



P O R T L A N D  
CITY AUDITOR  
**Elections**

**COMPLAINT NO. 2020-49-WITR**  
**AUDITOR'S OFFICE INITIATED COMPLAINT**  
**CITY OF PORTLAND**

**COMPLAINANT:**

**City Elections Office**

1221 SW 4th Ave, Room 130  
Portland, OR 97204  
elections@portlandoregon.gov

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**RESPONDENT(S):**

**Do Write PDX**

1776 NE Lombard Street  
Portland, OR 97211

**DELIVERED ELECTRONICALLY**

timothy.b.ramos@gmail.com  
writeinterestsaraiford@gmail.com

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**Law/Code/Charter/Rules:**

[Portland City Charter Section 3-303](#)  
[Portland City Code Section 2.10.030](#)

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**Summary:**

The Portland City Charter (Charter) and Portland City Code (Code) require the Auditor's Office to issue a complaint when provided a reason to believe that a violation of City Campaign Finance Regulations may have occurred. See [Charter Section 3-305\(d\)](#) and corresponding [Code Section 2.10.050 D](#).

On October 28, 2020, the Auditor's Office received information providing a reason to believe Do Write PDX violated City Campaign Finance Regulations. The Auditor's Office initiates this complaint to pursue further investigation.

**Allegation(s):**

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City of Portland  
1221 SW 4<sup>th</sup> Avenue, Room 310, Portland, OR 97204  
(503) 823-3546  
[www.portlandoregon.gov/auditor/elections](http://www.portlandoregon.gov/auditor/elections)





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The Auditor's Office alleges violation(s) of City Campaign Finance Regulations, in that Do Write PDX produced a communication to voters that did not include prominent disclosures as is required in Charter Section 3-303 and corresponding Code Section 2.10.030.

1. As defined in ORS 260.005(1)(a), Teresa Raiford was a City mayoral candidate for the May 19, 2020 Primary Election and the November 3, 2020 General Election.
2. Do Write PDX dba Write in Teresa Raiford is a political committee subject to the City's campaign disclosure regulations.
3. In October 2020, the City of Portland Election's Office investigated Complaint No. 2020-46-NU, in which a complainant submitted a screenshot of a text message alleged to be sent from Next Up Oregon dba Next Up Action Fund.
4. In its response to that complaint, Next Up Action Fund denied sending the text message in question.
5. The text message also included the statement, "This is Emily with the Write in Teresa Raiford Campaign." The text message did not include any additional funding information.
6. The text message did not include disclosures of any political committee's top five dominant contributors, the types of businesses from which those contributors obtained a majority of income over the previous five years, nor the types of businesses from which Do Write PDX obtained a majority of its income over the previous five years.
7. Text messages are subject to campaign disclosure regulations, and disclosures must be current to within 10 business days of transmission.

**Timeline for Response and Investigation:**

Under Code Subsection 2.10.050 E. 3., you have until 5:00 PM on November 25, 2020, to submit a written response to this complaint along with any relevant, supplemental materials. Please submit any such materials electronically, using the above-referenced case name, to [elections@portlandoregon.gov](mailto:elections@portlandoregon.gov).

At this time, the Auditor's Office can only guarantee receipt of materials if sent by email.

After the 10-business-day period for submitting a written response, our office will render a decision within another 10 business days.

Thank you for your attention to this matter.

DATE: November 10, 2020





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Prepared by:

Louise Hansen  
City Elections Officer  
City of Portland Auditor's Office

