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J. RON WRIGHT
PAULA RANALLO WILBURN
JUSTIN STOUT
TOM WRIGHT

NOTICE OF CLAIM

January 25, 2021

Muskogee County Board of County Commissioners
400 W. Broadway
Muskogee, OK 74401

State of Oklahoma, ex rel Office of Juvenile Affairs
3812 N Santa Fe Ave.
Oklahoma City, OK 73118

Re: NOTICE OF TORT CLAIM

TO WHOM IT MAY CONCERN:

This constitutes a Notice of Claim submitted pursuant to 51 Okla. Stat. Ann. § 156.

Name of Claimant:

Carrie Olive, as parent of Ethan Cole
Warren, minor child

Address of Claimant:

██████████
Muskogee, OK 74401

Telephone Number of Claimant:

Date of Occurrence Giving Rise to Claim:

██████████
on or about 09-10-2019

Time of Occurrence Giving Rise to Claim:

unknown

Circumstances of Claim:

On or about 09-10-2019, Ethan Warren, minor child, was under the legal custody of the Oklahoma Office of Juvenile Affairs, and within the physical custody of the Muskogee County Regional Juvenile Detention Facility, operated by the Muskogee County Board of County Commissioners.

While there, he was "choke slammed" by a staff member named Moses Gilbert III. While there, he was also fed unclean food that was shoved under a doorway on a wet floor.

*David
2/2/2021*

While there, he was also denied any physical recreation for several weeks.

While there, he was also denied phone calls for numerous days.

Shortly thereafter, Ethan Warren's mother, Carrie Olive, was informed that something improper had occurred regarding her son. She was informed that OJA was conducting an investigation. She hired counsel.

Counsel, Justin Stout, filed Case No. CV-2019-564 on or about 11/20/2019, in an attempt to obtain confidential records related to the investigation of the incidents that occurred so that he could assist Carrie Olive in determining whether or not she (on behalf of her son) had a valid claim to pursue against the County and/or the State of Oklahoma. (Counsel notes that said records are not otherwise obtainable by the claimant without a Court Order) The Confidential records were delivered to the Court on or about 12/31/2019, and counsel was notified shortly thereafter.

From 03/16/2020 through 05/15/2020, all deadlines, statutes of limitation, and other procedures were suspended and/or tolled. Thus, claimant asserts that this Notice of Tort Claim is timely

State Agency (or Agencies) Involved:

Muskogee County Board of County Commissioners
State of Oklahoma, Office of Juvenile Affairs (OJA)

Nature of Injury:

As a result of the treatment mentioned above, Ethan Warren sustained pain and suffering to his neck and head area. He also sustained emotional distress.

Compensation Demanded: \$74,999, plus all costs and attorney fees

Attorney Authorized to Settle Claim:

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Sincerely,



Justin Stout