August 24, 2018

Oregon State Legislature
900 Court Street NE
Salem, OR 97301

Re:  Commissioner Avakian v. Legislative Assembly, et al
     Case No. STEMSH180801-11138
     Legislative Assembly’s Response to Commissioner Brad Avakian’s BOLI Complaint

To the Members and Staff of the Legislative Assembly:

Barran Liebman has been retained to represent the Legislature in connection with an administrative complaint against the Legislature made by the Commissioner of the Bureau of Labor and Industries (BOLI), Brad Avakian. We are managing all communication with BOLI related to the complaint. BOLI is aware of our representation, and should be directing any correspondence directly to our attention. If you receive any correspondence directly from BOLI, please contact us immediately.

The Legislature remains committed to transparency and will provide a thorough and detailed response to the complaint on August 31. In parallel, the Legislature will protect the privacy of those individuals who disclosed personal information relating to harassment issues in the Capitol.

Today our firm filed objections to subpoenas for documents being sought by BOLI because the information seeks highly confidential personally identifiable information about individuals who came forward in harassment complaints and asked to remain anonymous, and because the subpoenas are overbroad. Filing today’s objections is a standard part of the administrative process under BOLI’s rules.

Thank you for entrusting us with this matter, and please do not hesitate to contact me if you have any questions or concerns.

Very truly yours,

BARRAN LIEBMAN LLP

Edwin A. Hamden

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