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February 24, 2026

VIA E-MAIL ONLY: michael.i.hawkins2@gmail.com

Michael Hawkins
66258 Lewiston Hwy
Enterprise, OR 97828

Re: Petition for Public Records Disclosure Order
Department of Administrative Services
DOJ Files: 107011-GA0040-26

Dear Mr. Hawkins:

This letter is the Attorney General's response to your petition under the Oregon Public Records Law, ORS 192.311 to 192.478. Your petition asks the Attorney General to review the response of the Department of Administrative Services (DAS) to your records request. For the reasons discussed below, we respectfully deny your petition.

Your petition explains that you sought records related to a specific DAS investigation concerning Oregon State Police personnel. You indicate that DAS provided a fee estimate of $10,650, representing 142 hours of professional staff time to review and produce the investigative file. You have requested that we "review the reasonableness of DAS's fee estimate."

Agencies may establish fees reasonably calculated to recover actual costs in making public records available. ORS 192.324(4)–(5). Although the Attorney General generally does not have the authority to review the reasonableness of a fee estimate, the Attorney General may evaluate claims that "the amount of the fee in comparison to the nature of the request suggests that the true purpose of the fee is to constructively deny the request, rather than to recoup the agency's actual costs." *Attorney General's Public Records & Meetings Manual* 18 (2024). This evaluation requires the public body to explain how it calculated its fee.

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We contacted Travis Hampton, with DAS's Chief Human Resources Office (CHRO), to discuss the fee estimate. He indicated the estimate reflects the scope and complexity of the requested records. The underlying investigation spanned multiple months and generated a vast amount of documentation. Due to the subject matter of the investigation, Mr. Hampton stated that the records require review and redaction to protect sensitive information, such as Criminal Justice Information Systems (CJIS) data and confidential personnel details. Mr. Hampton stated that DAS conservatively estimated 142 hours of professional[1] staff time for this work calculated as follows:

28-page summary report: 2 hours for review and redaction.[2]

35 Witness Interview Notes: 1 hour per interview for review and redaction (35 hours total).

35 Interview Recordings: 3 hours converting recordings to transcripts plus 1 hour per transcript for redaction (35 hours total).

400-500 Individual Exhibits: The electronic files contain numerous folders with subfolders of information. The exhibits found in these folders range from one page to many pages. While the number of exhibits may exceed 500 documents, a conservative estimate of 10 minutes per exhibit review was applied to the low range of 400 exhibits. This produced an estimate of 67 hours.

Given the volume of responsive material and the sensitive nature of the records sought, DAS's fee estimate appears reasonably calculated to recoup the actual costs associated with providing all categories of records sought by you. For this reason, we respectfully deny your petition.

Sincerely,

BENJAMIN GUTMAN
Deputy Attorney General

DEP:pjn
c via e-mail only: Bryanna Duke (Department of Administrative Services)

[1] Per DAS's Statewide Policy on Fees, professional time is charged at $75 per hour and includes human resources professional time.
[2] Mr. Hampton indicated that DAS can provide you with a separate fee estimate to produce only this report.