

July 10, 2020

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

Stephen Trout
Director, Elections Division
Oregon Secretary of State
Public Service Building Suite 501
255 Capitol St. NE
Salem, OR 97310

Re: Complaint Regarding Violations of Election Law – Our Oregon – Case No. 20-021

Dear Ms. Clarno and Mr. Trout,

On May 13, 2020, I filed a complaint with your office alleging violations of Oregon campaign finance law by the organization Our Oregon.

New evidence further substantiates those allegations, as documented below.

On July 9, 2020, Our Oregon filed a motion to intervene in *People Not Politicians v. Clarno*, a case currently before the U.S. District Court for the District of Oregon challenging the Secretary of State’s threshold and deadline for gathering initiative petition (IP) signatures in the midst of the COVID-19 pandemic.

Along with its motion to intervene, Our Oregon filed arguments opposing the Plaintiffs’ motion for a temporary restraining order, which were accompanied by a sworn declaration from Our Oregon’s executive director, Becca Uherbelau.

See **Exhibit A**, a copy of Our Oregon’s motion and supporting documents.

Allegation: Violations of ORS 260.035

Our Oregon admits it will be involved in organizing, leading and funding a campaign to defeat a ballot measure in 2020 pending the outcome of *People Not Politicians v. Clarno*.

Supporting Documentation

On page 2 of its motion, Our Oregon states:

“Our Oregon is opposed to IP 57 and would be involved in organizing a campaign against IP 57 if it were to qualify for the November 3, 2020 ballot.” (emphasis added)

See **Exhibit A**.

The above statement is neither a mistake nor an isolated occurrence.

On page 2 of her sworn declaration, Becca Uherbelau, the executive director of Our Oregon, states the following:

“Our Oregon is opposed to IP 57 and would lead, or be part of, any campaign to defeat IP 57 if it were to qualify for the November 3, 2020 General Election ballot.” (emphasis added)

On page 6 of her sworn declaration, Ms. Uherbelau further states:

“Allowing the Chief Petitioners to submit after the constitutional deadline (and at a lower threshold) would make it exponentially more difficult for Our Oregon, or anyone else, to organize an opposition campaign to IP 57. It takes months to build and fund a coalition in opposition to a ballot measure.” (emphasis added)

See **Exhibit A**.

Our Oregon admits that it would be involved in a campaign against IP 57 *after* it qualified for the general election – i.e., once it became a *measure* – and Ms. Uherbelau, in her sworn declaration made under penalty of perjury, further states that Our Oregon would likely “lead” any such campaign.

Furthermore, after admitting that Our Oregon would be involved in organizing the campaign against the ballot measure, Ms. Uherbelau argues that an unfavorable court ruling would make it more difficult for Our Oregon “to organize an opposition campaign” and, in the same line of reasoning, explains that “[i]t takes months to build *and fund* a coalition in opposition to a ballot measure.” (emphasis added).

Conclusion

Our Oregon’s statements further reveal that its true purpose is to influence ballot measure elections and that it receives contributions and makes expenditures for that purpose.

In light of the substantial evidence already presented to your office in Case No. 20-021, the evidence documented here further substantiates the allegation that Our Oregon has operated, and

continues to operate, as a political committee without filing a statement of organization with the Secretary of State as required by ORS 260.035.

Please do not hesitate to contact me if I can be of assistance.

Thank you,

A handwritten signature in black ink, appearing to read "Ben Straka". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ben Straka
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