



Dena Dawson
Elections Director

April 8, 2025
Sent Via Email Only

Oregon Taproot (21585)
Jerred Taylor, Treasurer



Re: Elections Division Case No. 24-067

Jerred Taylor:

On April 9, 2024 the Elections Division received an investigation request which alleged that you may have violated Oregon election law. Specifically, the request alleged that you violated ORS 260.057 and ORS 260.083 by incorrectly reporting transactions related to a contribution made in support of Bubba for Oregon (22907).

Pursuant to ORS 260.205(3) and ORS 260.345(3) the Elections Division opened an investigation into the allegations in the complaint.

RESPONSE TO THE ALLEGATIONS

The complaint alleged that Oregon Taproot incorrectly reported a personal expenditure for reimbursement made by Committee Director Lynette Shaw in the amount of \$3,468.00.¹ The transaction purpose was a cash contribution to Bubba for Oregon. Subsequently, Bubba for Oregon filed a cash contribution from Lynette Shaw in the amount of \$3,018.00² resulting in a discrepancy between the listed contributor names and contribution amounts in relation to the two transactions. The Elections Division sent you an inquiry requesting a response to questions set out in the letter.

In response to the inquiry, you provided email correspondence from Lynette Shaw and receipts showing that she made a \$3,468.00 payment to Bubba for Oregon on behalf of Oregon Taproot and requested reimbursement for the personal expenditure. The total amount broke down as follows: \$2,968.00 for a cash contribution to Bubba for Oregon and two tables at \$250.00 each for the fundraising event "Bubba for Oregon Campaign Kick Off Party." Lynette Shaw, not on behalf of Oregon Taproot, personally purchased a \$50.00 "Yamco Vibes" Sweatshirt at the Bubba

¹ See transaction ID 4709811.

² See transaction ID 4716219.

for Oregon Campaign Kick Off Party. The sweatshirt cost was not included in Oregon Taproot's personal expenditure for reimbursement transaction filing.

In reply to the Elections Division, Bubba for Oregon attested and provided contribution records to show that they received \$2,968.00 as a cash contribution and \$50.00 for a sweatshirt purchase from Lynette Shaw. Bubba for Oregon further explained that both the cash contribution and sweatshirt purchase were placed on a personal payment card and that at the time of the contribution, they were unaware that Lynette Shaw intended to submit the expense as a personal expenditure for reimbursement from Oregon Taproot. Bubba for Oregon has since amended this filing in ORESTAR³ to reflect the accurate amount and contributor, Oregon Taproot.

Further, Bubba for Oregon confirmed that Lynette Shaw purchased two tables at the event, "Bubba for Oregon Campaign Kick Off Party," for \$250.00 per table. The purchase of the fundraising tables was reported in ORESTAR as two separate \$200.00 cash contributions from Lynette Shaw.⁴ The remaining \$50.00 from each table, or \$100.00 in total, was reported as 'Items Sold at Fair Market Value'.⁵ Bubba for Oregon originally reported the cash contributions related to the fundraising tables as having been contributed by Lynette Shaw, again explaining that they were unaware that she made the table purchases on behalf of Oregon Taproot.

LEGAL FRAMEWORK AND ANALYSIS

ORS 260.057 requires political committees to file campaign finance transactions electronically using the ORESTAR system unless exempted by statute. Page 21 of the Campaign Finance Manual⁶ ("CFM") provides the deadline for filing transactions.

ORS 260.083 outlines the information that must be provided when reporting campaign finance transactions. For expenditures more than \$100.00, filers must provide the name of the payee, the amount, and purpose of each expenditure, and the city, or county if the payee is not located in a city, and state in which the payee is located. ORS 260.083(1)(b)(A).

A personal expenditure occurs when a person spends money on behalf of a committee and expects to be reimbursed by the committee. This includes charges on a personal credit or debit card. Two transactions must be filed to disclose personal expenditures and the subsequent reimbursement. CFM at 32.

³ Bubba for Oregon originally reported the total contribution from Lynette Shaw as \$3018.00 which includes the \$2,968.00 cash contribution Lynette Shaw made on behalf of Oregon Taproot and the \$50.00 sweatshirt purchase Lynette Shaw made through the same credit card transaction, see transaction ID 4716219. The transaction was amended on April 11, 2024 to update the contributor name, see transaction ID 4839688. The transaction was updated again on February 10, 2025 to reflect the accurate amount of \$2,968.00, see transaction ID 5213919. A new transaction was filed to report the personal sweatshirt purchase made by Lynette Shaw, see transaction ID 5213915.

⁴ See transaction IDs 4690575 and 4690576. Bubba for Oregon is required to update these transactions to reflect the accurate contributor, Oregon Taproot.

⁵ See transaction ID 4690551.

⁶ The Campaign Finance Manual (rev. 08/2023) was adopted by Oregon Administrative Rule 165-012-0005 and was the version of the manual in effect at the time of the alleged violations.

Detailed above, Bubba for Oregon confirmed that they received the entire cash contribution in the amount of \$3,468.00 made by Lynette Shaw on behalf of Oregon Taproot.⁷ Oregon Taproot correctly reported this transaction as a personal expenditure for reimbursement.⁸ They then filed a subsequent \$3,468.00 transaction showing the cash expenditure to Lynette Shaw as a reimbursement.⁹

DETERMINATION

The evidence obtained by the Elections Division does not substantiate the allegation that Oregon Taproot (21585) violated ORS 260.057 and ORS 260.083 by incorrectly reporting transactions related to a contribution made in support of Bubba for Oregon (22907). Oregon Taproot correctly filed both the transaction to disclose the personal expenditure made by Lynette Shaw on behalf of the committee to Bubba for Oregon and the subsequent reimbursement. Bubba for Oregon confirmed receipt of the entire cash contribution in the amount of \$3,468.00.

Payees rely on contributors providing accurate and complete information when filing transactions. In order to further the goals of transparency and accuracy in campaign finance filings, it is important to provide accurate information. When persons acting on behalf of a committee intend to submit an expense as a personal expenditure for reimbursement, they should ensure they communicate the true contributor to the payee.

This concludes the investigation into the complaint; this case is closed. Please contact us at investigations.sos@sos.oregon.gov if you have any questions about the content of this letter.

Sincerely,

Courtney Ryman

Investigations Specialist

⁷ The total contributions from Lynette Shaw on behalf of Oregon Taproot were reported by Bubba for Oregon under transaction IDs 5213919, 4690575, 4690576, and 4690551.

⁸ See transaction ID 4709811.

⁹ See transaction ID 4709812.