

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

<input type="checkbox"/> EXPEDITE <input type="checkbox"/> No hearing set <input type="checkbox"/> Hearing is set Date: _____ Time: _____ Judge/Calendar: _____ _____

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THURSTON COUNTY

MOMS FOR LABELING, in the name of the)
State of Washington,)
))
Plaintiff,)
))
vs.)
))
NO ON 522,)
))
Defendant.)

Related case note: This complaint is affiliated with *Moms for Labeling v. No on 522*, no. 13-2-0960-1 and *State of Washington v. Grocery Manufacturers Association*, no. 13-2-01256-8, both before Judge Wickham

No.
COMPLAINT

Plaintiff, by and through its attorneys of record, hereby files this Complaint, making the allegations herein upon personal knowledge as to itself and its own acts, and upon information and belief based on investigation of counsel as to all other matters, as set forth herein.

I. INTRODUCTION

This complaint constitutes a citizen action under RCW 42.17A.765(4).

For more than a month, the No on Initiative 522 Campaign (“No on 522 Campaign”) has been operating a statewide advertising campaign that illegally conceals the identity of the

1 campaign's donors. Donations to the No on 522 Campaign have being laundered through the
2 Grocery Manufacturers Association ("GMA"), the world's largest association of food,
3 beverage, and consumer product companies.

4 From the beginning of its advertising campaign and through the date of this filing, the
5 No on 522 Campaign's advertisements falsely label the GMA as one of its "top five
6 contributors." See, e.g., *Exhibit A*. In fact, the GMA did not contribute the 7.2 million
7 dollars that supposedly make it a top five contributor. Rather, the GMA acted as an illegal
8 conduit by soliciting and collecting contributions from members that were earmarked for the
9 effort to defeat Initiative 522. The GMA then falsely claimed to have made these
10 contributions.

11 On August 23, 2013, Moms for Labeling notified the Attorney General of the State of
12 Washington ("AG") and the Thurston County Prosecutor that it had reason to believe that the
13 GMA and No on 522 Campaign were violating the campaign laws based upon these actions.
14 It provided the AG with additional evidence when requested. Then, when no action had been
15 taken after 45 days, Moms for Labeling provided the 10-day notice letter required under
16 RCW 42.17A.765(4).

17 Acting upon Moms for Labeling's notices, the AG brought suit against the GMA on
18 October 16, 2013, based upon the GMA's scheme to illegal conceal the donors to the No on
19 522 Campaign. The State's complaint quoted evidence obtained by the State that clearly
20 proves the illegal concealment alleged by Moms for Labeling. In response to the AG's
21 complaint, the GMA registered a new political committee and reported some of its illegal
22 receipts and distribution of political contributions as if carried out by this committee.

23 As of the date of this filing, the 55 day statutory notice period has expired and the
24 State has not instituted an enforcement action against the No on 522 Campaign, thereby
25
26

1 allowing Moms for Labeling to file this “citizen against” the No on 522 Campaign in the
2 name of the State of Washington.

3 In summary, this citizen action makes the following claims and seeks the following
4 relief:

5 • The No on 522 Campaign has been distributing false and misleading
6 disclosures of its top five contributors, with actual or imputed knowledge that its disclosures
7 were false and illegal.

8 • Since the AG filed his case against the GMA, the No on 522 Campaign has
9 refused to modify its “top five contributor” disclosures. As of the date of this filing, those
10 disclosures continue to conceal the true identities of the No on 522 Campaign’s contributors,
11 causing significant harm to voters and the public interest.

12 • Immediate judicial action is necessary to require the No on 522 Campaign to
13 correct its disclosures to reflect the campaign’s actual top five contributors and to include
14 “corrective disclosures” to remedy past false information distributed to voters.

15 • State law prohibits the No on 522 Campaign from accepting any further funds
16 from the GMA or its newly created political committee, which could constitute illicit
17 contributions made through a conduit so as to have the affect of concealment. RCW
18 42.17A.715.

19 • In addition, the No on 522 Campaign must pay a penalty for its violations of
20 RCW chapter 42.17A. The presumptive penalty is the amount of wrongfully concealed
21 contributions, which exceeds \$7 million. The No on 522 Campaign has only approximately
22 half of that amount remaining in assets and is expected to spend down all of these assets by
23 the end of the campaign. The Court must sequester the amount of illegal funds remaining in
24 the No on 522 Campaign’s accounts to allow for payment of future penalties.

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

II. PARTIES AND STANDING

1. Plaintiff Moms for Labeling is a Washington not-for-profit corporation. Its members are Washington voters and mothers who are harmed by the concealment of the true donors of the No on 522 Campaign. They seek transparency in the food they feed their families and in this campaign. Moms for Labeling gave the required 45 day notice and 10 day notice prior to bringing this suit as required by RCW 42.17A.765(4).

2. The No on 522 Campaign is a Washington state political committee.

III. JURISDICTION AND VENUE

3. This court has jurisdiction by virtue of RCW 42.17A.765(4).

4. Venue properly lies in this court by virtue of RCW 4.92.010(1).

IV. STATEMENT OF FACTS

A. THE GROCERY MANUFACTURERS ASSOCIATION HAS BEEN USED TO ILLEGALLY CONCEAL CONTRIBUTIONS TO THE NO ON 522 CAMPAIGN

5. The Grocery Manufacturers Association (“GMA”) made a special appeal to its membersto fund the No on 522 Campaign through a voluntary special assessment. The GMA devised this method of fundraising for the No on 522 Campaign as a means to raise necessary funds “while better shielding individual companies from attack for providing funding.”

6. The GMA has received pledges and contributions from certain members to support the No on 522 Campaign.

7. The GMA member companies giving to the special assessment understand that their contributions are being used to fund the No on 522 Campaign.

8. The GMA consolidated these contributions and then turned them over to the No on 522 Campaign.

1 9. The following allegations are contained in the complaint filed by the State of
2 Washington against the GMA, attached as *Exhibit B*, and these allegations are hereby
3 incorporated by reference as separate paragraphs to this Complaint:

4 6. On June 29, 2012, Chris and Leah McManus submitted Initiative 522 to
5 the Washington State Secretary of State. As identified by the Secretary of
6 State, Initiative 522 "would require most raw agricultural commodities,
7 processed foods, and seeds and seed stocks, if produced using genetic
8 engineering as defined, to be labeled as genetically engineered when offered for
9 retail sale."

10 7. The Secretary of State then forwarded Initiative 522 to the Washington
11 State Legislature pursuant to state law. Under state law, if the Legislature failed
12 to act on Initiative 522 by the end of the 2013 legislative session, Initiative
13 522 would be submitted to Washington voters in November 2013

14 8. The Legislature did not act on Initiative 522 within the time frames allotted
15 by statute. The matter is now set on the November 5, 2013 General Election
16 ballot.

17 Political Committees Supporting and Opposing Initiative 522

18 9. There are currently eight political committees registered with the PDC to
19 support or oppose Initiative 522, seven supporting and one opposing.

20 10. The seven committees supporting Initiative 522 registered with the PDC on
21 May 4, 2012 (Label It Now); August 6, 2012 (GMO Right to Know);
22 February 11, 2013 (Yes on 522); February 20, 2013 (EWG Yes); March 20,
23 2013 (Organic Consumers Fund); June 19, 2013 (GMO Awareness); and
24 September 10, 2013 (Farmers & Friends).

25 11. Currently, the one political committee registered to oppose Initiative 522 is
26 No on 522, which registered with the PDC on January 15, 2013.

27 Grocery Manufacturers Association's Opposition to Mandatory Labeling

28 12. Following the 2012 defeat of a California ballot measure (Proposition 37)
29 which was similar in purpose to Initiative 522, GMA staff and its Board of
30 Directors ("GMA Board") began review and development of short-and long-term
31 strategies to oppose mandatory labeling on products containing genetically
32 engineered or modified organisms. GMA, its Board, and its members
33 determined that a "long-term, thoughtful, strategically flexible approach" to
34 product labeling issues was necessary at the local, state, and national levels.

1 13. In December 2012, following meetings of the GMA Government
2 Affairs Council and GMA Board, the GMA Board directed GMA staff to
3 conduct baseline polling in Washington State "to determine the viability of a
4 campaign to defeat I-522." The GMA Board also directed GMA staff to
5 "scope out a funding mechanism to address the GMO issue", "while better
6 shielding individual companies from attack for providing funding." At the same
7 time, the GMA Board directed GMA staff to prepare to oppose "efforts to
8 require mandatory GMO labels: a. Fight Washington State Ballot Measure" and
9 "begin preparations for a campaign, . . . to defeat I-522, the Washington State
10 Ballot measure."

11 14. In January 2013, GMA staff presented the GMA Board with options for
12 addressing "GMO Labeling Post Prop 37." The GMA Board discussion
13 included discussion of Initiative 522, an estimated cost for a campaign to defeat
14 Initiative 522, and consideration of GMA members' "appetite to mount a
15 campaign to defeat the Washington State Measure."

16 15. At its January 19, 2013 meeting, the GMA Board supported a
17 "multipronged" approach to mandatory labeling issues and directed GMA
18 staff to "oppose all state efforts" to impose mandatory labeling by engaging in
19 a state-by-state campaign.

20 16. Also at its January 19, 2013 meeting, the GMA Board expressed a
21 desire to plan for funding long-term GMA goals with "a preference for GMA
22 to be the funder of such efforts, rather than individual companies."

23 17. In a February 18, 2013 memorandum to the GMA Board, GMA's Chief
24 Executive Officer Pamela G. Bailey proposed a cost estimate for the multi-
25 pronged approach to labeling issues, which included the cost to "fight
26 Washington State Ballot Measure" in 2013. CEO Bailey also included in her
memorandum the establishment of a separate GMA fund that would "allow
for greater planning for the funds to combat current threats and better shield
individual companies from attack that provide funding for specific efforts." The
fund would allow GMA to be identified as the source of funding for efforts that
included defeating Initiative 522.

18. GMA named the fund the "Defense of Brand Strategic Account" ("Account")
and determined that it would be funded from an assessment to GMA
members separate from their normal association dues. The Account would be
segregated from other GMA funds. GMA expressed its intent that GMA's
opposition to a mandatory labeling program would be paid for from the
Account. GMA also originally set a three-year period for this program, running
from 2013 through 2015. GMA anticipated a number of different actions would

1 be taken regarding the mandatory labeling issue, including opposition to the
2 pending Initiative 522.

3 19. Following GMA Board approval in January and February 2013, GMA
4 staff sent invoices for the Account to GMA members in March and August
5 2013. Goals identified for the Account included to "defeat ballot measures"
6 and continue to "oppose all state measures."

7 20. GMA identified the portion of 2013 Account budget to be allotted to
8 oppose Initiative 522 as \$10,000,000.

9 21. On March 15, 2013, CEO Bailey sent a memorandum to GMA members
10 with the first Account invoice. In addition to a description of the purpose of
11 the Account, Ms. Bailey provided GMA members an "Update on Washington
12 State," which described GMA efforts to "assess the viability of a campaign to
13 defeat I-522" and the results of GMA's polling efforts. Ms. Bailey further
14 advised GMA members that "[m]uch like California, [the opposition to
15 Initiative 522] campaign will be challenging." She then promised to provide
16 updates to GMA members about "our progress on the Washington State
17 efforts."

18 22. The March Account invoice further described the amount GMA billed
19 its members as a "contribution" for its 2013 Defense of Brands Strategic
20 Account and was the first of two installments with a due date of April 15,
21 2013.

22 23. On May 8, 2013, the No on 522 political committee reported receiving a
23 contribution from GMA in the amount of \$472,500. GMA also informed its
24 membership that the \$472,500 contribution made to the No on 522 political
25 committee came from funds collected from GMA members for the Defense of
26 Brands Strategic Account.

27 24. On or about August 13, 2013, GMA sent the next invoice to GMA
28 members for the second installment to the 2013 Defense of Brands Strategic
29 Account, again labeling the installment as a contribution to the Account.

30 25. On or about August 23, 2013, GMA contributed \$1,750,000 to the No on
31 522 political committee from its Defense of Brands Strategic Account.

32 26. On or about September 27, 2013, GMA contributed \$5,000,000 to the No
33 on 522 political committee from its Defense of Brands Strategic Account.

34 27. All the funds used for GMA's contributions to the No on 522 political
35 committee came from its Defense of Brands Strategic Account.

1 28. As of October 7, 2013, GMA has accumulated \$13,480,500 from GMA
2 members contributions to the Account. Of that amount collected, GMA spent a
3 total of \$7,222,500 in contributions to the No on 522 political committee to
oppose Washington's Initiative 522.

4 **B. THE NO ON 522 CAMPAIGN FALSELY REPORTED THAT THE GMA**
5 **GAVE \$7.2 MILLION IN CONTRIBUTIONS.**

6 10. The No on 522 Campaign has reported \$7.2 million in contributions as if they
7 were made by the GMA, when in fact other corporations made these donations and the GMA
8 was merely used as a conduit to conceal the true identity of the donors.

9 11. As of the date of this filing, the No on 522 Campaign has not corrected its
10 reporting and continues to list the GMA as having given \$7.2 million.
11

12 **C. THE NO ON 522 CAMPAIGN'S ADVERTISEMENTS FALSELY LIST THE**
13 **GMA AS THE ORIGINATOR OF THESE CONTRIBUTIONS**

14 12. The No on 522 Campaign has embarked upon a multi-million dollar television
15 advertising campaign that falsely lists the GMA as one of the campaign's top five
16 contributors based upon the concealed contributions, as depicted in *Exhibit A* to this
17 Complaint.

18 13. As of the date of this filing, the No on 522 Campaign continues to list the
19 GMA as a top five contributor on advertisements airing on television and on YouTube,
20 including advertisements that began airing *after* the AG filed suit. For example, the No on
21 522 Campaign posted an advertisement on its YouTube channel on October 19, 2013, which
22 stated that the GMA was one of its top five contributors.

23 14. The No on 522 Campaign should never have listed the GMA as a top
24 contributor. The GMA was merely an illegal conduit for the contributions of other
25 corporations and, therefore, it never was a top five contributor. This continues to be true
26

1 even though the AG has forced the GMA to disclose the identity of contributors that the
2 GMA and No on 522 Campaign previously concealed.

3 15. As of the date of this filing, the top five contributors to the No on 522
4 Campaign are: Monsanto Company, Dupont Pioneer, PepsiCo, Inc., Nestle USA, Inc. and the
5 Coca Cola Company.

6 16. After being caught, the GMA registered a political committee under the name
7 “Grocery Manufacturers Association Against I-522” and reported a portion – but not all – of
8 its previous receipt and transfers of political contributions as if carried out by this committee.
9 The No on 522 Campaign would not comply with the law or remedy past violations by
10 merely placing the name of this fictional political committee in its “top five contributor” list.
11 The GMA distributed funds to the No on 522 Campaign in its own name while acting as an
12 illegal conduit. The No on 522 Campaign cannot list an illegal conduit in the top five
13 contributor list and conceal the identity of its actual top five donor list.

14 17. Changing the disclosures for future advertisements is necessary but not
15 sufficient. Voters might believe that new contributions merely changed the top five
16 contributor list. Corrective disclosures are necessary to draw the voters’ attention to the fact
17 that previous disclosures were erroneous and have been corrected, and indicate that voter can
18 get additional information from the Washington Public Disclosure Commission, including at
19 www.pdc.wa.gov.

20 **D. THE NO ON 522 CAMPAIGN HAD ACTUAL OR IMPUTED KNOWLEDGE**
21 **THAT ITS DISCLOSURES AND FILINGS WERE FALSE.**

22 18. The No on 522 Campaign always knew or had reason to know that food
23 company members of the GMA were funneling contributions through the GMA and that
24 GMA was a mere conduit, not a top contributor.

25 19. The No on 522 is being run by the same consultants who ran last year’s No on
26 Proposition 37 Campaign to defeat GMO labeling in California. Last year, GMA food

1 member companies gave approximately \$22 million to the No on Prop 37 campaign. The No
2 on 522 Campaign reported no contributions from these companies this year. The No on 522
3 Campaign knew that these major donors were giving through the GMA, or it would have
4 sought contributions from them.

5 20. The consultants in charge of the No on 522 Campaign understand the role of
6 the GMA and its member companies, and could not reasonably believe that the primary
7 donors to last year's campaign are sitting out this year.

8 21. Last year, these consultants received roughly \$22 million from the GMA to
9 support the No on Prop 37 Campaign, as shown by the GMA's 2012 tax return. *Exhibit C*
10 (excerpt). Because these consultants understood the role of the GMA as a mere conduit, their
11 reporting to the State of California disclosed the actual contributors – those GMA-member
12 companies that had paid the special assessment– rather than the conduit. *Exhibit D*. Thus,
13 these consultants saw the GMA acting the same way in both years. It was the No on 522
14 Campaign that chose to illegally disclose the conduit rather than the actual donors.

15 22. The overlap between the two campaigns is extensive. The table attached as
16 *Exhibit E* shows this overlap according to the campaign reporting filed with the PDC (for No
17 on 522) and the State of California (for No on Prop 37). Given the overlap of the consultants
18 in the two campaigns, including the general consultant, the knowledge of the No on Prop 37
19 Campaign must be imputed to the No on 522 Campaign.

20 23. Moreover, the knowledge of the GMA must be imputed to both campaigns.
21 The GMA was the leader of both campaigns. GMA's Vice President of Government Affairs
22 Louis A. Finkel was one of the two co-chairs to the No on Prop 37 Campaign. *Exhibit F, G*.
23 The primary consultant for both campaigns, Winner and Mandanbach Campaigns, reports
24 that it has represented the GMA since 1991, including helping the GMA win ballot measure
25 campaigns pertaining to labeling. *Exhibit H*. In addition, the GMA was one of the first
26

1 entities involved in the No on 522 Campaign and built the campaign. It organized the
2 campaign internally and conducted polling before any other organization in the State of
3 Washington was involved. *Compare Exhibits B ¶¶ 12-17 and Exhibit I.*

4 24. The No on 522 Campaign knew its reporting and disclosures were false, or
5 had reason to know and a duty to investigate the accuracy of its reporting and disclosures.

6 **E. THE ILLEGAL ADVERTISING AND FALSE REPORTING CONCEALS**
7 **CRITICAL INFORMATION FROM WASHINGTON VOTERS**

8 25. The No on 522 Campaign's illegal advertisements and reporting to the Public
9 Disclosure Commission inform voters that the GMA made \$7.2 million in contributions from
10 its general treasury, which is not true.

11 26. This illegal advertising and reporting prejudices the voters. Voters are falsely
12 informed that the GMA funded these contributions. Voters are given no reason to believe
13 that the GMA was merely acting as a conduit for other companies' contributions.

14 27. In addition, because the GMA did not timely file as a political committee –
15 despite acting as one – voters have had no place to look to find the source of the concealed
16 contributions. Washington voters have had no information about this shadowy organization
17 or the source of the concealed contributions it is handling for the No on 522 Campaign.

18 **V. FIRST CAUSE OF ACTION:**
19 **VIOLATION OF RCW 42.17A**

20 28. Plaintiff reincorporates and realleges all previous paragraphs as if fully set
21 forth herein.

22 29. The No on 522 Campaign's advertisements illegally listed the GMA as a top
23 donor, when the GMA is actually operating as a conduit to conceal contributions from other
24 out-of-state corporations. They failed and continue to fail to list the actual top five
25 contributors.
26

1 30. The No on 522 Campaign’s reporting to the PDC illegally misrepresent the
2 contributions of the GMA and its member companies and the true donors to its campaign.

3 31. The No on 522 Campaign illegally accepted, handled, and/or spent funds from
4 the GMA.

5 32. All of these violations were carried out knowingly or intentionally.

6 33. The No on 522 Campaign has violated one or more of the following sections:

7 a. RCW 42.17A.715 provides:

8 “No payment shall be made to any person required to report under
9 RCW 42.17A.700 and no payment shall be accepted by any such person,
10 directly or indirectly, in a fictitious name, anonymously, or by one
11 person through an agent, relative, or other person in such a manner as to
12 conceal the identity of the source of the payment or in any other manner
13 so as to effect concealment.”

14 b. RCW 42.17A.435 provides:

15 “No contribution shall be made and no expenditure shall be incurred,
16 directly or indirectly, in a fictitious name, anonymously, or by one
17 person through an agent, relative, or other person in such a manner as
18 to conceal the identity of the source of the contribution or in any other
19 manner so as to effect concealment.”

20 c. RCW 42.17A.460 provides:

21 “All contributions made by a person or entity, either directly or
22 indirectly, to a candidate, to a state official against whom recall
23 charges have been filed, or to a political committee, are considered to
24 be contributions from that person or entity to the candidate, state
25 official, or political committee, as are contributions that are in any way
26

1 earmarked or otherwise directed through an intermediary or conduit to
2 the candidate, state official, or political committee. For the purposes of
3 this section, "earmarked" means a designation, instruction, or
4 encumbrance, whether direct or indirect, expressed or implied, or oral
5 or written, that is intended to result in or does result in all or any part
6 of a contribution being made to a certain candidate or state official. If a
7 conduit or intermediary exercises any direction or control over the
8 choice of the recipient candidate or state official, the contribution is
9 considered to be by both the original contributor and the conduit or
10 intermediary.”

11 d. RCW 42.17A.470 provides:

12 “A person, other than an individual, may not be an intermediary or an
13 agent for contribution.”

14 e. RCW 42.17A.485 provides:

15 “A person may not, directly or indirectly, reimburse another person for
16 a contribution to a candidate for public office, political committee, or
17 political party.”

18 f. RCW 42.17A.205 requires political committees to file statements of
19 organization. RCW 42.17A.235 *et seq.* requires specific reporting by political
20 committees, including the reporting of the identity of all people and entities
21 who have given contributions, including pledges.

22 g. RCW 42.17A.270 requires a political committee receiving a contribution
23 earmarked for another political committee to file special reports on the
24 earmarked contribution.

25 h. RCW 42.17A.300 provides:
26

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

“(1) The legislature finds that:

(a) Timely disclosure to voters of the identity and sources of funding for electioneering communications is vitally important to the integrity of state, local, and judicial elections.”

i. RCW 42.17A.320 provides:

“(4) ... If the advertisement or communication is undertaken by a nonindividual other than a party organization, then the following notation must also be included: ‘Top Five Contributors’ followed by a listing of the names of the five persons or entities making the largest contributions in excess of seven hundred dollars reportable under this chapter during the twelve-month period preceding the date on which the advertisement is initially published or otherwise presented to the public. ...

...

(6) Political advertising costing one thousand dollars or more supporting or opposing ballot measures sponsored by a political committee must include the information on the ‘Top Five Contributors’ consistent with subsections (4) and (5) of this section.”

j. WAC 390-18-010(6)(a) provides:

“Political committees that sponsor political advertising costing one thousand dollars or more supporting or opposing a ballot measure shall comply with the ‘top five contributors’ provisions of RCW 42.17A.320 and this information shall be clearly spoken or identified as provided in RCW 42.17A.320. The ‘top five’ contributors shall be identified pursuant to WAC 390-18-025.”

1
2 k. WAC 390-18-025 provides:

3 “(1) For purposes of RCW 42.17A.320 (2), (4), (5) and (6), ‘top five
4 contributors’ means the five persons, as defined in RCW 42.17A.005, giving
5 the largest aggregate contributions exceeding seven hundred dollars during the
6 twelve-month period preceding the date on which the advertisement is
7 published or otherwise presented to the public. ...

8 ...

9
10 (3) For political advertisements supporting or opposing ballot measures
11 costing one thousand dollars, the ‘top five contributors’ identification
12 requirement of RCW 42.17A.320 applies to all political committees.”

13
14 **VI. RELIEF REQUESTED**

15 WHEREFORE, Plaintiff representing the State of Washington respectfully requests that this
16 Court grant the following relief:

17 1. Protect Washington voters by immediately enjoining the No on 522 Campaign
18 from broadcasting or distributing any advertisements that do not contain accurate “top five
19 contributor” disclosures;

20 2. Order the No on 522 Campaign to include corrective disclosures on future
21 advertisements informing the voters that previous disclosures were erroneous and providing
22 an avenue to get truthful information;

23 3. Order the No on 522 Campaign to file corrective campaign financing reports with
24 the Public Disclosure Commission;

1 4. Enjoin the No on 522 Campaign from accepting and spending contributions from
2 the Grocery Manufacturers Association or its newly formed political committee which were
3 contributed by a Grocery Manufacturer Association member;

4 5. Order the No on 522 Campaign to pay a penalty equal to the amount of the
5 concealed contributions, including treble penalties if the Court finds that the violations were
6 intentional.

7 6. Award reasonable attorneys fees and costs from the defendant or from the
8 State of Washington.

9 7. Award such other and different relief as this Court deems to be just and
10 appropriate.

11 Respectfully submitted this 21st day of October 2013

12 SMITH & LOWNEY PLLC

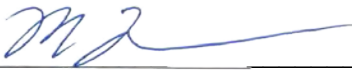
13 By 
14 Knoll Lowney, WSBA No. 23457
15 Claire Tonry, WSBA No. 44497
16
17
18
19
20
21
22
23
24
25
26

EXHIBIT A

The Opposite of Truth



NO 522

Look into the Facts

FactsAbout522.com

THIS VOTER INFORMATION PAID FOR BY NO ON 522, OLYMPIA, WA
TOP FIVE CONTRIBUTORS: GROCERY MANUFACTURERS ASSOCIATION,
MONSANTO COMPANY, DUPONT PIONEER, DOW AGROSCIENCES LLC,
BAYER CROPSCIENCE.



0:00

0:25 / 0:31



YouTube is now full screen.

Allow

Exit full screen

**Groups Representing over 50,000 Washington
Farmers, Consumers, Doctors & Scientists Urge**

NO 522



FactsAbout522.com

THIS VOTER INFORMATION PAID FOR BY NO ON 522, OLYMPIA, WA
TOP FIVE CONTRIBUTORS: GROCERY MANUFACTURERS ASSOCIATION,
MONSANTO COMPANY, DUPONT PIONEER, DOW AGROSCIENCES LLC,
BAYER CROPSCIENCE.

Exhibit B

COPY

FILED
OCT 16 2013
SUPERIOR COURT
CLATSOP COUNTY
ASTORIA, OREGON

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

STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

GROCERY MANUFACTURERS
ASSOCIATION,

Defendant.

NO.

13-2-02156-8

COMPLAINT FOR CIVIL
PENALTIES AND FOR
INJUNCTIVE RELIEF FOR
VIOLATIONS OF RCW 42.17A

I. NATURE OF ACTION

The State of Washington ("State") brings this action to enforce the state's campaign finance disclosure law, RCW 42.17A. The State alleges that Defendant Grocery Manufacturers Association ("GMA") violated provisions of RCW 42.17A by 1) soliciting and receiving contributions and making expenditures to oppose Initiative 522 without properly registering and reporting as a political committee, 2) failing to identify a treasurer for the political committee, 3) failing to identify a depository for funds collected by the political committee, and 4) concealing the true source of the contributions received and made by Defendant GMA. The State seeks relief under RCW 42.17A.750 and .765, including penalties, costs and fees, and injunctive relief.

1 II. VENUE AND JURISDICTION

- 2 1. This Court has jurisdiction over Defendant GMA, pursuant to RCW 42.17A, and the
3 Attorney General has authority to bring this action on behalf of the State of Washington
4 pursuant to RCW 42.17A.765 and RCW 42.17A.750.
- 5 2. Defendant GMA carried out the violations alleged in this complaint, in whole or in part,
6 in Thurston County, Washington.
- 7 3. Venue is proper in Thurston County Superior Court pursuant to RCW 4.12.

8 III. PARTIES

- 9 4. Plaintiff is the State of Washington. Acting through the Washington State Public
10 Disclosure Commission, Attorney General, or local prosecuting attorney, the State enforces
11 the state campaign finance disclosure laws contained in RCW 42.17A.
- 12 5. Defendant Grocery Manufacturers Association is an association of food, beverage, grocery,
13 and consumer products manufacturers located in Washington, D.C. that solicited funds
14 from its members to, in part, make contributions and expenditures to oppose Initiative 522.

15 IV. FACTUAL ALLEGATIONS

16 Initiative 522

- 17 6. On June 29, 2012, Chris and Leah McManus submitted Initiative 522 to the Washington
18 State Secretary of State. As identified by the Secretary of State, Initiative 522 “would
19 require most raw agricultural commodities, processed foods, and seeds and seed stocks, if
20 produced using genetic engineering as defined, to be labeled as genetically engineered
21 when offered for retail sale.”
- 22 7. The Secretary of State then forwarded Initiative 522 to the Washington State Legislature
23 pursuant to state law. Under state law, if the Legislature failed to act on Initiative 522 by
24 the end of the 2013 legislative session, Initiative 522 would be submitted to Washington
25 voters in November 2013.

1 8. The Legislature did not act on Initiative 522 within the time frames allotted by statute. The
2 matter is now set on the November 5, 2013 General Election ballot.

3 **Political Committees Supporting and Opposing Initiative 522**

4 9. There are currently eight political committees registered with the PDC to support or oppose
5 Initiative 522, seven supporting and one opposing.

6 10. The seven committees supporting Initiative 522 registered with the PDC on May 4, 2012
7 (Label It Now); August 6, 2012 (GMO Right to Know); February 11, 2013 (Yes on 522);
8 February 20, 2013 (EWG Yes); March 20, 2013 (Organic Consumers Fund); June 19, 2013
9 (GMO Awareness); and September 10, 2013 (Farmers & Friends).

10 11. Currently, the one political committee registered to oppose Initiative 522 is No on 522,
11 which registered with the PDC on January 15, 2013.

12 **Grocery Manufacturers Association's Opposition to Mandatory Labeling**

13 12. Following the 2012 defeat of a California ballot measure (Proposition 37) which was
14 similar in purpose to Initiative 522, GMA staff and its Board of Directors ("GMA Board")
15 began review and development of short- and long-term strategies to oppose mandatory
16 labeling on products containing genetically engineered or modified organisms. GMA, its
17 Board, and its members determined that a "long-term, thoughtful, strategically flexible
18 approach" to product labeling issues was necessary at the local, state, and national levels.

19 13. In December 2012, following meetings of the GMA Government Affairs Council and
20 GMA Board, the GMA Board directed GMA staff to conduct baseline polling in
21 Washington State "to determine the viability of a campaign to defeat I-522." The GMA
22 Board also directed GMA staff to "scope out a funding mechanism to address the GMO
23 issue" "while better shielding individual companies from attack for providing funding." At
24 the same time, the GMA Board directed GMA staff to prepare to oppose "efforts to require
25 mandatory GMO labels: a. Fight Washington State Ballot Measure" and "begin
26 preparations for a campaign, . . . to defeat I-522, the Washington State Ballot measure."

- 1 14. In January 2013, GMA staff presented the GMA Board with options for addressing “GMO
2 Labeling Post Prop 37.” The GMA Board discussion included discussion of Initiative 522,
3 an estimated cost for a campaign to defeat Initiative 522, and consideration of GMA
4 members’ “appetite to mount a campaign to defeat the Washington State Measure.”
- 5 15. At its January 19, 2013 meeting, the GMA Board supported a “multipronged” approach to
6 mandatory labeling issues and directed GMA staff to “oppose all state efforts” to impose
7 mandatory labeling by engaging in a state-by-state campaign.
- 8 16. Also at its January 19, 2013 meeting, the GMA Board expressed a desire to plan for
9 funding long-term GMA goals with “a preference for GMA to be the funder of such efforts,
10 rather than individual companies.”
- 11 17. In a February 18, 2013 memorandum to the GMA Board, GMA’s Chief Executive Officer
12 Pamela G. Bailey proposed a cost estimate for the multi-pronged approach to labeling
13 issues, which included the cost to “fight Washington State Ballot Measure” in 2013. CEO
14 Bailey also included in her memorandum the establishment of a separate GMA fund that
15 would “allow for greater planning for the funds to combat current threats and better shield
16 individual companies from attack that provide funding for specific efforts.” The fund
17 would allow GMA to be identified as the source of funding for efforts that included
18 defeating Initiative 522.
- 19 18. GMA named the fund the “Defense of Brand Strategic Account” (“Account”) and
20 determined that it would be funded from an assessment to GMA members separate from
21 their normal association dues. The Account would be segregated from other GMA funds.
22 GMA expressed its intent that GMA’s opposition to a mandatory labeling program would
23 be paid for from the Account. GMA also originally set a three-year period for this
24 program, running from 2013 through 2015. GMA anticipated a number of different actions
25 would be taken regarding the mandatory labeling issue, including opposition to the pending
26 Initiative 522.

- 1 19. Following GMA Board approval in January and February 2013, GMA staff sent invoices
2 for the Account to GMA members in March and August 2013. Goals identified for the
3 Account included to “defeat ballot measures” and continue to “oppose all state measures.”
- 4 20. GMA identified the portion of 2013 Account budget to be allotted to oppose Initiative 522
5 was \$10,000,000.
- 6 21. On March 15, 2013, CEO Bailey sent a memorandum to GMA members with the first
7 Account invoice. In addition to a description of the purpose of the Account, Ms. Bailey
8 provided GMA members an “Update on Washington State,” which described GMA efforts
9 to “assess the viability of a campaign to defeat I-522” and the results of GMA’s polling
10 efforts. Ms. Bailey further advised GMA members that “[m]uch like California, [the
11 opposition to Initiative 522] campaign will be challenging.” She then promised to provide
12 updates to GMA members about “our progress on the Washington State efforts.”
- 13 22. The March Account invoice further described the amount GMA billed its members as a
14 “contribution” for its 2013 Defense of Brands Strategic Account and was the first of two
15 installments with a due date of April 15, 2013.
- 16 23. On May 8, 2013, the No on 522 political committee reported receiving a contribution from
17 GMA in the amount of \$472,500. GMA also identified to its membership that the
18 \$472,500 contribution made to the No on 522 political committee came from funds
19 collected from GMA members for the Defense of Brands Strategic Account.
- 20 24. On or about August 13, 2013, GMA sent the next invoice to GMA members for the second
21 installment to the 2013 Defense of Brands Strategic Account, again labeling the installment
22 as a contribution to the Account.
- 23 25. On or about August 23, 2013, GMA contributed \$1,750,000 to the No on 522 political
24 committee from its Defense of Brands Strategic Account.
- 25 26. On or about September 27, 2013, GMA contributed \$5,000,000 to the No on 522 political
26 committee from its Defense of Brands Strategic Account.

1 27. All the funds used for GMA's contributions to the No on 522 political committee came
2 from its Defense of Brands Strategic Account.

3 28. As of October 7, 2013, GMA has accumulated \$13,480,500 from GMA members
4 contributions to the Account. Of that amount collected, GMA spent a total of \$7,222,500
5 in contributions to the No on 522 political committee to oppose Washington's Initiative
6 522.

7 V. CLAIMS

8 Based on the foregoing factual allegations and information and belief available to date,
9 the State makes the following claims, each of which may give rise to multiple violations of
10 RCW 42.17A.

11 1. First Claim: The State reasserts the factual allegations made above and further asserts
12 that Defendant GMA, in violation of RCW 42.17A.205, failed to register as a political
13 committee within two weeks after the date it first had the expectation of receiving
14 contributions or making expenditures in the election campaign to oppose Initiative 522.

15 2. Second Claim: The State reasserts the factual allegations made above and further asserts
16 that Defendant GMA, in violation of RCW 42.17A.210 and RCW 42.17A.215, failed to
17 identify a treasurer for its political committee and a depository for its funds.

18 3. Third Claim: The State reasserts the factual allegations made above and further asserts
19 that Defendant GMA, in violation of RCW 42.17A.235, .240 and .245, failed to regularly,
20 timely, and electronically report the financial activities of its political committee, including
21 identifying the sources of the contributions it received to make its expenditures to the No
22 on 522 political committee to oppose Initiative 522.

23 4. Fourth Claim: The State reasserts the factual allegations made above and further asserts
24 that Defendant GMA, in violation of RCW 42.17A.435, acted to conceal the true sources of
25 funding for its electoral activities in opposing Initiative 522, including contributions it
26

1 received from GMA members and the contributions it made to the No on 522 political
2 committee.

3 5. Fifth Claim: The State reasserts the factual allegations made above and further asserts
4 that the actions of Defendant GMA stated in the above claims were negligent and/or
5 intentional.

6 I. VI. RELIEF REQUESTED

7 WHEREFORE, the State hereby requests that the following relief as provided by
8 RCW 42.17A:

- 9 1. Assess a penalty against Defendant GMA for its failures to timely and properly comply
10 with the above identified provisions of RCW 42.17A;
- 11 2. Compel Defendant GMA to register and report the financial transactions related to the
12 operation of its Defense of Brands Strategic Account as provided for in RCW 42.17A;
- 13 3. Order Defendant GMA to pay all costs of investigation and trial, including reasonable
14 attorneys fees, as authorized by RCW 42.17A.765(5);
- 15 4. In the event the Court finds Defendant GMA intentionally violated state campaign
16 finance disclosure laws, order any penalty assessed against Defendant GMA to be
17 trebled as authorized by RCW 42.17A.765(5); and
- 18 5. Grant such additional and further relief as the Court deems appropriate.

19 Dated this 16th day of October, 2013.

20
21 Respectfully submitted,
22 ROBERT W. FERGUSON
23 Attorney General

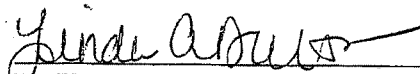
24 
25 LINDA A. DALTON, WSBA #15467
26 Senior Assistant Attorney General
CALLIE A. CASTILLO, WSBA #38214
Assistant Attorney General
Attorneys for Plaintiff

Exhibit C

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

OMB No 1545-0047
2012
Open to Public Inspection

Department of the Treasury
Internal Revenue Service

The organization may have to use a copy of this return to satisfy state reporting requirements.

A For the **2012** calendar year, or tax year beginning and ending

B Check if applicable <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	C Name of organization Grocery Manufacturers Association Doing Business As		D Employer identification number 53-0114930
	Number and street (or P.O. box if mail is not delivered to street address) Room/suite 1350 I Street, NW 300		E Telephone number (202) 639-5900
	City, town, or post office, state, and ZIP code Washington, DC 20005		G Gross receipts \$ 59,990,992.
	F Name and address of principal officer. Mr. Steve McCroddan same as C above		H(a) Is this a group return for affiliates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H(b) Are all affiliates included? <input type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach a list. (see instructions) H(c) Group exemption number

I Tax-exempt status: 501(c)(3) 501(c)(**6**) (insert no.) 4947(a)(1) or 527

J Website: **www.gmaonline.org**

K Form of organization: Corporation Trust Association Other

L Year of formation: **1909** **M** State of legal domicile: **DE**

Part I Summary

Activities & Governance	1	Briefly describe the organization's mission or most significant activities. GMA represents the world's leading food, beverage and consumer products companies.	
	2	Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.	
	3	Number of voting members of the governing body (Part VI, line 1a)	3 50
	4	Number of independent voting members of the governing body (Part VI, line 1b)	4 50
	5	Total number of individuals employed in calendar year 2012 (Part V, line 2a)	5 107
	6	Total number of volunteers (estimate if necessary)	6 0
	7a	Total unrelated business revenue from Part VIII, column (C), line 13	7a 187,521.
7b	Net unrelated business taxable income from Form 990-E, line 34	7b 96,174.	
Revenue	8	Contributions and grants (Part VIII, line 1h)	Prior Year: 1,265,192. Current Year: 1,348,013.
	9	Program service revenue (Part VIII, line 2g)	24,479,724. 46,476,217.
	10	Investment income (Part VIII, column (A), lines 3-4, and 7d)	728,747. 1,218,601.
	11	Other revenue (Part VIII, column (A), lines 5, 6, 8, 9, 10e, and 11e)	2,268,145. 1,716,249.
	12	Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	28,741,808. 50,759,080.
Expenses	13	Grants and similar amounts paid (Part IX, column (A), lines 1-3)	185,175. 139,050.
	14	Benefits paid to or for members (Part IX, column (A), line 4)	0. 0.
	15	Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	14,642,571. 15,351,792.
	16a	Professional fundraising fees (Part IX, column (A), line 11e)	0. 0.
	b	Total fundraising expenses (Part IX, column (D), line 25)	0.
	17	Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	14,809,554. 35,039,084.
	18	Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	29,637,300. 50,529,926.
19	Revenue less expenses. Subtract line 18 from line 12	<895,492.> 229,154.	
Net Assets or Fund Balances	20	Total assets (Part X, line 16)	Beginning of Current Year: 46,156,345. End of Year: 53,559,069.
	21	Total liabilities (Part X, line 26)	20,033,129. 25,498,763.
	22	Net assets or fund balances. Subtract line 21 from line 20	26,123,216. 28,060,306.

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	Signature of officer <i>Steve McCroddan</i>	Date 5/9/13
	Mr. Steve McCroddan, Sr. VP, CFO, CAO	Type or print name and title
Paid Preparer Use Only	Print/Type preparer's name Thomas J. Raffa	Preparer's signature <i>Thomas J. Raffa</i>
	Firm's name Raffa, P.C.	Date 5/7/13
	Firm's address 1899 L Street, NW, Suite 900 Washington, DC 20036	Check <input type="checkbox"/> self-employed PTIN P00916458
	Firm's EIN 52-1511275	Phone no. (202) 822-5000

May the IRS discuss this return with the preparer shown above? (see instructions) Yes No

RECEIVED MAY 10 2013

SCANNED JUN 24 2013

RECEIVED
 MAY 23 2013
 COLLEEN, UT
 IRS

916

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

(A) Name and title	(B) Average hours per week (list any hours for related organizations below line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
(18) Tom Ferriter, Bush Brothers & Co.; Director	1.00	X						0.	0.	0.
(19) C.J. Fraleigh, Shearer's Foods Inc.; Director	1.00	X						0.	0.	0.
(20) Joseph Gallo, E&J Gallo Winery Director	1.00	X						0.	0.	0.
(21) Robert Gamgort, Pinnacle Foods Group, LLC; Director	1.00	X						0.	0.	0.
(22) David Geise, Furmano Foods Director	1.00	X						0.	0.	0.
(23) William Gisel, Jr., Rich Products Corp.; Director	1.00	X						0.	0.	0.
(24) Paul Grimwood, Nestle, USA Director	1.00	X						0.	0.	0.
(25) Kenneth Guise, Jr., Knouse Foods Cooperative; Director	1.00	X						0.	0.	0.
(26) James Hannan, Georgia-Pacific LLC; Director	1.00	X						0.	0.	0.
1b Sub-total								0.	0.	0.
c Total from continuation sheets to Part VII, Section A								5,395,993.	0.	522,417.
d Total (add lines 1b and 1c)								5,395,993.	0.	522,417.

2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization **32**

	Yes	No
3 Did the organization list any former officer, director, or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule J for such individual		X
4 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule J for such individual	X	
5 Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule J for such person		X

Section B. Independent Contractors

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

(A) Name and business address	(B) Description of services	(C) Compensation
Coalition Against the Costly Food Labeling Proposition 455 Capital Mall, Suite 600, Sacramento, CA 95814	Lobbying - CA Ballot	21,875,000.
BBDO New York, 1285 Avenue of the Americas, New York, NY 10019	Consulting - Facts Up Front	1,181,397.
Daniel J. Edelman, Inc., 1875 I Street, NW, Suite 900, Washington, DC 20006	Consulting - Facts Up Front	741,626.
Hogan & Lovells US LLP 555 13th Street, NW, Washington, DC 20004	Consulting - General & CA Ballot	478,458.
Lin Sun-Hoffman P.O. Box 52048, Palo Alto, CA 94303	Consulting - Global Strategies	253,105.

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization **14**

See Part VII, Section A Continuation sheets

Part VIII Statement of Revenue

Check if Schedule O contains a response to any question in this Part VIII

		(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512, 513, or 514	
Contributions, Gifts, Grants and Other Similar Amounts	1 a Federated campaigns	1a				
	b Membership dues	1b				
	c Fundraising events	1c				
	d Related organizations	1d				
	e Government grants (contributions)	1e				
	f All other contributions, gifts, grants, and similar amounts not included above	1f 1,348,013.				
	g Noncash contributions included in lines 1a-1f \$					
	h Total. Add lines 1a-1f		1,348,013.			
Program Service Revenue	2 a Project funding	Business Code 900099	23,993,104.	23,993,104.		
	b Membership dues	900099	19,611,435.	19,611,435.		
	c Conf's/conventions	900099	2,731,407.	2,731,407.		
	d Publications	900099	140,271.	140,271.		
	e					
	f All other program service revenue					
	g Total. Add lines 2a-2f		46,476,217.			
Other Revenue	3 Investment income (including dividends, interest, and other similar amounts)		948,285.		948,285.	
	4 Income from investment of tax-exempt bond proceeds					
	5 Royalties		46,248.		46,248.	
	6 a Gross rents	(i) Real				
		(ii) Personal				
		b Less: rental expenses				
		c Rental income or (loss)				
	d Net rental income or (loss)					
	7 a Gross amount from sales of assets other than inventory	(i) Securities				
		(ii) Other				
		b Less: cost or other basis and sales expenses		9,502,228.		
		c Gain or (loss)		9,231,912.		
d Net gain or (loss)		270,316.		270,316.		
8 a Gross income from fundraising events (not including \$ _____ of contributions reported on line 1c). See Part IV, line 18	a					
	b Less: direct expenses					
	c Net income or (loss) from fundraising events					
9 a Gross income from gaming activities. See Part IV, line 19	a					
	b Less: direct expenses					
	c Net income or (loss) from gaming activities					
10 a Gross sales of inventory, less returns and allowances	a					
	b Less: cost of goods sold					
	c Net income or (loss) from sales of inventory					
Miscellaneous Revenue		Business Code				
11 a Sublease rental income **	900099	698,641.	698,641.			
b Claims reimbursements	900099	622,809.	622,809.			
c Expense reimbursements	900099	159,473.	159,473.			
d All other revenue 541800 & 541610 &	900099	189,078.	1,557.	187,521.		
e Total. Add lines 11a-11d		1,670,001.				
12 Total revenue. See instructions.		50,759,080.	47,958,697.	187,521.	1,264,849.	

232009
12-10-12

** Sublease income - from non-investment property; non-debt financed

Form 990 (2012)

Exhibit D



HOME >
SITE SEARCH >
CONTACT US >

SECRETARY OF STATE

ELECTIONS & VOTER INFO

POLITICAL REFORM

CALIFORNIA BUSINESS PORTAL

ARCHIVES & MUSEUM

OTHER SERVICES

Cal-Access Search

GO

Cal-Access

[Advanced Search](#)

Cal-Access Home

Campaign Finance

Candidates & Elected Officials

Propositions & Ballot Measures

Committees, Parties, Major Donors & State Mailers

Daily/Late/Special Filings

Lobbying Activity

Resources

For Filers Only

Political Reform

User's Manual

Campaign Finance:

NO ON 37: COALITION AGAINST THE DECEPTIVE FOOD LABELING SCHEME, SPONSORED BY FARMERS AND FOOD PRODUCERS

Election Cycle:

- 2013 through 2014
- Historical
 - 2011 through 2012
 - 2009 through 2010
 - 2007 through 2008
 - 2005 through 2006
 - 2003 through 2004
 - 2001 through 2002
 - 1999 through 2000

View Information:

(Due to the amount of data, these pages may take some time to load.)

- General Information
- Contributions Received
- Contributions Made
- Expenditures Made
- Late and \$5000+ Contributions Received
- Late Contributions Made
- Late Independent Expenditures
- Electronic Filings

The sources and amounts of contributions to the committee are itemized here. You may click on any of the headers to sort by that category.

Contribution Type:

- All Contributions
- Loan Contributions
- Monetary Contributions
- Non-Monetary Contributions

DOWNLOAD THESE RESULTS: [MICROSOFT EXCEL](#)

Due to file size, pages display in segments of 250 contributions. For complete listing, click "Show All".

1 2 Show All

NAME OF CONTRIBUTOR	AMOUNT	TRANSACTION DATE
COUNCIL FOR BIOTECHNOLOGY INFORMATICS	\$375,000.00	2/21/2012
GROCERY MANUFACTURERS ASSOCIATION	\$250,000.00	2/24/2012
PEPSICO, INC.	\$54,725.12	6/26/2012
BIMBO BAKERIES USA	\$10,786.87	6/26/2012
RICHELIEU FOODS, INC.	\$165.80	6/26/2012
SOLAE, LLC	\$1,992.84	6/26/2012
COCA-COLA NORTH AMERICA	\$37,127.50	6/26/2012
WM. WRIGLEY JR. COMPANY	\$3,933.08	6/26/2012
NESTLE USA, INC.	\$37,286.93	6/26/2012
CARGILL, INC.	\$6,584.36	6/26/2012
MORTON SALT	\$682.35	6/26/2012
KELLOGG COMPANY	\$20,167.59	6/26/2012
C. H. GUENTHER & SON, INC.	\$787.57	6/26/2012
RICH PRODUCTS CORPORATION	\$7,343.23	6/26/2012
SUNNY DELIGHT BEVERAGES COMPANY	\$3,156.67	6/26/2012
THE J.M. SMUCKER COMPANY	\$12,371.58	6/26/2012
KNOUSE FOODS COOPERATIVE, INC.	\$4,422.52	6/26/2012
CONAGRA FOODS	\$34,331.14	6/26/2012
MCCAIN FOODS USA, INC.	\$1,702.69	6/26/2012
INVENTURE FOODS, INC.	\$497.41	6/26/2012
HORMEL FOODS CORPORATION	\$11,934.75	6/26/2012
GROCERY MANUFACTURERS ASSOCIATION	\$125,000.00	4/9/2012
BIOTECHNOLOGY INDUSTRY ORGANIZATION	\$2,000.00	5/31/2012
WM. WRIGLEY JR. COMPANY	\$116,865.91	8/3/2012
CARGILL, INC.	\$143,575.49	8/13/2012
COCA-COLA NORTH AMERICA	\$603,191.45	8/13/2012
CONAGRA FOODS	\$520,101.54	8/13/2012
DEAN FOODS COMPANY	\$182,381.90	8/13/2012
HERSHEY COMPANY	\$283,753.06	8/13/2012
HORMEL FOODS CORPORATION	\$260,243.61	8/13/2012
HOUSE-AUTRY MILLS, INC.	\$1,077.27	8/13/2012
INVENTURE FOODS, INC.	\$10,846.39	8/13/2012
KELLOGG COMPANY	\$516,952.06	8/13/2012
MCCORMICK & COMPANY, INC.	\$178,252.37	8/13/2012
MORTON SALT	\$14,879.01	8/13/2012
NESTLE USA, INC.	\$607,928.61	8/13/2012
OCEAN SPRAY CRANBERRIES, INC.	\$199,506.32	8/13/2012
PEPSICO, INC.	\$1,126,079.94	8/13/2012
PINNACLE FOODS GROUP LLC	\$191,107.80	8/13/2012
RICH PRODUCTS CORPORATION	\$160,123.18	8/13/2012
BASF PLANT SCIENCE	\$519,200.00	8/13/2012
SYNGENTA CORPORATION	\$260,000.00	8/13/2012
BAYER CROPSCIENCE	\$554,400.00	8/13/2012
DOW AGROSCIENCES LLC	\$1,184,800.00	8/13/2012
MONSANTO COMPANY	\$4,208,000.00	8/13/2012
E.I. DUPONT DE NEMOURS & CO.	\$1,273,600.00	8/13/2012

ABBOTT NUTRITION	\$3,918.86	9/4/2012
BUMBLE BEE FOODS, LLC	\$270,426.38	9/4/2012
BUNGE NORTH AMERICA, INC.	\$5,193.11	9/4/2012
CAMPBELL SOUP COMPANY	\$179,545.09	9/4/2012
CLEMENT PAPPAS & COMPANY, INC.	\$522.24	9/4/2012
DEL MONTE FOODS COMPANY	\$484,125.39	9/4/2012
CLOROX COMPANY	\$685.17	9/4/2012
DOLE PACKAGED FOODS COMPANY	\$125,681.56	9/4/2012
GENERAL MILLS, INC.	\$388,798.83	9/4/2012
GODIVA CHOCOLATIER, INC.	\$30,666.30	9/4/2012
H.J. HEINZ COMPANY	\$10,444.71	9/4/2012
HERO NORTH AMERICA	\$58,028.97	9/4/2012
HIRZEL CANNING COMPANY	\$313.34	9/4/2012
IDAHOAN FOODS, LLC	\$7,181.81	9/4/2012
KRAFT FOODS GLOBAL, INC.	\$34,404.88	9/4/2012
LAND O'LAKES, INC.	\$59,321.70	9/4/2012
MARS INCORPORATED	\$5,773.99	9/4/2012
OCEAN SPRAY GRANBERRIES, INC.	\$60,546.79	9/4/2012
REILY FOODS COMPANY	\$13,214.52	9/4/2012
SARA LEE CORPORATION	\$246,766.78	9/4/2012
SARGENTO FOODS, INC.	\$153.30	9/4/2012
SMITHFIELD FOODS, INC.	\$14,286.28	9/4/2012
BASF PLANT SCIENCE	\$357,700.00	9/14/2012
E.I. DUPONT DE NEMOURS & CO.	\$874,800.00	9/14/2012
SYNGENTA CORPORATION	\$178,700.00	9/14/2012
BAYER CROPSCIENCE	\$381,600.00	9/14/2012
DOW AGROSCIENCES LLC	\$815,200.00	9/14/2012
MONSANTO COMPANY	\$2,892,000.00	9/14/2012
ABBOTT NUTRITION	\$183,681.14	9/28/2012
BRUCE FOODS CORPORATION	\$10,196.38	9/28/2012
BUNGE NORTH AMERICA, INC.	\$78,046.21	9/28/2012
CLEMENT PAPPAS & COMPANY, INC.	\$32,493.78	9/28/2012
CLOROX COMPANY	\$32,114.83	9/28/2012
FARIBAUT FOODS, INC.	\$21,162.30	9/28/2012
FLOWERS FOODS, INC.	\$46,685.32	9/28/2012
GOYA DE PUERTO RICO, INC.	\$11,350.69	9/28/2012
H.J. HEINZ COMPANY	\$489,555.29	9/28/2012
HIRZEL CANNING COMPANY	\$4,709.14	9/28/2012
KRAFT FOODS GLOBAL, INC.	\$516,743.37	9/28/2012
MARS INCORPORATED	\$270,633.32	9/28/2012
SARGENTO FOODS, INC.	\$7,185.27	9/28/2012
SATICOY FOODS CORPORATION	\$320.64	9/28/2012
SMITHFIELD FOODS, INC.	\$214,705.57	9/28/2012
TREE TOP, INC.	\$29,338.65	9/28/2012
WELCH FOODS, INC.	\$44,248.45	9/28/2012
GOYA FOODS GREAT LAKES	\$6,829.65	9/28/2012
BASF PLANT SCIENCE	\$126,600.00	7/26/2012

E.I. DUPONT DE NEMOURS & CO.	\$310,100.00	7/26/2012
SYNGENTA CORPORATION	\$63,300.00	7/26/2012
BIMBO BAKERIES USA	\$6,996.41	7/27/2012
C. H. GUENTHER & SON, INC.	\$510.82	7/27/2012
CAMPBELL SOUP COMPANY	\$5,340.56	7/27/2012
CARGILL, INC.	\$4,270.64	7/27/2012
COCA-COLA NORTH AMERICA	\$24,081.05	7/27/2012
CONAGRA FOODS	\$22,267.32	7/27/2012
DEAN FOODS COMPANY	\$5,424.94	7/27/2012
DEL MONTE FOODS COMPANY	\$14,400.28	7/27/2012
GENERAL MILLS, INC.	\$19,401.17	7/27/2012
DOLE PACKAGED FOODS COMPANY	\$3,738.39	7/27/2012
GODIVA CHOCOLATIER, INC.	\$912.17	7/27/2012
HERO NORTH AMERICA	\$1,726.07	7/27/2012
HERSHEY COMPANY	\$8,440.22	7/27/2012
HORMEL FOODS CORPORATION	\$7,740.93	7/27/2012
HOUSE-AUTRY MILLS, INC.	\$32.04	7/27/2012
IDAHOAN FOODS, LLC	\$213.62	7/27/2012
INVENTURE FOODS, INC.	\$322.62	7/27/2012
THE J.M. SMUCKER COMPANY	\$8,024.26	7/27/2012
KELLOGG COMPANY	\$13,080.78	7/27/2012
KNOUSE FOODS COOPERATIVE, INC.	\$2,868.47	7/27/2012
LAND O'LAKES, INC.	\$1,764.52	7/27/2012
MCCAIN FOODS USA, INC.	\$1,104.37	7/27/2012
MCCORMICK & COMPANY, INC.	\$5,302.10	7/27/2012
MORTON SALT	\$442.58	7/27/2012
NESTLE USA, INC.	\$24,184.46	7/27/2012
OCEAN SPRAY CRANBERRIES, INC.	\$7,735.26	7/27/2012
PEPSICO, INC.	\$35,494.94	7/27/2012
PINNACLE FOODS GROUP LLC	\$5,684.49	7/27/2012
REILY FOODS COMPANY	\$393.06	7/27/2012
RICH PRODUCTS CORPORATION	\$4,762.85	7/27/2012
RICHELIEU FOODS, INC.	\$107.54	7/27/2012
SARA LEE CORPORATION	\$7,340.06	7/27/2012
SOLAE, LLC	\$1,292.57	7/27/2012
SUNNY DELIGHT BEVERAGES COMPANY	\$2,047.43	7/27/2012
WM. WRIGLEY JR. COMPANY	\$2,551.01	7/27/2012
BASF PLANT SCIENCE	\$996,500.00	7/31/2012
E.I. DUPONT DE NEMOURS & CO.	\$2,441,500.00	7/31/2012
SYNGENTA CORPORATION	\$498,000.00	7/31/2012
BAYER CROPS SCIENCE	\$1,064,000.00	7/31/2012
BIMBO BAKERIES USA	\$320,516.72	8/3/2012
BUMBLE BEE FOODS, LLC	\$98,073.62	8/3/2012
C. H. GUENTHER & SON, INC.	\$23,401.61	8/3/2012
CAMPBELL SOUP COMPANY	\$65,114.35	8/3/2012
CARGILL, INC.	\$52,069.51	8/3/2012
COCA-COLA NORTH AMERICA	\$500,000.00	8/3/2012

CONAGRA FOODS	\$500,000.00	8/3/2012
DEAN FOODS COMPANY	\$66,143.16	8/3/2012
DEL MONTE FOODS COMPANY	\$175,574.33	8/3/2012
DOLE PACKAGED FOODS COMPANY	\$45,580.05	8/3/2012
GENERAL MILLS, INC.	\$500,000.00	8/3/2012
GODIVA CHOCOLATIER, INC.	\$11,121.53	8/3/2012
HERO NORTH AMERICA	\$21,044.96	8/3/2012
HERSHEY COMPANY	\$102,906.72	8/3/2012
HORMEL FOODS CORPORATION	\$94,380.71	8/3/2012
HOUSE-AUTRY MILLS, INC.	\$390.69	8/3/2012
IDAHOAN FOODS, LLC	\$2,604.57	8/3/2012
INVENTURE FOODS, INC.	\$3,933.58	8/3/2012
THE J.M. SMUCKER COMPANY	\$367,604.16	8/3/2012
KELLOGG COMPANY	\$82,299.57	8/3/2012
KNOUSE FOODS COOPERATIVE, INC.	\$131,409.01	8/3/2012
LAND O'LAKES, INC.	\$21,513.78	8/3/2012
MARS INCORPORATED	\$100,242.69	8/3/2012
MCCAIN FOODS USA, INC.	\$50,592.94	8/3/2012
MCCORMICK & COMPANY, INC.	\$64,645.53	8/3/2012
MORTON SALT	\$5,396.06	8/3/2012
NESTLE USA, INC.	\$500,000.00	8/3/2012
OCEAN SPRAY CRANBERRIES, INC.	\$94,311.63	8/3/2012
PEPSICO, INC.	\$500,000.00	8/3/2012
PINNACLE FOODS GROUP LLC	\$69,307.71	8/3/2012
REILY FOODS COMPANY	\$4,792.42	8/3/2012
RICH PRODUCTS CORPORATION	\$58,070.74	8/3/2012
RICHELIEU FOODS, INC.	\$4,926.66	8/3/2012
SARA LEE CORPORATION	\$89,493.16	8/3/2012
SARGENTO FOODS, INC.	\$2,661.43	8/3/2012
SOLAE, LLC	\$59,214.59	8/3/2012
SUNNY DELIGHT BEVERAGES COMPANY	\$93,795.90	8/3/2012
ROCKY MOUNTAIN AGRIBUSINESS ASSOCI	\$250.00	9/24/2012
KATHLEEN BARTHOLET	\$100.00	9/24/2012
ILLINOIS FERTILIZER & CHEMICAL	\$250.00	9/25/2012
PETERSEN FARMS, INC.	\$250.00	9/27/2012
MARK WESTFALL	\$250.00	9/27/2012
LEO SIEREN	\$500.00	9/27/2012
JAMES HANN	\$100.00	9/27/2012
DAVID FOEHNER	\$100.00	9/28/2012
FOUR K FARMS	\$1,000.00	9/28/2012
DENNIS QUAM	\$100.00	9/28/2012
RANDY FORNOFF	\$100.00	9/30/2012
NANCY WARE	\$150.00	8/1/2012
CROPLIFE AMERICA	\$5,000.00	9/5/2012
JAY VROOM	\$250.00	9/7/2012
TRI-CAL INC.	\$1,000.00	9/13/2012
GRAY EXECUTIVE DIRECTION	\$100.00	9/13/2012

MINNESOTA CROP PRODUCTION RETAILER	\$250.00	9/21/2012
MICHIGAN AGRI-BUSINESS ASSOCIATION	\$500.00	9/21/2012
ELLIS MCFADDEN	\$100.00	9/22/2012
BRIAN NEDROW	\$200.00	9/23/2012
WM SIEFRING FARMS, LLC	\$100.00	9/24/2012
DANPROE FARM, LLC	\$100.00	9/24/2012
MONSANTO COMPANY	\$5,081.96	9/30/2012
GROCERY MANUFACTURERS ASSOCIATION	\$42,000.00	9/30/2012
MONSANTO COMPANY	\$797.67	9/30/2012
MONSANTO COMPANY	\$500.00	9/14/2012
BIOTECHNOLOGY INDUSTRY ORGANIZATION	\$250,000.00	7/9/2012
SYNGENTA CORPORATION	\$1,000,000.00	10/9/2012
ABBOTT NUTRITION	\$46,900.00	10/19/2012
B&G FOODS, INC.	\$40,000.00	10/19/2012
BIMBO BAKERIES USA	\$84,600.00	10/19/2012
BRUCE FOODS CORPORATION	\$21,603.62	10/19/2012
BUNGE NORTH AMERICA, INC.	\$165,360.68	10/19/2012
CAMPBELL SOUP COMPANY	\$250,000.00	10/19/2012
CLEMENT PAPPAS & COMPANY, INC.	\$66,983.98	10/19/2012
CLOROX COMPANY	\$6,900.00	10/19/2012
COCA-COLA NORTH AMERICA	\$291,100.00	10/19/2012
FARIBAULT FOODS, INC.	\$44,837.70	10/19/2012
FLOWERS FOODS, INC.	\$135,414.68	10/19/2012
GENERAL MILLS, INC.	\$227,100.00	10/19/2012
GOYA DE PUERTO RICO, INC.	\$24,049.31	10/19/2012
GOYA FOODS GREAT LAKES	\$14,470.35	10/19/2012
HERSHEY COMPANY	\$98,800.00	10/19/2012
HILLSHIRE BRANDS COMPANY	\$85,900.00	10/19/2012
HIRZEL CANNING COMPANY	\$9,977.52	10/19/2012
THE J.M. SMUCKER COMPANY	\$97,000.00	10/19/2012
KELLOGG COMPANY	\$158,200.00	10/19/2012
KNOUSE FOODS COOPERATIVE, INC.	\$28,900.00	10/19/2012
KRAFT FOODS GLOBAL, INC.	\$1,094,851.75	10/19/2012
LAND O'LAKES, INC.	\$20,700.00	10/19/2012
MEAD JOHNSON NUTRITION COMPANY	\$80,000.00	10/19/2012
MONDELEZ INTERNATIONAL	\$107,000.00	10/19/2012
MOODY DUNBAR, INC.	\$5,000.00	10/19/2012
NESTLE USA, INC.	\$146,200.00	10/19/2012
OCEAN SPRAY CRANBERRIES, INC.	\$25,000.00	10/19/2012
PEPSICO, INC.	\$429,100.00	10/19/2012
SATICOY FOODS CORPORATION	\$679.36	10/19/2012
SMITHFIELD FOODS, INC.	\$454,908.15	10/19/2012
SUNNY DELIGHT BEVERAGES COMPANY	\$20,700.00	10/19/2012
TREE TOP, INC.	\$81,261.35	10/19/2012
UNILEVER	\$372,100.00	10/19/2012
WELCH FOODS, INC.	\$122,751.55	10/19/2012
KRAFT FOOD GROUP	\$304,500.00	10/19/2012

ABE AND SHIRLEY HODGEN FARMS	\$100.00	10/1/2012
UBBEN FARMS	\$500.00	10/1/2012
MISSOURI AGRIBUSINESS ASSOCIATION	\$250.00	10/1/2012
I-80 FARMS	\$100.00	10/1/2012
BRIAN VCULEK FARM	\$100.00	10/1/2012
AGRIBUSINESS COUNCIL OF INDIANA	\$250.00	10/2/2012
KARL MYERS FARMS	\$100.00	10/2/2012
LOKAI FARMS	\$100.00	10/2/2012
GABLE BROTHERS	\$200.00	10/3/2012
HERBERT ADEN	\$100.00	10/5/2012
NORTH DAKOTA AGRICULTURAL ASSOCIATION	\$300.00	10/5/2012
MARTHA GALE	\$100.00	10/5/2012
CHERRY FARMS SEED COMPANY, INC.	\$100.00	10/8/2012
NORMAN ANDREAS	\$100.00	10/9/2012
CURNES FARMS, INC.	\$250.00	10/9/2012
HENRY KALLAL	\$100.00	10/9/2012
FLORIDA FERTILIZER & AGRICHEMICAL ASSOCIATION	\$500.00	10/11/2012
MARILYN TIMMONS	\$100.00	10/12/2012
SOUTH DAKOTA AGRI-BUSINESS ASSOCIATION	\$250.00	10/12/2012
RICHARD STANTON	\$150.00	10/15/2012
BILL CULPEPPER	\$100.00	10/15/2012
MIKE CARLSON FARMS PARTNERSHIP	\$200.00	10/12/2012
JMR FARMS, INC.	\$1,000.00	10/15/2012
MONTANA AGRICULTURAL BUSINESS ASSOCIATION	\$350.00	10/16/2012
MICHAEL KENYON	\$300.00	10/16/2012
LAND OF MILK & HONEY FARMS, INC.	\$100.00	10/18/2012
KNAPP FARMS, INC.	\$100.00	10/18/2012
FAR WEST AGRIBUSINESS ASSOCIATION PARTNERSHIP	\$300.00	10/18/2012
INTEGRATED FARMS, LLC	\$100.00	10/19/2012
SNACK FOOD ASSOCIATION	\$10,000.00	10/19/2012
TROY SMITH	\$100.00	10/19/2012
CARGILL, INC.	\$24,616.94	10/9/2012
STARLITE MEDIA LLC	\$41,785.00	10/10/2012
CARGILL, INC.	\$882.14	10/17/2012
GROCERY MANUFACTURERS ASSOCIATION	\$85,000.00	10/20/2012
MONSANTO COMPANY	\$2,540.98	10/20/2012
CONAGRA FOODS	\$100,000.00	10/22/2012
MARS INCORPORATED	\$121,700.00	10/22/2012
FARIBAULT FOODS, INC.	\$10,000.00	10/25/2012
BRUCE FOODS CORPORATION	\$6,700.00	10/26/2012
HERSHEY COMPANY	\$25,000.00	10/26/2012
HORMEL FOODS CORPORATION	\$93,600.00	10/26/2012
SUNNY DELIGHT BEVERAGES COMPANY	\$20,000.00	10/26/2012
E.I. DUPONT DE NEMOURS & CO.	\$500,000.00	10/29/2012
BUMBLE BEE FOODS, LLC	\$52,100.00	10/31/2012
CAMPBELL SOUP COMPANY	\$98,000.00	10/31/2012
GENERAL MILLS, INC.	\$95,000.00	10/29/2012

THE J.M. SMUCKER COMPANY	\$70,000.00	10/29/2012
LAND O'LAKES, INC.	\$50,000.00	10/31/2012
MONDELEZ INTERNATIONAL	\$74,000.00	10/31/2012
NESTLE USA, INC. AND AFFILIATED ENTITIE	\$146,000.00	10/31/2012
OCEAN SPRAY CRANBERRIES, INC.	\$22,000.00	10/31/2012
RICH PRODUCTS CORPORATION	\$18,000.00	10/29/2012
UNILEVER	\$95,000.00	10/31/2012
POST FOODS, LLC	\$5,150.00	11/1/2012
COCA-COLA NORTH AMERICA	\$235,000.00	11/1/2012
KRAFT FOOD GROUP	\$50,000.00	11/5/2012
PEPSICO, INC.	\$340,000.00	11/5/2012
CARGILL, INC.	\$9,900.00	11/6/2012
ABBOTT NUTRITION	\$100,000.00	11/13/2012
PCS ADMINISTRATION (USA) INC. (ALSO KI	\$2,000.00	10/22/2012
CROPLIFE AMERICA	\$4,500.00	10/22/2012
CARGILL, INC.	\$4,350.00	10/25/2012
MONSANTO COMPANY	\$1,000,000.00	10/26/2012
TOM MORGAN	\$150.00	10/29/2012
OHIO AGRIBUSINESS ASSOCIATION	\$350.00	10/29/2012
BIOTECHNOLOGY INDUSTRY ORGANIZATIO	\$250,000.00	11/1/2012
CARGILL, INC.	\$1,100.00	11/7/2012
CARGILL, INC.	\$575.00	12/26/2012
MONSANTO COMPANY	\$2,032.00	10/24/2012
CARGILL, INC.	\$2,039.40	10/29/2012
MONSANTO COMPANY	\$1,913.94	10/29/2012
GROCERY MANUFACTURERS ASSOCIATION	\$1,500,000.00	10/26/2012

Exhibit E

Crossover Expenses

No on 522 (WA) & No on 37 (CA)

WINNER & MANDABACH CAMPAIGNS

No on 522 \$ 565,402.00

No on 37 \$ 36,824,230.40

AMPLIFIED STRATEGIES

No on 522 \$ 142,665.00

No on 37 \$ 4,847,515.00

BICKER CASTILLO & FAIRBANKS

No on 522 \$ 121,277.39

No on 37 \$ 748,985.67

NORTHBRIDGE ENVIRONMENTAL MANAGEMENT CONSULTANTS

No on 522 \$ 16,307.50

No on 37 \$ 97,371.95

Exhibit F

NO_{ON} 37

**STOP THE DECEPTIVE
FOOD LABELING SCHEME**

July 31, 2012

Mr. David Bienstock
Target Enterprises LLC
15260 Ventura Blvd., Suite 1240
Sherman Oaks, CA 91403

Dear David,

My firm, Winner & Mandabach Campaigns, is managing the campaign to defeat California Proposition 37, dealing with the labeling of food products. Our ballot advocacy group for this is called the NO on 37 Coalition for short. The full name is NO on 37: Coalition Against the Deceptive Food Labeling Scheme, sponsored by Farmers, Food Producers, and Grocers. Co-Chairs Louis Finkel and Ab Basu. Treasurer, Thomas W. Hiltachk

This letter is to confirm that Target Enterprises has been selected to make all of the paid media buys for our campaign.

More information about the Prop 37 and our campaign is available on our campaign website at www.NoProp37.com.

Please let me know if you need any additional information.

Best regards,



Robert C. Deis
Senior Vice President
Winner & Mandabach Campaigns

**Paid for by NO on 37: Coalition Against the Deceptive Food Labeling Scheme, sponsored by
Farmers, Food Producers, and Grocers. Major funding by Council for Biotechnology Information
and Grocery Manufacturers Association.**

1121 L. Street, #803, Sacramento, CA 95814 - 1.800.331.0850 - www.NoProp37.com

TAX ID - 45-4445063

Exhibit G

Grocery Manufacturers Association Appoints Louis Finkel Executive Vice President, Government Affairs

Issues and Policy Leadership News Release

2/29/2012

GMA Press Contact	
Ginny Smith	mobile: 202-295-
office: 202-639-5900 3937 (tel:2022953937)	
(tel:2026395900)	gsmith@gmaonline.org
	(mailto:gsmith@gmaonline.org)

WASHINGTON, DC - Grocery Manufacturers Association (GMA) President and CEO Pamela G. Bailey today announced the appointment of Louis A. Finkel as Executive Vice President of Government Affairs.

"I am pleased to welcome Louis Finkel to the GMA team," said Ms. Bailey. "He is an effective leader, advocate and policy expert that will help GMA and its member companies continue to develop, promote and implement responsible public policy solutions that benefit consumers and that also make the world a better place.

"Louis is a trusted and respected advocate who has built strong relationships on both sides of the aisle in pursuit of public policy goals. His professional, bi-partisan approach to policymaking is the right fit for GMA. He is also a seasoned strategist and an effective communicator that knows how to develop and motivate high performing teams," concluded Bailey.

Mr. Finkel has 19 years experience on Capitol Hill, working inside and outside of government. He served as chief of staff for the U.S House of Representatives Committee on Science and Technology, which was chaired by Representative Bart Gordon (D-TN). In that role, he advanced the committee's legislative and oversight agenda and helped modernize and transform the committee through effective organizational and personnel management policies.

He currently serves as vice president, federal public affairs group, at McGuireWoods Consulting, LLC, where he represents corporate, trade association and not-for-profit clients before Congress and executive branch agencies. He specializes in food, hunger, agriculture, energy, technology, telecommunications, environmental, health care, trade and tax policy issues.

Mr. Finkel also previously served in the government relations office of Exxon Mobil. In that capacity, he represented the company before Congress and conducted policy analysis, political intelligence-gathering and strategic planning on matters of policy, politics and government relations activities.

He has also worked in the firm Lent, Scrivner & Roth, LLC, as legislative director and senior legislative assistant to Representative Bart Gordon (D-TN), and as legislative assistant and staff assistant to Representative Peter Deutsch (D-FL).

"I am honored, thrilled, and humbled to be joining GMA," said Mr. Finkel. "GMA's members include some of the most admired, respected and responsible companies in the world and I look forward to working with the association staff and its member companies to advance the consumer packaged goods industry agenda."

Mr. Finkel will report to GMA President and CEO Pamela Bailey, and will serve as a member of the GMA Senior Leadership Team. In his new role, he will direct the association's federal and state and local government relations activity. He will assume his new job on April 9.

###

Based in Washington, D.C., the Grocery Manufacturers Association is the voice of more than 300 leading food, beverage and consumer product companies that sustain and enhance the quality of life for hundreds of millions of people in the United States and around the globe.

Founded in 1908, GMA is an active, vocal advocate for its member companies and a trusted source of information about the industry and the products consumers rely on and enjoy every day. The association and its member companies are committed to meeting the needs of consumers through product innovation, responsible business practices and effective public policy solutions developed through a genuine partnership with policymakers and other stakeholders.

In keeping with its founding principles, GMA helps its members produce safe products through a strong and ongoing commitment to scientific research, testing and evaluation and to providing consumers with the products, tools and information they need to achieve a healthy diet and an active lifestyle. The food, beverage and consumer packaged goods industry in the United States generates sales of \$2.1 trillion annually, employs 14 million workers and contributes \$1 trillion in added value to the economy every year.

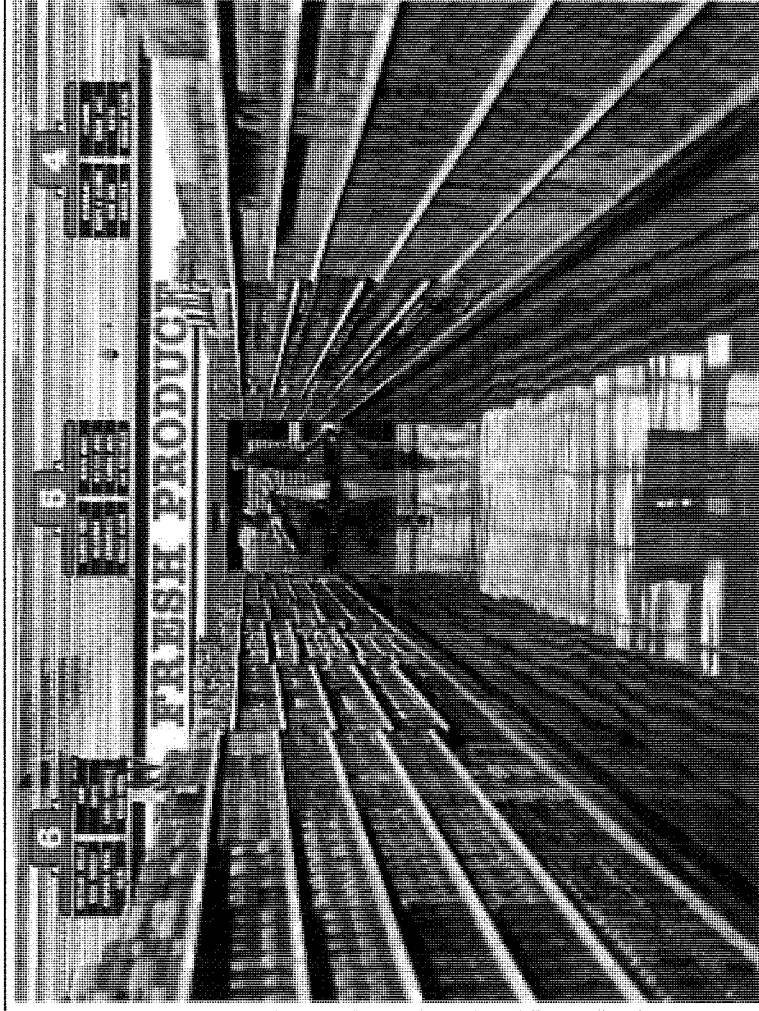
© 2010 Grocery Manufacturers Association
1350 I (Eye) Street, Suite 300
Washington, DC (District of Columbia) 20005
ph: (202) 639-5900 ::fx: (202) 639-5932
info@gmaonline.org

Exhibit H

WINNER & ASSOCIATES

Milestones

[Click on a Client for Further Information](#)



Grocery Manufacturers of America 1981 - Present

Over the years, W&A has successfully represented GMA in various states throughout the country on a variety of matters including legislation dealing with labeling, repackaging, and tax issues.

In collaboration with affiliated firm Winner & Mandabach Campaigns, W&A has helped GMA win ballot measure campaigns pertaining to similar issues.

[← PREVIOUS](#) | [NEXT →](#)

[←← RETURN TO TIMELINE](#)

Exhibit I



HOME PUBLIC RESOURCES FILER RESOURCES SEARCH THE DATABASE VIEW ACTUAL REPORTS ONLINE FILING

ELECTION TOTALS CANDIDATES COMMITTEES INDEPENDENT EXPENDITURES LAST MINUTE CONTRIBUTIONS LOBBYING ADVANCED

CASH CONTRIBUTIONS INKIND CONTRIBUTIONS EXPENDITURES

Inkind Contributions for: **NO ON 522** [Contact Information](#) [C1PC Report](#)

Total Raised: \$17,174,220.05 Total Spent: \$13,530,110.33

(Cash Contributions (Inkind Contributions (Anonymous (Loans (Miscellaneous (Small Contributions

\$17,160,879.00 \$68,181.05 \$0.00 \$0.00 \$100.00 \$60.00

NOTE: Click on a column header to sort by that column, or click on the icon to filter your results



0

Drag a column header and drop it here to group by that column

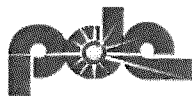
Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation	Description
Report	COUNCIL FOR BIOTECHNOLOGY INFORMATION	3/20/2013	\$27,500.00	N	WASHINGTON	DC	20024			FM3: PUBLIC OPINION RESEARCH POLL.
Report	GROCERY MANUFACTURERS ASSOCIATION	3/20/2013	\$27,500.00	N	WASHINGTON	DC	20005			FM3: PUBLIC OPINION RESEARCH POLL.
Report	WASHINGTON FARM BUREAU	10/14/2013	\$1,700.00	N	OLYMPIA	WA	98516			MEETINGS AND STAFF TIME
Report	WASHINGTON FARM BUREAU	6/30/2013	\$1,510.00	N	OLYMPIA	WA	98516			MEETING, STAFF TIME AND TRAVEL.
Report	WASHINGTON FARM BUREAU	5/31/2013	\$1,400.00	N	OLYMPIA	WA	98516			MEETING, STAFF TIME AND TRAVEL.
Report	NORTHWEST GROCERY ASSOCIATION	10/14/2013	\$1,330.80	N	WILSONVILLE	OR	97070			STAFF TIME
Report	NORTHWEST FOOD PROCESSORS ASSOCIATION	9/30/2013	\$1,242.80	N	PORTLAND	OR	97220			MEETINGS, STAFF TIME AND TRAVEL.
Report	WASHINGTON BIOTECHNOLOGY AND BIOMEDICAL ASSOCIATION	5/31/2013	\$800.00	N	SEATTLE	WA	98102			MEETING AND STAFF TIME
Report	WASHINGTON ASSOCIATION OF WHEAT GROWERS	9/6/2013	\$737.25	N	RITZVILLE	WA	99169			DISCOUNTED PRINT ADVERTISING.
Report	WASHINGTON BIOTECHNOLOGY AND BIOMEDICAL ASSOCIATION	9/25/2013	\$500.00	N	SEATTLE	WA	98102			MEETINGS AND STAFF TIME
Report	WASHINGTON BIOTECHNOLOGY AND BIOMEDICAL ASSOCIATION	4/30/2013	\$500.00	N	SEATTLE	WA	98102			MEETING AND STAFF TIME
Report	FAR WEST AGRIBUSINESS ASSOCIATION	5/31/2013	\$329.86	N	SPOKANE	WA	99224			CONFERENCE ROOM, MEETING AND STAFF TIME
Report	WASHINGTON RETAIL ASSOCIATION	10/14/2013	\$315.00	N	OLYMPIA	WA	98501			MEETINGS AND STAFF TIME
Report	NORTHWEST FOOD PROCESSORS ASSOCIATION	7/31/2013	\$300.00	N	PORTLAND	OR	97220			MEETING, STAFF TIME AND TRAVEL.
Report	NORTHWEST FOOD PROCESSORS ASSOCIATION	4/30/2013	\$300.00	N	PORTLAND	OR	97220			MEETING, TRAVEL AND STAFF TIME

1 2

Displaying items 1 - 15 of 30

HOME / PRIVACY NOTICE / EMPLOYMENT / SITE MAP

PUBLIC DISCLOSURE COMMISSION / 711 CAPITOL WAY #206 / PO BOX 40908 / OLYMPIA, WA 98504-0908
 TOLL FREE - 1-877-601-2828 / PHONE 360-753-1111 / FAX (360)753-1112 / EMAIL pdc@pdc.wa.gov
 OFFICE HOURS: 8:00AM - 5:00PM Monday - Friday Closed Weekends & State Holidays.



Public Disclosure Commission
Shining Light on Washington Politics

HOME PUBLIC RESOURCES FILER RESOURCES SEARCH THE DATABASE VIEW ACTUAL REPORTS ONLINE FILING

ELECTION TOTALS CANDIDATES COMMITTEES INDEPENDENT EXPENDITURES LAST MINUTE CONTRIBUTIONS LOBBYING ADVANCED

CASH CONTRIBUTIONS INKIND CONTRIBUTIONS EXPENDITURES

Cash Contributions for: **NO ON 522** [Contact Information](#) [C1PC Report](#)

Total Raised: \$17,174,220.05 Total Spent: \$13,530,110.33

(Cash Contributions (Inkind Contributions (Anonymous (Loans (Miscellaneous (Small Contributions
\$17,160,879.00 \$68,181.05 \$0.00 \$0.00 \$100.00 \$60.00

NOTE: Click on a column header to sort by that column, or click on the icon to filter your results



1

Drag a column header and drop it here to group by that column

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	DOW AGROSCIENCES LLC	5/2/2013	\$29,531.25	N	INDIANAPOLIS	IN	46268		
Report	MONSANTO	5/3/2013	\$242,156.25	N	ST. LOUIS	MO	63167		
Report	GROCERY MANUFACTURERS ASSOCIATION	5/8/2013	\$472,500.00	N	WASHINGTON	DC	20005		
Report	BAYER CROPSCIENCE	5/9/2013	\$29,531.25	N	RESEARCH TRIANGLE PK	NC	27709		
Report	DUPONT PIONEER	5/21/2013	\$171,281.25	N	JOHNSTON	IA	501310184		
Report	GROCERY MANUFACTURERS ASSOCIATION	8/23/2013	\$1,750,000.00	N	WASHINGTON	DC	20005		
Report	BAYER CROPSCIENCE	8/26/2013	\$562,123.00	N	RESEARCH TRIANGLE PK	NC	27709		
Report	MONSANTO	9/5/2013	\$4,592,255.00	N	ST. LOUIS	MO	63167		
Report	DUPONT PIONEER	9/10/2013	\$3,248,878.00	N	JOHNSTON	IA	501310184		
Report	WARDENAAR RAY	9/18/2013	\$250.00	N	OTHELLO	WA	99344	SELF-EMPLOYED	GROWER/PACKER
Report	BASF PLANTSCIENCE	9/19/2013	\$500,000.00	N	RESEARCH TRIANGLE PK	NC	27709		
Report	HAUNTY NANCY	9/19/2013	\$100.00	N	SHORELINE	WA	98177		
Report	DOW AGROSCIENCES LLC	9/24/2013	\$562,123.00	N	INDIANAPOLIS	IN	46268		
Report	GROCERY MANUFACTURERS ASSOCIATION	9/27/2013	\$5,000,000.00	N	WASHINGTON	DC	20005		
Report	BORTZ JOHN	10/11/2013	\$100.00	N	SPOKANE	WA	99208		

1 2

Displaying items 1 - 15 of 16

HOME / PRIVACY NOTICE / EMPLOYMENT / SITE MAP

PUBLIC DISCLOSURE COMMISSION / 711 CAPITOL WAY #206 / PO BOX 40908 / OLYMPIA, WA 98504-0908
TOLL FREE - 1-877-601-2828 / PHONE 360-753-1111 / FAX (360)753-1112 / EMAIL pdc@pdc.wa.gov
OFFICE HOURS: 8:00AM - 5:00PM Monday - Friday Closed Weekends & State Holidays.

