

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR MULTNOMAH COUNTY

THE STATE OF OREGON,

Case Nos. 19CR53042, 19CR53035,  
19CR53040, 19CR50007, and  
19CR54815.

Plaintiff,

BILL OF PARTICULARS

v.

JOSEPH GIBSON, RUSSELL SCHULTZ,  
MACKENZIE LEWIS, and IAN KRAMER

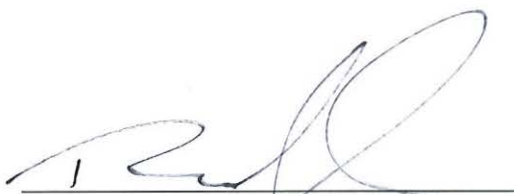
Defendant

Pursuant to a written request by defendant JOSEPH GIBSON, joined by defendants IAN KRAMER, MACKENZIE LEWIS, and RUSSELL SCHULTZ, and in accordance with the order of the court, the State of Oregon submits this Bill of Particulars to state with greater specificity the approximate time at which the above referenced defendants did unlawfully, while participating with 5 or more other persons, begin to engage in tumultuous and violent conduct, thereby creating a grave risk of causing public alarm on or about May 1, 2019. Furthermore, the State of Oregon submits this Bill of Particulars to state with greater specificity the approximate time at which the above referenced defendants ceased engaging in the prohibited conduct on or about the date and time alleged in the indictment. This Bill of Particulars does not list all of the evidence that the government will seek to introduce in support of the charges.

Each of the indictments filed in the consolidated criminal prosecutions of the above listed defendants allege that each specific defendant "... on or about May 01, 2019, in the County of Multnomah, State of Oregon, did unlawfully and knowingly, while participating with 5 or more other persons, engage in tumultuous and violent conduct, thereby intentionally and recklessly

1 creating a grave risk of causing public alarm, contrary to the statutes in such cases made and  
2 provided and against the peace and dignity of the State of Oregon.” The State of Oregon’s theory  
3 of guilt is that the actions committed by each of the above referenced defendants as documented in  
4 Portland Police Bureau report numbers 19-141483, 19-143459, 19-141889, and 19-680568, and as  
5 recorded on video by one or more sources as documented in discovery that the State of Oregon  
6 provided to each of the defendants in accordance with ORS 135.815 and the Oregon and United  
7 States Constitutions, began no earlier and ceased no later than the times referenced in the video  
8 recordings and police reports on or about May 1, 2019.

9 Dated this 30<sup>th</sup> day of June, 2020

A handwritten signature in blue ink, appearing to read 'B. Kalbaugh', is written over a horizontal line.

Bradley Kalbaugh, OSB#074335  
Deputy District Attorney  
Multnomah County

### Certificate of Service

I certify that on June 30, 2020, I caused the foregoing motion to join cases to be served upon the parties hereto by the method indicated below, and addressed as follows:

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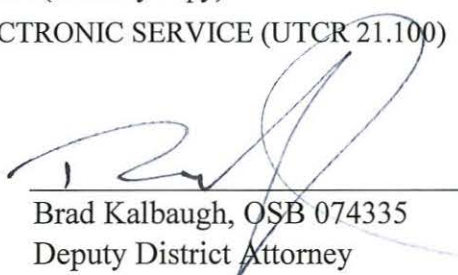
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