



# League of Women Voters of Portland

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November 15, 2022

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To: Charter Review Commission and staff  
From: League of Women Voters of Portland  
Debbie Kaye, president  
Re: Independent Portland Elections Commission  
Support for Proposal #13, Pending Amendments

Dear Charter Commission members,

Thank you for your Phase II work to address the conflict of interest resulting from the current oversight by elected officials of Portland’s public campaign finance system, Small Donor Elections. The appropriate fix is a charter amendment creating an independent commission. With the addition of three critical amendments listed below, the League of Women Voters of Portland strongly urges adoption of Proposal #13 on the Independent Portland Elections Commission.

- **Amendment #1:** Ethics should be added to the type of program that can be delegated to the Independent Portland Elections Commission. To be clear, this needs to be a stand-alone addition. Do not consider either election ethics or campaign finance ethics, since those would be new and undefined terms.
- **Amendment #2:** Sufficient financial resources must accompany the delegation of responsibilities to the Independent Portland Elections Commission. Without resources, such delegation would be a hollow gesture, and this possibility must be proactively avoided by including in the charter amendment a requirement for resources.
- **Amendment #3:** Technical assistance to the Independent Portland Elections Commission by other city bureaus and departments is another resource that should be specified in the charter amendment.

These amendments are vital to ensure that the Independent Portland Elections Commission, with an appropriate scope of functions, can operate with adequate financial support and technical assistance.

With the proposed amendments, Proposal #13 reflects an appropriate level of detail to be included in a charter revision. Further detail belongs in city code and administrative rules. As long-time supporters of campaign finance reform, including public financing of campaigns, the League of Women Voters of Portland wholeheartedly supports making the campaign commission independent of elected officials in order to avoid conflict of interest concerns and build a solid foundation for a successful program. Thank you for your consideration of our comments.