

GREGORY KAFOURY  
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2025000970GL

June 30, 2025

**SENT VIE HAND DELIVERY  
AND FACSIMILE TO 503.823.3089**

Robert L. Taylor, Portland City Attorney  
Portland Office of City Attorney  
1221 SW Fourth Avenue, Suite 430  
Portland, Oregon 97204

**SENT VIA EMAIL TO Liabilityclaims@portlandoregon.gov**

City of Portland  
Risk Management – Liability  
1120 SW 5<sup>th</sup> Ave, Suite 1040-Risk  
Portland OR 97204

**SENT VIA HAND DELIVERY AND  
FACSIMILE TO 503.823.6120**

City of Portland  
Patrick Hughes  
Risk Management Division Manager  
1120 SW 5th Avenue, Suite 1040  
Portland, Oregon 97204

Re: Our Client: Keevin Collier  
DOI: 6/15/2025  
Time: Approximately 2 a.m.  
Location: NW 3<sup>rd</sup> and NW Burnside (Photographs enclosed)

**TORT CLAIMS NOTICE – ORS 30.625, *et seq.***

Greetings:

This is a tort claim notice pursuant to ORS 30.625, *et seq.*

On June 15, 2025, Keevin Collier was walking and stepped into a hole in the sidewalk at NW 3<sup>rd</sup> and NW Burnside, in front of the LifeChange Center, injuring his [REDACTED]

411 SW Second Avenue, Suite 200, Portland, Oregon 97204

Robert L. Taylor, Portland City Attorney  
Portland Office of City Attorney

City of Portland  
Risk Management - Liability

City of Portland  
Patrick Hughes  
Risk Management Division Manager

June 30, 2025  
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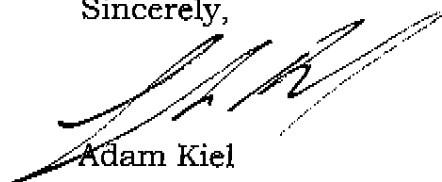
It is unknown at this time who created the hole or how the hole was created. We serve this tort claims notice to investigate if the City of Portland was involved in the creation of the hole. Photographs of the hole are enclosed.

A claim for damages is hereby asserted against the City of Portland; compensation is hereby demanded. Please accept this as a tort claim notice and a demand for compensation against the City of Portland.

The claimant is Keevin Collier. Correspondence for the claim should be addressed to this firm at the address on the letterhead.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Kiel', written over a horizontal line.

AK:dh  
Enclosure

