

Andrew C. DeWeese, OSB 136332  
Andrew DeWeese, PC  
3055 NW Yeon Avenue, #527  
Portland, Oregon 97210  
Telephone: (971) 303-0351  
andrew@andrewdeweese.com  
*Of Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

JEFFERSON PACKING HOUSE, LLC,

Plaintiff,

v.

TARA WASIAK, in her official Capacity as Executive Director of the Oregon Liquor and Cannabis Commission, PATRICK GREEN, in his official Capacity as District Attorney of Jackson County, Oregon, and PAUL CHARAS, in his official Capacity as District Attorney of Lake County, Oregon,

Defendants.

Case No. 3:25-cv-1791

FIRST AMENDED COMPLAINT FOR  
DECLARATORY AND INJUNCTIVE  
RELIEF

Plaintiff JEFFERSON PACKING HOUSE, LLC (“JPH”) files this first amended complaint for Declaratory and Injunctive Relief against TARA WASIAK, in her official capacity as Executive Director of the Oregon Liquor and Cannabis Commission, PATRICK GREEN, in his official capacity as District Attorney of Jackson County, Oregon, and PAUL CHARAS, in his official capacity as District Attorney of Lake County, Oregon, and states as follows:

## INTRODUCTION

1. This is a lawsuit challenging the validity and enforceability of ORS 475C.229, an Oregon statute which purports to restrict and regulate the production, processing, transport, and sale of cannabis and cannabis products in ways that violate the Dormant Commerce Clause of the United States Constitution.

2. For many years, all forms of cannabis were illegal to manufacture or possess under the Controlled Substances Act (“CSA”). The 2018 Farm Bill decriminalized “hemp,” *i.e.*, cannabis with less than 0.3% delta-9 tetrahydrocannabinol by dry weight, and allowed states to regulate hemp production pursuant to federally approved state plans. “[T]he only statutory metric for distinguishing controlled marijuana from legal hemp is the delta-9 THC concentration level.” *AK Futures LLC v. Boyd St. Distro, LLC*, 35 F.4<sup>th</sup> 682, 690 (9<sup>th</sup> Cir. 2022).

3. Oregon’s state recreational marijuana program, enacted by 2014 Oregon Ballot Measure 91, is administrated by the Oregon Liquor and Cannabis Commission (“OLCC”), which issues and administrates marijuana production, processing, wholesale, and retail licenses. The OLCC began issuing these licenses in early 2016.

4. At the time Measure 91 was drafted and passed, the United States Department of Justice adhered to an enforcement memorandum, dated August 29, 2013, authored by Deputy Attorney General James M. Cole (the “Cole Memo”), which provided, among other things, that enforcement of the CSA against state-legal marijuana businesses was deprioritized to the extent that marijuana from legal states was not being trafficked to other states.<sup>1</sup>

---

<sup>1</sup> It is unclear to what extent the Cole Memo reflects concern regarding transfers from “legal” states to other “legal” states. The Cole Memo provides, in relevant part:

The Department [of Justice] is also committed to using its limited investigative and prosecutorial resources to address the most significant threats in the most effective, consistent and rational way. In furtherance of these objectives, as several states enacted laws relating to the use of marijuana for medical purposes, the Department in recent years

5. Originating within the text of Measure 91, what is now ORS 475C.229 provides that it is illegal in the state of Oregon for anyone to import or export a marijuana item from Oregon. ORS 475C.229 was included in Measure 91 in an effort to insulate Oregon’s state-level marijuana program from federal scrutiny, by structuring it in conformity with the Cole Memo.

6. In other words, the purpose of what is now ORS 475C.229 was and is to protect a federally illegal state marketplace from federal enforcement of federal law.

7. The definition of “marijuana item” in ORS 475C.229(b) currently includes not only (a) items that are “marijuana” under both the 2018 Farm Bill and Oregon law, but also (b) items that are “marijuana” under Oregon law, but “hemp” under the 2018 Farm Bill.

8. As a result, ORS 475C.229 prohibits the import and export of a federally legal product (hemp, as defined under the 2018 Farm Bill), as well as a federally illegal product (marijuana, as defined under the CSA), although OLCC licensees may sell both types of products within Oregon.

9. Plaintiff is a business which holds an OLCC marijuana wholesale license and engages in the business of buying and selling cannabis products.

10. While Plaintiff’s OLCC license allows Plaintiff to purchase and sell cannabis and cannabis products (including marijuana) within the state of Oregon, ORS 475C.229, together with the rules promulgated by the OLCC and the Oregon Department of Agriculture (“ODA”) and the

---

has focused its efforts on certain enforcement priorities that are particularly important to the federal government:

...

- Preventing the diversion of marijuana from states where it is legal under state law in some form to other states[.]

.....  
Memorandum for all United States Attorneys, Cole, James M., August 29, 2013.

Oregon Health Authority (“OHA”), prohibit Plaintiff from importing or exporting any type of cannabis.

11. Plaintiff operates its business in Southern Oregon, in the heart of a traditional cannabis farming bioregion, and its business model is to serve as a “hub” for the region’s farms and distribute their products statewide (or, if allowed, nationwide). But for ORS 475C.229 and the regulations promulgated thereunder, Plaintiff would distribute these products to wholesale customers in other states, and specifically, the states of California and Nevada. Additionally, if not prevented from doing so by Oregon law, Plaintiff would purchase products from out-of-state producers in (without limitation) California and Nevada, for sale in both Oregon and in other states.

12. An effect of ORS 475C.229 is to protect Oregon cannabis producers and manufacturers from competition from out-of-state producers and manufacturers. For example, all cannabis within the OLCC license system must stay within Oregon, even if it could be processed more efficiently out-of-state; correspondingly, Oregon processors may not import product from out-of-state. *See Pike v. Bruce Church, Inc.*, 397 U.S. 137 (1970) (holding that Arizona law that required cantaloupes grown in state to be processed and packed in state violated Dormant Commerce Clause).

13. Moreover, Oregon cannabis producers and manufacturers are spared from competing with out-of-state producers and manufacturers, who might seek to bring competing products to the Oregon market.

14. As a result, ORS 475C.229 should be held unconstitutional because it violates the core antidiscrimination principles of the Dormant Commerce Clause of the United States Constitution, as well as facially discriminating against interstate commerce.

15. Alternatively, ORS 475C.229 should be held unconstitutional as applied to OLCC licenses such as Plaintiff who want to:

- a. Import/export federally-defined marijuana; and
- b. Import/export federally-defined hemp which is “marijuana” under Oregon law (referred to herein as “State-excluded hemp”).

16. Holding ORS 475C.229 unconstitutional will not “protect an illegal national marketplace from state restrictions.” *Peridot Tree WA, Inc. v. Wash. State Liquor & Cannabis Control Bd.*, Nos. 24-3481, 24-7196, 2026 U.S. App. LEXIS 14, at \*24 (9th Cir Jan. 2, 2026) (“*Peridot Tree*”). Instead, allowing ORS 475C.229 to stand will leave in place a law expressly designed to insulate a federally illegal state market from federal law enforcement.

17. Plaintiff does not seek to use the Dormant Commerce Clause “to facilitate interstate commerce that is illegal under federal law.” *Peridot Tree WA, Inc.*, at \*19. The Dormant Commerce Clause is a fundamental part of the relationship between the States and the federal government and imposes a clear limit on the power held by States to make laws. A court that holds a state law unconstitutional under the Dormant Commerce Clause neither “facilitates” nor impedes commerce, because in striking down the statute the court does not promote or facilitate whatever the statute forbids, but rather forbids the State from enforcing laws which are beyond its constitutional purview.

18. A brief note on cannabis nomenclature: from this point forward in this Complaint, the following terms are defined as:

- a. “**Cannabis**” means “the plant *Cannabis sativa* L., and any part of that plant, including the seeds thereof and all derivatives, extracts, cannabinoids, isomers,

acids, salts, and salts of isomers, whether growing or not.” For the sake of brevity, “Cannabis” includes products made from Cannabis.

- b. **“Marijuana”** means Cannabis with a delta-9 tetrahydrocannabinol concentration of *more* than 0.3 percent on a dry weight basis. Marijuana is illegal under the CSA, but is regulated in Oregon under ORS Chapter 475C, and OLCC-licensed businesses are authorized under Oregon law to engage in in-state commerce in Marijuana. For the sake of brevity, “Marijuana” includes products made from Marijuana.
- c. **“Hemp”** refers to the definition of “hemp” under 7 USC § 1639o(1), and means “the plant Cannabis sativa L. and any part of that plant, including the seeds thereof and all derivatives, extracts, cannabinoids, isomers, acids, salts, and salts of isomers, whether growing or not, with a delta-9 tetrahydrocannabinol concentration of not more than 0.3 percent on a dry weight basis.” For the sake of brevity, “Hemp” includes products made from Hemp. Hemp is federally legal under the 2018 Farm Bill.
- d. Delta-9-THC” and “THC” mean delta-9 tetrahydrocannabinol. Delta-9 THC is a psychoactive cannabinoid, primarily responsible for the cannabis “high.”
- e. “Delta-9-THCA” and “THCA” mean tetrahydrocannabinolic acid. THCA is a non-psychoactive cannabinoid found in raw or growing cannabis, and may have anti-inflammatory, neuroprotective, and anti-nausea properties. THCA is converted to Delta-9 THC by the application of heat (e.g., smoking, vaping, baking, etc.), through a process called decarboxylation. Delta-9 THC is not produced in significant quantities directly by plant enzymes or the growth process, and does not

occur in raw cannabis unless decarboxylation has occurred, but Delta-9 THC levels in cured flowers sold in marijuana dispensaries often exceed the 0.3 percent threshold as a result of the drying process. However, if raw cannabis is harvested and kept at low temperatures through the drying and curing process to avoid decarboxylation, cured cannabis flower may be produced containing sub-0.3 percent levels of Delta-9 THC, but high levels of THCA. This product is known as “THCA Flower” and is available for online purchase in approximately 38 states, as it is “hemp” under federal law.

- i. This category of cannabis is referred to in this pleading as “**State-excluded Hemp**”, meaning Cannabis that meets the definition of Hemp under 7 USC § 1639o(1) but does not meet the definition of State-defined Hemp; in other words, Cannabis which (i) has a delta-9 tetrahydrocannabinol concentration of not more than 0.3 percent on a dry weight basis; AND (ii) has a Total THC concentration *exceeding* 0.3 percent on a dry weight basis. For the sake of brevity, “State-excluded Hemp” includes products made from State-excluded Hemp AND products made from Hemp or State-defined Hemp which qualify as State-excluded Hemp.<sup>2</sup> State-excluded Hemp is federally legal under the 2018 Farm Bill but is considered “Marijuana” under Oregon law; Oregon law makes commerce in State-excluded Hemp illegal for all,

---

<sup>2</sup> For example, a Cannabis plant which qualifies as Hemp or State-defined Hemp may be processed into oil which has a concentration of THC and/or THCA which exceeds 0.3% by weight. High-quality THCA oil which contains less than 0.3% delta-9 THC is therefore “Hemp” under the 2018 Farm Bill, but is “State-excluded Hemp” under Oregon law, even though it was processed from cannabis that was State-defined Hemp.

other than OLCC licensees, and OLCC licensees such as JPH may not import or export State-excluded Hemp.

- f. **“Total THC”** means “the sum of the concentration or mass of THCA multiplied by 0.877 plus the concentration or mass of delta-9-THC.”
- g. **“State-defined Hemp”** means Cannabis that (i) has a delta-9 tetrahydrocannabinol concentration of not more than 0.3 percent on a dry weight basis; AND (ii) has a Total THC concentration of *not more than* 0.3 percent on a dry weight basis. For the sake of brevity, “State-defined Hemp” includes products made from State-defined Hemp. State-defined Hemp is both federally legal under the 2018 Farm Bill and legal under Oregon law. Under Oregon law, businesses and individuals who hold hemp licenses from the Oregon Department of Agriculture may engage in interstate commerce in State-defined Hemp.
- h. Conceptually, all “State-defined Hemp” is “Hemp,” but not all “Hemp” is “State-defined Hemp,” as some “Hemp” is “State-excluded Hemp.”

### **PARTIES AND JURISDICTION**

19. Plaintiff JEFFERSON PACKING HOUSE, LLC (“JPH”) is an Oregon limited liability company, located in Jackson County, Oregon, that holds a recreational marijuana wholesaler license under Oregon law.

20. Defendant TARA WASIAK is the Executive Director of the OLCC. Based on ORS 475C.229, the OLCC’s rules and policies prohibit marijuana licensees from exporting marijuana and marijuana products, and Director Wasiak is responsible for enforcing ORS 475C.229 through those rules and policies.

21. Defendant PATRICK GREEN is the district attorney for Jackson County, Oregon, and is responsible for enforcing ORS 475C.229.

22. Defendant PAUL CHARAS is the district attorney for Lake County, Oregon, and is responsible for enforcing ORS 475C.229.

23. This Court has federal question jurisdiction pursuant to 28 U.S.C. § 1331 since JPH has asked it to rule that Oregon's law violates the United States Constitution.

### **BACKGROUND**

24. JPH would import and export Marijuana to and from other states with legal marijuana programs, including in Nevada and California, if Oregon law did not prohibit it from doing so.

25. JPH has identified customers in other states with legal marijuana programs, including in Nevada and California, and is ready, willing, and able to engage in commerce in Marijuana with such customers but is prevented from doing so under Oregon law.

26. JPH would import and export State-excluded Hemp to and from other states, including in Nevada and California, if Oregon law did not prohibit it from doing so.

27. JPH has identified customers in other states, including in Nevada and California, and is ready, willing, and able to engage in commerce in State-excluded Hemp with such customers but is prevented from doing so under Oregon law.

28. JPH's primary place of business is located in Jackson County, Oregon, and if not prohibited from doing so by ORS 475C.229, JPH would transport its products (including any and all products classified as Marijuana, State-defined Hemp, or State-excluded Hemp) to California via Jackson County, Oregon.

29. If not prohibited from doing so by ORS 475C.229, JPH would transport its products (including any and all products classified as Marijuana or State-excluded Hemp) to Nevada via Lake County, Oregon.

30. Oregon law harms JPH by increasing its operating costs and preventing it from taking advantage of economies of scale.

31. Oregon law also harms JPH by putting it at a competitive disadvantage in the market for Hemp because it cannot source Hemp from out-of-state, and it cannot ship Hemp out-of-state, both of which limit its customer base and ability to offer a complete range of products at the best prices.

32. Oregon law also harms JPH by putting it at a competitive disadvantage in the market for Marijuana because it cannot source Marijuana from out-of-state, and it cannot ship Marijuana out-of-state, both of which limit its customer base and ability to offer a complete range of products at the best prices.

33. Oregon law also harms JPH by putting it at a competitive disadvantage in the market for State-defined Hemp because it cannot source State-defined Hemp from out-of-state, and it cannot ship State-defined Hemp out-of-state, both of which limit its customer base and ability to offer a complete range of products at the best prices.

34. Oregon law also harms JPH by putting it at a competitive disadvantage in the market for State-excluded Hemp because it cannot source State-excluded Hemp from out-of-state, and it cannot ship State-excluded Hemp out-of-state, both of which limit its customer base and ability to offer a complete range of products at the best prices.

35. If JPH disregards Oregon law and imports or exports Marijuana, Hemp, State-defined Hemp, or State-excluded Hemp, JPH, its owner, and its employees, will face civil and criminal penalties.

**ORS 475C.229 IS UNCONSTITUTIONAL**

36. ORS 475C.229 expressly privileges Oregon residents over non-residents, unambiguously prohibiting any export or import of marijuana from or to Oregon.

37. ORS 475.229 provides:

**475C.229 Prohibition against importing or exporting marijuana items.** (1) For purposes of this section:

(a) “Export” includes placing a marijuana item in any mode of transportation for hire, such as luggage, mail or parcel delivery, even if the transportation of the marijuana item is intercepted prior to the marijuana item leaving this state.

(b) “Marijuana item” includes an industrial hemp commodity or product that exceeds the greater of:

- (A) A concentration of 0.3 percent total delta-9-tetrahydrocannabinol; or
- (B) The concentration of total delta-9-tetrahydrocannabinol allowed under federal law.

(2) A person may not import marijuana items into this state or export marijuana items from this state.

(3) A violation of this section is a Class B violation, except:

- (a) As provided in subsection (4) of this section; or
- (b) If the item is industrial hemp and does not exceed a total delta-9-tetrahydrocannabinol concentration of one percent.

(4) A violation of this section is a:

(a) Class A misdemeanor, if the importation or exportation:

- (A) Is not for consideration and the person holds a license issued under ORS 475C.065, 475C.085, 475C.093 or 475C.097; or
- (B) Concerns an amount of marijuana items that exceeds the applicable maximum amount specified in ORS 475C.337 (1)(a) to (f).

(b) Class C felony, if the importation or exportation:

- (A) Is for consideration and the person holds a license issued under ORS 475C.065, 475C.085, 475C.093 or 475C.097;
- (B) Concerns an amount of marijuana items that exceeds 16 times the applicable maximum amount specified in ORS 475C.337 (1)(a) to (f); or
- (C) Concerns a cannabinoid extract that was not purchased from a marijuana retailer that holds a license issued under ORS 475C.097.

38. ORS 475C.229 discriminates against interstate commerce and in favor of intrastate commerce by nakedly prohibiting such commerce, without any legitimate, nonprotectionist purpose, and is therefore prohibited by the Dormant Commerce Clause of the U.S. Constitution (“DCC”).

39. There is no constitutionally adequate reason for Oregon, or any other State, to bar the import or export of Marijuana.

40. There is no constitutionally adequate reason for Oregon, or any other State, to bar the import or export of Hemp.

41. There is no constitutionally adequate reason for Oregon, or any other State, to bar the import or export of State-defined Hemp.

42. There is no constitutionally adequate reason for Oregon, or any other State, to bar the import or export of or State-excluded Hemp.

43. Protecting the local cannabis industry (from competition, federal law enforcement, or any other reason) is a purely protectionist motive and is therefore plainly unconstitutional under the DCC.

44. Attempting to appease the perceived enforcement priorities of the federal government to induce the DOJ to continue its policy of nonenforcement of state-legal marijuana activities (which violate federal law equally as much as interstate commerce in marijuana) implicates fatal separation of powers concerns, as only Congress can authorize the States to regulate interstate commerce, not the DOJ, an agency of the executive branch. “The DOJ cannot use enforcement treats to supply the states with a convenient nonprotectionist excuse for restricting interstate commerce in cannabis because that would be tantamount to authorizing the states to

restrict such commerce.” Robert A. Mikos, *Interstate Commerce in Cannabis*, 101 B.U. L. Rev. 857 (2021).

45. ORS 475C.229 is stifling Oregon’s marijuana producers and industry participants as they are unable to access the enormous out-of-state demand for their Oregon-produced products.

46. Additionally, ORS 475C.229 protects in-state producers and manufacturers from competition with out-of-state producers and manufacturers, harming wholesalers such as JPH, as well as consumers.

### **COUNT I**

#### **U.S. Const. Art. I, § 8, Cl. 3, 42 U.S.C. § 1983**

#### **(Facial Challenge)**

47. JPH realleges the preceding paragraphs as if fully set forth herein.

48. The U.S. Constitution prohibits state laws that discriminate against citizens of other states.

49. A state law that discriminates against interstate commerce on its face “invokes the strictest scrutiny of any purported legitimate local purpose and of the absence of nondiscriminatory alternatives.” *Hughes v. Oklahoma*, 441 U.S. 322, 337 (1979). *See also Camps Newfound/Owatonna, Inc. v. Town of Harrison, Me.*, 520 U.S. 564, 581 (1997) (strict scrutiny of a law that facially discriminates against non-residents “is an extremely difficult burden, so heavy that facial discrimination by itself may be a fatal defect”).

50. ORS 475C.229 expressly seeks to regulate interstate commerce in marijuana by prohibiting it.

51. ORS 475C.229 does not have a legitimate local purpose.

52. JPH is harmed by ORS 475C.229 because the law interferes with JPH's ability to participate in commerce with residents of other states, including in other states where such commerce would, but for an import/export ban, be legal under the laws of that state (i.e., other states which have legal adult use marijuana). ORS 475C.229 also devalues JPH by significantly limiting the universe of potential customers it can reach. ORS 475C.229 also harms JPH by preventing it from taking advantage of economies of scale, which would significantly increase its ability to profit.

53. Injunctive and declaratory relief are needed to resolve this dispute between the Defendants and JPH because ORS 475C.229 violates the United States Constitution and subjects JPH to serious, concrete, and irreparable injuries.

54. Because this is an action to enforce JPH's constitutional rights brought pursuant to 42 U.S.C. § 1983, JPH should receive its reasonable attorneys' fees in the case. *See* 42 U.S.C. § 1988.

## **COUNT II**

### **U.S. Const. Art. I, § 8, Cl. 3, 42 U.S.C. § 1983**

#### **(As-Applied – Marijuana)**

55. JPH realleges the preceding paragraphs as if fully set forth herein.

56. The U.S. Constitution prohibits state laws that discriminate against citizens of other states.

57. ORS 475C.229 expressly seeks to regulate interstate commerce in Marijuana by prohibiting such commerce, even in the case of OLCC licensees such as Plaintiff, who may lawfully engage in commerce in Marijuana within the State of Oregon under state law.

58. ORS 475C.229 does not have a legitimate local purpose.

59. JPH is harmed by ORS 475C.229 because the law interferes with JPH's ability to participate in commerce with residents of other states, including in other states where such commerce would, but for an import/export ban, be legal under the laws of that state (i.e., other states which have legal adult use marijuana). ORS 475C.229 also devalues JPH by significantly limiting the universe of potential customers it can reach. ORS 475C.229 also harms JPH by preventing it from taking advantage of economies of scale, which would significantly increase its ability to profit.

60. Injunctive and declaratory relief are needed to resolve this dispute between the Defendants and JPH because ORS 475C.229 violates the United States Constitution and subjects JPH to serious, concrete, and irreparable injuries.

61. Because this is an action to enforce JPH's constitutional rights brought pursuant to 42 U.S.C. § 1983, JPH should receive its reasonable attorneys' fees in the case. *See* 42 U.S.C. § 1988.

### **COUNT III**

#### **U.S. Const. Art. I, § 8, Cl. 3, 42 U.S.C. § 1983**

#### **(As-Applied – State-excluded Hemp)**

62. JPH realleges the preceding paragraphs as if fully set forth herein.

63. The U.S. Constitution prohibits state laws that discriminate against citizens of other states.

64. ORS 475C.229 expressly seeks to regulate interstate commerce in State-excluded Hemp by prohibiting such commerce, even in the case of OLCC licensees such as Plaintiff, who may lawfully engage in commerce in State-excluded Hemp within the State of Oregon under state law.

65. ORS 475C.229 expressly seeks to regulate interstate commerce in State-excluded Hemp by prohibiting it.

66. ORS 475C.229 does not have a legitimate local purpose.

67. JPH is harmed by ORS 475C.229 because the law interferes with JPH's ability to participate in commerce with residents of other states, including in other states where such commerce would, but for an import/export ban, be legal under the laws of that state (i.e., other states which have legal adult use marijuana). ORS 475C.229 also devalues JPH by significantly limiting the universe of potential customers it can reach. ORS 475C.229 also harms JPH by preventing it from taking advantage of economies of scale, which would significantly increase its ability to profit.

68. Injunctive and declaratory relief are needed to resolve this dispute between the Defendants and JPH because ORS 475C.229 violates the United States Constitution and subjects JPH to serious, concrete, and irreparable injuries.

69. Because this is an action to enforce JPH's constitutional rights brought pursuant to 42 U.S.C. § 1983, JPH should receive its reasonable attorneys' fees in the case. *See* 42 U.S.C. § 1988.

**WHEREFORE**, JPH requests that this Court enter judgment:

- A) declaring that ORS 475C.229 violates the United States Constitution;
- B) enjoining Defendants from restricting interstate Commerce in Marijuana and State-excluded Hemp;
- C) awarding JPH its attorneys' fees and costs pursuant to 42 U.S.C. § 1988; and,

///

///

D) granting such other and further relief as the Court deems just and proper.

Dated: February 26, 2026

Respectfully submitted,

**ANDREW DEWEESE, PC**

By: /s/ Andrew C. DeWeese

Andrew C. DeWeese, OSB 136332  
Andrew DeWeese, PC  
3055 NW Yeon Avenue, #527  
Portland, Oregon 97210  
Telephone: (971) 303-0351  
Email: andrew@andrewdeweese.com  
*Of Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that, on the date below, I electronically filed the foregoing with the Clerk of the Court of the United States District Court for the District of Oregon by using the CM/ECF system. An electronic copy was also served upon:

YoungWoo Joh #164105  
Kate E. Morrow #215611  
Assistant Attorneys General  
Trial Attorneys  
Tel (971) 673-1880  
Fax (971) 673-5000  
youngwoo.joh@doj.oregon.gov  
kate.e.morrow@doj.oregon.gov  
*Of Attorneys for Defendant Tara Wasiak*

DATED this 26<sup>th</sup> day of February, 2026.

**ANDREW DEWEESE, PC**

By: /s/ Steph Barnhart  
Paralegal to  
Andrew DeWeese, OSB 136332  
3055 NW Yeon Avenue, #527  
Portland, Oregon 97210  
andrew@andrewdeweese.com  
Telephone: (971) 303-0351  
*Of Attorney for Plaintiffs*  
steph@andrewdeweese.com