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November 4, 2026

VIA E-MAIL ONLY: andreas@satyatherapeutics.com

Andreas Met
Satya Therapeutics
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Re: Petition for Public Records Disclosure Order
Oregon Health Authority
DOJ File No.: 443748-GA0207-26

Dear Mr. Met:

This letter is the Attorney General's response to your petition for the disclosure of records under the Oregon Public Records Law, ORS 192.311 to 192.478. Your petition asks the Attorney General to direct the Oregon Health Authority (OHA) to disclose transaction-level sales concerning psilocybin products. For the reasons that follow, 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 any such denial. *Id*.

Your petition stems from a request for transaction level psilocybin sales dates reported to OHA. OHA supplied some of the requested information, but has withheld two fields you seek, the product dose in milligrams and the unique sales identification number assigned to each transaction. OHA denied those portions of the request citing ORS 475A.586(1)(a). Your petition followed.

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We contacted OHA concerning your petition. We learned that OHA's Medical Cannabis and Psilocybin program (MCAP) uses a system called the Training Program, Licensing, and Compliance Product Tracking System (TLC-PTS) that tracks the entire process of psilocybin cultivation, production, and sale as directed by ORS chapter 475A. All licensed psilocybin manufacturers must use TLC-PTS to report the cultivation, harvesting, processing, testing, packaging, transport, and sale of psilocybin products to licensed service centers. All licensed service centers also must use the TLC-PTS to report the purchase, inventory, and sale of psilocybin products to individual clients.

Psilocybin manufacturers are required to report every product sale to individual service centers to MCAP through the TLC-PTS. MCAP considers this sales data to be private business info that manufacturers would not want disclosed to competitors. As such, MCAP considers this sales info to be part of a manufacturer's proprietary information under ORS 475A.586(1)(d), which exempts from public disclosure under ORS 192.311 to 192.478 information "related to any record that [OHA] determines contains proprietary information of a licensee."

The term "proprietary" is not defined in statute or rule. We understand "proprietary information of a licensee" in the context ORS 475A.586 to mean information, privately owned by an OHA licensee, over which the licensee retains some protectable interest.[1] With this understanding, we have no reason to second-guess the determination, statutorily entrusted to OHA, that sales data of a particular manufacturer reported to OHS is the proprietary information of that manufacturer. And because we accept OHA's determination that this information is proprietary to OHA's licensees, it is expressly exempt from disclosure under ORS 475A.486(1)(d). *See also* ORS 192.355(9)(a) (exempting from disclosure records or information made confidential, restricted or privileged under other Oregon law). We therefore respectfully deny your petition.

Sincerely,

BENJAMIN GUTMAN
Deputy Attorney General

FMB:pjn
c via email only: Jeanne Windham (OHA)

[1] *See* Public Records Order, Jul 7, 2021, Wren (examining definition of "proprietary information of a licensee" in similarly worded statute applicable to cannabis sales data).