

November 16, 2021

VIA PRIORITY MAIL & EMAIL (Fani.WillisDA@fultoncountyga.gov)

Fani T. Willis
Fulton County District Attorney
136 Pryor Street SW, 3rd Floor
Atlanta, GA 30303

Re: Amanda Timpson

Dear District Attorney Willis:

This law firm represents Ms. Amanda Timpson with respect to the decision by the Fulton County District Attorney's Office ("FCDA") to demote her from Juvenile Diversion Programs Manager to a file clerk. For nearly three years, Ms. Timpson has been a dedicated, loyal employee who performed her exceptionally well. Despite this fact, FCDA has retaliated against her for protected whistleblowing activity when she repeatedly complained about the misuse of federal and state grant funds for the programs she was responsible for managing. The facts set forth below establish that FCDA has violated Ms. Timpson's rights under the anti-retaliation provisions of the False Claims Act ("FCA"), 31 U.S.C. § 3730(h)(1), and the Georgia Whistleblower Act of 1993 ("GWA"), O.C.G.A. § 45-1-4, *et seq.* Additionally, following her demotion, Ms. Timpson was denied the reasonable accommodation previously granted to her to work remotely two to three days per week, even though a number of other employees with the exact same job at FCDA are permitted to work remotely. This constitutes a violation of the Americans with Disabilities Act of 1990 ("ADA").

Ms. Timpson, who is originally from the Compton area of Los Angeles, is an expert on gang prevention and intervention. Prior to joining FCDA, she worked with The City of Los Angeles Mayor's Office of Gang Reduction and Youth Development ("GRYD") for seven years. Ms. Timpson has received several recommendation letters from her former supervisors, peers and community partners praising her commitment, positive energy and overall excellence in her field.

For example, Keith Lamar Jr., Ms. Timpson's former supervisor under District Attorney Paul L. Howard, Jr.'s administration, stated: "Ms. Timpson held the position of Director of Gang prevention and intervention for the Fulton county District attorney's office and excelled in this capacity. Ms. Timpson surpassed any and all expectations set forth for her in this role, her ability to thoroughly design, produce and bring much needed resources to the population we served puts her in a class of her own. Ms. Timpson consistently received superior marks across diverse categories in every evaluation." (**Exhibit 1**).

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Lieutenant David Tealer of the South Fulton Police Department stated: “Ms. Timpson’s ability to work alongside several opinions of the topic of gangs has not only led to reshaping our understanding of the impact of gangs in the communities but has also aided in helping to create a solid program that will positively impact the lives of all participants and their families. Her positive demeanor and understanding of collaborative work have allowed the develop of the program to stretch beyond the original concept to include additional partnerships and events....It has been a pleasure to work alongside Ms. Timpson, who shows her passion and commitment to positively changing the lives of the people within the communities.” **(Exhibit 2).**

Dr. Maurice Granger, Atlanta Public Schools Coordinator, Student Discipline & Title IX, stated: “Ms. Timpson diligently worked with Atlanta Public Schools Safety and Security Office, as well as The Office of Student Discipline to create, implement, and champion prevention and intervention strategies and programs targeted to our “At-Promise” (formerly known as “At-Risk”) student population and their families....It is a pleasure working with Ms. Timpson. Her work ethic, passion, resourcefulness, and ability to bring programmatic ideals to tangible fruition are some of her greatest qualities.” **(Exhibit 3.)**

Ian Elmore-Moore, a former colleague who worked under Ms. Timpson in the current administration, stated: “In my several years working alongside her she has pushed me to be my very best....Not only is she a leader she utilizes compassion, diversity, and creativity to transcend others....She is the definition of diverse as she consistently serves as an academic tutor, engaged mentor and avid advocate for our youth and young adults. Her creativity is unmatched as she goes above and beyond in all assignments allotted to her.” **(Exhibit 4.)**

On December 26, 2018, Ms. Timpson was hired as Director of Gang Prevention and Intervention in former District Attorney Howard’s administration. On December 9, 2020, after an interview with a nine-member panel, Ms. Timpson received an offer to join your administration as Juvenile Diversion Programs Manager for a four-year term, from January 2021 through December 2024. She reported directly to Chief Programs Director Michael Cuffee and was paid a salary of \$74,835.

One of Ms. Timpson’s primary responsibilities was to oversee and manage a federal grant awarded to FCDA by the U.S. Department of Justice’s (“DOJ”) Office of Juvenile Justice and Delinquency Prevention (“OJJDP”). In October 2020 (under Mr. Howard’s administration), the OJJDP awarded \$488,594 to FCDA for “Gang Prevention in Fulton County.” According to OJJDP, the funds were intended to be utilized to “work with boys and girls ages 12-17 who are at risk of joining gangs, were exposed to gang violence or victimized by criminal street gangs, or seeking assistance in removing themselves from gang activity. Most of the assisted individuals will reside in Fulton County.” See <https://www.ojjdp.ojp.gov/funding/awards/2020-mu-mu-0022>. The grant narrative, which Ms. Timpson helped to author, identifies the target population for the OJJDP project as follows:

The FCDA proposed OJJDP project will target youth ages 12-18 who have been charged through the Fulton County Juvenile Courts with *criminal street gang*

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activity or youth who have *violated gang-related student conduct policies* in Fulton County Schools (FCS) or Atlanta Public Schools (APS).

(A copy of the OJJDP grant narrative is attached as **Exhibit 5**.)

It further defines the goals, objectives, deliverables of the program as:

FCDA will plan and implement prevention, intervention, and education strategies through the AGAPE Initiative to address youth involvement in gang violence, gang victimization, and gun violence in Fulton County from October 1, 2019 - September 30, 2022.

(**Exhibit 5**.)

At the time the funds were awarded, FCDA was in the process of developing a gang prevention and youth empowerment facility at 475 Fairburn Road in Atlanta, which was intended to house all of the programs funded by the OJJDP grant, along with other gang prevention and intervention programs.

However, when Ms. Timpson joined the current administration, the gang prevention unit was abolished and the plans for the Fairburn Road facility had been halted. Accordingly, there were no programs in place for which the OJJDP funds could be utilized as directed by the grant. Ms. Timpson immediately became concerned about how FCDA was going to utilize the funds and thought the funds should possibly be returned to the federal government. Nevertheless, she continued to try to find ways to utilize the funds consistent with the grant directives. For example, she attempted to create sub-awardees, or strategic program partnerships with outside organizations that could utilize the funds for their intended purpose. However, Ms. Timpson received substantial push-back from Mr. Cuffee, who told Ms. Timpson that he wanted FCDA to utilize the OJJDP grant funds for unauthorized purposes completely unrelated to the grant directives. For example, Mr. Cuffee wanted to purchase office swag (*e.g.*, sweaters, shirts and cups), Apple Mac computers, furniture, travel, training expenses and team outings with the funds.

During staff meetings, Ms. Timpson repeatedly expressed concerns to Mr. Cuffee about the misuse of the grant funds—including on March 12, April 6, April 22, May 5 and June 3, 2021. Whenever she did so, Mr. Cuffee responded by telling her meet with him one-on-one to discuss such matters. Former Community Liaisons Krystal Lunsford and Ian Elmore-Moore witnessed Ms. Timpson repeatedly raising these concerns during staff meetings. (*See* statements of K. Lunsford & I. Elmore-Moore, attached as **Exhibit 6**.) When Ms. Timpson did meet with Mr. Cuffee individually to discuss her concerns, he did not seem to care and continued to push for the unauthorized use of the federal grant money.

On May 3, 2021, Ms. Timpson emailed you requesting to schedule a meeting to discuss her concerns about the misuse of the OJJDP grant funds, but you ignored her request. (A copy of Ms.

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Timpson's 5/3/21 email to you is attached as **Exhibit 7**.) Ms. Timpson had also previously attempted to meet with you on April 8, April 15, and in mid-March 2021, yet those requests were also ignored. On July 21, 2021, Ms. Timpson repeated her concerns about the misuse of grant funds to Chief of Staff for Personnel, Kyra Banks. On July 26, 2021, she also expressed the same concerns to Deputy District Attorney for Operations, Dexter Bond.

Ms. Timpson's complaints to Mr. Cuffee and other management representatives concerning the misuse of the OJJDP grant funds constituted legally-protected whistleblowing activity under the FCA, as she was reporting a good-faith belief that, by refusing to return the OJJDP grant award funds and/or expending those funds for unauthorized purposes, FCDA was "knowingly present[ing]...a false or fraudulent claim for payment or approval." *See* 31 U.S.C. § 3729, *et seq.*

On or about May 4, 2021, Ms. Timpson was also assigned responsibility for planning and coordinating the Junior District Attorney ("Junior DA") program, which is funded in part by a federal grant through the Edward Byrne Memorial Justice Assistance Grant ("JAG") Program administered by the DOJ's Bureau of Justice Assistance ("BJA"). Upon information and belief, the Junior DA program is also partially funded by a grant award from the State of Georgia. The Junior DA is a four-week educational and crime-prevention summer program designed to provide rising 6th-9th grade students with an overview of the criminal justice system. FCDA's published materials state that the Junior DA program "accepts 6th to 9th graders from Atlanta and Fulton County public schools." (**Exhibit 8**).

Notwithstanding this requirement, in mid-July 2021, during the first week of the program, Ms. Timpson observed the "ice breaker" sessions and learned that many of the youth participants attended schools outside of Atlanta and Fulton County public schools—for example, in Clayton, DeKalb, and Gwinnett Counties, along with some who even attended schools outside of Georgia, such as in Florida and Wisconsin. She further learned that many of the youth participants in the Junior DA program were selected because they were friends or relatives of public officials, even though they were not members of the population the program was intended to serve.

In mid to late-May 2021, Ms. Timpson began asking Mr. Cuffee probing questions about the budget, participants, liability, and how FCDA was going to go about selecting participants for the Junior DA program given COVID-19 and the fact that she was assigned responsibility for the program so late in the school year. Mr. Cuffee appeared upset and frustrated with Ms. Timpson's questions. On or about May 25, 2021, instead of addressing Ms. Timpson's concerns, Mr. Cuffee retaliated by removing her from responsibility for the Junior DA program. Instead, he assigned such responsibility to Krystal Lunsford and Community Liaison Deonte Pollard.

On June 30, 2021, Mr. Cuffee again retaliated against Ms. Timpson by attempting to place her on an unjustified and unapproved Performance Development Plan ("PDP"). Prior to this, Mr. Cuffee had never counseled, warned or disciplined Ms. Timpson for any performance-related issue. The PDP was plainly an act of retaliation by Mr. Cuffee based on Ms. Timpson's protected whistleblowing activity. In the PDP, Mr. Cuffee criticized Ms. Timpson for allegedly not following

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her “chain of command,” which is a thinly-veiled attempt to re-characterize her protected whistleblowing as some type of policy violation. He also had the audacity to criticize her appearance, including her “facial piercings” (she wears nose rings that are culturally relevant to her Ghanaian heritage) and “visible tattoos” (she has tribal tattoos), which he suggested were “gang-related” because she is from Compton.

Although the PDP was written on Dexter Bond’s letterhead, when Ms. Timpson contacted Mr. Bond (on July 26, 2021) and sent him a screenshot of the first page of the document, he indicated that he had never seen nor authorized it. He responded, “Wow. Make me a physical copy. This is a problem.” (A copy of Ms. Timpson’s 7/26/21 text message exchange with Mr. Bond, along with the remaining pages of the PDP, is attached as **Exhibit 9**.)

In mid-July 2021, after she discovered that many of the Junior DA youth participants had not been selected according to the program criteria, Ms. Timpson expressed her concerns to Mr. Cuffee, Ms. Lunsford and Mr. Pollard. On July 8, 2021, Ms. Timpson also contacted Kyra Banks and eventually a meeting was scheduled on or about July 21, 2021, during which Ms. Timpson discussed, among other things, her concerns about the selection of the Junior DA program participants. Ms. Timpson’s complaints to management about the selection of the Junior DA program participants also constituted protected whistleblowing activity under the FCA and the GWA.

On July 23, 2021, Krystal Lunsford told Ms. Timpson that Mr. Cuffee hold told her and others in the office, “I’m going to fire that bitch (referring to me)” and that he was planning to use her PDP as grounds to terminate her by August 4, 2021, and he had already requisitioned a temporary employee to replace her.

On July 26, 2021, Ms. Timpson met with Dexter Bond and shared her concerns about the retaliatory PDP and her belief that Mr. Cuffee had violated the directives of the Junior DA grant and was attempting to misuse the OJJDP grant funds for unauthorized purposes. Mr. Bond reiterated that he was previously unaware of the existence of the PDP, he did not authorize it, and Mr. Cuffee did not follow FCDA policy by issuing it. Ms. Timpson also told Mr. Bond that she felt she had grounds to initiate a lawsuit against FCDA due to Mr. Cuffee’s retaliation and attempted wrongful termination of her employment. Shortly after mentioning a potential lawsuit, Ms. Timpson was informed that she had a meeting scheduled with you at 3pm that day. Despite months of failed attempts to secure a meeting with you to discuss her serious concerns about Mr. Cuffee’s misuse of grant funds and other matters, the moment Ms. Timpson mentioned a “lawsuit,” she instantly was instantly able to meet with you.

During Ms. Timpson’s meeting with you, you immediately stated, “I hear you and your supervisor are like oil and water.” You proceeded to tell her that the PDP Mr. Cuffee attempted to initiate was null and void as he had not followed FCDA policy. You continued to state that you were disappointed in Ms. Timpson’s performance—a claim that she had never heard from you previously—and that, effective immediately, you were demoting her to a file clerk position and

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requiring her to work in the office Monday through Friday from 8:30am to 5:00pm. The entire meeting lasted approximately three minutes and you never gave Ms. Timpson an opportunity to respond or to communicate her concerns about Mr. Cuffee or the misuse of the grant awards.

In follow-up emails exchange between Ms. Timpson and you between July 26 and August 2, 2021, you clarified that while you were not reducing Ms. Timpson's salary as a result of the demotion, you were eliminating her previously-granted ADA reasonable accommodation of working remotely two to three days per week, due to her severe asthma, the presence of mold in the building, and the health risks to Ms. Timpson associated with COVID-19. You stated that Ms. Timpson's new file clerk position could not be performed remotely, despite the fact that a number of other similarly-situated file clerks (including Bryant Brinson, Chrissandra Jallah, Kella LoveJoy, Saquez King, and Ebony Davisto) continued to work remotely through October 2021. You stated, "If you are unable to do your job for health reasons please take care of your health and go out on FMLA. Otherwise beginning 8/23/2021 you will need to report as instructed." (**Exhibit 10**). Your decision to deny Ms. Timpson the same opportunity to work remotely as other file clerks in the office constitutes a violation of the ADA and is a further act of retaliation against her.

On July 26, 2021, Ms. Timpson submitted an Intake Questionnaire to the Equal Employment Opportunity Commission ("EEOC") to initiate a Charge of Discrimination against FCDA for race, gender and national origin-based discrimination.

On July 27, 2021, Ms. Timpson met with Fulton County Human Resources ("HR") representatives Lawanda Neely and Justina Gordon and provided a detailed account of her complaints concerning Mr. Cuffee's mistreatment of her culminating with the retaliatory demotion. The County HR investigation is ongoing and, on September 20, 2021, Ms. Timpson was interviewed by senior HR manager Michelle Braxton, who escalated the matter to the County attorney.

On August 2, 2021, Ms. Timpson suggested to you that, as a reasonable accommodation for her disabilities, she could work remotely from home doing e-filing. However, moments later, Tashekka Fleming sent Ms. Timpson an email notifying her that her FCDA laptop was being taken allegedly due to "lack of laptop inventory." Ms. Timpson suspected that you directed Ms. Fleming to take back her laptop as a further act of retaliation to ensuring that her disabilities would not be reasonably accommodated. After Ms. Timpson sent Ms. Fleming a text message with a "side eye" emoji, Ms. Fleming confirmed her suspicions, stating: "My bad I meant to call you DA Willis told me to send you that." (Copies of Ms. Fleming's 8/2/21 email and the text message exchange between Ms. Fleming and Ms. Timpson are attached as **Exhibit 11**).

On August 3, 2021, Ms. Timpson submitted an amended Intake Questionnaire to the EEOC adding a claim against FCDA for denial of reasonable accommodations under the ADA. (A copy of her 8/3/21 Intake Questionnaire is attached as **Exhibit 12**.)

Your decision to demote Ms. Timpson, a highly experienced and qualified subject matter expert in her field, to a file clerk, is tantamount to a constructive discharge. Although you did not reduce

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her compensation, the demotion has already caused serious harm to Ms. Timpson's career. If she were to remain in this role for any significant time period, the damage would be irreparable, as prospective employers would have serious misgivings about why someone with Ms. Timpson's experience and skillset would have been demoted to an entry-level administrative position. As a result of the mental anguish and stress your actions have caused her, Ms. Timpson been diagnosed with anxiety disorder and has begun seeing a professional counselor bi-weekly—something she has never previously needed to do in her life. (A copy of a letter from Ms. Timpson's counselor is attached as **Exhibit 13**.)

Ms. Timpson is fully prepared to commence legal action against FCDA for violating the anti-retaliation provisions of the FCA and GWA, and for the denial of a reasonable accommodation under the ADA. She will seek damages for, among other things, back pay, front pay, compensatory damages, punitive damages, attorneys' fees and costs. We believe that both judge and jury will look favorably upon her claims. Moreover, if a lawsuit is filed, FCDA's unlawful practices—including the misuse of OJJDP grant funds and the favored selection of public officials' children and friends for the Junior DA program—will become a matter of public record, which will undoubtedly cause embarrassment for the County and your administration.

Notwithstanding the strength of her claims, in an effort to resolve this matter without the necessity of time-consuming, expensive and otherwise disruptive EEOC investigation and lawsuit, Ms. Timpson is presently willing to settle on the following terms:

FCDA would agree to a mutually agreeable separation of Ms. Timpson's employment on the following terms:

1. Pay to Ms. Timpson a lump sum equal to twelve month's salary (*i.e.*, \$74,835);
2. For the same twelve-month period, pay the required COBRA insurance premiums to enable Ms. Timpson to continue the same coverage he previously had under the County's employee benefit plans;
3. Pay to Ms. Timpson an additional lump sum of \$25,000 representing damages for the embarrassment, mental anguish and emotional distress that she suffered;
4. Pay Ms. Timpson's actual attorneys' fees and costs, which are at this point estimated to be \$5,000;¹
5. Provide Ms. Timpson with a mutually agreeable positive letter of recommendation;
6. Limit the information FCDA provides in response to reference requests from prospective employers to confirmation of Ms. Timpson's dates of employment and positions held; and
7. Mutual non-disparagement.

¹ Attorneys' fees and costs will continue to increase should this matter remain unresolved. Ms. Timpson will seek recovery of all of her attorneys' fees and costs if litigation is required.

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Ms. Timpson would agree to:

1. Voluntarily resign her employment with FCDA;
2. Withdraw her EEOC inquiry;
3. Refrain from filing any EEOC charge or lawsuit against FCDA;
4. Provide FCDA with a full and final release of all claims associated with her employment, except for enforcement of the settlement agreement;
5. Keep the terms of settlement completely confidential; and
6. Mutual non-disparagement.

Please let me know whether FCDA will act to resolve this matter on the above terms by Monday, November 29, 2021 at 5:00 p.m., at which time this offer will be withdrawn, and Ms. Timpson will proceed to pursue all available legal remedies.

Thank you in advance for your prompt consideration of this matter.

Sincerely,



Gregory R. Fidlon

Enclosures

Willis, Fani

From: Willis, Fani
Sent: Tuesday, November 16, 2021 8:56 PM
To: Bond, Dexter; Geary, Don
Subject: RE: Amanda Timpson

Mr. Geary please speak to Mr. Bond about this matter. He wants you two to get on a conference call with our county attorney.

So much of the letter is inaccurate.

From: Willis, Fani
Sent: Tuesday, November 16, 2021 7:14 PM
To: Bond, Dexter ; Geary, Don
Subject: FW: Amanda Timpson

We are absolutely not settling this claim.

Fani T. Willis

Fani T. Willis
District Attorney
Atlanta Judicial Circuit
Fulton County, Georgia

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From: Greg Fidlon [<mailto:greg@fidlonlegal.com>]
Sent: Tuesday, November 16, 2021 2:37 PM
To: Willis, Fani <Fani.WillisDA@fultoncountyga.gov>
Subject: Amanda Timpson

DA Willis,

Please see the attached.

Best Regards,

Gregory R. Fidlon, Esq.
FIDLON LEGAL, PC
3355 Lenox Road, Suite 750



FW: Amanda Timpson

From Greg Fidlon <greg@fidlonlegal.com>

Date Wed 12/1/2021 11:12 AM

To Don.Geary@fultoncountyga.gov <Don.Geary@fultoncountyga.gov>; Dominique.Martinez@fultoncountyga.gov <Dominique.Martinez@fultoncountyga.gov>

Cc Fani.WillisDA@fultoncountyga.gov <Fani.WillisDA@fultoncountyga.gov>; Niger.Thomas@fultoncountyga.gov <Niger.Thomas@fultoncountyga.gov>

 1 attachment (4 MB)

Willis, Fani-ltrto-2021-11-16 re offer of compromise FINAL (with exhibits).pdf;

Mr. Geary and Ms. Martinez,

I am writing to follow up on my 11/16/2021 demand letter to DA Willis (attached), which requested a response by 11/29/2021. I understand that you may be representing the DA's office in connection with this matter. Please confirm.

I have yet to hear back from DA Willis or anyone representing the DA's office in connection with this matter, despite my follow-up email yesterday (below).

Please let me know when I can expect a response.

Best Regards,

Gregory R. Fidlon, Esq.

FIDLON LEGAL, PC

3355 Lenox Road, Suite 750

Atlanta, GA 30326

T: 844-LAW-4-WORK (844-529-4967)

F: 844-LAW-4-FAX (844-529-4329)

E: greg@fidlonlegal.com

W: fidlonlegal.com

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From: Greg Fidlon

Sent: Tuesday, November 30, 2021 6:42 PM

To: Fani.WillisDA@fultoncountyga.gov

Subject: RE: Amanda Timpson

DA Willis,

I am following up on my 11/16/21 letter (copy attached) which requested a response by yesterday, 11/29.

I have not heard from you or anyone else representing the DA's office. Please let me know if your office is planning to respond, if so, when I can expect to receive it.

Best Regards,

Gregory R. Fidlon, Esq.

FIDLON LEGAL, PC

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Atlanta, GA 30326

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From: Greg Fidlon

Sent: Tuesday, November 16, 2021 2:37 PM

To: Fani.WillisDA@fultoncountyga.gov

Subject: Amanda Timpson

DA Willis,

Please see the attached.

Best Regards,

Gregory R. Fidlon, Esq.

FIDLON LEGAL, PC

3355 Lenox Road, Suite 750

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