

October 10, 2018

Ronald Bersin
Executive Director
Oregon Government Ethics Commission
3218 Pringle Rd. SE, Suite 220
Salem, OR 97302-1544

Dear Mr. Bersin,

I am filing a complaint against Governor Brown for violating state ethics laws (ORS 244.042) by using state money for campaign purposes and for possible influence peddling (ORS 244.040). I am requesting that the Oregon Government Ethics Commission investigate this complaint immediately, so voters have full transparency prior to the November election.

Multiple sources have now detailed troubling behavior by Governor Brown, and most recently, on October 8th, 2018, her campaign manager was caught on video claiming she used state funds to campaign while he worked for her. The articles of reference are listed below.

Forbes magazine reported that Governor Brown had the state pay \$8,277 in travel expenses for a trip to Colorado from May 9th-11th, 2018. It is unclear what official state business was conducted during this trip. The Governor gave a commencement speech at her alma mater (The University of Colorado Boulder). During this trip, the Governor had ten campaign events listed on her official calendar. These expenses should be investigated to determine why Oregon taxpayers were charged for campaign events and what appears to be a personal trip. We've attached receipts and documentation obtained by Forbes to our complaint form.

In addition, the Governor billed the state for \$11,984 for a trip to Washington, DC from Feb 22nd-25th, 2018. During this trip, the Governor scheduled twelve campaign events and arrived two days before the National Governors Association conference. Based on the receipts, Oregon taxpayers paid for the Governor's hotel, lodging, food, and transportation during her visit in Washington. There was no separation between campaign activity and official business. We've attached receipts and documentation from this trip to the complaint form.

There are other expenses billed to Oregon taxpayers that require some investigation. Forbes reports that Brown billed the state for a trip to Seattle where she had four campaign events on February 2nd, 2018. There is no separation of expenses from official business and based on the receipts it appears that taxpayers funded the entire trip.

We would also like the ethics commission to look into an article from Forbes that reported over \$518,203 in campaign donations to the Governor from state contractors. The report found that these companies have millions of dollars in state business contracts. Here is an excerpt from the article along with a link:

- **Markowitz Herbold PC** - \$25,084 in campaign donations to the governor and AG. Separately, the firm received new and amended state contracts valued at \$13 million from 2013-2015.
- **Orrick, Herrington & Sutcliffe LLP** - \$16,331 in campaign donations to the governor and AG. Separately, the firm held state contracts worth a lifetime value of \$2.995 million.

- **Stoll, Stoll, Berne, Lokting & Shalchter PC** - \$15,617 in campaign donations to the governor and AG. Separately, the firm held contracts worth a lifetime value of \$2.71 million.
- **Tonkon Torp LLP** - \$6,560 in campaign donations to the governor and AG. Separately, the firm held contracts worth a lifetime value of \$2 million.
- **Ball Janik LLP** - \$4,600 in campaign donations to the governor and AG. Separately, the firm held state contracts worth \$1.11 million over their lifetime that were initiated, modified, or amended during 2011-2015.

Link to full article: <https://www.forbes.com/sites/adamandrzejewski/2017/02/13/blazing-the-oregon-trail-of-pinstripe-patronage-gov-kate-brown-attorney-general-ellen-rosenblum/#21fedc34402d>

This information should be investigated for possible influence pending. While Oregon lawmakers can accept campaign funds from government contractors, it could violate sections of ORS Chapter 244. Especially, if these contributions are made and accepted with the goal of impacting public decisions.

Finally, a recent report by Project Veritas Action has revealed some alarming claims from Governor Brown's former 2016 campaign manager Michael Kolenc. Mr. Kolenc raises several concerns to Project Veritas that back up the reporting by Forbes, including chronic misuse of public funds. Mr. Kolenc says that there was virtually no effort made to separate public versus private expenditures in addition to people intertwining their government and campaign roles.

For further reading on this information, please see links to the articles below:

- <https://www.wweek.com/portland/blog-32756-kate-brown-draws-heat-after-shilling-for-comcast.html>
- https://www.oregonlive.com/mapes/index.ssf/2015/01/as_comcast_critics_pounce_kate.html
- <https://www.forbes.com/sites/adamandrzejewski/2018/09/14/is-oregon-governor-kate-brown-asking-taxpayers-to-fund-her-re-election-campaign/#5dfce9357210>
- <https://www.forbes.com/sites/adamandrzejewski/2018/05/24/the-good-life-of-oregon-governor-kate-brown/#309dc3dc62a9>
- <https://www.projectveritasaction.com/2018/10/08/secrets-and-lies-oregon-governor-kate-brown-misuse-of-public-funds-conflicts-of-interest-graft-corruption/>
- <https://www.forbes.com/sites/adamandrzejewski/2018/05/17/the-redacted-transparency-promise-of-oregon-governor-kate-brown/#2bff062f5dba>

Sincerely,

Bill Currier
Chair, Oregon Republican Party