

April 14, 2023

## **MEMORANDUM**

TO:

Kemberle Braden

Chief of Police

FROM:

Timothy Rugg

Sergeant

**SUBJECT:** 

Estate of Jada Johnson, L.J., the minor daughter of Jada Johnson, Richard

Iwanski, individually, as executor of the Estate of Jada Johnson and guardian of L.J., and Maria Iwanski, individually, as executor of the Estate of Jada Johnson and guardian of L.J. v. City of Fayetteville, Sergeant Timothy Rugg individually, Officer Zacharius Borom, individually, John and Jane Doe's 1-100, City of

Fayetteville Employees and Police Officers

Civil Action No.: 5:23-cv-00180

I, Timothy Rugg, have been named as a Defendant in the above-referenced lawsuit that was filed in the United States District Court for the Eastern District of North Carolina on or about April 7, 2023. It is my understanding that the suit has been brought against me for actions taken while I was performing my official duties as a Sergeant for the City of Fayetteville Police Department. Therefore, I respectfully request that the City of Fayetteville provide legal representation to defend the alleged claims.

TR/sms