1/25/2024 12:21 PM			
24CV03991			

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5	IN THE CIRCUIT COURT C	OF THE STATE OF OREGON			
6	FOR THE COUNTY	Y OF MULTNOMAH			
7	GOVERNMENT ACCOUNTABILITY &	Case No.			
8	<b>OVERSIGHT</b> , a Wyoming nonprofit				
9	corporation,	COMPLAINT			
10	Plaintiff,	(Oregon Public Records Law; Declaratory and Injunctive Relief)			
11	V.	CLAIM NOT SUBJECT TO MANDATORY			
12	COUNTY OF MULTNOMAH, and the COUNTY COMMISSION OF	ARBITRATION			
13	MULTNOMAH,	This case is to take precedence pursuant to ORS 192.431			
14	Defendants.	Prayer: Declaratory and Injunctive Relief			
15		Fee Authority: ORS 21.135(1), (2)(a), (f)			
16					
17					
18	Plaintiff Government Accountability & (	Oversight, a Wyoming Nonprofit Corporation, by			
19	and through its attorney, Shawn M. Lindsay, brings this complaint against the County of				
20	Multnomah and the County Commission of Multnomah, as the custodians of public records				
21	requested by the Plaintiff, and in support thereof	f, avers as follows:			
22	INTROD	DUCTION			
23	1				
24	This is an action for declaratory and in	junctive relief under the Oregon Public Records			
25	Law, Or. Rev. Stat. ("ORS") §§ 192.311, et se	eq., to enforce the right to inspect certain public			
26	records in the custody of the County of Multnon	nah.			
	Page 1 – COMPLAINT FOR DECLARATORY AND INJU	UNCTIVE RELIEF			

The Defendant Multnomah County is the county government duly formed under the laws of the State of Oregon and is a body politic and corporate. The Multnomah County Board of Commissioners is duly elected to exercise the powers of Multnomah County. Both the County of Multnomah and the County Commission of Multnomah are the legal and physical custodians of the records at issue in this lawsuit and are the "public body" within the meaning of the Oregon Public Records Law, ORS 192.311(4), and are required under ORS 192.314(1) to make available for public inspection "any public record of a public body in this state, except as otherwise expressly provided by ORS 192.338 [Exempt and nonexempt public record to be separated], 192.345 [Public records conditionally exempt from disclosure] and 192.355 [Public records exempt from disclosure]."

#### PARTIES

#### 3.

Plaintiff Government Accountability & Oversight ("GAO") is a nonprofit organization incorporated in the State of Wyoming which uses state and federal open records laws to reveal and educate the public on private influences on governmental policy and on the use of its powers and resources. Part of GAO's effort has been the record request at issue in this matter.

4.

Defendant Multnomah County is the county government duly formed under the laws of the State of Oregon and is a body politic and corporate. The Multnomah County Board of Commissioners is duly elected to exercise the powers of Multnomah County as elected officials contemplated in ORS 192.427, and its office is the custodian of records sought in this action. ORS 192.311(2)(b).

## JURISDICTION AND VENUE

#### 5.

This Court has subject matter jurisdiction, pursuant to ORS 192.411(2) and ORS 192.427.

Page 2 - COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Venue is proper in Multnomah County Circuit Court pursuant to ORS 192.411(2) and ORS 192.427.

7.

ORS 192.401 permits, but does not require, an aggrieved public records requester to seek District Attorney review of agency withholdings. Given Multnomah County's role as the withholding agency and that the County has filed the legal action which serves as the basis for its claim of privilege in withholding the records at issue in this matter, Plaintiff did not first seek District Attorney review of Multnomah County's own withholdings.

8.

This Court is required to review the District Attorney's and/or Multnomah County's response under the Oregon Public Records Law *de novo*, ORS 192.431(1), which provides, in pertinent part, "The court shall determine the matter de novo and the burden is on the public body to sustain its action. The court, on its own motion, may view the documents in controversy in camera before reaching a decision."

#### FACTUAL ALLEGATIONS

#### 9.

Plaintiff Government Accountability & Oversight requested, in a single two-part Public Records Law request, copies of correspondence sent to or from the County Office of Sustainability Director and/or one County Commissioner, and also of the then-Chair of the Multnomah County Commission, which correspondence also included a single identified email domain of an outside activist group, the "Center for Climate Integrity" (CCI) ("@climateintegrity.org"). Each prong of the two-part request covered a distinct period of time, one for the two employees and a different period of time for the Commission Chair. A copy of the July 5, 2023 request is attached hereto and incorporated herein as **Exhibit "A**," which is a true and correct copy of correspondence between the parties.

Page 3 - COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

The requested records are public records, are of public interest and relevant to important and controversial matters involving Multnomah County's involvement with an outside pressure group, CCI, which public records released by other jurisdictions show recruits governmental "climate" plaintiffs to file lawsuits against energy companies including by, e.g., helping ghostwrite legal memoranda recruiting such plaintiffs and arranging for local climate activists to serve as front-facing advocates lobbying such plaintiffs.

11.

Plaintiff paid \$150.00 to process this request.<sup>1</sup> On September 18, 2023, Multnomah County provided fourteen (14) pages of emails reflecting the scheduling of Zoom meetings with the outside pressure group. The email providing these records stated, in toto, "Please find enclosed the records you requested. A few of the responsive records are exempt from disclosure because they are records pertaining to litigation. ORS 192.345(1).)." A copy of the September 18, 2023 email is attached hereto and incorporated herein as Exhibit "B," which is a true and correct copy of correspondence between the parties.

12.

Plaintiff states on information and belief that the records withheld are not privileged and exempt from release under Oregon's public records law, and that some even have been previously released to other parties, in addition to the outside correspondents using @climateintegrity.org email addresses.

13.

These withholdings of responsive, non-exempt records in full and in some cases reasonably segregable information are improper.

///

///

<sup>&</sup>lt;sup>1</sup> See **Exhibit B** for the record of Plaintiff trying to pay this fee and obtain the requested records. Page 4 – COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

14.

Correspondence with outside parties using the @climateintegrity.org email domain is not legitimately exempt from the Public Records Law and the Defendants have improperly searched, improperly failed to identify to Plaintiff, and/or otherwise improperly withheld such records. Similarly, Defendants have the obligation to redact reasonably segregable information from other records, e.g., discussing or adding to email "threads" with those outside correspondents, but have failed to satisfy that obligation in response to this request, all without demonstrating any countervailing interest to outweigh the public interest in releasing information relating to County of Multnomah solicitation from private activists seeking the County file litigation. Although Defendants did file a lawsuit sought by and apparently assisted in some way by the Center for Climate Integrity, *County of Multnomah v. Exxon Mobil Corp., et al.*, Circuit Court of the State of Oregon for the County of Multnomah, Case No. 23CV25164, Defendants have not demonstrated the threshold requirement that this litigation triggers an exemption from public release of the Defendants' dealings with these outside activists.

#### 15.

Further, the exemption found in ORS 192.345(1) exempts only that information compiled or acquired for use in litigation, not that complied in the ordinary course of business of the agency. *Lane County Sch. Dis. v. Parks*, 55 Or. App. 416, 420 (1981). If the Center for Climate Integrity activists were part of Defendants' preparation of the aforementioned lawsuit, Defendants must establish that and how it applies for these purposes to each record withheld and to all information contained therein.

16.

To the extent any withheld information is arguably subject to the pending litigation exemption, the public interest in information that illuminates the operations of a government agency, specifically the principal law enforcement agency of the State of Oregon, as it is being recruited by outside parties to use the agency's powers to advocate for the imposition of a

Page 5 – COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

restrictive regulatory regime and recruiting other, private parties to advise it on doing so must be considered.

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17.

The Defendants' conclusory response and failure to redact or to justify its withholding of some unspecified number of records in response to the request at issue in this matter do not provide the information necessary to make an informed analysis of whether each withheld record meets the requirements of ORS 40.225.

18.

The requested records are public records within the meaning of the Oregon Public Records Law, ORS 192.311(5), and contain information that is not exempt from disclosure. The requested information is not exempt from inspection as the public interest demands the release of information evidencing coordination of the Attorney General and Multnomah County with outside advocates and/or lobbyists, with whom Multnomah County has no privilege but only an ideological alignment. These records reflect theorizing on the advancement of a particular, federal regulatory scheme and otherwise engaging in non-exempt discussion of personalities and events. Further, the Defendants have not met the burden of establishing that the redacted and withheld records pertain to any litigation currently ongoing or reasonably likely to occur as established in ORS 192.345(1) or that release is contrary to the public interest. Even assuming, *arguendo*, that the records may have been protected at one point by any legal privilege, such privilege was waived because the records were shared outside the scope of any privilege.

19.

Any person has a right to inspect public records of public bodies in the state unless the records are expressly exempted from disclosure. ORS 192.314; *In Def. of Animals v. Oregon Health Sciences Univ.*, 199 Or. App. 160, 168 (2005).

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Page 6 – COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

1	20.
2	The custodian of a public record must provide a person who asks to inspect a record a
3	"reasonable opportunit[y]" to inspect or copy it, ORS 192.318(1) and 192.324(1)(b), barring
4	satisfaction of its burden to establish exemption of the withheld information.
5	21.
6	Defendants' response does not satisfy the statutory requirements but instead provides a
7	conclusory justification for redacting public records.
8	
9	FIRST CLAIM FOR RELIEF Duty to Produce Records – Oregon Public Records Law
10	Declaratory Judgment
11	22.
12	Plaintiff re-alleges paragraphs 1-21 as if fully set out herein.
13	23.
14	Plaintiff is entitled to records subject only to legitimate withholding.
15	24.
16	Plaintiff has no requirement to further pursue its administrative remedies.
17	25.
18	Plaintiff asks this Court to enter a judgment declaring that:
19	a. The information requested in the July 5, 2023 request are agency records subject to the
20	Oregon Public Records Law;
21	b. Defendants' refusal to provide information supporting its withholding in full of some
22	unstated number of records is unlawful;
23	c. The withheld, requested information is not exempt under ORS 192.345(1) as it is in the
24	public interest to release the records and Defendants have not demonstrated any litigation is
25	ongoing or reasonably likely to occur which supports exempting any withheld record, or that the
26	///
	Page 7 – COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

1	withheld information is privileged on those or other grounds, or that any privilege has not been
2	waived;
3	d. The withheld, requested information has already been released to outside parties
4	including but not limited to those using @climateintegrity.org email addresses and does not meet
5	the requirements of ORS 40.255 to be protected confidential communications;
6	e. Defendants' refusal to provide responsive records is unlawful;
7	f. Defendants' selective disclosure of responsive records is unlawful;
8	g. Defendants' search failing to produce certain records is unlawful; and
9	h. Defendants must produce responsive records.
10	SECOND CLAIM FOR RELIEF
11	Duty to Produce Records – Oregon Public Records Law
12	Injunctive Relief
13	26.
14	Plaintiff re-alleges paragraphs 1-25 as if fully set out herein.
15	27.
16	Plaintiff is entitled to injunctive relief compelling Defendants to provide Plaintiff the
17	withheld information which is responsive to Plaintiff's request.
18	28.
19	Plaintiff asks the Court to enter an injunction ordering the Defendants to provide Plaintiff
20	unredacted documents response to its request within 10 business of the date of the order.
21	THIRD CLAIM FOR RELIEF
22	Costs and Fees
23	29.
24	Plaintiff re-alleges paragraphs 1-28 as if fully set out herein.
25	///
26	///
	Page 8 – COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF
	Juris Law LLP Three Centerpointe Drive, Suite 160 Lake Oswego, OR 97035 P: 503.968.1475   F: 503.968.2003

1	50.
2	Pursuant to the Oregon Public Records Law, Plaintiff is
3	ORS 192.431(3) ("If a person seeking the right to inspect or to
4	prevails in the suit, the person shall be awarded costs and disbur
5	fees at trial and on appeal. If the person prevails in part, the cou
6	person costs and disbursements and reasonable attorney fees
7	appropriate portion thereof.").
8	31.
9	Plaintiff asks the Court to order the Defendants to pay rea
10	litigation costs reasonably incurred in this case.
11	WHEREFORE, pursuant to ORS 192.411, 192.427,
12	follows:
13	a. That this Court assume jurisdiction over this action;
14	b. For an order requiring the Defendants to produce a lo
15	can be evaluated and challenged by the Plaintiff;
16	c. For an order requiring the Defendants to produce a de
17	specifics of the search(es) conducted in response to P
18	parties conducting the search, what repositories they
19	searched there;
20	d. For an order requiring the Defendants to submit the r
21	camera review;
22	e. For an order enjoining Defendants from withholding
23	ordering the production of such unredacted records for
24	f. For a judgment awarding Plaintiff costs and disburses
25	fees incurred in this proceeding, pursuant to ORS 192
26	///
	Page 9 – COMPLAINT FOR DECLARATORY AND INIUNCTIVE RELIEF

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Page 9 - COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Juris Law LLP Three Centerpointe Drive, Suite 160 Lake Oswego, OR 97035 P: 503.968.1475 | F: 503.968.2003

entitled to recover costs and fees. receive a copy of a public record ursements and reasonable attorney urt may in its discretion award the es at trial and on appeal, or an

easonable attorney's fees and other

and 192.431, Plaintiff prays as

- og of any withheld records which
- leclaration attesting to the Plaintiff's request including the searched and when they
- records at issue to the Court for in
  - the records outlined above and for inspection by Plaintiff;

ements and reasonable attorney 92.490(3);

1	g. Preferential docketing of this case over other matters pursuant to ORS 192.431(2);
2	and
3	h. For such other relief as the Court deems equitable and just.
4	
5	DATED this 25th day of January 2024.
6	
7	JURISLAW LLP
8	<u>s/ Shawn M. Lindsay</u> Shawn M. Lindsay, OSB #020695
9	shawn@jurislawyer.com
10	Of Attorneys for Plaintiff Trial Attorney:
11	Shawn M. Lindsay, OSB #020695 Attorneys for Plaintiff
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	Page 10 – COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF
	Juris Law LLP
	Three Centerpointe Drive, Suite 160

Ш

Lake Oswego, OR 97035 P: 503.968.1475 | F: 503.968.2003

# **EXHIBIT** A

### **REQUEST UNDER THE OREGON PUBLIC RECORDS LAW**

July 5, 2023

Multnomah County, OR

### BY EMAIL: julie.sullivan-springhetti@multco.us

To Whom It May Concern:

On behalf of Government Accountability & Oversight (GAO) — a non-profit public policy organization dedicated to transparency in government and with an active public dissemination and media program — pursuant to the pursuant to the Oregon Public Records Law, ORS 192.311, *et seq.*, I hereby request copies of

1) all electronic correspondence and accompanying information (metadata and any attachments), sent to or from or which copies (including cc: and bcc:) i) John Wasiutynski, and/or ii) Jessica Vega Pederson, which is dated at any time from March 1, 2022 through July 5, 2023, inclusive, that is also to or from or copies any email address ending with @climateintegrity.org.

2) Please also provide copies of all electronic correspondence and accompanying information (metadata and any attachments), sent to or from or which copies (including cc: and bcc:) (then-) Multnomah County Chair **Deborah Kafoury**, dated at any time from **January 1, 2021 through January 31, 2022**, inclusive, that is also to or from or copies any email address ending with **@climateintegrity.org**.

These search terms are not case sensitive.

We request that the County conduct a non-conflicted search, as necessary to fulfill its obligation to conduct a reasonable search. A non-conflicted and therefore proper processing of this request does not merely entail asking the employee named in the request if they possess responsive information. We request that the County assert in its response whether that response is based on a search conducted by the faculty identified in the request, or by another party.

Any records meeting this request's search parameters are inherently related to the employee's work in a policy position at this public institution.

In the event that the County's custodian of public records determines that a release of a given record would contain confidential or private information or otherwise seek to withhold information, we request to state the reasons for any such withholdings.

We request entire "threads" of which any responsive correspondence is a part, regardless of whether any portion falls outside of the above time parameter.

We understand that in some instances a public body may charge a fee for the cost of the search, examination, review, copying, separation of confidential from nonconfidential information, and mailing costs. If your Office expects to seek a charge associated with the searching, copying or production of these records, please provide an estimate of anticipated costs.

As noted earlier in this request, GAO is a non-profit public policy organization dedicated to informing the public of developments in the area of energy and environmental issues and relationships between governmental and non-governmental entities as they relate to those issues. GAO's ability to obtain fee waivers is essential to this work. GAO intends to use any responsive information to continue its work highlighting the nexus between interested non-governmental entities and government agency decision-making. The public is both interested in and entitled to know how regulatory, policy and enforcement decisions are reached. GAO ensures the public is made aware of its work and findings via media, its websites govoversight.org and climatelitigationwatch.org dedicated to broadly disseminating energy and environmental policy news and developments. The public information obtained by GAO have been relied upon by established media outlets, including the Washington Times and Wall Street Journal editorial page.

GAO requests records on your system, e.g., its backend logs, and does not seek only those records which survive on an employee's own machine or account. We do not demand your office produce requested information in any particular form, instead **we request records in their native form**, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standard. The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

GAO looks forward to your response. In the event you have any questions, please feel free contact me at the below email address. Thank you for your prompt attention, time and consideration to this matter.

Respectfully submitted, Joe Thomas Joe@govoversight.org

# **EXHIBIT B**



#### **Re: Open Records Request**

1 message

Courtney Lords <courtney.lords@multco.us> To: GAO <info@govoversight.org> Cc: Angie Alcorn <angie.alcorn@multco.us>, Joe Thomas <joe@govoversight.org>

Dear, Joe:

Please find enclosed the records you requested. A few of the responsive records are exempt from disclosure because they are records pertaining to litigation. ORS 192.345(1).

Regards,

Courtney Lords Senior Assistant County Attorney Office of Multnomah County Attorney 501 SE Hawthorne Blvd., Suite 500 Portland, OR 97214 Ph: (503) 988-3138 Fx: (503) 988-3377

**NOTICE:** This communication, including any attachments, may contain privileged or other confidential information. If you have received this communication in error, please advise the sender by reply email and immediately delete the communication without copying or disclosing the contents. Thank you.

On Tue, Sep 12, 2023 at 3:33 PM Courtney Lords <courtney.lords@multco.us> wrote: | Dear Joe,

My apologies, we thought the records were already pulled from our system but they were only identified, not produced. We are working on that now and will have them to you tomorrow.

Thank you,

Courtney Lords Senior Assistant County Attorney Office of Multnomah County Attorney 501 SE Hawthorne Blvd., Suite 500 Portland, OR 97214 Ph: (503) 988-3138 Fx: (503) 988-3377

**NOTICE:** This communication, including any attachments, may contain privileged or other confidential information. If you have received this communication in error, please advise the sender by reply email and immediately delete the communication without copying or disclosing the contents. Thank you.

On Tue, Sep 12, 2023 at 7:50 AM GAO <info@govoversight.org> wrote:

External Sender - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

Hello,

We are checking in on this.

Thank you in advance.

On Wed, Aug 30, 2023 at 7:42 PM Courtney Lords <<u>courtney.lords@multco.us</u>> wrote: Dear Government Oversight,

I am hoping to have these records to you by early next week when my paralegal is back in the office.

Thank you,

**Courtney Lords** Senior Assistant County Attorney Office of Multnomah County Attorney 501 SE Hawthorne Blvd., Suite 500 Portland, OR 97214 Ph: (503) 988-3138 Mon, Sep 18, 2023 at 4:42 PM

Exhibit B to Complaint Page 1 of 4 **NOTICE:** This communication, including any attachments, may contain privileged or other confidential information. If you have received this communication in error, please advise the sender by reply email and immediately delete the communication without copying or disclosing the contents. Thank you.

On Tue, Aug 29, 2023 at 11:55 AM GAO <info@govoversight.org> wrote:

External Sender - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

Thank you, that has been taken care of!

On Tue, Aug 29, 2023 at 1:36 PM William Navarro <william.navarro@multco.us> wrote: Good morning all,

Thanks for confirming the check payment has not yet been cashed. Would you be able to pay via Credit Card? If so, please contact Pamela (cc'd here) at **503-988-7542** and she can take the payment over the phone so Communications can release the records to you. If payment is made via Credit Card, please put a stop payment on the check that was issued so you are not inadvertently charged twice.

Will

On Tue, Aug 29, 2023 at 8:05 AM GAO <info@govoversight.org> wrote:

External Sender - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

Hello,

Our bank/the image shows the check was processed, and mailed to the address provided, on July 13, 2023. There is no indication it has been cashed.

So, as agreed on the 22nd, please inform us of an alternate means of payment.

Thanks in advance.

On Mon, Aug 28, 2023 at 7:18 PM Courtney Lords <courtney.lords@multco.us> wrote: Dear Joe,

Our Finance team was unable to identify payment with what you provided. I have copied Will Navaro from Finance to this email. He has asked for the following information to help them locate the payment:

I was researching this and could not find any check deposits matching that dollar amount and account number 9488, Can the payor confirm what date the check was deposited? If they can provide a copy of the deposited check from their bank, we should be able to identify where it was deposited.

Thank you,

**Courtney Lords** 

Senior Assistant County Attorney Office of Multnomah County Attorney 501 SE Hawthorne Blvd., Suite 500 Portland, OR 97214 Ph: (503) 988-3138 Fx: (503) 988-3377

**NOTICE:** This communication, including any attachments, may contain privileged or other confidential information. If you have received this communication in error, please advise the sender by reply email and immediately delete the communication without copying or disclosing the contents. Thank you.

On Tue, Aug 22, 2023 at 6:58 AM GAO <info@govoversight.org> wrote:

🛃 External Sender - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

Hello, we see the check was processed over five weeks ago and so are checking on the status of this request.

Jul 11, 2023	Jul 13, 2023	Processed	Multnomah County (uest)	Checking 9448	\$150.00	$\bigcirc \bigcirc$
Ne look f	orward to	o your res	sponse.			
For	warded mes	sage				
From: Cou	rtney Lords	0	ords@multco.us	>		
Date. Weu	, 501 20, 202	.0 at 2.001 W	1			Evhih

Exhibit B to Complaint Page 2 of 4 Subject: Re: Open Records Request To: Denis Theriault <denis.theriault@multco.us> Cc: GAO <info@govoversight.org>, Joe Thomas <joe@govoversight.org>, Angie Alcorn <angie.alcorn@multco.us>

Hello,

I'm just following up on this because Denis is out of the office and the Communications Office just moved locations.

If you would like us to produce the records please provide payment.

Thank you,

Courtney Lords Senior Assistant County Attorney Office of Multnomah County Attorney 501 SE Hawthorne Blvd., Suite 500 Portland, OR 97214 Ph: (503) 988-3138 Fx: (503) 988-3377

**NOTICE:** This communication, including any attachments, may contain privileged or other confidential information. If you have received this communication in error, please advise the sender by reply email and immediately delete the communication without copying or disclosing the contents. Thank you.

On Tue, Jul 11, 2023 at 9:56 AM Denis Theriault <denis.theriault@multco.us> wrote: Hi, Mr. Thomas.

I'm following up on my acknowledgement response sent July 6. The County has identified 16 records, and the estimated cost to produce them is \$150.00.

Oregon Public Records Law allows agencies to recover their actual costs in fulfilling a public records request. I am writing to inform you of the costs of your requested records. We will process your request when we receive this payment.

Please make checks payable to:

Multnomah County Multnomah County Communications Office 501 S.E. Hawthorne Blvd, Suite 600 Portland, OR 97214 Attn: Records Reguest

Thank you, DT

Denis Theriault (pronouns: him/he/his) Deputy Communications Director Multnomah County c. 510.875.8546

On Thu, Jul 6, 2023 at 12:00 PM GAO <info@govoversight.org> wrote:

External Sender - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

Thank you for your response.

On Thu, Jul 6, 2023 at 12:08 PM Denis Theriault <denis.theriault@multco.us> wrote: Hi, Mr. Thomas,

I'm writing to acknowledge your request. We will review your request to determine if the County has responsive records and provide you a cost estimate for assembling those records for which the County does not claim an exemption from disclosure.

Thank you, DT

Denis Theriault (pronouns: him/he/his) Deputy Communications Director Multnomah County c. 510.875.8546

On Wed, Jul 5, 2023 at 2:37 PM GAO <info@govoversight.org> wrote:

ڬ External Sender - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

Exhibit B to Complaint Page 3 of 4



