

Oregon Secretary of State Bev Clarno
900 Court Street NE, Capitol Room 136
Salem OR 97310

Sent via email to oregon.sos@oregon.gov

October 12, 2020

Dear Secretary Clarno,

I am writing to file a complaint for Civil Penalties for Failure to File Timely or Sufficient Transactions under ORS 260.232 against Metro SW PAC; their treasurer, Lori L Piercy; and PAC directors, Julie Miller, Mark Cottle and Bart Dickson; as well as Kelly Sloop, Republican candidate for House District 37 and her PAC treasurer Natalie Newgard.

Community members started receiving campaign communications on behalf of Metro SW as early as the end of September. The communication prompting this complaint was a telephone push poll received by Jordan Ferris on September 22, 2020. When Ms. Ferris asked for more information on the origin of the call, she was told that the poll was sponsored by Metro SW PAC, a political action committee working to elect Sloop. On September 27, voters reported getting mass texts and push polls on behalf of the campaign for Kelly Sloop that included similar content.

However, in campaign finance filings with the Secretary of State, Metro SW has reported no transaction records for the poll or text campaigns described above, which would likely run into the thousands of dollars of campaign expenditures. This campaign activity has not been filed as an in-kind to the Sloop campaign, nor has the Sloop campaign disclosed any related transactions. We are now well past the deadline for reporting this campaign activity, and this appears to be a clear violation of campaign finance disclosure, not to mention the basic demands of transparency.

Additionally, there is ample evidence to show that this was not an independent expenditure undertaken solely by Metro SW PAC. Based on reporting from Pamplin Media (<https://pamplinmedia.com/ttt/89-news/483239-389600-prusak-supporters-criticize-sloop-for-misleading-attacks>), Julie Millers serves as both Metro SW PAC's director *and* Ms. Sloop's campaign manager. Metro SW PAC and the Sloop campaign are clearly working in collaboration on these campaign activities, and by law they are required to report those records to the public

and the Secretary of State as an in-kind. No reasonable person would believe that these were independent expenditures since Ms. Miller serves a leadership role in both organizations.

Given that seven day reporting began on September 22, Metro SW PAC should have reported the sponsoring of the poll as an in-kind no later than September 29. No such transaction has been disclosed, leaving voters completely in the dark about these activities. Oregon law lays out the clear requirements for disclosure and the penalties for failing to disclose, all of which should be applied to these violations.

Thank you,

A handwritten signature in black ink that reads "K.C. HANSON". The signature is written in a cursive, slightly slanted style.

K.C. Hanson
Chair, Democratic Party of Oregon

CC: Steve Trout, Director, Oregon Elections Division, Oregon Secretary of State via elections.sos@oregon.gov