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**Oregon
Law Center**
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CITY OF PORTLAND
RISK MANAGEMENT

522 SW Fifth Ave.
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Portland, OR 97204
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ejohnson@oregonlawcenter.org

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Office of the City Attorney

Via First Class Mail and Email

September 16, 2022

Robert L. Taylor
~~City Attorney, City of Portland~~
1221 SW 4th Avenue, Room 430
Portland, OR 97204
Robert.taylor@PortlandOregon.gov

Ted Wheeler
~~Mayor, City of Portland~~
1221 SW 4th Avenue, Room 340
Portland, OR 97204
MayorWheeler@PortlandOregon.gov

RE: TORT CLAIM NOTICE SENT PURSUANT TO ORS 30.275

Claimants: Emanuel Displaced Persons Association 2, Gloria Campbell-Cash, Isaac Campbell, Izeal Campbell, Marilyn K. Hasan, Rosie Taylor, Elizabeth Fother-Branch, Bobby Fother, Karen Smith, Alicia Byrd, Brian Morris, Joanne Bowles-Spires, Claude Bowles, Mary Bowles Shoals, Royal Harris, Rahsaan Muhammed, Mike Hepburn, Beverly Hunter, Juanita Biggs, Connie Mack, Travante Franklin, Donna Marshall, Barbara Dumas, LaKeesha Dumas, James Smith, Clifford Tyrone Dumas, and Valda McCauley

Date of Incident: Continuing

Location: Central Albina

Mayor Wheeler and Mr. Taylor:

This office, along with Albies, Stark & Guerriero and Legal Aid Services of Oregon, represents the above-named individuals and organization.

This letter serves as a Tort Claim Notice, pursuant to ORS 30.275, setting forth potential claims that the above-named individuals and organization intend to bring arising from continuing violations related to the Emanuel Hospital expansion urban renewal project.

In the 1960s and early 70s Emanuel Hospital, the City of Portland, and the Portland Development Commission (now Prosper Portland) unlawfully conspired to violate the civil rights of hundreds of Black Portlanders including the above-named individuals. The contours of the conspiracy are just now becoming known, but the result was that hundreds of homes and dozens of businesses were destroyed and hundreds of families were displaced from Central Albina. The publicly stated reason for the destruction was false. The City and PDC claimed that their goal was the removal of "blight" and "urban renewal." The reality was that the city, PDC and Emanuel did not want so many Black people living in the vibrant and economically valuable neighborhood around the Hospital.

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A backroom deal was reached between the City actors and Emanuel that if Emanuel started purchasing property (which they did) in the 1960s, the City would come in and unlawfully engage the powers of urban renewal to finish the acquisition and demolition of the neighborhood (which they did). Decades later, the harm from this illegal conspiracy continues for the descendants and survivors of the displaced families. The above-named individuals are all survivors and descendants of those families. EDPA2 is an organization formed to protect their interests and seek justice for the harmed families. The descendants and survivors continue to be harmed by the loss of their inheritance and the unjust enrichment of the City, Prosper Portland and Emanuel who continue to benefit financially from the illegal destruction of Central Albina.

Much of the publicly stated reason for the mass demolition and displacement – an ambitious hospital expansion – never happened, and much of the land, formerly owned by the above-named individuals' families, sits vacant to this day creating a continuing private and public nuisance.

The above-named individuals and organization intend to pursue their legal rights, including but not limited to claims for unjust enrichment, public nuisance, private nuisance, and other claims for damages, as well as claims under 42 USC §§ 1983 and 1985 for myriad violations of their constitutional rights. Their civil action may include claims for economic, non-economic, and punitive damages, and injunctive and declarative relief. They will also seek to recover all costs and attorney fees associated with the civil action under applicable law.

The above-described facts and claims are set forth for purposes of providing notice pursuant to ORS 30.275 and are not intended to be an exhaustive recounting of all potentially relevant facts and witnesses. The facts and claims detailed above are intended to be construed as broadly as possible.

Sincerely,

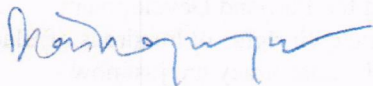
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ALBIES, STARK & GUERRIERO



LEGAL AID SERVICES OF OREGON



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City Attorney, City of Portland
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