



P O R T L A N D
CITY AUDITOR
Elections

October 29, 2020

Ted Wheeler
PO Box 42307
Portland, OR 97242

Friends of Ted Wheeler
3321 SE 20th Avenue
Portland, OR 97202

DELIVERED ELECTRONICALLY

campaign@tedwheeler.com
danny@tedwheeler.com
j.green@c-esystems.com

NOTICE OF DETERMINATION

Campaign Regulation Complaint No.: 2020-43-TW
- No Violations -

Dear Ted Wheeler and Friends of Ted Wheeler,

On October 1, 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 \(PCC\) Section 2.10.030](#). Specifically, the complaint alleged a lack of prominent disclosures of a self-funding contributors on a campaign email by the campaign, Friends of Ted Wheeler, as well as on the campaign's website.

After an investigation, I identified no violations of City campaign regulations.

No Violations of City Campaign Finance Regulations

Email and website did not fail to disclose required campaign funding information

Ted Wheeler is a City mayoral candidate for the November 3, 2020 General Election. On October 1, 2020, an elections-related email was distributed by the Friends of Ted Wheeler campaign to over 500 Portland voters. Complaint No. 2020-43-TW alleged that as of October 1, 2020, both the campaign's website and an email distributed to voters failed to disclose required funding information because Ted Wheeler was not disclosed as a dominant contributor.



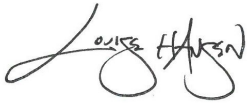
[City Charter Section 3-303\(c\)](#) and corresponding [PCC 2.10.030\(C\)](#) require disclosures be current to within 10 business days of the communications in question. October 1, 2020 is the communication date for both communications at issue in this complaint. As a result, the website and email were required to disclose funding information current as of September 17, 2020. However, the qualifying contribution from Ted Wheeler did not occur until September 18, 2020,¹ so the candidate was not required to be disclosed as a dominant contributor. Therefore, the funding disclosures included on the website and on the October 1, 2020 email were accurate to within 10 business days. Subsequent review of the Friends of Ted Wheeler website by the Auditor's Office also confirmed that the website added candidate Ted Wheeler as a dominant contributor after October 1, 2020.

Based on the foregoing, I find no violations of the campaign finance regulations.

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, stylized "L" and "H".

Louise Hansen
City Elections Officer

¹ According to the Oregon System for Tracking and Reporting (ORESTAR), on September 18, 2020, Edward T. Wheeler (Ted Wheeler) contributed \$150,000 to the Friends of Ted Wheeler campaign. This information was reported in ORESTAR on the transaction filing deadline of September 29, 2020 and amended on October 2, 2020 (Transaction IDs: 3579438 and 3605574).