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CITY OF

**PORTLAND, OREGON**

OFFICE OF THE CITY AUDITOR

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**Gary Blackmer, City Auditor**

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## MEMORANDUM

VIA EMAIL

**Date:** March 24, 2008

**To:** John Branam  
Certified Candidate for Commissioner No. 1  
May 20, 2008 Municipal Primary Election

**From:** Andrew Carlstrom, City Elections Officer

**RE:** Request For Additional Information

Thank you for submitting the contract for Phil Busse last week, as requested.

The Auditor has examined: (1) ORESTAR transactions reported by your principal campaign committee (John4PDX); (2) media reports; and (3) the contract with Phil Busse. The Auditor is evaluating whether there have been violations of City Code. Specifically, the Auditor is concerned about potential violations of City Code Sections 2.10.090.C.5 and 2.10.090.C.6:

### **2.10.090 Limitations on Use of Qualifying Contributions, Seed Money Contributions, and Campaign Finance Fund Revenues**

...

**C. Prohibited Uses.** Revenues distributed to a Certified Candidate from the Campaign Finance Fund may not be:

...

5. Used to repay any loans, debts or penalties;
6. Used to pay for consulting services to a Person, unless the Person is providing bona fide services to the campaign and is compensated at fair market value;

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To address these concerns, the Auditor is requesting that you submit the following information to the Auditor no later than 5:00 p.m., March 28, 2008. If you submit the information electronically, please submit it to both Andrew Carlstrom and Auditor Gary Blackmer ([andrew.carlstrom@ci.portland.or.us](mailto:andrew.carlstrom@ci.portland.or.us) and [gblackmer@ci.portland.or.us](mailto:gblackmer@ci.portland.or.us)).

**Requested Information:**

- Copies of all executed contracts and agreements between you, or John4PDX, and Phil Busse
- Copies of all executed contracts and agreements between you, or John4PDX, and any other campaign staff
- Copies of any timesheets, invoices, or other documentation describing work performed
- The last date that Dustin Micheletti served as treasurer for John4PDX
- Any correspondence between you, or John4PDX, regarding any payments to Busse
- Resume for Phil Busse
- Explanation of payments to John4PDX staff, including Phil Busse, including: (1) the reason for larger payments on February 27-29, (2) the work performed for each payment, and the basis for overall compensation to each staff member, and (3) whether any Seed Money or Qualifying Contributions were used for these payments.

Thank you for your cooperation on this matter. If you have any questions regarding this Request For Additional Information after today, please direct your inquiries to Auditor Gary Blackmer at (503) 823-4808 or [gblackmer@ci.portland.or.us](mailto:gblackmer@ci.portland.or.us). I will be out of the office until March 31, 2008.