***Spoliation Notice to Property Management or Owner in Suspected Negligent Security Case***

January 1, 2019

**VIA CERTIFIED MAIL**

Property Management, Inc.

Attn: Manager

9999 Old Town Road, Suite 100

Big City, Georgia 30010

**Re: Our Client: James Smith**

**Date of Incident: December 31, 2018**

**Location: Big City Apartments**

 **1111 Metro Avenue**

 **Big City, Georgia 30010**

Dear Representative:

This firm represents the family and heirs of James Smith, who was a tenant and resident of Big City Apartments.  He was shot and killed at the complex on or about December 31, 2018.  We have been asked to investigate the incident, including potential civil negligent security claims.  Please place your insurance carrier(s) on notice of this incident, if you have not already done so.  This also gives you further, and formal, notice of contemplated litigation.  Accordingly, please preserve all relevant evidence of any kind.  Without limitation, that would include:

1. Employee files;

2. Tenant files;

3. Crime notice letters;

4. Any documents reflecting knowledge, notice, or investigation into criminal activity on or around the premises;

5. Any emails pertaining to security, criminal activity, deterrence, resident complaints/concerns, James Smith, or the subject incident;

6. Any evidence reflecting or relating to communications with law enforcement regarding the premises, crime, criminal activity or security; or

7. Any other relevant evidence, including videos, notes, emails or other documentary, physical or electronic evidence pertaining in any way to this incident, crime or safety/security of the premises.

8. Any posts about the incident on any social media platform including but not limited to Facebook, Instagram, Twitter, LinkedIn, or any other digital public platform.

 Failure to preserve relevant evidence may lead to sanctions for spoliation.

We would welcome the opportunity to discuss the matter with you or your attorney, and would certainly appreciate any materials you have in this regard.  Please feel free to call us at your earliest convenience, and please accept this as a request for all insurance information, including primary and excess policies, pursuant O.C.G.A § 33-3-28.

                                                                                    Sincerely,

                                                                                    Attorney at Law