

Bill Currier  
Oregon Republican Party  
25375 SW Parkway Ave, Suite 200  
Wilsonville, OR 97070

10/23/2018

Oregon Secretary of State  
Public Service Building Suite 501  
255 Capitol St. NE  
Salem, OR 97310

Dear Oregon Secretary of State,

We are submitting a formal complaint today because it has come to our attention that the independent expenditure political action committee (PAC) "Oregon South Coast Voices" has not reported any expenditures, however this PAC has been running political ads in House District 9 for over a week which would inevitably result in campaign expenditures that would have to be reported. The PAC's donating to "Oregon South Coast Voices" share the same treasurer and address. This is a likely indicator of multiple major campaign finance violations. Additionally, "Oregon South Coast Voices" PAC has paid for and published an online video advertisement that's identical to the one paid for and run on television by the "Caddy McKeown for Representative" PAC - however, neither PAC has filed this as an in-kind contribution. This appears to be an attempt to conceal activity by the "Oregon South Coast Voices" PAC which is directly benefiting Caddy McKeown's campaign.

The following appear to be in violation of Oregon Campaign Finance Law:

1. Transaction 3017505 a donation from Service Employees International Union's (SEIU) CAPE PAC (1730 Commercial St SE. Salem, OR 97302) dated on 10/11/2018 of the amount of \$10,000. "Oregon South Coast Voices" PAC reported the donation received on 10/14/2018 and publicly 10/22/18. The CAPE PAC is managed by C&E Systems Owned by Jef A Green as stated in Orestar transaction 3033327 and listed on C&E Systems website <http://www.c-esystems.com/>. "Oregon South Coast Voices" PAC's listed treasurer is Jef A Green. This is reported late.
2. Transaction 3027596 a donation from Oregon Orthopedic Political Action Committee (3321 SE 20th Avenue Portland, OR 97202) dated on 10/12/2018 of the amount of \$1,000. "Oregon South Coast Voices" PAC reported the donation received on 10/14/2018 and publicly 10/22/18. Both PACs share the same Treasurer Jef A Green and address. This is reported late.
3. Transaction 302563 a donation from Building Trades PAC (3321 SE 20th Avenue Portland, OR 97202) dated on 10/12/2018 of the amount of \$3,000. "Oregon South Coast Voices" PAC reported the donation received on 10/14/2018 and publicly 10/22/18. Both PACs share the same Treasurer Jef A Green and address. This is late.

4. Transaction 3019773 a donation from Foresight Ophthalmology Political Action Committee (3321 SE 20th Avenue Portland, OR 97202) dated on 10/12/2018 of the amount of \$1,000. "Oregon South Coast Voices" PAC reported the donation received on 10/14/2018 and publicly 10/22/18. Both PACs share the same Treasurer Jef A Green and address. This is late.
5. "Oregon South Coast Voices" also has setup a website (<http://stopgrier.com/>) and a Facebook Page (<https://www.facebook.com/StopTeriGrier/>). Both of these platforms have a 30 second video advertisement stated it is "Paid for By Oregon South Coast Voices." This is the same video advertisement that "Caddy McKeown for Representative" PAC has been running on multiple television outlets since the week of October 14th. The only difference between the ads is the Paid for line which should result in an in-kind contribution from "Caddy McKeown for Representative" PAC to "Oregon South Coast Voices" PAC for the amount of the production of the video advertisement. This expenditure is likely late as well.

I trust that your office will investigate these clear violations and attempts to evade campaign finance laws.

Sincerely,



Bill Currier