

September 30, 2024

Louise Hansen  
City of Portland, Elections  
1221 SW 4th Avenue, Room 130  
Portland, Oregon 97204

*Delivered electronically via elections@portlandoregon.gov*

RE: Complaint No. 2024-04-CR

Ms. Hansen,

We have received notice of the anonymous complaint related to a video produced by a nonprofit and shared from their social channels to our social channels.

On August 19, Carmen Rubio attended an event organized and hosted by Portland for All, which to our understanding is a nonprofit. The topic of that event was largely focused on the partnership between the city of Portland and Multnomah County related to addressing homelessness, and it certainly fell into the category of public policy issues and civic engagement. Carmen spoke on a panel that also included a candidate for Multnomah County Commission and a former Multnomah County Commissioner. There were no other Mayor candidates at the event.

After the conclusion of the panel discussion, a gentleman who identified himself as a "volunteer" for the event approached Carmen and asked if he could interview her and record it. Carmen agreed and spent a few moments speaking with the volunteer before departing.

Subsequently, Portland for All posted the video on their social channels with the film business tagged - and we shared it to our channels, something that is routinely done by campaigns.

According to the State of Oregon Campaign Finance Manual, volunteer activities are non-reportable. It states:

*Generally, volunteer activities are non-reportable. An individual may volunteer personal services to a committee without making an in-kind contribution as long as the individual is not paid by anyone for performing the services.*

Because the gentleman identified himself as a volunteer, we assumed that he was not getting paid. We have reached out to Portland for All, an all-volunteer organization, to ask if this gentleman received payment for his time that day and we were told he was not - that he, in fact, was volunteering his time for the nonprofit.

We look forward to your advice. As the primary contact for Carmen for Portland, I am happy to meet on October 11 at 11:30am.

In this day and age, we are regularly approached by volunteers with electronic devices in this manner.

Sincerely,  
*Terri Waller*

Terri Waller  
Campaign Manager  
Carmen for Portland