

1 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**
2 **FOR THE COUNTY OF MULTNOMAH**

3
4 In the Matter of: Validation Proceeding
5 to Determine the Legality of City of
6 Portland Charter Chapter 3, Article 3
7 and Portland City Code Chapter 2.10
8 Regulating Campaign Finance and
9 Disclosure.

Civil No. 19CV06544

**DECLARATION OF
CHLOE EUDALY**

10
11
12 I, CHLOE EUDALY, declare:

- 13 1. I am currently a Portland City Commissioner, having won election in November
14 2016.
- 15
16 2. During the 2016 election cycle, my campaign raised \$93,544. Of that, \$66,856
17 (71.5% of the total) consisted of contributions of \$500 or less, and \$53,871
18 (57.6% of the total) consisted of contributions of \$200 or less.
- 19
20 3. My main opponent, Steve Novick, raised \$606,617 in the 2016 election cycle.
21 Of that, \$288,548 (47.6% of the total) consisted of contributions of \$500 or less.
- 22
23 4. I was able to fund a successful campaign for Portland City Commissioner
24 primarily with contributions of \$500 or less.
- 25
26 5. I was able to successfully communicate with Portland voters by attracting
27 volunteers, having house parties, organizing and participating in rallies,
28 distributing lawn signs, producing and distributing innovative campaign
29 materials, utilizing low-cost electronic media to distribute campaign materials
30 and fundraise, employing advanced targeting to fundraise and distribute
31 campaign materials via direct mail, and by earning extensive coverage in the
32 local press by offering substantive solutions to Portland's problems.
- 33
34 6. Limiting campaign contributions to \$500 from each individual and political
35 committee will not render political association ineffective in campaigns for
36 Portland public office. It will not drive the sound of candidates' voices below
37 the level of notice or render campaign contributions pointless.
- 38
39 7. If Measure 26-200 had been in effect during the 2018 election cycle, various
40 membership organizations that contributed larger amounts to me would have
41 been able to create Small Donor Committees that could have contributed
42 amounts greater than \$500, as long as such committees did not receive any

1 contributions except from individuals in amounts of \$100 per calendar year or
2 less. So Measure 26-200 would not have limited my campaign to raising only
3 \$66,856 in donations of under \$500.
4

- 5 8. If Measure 26-200 had been in effect during the 2018 election cycle, my
6 campaign would not have faced the need to counter the widespread advertising
7 of my main opponent, paid for primarily by contributions of over \$500 each.
8

9 **I hereby declare that the above statement is true to the best of my**
10 **knowledge and belief, and that I understand it is made for use as evidence in**
11 **court and subject to penalty for perjury.**
12

13
14 Dated: May 7, 2019
15



16 Chloe Eudaly
17
18

Signed in Portland, Multnomah County, Oregon