

DEPARTMENT OF LAW - CLAIM INVESTIGATION SUMMARY

Claim No. 13L0844

Date: August 4, 2014

Claimant /Victim Gary Parks, Jevonne Parks, Taudrea Tavada, and Daishia Parks
BY:(Atty)(Ins.Co Champion Law Group, LLC - Sean Campbell
Address: 10 Glenlake Pkwy, Suite 130, Atlanta, Georgia 30328
Subrogation: Claim for Property damage \$ Bodily Injury \$ 3,000,000.00
Date of Notice: 12/12/2013 Method: Written, Proper X Improper
Conforms to Notice: O.C.G.A. §36-33-5 X Ante Litem (6 Month) X
Date of Occurrence 07/25/2013 Place: 80 Jesse Hill Jr. Dr.
Department POLICE Bureau: Office:
Employee involved E. Johnson Disciplinary Action: None

NATURE OF CLAIM: Claimant alleges bodily injuries sustained while detained by Atlanta Police on the above referenced date. The investigation determined a municipal corporation shall not be liable for the torts of policemen or other officers engaged in the duties imposed on them by law, pursuant to O.C.G.A. §36-33-3.

INVESTIGATION:

Statements: City employee Claimant X Others Written Oral X
Pictures Diagrams Reports: Police X Dept Report Other X
Traffic citations issued: City Driver Claimant Driver
Citation disposition: City Driver Claimant Driver

BASIS OF RECOMMENDATION:

Function: Governmental X Ministerial
Improper Notice More than Six Months Other X Damages reasonable
City not involved Offer rejected Compromise settlement
Repair/replacement by Ins. Co. Repair/replacement by City Forces
Claimant Negligent City Negligent Joint Claim Abandoned

Respectfully submitted,


INVESTIGATOR - KJOLA CAMPBELL

RECOMMENDATION:

Pay \$ Adverse X Account charged: General Fund Water & Sewer Aviation
Claims Director/Manager: Malle Concur/date 8/6/14
Deputy City Attorney: JSBuron Concur/date 8/8/14
Committee Action: Council Action

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DEC 7 2013



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404.424.4407 888.414.8084

ENTERED - 12-31-13 - SB
13L0844 - A. KELLY

CHAMPION
LAW GROUP LLC

ANTE LITEM NOTICE

December 6, 2013

Cathy Hampton, City Attorney
City of Atlanta
Department of Law
68 Michelle Street, Suite 4100
Atlanta, Georgia 30303
(404) 330-6400
(404) 546-9379
lawdepartment@atlantaga.gov

RECEIVED

DEC 12 2013

CITY OF ATLANTA
DEPT OF LAW

*Assign to ACK
CAC 12/17/13*

Re: Garry Parks, Jevonne Parks, Taundrea Tavada, and Daishia Parks Notice of Claim for False Imprisonment; False Arrest; Wrongful Arrest/Incarceration; Abuse of Process; Malicious Prosecution; Assault and Battery; Kidnapping; Extortion; Intentional Infliction of Emotional Distress; Negligent Infliction of Emotional Distress; Medical Malpractice; Violation(s) of Civil Rights; and any other applicable tort claim(s) arising from the causes of action herein listed or that reasonably flow from these torts by The City of Atlanta Police and / or City of Atlanta Department of Corrections; The Attorney for The City of Atlanta's Office of the Solicitor General; The Municipal Court for the City of Atlanta; Norred Security contractors for the City of Atlanta; and Grady Health Systems.

Dear City Attorney Hampton:

I am writing on behalf of Garry S. Parks, Jevonne Parks, Taundrea Tavada, and Daishia Parks to inform the City of their claim(s) against the City of Atlanta Police; City of Atlanta Department of Corrections; The City Attorney and/or Office of the Solicitor General; The Municipal Court for the City of Atlanta; Norred Security; Grady Health Systems and individuals who work for these entities. I am also requesting the name and address of your insurance carrier and /or any other parties who are to receive ANTI LITEM NOTICE on behalf of the municipality, county, or state. If for any reason you find a deficiency with regard to this notice, persons or entities that were to receive notice, but did not, please forward that information upon



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receipt to our firm's address and we will verify and correct.

On or about, July 1, 2013, Mr. Parks was admitted to Grady Health Systems as a patient. He was an admitted patient at all times relevant to this litigation.

On or about, July 25, 2013, Mr. Parks a patient being treated on the Marcus Stroke and NueroScience Center Wing of Grady Health Systems Hospital (7th Floor), was arrested and charged with disorderly conduct and subsequently shackled to his hospital bed for approximately 30 days.

The Parties delayed access between Mr. Parks' and his Counsel. They also participated in keeping his children from accessing him to check on his welfare and treatment. Parties did try to extort Mr. Parks' children regarding his being in custody.

The Parties made inappropriate and malicious comments to Mr. Parks' children, and they were forced to witness his care, treatment, and lack thereof regarding his arrest, continued detention, and medical treatment in a manner designed to cause emotional distress. Parties through their actions or lack thereof forced Mr. Parks' children, to their financial and emotional detriment, to post bond to have him released. Mr. Parks' medical treatment was negatively impacted throughout this ordeal by the Parties' actions. Parties failed to timely provide and failed to provide a complete copy of Mr. Parks' medical records, arrest, or incident reports as requested on a signed medical released forwarded to the Medical Records Department on more than one occasion and to date.

- Please be advised that we will pursue any and all claims available to Mr. Garry S. Parks, Ms. Jevonne Parks, Ms. Taundra Tavada, and Ms. Daishia Parks, if the Parties listed fail to compensate them adequately for their injuries. We will seek damages in excess of (3) three million dollars. Please let us know if you have any questions. We look forward to hearing from you within 30-days.



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Sincerely,

Sean Campbell, Esq.
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cc: Garry Parks; Jevonne Parks; Taundrea Tavada; and Daishia Parks