

No. 25A759

IN THE SUPREME COURT OF THE UNITED STATES

ABDULLAHI SAID ALI,
Petitioner,

v.

CITY OF PORTLAND,
Respondent

On Petition for Writ of Certiorari to the Court of Appeals of the State of Oregon

PETITION FOR WRIT OF CERTIORARI

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QUESTION PRESENTED

Does a city ordinance that prohibits carrying a loaded firearm in public, but permits a defendant to raise an affirmative defense that the defendant had a concealed-handgun license, violate the Second Amendment to the United States Constitution?

RELATED PROCEEDINGS

Multnomah County Circuit Court:
21CR33362

Oregon Court of Appeals:
A181186; *City of Portland v. Ali*, 339 Or App 674 (2025)

Oregon Supreme Court:
S071996; 374 Or 372 (2025)

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PETITION FOR WRIT OF CERTIORARI

Petitioner, Abdullahi Said Ali, respectfully asks this Court to issue a writ of certiorari to review the opinion and judgment in this case.

RELATED CASES AND OPINIONS BELOW

The Oregon Court of Appeals' opinion (App., *infra*, 1a) is available at 339 P.3d 674 (2025), and the Oregon Supreme Court's denial of review (App., *infra*, 5a) is available at 374 Or. 372. The trial court made the ruling on review, orally on the record; the trial court's judgment of conviction is attached at App. 6a.

JURISDICTION

The Oregon Court of Appeals issued its opinion on April 16, 2025. The Oregon Supreme Court denied discretionary review on September 18, 2025. On January 2, 2025, Justice Kagan extended the time within which to file this petition to February 15, 2026.¹ A copy of that decision appears at App. D. This Court has jurisdiction under 28 U. S. C. § 1257(a).

¹ Because February 15, 2026, was a Sunday and February 16, 2026, a holiday per 5 U. S. C. § 6103, the deadline for filing the petition is February 17, 2026. *See* Sup. Ct. R. 30.1.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Pertinent constitutional provisions and statutes are attached. App., *infra*, 8-14a.

STATEMENT OF THE CASE

I. Introduction

Portland, Oregon City Code (PCC) 14A.60.010(A) states that “[i]t is unlawful for any person to knowingly possess or carry a firearm, in or upon a public place, including while in a vehicle in a public place, recklessly having failed to remove all the ammunition from the firearm.” PCC 14A.60.010(C), in turn, identifies fourteen affirmative defenses a person could raise in their defense at trial, including that the person is “licensed to carry a concealed handgun.” PCC 14A.60.010(C)(3). But the likelihood of future vindication at trial might be small solace to a license holder who encounters police interference with their exercise of their right to carry a firearm; in Oregon, an arresting officer need not eliminate the possible existence of a defense or an exception to an offense. *State v. Sepelak*, 346 Or. App. 819, 822 (2026).

The Second Amendment presumptively protects all conduct within the plain meaning of its operative clause: “the right of the people to keep and bear Arms, shall not be infringed.” *New York State Rifle & Pistol Ass’n Inc. v. Bruen*, 597 U.S. 1, 24 (2022). When a law infringes on presumptively protected conduct, “[t]he government must then justify its regulation by

demonstrating that it is consistent with the Nation’s historical tradition of firearm regulation.” *Id.*

In *Bruen*, the Court struck down a New York law that required a person establish “proper cause” to obtain the concealed-carry license necessary to possess a firearm lawfully. *Id.* at 70. It contrasted that law with the “shall issue” licensing regimes of 43 states, including Oregon. *Id.* at 13, 13 n. 1.

Oregon Revised Statute (ORS) 166.291(1) provides that “[t]he sheriff of a county, upon a person’s application for an Oregon concealed handgun license, upon receipt of the appropriate fees and after compliance with the procedures set out in this section, shall issue the person a concealed handgun license[.]” However, ORS 166.291(2) belies the mandatory, almost ministerial tone of that “shall issue” provision because it allows a sheriff to deny an application

“[n]otwithstanding ORS 166.291(1) . . . if the sheriff has reasonable grounds to believe that the applicant has been or is reasonably likely to be a danger to self or others, or to the community at large, as a result of the applicant’s mental or psychological state or as demonstrated by the applicant’s past pattern of behavior involving unlawful violence or threats of unlawful violence.”

An applicant may petition for judicial review. A trial court reviews whether “the sheriff has reasonable grounds for denial.” ORS 166.293(6). At the first level of appeal from the trial court, the court reviews applications *de*

novo. ORS 166.293(10); *Concealed Handgun License for Stanley v. Myers*, 276 Or. App. 321, 327 (2016).

II. Procedural Background

On June 18, 2021, a Portland Police officer stopped petitioner for traffic infractions. Tr. 90-91. After the officer explained the reason for the stop, petitioner told the officer that he had a gun next to his leg. Tr 92. It was in a bag, not concealed. Tr 101-02. It was loaded. Tr 101-02. Petitioner said that he had purchased the gun and did not have a concealed handgun license. Tr 92. He said that he knew that he needed to have a license. Tr. 94.

The city charged petitioner with possession of a loaded firearm in public, PCC 14A.60.010(A). Petitioner moved to dismiss, or, in the alternative, demur to the charging instrument because under *Bruen*, PCC 14A.60.010(A) violated the Second Amendment both on its face and as applied. As to the as-applied challenge, he presented evidence that he had been seriously wounded by gunfire in Portland in 2020 and thus, had a particular need to carry a firearm for his own defense that was greater than the average citizen. App Op Br at ER-2-14; Tr. 83-87.

The trial court denied petitioner's motion because Oregon "does not have that proper cause requirement that New York has" and because petitioner's "special circumstances" did not warrant it. Tr 81, 87. It found petitioner guilty after a stipulated-facts trial. App., *infra*, 6a.

Petitioner renewed his arguments on appeal. App Op Br at 7-17. The Oregon Court of Appeals affirmed. App., *infra*, 1-4a. In rejecting petitioner’s facial challenge, it relied on its opinion in *City of Portland v. Sottile*, 336 Or. App. 741, 561 P.3d 1159 (2024), *cert. den sub nom. Sottile v. Portland, OR*, 25-6428, 2026 WL 135735 (Jan 20, 2026). *Ali*, 339 Or. App. at 675. *Sottile* held that PCC 14A.60.010(A) was not unconstitutional in all applications because

“[t]he manner of regulation of carrying firearms under the ordinance, as it relates to defendant’s own conduct, has existed throughout our nation’s history; limiting a person’s ability to carry a loaded concealed weapon—particularly where the state has a shall-issue licensing regime, as Oregon does—is consistent with the nation’s history of regulating firearm possession.”

Sottile, 336 Or. App. at 749-50.

As to petitioner’s as-applied challenge, the court concluded:

“[T]he fact that defendant sustained a gunshot wound six months earlier, absent additional evidence of the circumstances of the incident or as to why defendant was carrying a firearm in a manner that contravened PCC 14A.60.010(A) six months after his injury, does not permit a reasonable inference that PCC 14A.60.010(A) poses a constitutionally impermissible impediment to defendant’s ability to carry a firearm for purposes of self-defense.”

Ali, 339 Or. App. at 676.

The Oregon Supreme Court denied review. App., *infra*, _5a.

REASONS FOR GRANTING THE PETITION

This Court should allow review because the Oregon courts have interpreted and applied the Second Amendment in a way that conflicts with its

history; this Court’s decisions; and other jurisdictions. This is an issue that affects not just safety and welfare of all Oregonians, but the ability of all Americans to exercise their Second Amendment right to self-defense.

I. The government has the burden to show that a restriction on openly carrying an operable and loaded firearm in public is consistent with the historical tradition of firearms regulation.

The “operative clause” of the Second Amendment is that “the right of the people to keep and bear Arms, shall not be infringed.” *District of Columbia v. Heller*, 554 U.S. 570, 578 (2008). It “guarantee[s] the individual right to possess and carry weapons in case of confrontation.” *Id.* at 592. Self-defense “was the *central component* of the right itself.” *Id.* at 599 (emphasis in original). The right to bear arms in public for self-defense is not “a second-class right, subject to an entirely different body of rules than the other Bill of Rights guarantees.” *Bruen*, 597 U.S. at 70 (internal citation and quotation marks omitted). It is one of the “fundamental rights necessary to our system of ordered liberty” and is incorporated through the Fourteenth Amendment. *McDonald v. Chicago*, 561 U.S. 742, 778 (2010). Just as with restrictions of other fundamental rights like speech, “the Government bears the burden of proving the constitutionality of its actions” that encroach upon an individual’s Second Amendment rights. *Bruen*, 597 U.S. at 24 (quoting *United States v. Playboy Entertainment Group, Inc.*, 529 U.S. 803, 816 (2000)).

In *Bruen*, the Court considered the constitutionality of New York’s “proper cause” licensing regime, which restricted licenses for carrying firearms in public to those who “demonstrate[d] a special need for self-protection distinguishable from that of the general community.” 597 U.S. at 12. The Court held that this “proper cause” requirement was unconstitutional because the text of the Second Amendment “presumptively guarantees” the “right to ‘bear’ arms in public for self-defense,” and New York did not meet its burden to demonstrate that the “proper-cause requirement [was] consistent with this Nation’s historical tradition of firearm regulation.” *Id.* In reaching that conclusion, the Court conducted an exhaustive historical survey, finding no “historical limitation” that “operated to prevent law-abiding citizens with ordinary self-defense needs from carrying arms in public for that purpose.” *Id.* at 60. Rather, the Court identified an “enduring American tradition permitting public carry.” *Id.* at 67. Only in “exceptional circumstances,” such as when appearing before justices of the peace and other government officials, could governments mandate that ordinary, law-abiding citizens “not carry arms.” *Id.* at 70.

Bruen announced a two-part test that requires the government to prove that any restriction on a person’s protected Second Amendment conduct is consistent with the nation’s historical tradition of firearm regulation:

“[T]he standard for applying the Second Amendment is as follows: When the Second Amendment’s plain text covers an individual’s conduct, the Constitution presumptively protects that conduct. The government must then justify its regulation by demonstrating that it is consistent with the Nation’s historical tradition of firearm regulation. Only then may a court conclude that the individual’s conduct falls outside the Second Amendment’s ‘unqualified command.’”

Id. at 24 (internal citation omitted). *See also United States v. Rahimi*, 602 U.S. 680, 691 (2024) (applying that same standard).

The primary method for the state to meet its burden is reasoning by historical analogy. *Bruen*, 597 U.S. at 28. The state must show that a historical analogue is “relevantly similar.” *Id.* at 29. And while *Bruen* does not “provide an exhaustive survey” of all the factors that might guide a court’s historical reasoning, it emphasized that the primary metrics are “how and why” the respective regulations burden the right to possess arms for self-defense:

“‘[I]ndividual self-defense is “the *central component*” of the Second Amendment right.’ Therefore, whether modern and historical regulations impose a comparable burden on the right of armed self-defense and whether that burden is comparably justified are ‘*central*’ considerations when engaging in an analogical inquiry.”

Id. (emphasis in original) (internal citations omitted).

Bruen’s analogical reasoning is “neither a regulatory straightjacket nor a regulatory blank check.” *Id.* at 30. A court must “consider[] whether the challenged regulation is consistent with the principles that underpin our regulatory tradition” and “ascertain whether the new law is ‘relevantly similar’

to laws that our tradition is understood to permit, ‘apply[ing] faithfully the balance struck by the founding generation to modern circumstances.’” *Rahimi*, 602 U.S. at 692 (quoting *Bruen*, 597 U.S. at 29).

II. There is a jurisdictional split as to whether the historical tradition of firearm regulation permits a prohibition on openly carrying a loaded firearm without a license.

PCC 14A.60.010(A) restricts conduct that the text of the Second Amendment protects. Possessing a firearm constitutes “keep[ing]” and “bear[ing]” arms. *See Heller*, 554 U.S. at 628-29 (holding statute that barred possession of handguns in the home unconstitutional). The Second Amendment also protects a person’s right to carry a loaded firearm because requiring a firearm to be inoperable “makes it impossible for citizens to use them for the core lawful purpose of self-defense and is hence unconstitutional.” *Heller*, 554 U.S. at 630. Thus, PCC 14A.60.010(A) is presumptively unconstitutional unless the city establishes that PCC 14A.60.010 “is consistent with this Nation’s historical tradition of firearm regulation.” *Bruen*, 597 U.S. at 17.

The city has yet to do so. In *Sottile*, the case upon which the Oregon Court of Appeals relied in this case, the court did not point to any specific historic examples of a regulation banning the carrying of a loaded firearm in public. 336 Or App at 748-49. Because the case concerned a facial challenge, the court held that if PCC 14A.060.010 “is capable of constitutional application to people, like defendant, who carry loaded concealed firearms without lawful

authorization, then defendant’s facial challenge necessarily fails.” *Id.* Thus, the court upheld PCC 14A.060.010 because it “is capable of constitutional application to people who carry loaded, concealed firearms without obtaining a concealed handgun license through Oregon’s shall-issue licensing scheme.” *Id.* at 749. This reasoning ignores dissonance between needing a *concealed* carry license to possess openly and the chilling effect a broad law might have on a person’s lawful exercise of their fundamental right.

Oregon’s decision stands at odds with that of its Federal circuit. The Ninth Circuit concluded that an “urban open-carry ban,”—a California statute that allows open-carry licenses only in counties with a population of less than 200,000—violated the Second Amendment. *Baird v. Bonta*, 163 F.4th 723, 751 (9th Cir. 2026). Like the Portland ordinance at issue here, a Californian may, with a license, carry a concealed firearm. *Id.* at 748-49. The Ninth Circuit recognized that “[f]or most of American history, open carry has been the default manner of lawful carry for firearms.” *Id.* at 727. It further observed that the Founding Era had laws that regulated the discharge, storage, and aggressive use of firearms, but “there were *no* direct statutory bans on the carry of arms.” *Id.* at 733 (quoting Jonathan Meltzer, *Open Carry for All: Heller and Our Nineteenth-Century Second Amendment*, 123 Yale L.J. 1486, 1505 (2014) (emphasis in *Baird*). Cases from state courts in the 19th century show an understanding of the fundamental right to carry arms “in full open view” that

is not present with concealed carry, which some Framers viewed as roguish. *Id.* at 735 (quoting *State v. Chandler*, 5 La. Ann. 489, 489-90) (1850). After all, visibly carrying a gun puts others on notice that one is armed at the outset of a potentially volatile encounter.

The Ninth Circuit does not represent a consensus among the federal courts of appeals. The Second Circuit reached the opposite conclusion in *Frey v. City of New York*, 157 F.4th 118, 139 (2d Cir. 2025). Like the California statute in *Baird*, the New York law at issue in *Frey* eliminates open carry but permits concealed carry with a license. *Id.* at 139. The court relied on *Bruen*'s statement that “[t]hroughout modern Anglo-American history, the right to keep and bear arms in public has traditionally been subject to well-defined restrictions governing . . . the manner of carry.” *Id.* at 138 (quoting *Bruen*, 597 U.S. at 38 (alterations in *Frey*)). The court also construed *Bruen*'s footnote describing “shall issue” permitting regimes as putting a burden on the person making the Second Amendment challenge to make “at least *some* showing to overcome t[he] presumptive constitutionality of a shall-issue licensing regime.” *Id.* at 140 (emphasis in original) (internal citation omitted)). This is also starkly different than the Ninth Circuit's conclusion in *Baird*, where it concluded that “*Bruen* left open the possibility of as-applied challenges to such licensing regimes.” 163 F.4th at 738.

III. This Court should resolve whether a “shall issue” licensing regime such as the one in Oregon satisfies the Second Amendment.

Baird and *Frey* illustrate a rift between circuits that interpret *Bruen* as approving all the “shall issue” licensing regimes that opinion describes in a footnote, or whether courts should conduct a more substantive examination.

Bruen notes that 43 states, including Oregon, use “shall issue” licensing regimes, which it contrasted with the “proper cause” requirement of New York. *Bruen*, 597 U.S. at 13 n 1. In another footnote, *Bruen* explained that it was not calling those laws into question—they were not before the Court. But the Court also cautioned against doing what the Second Circuit and Oregon have done: inferring the Court’s endorsement of those 43 states’ licensing regimes:

“[N]othing in our analysis should be interpreted to suggest the unconstitutionality of the 43 States’ ‘shall-issue’ licensing regimes, under which ‘a general desire for self-defense is sufficient to obtain a [permit].’ Because these licensing regimes do not require applicants to show an atypical need for armed self-defense, they do not necessarily prevent ‘law-abiding, responsible citizens’ from exercising their Second Amendment right to public carry. Rather, it appears that these shall-issue regimes, which often require applicants to undergo a background check or pass a firearms safety course, are designed to ensure only that those bearing arms in the jurisdiction are, in fact, ‘law-abiding, responsible citizens.’ And they likewise appear to contain only ‘narrow, objective, and definite standards’ guiding licensing officials, rather than requiring the ‘appraisal of facts, the exercise of judgment, and the formation of an opinion,’—features that typify proper-cause standards like New York’s. That said, because any permitting scheme can be put toward abusive ends, *we do not rule out constitutional challenges to shall-issue regimes* where, for example, lengthy wait times in processing license applications or exorbitant fees deny ordinary citizens their right to public carry.”

Bruen, 597 U.S. at 13 n 1 (emphasis added).

Although New York was not among the 43 shall-issue states, the New York laws used “shall issue” phrasing to describe the threshold requirements necessary to obtain a license; the problem was that they also had a “proper cause” requirement. N.Y. Penal Law §400.00(2)(c)-(f). This Court struck them down because “authorities have discretion to deny ... licenses even when the applicant satisfies the statutory criteria.” *Bruen*, 597 at 14-16.

Oregon’s “shall issue” regime raises the red flags that *Bruen* forewarned. Oregon employs the statutory phrase “shall issue” to describe threshold requirements. ORS 166.291 provides that a sheriff “shall issue” a concealed handgun permit provided an applicant meets 16 eligibility criteria. An applicant must “[d]emonstrate[] competence with a firearm by completing a course or “equivalent experience”; be free from various pending and completed criminal sanctions; never have been civilly committed; and not have any other possible order restricting firearm possession. ORS 166.291 also imposes fees for a person to access fundamental Second Amendment rights that restrict the indigent from access to a permit.

Were those readily verifiable criteria the only ones necessary for a sheriff to issue a concealed handgun license, Oregon’s licensing scheme might pass muster. However, even if an applicant meets those all of those requirements, a

sheriff may deny any application where the sheriff has “reasonable grounds to believe” the person “has been or is reasonably likely to be” a danger to themselves or the community as a result of the person’s “mental or psychological state” or past behavior. ORS 166.293(3). And a trial court applies a deferential reasonableness-upon-reasonableness standard on review. It assesses “the reasonable grounds” that led the sheriff to believe that a person is “reasonably likely” to endanger themselves or others.

A Portlander such as petitioner, with a need for armed self-defense, runs into the processing-time problem to which *Bruen* alluded. ORS 166.292 provides that if the sheriff approves the application, the sheriff “shall” mail the license within 45 days of the application. If the sheriff rejects the application, a circuit court may take another 15 days to review that decision, and of course, appeals may take much longer.²

Further, even if the Second Amendment permits “shall issue” licensing regimes, PCC 14A.60.010(A) goes step further. It makes the lawfully licensed possession of a firearm an affirmative defense, making possession of a firearm presumptively unlawful until a person its legality, either to a police officer in a

² For example, an appeal from the revocation of a concealed handgun license took more than a year for an opinion to issue after briefing and oral argument were complete. *Concealed Handgun License for Stanley*, 276 Or. App. at 321.

street encounter or as a criminal defendant at trial. *See* ORS 161.055 (setting out preponderance standard for affirmative defenses). Due Process limits when a state may shift the burden to a criminal defendant to negate an element of a crime. *See, e.g., Bieganski v. Shinn*, 149 F.4th 1055, 1068-70 (9th Cir. 2025) (analyzing this Court’s cases regarding due process and affirmative defenses). That limit should curtail the government’s restrictive authority even more tightly when an affirmative-defense element directly restricts not merely otherwise-lawful conduct, but the exercise of a fundamental individual right.

For all of these reasons, *Bruen* and *Rahimi* require the city to demonstrate that this burden on is consistent with the nation’s history of firearm regulation. *Bruen*, 597 U.S. at 28-29. It has not met its burden here.

CONCLUSION

For the foregoing reasons, petitioner respectfully asks this court to grant this petition for a writ of certiorari and allow plenary review. In the alternative, petitioner requests that this court vacate the judgment and remand the case for reconsideration in light of evolving Second Amendment jurisprudence and this Court’s forthcoming decisions in *United States v. Hemani*, 24-1234, 146 S. Ct. 326 (2025) (certiorari granted October 20, 2025), and *Wolford v. Lopez*, 24-1046, 146 S. Ct. 79 (2025) (certiorari granted October 3, 2025), which both address the constitutionality of firearms restrictions under the Second Amendment.

Respectfully submitted,

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