

## State of Washington PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 (360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

October 7, 2020

Delivered electronically to David Blomstrom at "one@governor5.com"

Subject: Complaints filed by Laurie E. Euler, Sarah E. Zarrow & Glen Morgan, PDC Case 74124

Dear Mr. Blomstrom:

Below is a copy of an electronic letter sent to Laurie Euler, Sarah Zarrow and Glen Morgan concerning complaints filed with the Public Disclosure Commission (PDC).

As noted in the letter to Ms. Euler, Ms. Zarrow and Mr. Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of including sponsor identification on all written political advertisements and party preference on all political ads. PDC staff expects in the future that you will take steps to ensure that your campaign advertisements include any required sponsor identification and party preference in accordance with PDC laws and rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,	Endorsed by,
Electronically signed	Electronically signed
Jennifer Hansen	Barbara Sandahl
Compliance Officer	Deputy Director
	For Peter Lavallee
	Executive Director



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October 7, 2020

Delivered electronically to Laurie E. Euler at "lauriebetheuler@gmail.com", Sarah E. Zarrow at "sarah.zarrow@gmail.com" & Glen Morgan at "glen@wethegoverned.com"

Subject: Complaint regarding David Blomstrom, PDC Case 74124

Dear Ms. Euler, Ms. Zarrow & Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaints filed by Laurie Euler on July 23, 2020, Sarah Zarrow on July 24, 2020 and Glen Morgan on July 29, 2020. As all three complaints included allegations concerning the same mailer, PDC staff combined the complaints and investigated the allegations under PDC Case 74124. The complaints alleged that David Blomstrom, a gubernatorial candidate in the 2020 election, may have violated: (1) RCW 42.17A.320 and WAC 390-18-010 for failure to disclose sponsor identification on written political advertisement; (2) RCW 42.17A.320(1) for failure to include party preference on written political advertisement; and (3) RCW 42.17A.235 and .240, and WAC 390-16-125 for exceeding mini-reporting limitations without prior authorization from the PDC.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by David Blomstrom ("the Respondent"); and the applicable PDC reports filed by the Respondent, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On March 13, 2020, David Blomstrom filed a Candidate Registration (C-1 report) declaring candidacy for governor in the November 3, 2020 general election, choosing the "Mini Reporting" option, and identifying his party preference as "Fifth Republican Party". Mr. Blomstrom has been a declared candidate at least five times in the last twelve years, including two previous runs for governor. Mr. Blomstrom has consistently utilized the "Mini Reporting" option and has identified his preference as "Fifth Republican Party" on his C-1 reports, when applicable.
- RCW 42.17A.320 requires written political advertisements to identify the sponsor of the ad in the manner further described in WAC 390-18-010. RCW 42.17A.320 also states that, for partisan office, if a candidate has expressed a party or independent preference on the declaration of candidacy, that party or independent designation shall be clearly identified in political advertising.

- The complaints included a copy of a two-sided color postcard sent to voters on July 10, 2020 and alleged that the postcard was political advertisement but failed to include the required sponsor identification and party preference.
- In his response, Mr. Blomstrom stated that the primary reason for the creation of the postcard was to advertise a book he had recently written and to direct the reader to a website where he included additional information about his personal views and other books he had authored. Mr. Blomstrom stated that he purposely included the statement "Jew Flu's author is a candidate for Washington State Governor. Curious?" and then listed the URL's of his book website and his campaign website to prove that he really was a gubernatorial candidate.
- During a review of the postcard, staff found that almost the entire content was related to Mr. Blomstrom's books and his personal opinions. Mr. Blomstrom's initial response indicated that he was not aware of the complete definition of political advertisement and the requirement to include sponsor identification and party preference.
- Mr. Morgan's complaint included an additional allegation that Mr. Blomstrom exceeded the Mini Reporting dollar limit of \$5,000 in total expenditures.
- In his response, Mr. Blomstrom stated that did not spend more than \$5,000 during the campaign including specific costs connected to the creation and mailing of the postcard. Upon staff's request, Mr. Blomstrom provided documentation confirming that he spent \$550.61 to purchase the mailing lists used to address his mailer and \$2,152.33 for printing and postage.

Based on the documentation provided by Mr. Blomstrom detailing his 2020 gubernatorial campaign expenses, staff found no evidence that the campaign exceeded the Mini Reporting dollar amount thresholds.

Although Mr. Blomstrom is not a first-time candidate, it appears that the creation and mailing of this specific postcard was mistakenly viewed by him as advertisement for his book only and not as a comprehensive political advertisement. Furthermore, Mr. Blomstrom's campaign history shows that he has not engaged in this type of advertising in the past and had little knowledge about the requirements at the time he chose the ad language.

Based on our findings staff has determined that, in this instance, failure to include sponsor identification and party preference on political advertisement, does not amount to a finding of a violation that warrants further investigation.

PDC staff is reminding Mr. Blomstrom about the importance of including the full sponsor on all future written political advertisement and party preference on all political ads in accordance with PDC statutes and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely, Endorsed by,

Electronically signed Electronically signed

Jennifer Hansen

Compliance Officer

Barbara Sandahl

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cc: David Blomstrom