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June 5, 2003

Mayor Charles Womack
 45 E Broad St
 PO Box 998
 Cookeville, TN 38503-0998



Re: *Eric Hall v. City of Cookeville*

Dear Mayor Womack:

Please be advised that I represent Officer Eric Hall in reference to a potential lawsuit against the City of Cookeville. The City released Officer Hall's personnel file and personal information without his knowledge; therefore, the City violated T.C.A. § 10-7-503, which requires that Officer Hall receive notice within three (3) days from the date of the release.

Also, the City failed to "black out" all of the social security and driver's license numbers of Officer Hall and the name and date of birth of one child. Pursuant to 42 U.S.C. § 1983, the City is liable for damages because the release of the information created a "special danger" to Officer Hall and thereby deprived him of his civil rights.

The City released the information to Geoffrey Davidian from The Putnam Pit who placed Officer Hall's entire personnel file and personal information on a website. The Putnam Pit is well known by the City as a radical group that has basically taken upon itself to attack all aspects of the City. The dog shooting incident, involving Officer Hall, which occurred in January 2003, created media frenzy and was repeatedly shown on national television. Since the City was familiar with Geoffrey Davidian and The Putnam Pit, the City was fully aware that this type of group should not have been given Officer Hall's personal information without notice to him.

About 30 days after the information was released, Officer Hall was informed by another officer that all of his personnel file had been placed on the internet at *putnampit.com*. Officer Hall then approached the Chief, regarding the release of information, and the Chief informed him that he had boxes of letters, including death threats, but would not give him all of the letters because the letters were not worth reviewing. One particular letter discussed raping and killing Officer Hall's children and burying them like a dog in the backyard. The City never took action on behalf of Officer Hall regarding the death threats.

Officer Hall contacted the FBI, regarding the numerous death threats against him. The FBI through their investigation discovered that a contract had been placed on Officer Hall's life for approximately \$100,000 and there were apparently piles of other death threats against Officer Hall received by the City.

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The City again stonewalled and would not cooperate with the FBI. The City simply used a callous approach and brushed the situation aside hoping it would go away. Officer Hall will not let the situation go away and intends to file a lawsuit for violation of a state statute, violation of civil rights, damages and mental suffering occurred by Officer Hall and his family.

Officer Hall and his family do not feel safe in their home. Several people have come around Officer Hall's home, knocking on the windows, and absolutely frightening his wife and children to the point of hysteria. His children are not allowed to play outside without constant supervision in the fear that something might happen to them. Officer Hall's wife is suffering from post-traumatic stress syndrome, and his entire family has consulted the professional help of a psychiatrist due to the death threats.

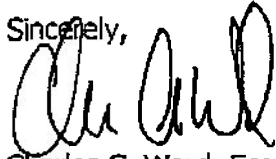
In reviewing 1998 WL 931489 (Tenn.A.G.), the City has clearly violated Officer Hall's federal due process rights. I assure you that, if a lawsuit is filed, the demand will be for several million dollars. Officer Hall is willing to settle this matter for a more reasonable amount if the City is willing to negotiate in good faith.

If I do not receive a response from the City within 30 days, I will proceed with filing a lawsuit. Officer Hall requested that I pass along a verse from the Bible (NIV), Luke 12:57-58,

Why don't you judge for yourselves what is right? As you are going with your adversary to the magistrate, try hard to be reconciled to him on the way, or he may drag you off to the judge, and the judge turn you over to the officer, and the officer throw you in prison.

As always, I look forward to hearing from you.

Sincerely,



Charles G. Ward, Esq.

CGW/cp

cc: Councilman Sam Sallee
136 S Walnut Ave
Cookeville, TN 38507

Officer Eric Hall

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