

CITY OF PORTLAND

In the Matter of: Violations of Campaign Contribution Limits of Portland Charter Chapter 3, Article 3, and Portland City Code Chapter 2.10

No. _____

COMPLAINT

Violations of Contribution Limits by Campaign of Jack Kerfoot

AUDITOR 12/19/19 AM11:55

1. Ronald Buel, a resident of Portland at 1810 NE 70th Avenue, files this Complaint alleging violations of the campaign contribution limits of Portland Charter Chapter 3, Article 3, and Portland City Code Chapter 2.10 ("Portland Campaign Contribution Limits") by Jack Kerfoot for Portland City Commissioner No. 4, the principal campaign committee of his campaign for that position.
2. This Complaint is pursuant to Portland Charter § 3-305.
3. Portland Charter § 3-302 provides:

3-302 Contributions in City of Portland Candidate Elections.

- (a) An Individual or Entity may make Contributions only as specifically allowed to be received in this Article.
- (b) A Candidate or Candidate Committee may receive only the following Contributions during any Election Cycle:
 - (1) Not more than five hundred dollars (\$500) from an Individual or a Political Committee other than a Small Donor Committee;
 - (2) Any amount from a qualified Small Donor Committee;

- (3) A loan balance of not more than five thousand dollars (\$5,000) from the candidate;
 - (4) No amount from any other Entity, except as provided in Section 3-304 below.
4. These contribution limits went into effect on September 1, 2019, pursuant to Portland Charter § 3-305(a).
 5. Since September 1, 2019, the Jack Kerfoot for Portland City Commissioner No. 4 Committee has received the following contributions in apparent violation of the contribution limits:

Tran Id	Date	Contributor/Payee	Amount	Aggregate Amount
3230080	08/23/2019	Jack L. Kerfoot	1,000	1,000
3232113	08/28/2019	Jack L. Kerfoot	30,000	31,000
3258187	10/07/2019	Jack L. Kerfoot	40,000	71,000
3308900	12/09/2019	Jack L. Kerfoot	35,000	106,000

6. The above-listed contributions by individuals are in excess of the \$500 per individual per election cycle limit.
7. No court has enjoined the implementation of the Portland Campaign Contribution Limits.
8. Ronald Buel requests that the City Auditor apply the fines required by Portland Charter § 3-305(b): "a civil fine which is not less than two nor more than twenty times the amount of the unlawful Contribution or Expenditure or Independent Expenditure at issue."
9. Ronald Buel requests that all correspondence to him in this matter be addressed to buel@honest-elections.com.

Dated: December 19, 2019

/s/ Ronald Buel

Ronald Buel