

CITY OF PORTLAND

In the Matter of: Violations of
the Disclaimer Requirements
of Portland Charter Chapter 3,
Article 3, and Portland City
Code Chapter 2.10

No. _____

COMPLAINT

Violations of Portland Campaign Disclaimer Requirements by the Keith for Portland Committee

1. This Complaint is filed by Moses Ross, David Delk, Seth Woolley, and Ronald Buel, residents and electors of Portland.
2. This Complaint is pursuant to Portland Charter § 3-305 and Portland City Code 2.10.050.
3. The Keith for Portland Committee has violated the disclaimer requirements of Portland Charter Chapter 3, Article 3, and Portland City Code Chapter 2.10 ("Portland Campaign Disclaimer Requirements") by failing to include the required disclaimers in a TV ad which aired on CNN on May 14, 2020, and perhaps on other channels and other dates as well.
4. The TV ad violates Portland City Charter § 3-303(a)(2), because it displayed no disclaimer identifying the Dominant Contributors to the campaign of Keith Wilson. It states only "Paid for by Keith for Portland" on the screen at the end and has no audio disclaimer.
5. The Keith for Portland campaign is well aware of its Dominant Contributors, which are listed at the bottom of the homepage of its website as:

Paid for by Keith for Portland (dominant contributors and industry from which they received the majority of their income over the last five years are: Keith Wilson - LTL long-distance freight trucking; Daylight Transport - LTL long-distance freight trucking; Dina McNight - LTL long-distance freight trucking; Delaney Christian - Advertising agency consulting services; Erich Christian - Industrial engineering services)

6. Each viewing of this TV ad by a person is a separate violation of the disclaimer requirements.
7. The penalty for violation of the disclaimer requirements is "imposition of a civil fine which is not less than two nor more than twenty times the amount of the unlawful Contribution or Expenditure or Independent Expenditure at issue." Portland City Charter § 3-305(b).
8. The "amount of the unlawful Contribution or Expenditure or Independent Expenditure at issue" is the amount spent by the Keith for Portland Committee to create, produce, reproduce, print, and distribute the TV ad.
9. Complainants request that the City Auditor:
 - (a) Find that the Keith for Portland Committee is in violation of the Portland Campaign Disclaimer Requirements;
 - (b) Impose the lawfully-required penalty for this violation.
10. Because the violation here is blatant, obvious, and egregious, and shows disregard for the requirements of the Portland City Charter, Complainants request that the maximum available penalty be imposed.
11. Complainants request that all correspondence to them in this matter be addressed to delk@honest-elections.com, buel@@honest-elections.com, seth@honest-elections.com, and moses@honest-elections.com.

Dated: May 15, 2020

Respectfully Submitted,

/s/ David Delk

David Delk

/s/ Seth Woolley

Seth Woolley

/s/ Moses Ross

Moses Ross

/s/ Ronald Buel

Ronald Buel