

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. 2020-14-SA

UPDATE TO COMPLAINT

Violations of Portland Campaign Contribution Limits by "Sam Works for Portland" and Friends of Sam Adams

1. On May 12, 2020, a Complaint was filed by Seth Woolley and David Delk, residents and electors of Portland, indicating violations of the Portland Campaign Contribution Limits by Sam Works for Portland and Friends of Sam Adams.
2. At that time, Sam Works for Portland, an Oregon miscellaneous committee, had reported only one contribution (\$1,000 from The Standard [insurance company]) on ORESTAR, even though all contributions and expenditures must be reported within 7 days during the 42 days preceding a primary election.
3. Since then, these additional contributions to Sam Works for Portland have been reported:

Tran Date	Contributor/Payee	Sub Type	Amount
05/15/2020	NW Carpenters Union	In-Kind	\$34232.95
05/13/2020	SEIU Local 49 COPE Fund (4213)	In-Kind	\$49468.41
05/13/2020	NW Carpenters Union	In-Kind	\$5767.05
05/02/2020	The Standard	Cash	\$1000.00
			\$90,468.00

4. Sam Works for Portland has still reported no expenditures on ORESTAR.
5. The ORESTAR filings to date indicate that the brochure production and mailing done by Sam Works for Portland constituted a coordinated expenditure far greater than \$500, which constitutes a

contribution to Friends of Sam Adams in excess of the \$500 limit at Portland Charter § 3-301(b)(1).

6. Friends of Sam Adams has reported no in-kind contributions from Sam Works for Portland.
7. Regardless of the violations of Oregon contribution and expenditure reporting requirements by Sam Works for Portland and Friends of Sam Adams, the brochure clearly violates the Portland Campaign Contribution Limits, because it is an in-kind contribution to Friends of Sam Adams by a political committee in excess of \$500 during the current election cycle.
8. Complainants request that all correspondence to them in this matter be addressed to delk@honest-elections.com and to seth@honest-elections.com.

Dated: May 15, 2020

Respectfully Submitted,

/s/ David Delk

/s/ Seth Woolley

David Delk

Seth Woolley