



*Sent via email - Molly.Woon@sos.oregon.gov*

January 5, 2024

Molly Woon  
Elections Director  
Oregon Secretary of State  
255 Capitol St. NE  
Salem OR 97310

**RE: Complaint about potential campaign finance violations by Fix and Improve Measure 110 initiative petition campaign and request for investigation**

Dear Ms. Woon:

I submit this complaint about potential campaign finance violations by the Fix and Improve Measure 110 initiative petition campaign, their chief petitioners (Nate Sickler, Jerrod Murray, Juanita Swartwood), and their treasurer (Maryanne Krumm.) This campaign appears to be in current violation of campaign finance rules, reflecting their disregard for Oregon's transparency requirements and Oregon voters' right to know who is spending money to influence our state's elections.

**1. Chief Petitioners failed to file the required Statements of Organization for Fix and Improve Measure 110 Petition C (Initiative Petition 47) and Petition D (Initiative Petition 48) after making expenditures last year.**

According to Page 7 of the 2022 Oregon Campaign Finance Manual:

“The treasurer of an initiative, referendum, or recall petition committee must file a Statement of Organization not later than three business days after first receiving a contribution or making an expenditure after filing a prospective petition...”<sup>1</sup>

As of January 5, 2024, there has been no Statement of Organization filed for either Initiative Petition 47 or Initiative Petition 48. Had the committees not yet spent any monies, this may not be an issue. However, filings with the Elections Division show that Initiative Petitions 47 and 48 registered six paid petition circulators between the dates of October 20 and October 27, 2023.

On October 31, Initiative Petitions 47 and 48 submitted their initial 1000-required sponsorship signatures for verification by the Elections Division. Unless the proponents allege that volunteers collected those sponsorship signatures and that they did not ever pay any of their registered paid circulators for collecting signatures on Initiative Petition 47 and 48, the proponents are in violation of this legal requirement.

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<sup>1</sup> <https://sos.oregon.gov/elections/documents/campaign-finance.pdf>

In summary, petitioners were required to create their committee and file a Statement of Organization within three days of spending money. However nearly three months later, they still have not filed their Statement of Organization.

**2. The *Fix and Improve Measure 110 (Petition A)* committee is not appropriately reporting in-kind expenditures on behalf of the other petitions.**

An in-kind contribution is defined in the 2022 Oregon Campaign Finance Manual as “a good or service, other than money, having monetary value.” According to Page 32 of the 2022 Oregon Campaign Finance Manual:

“If a committee makes an expenditure for a good or service, and the expenditure is an in-kind contribution to another committee, the expenditure transaction must disclose In-Kind Expenditure Information identifying the committee(s) that received the in-kind contribution and the amount of the in-kind contribution.”<sup>2</sup>

The petition committee called *Fix and Improve Measure 110 (Petition A)*, which is affiliated with Initiative Petition 44, has made two expenditures totaling \$30,000 to a company called Blitz Canvassing in October and November 2023. The purposes for those expenditures as described in ORESTAR are “signature collection deposit” and “final signature collection fees,” respectively.

However, no paid circulators were ever registered to collect for Initiative Petition 44. No sponsorship signatures were ever submitted for verification for Initiative Petition 44. The only petitions in this slate of petitions that appear to have actually made signature gathering expenditures are Initiative Petitions 47 and 48, which have not established petition committees or filed statements of organization. The expenditures reported by *Fix and Improve Measure 110 (Petition A)* appear to be in-kind contributions to the Initiative Petition 47 and Initiative Petition 48 committees (if they existed), and they should be reported.

I respectfully ask the Elections Division to investigate this matter fully. My understanding is that the Fix and Improve Measure 110 initiative petition campaign is richly funded by corporate and billionaire donors, headed by the former chief of the Oregon prison system who is also a former state legislator and lawyer, and has hired legal counsel to represent them in official proceedings. As such, I presume that the campaign is well acquainted with Oregon law. The highest standards of transparency are not just lawfully required for this campaign; they are entirely fair.

In the Appendix below, screenshots from the Secretary of State’s website are provided as verification of the information set out in this letter. Thank you for your prompt attention to this matter.

Respectfully,



Sandy Chung  
Executive Director  
ACLU of Oregon

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<sup>2</sup> <https://sos.oregon.gov/elections/documents/campaign-finance.pdf>

## **APPENDIX**

- 1. Chief Petitioners failed to file the required Statements of Organization for Fix and Improve Measure 110 Petition C (Initiative Petition 47) and Petition D (Initiative Petition 48) after making expenditures last year.**

Paid circulators registered for Initiative Petitions 47 and 48 in October of last year:

	A	B	C	D
1	<b>ID#</b>	<b>First Name</b>	<b>Last Name</b>	<b>Effective Date</b>
2	2024-0133	Annika	Etchings	10.20.23
3	2024-0135	John	Garcia	10.20.23
4	2024-0257	Brandon	Yokie	10.20.23
5	2024-0258	David	Mills	10.20.23
6	2024-0259	Nova	Tucker	10.20.23
7	2024-0265	Chavis	Nourse	10.27.23
8				
9				

+ ≡ 47,48 ▾

No committees have been established in affiliation with Initiative Petitions 47 and 48, in spite of their expenditures. (“0 found for the above search criteria” when searching ORESTAR for these committees.)

### **Committee/Filer Search Results**

**Search Criteria :** Referendum/Petition Year=2024,Referendum/Petition Number=47, Approved Filings

**Results :** 0 found for the above search criteria

<b>Filer Name</b>	<b>ID</b>	<b>Office or Filer Description Party Affiliation</b>
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### **Committee/Filer Search Results**

**Search Criteria :** Referendum/Petition Year=2024,Referendum/Petition Number=48, Approved Filings

**Results :** 0 found for the above search criteria

<b>Filer Name</b>	<b>ID</b>	<b>Office or Filer Description Party Affiliation</b>
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3. The *Fix and Improve Measure 110 (Petition A)* committee is not appropriately reporting in-kind expenditures on behalf of the other petitions.

Coalition to Fix and Improve Measure 110 (Petition A) (23189)

**Transaction Detail**

[Back to Search Results](#) [Previous Transaction](#) [Next Transaction](#) [Help](#)

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**Transaction Information (Original)**

Transaction ID : 4711362	Transaction Date : 11/21/2023
Transaction Type : Expenditure	Due Date : 12/21/2023 11:59:00 PM
Transaction Sub Type : Account Payable	Filed Date : 12/15/2023 07:41:15 AM
Payment Method :	Check :
Amount : \$24,000.00	Aggregate : \$30,000.00
Interest Rate :	Repayment Schedule :
Description : final signature collection fees	Exam Letter Date : 12/22/2023
Agent :	Process Status : Complete
Payer of Personal Expenditure :	
Purpose : Management Services	

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**Address Book Information**

Address Book Type : Business Entity	
Name : Blitz Canvassing	
Address : 7600 E Eastman Ave Suite 405 Denver CO 80231	
Occupation :	Occupation Letter Date :
Employer Name :	

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**Other Information**

Associations :	
In-Kind/Independent Expenditures :	
CoSigner Obligations :	

Coalition to Fix and Improve Measure 110 (Petition A) (23189)

**Transaction Detail**

[Back to Search Results](#) [Previous Transaction](#) [Next Transaction](#) [Help](#)

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**Transaction Information (Original)**

Transaction ID : 4668482	Transaction Date : 10/15/2023
Transaction Type : Expenditure	Due Date : 11/14/2023 11:59:00 PM
Transaction Sub Type : Cash Expenditure	Filed Date : 10/18/2023 02:53:24 PM
Payment Method : Electronic Check	Check :
Amount : \$6,000.00	Aggregate : \$6,000.00
Interest Rate :	Repayment Schedule :
Description : signature collection deposit	Exam Letter Date : 11/06/2023
Agent :	Process Status : Complete
Payer of Personal Expenditure :	
Purpose : General Operational Expenses (need description)	

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**Address Book Information**

Address Book Type : Business Entity	
Name : Blitz Canvassing	
Address : 7600 E Eastman Ave Suite 405 Denver CO 80231	
Occupation :	Occupation Letter Date :
Employer Name :	

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**Other Information**

Associations :	
In-Kind/Independent Expenditures :	
CoSigner Obligations :	

**Secretary of State elections page on initiative petitions -  
https://sos.oregon.gov/elections/Pages/2024-irr.aspx - showing no signatures submitted for Initiative  
Petitions 44 and 45:**

## Petition 2024-044

Prospective petition was filed September 19, 2023. To begin the ballot title drafting process, chief petitioner must submit 1,000 sponsorship signatures.

### Subject Provided by Chief Petitioners

Fix and Improve Measure 110 A

 [\(view complete text of the initiative\)](#)

### Chief Petitioners

Nate Sickler, Resident of Medford, Oregon

Jerrold Murray, Resident of Portland, Oregon

Juanita Swartwood, Resident of Portland, Oregon

## Petition 2024-045

Prospective petition was filed September 19, 2023. To begin the ballot title drafting process, chief petitioner must submit 1,000 sponsorship signatures.

### Subject Provided by Chief Petitioners

Fix and Improve Measure 110 B

 [\(view complete text of the initiative\)](#)

### Chief Petitioners

Nate Sickler, Resident of Medford, Oregon

Jerrold Murray, Resident of Portland, Oregon

Juanita Swartwood, Resident of Portland, Oregon


**Secretary of State elections page on initiative petitions -**  
**<https://sos.oregon.gov/elections/Pages/2024-irr.aspx> - showing signatures submitted for Initiative**  
**Petitions 47 and 48:**

## Petition 2024-047

Prospective petition was filed October 11, 2023. To begin the ballot title drafting process, chief petitioner must submit 1,000 sponsorship signatures.

### Subject Provided by Chief Petitioners

Fix & Improve Measure 110-C

 [\(view complete text of the initiative\)](#)

### Chief Petitioners

Jerrold Murray, Resident of Portland, Oregon

Nathan Sickler, Resident of Medford, Oregon

Juanita Swartwood, Resident of Portland, Oregon

10/31/2023 Sponsorship signatures submitted for verification.


11/30/2023 Signature verification of sponsorship signatures completed. Petitions contains 1,328 signatures.

## Petition 2024-048

Prospective petition was filed October 11, 2023. To begin the ballot title drafting process, chief petitioner must submit 1,000 sponsorship signatures.

### Subject Provided by Chief Petitioners

Fix & Improve Measure 110-D

 [\(view complete text of the initiative\)](#)

### Chief Petitioners

Jerrold Murray, Resident of Portland, Oregon

Nathan Sickler, Resident of Medford, Oregon

Juanita Swartwood, Resident of Portland, Oregon

10/31/2023 Sponsorship signatures submitted for verification.

11/30/2023 Signature verification of sponsorship signatures completed. Petitions contains 1,415 signatures.