

# ALBIES & STARK

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*Via First Class Mail and Email*

August 4, 2025

City of Portland  
c/o City Attorney's Office  
1221 SW 4th Avenue  
Portland, OR  
cityattorneyoffice@portlandoregon.gov

Portland Fire & Rescue  
Chief Lauren Johnson  
55 SW Ash Street  
Portland, OR  
chief@portlandoregon.gov

## **TORT CLAIM NOTICE PURSUANT TO ORS § 30.275**

Notice:	A claim for damages will be asserted against City of Portland, Fire & Rescue and any other employees involved in the actions described herein
Claimant:	Sarah Callegari Hall
Date of Incident:	March 2024 to the present, ongoing
Location:	Portland, Oregon

Dear Attorney Taylor and Chief Johnson:

I represent Sarah Hall regarding her employment and civil rights claims for damages against City of Portland Fire & Rescue ("PF&R" or "the City") related to her employment.

This letter serves as a Tort Claim Notice, pursuant to ORS 30.275, to place the City on additional notice that Ms. Hall intends to pursue her legal rights, including claims for money damages, injunctive relief, punitive damages, and equitable remedies, including but not limited to gender discrimination and any applicable constitutional rights, substantive and procedural due process rights, and liberty interests, arising from and related to her employment with PF&R.

### **I. BACKGROUND**

Sarah Hall has over 25 years of combined experience as a firefighter and a paramedic, as well as a degree in applied fire sciences. Since 2022, Ms. Hall has been the Oregon representative for the Women in Fire organization.

In March 2024, PF&R hired Ms. Hall into a lateral firefighter position. On or around March 28, 2024, she began her training at PF&R's Training Academy Center ("TAC"). TAC operates four days a week with ten-hour training sessions each day. Recruits are required to meet benchmarks at TAC in order to advance to training at Station 2, where they respond to emergency calls and continue daily training.

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While entry-level recruits complete a six to eight-month training program, lateral hires follow an accelerated five-month training program. Ms. Hall, who at the time had more than 25 years of experience as a firefighter with other municipal agencies, entered into the lateral position based on her qualifications and prior service.

During her time at TAC, Ms. Hall received positive evaluations reflecting her competence and leadership and scored well on the training tests. On or around April 29, 2024, she received a Recruit Firefighter Monthly Probation Report covering the period from March 28 to April 27, 2024. The report marked all performance categories as acceptable. A second probation report, dated May 30, 2023, covering April 28 to May 27, 2024, again rated nearly all categories as acceptable, with her performance on written exams marked as superior.

Among other things, TAC trainers' written comments included that Ms. Hall demonstrated "a lead by example mentality," that she "consistently [acted] as a source of support and advocacy for her fellow recruits," and "showed a level of self-awareness making her able to change her behavior in order to adapt to unforeseen challenges." The report and TAC trainers confirmed that Ms. Hall met all of PF&R's threshold requirements and benchmarks without issue.

In addition to her written evaluations, Chrisine Pezzulo, a Firefighter Specialist with over two decades of experience at PF&R, and who had directly trained Ms. Hall at TAC, provided a detailed account of Ms. Hall's performance. According to Ms. Pezzulo, Ms. Hall "hit the ground running," consistently demonstrated her advanced skills, and often taught or guided other recruits. Ms. Pezzulo described Ms. Hall's performance as "above and beyond," with no concerns regarding her physical strength, technical ability, or readiness. TAC's evaluation of Ms. Hall was that she had "zero deficiencies in skills, abilities, or knowledge." Ms. Pezzulo also specifically confirmed that Ms. Hall showed no issues donning equipment or performing any physical tasks, including strength-based exercises.

In approximately June 2024, Ms. Hall began the next phase of her training at PF&R's Station 2, where her treatment and experience dramatically changed. At the time, PF&R Captain Aspen Breuer led Station 2 training. Almost immediately upon her arrival at Station 2, and throughout the duration of that training, Captain Breuer subject Ms. Hall to hostile and discriminatory treatment. For example, he repeatedly isolated her, cornered her, and yelled that she "did not belong" at PF&R. He berated her both in private and in front of others.

Captain Breuer engaged in this inappropriate conduct while additionally subjecting Ms. Hall to double standards and unfair criticism. For example, in one instance, he screamed at her, pointed a finger into her chest and demanded to know how she could have transferred laterally while failing "basic tasks." His actions caused Ms. Hall obvious distress, but she continued performing her duties. As another example, when Ms. Hall and a male recruit reported to Captain Breuer without their axes, Captain Breuer wrote Ms. Hall up for it but allowed the male recruit to go retrieve an axe without incident. As another example, during an axe drill, Ms. Hall followed protocol by assisting her partner with a tool hand-off and completed the correct ladder steps. Despite her compliance, Captain Breuer wrote her up for "not being prepared" and for "using her partner's equipment," even though the task required shared use of tools. As another example, during one encounter, Captain Breuer screamed at Ms. Hall words to the effect that if he or anyone else asked Ms. Hall something, "the only words out of your fucking mouth are yes or no." To Ms. Hall's observations, Captain Breuer did not treat male recruits in the same way.

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Under Captain Breuer, Ms. Hall and the only other female recruit were never scheduled to work together on the same rig assignment, even though it was supposed to be a rotating shift. For example, for each shift assignment, two recruits were assigned to Engine 2 and two recruits were assigned to Truck 2. However, Ms. Hall and the only other female recruit were never assigned to positions together on the same apparatus, even though the rotating assignments regularly included all-male assignments and same male recruits working together on the same apparatus. When Ms. Hall raised her concern about this discriminatory practice to another trainer and apparatus operator, he confirmed that it was unusual and allowed Ms. Hall and the other female recruit to be assigned together when he had responsibility over that shift assignment.

In approximately late July 2024, Captain Breuer manipulated Ms. Hall's training evaluations to undermine her progress and portray her as unfit. Initially, a lieutenant trainer completed Ms. Hall's formal evaluation using the department's Recruit Firefighter Monthly or Interim Probation Report. He marked Ms. Hall as meeting all expectations, including specific praise for her "exceptional EMS skills."

After, Captain Breuer altered the evaluation. He changed five ratings for Ms. Hall from "acceptable" to "unacceptable" and lowered four additional scores. He modified the narrative from "meeting all expectations" to "not meeting expectations," and added language never mentioned in the original report, including claims that Ms. Hall lacked the "strength, stamina, and fitness required for duty." The altered evaluation also claimed (inaccurately) that Ms. Hall did not perform basic duties during training scenarios. In addition, Captain Breuer asserted that "training staff have provided Recruit Callegari-Hall with multiple opportunities to meet with additional fitness staff and peer trainers as well as diversifying the individual lessons, trainers teaching those lessons, and physical task demonstrations to capture a multitude of learning styles and physical capacities," even though Ms. Hall herself was a certified IAFF Peer Fitness Trainer. This language also falsely implied that the department provided Ms. Hall with extensive individualized support, when no such supplemental training occurred.

In explanation of his conduct, Captain Breuer told Ms. Hall that he changed the report to show that there was no place for her at Portland Fire and that she was not fit for duty.

On or around August 21, 2024, Captain Breuer removed Ms. Hall from the scheduled shift just prior to her final evaluation exam, which, if passed, would have allowed Ms. Hall to begin working regular shifts in the company as a PF&R firefighter paramedic. He escorted her into the office of Division Chief of Training, AJ Jackson. As a result, Ms. Hall was denied the opportunity to take and pass the final evaluation test.

During the meeting with Chief Jackson, Captain Breuer repeated his claims that Ms. Hall was not fit for duty and specifically had "strength issues." Chief Jackson then delivered Ms. Hall a written notice placing her on administrative leave as of that day. The directive also barred Ms. Hall from entering any Fire Bureau facility or City property while she was on leave, and required her to remain available from Monday through Friday, 8:00am-5:00pm, and required her to be able to report to work within a two-hour period.

On or around August 28, 2024, Chief Jackson called Ms. Hall in for a meeting. TAC Trainer Christine Pezzulo was also present. Chief Jackson told Ms. Hall that the training documentation documented concerns with Ms. Hall's basic skills, and as a result, Ms. Hall had the opportunity

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to resign or else go through PF&R's basic entry-level training academy. Ms. Hall disputed the claims regarding her abilities, and reported her concern that she had been treated unfairly and discriminated against based on gender. Ms. Pezzulo confirmed that the claimed deficiencies were untrue, and that she had never had any concerns with Ms. Hall's skills or abilities, including her strength.

Ms. Hall was clear that her complaint of gender discrimination and harassment stemmed from treatment by Captain Breuer and other training staff at Station 2. She detailed specific instances of threatening behavior and identified numerous witnesses with direct knowledge of her performance and hostile and discriminatory conduct she endured. To Ms. Hall's knowledge, PF&R's Professional Standards Office failed to interview several—if not all—key witnesses, and did not interview any other women who were subjected to the same or similar unequal treatment, even though they had been identified as witnesses.

PF&R's alleged investigation took nearly eight months to conclude. Ms. Hall remained on administrative leave throughout the entire duration.

On or around May 21, 2025, Ms. Hall received an email stating that PF&R's Professional Standards Office, in conjunction with the City's Bureau of Human Resources, had completed the investigation. Professional Standards Manager Nicolas Ball notified Ms. Hall that her claims were "not sustained," citing "insufficient evidence" for "discourteous and disparate treatment by training staff at Station 2."

On or around May 28, 2025, PF&R called Ms. Hall into a mandatory meeting and issued her a written notice extending her probationary period by one year. The letter claimed that because Ms. Hall was placed on paid administrative leave from August 21, 2024, to May 28, 2025, she could not complete the training process and therefore required further evaluation. It also informed her that she could restart training with the next training academy class on July 17, 2025, and that her probation would be extended through July 17, 2026. Ms. Hall's only practical option was to thus join the entry-level recruit class or resign.

On or around June 13, 2024 Ms. Hall began a medical leave.

To Ms. Hall's knowledge, PF&R and Captain Breuer have subjected other women to similar discrimination and unfair treatment. For example, PF&R has required other women recruits to repeat training programs, whereas male recruits who were actually falling short were not similarly required to re-do the training academy but instead allowed to join the company as firefighters. In some cases for male recruits who failed the final evaluation test, PF&R allowed them extensions, extra training, and additional opportunity to complete the test rather than, for example, failing them and requiring them to undergo or repeat entry-level basic training academy. Yet, PF&R and Captain Breuer did not do so for Ms. Hall when she was purportedly also in need of extra training or opportunities.

## **II. LEGAL CLAIMS**

Pursuant to ORS 30.275, Ms. Hall hereby places the City of Portland PF&R on notice of her intention to bring claims for damages, including but not limited to claims for employment discrimination and retaliation under ORS 659A.030, ORS 659A.199, ORS 659A.203. She may also have claims for torts such as defamation and intentional interference with economic

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relations. Her civil action may include claims for economic, non-economic and punitive damages, injunctive and declaratory relief. They may also seek to recover all costs and attorney fees associated with any civil action under applicable law.

The above-described time, place and circumstances are provided based on what is known to claimants and are set forth for purposes of providing notice pursuant to ORS 30.275; they 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.

### **III. RESOLUTION**

If the City is interested in a resolution of this matter before litigation, please contact me no later than **August 18, 2025**.

Sincerely,

**ALBIES & STARK**

A handwritten signature in cursive script, appearing to read "Maya Rinta".

Maya Rinta, Attorney at Law