



April 12, 2023

**MEMORANDUM**

**TO:** Kemberle Braden  
Chief of Police

**FROM:** Zacharius Borom *Zacharius Borom*  
Police Officer

**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, Zacharius Borom, 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 an Officer for the City of Fayetteville Police Department. Therefore, I respectfully request that the City of Fayetteville provide legal representation to defend the alleged claims.

ZB/sms

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