



P O R T L A N D
CITY AUDITOR
Elections

October 29, 2020

Public Affairs Office
Reed College
3203 SE Woodstock Blvd
Portland, OR 97202

DELIVERED ELECTRONICALLY
public.affairs@reed.edu

NOTICE OF DETERMINATION
Campaign Regulation Complaint No.: 2020-45-RC
- No Violation -

Dear Reed College,

On October 19, 2020, the City of Portland Auditor's Office received the complaint named above, alleging campaign disclosure violations of [Portland City Charter Section 3-303](#) and corresponding [Portland City Code \(PCC\) Section 2.10.030](#). Specifically, the complaint alleged a Reed College email advertising the participation of a current City candidate in a college event was a communication to voters that lacked prominent disclosure of funding information.

After an investigation, I identified no violations of City campaign finance regulations.

1. No Violation of City Campaign Finance Regulations

Promotional email did not lack prominent disclosure of required funding information

On October 19, 2020, Reed College's Office of Public Affairs distributed an email to a Reed College Community email recipient list for an upcoming panelist discussion on 2020 elections. The event was advertised to include City Council Position 4 candidate, Mingus Mapps, as the moderator. The email stated Mingus Mapps was "currently running for Portland City Council," and provided a link to his campaign website for more information.

Complaint No. 2020-45-RC alleged the email at issue failed to prominently disclose required funding information. However, [City Charter Section 3-303](#) and corresponding [PCC 2.10.030](#) require funding disclosures only for communications to voters related to City candidate elections. As explained below, I find the communication was not directed to voters and was not related to a City candidate election.

First, I find the email at issue was not a communication to voters subject to regulation, but a communication primarily to a college community. The email was sent to "Reed College Community" and the college's response confirmed the email was sent to students, faculty, and staff.

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Second, the email details do not sufficiently indicate this event was related to the upcoming City candidate election, but that the event related to perspectives of Reed professors and alumni on the 2020 elections generally. Supportive of this interpretation, Reed College asserted that promotion of the event was “not about Mingus Mapps[’s] political campaign activities.” The college clarified that Mingus Mapps was selected as a moderator and therefore featured in the email due to his alumnus status and academic background. The college further stated the event was organized to be an “entirely educational non-partisan exercise,” and that the college “does not support or oppose any candidates or political party.” In conclusion, the mere mention of fact that a moderator is a current City candidate along with a campaign website link is incidental information and insufficient to categorize this communication as related to a City candidate election.

Therefore, I find there is no violation because the email at issue was not a voter communication related to a City candidate election.

As an aside, Reed College relayed in its response that candidate Mingus Mapps was no longer participating in this planned event, and that new communications were dispersed to indicate this change. The college also indicated no panelists were offered funds to participate, that the event was free, and that the event was not a fundraising event. As such, the concerns raised by Complainant regarding unlawful expenditures on the event are now also moot.

Appeals

Pursuant to PCC 2.10.050 I., an appeal may be filed with the Multnomah County Circuit Court within 30 days of the issuance of a decision.

Sincerely,

A handwritten signature in black ink that reads "Louise Hansen". The signature is written in a cursive style with a large, stylized "L" and "H".

Louise Hansen
City Elections Officer