

Subject: FW: Notice of Complaint No. 2020-31-VS
Date: Monday, September 28, 2020 at 2:56:48 PM Pacific Daylight Time
From: Vanessa Sturgeon
To: City Elections
CC: Scroggin, Deborah" , Deborah >, \ Hansen, Louise"
Attachments: image001.jpg, image002.jpg, image003.jpg, image004.jpg

Dear Mr. Sibley, Ms. Hanson and Ms. Scroggin,

Please see the following response in respect to the Notice of Complaint:

1. My records indicate that the contribution in question was refunded 4 days later by C&E systems.
2. I would not knowingly violate any campaign finance law. Normally, I would rely upon the compliance firm of C&E Systems to make sure that all contributions were appropriate. Until I received your Notice of Complaint, I had no knowledge of the City of Portland ordinance limiting contributions to \$500.
3. It honestly seems to me the City's application of its new campaign finance law is overly aggressive. Following the contribution in June that exceeded the City's new campaign contribution finance limits, that error was quickly caught and remedied by C&E Systems. The City's approach doesn't allow me (who unknowing broke this rule) the opportunity to have the potential violation remedied, as the City did not give me any notice of violation until your Notice of Complaint several months later. It's my understanding that the campaign promptly self-reported the potential excess contribution and returned the funds within two weeks of receiving them. From what is said in the Notice Of Complaint, the campaign complied with the intent of the law (which is to limit campaign contributions) and none of the excess funds were used or spent for campaign purposes. Citing a violation and assessing a penalty against a contributor who made a simple error (having received no clear guidance from the City as to how the law works) seems excessively harsh.

Thank you for your consideration.

Warm regards,

VANESSA STURGEON | President & CEO

760 SW 9th Avenue, Suite 2250, Portland, OR 97205

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Begin forwarded message:

From: City Elections <elections@portlandoregon.gov>
Date: September 14, 2020 at 10:10:57 AM PDT
To: Vanessa Sturgeon <vanessa@tmtdevelopment.com>
Cc: "Scroggin, Deborah" <Deborah.Scroggin@portlandoregon.gov>, "Hansen, Louise" <Louise.Hansen@portlandoregon.gov>
Subject: Notice of Complaint No. 2020-31-VS

Hello Vanessa Sturgeon,

Please see the attached notification and related timeline for response regarding an alleged violation of the City of Portland's campaign contribution regulations.

If you have any questions, please be in touch directly. Please note that the City Elections Officer, Louise Hansen, will be out of the office until Wednesday, September 23. Therefore, for the quickest response, email the Elections Office at elections@portlandoregon.gov.

Also, if you have a different preferred email for our office to use for correspondence, please let us know.

Sincerely,
Cody Sibley
He/Him/His
Elections Coordinator
Office of the City Auditor | City of Portland