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BY FIRST CLASS MAIL AND E-MAIL (records@pps.net)

Records Management
Attn: Public Records Request
Portland Public Schools
501 N. Dixon Street
Portland, OR 97227

Re: *Public Records Act Request*

Dear Sir or Madam,

Pursuant to the Oregon Public Records Act, I am requesting the opportunity for inspection and examination of the records listed below, or copies thereof, on behalf of the Multnomah County Republican Party and individual parents with children attending the Portland Public Schools (PPS).

For purposes of this request, the term "Second Amendment Subjects" refers to the following subjects:

- (a) The National School Walkout held March 14, 2018;
- (b) Any subsequent protests or walkouts in Portland, Oregon relating to gun control subsequent thereto, including but not limited to protests on March 24th and scheduled for April 20, 2018;
- (c) Initiative Petition Nos. 42 or 43;¹
- (d) Portland School Board Resolution No. 5606 ("Resolution on Gun Violence in our Schools"); and/or
- (e) Any existing or proposed federal, state or local legislation concerning the manufacture, possession or use of firearms.

¹ Petitions filed with the Oregon Secretary of State on March 19, 2018 and March 22, 2018.

The first group of documents sought is limited, to minimize the burden of response, to documents generated or received within the following two Portland Public Schools: Mt. Tabor Middle School and Franklin High School.

1. All documents referring or relating to the meetings that school principals have had with their staff and student leaders regarding the National School Walkout on March 14, 2018.
2. All written communications to or from parents concerning the National School Walkout.
3. All written materials generated in connection with the National School Walkout.
4. All documents concerning the use of “school support and counseling specialists” in connection with the National School Walkout;
5. All documents concerning the use of school supplies in connection with the National School Walkout
6. All documents referring or relating to any representative of PPS forbidding parents from photographing or video-recording protests concerning the Second Amendment Subjects in which students participate.
7. All documents related to any of the Second Amendment Subjects and an attempt on the day before the National School Walkout by a student to bring a gun into Franklin

The second group of requests calls for the production of documents generated or received at the headquarters of the Portland Public Schools, except for Request Nos. 10-12, which is a system-wide request for Electronic Communications.

8. All documents referring or relating to any costs borne by PPS in connection with any Second Amendment Subject, including but not limited to:
 - (a) Costs of educational materials consumed in any protest activities;
 - (b) Costs of any third-party services, including but not limited to security services utilized in connection with any protests;
 - (c) All records relating to staff time utilized by Brian Robertson, PPS Multimedia Services, and other PPS personnel relating to the creation and editing of the video posted at <https://youtu.be/wo0fizLqi1w> and any other videos produced by PPS relating to Second Amendment Subjects.
9. All communications between any representative of PPS and the Portland Police Bureau concerning the Second Amendment Subjects;

10. All Electronic Communications in the Portland Public Schools system to or from any e-mail address in any of the following domains: “womansmarch.com”; “ceasefireoregon.org”; “marchforourlives.com”; “momsdemandaction.org”; “everytown.org”; “responsibleownership.org”; and/or “oregonallianceforgunsafety.org,” or posted to any social media accounts maintained by any of these organizations.

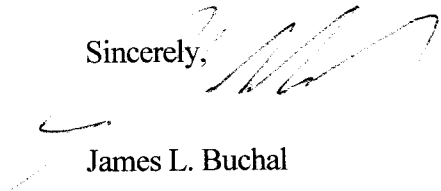
11. All Electronic Communications in the Portland Public Schools system to or from any of the following individuals (and/or, in the case of public officials, any members of their staffs), which relate to Second Amendment Subjects: Governor Kate Brown; Mayor Ted Wheeler, Portland Association of Teachers President Suzanne Cohen; Julie Esparza Brown, Director, PPS Board of Education; Guadalupe Guerrero; Superintendent; City Commissioner Nick Fish; State Senator Lew Frederick; Chief Petitioners Walter John Knutson, Michael Z. Cahana and/or Alcena E. Boozer; and non-PPS students Alyssa Diaz (PSU) and/or Tyler White (De La Salle Catholic HS).

12. All Electronic Communications in the Portland Public Schools system containing any of the following text strings: “Second Amendment,” “gun control,” “assault rifle,” “semiautomatic,” “semi-automatic,” “IP42,” “Initiative Petition 42,” “IP43,” “Initiative Petition 43,” “OAR 584-020-0035,” “ORS 294.100,” and “ORS 260.432”.

To minimize the burden of this request, the relevant time period is February 1, 2018 to the present. For purposes of these requests “Electronic Communications” refers not only to e-mails, but also to materials transmitted utilizing SchoolMessenger through voice, SMS text, email, and social media.

This request should be construed as a continuing request calling for responsive documents up to and including the date records are finally produced. In the event that you need to establish a cutoff date a short interval prior to the response, please identify that date in the response to avoid future, overlapping requests.

Sincerely,



James L. Buchal