

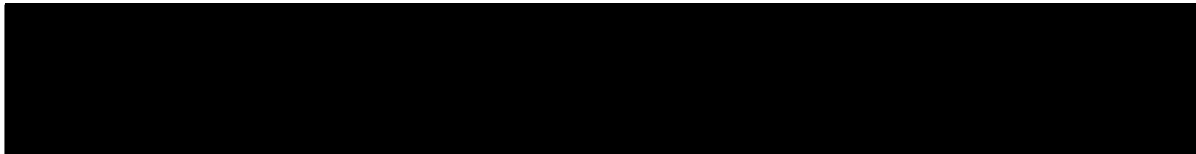
Affidavit of [REDACTED]

Personally appeared before me, the undersigned officer duly authorized by law to administer oaths, [REDACTED], who, after being duly sworn stated under oath as follows:

1. I worked for LK Management, LLC as the property manager of West Place/West Parc Apartments.
2. [REDACTED] was my boss, and to my knowledge, the owner of West Place/West Parc Apartments.
3. As the property manager, I managed and worked full-time at West Place/West Parc Apartments, located at 7200 Six Flags Parkway in Austell, Georgia.
4. I have worked in apartment complex management for 18 years.
5. I stopped working for LK Managements, LLC in September 2017.
6. I know of a shooting at West Place/West Parc Apartments on July 31, 2016 where a man was killed.
7. When I heard about the man that had been shot and killed, my reaction was that it was bound to happen – meaning that I expected someone would get shot and killed at West Place/West Parc Apartments.
8. July 31, 2016 was on a weekend, so the leasing office was closed.
9. [REDACTED] called me and asked me to speak to his lawyer about the case involving the man who was shot and killed on July 31, 2016.
10. West Place/West Parc Apartments was crime infested.
11. West Place/West Parc Apartments was drug infested.
12. I, along with other employees, called the front section of West Place/West Parc Apartments “the cut,” which meant that there was a lot of crime in that part.
13. I routinely saw people selling drugs near the leasing office and in “the cut.” I specifically saw drug-dealers hand drugs to buyers and buyers give money to the drug-dealers.
14. I would tell the drug-dealers that “both of us can’t run a business at the same time” – meaning I can’t run an apartment complex while they were selling drugs at the apartment complex.
15. I saw the drug-dealers with guns.
16. I saw drug baggies on the ground at West Place/West Parc Apartments.

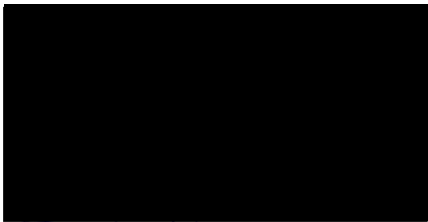
17. [REDACTED] the maintenance supervisor, and I would talk about all the crime, shootings, guns, drugs, issues with lack of security, and other problems at West Place/West Parc Apartments.
18. I saw a lot of people fighting in "the cut."
19. Crime was especially bad on the weekends when the leasing office was closed.
20. Employees, residents, and others told me about shootings at West Place/West Parc Apartments, and I told this to [REDACTED] many times.
21. Employees, residents, and others told me that people would fire guns at the leasing office, and I told this to [REDACTED] many times.
22. I heard gun shots at West Place/West Parc Apartments, and I told this to [REDACTED] many times.
23. Employees, residents, and others told me they heard gun shots at West Place/West Parc Apartments, and I told this to [REDACTED] many times.
24. Employees, residents, and others told me about armed robberies at West Place/West Parc Apartments, and I told this to [REDACTED] many times.
25. Employees, residents, and others told me about break-ins into apartments at West Place/West Parc Apartments.
26. I regularly had to have our maintenance staff fix doors and windows from break-ins.
27. I saw people sell drugs at West Place/West Parc Apartments, and I told this to [REDACTED]
28. Employees, residents, and others told me people sold drugs at West Place/West Parc Apartments, and I told this to [REDACTED] many times.
29. There were a lot of shootings.
30. There were a lot of crimes involving guns.
31. It seemed like there were gunshots almost every day, and I reported this to [REDACTED] many times.
32. The leasing office was constantly vandalized, and I told this to [REDACTED] many times.
33. People would shoot guns at the leasing office; I saw bullet holes; and I told this to [REDACTED] on many occasions.
34. Squatters would live in vacant apartments at West Place/West Parc Apartments.

35. Squatters would bother residents, guests, and employees.
36. Squatters posed a danger and a safety risk to residents, guests, and employees.
37. In 2015 and 2016, Tia Flemings was the property manager.
38. ██████████ told me that she was scared to work at West Place/West Parc Apartments, and I told this to ██████████.
39. West Place/West Parc Apartments was unsafe and dangerous, and I told this to ██████████ many times.
40. Crime made it extremely difficult to safely manage the property, and I told this to ██████████ many times.
41. Sometimes ██████████ told me not to call police when crime happened.
42. ██████████ would not spend money to make the complex look nicer.
43. It was like pulling teeth to get ██████████ to understand that West Place/West Parc Apartments needed more security.
44. Because of the crime at West Place/West Parc Apartments, ██████████ needed to take additional precautions to keep employees, residents, and tenants safe.
45. I constantly asked ██████████ to make West Place/West Parc Apartments safer.
46. I believe West Place Apartments needed to install a gate/gates, hire full-time armed police officers for security, allow us to board-up unused apartments to stop squatters from living inside them, and make the property look nicer.
47. ██████████ was more concerned about making money/not spending money than the safety of employees, residents, and guests.
48. ██████████ refused to install a gate because it would cost too much.



50. ██████████ refused for a very long time to hire police officers to provide security.
51. When ██████████ finally agreed to hire police officers for security, he only hired them to work part-time, because he did not want to pay for full-time.
52. West Place Apartments made enough profit to hire full-time police officers for security.
53. ██████████ would not spend money to buy wood to board-up vacant units to stop squatters from living inside them.

54. Every day I would email a "daily activity report" to [REDACTED] at [REDACTED]@yahoo.com. Many of these emails were about crime, dangerous activity, and lack of security at West Place/West Parc Apartments.
55. I am sure there are emails from me to [REDACTED] telling him about shootings and guns, drugs and drug-dealers, and how the property was dangerous and lacked proper security.
56. There was a woman named [REDACTED] that worked at West Place/West Parc Apartments.
57. I do not know about anyone named [REDACTED] that worked at West Place/West Parc Apartments.
58. [REDACTED] was the property manager at West Place/West Parc Apartments before I got to the complex. I knew [REDACTED] before I started working at the complex.
59. I left LK Management, LLC because [REDACTED] cared more about money and less about the community.
60. I cared more about the safety of residents, guests, and employees at West Place/West Parc Apartment than [REDACTED] did.



Notary Public
My Commission Expires: 03/18/2018

