Chief Yates

## MADDOX & HARDING, LLC

Attorneys at Law The Thacker Building

113 East Solomon Street Griffin, Georgia 30223 Telephone 770-229-4578 Facsimile 770-228-9111

February 5, 2016

VIA RETURN RECEIPT REQUESTED NO.: 7010 1670 0002 3104 6712

Griffin Police Department Office of the Chief 868 West Poplar Street Griffin, GA 30224



VIA RETURN RECEIPT REQUESTED NO.: 7010 1670 0002 3104 6729

City of Griffin 100 South Hill Street Griffin, GA 30223

Subject: Ante litem notice pursuant to Ga. Code Ann. § 36-11-1 with regard to events of 01/08/2016.

Dear Chairman, City Manager Smith, and Chief,

Please be advised that our firm has been retained by Ms. Carrie M. Watson to represent her with regard to an incident that occurred on 01/08/2016, while she was a customer in a CVS located at 736 S. Hill Street, City of Griffin, County of Spalding, Georgia. The purpose of this letter is to provide you with the required ante litem notice.

On or about 01/15/2016 at approximately 1530 hours, Ms. Watson was notified by several individuals that she was listed on the Griffin Police Department's website linked to Facebook alleging that she had committed fraud and forgery by picking up someone else's prescription. Ms. Watson called the phone number provided on the website and left a message after her call went unanswered. Ms. Watson then spoke with a representative for the Spalding County Sheriff's Office who contacted the Griffin Police Department and sent an officer out to Ms. Watson's residence. The officer arrived at Ms. Watson's residence and obtained her statement while repeatedly mentioning locking her up for the alleged crime. The officer then made a call to another law enforcement officer and was instructed to obtain Ms. Watson's contact information and they would be in touch on 01/19/2016.

In the interim, Ms. Watson was emotionally distraught. She was unable to leave her home to make a simple trip to the store in fear that she was going to jail for a crime that she did not do.

On or about 01/20/2016, at approximately 1300 hours Investigator Stacey Beckham made contact with Ms. Watson and requested that she meet with him and they scheduled to meet on Thursday. On or about 01/21/2016, at approximately 1045 hours, Investigator Stacey Beckham made contact with Ms. Watson and informed her that it was no longer necessary to meet because their investigation revealed that the time on the CVS camera and the register were not synced.

It is our contention that these facts show that the Griffin Police Department by and through its agents has committed the following tortious acts against our client Ms. Watson: 1). Slander Per Se, 2). Libel Per Se, 3). Intentional infliction of emotional distress, 4). Negligent infliction of emotional distress, 5). Punitive damages which are contrary to the laws and constitution of this State.

Finally, we ask that you conduct an internal investigation and also that you request the Georgia Bureau of Investigation to conduct an investigation into the violation of this citizen's rights. Thank you for your time and should you have any further questions, please feel free to give me a call.

Sincerely,

Todd A. Harding, J. D.

Chief yates

## MADDOX & HARDING, LLC

Attorneys at Law The Thacker Building

113 E. Solomon Street Griffin, GA 30223 Telephone 770-229-4578 Facsimile 770-228-9111

February 5, 2016

CERTIFIED RETURN RECEIPT REQUEST: 7015 1660 0000 4694 0210

City of Griffin 100 South Hill Street Griffin, GA 30223

Subject: Request by claimant Carrie M. Watson for all policy information.

Dear Sir/Madam,

I am writing this letter pursuant O.C.G.A. § 33-3-28 to request that you provide to my attorney the name of each known insurer which may be liable to me for an incident caused by your insured, which resulted in injuries to Ms. Watson.

Please be advised that our firm has been retained by Ms. Carrie M. Watson to represent her with regard to an incident that occurred on 01/08/2016, while she was a customer in a CVS located at 736 S. Hill Street, City of Griffin, County of Spalding, Georgia. The purpose of this letter is to provide you with the required ante litem notice.

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Thank you so much for your attention to this matter. If you have questions with regard to the contents of this letter, please feel free to give me a call.

Sincerely,

Todd A. Harding, J. D.

Attorney at Law

## STATE OF GEORGIA

## **COUNTY OF SPALDING**

Personally appeared before me an officer duly authorized to administer oaths,

CARRIE M. WATSON, who after being sworn, states that the nature of the claim asserted herein is a true and accurate representation of the nature of the claim. The substance of the narrative shows her true response.

This the  $\underline{\mathcal{L}^{4N}}$  day of February, 2016.

CARRIE M. WATSON, CLAIMANT

Sworn to and subscribed before me this the Upp day of February, 2016.

Mulla Perra Jambup
Notary Public
My commission expires 5/28/19

MELISSA PEREIRA ZAMBUJO NOTARY PUBLIC Pike County State of Georgia My Comm. Expires May 28, 2019