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July 3, 2015

VIA CERTIFIED MAIL (W/RR) AND FACSIMILE (859-824-5733)

Dry Ridge Housing Authority
300 Meadowview Cir.
Dry Ridge, KY 41035

ATTN: Barbara Owen

RE: Meadowview Circle Apartments

To whom it may concern:

Please be advised that our firm represents Charles Homer, Jamie Jones, Antoinette Homer, Alecea Homer, India Homer, and Kalen Hodges with respect to injuries they have sustained a result of residing at 386 Meadowview Circle, Dry Ridge, Kentucky 41035. We have reason to believe you own and manage this apartment. It has come to our attention that the subject apartment is infested with toxic mold that has caused my clients severe injuries. Further, it appears that additional apartments are so affected and thus this is a systemic breakdown in your duty to make these premises habitable and safe.

Please let this email serve as formal notice that you must preserve, retain, and not destroy all evidence relating to this incident, including but not limited to: correspondence with my clients and tenants, prior complaints, photo and/or video, and any other documents relating to your management of the property.

In addition, please consider this a formal request that a sample be taken and preserved from all affected apartments for future testing.

Failure to preserve this evidence will give rise to a legal presumption that the missing evidence would have been damaging to your case and, in addition, may constitute a Class D Felony in the Commonwealth of Kentucky.

Thank you for your cooperation in this matter.

Best Regards



James Ryan Turner
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CC: City of Dry Ridge
F. 859-824-3598