

The Law Offices Of
GREEN, JOHNSON, MUMINA & D'ANTONIO
Attorneys and Counselors At Law

The Metropolitan Building
400 North Walker Avenue, Suite 100
Oklahoma City, Oklahoma 73102
t. (405) 488-3800 • f. (405) 488-3802
www.gjmlawyers.com • cynthia@gjmlawyers.com

FILED

2014 NOV 3 PM 4 32

CITY OF
OKLAHOMA CITY, OKLA
OFFICE OF
CITY CLERK

November 3, 2014

VIA HAND DELIVERY
The City of Oklahoma City
c/o City Clerk's Office -Claims
200 N. Walker Ave, 2nd Floor
Oklahoma City, Oklahoma 73102

NOTICE OF TORT CLAIM

Pursuant to Title 51 O.S. § 156 (D), each of you are hereby notified of a personal claim of loss for the following:

Claimant's Name: Demetria Michelle Campbell
Claimant's Address: c/o Green Johnson Mumina & D'Antonio
400 N. Walker Ave., Suite 100
Oklahoma City, Oklahoma 73102
Claimant's Telephone: (405) 488-3800
Claimant's Facsimile: (405) 488-3802

****** Pursuant to Rule 4.2 of the Oklahoma Rules of Professional Conduct, please make note that all communications intended for Demetria Michelle Campbell should be directed to her attorney, Cynthia Rowe D'Antonio.**

Defendant City of
OKC, CIV-16-184-HE
27
exhibitsclerk.com

CLAIMS

The date, time, place and circumstances of the claim asserted is as follows:

A. This claim is asserted by and on behalf of Demetria Michelle Campbell (hereinafter "Claimant"), a forty-five year old African American female, for damages, resulting from physical assault and battery, false arrest, and excessive force exhibited by Oklahoma City Police Officer Daniel Holtzclaw on or about the fifth (5th) day of November, 2013.

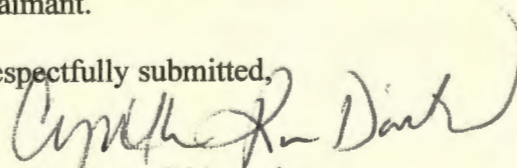
Without provocation or sufficient justification, Police Officer Daniel Holtzclaw, a member of the Oklahoma City Police Department, willfully and unlawfully exhibited excessive force, and assault and battery upon Demetria Michelle Campbell by grabbing her person and slamming her into a vehicle causing contusions to her head and face, right shoulder and right wrist. Ms. Campbell had not violated any laws to warrant Officer Holtzclaw pulling her vehicle over in the first instance. After causing her physical and emotional injury, Officer Holtzclaw released Ms. Campbell without making an official arrest. Ms. Campbell was never advised as to what unlawful act she had committed which would justify detention by Officer Holtzclaw. Unbeknownst to Ms. Campbell, Officer Holtzclaw had targeted numerous other middle-aged Black women driving through the east side of Oklahoma City.

B. The undersigned legal counsel, on behalf of the Claimant, is the authorized agent regarding this claim, and will provide, upon request where necessary, all other information with respect to additional reporting requirements, including Medicare Secondary Payer Mandatory Reporting Provisions in Section 111 of the Medicare, Medicaid and SCHIP Extension Act of 2007 (MMSEA) through the Centers for Medicare and Medicaid Services (CMS). Upon information and belief, Claimant is not subject to the provisions of MMSEA or CMS, for purposes of this claim.

C. Claimant seeks damages in the amount of not less than One Hundred Fifty Thousand Dollars (\$150,000.00) or that amount allowed by law, whichever amount is greater, for each act and occurrence, in the form of and/or as a result of the claim asserted, to include attorney fees, costs and interest.

Please be further advised that nothing contained herein shall be construed as a waiver or estoppel on behalf of the Claimant to commence litigation or seek redress for damages against any agency, employee or agent in their individual capacity, who may be otherwise liable for the damages asserted by Claimant.

Respectfully submitted,



Cynthia Rowe D'Antonio
Attorney At Law

cc: Demetria Michelle Campbell

The name, address, and telephone number of the authorized agent to settle this claim is as follows:

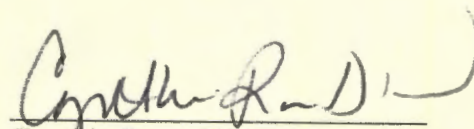
Cynthia Rowe D'Antonio, OBA #19652
GREEN JOHNSON MUMINA & D'ANTONIO
400 North Walker Avenue, Suite 100
Oklahoma City, Oklahoma 73102
Email: cynthia@gjmlawyers.com
(405) 488-3800 (Telephone)
(405) 488-3802 (Facsimile)

RESPECTFULLY SUBMITTED this 3rd day of November, 2014.

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day November 2014, a true and correct copy of the above and foregoing NOTICE OF TORT CLAIM was hand-delivered to:

Clerk for The City of Oklahoma City
200 N. Walker Ave., 2nd Floor
Oklahoma City, Oklahoma 73102
Via Hand-Delivery



Cynthia Rowe D'Antonio