

FROM Robert Samuel White
TO [Program Manager]
CC Director Lisa Sumption; Governor Kotek; Interim Director Stefanie Coons
DATE February 3, 2026, 11:54 AM PT
SUBJECT **Notice of Ongoing Constitutional Violation**
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[Program Manager],

This is my final communication to you.

On March 27, 2025, you issued a permanent, system-wide expulsion from Oregon State Parks volunteer programs and explicitly stated in writing that the basis for that expulsion was my public speech about abuse by OPRD staff.

You did not allege misconduct.

You did not allege safety concerns.

You did not allege failure of duty.

You documented retaliation for protected speech, under color of law.

That violation has now continued for 314 days.

Your continued silence does not insulate you. It establishes notice, deliberate indifference, and ongoing harm.

Each additional day the expulsion remains in effect compounds the violation.

Your action has foreclosed my ability to participate in state volunteer programs and materially interferes with my ability to pursue employment or service with Oregon state agencies without explaining a retaliatory expulsion that you authored.

You have the ability to undo this. You have chosen not to.

If the expulsion is not rescinded, I will file a civil rights action pursuant to 42 U.S.C. §1983. I will not

represent myself. I will seek full relief available under law, including damages, fees, and injunctive remedies. This matter will not be resolved informally once filed.

This is not a request.

It is notice.

The next communication you receive from me will be through counsel or service of process.

Robert Samuel White

oprdivolunteerabuse.org