

2024-015440-29

RR HCMG 2880 / 2884 + 2903 ✓



CHRISTINA E. STEPHENSON
Labor Commissioner

June 17, 2024

CITY OF PORTLAND
900 SW 4TH AVE STE 7007
PORTLAND, OR 97201

RECEIVED

JUN 21 2024

CITY OF PORTLAND
RISK MANAGEMENT

RE: BOLI Case No. STHODP240613-10554
BOLI File No. 24-05856

To Whom It May Concern:

The above-cited complaint, alleging one or more unlawfully discriminatory housing practices, was officially filed on June 13, 2024 with the State of Oregon, Bureau of Labor and Industries (BOLI) under ORS Chapter 659A. In the investigation of this complaint, the person who filed the complaint is referred to as "Complainant." Each person that the complaint is filed against is referred to as a "Respondent." BOLI is governed by state law which sets out BOLI's jurisdiction and authority to investigate a formal complaint. A copy of the complaint is enclosed herein.

RESPONDENT(S): YOU MUST SUBMIT A WRITTEN ANSWER TO THIS COMPLAINT WITHIN 10 CALENDAR DAYS OF RECEIPT OF THIS LETTER. The answer must be signed and each Respondent must affirm that they have given a truthful response by including the statement: "*I declare under penalty of perjury that the foregoing is true and correct.*"

SEND YOUR POSITION STATEMENT TO: ATTN: Michael Sterner
1800 SW 1st Ave, Suite 500
Portland, OR 97201
Or, via email to: [REDACTED]
Or, via fax: 971-353-7162

Please read the enclosed material on the response process. Additional information can also be found on our website at <http://www.oregon.gov/BOLI/CRD/pages/index.aspx>

A respondent can, with the agreement of BOLI, amend an answer at any time during the investigation.

Conciliation

BOLI encourages complainants and respondents to resolve complaints by mutual agreement. BOLI can facilitate settlement negotiations between the complainant and respondent at any time during the investigation.

Investigation

In handling this complaint, BOLI will conduct an *impartial* investigation of all claims that unlawful housing discrimination has occurred. If the investigation indicates that there is not evidence establishing jurisdiction, the case will be dismissed. At any point, you can request that BOLI staff facilitate a conciliation (or settlement) of this complaint. If conciliation is unsuccessful, BOLI will complete the investigation and determine whether or not there is substantial evidence indicating that there has been a fair housing violation.

Determination



If the investigation determines that there is substantial evidence to believe that an unlawful discriminatory housing practice has occurred and the matter is not otherwise resolved, BOLI will review the case to determine whether to issue a formal charge. If the investigation indicates there is less than substantial evidence supporting reasonable cause to believe that discrimination has occurred, the complaint will be dismissed. In either event, you will be notified in writing.

Civil Action

Even if BOLI dismisses this complaint, the complainant may still have the right to file a civil action in circuit court. See ORS 659A.875(3) and ORS 659A.885. Complainants may contact the U.S. Department of Housing and Urban Development at 800-877-0246 regarding time limitations under the federal Fair Housing Act. There may be other applicable federal, state or local statutes under which a complainant may initiate court action. Complainants may consult a private attorney in this regard.

Retaliation

ORS Chapter 659A makes it unlawful for a respondent or anyone else to coerce, intimidate, threaten, or interfere with a complainant in the exercise or enjoyment of any right granted or protected under those laws. The laws also make it illegal for anyone to coerce, threaten or interfere with a complainant for having aided or encouraged any other person in the exercise or enjoyment of any right or protection granted to them under the applicable fair housing laws.

Contact

The investigation of this complaint has been assigned to Senior Investigator Michael Sterner. If you have any questions, please contact the investigator at 971-353-7162 or Michael.Sterner@boli.oregon.gov. Please refer to the case number at the top of this letter each time you contact BOLI.

Please keep this office advised of any change of your address or telephone number.

Sincerely,

CIVIL RIGHTS DIVISION

Portland Office

Bureau of Labor and Industries

cc: Sia Rezvani, Respondent's Attorney
City Of Portland, City Attorney, Respondent's Attorney
Rosalia Radich, Respondent Headquarters
Bridge Housing Corp., Additional Respondent
Courtney Brown, Additional Respondent
Impact Nw, Additional Respondent

Housing Discrimination Complaint

BOLI Case Number: STHODP240613-10554

BOLI File Number: 24-05856

1. Complainants:

Marcie Knudson

2. Complainant Representatives:

N/A

3. Other Aggrieved Parties:

N/A

4. The following is alleged to have occurred or is about to occur:

- Terms and conditions relating to rental and occupancy.
- Accessibility.

5. The alleged violation occurred because of:

- Disability
- Source of Income

6. Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):

The Vera Riverplace
2045 S River Pkwy.
Portland, OR 97201

7. Respondents:

Property Owner-
City of Portland
900 SW 4th Ave., Ste. 7007
Portland, OR 97201

Property Manager –
Bridge Housing Corp.
1631 NE Broadway PMB #153
Portland, OR 97232

Courtney Brown
2045 S River Pkwy
Portland, OR 97201

Respondent Attorney-
Sia B. Rezvani
Warren Allen, Ltd.
10535 NE Glisan St.
Portland, OR 97220

Housing Services Provider-
Impact NW
PO Box 33530
Portland, OR 97292

8. The following is a brief and concise statement of the facts regarding the alleged violation:

I reside at The Vera, 2045 S River Pkwy., Portland, OR 97201. My rent is paid with the assistance of a place-based housing voucher. I have one or more mental or physical impairments which substantially limit one or more major life activities.

I moved into a new apartment at The Vera on February 20, 2024. On March 5, I informed property management that the apartment had smoke damage. On March 15, 2024 manager Courtney Brown verbally told Knudson that nothing was done for smoke mitigation before turning over possession of the apartment to Knudson. The onsite manager acknowledged that it had not been cleaned. I have been waiting on Bridge Housing to clean the apartment. When my respiratory problems became severe, I could no longer stay in the apartment. I evacuated the premises on May 8, 2024. During the time I resided in the new apartment, I made a minimum of 10 maintenance requests, of which some have been completed and other major repairs have not. I am in need of a safe place to stay while the apartment is cleaned properly. I requested safe lodging either at The Vera or at another location while the apartment is cleaned, and the smoke damage mitigated by repainting and recarpeting. Bridge Housing has so far not provided substitute housing.

Management provided a contract for painting and moving personal property. I refused to sign because the contract stated that I would be liable for any damage to property. In addition, all the carpet needs to be removed from the apartment and both bedrooms because it is holding smoke odor and particles. The walls and ceiling throughout need to be repainted with smoke abatement paint. The painting contract did not state this type of paint would be used. After several weeks in the apartment, my personal property was infused with cigarette smoke smell. Now my personal property will need to be moved out and cleaned by a special smoke mitigation service.

The Vera is affordable supportive housing. Impact NW is nominally the supportive housing provider onsite. Impact NW has not communicated basic information or advocated on

my behalf to the property management. Impact NW offered to provide certain services such as moving assistance or cleanup assistance. This offer began in April 2024, but Impact NW failed to provide support or information. To date, Impact NW has provided no financial or in-kind assistance related to the smoke-damaged apartment.

In addition, there are problems with building access. The Vera and/or Bridge Housing Property Management is claiming that painted cross-hatches for wheelchair access are designated as employee parking spaces. On-site manager regularly uses this illegal parking herself. The issue is continuing and ongoing. Use of these spaces for employee parking which is currently blocking access to emergency exits and elevators. Due to my disability, this presents a particular danger to my physical safety.

In addition to the items listed above, Bridge Housing Property Management and The Vera and Impact NW have all demonstrated a history of refusing to provide accessible documents for blind persons. The discrimination also includes property management refusing to allow Braille and/or tactile labeling in the laundry room on washing and drying machines, as well as refusing to allow tactile or Braille labeling on common area range top and oven.

I believe that the property manager, their onsite staff and housing services provider Impact NW are discriminating against me on the basis of my disability and my source of income—knowing that I have limited options to move to another property because of my place-based voucher.

9. The most recent date on which the alleged discrimination occurred:

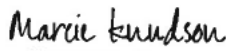
On-going

10. The acts alleged in this complaint, if proven, may constitute a violation of the following sections:

ORS 659A.421; 659A.145; 659A.425.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.

DocuSigned by:

0315A292E61F47B...

6/12/2024

Marcie Knudson

Date



CHRISTINA E. STEPHENSON

COMMISSIONER OF THE BUREAU OF
LABOR AND INDUSTRIES

SUITE 200
1400 EXECUTIVE PKWY
EUGENE, OR 97401-7103

PORTLAND OR RPDC 972

17 JUN 2024 PM 6 L

ADDRESS
SERVICE

REQUESTED

06/17/2024

US POSTAGE

\$001.39⁰



ZIP 97401
011E10670698

Rosalia Radich
City Of Portland, Omf Bureau Of Revenue &
Financial Services, Risk Management
1120 Sw 5Th Ave Rm #1040
Portland, OR 97204

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RISK MANAGEMENT

97204-192699

