



P O R T L A N D
CITY AUDITOR
Elections

November 23, 2022

Rene Gonzalez
PO Box 82356
Portland, OR 97282

Rene for Portland
1010 SW 11th Avenue
Portland, OR 97202

DELIVERED ELECTRONICALLY
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Notice of Amended Determination on Reconsideration No Violations

Campaign Regulation Complaint No.: 2022-03-RG

Dear Rene Gonzalez and Rene for Portland:

The Auditor's Office received an initial campaign finance violation inquiry on August 2, 2022, which alleged that candidate committee Rene for Portland received contributions that exceeded City contribution limits as regulated by [Portland City Charter Section 3-301](#) and corresponding [Portland City Code Section 2.10.010](#). The Auditor's Office issued its findings on October 20, 2022 and determined that six violations of campaign finance regulations occurred.

The Auditor's Office withdrew its determination on October 31, 2022 to reconsider the evidence after reviewing a legal decision related to the facts at issue here. On reconsideration, the Auditor's Office has determined that no violations of campaign finance regulations occurred.

Investigation and Outcome

The Auditor's Office reviewed the Administrative Hearing Final Order issued on October 27, 2022 from the appeal of the Small Donor Elections Program's determination. Administrative Law Judge Joe Allen concluded that the Small Donor Elections Program failed to prove Rene for Portland paid less than fair market value for downtown office space, which included parking that could not be justifiably separated from the value of the office space. The Final Order concluded that the Small Donor Elections Program did not prove Rene for Portland received prohibited contributions from Schnitzer Property Management, LLC.

Based on the Administrative Law Judge's findings, the Auditor's Office concludes that the evidence presently available is insufficient to determine whether in-kind parking contributions were received by the campaign and that the parking is, at least as of the date of the issuance of this decision, an amount that is allowed by the Small Donor Elections Program. The Auditor's Office, therefore, finds the current



record of evidence does not substantiate that Rene for Portland violated City Charter Section 3-301 and corresponding City Code Section 2.10.010.

Prior documents related to Complaint No. 2022-03-RG are located here:

- [Filed complaint](#)
- [Small Donor Elections Program Original Determination](#) (issued September 20, 2022)
- [Original Auditor's Office determination](#) (issued October 20, 2022)
- [Administrative Hearing Final Order](#) (issued October 27, 2022)
- [Auditor's Office related determination for Complaint No. 2022-05-RG](#) (issued October 31, 2022)
- [Auditor's Office related determination for Complaint No. 2022-04-SPM](#) (issued October 31, 2022)
- [Auditor's Office related determination for Complaint No. 2022-06-RG](#) (issued November 8, 2022)

Additional Authority and Appeals

This Notice of Amended Determination on Reconsideration is issued pursuant to the Auditor's authority under City Code Section 2.10.050. That section sets forth the process for implementation and enforcement of the provisions of City Code Chapter 2.10, including the recipient's appeal rights.

The recipient may request a reconsideration of this decision at any time before the decision becomes final, as provided in the Auditor's Administrative Rule [ARA 13.03\(D\)\(5\)](#).

This Notice of Amended Determination on Reconsideration becomes final within 30 calendar days from its issuance unless an appeal of this determination is filed. An appeal may be filed with the Multnomah County Circuit Court within 30 days of the issuance of a decision, as described in [City Code Section 2.10.050 I](#) and Auditor's Administrative Rule [ARA 13.02\(D\)\(6\)](#).

Sincerely,

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

Louise Hansen
City Elections Officer