

IN THE SUPERIOR COURT OF BRYAN COUNTY  
STATE OF GEORGIA

**SARAH BRADBURY,**  
Plaintiff

CIVIL ACTION NO.

v.

**Jury Trial Demanded**

**BRYAN COUNTY FIRE AND  
EMERGENCY SERVICES** and  
**FREDDY HOWELL and SHANNON  
BANCROFT**, in their individual  
and official capacities,  
Defendants

**COMPLAINT AND JURY DEMAND**

Plaintiff Summer Ms. Bradbury brings this action against her employer, Bryan County Fire and Emergency Services (the “County” or “BCFES”), and its Fire Chief, Defendant Freddy Howell (“Howell” or “Chief Howell”), under the Georgia Whistleblower Act (“GWA”), O.C.G.A. §45-1-4; 42 U.S.C. § 1983; 42 U.S.C. § 2000(d) et seq. (Title VI of the Civil Rights Act of 1964); 42 U.S.C. § 2000(e) et seq. (Title VII of the Civil Rights Act of 1964); and 42 U.S.C. § 12101 et seq. (the Americans with Disabilities Act of 1990) alleging as follows:

**JURISDICTION AND VENUE**

1. Plaintiff is a citizen of the state of Georgia and resident of Bryan County, Georgia.
2. Plaintiff is employed by Bryan County Fire and Emergency Services.
3. Plaintiff has been employed by Bryan County since February 20, 2018.

4. Plaintiff is a Lieutenant for Bryan County Fire and Emergency Services (“BCFES”).
5. BCFES is a fire and emergency services public safety department or agency for Defendant Bryan County.
6. Defendant Bryan County is a local or regional governmental entity that receives funds from the State of Georgia or a state agency (or from the State of Georgia and one or more state agencies).
7. Defendant Bryan County is a local or regional governmental entity that receives funds from the federal government or a federal agency (or one or more federal agencies).
8. Defendant Freddy Howell is the Bryan County Fire Chief and Director of Emergency Services.
9. Chief Howell has served in this position since 2012.
10. Chief Howell is a resident of Bryan County, Georgia, and is subject to the jurisdiction of this Court.
11. Division Chief Howell is a resident of Liberty County, Georgia.
12. Defendants Howell and Bancroft may be individually served with process during business hours at their respective office at the Bryan County Administration Building at 66 Captain Matthew Freeman Drive, Richmond Hill, Georgia.
1. BCFES is a county agency. Pursuant to the O.C.G.A. § 9-11-4, BCFES may be served by having process delivered to Carter Infinger in his capacity as the Chair of the Bryan County Commission at 51 N. Courthouse St. Pembroke, GA 31321.

2. Service can be made upon County Manager Ben Taylor at 66 Captain Matthew Freeman Drive, Richmond Hill, GA 31324.
13. This Court has exclusive subject matter jurisdiction over the claims asserted herein under O.C.G.A. § 45-1-4.
14. Venue is proper in this Court under O.C.G.A. § 45-1-4; the Georgia Constitution, art. VI, § 2, ¶¶ IV and VI, O.C.G.A. §9-10-31.
15. At all times relevant to this Complaint, the County was a “public employer” for purposes of O.C.G.A. § 45-1-4(a)(4).
16. At all times relevant to this lawsuit, Plaintiff was a “public employee” for purposes of O.C.G.A. § 45-1-4(a)(3).
17. Defendant Bryan County is a local or regional governmental entity that receives funds from the State of Georgia or a state agency (or from the State of Georgia and one or more state agencies).
18. As shown below, Defendant Howell and Defendant Bancroft’s wrongful acts alleged herein were all willful, malicious, and corrupt and in violation of well-established law. Thus, Defendants Howell or Bancroft are not entitled to any immunity by virtue of their employment, role, or job title.
19. All actions by Defendants have been retaliatory and discriminatory in nature and followed actions by Plaintiff that were protected under Georgia Whistleblower Act (“GWA”).
20. GWA does not contain ante litem requirements.
21. Further, ante litem notices and statutory waivers of sovereign immunity are not required under Georgia law for intentional acts.
22. However, O.C.G.A. § 36-11-1’s county ante litem requirements state “*all* claims

against counties must be presented . . .”

23. Since the requirements appear to conflict, Plaintiff served ante litem notice upon Bryan County to satisfy O.C.G.A. § 36-11-1 (Ex. A).
24. This service is also intended to preserve any current or future claims of negligence against Defendants.
25. Ante litem notices were sent via certified mail to Defendants Howell and Bancroft, along with Chairman Infinger and County Manager Taylor at the addresses listed above on July 3, 2023 (Ex. B).
26. Additionally, copies of all ante litem notices were delivered via email upon the County Attorney, Aaron Kappler.
27. Jurisdiction and venue are proper in this court.

### **PARTIES**

28. Plaintiff began working for BCFES on or about February 20, 2018 as a Firefighter/ EMT-B.
29. Plaintiff was promoted to Lieutenant on January 3, 2021.
30. Ms. Bradbury has an Associate’s degree in Fire Science.
31. Plaintiff job duties include:
  - Organizes and oversees daily activities of shift personnel.
  - Helps to provide supervision and to maintain order at fire scenes.
  - Provides safety and fire suppression training to new employees and continuing education to existing employees.
  - Provides fire safety education to schools and civic groups.
  - Performs department personnel duties, including leave approval, timecard review, and checkout sheet review.
  - Maintains daily logbook of station activity and prepares incident reports.
32. Ms. Bradbury has additional qualifications and certifications to include:
  - EMT- Basic License, State of Ga. and National Registry of Emergency Medical Technicians
  - EMS Instructor License, State of Georgia
  - NPQ and IFSAC:

- Firefighter I and II
  - Airport Firefighter
  - Hazardous Materials Awareness, Operations, and Technician Levels
  - Driver/ Operator Pumper
  - Fire Instructor I
  - NPQ:
    - Rope Technical Rescuer I
    - Fire Officer I
  - ERDI: ERD I Diver Technician and ERD Full Face Mask Diver Technician Level
  - GPSTC:
    - Health and Safety Officer
    - Ga. Crisis Intervention (CIT) Program
  - DPH: Critical Incident Stress Management: Peer Training
  - ICISF: Assisting Individuals in Crisis and Group Crisis Intervention
  - NIMS: IS 100, IS 200, IS 300, IS 400, IS 700, IS 800
33. When acting as the Battalion Chief in May 2023 (and other dates going back to early 2022), Ms. Bradbury's duties included:
- Supervises the activities of Department personnel; responds as officer-in-charge at the scene of a fire until relieved by the Deputy Operations Chief or Director of Emergency Services.
  - Participate as a member of the management team, in the development, recommendation and coordination of department programs. Supervises the implementation of pre-fire planning, division inspections, building and in-service inspections, home inspections, and other programs; ensures uniformity of operations and adherence to departmental procedures.
  - Coordinates and implements the training activities of personnel assigned to division.
  - Assists in the development of the department's annual budget.
  - Observes and follows all county fire codes, ordinances and fire laws and regulations of the state in order to protect life and property; complies with all rules, orders, and instructions issued by superior officer.
  - Aids and assists with emergencies or incidents involving disaster, coordinates with emergency manager to perform a variety of tasks.
  - Maintain current field and code manuals, policy and procedures, employee handbooks, various maps, addresses, and related material for reference and/or review.
  - Completes and prepares a variety of forms, logs, requests, records, reports, correspondence, and various other documents associated with daily responsibilities of this position; maintains administrative records and files as required.
34. Ms. Bradbury has always received favorable reviews and performance evaluations.

35. Ms. Bradbury has served as the point of contact and agency liaison for multiple local businesses.
36. Ms. Bradbury interacts with all divisions and county offices representatives.
37. Defendant Howell is the Chief Executive Officer of the fire department.
38. Defendant Bancroft is one of two Division Chiefs immediately under Defendant Howell.
39. Defendant Howell grants all authorities and permissions to Defendant Bancroft.
40. All actions by Defendant Bancroft are under the color of Defendant Howell.

**BACKGROUND, PROTECTED ACTIVITY, RETALIATIONS,  
DISCRIMINATION, &  
ADVERSE EMPLOYMENT ACTIONS**

41. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.
42. No public employer shall retaliate against a public employee for disclosing a violation of or noncompliance with a law, rule, or regulation to either a supervisor or a government agency, unless the disclosure was made with knowledge that the disclosure was false or with reckless disregard for its truth or falsity. O.C.G.A. § 45-1-4.

*Ms. Bradbury notifies Defendants Howell and Bancroft that she received reports that a fellow lieutenant committed acts of sexual assault and harassment, being missing while on duty, and smelled strongly of alcohol while on duty.*

43. On or about March 6, 2023, at the direction of her superior, Ms. Bradbury notified Defendants Howell and Bancroft that she received reports that a fellow Lieutenant, Lt. "T", had committed acts of sexual assault and harassment of recruits, being missing from duties for long periods of time,

and smelled strongly of alcohol while on duty.

44. Sexual assault and harassment are violations of local, state, and federal laws.
45. Intoxication while on duty is a violation of Bryan County's Personnel Manual.
46. Ms. Bradbury's reporting of "T's" actions was protected activity for the purposes of GWA.
47. Further, Ms. Bradbury had a duty to report this behavior under Bryan County Personnel Policy.

Defendant Bancroft once worked with Lt. "T" and wanted to keep the allegations from being reported. Bancroft was angry that Bradbury reported.

48. Upon receiving the report, Defendant Bancroft verbally assaulted and berated Ms. Bradbury yelling multiple times "why did you bcc the Chief?"
49. Defendant Bancroft and Lt. "T" worked together prior to coming to BCFES.
50. Ms. Bradbury stated that she had a duty to report under Bryan County Policy.

Defendant Bancroft's verbal assault on Ms. Bradbury causes her extreme distress, and Bancroft implements a new policy immediately after she calls out from work.

51. Ms. Bradbury left that meeting physically shaking and nauseous.
52. On March 7-8, 2023 (the two days immediately following the verbal assault by Defendant Bancroft), Ms. Bradbury took sick leave because she was depressed, having suicidal thoughts, and wanting to commit self-harm.
53. On March 9, 2023, Ms. Bradbury called out of work at 0620 due to severe mental and emotional distress from the March 6, 2023 meeting.
54. Later that same morning, Defendant Bancroft sent an agency-wide email with a new update to the call-out procedures: that callouts "should be made no less than two hours prior to the shift reporting time of 0700."
55. Multiple callouts from other firefighters occurring between February 15, 2023

– Feb. 28, 2023 occurred within two hours of 0700 shift reporting, but none of those callouts triggered a policy update.

56. Defendant Bancroft’s email and policy change were retaliation against Ms. Bradbury.

*Bradbury takes FMLA leave due to the extreme distress, suicidal thoughts, and desires to commit self-harm; Defendant Bancroft interferes with her leave.*

57. On or about March 10, 2023, Ms. Bradbury contacted Human Resources (“HR”) to complete the paperwork for – and begin – FMLA leave.

58. On or about March 15, 2023, while on her two weeks of approved FMLA leave, Ms. Bradbury received a phone call from BC Stillwell stating that the FMLA paperwork had not yet been received.

59. Ms. Bradbury contacted HR, who said that there were no issues with her FMLA paperwork.

60. When Ms. Bradbury reported back to Stillwell, he responded “I wonder what Bancroft was talking about.”

*Defendant Bancroft denies Ms. Bradbury a previously promised position.*

61. On or about March 30, 2023, upon returning from FMLA, Ms. Bradbury texted Defendant Bancroft ““Hey, am I still going to be Coordinator for the upcoming Recruit Class?”

62. On or about April 27, 2023, at her interview for the Battalion Chief vacancy, Ms. Bradbury asked Defendant Bancroft about being a Recruit Coordinator, since she was a tenured and permanent Recruit Coordinator and had a long history of training, working with, grading, and participating in the Recruit Program.



63. Discussions about being a Recruit Coordinator had occurred multiple times between Ms. Bradbury and Defendant Bancroft in the preceding months.
64. In March 2023, Defendant Bancroft told Ms. Bradbury that she would be selected as the coordinator for the June recruit class.
65. Defendant Bancroft had previously told others in the agency that Ms. Bradbury had been selected as a Recruit Coordinator.
66. Ms. Bradbury was not, in fact, selected as Recruit Coordinator, nor was she told this directly.

*Defendant Bancroft denies wages or comp time to Bradbury.*

67. On or about May 5, 2023, Defendant Bancroft singled out Ms. Bradbury by no longer allowing her to adjust her timecard after performing off-duty scheduling duties.
68. Lieutenants often perform these duties in accordance with the BCFES Standard Operating Guidelines.
69. Additionally, Lieutenants can perform these duties when ordered to do so by a Battalion Chief.
70. Since at least 2018 when Ms. Bradbury joined BCFES, Battalion Chiefs have been authorized to put exceptions on a Lieutenant's timecard to ensure they were paid for the additional time spent performing these duties.
71. The exceptions allowed for a Lieutenant's timecard to be adjusted to reflect off-duty time worked.
72. By no longer allowing Ms. Bradbury to adjust her timecard for hours that she actually worked, and not compensating her accordingly, Defendant Bancroft was retaliating against Ms. Bradbury.

73. Defendant Bancroft's actions were also violations of the Fair Labor Standards Act.

*Defendants Howell and Bancroft manipulate the promotion testing scores to ensure Bradbury is at the bottom of the list.*

74. On or about May 8, 2023, Defendants Howell and Bancroft met to review promotion testing scores for determining who would be promoted into a Battalion Chief vacancy.

75. Defendants Howell and Bancroft manipulated the scoring to achieve results that were satisfactory to Defendant Howell.

76. The manipulation of those numbers caused Ms. Bradbury to be placed at the bottom of the promotion list.

77. Ms. Bradbury was qualified for this promotion and had actually been serving in the Interim Battalion Chief position.

78. It was presumed Ms. Bradbury would be selected for this position.

79. The manipulation of the scores was retaliation discrimination based on gender, sexual orientation, and disabilities.

80. Bradbury was the only openly gay female Lieutenant in BCFES.

81. Bradbury was the only openly gay female who was applying for the Battalion Chief promotion in BCFES.

82. Bradbury was also open about her mental health journey.

83. Regarding another employee who had mental health diagnoses, Defendant Howell previously stated on multiple occasions that "*I would never promote [them] because of their mental health issues.*"

84. Defendant Howell made negative statements about that employee having to

take mental health medications “*to be normal.*”

Defendants promote Lt. “T”– and continue retaliating against Ms. Bradbury.

85. On or about May 17, 2023, Defendants Howell and Bancroft informed Ms. Bradbury that Lt. “T” was being promoted to Battalion Chief. and that Ms. Bradbury would be moved to a different shift and station effective that following Monday (May 22, 2023).
86. Ms. Bradbury had spent five years on her previous shift before being moved in May 2023, with the exception of a six-month assignment at her request a few years prior.
87. Moving Ms. Bradbury to a different shift was retaliation against her.
88. On May 18, 2023, after learning that she had not been selected for Battalion Chief and that she would be moving to a new shift after five years, Ms. Bradbury texted Defendant Bancroft ““I’d like to be considered for a Recruit Coordinator position. Thanks.”
89. Defendant Bancroft never replied, although he historically always replied to her messages.
90. The following week, as mentioned above, Ms. Bradbury learned about a Recruit Coordinator meeting from a coworker. Ms. Bradbury had not been invited nor notified that she was not selected for the position despite being tenured and permanent in that role.
91. On May 19, 2023 and May 25, 2023, Ms. Bradbury texted Defendant Bancroft about being able to evaluate a testing event in order to maintain her status as a State Evaluator.
92. Defendant Bancroft never replied, thus denying Ms. Bradbury the opportunity

to maintain her credentials. Ms. Bradbury was forced to seek evaluator opportunities at other agencies and incur additional expenses and time.

Defendant Bancroft tells a fellow Lieutenant to “stay away from Bradbury,” then confirms they threw out testing scores.

93. On or about June 8, 2023, Defendant Bancroft tells Bradbury’s fellow Lieutenant, “stay away from Bradbury.”
94. Defendant Bancroft confirms to that Lt. that testing scores for promotional testing were indeed thrown out.

### **CLAIMS**

#### **COUNT ONE: UNLAWFUL RETALIATION AND VIOLATIONS OF THE GEORGIA WHISTLEBLOWER ACT**

95. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.
96. Ms. Bradbury disclosed violations or noncompliance with laws, rules, or regulations to her supervisors.
97. Ms. Bradbury objected to activities, policies, and practices that she had reasonable cause to believe were in violation of or noncompliance with a law, rule, or regulation to her supervisors and a government agency.
98. Ms. Bradbury disclosed life and safety issues to Defendants.
99. Ms. Bradbury genuinely feared for the lives, safety, health, and welfare of Bryan County citizens and BCFES first responders and recruits being at risk of harm or death.
100. Plaintiff’s reporting of, and objecting to, these violations led to harassment, discrimination, and retaliation by Defendants Howell and Bancroft.

101. Defendants have retaliated against Ms. Bradbury for her whistleblowing reporting, in violation of O.C.G.A. § 45-1-4(d).
102. Plaintiff's objections, disclosures, and reporting were protected because she objected to and disclosed activities that violated local, state, or county laws, rules, procedures, and regulations.
103. Further, Plaintiff's objections, disclosures, and reporting were protected because they related to matters of public concern regarding lives, safety, health, and welfare of Bryan County citizens as well as first responders employed by BCFES.
104. While Plaintiff was a public employee of BCFES, she objected to, disclosed, and reported to her supervisors and Defendant Bryan County that certain actions violated the rules, regulations, procedures, laws, or ordinances of BCFES.
105. Ms. Bradbury reported discriminatory, retaliatory, and harassing behavior to her supervisor, human resources, and/or County officials.
106. As such, Ms. Bradbury's supervisor, human resources, and/or County officials have received notice of discriminatory, retaliatory, and harassing behavior.
107. Ms. Bradbury's supervisor, human resources, and County officials and administrators have failed to act on the reports of harassment, discrimination, and retaliation.
108. Ms. Bradbury's supervisor, human resources, and County officials and administrators have failed to take actions to ensure the life/safety of Bryan County citizens and first responders.
109. In fact, Defendants promoted a firefighter from Lieutenant to the position of

Battalion Chief within weeks of Ms. Bradbury notifying them that she'd received reports that this person had committed acts of sexual assault, sexual harassment, being missing from duty, and smelling strongly of alcohol while on duty.

110. Defendants' actions, failures, and omissions violate the Bryan County Personnel Manual as well as local, state, and federal laws.

**COUNT TWO: DISCRIMINATION IN VIOLATION OF TITLE VI, TITLE VII, AND AMERICANS WITH DISABILITIES ACT**

111. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.

112. Defendants Howell and Bancroft manipulated the scores to ensure the highest score – and thus the promotion – went to Tomko.

113. Defendant Bancroft, who assisted in the scoring of the performance testing, retaliated against Plaintiff due to her reporting of Tomko.

114. Defendants discriminated against Ms. Bradbury based on sexual orientation.

115. Defendants discriminated against Ms. Bradbury based on her mental health diagnoses and previous FMLA leave.

116. As a result of Defendants' retaliation against her, Ms. Bradbury has suffered lost benefits, harm to her career, and other general and special damages in an amount to be proven at trial.

117. Many of the wrongful acts of Defendants Howell and Bancroft have been in furtherance of a general policy and practice of BCFES to facilitate and conceal wrongdoing by hindering investigation and correction of such wrongdoing by County officials and to intimidate, harass, obstruct, and retaliate against

anyone who dares shed light on the corruption.

118. Defendants are liable for all economic and non-economic damages resulting from its acts of retaliation against Plaintiff as proven at the trial of this action.

119. Ms. Bradbury has suffered economic harm and other damages caused directly and proximately by the County's retaliation against her.

**COUNT TWO: VIOLATION OF 42 U.S.C. § 1983 BY BRYAN COUNTY AND CHIEF HOWELL, BOTH IN HIS PERSONAL AND OFFICIAL CAPACITIES**

120. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.

121. Ms. Bradbury's disclosures, objections, and reporting were matters of public interest and concern.

122. Ms. Bradbury reported violations to bring attention to life/safety risks for the citizens of Bryan County, which are major issues of public concern.

123. By retaliating against Ms. Bradbury for reporting or disclosing a violation of, or noncompliance with, a law, rule, or regulation to either a supervisor or a government agency, Defendants Howell and Bancroft, under color of law, caused Ms. Bradbury to be deprived of her rights under the Constitution and laws, including without limitation, her right to free speech under the First Amendment of the United States Constitution, in violation of 42 U.S.C. § 1983.

124. In retaliating against Ms. Bradbury for exercising her First Amendment rights, Defendants Howell and Bancroft were acting under color of law.

125. In retaliating against Ms. Bradbury for exercising her First Amendment rights, Defendants Howell and Bancroft were exercising their discretionary

power.

126. In retaliating against Ms. Bradbury for exercising her First Amendment rights, Defendants Howell and Bancroft violated a right that was clearly established at the time.
127. In retaliating against Ms. Bradbury for exercising her First Amendment rights, Defendants Howell and Bancroft were acting in furtherance of a general County custom and policy.
128. In retaliating against Ms. Bradbury for exercising her First Amendment rights, Defendants Howell and Bancroft were acting as the final policy-making authority for the County with respect to promotion of firefighters within the Fire Department.
129. Ms. Bradbury's speech was a matter of public concern.
130. The lives, health, safety, and welfare of Bryan County citizens and first responders outweighs any County interest in prohibiting speech to promote the efficiency of public services.
131. Ms. Bradbury's disclosures and reporting played a substantial part in Defendants Howell and Bancroft retaliations and decisions to not promote her and refusal to respond to her requests for movement into a Recruit Coordinator position for which she had already been offered.
132. Ms. Bradbury has suffered economic harm and other damages caused directly and proximately by the County's retaliation against her.

**COUNT THREE: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

133. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.



134. Plaintiff has suffered extreme stress, depression, self-harm desires, and suicidal thoughts since Defendants began retaliating against her.
135. Plaintiff has taken FMLA leave and personal time off to avoid the retaliation, discrimination, toxic work environment, and emotional distress caused by the intentional acts of Defendants.
136. Defendants' intentional, willful, and malicious actions are extreme and outrageous.
137. Defendants' actions are the cause of Plaintiff's emotional distress.

**COUNT FOUR: FAILURE TO PROVIDE A WORKPLACE FREE OF HARASSMENT, DISCRIMINATION, AND RETALIATION**

138. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.
139. Defendant Bryan County had actual knowledge of the hostile work environment, discrimination, harassment, and retaliation.
140. Further, Defendant Bryan County certainly had actual knowledge of the hostile work environment, discrimination, harassment, and retaliation *after* Plaintiff made protected whistleblower reports through Plaintiff's counsel.
141. Defendants Howell and Bancroft had actual knowledge of the hostile work environment, discrimination, harassment, and retaliation.
142. Defendants' administrators, employees, and agents with actual knowledge of Ms. Bradbury's reports had the authority and ability to investigate and take meaningful corrective action to remediate the harassment, discrimination, and hostile environment suffered by her, but failed to do so.
143. Defendants willfully, wantonly, and consciously disregarded Plaintiff's

reports.

144. Defendants' actions, or inactions, created a climate in which harassment, discrimination, and hostile environment were tolerated.

145. Defendants' failures to take meaningful disciplinary action, and Defendant's multiple failures to take any meaningful corrective action to remediate the harassment, discrimination, and hostile environment that Plaintiff experienced before, after, and because of, her reporting of matters of public concern denied Plaintiff of her clearly established state, federal rights and Constitutional rights.

**COUNT FIVE: FAILURE TO PROVIDE A WORKPLACE FREE FROM HARASSMENT, ASSAULT, AND TITLE VII VIOLATIONS**

146. Plaintiff re-allege and incorporate the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.

147. Ms. Bradbury suffered sex discrimination prohibited by Title VII.

148. Defendant had actual knowledge of the Plaintiff's sexual harassment and discrimination claims.

149. Defendants had actual knowledge of the hostile environment Ms. Bradbury continued to suffer after reporting sexual harassment and discrimination by Tomko.

150. Defendant's administrators, employees, and agents with actual knowledge of Ms. Bradbury's reports had the authority and ability to investigate and take meaningful corrective action to remediate sexual harassment and the hostile environment but failed to do so.

151. Defendant's actions, or inactions, created a climate in which sexual

harassment, torment, and bullying BCFES employees was tolerated.

152. Defendant's failure to take meaningful disciplinary action, and Defendant's multiple failures to take any meaningful corrective action to remediate the sexual harassment and hostile environment that Plaintiff and other BCFES employees experienced after denied Ms. Bradbury and others of their clearly established federal rights and Constitutional rights.

**COUNT SIX: LACK OF POLICIES AND PROCEDURES FOR HARASSMENT, DISCRIMINATION, OR RETALIATION**

153. Plaintiff re-allege and incorporate the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.

154. Plaintiff was not allowed to address, rebut, or appeal the unilateral decisions of removal of her job duties neither before nor after being informed of them.

155. Upon information and belief, at all times relevant hereto, Defendants' Policy and Procedure documents do not provide any policy, procedure, or guidance for employees who seek redress from policies and procedures for harassment, discrimination, and retaliation from their supervisors.

156. Defendants failed to follow its outlined timelines or conduct investigations in a timely manner when investigating the sexual harassment claims.

157. Defendant does not have adequate policies and procedures for harassment, discrimination, and retaliation or training.

158. Defendant's failure to establish policies and procedures for harassment, discrimination, and retaliation effectively denied Ms. Bradbury's clearly established federal rights and Constitutional rights.

159. As a direct and proximate result of Defendant's actions, and inactions, Ms.

Bradbury suffered, and continues to suffer, injuries including, but not limited to emotional distress, psychological trauma, and mortification.

**COUNT SEVEN: FAILURE TO TRAIN**

160. Defendants should provide training to employees, administrators, and staff on how Title VII protects against sexual harassment and discrimination, their rights and obligations under Title VII, and how to file a grievance.
161. Upon information and belief, at all times relevant hereto, Defendants did not train employees on Title VII rights and obligations.
162. Defendant's failure to train its employees, administrators, and staff effectively denied Ms. Bradbury and other BCFES employees of their clearly established federal rights and Constitutional rights.
163. As a direct and proximate result of Defendants' actions, and inactions, Ms. Bradbury has suffered, and continues to suffer, injuries including, but not limited to emotional distress, psychological trauma, and mortification.

**COUNT EIGHT: CIVIL CONSPIRACY**

164. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.
165. On or about May 8, 2023, Defendants Howell and Bancroft, and Division Chief Patterson, reviewed promotion testing results for Battalion Chief and Lieutenant candidates.
166. Instead of using the testing scores from each candidate to determine promotions, Howell and Bancroft made an agreement to "doctor" the ranking to achieve the results desired by Defendant Howell.
167. These desired results ensured that "T" would be promoted, despite recent

- reports of sexual assault and harassment, as well as circumstantial evidence of him being intoxicated on the job.
168. Further, Howell and Bancroft ensured that Ms. Bradbury was at the bottom of the list.
169. Placing Ms. Bradbury at the bottom of the list was retaliation for her previous reporting of “T’s” alleged intoxication and reports of sexual assault and harassment.
170. Placing Ms. Bradbury at the bottom of the list was discrimination against her due to her status as a female.
171. Placing Ms. Bradbury at the bottom of the list was discrimination against her due to her being open about her sexual identity (gay) and mental health diagnoses.

#### **COUNT NINE: FMLA RETALIATION**

172. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.
173. Defendant Bryan County is a public government agency and thus is a covered employer under FMLA.
174. Ms. Bradbury’s medical leave under FMLA was a statutorily protected activity or expression.
175. Ms. Bradbury suffered multiple adverse employment actions following her return from FMLA leave.
176. A causal relationship exists between the protected activity and the adverse employment actions of being denied promotion to Battalion Chief or being

allowed to continue as a Recruit Coordinator.

177. Ms. Bradbury's protected activity and adverse employment activity are not unrelated.

178. Close temporal proximity exists between the protected activity and adverse employment activity.

179. Multiple instances of retaliation and discrimination occurred during the same period of time.

**COUNT TEN: FMLA INTERFERENCE**

180. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.

181. Defendant Bryan County is a public government agency and thus is a covered employer under FMLA.

182. Ms. Bradbury was denied the benefit of uninterrupted FMLA leave.

183. Ms. Bradbury was denied an FMLA that was free from retaliation and discrimination by the very persons who retaliated and discriminated against her.

184. Defendants knew Ms. Bradbury's leave was for mental health reasons, yet Defendant Bancroft interrupted her leave for a non-existent administrative reason.

185. Ms. Bradbury was entitled to FMLA leave free from harassment, retaliation, and discrimination.

186. Ms. Bradbury was denied a promotion due to Defendant Bancroft's retaliation against her for her reporting "T" and Defendant Howell discriminating against her for her mental health diagnoses and being openly gay.

187. Denying a promotion is a violation of FMLA.

**WHEREFORE, Plaintiff respectfully ask this Court to:**

1. Find, order, and declare that Defendant violated Plaintiff's rights under the Georgia Whistleblower Act (O.C.G.A. § 45-1-4);
2. Award Plaintiff all legal and equitable relief available under the law based on the facts proven after discovery, including but not limited to:
  - a. compensatory damages under O.C.G.A. § 45-1-4(e)(2)(E);
  - b. injunctive relief as may be necessary to protect Plaintiff's rights under O.C.G.A. § 45-1-4;
  - c. injunctive relief restraining continued violations of O.C.G.A. § 45-1-4(e)(2)(A);
  - d. reinstatement of job responsibilities and duties under O.C.G.A. § 45-1-4(e)(2)(B) and O.C.G.A. § 45-1-4(e)(2)(C);
  - e. back- and front pay under O.C.G.A. § 45-1-4(e)(2)(D);
  - f. attorneys' fees and expenses of litigation under O.C.G.A. § 45-1-4(f);
  - g. punitive damages, as applicable, for Counts 2-7 or as otherwise deemed justified by the court;
  - h. any other relief justified by the evidence and the governing law; and
  - i. pre- and post-judgment interest at the maximum rates allowable by law;
3. Grant a trial by jury on all issues so triable; and
4. Grant any further relief deemed necessary, proper, or just.

Respectfully submitted this 7th day of July 2023.

*/s/ Brandy Scott Mai*  
Attorney for Plaintiff  
Ga. Bar No. 746703  
(910) 580-0380  
brandy@joesteffen.com

223 W. York St.  
Savannah, GA 31401  
(877) 767-2453





# EXHIBIT A

# STEFFEN LAW FIRM

223 W. York Street | Savannah, Georgia 31401

PH: (877) 767-2453 | FAX: (912) 298-5566 |

JOE STEFFEN | LICENSED IN GA & VA | (912) 604-4147 | JOE@JOESTEPPEN.COM

BRANDY MAI | CERTIFIED EMERGENCY MGR | POST INSTRUCTOR (GA) | (910) 580-0380 | BRANDY@JOESTEPPEN.COM

July 5, 2023

**via certified mail/ return receipt requested**

Carter Infinger  
Chairman, Bryan County Commission  
51 North Courthouse St.  
Pembroke, GA 31321

Ben Taylor  
County Administrator, Bryan County  
66 Captain Matthew Freeman Dr.  
Richmond Hill, GA 31324

Chief Freddy Howell  
66 Captain Matthew Freeman Dr.  
Richmond Hill, GA 31324

Division Chief Shannon Bancroft  
66 Captain Matthew Freeman Dr.  
Richmond Hill, GA 31324

**NOTICE OF CLAIM & REPRESENTATION/ANTE LITEM NOTICE**

To Whom It Will Concern,

Our office has been retained to represent **Sarah “Sam” Bradbury**, a lieutenant for Bryan County Emergency Services in an action against BCFES, Chief Freddy Howell, and Division Chief Shannon Bancroft (in their individual and official capacities).

O.C.G.A. § 45-1-4 makes it unlawful to retaliate against a public employee for disclosing a violation of or the noncompliance with a law, rule, or regulation of a government agency. Under state and federal law, Ms. Bradbury has an absolute right to work in an environment where she is not retaliated against because she engaged in protected conduct. Further, she has a state and federal right to complain of retaliation without the fear of reprisal. The actions of BCFES, Chief Freddy Howell, and Division Chief Bancroft violated Ms. Bradbury's rights under O.C.G.A. § 45-1-4, policies and procedures of Bryan County, Georgia, the Code of Ordinances of Bryan County, the Constitution of the State of Georgia, and the U.S. Constitution.

Georgia Whistleblower Act does not have an ante litem requirement. Further, counties do not enjoy sovereign immunity from claims for intentional acts. However, the purpose of this letter is to comply with any and all ante litem notice requirements that may still exist under O.C.G.A. § 36-11-1.

BCFES, Chief Freddy Howell, and Division Chief Shannon Bancroft have retaliated against my client on a frequent and ongoing basis since she engaged in protected whistleblower activities that included reporting a fellow firefighter for reports of sexual assault, sexual harassment, going "missing" while on duty, and smelling strongly of alcohol while on duty. Ms. Bradbury has engaged in protected activity by making complaints regarding BCFES and first responders' violations of law, policy, and/or regulations occurring within the course and scope of her employment and the filing of the forthcoming lawsuit to redress the violations of the law and her rights under the law.

The additional state tort and constitutional law claims that Ms Bradbury may have against the County – which are also preserved through this ante litem – include, but are not limited to: retaliation for engaging in protected activity as a whistleblower; breach of contract; conspiracy; violation of rights to freedom of

expression, speech, and association in violation of the First Amendment to the U.S. Constitution and the Constitution of the State of Georgia; violation of liberty interest; failure to provide a workplace free of harassment, discrimination, and retaliation; failure to provide a workplace free from sexual harassment and assault; defamation; libel; tortious interference with employment relationships; tortious interference with contractual relationships; intentional infliction of emotional distress; negligent infliction of emotional distress; foreclosure of opportunity for future employment; and other state and federal legal claims as applicable.

Please take appropriate measures to avoid spoliation of any items or records that may reasonably be related to litigation in this matter.

Pursuant to O.C.G.A. § 36-11-1, this claim is presented within the period required by statute. This claim is for general and special damages, both past and future, and any other damages allowed under Georgia law. If you contend this letter does not provide you with sufficient notice pursuant to O.C.G.A. § 36-11-1, or fails to comply with said statute, please advise me immediately in writing, and we will correct any deficiencies.

Sincerely,

/s/ Brandy Mai  
Attorney for Sam Bradbury  
223 W. York St.  
Savannah, GA 31401  
Ga. Bar No. 746703  
(910) 580-0380  
brandy@joesteffen.com

cc: County Attorney Aaron Kappler  
(AKappler@tokn.com)





TELFAIR SQUARE  
 118 BARNARD ST  
 SAVANNAH, GA 31401-9991  
 (800)275-8777

07/03/2023 12:35 PM

Product	Qty	Unit Price	Price
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First-Class Mail® Letter	1		\$0.63
Pembroke, GA 31321			
Weight: 0 lb 0.80 oz			
Estimated Delivery Date			
Thu 07/06/2023			
Certified Mail®			\$4.15
Tracking #:			
9589 0710 5270 0161 1543 35			
Return Receipt			\$3.35
Tracking #:			
9590 9402 8350 3094 2020 35			
Total			\$8.13

First-Class Mail® Letter	1		\$0.63
Richmond Hill, GA 31324			
Weight: 0 lb 0.80 oz			
Estimated Delivery Date			
Thu 07/06/2023			
Certified Mail®			\$4.15
Tracking #:			
9589 0710 5270 0161 1543 42			
Return Receipt			\$3.35
Tracking #:			
9590 9402 8350 3094 2020 42			
Total			\$8.13

First-Class Mail® Letter	1		\$0.63
Pembroke, GA 31321			
Weight: 0 lb 0.80 oz			
Estimated Delivery Date			
Thu 07/06/2023			
Certified Mail®			\$4.15
Tracking #:			
9589 0710 5270 0161 1543 66			
Return Receipt			\$3.35
Tracking #:			
9590 9402 8350 3094 2020 11			
Total			\$8.13

First-Class Mail® Letter	1		\$0.63
Richmond Hill, GA 31324			
Weight: 0 lb 0.80 oz			
Estimated Delivery Date			
Thu 07/06/2023			

Total

First-Class Mail® 1 \$0.63  
Letter  
Pembroke, GA 31321  
Weight: 0 lb 0.80 oz  
Estimated Delivery Date  
Thu 07/06/2023  
Certified Mail® \$4.15  
Tracking #:  
9589 0710 5270 0161 1543 66  
Return Receipt \$3.35  
Tracking #:  
9590 9402 8350 3094 2020 11  
Total \$8.13

First-Class Mail® 1 \$0.63  
Letter  
Richmond Hill, GA 31324  
Weight: 0 lb 0.80 oz  
Estimated Delivery Date  
Thu 07/06/2023  
Certified Mail® \$4.15  
Tracking #:  
9589 0710 5270 0161 1543 59  
Return Receipt \$3.35  
Tracking #:  
9590 9402 8350 3094 2020 28  
Total \$8.13

First-Class Mail® 1 \$0.63  
Letter  
Richmond Hill, GA 31324  
Weight: 0 lb 0.80 oz  
Estimated Delivery Date  
Thu 07/06/2023  
Certified Mail® \$4.15  
Tracking #:  
9589 0710 5270 0161 1543 73  
Return Receipt \$3.35  
Tracking #:  
9590 9402 8350 3094 2019 91  
Total \$8.13

First-Class Mail® 1 \$0.63  
Letter  
Richmond Hill, GA 31324  
Weight: 0 lb 0.80 oz  
Estimated Delivery Date  
Thu 07/06/2023  
Certified Mail® \$4.15  
Tracking #:  
9589 0710 5270 0161 1543 80  
Return Receipt \$3.35  
Tracking #:  
9590 9402 8350 3094 2019 84  
Total \$8.13

First-Class Mail® 1 \$0.63  
Letter  
Richmond Hill, GA 31324  
Weight: 0 lb 0.80 oz  
Estimated Delivery Date  
Thu 07/06/2023  
Certified Mail® \$4.15  
Tracking #:  
9589 0710 5270 0161 1543 73  
Return Receipt \$3.35  
Tracking #:  
9590 9402 8350 3094 2019 91  
Total \$8.13

First-Class Mail® 1 \$0.63  
Letter  
Richmond Hill, GA 31324  
Weight: 0 lb 0.80 oz  
Estimated Delivery Date  
Thu 07/06/2023  
Certified Mail® \$4.15  
Tracking #:  
9589 0710 5270 0161 1543 80  
Return Receipt \$3.35  
Tracking #:  
9590 9402 8350 3094 2019 84  
Total \$8.13

First-Class Mail® 1 \$0.63  
Letter  
Richmond Hill, GA 31324  
Weight: 0 lb 0.80 oz  
Estimated Delivery Date  
Thu 07/06/2023  
Certified Mail® \$4.15  
Tracking #:  
9589 0710 5270 0161 1543 97  
Return Receipt \$3.35  
Tracking #:  
9590 9402 8350 3094 2020 04  
Total \$8.13

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Grand Total: \$56.91  
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Credit Card Remit \$56.91  
Card Name: MasterCard  
Account #: XXXXXXXXXXXXX0272  
Approval #: 05695Z  
Transaction #: 263  
AID: A0000000041010 Contactless  
AL: MASTERCARD  
MASTERCARD  
-----

Text your tracking number to 28777 (2USPS)  
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Pembroke GA 31321

Certified Mail Fee	\$4.15	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$3.00	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$4.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$3.00	
<input type="checkbox"/> Adult Signature Required	\$3.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$3.00	
Postage	\$0.62	Postmark Here
Total Postage and Fees	\$2.12	

Sent to  
 Carter Infinger  
 St North Courthouse St  
 Pembroke GA 31321

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

9589 0710 5270 0161 1543 66

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Pembroke GA 31321

Certified Mail Fee	\$4.15	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$3.00	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$4.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$3.00	
<input type="checkbox"/> Adult Signature Required	\$3.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$3.00	
Postage	\$0.62	Postmark Here
Total Postage and Fees	\$2.12	

Sent to  
 Carter Infinger  
 St North Courthouse St  
 Pembroke GA 31321

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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Richmond Hill GA 31324

Certified Mail Fee	\$4.15	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$3.00	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$4.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$3.00	
<input type="checkbox"/> Adult Signature Required	\$3.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$3.00	
Postage	\$0.62	Postmark Here
Total Postage and Fees	\$2.12	

Sent to  
 Ben Taylor  
 Cpl Captain Matthew Freeman DL  
 Richmond Hill GA 31324

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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Richmond Hill GA 31324

Certified Mail Fee	\$4.15	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$3.00	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$4.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$3.00	
<input type="checkbox"/> Adult Signature Required	\$3.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$3.00	
Postage	\$0.62	Postmark Here
Total Postage and Fees	\$2.12	

Sent to  
 Chief Freddy Howell  
 Cpl Captain Matthew Freeman DL  
 Richmond Hill GA 31324

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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Richmond Hill, GA 31324

Certified Mail Fee	\$4.15
Extra Services & Fees (check box, add fee as appropriate)	\$4.75
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$4.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.52
Total Postage and Fees	\$9.12

Sent To: Chief Freddy Howell  
 Street and Apt. No., or P.O. Box No.: Capt. Matthew Freeman Dr  
 City, State, ZIP+4®: Richmond Hill GA 31324

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Richmond Hill, GA 31324

Certified Mail Fee	\$4.15
Extra Services & Fees (check box, add fee as appropriate)	\$4.75
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$4.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$1.52
Total Postage and Fees	\$10.12

Sent To: Ben Taylor  
 Street and Apt. No., or P.O. Box No.: Capt. Matthew Freeman Dr  
 City, State, ZIP+4®: Richmond Hill GA 31324

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

5270 0161 1543 97

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Richmond Hill, GA 31324

Certified Mail Fee	\$4.15
Extra Services & Fees (check box, add fee as appropriate)	\$4.75
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$4.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.00

Postmark Here

SHERIFF'S ENTRY OF SERVICE

FILED IN OFFICE
CLERK OF SUPERIOR COURT
BRYAN COUNTY, GEORGIA

Civil Action No. SUV2023000235

Superior Court [X]
State Court [ ]
Juvenile Court [ ]

Magistrate Court [ ]
Probate Court [ ]

SUV2023000235
CR

Date Filed 07/07/23 01:45 PM

JUL 07, 2023 01:45 PM

Attorney's Address Steffen, Jr., Joseph J
Joseph J Steffen Jr Law Office
223 W. York St.
Savannah, GEORGIA 31401-

Georgia, BRYAN
Bradbury, Sarah "Sam"

BRYAN COUNTY
Rebecca G. Crowe
Rebecca Crowe, Clerk
Bryan County, Georgia

Plaintiff

Name and Address of Party to be Served.
Bancroft, Shannon
66 Captain Matthew Freeman Dr.
Richmond Hill, GEORGIA 31324

VS.
Bryan County Fire and Emergency Services, DBA c/o

Carter Infinger, Bryan County Commission Chair; Howell,
Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

I have this day served the defendant Sent to Sheriff personally with a copy
of the within action and summons. 7/7/23

NOTORIOUS

I have this day served the defendant by leaving a
copy of the action and summons at his most notorious place of abode in this County.
Delivered same into hands of described as follows:
age, about years; weight pounds; height, about feet and inches, domiciled at the residence of
defendant.

CORPORATION

Served the defendant a corporation
by leaving a copy of the within action and summons with
in charge of the office and place of doing business of said Corporation in the County.

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the
door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the
same in the United States Mail, first class in an envelope property address to the defendant(s) at the address shown in said
summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the
place stated in the summons.

NON EST

Diligent search made and defendant
not to be found in the jurisdiction of this court.

This day of , 20

Deputy

SHERIFF'S ENTRY OF SERVICE

FILED IN OFFICE
CLERK OF SUPERIOR COURT
BRYAN COUNTY, GEORGIA
SUV2023000235
CR
JUL 07 2023 01:45 PM
Rebecca Crowe, Clerk
Bryan County, Georgia

Civil Action No. SUV2023000235

Superior Court [X]
State Court [ ]
Juvenile Court [ ]

Magistrate Court [ ]
Probate Court [ ]

Date Filed 07/07/23 01:45 PM

Georgia, BRYAN

Bradbury, Sarah "Sam"

Attorney's Address Steffen, Jr., Joseph J
Joseph J Steffen Jr Law Office
223 W. York St.
Savannah, GEORGIA 31401-

Plaintiff

VS.

Bryan County Fire and Emergency Services, DBA c/o

Name and Address of Party to be Served.
Bryan County Fire and Emergency Services

Carter Infinger, Bryan County Commission Chair; Howell,

Defendant

51 N. Courthouse St.

Pembroke, GEORGIA 31321

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

I have this day served the defendant personally with a copy of the within action and summons.

Sent to Sheriff
7/7/23

NOTORIOUS

I have this day served the defendant by leaving a copy of the action and summons at his most notorious place of abode in this County.

CORPORATION

Delivered same into hands of described as follows: age, about years; weight pounds; height, about feet and inches, domiciled at the residence of defendant.

Served the defendant a corporation by leaving a copy of the within action and summons with in charge of the office and place of doing business of said Corporation in the County.

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope property address to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

Diligent search made and defendant not to be found in the jurisdiction of this court.

This day of , 20

Deputy

SHERIFF'S ENTRY OF SERVICE

FILED IN OFFICE
CLERK OF SUPERIOR COURT
BRYAN COUNTY, GEORGIA
SUV2023000235
CR
JUL 07 2023 01:45 PM

Civil Action No. SUV2023000235

Date Filed 07/07/23 01:45 PM

Attorney's Address Steffen, Jr., Joseph J
Joseph J Steffen Jr Law Office
223 W. York St.
Savannah, GEORGIA 31401-

Superior Court [X]
State Court [ ]
Juvenile Court [ ]

Magistrate Court [ ]
Probate Court [ ]

Georgia, BRYAN
Bradbury, Sarah "Sam"

BRYAN COUNTY
Rebecca G. Crowe
Rebecca Crowe, Clerk
Bryan County, Georgia

Plaintiff

VS.

Bryan County Fire and Emergency Services, DBA c/o

Carter Infinger, Bryan County Commission Chair; Howell,
Defendant

Name and Address of Party to be Served.
Howell, Freddy
66 Captain Matthew Freeman Dr.
Richmond Hill, GEORGIA 31324

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL
NOTORIOUS
CORPORATION
TACK & MAIL
NON EST

[X] I have this day served the defendant of the within action and summons. Sent to Sheriff 7/7/23 personally with a copy

[ ] I have this day served the defendant by leaving a copy of the action and summons at his most notorious place of abode in this County.

[ ] Delivered same into hands of described as follows: age, about years; weight pounds; height, about feet and inches, domiciled at the residence of defendant.

[ ] Served the defendant a corporation by leaving a copy of the within action and summons with in charge of the office and place of doing business of said Corporation in the County.

[ ] I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope property address to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

[ ] Diligent search made and defendant not to be found in the jurisdiction of this court.

This day of , 20

Deputy