

**TEXT FOR PDC VIOLATION FORM (I tried to submit this the third time on 2/28/19)**

**Your email address:** [jcarolmartin@gmail.com](mailto:jcarolmartin@gmail.com)

**Your name:** Jeanne Carol Martin

**I would like to:** File a formal complaint

**Legal name (required to file a complaint):** Jeanne Carol Martin

**Telephone number:** 360-277-3764

**U.S. mail address:** PO Box 116, Seabeck, WA 98380

**Respondent name. (The person's against whom the complaint is filed):** Our Olympic Communities Enterprise Washington

**Sections of law violated:**

1) The PDC requires that the top five contributors must be printed on political advertising disclaimers. The flyers in question mailed by Our Olympic Communities Enterprise Washington list only two contributors 2) Making a false statement of material fact about a candidate on political advertising.

**What impact does the alleged violation(s) have on the public?**

- 1) Our Olympic Communities Enterprise Washington harmed the hundreds of **public volunteers** who worked to get Washington State 35<sup>th</sup> LD candidate, Irene Bowling, elected. It felt as though all of our efforts were for nothing because, despite hundreds of hours of doorbelling and working to give Irene's message to local voters through a variety of legal grassroots methods, OOCEW undid all of our work with exaggerations and false implications contained in expensive negative flyers mailed to voters shortly before the November 6<sup>th</sup>, 2018 election. Had I (and other volunteers) known that a rich PAC would bombard voters with false information right before the election, I would have chosen to spend my time in other ways.
- 2) OOCEW's flyers also harmed **the candidate (a member of the public)** by making claims that she "PLEDGED to vote straight down the party line in the legislature," (see attachments below for photos of these flyers) leading voters to believe that Irene would not represent them but would only work to represent party interests. This was not true. Irene has told me she did not say this, and never would.

Multiple flyers from OOCEW arrived in voter's mailboxes within days of the November 6, 2018 deadline to mail in ballots. Irene Bowling did not have time to counter the implied untruths in the flyers (and probably would not have had access to the large amount of money needed to do so at this late date in her campaign). OOCEW's flyers probably cost Irene the election - very obvious harm to a member of the

public. Therefore, she wasted hundreds (or thousands) of hours of time; money; and effort doorbelling, etc... for her campaign.

- 3) And, **the public was harmed** by being given fictitious information concerning candidate Irene Bowling shortly before ballots were due. Irene did not have time to reach all the voters who had been mailed flyers to correct the misinformation. Therefore, voters may have voted based on fictitious information, and may have voted for a candidate who they would not have otherwise.

**List of *attached* evidence or contact information where evidence may be found:**

A footnote (almost impossible to read without a magnifying glass) followed OOCEW's statement in one its flyers saying that Irene "pledged to vote straight down the party line in the legislature, meaning higher taxes and spending that we can't afford." The footnote referenced a document that was a QUESTIONNAIRE, not a contract that involved any kind of pledge or promise. The entire statement about a pledge was fictional.

- 1) The document referenced by the footnote can be viewed at: [https://waprogressives.org/wp-content/uploads/2018/09/Irene Bowling Caucus Questionnaire 2018.pdf](https://waprogressives.org/wp-content/uploads/2018/09/Irene%20Bowling%20Caucus%20Questionnaire%202018.pdf). (If this site does not take you directly to Irene Bowling's questionnaire, you may have to enter *Irene Bowling* in the search box, then select the *questionnaire for Irene Bowling*)

- 2) Photos of flyers mailed by OOCEW sent as attachments to this ticket:

IMG\_2859.JPG is a photo of a large one-page mailer (not folded) that has the disclaimer printed upside-down on the bottom of the address side of the flyer making it less noticeable, and also discouraging recipients from reading it.

IMG\_2850.JPG is a photo from a flyer with text stating that Irene PLEDGED to vote straight down the party line. This is a fictitious statement supported by a footnote that references a questionnaire, not a pledge or promise of any kind.

IMG\_2849 is a photo of the standard disclaimer text used by OOCEW that only lists two contributors, not five. The contributors listed are also PACs. If less than five PACs donated to OOCEW, then why weren't the top contributors to the donating PACs listed, to bring the total donors to the required five?

Some of the flyers received had disclaimers that were printed in a very light, small text, making them extremely difficult to read.

I could attach many more photos, but the last time I tried to submit this form, it did not go through to your office. I think it may have contained too many attachments. Please let me know if I you would like me to send more photos.

You will be able to see details on the flyers that don't appear to be within PDC regulations. None of the different flyers mailed listed the top five contributors.

#### **LIST OF POTENTIAL WITNESSES WITH CONTACT INFORMATION TO REACH THEM:**

If you would like a list of the many, many people who volunteered hundreds of hours for Irene's campaign, please let me know. I would need to get these volunteers' permission to release their names and contact information to the PDC.

I will also be happy to supply the PDC with the names of citizens I know who received OOCEW's intentionally misleading flyers in the mail. I can't give you a list of everyone these flyers were mailed to - only OOCEW could do that.

*(I checked yes on the following statement): I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.*

#### **DESCRIPTION: (this section is supposed to clarify that "this complaint is true and correct to the best of my knowledge and belief")**

**I'm sure it is obvious that I am not a lawyer. I have done my best to interpret PDC rules when making this formal complaint.**

Our Olympic Communities Enterprise Washington mailed out a large quantity of flyers asking people NOT to vote for Irene Bowling for Senate for the 35th LD and presenting material in their flyers that was not strictly truthful (that directly or indirectly implied something that was not true - possibly fitting the description of false political advertising).

Multiple flyers from OOCEW arrived in voter's mailboxes within days of the November 6, 2018 deadline to mail in ballots. Irene Bowling did not have time to counter the implied untruths in the flyers (and probably would not have had access to the large amount of money needed to do so at this late date in her campaign).

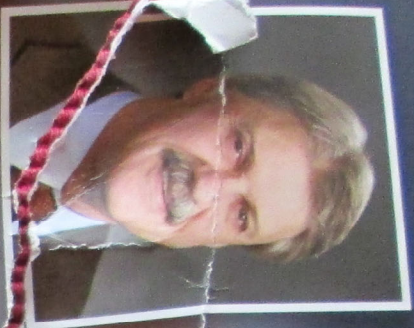
The flyers themselves did not appear to follow all PDC rules for political advertising.

I believe that the Independent Expenditure political advertising that was sent as mailed flyers to voters in the 35th Legislative District of Washington State by Our Olympic Communities Enterprise Washington violates the spirit (if not, the letter) of the Public Disclosure Commission's rules. With this kind of negative advertising impacting voters, it is no wonder that the general public feels discouraged to actively

participate in efforts to support candidates. Good new candidates for office will also be discouraged knowing that they can never compete with the enormous sums of money that PACs have access to.

I was dismayed to find that Our Olympic Communities Enterprise Washington was not a grassroots *community* organization, as its name is probably intended to imply. Instead it is a wealthy PAC representing many small to large businesses in Washington state, that is in turn supported by a very few, even wealthier, PACs. The average citizen does not have the time to follow the money behind the plethora of political advertising they receive in the mail shortly before elections. Therefore, I think it is vitally important that PDC rules are rigorously enforced.





# TIM SHELDON

## WON'T STOP FIGHTING FOR WHAT'S RIGHT.

It's time to give back to those who  
gave everything for us.

It's time to stand up for our veterans.



**Tim Sheldon (D)**  
for State Senate  
★ — ★ — ★  
**Vote by Tuesday,  
November 6<sup>th</sup>**

No candidate authorized this ad. Paid for by Our  
Olympic Communities Enterprise Washington.  
Top 5 Contributors: Enterprise WA's Jobs PAC and  
Washington Hospitality Assoc PAC  
1603 116<sup>th</sup> Ave NE Suite 120  
Bellevue, WA 98004

\*\*\*\*\*ECRLOT\*\*B001 P-1 P151

The Martin Household  
Or Current Resident  
PO Box 116  
Seabeck WA 98380-0116



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PPSRT STD  
U.S. POSTAGE  
PAID  
PSP



She's pledged to vote straight down the party line in the legislature, meaning higher taxes and spending that we can't afford.<sup>1</sup>

This has earned her the strong support of Seattle establishment liberals and the State Democratic Party.<sup>2</sup>

This means more support for the Democrats in the legislature as she puts her party first, not the district she represents.

Irene Bowling will work for the Seattle establishment liberals and leave us in the gutter.



Paid for by Our Olympic Communities Enterprise  
Washington. No candidate authorized this ad.  
Top 5 Contributors: Enterprise WA's Jobs PAC and  
Washington Hospitality Assoc PAC.

1603 116th Ave NE Suite 120  
Bellevue, WA 98004

Presorted  
Standard  
U.S. Postage  
**PAID**  
RR Donnelley