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

JACQUELINE YERBY, an individual,

 Petitioner,

vs.

ROBERT TAYLOR, in his official capacity as
City Attorney for the City of Portland,

 Respondent.

No. _____

PETITION FOR REVIEW OF BALLOT
TITLE (“INITIATIVE PDX24OL-02”)

Expedited consideration requested per
ORS 250.296(3)

INTRODUCTION

1.

This is a petition for review of the ballot title for prospective City Initiative Petition PDX24OL-02 (“the Initiative”), an initiative petition that its proponents say “increases the number of Portland Police patrol officers.” Despite this clear focus on expansion of police power and presence, the Initiative’s ballot title tells voters that one of the Initiative’s major effects will be to increase “street response services.” This is not accurate.

2.

In Portland, “street response” has a specific connotation that excludes police. The City created the widely popular and successful Portland Street Response program as a community-driven vision specifically intended to remove police presence from crisis responses to

1 community members experiencing emergency mental and behavioral healthcare needs. The
2 hope was that this reimagined response would disrupt the history of Portland Police violence
3 against people experiencing mental health crises and ensure that appropriate professionals were
4 dispatched to people needing healthcare not handcuffs.

5 3.

6 Portland Street Response and the Portland Police are thus fundamentally and quite
7 intentionally distinct public services provided by the City of Portland through separate
8 programs with separate staff, goals, budgets, and procedures. Yet Respondent Robert Taylor,
9 City Attorney, attempts to inform voters about the prospective ballot measure seeking to
10 expand police patrols, including expanding police involvement in social service responses, by
11 generically describing the Initiative in its ballot title as one that would increase “street
12 response.”

13 4.

14 None of the Initiative’s proposed amendments to the City Charter increase funding or
15 capacity for the Portland Street Response program, the City’s “street response” service. And
16 by its terms, the Initiative’s amendments *cannot* be reference to Portland Street Response
17 because the Initiative seeks to “increase and maintain street response services that include
18 trained social workers *working with* sworn police officers,” (emphasis added) but Portland
19 Street Response “follows the directive to keep this program separate from police.”¹

20 5.

21 The Initiative’s ballot title misleadingly repeats the phrase “street response services” in
22 every component – the Caption, the Question, and the Summary. To add to the confusion, the

¹ *Portland Street Response Frequently Asked Questions*, CITY OF PORTLAND, available at <https://www.portland.gov/fire/streetresponse/psr-faq>.

1 Summary also refers to the Portland Street Response program when describing current City
2 operations in parallel to the resulting increase in “street response services” should the Initiative
3 be approved.

4 6.

5 Blurring this line about what “street response services” already exist in the City and
6 what the Initiative seeks to achieve, whether intentionally or not, overtly misleads voters about
7 the provisions and major effect of the proposed Initiative. Worse, it threatens to undermine the
8 very fabric and efficacy of the Portland Street Response program that is built on trust with
9 community members historically targeted by police violence that Portland Street Response will
10 not respond to crisis calls “with sworn police officers.” To allow this misinformation to spread
11 via ballot title and the ensuing public discourse would damage “street response service” in
12 Portland, which appears contradictory to the Initiative’s own purported purpose. While it may
13 be politically advantageous for proponents of police expansion to couple a call for increased
14 law enforcement presence with phrasing that brings to mind the publicly popular and viable
15 Portland Street Response program, such wording renders the ballot title legally infirm as not
16 concise, unfair, and not conforming to the requirements of ORS 250.035.

17 7.

18 This Court is the sole recourse for the public electorate to correct the harmful and
19 misleading ballot title and place accurate information about the Initiative and its major effects
20 before the voters.

21 8.

22 This Petition is brought pursuant to ORS 250.296 and Section 2.04.070 of the Portland
City Code.

///

1 **PARTIES**

2 9.

3 Petitioner Jacqueline Yerby (“Petitioner”) is an Oregon elector who is registered to vote in
4 Multnomah County and who resides within the city limits of the City of Portland. Petitioner
5 Yerby is also the Director of Community Engagement at the ACLU of Oregon, and was the
6 Policy Advisor for Behavioral Health and Health Licensing for former Governor Kate Brown.
7 Petitioner Yerby is dissatisfied with the ballot title for Initiative PDX24OL-02 and seeks a
8 different ballot title.

9 10.

10 Respondent Robert Taylor (“Respondent Taylor”) is the City Attorney for the City of
11 Portland. Respondent Taylor prepared the ballot title for Initiative PDX 24OL-02.

12 **FACTS**

13 **A. Background on Portland Street Response, a No-Police Crisis Response Service**

14 11.

15 In Portland, the phrase “street response” has a specific meaning and refers to a specific
16 public service. In 2021, the City piloted a popular and successful program called Portland
17 Street Response. Initially launched in a single neighborhood in Lents, the Portland Street
18 Response program met with success and community approval, and consistently expanded to
19 now operate throughout the City at all hours, every day. Portland Street Response dispatches
20 unarmed mental health professionals, EMTs, and peer support specialists to assist people
21 experiencing mental and behavioral health emergencies in public. Upon information and
22 belief, most of the people working for Portland Street Response are not social workers.

///

12.

1
2 Portland Street Response very explicitly and intentionally operates without police. The
3 directive to exclude police from the Portland Street Response program was a conscious choice
4 by the City driven, in part, by the history of a pattern of unconstitutional violence from police
5 in response to people in mental health crises. In the early phases of the program, Mayor Ted
6 Wheeler said that “the core principle is if someone is in crisis on our streets, are we in fact
7 sending the appropriate people to deal with it? And right now, we’re predominantly sending
8 armed police officers, and they have said overwhelmingly, they don’t think they’re the right
9 people to respond to people in crisis.”²

13.

10 Portland Street Response is widely popular. In a Portland Statute University review of the
11 program, people satisfactorily rated their experience with the program at 4.6 of 5.³ Almost
12 12,000 people have signed a petition to preserve Portland Street Response because the program
13 has become a political target.⁴ Despite efforts to defund Portland Street Response, the federal
14 judge overseeing the Settlement Agreement between the City and USDOJ recently said that

15 ² SR Editorial Board, *In line with Street Roots’ campaign, Wheeler earmarks \$500,000 in contingency*
16 *funds for an alternative first response to crises on the streets*, STREET ROOTS (May 1, 2019), available
17 at [https://www.streetroots.org/news/2019/05/01/sr-editorial-mayor-proposes-funding-portland-street-](https://www.streetroots.org/news/2019/05/01/sr-editorial-mayor-proposes-funding-portland-street-response)
18 [response](https://www.streetroots.org/news/2019/05/01/sr-editorial-mayor-proposes-funding-portland-street-response).

19 ³ Greg Townley, PHD and Emily Leickley PHD, *Portland Street Response Year Two Evaluation*, PSU
20 HOMELESSNESS RESEARCH AND ACTION COLLABORATIVE (June 2023), available at
21 [https://www.pdx.edu/homelessness/sites/homelessness.web.wdt.pdx.edu/files/2023-](https://www.pdx.edu/homelessness/sites/homelessness.web.wdt.pdx.edu/files/2023-07/HRAC%20Portland%20Street%20Response%20Year%20Two%20Evaluation%20Report_FINAL%20FOR%20WEBSITE.pdf)
22 [07/HRAC%20Portland%20Street%20Response%20Year%20Two%20Evaluation%20Report_FINAL](https://www.pdx.edu/homelessness/sites/homelessness.web.wdt.pdx.edu/files/2023-07/HRAC%20Portland%20Street%20Response%20Year%20Two%20Evaluation%20Report_FINAL%20FOR%20WEBSITE.pdf)
[%20FOR%20WEBSITE.pdf](https://www.pdx.edu/homelessness/sites/homelessness.web.wdt.pdx.edu/files/2023-07/HRAC%20Portland%20Street%20Response%20Year%20Two%20Evaluation%20Report_FINAL%20FOR%20WEBSITE.pdf).

⁴ See, e.g., Alexis Zielinski, *Portland Street Response, despite successes, faces an uncertain future*,
OPB (June 27, 2023), available at [https://www.opb.org/article/2023/06/27/portland-street-response-](https://www.opb.org/article/2023/06/27/portland-street-response-citywide-one-year-later-future/)
[citywide-one-year-later-future/](https://www.opb.org/article/2023/06/27/portland-street-response-citywide-one-year-later-future/); Sophie Peel, *Amid Talk of Cuts, Carmen Rubio Proposes Funding*
Portland Street Response With Earned Interest on Climate Tax, WILLAMETTE WEEK (Feb. 6, 2024),
available at [https://www.wweek.com/news/city/2024/02/06/amid-talk-of-cuts-rubio-proposes-](https://www.wweek.com/news/city/2024/02/06/amid-talk-of-cuts-rubio-proposes-funding-portland-street-response-with-earned-interest-on-climate-tax/)
[funding-portland-street-response-with-earned-interest-on-climate-tax/](https://www.wweek.com/news/city/2024/02/06/amid-talk-of-cuts-rubio-proposes-funding-portland-street-response-with-earned-interest-on-climate-tax/).

1 Portland Street Response “is the best approach I’ve seen towards dealing with those crisis
2 intervention alternatives.”⁵

3 **B. Proposed Initiatives to Increase Portland Police in 2024**

4 14.

5 In 2024, three proposed ballot measures were filed with the City of Portland which
6 collectively seek to increase resources and funding for the Portland Police Bureau and expand
7 the degree of influence police exert over various City services. These proposed measures were
8 identified by the City as proposed initiative petitions PDX24OL-01, PDX24OL-02 (the
9 Initiative at issue here), and PDX24OL-03. All three proposed initiatives were filed by Chief
10 Petitioner William B. Aitchison.

11 15.

12 Upon information and belief, all three proposed initiatives were developed and are
13 being supported by William B. Aitchison and Anil Karia, who are attorneys for the Portland
14 Police Association.

15 16.

16 The initial proposed petition, PDX24OL-01, was deemed unconstitutional by the
17 Portland City Elections Officer because the petition’s proposed amendments were
18 administrative rather than legislative in nature and therefore violated Article IV of the Oregon
19 Constitution. Petitioner Aitchison withdrew PDX24OL-01 once it was ruled unconstitutional.

20 ///

21 ///

22 _____
⁵ Jonathan Levinson, *Portland, Department of Justice agree to independent monitor of police reforms*,
OPB (Nov. 3, 2023), available at
[https://www.opb.org/article/2023/11/03/portland-department-of-justice-agree-independent-monitor-
police-reforms/](https://www.opb.org/article/2023/11/03/portland-department-of-justice-agree-independent-monitor-police-reforms/).

17.

1
2 On February 7, 2024, pursuant to ORS 250.265 and Section 2.04.050 of the Portland
3 City Code, Petitioner Aitchison filed the second, related Initiative at issue, PDX24OL-02, with
4 the City entitled “Increases number of Portland Police patrol officers, enhances nonviolent
5 response.” A true and correct copy of Initiative PDX24OL-02, as published on the website
6 maintained by the City, is attached as Exhibit 1 and is incorporated by reference herein.

18.

7
8 Initiative PDX24OL-02 has six sections that propose to amend the Portland City
9 Charter to, among other effects: (1) require an increase in police patrol officers, (2) require the
10 creation of drug/alcohol treatment and detoxification centers run by the City, (3) require
11 increases in social services response that includes police, (4) change current uses of tax and
12 revenue sources to fund the preceding provisions, (5) require annual compliance reporting for
13 the preceding provisions, and (6) a severability clause.

19.

14 The Initiative’s proposed social services provision states in full: “Section 2-1103. Social
15 Services. City Council shall increase and maintain street response services that include trained
16 social workers working with sworn police officers and fire medical personnel to reduce violent
17 interactions and connect people in need with social services.” Exhibit 1.

20.

18 On February 14, 2024, pursuant to ORS 250.270(1) and Section 2.04.055 of the
19 Portland City Code, the City Elections Official completed the constitutional review of
20 prospective Initiative PDX24OL-02 and determined it preliminarily met the requirements of

1 Article IV of the Oregon Constitution, but that the petition “veer[s] towards administrative, and
2 not legislative.” A true and correct copy of the constitutional determination, as published on
3 the website maintained by the City, is attached as Exhibit 2 to this Petition and is incorporated
4 by reference herein.

5 21.

6 The City Elections Official forwarded Initiative PDX24OL-02 to City Attorney
7 Respondent Taylor for preparation of the ballot title.

8 22.

9 On February 23, 2024, pursuant to ORS 250.275 and Section 2.04.060 of the Portland
10 City Code, Respondent Taylor prepared the proposed ballot title for Initiative PDX24OL-02
11 and transmitted it to the City Auditor, who inscribed a date of receipt on the ballot title. A true
12 and correct copy of the ballot title indicating the notice and date of receipt, as published on the
13 website maintained by the City, is attached as Exhibit 3 to this Petition and is incorporated by
14 reference herein.

15 23.

16 This Petition is timely pursuant to ORS 250.296(1) and Section 2.04.055 of the Portland
17 City Code because it is filed no later than seven business days after the ballot title for Initiative
18 PDX24OL-02 was filed with the City Elections Officer.

19 **BALLOT TITLE INFIRMITIES**

20 24.

21 The components of the ballot title for Initiative PDX24OL-02 do not meet the legal
22 requirements of ORS 250.035.

///

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25.

1
2 The Caption prepared by Respondent Taylor for the ballot title for Initiative PDX24OL-
3 02 does not comply with the requirements of ORS 250.035(1) because it does not reasonably
4 identify the subject of the measure. Respondent Taylor’s caption incorrectly indicates that the
5 subject of Initiative PDX24OL-02 is to “increase[] police patrol officers, detoxification centers,
6 street response services.” This caption does not comply with ORS 250.035 because the caption
7 does not identify key aspects of the Initiative including the maintenance of unknown number of
8 sworn patrol officers, the embedding of police in street response to connect people with social
9 services, and funding implications of the Initiative. As described, “street response” is a
10 misleading phrase in the caption because it implies an increase in a non-police response when
11 the Initiative would effectuate the exact opposite; it would insert and increase the use of police
12 in so-called street response. The phrase “street response” also implies increase in mobile
13 mental and behavioral health emergency response via the service that already exists in Portland,
14 whereas the Initiative describes street response to be about connecting “people in need with
15 social services.”

26.

14 The Question prepared by Respondent Taylor for the ballot title for Initiative
15 PDX24OL-02 does not comply with the requirements of ORS 250.035(1) because it does not
16 plainly phrase the purpose of the measure. Respondent Taylor’s question incorrectly indicates
17 that the purpose of Initiative PDX24OL-02 is to “increase and maintain police officers in
18 patrol; create 24-hour drug/alcohol detoxification centers; increase street response services.”
19 For the same reasons that the Caption is infirm, the Question also fails. The Question does not
20 name, or at least obfuscates, the purposes of the Initiative. It likewise repeats the misleading
21 use of the phrase “street response services” and fails to inform voters about issues of

1 importance, including the required maintenance of an increase of an unknown number of sworn
2 patrol officers, the involvement of police in social services work, and the funding implications
3 of the Initiative.

4 27.

5 The Summary prepared by Respondent Taylor for the ballot title for Initiative
6 PDX24OL-02 does not comply with the requirements of ORS 250.035(1) because it does not
7 provide a concise and impartial statement summarizing the measure and its major effect. The
8 summary references the current Portland Street Response program and includes a parallel bullet
9 point that states an approved measure would “increase and maintain street response services...”
10 For reasons previously discussed, this description is misleading, inaccurate, and unfair. This is
11 exacerbated by the same bullet point’s use of a comma (“,”) where the Initiative text does not.
12 The summary is further misleading and confusing because of the lack of parallel structure and
13 language in some places. The summary also lacks clarity about what the county does versus
14 what the City would do upon the Initiative’s approval. Finally, the summary also fails to be
15 concise because it emphasizes unnecessary details in some places while leaving out important
16 information in others.

17 28.

18 For the reasons stated above, the ballot title for Initiative PDX24OL-02 filed with the
19 City Auditor does not comply with ORS 250.296(1) because it is insufficient, not concise
20 and/or unfair. Blurring the line between the police and street response services undermines the
21 trust and credibility that Portland Street Response has garnered with people experiencing
22 mental health crises and compromises Portland Street Response’s effectiveness and ability to
serve community members in need. The public has the right to have an independent and

1 informed choice about funding the police versus funding non-police emergency response
2 programs.

3 29.

4 This Court should certify a Caption for Initiative PDX24OL-02 that reads: Amends
5 Charter: Requires expanded police patrols, police social services involvement, detoxification
6 centers.

7 30.

8 This Court should certify a Question for Initiative PDX24OL-02 that reads: “Should
9 Portland maintain an increased number of police; involve police in social services; operate
10 detoxification facilities?”

11 31.

12 This Court should certify a Summary for Initiative PDX24OL-02 that reads:

13 Currently:

- 14 • The Police Chief has discretion to determine the number of patrol officers
- 15 • The County operates drug/alcohol treatment and detoxification centers. There
16 is no detoxification center in the City
- 17 • The County and City operate mobile response programs that involves social
18 service workers co-responding with police
- 19 • The City– through Portland Street Response – operates an emergency response
20 program that dispatches mental/behavioral health specialists to mental health
21 emergencies without involving the police
- 22 • Portland Street Response is funded by marijuana tax, general and other
revenues

///

1 If measure is approved, amended City Charter will require the Council to:

- 2 • Increase and maintain unspecified number of police officers providing patrol
- 3 services
- 4 • Create and maintain unspecified number of 24-hour drug/alcohol
- 5 detoxification drop-off and treatment centers.
- 6 • Increase and maintain co-response services that involve social workers
- 7 working with police and fire medical personnel separate from Portland Street
- 8 Response program
- 9 • Take marijuana tax, license, general and other revenue to fund expanded police
- 10 services, treatment centers, and co-response services that involve police
- 11 • Issue annual public report on compliance with above
- 12 • Severability clause included.

12 32.

13 As required by ORS 250.296(2), no later than 5:00 p.m. on Wednesday, March 6, 2024,
14 Petitioner will give written notice to the City Elections Officer that this Petition has been filed.

15 WHEREFORE, Petitioner prays for a judgment as follows:

- 16 1. Declaring the ballot title for Initiative PDX 2424OL-02 to be insufficient, not
- 17 concise, unfair, and not conforming to the requirements of ORS 250.035;
- 18 2. Certifying to the City Auditor a ballot title that conforms to the requirements of
- 19 ORS 250.035;
- 20 3. Awarding Petitioner her costs and disbursements; and

20 ///

4. Awarding any other relief the Court considers just and equitable.

DATED: March 5, 2024.

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF OREGON, INC.

By: /s/ Kelly Simon

Kelly Simon, OSB #154213

Alicia LeDuc Montgomery, OSB #173963

ACLU FOUNDATION OF OREGON

PO Box 40585

Portland, Oregon 97240

(503) 227-3186

ksimon@aclu-or.org

aleducmontgomery@aclu-or.org

Attorneys for Petitioner



AN ACT

BE IT ENACTED BY THE PEOPLE OF THE CITY OF PORTLAND

The City Charter of the City of Portland is amended as follows:

1. Amend Chapter 2 by adding a new Article 11 which shall read as follows:

Section 2-1101. Police Services. City Council shall increase and maintain the number of sworn Police Bureau officers in patrol services.

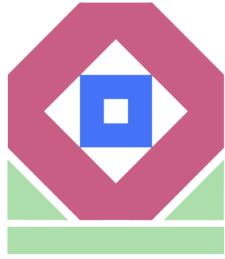
Section 2-1102. Treatment Centers. City Council shall create and maintain 24-hour drug/alcohol detoxification drop-off and treatment centers, and shall seek to partner with the State and/or other local governments in doing so.

Section 2-1103. Social Services. City Council shall increase and maintain street response services that include trained social workers working with sworn police officers and fire medical personnel to reduce violent interactions and connect people in need with social services.

Section 2-1104. Funding. Consistent with other Charter provisions regarding budgeting and expenditure of public funds, City Council should use cannabis/marijuana tax and licensing revenue, general fund revenue, and/or other revenue sources to fund such police services, treatment centers, and social services.

Section 2-1105. Public Reports. City Council shall issue an annual public report that identifies its compliance with this Section.

Section 2-1106. Severability. For the purpose of determining constitutionality, every section, subsection and subdivision thereof of this Section, at any level of subdivision, shall be evaluated separately. If any section, subsection or subdivision at any level is held invalid, the remaining sections, subsections and subdivisions shall not be affected and shall remain in full force and effect. The courts shall sever those sections, subsections and subdivisions necessary to render this Section consistent with the United States Constitution and with the Oregon Constitution. Each section, subsection and subdivision thereof, at any level of subdivision, shall be considered severable, individually or in any combination.



**Portland
City Auditor**
Elections



February 15, 2024

William B. Aitchison
1628 NW 32nd Ave.
Portland, OR 97210

Delivered Electronically

wiaitchison@gmail.com
anil@pslglawyers.com

**Notice of Determination
Constitutional Requirements Met**
Prospective Initiative Petition PDX24OL-02

Dear Chief Petitioner Aitchison:

On February 7, 2024, you filed a prospective initiative petition with the City Elections Office. As required by ORS 250.270(1) and City Code Section 2.04.055, I have determined that Prospective Initiative Petition ID PDX24OL-02, "Increases number of Portland Police patrol officers, enhances nonviolent response," meets the requirements of Article IV of the Oregon Constitution, section 1 (2)(d) and (5).

As you know, our Office determined that a related prospective petition that you filed on February 7, 2024, PDX24OL-01, "Strengthening Recruitment, Retention, Training, and Accountability for the Portland Police Bureau," did not meet the requirements of Article IV of the Oregon Constitution because certain sections of the prospective petition were administrative, and not legislative, in nature.

We find this petition to be a much closer call. In particular, Section 2-1101 (governing the number of patrol officers, and requiring what could be interpreted as a one-time increase in their numbers), and Section 2-1105 (requiring Council to issue an annual report, which is the type of activity that has historically been assigned to executive or administrative functions in the City), veer towards administrative, rather than legislative.

1221 SW 4th Avenue, Room 130
Portland, OR 97204
portland.gov/elections
elections@portlandoregon.gov
503-823-4022

EXHIBIT 2

Nonetheless, this Office construes elections laws liberally, and these provisions are not so clearly administrative as to result in the denial of this prospective petition.

Please note that this determination is a limited review of constitutional conformity and does not necessarily identify all potential constitutional difficulties that may preclude the proposed measure from proceeding.

Next Steps

On February 15, 2024, the City Elections Office will deliver your prospective petition to the City Attorney's Office and request preparation of a ballot title. Under state law, the City Attorney's Office will be required to deliver a ballot title to the City Elections Office within 5 business days, or by February 23, 2024. After we have received the ballot title, our Office will reach out to you regarding next steps and the ballot title process.

Challenge Rights

As provided in ORS 250.270(4), any elector dissatisfied with the current constitutionality determination may petition the circuit court of the judicial district in which the City is located for review within 7 business days of the City Attorney filing the ballot title with the City Elections Officer.

If you have any questions, please feel free to reach out to our Office.

Thank you,

A handwritten signature in black ink that reads "Louise Hansen". The signature is written in a cursive style with a large, looping initial "L".

Louise Hansen
City Elections Officer

PDX24OL-02

Ballot Title

CAPTION

Amends Charter: Increases police patrol officers, detoxification centers, street response services.

QUESTION

Should Portland increase and maintain police officers in patrol; create 24-hour drug/alcohol detoxification centers; increase street response services?

SUMMARY

Currently:

- The Police Chief has discretion to allocate police bureau resources, including work assignments like patrol duties for members of the police bureau
- County governments are the primary local authorities for behavioral health, which includes both mental health services and substance abuse services. Drug and alcohol treatment centers are available within the City, but not a detoxification drop-off center
- In addition to county programs, the City – through Portland Street Response – uses criteria to deploy qualified mental health providers via self-dispatch or in response to 911 or 311 calls

If measure is approved, amended City Charter will require Council to:

- Increase and maintain number of sworn police officers in patrol services
- Create and maintain 24-hour drug/alcohol detoxification drop-off and treatment centers
- Increase and maintain street response services, including social workers working with police and fire personnel to reduce violence and connect people with services
- Fund with marijuana tax, license, general and other revenue
- Issue annual public compliance report

Other provisions.



1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served a copy of the foregoing PETITION FOR REVIEW OF BALLOT
3 TITLE (“INITIATIVE PDX24OL-02”) on:

4 Robert Taylor
5 Maja Haium
6 Office of the City Attorney, City of Portland
7 1221 SW 4th Ave., Suite 430
8 Portland, OR 97204
9 Email: Robert.Taylor@portlandoregon.gov
10 Email: Maja.Haium@portlandoregon.gov

11 Respondent

12 by emailing a copy thereof to said attorneys at their last-known email
13 addresses as set forth above.

14 AMERICAN CIVIL LIBERTIES UNION
15 FOUNDATION OF OREGON, INC.

16 By: /s/ Kelly Simon

17 Kelly Simon, OSB #154213

18 Alicia LeDuc Montgomery, OSB #173963

19 Attorneys for Petitioner
20
21
22