



P O R T L A N D  
CITY AUDITOR  
Elections

**COMPLAINT NO. 2020-31-RS**  
**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

**RESPONDENT:**

**N Robert Stoll**

209 SW Oak Street, Fifth Floor  
Portland, OR 97204  
rstoll@ssbls.com

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

Portland City Charter Section 3-301(a)-(b)(1)  
Portland City Code Section 2.10.010 A.- 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 City campaign finance regulations may have occurred. See Portland City Charter 3-305(d) and Portland City Code (PCC) 2.10.050 D.

On September 1, 2020, the Auditor's Office received information providing a basis for belief of potential violation(s) of City campaign finance regulations by individual contributor, N Robert Stoll. The Auditor's Office initiates this complaint to pursue further investigation.

**Allegation(s):**

The Auditor's Office alleges violation(s) of City campaign finance regulations, in that N Robert Stoll contributed to the campaign for mayoral candidate, Ted Wheeler, in excess of campaign contribution limits within the same elections cycle.

According to City regulations and information received by the Elections Office:



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 PCC 2.10.080 A.
2. Friends of Ted Wheeler is the principal campaign committee and candidate committee of for candidate Ted Wheeler, as defined in PCC 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 in excess of \$500 and donated by individual contributors.
  - 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. On September 1, 2020, the Election's Office received an email with additional information on the identities of the seven contributors of concern that donated to Friends of Ted Wheeler, as referenced in the July 8, 2020 email. N Robert Stoll was identified as a contributor to Friends of Ted Wheeler in the September email.
5. N Robert Stoll is an individual.
6. N Robert Stoll violated the City's campaign contribution limits set for individuals by contributing more than \$500 to candidate Ted Wheeler during the same election cycle.

**Timeline for Response and Investigation:**

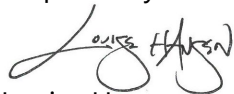
Under Portland City Code Section 2.10.050 E. 3., you have until 5:00 PM on September 28, 2020, to submit a written response to this complaint along with any relevant, supplemental materials. Please submit any such materials electronically, using the above-referenced case name, to [elections@portlandoregon.gov](mailto:elections@portlandoregon.gov). 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: September 14, 2020

Prepared by:



Louise Hansen

City Elections Officer

City of Portland Auditor's Office