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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF WASHINGTON

OREGON SECRETARY OF STATE,

Plaintiff-Applicant,

v.

CITY RECORDER OF KING CITY,
OREGON,

Defendant-Respondent.

Case No. _____

COMPLAINT AND APPLICATION FOR
ORDER UNDER ORS 246.820

CLAIM NOT SUBJECT TO MANDATORY
ARBITRATION

ADJUDICATION REQUIRED BY
OCTOBER 30, 2023 (ORS 246.820(2))

ORS 20.140 - State fees deferred at filing

The Oregon Secretary of State files this complaint and application for an order to compel the City Recorder of King City, Oregon to comply with the Secretary’s instruction to allow circulation of petitions to recall six City Councilors under ORS 246.820(1).

In support of this application, the Secretary alleges as follows:

BACKGROUND

1.

From September 13 to September 19, 2023, Randall Olsen filed six prospective petitions, each to recall a different city counselor of King City, with the City Recorder. Mr. Olsen did so by submitting SEL 350 forms promulgated by the Secretary of State, which require a statement of reasons for the recall. (Exhibits 1–6.)

2.

The City Recorder approved the recall petitions for circulation as the filing officer for King City elections.

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3.

On October 5, the City Recorder wrote to Mr. Olsen that the “approvals of the [six recall] petitions are hereby revoked,” because “it appears that the recall petitions contain several instances of false information and material.” (Exhibit 7.)

4.

The recall petition’s statement of reasons focuses on a City Council vote to amend the Kingston Terrace Master Plan. The City Recorder’s October 5 letter does not identify the statements that he determined were “false and misleading,” but the City Attorney later argued that the city counselors “are severely constrained and restricted by Oregon state land use laws, the Metro Functional Plan, and prior agreements and approvals of both the existing and previous city councils....” The statement of reasons does not address these factors directly, but it says that “City council can change this plan [i.e., Master Plan].”

5.

On October 11, the Secretary of State’s Elections Director sent a letter to the City Recorder instructing him to “promptly rescind the actions described in [his] October 5 letter ... and to promptly notify the chief petitioner of the rescission.” (Exhibit 8.)

6.

On October 18 and October 19, the City Attorney responded with legal argument that the City Recorder’s letter rescinding approval of the recall petitions was justified and made no indication the City Recorder would follow the Secretary of State’s instruction.

PARTIES

7.

The Secretary brings this action as Oregon’s chief elections officer. ORS 246.110.

8.

The City Recorder of King City is the City’s elections official and the filing officer for recall petitions for city elections. ORS 249.035(3).

1 13.

2 “On the ballot at the election shall be printed in not more than 200 words the reasons for
3 demanding the recall of the officer as set forth in the recall petition” Or. Const., art. II,
4 § 18(5). The chief petitioner submits that statement to the filing officer at the outset of the
5 petition process. *See* ORS 249.865(1) (“Before the petition is circulated for signatures, the chief
6 petitioner of the petition shall file with the officer authorized to order the recall election a copy
7 of the prospective petition signed by the chief petitioner.”); Oregon Secretary of State Elections
8 Division, Recall Manual at 7, available at
9 <https://sos.oregon.gov/elections/Documents/RecallManual.pdf> (designated as a rule by OAR
10 165-014-0005(2)) (providing that the statement of reasons is included in the initial petition
11 form); Prospective Petition—SEL 350, available at
12 <https://sos.oregon.gov/elections/Documents/SEL350.pdf> (same).

13 14.

14 The filing officer is required to confirm the petition includes the required information, to
15 date stamp it, assign it an identification number, and provide it to the Secretary of State’s
16 Elections Division, as well as approve petition form templates for circulation. Recall Manual at
17 8; *see generally* ORS 249.865. Filing officers have no responsibility to review the statement of
18 reasons and no authority to reject a signature if they judge it to be inaccurate.

19 **STATE AND CITY ELECTIONS OFFICIALS**

20 15.

21 “The Secretary of State is the chief elections officer of this state, and it is the secretary’s
22 responsibility to obtain and maintain uniformity in the application, operation and interpretation
23 of the election laws.” ORS 246.110. To obtain and maintain the uniformity in the operation of
24 the election laws, the Secretary issues rules, instructions, and directives, which local officials are
25 required to follow. *See City of Eugene v. Roberts*, 91 Or. App. 1, 3, *aff’d*, 305 Or. 641 (1988)
26 (holding that the Secretary of State, as the State’s “chief election officer” under ORS 246.110,

1 may direct a local election official not to place a measure on the ballot in violation of state law);
2 *see also* ORS 246.120, 246.210.

3 16.

4 The City Recorder is the filing officer for recalls of King City officials. *See* King City
5 Municipal Code 2.30.050; ORS 249.035(3).

6 17.

7 If a city elections officer has failed to comply with any directive or instruction or an
8 interpretation of any election law, the Secretary of State may apply to the appropriate circuit
9 court for an order to compel the city elections officer official to comply. *See* ORS 246.820(1).

10 **CLAIM FOR RELIEF — ORS 246.820**

11 18.

12 The Secretary realleges paragraphs 1-17, above.

13 19.

14 The Secretary informed the City Recorder of her interpretation of the election law
15 regarding recalls and issued an instruction requiring him to rescind a letter disallowing
16 circulation of recall petitions based on the City Recorder's erroneous interpretation of the
17 election laws.

18 20.

19 The City Recorder has failed to comply with the Secretary's interpretation and
20 instruction.

21 21.

22 The Secretary's interpretation of the election laws reflected in the instruction is correct.
23 The City Recorder has no authority to reject the filing or prohibit the circulation of a recall
24 petition based on his determination that it is factually inaccurate.

25

26

1 **REQUESTED RELIEF**

2 22.

3 The Secretary of State requests that the Court order the City Recorder to:

- 4 (a) comply with the Secretary of State’s instruction dated October 11, 2023;
- 5 (b) rescind his letter dated October 5, 2023, to the chief petitioner and inform
- 6 the chief petitioner of the rescission; and
- 7 (c) if the chief petitioner submits signatures on any of the six petitions within
- 8 90 days of filing the prospective petition, proceed to verify those
- 9 signatures in compliance with state law.

10 23.

11 The Secretary of State also requests an award of costs and disbursements under ORS

12 33.720(5) and ORCP 68, and such other relief as the Court may determine is just and proper.

13

14 DATED October 23, 2023.

15 Respectfully submitted,

16 ELLEN F. ROSENBLUM
17 Attorney General

18

19 s/ Brian Simmonds Marshall
BRIAN SIMMONDS MARSHALL #196129
Senior Assistant Attorney General
Trial Attorney
Tel (971) 673-1880
Fax (971) 673-5000
Brian.S.Marshall@doj.state.or.us
Of Attorneys for Plaintiff-Applicant
Oregon Secretary of State

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Prospective Petition

Recall

SEL 350

rev 01/22
ORS 249.865

Warning Supplying false information on this form may result in conviction of a felony with a fine of up to \$125,000 and/or prison for up to 5 years. Changes to the information provided for the chief petitioner or to the circulator pay status below must be reported to the elections official no later than the 10th day after you first have knowledge or should have had knowledge of the change.

This filing is an: Original Amendment

Filing Officer

State County for both county and district offices City

Some Circulators may be Paid

Yes No

Petition for Recall of Provide the name of the public officer and the position that they currently hold.

Name of Public Officer Jamie Fender	Title of Public Officer Mayor
---	---

Statement Provide the reasons for demanding recall in 200 words or less. Any factual information provided must be true.

Recall Mayor Jamie Fender because she voted against her King City constituency for the Extension of Fischer Road in the Kingston Terrace Master Plan.

The planned Fischer Road extension:

Increases traffic through existing neighborhoods:
Provides a direct connection between Roy Rogers Road and 99W that will attract a high volume of regional cut through traffic.
Increased traffic makes neighborhood less safe and less desirable.

Harms the environment and wildlife habitat:

The Fischer Road route is very close to the Tualatin River, disrupting the natural environment with noise and harmful pollutants.
It will cross the Bankston Nature Preserve (protected by a conservation easement) which will forever harm this vital connective natural space

Change Fischer Road from being only a local street:

The King City Comprehensive Plan prevented a future Fischer Road extension from being anything more than a local street. Mayor Fender voted to remove this protection

Mayor Fender voted for this plan despite overwhelming public opposition to the Fischer Road extension.

City council can change this plan. We deserve council members who represent their constituents. Please sign the petition now to take action.

Chief Petitioner Information The chief petitioner must remain throughout the petition process or the petition is void.

→ By signing this document, I hereby state that any factual information (not a matter of opinion) in the above statement is true.

Name Randall Olsen	Contact Phone 503 730-2164
Residence Address street, city, state, zip 13509 SW King Lear Way, King City, OR 97224	
Mailing Address if different Same	Email Address Carnationman@hotmail.com
Signature Randall H. Olsen	Date Signed 9-13-2023

Secretary of State v. King City City Recorder
Exhibit 1 to State's Complaint
Page 1 of 1

City of King City
15300 SW 116th Avenue
King City, OR 97224

DELIVERED SEP 13

PL - 2023 - 2

Prospective Petition Recall

SEL 350

rev 01/22
ORS 249.865

Warning Supplying false information on this form may result in conviction of a felony with a fine of up to \$125,000 and/or prison for up to 5 years. Changes to the information provided for the chief petitioner or to the circulator pay status below must be reported to the elections official no later than the 10th day after you first have knowledge or should have had knowledge of the change.

This filing is an: Original Amendment

Filing Officer

State County for both county and district offices City

Some Circulators may be Paid

Yes No

Petition for Recall of

 Provide the name of the public officer and the position that they currently hold.

Name of Public Officer

Kate Mohr

Title of Public Officer

Councilor

Statement

 Provide the reasons for demanding recall in 200 words or less. Any factual information provided must be true.

Recall Councilor Kate Mohr because she voted against her King City constituency for the Extension of Fischer Road in the Kingston Terrace Master Plan.

The planned Fischer Road extension:

Increases traffic through existing neighborhoods:

Provides a direct connection between Roy Rogers Road and 99W that will attract a high volume of regional cut through traffic.
Increased traffic makes neighborhood less safe and less desirable.

Harms the environment and wildlife habitat:

The Fischer Road route is very close to the Tualatin River, disrupting the natural environment with noise and harmful pollutants.

It will cross the Bankston Nature Preserve (protected by a conservation easement) which will forever harm this vital connective natural space

Change Fischer Road from being only a local street:

The King City Comprehensive Plan prevented a future Fischer Road extension from being anything more than a local street. Councilor Mohr voted to remove this protection

Councilor Mohr voted for this plan despite overwhelming public opposition to the Fischer Road extension.

City council can change this plan. We deserve council members who represent their constituents. Please sign the petition now to take action.

Chief Petitioner Information

 The chief petitioner must remain throughout the petition process or the petition is void.

→ By signing this document, I hereby state that any factual information (not a matter of opinion) in the above statement is true.

Name Randall Olsen	Contact Phone 503 730-2164
Residence Address street, city, state, zip 13509 SW King Lear Way, King City, OR 97224	
Mailing Address if different same	Email Address carnationman@hotmail.com
Signature Randall H Olsen	Date Signed 9-13-2023

Secretary of State v. King City City Recorder
Exhibit 2 to State's Complaint

Page 1 of 1

City of King
15300 SW 116th
King City, OR

DELIVERED SEP 13 2023

PL - 2023 - 6

Prospective Petition Recall

SEL 350

rev 01/22
ORS 249.865

Warning Supplying false information on this form may result in conviction of a felony with a fine of up to \$125,000 and/or prison for up to 5 years. Changes to the information provided for the chief petitioner or to the circulator pay status below must be reported to the elections official no later than the 10th day after you first have knowledge or should have had knowledge of the change.

This filing is an: Original Amendment

Filing Officer

State County for both county and district offices City

Some Circulators may be Paid

Yes No

Petition for Recall of Provide the name of the public officer and the position that they currently hold.

Name of Public Officer	Title of Public Officer
Smart Ocholi	Councilor

Statement Provide the reasons for demanding recall in 200 words or less. Any factual information provided must be true.

Recall Councilor Smart Ocholi because he voted against his King City constituency for the Extension of Fischer Road in the Kingston Terrace Master Plan.

The planned Fischer Road extension:

Increases traffic through existing neighborhoods:
Provides a direct connection between Roy Rogers Road and 99W that will attract a high volume of regional cut through traffic.
Increased traffic makes neighborhood less safe and less desirable.

Harms the environment and wildlife habitat:
The Fischer Road route is very close to the Tualatin River, disrupting the natural environment with noise and harmful pollutants.
It will cross the Bankston Nature Preserve (protected by a conservation easement) which will forever harm this vital connective natural space

Change Fischer Road from being only a local street:
The King City Comprehensive Plan prevented a future Fischer Road extension from being anything more than a local street. Councilor Ocholi voted to remove this protection

Councilor Ocholi voted for this plan despite overwhelming public opposition to the Fischer Road extension.

City council can change this plan. We deserve council members who represent their constituents. Please sign the petition now to take action.

Chief Petitioner Information The chief petitioner must remain throughout the petition process or the petition is void.

→ By signing this document, I hereby state that any factual information (not a matter of opinion) in the above statement is true.

Name Randall Olsen	Contact Phone 503 730-2164
Residence Address street, city, state, zip 13509 SW King Lear Way, King City, OR 97224	
Mailing Address if different same	Email Address carnationman@hotmail.com
Signature Randall H Olsen	Date Signed 9-13-2023

Secretary of State v. King City City Recorder
Exhibit 3 to State's Complaint

Page 1 of 1

City of King City
15300 SW 116th Avenue
King City, OR 97224

DELIVERED SEP 13 2023

DT - 2023 - 7

Prospective Petition Recall

SEL 350

rev 01/22
ORS 249.865

Warning Supplying false information on this form may result in conviction of a felony with a fine of up to \$125,000 and/or prison for up to 5 years. Changes to the information provided for the chief petitioner or to the circulator pay status below must be reported to the elections official no later than the 10th day after you first have knowledge or should have had knowledge of the change.

This filing is an: Original Amendment

Filing Officer

State County for both county and district offices City

Some Circulators may be Paid

Yes No

Petition for Recall of

 Provide the name of the public officer and the position that they currently hold.

Name of Public Officer Micah Paulsen	Title of Public Officer Councilor
---	--------------------------------------

Statement

 Provide the reasons for demanding recall in 200 words or less. Any factual information provided must be true.

Recall Councilor Micah Paulsen because he voted against his King City constituency for the Extension of Fischer Road in the Kingston Terrace Master Plan.

The planned Fischer Road extension:

Increases traffic through existing neighborhoods:

Provides a direct connection between Roy Rogers Road and 99W that will attract a high volume of regional cut through traffic.
Increased traffic makes neighborhood less safe and less desirable.

Harms the environment and wildlife habitat:

The Fischer Road route is very close to the Tualatin River, disrupting the natural environment with noise and harmful pollutants.

It will cross the Bankston Nature Preserve (protected by a conservation easement) which will forever harm this vital connective natural space

Change Fischer Road from being only a local street:

The King City Comprehensive Plan prevented a future Fischer Road extension from being anything more than a local street. Councilor Paulsen voted to remove this protection

Councilor Paulsen voted for this plan despite overwhelming public opposition to the Fischer Road extension.

City council can change this plan. We deserve council members who represent their constituents. Please sign the petition now to take action.

Chief Petitioner Information

 The chief petitioner must remain throughout the petition process or the petition is void.

→ By signing this document, I hereby state that any factual information (not a matter of opinion) in the above statement is true.

Name Randall Olsen	Contact Phone 503 730-2164
Residence Address street, city, state, zip 13509 SW King Lear Way, King City OR 97224	
Mailing Address if different same	Email Address carnationman@hotmail.com
Signature Randall H Olsen	Date Signed 9-13-2023

Secretary of State v. King City City Recorder
Exhibit 4 to State's Complaint
Page 1 of 1

City of King City
15300 SW 116th Avenue
King City, OR 97224

PI-2023-1

DELIVERED SEP 13 2023

Prospective Petition Recall

SEL 350

rev 01/22
ORS 249.865

Warning Supplying false information on this form may result in conviction of a felony with a fine of up to \$125,000 and/or prison for up to 5 years. Changes to the information provided for the chief petitioner or to the circulator pay status below must be reported to the elections official no later than the 10th day after you first have knowledge or should have had knowledge of the change.

This filing is an: Original Amendment

Filing Officer

State County for both county and district offices City

Some Circulators may be Paid

Yes No

Petition for Recall of

 Provide the name of the public officer and the position that they currently hold.

Name of Public Officer Laurie Petrie	Title of Public Officer Councilor
---	--------------------------------------

Statement

 Provide the reasons for demanding recall in 200 words or less. Any factual information provided must be true.

Recall Councilor Laurie Petrie because she voted against her King City constituency for the Extension of Fischer Road in the Kingston Terrace Master Plan.

The planned Fischer Road extension:

Increases traffic through existing neighborhoods:

Provides a direct connection between Roy Rogers Road and 99W that will attract a high volume of regional cut through traffic.
Increased traffic makes neighborhood less safe and less desirable.

Harms the environment and wildlife habitat:

The Fischer Road route is very close to the Tualatin River, disrupting the natural environment with noise and harmful pollutants.

It will cross the Bankston Nature Preserve (protected by a conservation easement) which will forever harm this vital connective natural space

Change Fischer Road from being only a local street:

The King City Comprehensive Plan prevented a future Fischer Road extension from being anything more than a local street. Councilor Petrie voted to remove this protection

Councilor Petrie voted for this plan despite overwhelming public opposition to the Fischer Road extension.

City council can change this plan. We deserve council members who represent their constituents. Please sign the petition now to take action.

Chief Petitioner Information

 The chief petitioner must remain throughout the petition process or the petition is void.

→ By signing this document, I hereby state that any factual information (not a matter of opinion) in the above statement is true.

Name Randall Olsen	Contact Phone 503 730-2164
Residence Address street, city, state, zip 13509 SW King Lear Way, King City, OR 97224	
Mailing Address if different same	Email Address carnationman@hotmail.com
Signature Randall H Olsen	Date Signed 9-13-2023

Secretary of State v. King City City Recorder
Exhibit 5 to State's Complaint
Page 1 of 1

City of King City
15300 SW 116th Avenue
King City, OR 97224

DELIVERED SEP 13 2023

DT - 2023 H

Prospective Petition Recall

SEL 350

rev 01/22
ORS 249.865

Warning Supplying false information on this form may result in conviction of a felony with a fine of up to \$125,000 and/or prison for up to 5 years. Changes to the information provided for the chief petitioner or to the circulator pay status below must be reported to the elections official no later than the 10th day after you first have knowledge or should have had knowledge of the change.

This filing is an: Original Amendment

Filing Officer

State County for both county and district offices City

Some Circulators may be Paid

Yes No

Petition for Recall of

 Provide the name of the public officer and the position that they currently hold.

Name of Public Officer

Title of Public Officer

Marc Manelis

Councilor

Statement

 Provide the reasons for demanding recall in 200 words or less. Any factual information provided must be true.

Recall Councilor Marc Manelis because he voted against his King City constituency for the Extension of Fischer Road in the Kingston Terrace Master Plan.

The planned Fischer Road extension:

Increases traffic through existing neighborhoods:

Provides a direct connection between Roy Rogers Road and 99W that will attract a high volume of regional cut through traffic.
Increased traffic makes neighborhood less safe and less desirable.

Harms the environment and wildlife habitat:

The Fischer Road route is very close to the Tualatin River, disrupting the natural environment with noise and harmful pollutants.

It will cross the Bankston Nature Preserve (protected by a conservation easement) which will forever harm this vital connective natural space

Change Fischer Road from being only a local street:

The King City Comprehensive Plan prevented a future Fischer Road extension from being anything more than a local street. Councilor Manelis voted to remove this protection

Councilor Manelis voted for this plan despite overwhelming public opposition to the Fischer Road extension.

City council can change this plan. We deserve council members who represent their constituents. Please sign the petition now to take action.

Chief Petitioner Information

 The chief petitioner must remain throughout the petition process or the petition is void.

→ By signing this document, I hereby state that any factual information (not a matter of opinion) in the above statement is true.

Name Randall Olsen	Contact Phone 503 730-2164
Residence Address street, city, state, zip 13509 SW King Lear Way King City, OR 97224	
Mailing Address if different	Email Address carnationman@hotmail.com
Signature <i>Randall Olsen</i>	Date Signed 9-19-23

Secretary of State v. King City City Recorder
Exhibit 6 to State's Complaint
Page 1 of 1

City of King City
15300 SW 116th Avenue
King City, OR 97224

PI-2023-05

October 5, 2023

Olsen, Randall
13509 SW King Lear Way
King City, OR 97224

Sent via: First Class Certified U.S Mail;
First Class Mail;
Email carnationman@hotmail.com

RE: Revoking of the Recall Petitions

Dear Mr. Olsen,

I apologize for any inconvenience this may cause, but after a thorough legal review of ORS 249.865 to 249.877, ORS 250.048, and 250.052, and ORS 260.532, and considering the facts pertaining to the six (6) Recall Petitions you filed on September 13, 2023, it appears that the recall petitions contain several instances of false information and material. Due to the false and misleading materials discovered through legal review I am obligated to revoke the approved petitions and signature sheets.

Approvals of the below petitions are hereby revoked, and the signatures collected to date are invalidated due to the presence of material and false information on the petitions:

- PI-2023-01 - Micah Paulsen
- PI-2023-02 - Jaimie Fender - Amended
- PI-2023-03 - Smart Ocholi
- PI-2023-04 - Laurie Petrie
- PI-2023-05 - Marc Manelis - Amended
- PI-2023-06 - Kate Mohr

Please note that I cannot provide you legal or elections advice, recommendations, or considerations.

Thank you for your understanding and prompt attention to this matter.

cc: Mike Weston, Edward Trompke

Ronnie L. Smith

Elections Official | City of King City | Records Department
| GIS Department

M: (503) 840-4524

P: (503)482-8702

E: rsmith@ci.king-city.or.us

A: 15300 SW 116th Ave, King City, Or

www.ci.king-city.or.us



OFFICE OF THE SECRETARY OF STATE

ELECTIONS DIVISION INSTRUCTIONAL LETTER

October 11, 2023

Via email [rsmith@ci.king-city.or.us]

Ronnie L. Smith
Elections Official
City of King City
Records Department
15300 SW 116th Ave.
King City, OR 97224

Dear Mr. Smith:

The Secretary of State, as Oregon's chief elections officer, is responsible for issuing instructions necessary to maintain uniformity in the application, operation, and interpretation of Oregon election laws. ORS 246.110, 246.120. Subject to the instructions of the Secretary of State, county clerks exercise general supervision of the administration of election laws by local elections officials within their jurisdiction. ORS 246.210. The information provided here is an official instruction of the Secretary of State and is provided after consultation with the Washington County Clerk. At the clerk's request, and in the interest of time, we are providing this instruction to you and the clerk simultaneously.

Background

On October 10, 2023, the Elections Division became aware that you had revoked the approval to circulate six recall petitions and declared that the signatures already collected were invalid. In a letter to the chief petitioner dated October 5, 2023, you stated that you took those actions because the recall petitions contained "false information and material."

The six petitions affected are:

PI-2023-01 - Micah Paulsen

PI-2023-02 - Jaimie Fender - Amended

PI-2023-03 - Smart Ocholi

PI-2023-04 - Laurie Petrie

PI-2023-05 - Marc Manelis - Amended

PI-2023-06 - Kate Mohr

Reason for Instruction

Oregon law does not empower filing officers to revoke the approval to circulate recall petitions or invalidate signatures for the reason stated in your October 5, 2023, letter. ORS 249.865-249.877 governs the recall process, and ORS 250.045, 250.048, and 250.052 govern the requirements for recall



OFFICE OF THE SECRETARY OF STATE

petitions. Neither those statutes, nor any rules of the Secretary of State, permit a filing officer to revoke circulation approval or invalidate signatures due to the content of the petition. The filing officer's role is limited to the form of the petition and the verification of the signatures submitted.

Instruction

For the reasons stated above, this letter instructs you, as the filing officer for the six recall petitions, to promptly rescind the actions described in your October 5 letter to the chief petitioner and to promptly notify the chief petitioner of the rescission.

You are encouraged to contact the Elections Division or the Washington County Clerk for any assistance or advice that you deem helpful in responding to this instruction.

Sincerely,

Molly Woon, Elections Division Director

Cc: Dan Forester, Washington County Clerk [Dan_Forester@washingtoncountyor.gov]
P.K. Runkles-Pearson [pk.runkles@sos.oregon.gov]
Ed Trompke [Ed.Trompke@jordanramis.com]