



----- PLEASE FORWARD TO COUNSEL AND INSURER IMMEDIATELY -----

May 29, 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: Julie Mikela Winters - **Tort Claim Notice**

To Whom It May Concern:

This letter serves as a Tort Claim Notice, pursuant to ORS 30.275, on behalf of Julie Winters for claims arising from the actions or inactions of Portland Police Bureau, The City of Portland, and its employees. Ms. Winters has several potential federal and state claims based on the tortious actions of Portland Police Bureau officers on December 8, 2024.

On or around December 8, 2024, Ms. Winters was involved in a single-vehicle accident near the 2300 block of NW Wilson Street. Ms. Winters was being assisted by a public safety specialist, and she requested that the public safety specialist call the police for additional help. When police arrived, they declined a courtesy transport for Ms. Winters.

Ms. Winters' interaction with the responding officers ended in excessive and unjustified use of force against her. Officer Freund, Officer Vasend, and Officer Torres battered Ms. Winters to the extent that [REDACTED] and required immediate transport to Emanuel Hospital.

Portland Police Bureau Officers' unjustified use of force against Ms. Winters led to severe physical and emotional injuries. Ms. Winters was [REDACTED]. Ms. Winters also continues to experience severe emotional distress since the incident. These injuries have negatively impacted her ability to work, care for herself, and participate in things she enjoys.

Ms. Winters intends to pursue any and all legal claims, including but not limited to claims for assault, battery, intentional and negligent infliction of emotional distress, and negligence, and 42 U.S.C § 1983 for violations of her First, Fourth, and Fourteenth Amendment rights. Ms. Winters' civil action may include claims for economic and non-economic damages,

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and she may also seek to recover all costs and attorney fees associated with any civil action under applicable law.

The above-described facts and claims are set forth for the purpose of providing notice pursuant to ORS 30.275 and are not intended to be an exhaustive recounting of all potentially relevant facts and witnesses. The facts and claims detailed above are intended 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,

A handwritten signature in black ink, consisting of a stylized 'J' and 'C' followed by a horizontal line.

Juan C. Chavez, OSB #136428
Director, Civil Rights Project

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