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June 30, 2026

Lonnie Glinski, SID #6124844
Two Rivers Correctional Institution
82911 Beach Access Road
Umatilla, Oregon 97882

Re: Petition for Public Records Disclosure Order
Oregon Department of Corrections
DOJ File No.: 291200-GA0117-26

Dear Mr. Glinski:

This letter is the Attorney General's response to your petition for disclosure under the Oregon Public Records Law, ORS 192.311 to 192.478. Your first petition asks the Attorney General to review the Oregon Department of Corrections' (ODOC) determination that the records you seek are exempt from disclosure. For the reasons discussed below, we respectfully deny your petition.

The Public Records Law confers the right to inspect public records in Oregon, unless such records are exempt under ORS 192.338, 192.345, or 192.355. ORS 192.314(1). The law is a disclosure law, and exemptions from disclosure must be express. Any person denied the right to inspect or to receive a copy of a public record of a state agency may petition the Attorney General to review the record and determine if it may be withheld. ORS 192.411(1). The agency carries the burden to sustain its actions. ORS 192.411(1).

Your petition stems from a request for the "call-out list of appointments for 5/1/26 for housing unit 5 TRCI [without] names and SID numbers." ODOC denied your request based on ORS 192.355(5) (the corrections records exemption) and ORS 192.355(2) (the personal privacy exemption). Your petition followed.

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We contacted Toby Tooley, ODOC's Public Records Program Manager, to discuss your petition and the callout sheet you requested. Mr. Tooley first explained that you were not housed in Unit 5 at the time this callout sheet was posted, and the records do not pertain to you. He further explained that public release of callout sheets implicates security and privacy concerns that would prejudice the rehabilitation of adults in custody (AICs) and affect ODOC's ability to carry out its duties:

> ODOC's housing unit callout sheets facilitate the safe and orderly movement of AICs throughout ODOC facilities. When an AIC is scheduled for a callout, an authorized ODOC employee enters it into a secure database. Housing unit staff then access that database to print a daily callout sheet for their housing unit. The callout sheet shows what movements are authorized for AICs on the unit for that day. Depending on the housing unit, the sheet itself may or may not be visible to AICs on the unit. The callout sheet changes every day.
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> Housing unit callout sheets include the names of AICs with authorized callouts, their cell numbers, the time of their scheduled callouts, the location of their callouts, and a brief description of the purpose of their callouts. For example, such information can include callouts to Health Services with brief descriptors (e.g., "glucose" or "dental"), attorney calls (including attorney names), and law library time. This information, if released in response to a public records request (as opposed to its fleeting use on housing units) would compromise the privacy of AICs, implicating ORS 192.355(2)(a). The Department of Corrections has further determined that releasing this information would interfere with the rehabilitation of AICs and substantially prejudice or prevent the carrying out of the functions of the Department, implicating ORS 192.355(5). ORS 192.355(5) is implicated because—if released—callout sheets could be exploited to learn when AICs have unescorted line movements as well as medical issues or pending legal matters, potentially leading to targeting or violence or contraband movement.
>
> Redacting names and SID numbers from housing unit callout sheets would not resolve the Department's concerns. Housing unit callout sheets are in a standardized format. Thus, someone looking at a redacted callout sheet with basic knowledge about a housing unit's population could "reverse engineer" it with relatively little effort, enabling them to make an educated guess about the identity of the AICs associated with each listed appointment and leading back to the concerns identified above.

ORS 192.355(5) exempts ODOC records "to the extent that disclosure would interfere with the rehabilitation of a person in custody of the department or substantially prejudice or prevent the carrying out of the functions of the department, if the public interest in confidentiality clearly outweighs the public interest in disclosure." After reviewing the callout sheet at issue and discussing it with Mr. Tooley, we find that ODOC has adequately explained how disclosure could interfere with the rehabilitation of persons in custody and substantially prejudice or prevent ODOC from fulfilling its responsibilities. The legislature has charged

ODOC with a number of duties concerning persons committed to its jurisdiction[1] including the responsibility to exercise custody over AICs both safely and securely. To that end, we recognize that the public and ODOC have legitimate and substantial interests in maintaining confidentiality over callout sheets that reveal the unescorted movement of AICs as well as personal information that can be used to target AICs.

Next, we assess whether "the public interest in confidentiality clearly outweighs the public interest in disclosure" in this instance. ORS 192.355(5). In making this determination, we have previously concluded that the public interest in confidentiality will, in most instances, clearly outweigh the public interest in disclosure "[i]f disclosure would threaten or impair Corrections' ability to preserve internal order and discipline in its correctional facilities, to maintain facility security against escape or unauthorized entry, or to protect the public's safety * * * ." *Attorney General's Public Records and Meeting Manual* at 90 (2024). We conclude that disclosing a callout sheet could threaten or impair the interests identified above. And because your petition does not identify any public interest in the callout sheet that would overcome the strong public interest in maintaining its confidentiality, we conclude that ODOC was permitted to withhold it under ORS 192.355(5). We therefore respectfully deny your petition.

Sincerely,

BENJAMIN GUTMAN
Deputy Attorney General

DEP:pjn
c via e-mail only: Toby Tooley, DOC

[1] *See* ORS 423.020(1).