

## Response to Complaint 2020-26-LS and 2020-27-LS

Jerome Brooks <jeromeabrooks@gmail.com>

Wed 8/5/2020 4:58 PM

To: City Elections <elections@portlandoregon.gov>

Cc: Loretta Smith <Sloretta407@aol.com>; Hansen, Louise <Louise.Hansen@portlandoregon.gov>; Scroggin, Deborah <Deborah.Scroggin@portlandoregon.gov>; Mottet, Susan <Susan.Mottet@portlandoregon.gov>; Jef Green <j.green@c-systems.com>

Hi Deborah,

Thanks for the opportunity to respond to the questions regarding Campaign Regulations Complaint 2020-26-LS and 2020-27-LS. Please find the answers to your question below.

- 1. Please confirm when your campaign printed the attached mailer, the number of individuals the mailer was sent to, and the costs associated with producing the attached mailer.**

Our campaign did print the mailer in question. The mailer was sent to 75,214 households and cost \$40,313.42 to produce and mail. It is our belief that the disclaimer language meets the requirements and is clearly visible. The font and color are comparable to the text listing our endorsements in the same shot, and the text is actually larger than the text listing our endorsements. It is legible and comprehensible to a person of regular reading and vision abilities, as required. The campaign was unaware that NACS codes were needed to accompany the contributors; the organizations are clearly identifiable as unions with the disclosure of their local numbers.

The argument that the \$6,000 listed in the campaign finance system as "Anonymous" should have been disclosed as one of our top contributors is nonsensical. The listed donation is actually a collection of individual donations under the \$250 individual donation limit, none of which the campaign actually benefited from. Similar to returning donations that are over the maximum amount allowed, the aggregate \$6,000 donation was donated to a local nonprofit, the Oregon Food Bank, as state law requires. The "contribution" in question provided no funding that the campaign used, and subsequently did not fund this mailer, or any voter communications. To have listed "Anonymous" as a top campaign contributor in our communications would have been tantamount to fraud, which is what the complainant, Seth Wooley, is saying we should have done.

Again, thank you for the opportunity to respond to the questions regarding Campaign Regulations Complaint 2020-26-LS and 2020-27-LS.

Best,

Jerome Brooks  
Campaign Manager

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Jerome A. Brooks  
(503) 509-8873  
[jeromeabrooks@gmail.com](mailto:jeromeabrooks@gmail.com)