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January 18, 2019

Stephen H. Layson, County Administrator
Butts County, Georgia
625 W 3rd Street
Jackson, GA 30233

Certified Mail No. 70180680000096279395

Re: Notification of Claim against Butts County, Georgia (Ante Litem Notice)
Damages to Dr. Thomas H. Sacy for violation of his Constitutional rights and liberties
Date of incident/injury June 27, 2018 through January 18, 2019
Cause of Injury intentional violation of Dr. Sacy's civil rights by Sheriff Gary Long, Deputy
Sheriff Captain Mary Weaver, Deputy Sheriff Lieutenant Lee and Sergeant Pete Henderson

To: BUTTS COUNTY, GEORGIA; Sheriff Gary Long, Butts County; Captain Mary Weaver,
Deputy Sheriff, Butts County ; Lieutenant Lee, Deputy Sheriff, Butts County; and Sergeant Pete
Henderson, Deputy Sheriff, Butts County.

Notice is hereby given to Butts County, Georgia, pursuant to the provisions of O.C.G.A. §36-11-1 of the existence of a claim held by Dr. Thomas H. Sacy against Butts County, Georgia and Sheriff Gary Long, Butts County, Georgia, Sheriff of Butts County, in his official and individual capacity; Captain Mary Weaver, Deputy Sheriff, Butts County, Georgia, in her official and individual capacity; Lieutenant Lee, Deputy Sheriff, Butts County, Georgia, in his official and individual capacity; and Sergeant Pete Henderson, Deputy Sheriff, Butts County, in her/his official and individual capacity. Notice is hereby given of the following causes of action which are known to exist at the present time:

Note: The Sheriff, with the assistance of Captain Mary Weaver and others, have made the grievance process unavailable to Dr. Sacy. They have made the grievance process unavailable by whatever means was necessary including by conduct of the following acts: 1) Failing to provide a hand book to Dr. Sacy for a period of from June 27, 2018 up until the end of October 2018; 2) For failing to explain the grievance process to Dr. Sacy from June 27, 2018 through the end of October 2018; 3) For failing and refusing every demand of Dr. Sacy and his undersigned attorney to provide Dr. Sacy with a grievance form for in excess of 5 months; 4) Captain Mary Weaver made sure that Dr. Sacy did not have the opportunity to turn in grievance forms by being absent from work on the only days, being Monday and Wednesday, that grievance forms could be turned in to her; 5) By making herself absent from the jail block in which Dr. Sacy was being held in an effort to make it impossible for him to turn in his completed grievance form.

By the above conduct and by many other wrongful acts, the Sheriff acting in concert with others, made the grievance process unaccessible and unavailable to Dr. Sacy and thus excused compliance with the grievance process or compliance with any other administrative remedy.

Claim # 1: DENIAL OF ACCESS TO COURTS

The Butts County Sheriff has denied Dr. Sacy his rights to access to the courts. In this regard, not only should the Sheriff and others acting in concert with the Sheriff, refrain from obstructing inmates right of access to the courts, but they also have an affirmative duty and obligation to assure all inmates meaningful access to the courts. In this regard, the Sheriff and other detention center officials must assist inmates in preparing for any defense in their case including they must provide adequate law libraries and assistance from persons trained in the law. The Sheriff has committed any and all acts necessary to prevent Dr. Sacy from accessing the courts which includes denying Dr. Sacy the right to defend himself in a pending case in the United States District Court, Middle District of Georgia, Macon Division, being Case Number 5:18-cr-00048-TES-CHW.

(A) In this regard the Sheriff has violated a Federal Court Order of Judge Charles H. Weigle by failing to provide for personal contact visits between Dr. Sacy and his undersigned attorney since sometime around the middle of September 2018, the exact date unknown to undersigned. In this regard, since such date and time, attorney visits have been conducted in a partitioned room with a plate glass divider, which is subject to recording and monitoring. These contact visits are attorney-client privileged and should neither be recorded nor monitored.

(B) Further access is being denied to the courts by the intentional denial of any mail to Dr. Sacy other than open post cards. One of the purposes of the denial of mail to Dr. Sacy is to prevent friends, patients, constituents, and others who are potential witnesses for the defense from getting in contact with Dr. Sacy. This is an effort on the part of the Sheriff and others to interfere with Dr. Sacy in defense of federal charges pending against him.

(C) In an effort to weaken Dr. Sacy physically and emotionally, the Sheriff and others acting in concert with him, have intentionally and deliberately denied him proper food, diet and nutrition. As a result, Dr. Sacy has lost in excess of 30 pounds in weight and is in a debilitated condition. Additionally, the Sheriff and others acting in concert with the Sheriff, including Captain Mary Weaver, Lieutenant Lee, either a correctional officer or a deputy who uses the name of Sister Kay and refuses to give her true name and identity, Sergeant Pete Henderson, who also refuses to give her full name and identity and the cook at the detention center, who refuses to give any name or nickname, systematically harass, threaten and vilify Dr. Sacy in an intentional effort to break him down emotionally. This is all done to prevent and interfere with Dr. Sacy's efforts to defend himself in regard to charges in federal court that are presently pending.

(D) In an effort to prevent Dr. Sacy from defending himself on pending federal charges, the Sheriff and others, acting in concert with him, have in the past and continue to interfere with phone conversations between Dr. Sacy and his undersigned attorney. In this regard, the Sheriff and others refuse to allow Dr. Sacy any private phone conversations, phone services or phone contacts with his attorney with the exception of Pay Tel Communications. The Sheriff's Department has informed undersigned attorney that the only means of communications that will be allowed between himself and Dr. Sacy is exclusively by means of Pay Tel Communications. The quality of this service is totally unacceptable and many times it is out of service or has so much static on the line that it is impossible to carry on a conversation between undersigned attorney and Dr. Sacy. Furthermore, all communications using Pay Tel Communications are recorded and subjected to monitoring and undersigned attorney has reason to believe that every phone call is recorded and monitored.

(E) In an effort to prevent Dr. Sacy from defending himself, he is being targeted and discriminated against and otherwise shown biased and prejudice by a constant and systematic raid and search of his person, cell, cell block, and personal and private legal papers, being privileged communications between Dr. Sacy and undersigned attorney, all for the purpose of harassing him and interfering with any efforts in which he might engage in preparation of trial.

(F) In an effort to interfere with Dr. Sacy's defense, the Sheriff and others have failed and refused to allow Dr. Sacy access to the law library at Butts County Detention Center.

(G) In an effort to interfere with Dr. Sacy's defense, the Sheriff and others refused to provide anyone familiar with the law to assist Dr. Sacy in his efforts to defend himself in regard to the present federal charges pending against him.

(H) This morning, January 18, 2019, the Sheriff and others acting in concert with the Sheriff, have suspended all of Dr. Sacy's phone privileges, including his phone call privileges to undersigned attorney.

(I) The Sheriff and others acting in concert with the Sheriff have committed numerous other acts in furtherance of their conspiracy to deny Dr. Sacy access to the courts on a daily basis from his incarceration on June 27, 2018 through the present time frame.

CLAIM #2: DENIAL OF RIGHTS TO DUE PROCESS IN DISCIPLINARY PROCEEDINGS

From July 27, 2018 through the present time, the Sheriff and others acting in concert with him, have repeatedly punished and disciplined Dr. Sacy without regard to his due process rights as a DETAINEE who has not been convicted of any crime. One such occasion was for a five day (5) period of isolation in solitary confinement during Labor Day Weekend 2018. For numerous lock downs of my client from June 27, 2018 through the present time all without due process and may times to punish others to which my client had no participation with whatsoever. Further, of a one (1) day lock down on or about December 2018. And for continually and repeatedly threatening my client with lock down or solitary confinement for various reasons in an effort to break him down emotionally and mentally to make sure he is unable to prepare a defense for his trial on the pending federal charges against him.

CLAIM #3: SUBJECTION OF DR. SACHY TO CRUEL AND UNUSUAL PUNISHMENT

From July 27, 2018 through the present time, the Sheriff and others acting in concert with him, have repeatedly subjected Dr. Sacy to cruel and unusual punishment by starving him to death. In this regard, the diet and food provisions of Dr. Sacy have been consistently below state and local government requirements, and most meals are absent and missing items either intentionally removed by the cook, with the knowledge and permission of the Sheriff, or either stolen by the trustees, also with the Sheriff's knowledge and permission. As a result of deprivation of essential state and federal mandated food and nutrient requirements, Dr. Sacy has lost thirty or more pounds of weigh and is in a weakened physical condition.

CLAIM #4: FAILURE TO PROVIDE FOR THE MEDICAL NEEDS OF DR. SACHY

From July 27, 2018 through the present, the Sheriff and others acting in concert with him, have denied Dr. Sachy with medical attention he needs. Jail administration, all with the knowledge and permission of the Sheriff, have denied Dr. Sachy of necessary and needed medical service and have told him "unless you have a bone sticking out" you will not see a doctor or other medical provider. The most recent request of Dr. Sachy has been on the week of January 7, 2019 or thereabouts, in which Dr. Sachy made application for an MRI to examine an area of his spine in which he had undergone surgery less than a year ago in approximately February 2018. Due to cruel and usual treatment of Dr. Sachy by detention center officials, his spine surgery did not heal and Dr. Sachy fears that his spinal fusion has separated. Further, in the event Dr. Sachy's spinal is not looked at and treated, he could suffer permanent nerve damage and even suffer paralysis of his spine and body. Another act of mistreatment was that prison officials attempted to force Dr. Sachy to take powerful prescription medication against his will and without informed consent being given, including forcing him to take a powerful prescription laxative. This laxative was given to Dr. Sachy in an effort to further debilitate and weaken him and all for the purpose of interfering with and preventing him from preparing his defense for trial on pending federal charges.

CLAIM #5: DEPRIVATION OF LIFE'S NECESSITIES INCLUDING FOOD, CLOTHING AND MEDICAL CARE.

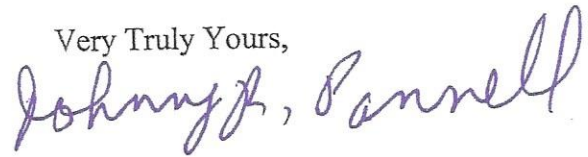
The Sheriff and others acting in concert with the Sheriff, have deprived Dr. Sachy of the minimal standards and measure of life's necessities including food, clothing, and medical care. This has been done maliciously and sadistically for the purpose of causing harm to Dr. Sachy and/or with deliberate indifference to any harm that might be caused by such actions. As aforesaid, the Sheriff acting in concert with others, have deprived Dr. Sachy of the quantity and quality of food necessary to sustain life. In this regard, as aforesaid, the portions of food given to Dr. Sachy does not comply with the minimal quantity of food by state and federal guidelines. Furthermore, Dr. Sachy is being deprived of a balanced diet which does not meet state and federal guidelines. Furthermore, Dr. Sachy is being given rank and spoiled milk, applesauce which he believes is tainted with urine or other foreign substance, and with food refrigerated to the point that it is not capable of being eaten and absorbed by Dr. Sachy. Dr. Sachy has been deprived of sanitary items such as clean clothing and items necessary for shaving, clean towels, and other things necessary for bathing and sanitation. Dr. Sachy, as aforesaid, has been and is being deprived of his basic medical needs and has been told, essentially, this "unless you have a bone sticking out, you will not see a doctor or other medical provider."

CLAIM #6: DENIAL OF EQUAL PROTECTION UNDER THE LAW.

Dr. Sachy is the most mistreated and abused inmate in the Butts County Detention Center. The mistreatment and abuse of Dr. Sachy is so profound that other inmates have taken notice thereof. He is searched when no other inmates are searched. Frequent strip searches and body cavity searches are conducted on him. He is screamed at, hollered at, yelled at by Deputy Sheriffs, prison officials and correctional officers on a regular basis. Deputies and other staff or employees bypass all other inmates and go directly to Dr. Sachy's cell for the purpose of harassing and abusing him. He is prohibited from having the most minor piece of contraband such as a staple in his documents provided to him by his attorney. Further, even though other very minor rules are not enforced against other inmates, such as wearing of an armband, they are enforced to the letter as to Dr. Sachy.

Dr. Sachy reserves the right to notify the county and other liable parties of additional claims at a later date.

Very Truly Yours,



Johnny R. Pannell

JRP/jp

cc: Michael A. O'Quinn, J.D.
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