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July 28, 2023

**VIA FAX (503)-373-7337, EMAIL
(risk.management@oregon.gov) AND
US MAIL**

**Department of Administrative Services
State Services Division
Risk Management
1225 Ferry Street SE, U150
Salem, OR 97301-4287**

**DMV Headquarters
1905 Lana Avenue NE
Salem, OR 97314**

**VIA FAX 503-988-5758 AND
US MAIL**

**Multnomah County Sheriff
Risk Management
Mail Code 503/4
501 SE Hawthorne Blvd., Suite 400
Portland, OR 97214**

**VIA EMAIL
(riskmanagement@washingtoncountyor.gov) AND US MAIL**

**Washington County Sheriff
155 N First Avenue, Suite 270 MS 11
Hillsboro, Oregon 97124**

**VIA EMAIL
(legalcounsel@co.marion.or.us) AND
US MAIL**

**Marion County Sheriff
Attn: Risk Management
PO Box 14500
Salem, OR 97309**

**VIA EMAIL
(riskmanagement@clackamas.us) and
US MAIL**

**Clackamas County Risk Management
2051 Kaen Road
Suite 310
Oregon City, OR 97045**

**VIA FAX 503-823-6120, EMAIL
(liabilityclaims@portlandoregon.gov)
AND US MAIL**

**City of Portland
Risk Management/Liability
1120 SW 5th Ave, Suite 1040
Portland, OR 97204-1912**

**Yamhill County
Risk Management
535 NE 5th Street
McMinnville, OR 97128**

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VIA EMAIL
(claudia.cisneros@mcminnvilleoregon.gov) AND US MAIL

City of McMinnville
City Hall
230 NE Second Street
McMinnville, OR 97128

VIA EMAIL
(Jeff.Towery@mcminnvilleoregon.gov) AND US MAIL

The City Manager's Office
City Hall
230 NE 2nd Street
McMinnville, OR 97128

Subject: Notice of Tort Claim - ORS 30.275
Claimant: Hans Wulf

Dear Sir or Madam:

This firm represents Hans Wulf. This letter serves as formal notice that a claim for false arrest and negligence is or will be asserted against the Sheriff's Offices of the Counties of Multnomah, Marion, Washington, Clackamas, and Yamhill, the Oregon DMV, and the State of Oregon.

The attached records show the Oregon DMV mistakenly had Mr. Wulf's license status as "criminally suspended." This led to numerous false arrests and false charges. *See attached Correspondence and OJCIN printout.*

There was also a false arrest in the County of Yamhill, City of McMinnville. These false arrests were not discovered to be false until written admissions were sent by the district attorney's office.

My client has spent approximately 158 days in jail as a result of the false arrests. He lost wages during that time. In addition, Mr. Wulf had various amounts of bail moneys not returned, particularly in the **County of Yamhill, City of McMinnville**. Demand is made that his bail money in full be returned immediately.

For his pain and suffering and lost wages during the 158 days he spent in jail based on false arrests, we estimate my client's pain and suffering to be **\$100,000**. Additionally, we believe his lost wages would be approximately **\$63,200**, and bail money, and any license fees he may incur. Finally, my client's vehicles were towed which he could not retrieve due to the false license suspension. Those vehicles totaled **\$22,200**.

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Therefore, you are on notice of this Tort Claim. Demand is made that you compensate Mr. Wulf for pain and suffering, lost wages, vehicles, bail moneys, and fines incurred due to your actions. The economic loss is ***\$85,400*** and noneconomic loss is ***\$100,000***, for a total loss of ***\$185,400***. You have records of the fines and bail moneys not returned. We request a complete accounting and reimbursement of those moneys. Please send any correspondence concerning this claim to this office.

Sincerely,

/s/ Jonathan H. Johnson

Jonathan H. Johnson

CC: Hans Wulf