



GENERAL LIABILITY CLAIM AGAINST THE CITY OF PORTLAND

* for damages to persons or property *

OCC2024000098

File Number:

2025000296GL



A claim must be filed with City of Portland Risk Management within 180 days after the occurrence of the incident or event.

Normal business hours: Monday through Friday, 8:00am to 5:00pm. Closed on official holidays.

Claims received during regular business hours will be recorded on the date received.

Faxed or emailed claims received after business hours will be recorded on the next working day.

Please be sure your claim is against the City of Portland, not another public entity.

Where space is insufficient, please use additional paper and identify information by section number and letter.

Completed forms may be mailed, emailed, faxed, or hand-delivered to:

Risk Management/Liability, 1120 S.W. 5th Ave., Suite 1040, Portland, OR 97204-1912, Ph: 503-823-5101,

Fax: 503-823-6120 LiabilityClaims@portlandoregon.gov

1. Claimant (Circle: Mr. Mrs. Ms. Miss) JENNIFER HART Date of Birth [REDACTED]

a. Address 38200 SE LUSTED RD City BORING State OR Zip 97009

b. Home Phone — Business Telephone — Cell Phone 503-467-8733

c. Occupation RETIRED d. Marital Status: Single () Married () Divorced or Widowed ()

If married, name of spouse —

d. E-mail address [REDACTED]

2. If claim involves a vehicle: a. Year, make and model 2018 Toyota Four Runner TRD OFF ROAD

b. License Plate Number [REDACTED] Driver's License Number [REDACTED] State OR

c. At time of accident, were you (check all that apply) Owner: — Driver — Passenger ✓ N/A —

d. Name and address of owner if different from claimant (1. Above) —

3. Occurrence or event from which the claim arises:

a. Date 9 JANUARY, 2025 VARIOUS 2024 Time 11:58 am Circle AM / PM

b. Place (exact and specific location) DODGE PARK BLVD (between Altamir Rd + Cottrell Rd)
GRESHAM. THIS IS DUE TO PWB FILTRATION PROJECT CONSTRUCTION.

c. Specify the particular occurrence, event, act, or omission by the City that you believe caused the injury or damage (use additional paper if necessary): PWB HAS BEEN HAULING DIRT OFF FILTRATION SITE (840 PLUS TRUCK LOADS A DAY.) THEY HAVE BEEN NEGLIGENCE OF KEEPING DODGE PARK BLVD CLEAN. THERE HAS BEEN MUD, DIRT, AND ROAD DEBRIS (DUE TO TRUCKS DRAGGING THE ROAD) FROM THE HAULING.

d. State how the City of Portland or its employees were at fault: HEARINGS OFFICERS DECISION POR T-3-2022-16220 SEE SECTION D.6.i page 80:
(SEE ADDITIONAL PAPER)

e. Were you on the job at the time of the accident? Yes — No X

If yes, what is the name / phone number of employer —

4. **Description:** Describe the injury, property damage or loss so far as is known at the time of this claim. _____

RUNNING BOARDS - NO LONGER GO UP, AND ARE ALL SCRATCHED UP DUE TO ROAD DEBRIS. DIRT AND DEBRIS (ROAD) STUCK TO VEHICLE, RUINING MY

5. ***We are required to report all claims for injuries to Medicare/Medicaid Services***

CUT/BUFF/CERAMIC COATING + RUNNING BOARDS.

If you were injured please provide the following: Social Security #: _____

Medicare/Medicaid Beneficiary? Yes ___ No ___

6. **Give the name(s) of the City employee(s) and/or City Bureau causing the damage or injury** _____

Notified Bonita Oswald PWB

7. **Name and address of any other person injured** _____

8. **Name and address of the owner of any damaged property if different from claimant** _____

9. **Damages claimed:**

a. Amount claimed as of this date:

\$ \$ 4544⁰⁰

b. Estimated amount of future costs:

\$ (LAWYER FEES IF WE NEED TO FILE WITH COURTS)

c. Total amount claimed:

\$ _____

d. Basis for computation of amounts claimed (include copies of all bills, invoices, estimates, etc.): _____

ESTIMATE TO FIX VEHICLE IS \$4544⁰⁰

10. **Names, addresses / phone #s of all witnesses** CHRIS HAWES - 14400 SE HOLLYVIEW CT.

DAMASCUS, OR 97089 (971)-244-2045

11. **Any additional information that might be helpful in considering your claim** I HAVE MADE

NUMEROUS COMPLAINTS TO TOM ROBERTSON (PWB CONSTRUCTION CONTRACTOR) AS WELL AS MULTNOMAH County Code Compliance Lot About Dodge Park Blvd being filthy and the mud/dirt/debris. EVERY TIME I DRIVE THAT ROAD MY VEHICLES ARE FILTHY, DUE TO THE DIRT HAULING.

WARNING: IT IS A CRIMINAL OFFENSE TO FILE A FALSE CLAIM! (ORS 162.085)

I have carefully read the statements made in this claim, including any attached sheets, and I know them to be true of my own knowledge, except as to those matters stated upon information or belief and to such matters I believe the same to be true. I understand and acknowledge that all statements made in this claim are made to a public servant of the City of Portland, and that the statements are in connection with an application for a benefit from the City of Portland.

Date: 20 JAN, 2025

[Signature]
Claimant's Signature

JENNIFER HART
Print Name

3. c. I drive Dodge Park Blvd. regularly. The dirt and destruction of the road has been horrible. I am unable to keep my cars clean as for if I wash them they will be dirt the next time I drive Dodge Park Blvd. Christmas Day my running boards will no longer go up. I tried to clean them and silicone the the pivots. To no avail. I have complained a lot about the mud and large pieces of road debris on the road to the County and to the Contractor since before Thanksgiving. Nothing has been done until January 9, 2025. PWB and their Contractor obviously got in trouble by the County for the dirt on Dodge Park Blvd. So they decided to wash the road while continuing the massive truck traffic at the same time. Chris and I were behind a super dump truck. In front of the super dump truck was a water truck spraying water every direction. Muddy water all over road, dump trucks, and my four runner. I spent 2 hours pressure washing my four runner when I returned home. The dirt and grime would not come off. I have not attempted to wash my vehicle, as for it is going to scratch. Needs to be done by a professional. In April 2024, I spent \$1500, to have my four runner cut/buffed/ceramic. I have never had an issue with my running boards, until the road has been muddy. Now they no longer work and are scratched from the road debris, dirt, and mud. My Four Runner has 34,000 miles. Why would PWB clean the road while continuing truck traffic???? I am not the only person complaining about the dirt and damage to the roads and that has damage to personal property. Attached pictures

D. Condition of Approval-

below is an excerpt from the "conditions of approval" included in the Hearing Officer's decision for T-3-2022-16220.

See section D.6.i. page 80:

"i. If not already accomplished through the work described in a. - h. above, for any roads used as a primary or detour through truck haul route, the **Water Bureau will:**

(a) maintain the route in a serviceable condition at any time when being used as a primary or detour through truck haul route; and

"Serviceable condition" means the roadway is safely usable for the purpose for which it was constructed (i.e., potholes are repaired timely, striping can be seen, etc.)."

PWB has not been a "GOOD NEIGHBOR" ! They have been negligent with dirt on the roads and destroying the roads. They are self serving!





