

City of Portland Campaign Finance Complaint Form

This document serves as the complaint form for reporting alleged violations of the City of Portland's campaign finance regulations (City Code Chapter 2.10 and City Charter Chapter 3, Article 3). Before completing this form, please review the information provided below.

Note: This form pertains to complaints regarding alleged violations of the City's campaign finance regulations, including contribution limits and funding disclosures. To issue complaints alleging violations of the City's public campaign financing program, Open and Accountable Elections, please email openelections@portlandoregon.gov.

Who may file a complaint alleging violations of Portland's campaign finance regulations?

Any person may file a written complaint with the City Auditor's Office using this form.

What information is required to submit a complaint about Portland's campaign finance regulations?

For the Auditor's Office to investigate complaints, the following information is needed:

- The names of the individual, candidate, political committees, or other entity alleged to have violated the City's campaign finance regulations;
- A description of the alleged violation (for example, the contribution alleged to have been made or received, a voter communication that lacked a required disclosure);
- The dates of the alleged violations; and
- If known, any applicable dollar amount associated with the complaint.

What type of complaints will be investigated?

The Auditor's Office will investigate violations of the following sections of campaign finance regulations that occurred after September 1, 2019:

- Communication disclosure requirements in City Code Section 2.10.030.
- Payroll deduction requirements, described in City Code Section 2.10.010 C.
- ORESTAR registration requirements described in City Code Section 2.10.020 B.

The Auditor's Office will investigate violations of the following sections of campaign finance regulations that occurred after May 4, 2020:

- Campaign contribution limits in City Code Section 2.10.010, except for B. 3. (self-funding limitation).

Information on Portland's campaign finance regulations can be found on the [City's campaign finance website](#):

- [Campaign Finance FAQ](#)
- [Portland City Code Chapter 2.10/Portland City Charter Chapter 3, Article 3](#)
- [Campaign Finance Administrative Rules](#)



I. Complainant Contact Information

** The Auditor's Office strongly encourages you to provide your **email address**, especially in light of modified practices implemented by our office in response to the COVID-19 crisis.*

First and Last Name	Clint Culpepper
Date (mm/dd/yyyy)	10/01/2020
Email (preferred)	clintculpepper@gmail.com
Mailing Address	1234 NE Failing St. Portland, OR 97212

Would you like your contact information to remain confidential?

Please note: If a complainant requests that their name and contact information be kept confidential, the Auditor's Office will protect identifying information from disclosure unless ordered otherwise by a court authority.

II. Subject(s) of the Complaint

Name or entity	Violation Type <i>Please select all that apply</i>			
<i>For additional complaint subjects, complete a new complaint form.</i>	Timely Disclosure	Campaign Contribution Limit	ORESTAR Registration	Payroll Deduction
1. Ted Wheeler	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

III. Complaint Summary

In the space provided, provide a detailed summary of the alleged violation(s). Attach additional pages, as necessary.

The top five donors noted in this email from the Ted Wheeler campaign do not accurately reflect the top five donors to Ted Wheeler's campaign at the time of this email. The top donor to the campaign was the candidate himself in the amount of \$150,000 with the donation being made on 9/18/2020.

This is a violation of the communication disclosure requirements in City Code Section 2.10.030.

IV. Supporting Documentation

Complainants are encouraged to submit any supporting documentation with their complaint. Supporting documents may include pictures, multi-media, paper documents, spreadsheets, or anything else that supports the complaint, such as:

- ORESTAR transactions or other evidence of contributions
- Screenshots and photos of voter communications
- Videos of voter communications

Choose Files

If you are unable to upload documentation to this form, please email the documentation, along with the associated complaint form, to elections@portlandoregon.gov.

V. Submit

By sending your complaint, you certify the information provided on and in connection with this form is true and correct to the best of my knowledge.

When you have provided all the necessary information, click on the submit button below. If you have trouble submitting your complaint form, please save it as a PDF and email the form to elections@portlandoregon.gov.

Submit Complaint



36 hours and counting...

Ted Wheeler <info@tedwheeler.com>


Tue, Sep 29, 2020 at 12:00 PM



5 WEEKS

until the election on
November 3, 2020

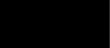
15 DAYS

until **ballots are mailed** to voters

36 HOURS

until the end of month
fundraising deadline

DONATE

 am so grateful for your support ahead of this important deadline. With your help, we will finish strong in the final weeks of this campaign.


Sincerely,



TED WHEELER
Mayor of Portland

Paid for by Friends of **Ted Wheeler**, P.O. Box 42307, Portland, OR 97242.

Top five contributors: Local 48 Electricians PAC (Labor Unions and Similar Labor Organizations), top three contributors: Richard Blair (Electrical Contractors and Other Wiring Installation Contractors); Timothy Hayes



(Electrical Contractors and Other Wiring Installation Contractors); Darren Chapman (Electrical Contractors and Other Wiring Installation Contractors). SEIU Local 49 (Labor Unions and Similar Labor Organizations), top three contributors: Felisa Hagins (Labor Unions and Similar Labor Organizations); Jacy Laplante (Direct Health and Medical Insurance Carriers); Myongcha Clinton (Janitorial Services). Melvin Mark Properties LLC (Nonresidential Property Managers). Portland Metro Fire Fighters PAC (Labor Unions and Similar Labor Organizations), top three contributors: Estate of James R. Kluge (Trusts, Estates, and Agency Accounts); Eric Pedersen (Fire Protection); Bryan Profit (Fire Protection). Melvin Mark Brokerage Co. (Offices of Real Estate Agents and Brokers).

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Friends of Ted Wheeler · 3321 SE 20th Ave, Portland, OR 97202, United States
This email was sent to [REDACTED] To stop receiving emails, [click here](#).
You can also keep up with Friends of Ted Wheeler on [Twitter](#) or [Facebook](#).

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Created with [NationBuilder](#), software for leaders.

Subject: Complaint against Friends of Ted Wheeler for 20.10.030 Timely Disclosure of Large Contributions and Expenditures
Date: Thursday, October 1, 2020 at 4:10:34 PM Pacific Daylight Time
From: Tony Jordan
To: City Elections
Attachments: IMG_1348.jpg

To Whom it May Concern,

I wish to file the following complaint against the Friends of Ted Wheeler campaign.

I believe that the organization named violated 20.10.030 Timely Disclosure of Large Contributions and Expenditures by not keeping the website at <https://tedwheeler.com/> up to date regarding top contributors.

On September 18, 2020, Ted Wheeler made a personal contribution to his campaign in the form of a no-interest loan in the amount of \$150,000 (ORESTAR transaction #3579438), such a contribution certainly places Mayor Wheeler in the Top Five individual contributors to his campaign.

On October 1, 2020, the attached screenshot was taken on the website <https://tedwheeler.com> which does not list Ted Wheeler as a Top Five individual contributor. It has been more than 5 business days since the contribution was made.

Sincerely,
Tony Jordan



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