McPhillips Shinbaum, L.L.P.

Luck, Bodin & Sawyer

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Mailing Address Post Office Box 64 Montgomery, Alabama 36101

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James G. Bodin

K. David Sawyer Andrea Hatchcock

> 516 SOUTH PERRY STREET MONTGOMERY, ALABAMA 36104 (334) 262-1911 / (866) 224-8664 FAX (334) 263-2321

> > March 30, 2023

Via Electronic & U.S. Mail bblalock@montgomeryal.gov

Ms. Brenda Gale Blalock City Clerk City Hall 103 North Perry Street Montgomery, Alabama 36104

RE:

Mr. Charles Lee NOTICE OF CLAIM

Dear Ms. Blaylock:

Pursuant to Ala. Code (1975) §§ 11-47-123 and/or 11-47-192, please find enclosed the Notice of Claim filed with your office today by Mr. Charles Lee.

Please return a copy indicating the receipt by your office in the enclosed addressed stamped envelope.

Respectfully yours,

David Sawyer
K. David Sawyer

Enclosures

cc: Charles Lee

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RE:

Mr. Charles Lee NOTICE OF CLAIM

Dear City Clerk:

Aaron J. Luck

James G. Bodin

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Of Counsel Attorneys

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Julian L. McPhillips, Jr.*

Pursuant to Ala. Code (1975) §§ 11-47-123 and/or 11-47-192, I verify the following Notice of Claim against the City of Montgomery.

On or about February 21, 2023, and thereafter, the City of Montgomery's Mayor Steven Reed made defamatory and slanderous statements against me, resulting in damage to my character and personality, and causing injury to me personally and to my reputation, profession, trade, or business. More specifically, Mayor Steven Reed made each of the following defamatory and slanderous public statements against me:

- 1. Being here today is because of an extortion attempt on the mayor of this city, by a man by the name of Charles Lee.
- 2. Charles Lee, owner and founder of That's My Dog and That's My Child, had not only recorded the audio but used it to extort me.
- 3. Charles Lee's extortion attempt during the George Floyd aftermath was one of the most despicable and disgusting acts of cowardice I have ever heard of or have been a part of.
- 4. During a meeting with Charles Lee, it became apparent that he had an alternative motive. Lee was an angry person who came to the meeting out of the interest of personal gain.



- Charles Lee began asking for \$30,000 that he was supposedly promised 5. from a previous administration. Charles Lee began trying to extort me, asking for money in exchange to destroy the audio.
- Charles Lee is a liar, he is shyster and is a hustler. Let me be absolutely 6. clear about that.
- It became abundantly clear to me that Charles Lee sought personal financial gain during a time of crisis in our city, state, and country. You have my word that no one in my administration will ever give in to a shakedown or extortion.

As a direct and proximate result, I also have suffered and have continued to suffer damages, including, but not limited to, mental anguish, emotional distress, costs and attorney's fees. Mayor Steven Reed has caused injury to me, including damage to my reputation and character, and caused unwarranted disgrace, ridicule, odium, or contempt in the estimation of my friends and acquaintances, or the public, resulting in damage to my reputation.

In accordance with the Code of Alabama, I seek damages in such an amount as the facts and law suggest in accordance with the statutory limit of \$100,000 in state law claims and an unlimited amount in any federal law claims. I also seek additional pecuniary and exemplary damages as Mayor Steven Reed has failed to correct and retract his defamatory statements and issue a public apology to me.

Before me, the undersigned Notary Public, appeared Charles Lee, who, is known March 2023. March 2023.