

CITY OF PORTLAND

**In the Matter of: Violations of
Campaign Contribution
Limits of Portland Charter
Chapter 3, Article 3, and
Portland City Code Chapter
2.10**

No. 2020-05-OG

INITIAL RESPONSE TO COMPLAINT

**Alleged Violations of Portland Campaign
Disclaimer Requirements by Campaign of Ozzie
González for Mayor**

While the Friends of Ozzie González campaign intends to vigorously and tenaciously defend its response to this Complaint, line item by line item - if necessary- in a secondary Response; however, since this Complaint is defective on its face, I respond simply:

This Complaint is defective and void on its face, for the following reasons:

1) Certain items in this Complaint mention names NOT affiliated with our Campaign; i.e: “*twitter.com/ted-mayor*”; & “*the top 5 dominant contributors to the Wheeler campaign*”. Since there is nobody on our Campaign by the name of Ted nor Wheeler, this Complaint is defective.

Therefore, this Complaint is moot.

The Friends of Ozzie González campaign contends that it has brought its website into compliance with the provisions of the cited Charter Chapter & City Code. In addition, our Campaign contends that we are in the process of working diligently to bring our Facebook site, and YouTube site into compliance with the same.

In addition, the Friends of Ozzie González campaign contends that the current one-page document titled *Guidance on Disclosure Requirements in City of Portland Candidate Campaigns*, is unclear on several items with respect to when the rule applies, such as the use of digital communication methods that do not incur a cost. Based on the allegations in the Complaint, there are many candidates who can be considered out-of-compliance in more than one area, so we see a need for examples of compliant and non-compliant communications, so there is an easier way to know when we may be out of compliance.

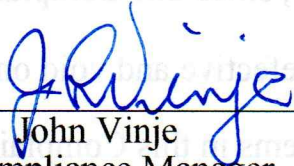
Our Campaign – along with many others we assume – look forward to some additional guidance and specificity from the City Auditors Office on each of the items listed on the *Guidance on Disclosure Requirements in City of Portland Candidate Campaigns* and any other items that could be similar in nature to those items listed.

The Friends of Ozzie González contends that they are: 1) either in compliance or working diligently to be in compliance on some of these platforms; 2) that the other requirements for certain platforms are arbitrary & capricious, and cannot be realistically complied with and should not be enforced, .

The Friends of Ozzie González requests that any determination by the City Auditor's Office be forwarded by mail to our Suburban Campaign Headquarters address and also be emailed to:
a) mail@ozzie4pdx.org; and, b) john@ozzie4pdx.org.

Dated: May 4, 2020

Friends of Ozzie González


By: John Vinje
Compliance Manager
Friends of Ozzie González