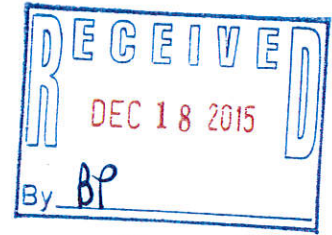


612 Moreland Ave., SE
Atlanta, GA 30316
404.627.2811 telephone
404.627.2311 facsimile

December 14, 2015



*c: D. Whalen
G. Poole
Litigation file*

SENT VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Kenny Smith
City Manager – City of Griffin
Office of City Manager
100 South Hill Street P.O. Box T
Griffin, GA 30224
Phone: 770-229-6408
Fax: 678-692-0403

RE: ANTE LITEM NOTIFICATION

Pursuant to O.C.G.A. § 36-33-5

To: City of Griffin Police Department
Our Client: Ms. Vaura Henley
Date of Incident: July 11, 2015
Location: 828 Ray Street, Griffin, Georgia 30223
Time of Incident: Approximately 2:30pm

Dear Mr. Smith:

Please be advised that this firm represents the interests of Ms. Vaura Henley for injuries she sustained as a result of a botched police raid on her home located at: 828 Ray Street, Griffin, Georgia 30223. This letter shall constitute Ante Litem notice pursuant to O.C.G.A. § 36-33-5 and is given on behalf of Vaura Henley.

FACTS

On July 11, 2015 at approximately 2:30pm, Ms. Henley was in her home preparing a meal in her kitchen when police officers entered through her front and back door with weapons drawn. The police officers did not knock. Ms. Henley believes that more than ten police officers entered her home, some with assault rifles, and instructed her not to move with they searched her home, kicking down doors and held her at

gunpoint. One officer, who Ms. Henley could not identify, told her that an informant had purchased drugs at her home. Ms. Henley informed the officer that they were at the wrong house. After searching the home and holding Ms. Henley at gunpoint for approximately 20 minutes, another officer admitted to Ms. Henley that they were at the wrong address. Ms. Henley was instructed to call Lieutenant Darrell Dix. Approximately 30 minutes after the police left her home, Captain Donald Britt came to formerly apologize to Ms. Henley for what occurred. Ms. Henley was never shown a search warrant.

LIABILITY

This incident occurred as a result of the negligence of officers, agents or employees of the City of Griffin in entering the home of a citizen without authorization or authority and unlawfully searching and detaining that citizen at gunpoint. These theories of negligence are not exclusive of additional theories that may exist but are not yet determined.

INJURIES

As a direct and proximate consequence of the negligence of officers, agents or employees of the City of Griffin Police Department, Vaura Henley suffered damage to her person. Specifically, following this incident, Ms. Henley began experiencing chest pains, and continues to have trouble sleeping and eating. Ms. Henley has sought psychiatric treatment for PTSD at McIntosh Trails in Griffin, Georgia and is currently under the care of her primary care physician. Her medical treatment is still continuing and the expense of said treatment will likely exceed \$5000.00. Ms. Henley will provide a comprehensive statement of her injuries and medical expenses at the conclusion of her treatment.

This letter is intended to establish ante litem notification and is presumed to comply with all such requirements under O.C.G.A. § 36-33-5 unless you notify us of any defect within ten (10) days of receipt. If further information is needed, please feel free to contact the undersigned.

Sincerely,



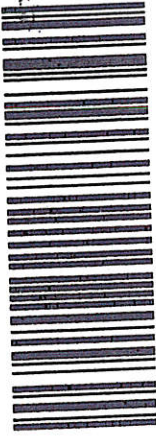
Jeffrey A. Reeves, Esq.

cc: City of Griffin Police Department

Law Offices of Laquetta S. Pearson, P.C.
612 Moreland Avenue, SE
Atlanta, Georgia 30316

**RETURN RECEIPT
REQUESTED**

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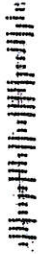
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Mr. Kenny Smith

City Manager - City of Griffin
Office of City Manager
100 South Hill Street
P.O. Box T
Griffin, GA 30224



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