

From: [James Ofsink](#)
To: [City Elections](#)
Cc: sarah@sarah2020.com; info@sarah2020.com; [Scroggin, Deborah](#); [Hansen, Louise](#)
Subject: Re: PLEASE READ: Notice of Complaint No. 2020-48-SI
Date: Thursday, November 5, 2020 11:41:13 AM
Importance: High

Dear Louise Hansen, City Elections Officer-

The communication referenced in complaint 2020-48-SI does not require disclosures as there is nothing to disclose. No money was paid for the creation of the video and the efforts of the volunteers who created it are not contributions. ORS 260.005(3)a defines a contribution as including:

“The payment, loan, gift, forgiving of indebtedness, or furnishing without equivalent compensation or consideration, of money, services other than personal services for which no compensation is asked or given, supplies, equipment or any other thing of value...”

Personal services for which no compensation is asked or given are not contributions and thus not reported or disclosed. Similarly to a bookkeeper who volunteers their time and expertise serving as a treasurer, an artist who does volunteer graphic design, or a campaign consultant who volunteers strategic advice, the effort that went into the creation of this video is not a contribution and thus is not subject to disclosure.

Please let me know if there is any additional information we can provide.

Thank you for your diligence.

James Ofsink

Treasurer, Friends of Sarah for Portland

On Oct 29, 2020, at 9:07 AM, City Elections <elections@portlandoregon.gov> wrote:

Hello Sarah Iannarone and Friends of Sarah for Portland,

Please see the attached complaint and related timeline for response regarding allegations of campaign disclosure violations. If you have any questions, please be in touch directly.

Sincerely,

Cody Sibley

Cody.sibley@portlandoregon.gov

He/Him/His

Elections Coordinator

Office of the City Auditor | City of Portland

<2020-48-SI Notice of Complaint.pdf><Complaint re Sarah Iannarone for Mayor
election ad - 2020-1028.pdf>