

FROM Robert Samuel White
TO Director Lisa Sumption
CC Deputy Director JR Collier; Interim Director Stefanie Coons; OPRD Commissioners;
Governor Kotek; [Kotek Campaign Chair]
DATE March 4, 2026, 7:38 AM PT
SUBJECT **42 U.S.C. § 1983 — Director Lisa Sumption**
DOCUMENT 01KJWMK70R1GJJ7NYFN6EZCFER

Director Sumption,

I am writing to notify you personally that I intend to file a civil rights claim under 42 U.S.C. § 1983 naming you as an individual defendant.

This notice is not directed at the institution. It is directed at you.

On August 25, 2025 I sent you a comprehensive documented account of coordinated abuse, the intimidation of a volunteer on public land, retaliatory dismissal, and permanent expulsion from public lands without due process. Your response arrived within twelve hours. You told me you would ensure my concerns were reviewed through appropriate channels within the department.

Nothing followed.

In December 2025 I sent you a second letter. You responded by converting documented institutional misconduct into therapeutic language. "Deeply painful." "Lasting impact." "I hear the frustration and hurt in your words." You received recordings, timestamps, and written evidence of the use of state resources to intimidate a gay volunteer on public land while he was isolated and alone — and you responded as though I had written to you about my

feelings.

Then you told me you needed to focus on more important things.

Two responses. Two timestamps. Two documented choices to receive evidence of civil rights violations and do nothing.

That record will form the evidentiary foundation of a federal claim.

A 1983 claim does not require that you personally committed the acts. It requires that you, acting under color of state law, knew of constitutional violations, failed to act, and that your failure caused continued harm. Your August 26th response establishes awareness with a timestamp and a promise you did not keep. Your December 8th response establishes that you received the full record, understood its weight, converted it into therapeutic language, and closed communication.

The responsibility for what happened at Honeyman State Park did not end with the employees who acted. It moved upward through every person with authority who received documentation and chose silence. You were the institutional authority who should have ended this. You received it all. You promised review and delivered nothing. You called the second attempt emotional experience and considered the matter beneath you.

You fired a manager and forced a resignation over nepotism in 2015. You called accountability a top priority. In 2025 you had audio recordings, timestamps, and written evidence of coordinated abuse and the use of state resources to intimidate a gay volunteer on public land while he was isolated and alone — and you wished me healing.

The distance between what you said accountability means and what you chose when it cost something will be at the center of this case.

You have had 192 days to act differently. Your time runs out the day I file.

Robert Samuel White

Former Oregon State Parks Volunteer

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