



2025000809LAW

----- PLEASE FORWARD TO COUNSEL & INSUROR IMMEDIATELY-----

May 19, 2025

Via Facsimile, First Class Mail, and Electronic Mail

City of Portland
Attn: Risk Management
1120 SW 5th Avenue, Unit 709
Portland, OR 97204

Re: Tort Claim Notice

To Whom It May Concern:

My office represents Justin Knapp. Mr. Knapp has several potential federal and state law claims against the City of Portland ("City"). His claims are based on the tortious actions of Portland Police Bureau Officers who on May 25, 2024, unlawfully arrested Mr. Knapp and booked him into Multnomah County custody.

Pursuant to ORS 30.275 please consider this formal notice of Mr. Knapp's intent to file a civil claim for monetary damages against the City, including but not limited to the officers who performed these tortious actions. **Additionally, if the City has not already preserved documents and/or recordings regarding this incident, electronic or physical, we demand that these be preserved for future litigation.**

On May 25, 2024, Mr. Knapp was riding his bicycle on 82nd Avenue. Under no construction of these facts could a reasonable officer have formed probable cause to arrest and detain Mr. Knapp, but police pursued Mr. Knapp for several blocks regardless. Police pursued Mr. Knapp in their vehicles and pulled directly in front of a still in motion Mr. Knapp, causing Mr. Knapp to flip over the handlebars of his bicycle as he was entering the parking lot of the IHOP restaurant at 4931 SE 82nd Avenue. As Mr. Knapp got up and turned around, Officer Budworth exited the police vehicle and fell in front of Mr. Knapp. Mr. Knapp bumped into Officer Budworth as Officer Budworth was already falling towards the ground.

Officer Raphael, with assistance from Officer Burn, arrested Mr. Knapp in front of the Tobacco Town at 4860 SE 82nd Avenue. After Mr. Knapp was arrested, he was booked into and held in Multnomah County custody. Mr. Knapp remained in custody from on or around May 25, 2024 to on or around November 21, 2024. During this time, Mr. Knapp missed months of crucial

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<http://www.ojrc.info>

bonding time with his infant daughter, who was born five days before Mr. Knapp's imprisonment. Mr. Knapp suffered emotionally, mentally, and physically from this ordeal. Officers Budworth and Raphael grossly misrepresented what had occurred on May 25, 2024 to a Multnomah Grand Jury, in their reports, in their affidavits, and in open Court during hearings that followed Mr. Knapp's prosecution. Because of their lies, Mr. Knapp was prosecuted for crimes he had not committed. The State of Oregon dismissed all criminal charges against Mr. Knapp on March 7, 2025. Portland Police Bureau Officers lacked reasonable suspicion to arrest Mr. Knapp, which led to his false imprisonment until November 21, 2024.

Because of these tortious acts, Mr. Knapp intends to file a civil action against the City and its actors if no settlement can be reached. His claims include but are not limited to false imprisonment, assault and battery, intentional/negligent infliction of emotional distress, and unlawful search and seizure, as well as 42 U.S.C § 1983 for violations of his Fourth and Fourteenth Amendment rights, and any additional claims that could be reasonably deduced from these allegations. My office is continuing to investigate this issue, and Mr. Knapp retains the right to additional claims as they come to light. The above facts and claims are to be construed as broadly as possible.

At your earliest convenience please forward notice of receipt of this notice. Thank you for your anticipated cooperation in this matter.

Sincerely,



Juan C. Chavez
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Oregon Justice Resource Center
Attorney at Law

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