

From: Joe Baessler <joe@oregonafscme.org>
Sent: Tuesday, June 2, 2020 12:52 PM
To: Scroggin, Deborah <Deborah.Scroggin@portlandoregon.gov>
Subject: Complaint against Oregon AFSCME for donation to Mayor Wheeler

Ms. Scroggin,

I wanted to respond to the complaint filed against us for a violation of our \$500 donation to Mayor Wheeler's re-election campaign. We acknowledge that we made a mistake, but we did so in good faith, which we request be taken in consideration in the issuance of any penalty. ARA 13.02.

We understood that the City's campaign finance laws became effective after the Oregon Supreme Court decision and reviewed that law before making our contribution. At that time, we reviewed PCC 2.10.020 and clearly understood that contributions greater than \$500 were prohibited, except from "small donor" political committees. However, we did not understand that *no* contributions were permitted from an entity like AFSCME Council 75 -- we should have. Again, we just thought we were limited to a \$500 contribution. We therefore made the contribution and reported it in OreStar.

Upon receipt of the complaint, we looked more closely at the code (including the definition set out in PCC 2.10.080) and realized that the law prohibits *any* contribution from an entity (i.e., something other than a human being), except for registered political committees. AFSCME Council 75 does not have a separate state (or local) political committee at this time. Our contributions are made directly from the organization, consistent with state and federal law, and reported as such by the receiving campaign. We assumed this was permitted. Moving forward, we will be certain to comply with the new regulation.

Thank you for your consideration. Again, we honestly believed that we were complying with the new law and apologize for our error.

Joe Baessler
Associate Director
Oregon AFSCME