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OFFER OF COMPROMISE PURSUANT TO OREGON RULE OF EVIDENCE 408

August 8, 2018

Mayor Ted Wheeler
1221 SW 4th Ave, Room 340
Portland, OR 97204

Dear Sir,

The National ICE Council will complete a release of all claims related to the Occupy ICE protest and the City of Portland's failure to protect the Council's membership in exchange for:

1. Attorney fees in the amount of \$15,000.00
2. Compensatory damages to National ICE Council members for damages and expenses associated with the Occupy Ice Protest, including but not exclusive to: lost wages; transportation costs; damage to property and/or all expenses reasonably related to the City of Portland's failure to protect the Council's members from June 20, 2018 to July 23, 2018.
3. Mayor Wheeler renounces the Imminent Threat Policy:
 - a. Publicly pledges to provide law enforcement assistance to the ICE facility and employees during protests/disturbances;
 - b. Publicly pledges to respond to calls for assistance from Council members in the same manner as other residents;
 - c. Will not instruct Portland law enforcement to avoid the area around the ICE facility during protests/disturbances.
4. Non-economic damages at a rate of \$15,000 a member.

We do not represent other affected persons who live, work or who were otherwise damaged by the Mayor's actions. We can only bind our membership. Any counter-offer would have to be presented to our membership.

Respectfully,

/s/ Sean J. Riddell
Sean J. Riddell

