



August 13, 2020

City of Portland Auditor's Office
1221 SW 4th Avenue
Room 130
Portland, OR 97204

RE: Campaign Regulations Complaint: 2020-28-L48

Dear City of Portland Auditor's Office,

I am sending this formal written response on behalf of our President and Treasurer, Wayne Chow, of the Local 48 Electricians PAC in response to the complaint 2020-28-L48 that was filed on July 28, 2020. This complaint is alleging campaign disclosure violations of the Portland City Charter Section 3-301, "Contributions in the City of Portland Candidates Elections."

I do not believe that Local 48 Electricians PAC was in violation of the Portland City Charter Section 3-301 and that we should not be named in this complaint. On page 2 of the complaint it states that we made an in-kind contribution on June 10, 2020 that was reported in ORESTAR on June 17, 2020 in the amount of \$9,111.95. At this time there were no other contributions reported and we were well within the \$20,000.00 contribution limit. On June 26, 2020 UFCW contributed \$15,000.00, which was reported in ORESTAR on June 30, 2020. It is this contribution that put Loretta Smith's campaign in possible excess of the \$20,000.00 limit and was a possible violation.

I would also like to mention that the \$9,111.15 in-kind contribution that we made was for printing and mailing expenses incurred during the Primary Election. Therefore, it is my understanding that this in-kind contribution would be applied to the Primary Election \$20,000.00 limit and not the General Election \$20,000.00.

Our Staff and Officers of IBEW Local 48 work very diligently to remain in compliance and we do not believe that we were in violation of this in-kind contribution.

Please contact me direct by phone or email, should you have questions or need further clarification. I have also included a copy of the invoice that was paid and a snapshot of the check that was written.

I thank you in advance for you time and consideration to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Garth Bachman", written over a white background.

Garth Bachman
Business Manager
Financial Secretary

Gb:tp
OPEIU#11/AFL-CIO



Invoice

4824 NE 42nd Ave.
Portland, OR 97218

Date	Invoice #
6/10/2020	20-4391

Bill To
IBEW Local 48 15937 NE Airport Way Portland, OR 97230

Ship To

Accura #	Customer PO #	Terms	Rep	Ship Date	Ship Via	Morel PO #
		Due on r...	SB	4/22/2020		141746SB

Quantity	Item Code	Description	Price Each	Amount
1	Printing 1 - I...	Loretta Smith for Portland Mailpiece	9,111.95	9,111.95
		Out-of-state sale, exempt from sales tax	0.00%	0.00

		Total	\$9,111.95
Phone #	5037360111	Payments Applied	\$0.00
		Balance Due	\$9,111.95

TERMS: Interest at rate of 1 1/2% per month after 30 days of invoice date. Annual percentage rate is 18%. In the event of suit for collection, customer agrees to pay attorney fees as fixed by the court.

Payment ◀ ▶

LOCAL 48 ELECTRICIANS PAC

Check/Reference No.: 2807

Date: Jun 10, 2020

Vendor ID

Nine Thousand One Hundred Eleven and 95/100 ***** Dollars \$ 9,111.95

Pay to the order of:

Mail To
 4824 NE 42nd Avenue
 Address Line 2
 PORTLAND OR 97218
 Country

Payment method:

Memo:

Cash account

 Credit Union Ckg 330535-025

Cash account balance \$

Apply to Invoices: 0.00

Apply to Expenses: 9,111.95

Prepayment

Quantity	Item	Description	GL Account	Unit Price	Amount	Job
			8000	0.00	9,111.95	