

KATE BROWN
SECRETARY OF STATE



JIM WILLIAMS
DIRECTOR
255 CAPITOL STREET NE, SUITE 501
SALEM, OREGON 97310-0722
(503) 986-1518

May 13, 2014

Citizens for Jim Thompson
Jim Thompson, Candidate
3380 Mistletoe Rd
Dallas OR 97338

Case No. 14-C&E-15

Dear Representative Thompson:

This is to notify you that a written complaint alleging a possible violation of Oregon Election Law was received by the Elections Division on May 9, 2014. A copy of the complaint letter is enclosed.

Please review the complaint and send us a written response to the allegation in the letter within 10 days of the date of this letter, and feel free to include any documentation or other data which may help to support or explain your position, and response to the complaint. We may request additional information through a letter of inquiry. Please contact me at 503-986-1518 if you have any questions about the contents of this letter.

Sincerely,

Jennifer Hertel
Compliance Specialist

c: Mike Nearman
Carol Russell, Treasurer of Citizens for Jim Thompson
Angelique Conley, Correspondence Recipient of Citizens for Jim Thompson
Lori Piercy, Treasurer of Conservative Republican Defense Fund
Senator Larry George, Director of Conservative Republican Defense Fund
Senator Brian Boquist
Jonathan Thompson



May 9, 2014

The Honorable Kate Brown
Secretary of State
Elections Division
255 Capitol Street NE, Suite 501
Salem, Oregon 97310-0722

RECEIVED
2014 MAY 9 PM 3 30
KATE BROWN
SECRETARY OF THE STATE

Re: Complaint – Campaign Finance and Election Law Violations
Citizens for Jim Thompson, ID: 4681
Conservative Republican Defense Fund, ID: 16878

Dear Elections Division:

We write to report on and seek immediate redress of campaign finance and election law violations by the following campaign committees: *Citizens for Jim Thompson* (ID: 4681) and *Conservative Republican Defense Fund* (ID: 16878).

With respect to *Citizens for Jim Thompson*, the committee failed to timely file a \$9,000 in-kind contribution by Rick Thomas (Transaction ID: 1709615). The filed transaction states the in-kind contribution was for services and consulting and that the transaction date was 25 April 2014. Based on information and public knowledge, Mr. Thomas began providing consulting services on or about 15 March 2014. Consequently, the in-kind contribution filing should have been filed earlier and, because it was not, the committee violated campaign finance regulations.

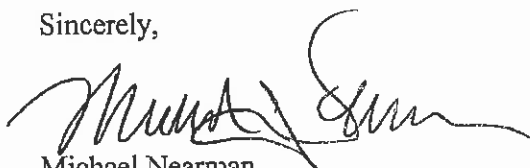
With respect to *Conservative Republican Defense Fund*, the committee only shows one contribution of \$100 on 16 April 2014 (Transaction ID: 1702424). It records no other expenses or contributions. The attached exhibits show that the committee has sent negative campaign materials against our campaign. However, the expenditures for such mailings have not been properly filed by the committee, thus violating campaign finance regulations.

Further, based on information and public knowledge, the *Conservative Republican Defense Fund* committee was formed for the sole purpose of attacking our campaign and it is doing so in coordination with State Senator Brian Boquist, State Senator Larry George, and Jonathan Thompson. Not only are Boquist, George, and Jonathan Thompson coordinating with *Conservative Republican Defense Fund*, but they are also coordinating with *Citizens for Jim*

Thompson. Boquist, George, and Jonathan Thompson directly provide consultation, communication, and campaign services to *Citizens for Jim Thompson* and via *Conservative Republican Defense Fund*. This direct coordination disqualifies their activities as independent activities and, consequently, they have violated election laws. Further, Boquist, George, and Jonathan Thompson have not properly recorded any in-kind or other contributions to *Citizens for Jim Thompson*, thus violating campaign finance laws.

We request that you investigate the violations and immediately apply the appropriate penalties for the above-mentioned violations.

Sincerely,



Michael Nearman
Nearman4Oregon

Home: 503 838 6001

Email: nearman4oregon@yahoo.com

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2014 MAY 9 PM 3 30
KATE BROWN
SECRETARY OF THE STATE

Conservative Republican Defense Fund
PO Box 276
Hubbard, OR 97032



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The Nearman Family
or Current Resident
2570 Greenwood Rd S
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WARNING

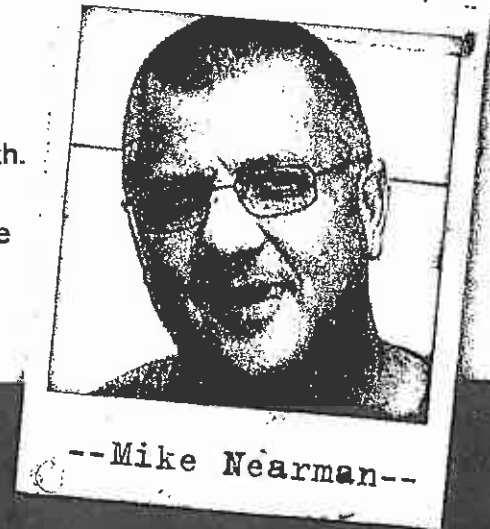
MIKE NEARMAN IS DANGEROUS TO YOUR HEALTH

Don't ignore the warning signs.

Electing Mike Nearman as our state representative is bad for our health.

Why? Because Mike Nearman thinks insurance companies should be able to deny you coverage due to pre-existing conditions and even compared people with pre-existing conditions to junk cars.

With views like that
he's the last thing we need
as our state representative.



WARNING

MIKE NEARMAN IS DANGEROUS TO YOUR HEALTH



--Mike Nearman--

Mike Nearman wants to be our state representative— but that's a dangerous proposition for our health. Why? Because he thinks insurance companies should be able to deny you coverage due to pre-existing conditions'.

Mike Nearman even compared people with pre-existing conditions to junk cars' and would force you to buy your insurance from government-run high risk pools—costing you thousands of dollars more for your coverage!

▶ Get cancer?
No insurance for you!

▶ Have a heart attack?
Too bad, so sad!

▶ Asthma?
Coverage denied!

COVERAGE DENIED

With views like that he's the last thing we need as our state representative.

MIKE NEARMAN IS BAD FOR OUR HEALTH!

Conservative Republican Defense Fund
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Hubbard, OR 97032



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Mike Nearman is Full of Bad Ideas



--Mike Nearman--

BAD IDEA #1

Let big insurance companies take away coverage for people with pre-existing conditions like heart disease, diabetes and cancer—forcing people into government-run high risk pools and costing them thousands of dollars more for health care.

BAD IDEA #2

Take credit for reducing sheriff's patrols to only 10 hours a day, seven days a week—making families less safe.

With views like these Mike Nearman is the last person we need as our state representative.

Mike Nearman's IDEA BOARD



--Mike Nearman--

NOT BAD IDEAS CONSERVATIVE IDEAS

BAD IDEAS ON HEALTH CARE

Nearman thinks that big insurance companies should be able to deny coverage to people with pre-existing conditions. If he has his way anyone with heart disease, cancer, or even asthma would have to buy insurance from government-run high risk pools—costing us thousands of dollars more for coverage. Nearman ever compared people with pre-existing conditions to junk cars.

BAD IDEAS ON PUBLIC SAFETY

Mike Nearman takes pride in the fact that he defeated a proposal to provide critical funding to local law enforcement. Thanks to Mike Nearman no deputies are patrolling our roads for 14 hours each day, seven days a week—making our communities less safe and more vulnerable to crime.

Conservative Republican Defense Fund

PO Box 276

Hubbard, OR 973032



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IT'S HARD TO STOP A VIOLENT CRIME WHEN THERE AREN'T ANY SHERIFF'S DEPUTIES PATROLLING OUR ROADS.

Because of Mike Nearman's efforts, Polk County is without sheriff's patrols 14 hours every day — making us less safe and more vulnerable to crime.

“Polk County deputies will only patrol 10 hours a day starting Saturday”

Statesman Journal, March 28, 2014

“Polk County Sheriff's Office goes to 10 hours of patrol per day”

Statesman Journal, March 25, 2014

“For 14 hours a day now, Polk County won't see a sheriff's deputy on patrol”

The Oregonian, March 26, 2014

“Sheriff Patrol Cuts Slated
Due to anticipated budget cuts and staffing changes, the Polk County Sheriff's Office will no longer be patrolling the county 24 hours per day.”

Polk County Itemizer-Observer, March 5, 2014



MIKE NEARMAN: BAD IDEAS. NOT CONSERVATIVE IDEAS.

THANKS TO

MIKE NEARMAN,

OUR FAMILIES
ARE LESS SAFE
AND MORE
VULNERABLE
TO CRIME.

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“Sheriff Patrol Cuts Stated
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longer be patrolling the county
24 hours per day”

Polk County Tenzler-Observer, March 5, 2014

Conservative Republican Defense Fund News

PO Box 276 • Hubbard, Oregon 97032

It’s hard to stop a violent crime
when there aren’t any sheriff’s
deputies patrolling our roads

Mike Nearman takes pride in the fact that he defeated a proposal to provide critical funding to local law enforcement. And what did Nearman’s “victory” mean? Today, not a single deputy is on patrol in Polk County between 10:00 p.m. and noon. No deputies are patrolling our roads for 14 hours each day, seven days a week.

Thanks to Mike Nearman, our communities
are less safe and more vulnerable to crime.

Public safety is a critical function of government but thanks to Nearman local families are at risk. Local law enforcement is reeling from the cuts and we’re losing the safety and security we deserve. His dangerous ideas aren’t conservative ideas — they are bad ideas.



MIKE NEARMAN: BAD IDEAS. NOT CONSERVATIVE IDEAS.