

**PETITION PURSUANT TO ORS 192.450-470 FOR REVIEW OF DENIAL OF
RIGHT TO INSPECT PUBLIC RECORD**

March 2, 2015

I, Brian Stahl, the undersigned, request the District Attorney of Wasco County to determine whether or not the public body denied a public request by unreasonably delaying a response as provided for under ORS 192.440(2); and to order the Wasco County Court and its employees to produce electronic copies of the following records should Wasco County's response not be fully responsive as determined by the District Attorney:

1. Any and all communications, to include, but not be limited to, texts and email, from any device, whether owned by Wasco County or personally owned, or handwritten communications, to include, but not be limited to, letters, notes, memos, email, and text messages, to or from any of the Wasco County Commissioners, Tyler Stone, or Teri Thalhofer, from November 1, 2014, through December 17, 2014, wherein the additional following key words for search occur: "Teri," "Terrie," "Terri," "Terry," "Thalhofer," "health district," "public health," or "NCPHD."
2. Records reflecting all recipients of texts sent and received and copies of all texts between the Commissioners outside of the times previously identified (approximately 40 texts). To identify whether Mr. Hege's records reflect Pacific Standard Time and to provide the make and model number of each Commissioner's texting device if the Commissioners have deleted the texts from their phones.

With regard to request number 1 above, I asked to inspect these records formally beginning on January 9, 2015, (attached hereto as "Exhibit 1") with the request being either expanded upon or narrowed down on January 16, 2015, (attached hereto as "Exhibit 2,"

page 2) January 22, 2015, (attached hereto as "Exhibit 3") January 28, 2015, (attached hereto as "Exhibit 4") and again on January 30, 2015, (attached hereto as "Exhibit 5") via both email and first class mail to the following persons:

Tyler Stone, Scott Hege, Steve Kramer, Rod Runyan, and Kristen Campbell of Timmons Law, P.C.


Additionally, various emails went between the parties regarding these requests. Copies of three of the email threads are attached hereto as "Exhibit 6" and "Exhibit 7." We received a response from Wasco County to the first request on January 21, 2015.

With regard to request number 2 above, I asked for those records on February 2, 2015, via an email, attached hereto as "Exhibit 8." We received responsive records on February 10, 2015.

Attached as "Exhibit 9" is a CD of all responses from Wasco County.

I hereby request that you review the documents we have received and determine whether the records produced were fully responsive to my requests.

I also request that the District Attorney review whether the fees charged by the County, as set forth in their letter of February 4, 2015, attached hereto as "Exhibit 10," was a reasonable fee under the provisions of ORS 192.440(4).



Brian Stahl



THOMAS C. PEACHEY, P.C.

ATTORNEYS AT LAW

401 EAST 3RD STREET, SUITE 105

P.O. BOX 2190

THOMAS C. PEACHEY

THE DALLES, OR 97058

ANDREW J. MYERS

541-296-6375

PATRICIA KUEHNL - LEGAL ASSISTANT
PAMELA M. RIISE - LEGAL ASSISTANT
VERONICA WILCOX - LEGAL ASSISTANT

FAX 1-877-625-4324
WWW.THEDALLES-LAW.COM

January 9, 2015

Tyler Stone
Administrative Officer
Wasco County Administrative Services
511 Washington Street, Suite 101
The Dalles, OR 97058

**Via email: TylerS@co.wasco.or.us
and 1st Class Mail**

Re: Public Records Request Pursuant to ORS 192.440

Dear Mr. Stone:

This office represents Brian Stahl of The Dalles, Wasco County, Oregon. Recent articles in The Dalles Chronicle concerning actions of the County Commissioners which include, among others, the efforts of Wasco County to withdraw from the North Central Public Health District have caused him significant concern over the processes utilized by the County Commissioners.

It is his understanding that Wasco County contributes over \$380K to this public health agency to support services for Wasco County residents. By withdrawing from the Health District, Wasco County will need to create a method of providing many of these services. As a long time member of public government boards in Wasco County, Mr. Stahl knows that there is obviously a significant cost analysis that must have been done before such a decision could be made. However, the public record is devoid of any such analysis or discussion among the Commissioners on that issue.

As a result, I am making a request of Wasco County to provide to me public records under the auspices of ORS 192.440. Those records include the following:

1) All agreements between Wasco County and others related to the North Central Public Health District, including, but not limited to, Intergovernmental Agreements from 2008 to the present;

2) All communications, including, but not limited to, email to or from Wasco County Commissioners that contain the phrase, "public health" between November 1, 2014 through December 17, 2014.

If any of these documents are maintained in an electronic form, it is requested that they be provided to me only in that form.

You are aware that it is the policy of public government in the State of Oregon that an informed public be aware of the deliberations and decisions of governing bodies and the information upon which such decisions were made. It is the intent of the relevant statutes that decisions of governing bodies be arrived at openly. The actions that have been taken by the Wasco County Commissioners appear to disregard these fundamental elements of our laws. Such actions are

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Tyler Stone
January 9, 2015
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voidable under the provisions of ORS 192.680. This statute requires that action, if any, be taken within 60 days from a decision that violates the public meeting laws and as a result, your cooperation in providing the requested information by Friday, January 16, 2015, will be expected and appreciated.

Very truly yours,

Thomas C. Peachey

cc: client
Scott Hege (via email: ScottH@co.wasco.or.us and mail)
Steve Kramer (via email: SteveK@co.wasco.or.us and mail)
Rod Runyon (via email: RodR@co.wasco.or.us and mail)
Bradley V. Timmons (via email: brad@timmons-law.com and mail)

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Pam Riise <priise@thedalles-law.com>

Fwd: Public Records Request dated January 9, 2015

1 message

Tom Peachey <tpeachey@thedalles-law.com>
To: Pam Riise <priise@thedalles-law.com>

Mon, Jan 19, 2015 at 11:25 AM

THOMAS C. PEACHEY, P.C.401 E. 3rd Street, Suite 105 / P.O. Box 2190

The Dalles, OR 97058

Phone: 541.296.6375 / Fax: 1.877.625.4324

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----- Forwarded message -----

From: **Kristen Campbell** <kristen@timmonslaw.com>
Date: Fri, Jan 16, 2015 at 1:47 PM
Subject: Re: Public Records Request dated January 9, 2015
To: Tom Peachey <tpeachey@thedalles-law.com>

I think it is a matter of IT's prioritizing, which has been addressed. Thank you for your patience. Stay tuned.
Kristen

Sent from my iPhone

On Jan 16, 2015, at 1:40 PM, Tom Peachey <tpeachey@thedalles-law.com> wrote:

Kristen: Thank you for the response. My tech people indicate the email is a simple matter that could be obtained in a few minutes. I am going to be reasonable regarding legitimate time to comply. Hopefully we can speak on Tuesday. Tom Peachey

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On Fri, Jan 16, 2015 at 12:47 PM, Kristen Campbell <kristen@timmonslaw.com> wrote:

Update:

This request has been with the IT Department. Tyler has re-emphasized this as a priority to them. I will advise you as soon as I hear the status as of today. In the meantime, be assured that it is in progress.

Thanks.

Kristen

Sent from my iPhone

On Jan 16, 2015, at 10:08 AM, Tom Peachey <tpeachey@thedalles-law.com> wrote:

Kristen: Will I be receiving any of the responsive documents today? I would also like to expand my texting requests to all texts between the identified parties occurring during meetings of the Board of Commissioners during the specified time frame. These texts need not contain the phrase, "public health". If I do not have the communication in an electronic format by Tuesday, January 20, 2015 I will seek the assistance of the Circuit Court. If there is any way that I can facilitate this request please advise. Tom Peachey

THOMAS C. PEACHEY, P.C.

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----- Forwarded message -----

From: **Tom Peachey** <tpeachey@thedalles-law.com>

Date: Wed, Jan 14, 2015 at 4:36 PM

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Subject: Re: Public Records Request dated January 9, 2015
To: Kristen Campbell <kristen@timmonsllaw.com>

Kristen: It will be my pleasure. Do you expect that we will be receiving the communication documents this week? I understand from my technical people that this requests can be accomplished with limited effort. We are still considering a revision of our request relating to agreements. Tom Peachey

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On Wed, Jan 14, 2015 at 4:01 PM, Kristen Campbell <kristen@timmonsllaw.com> wrote:

Tom: Thank you for the welcome. It will be nice to put a face to your name sometime soon! In the meantime, please keep me posted on your request.
Kristen

From: Tom Peachey [mailto:tpeachey@thedalles-law.com]
Sent: Tuesday, January 13, 2015 3:27 PM
To: Kristen Campbell
Subject: Re: Public Records Request dated January 9, 2015

Kristen: Welcome to The Dalles legal community. I am certain I can pare this request. The communication is the primary concern under the time restraints. I will get back to you. Please don't generate a response on the requested agreements until further notice, Tom Peachey

THOMAS C. PEACHEY, P.C.

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On Tue, Jan 13, 2015 at 3:18 PM, Kristen Campbell <kristen@timmonsllaw.com> wrote:

Dear Mr. Peachey,

Please see the attached response to your January 9, 2015 public records request to Wasco County.

Should you have any questions, please feel free to contact me at your convenience.

Kristen

Kristen A. Campbell, Attorney

TIMMONS LAW PC

PO Box 2350 <image001.gif> The Dalles, OR 97058

Crates Building 3591 Klindt Drive, Suite 220 <image001.gif> 541.296.9900 <image001.gif>
Fax 541.296.9904 <image001.gif> kristen@timmonsllaw.com

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1/20/2015

Tom Peachey Mail - Fwd: Public Records Request dated January 9, 2015

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PAMELA M. RIISE - LEGAL ASSISTANT
VERONICA WILCOX - LEGAL ASSISTANT

FAX 1-877-625-4324

WWW.THEDALLES-LAW.COM

January 22, 2015

Tyler Stone
Administrative Officer
Wasco County Administrative Services
511 Washington Street, Suite 101
The Dalles, OR 97058

Via email: TylerS@co.wasco.or.us
and 1st Class Mail

Re: Public Records Request Pursuant to ORS 192.440

Dear Mr. Stone:

As you are aware, on January 9, 2015, I made my initial request to Wasco County to provide to me public records under the auspices of ORS 192.440. The initial request was then reviewed by the county and modified by me with regard to the scope of agreements requested between Wasco County and North Central Public Health District. By email to Kristen Campbell on January 16, 2015, I also revised my initial request for communications to include "all texts between the identified parties occurring during meetings of the Board of Commissioners during the specified time frame ..." and that the texts needn't contain the phrase, "public health."

At this time, I am making a further supplemental request for communications as follows:

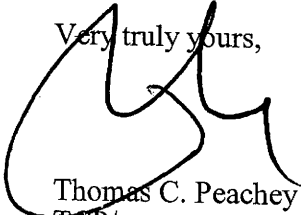
1. For any and all communications from any device, whether owned by Wasco County or personally owned, or handwritten communications, to include, but not be limited to, letters, notes, memos, email, and text messages to or from any of the Wasco County Commissioners, Tyler Stone, or Teri Thalhofer, between November 1, 2014, through December 17, 2014, wherein the additional following key words for search occur: "Teri," "Terrie," "Terri," "Terry," "Thalhofer," "district," and "NCPHD."
2. Please provide all cell phone billing records for text and data charges for your and the commissioners' phones. Records shall include accounts both for cell phones owned by Wasco County and for cell phones personally owned. Records must cover all days of public meetings between November 1, 2014, through December 17, 2014. This should disclose all texts sent from your and the commissioners' cell phones during public meetings. Please also provide any and all documents identifying the numbers used during those meetings and reflected in said records as to whom they belong.

If records that have been provided already contain some of this information, there is no need to duplicate production of those records.

Tyler Stone
January 22, 2015
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Finally, please find enclosed herewith our check in the amount of \$25.00, which we understand is the amount charged by Wasco County for our prior search.

Very truly yours,



Thomas C. Peachey
TCP/pr

Enclosure (only with mail)

cc: clients
Scott Hege (via email only: ScottH@co.wasco.or.us)
Steve Kramer (via email only: SteveK@co.wasco.or.us)
Rod Runyon (via email only: RodR@co.wasco.or.us)
Kristen Campbell (via email only: Kristen@timmons-law.com)



Pam Riise <priise@thedalles-law.com>

Re: January 22 Records Request

1 message

Tom Peachey <tpeachey@thedalles-law.com>

Wed, Jan 28, 2015 at 10:04 AM

To: Kristen Campbell <kristen@timmonslaw.com>

Bcc: priise@thedalles-law.com

Kriste: Thank you for your inquiry. I will check with my IT consultant but I would think "health District" may be more appropriate. I also understand that we are looking for communication between the Commission members and Mr. Stone only that contain the keywords but I will confirm that matter. The simple request here is the cell phone record for the time periods stated. I need those by Friday. Are you able to confirm or deny that the commission members were texting each other during public meetings? Tom Peachey

THOMAS C. PEACHEY, P.C.

401 E. 3rd Street, Suite 105 / P.O. Box 2190

The Dalles, OR 97058

Phone: 541.296.6375 / Fax: 1.877.625.4324

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On Wed, Jan 28, 2015 at 9:01 AM, Kristen Campbell <kristen@timmonslaw.com> wrote:

Tom,

The County IT Department supplied the records using the parameters you requested.

The term "District" returned voluminous e-mails: thousands of pages.

Attached are a sample of 10 or so among hundreds, if not more.

Every bulk e-mail, containing the word District is responsive:

School District

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Mid-Columbia Developmental District

District Manager

Recreation District

Also, our IT Department cannot refine this to extract duplicate records within this search or from the last search.

Are you able to help me refine this? If not, I need an extension.

This is not a County delay in providing the documents.

This is solely my ability to sift through thousands of pages of e-mails and then provide you with potentially thousands of pages those similar to the attached.

Phone/text records will be ready as promised.

Please let me know your thoughts.

Thank you for your consideration.

Kristen

Kristen A. Campbell, *Attorney*

TIMMONS LAW PC

PO Box 2350 ■ The Dalles, OR 97058

Crates Building 3591 Klindt Drive, Suite 220 ■ 541.296.9900 ■ Fax 541.296.9904 ■ kristen@timmonslaw.com

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THOMAS C. PEACHEY

ANDREW J. MYERS

PATRICIA KUEHNL - LEGAL ASSISTANT
PAMELA M. RIISE - LEGAL ASSISTANT
VERONICA WILCOX - LEGAL ASSISTANT

January 30, 2015

Kristen Campbell
Timmons Law P.C.
P.O. Box 2350
The Dalles, OR 97058

**VIA EMAIL: kristen@timmonslaw.com
and First Class Mail**

Re: Public Records Request Pursuant to ORS 192.440

Dear Ms. Campbell:

By email dated January 28, 2015, you asked that I restate our request for additional public records. I believe the request is basically as follows, some of which has previously been received and all of which is to be provided in electronic form:

1. Any and all communications, including, but not limited to, email or texts to or from Wasco County Commissioners or Tyler Stone, that contain the phrase, "public health" from November 1, 2014, through December 17, 2014.
2. Any and all communications, to include, but not be limited to, texts and email, made between the identified parties from one hour before every public meeting of the Board of Commissioners through one hour after the meeting ends, from November 1, 2014, through December 17, 2014.
3. Any and all communications, to include, but not be limited to, texts and email, from any device, whether owned by Wasco County or personally owned, or handwritten communications, to include, but not be limited to, letters, notes, memos, email, and text messages, to or from any of the Wasco County Commissioners, Tyler Stone, or Teri Thalhofer, from November 1, 2014, through December 17, 2014, wherein the additional following key words for search occur: "Teri," "Terrie," "Terri," "Terry," "Thalhofer," "health district," or "NCPHD."
4. Please provide all cell phone billing records for text and data charges for Tyler Stone's and the commissioners' phones. Records shall include accounts both for cell phones owned by Wasco County and for cell phones personally owned. Records must cover all days of public meetings from November 1, 2014, through December 17, 2014. This should disclose whether data was sent or received by Mr. Stone's and/or the commissioners' cell phones during public meetings. Please also provide any and all documents identifying the numbers used to which, or from which, data text was either sent or received during those meetings. Please include any information in said requested records as to whom the numbers belong.

To reiterate, the request for phone records would include, but not be limited to, all telephones which the:

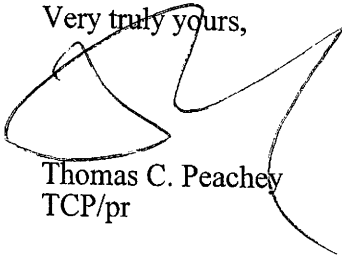
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Kristen Campbell
January 29, 2015
Page 2

- County provided
- County provided a stipend
- County was reimbursed for calls made

Should you have any questions or concerns, please contact me.

Very truly yours,



Thomas C. Peachey
TCP/pr

cc: clients
Scott Hege (via email only: ScottH@co.wasco.or.us)
Steve Kramer (via email only: SteveK@co.wasco.or.us)
Rod Runyon (via email only: RodR@co.wasco.or.us)
Tyler Stone (via email only: Tylers@co.wasco.or.us)



Pam Riise <priise@thedalles-law.com>

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1 message

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To: Pam Riise <priise@thedalles-law.com>

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To: Tom Peachey <tpeachey@thedalles-law.com>

I think it is a matter of IT's prioritizing, which has been addressed. Thank you for your patience. Stay tuned.
Kristen

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Kristen: Thank you for the response. My tech people indicate the email is a simple matter that could be obtained in a few minutes. I am going to be reasonable regarding legitimate time to comply. Hopefully we can speak on Tuesday. Tom Peachey

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Kristen

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----- Forwarded message -----

From: **Tom Peachey** <tpeachey@thedalles-law.com>
Date: Wed, Jan 14, 2015 at 4:36 PM

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Subject: Re: Public Records Request dated January 9, 2015
To: Kristen Campbell <kristen@timmonsllaw.com>

Kristen: It will be my pleasure. Do you expect that we will be receiving the communication documents this week? I understand from my technical people that this requests can be accomplished with limited effort. We are still considering a revision of our request relating to agreements. Tom Peachey

THOMAS C. PEACHEY, P.C.

401 E. 3rd Street, Suite 105 / P.O. Box 2190

The Dalles, OR 97058

Phone: 541.296.6375 / Fax: 1.877.625.4324

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On Wed, Jan 14, 2015 at 4:01 PM, Kristen Campbell <kristen@timmonsllaw.com> wrote:

Tom: Thank you for the welcome. It will be nice to put a face to your name sometime soon! In the meantime, please keep me posted on your request.
Kristen

From: Tom Peachey [mailto:tpeachey@thedalles-law.com]
Sent: Tuesday, January 13, 2015 3:27 PM
To: Kristen Campbell
Subject: Re: Public Records Request dated January 9, 2015

Kristen: Welcome to The Dalles legal community. I am certain I can pare this request. The communication is the primary concern under the time restraints. I will get back to you. Please don't generate a response on the requested agreements until further notice, Tom Peachey

THOMAS C. PEACHEY, P.C.

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On Tue, Jan 13, 2015 at 3:18 PM, Kristen Campbell <kristen@timmonsllaw.com> wrote:

Dear Mr. Peachey,

Please see the attached response to your January 9, 2015 public records request to Wasco County.

Should you have any questions, please feel free to contact me at your convenience.

Kristen

Kristen A. Campbell, Attorney

TIMMONS LAW PC

PO Box 2350 <image001.gif> The Dalles, OR 97058

Crates Building 3591 Klindt Drive, Suite 220 <image001.gif> 541.296.9900 <image001.gif>
Fax 541.296.9904 <image001.gif> kristen@timmonsllaw.com

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Pam Riise <priise@thedalles-law.com>

Fwd: January 22 Records Request

1 message

Tom Peachey <tpeachey@thedalles-law.com>
To: Pam Riise <priise@thedalles-law.com>

Wed, Jan 28, 2015 at 11:43 AM

Would you articulate the entire request at this point with the modifications?

THOMAS C. PEACHEY, P.C.

401 E. 3rd Street, Suite 105 / P.O. Box 2190

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Phone: 541.296.6375 / Fax: 1.877.625.4324

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----- Forwarded message -----
From: **Kristen Campbell** <kristen@timmonsllaw.com>
Date: Wed, Jan 28, 2015 at 11:12 AM
Subject: RE: January 22 Records Request
To: Tom Peachey <tpeachey@thedalles-law.com>

Hello,

I will forward the revised request to IT. Could you restate the request only to ensure I relay it with 100% accuracy to get this on our fast track?

I do want to caution that the IT Director is out of the office for the remainder of the week.

I believe he is accessible in evenings, so can at least give me a response time frame.

Kristen

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From: Tom Peachey [mailto:tpeachey@thedalles-law.com]
Sent: Wednesday, January 28, 2015 11:01 AM
To: Kristen Campbell
Subject: Re: January 22 Records Request

Kristen: Thank you, that is helpful. We have witnesses that have observed apparent texting activity but I am sure the requested records will show that those texts, if any, went elsewhere. I have confirmed that the appropriate search term should be "health district". Does that significantly narrow the search? Once again, those phone records for all requested phones would be helpful too. If, for example, Duane Francis or Kathy Schwartz were being communicated with during a meeting there is a potential for violating public meeting laws. Tom Peachey

THOMAS C. PEACHEY, P.C.

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On Wed, Jan 28, 2015 at 10:42 AM, Kristen Campbell <kristen@timmonslaw.com> wrote:

Hello Tom,

I have carefully reviewed all phone and text records. I can unequivocally deny that the Commissioners or Tyler were texting each other during the meetings.

I will hold off on the e-mails for the time being until you are able to clarify the search parameters. At that time, I will provide you a revised acknowledgement and estimates.

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I appreciate your cooperation. As always, please let me know how I can help.

Kristen

From: Tom Peachey [mailto:tpeachey@thedalles-law.com]

Sent: Wednesday, January 28, 2015 10:04 AM

To: Kristen Campbell

Subject: Re: January 22 Records Request

Kriste: Thank you for your inquiry. I will check with my IT consultant but I would think "health District" may be more appropriate. I also understand that we are looking for communication between the Commission members and Mr. Stone only that contain the keywords but I will confirm that matter. The simple request here is the cell phone record for the time periods stated. I need those by Friday. Are you able to confirm or deny that the commission members were texting each other during public meetings? Tom Peachey

THOMAS C. PEACHEY, P.C.

401 E. 3rd Street, Suite 105 / P.O. Box 2190

The Dalles, OR 97058

Phone: 541.296.6375 / Fax: 1.877.625.4324

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On Wed, Jan 28, 2015 at 9:01 AM, Kristen Campbell <kristen@timmonslaw.com> wrote:

Tom,

The County IT Department supplied the records using the parameters you requested.

The term "District" returned voluminous e-mails: thousands of pages.

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Attached are a sample of 10 or so among hundreds, if not more.

Every bulk e-mail, containing the word District is responsive:

School District

Mid-Columbia Developmental District

District Manager

Recreation District

Also, our IT Department cannot refine this to extract duplicate records within this search or from the last search.

Are you able to help me refine this? If not, I need an extension.

This is not a County delay in providing the documents.

This is solely my ability to sift through thousands of pages of e-mails and then provide you with potentially thousands of pages those similar to the attached.

Phone/text records will be ready as promised.

Please let me know your thoughts.

Thank you for your consideration.

Kristen

Kristen A. Campbell, Attorney

TIMMONS LAW PC

PO Box 2350 ■ The Dalles, OR 97058

Crates Building 3591 Klindt Drive, Suite 220 ■ 541.296.9900 ■ Fax 541.296.9904 ■ kristen@timmonsllaw.com

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Pam Riise <priise@thedalles-law.com>

Wasco County Public Record Request

1 message

Tom Peachey <tpeachey@thedalles-law.com>
To: Kristen Campbell <kristen@timmonslaw.com>
Bcc: priise@thedalles-law.com

Mon, Feb 2, 2015 at 3:34 PM

Dear Kristen: Thank you for the opportunity to review the requested phone records today in your office. This will confirm that I had opportunity to review redacted and unredacted phone and text records for the identified individuals. I have requested you to address a few issues as follows:

- 1) Do the records reflect all recipients of texts sent and received?
- 2) Do Mr. Hege's records reflect Pacific Standard time?
- 3) These records reflect approximately 40 texts between the Commissioners outside of the times identified. I am requesting copies of those texts. If the Commissioners have deleted the texts from their phones please indicate and indicate the make and model number of each Commissioner's texting device.

I understand that even deleted texts can be retrieved. I am willing to have my expert attempt retrieval of those texts message if requested. Tom Peachey

THOMAS C. PEACHEY, P.C.401 E. 3rd Street, Suite 105 / P.O. Box 2190


The Dalles, OR 97058

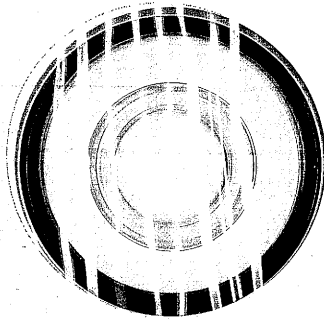
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 **PEACHEY &
MYERS, PC.**
ATTORNEYS AT LAW



WASCO COUNTY RECORDS
Produced by County on 01/21/2015 and 02/10/2015
pursuant to Public Records Requests
filed by Peachey & Myers, PC as Bates no
WC-00001-00371

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TIMMONS LAW PC

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Bradley V. Timmons*
Antoine J. Tissot*
Karen A. Feil
Staci L. McCarthy**
**also admitted in Washington*
***also admitted in California*

February 4, 2015

Thomas C. Peachey
PO Box 2190
The Dalles, OR 97058

Via email: tpeachey@thedalles-law.com
and 1st Class Mail

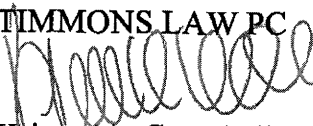
Re: Public Records Request dated January 31, 2015-ORS 192.440

Dear Mr. Peachey:

In accordance with ORS 192.440(2), please be advised that Wasco County (the "County") is in receipt of your January 31, 2015 Public Records Request related to the North Central Public Health District (the "District").

This also confirms that the County possesses, or is the custodian of, some of the requested public records. The County estimates that it will require five (5) business days from the date you confirm this request and fee estimate before the public records will be provided. Then, I will need two to three (2-3) business days for review. The estimated fee for making the records available is \$500.00-\$600.00, inclusive of at least three hours of electronic information services (the County's search mechanism does not sort by "time" so this function will need to be performed manually) and a reasonable allotment of time for Mr. Stone and the Commissioners to revisit their phone records/phone companies and for my services to review the response for any exemptions.

Sincerely,

TIMMONS LAW PC

Kristen A. Campbell
kristen@timmonslaw.com

cc: Tyler Stone

Physical Address
Crates Building
3591 Klindt Drive, Suite 220
The Dalles, Oregon 97058

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