

Seth Alan Woolley
3403 NE Stanton Street
Portland, OR 97212-2744
503-953-3943

April 17, 2012

LaVonne Griffin-Valade
Portland City Auditor
1121 SW 4th Avenue
Room 140
Portland, OR 97204
lavonne@portlandoregon.gov

Dear Ms Griffin-Valade:

Accompanying this letter is a Complaint I am today filing with the Oregon Secretary of State on what I perceive to be violations of elections laws by Charles Hales.

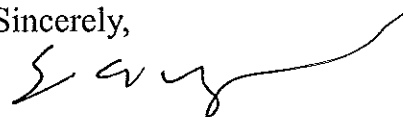
Violation No. 5 in the Complaint describes violations of the Portland City Charter and Portland City Code. Under Portland City Code § 2.08.050 and Portland City Charter § 2-202, it appears that Charles Hales is not legally qualified to be a candidate for Mayor of Portland or to serve in that office.

I request that you investigate these alleged violations of the Portland City Charter and Portland City Code. If you find that Charles Hales was not a validly registered voter when he filed his candidacy for Mayor of Portland:

1. Portland City Code § 2.08.050 C. requires that you reject his filing for candidacy; and
2. Portland City Charter § 2-202 requires that, if he is elected, "the office shall immediately become vacant."

Please let me know whether you will be investigating these violations.

Sincerely,



Seth Woolley

Seth Alan Woolley
3403 NE Stanton Street
Portland, OR 97212-2744
503-953-3943

April 17, 2012

Tim Scott
Director of Elections
Multnomah County Elections Division
1040 SE Morrison Street
Portland, OR 97214
elections@multco.us

Dear Mr. Scott:

Accompanying this letter is a Complaint I am today filing with the Oregon Secretary of State on what I perceive to be violations of elections laws by Charles Hales.

Violation No. 2 in the Complaint alleges that Charles Hales continued to vote unlawfully in Oregon after changing his residence and domicile back to Oregon as of 2010, after having sworn to the State of Oregon that his "true, fixed, permanent home" during all of the years 2004 through 2009 was not in Oregon. As stated in the Complaint:

His current alleged Oregon voter registration is based upon his filing of a voter registration card on March 18, 2008, listing his Oregon residence address as 7136 S.E. 27th Avenue, Portland, Oregon. At that time, however, Charles Hales was not a legal resident of Oregon, because he swore to the State of Oregon that Washington was his true, fixed, permanent home during all of 2008. See Violation No. 1, part B, above. Consequently, his attempt at that time to register to vote in Oregon was invalid and did not result in a valid voter registration.

ORS 247.012(3) provides:

Registration of a qualified person occurs:

(a) When a legible, accurate and complete registration card is received in the office of any county clerk, the Office of the Secretary of State, an office of the Department of Transportation, a designated voter registration agency under ORS 247.208 or at a location designated by a county clerk under subsection (7) of this section.

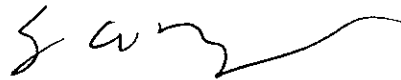
The voter registration card filed by Charles Hales was not accurate, because it claimed that his residence was in Oregon. Thus, his registration as a voter in Oregon did not occur.

Charles Hales since March 18, 2008, has not filed another Oregon voter registration card. He has not filed such a card since resuming his residence in Oregon in 2010. Consequently, he is not validly registered to vote in Oregon, and his votes in Oregon elections in 2010, 2011, and 2012 were unlawful, in addition to his votes in Oregon elections during the years 2004-09.

County elections officers are charged with investigating and canceling invalid voter registrations under ORS 247.174(2) and ORS 247.195. I request that you investigate the validity of his voter registration, declare it to have been invalid, and cancel it.

Please let me know whether you will be investigating this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Seth Woolley', with a long horizontal flourish extending to the right.

Seth Woolley