

June 25, 2025

**Position on Bills at 2025
Session of Oregon Legislature:**

HB 3392 -5: Oppose



Less than 17 hours before the only public hearing, the Oregon Legislature has introduced an amendment to a placeholder bill ([HB 3392](#)) to delay until 2031 all of the political campaign contribution limits adopted by the Legislature in 2024 (in HB 4024). The amendment would also delay all of the additional requirements for disclosure of the sources of funds used in political campaigns until 2032.

Honest Elections Oregon (HEO) is a coalition of democracy-focused groups, including the League of Women Voters of Oregon, Oregon Common Cause, OSPIRG, and others. HEO was responsible for drafting and gathering over 100,000 signatures on Initiative Petition 9 of 2024, which led to the enactment of HB 4024 in the 2024 session of the Oregon Legislature.

The 2024 short session adopted HB 4024 on a truncated time schedule. Leaders of the Legislature at that time stated that technical problems in the bill would be corrected in the 2025 regular session. HEO for the past full year has suggested technical corrections to HB 4024. The latest version of those recommendations was attached to our earlier testimony filed today.

Honest Elections Oregon opposes any changes to HB 4024 that impair its campaign contribution limits, disclosure requirements, or enforcement provisions. We also oppose any further delay in implementation. Its contribution limits do not take effect until January 1, 2027, with its disclosure requirements taking effect January 1, 2028. That afford ample time for preparing the necessary rules and processes.

HB 3392 -5 fundamentally violates the agreement between the 2024 Legislature and Honest Elections Oregon.

The excuse suddenly offered for the amendment is a letter by Oregon Secretary of State Tobias Read, complaining about the lack of time to write the rules

necessary to implement HB 4024. The letter was requested by the Democratic and Republican leaders of the Legislature on June 17. It was written on June 19 and revealed on June 24. But there has been no lack of time. HB 4024 already provided a 34-month period from early March 2024 to the effective date of its campaign contribution limits in January 2027. HB 4024 also provided a 46-month period before its additional disclosure requirements would take effect in January 2028. That is ample time to write implementation rules, as confirmed by the filed testimony of national experts from the Campaign Legal Center:

But it is simply unnecessary to delay these requirements—passed in 2024—until the 2030s, and we are not aware of other jurisdictions providing such a protracted implementation period for similar reforms.

Our programming expert, Seth Woolley, has filed testimony that the approach advocated by the Secretary of State to implement HB 4024 is fundamentally flawed. Mr. Woolley has served as principal or senior software engineer for StormQuant, Uber, Inc., and deCarta, Inc. The Secretary states his misconception that he cannot contract for programming, until all the final rules are adopted. Mr. Woolley points out:

I've heard that there is a theory that software would need to wait until after the rules are finalized before even starting the bidding process. This way of managing software projects is called "waterfall" methodology and it is inappropriate in this case. Projects with limited resource constraints such as time or money use what's known as an "agile" methodology, where instead of strictly sequencing development in hard phases, engineering is done iteratively on smaller projects until the project is complete. In this case, what the statutes require is already clear and that is the minimum viable project. As rules are finalized, the project is scoped larger for later phases until the work is done.

This is totally normal.

As a software engineer and software architect with decades of experience in accounting and marketplace management software, and database system patents in complex spatial analysis, I have observed Portland and Multnomah County implement campaign finance rules as well as a much more sophisticated a public funding program in Portland using an agile development process akin to how Silicon Valley and Silicon Forest software engineering startups (and big companies) work. I was thus shocked by the idea that software can't be built while rules are being finalized. It's totally false.

45 other states have implemented campaign contribution limits and disclosure requirements. So have Multnomah County and City of Portland, which were prepared to implement them within a few months of their adoption by the voters. Is Oregon government so incompetent that it cannot manage this, even when already given essentially 3 years to prepare for the contribution limits and 4 years to prepare for the disclosure requirements?

Further, the testimony of the administrator of the City of Portland's program of

public funding of campaigns, Susan Mottet, suggests:

If the Secretary of State's office is not capable of implementing contribution limits and disclaimer laws, it can ask the City of Portland or Multnomah County to enter into an intergovernmental agreement to implement it for them. Both currently implement contribution limits and disclaimer requirements. Both implemented contribution limits virtually overnight after an Oregon Supreme Court decision suddenly upheld them.

That Court decision was in April 2020.

Also, the more complex technical tasks stem not from the HB 4024 requirements but from the separate task of updating ORESTAR, which the Secretary was working on anyway. The HB 4024 contribution limits can be implemented without substantial changes to ORESTAR. The City of Portland and Multnomah County have used ORESTAR to implement their campaign contribution limits for over 5 years.

News articles about HB 3392 were published on June 24 by [Oregon Public Broadcasting](#) and by [Oregon Capital Chronicle](#).

Honest Elections Oregon

Daniel Meek
authorized testifier
dan@meek.net
503-293-9021