

**IN THE SUPERIOR COURT OF BRYAN COUNTY  
STATE OF GEORGIA**

**SUMMER PATTERSON,**  
Plaintiff

CIVIL ACTION NO.

v.

**Jury Trial Demanded**

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

**COMPLAINT AND JURY DEMAND**

Plaintiff Summer Patterson brings this action against Bryan County Fire and Emergency Services (“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); and 42 U.S.C. § 2000(e) et seq. (Title VII of the Civil Rights Act of 1964) 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 2018.
4. Plaintiff is the Division Chief for Emergency Medical Services, Emergency Management, and Administration for Bryan County Fire and Emergency Services (“BCFES”).

5. BCFES is the 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. Defendant Howell has served in this position since 2012.
10. Defendant Howell is a resident of Liberty County, Georgia.
11. He may be served with process during business hours at his office at the Bryan County Administration Building at 66 Captain Matthew Freeman Drive, Richmond Hill, Georgia.
12. BCFES is a county agency. Pursuant to the O.C.G.A. § 9-11-4, the County 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.
13. Service can be made upon County Manager Ben Taylor at 66 Captain Matthew Freeman Drive, Richmond Hill, GA 31324.
14. This Court has exclusive subject matter jurisdiction over the claims asserted herein under O.C.G.A. § 45-1-4.
15. 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.

16. 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).
17. At all times relevant to this lawsuit, Plaintiff was a “public employee” for purposes of O.C.G.A. § 45-1-4(a)(3).
18. 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).
19. As shown below, Chief Howell’s wrongful acts alleged herein were all willful, malicious, and corrupt and in violation of well-established law. Thus, Chief Howell is not entitled to any immunity by virtue of his employment, role, or job title.
20. All actions by Defendant have been retaliatory and discriminatory acts following actions by Plaintiff that were protected under Georgia Whistleblower Act.
21. GWA does not contain ante litem requirements.
22. Further, ante litem notices and statutory waivers of sovereign immunity are not required under Georgia law for intentional acts.
23. However, O.C.G.A. § 36-11-1’s county ante litem requirements state “*all* claims against counties must be presented . . .”
24. 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).
25. This service is also intended to preserve any current or future claims of negligence against Defendants.
26. Ante litem notices were sent via certified mail to Defendant Howell, as well as

Chairman Infinger and County Manager Taylor at the addresses listed above on July 3, 2023 (Ex. B).

27. Additionally, copies of all ante litem notices were delivered via email upon the County Attorney, Aaron Kappler.
28. Jurisdiction and venue are proper in this court.

**PARTIES**

29. Plaintiff began working for BCFES on or about August 2018 as an Emergency Management Specialist in a part-time capacity.
30. Plaintiff was promoted to Deputy Chief of Emergency Management and Division Chief of EMS in June 2021.
31. At this time, she assumed control and oversight of EMS Education.
32. Ms. Patterson received her EMT certification in 1997, Paramedic certification in 2004, and became an EMT Instructor in 2005.
33. Patterson has a bachelor's degree in Emergency and Disaster Management.
34. In February 2022, Plaintiff was again promoted: this time to Division Chief for EMS, EMA, and Administration.
35. Ms. Patterson's responsibilities, duties, and assignments include:
  - Manages, coordinates, and monitors administrative functions for the department as well as work involving Emergency Management Agency and Emergency Medical Services;
  - Reviews and/or formulates policies, programs and procedures for EMA and EMS Operations;
  - Assists with the development, update, and implementation of plans, policies, and programs to improve Bryan County's ability to mitigate, respond, and recover from all emergencies, and disasters;
  - Manages EMS licensing;
  - Oversees the SOEMS learning management system;
  - Maintains maintain the necessary hours to satisfy the department and state training requirements in EMA and EMS;

- Oversight and responsibility for all personnel categorized as “126 employees;”
- Formulating policies, programs and procedures for EMS Operations;
- Managing all EMS licensing, equipment supplies, storage, and billing.
- Setting goals for the department;
- Establishing policies and procedures, professional development, handling grievances, and disciplining subordinates;
- Preparing the budget, grant management, policy and rule development;
- Oversight of emergency and non-emergency operational functions;
- Managing EMS licensing and regulations, and ensuring that department policies and procedures are followed;
- Supervises the work of department personnel.
- Responds to, supervises emergency response for EMS service calls, and provides emergency medical care as needed.
- Supervises emergency response for fire service calls as needed
- Conducts personnel administration activities within the department, including recruiting, interviewing, hiring, and evaluating performance.
- Develops and implements policies governing emergency management, patient care, employee activities and conduct;
- Provides direction and oversight of the medical controlled substance inventory. Ensures the controlled substance program complies with federal regulatory requirements. Directly oversees the licensing process for the Drug Enforcement Agency (DEA), Clinical Laboratory Improvement Amendments (CLIA) and Georgia State Board of Pharmacy.
- Manages all EMS equipment, supplies, medical controlled substances and storage. Works in conjunction with and is directly responsible for the Quartermaster, oversees vendors for EMS equipment and supplies.
- Develops plans for major EMS equipment purchases. Manages inventory and/or accountability of EMS equipment and supplies.
- Monitor the following certifications: Basic Life Support Provider, Advanced Cardiac Life Support Provider, Pediatric Advanced Life Support Provider, Advanced Medical Life Support Provider, Prehospital Trauma Life Support Provider, and Geriatric Education for Emergency Medical Services.
- Ensure compliance by all EMS staff members to the National Registry or Department of Public Health/Office of EMS requirements for recertification of EMS personnel.
- Provides training on any new equipment that will be used for patient care and carried on any Bryan County Emergency Services vehicle, including computer systems and software.
- Ensures accuracy of financial management by maintaining time records and payroll information by collecting, calculating, and entering data for payroll submission and issuing and distributing of paychecks.
- Investigates EMS complaints/grievances from department personnel, patients and/or their families, and government officials.
- Develops the department-operating budget specific to Emergency Medical

Services and Emergency Management, submits bids and approves purchases, and maintains records of expenditures and revenue.

- Works with department members and Purchasing Department on procurement and vendor selections for services and goods.
- Works with the Training Division in the planning and development of Advanced (ALS) and Basic (BLS) Life Support level EMS training for all fire department staff.
- Oversees the departments CQI (continuous quality improvement) program to ensure compliance with established medical guidelines and procedures relating to patient care.
- Serves as the contact person for the department's Medical Director. Works with the Medical Director on political and operational issues that affect the department. Facilitates the relationship between the Training Division and the Medical Director.
- Coordinates with Training Officer to provide training on any new protocol and/or procedure that is implemented by the Medical Director and to provide for communication between Medical Director and Emergency Services staff.
- Writes ambulance unit specifications, establishes a bidder list and directs the bid process.
- Participates in professional development activities and meetings as needed; represent the department at local, state and regional meetings.
- Assists in brokering social service resources as necessary.
- Develops relationship with Bryan County Sheriff's Office for district response to special issues with citizens.
- Monitors the national fire/EMS media to determine industry trends, new technologies and emerging issues.
- Reviews and analyzes reports, such as revenue and performance records, to secure information for recommended changes. Reviews cost statements to locate excessive expenses and develops plans, policies and budgets.
- Ensures compliance with federal, state and local safety and health requirements.
- Participates in regional EMS functions.
- Ms. Patterson has extensive experience and training in the following:
  - a. EMS and EMA systems, including emergency dispatch/communication procedures and the National Incident Management System;
  - b. Ensuring operational readiness of existing Flood Hazard Mitigation plans, Local Emergency Operations Plans and Debris Management plans;
  - c. National, state, county, and department policies and procedures; and
  - d. County employment rules, EMS and EMA training, including the rules and regulations, and applicable federal, state and local statues applicable to Emergency Management, Emergency Medical Services, and Fire Services;

36. Ms. Patterson has qualifications and certifications in:

- NPQ Firefighter I
- NPQ Hazardous Materials Operations
- NIMS 100 thru 400
- NREMT(State) Paramedic Certification.
- Georgia DPH EMS Instructor/Coordinator (Paramedic)
- Advanced Certified Emergency Manager
- State/National EMT and Paramedic Certifications

37. Ms. Patterson has always received favorable reviews and performance evaluations.
38. Ms. Patterson was selected for her position because she was the only person with the above qualifications.
39. Patterson has served as the point of contact and agency liaison for multiple local, state, regional, and national agency relationships, and operational contracts.
40. Patterson interacts with all divisions and county offices representatives.
41. Defendant Howell is the chief executive officer of the fire department.
42. Upon the receipt of reports from subordinate officers or the public of any violation of laws or ordinances, rules and regulations, or orders governing the department, he shall promptly investigate or cause to be investigated such reports and to follow them with the necessary and appropriate action.
43. He or she shall assure that department officers maintain the highest standards in the performance of their duties, and a proper supervision of subordinates under their authority, and that no partiality, favoritism, or unfairness is shown, or any injustice done.
44. Defendant Bancroft is one of two division chiefs immediately under Defendant Howell.

45. Defendant Howell grants all authorities and permissions to Defendant Bancroft.
46. All actions by Defendant Bancroft are under the color of Defendant Howell.
47. Individually and through the County Attorney, Patterson has reported discriminatory, retaliatory, and harassing behavior to her supervisor, human resources, and/or County officials.
48. Patterson's supervisor, human resources, and/or County officials (by and through the County attorney) have received notice of discriminatory, retaliatory, and harassing behavior.
49. Patterson's supervisor, human resources, and County officials and administrators have failed to act on the reports of harassment, discrimination, and retaliation.
50. Patterson'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. Defendants' actions, failures, and omissions violate the Bryan County Personnel Manual as well as local, state, and federal laws.
51. Many retaliatory actions were not immediate due to Ms. Patterson taking time off to avoid Defendant Howell, in addition to work duties and travel that kept them from working together on continuous days.
52. Causal connection exists between Ms. Patterson's protected reporting and retaliatory actions by Defendants.

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



53. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.
54. 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. Patterson learns of life/safety concerns for Bryan County citizens and BCFES first responders:*

55. In her capacity as Division Chief, Ms. Patterson was responsible for personnel administration activities, including recruiting, interviewing, hiring, and evaluating performance.
56. In this capacity, Ms. Patterson received multiple reports regarding Battalion Chief “H”, including missing calls due to sleeping on the job, not responding to emergency calls, failing to ensure her stations had needed supplies, failed to timely submit reports, multiple failures to schedule her shift, and even flashing her Battalion Chief (“BC”) badge to a Georgia State Patrol officer while representing herself as the “assistant fire chief” in efforts to get her domestic partner out of a ticket or arrest.
57. Ms. Patterson knew and genuinely believed that sleeping on the job and failure to respond to emergency calls placed Bryan County citizens and BCFES first responders in danger.
58. In April 2023, Ms. Patterson was ordered by Defendant Howell to investigate this issue.
59. Multiple employees verified the information that had previously been reported

to Ms. Patterson.

60. Defendant Howell ordered Plaintiff and Division Chief Shannon Bancroft to inform BC “H” that she would be demoted.
61. Human Resources Manager Mr. Johnson agreed that enough evidence existed for BC “H” to be demoted.
62. Within a few days of Plaintiff and Division Chief Bancroft informing the battalion chief of their demotion due to the findings of the investigation, Defendant Howell refused to follow through with the demotion and removal BC “H” despite overwhelming evidence that BC “H” actions placed Bryan County citizens and first responders at significant risk of harm.
63. Defendants had actual knowledge that the battalion chief’s actions placed Bryan County citizens and BCFES first responders at significant risk of harm yet failed to act on it.
64. Following Ms. Patterson objections regarding BC “H” and the life/safety issues caused by her actions, Defendant Howell yelled, verbally assaulted, and cursed at Ms. Patterson on multiple occasions.
65. Defendant Howell had a pattern of yelling and verbally assaulting Ms. Patterson and others.

*Discrimination and falsifying public records occur in battalion chief promotion scoring; Ms. Patterson objects and also raises the life/safety issues again.*

66. On or about May 8, 2023, Ms. Patterson was present when Defendant Howell and Division Chief Bancroft manipulated the promotion scoring numbers for battalion chief positions.
67. The manipulation of those numbers caused Sam Bradbury to be placed at the

bottom of the promotion list.

68. Bradbury had been serving as interim battalion chief position prior to the promotion list being made public.
69. Bradbury was qualified and capable to serve in that position.
70. Bradbury was the only openly gay female in BCFES.
71. Bradbury was also open about her mental health journey.
72. In March 2023, Bradbury notified Defendant Howell and Division Chief Bancroft that she'd received reports of a BCFES lieutenant sexually assaulting and harassing recruits, as well as strongly smelling alcohol while on duty.
73. Bradbury was placed at the bottom of the scoring list due to retaliation and discrimination.
74. At that meeting, Ms. Patterson, acting in her capacity as Division Chief, objected to Defendant Howell regarding (1) the discrimination and retaliation against Bradbury, and (2) the life/safety and liability issues with BC "H", and Defendant Howell not demoting her.

*Defendant Howell retaliates against Patterson and saddles her with at least 30 hours/week of additional duties.*

75. While discussing Ms. Patterson's objections to the favoritism for a battalion chief who was putting lives at risk and the discrimination Ms. Patterson witnessed in ranking employees for upcoming promotions, Defendant Howell became upset.
76. Visibly angry that Ms. Patterson dared speak negatively about his discriminatory and life-threatening choices, Defendant Howell stated "You're now in charge of ImageTrend."

77. ImageTrend is a software that tracks equipment and fire/EMS units and ensures Bryan County gets paid for conducting transports of patients.
78. ImageTrend was deployed by, and has only been managed by, one BCFES employee since the County purchased it.
79. Ms. Patterson has never been responsible for ImageTrend.
80. ImageTrend requires approximately 20-30 hours per week of maintenance, not including after-hours or weekend requirements.
81. The ImageTrend manager is also responsible for ensuring compliance and licensing of the product is maintained through the State of Georgia.
82. Defendant Howell was aware of these requirements and significant workload.
83. By placing an additional requirement to work 20-30+ hours per week onto Ms. Patterson, Defendant Howell was retaliating against her.
84. By placing an additional requirement to work 20-30+ hours per week onto Ms. Patterson, Defendant Howell was setting her up for failure knowing it would be impossible and in violation of Fair Labor standards for Plaintiff to work that many hours per week.
85. By giving Ms. Patterson responsibility for the software, Defendant Howell was removing other duties and responsibilities from her in furtherance of his retaliation.
86. Following Ms. Patterson's protected reporting of these issues, Defendant Howell told the original ImageTrend manager to "keep doing the numbers" and they "only wanted redundancy in the event something happened to him."
87. This was not discussed with Ms. Patterson, whom ImageTrend apparently now belonged to.

88. This was a thinly veiled attempt by Defendant Howell's to make his ImageTrend decision not appear as retaliation. This is acknowledgment that his previous behavior was indeed retaliatory.

*A \$100,000 matter of public concern is committed by Howell in attempts to retaliate against Ms. Patterson.*

89. On or about May 18, 2023, Defendant Howell made an abrupt decision to move a paramedic class from Station 1 to Station 9.

90. Defendant Howell required Ms. Patterson to make this change.

91. This classroom at Station 1 had received accreditation through Committee on Accreditation for EMS Professionals (CoAEMSP).

92. Ms. Patterson was responsible for securing this accreditation, through months of site visits, updating of policies and compliance, and other CoAEMSP requirements.

93. At the time of accreditation as a satellite location, CoAEMSP informed Ms. Patterson that it would take approximately 45-60 days for any future accrediting of locations within the County.

94. This accreditation was sought in efforts to have more qualified paramedics in Bryan County.

95. By having a satellite location in the County, the overtime pay was reduced from being 176% in May 2022 down to just 35% in May 2023.

96. By not having to pay travel or class fees for paramedics to be trained in other locations, accreditation of the satellite location saved the County nearly \$100,000.

97. Defendant Howell's rash decision to move the training classroom even though

he lacked knowledge of the cost, savings, or accreditation requirements put the County at risk of wasting tens of thousands of dollars. For the prior class, the savings were nearly \$80,000. Ms. Patterson reasonably believed this retaliatory decision was an abuse of taxpayer funds.

98. Further, Defendant Howell knew this would cause extra work for Ms. Patterson.

99. Defendant Howell's actions were retaliatory to keep Ms. Patterson from her from her supervisory responsibilities.

100. No prior conversations about moving the class had occurred.

101. It was not until after Ms. Patterson engaged in protected activities under GWA that Defendant Howell began gathering information on the requirements to move the class.

102. In effect, Defendant Howell's reasons for going around Ms. Patterson were attempts to establish a pretextual reason for moving the class.

103. Further, in attempts to establish those pretextual reasons, Defendant Howell went around the authorities and permissions he had previously placed on Ms. Patterson.

104. Defendant Howell's actions were retaliatory.

*Ms. Patterson reports matters of life/safety, waste/abuse, and Defendant Howell's retaliation to government officials. Howell retaliates even more.*

105. Ms. Patterson disclosed violations or noncompliance with a law, rule, or regulation to her supervisors and a government agency.

106. Ms. Patterson also 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.

107. Plaintiff's reporting of, and objecting to, these violations led to harassment, discrimination, and retaliation by Defendant Howell.
108. Genuinely fearing for the lives, safety, health, and welfare of Bryan County citizens and BCFES first responders being at risk of harm or death, Plaintiff retained counsel.
109. Plaintiff's counsel disclosed Defendants' violations or noncompliance with a law, rule, or regulation to Defendant Bryan County's attorney, who in turn informed Chief Howell and other relevant and/or necessary parties.
110. On June 4, 2023, Defendant Bryan County's attorney confirmed he had spoken with Defendant Howell and others.
111. Thus, by June 4, 2023, Defendants had notice of Ms. Patterson's reporting.
112. Since that time, Defendants have engaged in repeated, ongoing, and continuous adverse employment actions against Ms. Patterson.
113. These actions are removals of all authorities and permissions from her purview and placing them under the other Division Chief's umbrella.
114. To date, changes in job titles, roles, or responsibilities have not directly been discussed with Ms. Patterson.
115. Rather, Ms. Patterson gets notified of these changes when she receives department-wide emails stating that responsibilities or duties have been removed from her command.
116. These actions and removals have never happened prior to Ms. Patterson's reporting of issues, which is protected activity under GWA.
117. Adverse actions that have occurred against Ms. Patterson since early June include:

- a. Defendant Howell now questioning how Ms. Patterson knows certain information.
- b. Defendant Howell approaching other employees following their conversations with Ms. Patterson and asking them “if they’re ok.”
- c. Defendant Howell passive aggressively emailing her copies of Division Chief Bancroft’s job description with certain portions highlight, trying to indicate that a job duty she had been ordered to do from the time she was promoted in Nov. 2021 was now no longer hers. HR Director Mr. Johnson was also cc’d on this email, thus he was aware of the Defendant Howell’s removal of responsibilities from Ms. Patterson.
- d. Defendant Howell having the administrative assistant review the County’s 2023 Hurricane Plan rather than Ms. Patterson – who is the County’s Emergency Management Chief!
- e. No longer allowing Ms. Patterson to shift EMS personnel, who have always been under her command and authority.
- f. Ms. Patterson tells HR Manager Johnson that she was afraid of Defendant Howell. Johnson replies that “they just need to talk.”
- g. Defendant Howell retaliates against Ms. Patterson by removing a job opportunity from her friend, another battalion chief in BCFES.
- h. That battalion chief had been offered and promised a full-time position as EMA Specialist beginning in July.
- i. Defendant Howell retaliated against Ms. Patterson by hurting her friend and colleague by changing that position to part-time, making it impossible for that battalion chief to accept such a significant loss in hours.



- j. Ms. Patterson learns of this through the job posting on the Bryan County website.
- k. Despite being the Division Chief for *Administration* and having handled this job since her first day as Division Chief, Ms. Patterson has now been removed from the recruiting and hiring of administrative personnel.
- l. Ms. Patterson was cc'd on a department-wide email from Division Chief Bancroft to Payroll stating that all battalion chiefs needed to be removed from Ms. Patterson's reporting chain and ADP oversight. HR Director Johnson and Defendant Howell were also cc'd on this email. Thus, these retaliations were approved and/or allowed by them.
- m. Ms. Patterson has been removed from all personnel issues and items related to 126 employees, who are her direct reports.
- n. While at a meeting in a neighboring county, Ms. Patterson was informed by an EMS Training Coordinator that Defendant Howell had requested a meeting with him, presumably to bypass Ms. Patterson to discuss EMS training. This was a relationship and responsibility always held by and between Ms. Patterson and the EMS Training Coordinator. The only reasons Chief Howell would need to maintain this relationship is if he planned to remove Ms. Patterson from her position or remove those authorities from her.
- o. Without notifying Ms. Patterson, who had achieved the CoAEMSP designation for BCFES to be a Rescue Training satellite location, Chief Howell contacted the CoAEMSP persons and told them that the move to the new location was temporary. This was Defendant Howell's way of both going

around Ms. Patterson while also attempting to remedy his previous retaliation. This is acknowledgment that his previous behavior was indeed retaliatory and rash.

- p. As the EMS Chief, Ms. Patterson is in charge of training EMS personnel and formed the FTO program to direct them as to what training needs to be arranged for shift training. Now, Defendant Howell and Bancroft are going to other lieutenants in the agency to put together shift training.
- q. Defendant Howell is having other members of the agency review and edit negative letters and information about Ms. Patterson in efforts to disparage her.
- r. Defendant Howell is telling others in the agency that another lieutenant is doing Ms. Patterson's job, which are also attempts to disparage her. That lieutenant acts as Ms. Patterson's training captain, which was approved and known by Defendant Howell and Bancroft for at least a year.
- s. In addition to the items listed above, and despite being the Division Chief of *Adminisitration*, Defendant Howell recently instructed an administrative assistant to comb resumes for the new EMA position. Specifically, and even more shockingly, Chief Howell instructed that person to look up the applicants online and only pick ones that were "25-35 [years old], female, and attractive." This statement creates a toxic work environment and a culture of sexual harassment. Further, this statement constitutes age discrimination, which is a violation of local, state, and federal law.
- t. Defendant Howell recently hired a new Emergency Management specialist. Despite being the Division Chief of Emergency Management, having a

degree in emergency management, and having served in the emergency management leadership capacity at BCFES for years, Ms. Patterson had no input or participation in reviewing resumes, interviewing, or hiring the new EM specialist.

- u. Interviews for the new emergency management position were kept secret from Ms. Patterson. Additionally, others were instructed to keep this information from Ms. Patterson, despite her being the Division Chief of Emergency Management.
- v. Upon hire, the new emergency management specialist had no idea that Ms. Patterson was the Division Chief of Emergency Management. Thus, it's reasonable to believe the Defendant Howell did not disclose this chain of command information to the new hire. Further, it's reasonable to infer that Defendant Howell is setting up the organizational structure to remove this responsibility from Ms. Patterson, despite her starting her employment with BCFES in Emergency Management, having a degree in it, and serving as Division Chief over the division.
- w. The new EM specialist is now doing EM speaking engagements on behalf of BCFES without Ms. Patterson's knowledge or input.
- x. EM speaking engagements had always been conducted or coordinated by Ms. Patterson for the last several years.

*BCFES constructively terminates Ms. Patterson.*

118. On or about June 30, 2023, following months of retaliation and Defendant Howell removing her job duties and responsibilities, Ms. Patterson resigned from BCFES.

119. The toxic work environment became detrimental to her mental and physical health.
120. Defendants had removed her job responsibilities and reassigned her to menial, degrading tasks.
121. Defendants reassigned her work duties to less experienced personnel.
122. Harassment, humiliation, and retaliation by Defendants encouraged Ms. Patterson's resignation.
123. Defendants created and allowed a toxic, unsustainable work environment.
124. Importantly, Ms. Patterson believed the toxic environment could lead to dangerous outcomes for herself, other BCFES employees, and the citizens of Bryan County.
125. Ms. Patterson reasonably could lose her above-listed accreditations and certifications.
126. Loss of those accreditations and certifications could yield loss of earning potential and/or require years of education to become re-certified.

### **CLAIMS**

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

127. Plaintiff re-alleges and incorporates the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.
128. O.C.G.A. § 45-1-4 declares it unlawful for a public employer to 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.
129. The law also prohibits retaliation against any public employee for "objecting to,

or refusing to participate in, any activity, policy, or practice of the public employer that the public employee has reasonable cause to believe is in violation of or noncompliance with a law, rule, or regulation.” O.C.G.A. § 45-1-4(d)(3).

130. The County has retaliated against Ms. Patterson for her whistleblowing reporting, in violation of O.C.G.A. § 45-1-4(d).
131. Plaintiff’s objections, disclosures, and reporting were protected because they objected to and disclosed activities that violated local, state, or county laws, rules, procedures and regulations.
132. Further, Plaintiff’s objections, disclosures, and reporting were related to matters of public concern regarding lives, safety, health, and welfare of Bryan County citizens as well as first responders employed by BCFES.
133. 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, the County, and/or the State of Georgia, as well as caused breaches of other contracts, accrediting authorities, credentialing, or licensing requirements. Such reports included, but are not limited to:
  134. BCFES retaliated against Ms. Patterson due to her objections and reporting of the violations of local, county, or state laws, rules, procedures, and regulations.
  135. As a result of Chief Howell’s retaliation against her, Ms. Patterson has suffered lost benefits, harm to her career, and other general and special damages in an amount to be proven at trial.
136. Many of Chief Howell’s wrongful acts 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.

137. BCFES has a policy and culture under which employees are to report everything to Chief Howell and Bancroft and not go outside the “chain of command,” thus keeping grievances inside the agency, to the extent possible.

138. 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.

139. Ms. Patterson 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**

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

141. Ms. Patterson’s disclosures, objections, and reporting were matters of public interest and concern.

142. Ms. Patterson reported violations through retained counsel (after reporting through proper supervisory and agency channels) to bring attention to life/safety risks for the citizens of Bryan County, which are major issues of public concern.

143. By retaliating against Ms. Patterson for reporting or disclosing a violation of, or noncompliance with, a law, rule, or regulation to either a supervisor or a government agency, Chief Howell and the County, under color of law, caused Ms. Patterson 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.
144. In retaliating against Ms. Patterson for exercising her First Amendment rights, Chief Howell was acting under color of law.
  145. In retaliating against Ms. Patterson for exercising Ms. Patterson's First Amendment rights, Chief Howell was exercising his discretionary power.
  146. In retaliating against Ms. Patterson for exercising Ms. Patterson's First Amendment rights, Chief Howell violated a right that was clearly established at the time.
  147. In retaliating against Ms. Patterson for exercising Ms. Patterson's First Amendment rights, Chief Howell was acting in furtherance of a general County custom and policy.
  148. In retaliating against Ms. Patterson for exercising Ms. Patterson's First Amendment rights, Chief Howell was acting as the final policy-making authority for the County with respect to promotion of firefighters within the Fire Department.
  149. Ms. Patterson's speech was a matter of public concern.
  150. The lives, health, safety, and welfare of Bryan County citizens outweighs any County interest in prohibiting speech to promote the efficiency of public services.
  151. Ms. Patterson's disclosures and reporting played a substantial part in Chief Howell's retaliations and decisions to remove duties and authorities from Ms. Patterson.

152. Ms. Patterson is entitled to and demands judgment in her favor on this Count and remedies for the Defendants' violation of her civil rights, including compensatory damages, pre-judgment and post-judgment interest, punitive damages, and attorneys' fees, litigation expenses, and costs, as well as all other remedies available under the law.

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

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

154. Plaintiff has suffered extreme stress, anxiety, insomnia, and related physical symptoms since Defendants began retaliating against her.

155. Plaintiff has taken a significant amount of vacation days, sick days, and personal time off to avoid the retaliation, toxic work environment, and emotional distress caused by the intentional acts of Defendants.

156. Defendants' intentional, willful, and malicious actions are extreme and outrageous.

157. Defendants' actions are the cause of Plaintiff's emotional distress.

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

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

159. Defendant Bryan County had actual knowledge of the hostile work environment, discrimination, harassment, and retaliation.

160. 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.
161. Defendant Howell had actual knowledge of the hostile work environment, discrimination, harassment, and retaliation.
162. Defendants' administrators, employees, and agents with actual knowledge of Ms. Patterson's reports had the authority and ability to investigate and take meaningful corrective action to remediate the harassment, discrimination, and hostile environment suffered by Ms. Patterson, but failed to do so.
163. Defendants willfully, wantonly, and consciously disregarded Plaintiff's reports.
164. Defendants' actions, or inactions, created a climate in which harassment, discrimination, and hostile environment were tolerated.
165. 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**

166. Plaintiff re-allege and incorporate the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.
167. Ms. Patterson suffered sex discrimination prohibited by Title VII.
168. Defendant had actual knowledge of the Plaintiff's sexual harassment and discrimination claims.

169. Defendants had actual knowledge of the hostile environment Ms. Patterson continued to suffer after reporting sexual harassment and discrimination.
170. Defendant's administrators, employees, and agents with actual knowledge of Ms. Patterson's many 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.
171. Defendant's actions, or inactions, created a climate in which sexual harassment, torment, and bullying BCFES employees was tolerated.
172. 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. Patterson and others of their clearly established federal rights and Constitutional rights.

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

173. Plaintiff re-allege and incorporate the allegations contained in all prior paragraphs of this Complaint as if fully alleged herein.
174. 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.
175. 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.
176. Defendant failed to follow its outlined timelines or conduct investigations in a

timely manner when investigating the sexual harassment claims.

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

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

179. As a direct and proximate result of Defendant's actions, and inactions, Ms. Patterson suffered, and continues to suffer, injuries including, but not limited to emotional distress, psychological trauma, and mortification.

**COUNT SEVEN: FAILURE TO TRAIN**

180. 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.

181. Upon information and belief, at all times relevant hereto, Defendants did not train employees on Title VII rights and obligations.

182. Defendant's failure to train its employees, administrators, and staff effectively denied Ms. Patterson and other BCFES employees of their clearly established federal rights and Constitutional rights.

183. As a direct and proximate result of Defendants' actions, and inactions, Ms. Patterson has suffered, and continues to suffer, injuries including, but not limited to emotional distress, psychological trauma, and mortification.

**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  
brandy@joesteffen.com  
223 W. York St.  
Savannah, GA 31401  
call/text: (910) 580-0380  
fax: (912) 298-5566

# 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

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

To Whom It Will Concern,

Our office has been retained to represent **Summer Patterson**, Division Chief of Emergency Medical Services, Emergency Management, and Administration for Bryan County Fire and Emergency Services in an action against BCFES and Chief Freddy Howell (in his 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. Patterson 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 and Chief Freddy Howell violated Ms. Patterson'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.

Bryan County Fire and Emergency Services and Chief Freddy Howell have retaliated against my client on a frequent and ongoing basis since she engaged in protected whistleblower activities Ms. Patterson engaged in protected activity by making complaints and objections 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 Patterson 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, assault, and Title IX violations; 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; constructive dismissal; 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 Summer Patterson

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)



# EXHIBIT B



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
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Tracking #:			
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Richmond Hill, GA 31324			
Weight: 0 lb 0.80 oz			
Estimated Delivery Date			
Thu 07/06/2023			

total

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Pembroke, GA 31321  
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Total \$8.13

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Total \$8.13

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Total \$8.13

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Tracking #:  
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Total \$8.13

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Richmond Hill, GA 31324  
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Estimated Delivery Date  
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Return Receipt \$3.35  
Tracking #:  
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Total \$8.13

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Richmond Hill, GA 31324  
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Total \$8.13

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Account #: XXXXXXXXXXXXX0272  
Approval #: 05695Z  
Transaction #: 263  
AID: A0000000041010 Contactless  
AL: MASTERCARD  
MASTERCARD  
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<input type="checkbox"/> Return Receipt (electronic)	\$4.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$4.00	
<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 Infirmer  
 St North Courthouse St  
 Pembroke GA 31321

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<input type="checkbox"/> Return Receipt (electronic)	\$4.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$4.00	
<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  
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Postage	\$0.62	Postmark Here
Total Postage and Fees	\$2.12	

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 Cpl Captain Matthew Freeman DL  
 Richmond Hill GA 31324

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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

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<input type="checkbox"/> Return Receipt (electronic)	\$4.00
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<input type="checkbox"/> Adult Signature Required	\$4.00
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Postage	\$0.52
Total Postage and Fees	\$2.12

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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Postage	\$1.52
Total Postage and Fees	\$2.12

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

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<input type="checkbox"/> Certified Mail Restricted Delivery	\$3.00
<input type="checkbox"/> Adult Signature Required	\$4.00
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