

## **Response to 2024-09-RG**

November 5, 2024

To City of Portland Auditor's Office:

Please accept the following response to complaint 24-09-RG filed by Seth Wooley. Wooley's complaint is inaccurate, politically motivated and designed to draw negative media attention and consume limited staff resources in the final week of the campaign. The 2022 and early 2023 donations in particular have been in Orestar for nearly 2 years – to file this late complaint was all about attempting to prevent us an opportunity to cure and to maximize political fallout. Wooley is also attempting to reinterpret rules he does not like.

We work with C&E Systems, premiere treasury service and compliance experts that virtually every other local campaign also use. We have sought their guidance – and that of Tonkon Torp a major Oregon law firm – at many steps throughout our campaign with respect to campaign limits to ensure the utmost compliance.

**In response to Issue 1:** Our campaign sought guidance from the City and legal counsel prior to raising funds to retire prior debt. The Small Donor Program (SDE) fully approved this plan and communications with donors based on their feedback - including that maximizing donations during the debt retirement period would not prevent future donations from same donor in the 2024 election cycle. We relied in good faith on the city here. After those consultations with experts, the City, and our own interpretation, we believed then, and still believe now, what we did was appropriate and permitted under the rules.

Attached please see that correspondence.

Additionally, the SDE program is the more particularized city campaign finance program, was the primary investigator in the 2022 election cycle for us and was the only city program that was responsive to our campaign during the post-election debt retirement cycle (which was a very short window).

There is compelling public policy reasons for the post-election debt retirement window. In this case, our campaign was crippled by a false SDE complaint in which a major fine was initially imposed. We had no choice but to appeal the fine late in the campaign. Both the potential fine and the legal fees to appeal it were unexpected expenditures that we could not have planned for.

Eventually, an administrative law judge determined we had complied with "overwhelming evidence," however, we did not get an invoice from our law firm until very, very late. To cripple the "next" campaign because of liabilities from a prior campaign is not only unfair,

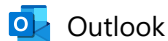
but in fact may violate separate donation and expense limits. The post-elect debt retirement window is essential for these reasons.

**In response to Issue 2:** Our campaign has refunded donation overages as soon as they've been identified. Donors are often confused about donation limits or forget the amount they've donated, leading to the need for occasional corrections and refunds. Unfortunately, there is no automated system for preventing those overages before they occur. The process for catching and resolving them is manual.

**Regarding the attached excel spreadsheet:** There are likely inaccuracies in this document and a thorough review will require more time. For instance, David Angeli has already responded to clarify that what was labeled as his "second" donation was actually a donation from his wife Courtney and they share a checking account, yet our campaign mistakenly refunded that donation.

Sincerely,

Amy Wood  
Campaign Manager



Outlook

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**RE: Small Donor Questions**

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**From** Mottet, Susan <Susan.Mottet@portlandoregon.gov>**Date** Mon 12/19/2022 2:42 PM**To** Rene Gonzalez <rene@artifexpartners.com>; darian.stanford@tonkon.com <darian.stanford@tonkon.com>**Cc** Shah Smith <shah@renewforportland.com>; Natalie Offenbecher <natalie@summitfinancenw.com>; Hansen, Louise <Louise.Hansen@portlandoregon.gov>; Lamboley, Becky <Rebecca.Lamboley@portlandoregon.gov>

Now I'm adding Darian, too.

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**From:** Mottet, Susan**Sent:** Monday, December 19, 2022 2:42 PM**To:** Rene Gonzalez <rene@artifexpartners.com>**Cc:** Shah Smith <shah@renewforportland.com>; Natalie Offenbecher <natalie@summitfinancenw.com>; Hansen, Louise <Louise.Hansen@portlandoregon.gov>; Lamboley, Becky <Rebecca.Lamboley@portlandoregon.gov>**Subject:** RE: Small Donor Questions

I am adding Louise and Becky from the Auditor's office to this chain, since the goal is to align Small Donor compliance answers with answers from their office on how to comply with the campaign finance regulations that they enforce.

1. Donations between November 9<sup>th</sup> and December 23<sup>rd</sup>. Wanted to confirm that under small donor program that donations during this period would not preclude or limit what donors could give in seed money or matching contributions. For example, if some gave \$250 (or \$500) today, could they still give seed money, permissible contributions or matching contributions next year or in 2024?

I can confirm for Small Donor Elections that we don't govern what the campaign raises after November 8, 2022 and before December 23, 2022. Our rules apply starting on December 23, 2022. We wouldn't count what the campaign collected as seed money if it was collected before December 23, 2022. However, if the campaign account carries forward a balance on December 23, 2022, unless it was transferred to a savings account and kept essentially frozen, it would count as seed money and is limited to \$500 per source (e.g. the old campaign account counts as one source). So keep an eye on that and if you have any specific questions related to whether your plan is within the rules, feel free to ask me whether it is in compliance.

Small Donor Elections will look at the contributions you collected from December 23, 2022 through November 5, 2024. For Small Donor Elections compliance, regardless of what a contributor gave you before December 23, 2022, they may - starting on December 23, 2022 - contribute up to \$500 in seed money and also make an allowable or matchable contribution to the campaign (which right now is limited to \$250 per contributor).

2. Related, the \$5000 cap on seed money, would not be reduced by amounts raised between November 9<sup>th</sup> and December 23<sup>rd</sup>?

I can confirm that the \$5,000 seed money cap only counts what you raised from December 23, 2022 and later. However, again, if you have pre-existing funds in your campaign account on December 23, 2022, up to \$500 can be counted as seed money and spent on the 2024 campaign, and the rest has to go to a savings account that is essentially frozen.

3. Not sure there is anyway our insurance claims are going to be resolved by 23<sup>rd</sup>. So we are either going to have to overpay (the entire amount of broken glass before reimbursed by insurance) or wait until insurance claim is settled. Please advise as to the best way to handle. Overpaying is really not optimal, but if we overpay, we will receive insurance proceeds sometime in the future and will need to figure out if that needs to go into a savings account (if we overpay there may be other unpaid liabilities - such as attorney fees - so just need to make sure we have a mechanism to pay those with insurance proceeds).

If you get 2022 campaign bills on or after December 23, 2022, the options to pay them are pretty limited if you also want to participate in the program, such as the candidate personally settling the bill or the vendor waiting until after the November 5, 2024 election for payment. Or a combination of these two. The overpayment and refund plan is tricky when it comes to compliance with Small Donor Elections Code after December 23, 2022, for the 2024 election cycle. It would be in compliance if the refund were a de minimis transaction and would go into the campaign's savings account for prior campaign funds. When the term "de minimis" was selected, what was contemplated were things like interest payments from the bank or a small, automatic expense like an annual URL fee, or another small miscellaneous amount; they did not contemplate a refund from payment of a prior campaign's bill specifically, though any small amount would be de minimis.

So, here are ideas for handling these late invoices:

1. Candidate personally settles late invoices.
2. Vendor waits until after November 5, 2024 election to get payment of late invoices.
3. Campaign settles a conservative estimate of what is owed and any additional amount owed is settled in one of the two following ways:
  - a. By the candidate personally at any time, or
  - b. By the campaign after November 5, 2024 election.
2. Campaign overpays invoices and the refund is handled as follows:
  - a. If the refund is a small, de minimis amount, deposit it in the savings account for prior campaign funds.
  - b. If the refund is larger, wait until after the November 5, 2024 election to deposit it.

If you have another idea to settle late invoices, let me know and I will see if it is in compliance. City Council chose 45 days for this deadline because they thought that was enough time to get all invoices, so a way to pay them after 45 days was not contemplated in the Code.

The program's user experience process will be asking about the Return of Funds process, and it sounds like invoices that are coming 45 and more days late is causing difficulty for your campaign. That is worth mentioning in the user experience research process, as it could help the program formulate a new rule that would make this process easier on future campaigns that experience similar issues. It sounds like the 45 timeline is either too tight or some additional flexibility to settle late invoices would be helpful. These are the types of issues that user experience research is meant to surface so they can be remedied. The 16 participating candidates in 2020 did not experience this issue, but we are already seeing it in the second election cycle with your campaign, and that suggests it will be an issue in future election cycles and something that should be remedied. Curious what you think a better timeline is to receive and settle all invoices, or if you think there should just be a provision in Code that permits settling invoices from prior campaigns.

Let me know if you have more questions. I am mostly out of the office this week, so if you need an urgent answer and I didn't respond to your email, Shah has my phone number and your campaign can give me a call to trigger me to get you a speedy answer. I understand that December 23 is coming up quickly.

Cheers,

Susan

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**From:** Rene Gonzalez <[rene@artifexpartners.com](mailto:rene@artifexpartners.com)>

**Sent:** Monday, December 19, 2022 12:37 PM

**To:** Mottet, Susan <[Susan.Mottet@portlandoregon.gov](mailto:Susan.Mottet@portlandoregon.gov)>

**Cc:** Shah Smith <[shah@renewforportland.com](mailto:shah@renewforportland.com)>; Natalie Offenbecher <[natalie@summitfinancenw.com](mailto:natalie@summitfinancenw.com)>

**Subject:** Fw: Small Donor Questions

Hi Susan,

Still working through a couple of questions as got clarification on Honest Elections. Specifically, because my election was certified on December 14, they view that as the start date of a new election cycle under their rules (which is a different start date than small donor), meaning we can collect \$500 per donor under their rules, irrespective what people contributed in past. 2 questions once small donor kicks in (based on your last answers, believe 1 and 2 are pretty straight-forward, but want to be sure on it):

1. Donations between November 9<sup>th</sup> and December 23<sup>rd</sup>. Wanted to confirm that under small donor program that donations during this period would not preclude or limit what donors could give in seed money or matching contributions. For example, if some gave \$250 (or \$500) today, could they still give seed money, permissible contributions or matching contributions next year or in 2024?
2. Related, the \$5000 cap on seed money, would not be reduced by amounts raised between November 9<sup>th</sup> and December 23<sup>rd</sup>?

For 1 and 2, really the reason we are raising money right now is to take care of unexpected liabilities (attorney fees, vandalism, etc) from last election, but before we go all in just want to make sure it is not tying our hands too badly for a future reelection.

One last question:

3.

Not sure there is anyway our insurance claims are going to be resolved by 23rd. So we are either going to have to overpay (the entire amount of broken glass before reimbursed by insurance) or wait until insurance claim is settled. Please advise as to the best way to handle. Overpaying is really not optimal, but if we overpay, we will receive insurance proceeds sometime in the future and will need to figure out if that needs to go into a savings account (if we overpay there may be other unpaid liabilities - such as attorney fees - so just need to make sure we have a mechanism to pay those with insurance proceeds).

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**From:** Shah Smith <[Shah@renewforportland.com](mailto:Shah@renewforportland.com)>  
**Sent:** Wednesday, December 14, 2022 4:24 PM  
**To:** Rene Gonzalez <[rene@artifexpartners.com](mailto:rene@artifexpartners.com)>  
**Subject:** Fwd: Small Donor Questions

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**From:** Mottet, Susan <[Susan.Mottet@portlandoregon.gov](mailto:Susan.Mottet@portlandoregon.gov)>  
**Sent:** Wednesday, December 14, 2022 3:50:01 PM  
**To:** Shah Smith <[Shah@renewforportland.com](mailto:Shah@renewforportland.com)>  
**Subject:** RE: Small Donor Questions

By the way, the Auditor's 2024 limits, updated for inflation, are published for comment right now here: <https://www.portland.gov/auditor/documents/proposed-revision-appendix-1/download>. This the chart in the publication:

### Inflation Update Chart

	Original Rate	Inflation Rate Change	Rate Adjusted January 1, 2021	Inflation Rate Change	Rate Adjusted January 1, 2023
<b>Individual Contribution Limit</b> Code 2.10.010 B.1	\$500	+1.6%	\$508	+13.96%	<b>\$579</b>
<b>Political Committee Contribution Limit</b> Code 2.10.010 B.	\$500		\$508		<b>\$579</b>
<b>Dominant Contributor</b> Code 2.10.080 F.	\$1,000		\$1,016		<b>\$1,158</b>
<b>Dominant Independent Spender</b> Code 2.10.080 G.	\$1,000		\$1,016		<b>\$1,158</b>
<b>Communication Cost</b> Code 2.10.030	Charter and Code Silent		\$1,016		<b>\$1,158</b>
<b>Independent Expenditure</b> Code 2.10.020 B.	\$750		\$762		<b>\$868</b>

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**From:** Shah Smith <[Shah@renewforportland.com](mailto:Shah@renewforportland.com)>  
**Sent:** Wednesday, December 14, 2022 12:51 PM  
**To:** Mottet, Susan <[Susan.Mottet@portlandoregon.gov](mailto:Susan.Mottet@portlandoregon.gov)>  
**Subject:** Re: Small Donor Questions

Thanks Susan.

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**From:** Mottet, Susan <[Susan.Mottet@portlandoregon.gov](mailto:Susan.Mottet@portlandoregon.gov)>  
**Sent:** Wednesday, December 14, 2022 11:32:58 AM  
**To:** Shah Smith <[Shah@renewforportland.com](mailto:Shah@renewforportland.com)>  
**Subject:** RE: Small Donor Questions

Hi, Shah.

Here are the answers.

#1 clarification:

- From now through December 22, the campaign is under the Honest Elections contribution limits, which is enforced by the Auditor's office. I don't speak for how to comply with their rules in detail. Ask them what you can and cannot raise from now through December 22.
- From December 23, 2022 to November 5, 2024, if you all plan to participate in the Small Donor Elections program, its contribution limits and spending restrictions apply, so the campaign would need to follow those. That includes a restriction around paying expenses from prior campaigns (see Portland City Code 2.16.080A). When candidates ask us how to settle an invoice from a prior campaign once they are in the new election cycle, options include the candidate personally paying the invoice and telling the vendor that you will pay the invoice as soon as the election is over (November 6, 2024 in this case) if they can wait until then. It is also possible for a candidate to pay an invoice personally, wait until the election cycle is over, and then reimburse themselves for that payment without violating Small Donor Elections laws, but do make sure that doesn't violate Honest Elections or state campaign finance laws, which we don't enforce and therefore don't offer compliance advice on in detail.
- Before December 23, you may raise funds within Honest Elections rules and pay those expenses with raised funds under those rules, and again, the Auditor's office can answer compliance questions related to that.
- December 23 is 45 days after the November 8 election. City Council gave campaigns 45 days to receive and settle all campaign invoices. So if the law firm or whoever is handling the remedy for the vandalism have not sent final invoices yet, I would urge them to do so quickly.
- If your campaign has nothing left in it on December 23, please fill out the Return of Funds form and indicate that there is a zero balance and therefore nothing is due.

#2 A: If someone gives \$500 in seed money for 2024, this would be permitted under small donor program and would not require ad disclosure under honest elections?

- That is correct. The 2022 threshold is \$1,016, so if a contributor gave \$500 in seed money and then gave \$250 in the primary and \$250 in the general, they would have given \$1,000 total and be under the \$1,106 disclosure threshold. So that would not have to be disclosed. The 2024 disclosure threshold will be announced by the Auditor's office, adjusted for inflation since the 2022 threshold was announced.

#2 B: If someone contributes \$3000 in-kind for 2024, this would be permitted under small donor program and WOULD require ad disclosure under honest elections?

- That is also correct. A \$3,000 in-kind would be over whatever the 2024 disclosure threshold will be. It will be adjusted from the 2022 \$1,016 figure, to account for inflation over the last two years.

Did that cover everything? Always happy to give specific answers if you want to run specific scenarios by us.

Cheers,

Susan

Susan Mottet (she/they)  
Director  
503.823.4345

Small Donor Elections | City of Portland  
1221 SW 4th Avenue, Room 220 | Portland, OR 97204

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**From:** Shah Smith <[Shah@rexfordportland.com](mailto:Shah@rexfordportland.com)>  
**Sent:** Tuesday, December 13, 2022 6:56 PM  
**To:** Mottet, Susan <[Susan.Mottet@portlandoregon.gov](mailto:Susan.Mottet@portlandoregon.gov)>  
**Subject:** FW: Small Donor Questions

Clarifications:

1.

With respect to #1. We are unable at this point to determine final liabilities for 2022 election cycle - we are awaiting final legal fees for lease dispute and resolution of insurance for vandalism at office (which could take weeks longer). We anticipate these total liabilities may exceed how much we currently have in the bank, but we are unsure by how much yet. How long can we continue to fundraise against the 2022 campaign?

2. For 2024 election cycle, assuming we are in small donor program, want to clarify this language from honest elections: *Candidates participating in Open and Accountable Elections must follow the disclosure requirements. They must list on their advertisements the top 5 donors who have given \$1016 or more to their campaign. For OAE candidates, this would include their seed funders and their in-kind donors--if those individuals or entities have given over \$1016.*

If someone gives \$500 in seed money for 2024, this would be permitted under small donor program and would not require ad disclosure under honest elections?

If someone contributes \$3000 in-kind for 2024, this would be permitted under small donor program and WOULD require ad disclosure under honest elections?

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**From:** Mottet, Susan <[Susan.Mottet@portlandoregon.gov](mailto:Susan.Mottet@portlandoregon.gov)>  
**Sent:** Thursday, December 8, 2022 11:15:29 AM  
**To:** Shah Smith <[Shah@renewforportland.com](mailto:Shah@renewforportland.com)>  
**Subject:** RE: Small Donor Questions

Hi, Shah.

Sorry I missed your calls yesterday. I was out of the office for a day. Here are answers to your questions:

1. **New Cycle.** When does the new cycle begin? - believe it is date election is certified (which should be any day now). Meaning if someone gave max in runoff, what is date they can once again donate.

The 2024 election cycle begins on December 23, 2022 for the Small Donor Elections program. That is the date on and after which, if a candidate wishes to participate in the program for the 2024 election, the candidate should be following Small Donor Elections rules.

As for when a donor who gave the max in the 2022 runoff can donate again, that was reset immediately after the November 8 election. After November 8, campaign contributions are governed by the campaign finance regulations that the Auditor's office enforces. If you have questions about that, you should contact them. However, if the campaign plans to use Small Donor Elections, those rules apply starting December 23.

If the candidate wants the new contributions to count toward the Small Donor Elections program (e.g. get matched and count toward certification), the candidate must wait until December 23 and then file the Notice of Intent and the candidate and treasurer must take the mandatory program training. Once that is done, then those contributions count toward certification and are matchable. We are available to start doing trainings for the 2024 cycle on December 23. Let us know if you would like to schedule a training.

There is another way the campaign can accept contributions from donors under Small Donor Elections rules. Campaigns may accept up to \$5,000 total as seed money, though it is limited to \$500 per donor. The campaign can do that at any moment after the 2022 election to the day the campaign applies for certification for the 2024 election. I should note that that \$500 limit also applies to 2022 campaign funds applied to the 2024 election cycle, so if the campaign account has funds left over, it can keep up to \$500 in the campaign account for 2024 and that counts as a seed money contribution. If the campaign has more than \$500 or doesn't want to use the money in the account as seed money, the campaign needs to open a savings account associated with the campaign checking account and put the old campaign funds in the savings account and not touch it during the 2024 cycle.

2. If we run **an event** in January trying to understand how it plays out as small donor rules. Specifically, if cost of event is \$25 (tickets for attendance and food) and a shirt cost \$20:

- a. If an attendee pays \$25 for the tickets, confirm that this is not a contribution. The program code relies on state law definition of donation ("Contribution" has the meaning set forth in ORS 260.005 and 260.007), but want to make sure that is the correct definition.
- b. If an attendee pays \$20 for a shirt, confirm that this is not a contribution.
- c. If attendee pays a total of \$295 for ticket, shirt, and donation confirm this is treated as: \$45 for goods sold and \$250 as donation.
- d. if a corporation wants to buy tickets for event but does not want to contribute, can they buy for example 5 tickets for \$25 each.

The Small Donor Elections rules only apply if the candidate plans to use the program in 2024. If not, the rules the Auditor's office enforces apply and you should consult with them.

- a. If an attendee pays \$25 for the tickets, confirm that this is not a contribution. The program code relies on state law definition of donation ("Contribution" has the meaning set forth in ORS 260.005 and 260.007), but want to make sure that is the correct definition.

If the event ticket's fair market value is \$25, then the campaign would report selling that ticket for \$25 as selling an item at fair market value and that \$25 would not count toward the donor's contribution limit of \$250. If the campaign were to sell tickets for \$1,000 as a fundraiser, then the campaign would report the \$25 as selling an item at fair market value and \$975 as a contribution (which would go above the program's contribution limits).

- a. If an attendee pays \$20 for a shirt, confirm that this is not a contribution.

If the t-shirt's fair market value is \$20, then the campaign would report selling that t-shirt for \$20 as selling an item at fair market value and it would not count toward the donor's contribution limit of \$250. If the campaign were to sell the \$20 t-shirt for \$100 as fundraising, you would report \$20 as selling an item at fair market value and \$80 as a contribution. Only \$80 would count toward the donor's contribution limit and if it was from an eligible Portlander, the first \$20 of the \$80 would be matchable and count toward certification (provided the campaign had filed their Notice of Intent and completed required trainings).

- a. If attendee pays a total of \$295 for ticket, shirt, and donation confirm this is treated as: \$45 for goods sold and \$250 as donation.

If the fair market value of the ticket is \$25 and the fair market value of the t-shirt is \$20, then if an attendee pays \$295 for a ticket, t-shirt, and contribution, the campaign would report to the program:

- \$25 item sold at fair market value
- \$20 item sold at fair market value
- \$250 contribution

If the contribution was from an eligible Portlander, the first \$20 of the \$250 would be matchable and count toward certification (provided the campaign had filed their Notice of Intent and completed required trainings).

- a. if a corporation wants to buy tickets for event but does not want to contribute, can they buy for example 5 tickets for \$25 each.

A corporation may purchase tickets at fair market value. Or it may purchase tickets at fair market value and make a contribution, so long as that contribution fits into the requirements of seed money contributions. Campaigns may accept seed money contributions from any legal source (i.e. accepting a contribution from a foreign government would be illegal, but accepting a contribution from a business is legal under state and federal law so that is permissible in the program as a seed money contribution). The campaign may accept up to \$500 per donor in seed money, provided the campaign does not go over the \$5,000 seed money limit. And the campaign can do this starting right after the November 8 election all the way until applying for certification in the program. So, for an event in January 2023, a corporation could give the campaign \$625 and receive five tickets and it would be reported as follows:

- \$125 selling items at fair market value
- \$500 seed money contribution.

That is the simple answer. We could get into really squirrely edge cases here. What if a campaign announces an event for 500 people that will cost the campaign \$10,000 to host so tickets are \$20 and a corporation buys all 500 tickets and then tells the campaign that no one can attend and the campaign cancels the event but keeps the \$10,000, and that was the plan all along? Then if you look at the state definition of contribution that the Small Donor Elections program uses, it would start looking more like a contribution and one that is prohibited by Small Donor Elections rules. But, if we are dealing with a more typical situation where JoJo's Fruit Market buys two \$25 tickets to an event and the fair market value is \$25 per ticket and Mr. & Ms. JoJo attend, we are in safe territory here. Can JoJo's Fruit Market raffle off the two tickets plus a \$500 gift certificate to anyone who donates at least \$20 to the campaign? That gets squirrely again and the analysis changes. So, let me know if you have an atypical case and I will get you an answer for that. But if we are in typical territory, the answer above applies.

I wanted to remind you that campaigns must repay any unspent matching funds from the 2022 cycle by the December 23 deadline. To determine what amount that is, if any, we have a form:

<https://www.portland.gov/smalldonorelections/documents/2022-return-public-contributions>. Please send us the completed form, even if no payment is due.

Also, if y'all are planning an event in January, and given that all seats are up for election in 2024, that makes me wonder, are you going to be the campaign manager straight through 2024? I am just wondering if you will remain my main point of contact for the campaign continuously. Y'all may not have totally nailed that down yet, but if you have, feel free to share that with me.

Have a nice holiday. Let me know if you all want to schedule a training. And let me know if you have more questions.

Cheers,

Susan

Susan Mottet (she/they)



Director  
503.823.4345

Small Donor Elections | City of Portland  
1221 SW 4th Avenue, Room 220 | Portland, OR 97204

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**From:** Shah Smith <[Shah@renewforportland.com](mailto:Shah@renewforportland.com)>  
**Sent:** Wednesday, December 7, 2022 11:24 AM  
**To:** Mottet, Susan <[Susan.Mottet@portlandoregon.gov](mailto:Susan.Mottet@portlandoregon.gov)>  
**Subject:** FW: Small Donor Questions

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Hi Susan,

I wanted to ask the following questions heading into next year:

1. **New Cycle.** When does the new cycle begin? - believe it is date election is certified (which should be any day now). Meaning if someone gave max in runoff, what is date they can once again donate.
2. If we run **an event** in January trying to understand how it plays out as small donor rules. Specifically, if cost of event is \$25 (tickets for attendance and food) and a shirt cost \$20:
  - a. If an attendee pays \$25 for the tickets, confirm that this is not a contribution. The program code relies on state law definition of donation ("Contribution" has the meaning set forth in ORS 260.005 and 260.007), but want to make sure that is the correct definition.
  - b. If an attendee pays \$20 for a shirt, confirm that this is not a contribution.
  - c. If attendee pays a total of \$295 for ticket, shirt, and donation confirm this is treated as: \$45 for goods sold and \$250 as donation.
  - d. if a corporation wants to buy tickets for event but does not want to contribute, can they buy for example 5 tickets for \$25 each.