



P O R T L A N D
CITY AUDITOR
Elections

October 5, 2020

Sarah Iannarone
333 SE 2nd Ave
Portland, OR 97214

Friends of Sarah for Portland
4417 SE Windsor Court
Portland, OR 97206

DELIVERED ELECTRONICALLY

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NOTICE OF DETERMINATION

Campaign Regulations Complaint No.: 2020-39-SI
- No Violation -

Dear Sarah Iannarone and Friends of Sarah for Portland:

On September 2, 2020, the City of Portland Auditor's Office received the complaint named above, alleging campaign disclosure violations of Portland City Charter Section 3-303 and corresponding Portland City Code (PCC) chapter 2.10. Specifically, the complaint alleged a lack of prominent campaign funding disclosures on a sponsored social media post provided to voters by Sarah Iannarone's campaign, Friends of Sarah for Portland.

After an investigation, I have identified no violation of City campaign regulations based on the allegations.

1. No Violation of City Campaign Regulations

Social media sponsored post did not lack required campaign funding information

Complaint No. 2020-39-SI alleged Friends of Sarah for Portland failed to include required communication funding disclosure information on a sponsored Facebook campaign post. The post at issue was created and sponsored on August 31, 2020. The post contained the statement, "Paid for by Friends of Sarah for Portland," which linked to the campaign's Facebook page. The post also included an August 30, 2020, video segment of an interview



with mayoral candidate, Sarah Iannarone, which was produced by the KATU television broadcast station.

The campaign confirmed, and Auditor's Office finds, that at the time of the posting and sponsorship of the Facebook post, the campaign's static Facebook profile page disclosed Open and Accountable Elections as its dominant contributor.¹ The campaign admitted dominant contributor Julian Bell was later added to its Facebook profile page on September 4, 2020, in response to findings in the Letter of Warning and Education for Violations issued by the Auditor's Office on September 1, 2020, for Complaints No. 2020-32-SI through 2020-34-SI.²

The Auditor's office finds the required disclosure information related to the current complaint is the same as the disclosure information required in Complaints No. 2020-32-SI through 2020-34-SI. In the Letter of Warning and Education for Violations mentioned above, the Auditor's Office allowed the campaign until September 16, 2020, to remedy deficiencies in its required disclosures. The campaign complied with the Auditor's Office requirement by the deadline. **Because the sponsored Facebook post at issue occurred within the time period the campaign was allowed to remedy its required disclosures, and the campaign timely remedied its disclosures, I find no violation.**

Appeals

Pursuant to PCC 2.10.050 I., an appeal may be filed with the Multnomah County Circuit Court within 30 days of the issuance of a decision.

Sincerely,

A handwritten signature in black ink that reads "Louise Hansen". The signature is written in a cursive style with a large initial "L" and "H".

Louise Hansen
City Elections Officer

¹ The interim Auditor Administrative Rules (ARAs) in effect at the time of the communication at issue allowed campaigns to include all required prominent disclosure information "on a static page, such as a profile page." See [ARA 13.01\(F\)\(2\)](#).

² The Auditor's Office found there were two disclosable dominant contributors (Open and Accountable Elections, and Julian Bell), and further required the campaign to disclose the types of businesses from which Julian Bell had obtained a majority of income over the previous five years. See [2020-323334-SI Final Determination](#).