# BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS STATE OF OREGON for the CITY OF PORTLAND

IN THE MATTER OF THE PUBLIC	) FINAL ORDER
FINANCING OF	)
SHO DOZONO	) OAH Case No.: 800420
	)
APPELLANTS: Beryl McNair, Craig	)
Gier, Bruce Broussard and Sam Adams	)

### **HISTORY OF THE CASE**

On March 5, 2008, the City of Portland ("City") issued a Final Certification Determination Letter ("Certification Letter") to Sho Dozono certifying his mayoral campaign as eligible to receive public campaign finance funds. On March 10, 2008, mayoral candidates Beryl McNair and Craig Gier appealed the Certification Letter. On March 11, 2008, mayoral candidate Bruce Broussard appealed the Certification Letter, as did mayoral candidate Sam Adams on March 12, 2008. On March 14, 2008, Broussard withdrew his appeal of the Certification Letter. Based on that withdrawal, Broussard's appeal is hereby dismissed.

On March 10, 2008, the City appointed Presiding Administrative Law Judge David K. Gerstenfeld of the State of Oregon, Office of Administrative Hearings, to preside over the case as hearings officer and referred the case to him. Prehearing conferences were held by telephone on March 10 and March 11, 2008.

A hearing was held on March 17, 2008, in Tualatin, Oregon. The City participated and was represented by attorney Christy Monson; McNair and Gier participated and represented themselves; Adams was not present but participated through his attorney, Roy Pulvers; and Dozono was not present but participated through his attorney, Bruce Campbell. City Auditor Gary Blackmer and City Elections Officer Andrew Carlstrom testified for the City. The record closed at the end of the hearing on March 17, 2008.

#### **ISSUE**

Whether Dozono received in-kind contributions in excess of the applicable limit for candidates seeking certification to receive public campaign finance funds. City Code Sections 2.10.050 C. and 2.10.080 B.

#### **EVIDENTIARY RULING**

Exhibits City 1 through City 23; Dozono 1; McNair 1; Gier 1 and Gier 2; and Adams 1 through Adams 6 were admitted into evidence. Exhibit City 23 was admitted over Adams' objection. Exhibits Adams 2 through Adams 6 were admitted over Dozono's objections that they were not submitted by the deadline established in the Prehearing Order.

#### FINDINGS OF FACT

- 1. In October 2007, Dozono began considering running in the 2008 City of Portland mayoral race. He was uncertain of his chances of prevailing over Adams. On November 9, 2007, Dozono had his company, Azumano Travel Services, Inc., register two website domains (shoformayor.com and dozonoformayor.com) so that if Dozono decided to run for mayor, they would be available for his use. (Ex. City 16 at 4.)
- 2. The websites Dozono reserved were not functional until December 14, 2007, when they were made accessible to the public. They contained biographical information about Dozono as well as information about some of his accomplishments. The website urged people to "show [their] support" for Dozono. Dozono intended this as a method to measure support for his contemplated mayoral run. Dozono had not yet determined if he was going to run for mayor. (Testimony of Blackmer; Ex. City 16 at 13-14.)
- 3. On December 15, 2007, Dozono sent an email to three former classmates, referring them to his websites. The email indicated the websites were the beginning of his grassroots campaign, that Dozono was urging people who wanted to see him run for mayor to indicate their support and that if there was enough support, there would be another candidate for mayor. (Ex. City 16 at 12.)
- 4. In December 2007, some of Dozono's friends and colleagues, led by Len Bergstein, arranged for Goodwin Simon Victoria Research to conduct a poll regarding a possible mayoral candidacy by Dozono. (Exs. City 16 at 4-5; Dozono 1.) The poll was conducted from December 17 through 20, 2007. It included questions related to the level of support in the community for Dozono and Adams as well as questions and polling methods that could be useful to Dozono in developing his campaign strategy and messaging. Some results of the poll were shared with Dozono on December 21, 2007. On December 24, 2007, the polling company provided more detailed results, including some analysis of the poll data, to Dozono and Bergstein. (Exs. City 16 at 5; Dozono 1 at 1; Adams 1.)
- 5. In late 2007, Bergstein attempted to register a Friends of Sho Dozono committee with the Oregon Secretary of State. On December 21, 2007, the Secretary of State rejected, and then accepted this filing. (Ex. City 16 at 5 6.)
- 6. On January 2, 2008, Dozono met with Blackmer to get information and material related to running for mayor as a recipient of Campaign Finance Funds. (Ex. City 16 at 7.)
- 7. On January 6, 2008, Dozono informed a reporter for *The Oregonian* newspaper that he was going to declare his intent to run for mayor the following day. On January 7, 2008, Dozono filed with the City a Declaration of Intent to Participate in the Campaign Finance Fund in which he stated that he intended to seek public campaign funds to run for mayor in the May 2008 primary election. (Exs. City 2; City 16 at 7.)
- 8. On January 8, 2008, the Secretary of State again rejected the Friends of Sho Dozono committee filing. That same day, Vicki Tagliafico, who was Treasurer of that committee, closed the Friends of Sho Dozono committee and registered a different committee (Sho for Mayor), for

which she was also Treasurer, to receive campaign funds and to report campaign expenditures for Dozono. (Test. of Blackmer; Ex. City 16 at 7.)

- 9. On January 17, 2008, Goodwin Simon Victoria Research sent a bill to Bergstein for the poll in the amount of \$27,295. (Ex. City 16 at 8 and 15.)
- 10. On January 31, 2007, Dozono filed for candidacy for the 2008 mayoral election with the City and also filed a request with the City to be certified as eligible to receive money from the Campaign Finance Fund. (Exs. City 4; City 5.)
- 11. As of early February 2008, nobody had yet paid for the poll. Dozono's campaign spoke with Blackmer about whether it would be permissible, under the Campaign Finance Fund laws, for Dozono to pay for the poll himself. Blackmer told Dozono that would be permissible. Dozono then made public representations that he would be paying for the poll himself. On February 15, 2008, Dozono reported to the Secretary of State on its ORESTAR system (a system candidates are required to use to report campaign contribution and expenditure activity to the Secretary of State) that he would be paying for the poll. (Test. of Blackmer; Exs. City 10; City 16 at 8-10.)
- 12. On February 17, 2008, Blackmer told Dozono that he was mistaken in his earlier statement that Dozono could pay for the poll. Blackmer advised that he did not believe it was permissible for Dozono to pay for it. After this, Bergstein agreed to pay for the poll through his company, Northwest Strategies, Inc. (Test. of Blackmer; Exs. City 16 at 10-11; City 17.)
- 13. On March 4, 2008, Dozono amended his ORESTAR filing regarding the poll to report it as an in-kind contribution in the amount of \$27,295, made on December 21, 2007, from Northwest Strategies, Inc. (Test. of Blackmer; Ex. City 18.)
- 14. The Qualifying Period for the 2008 mayoral race began on July 13, 2007. The Exploratory Period for that race began 21 days after the last biennial general election and ended on July 12, 2007. (Ex. City 22 at 2 and 5.)
- 15. For the 2008 mayoral election, the limit for in-kind contributions for candidates seeking funding from the Campaign Finance Fund, or those who have been certified as eligible to receive such funds, for the 2008 mayoral election is \$12,000. (Exs. City 21 at 3; City 22 at 9 and 17.)
- 16. The City Auditor was involved with drafting the Portland City Code provisions creating and regulating the Campaign Finance Fund, including giving testimony to the City Council, which promulgated those provisions. The City Auditor interprets the dollar limitations on in-kind campaign contributions contained in City Code Sections 2.10.050 C. and 2.10.090 E. to apply only to contributions that occurred after the recipient is a "candidate" as defined in City Code Section 2.10.010 D.<sup>1</sup> Applying this interpretation, the Auditor concluded that the \$27,295 in-kind contribution Dozono received (in the form of the results of the December 2007 poll) took

<sup>&</sup>lt;sup>1</sup> Section 2.10.010 D. provides that "'Candidate' means an individual whose name is or is expected to be printed on the official ballot."

place prior to Dozono being a candidate and so did not count toward the limit on in-kind contributions. (Test. of Blackmer; Exs. City 9 at 3-4; City 21 at 3-4.)

17. The City Auditor's Manual states that "The total amount of In-Kind Contributions accepted by [a] participating candidate for Mayor may not exceed \$12,000 during the entire primary election period." (Ex. City 16 at 2.)

#### CONCLUSION OF LAW

Dozono received in-kind contributions in excess of the applicable limit for candidates seeking certification to receive public campaign financing.

#### **OPINION**

This case involves application of relatively new code provisions (City Code Chapter 2.10) regarding the public financing of elections by the City of Portland. Those provisions cover many aspects of elections. They are separate from state statutes and regulations that also govern elections and which are enforced by the Oregon Secretary of State. Given the complexity of these laws and their recent passage, it is not surprising that the participants disagree about the interpretation and application of several aspects of the City Code Sections at issue.

Although nobody disputes that the poll conducted for Dozono in December 2007 constituted an in-kind contribution, nor that it is valued at \$27,295, the participants question whether this in-kind contribution disqualifies Dozono from receiving public campaign financing. The central question to be answered, then, is whether that in-kind contribution counts towards the \$12,000 cap on such contributions set out in City Code Section 2.10.050 C. That provision provides:

In addition to Seed Money, a Candidate seeking certification may accept In-Kind Contributions. The value of any Contribution received under this Subsection shall not count against the applicable limit on Seed Money Contributions described in Section 2.10.050 A.4. The aggregate amount of In-Kind Contributions received under this Subsection shall not exceed an amount equal to six percent of:

- 1. The applicable Primary Election Period spending limit described in Section 2.10.110 A.1. during the Primary Election Period, including the Qualifying and Exploratory Periods;
- 2. The applicable General Election Period spending limit described in Section 2.10.110 A.1. during the General Election Period.

(Emphasis added.)

# City Code Section 2.10.110 A. provides, in part:

[T]he amount of revenues to be distributed to Certified Candidates as described in Section 2.10.100 shall be:

- 1. For contested Primary and special nominating elections:
- a. \$200,000 for each Candidate for nomination to the office of Mayor;

\* \* \* \* \*

- 2. For General Elections:
- a. \$250,000 for each Candidate for election to the office of Mayor;

Read together, these provisions limit in-kind contributions for the mayoral primary to \$12,000 (6 percent of \$200,000). The City asserts that contributions made prior to a person being a "Candidate" do not count towards this \$12,000 limit. The City reaches this interpretation by relying upon the clear reference in the beginning of the rule to "Candidates" being able to receive in-kind contributions subject to the \$12,000 cap.

The Court of Appeals has held that it "must affirm the city's interpretation of its own ordinance unless we determine that the city's 'interpretation is inconsistent with the express language of the ordinance, considered in its context, or with the apparent purpose or policy of the ordinance." *Just v. City of Lebanon*, 193 Or App 121 (2003), *quoting Neighbors for Livability v. City of Beaverton*, 178 Or App. 185, 190 (2001). Similarly, the City's interpretation of the code provisions at issue here is subject to deference as long as it is consistent with the text of the code, considered in context, and the apparent purpose and policy of those code provisions. If the City's interpretation, however, is not consistent with the code's text, context and apparent purpose and policy, then that interpretation cannot stand. *Marshall's Towing v. Dept. of State Police*, 339 Or 54 (2005) (finding that the Oregon State Police's interpretation of its own rule was overly broad and led to an "inherently illogical" result, so could not be upheld).

The City interprets the cap on in-kind contributions contained in City Code Section 2.10.050 C. to apply only to contributions received after the time a person becomes a "Candidate" as defined in City Code Section 2.10.010 D. The first portion of Section 2.10.050 C. explicitly indicates it is addressing the amount of in-kind contributions that "candidates" can receive and the term "candidate" is defined in the City Code. Because the City concluded Dozono was not a "candidate" at the time he received the poll results, and hence the in-kind contribution, it determined that the value of those poll results did not count towards the cap on in-kind contributions contained in Section 2.10.050 C. Appellants assert this is an incorrect interpretation and that in-kind contributions received prior to someone becoming a "candidate" still count towards the cap on in-kind contributions.

The first step in interpreting the applicable code language is to look at the text and context of the code. The text and context of a law include the words of the provision at issue as well as other provisions in the same law and other related laws. *PGE v. Bureau of Labor and Industries*, 317 Or 606, 610-11 (1993). The context of City Code Section 2.10.050 C. includes a similar provision, Section 2.10.090 E., which provides:

In addition to revenues distributed to the Candidate from the Campaign Finance Fund, a Certified Candidate may accept In-Kind Contributions subject to the following limitations:

- 1. During the Primary Election Period, including the Exploratory and Qualifying Periods, the aggregate amount of In-Kind Contributions received by a Certified Candidate shall not exceed an amount equal to six percent of the applicable spending limit described in Section 2.10.110 A.1.;
- 2. During the General Election Period, the aggregate amount of In-Kind Contributions received by a Certified Candidate shall not exceed an amount equal to six percent of the applicable spending limit described in Section 2.10.110 A.2.

(Emphasis added.)

This language, which applies to candidates who have already been certified as eligible to receive Campaign Finance Funds, is very similar, although not identical, to that found in Section 2.10.050 C., which applies to candidates seeking to be certified as eligible to receive Campaign Finance Funds. The provision that applies to already certified candidates expressly limits the amount of in-kind contributions a certified candidate may receive "[d]uring the Primary Election Period, including the Exploratory and Qualifying Periods." This shows an intent to include all contributions received during that period. Although this restriction applies only to Certified Candidates, it is subject to multiple interpretations: that only contributions made after a person became a Certified Candidate (a term defined in Section 2.10.010 E.) are to be considered; or that once a person becomes a Certified Candidate, all contributions that were made during any part of the Primary Election Period, including any time prior to the person becoming a Certified Candidate, are considered.

Although the City argues for the former interpretation, it is not consistent with the actual language of the code provision. Primary Election Period, Exploratory Period and Qualifying Period are all defined in the City Code.<sup>2</sup> The Primary Election Period starts at the same time as does the Exploratory Period and continues beyond the end of the Qualifying Period. The Qualifying Period begins, by definition, the day after the Exploratory Period ends.

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2008 Primary Election Period, the Qualifying Period will begin on July 13, 2007."

<sup>&</sup>lt;sup>2</sup> City Code Section 2.10.010 X. provides that "'Primary Election Period' means the period beginning on the 21<sup>st</sup> day after the preceding biennial General Election and ending the 20<sup>th</sup> day after the Primary Election." Subsection L. defines an Exploratory Period as "the period beginning on the 21<sup>st</sup> day after the biennel General Election and ending the day before the start of the Qualifying Period defined in 2.10.010 Z." Subsection Z, in turn, defines Qualifying Period as "the period beginning on the first day of July of the Primary Election Period and ending on the last day of January of the Primary Election Period. For the

Someone seeking to become a Certified Candidate must file an application with the City Auditor during the Qualifying Period.<sup>3</sup> It is not possible to be a Certified Candidate during the Exploratory Period, which ends before the Qualifying Period begins. Also, unless someone applied for and became a Certified Candidate on the first day of the Qualifying Period, during some portions of the Qualifying Period the person would not be a Certified Candidate and, indeed, might not be a Candidate as defined by City Code. To exclude from the cap set out in Section 2.10.090 E. all in-kind contributions made prior to the person becoming a Certified Candidate would render the explicit reference to aggregating in-kind contributions made during the Exploratory Period meaningless, if not internally inconsistent. When interpreting City Code provisions, as when interpreting statutes, the language of the provisions should be interpreted, when possible, in such a manner as to give effect to all of its provisions.<sup>4</sup> (*See Martin v. City of Tigard*, 183 Or App 408, 415 (2002), holding that other statutory construction directives of ORS 174.010 applies to interpretations of city ordinances as well as to statutes.)

Accordingly, Section 2.10.090 E. must be read to apply the cap on in-kind contributions to all such contributions made during any portion of the Primary Election Period, including times when the person was not yet a Certified Candidate. The similarity in language, and intent, between this limitation and the limit imposed by Section 2.10.050 C. requires a similar interpretation of Section 2.10.050 C. Accordingly, Section 2.10.050 C. encompasses in-kind contributions made prior to the person becoming a Candidate. To interpret this provision otherwise would mean that those contributions are not considered when determining whether someone can be certified to receive Campaign Finance Funds, but once the person is certified, Section 2.10.090 E. would consider those contributions and, if they exceeded \$12,000, result in a violation that could subject the just certified candidate to civil penalties and revocation of his or her certification.<sup>5</sup>

The fact that the cap on in-kind contributions applies to all such contributions made during the Primary Election Period is also consistent with the rest of the language of Section 2.10.050 C. That section defines the dollar limit on such contributions as six per cent of "[t]he applicable Primary Election Period spending limit described in Section 2.10.110 A.1. during the Primary Election Period, including the Qualifying and Exploratory Periods." (Emphasis added.) By including the phrase "during the Primary Election Period, including the Qualifying and Exploratory Periods" the text of the code provision itself indicates that the limit applies to in-

In the construction of a statute, the office of the judge is simply to ascertain and declare what is, in terms or in substance, contained therein, not to insert what has been omitted, or to omit what has been inserted; and where there are several provisions or particulars such construction is, if possible, to be adopted as will give effect to all.

<sup>&</sup>lt;sup>3</sup> City Code Section 2.10.080 A. provides, in part, that "a candidate may file for certification with the Auditor. The request shall be filed during the applicable Qualifying Period \* \* \*." The Exploratory Period is defined by Section 2.10.010 L. as ending the day before the qualifying period starts. Accordingly, people cannot apply for certification until after the Exploratory Period is already over.

<sup>&</sup>lt;sup>4</sup> ORS 174.010 provides:

<sup>&</sup>lt;sup>5</sup> City Code Section 2.10.220 A. and B. permit the City to impose civil penalties against, and revoke the certification of, Certified Candidates who have violated Section 2.10.090.

kind contributions made during any part of the Primary Election Period and not just those portions after the person became a Candidate.

The network of laws and regulations from the City of Portland and the State of Oregon regulating elections are complex, and the City provisions addressing the public funding of campaigns are relatively new. The Auditor has attempted to read these provisions as objectively and narrowly as possible to avoid creating opportunities for subjectivity or changing the understanding of these laws while an election is in progress. Despite these attempts, however, the City's interpretation of Section 2.10.050 C. is contrary to the text and context of the code provisions and for that reason cannot stand.

To read the in-kind contribution limits of 2.10.050 C. to apply only to those contributions made after a person has become a Candidate is inconsistent with other Portland City Code provisions regarding public campaign funds. Accordingly, the City's interpretation cannot be followed. Instead, the only way to read these related City Code provisions together, and give effect to all of them, is to have the limits on in-kind contributions apply to such contributions received *at any point* in the Primary Election Period, even if they were received before the person became a Candidate. Consequently, the \$27,295 in-kind contribution Dozono received from the poll results counts towards, and exceeds, the limit on in-kind contributions. Because of this, Dozono did not meet the requirements of City Code Section 2.10.050 C. and is not eligible to receive Campaign Finance Funds.

#### **ORDER**

Bruce Broussard's appeal of the March 5, 2008 Final Certification Determination Letter regarding Sho Dozono is DISMISSED.

Sho Dozono's certification to receive campaign finance funds is REVOKED and he must, within 60 days of the date this Final order is issued, pay the City of Portland an amount equal to any campaign finance funds received for the 2008 mayoral election, along with simple interest on that amount at the rate of 12 percent per annum from the date this order is issued.

David K. Gerstenfeld

Hearings Officer (Presiding Administrative Law Judge Office of Administrative Hearings)

ISSUANCE AND MAILING DATE: March 20, 2008

#### WRIT OF REVIEW

City Code Section 2.10.230 E. provides, in relevant part:

- 5. The order of the Hearings Officer is a final decision of the City.
- 6. Judicial review of an order made under this Section shall be as provided in Title 22.

City Code Section 22.10.060 provides:

The determination of the Code Hearings Officer is a quasi-judicial decision and is not appealable to Council; appeals from any determination by the Code Hearings Officer shall be by writ of review to the Circuit Court of Multnomah County, Oregon, as provided in ORS 34.010-34.100

Oregon Revised Statutes 34.010 through 34.100 provide:

**34.010 Former writ of certiorari as writ of review.** The writ heretofore known as the writ of certiorari is known in these statutes as the writ of review.

**34.020** Who may obtain review; intermediate orders reviewable. Except for a proceeding resulting in a land use decision or limited land use decision as defined in ORS 197.015, for which review is provided in ORS 197.830 to 197.845, or an expedited land division as described in ORS 197.360, for which review is provided in ORS 197.375 (8), any party to any process or proceeding before or by any inferior court, officer, or tribunal may have the decision or determination thereof reviewed for errors, as provided in ORS 34.010 to 34.100, and not otherwise. Upon a review, the court may review any intermediate order involving the merits and necessarily affecting the decision or determination sought to be reviewed.

**34.030** Jurisdiction to grant writ; petition for writ; time limit. The writ shall be allowed by the circuit court, or, in counties where the county court has judicial functions, by the county court wherein the decision or determination sought to be reviewed was made, upon the petition of the plaintiff, describing the decision or determination with convenient certainty, and setting forth the errors alleged to have been committed therein. The petition shall be signed by the plaintiff or the attorney of the plaintiff, and verified by the certificate of an attorney to the effect that the attorney has examined the process or proceeding, and the decision or determination therein, and that it is erroneous as alleged in the petition. A writ shall not be allowed unless the petition therefor is made within 60 days from the date of the decision or determination sought to be reviewed.

**34.040 When allowed.** (1) The writ shall be allowed in all cases in which a substantial interest of a plaintiff has been injured and an inferior court including an officer or tribunal other than an agency as defined in ORS 183.310 (1) in the exercise of judicial or quasi-judicial functions appears to have:

- (a) Exceeded its jurisdiction;
- (b) Failed to follow the procedure applicable to the matter before it;

- (c) Made a finding or order not supported by substantial evidence in the whole record;
- (d) Improperly construed the applicable law; or
- (e) Rendered a decision that is unconstitutional.
- (2) The fact that the right of appeal exists is no bar to the issuance of the writ.
- **34.050 Plaintiff's undertaking.** Before allowing the writ, the court shall require the plaintiff to give an undertaking to its approval, with one or more sureties, in the sum of \$100, to the effect that the plaintiff will pay all costs and disbursements that may be adjudged to the defendant on the review.
- **34.060 To whom directed; return.** The writ shall be directed to the court, officer, or tribunal whose decision or determination is sought to be reviewed, or to the clerk or other person having the custody of its records or proceedings, requiring return of the writ to the circuit court, with a certified copy of the record or proceedings in question annexed thereto, so that the same may be reviewed by the circuit court. The court allowing the writ shall fix the date on which it is to be returned, and such date shall be specified in the writ.
- **34.070 Stay of proceedings.** In the discretion of the court issuing the writ, the writ may contain a requirement that the defendant desist from further proceedings in the matter to be reviewed, whereupon the proceedings shall be stayed accordingly.
- **34.080 Issuance and service of writ.** Upon the filing of the order allowing the writ, and the petition and undertaking of the plaintiff, the clerk shall issue the writ, as ordered. The writ shall be served by delivering the original, according to the direction thereof, and may be served by any person authorized to serve a summons. A certified copy of the writ shall be served by delivery to the opposite party in the suit or proceeding sought to be reviewed, at least 10 days before the return of the original writ.
- **34.090 Order for further return.** If the return to the writ is incomplete, the court may order a further return to be made.
- **34.100 Power of court on review; appeal.** Upon the review, the court shall have power to affirm, modify, reverse or annul the decision or determination reviewed, and if necessary, to award restitution to the plaintiff, or to direct the inferior court, officer, or tribunal to proceed in the matter reviewed according to its decision. From the judgment of the circuit court on review, an appeal may be taken in like manner and with like effect as from a judgment of a circuit court in an action.

# APPENDIX A LIST OF EXHIBITS CITED

City 2	Dozono's Declaration of Intent
City 4	Dozono's Filing of Candidacy
City 5	Dozono's Request for Certification
City 9	Initial Certification Determination Letter
City 10	Dozono ORESTAR screenshot
City 16	February 28, 2008, Response to Request for Information
City 17	March 4, 2008, Letter from Bergstein to Blackmer
City 18	Dozono ORESTAR screenshot (amended)
City 21	Final Certification Determination Letter
City 22	Portland City Code Chapter 2.10
Dozono 1	Declaration of Amy R. Simon
Adams 1	Declaration of Dr. Robert G. Meadow

## **CERTIFICATE OF MAILING**

On March 20, 2008, I electronically mailed the foregoing Final Order in OAH Case No. 800420.

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