



Date: July 7, 2025

To: Hearings Officer

From: Scott & Stacy Reed, Property Owners
12424 NW Springville Road, Portland, OR 97229

Re: Response to Susan & Kirk Andrews email dated June 12, 2025
Public Hearing on Appeal of Case File T2-2021-14981, COA-2025-0004

The purpose of this Memorandum is to summarize Scott and Stacy Reeds' responses to the comments made by Susan and Kirk Andrews in their June 12, 2025 email. The Andrews' email includes four statements. The Reeds' response will track with each of the Andrews' four statements.

1. The Reeds provided the 2020 Schedule F as soon as it was allowed to be filed by our tax attorney. As the Reeds have shared with the County, at the time of the dwelling application in 2021 the Reeds were under a major audit with the IRS. It was their third IRS audit in 10 years. The first two audits were closed out by the IRS with no changes, adjustments, or penalties. But the third audit dragged on until this year when the Reeds went to a four-day trial in tax court in Little Rock, Arkansas. The trial went very well for the Reeds, and we have since been cleared by our tax counsel to file our past draft returns. That is why our 2020 return was not filed until late 2024.

The Reeds have supplied the County with the IRS Schedule F for the farm from 2014 through 2020 (County Website- AA.2 2020 Schedule F_02.13.2025 & HH.6 Reed Schedule F _2014-2019).

2. The Reeds have a large family and plan to build a large house. But the size or cost of the house has nothing to do with the land use question being considered.

3. In September 2021, the County notified the Reeds that Susan Andrews was very upset about the newly issued agricultural fill permit that was issued to the farm. Scott Reed emailed Susan Andrews (sgoldfield@aol.com) on September 3, 2021 and asked "if you have time, I would like to get on a call or meet up and figure out how we can improve our process to lessen the negative impact the temporary topsoil import is having on you. Let me know a good time to talk." Scott Reed never received a reply from Susan Andrews on the email. Scott Reed emailed Susan Andrews again on September 7, 2021 and emailed "I hope you and your family had a great Labor Day weekend. I wanted to follow up on my email from Friday." Scott Reed never received a reply from Susan Andrews on the email. On September 14, 2021, Susan and Kirk Andrews directed their attorney,

Jeremy R. James (Southwest Portland Law Group), to send the Reeds a “cease and desist” letter for the farm causing “extreme levels of dust and noise.” The Reed farm’s attorney, Garrett Stephenson (Schwabe, Williamson & Wyatt, P.C.), reviewed the letter and instructed the Reeds to dismiss the letter based on Oregon’s Right-to-Farm laws which protect against claims by neighbors of dust, noise, and traffic.

3. The Andrews seem to be implying that the Reed’s have falsified their tax returns to the IRS without any shred of proof. This accusation is both serious and baseless. The Reeds have four young children and are not in the practice of breaking the law.