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October 24, 2019

Secretary of State Bev Clarno  
900 Court St. NE, #136  
Salem, OR 97301


Dear Madame Secretary,

Thank you for your letter, which our office received yesterday, regarding the case of *Anantha v. Clarno*. After considering your request, I believe it is appropriate to authorize conflict counsel in this matter.

Any defense of the *Anantha* matter is likely to require arguments adverse to the interests of the Oregon State Legislative Assembly and adverse to the interests of the people wielding the initiative power reserved to them by the Oregon Constitution.

I believe these conflicts of interests are best resolved in the manner that you propose.

Sincerely,

  
Ellen F. Rosenblum  
Oregon Attorney General





Bev Clarno  
SECRETARY OF STATE

The Honorable Ellen Rosenblum  
1162 Court Street NE  
Salem, OR 97301  
October 21, 2019

Dear: Madame Attorney General,

I have just completed a meeting with Michael Kron, Fred Boss and Sarah Weston all of your office, and Deputy Rich Vial and Elections Director Steve Trout, regarding the lawsuit filed against me in *Anantha v. Clarno* (IP'S 35-37). During that meeting it became clear that your office had serious reservations about defending me in that suit, and so I am writing to request permission to engage counsel pursuant to OAR 125-247-0295.

My reasons for desiring to secure outside counsel should not in any way be construed to reflect a lack of respect for the quality and qualifications of your staff. However, in our meeting we were unable to reach a mutual agreement on the best course of future action in this matter for my office. Given that we have conflicting views of how to move forward, I believe it would be in both our best interests to bring in assistance from the outside.

Thank you for your prompt attention to this matter.

Sincerely,

Bev Clarno  
Secretary of State