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April 29, 2019

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Indiana Political Subdivision Risk Management Commission
311 West Washington Street, Suite 300
Indianapolis, IN 46204

Office of the Attorney General
302 W Washington Street
Indianapolis, IN 46204

Indiana State Police
100 North Senate Avenue
Indianapolis, IN 46204

Kosciusko County
100 W Center St
Warsaw, IN 46580

Warsaw City Council and its Members
102 S Buffalo Street
Warsaw, IN 46580

Joe Thallemer
102 S. Buffalo Street
Warsaw, IN 46580

City of Warsaw
102 S Buffalo Street
Warsaw, IN 46580

Re: Chad Zartman

NOTICE OF TORT CLAIM

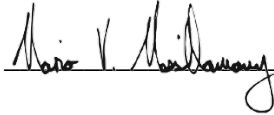
This Notice is being served pursuant to IC § 34-13-3-8 through -10. I represent Chad Zartman. My client resides at 5000 N. 150 W Warsaw, Indiana 46580.

Claimant seeks recovery of damages for injuries suffered when his personal property, specifically two cell phones, were wrongfully seized from him by Indiana State Police officers on or about March 28, 2019. This was a violation of his First Amendment right to freedom of speech, a violation of his Article 1 Section 9 of the Indiana Constitution right to freedom of speech and protection of purely political speech, a violation of his Fourth Amendment and Article 1 Section 11 of the Indiana Constitution rights against unreasonable search and seizure, and constitutes theft and conversion of his personal belongings. Claimant's personal property was taken from him during a Warsaw City Council meeting on March 28, 2019. It wasn't until after his phones were seized that law enforcement officials completed a probable cause affidavit and obtained a search warrant. This search warrant and probable cause affidavit also contained many falsehoods, including referencing a prior search warrant that tracked information from emails sent. Requests to the clerk have been made for copies of this search warrant, and claimant was told that it did not exist. The Indiana State Police acted in bad faith when they seized claimant's property and then drafted a probable cause affidavit and search warrant after the fact.

As a direct and proximate result of the intentional misconduct, bad faith, malice, and false representations of individuals employed by the State of Indiana, my client has sustained damages in an amount that is ongoing.

Persons having knowledge of this occurrence include Joe Thallemer, Ryan Hovarter, Jeff Grose, Dan Spaulding, and other persons not yet identified.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mario V. Massillamany", is written over a horizontal line.

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Attorney for Chad Zartman

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