

2024-015380-28

2024-015381-28

Mr. Renee Stephens
Mrs. Karellen Stephens
7135 SW 54th Ave
Portland, OR 97219

Occurrence 202-40873

503-607-3422; 503-544-2166

Date: May 28, 2024

Sent via Certified Mail

To:

Office of the City Attorney
City of Portland
1221 SW 4th Ave, Suite 430
Portland, OR 97204

And

Office of County Counsel
Multnomah County
501 SE Hawthorne Blvd, Suite 500
Portland, OR 97214

And

Portland Police Association
P.O. Box 11314
Portland, OR 97211

And

Lt. Jake Jensen
Portland Police Bureau
1111 SW 2nd Ave
Portland, OR 97204

And

Multnomah County District Attorney's Office
1200 SW 1st Ave, Suite 5200
Portland, OR 97204

And

Office of the Mayor
Mayor Ted Wheeler
1221 SW 4th Ave, Suite 340
Portland, OR 97204

RE: Notice of Tort Claim for Malicious Prosecution, Defamation, Race Discrimination, and Intentional Infliction of Emotional Distress

Dear Sir/Madam,

Pursuant to the Oregon Tort Claims Act (ORS 30.260 to 30.300), this letter serves as formal notice of our claim against the City of Portland, Multnomah County, the Portland Police Association, Lt. Jake Jensen, the Multnomah County District Attorney's Office, and Mayor Ted Wheeler for malicious prosecution, defamation, race discrimination, and intentional infliction of emotional distress. We, Renee and Karellen Stephens, are notifying you of our intent to seek legal redress for the damages we have suffered as a result of the wrongful actions of your employees and agents.

Claimants:

- Renee Stephens
- Karellen Stephens

Incident Details:

- **Date of Incident:** Ongoing from April 12, 2007, culminating in wrongful charges dismissed on May 6, 2024
- **Location:** Portland, Oregon

Background:

On April 12, 2007, our daughter, Qadira Stephens, was the victim of a crime involving severe burn injuries inflicted by Todd Burkholder and Aimee McQuiston. Despite their admissions, they were not held accountable due to what appears to be a cover-up involving multiple parties, including Portland City Officials and related entities.

We have been vocal in protesting government corruption and the mishandling of our daughter's case. In retaliation, we were charged with 19 counts of disorderly conduct II for allegedly making unreasonable noise during our protests. These charges were baseless and aimed at silencing our advocacy. On May 6, 2024, these charges were dismissed with a general dismissal.

Furthermore, Portland City Officials, including the Portland Police Bureau and the Multnomah County District Attorney's Office, falsely claimed to have conducted a thorough investigation

into the abuse of our daughter, Qadira Stephens. In reality, no proper investigation was conducted, and the city's false statements have contributed to the ongoing injustice and cover-up.

Additionally, Mayor Ted Wheeler publicly referred to us as "jerks" during a City Council meeting, which was broadcast to the public, further damaging our reputation.

Claims:

1. **Malicious Prosecution:** The charges brought against us lacked probable cause and were motivated by malice, intending to suppress our First Amendment rights and protect individuals involved in the cover-up of the crimes against Qadira.
2. **Defamation:** Throughout this process, false and damaging statements were made against us, significantly harming our reputations within the community and beyond. This includes the public statement made by Mayor Ted Wheeler.
3. **Race Discrimination:** As people of color, we were subjected to harsher treatment and more severe charges compared to our white counterparts in similar situations. The discriminatory actions were evident in the way our case was handled, reflecting a pattern of racial bias and unequal treatment.
4. **Intentional Infliction of Emotional Distress:** The actions of your employees and agents were extreme and outrageous, intentionally causing severe emotional distress. The baseless charges, public defamation, and discriminatory treatment have caused us profound emotional suffering and mental anguish.
5. **False Statements Regarding Investigation:** The City of Portland, the Portland Police Bureau, and the Multnomah County District Attorney's Office falsely claimed to have conducted a thorough investigation into the abuse of our daughter, Qadira Stephens. These false statements have caused additional emotional distress and have perpetuated the cover-up of the crimes against her.

Damages:

As a result of the malicious prosecution, defamation, race discrimination, intentional infliction of emotional distress, and the false statements regarding the investigation into Qadira's abuse, we have suffered:

- Emotional distress and mental anguish
- Damage to our reputation and standing in the community
- Financial losses, including legal expenses
- Impairment of our ability to continue our advocacy work

Notice Requirements:

This notice is being submitted within the statutory period required under the Oregon Tort Claims Act. We request that you initiate an investigation into this matter and respond to this notice within the time frame stipulated by law.

Resolution Sought:

We are seeking:

- A formal apology from the City of Portland, Multnomah County, the Portland Police Association, Lt. Jake Jensen, the Multnomah County District Attorney's Office, and Mayor Ted Wheeler
- Compensation for the emotional distress, reputational harm, and financial losses incurred
- Acknowledgment and redress of the racial discrimination we faced
- Public admission from the Portland Police Bureau, the City of Portland, and the Multnomah County District Attorney's Office that no thorough investigation was conducted into the abuse of Qadira Stephens
- Policy changes to prevent such actions from occurring to others in the future

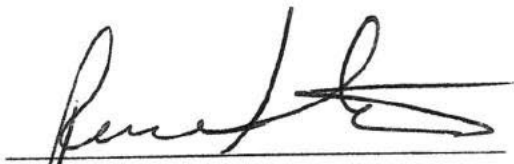
Contact Information:

Please direct all correspondence regarding this claim to:

- Renee Stephens and Karellen Stephens
- 7135 SW 54th Ave., Portland, OR 97219
- [REDACTED]
- 503-607-3422; 503-544-2166

We look forward to your prompt response to this serious matter.

Sincerely,



Renee Stephens

Karellen Stephens

CC:

- Multnomah County Board of Commissioners