FILED 12 MAY '26 11:33 USDC-ORE

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

JUSTIN ALDERMAN,

Plaintiff,

vs.

ALFALFA FIRE DISTRICT; FIRE CHIEF CHAD LAVALLEE, in his individual capacity; OPERATIONS CHIEF KEEGAN PARVIN, in his individual capacity; BOARD MEMBER NATHAN STARR, in his individual capacity; BOARD MEMBER MARK LAUCKS, in his individual capacity; BOARD MEMBER DUSTIN PIGGOT, in his individual capacity; and BOARD MEMBER CAROYLN CHASE, in her individual capacity;

Defendants,

Case No. 6:26-cv-00952-MTK

COMPLAINT FOR DECLARATORY, INJUNCTIVE, AND RETROSPECTIVE RELIEF

COMPLAINT

Plaintiff Justin Alderman ("Plaintiff") hereby sues the Alfalfa Fire District, an Oregon special district and government body; Alfalfa Fire District Chief Chad LaVallee, operations chief Keegan Parvin; elected board member Nathan Starr; elected board member Mark Laucks; elected board member Dustin Piggot; and elected board member Carolyn Chase (collectively, "Defednants"), for Defendants' deprivation of Plaintiff's rights under the First and Fourteenth Amendments to the United States Constitution.

Paid 15968

INTRODUCTION

1.

This First Amendment lawsuit seeks to vindicate the free-speech rights of the Plaintiff, who is a full-time investigative journalist and managing editor of the Prineville Review, a publication of Western Media Group. The publication is a general-interest news publication, and Plaintiff's reporting, while diverse, is primarily focused in recent years on investigative reporting involving local government.

2.

On April 8th, 2026, Defendants took action to remove both Plaintiff and members of the public from publicly accessible areas on public property where the Alfalfa Fire District is located. This was conducted immediately after the sudden "policy" *(Plaintiff's Exhibit 1)* that was promptly adopted by the elected Alfalfa Fire District Board during a public meeting, and used as a pretext to infringe on Plaintiff's constitutional rights. After subsequent reporting revealing that the Oregon Secretary of State had also launched an investigation into the Alfalfa Fire District over possible election law violations tied to the current May 2026 ballot, the Alfalfa Fire District issued an egregious formal notice of trespass against Plaintiff, not only from its publicly accessible property (e.g. sidewalks, parking lots, etc), but even from attending public meetings.

JURISDICTION AND VENUE

3.

Plaintiff Justin Alderman is suing under the First Amendment and Fourteenth Amendment; the Civil Rights Act of 1871, 42 U.S.C. § 1983; and the Declaratory Judgment Act, 28 U.S.C § 2201.

4.

This Court has federal-question jurisdiction under 28 U.S.C § 1331 and civil-rights jurisdiction under 28 U.S.C § 1343.

5.

Venue lies in this Court under 28 U.S.C § 1391(b)(2) because, as described below, the events giving rise to the claims in this action occurred in Deschutes County, Oregon, which is covered by the Eugene Division of the US Court for the District of Oregon.

PARTIES

6.

Plaintiff Justin Alderman is a citizen of the United States and a resident of Crook County, Oregon.

7.

Defendant Alfalfa Fire District is an Oregon special district and local public body that incorporates an area, namely, within the boundaries of Deschutes County, Oregon, and in which its administrative headquarters is located.

8.

Defendant Chad LaVallee is the current Fire Chief of the Alfalfa Fire District. He is sued in his individual capacity.

9.

Defendant Keegan Parvin is the Alfalfa Fire District Operations Chief. He is sued in his individual capacity.

10.

Defendant Nate Starr is an elected board member for the Alfalfa Fire District. He is sued in his individual capacity.

11.

Defendant Mark Laucks is an elected board member for the Alfalfa Fire District. He is sued in his individual capacity.

12.

Defendant Dustin Piggot is an elected board member for the Alfalfa Fire District. He is sued in his individual capacity.

13.

Defendant Carolyn Chase is an elected board member for the Alfalfa Fire District. She is sued in her individual capacity.

STATEMENT OF FACTS

14.

Plaintiff Justin Alderman is a journalist and publisher associated with the Prineville Review, an Oregon-based news publication covering local government and public affairs. He is an active member of the Society of Professional Journalists.

15.

Beginning in late 2024, Mr. Alderman began investigating and reporting on the Alfalfa Fire District ("AFD"), its Board of Directors, and Fire Chief Chad LaVallee after receiving complaints and tips from local residents regarding alleged nepotism, financial concerns, annexation-related controversies, and transparency issues involving the District.

16.

Mr. Alderman's reporting and investigative work included attendance at public meetings, submission of public records requests, interviews with citizens, photography and videography on public property, and publication of news articles concerning the District and its officials.

17.

Mr. Alderman almost immediately began identifying apparent deficiencies in the District's compliance with Oregon public meetings law, including concerns involving meeting notices, agendas, and related procedural requirements.

18.

After attempting to address those concerns informally without success with the Defendants in late 2024, Mr. Alderman submitted a formal public meetings grievance around March 2025 under procedures established by Oregon law, a step that is a prerequisite before an optional formal complaint can be filed with the Oregon Government Ethics Commission who investigates public meetings violations.

19.

Following Mr. Alderman's formal grievance and despite not escalating the grievance at the time to a formal complaint, and do to increasing questions raised regarding financial practices and other transparency issues, interactions between Mr. Alderman and certain Defendants, including Chief Chad LaVallee and Board President Nathan Starr, became increasingly adversarial.

20.

Throughout 2025, Mr. Alderman continued investigating and reporting on matters involving the District, including allegations that residents of Juniper Acres had been improperly subjected to taxation following premature annexation-related filings submitted by Chief LaVallee to the Oregon Department of Revenue before the annexation was brought before county commissioners or even a vote of the citizens during an election.

21.

Mr. Alderman additionally uncovered reports from the Oregon Secretary of State indicating that the District faced possible dissolution proceedings due to repeated failures to file legally required annual audit reports and for being three or more years behind in its reports.

22.

After a year looking affairs of the district, on November 7, 2025, Mr. Alderman released his first public article titled *"Alfalfa Fire District again flagged by Oregon Secretary of State for audit failures, faces dissolution."*

(https://prinevillereview.com/alfalfa-fire-district-again-flagged-by-oregon-secretary-of-state-for-audit-failures-faces-dissolution/)

23.

Following publication of Mr. Alderman's initial reporting, Chief LaVallee publicly criticized Mr. Alderman, Mr. Alderman's journalism, and Mr. Alderman's reporting methods.

24.

Mr. Alderman subsequently continued publishing additional reporting concerning the District's financial and governance issues, including an article published on January 13, 2026 concerning the District's overdue audit filings.

25.

On January 14, 2026, Mr. Alderman attended a public meeting of the AFD Board of Directors.

26.

Following adjournment of the meeting, Mr. Alderman engaged in ordinary newsgathering activity, including speaking with citizens regarding their views and experiences involving the District and its officials.

27.

During those interactions, citizens expressed criticism of the District and Chief LaVallee, while Mr. Alderman discussed difficulties obtaining public records and concerns relating to transparency and governance.

28.

During the post-meeting interactions, Chief LaVallee repeatedly flashed a phone camera light through a meeting-room window toward Mr. Alderman and citizens speaking outside the building.

29.

After Mr. Alderman began recording Chief LaVallee's conduct, Chief LaVallee exited the building and immediately accosted Mr. Alderman for engaging in the conversation with community

members who were known to be critical of Chief LaVallee.

30.

After admitting that he had been monitoring conversations between Mr. Alderman and citizens outside the fire station through the District's security camera system, including a Ring doorbell camera, Chief LaVallee threatened legal action against Mr. Alderman by both the fire district's attorney and his personal attorney for alleged "defamation" arising from Mr. Alderman's reporting, public records activities, and statements made during those conversations.

31.

Chief LaVallee additionally threatened to publish damaging allegations concerning Mr. Alderman if Mr. Alderman continued pursuing public records and investigative reporting involving the District.

32.

Mr. Alderman questioned Chief LaVallee about having been secretly recording without clear notification as required under Oregon law. Chief LaVallee then instead claimed that no audio was being recorded from the security system and that it was based on what he claimed others had just minutes earlier overhead, although Chief LaVallee, during that time prior, was engaged in taking photos or recording from his cellphone

33.

Based upon those threats, legal counsel representing Mr. Alderman and Western Media Group subsequently sent a cease-and-desist demand to Chief LaVallee and the District concerning the threatened conduct directed toward Mr. Alderman.

34.

At the time the cease-and-desist correspondence was sent, Mr. Alderman and Mr. Alderman's counsel were not yet aware that Chief LaVallee had already published statements concerning Mr. Alderman on social media following the January 14, 2026, meeting.

35.

Mr. Alderman later obtained copies of the social media posting, which included statements by Chief LaVallee on or about January 15th, 2026, concerning Mr. Alderman, Mr. Alderman's reporting, and Mr. Alderman's public records activities.

36.

In those statements, Chief LaVallee asserted that he had received "pretty heavy allegations" concerning Mr. Alderman involving "illegal dealings," stated that he had "hired an investigator to look into them," and further stated that if the allegations were confirmed they would be shared publicly and with "all Central Oregon news outlets."

37.

Chief LaVallee additionally criticized Mr. Alderman's reporting and Mr. Alderman's public records activities, including Mr. Alderman's requests for District financial records and Mr. Alderman's reporting concerning the District's audit issues, annexation matters, and financial oversight.

38.

On information and belief, the social media postings were subsequently removed following receipt of the cease-and-desist correspondence.

39.

In the same social media statements, Chief LaVallee discussed Mr. Alderman's reporting concerning District operations, District financial matters, public records activities, and issues involving the Alfalfa Fire District while identifying himself and speaking in his capacity as Fire Chief of the Alfalfa Fire District.

40.

On February 11, 2026, Mr. Alderman again attended a public meeting of the AFD Board.

41.

Following the meeting, Chief LaVallee aggressively grabbed and ripped a copy of the

District's meeting agenda from Mr. Alderman's hands after Mr. Alderman approached an area where physical agenda copies were being maintained. The interaction was captured on multiple videos.

43.

Immediately following the incident, Chief LaVallee expressed hostility toward Mr. Alderman's photography and recording activities occurring outside the fire station on publicly accessible property prior to the meeting.

44.

Mr. Alderman subsequently sought clarification from Chief LaVallee regarding his objections to Mr. Alderman's photography and recording activities, but failed to identify any lawful basis prohibiting such conduct.

APRIL 8TH, 2026, PUBLIC MEETING:

45.

On April 6, 2026, Mr. Alderman received notice of an April 8, 2026 public meeting of the AFD Board. Included on the meeting agenda was an item identified as "Policy 2026-4 Public Meeting and adjournment policy." *(Plaintiff's Exhibit 1)*

46.

During the April 8 meeting, Defendant Nathan Starr read the proposed policy, reportedly for the first time, and the policy was adopted with minimal discussion by Defendants Starr, Laucks, Piggott, and Chase, who together comprised the elected board.

47.

Resolution 2026-4 purports to limit public access to District facilities to the duration of public meetings and authorizes trespass enforcement against persons remaining following adjournment.

48.

Immediately following the adjournment of the meeting, Mr. Alderman began seeking

comment and asking questions of Board members as part of Mr. Alderman's journalistic activities.

49.

Defendants Starr and Laucks ordered Mr. Alderman to leave pursuant to the newly adopted policy.

50.

Mr. Alderman was not causing any disruption, threatening any person, interfering with governmental operations, or otherwise engaged in disorderly conduct.

51.

Mr. Alderman ultimately exited the building after those conversations concluded and continued speaking outside with a citizen regarding District matters, including the citizen's interest in serving on the District's budget committee.

52.

Prior to the April 8 meeting, Chief LaVallee had publicly stated on social media that the District was seeking applicants for positions on the budget committee despite no apparent prior public discussion, authorization, or vote by the Board concerning such recruitment, including within any recent public meeting minutes reviewed by Mr. Alderman. This raised questions that Mr. Alderman was investigating regarding apparent and ongoing violations of the Oregon public meeting laws.

53.

The citizen Mr. Alderman spoke with was identified as Robin Rudiger, and the conversation was regarding District matters, including her interest in and perceived candidacy for serving on the District's budget committee and/or the District's elected Board of Directors.

54.

Partway into the conversation, Defendant Mark Laucks briefly approached and interacted with Mrs. Rudiger after exiting the meeting room.

55.

Following that interaction, Defendant Laucks informed Mr. Alderman and Mrs. Rudiger that their conversation was "done" and directed them toward a private driveway area adjacent to the sidewalk outside the fire station property if they wanted to continue the conversation.

56.

Mr. Alderman responded that the area where he and Mrs. Rudiger were standing was publicly accessible and stated that he would remain out of the way, additionally believing the instruction to move onto private property and road to also be improper and unsafe.

57.

Mr. Alderman then positioned himself no further than between two parked vehicles immediately adjacent to the sidewalk while continuing his conversation with Mrs. Rudiger.

58.

Defendant Laucks initially walked away toward his vehicle. Shortly thereafter, Defendant Laucks returned and positioned himself several feet away on the opposite side of a nearby truck while observing Mr. Alderman and Mrs. Rudiger's conversation.

59.

During the discussion, Mr. Alderman and Mrs. Rudiger had been discussing matters involving the District's Board of Directors, budget committee recruitment, vacancies involving the District's elected board, and Chief LaVallee's related online postings.

60.

After Defendant Laucks remained nearby oddly observing the interaction for a brief moment, Mrs. Rudiger asked Laucks, "Are we needing to go [to] a different place?"

61.

During the interaction, Defendant Laucks responded to Mrs. Rudiger by stating, "Oh that's okay," while continuing to remain nearby and observe the conversation.

62.

Mr. Alderman then turned toward Defendant Laucks and asked, "What?", appearing confused as to why Defendant Laucks continued standing nearby after indicating that the conversation was "okay."

63.

Laucks then said Mr. Alderman's name "Justin", and nothing more, to which Mr. Alderman responded: "Is there a problem with me talking to somebody?" to which Mr. Laucks responded: "No, not really.", to which Mr. Alderman responded: "Okay, thank you".

64.

Laucks then said: "But we're going to enforce policy, we'll be calling for deputy backup here if we have to,".

65.

This caused Mrs. Rudiger to immediately state: "I don't want to cause any trouble" and "It's my first meeting, so I'll leave", and promptly ended the interaction and interview with Mr. Alderman and left.

66.

Mr. Alderman also protested to Mr. Laucks by explaining he was in a publicly accessible area and was not causing any interference. Mr. Laucks responded saying: "Unless you have business with the fire department, you need to leave". Mr. Alderman explained that his business was engaging in a constitutionally protected act.

67.

Mr. Alderman further questioned Mr. Laucks saying "so if I just wanted to be here if I just wanted to film the building?", to which Mr. Laucks responded saying: "No, that's kind of a grey area".

68.

Amid ongoing debate between Mr. Alderman and Mr. Laucks, Operations Chief Keegan

Parvin opened the door from the meeting room to the outside and told Mr. Alderman that he was "going to be calling the cops" if I did not move on.

69.

Not long after, Fire Chief Chad LaVallee, who was not present at the public meeting, came driving in at a high rate of speed and parked in front of the firehouse, but remained in his vehicle.

70.

Deputies from the Deschutes County Sheriff's Office eventually arrived and proceeded to speak with Chief LaVallee & Parvin, numerous unknown paid and/or volunteer firefighters, as well as Mr. Laucks.

71.

Deputies from the Deschutes County Sheriff's Office eventually arrived and proceeded to speak with Chief LaVallee & Parvin, numerous unknown paid and/or volunteer firefighters, as well as Mr. Laucks. The specifics of that conversation is not yet known to Mr. Alderman.

72.

Deputies then spoke with Mr. Alderman, who identified himself to them and provided his issued press identification, as well as a business card, in accordance with Western Media Group's journalistic ethics and professional standards, as well as explaining why he was there.

73.

Deputies eventually claimed to Mr. Alderman that they explained to the fire staff that because the board of directors had not issued some sort of formal trespass, they they were told they were going through that step to issue a trespass, but began to still pressure Mr. Alderman to leave and that their desire was to avoid altercations.

74.

When Mr. Alderman was unwilling to immediately leave and/or provide a specific timeline to leave, and clearly again indicated he had no intention of causing and had not caused any interference

with governmental operations, a deputy, conflicting with his earlier claims, ultimately told Mr. Alderman that if he refused to leave at that moment that he would be arrested.

75.

Mr. Alderman then politely said goodbye to the deputies left the scene under duress and the clear understanding that if he remained and engaged in exercising his constitutional rights as a citizen and member of the press, that he would be arrested and taken to jail.

76.

Deputies had claimed that Mr. Alderman's alleged violation of the newly adopted "policy" was the authority that would have provided for them to arrest Mr. Alderman and enforce the trespass.

77.

The "policy" as adopted is not an ordinance or regulation as defined by Oregon law and the adoption of the policy did not follow the process for any public hearings as required by Oregon law.

78.

At no time did Mr. Alderman actually cause any interference with governmental operations, block any fire apparatus or fire staff from any necessary movement, and nor was there any response or calls for service during this time that would have prompted any response.

79.

The Defendants had not at anytime prior to April 8, 2026, in a public meeting, have any discussion related to any actual issues of safety or security from attendees following public meetings.

80.

Among matters being investigated by Mr. Alderman, were reports and findings that Defendant Nathan Starr is using his official office to allow the use of the Alfalfa Fire District's meeting room for Sunday church services, raising questions under Oregon ethics laws that are a clear and reasonable topic for reporting and investigation by a journalist, as well as questions related to the motives behind the policy and its applicability. No such policy exists related to such church services, and there is no

known public meeting documenting any approval for the Alfalfa Community Church operated by Defendant Nathan Starr to use the facilities.

81.

The policy also addresses discretionary restrictions to outside public areas, but in the context and in direct connection with only public meetings, not of other general access or other events taking place at the Alfalfa Fire District that are not required under Oregon meetings law.

APRIL 9TH, 2026 INCIDENT

82.

On April 9th, 2026, a day after the public meeting, Mr. Alderman returned to the Alfalfa Fire District in order to further investigate and gather information, including to offer officials and opportunity for comment, numerous issues involving the district. Among the issues included ongoing reports and findings involving nepotism with Chief LaVallee's hiring of his wife, her subsequent resignation after findings from records from state agencies involving grant funds used, the Chief's own use of grant funds for his own labor beyond his claimed 20 hrs of weekly paid labor, and more.

83.

Upon Mr. Alderman arriving and knocking on the front door of the fire station, the door was answered by operations chief Keegan Parvin, who declined to speak when Mr. Alderman indicated he was wanting to see if any district leadership would be open to commenting on some ongoing matters.

84.

After closing the door, Mr. Alderman waited next to the building along a sidewalk and handicap parking spot in front of the station. Chief LaVallee eventually exited and demanding Mr. Alderman immediately leave, providing no reason for the request and indicating he would call law enforcement, which on information and belief, he did.

85.

After this altercation, Leslie LaVallee, the Chief's wife who had resigned sometime in January, arrived in her personal vehicle, wearing sweats, and proceeded to the front door before entering a code and going inside the station. Mrs. LaVallee later came back outside with the assistance of a uniformed firefighter to retrieve her dog from a vehicle and proceed back into the station, allowing Mr. Alderman to also ask Mrs. LaVallee if she would like to comment on her past employment tied to the nepotism findings.

86.

Chief LaVallee later exited the firehouse on multiple occasions, including to walk to the street to photograph Mr. Alderman's vehicle, as well as on occasions to take photos or videos of Mr. Alderman. On one of those occasions, Mr. Alderman received a response to repeated attempts seeking questions or offering Chief LaVallee the opportunity to make any comment, and Chief LaVallee eventually stated that all questions for comment can be directed to their attorney, Jered Reid.

87.

During the incident, Plaintiff briefly left the firehouse and drove down the road and parked in a open gravel area off the road. Shortly after pulling into that area and parking, a Deschutes County Sheriff's Deputy pulled up in front of Mr. Alderman's vehicle. Both Mr. Alderman and the deputy existed and had a brief interaction where the deputy confirmed he was responding to a request for service. The deputy quickly informed Mr. Alderman that he was not being detained, and Mr. Alderman politely ended the interaction and said he was leaving.

88.

Mr. Alderman then proceeded back to the fire station in order to continue his activity of documenting public officials entering or existing the firehouse. While back at the firehouse, the deputy eventually drove by the fire station but appeared to return back towards Bend, Oregon.

89.

During that afternoon, Mr. Alderman had also documented on video from the sidewalk along the firehouse, multiple children in the firehouse's meeting room, before blinds were promptly shut.

90.

Mr. Alderman later suspected that the children were secretly removed from the firehouse when Mrs. LaVallee drove behind the other side of the building, as it was believed that all officials, including Chief LaVallee, eventually left the building for the evening. Mr. Alderman left immediately after Chief LaVallee had left the firehouse that day.

91.

Mr. Alderman believed this discovery added to more questions that had been raised by citizens critical of the fire chief's alleged use of district vehicles to transport his own children to/from school much further away, and reports that his children were often allowed and watched by Chief LaVallee and others district staff at the fire house. Mr. Alderman had also believed that this finding and continued investigation was relevant to the district's actions and claims tied to its reasons for the extreme policy to be used to trespass individuals immediately after a public meeting.

POST APRIL 9TH, 2026, REPORTING & FORMAL TRESPASS NOTICE

92.

Following the April 9th, 2026, incident. Mr. Alderman began preparing further reporting as well as collaborating on the issues related to the attempted trespass with its colleagues at KTVZ News Channel 21 ("KTVZ"), a news organization which frequently works with the Prineville Review on a slew of local reporting.

93.

KTVZ had been the original news outlet to break findings from former volunteer whistleblowers regarding alleged misconduct by Chief LaVallee and the fire district in early 2024, over

a year and a half before any initial reporting in late 2025 by Mr. Alderman and the Prineville Review.

94.

Both Chief LaVallee and his wife, Leslie LaVallee had also contacted KTVZ news after sharing Mr. Alderman's reporting on or about April 14th, 2026, titled *"Fire Chief's improper filings led to illegal taxing of Juniper Acres property owners; records reveal nepotism in wife's hiring"* *(https://prinevillereview.com/fire-chiefs-improper-filings-led-to-illegal-taxing-of-juniper-acres-property-owners-records-reveal-nepotism-in-wifes-hiring/)* which was published by the Prineville Review and KTVZ. The contact was part of an official act by Chief LaVallee in his capacity as fire chief to retaliate against Mr. Alderman and claim his reporting was false and defamatory.

95.

Since early 2024, KTVZ's reporting involving the district has included both independent reporting as well as simple republishing of stories by Mr. Alderman and the Prineville Review. Both the Prineville Review and KTVZ stood by the reporting from on or about April 14th, 2026

96.

After April 9th, Mr. Alderman received tips from sources who were concerned that the Alfalfa Fire District and Chief LaVallee were engaging in prohibited political advocacy under Oregon law as part of a local option levy on the current May 2026 ballot, concerns which were similar but appeared more serious amid an actual election that had been raised by citizens in late 2024 with the Prineville Review and Mr. Alderman.

97.

This prompted Mr. Alderman to review materials posted online and then to reach out to local officials in Crook and Deschutes County regarding the matter to better understand, including the county clerks who are the local election officials.

98.

Crook County Clerk Cheryl Seely later contacted Mr. Alderman about a week later on or about

April 20th after looking into the matter, reporting that she had spoken with Steve Dennison, the Deschutes County Clerk, and after reviewing public material published by the Alfalfa Fire District, reported the matter had been raised with the Oregon Secretary of State's Election Division, and that the Secretary of State's office had launched an investigation into the district. State officials directly confirmed the investigation later on, but were not at liberty to reveal any further details other than the existence of an investigation.

99.

On or about April 24th, 2026, Mr. Alderman's story *"Alfalfa Fire District under state investigation over alleged election law violations tied to levy campaign that would double taxes"* was published by the Prineville Review and KTVZ News. *(https://prinevillereview.com/alfalfa-fire-district-under-state-investigation-over-alleged-election-law-violations-tied-to-levy-campaign-that-would-double-taxes/)* (*https://ktvz.com/news/2026/04/24/alfalfa-fire-district-under-state-investigation-over-alleged-election-law-violations-tied-to-levy-campaign-that-would-double-taxes/*).

100.

Prior and after publication, Mr. Alderman made multiple attempts to seek comment from the district's then purported attorney, Jered Reid in Prineville, Oregon, based on the statement made by Chief LaVallee on April 9th, 2026. Despite voicemails and/or speaking with a secretary at Mr. Reid's office , no comment was ever made.

101.

In addition to seeking comment on the existing stories, Mr. Alderman had also explained to Mr. Reid's office it would like to confer prior to submitting a state circuit court complaint solely focused on enjoining the district from ongoing violations of the Oregon's public meetings law.

102.

On April 27th, Mr. Alderman filed that complaint in Deschutes County Circuit Court related

solely to public meetings violations under Oregon's public meeting laws, seeking an injunction against the district for repeated alleged violations and frustration under that law. While meetings law compliance had been an ongoing issue and part of his investigative reporting, the alleged failures by the district had also caused repeated and ongoing frustration in providing timely notice and/or review of public meetings.

103.

At the end of the day on April 27th, 2026, attorney Jered Reid provided a "FORMAL NOTICE OF TRESPASS" *(Plaintiff's Exhibit 2)* by email to Mr. Alderman at jalderman@prinevillereview.com. The message formally confirmed that Mr. Reid's office, Reid Kauffman, was representing the Alfalfa Fire District.

104.

The notice primarily stated:

"This Office represents the Alfalfa Fire District. Based on your violation of Board of Directors Resolution No. 2026-04, attached for your convenience, this letter shall serve as your formal notice of your prohibition to be on the above-reference premises. Any violations of these prohibitions will be enforceable under ORS 164.245."

105.

The Formal Trespass Notice also went on to state that Mr. Alderman could attend future public meetings by video or phone, clearly indicating that Mr. Alderman was also further being barred and threatened with arrest for criminal trespass under ORS 164.245 even for attendance to public meetings.

106.

The Formal Trespass Notice did not provide any period of time and is clearly intended to be indefinite.

107.

The Formal Trespass Notice did not provide any period of time and is clearly intended to be

indefinite, provides no instructions to seek local appeal directly with the Alfalfa Fire District, and further does not articulate any specific violation of its "policy".

108.

A copy of the policy was shared for the first time to Mr. Alderman with notice of the trespass. The Defendants had refused to provide any copy of this policy previously, and copies were not available for the public during its April 8th, 2026, public meeting.

INJURY TO PLAINTIFF

109.

Mr. Alderman has suffered substantial harm as a result of Defendants' actions, including the restrictions imposed on his ability to gather news, communicate with sources and citizens, attend and report on public meetings, and engage in protected journalistic activity concerning the Alfalfa Fire District and its officials.

THE APRIL 8TH, 2026, PUBLIC MEETING AND ENFORCEMENT OF THE POLICY

110.

Defendants' enforcement of the newly adopted policy on April 8, 2026 substantially interfered with Mr. Alderman's ability to gather news and conduct ordinary post-meeting interviews and conversations with citizens concerning matters of public concern involving the District.

111.

Following adjournment of the meeting, Mr. Alderman was engaged in ordinary newsgathering activities, including interviewing a citizen regarding District governance, budget committee recruitment, public meetings issues, and vacancies involving the District's Board of Directors.

112.

The Defendants nevertheless ordered Mr. Alderman to leave publicly accessible areas adjacent

to the fire station and repeatedly threatened criminal enforcement despite Mr. Alderman not interfering with governmental operations, not obstructing traffic or emergency services, and not engaging in disorderly conduct.

113.

The repeated threats of law enforcement intervention and arrest caused the citizen being interviewed by Mr. Alderman to terminate the conversation and leave the area.

114.

As a result, Mr. Alderman was prevented from continuing to gather information and interview a willing source concerning matters of substantial public concern involving local government operations and transparency.

115.

Defendants' actions also impaired Mr. Alderman's ability to communicate freely with citizens and sources who may wish to speak critically about the District or its officials due to fear of confrontation, retaliation, or law enforcement involvement.

116.

The incident further caused Mr. Alderman to fear arrest and criminal prosecution for continuing to engage in routine journalistic activities occurring on publicly accessible property adjacent to public meetings.

117.

The Defendants' conduct on April 8, 2026 chilled Mr. Alderman's exercise of his First Amendment rights and caused him to alter his conduct while engaging in future reporting involving the Alfalfa Fire District.

THE APRIL 9TH, 2026 ATTEMPTED TRESPASS ENFORCEMENT

118.

The following day, April 9, 2026, Defendants again interfered with Mr. Alderman's newsgathering activities when he returned to the District to seek comment and gather additional information concerning matters involving the District and its officials.

119.

Although Mr. Alderman was not interfering with emergency operations, obstructing access to apparatus, or preventing any District employee or volunteer from performing official duties, Chief LaVallee demanded that Mr. Alderman immediately leave and threatened to call law enforcement.

120.

Chief LaVallee's threat caused Mr. Alderman to reasonably fear that Defendants intended to use criminal trespass enforcement to prevent him from seeking comment, documenting public-facing activity at the District, and continuing his reporting.

121.

During the same incident, a sheriff's deputy later contacted Mr. Alderman after Mr. Alderman had briefly left the property and was parked in an open gravel area off the road. The deputy informed Mr. Alderman that he was not being detained and then left.

121.

The April 9 incident reinforced Mr. Alderman's reasonable belief that Defendants were attempting to use trespass threats and law enforcement involvement to deter his continued investigation and reporting concerning the District.

122.

The incident also caused Mr. Alderman to take additional precautions while reporting near District property and contributed to the chilling of his speech, newsgathering, photography, videography, and efforts to seek comment from District officials.

THE FORMAL TRESPASS NOTICE

124.

The Formal Notice of Trespass issued on April 27, 2026 caused additional and continuing harm to Mr. Alderman's constitutional rights and journalistic activities.

125.

The notice purported to indefinitely prohibit Mr. Alderman from entering Alfalfa Fire District property and further threatened him with arrest for criminal trespass if he returned.

126.

The notice additionally purported to prohibit Mr. Alderman from attending future public meetings in person, despite such meetings traditionally occurring at the District's facilities and despite the lack of any lawful findings that Mr. Alderman had disrupted governmental operations or posed any legitimate safety threat.

127.

As a result of the trespass notice and threat of arrest, Mr. Alderman faces a continuing and credible threat of criminal enforcement for engaging in constitutionally protected newsgathering activities involving the District.

128.

Although the written policy purported to address access to "interior facilities" and "restricted operational areas," Defendants applied the policy against Mr. Alderman far beyond those stated limits, including against ordinary conversations and journalistic activities occurring in publicly accessible exterior areas adjacent to the District property.

129.

As enforced against Mr. Alderman, the policy effectively prohibited him from engaging in ordinary post-meeting interviews, photography, videography, and spontaneous communications with

citizens and sources near public meetings involving the District.

130.

The broad and indefinite trespass notice issued against Mr. Alderman further expanded those restrictions by threatening criminal enforcement if Mr. Alderman returned to District property, including for purposes of attending and reporting on future public meetings.

131.

The policy and trespass notice have therefore substantially impaired Mr. Alderman's ability to gather news, cultivate sources, investigate matters involving the District, and engage in protected journalistic activities concerning issues of significant public concern.

132.

The notice has additionally interfered with Mr. Alderman's ability to engage in spontaneous communications with citizens, firefighters, witnesses, and other individuals present at or near District meetings and events.

133.

The challenged policy and trespass notice have also caused Mr. Alderman to fear additional retaliation from Defendants for continuing to investigate and report on matters involving the District, including issues concerning election-related activities, public meetings compliance, public records disputes, financial issues, and alleged misconduct involving District officials. At the time the trespass notice was issued, Mr. Alderman and the Prineville Review had spent approximately one and a half years investigating and reporting on the District and its leadership, including increasingly critical reporting concerning alleged election-related misconduct and a State of Oregon investigation into possible election law violations involving the District and its officials.

134.

The timing of the trespass notice and escalating restrictions substantially impaired Mr. Alderman's ability to continue ordinary in-person reporting, attendance at District meetings,

post-meeting interviews, photography, videography, and other investigative activities involving the District during a period of substantial public controversy and heightened public interest concerning the District's governance, election-related activities, and official conduct, including during the period preceding local elections.

135.

The Defendants' actions have caused Mr. Alderman emotional distress, anxiety, humiliation, frustration, and concern regarding his ability to safely continue investigative reporting involving the Alfalfa Fire District and other local government entities.

136.

The harms caused by Defendants are ongoing. The challenged policy remains in effect, and the Formal Notice of Trespass remains active and enforceable against Mr. Alderman.

137.

Absent declaratory and injunctive relief from this Court, Mr. Alderman will continue suffering irreparable harm to his constitutional rights for which there is no adequate remedy at law.

138.

Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

COUNT I

42 U.S.C. § 1983 - First Amendment Retaliation

(Against Defendants LaVallee, Starr, Laucks, Parvin, and Alfalfa Fire District)

139.

At all material times, Plaintiff engaged in activities protected by the First Amendment to the United States Constitution, including investigative journalism, newsgathering, photography, videography, interviewing citizens, publishing news reports, attending public meetings, submitting

public records requests, and reporting on matters of public concern involving the Alfalfa Fire District and its officials.

140.

Plaintiff's reporting included coverage concerning public meetings compliance, public records disputes, financial issues, annexation-related matters, alleged election-related misconduct, and scrutiny concerning actions taken by District officials and leadership.

141.

Defendants were aware of Plaintiff's protected activities and reporting.

142.

In response to Plaintiff's protected speech and journalistic activities, Defendants engaged in adverse actions against Plaintiff, including threats of criminal trespass enforcement, threats to involve law enforcement, interference with post-meeting interviews and communications with citizens, enforcement of the challenged policy against Plaintiff, and the issuance and continued maintenance of a formal trespass notice against Plaintiff.

143.

Defendants' awareness of Plaintiff's protected activities additionally included awareness of Plaintiff's investigative reporting, publication of articles critical of the District and its officials, public records activities, communications with citizens and sources, and reporting concerning alleged election-related misconduct and governmental transparency issues involving the District.

144.

Defendant LaVallee additionally engaged in hostile and retaliatory public statements and online postings directed toward Plaintiff and Plaintiff's reporting activities, including statements concerning Plaintiff's investigations, communications, and reporting regarding the District and its officials, further demonstrating retaliatory animus toward Plaintiff's protected speech and journalistic activities.

145.

On April 8, 2026, Defendants Starr and Laucks ordered Plaintiff to leave the fire house meeting space in response to questions, but failed to provide the same instruction to other members of the public, allowing them to remain and ask and have answered their questions.

146.

On April 8, 2026, Defendants Starr, Laucks, and Parvin ordered Plaintiff to leave publicly accessible exterior areas adjacent to the District's public meeting and threatened criminal enforcement despite Plaintiff not obstructing emergency operations, interfering with governmental functions, interrupting the meeting, or engaging in disorderly conduct.

147.

Defendant LaVallee further supported these actions in his role as chief after having discussions with law enforcement who later instructed Plaintiff to leave.

148.

Defendant Parvin additionally threatened to contact law enforcement in response to Plaintiff's continued journalistic activities and presence near the meeting location.

149.

On April 9, 2026, Defendant LaVallee again threatened law enforcement involvement and attempted trespass enforcement against Plaintiff while Plaintiff was engaged in protected newsgathering activities concerning the District.

150.

The formal trespass notice issued against Plaintiff on April 27, 2026 further escalated and continued Defendants' retaliatory actions against Plaintiff.

151.

Defendants' actions would chill a person of ordinary firmness from continuing to engage in protected speech, press, and newsgathering activities involving the District and its officials.

152.

Defendants' retaliatory conduct was substantially motivated by Plaintiff's protected speech, investigative reporting, criticism of District officials, public records activities, and reporting concerning matters of public controversy involving the District.

153.

At the time the trespass notice was issued, Plaintiff and the Prineville Review had spent approximately one and a half years investigating and reporting on the District and its leadership, including increasingly critical reporting concerning alleged election-related misconduct and a State of Oregon investigation into possible election law violations involving the District and its officials.

154.

As a direct and proximate result of Defendants' conduct, Plaintiff suffered and continues to suffer violations of rights secured by the First and Fourteenth Amendments to the United States Constitution.

155.

Pursuant to 42 U.S.C. § 1983, Plaintiff seeks declaratory relief, injunctive relief, compensatory damages, nominal damages, costs, attorney fees pursuant to 42 U.S.C. § 1988, and such further relief as this Court deems just and proper.

156.

Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

COUNT II

42 U.S.C. § 1983 - First Amendment Violations:

Freedom of Speech, Freedom of the Press, Prior Restraint, and Viewpoint Discrimination

(Against Defendants LaVallee, Starr, Laucks, Piggot, Chase and Alfalfa Fire District)

157.

The First Amendment protects freedom of speech, freedom of the press, newsgathering activities, the right to receive information, and the right to engage in spontaneous communications concerning matters of public concern occurring on publicly accessible government property.

158.

The challenged policy adopted by Defendants purports to regulate access following public meetings and authorizes restrictions and trespass enforcement concerning undefined "restricted operational areas" and "post-meeting activities."

159.

Although Defendants claimed the policy was intended to address operational and safety concerns, Defendants applied and enforced the policy against Plaintiff far beyond those stated purposes, including against ordinary interviews, conversations with citizens, photography, videography, and journalistic activities occurring in publicly accessible exterior areas.

160.

Defendants further applied and enforced the policy in a manner targeting Plaintiff's investigative reporting and criticism concerning the District and its officials.

161.

The challenged policy and trespass notice operate as unconstitutional restrictions on speech, press activities, and newsgathering protected by the First Amendment.

162.

The formal trespass notice further imposed an unconstitutional prior restraint on Plaintiff's ability to attend, document, investigate, and report on future public meetings and matters involving the District.

163.

The challenged policy was adopted specifically in the context of public meetings and

post-meeting activity and, as written and enforced, substantially burdens ordinary speech, association, networking, and spontaneous communications among citizens, journalists, elected officials, and members of the public occurring immediately following governmental meetings concerning matters of public concern.

164.

Post-meeting conversations, interviews, and spontaneous communications among members of the public and news media are longstanding and commonplace features of democratic participation and public accountability within governmental meeting forums throughout Oregon and the United States.

165.

Federal courts within Oregon (and Oregon State courts) have recognized that exclusion orders and restrictions affecting attendance at public meetings and participation in publicly accessible governmental spaces implicate substantial First Amendment concerns and require careful constitutional scrutiny, particularly where the restrictions burden protected expressive activity.

166.

Defendants lacked a sufficiently compelling governmental interest, narrowly tailored restriction, or constitutionally adequate justification for the restrictions imposed upon Plaintiff's speech, press, and newsgathering activities.

167.

As a direct and proximate result of Defendants' conduct, Plaintiff suffered and continues to suffer violations of rights secured by the First and Fourteenth Amendments to the United States Constitution.

168.

Pursuant to 42 U.S.C. § 1983, Plaintiff seeks declaratory relief, injunctive relief, compensatory damages, nominal damages, costs, attorney fees pursuant to 42 U.S.C. § 1988, and such further relief as this Court deems just and proper.

169.

Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

COUNT III

42 U.S.C. § 1983 - First Amendment Overbreadth and Vagueness

(Against Defendants LaVallee, Starr, Laucks, Piggot, Chase and Alfalfa Fire District)

170.

The challenged policy fails to clearly define the scope of prohibited conduct, the meaning of "restricted operational areas," or the specific boundaries of areas subject to trespass enforcement.

171.

The challenged policy additionally fails to define what constitutes prohibited "post-meeting activities" or provide objective standards governing enforcement decisions.

172.

The challenged policy grants Defendants broad and effectively unrestricted discretion to determine what speech, conduct, interviews, communications, gatherings, or journalistic activities may occur following public meetings.

173.

The challenged policy therefore encourages arbitrary and discriminatory enforcement against protected speech, press activities, and association occurring in connection with public meetings and matters of public concern.

174.

The challenged policy was adopted specifically in the context of public meetings and post-meeting activity and, as written and enforced, substantially burdens ordinary speech, association, networking, and spontaneous communications among citizens, journalists, elected officials, and

members of the public occurring immediately following governmental meetings concerning matters of public concern.

175.

Post-meeting conversations, interviews, and spontaneous communications among members of the public and news media are longstanding and commonplace features of democratic participation and public accountability within governmental meeting forums throughout Oregon and the United States.

176.

The challenged policy additionally permits arbitrary and selective enforcement because Defendants retain effectively unrestricted discretion to determine which activities, gatherings, conversations, or uses of District property are permissible following public meetings.

177.

On information and belief, Defendants have permitted other non-emergency and non-governmental uses of District property and publicly accessible exterior areas without applying comparable restrictions or trespass threats, further demonstrating the absence of narrowly tailored operational or safety standards governing enforcement of the policy. This includes use of District property by the Alfalfa Community Church, which Plaintiff learned was operated by Defendant Starr as its pastor, despite the absence of any publicly identified policy applying comparable restrictions to such activities or explaining how such uses are consistent with Defendants' purported operational and safety concerns.

178.

As written and enforced, the challenged policy chills constitutionally protected speech, press activities, newsgathering, photography, videography, and communications with citizens concerning matters of public concern.

179.

The challenged policy is unconstitutionally vague and overbroad both facially and as applied to

Plaintiff.

180.

As a direct and proximate result of Defendants' conduct, Plaintiff suffered and continues to suffer violations of rights secured by the First and Fourteenth Amendments to the United States Constitution.

181.

Pursuant to 42 U.S.C. § 1983, Plaintiff seeks declaratory relief, injunctive relief, compensatory damages, nominal damages, costs, attorney fees pursuant to 42 U.S.C. § 1988, and such further relief as this Court deems just and proper.

182.

Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

COUNT IV

42 U.S.C. § 1983 - Municipal Liability (Monell Claim)

(Against Defendant Alfalfa Fire District)

183.

Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

184.

At all material times, Defendant Alfalfa Fire District acted under color of state law.

185.

The constitutional violations alleged herein were caused by official policies, customs, practices, decisions, ratification, and deliberate actions attributable to Defendant Alfalfa Fire District and its final policymakers.

186.

The challenged policy regulating post-meeting access, activities, and trespass enforcement was formally adopted or approved by the governing body of Defendant Alfalfa Fire District.

187.

The formal trespass notice issued against Plaintiff was further undertaken, authorized, maintained, or ratified by Defendant Alfalfa Fire District and its policymakers.

188.

Defendants Starr, Laucks, Piggot, and Chase, as members of the governing body of the District, participated in adopting, approving, enforcing, or ratifying the challenged restrictions and trespass actions against Plaintiff.

189.

Defendants LaVallee and Parvin additionally participated in enforcement and implementation of the challenged policy and restrictions against Plaintiff.

190.

The constitutional violations suffered by Plaintiff were the direct and foreseeable result of official District policy, policymaker decisions, customs, practices, ratification, and deliberate conduct attributable to Defendant Alfalfa Fire District.

191.

As a direct and proximate result of Defendant District's actions and policies, Plaintiff suffered and continues to suffer violations of rights secured by the First and Fourteenth Amendments to the United States Constitution.

192.

Pursuant to 42 U.S.C. § 1983, Plaintiff seeks declaratory relief, injunctive relief, compensatory damages, nominal damages, costs, attorney fees pursuant to 42 U.S.C. § 1988, and such further relief as this Court deems just and proper.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in his favor and against Defendants, and grant the following relief:

(A) A declaration that Defendants' actions, policies, practices, restrictions, and enforcement actions described herein violated Plaintiff's rights secured by the First and Fourteenth Amendments to the United States Constitution;

(B) A declaration that the challenged policy adopted and enforced by Defendants is unconstitutional facially and as applied to Plaintiff;

(C) A declaration that the Formal Notice of Trespass issued against Plaintiff is unconstitutional and unenforceable;

(D) Temporary, preliminary, and permanent injunctive relief prohibiting Defendants, their officers, agents, employees, attorneys, successors, and all persons acting in concert with them from enforcing the challenged policy and Formal Notice of Trespass against Plaintiff;

(E) Temporary, preliminary, and permanent injunctive relief requiring Defendants to permit Plaintiff lawful access to publicly accessible District property and public meetings consistent with the United States Constitution;

(F) Temporary, preliminary, and permanent injunctive relief prohibiting Defendants from retaliating against Plaintiff for engaging in protected speech, press activities, public records activities, attendance at public meetings, newsgathering, photography, videography, interviewing citizens, or investigative reporting concerning matters of public concern;

(G) Compensatory damages in an amount to be determined at trial;

(H) Nominal damages in the amount of $1.00 against each individual Defendant;

(I) Punitive damages against the individual Defendants in an amount to be determined at trial for conduct undertaken maliciously, recklessly, willfully, or with deliberate indifference to Plaintiff's constitutional rights;

(J) An award of reasonable attorney fees, costs, and expenses pursuant to 42 U.S.C. § 1988 and other applicable law;

(K) Pre-judgment and post-judgment interest as permitted by law;

(L) Such other and further relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED this 12th day of May, 2026.

/s/ Justin Alderman

Justin Alderman, Plaintiff, Pro Se
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(541) 241-2074

ALFALFA FIRE DISTRICT
25889 Alfalfa Market Rd • Bend, OR 97701
Station: 541-382-2333 • www.alfalfafiredistrict.org

BOARD OF DIRECTORS RESOLUTION NO. 2026-4
A RESOLUTION ADOPTING A POLICY GOVERNING PUBLIC MEETING ADJOURNMENT AND FACILITY SECURITY

WHEREAS, the Alfalfa Fire District ("District") is a rural fire protection district organized under ORS Chapter 478 and is responsible for providing fire protection, emergency medical services, and related emergency response functions; and

WHEREAS, the District operates facilities that are actively staffed and utilized for emergency response, including apparatus bays, communication systems, operational areas, and access routes necessary for rapid deployment; and

WHEREAS, the District's facilities and grounds must remain secure and immediately accessible to ensure the safety of personnel, volunteers, and the public, and to prevent interference with emergency operations; and

WHEREAS, meetings of the Board of Directors are conducted in accordance with Oregon Public Meetings Law (ORS 192.610 – 192.705), which requires that meetings be open to the public during their duration but does not require continued public access following adjournment; and

Plaintiff Exhibit # 1

WHEREAS, the Board of Directors finds that unrestricted public presence in District facilities or operational areas after adjournment may create safety hazards, interfere with emergency response readiness, and compromise District operations; and

WHEREAS, the Board of Directors further finds that reasonable, content-neutral restrictions on access to District facilities and operational areas after adjournment are necessary and appropriate to protect public safety and ensure uninterrupted emergency services;

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Alfalfa Fire District adopts the following:

SECTION 1. FINDINGS

1. District facilities are critical infrastructure for emergency response and must remain secure and operational at all times.

2. The District is actively staffed and responds to emergency calls, requiring unobstructed access to apparatus, equipment, and facilities.

3. Both interior facilities and certain exterior areas, including parking areas, driveways, and apparatus access routes, may be necessary for emergency operations and may pose safety risks if occupied or obstructed.

4. The public's right of access under Oregon Public Meetings Law applies during the meeting itself and does not extend beyond adjournment.

5. The District may impose reasonable, content-neutral restrictions on access to its facilities and operational areas to ensure safety, security, and effective emergency response.

SECTION 2. POLICY

Public access to District facilities is limited to the duration of public meetings. Upon adjournment, individuals must promptly exit interior facilities and any restricted operational areas.

Exterior areas, including parking areas and apparatus access routes, may be restricted as necessary to ensure safe emergency operations.

No post-meeting activities shall occur inside District facilities without prior authorization.

SECTION 3. ENFORCEMENT

Individuals remaining in restricted areas after being directed to leave may be subject to trespass enforcement under ORS 164.245.

SECTION 4. EFFECTIVE DATE

This Resolution is effective immediately upon adoption.

ADOPTED this 8 day of APRIL, 2026.

BOARD OF DIRECTORS

Nate Starr, President

Mark Laucks, Vice President

Caroline Chase, Director

Dustin Piggot, Director

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April 27, 2026

Justin Alderman
Prineville Review
jalderman@prinevillereview.com

Re: FORMAL NOTICE OF TRESPASS
25889 Alfalfa Market Road, Bend, Oregon 97701 ("Premises")

Dear Mr. Alderman:

This office represents the Alfalfa Fire District. Based on your violation of Board of Directors Resolution No. 2026-04, attached for your convenience, this letter shall serve as your formal notice of your prohibition to be on the above-referenced premises. Any violations of these prohibitions will be enforceable under ORS 164.245.

You may attend any future public meetings by video or phone. Meeting information may be found at https://www.alfalfafiredistrict.org/meetings.

If you have any questions, please feel free to contact legal counsel.

Best Regards,

Jered Reid
Attorney at Law

Enclosure (per text)

cc: Client
Deschutes County Sheriff's Office
Deschutes County District Attorney

Plaintiff Exhibit 2