



P O R T L A N D  
**CITY AUDITOR**  
**Elections**

June 22, 2020

Ted Wheeler  
PO Box 42307  
Portland OR 97242

Friends of Ted Wheeler  
3321 SE 20<sup>th</sup> Avenue  
Portland, OR 97202

Andrea Hull  
7024 SE Reed College Place  
Portland, OR 97202

**RE: City Campaign Regulations -  
No Violation (2020-19-TW)**

**DELIVERED ELECTRONICALLY**

campaign@tedwheeler.com  
amy@tedwheeler.com  
andrealaughs@gmail.com

Dear Friends of Ted Wheeler and Andrea Hull,

On May 20, 2020, the City Elections Office received a complaint alleging violations of City campaign regulations by an individual contributor to your campaign. Specifically, the complaint claims a contribution was received your campaign from an individual in excess of \$500 ([PCC 2.10.010](#)).

City Campaign Regulations

Portland Charter Chapter 3, Article 3 and City Code Chapter 2.10 (collectively, the “City Campaign Finance Regulations” or “Regulations”) were passed by voters in November 2018 and are administered and enforced by the City Auditor’s Office. The City Campaign Finance Regulations require campaign contribution limitations for candidates and campaigns within an elections cycle. Portland City Code (PCC) 2.10.010 (Contributions in City Candidate Elections). With some exceptions, the regulations specifically limit contributions from individuals in excess of \$500 in the same elections cycle.

Although passed by voters in 2018, City Campaign Regulations regarding campaign contribution limits were enforced beginning May 4, 2020 following recent court decisions<sup>1</sup>.

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<sup>1</sup> See decision in Oregon Supreme Court, *Multnomah County et al v. Mehrwein et al* (Case No. 5066445) and Court of Appeals Order to vacate and remand for reconsideration, *In the Matter of Validation Proceeding to Determine*



Candidates qualified to appear on the ballot for the May 19, 2020 Primary Election were given notice of the change in law and new enforcement date on April 29, 2020.<sup>2</sup>

Individual Contribution Limit: No Violation

Complaint 2020-19-TW alleges an individual (Andrea Hull) contributed \$1,000 on May 8, 2020, in violation of Campaign Regulations. PCC 2.10.010 states, in relevant part:

- A. An Individual or Entity may make Contributions only as specifically allowed to be received in this Chapter.
- B. A Candidate or Candidate Committee may receive only the following Contributions during any Elections Cycle:
  - 1. Not more than \$500 from an Individual or Political Committee other than a Small Donor Committee (PCC 2.10.010 B.1.)

On May 8, 2020 the Oregon State campaign finance transaction database (ORESTAR), shows that Andrea Hull made a contribution of \$1,000 to the Friends of Ted Wheeler campaign (Committee ID 5591). On May 9, 2020 the amount was refunded in full (see transaction ID 3477604). Andrea Hull then contributed \$500 on the same day, (see transaction ID 3467856).

Although the amount originally contributed was above the limits in City Campaign Regulations, it was refunded within a business day. As a result, the net contribution provided by the individual to the campaign is within the limits required by City law (\$500) and I find no violation.

Appeals

Appeals for this decision can be made to the Multnomah County Circuit Court within 30 days, as provided by PCC 2.10.050. I.

Sincerely,



Deborah Scroggin  
City Elections Officer

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*the Legality of City of Portland Charter Chapter 3, Article 3 and Portland City Code Chapter 2.10 Regulating Campaign Finance and Disclosure (Case No. A171435).*

<sup>2</sup> See email and notification sent from City Elections Office to candidate Ted Wheeler and campaign on 12/29/2020, "City of Portland campaign contributions to be enforced May 4, 2020".