funding mechanism to address the GMO issue while better shielding individual companies from attack for providing funding.'" Complaint ¶ 17. By running these illegal ads, your station would be furthering this unlawful concealment of donors.

We demand that you immediately remove the illegal No on 522 Campaign ads from the air or your station will face legal liability. While we were disappointed in your station's decision to play these illegal ads after it received our first notice, you cannot justify playing these ads now that you have objective information confirming their illegality.

SMITH & LOWNEY PLLC

By 
Knoll Lowney
Claire Torrey

10/16/13

Attorney General Ferguson files suit against Grocery Manufacturers Association

[News > News Releases > 2013](#)

FOR IMMEDIATE RELEASE

[back](#)

October 16, 2013

AG alleges association skirted disclosure rules in \$7.2 million contribution to No on Initiative 522 campaign

SEATTLE— Attorney General Bob Ferguson today filed suit in Thurston County Superior Court alleging that the Grocery Manufacturers Association (GMA) violated the state's campaign disclosure laws. Ferguson alleges the GMA illegally collected and spent more than \$7 million while shielding the identity of its contributors. The funds were spent to express opposition to Initiative 522, a measure requiring labeling of genetically engineered foods, seeds and seed products in Washington.

"When Washington state voters overwhelmingly approved Initiative 276 in 1972, they voiced their desire for transparency and openness in elections," Ferguson said. "Truly fair elections demand all sides follow the rules by disclosing who their donors are and how much they are spending to advocate their views."

The Grocery Manufacturers Association is a trade association, based in Washington DC, representing more than 300 food, beverage and consumer product companies. It is the biggest donor to the No on I-522 campaign.

The Attorney General's Office alleges the GMA established the "Defense of Brands Strategic Account" within its organization and asked members to pay assessments that would be used to oppose I-522. GMA then funded opposition efforts while shielding contributors' names from public disclosure.

Ferguson alleges the GMA should have formed a separate political committee, registered with the state's Public Disclosure Commission (PDC), and filed reports indicating who contributed, how much they contributed and how the money was spent to oppose I-522.

The AGO filed suit in Thurston County Superior Court to compel the GMA to register with the PDC and file disclosure statements.

The AGO is preparing to seek a temporary restraining order asking the court to order the GMA to immediately comply with state disclosure laws.

The AGO is also requesting civil penalties and costs of investigation and trial, including reasonable attorney's fees, injunctive relief and any other relief the court deems appropriate.

The suit stemmed from a citizen action letter received by the Attorney General's Office in late August. Upon receipt of the letter, the office immediately referred the case to the PDC for investigation. Working closely with the PDC, the Attorney General's Office reviewed information provided to the PDC during its investigation and determined there was sufficient evidence to file a court action.

The complaint can be found, [here](#).

— 30 —

10/16/13

Attorney General Ferguson files suit against Grocery Manufacturers Association

The Office of the Attorney General is the chief legal officer for the state of Washington with attorneys and staff in 27 divisions across the state providing legal services to roughly 200 state agencies, boards and commissions. Attorney General Bob Ferguson is working hard to protect consumers and seniors against fraud, keep our communities safe, protect our environment and stand up for our veterans. Visit www.atg.wa.gov to learn more.

Contacts:

Janelle Guthrie, Director of Communications, (360) 586-0725

Alison Dempsey-Hall, Deputy Communications Director, (206) 641-1335

Exhibit V

If you would like to post a comment please [Sign In](#) or [Register](#)

2 Comment(s)



Posted by Now!l at 9:44 a.m. Sep. 18, 2013

Start working at home with Google. It's the most financially rewarding I've ever done. On Tuesday I got a gorgeous B/W offer having earned \$7429 this last month. I actually started five months ago and practically straight away was bringin in at least \$74. per-hour. Visit this site right here [Pew6.com](#)

Comment(s) 1-2 of 2

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What do you think?

Do you think the 1Water IPO will be a success?

- Yes
- No
- I'm not sure

This comment has been removed for violation of the visitor agreement.

2 Comment(s)



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Kurt Young

From: Maguire, Robert [robmaguire@dwt.com]
Sent: Tuesday, November 12, 2013 3:01 PM
To: Kurt Young
Cc: Phil Stutzman
Subject: RE: Citizen Action Letter filed against Supporters of I-522

Hi Kurt –

Please feel free to call me to discuss the complaint. We noticed so many issues it is not possible to fully address every question you may have in an e-mail exchange. In broad brush, however, the main issues concerning the groups you mention are set forth below.

The issue for Volunteers for I-522 and 522Parents.org is whether they are unregistered political committees. Their names suggest their primary purpose is to support a ballot measure. In addition, their websites refer to fundraising events and related activities. If they have accepted contributions to support I-522, then we understand the State's view is that they have satisfied the contribution prong of the political committee test. Given the names of the entities (which expressly indicate support for a ballot measure) and that their websites refer to various activities that might involve expenditures, it seems likely they also satisfy the primary purpose and expenditure prong of the political committee test.

Dr. Bronner's issues are more complex. Dr. Bronner's products carried special labels promoting I-522, including soliciting contributions to support I-522. Either the advertising qualified as independent expenditures or in-kind contributions to one of the pro-I-522 committees. No independent expenditures were reported, however, and it is unclear whether the value was reported or reported timely in-kind. Moreover, none of the labels or magazine advertisements carried any disclaimer indicating who paid for the advertisements.

In addition to the advertising issues, Dr. Bronner's should be listed as the sponsor for Mom's for Labeling. It was Mom's for Labeling's sole contributor. Dr. Bronner's substantial involvement in multiple committees also raises the question of whether a primary purpose of the entity included supporting I-522, requiring registration as a political committee. Furthermore, Dr. Bronner's anonymous pledges – apparently to OCA and Label it Wa -- exposes OCA and Label it Wa to liability for failing to report timely the pledges and their source.

Ben and Jerry's engaged in political advertisements apparently without timely reporting them (we noticed a large number of recent amended filings after our complaint was provided, suggesting they recognize the failure to timely report the contributions). Those advertisements ranged from billboards to radio broadcasts. None of the advertisements we saw or heard carried the full required sponsor identification information.

Similarly, PCC engaged in political advertisements apparently without timely reporting them (as is also evidenced by a recent number of amended filings). Some of the advertisements lacked any sponsor identification while others had incomplete sponsor information.

We have not noticed anything on the PDC's website indicating whether an investigation has been opened concerning any of the issues, but please let me know if any additional information would be helpful.

Rob Maguire | Davis Wright Tremaine LLP
1201 Third Avenue, Suite 2200 | Seattle, WA 98101
Tel: (206) 757-8094 | Fax: (206) 757-7094
Email: robmaguire@dwt.com | Website: www.dwt.com

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Public Disclosure Commission

T 206.245.1700
1191 2nd Avenue, Suite 2100
Seattle, WA 98101-2945
pacificallawgroup.com

Gregory J. Wong
greg.wong@pacificallawgroup.com

November 8, 2013

VIA E-MAIL & U.S. MAIL

Mr. Kurt Young
State of Washington Public Disclosure Commission
711 Capitol Way Rm. 206, PO Box 40908
Olympia, WA 98504-0908

Re: PDC Case No. T14-053 – Food Democracy Action

Dear Mr. Young:

This letter follows up on our telephone conversation and emails regarding the above case. As you know, we represent Food Democracy Action! (“FDA”) and Food Democracy Now! (“FDN”), two of the named entities in the 45-day letter that began the above case.

FDA and FDN are committed to compliance with Washington’s public disclosure laws. They understand the importance of transparency in electoral politics. Accordingly, FDA has submitted a C1pc to form a Washington State political committee and plans to file reports that disclose all contributors to its efforts related to I-522.¹ This effort fully reflects that commitment to compliance with the laws and to the importance of transparency.

In your letter dated October 30, 2013, you asked FDA and FDN nine questions. Responses to those nine questions are as follows.

1. Did you solicit any contributions on behalf of I-522?

FDA solicited contributions in support of the effort to pass I-522. FDN did not solicit contributions in support of the effort to pass I-522. To clarify, FDA and FDN are related but separate legal entities. FDN is registered with the IRS as a 501(c)(3) organization. FDA is a registered with the IRS as a 501(c)(4) organization. Importantly, FDN did not receive

¹ FDA is assembling its donor records and will file its reports in a timely manner.

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contributions or make expenditures related to I-522. All political activity took place through FDA.²

2. *Did you accept contributions on behalf of I-522?*

FDA accepted contributions in support of the effort to pass I-522. FDN did not.

3. *If yes, what did you do with those contributions?*

FDA made contributions to the Yes on I-522 political committee.

4. *Did your organizations website include a donations page?*

Yes.

5. *Did it connect to the Yes on I-522?*

No.

6. *Did you make any expenditures in support of I-522?*

FDA's sole activity related to I-522 was soliciting donations from individuals interested in supporting the passage of I-522 and then deciding to contribute to the Yes on I-522 political committee. FDA made some expenditures to cover the costs associated with this work. Those expenditures are being calculated and will be reported to the PDC.

7. *What was the source of the funds used by Food Democracy Now!?*

As stated above, FDN did not receive any funds related to I-522. FDA received funds related to I-522 that were raised from online donations.

8. *Did any funds pass through Food Democracy Action and get sent to I-522?*

As stated above, FDA raised funds to support the effort to pass I-522. FDA decided to contribute \$200,000 to the Yes on I-522 political committee.³ No funds were "passed through" in the sense that no contributions were earmarked as designated specifically for the Yes on I-522 political committee.

² See Exhibit 1 – PDC report of donors to the Yes on I-522 political committee dated November 7, 2013, on which FDA appears, but FDN does not.

³ See Exhibit 1.

Mr. Kurt Young
November 8, 2013
Page 3

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Public Disclosure Commission

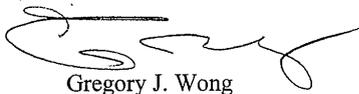
9. *Were any of the donations received by Food Democracy Now earmarked or otherwise designated for I-522?*

As stated above, FDN did not receive any donations related to I-522. FDA solicited funds to support the passage of I-522 in general. FDA decided to contribute to the Yes on I-522 political committee. But no earmarking occurred. The PDC's Political Committee Manual explains that earmarked contributions are given to one committee "for spending on behalf of one or more other candidates or committees."⁴ Here, FDA solicited contributions to benefit the general effort to pass I-522 (what would be termed the Yes on 522 campaign), not the specific Yes on I-522 political committee. Contributions were given to support that general campaign effort and not for specific, identified uses. Indeed, FDA's more general use of the term "Yes on 522" as related to supporting the overall effort to pass I-522 rather than giving contributions to the specific Yes on I-522 political committee is made clear in the Exhibit attached to the 45-day notice letter. See Exhibit A ("...the race to win Yes on 522 to label GMOs is getting too close to call!"; "Join us to say Yes on 522"; donations "will go to the YES on I-522 campaign" – i.e., clarifying donations would support the Washington effort as opposed to FDA's other efforts). FDA asked for donations to the general Yes on 522 effort, and decided that the best use of those donations was making contributions to the Yes on I-522 political committee. If FDA decided there was a better use for those contributions in support of the general Yes on 522 effort, for example by making an independent expenditure, it could have done so. Thus, earmarking did not take place.

Thank you for your consideration, and please let us know what, if any, additional information you may require to complete your review of this matter.

Sincerely,

PACIFICA LAW GROUP LLP



Gregory J. Wong

Enclosure(s)

⁴ PDC Political Committee Campaign Disclosure Instructions (June 2013), p. 24, available at <http://www.pdc.wa.gov/archive/filerassistance/manuals/pdf/2013/2013.Man.Comm.pdf>.

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Public Disclosure Commission

EXHIBIT 1

YES ON I-522 COMM - 2013 - contributions - Thursday, November 07, 2013

Name	Date	Amount	P/G	Employer	Occupation
FOGGITT DANIE	2013-10-03	\$100.00	N		
FOISY MAURICE	2013-10-23	\$30.00	N		
FOK AGNES	2013-09-11	\$50.00	N		RECEIVED
FOK AGNES	2013-09-24	\$25.00	N		NOV 1 2013
FOK AGNES	2013-10-30	\$10.00	N		
FOLEY PATTY	2013-07-18	\$50.00	N		Public Disclosure Commission
FONTAINE ASHLEY	2013-11-04	\$25.00	N		
FONTAINE ASHLEY	2013-09-30	\$15.00	N		
FOOD AND WATER WATCH	2013-07-15	\$10,000.00	N		
FOOD AND WATER WATCH	2013-10-28	\$5,000.00	N		
FOOD DEMOCRACY ACTION! YES ON I-522 COMMITTEE TO LABEL GMOS IN WASHINGTON	2013-10-24	\$50,000.00	N		
FOOD DEMOCRACY ACTION! YES ON I-522 COMMITTEE TO LABEL GMOS IN WASHINGTON	2013-08-16	\$50,000.00	N		
FOOD DEMOCRACY ACTION! YES ON I-522 COMMITTEE TO LABEL GMOS IN WASHINGTON	2013-10-15	\$50,000.00	N		

YES ON I-522 COMM - 2013 - contributions - Thursday, November 07, 2013

Name	Date	Amount	P/G	Employer	Occupation
FOOD DEMOCRACY ACTION! YES ON I-522 COMMITTEE TO LABEL GMOS IN WASHINGTON	2013-10-25	\$25,000.00	N		
FOOD DEMOCRACY ACTION! YES ON I-522 COMMITTEE TO LABEL GMOS IN WASHINGTON	2013-10-30	\$25,000.00	N		RECEIVED NOV 14 2013
FOODS NUT-TRITIOUS	2013-10-31	\$50.00	N		Public Disclosure Commission
FOODSTATE INC	2013-08-29	\$1,000.00	N		
FOOTE CHARLES	2013-10-17	\$50.00	N		
FORAKER JOHN	2013-07-18	\$2,500.00	N	ANNIE'S, INC	CEO
FORAKER JOHN	2013-10-01	\$2,500.00	N	ANNIE'S, INC	CEO
FORBES DONNALEE	2013-09-30	\$5.22	N		
FORD EMMA	2013-10-15	\$50.00	N		
FORD EMMA	2013-09-10	\$25.00	N		
FORD EMMA	2013-11-05	\$5.22	N	SCHLUMBERGER	COMPLIANCE MANAGER
FORD MARY	2013-08-20	\$94.00	N		
FORD MICHAEL C.	2013-09-17	\$75.00	N		
FORD RICHARD	2013-10-18	\$5.22	N		



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Gregory J. Wong
greg.wong@pacificallawgroup.com

November 8, 2013

VIA E-MAIL & U.S. MAIL

Mr. Kurt Young
State of Washington Public Disclosure Commission
711 Capitol Way Rm. 206, PO Box 40908
Olympia, WA 98504-0908

Re: PDC Case No. T14-053 – Organic Consumers Fund

Dear Mr. Young:

This letter follows up on our telephone conversation and emails regarding the above case. As you know, we represent the Organic Consumers Fund (“OCF”), the Organic Consumers Fund Committee to Label GMOs in Washington State (“OCF Washington PAC”), and the Organic Consumers Association (“OCA”), three of the named entities in the 45-day letter that began the above case.

The main allegations in the 45-day letter are unfounded. The 45-day letter’s attempt to compare the facts here with the legal action the Attorney General is taking against the Grocery Manufacturers Association (“GMA”) for failing to form a Washington State political committee and disclose its donors is without merit. OCF properly formed a Washington State political committee to support I-522: the OCF Washington PAC.¹ And every individual contribution to the OCF Washington PAC has been reported and is available for the public to review.² Thus, unlike the GMA, OCF fulfilled the essential purpose of the public disclosure laws – transparency in who is giving to support political efforts in Washington State.

While the 45-day letter contains several vague and conclusory allegations, we will attempt to address the main complaints as we understand them.

¹ See Exhibit A – OCF Washington PAC C1pc form.

² See Exhibit B – PDC report reflecting donations to the OCF Washington PAC.

20091 00001 ck071b04q2.002

OCF Reported All Contributions Properly Through a Washington State Political Committee

Every contribution that OCF received or gave in support of I-522 properly went through the OCF Washington PAC. When I-522 qualified for the ballot, OCF decided it would like to support the effort to pass I-522. As required, OCF formed a Washington State political committee.³ Thereafter, every contribution that OCF solicited or received to support passage of I-522 was sent to the OCF Washington PAC and each individual contributor reported on the appropriate PDC forms. The OCF Washington PAC's PDC contributor report, 456 pages long in the downloaded PDF format, clearly reflects that individual contributors and the amount contributed were fully disclosed.⁴ The 45-day letter's allegations that OCF did not form a Washington political committee and did not identify individual contributors are completely unfounded.

To clarify, OCA and OCF are related but separate legal entities. OCA is registered with the IRS as a 501(c)(3) organization. OCF is a registered with the IRS as a 501(c)(4) organization. Importantly, OCA did not receive contributions or make expenditures related to the OCF Washington PAC, the Yes on I-522 political committee, or in any other way connected to I-522.⁵

OCA was not required to report any activity because it is not a political committee. "Political committee" means any person (except a candidate or an individual dealing with his or her own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition." RCW 42.17A.005 (37). Thus, there are two prongs to this definition – the "receiving contributions" prong and the "making expenditures" prong. *State ex rel. Evergreen Freedom Found. v. Washington Educ. Ass'n*, 111 Wn. App. 586, 598, 49 P.3d 894 (2002).

OCA is not a political committee under the first prong because it had no expectation of receiving, and does not accept, contributions in support of or opposition to candidates or ballot measures. In the event a member of the public offers such a contribution, it is respectfully declined and the prospective donor is directed to OCF. Donations to OCA are accepted for the organization's account for its own non-political purposes, and not set aside or earmarked for any electoral purpose.

An organization is not a political committee under the "receiving" prong unless "the members are called upon to make payments that are segregated for political purposes and the members know, or reasonably should know, of this political use." *Washington Educ. Ass'n*, 111 Wn. App. at 602 (citing 1973 Letter Op. Att'y Gen. No. 114, at 4). Such is not the case here. While OCA's newsletter mentioned proposed legislation in Washington State regarding labeling of genetically-engineered foods, the links provided make it clear that any contributions to the legislative efforts would go to OCF. Indeed, in the highlighted portion of the newsletter attached

³ See Exhibit A.

⁴ See Exhibit B.

⁵ See Exhibit C – PDC report of donors to the Yes on I-522 political committee dated November 7, 2013, on which OCA does not appear.

to the 45-day letter (Exhibit I), the text makes clear that any contributions to OCA would go to “support [OCA’s] work on behalf of organic standards, fair trade and public education” and if one wanted to support “legislative efforts in Washington” they should donate to OCF and provided a link. Simply providing links to other websites, either OCF’s donation page or the Yes on I-522 political committee, is not activity that converts OCA into a political committee under the “receiving” prong.

In order to be considered a political committee under the second prong, “[t]he organization making expenditures must have as its ‘primary or one of the primary purposes ... to affect, directly or indirectly, governmental decision making by supporting or opposing candidates or ballot propositions....’” *Washington Educ. Ass’n*, 111 Wn. App. at 599 (quoting *State v. Dan J. Evans Campaign Comm.*, 86 Wn.2d 503, 509, 546 P.2d 75 (1976)). Under this now well-established test, OCA is not a political committee because making expenditures in favor of ballot measures is not its primary purpose, or even one of its purposes at all.⁶ To the extent OCA employees provided staff services to OCF, those services were listed as expenses and reimbursed at fair market value.

The Remaining Allegations Lack Merit

The 45-day letter contains a number of other allegations that are unfounded. First, the vague suggestion that anonymous contributions occurred is not supported by any evidence. Indeed, such a claim is contradicted by the lengthy list of individual contributors the OCF Washington PAC reported.

Second, OCF and the OCF Washington PAC did not coordinate with the Yes on I-522 political committee. The suggestion that it did so, once again not supported by evidence, is without merit.

Third, the suggestion that contributions from foreign nationals violated federal law is incorrect. Under federal law, foreign nationals are prohibited from donating to candidates, but may donate to ballot issues. The Federal Elections Commission has provided guidance on this exact issue: “The Commission has stated that contributions or expenditures relating only or exclusively to ballot referenda issues, and not to elections to any political office, do not fall within the purview of the Act.”⁷ Thus, the “Commission [has] concluded that although foreign nationals could make disbursements solely to influence ballot issues, a foreign national could not contribute to a ballot committee that had coordinated its efforts with a nonfederal candidate’s re-election campaign.”⁸

⁶ It appears that four contributions from OCF to the OCF Washington PAC were inadvertently labeled as coming from OCA rather than OCF. This was a clerical mistake, as those contributions came from OCF accounts, not OCA accounts. Those four contributions came from OCF’s general fund and were not the result of efforts specific to I-522. Amended reports reflecting this correction will be filed shortly.

⁷ Federal Elections Commission Advisory Opinion 1989-32, *available at* <http://saos.nictusa.com/aodocs/1989-32.pdf>.

⁸ Federal Elections Commission – Foreign Nationals Brochure, *available at* <http://www.fec.gov/pages/brochures/foreign.shtml> (emphasis added).

Mr. Kurt Young
November 8, 2013
Page 4

I-522 was a ballot issue only, not connected with any candidate for office. The donations from foreign nationals do not violate federal law.

Fourth, the reference to separate donations in support of I-522 by Dr. Bronner's Magic Soaps and Mercola.com is a red herring. While referred to as "matching" grants from an "anonymous donor", in fact no money was given to OCF, the OCF Washington PAC or OCA by Dr. Bronner's or Mercola.com. Rather, Dr. Bronner's and Mercola.com separately gave donations in the "matching" amounts to their efforts in support of I-522. OCF, the OCF Washington PAC and OCA did not, and were not required to, report those amounts because they never received the contributions.⁹

Fifth, the email supplement to the 45-day letter alleges, without evidence, a concern with earmarked contributions. But no earmarking occurred. The PDC's Political Committee Manual explains that earmarked contributions are given to one committee "for spending on behalf of one or more other candidates or committees."¹⁰ Here, OCF solicited contributions to benefit the general effort to pass I-522 (what would be termed the Yes on 522 campaign), not the specific Yes on I-522 political committee. Contributions were given to support that general campaign effort and not for specific, identified uses. Indeed, OCF's more general use of the term "Yes on 522" as related to supporting the overall effort to pass I-522 rather than giving contributions to the specific Yes on I-522 political committee is made clear in the Exhibits attached to the 45-day notice letter. *See, e.g.*, Exhibit B ("Yes on 522: The People's Right to Know Genetically Engineered Food Act"; "Let's vote for the right to know what's in our food. Yes on 522!"); Exhibit C (donations to support "legislative efforts in Washington" are made to OCF); Exhibit E (donations to OCF "will go directly to the YES on I-522 campaign", as opposed to efforts in other states or nationwide). OCF asked for donations to the general Yes on 522 effort, and decided that the best use of those donations was making contributions to the Yes on I-522 political committee. If OCF decided there was a better use for those contributions in support of the general Yes on 522 effort, for example by making an independent expenditure, it could have done so. Thus, earmarking did not take place.

Finally, OCF admits that its October 17, 2013, contribution was reported a few days late. The reason for this was because of coordination issues between OCF and the accountant hired to prepare the reports. Further, OCF admits that it did not open a Washington bank account or have a separate account for the OCF Washington PAC. This was an unintentional technical oversight. OCF has nothing to hide in this regard.

⁹ Exhibit R to the 45-day letter contains a few inadvertent errors, including mistakenly referring to OCA rather than OCF and referring to the Label It WA campaign committee rather than the OCF Washington PAC and Yes on 522. Once again, no contributions went to OCA and all contributions to OCF were properly reported through the OCF Washington PAC.

¹⁰ PDC Political Committee Campaign Disclosure Instructions (June 2013), p. 24, *available at* <http://www.pdc.wa.gov/archive/filerassistance/manuals/pdf/2013/2013.Man.Comm.pdf>.

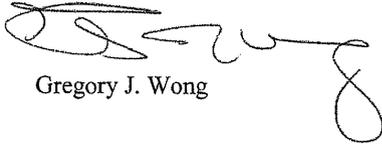
Mr. Kurt Young
November 8, 2013
Page 5

OCF, the OCF Washington PAC, and OCA are committed to compliance with Washington's public disclosure laws. They understand the importance of transparency in electoral politics. Their efforts fully reflect that commitment to compliance with the laws and to the importance of transparency.

Thank you for your consideration, and please let us know what, if any, additional information you may require to complete your review of this matter.

Sincerely,

PACIFICA LAW GROUP LLP

A handwritten signature in black ink, appearing to read "Gregory J. Wong", with a large, stylized flourish at the end.

Enclosure(s)

20091 00001 ck071b04q2.002

Kurt Young

From: "Michael—522parents.org" [michael@522parents.org]
Sent: Monday, November 04, 2013 12:55 PM
To: Kurt Young
Cc: Jacob Berkey
Subject: Re: Webiste supporting I-522 (522Parents.org)

Dear Mr. Young (cc Mr Berkey):

To answer your questions (below), Maris and I created 522parents.org on April 9, 2013. We felt it was necessary to advocate as parents for I-522 because we have a small child and believe that parents and consumers should have a basic right to differentiate among the variety of food types available to them, regardless of their individual reasons.

The web site was a joint effort between Maris and me. We worked together to develop the content, and immediately became clear to us that a list of known side-effects was useful to people to counter the false claims that the industry and "no" spokespeople are repeating ad nauseam.

Regarding costs, there were no significant expenses involved, and they came entirely from our own pockets. We purchased the domain names for 522parents.org and 522parents.com (about \$10 each); we prepared a small flyer to promote our site (about \$50); and we spent our time working on it with no one else involved. There are no unique web hosting fees because I host many other domain names for my work.

We did not coordinate our website activities with the "Yes" campaign in any way. We simply provided links to the initiative campaign at the time (they actually need updating). Our website never solicited nor accepted any contributions on behalf of the Yes on I-522 Committee, nor did the site solicit or accept any contributions at any time. In sum, there were essentially no costs other than the domain name and a flyer, plus the value of our time.

You are welcome to contact us again at 212.727.9922, or correspond with us via email at:

Michael Kovalenko (michael@522parents.org) Maris Abelson (maris@522parents.org)

Sincerely,

Michael Kovalenko and Maris Abelson

Kurt Young

From: Tony Perkins
Sent: Friday, November 01, 2013 4:48 PM
To: maggie_maher@yahoo.com
Cc: Kurt Young; Jacob Berkey
Subject: PDC Complaint Regarding volunteersfori522.org
Attachments: Volunteers for I-522.pdf

Dear Maggie,

This email is a follow-up to a voice message I left for you a moment ago regarding the complaint filed on October 25, 2013 against supporters of I-522. The Web site *volunteersfori522.org* was named in the complaint, and on October 30, 2013 PDC staff directed a notification to Florence Vincent, an Olympia contact listed on the Web site. In a telephone conversation with me yesterday, October 31, 2013, you indicated that *volunteersfori522.org* is your own creation, and is sponsored with your personal funds. Accordingly, I am providing a copy of our October 30, 2013 notification to you with this email.

In our conversation yesterday, you stated that you sponsored *volunteersfori522.org* as an individual dealing with your own funds or property. You stated that you have no expectation of receiving contributions to support or oppose a candidate or ballot proposition. Although the *volunteersfori522.org* Web site links to other sites that promote I-522, you stated that you did not sponsor your site in consultation with any political committee. You stated that you purchased eight web domain names and had them all direct back to *volunteersfori522.org*. You stated that including the 8 domain names and web hosting fees for *volunteersfori522.org*, it cost you approximately \$130 to sponsor the Web site.

Based on the information you provided, it appears you were required to file a C-6 Report of Independent Expenditures with the PDC to disclose your sponsorship of *volunteersfori522.org*. Per RCW 42.17A.255, an "independent expenditure" is any expenditure that is made in support of or in opposition to any candidate or ballot proposition, and is not otherwise required to be reported under the laws that apply to political committees. Sponsors of independent expenditures are required to file a C-6 report with the PDC within five days of making expenditures of \$100 or more to independently support or oppose a candidate or ballot proposition. As soon as possible, please use the link above to access reporting materials and file the required C-6 report. While you are welcome to send an advance copy of your filing by email, the report will be considered as filed of the date it is postmarked through the mail.

In addition, per RCW 42.17A.320 and WAC 390-18-030, *volunteersfori522.org* was required to display a statement identifying you as its sponsor. The statement was required to take the form "Paid for by" followed by your name and mailing address. (An email or Web address is not sufficient.) As soon as possible, please modify *volunteersfori522.org* so that the site contains the required statement of sponsor identification.

When you have taken the steps discussed above, please contact me by telephone or email to let me know. If you have any questions, please feel free to give me a call. Thanks for your attention to this.

Sincerely,

Tony Perkins

Lead Political Finance Specialist
Washington State Public Disclosure Commission

☎ (360) 586-1042

☎ (360) 753-1112

✉ tony.perkins@pdc.wa.gov

PDC Staff Telephone Record

Tony Perkins

Date: 10/31/2013 11:43AM

Duration: 0.18

Subject: Complaint by No on I-522

From: TPERKINS

To: Maggie Willson

Returned: N

Status: Follow up

Contact: 503-329-1722

She runs volunteersfori522.org. She received a copy of the complaint second-hand, and wanted to know if there are allegations she needs to respond to, or reports she needs to file. I said I would review the complaint and see whether it contained allegations regarding her web site, and get back to her ASAP.

Maggie said she purchased 8 web domain names and had them all direct back to volunteersfori522.org. Including the web hosting fees for the site and the 8 domain names, volunteersfori522.org cost her approximately \$130.

She said that she meets regularly with a small discussion group to coordinate activity in support of I-522, but they are not responsible for volunteersfori522.org. She said that the Web site is her own creation, and was sponsored with her personal funds. She said that her web site links to other web sites that promote I-522, but she did not sponsor the site in consultation with any political committee.

I explained the definition of "political committee." She said she is an individual dealing with her own funds or property, and has no expectation of receiving contributions.



Reporting Form for: (check one)

Instructions on Page 3

- INDEPENDENT EXPENDITURES** (Occurring at any time) — \$100 or more
- INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — \$1,000 or more
- ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — \$1,000 or more

1. Name and complete postal mailing address of sponsor:

MARGARET M. WILLSON
 PO Box 77596
 Seattle, WA 98177-0596

E-mail: MAGGIE_MAHER@YAHOO.COM
 Telephone: 503 329-1722

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (* See Below)
SEE ATTACHMENT				

Expenditures \$100 or less not itemized above \$294.07

Total this report \$1453.05

Amount or Value
 *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed

Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.
 \$ 1453.05

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Proposition	I-522		<input checked="" type="checkbox"/> <input type="checkbox"/>	\$ 1453.05	\$ 1453.05
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
Continued on attached sheet <input type="checkbox"/>				\$	\$

Filer Name: MARGARET M. WILSON

NOV - 5 2013

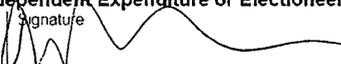
4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:

- a) An individual using only personal funds.
- b) An individual using personal funds and/or funds received from others.
- c) A business, union, group, association, organization, or other person using only general treasury funds.
- d) A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) A political committee filing C-5 reports. (RCW 42.17A.250)
- g) Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$
		TOTAL FUNDS RECEIVED	\$

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature 
	Printed Name MARGARET M. WILSON
	Street address PO Box 77596
	City/State/Zip Seattle, WA 98177-0596
	Date Signed 11/4/2013
*RCW9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	

1	2	3	4	5
1	Margaret M. Wilson			
2	Independent Expenditures for I-522			
3	Form O6, #2			
4	November 4, 2013			
5				
6	Date Made	Date First	Name and Address of Vendor or Recipient	Description of Expenditure
7		Presented/Mailed		
8				
9				
10	5/16/2013	5/20/2013	GoDaddy, 14455 N. Hayden Rd., #219, Scottsdale, AZ 85260	buy domain names/seo/web hosting for
11	8/28/2013	8/29/2013	Costco Business Center, 19105 Washington 99, Lynnwood, WA 98036	volunteersfori522.org/com/info/net and
12	8/28/2013	9/3/2013	Buldiasign, 11525A Stonehollow Dr., Suite 100, Austin, TX 78756	print flyers and bumper stickers
13	8/29/2013	9/7/2013	Yes! Books, 502 W. Merrill Ave., Fairfield, IA 52556	print bumper stickers
14	9/3/2013	not used	Yes! Books, 502 W. Merrill Ave., Fairfield, IA 52556	gmo education pamphlets and CDs
15				\$101.19
16				\$277.81
17				\$482.98
18	Accumulated Expenditures under \$100			\$127.00
19				\$170.00
20				\$1,158.98
21	Total Expenditures			\$294.07
				\$1,453.05

DATE FILED PDC
NOV - 5 2013

RECEIVED

RECEIVED
DEC

DEC - 9 2013
Public Disclosure

Public Disclosure Commission

SANDLER, REIFF, YOUNG & LAMB, P.C

December 9, 2013

Via E-Mail

Phillip E. Stutzman
Director of Compliance
Public Disclosure Commission
711 Capitol Way Room 206
Olympia, WA 98504-0908

Re: Notice of Complaint from Robert Maguire, T14-053

Dear Mr. Stutzman:

Our client, All One God Faith, Inc., d/b/a Dr. Bronner's Magic Soaps, has asked us to respond to your letter of October 30, 2013, regarding the above-referenced complaint.

In response to your questions:

- (1) The subject advertisement ran in Mother Jones magazine in mid-October, 2013.
- (2) The advertisement cost \$4,900.
- (3) The cost has been communicated to the I-522 Committee as an in-kind contribution.

If you need any additional information or have any questions, please do not hesitate to contact me. Thank you for your time and attention to this matter.

Sincerely yours,



Joseph E. Sandler

1025 VERMONT AVE., N.W., SUITE 300, WASHINGTON, DC 20005 • TEL: (202) 479-1111 • FAX: (202)479-1115