

## Christian Wolff, MA

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September 11, 2019

Oregon Governor Kate Brown  
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Salem, OR 97301-4047  
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### **Last Chance Opportunity for Governor Brown to Act: The Rogelio Daniels Matter**

Governor Brown,

Given yesterday's revelations by Ginger McCall, I am given to believe you have given self-protective directives to all your staff. I would think, in lieu of any form of email available for you directly, I could count on emails sent to Stormy Boyles, Executive Assistant to the Governor and Terra Mauseth, Main Governor's Office Reception to relay correspondence to you without inappropriate prejudice. Rather than doubt my own sensibilities on this matter, I am going to hold you accountable for having received any emails I have sent to your direct assistants.

#### **The Daniels Matter Upon Which I Implore You to Act Immediately:**

Approximately 1 year ago, I discovered that an investigator for the Oregon Board of Licensed Professional Counselors & Therapists (OBLPCT) and the Oregon Board of Psychology (OBOP) had been arrested and jailed for Attempted Class B Felony, Coercion (both felonies), Menacing & Strangulation. There were more charges but these were the charges he was convicted of. The (former) OBOP Inspector's name is Rogelio Len Daniels.

Upon my discovery, I sent a letter to the OBLPCT & OBOP, and their "umbrella" organization, the Mental Health Regulatory Agency (MHRA) asking why licensees and the public had not been notified and I demanded they inform licensees & the public immediately. They refused. I then contacted the Oregon Psychological Association

(OPA). I was informed that they were well aware of the matter and were not planning to take any action.

The voting members of all boards in Oregon serve "at the pleasure of the Governor." I suggest you should be displeased with their behavior and lack of action on this matter.

I am asking you, Governor Brown to direct MHRA, OBLPCT, and OBOP to properly disclose to the public and all licensees, the disposition of (former) investigator, Rogelio Daniels. I also ask for an investigation into why these boards refused to disclose this information immediately upon discovery of his crimes. I must insist that you act immediately. Licensees and their families are suffering as we speak.

Many licensees alleged to have committed violations of statutes, rules or professional ethics were investigated by Rogelio Daniels - a person constitutionally capable Coercion, Menacing, and Strangulation. They have a right to know about Daniels so they may weigh this information in relation to the board actions taken against them. Daniels is a "mitigating" factor and the disciplined licensees should have a right to re-challenge board decisions.

Investigative reports by Daniels to the boards appear in the disciplined licensees public profiles which can be easily Googled by anyone and found published on the boards' websites. The highly and inherently suspect nature of Daniels' reports have had defamatory impact upon the licensees. For this reason, I ask you to direct these boards to formally do a news release on the Daniels matter so that friends, family, colleagues, potential employers and the general public may consider the Daniels factor in establishing their regard for the accuseds.

Approximately one year ago, the list of those I reached out to for rightful action on this matter include.

"Dr. Clifford Johannsen" <cjohannsen@comcast.net>,  
Lindsay McGrath <portlandrelationshiptherapy@gmail.com>,  
Warren Foote <warren.foote@doj.state.or.us>,  
FOOTE Warren <warren.foote@state.or.us>,  
ogec.mail@oregon.gov,  
Dennis Richardson <oregon.sos@oregon.gov>,  
help@oregonconsumer.gov,  
Ellen Rosenblum <Ellen.F.Rosenblum@doj.state.or.us>,

psychology.board@oregon.gov,  
rebekah.talley@state.or.us,  
lpct.board@oregon.gov,  
natalie.altermatt@oregon.gov,  
charles.j.hill@oregon.gov,  
laree.felton@oregon.gov,  
terra.mauseth@oregon.gov,  
stormy.boyles@oregon.gov,  
jennifer.j.andrew@oregon.gov,  
info@katebrownfororegon.com,  
kristina.rice-whitlow@oregon.gov,  
katy.coba@oregon.gov,  
INFO Oregon \* DAS <oregon.info@oregon.gov>,  
DAS George Naughton <george.m.naughton@oregon.gov>,  
lisa.upshaw@oregon.gov,  
lc.web@oregonlegislature.gov,  
lc.request@oregonlegislature.gov,  
allison.mcgonagle@oregon.gov,  
David Oliveros <david.oliveros@oregon.gov>,  
rep.knutebuehler@oregonlegislature.gov,  
info@knutebuehler.com

No one responded meaningfully if at all.

In as much as a thorough investigation of this matter may reveal the commission of crimes or opportunities for civil action by those directly affected I issue the following explicit cautions. I have borrowed these cautions from other documents where the cautions have been worded more strongly. I issue these as cautions and as a layperson.

Upon receiving this letter, you are also hereby advised to not to destroy, conceal, or alter any files and other data generated by and/or stored on your computers, phones, and storage media (e.g., hard drives, flash drives, CDs), or any other electronic data. This notice includes, but is not limited to, home computers and laptop computers, e-mail, voicemail, personal digital assistants, cookies, and cache files.

Additionally, this letter covers electronic data created subsequent to the date of this letter. This notice also includes, but is not limited to, all internal communications and all paper or electronic documents relating to or concerning the subject this letter and anything, even in the slightest, foreseeable as related to the matters in this letter.

Your failure to heed these cautions can result in severe sanctions being imposed by the Court for spoliation of evidence or potential evidence, and also may subject you to tort liability.

If crimes or acts likely to be eligible for civil litigation are discovered, you may wish to anticipate that in discovery a number of documents, including files stored on your computers, your computer storage media, and cell phones may be asked for. To avoid spoliation, you will likely need to provide the data requested on the original media. You are advised to not reuse any media to provide this data.

Electronic documents and the storage media on which they reside contain relevant discoverable information beyond that which may be found in printed documents. Therefore, even if a paper copy exists, documents in their electronic form along with information about those documents contained on the media may be sought. Paper printouts of only those documents that contain unique information after they were printed out (such as paper documents containing handwriting, signatures, marginalia, drawings, annotations, highlighting, and redactions) along with any paper documents for which no corresponding electronic files exist may also be sought by parties and their attorneys if there is any litigation.

In the process of discovery, certain data on the backup media used in your computers and cell phones, some of which data are not readily available to an ordinary computer user, such as deleted files and file fragments could also be requested. "Erased" or "deleted" files can be as intact on the disk or other electronic media as any "active" file you would see in a computer directory listing.

Courts have made it clear that all information available on electronic storage is discoverable, whether readily available ("active") or "deleted" but recoverable. *See, e.g., Easley, McCaleb & Assoc., Inc. v. Perry, No. E-2663* (Ga Super Ct 1994) (finding "deleted" files discoverable and allowing expert to retrieve all files); *Santiago v. Miles*, 121 FRD 636, 640 (WDNY 1988) (allowing request for "raw information"); *Gates Rubber Co. v. Bando Chemical Indus., LTD., 167 FRD 90*, 112 (D Colo 1996) (suggesting mirror-image copy of everything on hard drive); *Northwest Airlines v. Local 2000*, Civil Docket Case No 000cv8 (D Minn 2000) (ordering image-copying of home computer hard drives).

To assure that your possible legal obligation to preserve documents and things relating to or concerning the present and all even remotely related matters will

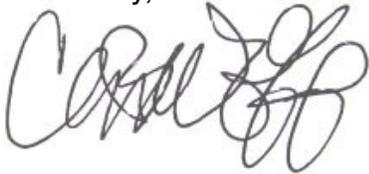
be met, please forward a copy of this letter to any and all persons and entities with custodial responsibility for records and the retention of information.

Governor Brown, writing to you is as much “handling of this matter” as I wish to do. Voting members of Oregon boards “serve at the pleasure of the governor.” When wrong-doing is suspected and reported to you, it is the duty of your office to investigate. Unless you wish to be regarded as actively or passively complicit in that wrong-doing, you will see to it that erring individuals and entities are redirected and that wrongs committed are made right. If the individuals or entities are non-compliant with your (rightful) directives, you must seriously consider removing them from their posts, *post haste*.

I trust you will do your duty as governor to protect the public from rogue, dangerous, self-serving, malevolent, irresponsible, and unethical entities *within* the Oregon executive branch of government.

If I discover you’ve chosen to not take the *immediate* action I have asked of you, it will be incumbent upon me to seek rightful action elsewhere and if I exhaust all of my avenues of meaningful redress inside of Oregon, it will be incumbent upon me to seek action outside the State of Oregon.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christian Wolff', written in a cursive style.

Christian Wolff, MA

Cc:

Mental Health Regulatory Agency (MHRA)

Charles Hill, Executive Director

LaRee Felton, Policy Advisor / Licensing Manager

Oregon Board of Licensed Professional Counselors (OBLPC&T)

Carolyn Alexander, Esq, Board Chair

Lindsay McGrath, LMFT, Board Vice-Chair

Amy Rees, LPC, Board Member

Dave Dalton, LPC, Board Member

Jeff Harman, LPC, Board Member

Marcia Michaels, LMFT, Board Member

Don Thomson, LPC, Board Member

Oregon Board of Psychology

Clifford Johannsen, PhD, Board Chair  
Peter Grover, PhD, Board Vice-Chair  
Bryan Hagen, DNP  
Celeste Jones, PsyD, Board Member  
David Ziegler, PhD  
Janice Schermer, Board Member  
Jon Weiner, Esq, Board Member  
Linda Nishi-Stratner, PhD, Board Member  
Patricia Bjorquist, PhD, Board Member

DoJ-Contracted Legal Counsel for OBOP & OBLPCT (& OMB)  
Warren Foote, JD, SAAG

Healthcare Alliance for Regulatory Board Reform (HARBR)  
All members

Select Press

Full Press Release Pending (Won't be necessary if boards do this themselves)