

## REQUEST UNDER THE OREGON PUBLIC RECORDS LAW

November 18, 2022

Multnomah County, OR

**BY EMAIL:** [julie.sullivan-springhetti@multco.us](mailto:julie.sullivan-springhetti@multco.us)

To Whom It May Concern:

On behalf of Energy Policy Advocates, a non-profit public policy institute, pursuant to the Oregon Public Records Law, ORS 192.311, *et seq.*, I hereby request copies of all electronic correspondence and accompanying information (metadata and any attachments), sent to or from or which copies (including cc: and bcc:) i) Nadège Dubuisson, Environmental Toxics Program Specialist, ii) Jessica Guernsey, Deputy Director of Public Health, iii) Brendon Haggerty, interim program supervisor for Multnomah County Environmental Health, iv) Multnomah County Chair Deborah Kafoury, and/or v) Commissioner Lori Stegmann, dated from February 1, 2022 through November 18, 2022, inclusive, that is also to or from or copies:

one or more of i) [Ellen.rosenblum@gmail.com](mailto:Ellen.rosenblum@gmail.com) ii) [elliott.gall@pdx.edu](mailto:elliott.gall@pdx.edu), and/or iii) [nick.caleb@gmail.com](mailto:nick.caleb@gmail.com), and/or which

is to or from or copies any email address ending with i) @RMI.org, ii) @buildingdecarb.org, and/or iii) @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.

EPA is a non-profit public interest organization organized under the laws of Washington State, 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. As such, it does not seek these records for commercial purposes. Rather, EPA seeks these records to determine certain uses of taxpayer-funded resources by faculty including to what

extent they are used in the performance or pursuit of certain “global warming” related activism, combining political or policy advocacy with dedicated publicly funded resources.

To keep costs and copying to a minimum please provide copies of all responsive records in electronic and, as possible, native format. This also means there should be no need for printing paper copies whether for mailing or scanning, or for creating a disk for mailing.

With that said, in the interests of expediting the search and processing of this Request, EPA is willing to pay fees up \$100. Please provide an estimate of anticipated costs in the event that fees for processing this Request will exceed \$100 and the basis therefor.

EPA’s ability to obtain fee waivers is essential to this work. EPA 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. EPA ensures the public is made aware of its work and findings via media, its website [epadvocates.org](http://epadvocates.org). The public information obtained by EPA have been relied upon by established media outlets, including the Washington Times and Wall Street Journal editorial page.<sup>1</sup> Further, Energy Policy Advocates is itself a media organization, a designation the federal government has repeatedly acknowledged for the purposes of FOIA.<sup>2</sup>

Furthermore, as this matter involves a significant issue of public interest, please produce responsive records as they become available on a rolling basis but consistent with the law’s prescribed timelines.

We look forward to your response. If you have any questions, do not hesitate to contact me by email at [Schilling@allhookedup.com](mailto:Schilling@allhookedup.com).

Sincerely,  
Rob Schilling

A handwritten signature in black ink, appearing to read 'RS', with a long horizontal flourish extending to the right.

Executive Director  
Energy Policy Advocates

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<sup>1</sup> See, e.g., EPA In the News at <http://epadvocates.org/news/>; see also, e.g., Stuart Parker, “Conservative Group Says States’ Ozone Suit ‘Trojan Horse’ for GHG Limits,” Inside EPA, February 24, 2021, and [https://www.wsj.com/articles/bidens-backdoor-climate-plan-11616020338?mod=opinion\\_lead\\_pos1](https://www.wsj.com/articles/bidens-backdoor-climate-plan-11616020338?mod=opinion_lead_pos1).

<sup>2</sup> See, e.g., Securities & Exchange Commission Requests No. 21-00769-FOIA, No. 21-01234-FOIA, 22-00557-FOIA, 22-01573-FOIA, 22-02866-FOIA and 22-02867-FOIA; Department of the Interior Request No. DOI-OS-2021-003335.