

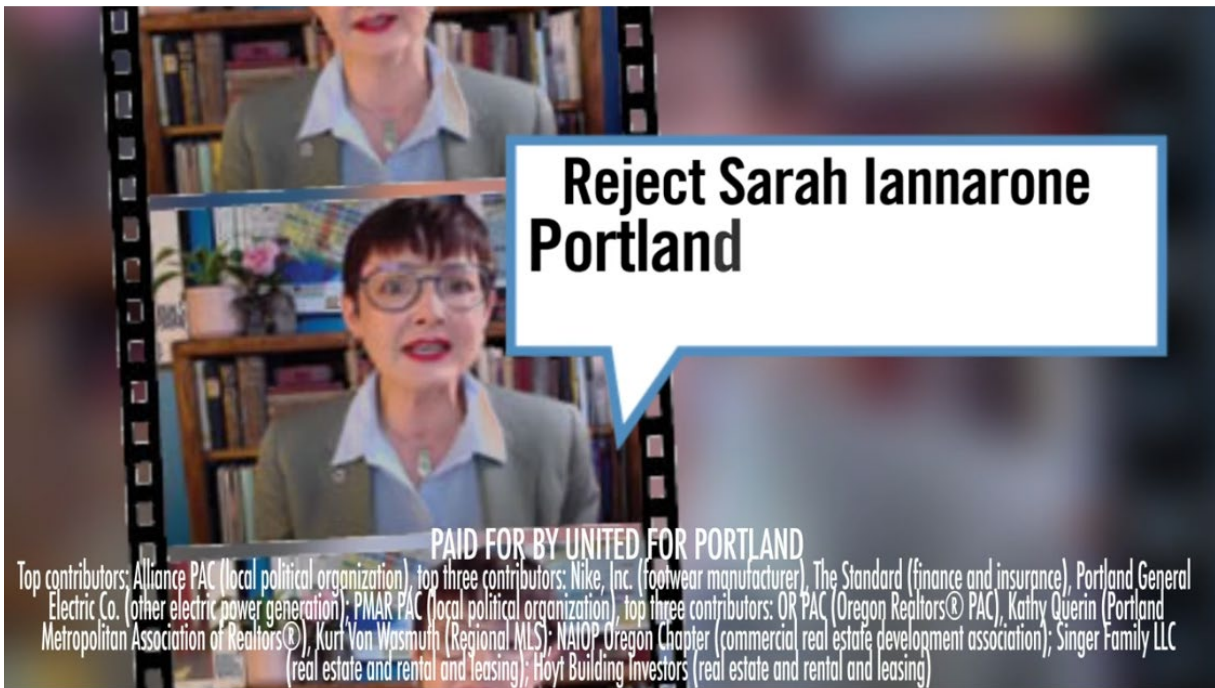
From: [Alan Kessler](#)
To: [City Elections](#)
Subject: United for Portland 10/7/2020 video opposing Iannrone — Prominent Disclosure
Date: Thursday, October 8, 2020 12:36:50 AM
Attachments: [untitled](#)
[EL20_PDX_Tweeter_FINAL-1-EL20_PDX_Tweeter_FINAL-1.mp4](#)

To Whom It May Concern:

This email is intended to serve as my official complaint under Portland Charter Chapter 3, Article 3, and Portland City Code Chapter 2.10 against United for Portland, with respect to a video it posted to its website at <https://www.unitedforportland.com/> opposing mayoral candidate Sarah Iannarone. A copy of the video is attached.

The video fails to Prominently Disclose the fundings sources, at least because the text of the disclaimer is not legible, let alone "readily comprehensible to a person with average reading[and] vision..." PCC 2.10.080(O). It is in a narrow font and appears in low contrast (white text against a light-colored background). The text is in a far smaller font and at far lower contrast than the message the video authors intended their audience to read.

Sincerely yours,
Alan Kessler
2725 SE 36th Ave.
Portland OR 97202
503 860 1020



From: [Alan Kessler](#)
To: [City Elections](#)
Subject: United for Portland - Disclosure violation October 7, 2020 www.unitedforportland.com/record
Date: Wednesday, October 7, 2020 5:30:11 PM
Attachments: [Screenshot_2020-10-07 United for Portland's Futures 2020.png](#)

To Whom It May Concern:

This email is intended to serve as my official complaint under Portland Charter Chapter 3, Article 3, and Portland City Code Chapter 2.10 against Friends of Ted Wheeler, the principal campaign committee of his campaign for Mayor of Portland.

The attached PDF is a copy of the website at <https://www.unitedforportland.com/record> as it appears now on October 7, 2020. It is a Communication subject to PCC 2.10.030, however it fails to Prominently Disclose the required funding information.

Specifically, the purported disclosure at the bottom of the page is in a smaller font and in a narrower typeface than the majority of the text on the page.

I respectfully request that the Auditor investigate this violation of the timely disclosure provisions of 2.10.030 and take all appropriate enforcement actions in accordance with PCC 2.10.050.

Faithfully yours,
Alan Lloyd Kessler
2725 SE 36th Ave.
Portland, OR 97202

(503) 860 1020



WHY TED WHEELER?

Now more than ever, Portland needs a leader ready to tackle our most pressing challenges:



✓ CLIMATE

Wheeler has worked to put climate at the center of the agenda: resolving to transition our city to 100% renewable energy by 2050, limiting our reliance on single-use plastics, and implementing the Portland Clean Energy Fund. He believes we should build back better as we recover from the economic impacts of the coronavirus.

✓ HOMELESSNESS

Wheeler more than doubled Portland's shelter capacity, preventing more than 7,000 households from experiencing homelessness and helping 6,000 people move off the streets and into transitional housing. His plan is compassionate toward those individuals and families who have fallen on hard times — and compassionate toward those who have every right to insist that the sidewalks in front of their businesses and homes are clean and accessible.

✓ REIMAGING PUBLIC SAFETY

The national depiction of our city as angry, violent, and unsafe is a lie. But while people like the President traffic in dishonesty, a few dozen individuals engaged in violence and criminal destruction are feeding this hysteria. That's why Wheeler stood up to Donald Trump and is working to bring people together to create real reform in policing and racial justice in our city — while also holding those who commit violence accountable.

Wheeler has worked to address some of the Portland Police Bureau's biggest issues, like de-escalation and bias training, while increasing funding for behavioral health and public safety support specialists who can respond to non-emergency calls. He supports the City's police oversight measure on November's ballot to bring accountability to the Bureau.

✓ ECONOMIC RECOVERY

Wheeler will put support for small businesses first in our recovery from the economic impacts of the coronavirus. That's why he has worked to establish a program that will enable local companies to create job and internship opportunities for underrepresented youth, and increase purchasing from diverse businesses. He is also exploring 5G technology for the city, to enable advanced internet connections that power the modern economy.

Paid for by United for Portland. Top contributors: Alliance PAC (local political organization), top three contributors: Nike, Inc. (family clothing stores), The Standard (direct life insurance carriers), Portland General Electric Co. (other electric power generation); PMAR PAC (local political organization), top three contributors: OR PAC (Oregon Realtors® PAC), Kathy Querin (Portland Metropolitan Association of Realtors®), Kurt Von Wasmuth (Regional MLS).

From: [Ted Timmons](#)
To: [City Elections](#)
Subject: United For Portland elections violation complaint
Date: Thursday, October 8, 2020 12:28:20 PM
Attachments: [keyframe010.png](#)
[keyframe012.png](#)
[keyframe007.png](#)
[keyframe003.png](#)
[frame708.png](#)
[frame612.png](#)
[frame463.png](#)
[frame259.png](#)
[frame147.png](#)
[frame015.png](#)

First, as a preamble, I'm very concerned that new groups have popped up, intentionally under the 30 day window, which means the city's campaign laws are effectively toothless. I hope this is handled and penalties are still considered even if it happens after the election has taken place, not just a "letter of warning". This seems especially important for a PAC that launched fully formed.

On to the complaint. The "United For Portland" group, which I believe is a PAC, has begun sending messages via Twitter and elsewhere. I saw a 30-second video on Twitter from them, posted at 7:56pm on October 7. This video violates basically every standard for funding disclosures other than simply answering the question of "does it have a funding disclosure?".

This video was literally the PAC's first tweet. It is by every possible interpretation a "professionally produced video". Here's the link:

<https://twitter.com/unitedforpdx/status/1314036899917389824>

As I write this there are 109k views and 300 likes on the video. The funding disclosure is at the end and is not easily readable, which violates the spirit and the letter of the campaign disclosure laws.

In detail, let me describe this situation. First, this is a short post to the campaign's Twitter account. Short posts are somewhat exempt from the disclosure rules. However, professionally-produced video clips are NOT. This is clearly not a quick video clip posted by an intern.

I have archived and analyzed the highest-quality version of the video that I could find from Twitter. It is 718x404 pixels at 24 frames per second, 30 seconds in length. Ignoring a few frames where the text is 'fading in', the campaign disclosure information is visible for 100 frames (just over 4 seconds). There are several problems here, but it very obviously fails to meet any objective or subjective standard of being "prominently disclosed".

1. Reading speed: The text is shown for 4 seconds. In addition to the list of disclosed funders, the text above it says "Reject Sarah Iannarone", "Portland needs a leader. Not a Tweeter" and "PAID FOR BY UNITED FOR PORTLAND" (16 words). At a rule of thumb, a proficient reader can read around 250 words per minute, or 17 words in 4 seconds. The campaign disclosure list is 79 words in addition to the 16 words before the list.

2. Readability: font size. The campaign communication, "Reject Sarah Iannarone", is 27 pixels in height, then "Portland needs a leader. Not a Tweeter" is 32 pixels. The funding title ("PAID FOR BY UNITED FOR PORTLAND") is shown at 18 pixels in height. The list of contributors is also 18 pixels in height. Clearly this fails the guideline of "same or larger font

size as in communication". In other sections of the video the campaign communication font is even larger. For example, "Denounce Arsonists", red text on yellow background, is approximately 34 pixels in height. "Sarah Iannarone spends a lot of time tweeting", is 60 pixels high.

3. Readability: font width. Not only is the disclosure smaller than the campaign communication, but it is also given in an incredibly narrow font to make it fit. This makes it even more difficult to read.

4. Readability: compression. The miniscule size means much of it is unreadable simply given lossy video compression. The attached frames are given with no further lossy compression (note file extension of 'png'). For the benefit of the doubt, I extracted the keyframes. These should have the least amount of compression loss. There were only 12 keyframes; the one with funding disclosures is keyframe012.png. Many words are only readable from knowing the context- for example, "Building Investors", "insurance". Between contrast, font size, font width, and compression, I'm actually unsure about the entry that says "NA*** Oregon Chapter". It says 'real estate', or I would have guessed that was "NAACP Oregon Chapter".

5. Readability: contrast. The "contrasting color text" interpretation is subjectively violated. This can be judged in the frames and keyframes: the right half of the white text is placed over a light background, and the left half is placed under rolling/animated video. By comparison, key messages in the video are either black-on-white or red-on-yellow (see keyframe010.png, keyframe007.png, keyframe003.png).

I've included the referenced keyframes from above, as well as a sampling of standard frames from the video.

Please investigate this complaint. The video and the PAC are clearly experienced and well-informed operators, and I ask that it be evaluated with this in mind.

40,000+ TIMES



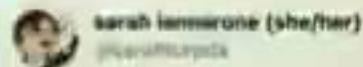
Sarah Lawrence (sln/tw)

Twitter

I am antifa.

11:16 PM · Nov 26, 2019 · Twitter

Sarah Lannarone spends a lot of time tweeting



sarah lannarone (she/her)

@sarahlannarone

I am antifa.

7:10 PM · Sep 25, 2019 · Twitter



sarah lannarone (she/her)

@sarahlannarone

I just yelled "F*ck you," at the screen so hard.

8:30 PM · Mar 25, 2020 · Twitter



sarah lannarone (she/her)

@sarahlannarone

The U.S. is such an irredeemable shithole under Trump.

10:24 PM · Jun 12, 2019 · Twitter



sarah lannarone (she/her)

@sarahlannarone

Dear elected officials, instead of pandering to NIMBYs, please tell them to go f*ck themselves?

1:02 PM · Jul 15, 2019 · Twitter



The Oregonian

October 4, 2020

“... her statements and messages on social media are strikingly cutting...”

“vilifying people”

lannarone was asked 4 times to:

Condemn Violence



Denounce Arsonists





Sarah Iannarone:

Source: KGW TV, 8/17/2020

“Peaceful protests not moving conversation forward.”



**Reject Sarah Iannarone
Portland needs a leader.
Not a Tweeter.**



PAID FOR BY UNITED FOR PORTLAND

Top contributors: Alliance PAC (local political organization); top three contributors: Nike, Inc. (footwear manufacturer), The Standard (finance and insurance), Portland General Electric Co. (other electric power generation); PMAR PAC (local political organization); top three contributors: OR PAC (Oregon Realtors® PAC), Kathy Querin (Portland Metropolitan Association of Realtors®), Kurt Von Wasmuth (Regional MLS); NAIOP Oregon Chapter (commercial real estate development association); Singer Family LLC (real estate and rental and leasing); Hoyt Building Investors (real estate and rental and leasing)

Sarah Lannarone spends a lot of time tweeting



sarah lannarone (she/her)

@sarahlannarone

I am antifa.

11:38 PM · Sep 28, 2019 · Twitter



sarah lannarone (she/her)

@sarahlannarone

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Condemn Violence



Denounce Arsonists






Sarah Iannarone:

Source: KGW TV, 8/1/2020

“Peaceful protests not moving conversation forward.”

A woman with short dark hair and glasses, wearing a light blue collared shirt and a grey blazer, is speaking in a video frame. The frame is surrounded by a black film strip border. A white speech bubble with a blue border is positioned to the right of the woman, containing the text "Reject Sarah Iannarone".

Reject Sarah Iannarone

PAID FOR BY UNITED FOR PORTLAND

Top contributors: Alliance PAC (local political organization); top three contributors: Nike, Inc. (footwear manufacturer), The Standard (finance and insurance), Portland General Electric Co. (other electric power generation); PMAR PAC (local political organization); top three contributors: OR PAC (Oregon Realtors® PAC), Kathy Querin (Portland Metropolitan Association of Realtors®), Kurt Von Wasmuth (Regional MLS); NAOP Oregon Chapter (commercial real estate development association); Singer Family LLC (real estate and rental and leasing); Hoyt Building Investors (real estate and rental and leasing)