

Exhibit A
Ante Litem Notices
(Stamped Hand-Delivery Copies)

VIA CERTIFIED MAIL

May 12, 2026

Jacqueline A. Niles, City Clerk
City Clerk's Office
Prichard City Hall
2106 E. Prichard Ave.
Prichard, AL 36610

RECEIVED MAY 15 2026



**RE: CLAIMANT TERRY SIAFA BAILEY'S ANTE LITEM NOTICE OF CLAIM
PURSUANT TO ALA. CODE § 11-47-23 AND § 11-47-192**

Claimant: Terry Siafa Bailey
Date of Incident: November 15, 2025
Prichard Police Department Case Number: 251100110 / S25-11-0253
Mobile County District Court Case Numbers: DC-2025-909058.00,
DC-2025-909059.00, DC-2025-909060.00, DC-2025-909061.00, DC-2025-909062.00

To the City Clerk of the City of Prichard, Alabama:

Pursuant to Alabama Code § 11-47-23 and § 11-47-192, I, Terry Siafa Bailey, hereby provide this sworn ante litem notice of my claims against the City of Prichard, Alabama, the Prichard Police Department, and their officers, employees, and agents, arising from my unlawful arrest on November 15, 2025. The facts stated herein are true and correct to the best of my knowledge and belief.

CLAIMANT INFORMATION

My name is Terry Siafa Bailey; my address is 5510 Rockton Wood Way, Atlanta, Georgia 30331; my phone number is (404) 694-3553; and my email is terrysbailey@gmail.com.

I am a licensed attorney in Atlanta, Georgia. I have no criminal history whatsoever.

DATE, TIME, AND PLACE OF INCIDENT

This incident occurred on November 15, 2025, beginning at approximately 5:38 PM, at or near 312 S. Wilson Avenue, Prichard, Alabama 36610, in front of Lotus Gentlemen's Club.

MANNER IN WHICH THE INJURY WAS RECEIVED

On November 15, 2025, I was the victim of a premeditated conspiracy in which private actors lured me to Prichard, Alabama under the pretense of a legitimate business meeting, planted controlled substances in my rental vehicle without my knowledge, and coordinated with officers of the Prichard Police Department to conduct an unlawful traffic stop of my legally parked vehicle, execute an unlawful search of that vehicle, and effectuate my wrongful arrest based on

planted evidence. As the result of the illegal actions of the City of Prichard Police Department, I was wrongfully charged with felony drug trafficking offenses that carry a mandatory sentence of life imprisonment. These charges were dismissed in their entirety within eighteen days of my arrest, which directly substantiates the baseless and false nature of the charges. I suffered significant damages as the result of the City of Prichard's illegal conduct, as outlined herein.

A. Background and Luring Operation

In October 2025, I was contacted by an individual known to me as "JP," whose real name I later learned was Anton Harris. Mr. Harris represented that he had a legitimate business opportunity in Alabama requiring legal consultation. The business opportunity involved the purchase of a club. As an attorney, I have assisted other clients with these types of transactions in the past, so I assumed that Mr. Harris was seeking my professional expertise. Following a paid in-person consultation in Tucker, Georgia on approximately October 17, 2025, I agreed to travel to Alabama to review potential commercial locations for Mr. Harris. I was paid a consultation fee and had no reason to suspect any unlawful purpose.

On the morning of November 15, 2025, I traveled from Atlanta, Georgia to Prichard, Alabama in a 2025 Jeep Grand Wagoneer rental vehicle, accompanied by my driver, Brandon Parker Tatum. My plan was to meet Mr. Anton Harris in Prichard to discuss the business opportunity. Before I left Atlanta, Mr. Harris called me and requested that I give a ride to his acquaintance, an individual known to me only as "Trey," whose real name I later learned was Laparis(h) Lewis. I agreed to that request, and Mr. Lewis entered the vehicle in Atlanta, Georgia. During a gas station stop in Fort Deposit, Alabama, Mr. Lewis feigned losing his wallet, causing a distraction. It is my belief that it was during this stop that Lewis planted a bag containing controlled substances behind my seat of the rental vehicle without my knowledge or consent.

After I arrived in Prichard, Lewis was dropped off at a residence near the Lotus Gentlemen's Club. We then parked the rental vehicle legally on S. Wilson Avenue in front of Lotus Gentlemen's Club and waited for Anton Harris and his business partners to arrive for the purported business meeting. There was never a legitimate business meeting. I have since confirmed that the entire arrangement was a set up designed to obtain my false arrest by the City of Prichard Police Department.

B. Stop and Search

While legally parked at or near 312 S. Wilson Avenue, no less than three police cars from the City of Prichard Police Department simultaneously activated their emergency lights and surrounded my vehicle. There was no lawful basis for this coordinated stop whatsoever. The vehicle was legally parked and neither Mr. Tatum (my driver) nor I had engaged in *any* unlawful conduct. This stop violated my legal rights under federal law and Alabama law.

According to the police report, Officer Terrance J. Palmore (Officer ID No. 20384) was the first to approach my vehicle and requested identification. Officer Palmore asked whether there was anything illegal in the vehicle. Mr. Tatum and I both stated there was not. Officer Palmore requested consent to search the vehicle. Mr. Tatum declined. Officer Palmore then addressed me

directly and requested my consent. I declined as well. I asked Officer Palmore whether we were being detained. He confirmed that we were.

When I asked for the basis of the detention, Officer Palmore falsely claimed to detect the odor of marijuana emanating from the vehicle. This claim was false and without factual basis. There was no marijuana in the vehicle. The vehicle was a brand-new rental car that had been cleaned prior to my taking possession of it that morning. There were no other individuals in the immediate vicinity on our side of the street — the entire block in front of the vehicle was unoccupied. The claim that marijuana odor was coming from a nearby source is not credible and lacks evidentiary support.

Officer Palmore then stated that if we did not consent to a search, he would arrange for a K-9 unit to respond. We declined consent and indicated we were prepared to wait for the K-9 unit. Despite this, and despite the absence of a warrant, consent, or arrival of any K-9 unit, Officer Palmore and other Prichard officers instructed us to exit the vehicle and proceeded to conduct a warrantless search. This search violated my legal rights under federal law and Alabama law.

According to the police report, the search was conducted by Officer Palmore, Officer R. Jones, Officer Robison, and Investigator Ryan Spencer Phillips. No marijuana was found — directly corroborating my representation that there was none. During the search of the vehicle, officers searched a bookbag and found a sandwich-style Ziploc bag containing controlled substances. I did not place any controlled substances in that bag or in the vehicle. These substances were planted in my vehicle by other individuals, likely including Laparish Lewis. The fabrication of evidence violated my rights under federal law and Alabama law.

Further, my arrest on November 15, 2025 was a coordinated event that necessarily required the agreement and coordination of multiple individuals, including those who work at the Prichard Police Department. To be sure, my arrest was not a random isolated incident but rather part of a coordinated plan to arrest me for crimes that I did not commit. Officers from the Prichard Police Department played an indispensable role in that conspiracy. That conspiracy violated my rights under federal law and Alabama law.

C. Dismissal of All Charges

On December 3, 2025, the State of Alabama completely and summarily dismissed all five fabricated charges pending against me. The motion to dismiss was granted the day it was filed by District Judge Deborah D. Tillman. All charges were dismissed eighteen days after my arrest. The speed of this dismissal, and the absence of any further investigation, confirms that the charges had absolutely no legitimate basis.

D. Investigator Ryan Spencer Phillips — Federal Indictment for Evidence Tampering

As mentioned, Investigator Ryan Spencer Phillips was one of the officers who conducted the unlawful search of my vehicle and, according to the police report, took custody of and secured in his patrol vehicle the bookbag in which the planted narcotics were found. I vividly remember that Investigator Phillips played an active role in the search of my vehicle, my detention, and my

arrest. *Investigator Ryan Spencer Phillips has since been federally indicted in the United States District Court for the Southern District of Alabama (Case No. 1:26-cr-00059-JB-N) on charges of Possession of a Stolen Firearm in violation of 18 U.S.C. § 922(j), filed March 25, 2026.* According to the indictment and public media reports, Phillips stole firearms from a crime/accident scene he was investigating while on duty as a police officer for the Prichard Police Department. Phillips is currently in jail without bond pending trial in federal court.¹ Officer Phillips' theft and manipulation of crime scene evidence occurred mere months after his involvement in my illegal and coordinated traffic stop involving planted evidence.

Additionally, Phillips is under active investigation in connection with the fatal shooting of his roommate, San Juania Coronado, at his personal residence in February 2026. According to public reports, the Mobile County District Attorney's Office is leading that investigation.

An officer who steals and manipulates physical evidence from scenes he investigates in his official capacity — as a federal grand jury has now found probable cause to charge — is an officer capable of manipulating evidence at any scene. Phillips' recent alleged criminal conduct is directly relevant to my claim disclosed herein that he and others participated in concerted conduct that violated my legal rights. Phillips' recent alleged criminal conduct is also directly relevant to the City's obligation to supervise and discipline its officers, and to the City's liability for retaining an officer whose propensity for egregious evidence tampering was or should have been known.

E. Other Incidents at the Prichard Police Department

My claim against the City of Prichard and the Prichard Police Department arises in the context of other public incidents, showing a continued failure to train, supervise, and discipline officers for misconduct. As a few examples, in April 2021, an officer was arrested for computer tampering and ethics violations after he illegally used a law enforcement database to get information on people;² in August 2025, an officer kept an arrestee's phone, went through it, and sent compromising photos to the arrestee's wife;³ in September 2024, a detective was charged with perjury after he told several material falsehoods to the Mobile County District Attorney's Office, which were related to the dismissal of a murder investigation;⁴ and now, most recently, in November 2025 and March 2026, my own case and the indictment of Investigator Phillips demonstrate that the City's failure to train, supervise, and discipline its officers continues to cause significant harm. In fact, after Investigator Phillips was indicted for tampering with evidence, the Mobile County Sheriff's Office announced that it was partnering with the City of

¹ <https://www.fox10tv.com/2026/04/01/prichard-police-officer-under-investigation-fatal-shooting-pleads-not-guilty-federal-gun-charge/>;

<https://mynbc15.com/news/local/prichard-officer-accused-of-taking-gun-from-crash-scene-while-on-duty-federal-affidavit-s>; <https://www.al.com/crime/2026/03/alabama-police-officer-investigated-in-womans-shooting-death-arrested-for-stolen-guns.html>

² <https://www.wkrg.com/top-stories/prichard-police-officer-arrested-and-charged-with-computer-tampering-ethics-violations/>

³ <https://www.wkrg.com/mobile-county/prichard-police-officer-accused-of-withholding-evidence-sending-explicit-images-mcso/>

⁴ <https://www.fox10tv.com/2024/09/04/prichard-police-detective-arrested-charged-with-perjury/>

Prichard to attempt to improve the deficiencies in its officer training program and overhaul Prichard Police Department's evidence room.⁵

SUMMARY OF CLAIMS

This notice gives rise to claims against the City of Prichard, the Prichard Police Department, and their officers, agents, and employees, including but not limited to the following:

- Unlawful stop and detention in violation of the Fourth Amendment to the United States Constitution (42 U.S.C. § 1983)
- Unlawful warrantless search in violation of the Fourth Amendment (42 U.S.C. § 1983)
- Fabrication of evidence and fabrication of false probable cause in violation of the Fourth and Fourteenth Amendments (42 U.S.C. § 1983)
- Civil rights conspiracy between officers and private actors (42 U.S.C. §§ 1983, 1985)
- Municipal liability for violations of 42 U.S.C. § 1983 under *Monell v. Department of Soc. Svcs.*, 436 U.S. 658 (1978), *City of Canton, Ohio v. Harris*, 489 U.S. 378 (1989), and their progeny
- False arrest and false imprisonment under Alabama law
- Malicious prosecution under Alabama law
- Civil conspiracy under Alabama law
- Abuse of process under Alabama law
- Intentional infliction of emotional distress under Alabama law
- Negligent hiring, supervision, and retention of Officer Palmore, Investigator Phillips, and other involved officers
- All other claims available at law and in equity

This recitation of claims is not exhaustive, and all rights are expressly reserved.

DAMAGES

As a direct and proximate result of the foregoing conduct, I have suffered damages including but not limited to:

- Loss of liberty and wrongful incarceration
- Attorney's fees, legal expenses, and court costs incurred in defense of false criminal charges
- Lost income and lost professional opportunities as a practicing attorney
- Severe and ongoing emotional distress, mental anguish, and psychological harm
- Reputational harm
- Harm to my professional standing and law practice
- Harm to my family relationships and personal life
- Attorneys' fees pursuant to 42 U.S.C. § 1988

⁵ <https://www.fox10tv.com/2026/03/16/prichard-works-with-mcso-improve-administrative-processes/>

The damages currently exceed **\$1,000,000** by a significant amount, and the full extent of damages continues to be evaluated. All rights to seek additional damages, including punitive damages, are expressly reserved.

PRESERVATION OF EVIDENCE

The City of Prichard, the Prichard Police Department, and all officers, employees, and agents are hereby placed on notice to immediately preserve all evidence related to this incident and to the officers involved, including but not limited to:

- All body-worn camera footage from all officers present on November 15, 2025
- All dash camera footage
- All dispatch logs, CAD records, and radio communications for November 15, 2025
- The complete incident report (Agency Case No. 251100110), all drafts, and all supplements, and all related reports
- All internal communications regarding the stop, search, arrest, or investigation of Terry Bailey and/or Brandon Tatum
- All records relating to any tip, call, or communication that preceded the stop
- All records relating to Officer Palmore, Investigator Phillips, Officer R. Jones, and Officer Robison, including personnel files, disciplinary records, internal affairs complaints, and prior misconduct investigations
- All records relating to Emmanuel Dotch, including personnel files, disciplinary records, and any investigation into his conduct
- All records relating to the Prichard Police Department ethics investigation referenced in public reporting
- All records relating to the Mobile County Sheriff's Office's effort to overhaul the City of Prichard evidence room and training program
- All records relating to Investigator Phillips' involvement in other evidence handling, drug cases, or property seizures during his tenure with Prichard PD
- All communications between any Prichard PD officer and any private individual regarding Terry Bailey, Brandon Tatum, or the November 15, 2025 stop
- Surveillance footage from the area of 312 S. Wilson Avenue for the period November 14–15, 2025
- All booking records, bond records, and charging documents related to this matter

Failure to preserve this evidence may result in additional claims, sanctions, and adverse inference instructions in any subsequent litigation.

I intend to pursue all available legal remedies arising from this incident, including litigation in both state and federal court. This notice is not intended as a complete statement of all facts, claims, witnesses, or damages, and all rights are expressly reserved.

Signatures on Following Page

SWORN STATEMENT OF TERRY SIAFA BAILEY

I, Terry Siafa Bailey, being first duly sworn, state under oath that I have read the foregoing Ante Litem Notice and that the facts stated herein are true and correct to the best of my knowledge, information, and belief.


Terry Siafa Bailey
5510 Rockton Wood Way
Atlanta, Georgia 30331

5/12/26
Dated

This notice is submitted pursuant to Ala. Code §§ 11-47-23 and 11-47-192.

Sworn to and subscribed before me this 12 day of May, 2026.

 [Seal]



Notary Public State of Georgia

My Commission Expires: 12-3-29

2026 MAY 15 9:25AM

VIA CERTIFIED MAIL

May 13, 2026

County Administrator
Mobile County Commission
205 Government Street
Mobile, AL 36602

(Eddie Kerr)

8th Floor.

Sheriff Paul Burch
Mobile County Sheriff's Office
510 South Royal Street
Mobile, AL 36603

**RE: CLAIMANT TERRY SIAFA BAILEY'S ANTE LITEM NOTICE OF CLAIM
PURSUANT TO ALA. CODE §§ 11-47-23, 11-47-192, 11-12-8**

Claimant: Terry Siafa Bailey
Date of Incident: November 15, 2025
Prichard Police Department Case Number: 251100110 / S25-11-0253
Mobile County District Court Case Numbers: DC-2025-909058.00,
DC-2025-909059.00, DC-2025-909060.00, DC-2025-909061.00, DC-2025-909062.00

To the County Administrator of Mobile County Commission and to Sheriff Paul Burch:

Pursuant to Alabama Code §§ 11-47-23, 11-47-192, and 11-12-8, I, Terry Siafa Bailey, hereby provide this sworn ante litem notice of my claims against Mobile County, Alabama, the Mobile County Sheriff's Office, and their officers, employees, and agents, arising from my unlawful arrest on November 15, 2025. The facts stated herein are true and correct to the best of my knowledge and belief.

CLAIMANT INFORMATION

My name is Terry Siafa Bailey; my address is 5510 Rockton Wood Way, Atlanta, Georgia 30331; my phone number is (404) 694-3553; and my email is terrysbailey@gmail.com.

I am a licensed attorney in Atlanta, Georgia. I have no criminal history whatsoever.

DATE, TIME, AND PLACE OF INCIDENT

This incident occurred on November 15, 2025, beginning at approximately 5:38 PM, at or near 312 S. Wilson Avenue, Prichard, Alabama 36610, in front of Lotus Gentlemen's Club.

According to the above referenced November 15, 2025 police report, prepared by the Prichard Police Department, members of the Mobile County Sheriff's Office responded to the scene after the initial stop and search conducted by Prichard Police Department officers and subsequently

assumed responsibility for aspects of the narcotics investigation and detention process. The report further indicates that both I and Brandon Tatum were transported and detained following the Sheriff's Office's involvement.

I contend that I was wrongfully arrested and detained in connection with narcotics offenses that were ultimately dismissed in their entirety on December 3, 2025.

At this time, the full extent of the Mobile County Sheriff's Office's involvement remains under investigation. This notice is therefore provided out of an abundance of caution in order to preserve any claims that may exist under Alabama law and/or federal law arising from the arrest, detention, investigation, transportation, processing, or continued custody of Mr. Bailey.

A copy of my ante litem notice submitted to the City of Prichard is enclosed for reference as "Exhibit A." The allegations and factual assertions contained therein are incorporated herein by reference to the extent applicable.

This notice is not intended to be exhaustive, and all rights, claims, and remedies are expressly reserved.

DAMAGES

As a direct and proximate result of the foregoing conduct, I have suffered damages including but not limited to:

- Loss of liberty and wrongful incarceration
- Attorney's fees, legal expenses, and court costs incurred in defense of false criminal charges
- Lost income and lost professional opportunities as a practicing attorney
- Severe and ongoing emotional distress, mental anguish, and psychological harm
- Reputational harm
- Harm to my professional standing and law practice
- Harm to my family relationships and personal life
- Attorneys' fees pursuant to 42 U.S.C. § 1988

The damages currently exceed **\$1,000,000** by a significant amount, and the full extent of damages continues to be evaluated. All rights to seek additional damages, including punitive damages, are expressly reserved.

PRESERVATION OF EVIDENCE

Mobile County, the Mobile County Sheriff's Office, and all officers, employees, and agents are hereby placed on notice to immediately preserve all evidence related to this incident and to the officers involved, including but not limited to:

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- All dash camera footage
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- The complete incident report (Agency Case No. 251100110), all drafts, and all supplements, and all related reports
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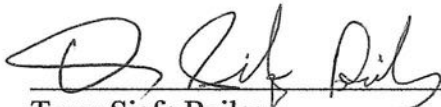
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I intend to pursue all available legal remedies arising from this incident, including litigation in both state and federal court. This notice is not intended as a complete statement of all facts, claims, witnesses, or damages, and all rights are expressly reserved.

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I, Terry Siafa Bailey, being first duly sworn, state under oath that I have read the foregoing Ante Litem Notice and that the facts stated herein are true and correct to the best of my knowledge, information, and belief.


Terry Siafa Bailey
5510 Rockton Wood Way
Atlanta, Georgia 30331

5/13/26
Dated

This notice is submitted pursuant to Ala. Code §§ 11-47-23, 11-47-192 and 11-12-8.

Sworn to and subscribed before me this 13 day of May, 2026.

 [Seal]

Notary Public State of Georgia

My Commission Expires: 8/19/2029



EXHIBIT A

VIA CERTIFIED MAIL

May 12, 2026

Jacqueline A. Niles, City Clerk
City Clerk's Office
Prichard City Hall
2106 E. Prichard Ave.
Prichard, AL 36610

**RE: CLAIMANT TERRY SIAFA BAILEY'S ANTE LITEM NOTICE OF CLAIM
PURSUANT TO ALA. CODE § 11-47-23 AND § 11-47-192**

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On November 15, 2025, I was the victim of a premeditated conspiracy in which private actors lured me to Prichard, Alabama under the pretense of a legitimate business meeting, planted controlled substances in my rental vehicle without my knowledge, and coordinated with officers of the Prichard Police Department to conduct an unlawful traffic stop of my legally parked vehicle, execute an unlawful search of that vehicle, and effectuate my wrongful arrest based on

planted evidence. As the result of the illegal actions of the City of Prichard Police Department, I was wrongfully charged with felony drug trafficking offenses that carry a mandatory sentence of life imprisonment. These charges were dismissed in their entirety within eighteen days of my arrest, which directly substantiates the baseless and false nature of the charges. I suffered significant damages as the result of the City of Prichard's illegal conduct, as outlined herein.

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On the morning of November 15, 2025, I traveled from Atlanta, Georgia to Prichard, Alabama in a 2025 Jeep Grand Wagoneer rental vehicle, accompanied by my driver, Brandon Parker Tatum. My plan was to meet Mr. Anton Harris in Prichard to discuss the business opportunity. Before I left Atlanta, Mr. Harris called me and requested that I give a ride to his acquaintance, an individual known to me only as "Trey," whose real name I later learned was Laparis(h) Lewis. I agreed to that request, and Mr. Lewis entered the vehicle in Atlanta, Georgia. During a gas station stop in Fort Deposit, Alabama, Mr. Lewis feigned losing his wallet, causing a distraction. It is my belief that it was during this stop that Lewis planted a bag containing controlled substances behind my seat of the rental vehicle without my knowledge or consent.

After I arrived in Prichard, Lewis was dropped off at a residence near the Lotus Gentlemen's Club. We then parked the rental vehicle legally on S. Wilson Avenue in front of Lotus Gentlemen's Club and waited for Anton Harris and his business partners to arrive for the purported business meeting. There was never a legitimate business meeting. I have since confirmed that the entire arrangement was a set up designed to obtain my false arrest by the City of Prichard Police Department.

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According to the police report, Officer Terrance J. Palmore (Officer ID No. 20384) was the first to approach my vehicle and requested identification. Officer Palmore asked whether there was anything illegal in the vehicle. Mr. Tatum and I both stated there was not. Officer Palmore requested consent to search the vehicle. Mr. Tatum declined. Officer Palmore then addressed me

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When I asked for the basis of the detention, Officer Palmore falsely claimed to detect the odor of marijuana emanating from the vehicle. This claim was false and without factual basis. There was no marijuana in the vehicle. The vehicle was a brand-new rental car that had been cleaned prior to my taking possession of it that morning. There were no other individuals in the immediate vicinity on our side of the street — the entire block in front of the vehicle was unoccupied. The claim that marijuana odor was coming from a nearby source is not credible and lacks evidentiary support.

Officer Palmore then stated that if we did not consent to a search, he would arrange for a K-9 unit to respond. We declined consent and indicated we were prepared to wait for the K-9 unit. Despite this, and despite the absence of a warrant, consent, or arrival of any K-9 unit, Officer Palmore and other Prichard officers instructed us to exit the vehicle and proceeded to conduct a warrantless search. This search violated my legal rights under federal law and Alabama law.

According to the police report, the search was conducted by Officer Palmore, Officer R. Jones, Officer Robison, and Investigator Ryan Spencer Phillips. No marijuana was found — directly corroborating my representation that there was none. During the search of the vehicle, officers searched a bookbag and found a sandwich-style Ziploc bag containing controlled substances. I did not place any controlled substances in that bag or in the vehicle. These substances were planted in my vehicle by other individuals, likely including Laparish Lewis. The fabrication of evidence violated my rights under federal law and Alabama law.

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Additionally, Phillips is under active investigation in connection with the fatal shooting of his roommate, San Juania Coronado, at his personal residence in February 2026. According to public reports, the Mobile County District Attorney's Office is leading that investigation.

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E. Other Incidents at the Prichard Police Department

My claim against the City of Prichard and the Prichard Police Department arises in the context of other public incidents, showing a continued failure to train, supervise, and discipline officers for misconduct. As a few examples, in April 2021, an officer was arrested for computer tampering and ethics violations after he illegally used a law enforcement database to get information on people;² in August 2025, an officer kept an arrestee's phone, went through it, and sent compromising photos to the arrestee's wife;³ in September 2024, a detective was charged with perjury after he told several material falsehoods to the Mobile County District Attorney's Office, which were related to the dismissal of a murder investigation;⁴ and now, most recently, in November 2025 and March 2026, my own case and the indictment of Investigator Phillips demonstrate that the City's failure to train, supervise, and discipline its officers continues to cause significant harm. In fact, after Investigator Phillips was indicted for tampering with evidence, the Mobile County Sheriff's Office announced that it was partnering with the City of

¹ <https://www.fox10tv.com/2026/04/01/prichard-police-officer-under-investigation-fatal-shooting-pleads-not-guilty-federal-gun-charge/>;

<https://mynbc15.com/news/local/prichard-officer-accused-of-taking-gun-from-crash-scene-while-on-duty-federal-affidavit-s>; <https://www.al.com/crime/2026/03/alabama-police-officer-investigated-in-womans-shooting-death-arrested-for-stolen-guns.html>

² <https://www.wkrg.com/top-stories/prichard-police-officer-arrested-and-charged-with-computer-tampering-ethics-violations/>

³ <https://www.wkrg.com/mobile-county/prichard-police-officer-accused-of-withholding-evidence-sending-explicit-images-mcso/>

⁴ <https://www.fox10tv.com/2024/09/04/prichard-police-detective-arrested-charged-with-perjury/>

Prichard to attempt to improve the deficiencies in its officer training program and overhaul Prichard Police Department's evidence room.⁵

SUMMARY OF CLAIMS

This notice gives rise to claims against the City of Prichard, the Prichard Police Department, and their officers, agents, and employees, including but not limited to the following:

- Unlawful stop and detention in violation of the Fourth Amendment to the United States Constitution (42 U.S.C. § 1983)
- Unlawful warrantless search in violation of the Fourth Amendment (42 U.S.C. § 1983)
- Fabrication of evidence and fabrication of false probable cause in violation of the Fourth and Fourteenth Amendments (42 U.S.C. § 1983)
- Civil rights conspiracy between officers and private actors (42 U.S.C. §§ 1983, 1985)
- Municipal liability for violations of 42 U.S.C. § 1983 under *Monell v. Department of Soc. Svcs.*, 436 U.S. 658 (1978), *City of Canton, Ohio v. Harris*, 489 U.S. 378 (1989), and their progeny
- False arrest and false imprisonment under Alabama law
- Malicious prosecution under Alabama law
- Civil conspiracy under Alabama law
- Abuse of process under Alabama law
- Intentional infliction of emotional distress under Alabama law
- Negligent hiring, supervision, and retention of Officer Palmore, Investigator Phillips, and other involved officers
- All other claims available at law and in equity

This recitation of claims is not exhaustive, and all rights are expressly reserved.

DAMAGES

As a direct and proximate result of the foregoing conduct, I have suffered damages including but not limited to:

- Loss of liberty and wrongful incarceration
- Attorney's fees, legal expenses, and court costs incurred in defense of false criminal charges
- Lost income and lost professional opportunities as a practicing attorney
- Severe and ongoing emotional distress, mental anguish, and psychological harm
- Reputational harm
- Harm to my professional standing and law practice
- Harm to my family relationships and personal life
- Attorneys' fees pursuant to 42 U.S.C. § 1988

⁵ <https://www.fox10tv.com/2026/03/16/prichard-works-with-mcso-improve-administrative-processes/>

The damages currently exceed **\$1,000,000** by a significant amount, and the full extent of damages continues to be evaluated. All rights to seek additional damages, including punitive damages, are expressly reserved.

PRESERVATION OF EVIDENCE

The City of Prichard, the Prichard Police Department, and all officers, employees, and agents are hereby placed on notice to immediately preserve all evidence related to this incident and to the officers involved, including but not limited to:

- All body-worn camera footage from all officers present on November 15, 2025
- All dash camera footage
- All dispatch logs, CAD records, and radio communications for November 15, 2025
- The complete incident report (Agency Case No. 251100110), all drafts, and all supplements, and all related reports
- All internal communications regarding the stop, search, arrest, or investigation of Terry Bailey and/or Brandon Tatum
- All records relating to any tip, call, or communication that preceded the stop
- All records relating to Officer Palmore, Investigator Phillips, Officer R. Jones, and Officer Robison, including personnel files, disciplinary records, internal affairs complaints, and prior misconduct investigations
- All records relating to Emmanuel Dotch, including personnel files, disciplinary records, and any investigation into his conduct
- All records relating to the Prichard Police Department ethics investigation referenced in public reporting
- All records relating to the Mobile County Sheriff's Office's effort to overhaul the City of Prichard evidence room and training program
- All records relating to Investigator Phillips' involvement in other evidence handling, drug cases, or property seizures during his tenure with Prichard PD
- All communications between any Prichard PD officer and any private individual regarding Terry Bailey, Brandon Tatum, or the November 15, 2025 stop
- Surveillance footage from the area of 312 S. Wilson Avenue for the period November 14–15, 2025
- All booking records, bond records, and charging documents related to this matter

Failure to preserve this evidence may result in additional claims, sanctions, and adverse inference instructions in any subsequent litigation.

I intend to pursue all available legal remedies arising from this incident, including litigation in both state and federal court. This notice is not intended as a complete statement of all facts, claims, witnesses, or damages, and all rights are expressly reserved.

Signatures on Following Page

SWORN STATEMENT OF TERRY SIAFA BAILEY

I, Terry Siafa Bailey, being first duly sworn, state under oath that I have read the foregoing Ante Litem Notice and that the facts stated herein are true and correct to the best of my knowledge, information, and belief.


Terry Siafa Bailey
5510 Rockton Wood Way
Atlanta, Georgia 30331

5/12/26
Dated

This notice is submitted pursuant to Ala. Code §§ 11-47-23 and 11-47-192.

Sworn to and subscribed before me this 12 day of May, 2026.

 [Seal]



Notary Public State of Georgia

My Commission Expires: 12-3-29

VIA CERTIFIED MAIL

2026 MAY 15 9:38AM

May 13, 2026

County Administrator (Eddie Kerr)
Mobile County Commission
205 Government Street
Mobile, AL 36602

Sheriff Paul Burch
Mobile County Sheriff's Office
510 South Royal Street
Mobile, AL 36603

**RE: CLAIMANT BRANDON PARKER TATUM'S ANTE LITEM NOTICE OF
CLAIM PURSUANT TO ALA. CODE §§ 11-47-23, 11-47-192, 11-12-8**

Claimant: Brandon Parker Tatum
Date of Incident: November 15, 2025
Prichard Police Department Case Number: 251100110 / S25-11-0253
Mobile County District Court Case Numbers: DC-2025-909063.00,
DC-2025-909064.00, DC-2025-909065.00, DC-2025-909066.00, DC-2025-909067.00

To the County Administrator of Mobile County Commission and to Sheriff Paul Burch:

Pursuant to Alabama Code §§ 11-47-23, 11-47-192, and 11-12-8, I, Brandon Parker Tatum hereby provide this sworn ante litem notice of my claims against Mobile County, Alabama, the Mobile County Sheriff's Office, and their officers, employees, and agents, arising from my unlawful arrest on November 15, 2025. The facts stated herein are true and correct to the best of my knowledge and belief.

CLAIMANT INFORMATION

My name is Brandon Parker Tatum; my mailing address is P.O. Box 795 Pine Lake, GA 30072; my phone number is (470) 385-0221; and my email is aotlog@gmail.com.

I am a truck driver, basketball coach, and business owner in Atlanta, Georgia.

DATE, TIME, AND PLACE OF INCIDENT

This incident occurred on November 15, 2025, beginning at approximately 5:38 PM, at or near 312 S. Wilson Avenue, Prichard, Alabama 36610, in front of Lotus Gentlemen's Club.

According to the above referenced November 15, 2025 police report, prepared by the Prichard Police Department, members of the Mobile County Sheriff's Office responded to the scene after the initial stop and search conducted by Prichard Police Department officers and subsequently

assumed responsibility for aspects of the narcotics investigation and detention process. The report further indicates that both I and Terry Bailey were transported and detained following the Sheriff's Office's involvement.

I contend that I was wrongfully arrested and detained in connection with narcotics offenses that were ultimately dismissed in their entirety on December 3, 2025.

At this time, the full extent of the Mobile County Sheriff's Office's involvement remains under investigation. This notice is therefore provided out of an abundance of caution in order to preserve any claims that may exist under Alabama law and/or federal law arising from the arrest, detention, investigation, transportation, processing, or continued custody of Mr. Tatum.

A copy of my ante litem notice submitted to the City of Prichard is enclosed for reference as "Exhibit A." The allegations and factual assertions contained therein are incorporated herein by reference to the extent applicable.

This notice is not intended to be exhaustive, and all rights, claims, and remedies are expressly reserved.

DAMAGES

As a direct and proximate result of the foregoing conduct, I have suffered damages including but not limited to:

- Loss of liberty and wrongful incarceration
- Attorney's fees, legal expenses, and court costs incurred in defense of false criminal charges
- Lost income and lost professional opportunities
- Severe and ongoing emotional distress, mental anguish, and psychological harm
- Reputational harm
- Harm to my professional standing and law practice
- Harm to my family relationships and personal life
- Attorneys' fees pursuant to 42 U.S.C. § 1988

The damages currently exceed **\$1,000,000** by a significant amount, and the full extent of damages continues to be evaluated. All rights to seek additional damages, including punitive damages, are expressly reserved.

PRESERVATION OF EVIDENCE

Mobile County, the Mobile County Sheriff's Office, and all officers, employees, and agents are hereby placed on notice to immediately preserve all evidence related to this incident and to the officers involved, including but not limited to:

- All body-worn camera footage and interrogation footage from all officers present on November 15, 2025

- All dash camera footage
- All dispatch logs, CAD records, and radio communications for November 15, 2025
- The complete incident report (Agency Case No. 251100110), all drafts, and all supplements, and all related reports
- All internal communications regarding the stop, search, arrest, or investigation of Terry Bailey and/or Brandon Tatum
- All records relating to any tip, call, or communication that preceded the stop
- All records relating to the Prichard Police Department ethics investigation referenced in public reporting
- All records relating to the Mobile County Sheriff's Office's effort to overhaul the City of Prichard evidence room and training program
- All records relating to Investigator Phillips' involvement in other evidence handling, drug cases, or property seizures during his tenure with Prichard PD
- All communications between any Mobile Sheriff's officer and any private individual regarding Terry Bailey, Brandon Tatum, or the November 15, 2025 stop
- Surveillance footage from the area of 312 S. Wilson Avenue for the period November 14–15, 2025
- All booking records, bond records, and charging documents related to this matter

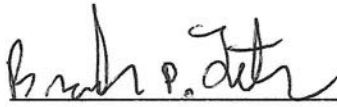
Failure to preserve this evidence may result in additional claims, sanctions, and adverse inference instructions in any subsequent litigation.

I intend to pursue all available legal remedies arising from this incident, including litigation in both state and federal court. This notice is not intended as a complete statement of all facts, claims, witnesses, or damages, and all rights are expressly reserved.

Signatures on Following Page

SWORN STATEMENT OF BRANDON PARKER TATUM

I, Brandon Parker Tatum, being first duly sworn, state under oath that I have read the foregoing Ante Litem Notice and that the facts stated herein are true and correct to the best of my knowledge, information, and belief.

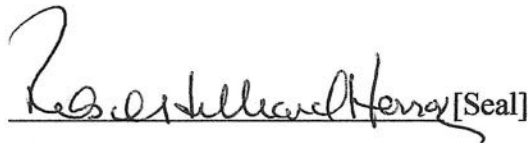


Brandon Parker Tatum
P.O. Box 795
Pine Lake, GA 30072

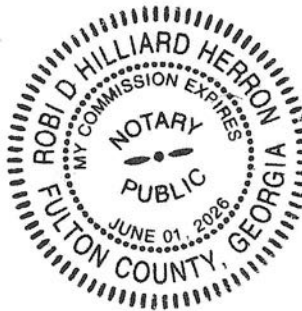
5-13-26
Dated

This notice is submitted pursuant to Ala. Code §§ 11-47-23 11-47-192, and 11-12-8.

Sworn to and subscribed before me this 13 day of May, 2026.

 [Seal]

Notary Public State of Georgia



My Commission Expires: June 1, 2026

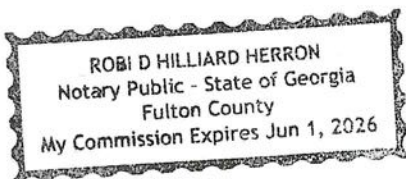


EXHIBIT A

VIA CERTIFIED MAIL

May 13, 2026

Jacqueline A. Niles, City Clerk
City Clerk's Office
Prichard City Hall
2106 E. Prichard Ave.
Prichard, AL 36610

**RE: CLAIMANT BRANDON PARKER TATUM'S ANTE LITEM NOTICE OF
CLAIM PURSUANT TO ALA. CODE § 11-47-23 AND § 11-47-192**

Claimant: Brandon Parker Tatum
Date of Incident: November 15, 2025
Prichard Police Department Case Number: 251100110 / S25-11-0253
Mobile County District Court Case Numbers: DC-2025-909063.00,
DC-2025-909064.00, DC-2025-909065.00, DC-2025-909066.00, DC-2025-909067.00

To the City Clerk of the City of Prichard, Alabama:

Pursuant to Alabama Code § 11-47-23 and § 11-47-192, I, Brandon Parker Tatum, hereby provide this sworn ante litem notice of my claims against the City of Prichard, Alabama, the Prichard Police Department, and their officers, employees, and agents, arising from my unlawful arrest on November 15, 2025. The facts stated herein are true and correct to the best of my knowledge and belief.

CLAIMANT INFORMATION

My name is Brandon Parker Tatum; my mailing address is P.O. Box 795 Pine Lake, GA 30072; my phone number is (470) 385-0221; and my email is aotlog@gmail.com

I am a truck driver, basketball coach, and business owner in Atlanta, Georgia.

DATE, TIME, AND PLACE OF INCIDENT

This incident occurred on November 15, 2025, beginning at approximately 5:38 PM, at or near 312 S. Wilson Avenue, Prichard, Alabama 36610, in front of Lotus Gentlemen's Club.

MANNER IN WHICH THE INJURY WAS RECEIVED

On November 15, 2025, I was the victim of a premeditated conspiracy in which private actors lured me and Mr. Terry Bailey to Prichard, Alabama under the pretense of a legitimate business meeting, planted controlled substances in our rental vehicle without our knowledge, and coordinated with officers of the Prichard Police Department to conduct an unlawful traffic stop of my legally parked vehicle, execute an unlawful search of that vehicle, and effectuate my

wrongful arrest based on planted evidence. As the result of the illegal actions of the City of Prichard Police Department, I was wrongfully charged with felony drug trafficking offenses that carry a mandatory sentence of life imprisonment. These charges were dismissed in their entirety within eighteen days of my arrest, which directly substantiates the baseless and false nature of the charges. I suffered significant damages as the result of the City of Prichard's illegal conduct, as outlined herein.

A. Background and Luring Operation

In October 2025, Mr. Bailey was contacted by an individual known to me as "JP," whose real name we later learned was Anton Harris. Mr. Harris represented that he had a legitimate business opportunity in Alabama requiring legal consultation. The business opportunity involved the purchase of a club. As an attorney, Mr. Bailey has assisted other clients with these types of transactions in the past, so I Mr. Bailey that Mr. Harris was seeking my professional expertise. Following a paid in-person consultation in Tucker, Georgia on approximately October 17, 2025, Mr. Bailey agreed to travel to Alabama to review potential commercial locations for Mr. Harris. Mr. was paid a consultation fee and had no reason to suspect any unlawful purpose. Mr. Bailey hired me to drive him to Alabama.

On the morning of November 15, 2025, I traveled from Atlanta, Georgia to Prichard, Alabama in a 2025 Jeep Grand Wagoneer rental vehicle that was rented by Mr. Bailey. Before we left Mr. Bailey requested that I give a ride to an acquaintance of Mr. Harris, an individual known only as "Trey," whose real name we later learned was Laparis(h) Lewis. I agreed to Mr. Bailey's request, and Mr. Lewis entered the vehicle in Atlanta, Georgia. During a gas station stop in Fort Deposit, Alabama, Mr. Lewis feigned losing his wallet, causing a distraction. It was during this stop that Lewis planted a bag containing controlled substances behind Mr. Bailey's seat in the rental vehicle without my knowledge or consent.

After we arrived in Prichard, Lewis was dropped off at a residence near the Lotus Gentlemen's Club. We then parked the rental vehicle legally on S. Wilson Avenue in front of Lotus Gentlemen's Club and waited for Anton Harris and his business partners to arrive for the purported business meeting. There was never a legitimate business meeting. We have since confirmed that the entire arrangement was a set up designed to obtain our false arrest by the City of Prichard Police Department.

B. Stop and Search

While legally parked at or near 312 S. Wilson Avenue, no less than three police cars from the City of Prichard Police Department simultaneously activated their emergency lights and surrounded our vehicle. There was no lawful basis for this coordinated stop whatsoever. The vehicle was legally parked and neither Mr. Bailey nor I had engaged in *any* unlawful conduct. This stop violated my legal rights under federal law and Alabama law.

According to the police report, Officer Terrance J. Palmore (Officer ID No. 20384) was the first to approach my vehicle and requested identification. Officer Palmore asked whether there was anything illegal in the vehicle. Mr. Bailey and I both stated there was not. Officer Palmore

requested consent to search the vehicle. I declined. Officer Palmore then addressed Mr. Bailey directly and requested his consent. He declined as well. Mr. Bailey asked Officer Palmore whether we were being detained. He confirmed that we were.

When Mr. Bailey asked for the basis of the detention, Officer Palmore falsely claimed to detect the odor of marijuana emanating from the vehicle. This claim was false and without factual basis. There was no marijuana in the vehicle. The vehicle was a brand-new rental car that had been cleaned prior to my taking possession of it that morning. There were no other individuals in the immediate vicinity on our side of the street — the entire block in front of the vehicle was unoccupied. The claim that marijuana odor was coming from a nearby source is not credible and lacks evidentiary support.

Officer Palmore then stated that if we did not consent to a search, he would arrange for a K-9 unit to respond. We declined consent and indicated we were prepared to wait for the K-9 unit. Despite this, and despite the absence of a warrant, consent, or arrival of any K-9 unit, Officer Palmore and other Prichard officers instructed us to exit the vehicle and proceeded to conduct a warrantless search. This search violated my legal rights under federal law and Alabama law.

According to the police report, the search was conducted by Officer Palmore, Officer R. Jones, Officer Robison, and Investigator Ryan Spencer Phillips. No marijuana was found — directly corroborating my representation that there was none. During the search of the vehicle, officers searched a bookbag and found a sandwich-style Ziploc bag containing controlled substances. I did not place any controlled substances in that bag or in the vehicle. These substances were planted in our vehicle by other individuals, likely including Laparish Lewis. The fabrication of evidence violated my rights under federal law and Alabama law.

Further, my arrest on November 15, 2025 was a coordinated event that necessarily required the agreement and coordination of multiple individuals, including those who work at the Prichard Police Department. To be sure, my arrest was not a random isolated incident but rather part of a coordinated plan to arrest me for crimes that I did not commit. Officers from the Prichard Police Department played an indispensable role in that conspiracy. That conspiracy violated my rights under federal law and Alabama law.

C. Dismissal of All Charges

On December 3, 2025, the State of Alabama completely and summarily dismissed all five fabricated charges pending against me. The motion to dismiss was granted the day it was filed by District Judge Deborah D. Tillman. All charges were dismissed eighteen days after my arrest. The speed of this dismissal, and the absence of any further investigation, confirms that the charges had absolutely no legitimate basis.

D. Investigator Ryan Spencer Phillips — Federal Indictment for Evidence Tampering

As mentioned, Investigator Ryan Spencer Phillips was one of the officers who conducted the unlawful search of my vehicle and, according to the police report, took custody of and secured in his patrol vehicle the bookbag in which the planted narcotics were found. I vividly remember

that Investigator Phillips played an active role in the search of my vehicle, my detention, and my arrest. *Investigator Ryan Spencer Phillips has since been federally indicted in the United States District Court for the Southern District of Alabama (Case No. 1:26-cr-00059-JB-N) on charges of Possession of a Stolen Firearm in violation of 18 U.S.C. § 922(j), filed March 25, 2026.* According to the indictment and public media reports, Phillips stole firearms from a crime/accident scene he was investigating while on duty as a police officer for the Prichard Police Department. Phillips is currently in jail without bond pending trial in federal court.¹ Officer Phillips' theft and manipulation of crime scene evidence occurred mere months after his involvement in my illegal and coordinated traffic stop involving planted evidence.

Additionally, Phillips is under active investigation in connection with the fatal shooting of his roommate, San Juania Coronado, at his personal residence in February 2026. According to public reports, the Mobile County District Attorney's Office is leading that investigation.

An officer who steals and manipulates physical evidence from scenes he investigates in his official capacity — as a federal grand jury has now found probable cause to charge — is an officer capable of manipulating evidence at any scene. Phillips' recent alleged criminal conduct is directly relevant to my claim disclosed herein that he and others participated in concerted conduct that violated my legal rights. Phillips' recent alleged criminal conduct is also directly relevant to the City's obligation to supervise and discipline its officers, and to the City's liability for retaining an officer whose propensity for egregious evidence tampering was or should have been known.

E. Other Incidents at the Prichard Police Department

My claim against the City of Prichard and the Prichard Police Department arises in the context of other public incidents, showing a continued failure to train, supervise, and discipline officers for misconduct. As a few examples, in April 2021, an officer was arrested for computer tampering and ethics violations after he illegally used a law enforcement database to get information on people;² in August 2025, an officer kept an arrestee's phone, went through it, and sent compromising photos to the arrestee's wife;³ in September 2024, a detective was charged with perjury after he told several material falsehoods to the Mobile County District Attorney's Office, which were related to the dismissal of a murder investigation;⁴ and now, most recently, in November 2025 and March 2026, my own case and the indictment of Investigator Phillips demonstrate that the City's failure to train, supervise, and discipline its officers continues to cause significant harm. In fact, after Investigator Phillips was indicted for tampering with evidence, the Mobile County Sheriff's Office announced that it was partnering with the City of

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Prichard to attempt to improve the deficiencies in its officer training program and overhaul Prichard Police Department's evidence room.⁵

SUMMARY OF CLAIMS

This notice gives rise to claims against the City of Prichard, the Prichard Police Department, and their officers, agents, and employees, including but not limited to the following:

- Unlawful stop and detention in violation of the Fourth Amendment to the United States Constitution (42 U.S.C. § 1983)
- Unlawful warrantless search in violation of the Fourth Amendment (42 U.S.C. § 1983)
- Fabrication of evidence and fabrication of false probable cause in violation of the Fourth and Fourteenth Amendments (42 U.S.C. § 1983)
- Civil rights conspiracy between officers and private actors (42 U.S.C. §§ 1983, 1985)
- Municipal liability for violations of 42 U.S.C. § 1983 under *Monell v. Department of Soc. Svcs.*, 436 U.S. 658 (1978), *City of Canton, Ohio v. Harris*, 489 U.S. 378 (1989), and their progeny
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- Malicious prosecution under Alabama law
- Civil conspiracy under Alabama law
- Abuse of process under Alabama law
- Intentional infliction of emotional distress under Alabama law
- Negligent hiring, supervision, and retention of Officer Palmore, Investigator Phillips, and other involved officers
- All other claims available at law and in equity

This recitation of claims is not exhaustive, and all rights are expressly reserved.

DAMAGES

As a direct and proximate result of the foregoing conduct, I have suffered damages including but not limited to:

- Loss of liberty and wrongful incarceration
- Attorney's fees, legal expenses, and court costs incurred in defense of false criminal charges
- Lost income and lost professional opportunities as a driver, basketball coach, and business owner
- Severe and ongoing emotional distress, mental anguish, and psychological harm
- Reputational harm
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- Attorneys' fees pursuant to 42 U.S.C. § 1988

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The damages currently exceed \$1,000,000 by a significant amount, and the full extent of damages continues to be evaluated. All rights to seek additional damages, including punitive damages, are expressly reserved.

PRESERVATION OF EVIDENCE

The City of Prichard, the Prichard Police Department, and all officers, employees, and agents are hereby placed on notice to immediately preserve all evidence related to this incident and to the officers involved, including but not limited to:

- All body-worn camera footage from all officers present on November 15, 2025
- All dash camera footage
- All dispatch logs, CAD records, and radio communications for November 15, 2025
- The complete incident report (Agency Case No. 251100110), all drafts, and all supplements, and all related reports
- All internal communications regarding the stop, search, arrest, or investigation of Terry Bailey and/or Brandon Tatum
- All records relating to any tip, call, or communication that preceded the stop
- All records relating to Officer Palmore, Investigator Phillips, Officer R. Jones, and Officer Robison, including personnel files, disciplinary records, internal affairs complaints, and prior misconduct investigations
- All records relating to Emmanuel Dotch, including personnel files, disciplinary records, and any investigation into his conduct
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- All booking records, bond records, and charging documents related to this matter

Failure to preserve this evidence may result in additional claims, sanctions, and adverse inference instructions in any subsequent litigation.

I intend to pursue all available legal remedies arising from this incident, including litigation in both state and federal court. This notice is not intended as a complete statement of all facts, claims, witnesses, or damages, and all rights are expressly reserved.

Signatures on Following Page

SWORN STATEMENT OF BRANDON PARKER TATUM

I, Brandon Parker Tatum, being first duly sworn, state under oath that I have read the foregoing Ante Litem Notice and that the facts stated herein are true and correct to the best of my knowledge, information, and belief.

Brandon P. Tatum

Brandon Parker Tatum
P.O. Box 795
Pine Lake, GA 30072

5-13-26

Dated

This notice is submitted pursuant to Ala. Code §§ 11-47-23 and 11-47-192.

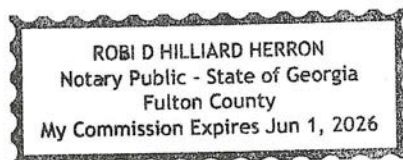
Sworn to and subscribed before me this 13 day of May, 2026.

Robi D. Hilliard Herron [Seal]

Notary Public State of Georgia



My Commission Expires: June 1, 2026



VIA CERTIFIED MAIL

May 13, 2026

Jacqueline A. Niles, City Clerk
City Clerk's Office
Prichard City Hall
2106 E. Prichard Ave.
Prichard, AL 36610

RECEIVED MAY 15 2026
M. J. Niles
9:00 AM

**RE: CLAIMANT BRANDON PARKER TATUM'S ANTE LITEM NOTICE OF
CLAIM PURSUANT TO ALA. CODE § 11-47-23 AND § 11-47-192**

Claimant: Brandon Parker Tatum
Date of Incident: November 15, 2025
Prichard Police Department Case Number: 251100110 / S25-11-0253
Mobile County District Court Case Numbers: DC-2025-909063.00,
DC-2025-909064.00, DC-2025-909065.00, DC-2025-909066.00, DC-2025-909067.00

To the City Clerk of the City of Prichard, Alabama:

Pursuant to Alabama Code § 11-47-23 and § 11-47-192, I, Brandon Parker Tatum, hereby provide this sworn ante litem notice of my claims against the City of Prichard, Alabama, the Prichard Police Department, and their officers, employees, and agents, arising from my unlawful arrest on November 15, 2025. The facts stated herein are true and correct to the best of my knowledge and belief.

CLAIMANT INFORMATION

My name is Brandon Parker Tatum; my mailing address is P.O. Box 795 Pine Lake, GA 30072; my phone number is (470) 385-0221; and my email is aotlog@gmail.com

I am a truck driver, basketball coach, and business owner in Atlanta, Georgia.

DATE, TIME, AND PLACE OF INCIDENT

This incident occurred on November 15, 2025, beginning at approximately 5:38 PM, at or near 312 S. Wilson Avenue, Prichard, Alabama 36610, in front of Lotus Gentlemen's Club.

MANNER IN WHICH THE INJURY WAS RECEIVED

On November 15, 2025, I was the victim of a premeditated conspiracy in which private actors lured me and Mr. Terry Bailey to Prichard, Alabama under the pretense of a legitimate business meeting, planted controlled substances in our rental vehicle without our knowledge, and coordinated with officers of the Prichard Police Department to conduct an unlawful traffic stop of my legally parked vehicle, execute an unlawful search of that vehicle, and effectuate my

wrongful arrest based on planted evidence. As the result of the illegal actions of the City of Prichard Police Department, I was wrongfully charged with felony drug trafficking offenses that carry a mandatory sentence of life imprisonment. These charges were dismissed in their entirety within eighteen days of my arrest, which directly substantiates the baseless and false nature of the charges. I suffered significant damages as the result of the City of Prichard's illegal conduct, as outlined herein.

A. Background and Luring Operation

In October 2025, Mr. Bailey was contacted by an individual known to me as "JP," whose real name we later learned was Anton Harris. Mr. Harris represented that he had a legitimate business opportunity in Alabama requiring legal consultation. The business opportunity involved the purchase of a club. As an attorney, Mr. Bailey has assisted other clients with these types of transactions in the past, so I Mr. Bailey that Mr. Harris was seeking my professional expertise. Following a paid in-person consultation in Tucker, Georgia on approximately October 17, 2025, Mr. Bailey agreed to travel to Alabama to review potential commercial locations for Mr. Harris. Mr. was paid a consultation fee and had no reason to suspect any unlawful purpose. Mr. Bailey hired me to drive him to Alabama.

On the morning of November 15, 2025, I traveled from Atlanta, Georgia to Prichard, Alabama in a 2025 Jeep Grand Wagoneer rental vehicle that was rented by Mr. Bailey. Before we left Mr. Bailey requested that I give a ride to an acquaintance of Mr. Harris, an individual known only as "Trey," whose real name we later learned was Laparis(h) Lewis. I agreed to Mr. Bailey's request, and Mr. Lewis entered the vehicle in Atlanta, Georgia. During a gas station stop in Fort Deposit, Alabama, Mr. Lewis feigned losing his wallet, causing a distraction. It was during this stop that Lewis planted a bag containing controlled substances behind Mr. Bailey's seat in the rental vehicle without my knowledge or consent.

After we arrived in Prichard, Lewis was dropped off at a residence near the Lotus Gentlemen's Club. We then parked the rental vehicle legally on S. Wilson Avenue in front of Lotus Gentlemen's Club and waited for Anton Harris and his business partners to arrive for the purported business meeting. There was never a legitimate business meeting. We have since confirmed that the entire arrangement was a set up designed to obtain our false arrest by the City of Prichard Police Department.

B. Stop and Search

While legally parked at or near 312 S. Wilson Avenue, no less than three police cars from the City of Prichard Police Department simultaneously activated their emergency lights and surrounded our vehicle. There was no lawful basis for this coordinated stop whatsoever. The vehicle was legally parked and neither Mr. Bailey nor I had engaged in *any* unlawful conduct. This stop violated my legal rights under federal law and Alabama law.

According to the police report, Officer Terrance J. Palmore (Officer ID No. 20384) was the first to approach my vehicle and requested identification. Officer Palmore asked whether there was anything illegal in the vehicle. Mr. Bailey and I both stated there was not. Officer Palmore

requested consent to search the vehicle. I declined. Officer Palmore then addressed Mr. Bailey directly and requested his consent. He declined as well. Mr. Bailey asked Officer Palmore whether we were being detained. He confirmed that we were.

When Mr. Bailey asked for the basis of the detention, Officer Palmore falsely claimed to detect the odor of marijuana emanating from the vehicle. This claim was false and without factual basis. There was no marijuana in the vehicle. The vehicle was a brand-new rental car that had been cleaned prior to my taking possession of it that morning. There were no other individuals in the immediate vicinity on our side of the street — the entire block in front of the vehicle was unoccupied. The claim that marijuana odor was coming from a nearby source is not credible and lacks evidentiary support.

Officer Palmore then stated that if we did not consent to a search, he would arrange for a K-9 unit to respond. We declined consent and indicated we were prepared to wait for the K-9 unit. Despite this, and despite the absence of a warrant, consent, or arrival of any K-9 unit, Officer Palmore and other Prichard officers instructed us to exit the vehicle and proceeded to conduct a warrantless search. This search violated my legal rights under federal law and Alabama law.

According to the police report, the search was conducted by Officer Palmore, Officer R. Jones, Officer Robison, and Investigator Ryan Spencer Phillips. No marijuana was found — directly corroborating my representation that there was none. During the search of the vehicle, officers searched a bookbag and found a sandwich-style Ziploc bag containing controlled substances. I did not place any controlled substances in that bag or in the vehicle. These substances were planted in our vehicle by other individuals, likely including Laparish Lewis. The fabrication of evidence violated my rights under federal law and Alabama law.

Further, my arrest on November 15, 2025 was a coordinated event that necessarily required the agreement and coordination of multiple individuals, including those who work at the Prichard Police Department. To be sure, my arrest was not a random isolated incident but rather part of a coordinated plan to arrest me for crimes that I did not commit. Officers from the Prichard Police Department played an indispensable role in that conspiracy. That conspiracy violated my rights under federal law and Alabama law.

C. Dismissal of All Charges

On December 3, 2025, the State of Alabama completely and summarily dismissed all five fabricated charges pending against me. The motion to dismiss was granted the day it was filed by District Judge Deborah D. Tillman. All charges were dismissed eighteen days after my arrest. The speed of this dismissal, and the absence of any further investigation, confirms that the charges had absolutely no legitimate basis.

D. Investigator Ryan Spencer Phillips — Federal Indictment for Evidence Tampering

As mentioned, Investigator Ryan Spencer Phillips was one of the officers who conducted the unlawful search of my vehicle and, according to the police report, took custody of and secured in his patrol vehicle the bookbag in which the planted narcotics were found. I vividly remember

that Investigator Phillips played an active role in the search of my vehicle, my detention, and my arrest. ***Investigator Ryan Spencer Phillips has since been federally indicted in the United States District Court for the Southern District of Alabama (Case No. 1:26-cr-00059-JB-N) on charges of Possession of a Stolen Firearm in violation of 18 U.S.C. § 922(j), filed March 25, 2026.*** According to the indictment and public media reports, Phillips stole firearms from a crime/accident scene he was investigating while on duty as a police officer for the Prichard Police Department. Phillips is currently in jail without bond pending trial in federal court.¹ Officer Phillips' theft and manipulation of crime scene evidence occurred mere months after his involvement in my illegal and coordinated traffic stop involving planted evidence.

Additionally, Phillips is under active investigation in connection with the fatal shooting of his roommate, San Juania Coronado, at his personal residence in February 2026. According to public reports, the Mobile County District Attorney's Office is leading that investigation.

An officer who steals and manipulates physical evidence from scenes he investigates in his official capacity — as a federal grand jury has now found probable cause to charge — is an officer capable of manipulating evidence at any scene. Phillips' recent alleged criminal conduct is directly relevant to my claim disclosed herein that he and others participated in concerted conduct that violated my legal rights. Phillips' recent alleged criminal conduct is also directly relevant to the City's obligation to supervise and discipline its officers, and to the City's liability for retaining an officer whose propensity for egregious evidence tampering was or should have been known.

E. Other Incidents at the Prichard Police Department

My claim against the City of Prichard and the Prichard Police Department arises in the context of other public incidents, showing a continued failure to train, supervise, and discipline officers for misconduct. As a few examples, in April 2021, an officer was arrested for computer tampering and ethics violations after he illegally used a law enforcement database to get information on people;² in August 2025, an officer kept an arrestee's phone, went through it, and sent compromising photos to the arrestee's wife;³ in September 2024, a detective was charged with perjury after he told several material falsehoods to the Mobile County District Attorney's Office, which were related to the dismissal of a murder investigation;⁴ and now, most recently, in November 2025 and March 2026, my own case and the indictment of Investigator Phillips demonstrate that the City's failure to train, supervise, and discipline its officers continues to cause significant harm. In fact, after Investigator Phillips was indicted for tampering with evidence, the Mobile County Sheriff's Office announced that it was partnering with the City of

¹ <https://www.fox10tv.com/2026/04/01/prichard-police-officer-under-investigation-fatal-shooting-pleads-not-guilty-federal-gun-charge/>;
<https://mynbc15.com/news/local/prichard-officer-accused-of-taking-gun-from-crash-scene-while-on-duty-federal-affidavit-s>; <https://www.al.com/crime/2026/03/alabama-police-officer-investigated-in-womans-shooting-death-arrested-for-stolen-guns.html>

² <https://www.wkrq.com/top-stories/prichard-police-officer-arrested-and-charged-with-computer-tampering-ethics-violations/>

³ <https://www.wkrq.com/mobile-county/prichard-police-officer-accused-of-withholding-evidence-sending-explicit-images-mcso/>

⁴ <https://www.fox10tv.com/2024/09/04/prichard-police-detective-arrested-charged-with-perjury/>

Prichard to attempt to improve the deficiencies in its officer training program and overhaul Prichard Police Department's evidence room.⁵

SUMMARY OF CLAIMS

This notice gives rise to claims against the City of Prichard, the Prichard Police Department, and their officers, agents, and employees, including but not limited to the following:

- Unlawful stop and detention in violation of the Fourth Amendment to the United States Constitution (42 U.S.C. § 1983)
- Unlawful warrantless search in violation of the Fourth Amendment (42 U.S.C. § 1983)
- Fabrication of evidence and fabrication of false probable cause in violation of the Fourth and Fourteenth Amendments (42 U.S.C. § 1983)
- Civil rights conspiracy between officers and private actors (42 U.S.C. §§ 1983, 1985)
- Municipal liability for violations of 42 U.S.C. § 1983 under *Monell v. Department of Soc. Svcs.*, 436 U.S. 658 (1978), *City of Canton, Ohio v. Harris*, 489 U.S. 378 (1989), and their progeny
- False arrest and false imprisonment under Alabama law
- Malicious prosecution under Alabama law
- Civil conspiracy under Alabama law
- Abuse of process under Alabama law
- Intentional infliction of emotional distress under Alabama law
- Negligent hiring, supervision, and retention of Officer Palmore, Investigator Phillips, and other involved officers
- All other claims available at law and in equity

This recitation of claims is not exhaustive, and all rights are expressly reserved.

DAMAGES

As a direct and proximate result of the foregoing conduct, I have suffered damages including but not limited to:

- Loss of liberty and wrongful incarceration
- Attorney's fees, legal expenses, and court costs incurred in defense of false criminal charges
- Lost income and lost professional opportunities as a driver, basketball coach, and business owner
- Severe and ongoing emotional distress, mental anguish, and psychological harm
- Reputational harm
- Harm to my professional standing and law practice
- Harm to my family relationships and personal life
- Attorneys' fees pursuant to 42 U.S.C. § 1988

⁵ <https://www.fox10tv.com/2026/03/16/prichard-works-with-mcso-improve-administrative-processes/>

The damages currently exceed \$1,000,000 by a significant amount, and the full extent of damages continues to be evaluated. All rights to seek additional damages, including punitive damages, are expressly reserved.

PRESERVATION OF EVIDENCE

The City of Prichard, the Prichard Police Department, and all officers, employees, and agents are hereby placed on notice to immediately preserve all evidence related to this incident and to the officers involved, including but not limited to:

- All body-worn camera footage from all officers present on November 15, 2025
- All dash camera footage
- All dispatch logs, CAD records, and radio communications for November 15, 2025
- The complete incident report (Agency Case No. 251100110), all drafts, and all supplements, and all related reports
- All internal communications regarding the stop, search, arrest, or investigation of Terry Bailey and/or Brandon Tatum
- All records relating to any tip, call, or communication that preceded the stop
- All records relating to Officer Palmore, Investigator Phillips, Officer R. Jones, and Officer Robison, including personnel files, disciplinary records, internal affairs complaints, and prior misconduct investigations
- All records relating to Emmanuel Dotch, including personnel files, disciplinary records, and any investigation into his conduct
- All records relating to the Prichard Police Department ethics investigation referenced in public reporting
- All records relating to the Mobile County Sheriff's Office's effort to overhaul the City of Prichard evidence room and training program
- All records relating to Investigator Phillips' involvement in other evidence handling, drug cases, or property seizures during his tenure with Prichard PD
- All communications between any Prichard PD officer and any private individual regarding Terry Bailey, Brandon Tatum, or the November 15, 2025 stop
- Surveillance footage from the area of 312 S. Wilson Avenue for the period November 14–15, 2025
- All booking records, bond records, and charging documents related to this matter

Failure to preserve this evidence may result in additional claims, sanctions, and adverse inference instructions in any subsequent litigation.

I intend to pursue all available legal remedies arising from this incident, including litigation in both state and federal court. This notice is not intended as a complete statement of all facts, claims, witnesses, or damages, and all rights are expressly reserved.

Signatures on Following Page

SWORN STATEMENT OF BRANDON PARKER TATUM

I, Brandon Parker Tatum, being first duly sworn, state under oath that I have read the foregoing Ante Litem Notice and that the facts stated herein are true and correct to the best of my knowledge, information, and belief.

Brandon P. Tatum

Brandon Parker Tatum
P.O. Box 795
Pine Lake, GA 30072

5-13-26

Dated

This notice is submitted pursuant to Ala. Code §§ 11-47-23 and 11-47-192.

Sworn to and subscribed before me this 13 day of May, 2026.

Robi D. Hilliard Herron [Seal]

Notary Public State of Georgia



My Commission Expires: June 1, 2026

