

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 Ted Wheeler

AUDITOR 12/19/19 AM 11:54

- 1. Ron Buel, a resident of Portland, hereby 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 Friends of Ted Wheeler, the principal campaign committee of his campaign for Mayor of Portland.
- 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, Friends of Ted Wheeler has received the following contributions in apparent violation of the contribution limits:

<b>Tran Id</b>	<b>Date</b>	<b>Contributor/Payee</b>	<b>SubType</b>	<b>Amount</b>
3305873	12/09/2019	Robert Walsh	Cash	\$ 2,500
3305831	12/08/2019	Philip Kalberer	Cash	\$ 1,000
3305832	12/08/2019	Robert Warren	Cash	\$ 5,000
3305825	12/06/2019	Mike Golub	Cash	\$ 2,000
3305830	12/06/2019	Noydena Brix	Cash	\$ 5,000
3305824	12/05/2019	Mark C. Edlen	Cash	\$ 2,500
3305835	12/03/2019	Thomas Cody	Cash	\$ 1,000
3303569	12/01/2019	Melvin Mark Brokerage Co.	In-Kind	\$ 1,278
3305833	11/26/2019	John Andrews	Cash	\$ 2,500
3294168	11/22/2019	Peter Brix	Cash	\$ 5,000
3294165	11/21/2019	William R Swindells	Cash	\$ 2,500
3289621	11/14/2019	Mark Madden	Cash	\$ 5,000
3282206	11/01/2019	Melvin Mark Brokerage Co.	In-Kind	\$ 1,278
3261443	10/01/2019	Melvin Mark Brokerage Co.	In-Kind	\$ 1,278
3248929	09/13/2019	Melvin Mark Brokerage Co.	In-Kind	\$ 2,210.94

6. The above-listed contributions by individuals are in excess of the \$500 per individual per election cycle limit.
7. The above-listed contributions by corporations violate the prohibition on contributions by all entities other than Political Committees and Small Donor Committees.
8. Friends of Ted Wheeler was notified of these violations on December 11, 2019. It was notified of the need to comply with the Portland Campaign Contribution Limits on November 1, 2019.

9. No court has enjoined the implementation of the Portland Campaign Contribution Limits.
10. 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."
11. Ronald Buel requests that the City Auditor conduct an audit of all contributions of \$100 or less received by Friends of Ted Wheeler to ensure that only qualified contributions are being reported under that label.
12. Ronald Buel requests that all correspondence to him in this matter be addressed to [buel@honest-elections.com](mailto:buel@honest-elections.com).

Dated: December 19, 2019

*/s/ Ronald Buel*

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Ronald Buel