SMALL DONOR ELECTIONS PORTLAND

# Small Donor Elections Candidate Guide

## 2026 Regular Election

**November 3, 2025**

This guide is intended to explain the Small Donor Elections program in a format and manner that is helpful and easy to understand for candidates as well as campaign vendors, staff, and volunteers. It does not go into the level of detail and specificity as the Small Donor Elections Code, Administrative Rules, and Guidance. Candidates and campaigns are responsible for complying with the Small Donor Elections Code, Administrative Rules, and Guidance, which can be found on the program website: www.portland.gov/smalldonorelections.

This guide starts with 6 parts, phases of a campaign, from considering running to after the election.

1. Considering running
2. Getting started
3. Campaigning while working toward certification
4. Campaigning as a certified candidate
5. Campaigning near the election
6. After the Election

The final sections include the most important section, which explains how to comply with the Small Donor Elections law and rules.

If you have any questions about the Small Donor Elections program, please contact program staff:

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# Small Donor Elections Program Overview

Candidates running for Mayor, Auditor, or City Councilor in Portland are eligible to participate in the Small Donor Elections program. The Small Donor Elections program aims to prevent corruption, and the appearance of corruption, caused by the real or imagined coercive influence of large financial contributions on candidates' positions and on their actions if elected to office. It provides candidates who have broad community support and follow program rules with up to a 10-to-1 match on the first $25 they receive from Portland residents. To be eligible for the match, candidates must prove they have broad community support by collecting hundreds of small contributions from Portlanders, following the program rules limiting the size of contributions they receive, and ensuring that funds are spent on legitimate campaign expenses. The nine-member Portland Elections Commission holds public meetings to take community input and advises program staff and the Council about the program.

# Phase 1: Considering Running

In deciding whether to run, please consider doing the following at this point.

## Note the 2026 election cycle timeline & deadlines

| | | |
|---|---|---|
| January 1, 2025 | 2026 election cycle begins | Candidates who plan to participate begin following program rules |
| July 1, 2025 | First day to file Notice of Intent | Candidates may file notice of intent to participate |
| January 2, 2026 | First day candidates can apply for certification | Candidates may apply for program certification |
| June 3, 2026 | Ballot filing period begins | Candidates may file to run for office |
| July 1, 2026 | Mandatory training deadline | Deadline for candidates and treasurers to take mandatory training |
| July 20, 2026 | Notice of Intent deadline | Last day to file a Notice of Intent to participate in the program |
| July 28, 2026 | Certification application deadline | Last day to apply for certification in the program |
| August 25, 2026 | Ballot filing period ends | Last day for candidates to file to run for office |
| October 13, 2026 | Deadline for qualify for higher matching tiers | Last day to collect matchable contributions that count toward next tier |
| October 22, 2026 | Matching ends | Last day to collect matchable contributions |
| 12pm, October 23, 2026 | Optional: report last matchable contributions | Deadline to report matchable contributions for payment before election |
| November 3, 2026 | Election day | The 2026 city election |
| December 31, 2026 | Deadline to return unspent public funds | All unspent matching funds must be returned by this date |

## Take the Small Donor Elections mandatory training

If you decide to run, you must start your campaign in compliance with the Small Donor Elections law and rules, if you wish to participate in the program. (There is a provision that permits you to cure non-compliance within 30 days of filing with the program.) This training covers how the program works and how to comply with it. Many people say that the training helped them decide whether to run. You may invite others to the training

- Must be completed by the candidate and treasurer before raising contributions that will be submitted for City matching funds

- Can be taken before filing
- Can be taken confidentially
- Deadline: July 1, 2026

Trainings can be scheduled individually with campaigns, or you can take the regularly scheduled group trainings. The schedule is available on the program's website under events.

One-on-one trainings can be done confidentially for candidates who are not ready to announce yet. The training can be given either remotely over Zoom or in-person at the Portland Building. Please contact Danita Harris at 503.823.5292 or Danita.Harris@portlandoregon.gov to schedule a one-on-one training.

## Learn state and city campaign rules

- State regulations: Oregon Secretary of State Campaign Finance Manual
- City Charter contribution limits and disclaimer requirements: Campaign Finance in City Candidate Elections, and
- City Small Donor Elections matching funds program (optional): Small Donor Elections Program

## Talk to potential treasurers

Treasurers typically help campaigns get set up to run and provide invaluable compliance advice. You can always be your own treasurer – temporarily or permanently – or use a volunteer treasurer. Here is a list of professional treasurers who agreed to share their information in this guide.[1]

- Mónica Santoyo at Donna Forte, https://www.donnaforte.org/, monica@donnaforte.org, (503) 544-4528
  - Services: Campaign finance guidance, ORESTAR and City of Portland Small Donor Elections set-up and reporting, data validation, compliance and disclosure consulting, employee vs contractor determination, bookkeeping, budget planning process, budget vs actuals reporting, Fair Market Value (FMV) assessments for in-kind contributions/expenditures, etc.
  - Mónica offers a free consultation to understand your needs and provide a custom quote.
- Jef Green at C & E Systems, https://www.c-esystems.com/contact, info@c-esystems.com, (503) 295-1851
  - Services: Banking, merchant services/donation pages, fundraising software, donor thank you letters, treasurer, bookkeeping and compliance responsibilities.
  - Email for a fee schedule and overview of services
- Elizabeth Wilson at Imperium Political Strategies, https://imperiumpoliticalstrategies.com/, elizabeth@imperiumpoliticalstrategies.com, (503) 267-3947
  - Services: political consulting, fundraising, treasurer services
  - Email for a fee schedule for treasurer services
- Jessica A. Miller, https://financialpeacebookkeeping.com/, help@financialpeacebookkeeping.com, 971-612-2291
  - For information regarding Financial Peace Book Keeping's full range of services please call or email.

[1] If you are a treasurer and wish for your information to be shared in this guide, please contact program staff.

## Compliance tips for this phase

If you have a question, please call or email program staff using the contact information on page 1.

**Can I accept shared polling data?**
If anyone shares non-public polling data with you, often in an attempt to convince you to run, unless you compensate them for the fair market value of what was shared, this is an in-kind contribution under state and city law. It must comply with relevant contribution limits.

# Phase 2: Getting Started

## Steps for launching the campaign

There are a number of steps to launch a campaign and to get signed up to participate in the Small Donor Elections program.

- File candidate committee with the Secretary of State's office
- Open a bank account for the campaign or, if using a bank account from a prior campaign, ensure it is in compliance with Small Donor Elections requirements:
    - If the prior campaign's bank account has no more than the $875 seed money contribution limit in it, there are no steps required to get it into compliance with Small Donor Elections.
    - If the prior campaign's bank account has more than the $875 seed money contribution limit in it, open a savings account associated with the campaign checking account and transfer the excess money in the checking account into the savings account.
- The candidate and treasurer have both taken the Small Donor Elections mandatory training (see page 3 for details).
- File a Notice of Intent to participate in the Small Donor Elections program (see page 6 for details)
- During the filing period (June 3 to August 25, 2026), file to appear on the ballot with the Auditor's office.

## Fundraising & campaign spending

Although contributions that count toward certification must be at least $5, contributions between $0.01 and $20 will be matched 10-to-1.

See the Small Donor Elections code, administrative rules, and the Small Donor Elections Law and Administrative Rules section of this guide for contribution limits, spending rules, and other relevant program rules.

## Requirements for matchable contributions

For a contribution to be matched from the Small Donor Elections Fund, it must:

- Be from a Portland resident who is 18 years of age or older,
- If the payment is cash or money order, be accompanied by a completed cash donor attestation form.

- Not in exchange for an item of value (e.g. campaign merch or explicitly exchanged for a contribution from another candidate)
- Be validated by the City of Portland that the donor is matchable.

## City matching funds caps

City matching funds are capped. Once a candidate reaches their cap, they may continue to raise funds but will not receive additional matching funds.

| Office | Mayor | Auditor | Council |
|---|---|---|---|
| Match Cap | $750,000 | $50,000 | Tier 1 (at least 250 Portland contributors): $100,000<br>Tier 2 (at least 750 Portland contributors: $200,000<br>Tier 3 (at least 1,250 Portland contributors: $300,000 |

## Documentation for matchable cash and money order contributions

When submitted cash or money order contributions for matching funds, you must also submit a cash attestation form.

Attestation document includes either the Attestation form published on the program website or a remit slip with the required attestation information, an example of which is published on the program website.

When an attestation form with a handwritten signature is required, the handwritten signature requirement is waived if the donor has a disability that prevents them from providing a handwritten signature.

## Prepare for media attention

There are three actions that tip off reporters that you are running:

1. Filing your Notice of Intent to participate in the program (we list who filed on our website with campaign contact information),
2. Filing a political committee with the Secretary of State's office (reporters scan filings to see who is planning to run), and
3. Filing to appear on the ballot (application is published online).

Prior to taking these actions, it is a good idea to get at least an initial campaign website published, with contact information and a method to accept contributions.

## File a Notice of Intent

There are several important things to remember about filing a Notice of Intent:

1) The first day it can be filed is July 1, 2025 and the deadline to file is July 20, 2026.
2) Once filed, the candidate's name and contact information will appear on the program's website, which can lead to media attention.
3) Once filed, the city will invite the campaign to register with its Ariba system, so the campaign will be set up to receive matching funds payments. Please see the Ariba registration guide on the program website once it is developed.
4) Campaigns may accept matchable contributions the same day the Notice of Intent is filed.

## Prepare to handle reporting requirements

Candidates must follow all state reporting requirements to the Secretary of State's office. In addition, within 30 days of a candidate filing a Notice of Intent, they must begin reporting their contributions and expenditures to the Small Donor Elections program on the following timeline:

- First report: all transactions from the beginning of the election cycle
- Subsequent reports: the state reporting schedule of 30-day reporting until 42 days before the election at which point 7-day reporting applies.
- Candidates may stop submitting reports only once the candidate has returned all unspent public funds to the program.

Candidates may do this using the OpenElectionsPortland.org software found at openelectionsportland.org and linked on the program website. Upon filing a Notice of Intent, the program creates a user account to the OpenElectionsPortland.org software for the treasurer. The treasurer can create user accounts for the candidates or campaign team members.

Even some non-participating candidates must follow the reporting requirements of the Small Donor Elections law at the end of the election cycle.

A campaign may report contributions late without penalty if there is a personal emergency or mitigating circumstance as described in Administrative Rule 16.

## Compliance tips for this phase

If you have a compliance question, please call or email program staff using the contact information on page 1.

**Does money from prior campaign count toward the $5,000 total seed money limit?**
Yes.

**What kind of contributions can I raise at this point?**
Before filing a Notice of Intent and taking the mandatory training, campaigns may raise any type of contribution – with limits – but contributions from matchable contributors are not eligible to be matched. If raising money from matchable contributors at this point, consider raising $25 less than the limit, so $25 can be raised and matched later. After filing a Notice of Intent and taking the mandatory training, contributions are matchable. Establish a campaign account with a bank or credit union no later than three business days after first receiving a contribution or making an expenditure, or not later than the deadline for filing for office, whichever is first. See details in the Oregon Campaign Finance Manual.

**Can I sell campaign merch in exchange for a matchable contribution?**
Yes and no. If a campaign t-shirt has a fair market value of $10, and you sell it for $10, that is an item sold at fair market value, not a contribution. However, if you sell it for $30, $10 is an item sold at fair market value and $20 is a contribution, which is matchable if it is from a Portlander.

# Phase 3: Campaigning while working toward certification

## Certification requirements

To get certified, candidates must:

- Have complied with program rules (or if there are minor violations, have cured them or paid the penalty),
- Raised at least $5 from the follow number of unique Portland residents:
    - For Mayoral candidates: 750
    - For Council and Auditor candidates: 250 from anywhere in the city, regardless of district
- Have filed all required reports of contributions and expenditures and any documentation required or requested by the Director.

Raising money: Candidates must raise the required number of contributions from individuals living in the City of Portland. They can raise funds from donors living outside of Portland, but only donations from Portland residents count towards the qualifying requirement.

The program strongly recommends raising 10-20% more than the required number of contributions, because typically at least 10% of the contributions that appear to count will not count, either because they are repeat contributors who count only once or because some addresses that appear to be in Portland are outside of city limits. Whether an address is inside city limits can be looked up on PortlandMaps.com. Candidates who are close to reaching the certification threshold may ask program staff to provide them with an informal count.

## Getting assessed for readiness to apply for certification

Candidates may only file for certification *two times* - unless their first application was rejected due to fraud, in which case the campaign is not permitted to reapply. Our office strongly encourages candidates to ask for an informal assessment before applying for certification, so that our staff can update the campaign on how many matchable contributions we have verified or any other issues that need to be corrected before being able to successfully apply for certification. Program staff want to help campaigns successfully use the program, which includes helping them succeed in getting certified.

## Getting certified

Once candidates have collected the required number of matchable contributions, they can then apply for certification using the form on the website:

- Candidates may apply for certification starting in January 2026.
- The deadline to get certified is July 28, 2026.
- A candidate may only apply for certification twice in an election cycle – except campaigns that are denied for fraud may not apply again.
- Please reach out to program staff for an assessment of campaign readiness to apply for certification before submitting certification application.

Once certified, the program will provide notice to other candidates in the same race of the certification and a 7-day appeal period begins.

Upon certification, the program issues the first matching payment to the campaign via an electronic funds transfer. This payment includes matching funds for contributions collected from after filing a Notice of Intent up through certification. Although contributions that count toward certification must be at least $5, contributions between $0.01 and $20 will be matched up to 10-to-1 by the program.

## Campaigns that don't get certified

Campaigns that do not get certified are no longer participating in the Small Donor Elections program and must follow the contribution limits in the City Charter (see Honest Elections and Small Donor Elections section on page 17 for details).

## Compliance Tips for this phase

**What kind of contributions can I raise at this point?**
Campaigns may raise any type of contribution – with program limits. However, once campaigns apply for certification, they may not raise any more seed money contributions.

**What should a campaign pay canvassers?**
For compliance, (1) pay fair market value and (2) do not compensate based on the amount collected, if their compensation is more than the amount they collect, as doing so creates an incentive for fraud. For example, if a campaign pays a canvasser $2 for every $1 they collect, it gives a canvasser an incentive to supplement a donor's $5 contribution with their own $20, so they get paid $40 instead of just $10 (because $40 of pay minus $20 oof their own cash is $20, which is higher than $10 of pay alone). For guidance, fair market value for canvassing is typically as low as $21 per hour and as high as $35 per hour, depending on various factors. It is not unheard of to pay $40 per hour in highly unusual circumstances.

**What do I need to know about campaign lawn signs?**
It is important to know two things about lawn signs. First, there are city rules for where they can be placed. Second, that conventional campaign wisdom is that 70% of campaign funds should be directed toward communicating with voters, and lawn signs do not count as communications. They are a campaign visibility tool, and as such, it is recommended to spend 5% or less of campaign funds on lawn signs.

# Phase 4: Campaigning as a certified candidate

## Receiving matching funds

The program will distribute matching funds at least once every month, but typically every two weeks, provided that the campaign is owed at least $1,500 in their next matching payment. The distribution method will be electronic deposit into the campaign bank account.

Candidates who are not contested may participate in and get certified in the program, but matching funds will not be distributed until the race becomes contested. All matchable contributions will be matched, even the ones collected prior to the race becoming contested. If a candidate receiving matching funds becomes unopposed, no additional matching funds will be distributed if the race is uncontested.

## Match caps

- Mayoral candidates can earn up to $750,000* in matching funds,
- Auditor candidates can earn up to $50,000 in matching funds, and
- City Council candidates can earn up to $300,000* in matching funds, but divided into tiers (see below for details).

If the program is underfunded, match caps may be lowered the smallest amount to ensure the program does not run out of matching funds before election day. If this is done, campaigns will be notified, and the announcement will be posted on portland.gov/SmallDonorElections

## Tiers

The tier system offers Council candidates different levels of public funding based on the number of small donations the campaign receives from eligible Portland residents. As candidates meet specific thresholds of contributions they unlock higher levels of matching funds.

- A total of 250 qualifying donors can unlock the first round of matching funds of up to $100,000
- A total of 750 qualifying donors can unlock the second round of matching funds of up to an additional $100,000, or $200,000 total. Application for tier 2 and 3 can be found HERE
- A total of 1,250 qualifying donors can unlock the final round of matching funds, of up to a final $100,000, or $300,000 total. Application for tier 2 and 3 can be found HERE

## Reduction to match caps and/or the match rate

Matching rates are subject to change in the event of budget shortfalls. While the Portland Elections Commission will endeavor to avoid any lowering of the 10-to-1 match rate or the match caps, this will be done as little as possible if necessary to ensure the program does not run out of matching funds before election day. Notice of the lowering of the match rate or cap will be given to campaigns in advance of any changes to reduced payments from the program as well as posted on the program website.

Learn more about the tier fundings mechanisms and the reduced match cap on the program website.

## Compliance tips for this phase

If you have a question about whether Small Donor Elections law and rules allow something, please call or email program staff using the contact information on page 1.

**What kind of contributions can I raise at this point?**
Campaigns may raise any type of contribution – with program limits – except seed money.

# Phase 5: Campaigning as the election nears

As the election nears, there are a few key dates:

- Tuesday, October 13, 2026, is the last day for Council candidates to collect matchable contribution to qualify for tier 2 or 3.
- Friday, October 22, 2026, at 11:59pm is the last day to collect matchable contributions.
- Saturday, October 23, 2026, at noon is the reporting deadline for matchable contributions that campaigns wish to receive a matching payment for before the election. This deadline is optional. The standard reporting deadline of 7-day reporting is the mandatory deadline.

# Phase 6: After the Election

## Contribution limits that apply after the election

After election day, the Small Donor Elections contribution limits no longer apply. Instead, the contribution limits in the City Charter apply.

## Returning unspent public funds

After the election, campaigns have through December 31 to pay outstanding expenses and then must return any unspent public funds to the Office of Small Donor Elections. Unspent funds are calculated proportionally using the Return of Funds form. For example, if a campaign received 75% of its funding in City Matching Funds, it owes 75% of what is left in the campaign bank account to the Small Donor Elections program. Only obligations undertaken prior to the election may be deducted from what is owed to the Fund.

# Small Donor Elections Law and Administrative Rules

Candidates must comply with all applicable state, county, and city campaign finance laws. This section covers Small Donor Elections requirements.

## Contribution limits

Participating candidates must abide by program contribution limits for the entire election cycle (January 1, 2025 to December 31, 2026). If a candidate accepts more than is permitted, the campaign must either cure the violation or pay a penalty (see Administrative Rule 18).

| Individual | Small Donor Political Committees[1] | 501c4, 501c5, 501c6 organizations and political committees | Other legal sources[2] |
|---|---|---|---|
| **$875** seed money[3] | **$875** seed money[3] | **$875** seed money[3] | **$875** seed money[3] |
| + | + | | |
| **$350** monetary, in-kind, or a combination | **$350** monetary | + | |
| | + | | |
| | **$10,000** directly-provided[4] in-kinds | **$10,000** directly-provided[4] Democracy Building Activities[5] | |

[1] *A 501c4, 501c5, or 501c6 organization or political committee, 90% of the funding of which is from individuals who contribute $250 or less per year.*
[2] *Any source legal under federal and state law.*
[3] *Up to the total limit of $5,000 seed money per campaign.*
[4] *Exception: up to $5,000 of goods and services that increase accessibility or language inclusivity may be indirectly provided (e.g. pay a campaign bill).*
[5] *Democracy Building Activities are defined in Section 3(F) of the program's Administrative Rules.*

**In-Kind Contributions**

In-kind contributions are contributions in the form of property, goods, or services instead of money.

Individuals may give up to the individual limit of $350 in money or in-kind contributions, or a combination of the two.

Nonprofit organizations (501(c)(4), 501(c)(5), and 501(c)(6)) and political committees may make in-kind contributions in different manners, based on whether they are a Small Donor Political Committee or not.

Small Donor Political Committees are (501(c)(4), 501(c)(5), and 501(c)(6)) and political committees if 90% of their funds are from individuals who give $250 or less per calendar year. They may give up to $10,000 in directly provided in-kinds.

Organizations and political committees that are not Small Donor Political Committees may give up to $10,00 in directly provided in-kinds only in the form of Democracy Building Activities. Democracy Building Activities are defined in Administrative Rule 3 as:

1. Paid staff time and related goods or use of real or personal property for canvassing, phone banking, and text banking, provided that the majority of the canvassers and phone bankers and text bankers are volunteers;
2. Providing participating candidates with a list of individuals from the contributors contact list for campaigns to contact directly; and
3. Paid staff time providing the following services to participating candidates:
    a. Creating and sharing messages on issues that are part of the contributor organization's mission;
    b. Identifying voter models for campaign communications;
    c. Increasing voter engagement;
    d. Security planning; and
    e. Campaign planning.

***Permissible indirectly provided in-kind contributions: property, goods, and services that increase accessibility or language inclusivity***

The exception to the requirement to be directly provided is that up to $5,000 of property, goods, and services that increase accessibility or language inclusivity. Examples include translating campaign materials into other languages and hiring for an ASL interpreter at a campaign event. Translating campaign materials fit within this exception, but not the cost of printing and distributing these materials. For these types of in-kind contributions, the contributor does not have to provide it directly; they can simply pay a bill for someone else to provide these.

**Loans**

Campaigns may maintain a loan balance of up to $5,000 at any given moment.

**Volunteer Time**

The program allows unlimited volunteer time, regardless of the value of the volunteer's time. Note that the state considers some kinds of volunteered legal representation a contribution, even though the program does not, and it must be reported to the state as a contribution.

## Timing of Contributions

Campaigns may accept contributions during the entire election cycle, with two exceptions. Contributions collected before taking the mandatory training and filing a Notice of Intent are not matchable, and seed money may only be collected until the campaign is certificated.

| Type | Once election cycle begins | Once filed NOI & trained | Once certified |
|---|---|---|---|
| **Seed** | **Yes** | **Yes** | **No** |
| **In-kind** | **Yes** | **Yes** | **Yes** |
| **Allowable** | **Yes** | **Yes** | **Yes** |
| **Matchable** | **No** | **Yes** | **Yes** |

## Restrictions on campaign expenditures

There are restrictions on which campaign expenses can be paid for with which types of contributions. Since all campaign expenses come out of the campaign bank account, the program determines whether certain expenses were paid with allowable or prohibited funds is through proportional calculation. If a campaign spent $500 on travel to California, for which public funds may not be used, it is in compliance as long as the campaign raised at least $500 in other types of funds. The campaign should--and the program will--add up all expenses that cannot be paid with any type of funds to determine whether the campaign, as a whole, staying in compliance with the expenditure restrictions. This below chart shows which campaign expenditures can and cannot be made from different types of contributions.

| Type of Expenditure | Private funds | City Matching Funds |
|---|---|---|
| Anything prohibited by state law (e.g. personal expenses, cash) | **No** | **No** |
| Contributions (gifts) to non-profits | **No** | **No** |
| Self-dealing (defined in Administrative Rule 8(B) | **No** | **No** |
| Paying penalties | **Yes** | **Yes** |
| Repaying loans | **Yes** | **Yes** |
| Certain vehicle expenses (fuel, parking, rideshares, mileage reimbursement for campaign use) | **Yes** | **Yes** |
| Out of state travel (except to Clark and Skamania counties) | **Yes** | **No** |
| Salary or payment to a family member (other than reimbursements) | **Yes** | **No** |
| Gifts (not including items worth $1 or less like brochures, buttons, signs, etc.) | **Yes** | **No** |

## Violations

If a candidate violated program requirements, the Director may impose a penalty on the candidate or campaign. The purpose of penalizing violations is to deter the intentional or negligent violation of program requirements, ensure the proper stewardship of funds, and ensure public transparency. It is not intended to discourage candidates from participating for fear of excessive penalties for errors that do not harm the purpose of the program.

Sometimes the Director has discretion as to the severity of the penalty. If a violation occurs due to an error by the Director, the penalty will be waived. The Director may withhold city matching funds until penalties are paid, and other required remedies are carried out.

| VIOLATION | DESCRIPTION | PENALTY | CAP | SOURCE |
|---|---|---|---|---|
| Late Filings | Submitted a transaction late | 0.5% of the amount(s) per calendar day | - | Campaign account* |

| | | | | |
|---|---|---|---|---|
| Insufficient Filings | Missing required information or with inaccurate/inadequate information | 0.5% if the transaction amount(s) per calendar day if not remedied in time | 25% of the amount | Campaign account* |
| Fully Omitted Contributions and Expenditures | Not submitted on time or within the subsequent filing period | 1% of the transaction amount(s) per calendar day | 50% of the amount | Campaign account* |
| Prohibited Contributions | Impermissible contribution or contribution over limit | Two times the amount of the prohibited contribution. | - | Campaign account |
| Prohibited Contributions Before Notice of Intent | Provides documentation as to why it's not possible to return | Amount of the prohibited contribution | - | Campaign account |
| | Not remedied by the campaign | Ineligibility for certification | | |
| Prohibited Expenditures | Prior to filing Notice of Intent | Repayment + 10% penalty, denial of certification | - | Campaign account and candidate's personal funds |
| | After being certified | Repayment or decertification | | |
| In-Kind Over Limit | Violation totaling $1,000 or less | Equal to the violation amount | $10,000, or more if the violation amount was over $10,000 | Campaign account |
| | Violation totaling more than $1,000 | Equal to 2x the violation | | |
| Soliciting/Directing Contributions to Other Campaign Finance Entities | Soliciting or directing contribution to a political committee for the purpose of independent expenditures to support one's own election | At the discretion of the Director | $10,000 | Candidate's personal funds |
| Misrepresentation of Program Status | Misrepresentation that a candidate is participating in the program when they are not, committed by candidates, campaign staff, or campaign surrogates | $1,000 per incident | $5,000 | Candidate's personal funds |
| Falsifying Documents | Submitting documentation that has been falsified by candidate, campaign staff, or a third party that the campaign did or should have known about | Decertification, repayment of all Public Contributions with 12% interest per annum | - | Campaign account and candidate's personal funds |

| | | | | |
|---|---|---|---|---|
| Campaign Account Violation | Minor violations<br><br>Serious violation | Up to 1x the violation amount<br><br>Up to 3x the violation amount | - | Candidate's personal funds |
| Egregious Violations | Includes failure to timely & accurately report transactions that violate program requirements, failure to remedy a violation within a reasonable period, and failure to pay penalties totaling a large percentage of their privately raised funds within a reasonable time. | May increase penalties by 3x and/or decertification, which requires repayment of all public matching funds with interest. | $10,000, or more if the violation amount was over $10,000 | Director will specify |
| Other Violations | Campaign violates any other part of the law or rules not delineated here. | Up to $10,000 or decertification, repayment of all public funds with interest. | $10,000, or more if the violation amount was over $10,000 | Director will specify |
| Items of Value Reported as Contributions | Collecting money in exchange for an item of value and reporting it as matchable contribution | 3X the match rate of the item of value. | - | Campaign account |
| Fraud | Knowingly, recklessly, or negligently misrepresenting and/or withholding a material fact for the purpose of or resulting in deceiving the program. | Denial of certification and repayment of City funds plus 10% interest per annum if already certified | - | Campaign account and personal funds if funds in campaign account are insufficient |
| Records Inspections | Failing to comply with a records inspection request or provide answers to investigatory questions or requested documents. | Denial of certification or decertification | - | - |

Reporting related violations may be paid by the treasurer if paying such fines is part of the contract with the treasurer.

## Documentation, audits, and investigations

Any documents participating candidates are required to collect must be retained by the campaign for at least six months after the November 3, 2026 election, unless the original document was given to the program Director.

In addition to the required documentation listed above, participating candidates must provide any records or documentation the Director requests and cooperate with any investigatory measures deemed relevant. The program may conduct unannounced site visits to campaigns to inspect documents.

# Honest Elections and Small Donor Elections

In November 2018, Portland voters passed the Honest Elections policy into the city Charter. The ballot measure amended the Charter to create contribution limits and disclaimer requirements. This is a different policy than the Small Donor Elections program.

If a candidate is running under Small Donor Elections, some of the Honest Elections rules apply to them and some do not:

- Candidates participating in Small Donor Elections are *exempt from* the contribution limits created by Honest Elections, provided that they comply with Small Donor Elections limits.
- Candidates participating in Small Donor Elections *must follow the* disclaimer requirements. They must list on their campaign communications the top 5 donors who have given $1,226 or more to their campaign. For Small Donor Elections candidates, this would include their in-kind donors--if those entities have given over $1,226 each. The Small Donor Elections program does not have to be disclosed as a donor.

The Office of Small Donor Elections does not oversee or enforce these provisions. Those provisions are enforced by the Auditor's office. If your campaign or organization has questions about it), please review their website at www.portland.gov/auditor/elections and direct your questions to their office.

# Glossary of Commonly Used Terms

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| Allowable contribution | A contribution of up to $350 per donor per election that is from an individual or in certain cases from an entity. |
| Certified candidate | A candidate who has been certified to use the program and has not been decertified. |
| City Matching Funds | Money from the Small Donor Elections Fund paid to a certified candidate to match eligible contributions. |
| Candidate campaign account | The participating candidate's campaign bank account. |
| Contested election | A mayoral or auditor election in which at least two candidates have a campaign finance entity. A Council election in which at least four candidates have a campaign finance entity. |
| Election cycle | The period beginning January 1 the year before the election and December 31 after the election. Candidates who use Small Donor Elections program must follow program rules for this period. |
| Family | This includes a spouse, child, parent or step-parent, domestic partners, parents-in-law, grandparents or grandchildren, and household members. |
| Loan or debt | Participating candidates are limited to a $5,000 loan balance at any given moment. This is not intended to limit the use of a campaign credit card, prohibit campaigns from being able to have vendors bill them after goods or services are provided, or pay reimbursable expenses (within reasonable limits in Administrative Rule 3). |
| Matchable contribution | A contribution of up to $350 per donor per election that is from an individual of at least 18 years of age who lives in Portland and who has not already maxed out their match to that candidate. |
| Matchable donor | An individual of at least 18 years of age who lives in Portland who is a allowed to give per federal law (citizen or green card holder) |
| Independent expenditure | An expenditure in support of or opposing a candidate or measure that was not coordinated with the candidate that benefits from the expenditure. |
| Individual | A person, as opposed to an entity (e.g. corporation). |
| Nonparticipating candidate | (1) A candidate who has not filed a Notice of Intent to use the program, (2) candidate who has filed and withdrawn a Notice of Intent to use the program, (3) a candidate who filed a Notice of Intent to use the program but did not apply for certification before the deadline, (4) a candidate who was applied for and was rejected from certification and does not apply again before the deadline, or (5) a candidate who was certified and then decertified. |
| Participating candidate | A candidate who has filed a Notice of Intent to use the program and has not been rejected from certification nor has the deadline for certification passed, or a candidate who has been certified to use the program and has not been decertified. |
| Seed money | Up to $875 of money from any source legal under federal or state law collected prior to certification. Campaigns cannot raise more than $5000 total in seed funding per election. |

# Supporting Documents and Resources

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| Small Donor Elections landing page | www.portland.gov/smalldonorelections |
| Small Donor Elections code, rules, forms | www.portland.gov/smalldonorelections/small-donor-elections-code-rules-and-program-forms |
| Small Donor Elections Certification form | Microsoft Word - 2024 Certification Application June 5 2024 |
| Auditor Elections landing page | www.portland.gov/auditor/elections |
| Secretary of State Campaign Finance page | State of Oregon: Elections - Campaign Finance Transparency & Education |
| Oregon Campaign Finance Manual | https://sos.oregon.gov/elections/Documents/campaign-finance.pdf |
| Auditor Candidate Guide | City of Portland Candidate Guide 2024 |
| Attestation form | Microsoft Word - 2026 Cash Donor English Form |
| Small Donor Elections Notice of Intent form | Microsoft Word - 2026 Notice of Intent 9 18 2025 |
| Council Tier 2 and 3 Application | Tier Application |
| Joint County Voters Pamphlet Statement Instructions | jcvp-01-rev-013125.pdf |
| Multnomah County Elections | Multnomah County Elections Division \| Multnomah County |
| Lawn Sign Rules | Lawn Sign: Title 32 Signs and Related Regulations \| Portland.gov |