



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

**COMPLAINT NO. 2020-31-TW**  
**AUDITOR'S OFFICE INITIATED COMPLAINT**  
**CITY OF PORTLAND**

**COMPLAINANT:**

**City Auditor's Office**

City of Portland  
1221 SW 4th Ave, Room 130  
Portland, OR 97204  
elections@portlandoregon.gov

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**RESPONDENT(S):**

**Ted Wheeler**

PO Box 42307  
Portland, OR 97242

**Friends of Ted Wheeler**

3321 SE 20th Ave  
Portland, OR 97202  
campaign@tedwheeler.com  
amy@tedwheeler.com

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**Law/Code/Charter/Rules:**

Portland City Charter §3-301(a)–(b)(1)  
Portland City Code Ch. 2.10.010A.–B.1.

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**Summary:**

The City Charter and City Code require the Auditor's Office to issue a complaint when provided a reason to believe that a violation of Campaign Finance Regulations may have occurred. See Portland City Charter 3-305(d) and Portland City Code Ch. 2.10.050 D.

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City of Portland  
1221 SW 4<sup>th</sup> Avenue, Room 310, Portland, OR 97204  
(503) 823-3546  
[www.portlandoregon.gov/auditor/elections](http://www.portlandoregon.gov/auditor/elections)



On July 8, 2020, the Auditor's Office received information providing a basis for belief of potential violation(s) of Campaign Finance Regulations by Friends of Ted Wheeler. The Auditor's Office initiates this complaint to pursue further investigation.

**Allegation(s):**

The Auditor's Office alleges violation(s) of Campaign Finance Regulations, in that Friends of Ted Wheeler received one or more contributions from individuals that exceeded the \$500 limit per election cycle per individual contributor.

1. Ted Wheeler is the current mayor and the incumbent mayoral candidate for the November 3, 2020, General Election. Ted Wheeler is a Candidate as defined in Portland City Code Ch. 2.10.080 A.
2. Friends of Ted Wheeler is the principal campaign committee of Ted Wheeler, and is a Candidate Committee as defined in Portland City Code Ch. 2.10.080 B.
3. On July 8, 2020, the City of Portland Election's Office received an email from Friends of Ted Wheeler that included the following information:
  - a) Ted Wheeler and Friends conducted a self-assessment of its records, looking back to post-General Election November 2016.
  - b) After a review of its records, Friends of Ted Wheeler identified seven donations of concern that occurred after May 4, 2020.
  - c) Each of the seven donations identified was from individual contributors and in excess of \$500.
  - d) The total contribution amount received by Friends of Ted Wheeler for the seven identified donations was \$3,250.
  - e) After identifying the above donations of concern, Friends of Ted Wheeler refunded the funds in question to the respective donors.
4. Ted Wheeler and Friends violated campaign contribution limitations by receiving contributions from individuals during the same election cycle that were more than \$500 per individual.

**Timeline for Response and Investigation:**

Under Portland City Code Section 2.10.050 E. 3., you have until 5:00 PM on August 21, 2020, to submit a written response to this complaint along with any relevant, supplemental materials. Please submit any such materials electronically, using the above-referenced case name, to [elections@portlandoregon.gov](mailto:elections@portlandoregon.gov). At this time, the Auditor's Office can only guarantee receipt of materials if sent by email.

After the 10-business-day period for submitting the written response, our office will render a decision within another 10 business days.

Thank you for your attention to this matter.

DATE: August 7, 2020

Prepared by:

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  
City of Portland Auditor's Office