## IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR THE COUNTY OF MULTNOMAH

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

Civil No. 19CV06544

DECLARATION OF CHLOE EUDALY

## I, CHLOE EUDALY, declare:

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

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

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

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

Dated: May 7, 2019

Chlor Endely

Chloe Eudaly

Signed in Portland, Multnomah County, Oregon