



P O R T L A N D  
CITY AUDITOR  
**Elections**

October 26, 2020

United for Portland  
3321 SE 20th Ave  
Portland, OR 97202

**DELIVERED ELECTRONICALLY**  
joel.corcoran@gmail.com

### **NOTICE OF DETERMINATION**

Campaign Regulation Complaint No.: 2020-44-UP  
**- No Violations -**

Dear United for Portland,

On October 8, 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 disclosure of required funding information on an election-related video posted on social media by the political committee, United for Portland, as well as on the political committee's website.

**After an investigation, I identified no violations of City campaign finance regulations based on a lack of prominent display of funding disclosures by United for Portland.**

#### **1. No Violation of City Campaign Finance Regulations**

*Twitter video did not fail to prominently disclose required funding information*

On October 7, 2020, an elections-related video was posted on Twitter by political committee United for Portland. Complaint No. 2020-44-UP alleged the professionally-produced video failed to prominently disclose required funding information due to insufficient font size, disclosure display time, and font contrast.

[City Charter Section 3-303\(c\)](#) and corresponding [PCC 2.10.030\(C\)](#) require disclosures be current to within five business days of transmission of City candidate election-related videos. Since October 7, 2020 is the transmission date for the video at issue in this complaint, the video's funding disclosure was required to be current within the range of September 30, 2020 to October 7, 2020. However, the first contributions received by United for Portland did not occur until October 6, 2020,<sup>1</sup> one day prior to the video's posting. Because there was a period of time within the five business day timeframe

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<sup>1</sup> According to the Oregon System for Tracking and Reporting (ORESTAR), United for Portland received its first two contributions on October 6, 2020 (Transaction IDs: 3627437 and 3627434).



where there were no contributions to disclose, the video was not required to include funding disclosures in its transmission. **Therefore, the Auditor's Office finds no violation of campaign finance regulations for any deficiencies in the disclosure that was not required.**

However, it is noteworthy to mention that had a funding disclosure been required on the video, the disclosure was not readily comprehensible in terms of readability for a person with average reading and vision faculties due to the font size and clarity. The Auditor's Office strongly encourages United for Portland to remedy any such similar deficiencies on future videos that require funding disclosures.

## **2. No Violation of City Campaign Finance Regulations**

*Website did not fail to prominently disclose required funding information*

The current complaint also alleged that required funding information on United for Portland's website was not prominently disclosed because of insufficient font size. The Auditor's Office finds that the required disclosure was not significantly smaller than the text included on the remainder of the website. **Therefore, 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