

**IN THE STATE COURT OF GWINNETT COUNTY  
STATE OF GEORGIA**

VICTORIA S. BOWLES, )  
)  
Plaintiff, )  
) CIVIL ACTION  
vs. )  
) FILE NUMBER: 23-C-04803-S3  
)  
UNIVERSITY OF GEORGIA )  
ATHLETIC ASSOCIATION, INC., )  
a Georgia Nonprofit Corporation; )  
)  
JALEN D. CARTER, individually and )  
as an agent and employee of )  
BREADMAN JALEN, LLC, )  
a Florida Limited Liability Company; )  
)  
BREADMAN JALEN, LLC, a )  
Florida Limited Liability Company; )  
)  
ROBERT W. HUGHES, in his capacity )  
as the Court Appointed Personal )  
Administrator of the Estate of )  
CHANDLER LECROY, deceased; and )  
)  
JOHN DOE Nos. 1-5. )  
)  
Defendants. )  
\_\_\_\_\_ )

**AMENDED COMPLAINT FOR DAMAGES**

Comes now Plaintiff, Victoria S. Bowles, and hereby amends her original Complaint for Damages by deleting in their entirety the Introduction, Counts I-VI, and the Prayer for Relief, and adding an amended Introduction, Counts I-VI and amended Prayer for Relief as follows (*All additions deemed relevant from the original Complaint for Damages are in bold and italicized*):

## INTRODUCTION

This case involves a high speed vehicle crash in Athens, Georgia that occurred early in the morning on January 15, 2023 after the UGA Football National Championship Celebration the prior day. Defendant Jalen Carter, a University of Georgia football player, and Chandler LeCroy (deceased) were driving at extreme speeds, with LeCroy, traveling at least 104.2 mph, while engaged in street racing for 45 seconds or less before the crash (giving the passengers in her vehicle only a brief amount of time to appreciate the high speed and protest).

The crash resulted in the deaths of University of Georgia football player Devin Willock and University of Georgia Athletic Association recruiting analyst Chandler LeCroy (“LeCroy”). Plaintiff Victoria S. Bowles (“Ms. Bowles”), also, *at the time*, a University of Georgia Athletic Association recruiting analyst (since 2019), was a backseat passenger in the large Ford Expedition SUV being driven by LeCroy. The SUV had been rented by Defendant University of Georgia Athletic Association (“UGA Athletic Association” or “Association”)<sup>1</sup> and had been entrusted to LeCroy as a permissive user.

As a result of the crash, Ms. Bowles sustained multiple debilitating injuries, including:

- Three lumbar “burst fractures,” with a spinal cord injury sufficient to cause leakage of cerebrospinal fluid;
- Five other fractured vertebrae;
- Approximately ten fractured ribs;
- A fractured clavicle;
- A fractured sacrum;
- Fractured and cracked teeth;
- *Lacerations on both kidneys;*

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<sup>1</sup> The University of Georgia Athletic Association is a separate distinct legal entity from the University of Georgia (“UGA”).

- A liver laceration;
- A punctured and collapsed lung;
- Intra-abdominal hemorrhaging;
- ***Initial low blood pressure of 66/40;***
- Facial lacerations and injury to her jaw;
- A closed head injury, and severe eye pain ***which, according to medical literature, can involve neurological damage caused by a build-up of spinal fluid as the result of arachnoiditis;***
- Damage to her spinal cord resulting in inflammation of the arachnoid, one of the membranes that surrounds the nerves of the spinal cord, with symptoms including burning sensations and severe pain in her extremities, and foot drop syndrome; and
- Developed “significant arachnoiditis” according to her neurosurgeon-normally a permanent neurological condition with no cure, often progressing to permanent paralysis.

**Permissive Use-Drinking & Driving By UGA Association Coaches & Staff  
In Association Vehicles Was Common.**

*The UGA Athletic Association denies that Ms. LeCroy had permission to drive the subject SUV (in its words) “to downtown Athens for a night of drinking and partying.” While this language is inflammatory as to what occurred the night of the crash, text messages (detailed and displayed in this Amended Complaint; see ¶¶ 35-41) provide evidence that football staffers, with the Association’s knowledge, regularly drove recruits and their guests after consuming alcohol at Athens’ restaurants and bars. Text messages show that on occasion supervisors and coaches, in effect, encouraged recruiting staff to drink alcohol with football prospects’ families-well aware that staffers would leave the events after consuming alcohol.*

*Association coaches and staff regularly drank alcohol at UGA football Coach Kirby Smart’s residence during recruiting events, and then, in Association SUVs, returned recruits’ families and guests back to their lodging. The Association and UGA coaches were well aware that*

*the recruits' families and guests arrived and departed from Association sponsored events, which involved alcohol, in Association SUVs.*

*A December 14, 2019 text sent to thirteen staffers, by Marshall Malchow, at the time the UGA football program Director of Player Personnel and one level below Coach Smart on the Association's organizational chart, states (after prior texts establishing a recruiting event at Coach Smart's residence):*

*Hey guys... if you are driving you can have fun at Coach Smarts but if you are driving a recruit make sure you don't get drunk. It will be a bad look if we have people who are supposed to be driving recruits getting lit.*

*A January 2020 text from an Association staffer to numerous Association staff, involving another recruiting event at Coach Smart's residence (with the text chain confirming numerous Association SUVs were involved) states: "Godwin, the guy who says not 'too [sic] have too good a time at Kirby's house' slamming beers in the group thread. Cruitin."*

*A February 22, 2022 text message from Association staffer Logen Reed provides evidence that Association staffers regularly drove recruits' families to local Athens bars (almost always in Association SUVs) and drank alcohol with the families (and obviously returned in the SUVs). Ms. Reed states: "Well James told Rhonda [Rhonda Kilpatrick, Associate Athletic Director – Academics and Eligibility] that we turn five bar [5-Bar, an Athens restaurant and bar] into a bar with recruits families and don't leave."*

*A June 8, 2021 text message from Association staffer Matt Godwin states: "Cochran told me I gotta get Mitch Zoloty f\*\*\*\*d up tonight so gonna head downtown for a celebratory beer if anyone would like to join." (Expletive deleted). (Zoloty was a redshirt junior offensive lineman with the Butler University football team at the time).*

**Permissive Use-Personal Use.**

***Contrary to the Association’s public statements, Association staffers also had permission to use Association SUVs for non-recruiting personal use. On the evening of the Championship Celebration, LeCroy told Ms. Bowles that she (LeCroy) had “permission” to keep the SUV “until tomorrow.” Ms. Bowles, prior to the night of the crash, specifically inquired with her superior as to whether Association recruiting analysts could keep SUVs overnight, and was told it was permissible.***

The UGA Athletic Association issued a public statement following the crash contending that “rental vehicles were to be turned in at the immediate conclusion of recruiting duties.” Another public statement following the crash stated that rental vehicles were available to be used by staff members during "recruiting activities only."

***Eleven text messages detailed and displayed in this Amended Complaint*** (See ¶¶ 51-63) from Association recruiting staff supervisors to LeCroy, Ms. Bowles and other staff members show the Association’s statements are false.<sup>2</sup> Recruiting staff were regularly informed they could leave their personal vehicles overnight at the *Butts-Mehre* football facility and permissively use Association rental vehicles through a specified cut-off date and time (*often 11:00 a.m.*), which were unrelated to their assigned recruiting activity duties.

***Confronted with some of the above text messages, the Association changed positions in its Answer to the original Complaint to state an SUV could “occasionally” be driven home “when recruiting activities required it, for example, an early morning start for the next day’s recruiting activities.” This statement is false, because recruiting analysts were permitted to keep the rental***

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<sup>2</sup> It is Plaintiff’s understanding that the UGA Athletic Association claims that it has no actual employees. Assuming this to be true, Plaintiff refers to persons or agents acting on behalf of the Association as “Association staff” and or “staff members” in this Complaint without taking any legal position as to their actual legal status.

*vehicles even when no recruiting activities were occurring the following day.*

Not only do text communications prior to the crash show personal use of vehicles was permitted- presumed personal use of the SUV provided to LeCroy was authorized by UGA Assistant Football Coach Chidera Uzo-Diribe on the evening of the Championship Celebration, just hours before the crash.

Coach Uzo-Diribe, while at *Sakura* restaurant in Athens with UGA football recruits/prospects and their guests during an unofficial recruiting visit, asked Ms. Bowles to obtain \$1,000.00 in cash from an ATM. (The specific details, with documentation, follow below; See ¶¶ 65-78). Ms. Bowles and LeCroy left in LeCroy's UGA Athletic Association rented SUV to obtain the cash, after an effort at a next-door convenience store failed.

Since the prospects and prospects' guests dining at *Sakura* were on unofficial recruiting visits to UGA, the use of the SUV to obtain the requested cash was *presumably* not for "recruiting activities," but was for personal use-a personal favor to Coach Uzo-Diribe. (*Football program coaches and staff cannot, under NCAA rules and regulations, pay for any expenses of recruits or their guests', including, but not limited to, meals, drinks, lodging, etc., during unofficial visits*).

*Ms. Bowles was aware from her own observations and from prior communications from her superiors of UGA football coaches' use of cash in recruiting activities involving unofficial visits prior to that evening-and of a written request prior to that evening from a recruiting supervisor directing staff to "address with every single coach" the need "to get coaches to pay for unofficial visitors."*

*However, Ms. Bowles does not know the actual purpose of the cash requested at Sakura by Coach Uzo-Diribe, but gives Coach Uzo-Diribe the benefit of the doubt of any impropriety. (Only the Association, and not Ms. Bowles prior to the filing of this Amended Complaint, has raised the*

*issue of NCAA recruiting violations).*

*The Association's public statements (as detailed in ¶¶ 79(d) & 79(h) below), before and after the Association's legal pleading (its Answer) to this lawsuit, concerning the purpose of Coach Uzo-Diribe's cash request at Sakura, contradict its Answer that the cash was for the coach's personal use.*

*The Association's public statements, contradicting its legal pleading, show the Association seeks to have it both ways relating to the purpose of the \$1,000.00 in cash - one for legal purposes (not for personal use); another for public consumption (for personal use, but not for an unofficial recruiting visit purpose).*

*Emails sent to Ms. Bowles' through her counsel immediately after the original Complaint was filed, from William Lawler, UGA's Deputy Athletic Director for Legal and Regulatory Affairs/Assistant General Counsel for Athletics, who oversees the Athletics Compliance Office, also contradict the Association's public statements on the Sakura incident, and demonstrate that UGA and the Association have existing concerns that the cash requested and obtained by Coach Uzo-Diribe was to be used for an impermissible purpose under NCAA rules. (See ¶¶ (79(i)-79(k)). (Mr. Lawler is not admitted to practice law in the State of Georgia, and sent said communications in his capacity as Deputy Athletic Director).*

*On July 15, 2023, Mr. Lawler sent another email directed to Ms. Bowles' through her attorneys stating, in part: "the Complaint [lawsuit] sets out factual assertions that could give rise to an NCAA inquiry about matters of which she might have personal knowledge . . .". Previously, on July 13, 2023 (the day the lawsuit became public), Mr. Lawler emailed Ms. Bowles' attorneys stating: "We have received information that Ms. Tory Bowles may have been involved in or have knowledge of possible NCAA rules violations . . . While it is unclear whether any NCAA*

*violations occurred, it is imperative that we speak with Ms. Bowles no later than 5 p.m. tomorrow, July 14, 2023.” (Less than a month later, Ms. Bowles was terminated).*

*If Coach Uzo-Diribe’s use of the \$1,000.00 in cash was, for example, for personal purchases, Ms. Bowles’ use of the Association SUV to obtain the cash would have been for her personal use – as a personal favor to Coach Uzo-Diribe-establishing that recruiting analysts were directed and permitted by the coaching staff to use Association vehicles for personal use.*

*Even if Coach Uzo-Diribe intended to or did use the \$1,000.00 in cash to commit an NCAA recruiting violation, Ms. Bowles’ use of the Association SUV to obtain the cash for Coach Uzo-Diribe for a purpose unknown to Ms. Bowles was, likewise, for personal use – as her use of the SUV was a personal favor to Coach Uzo-Diribe - also establishing that recruiting analysts were directed and permitted by the coaching staff to use Association vehicles for personal use.*

In summary, LeCroy had permission from the UGA Athletic Association to drive the vehicle at the time of the crash, *with no stated limitations, and there were no enforced prohibitions (if any existed, and unknown to Ms. Bowles) against staff driving the SUVs after consuming alcohol.* Moreover, for insurance purposes, a “permissive use of a vehicle cannot reasonably relate to the particular manner of its operation.” *Gaither v. State Farm Fire & Cas. Co.*, 229 Ga. App. 330 (1997); *Strickland v. Ga. Casualty & Sur. Co.*, 224 Ga. 487 (1968); *Great Am. Alliance Ins. Co. v. Anderson*, 847 F3d. 1327 (2017). In other words, as LeCroy had permission to drive and use the vehicle in general, the purpose for which the vehicle was driven, and the manner in which it was driven (even though she may have been legally intoxicated, as was the situation in *Great Am. Alliance Ins. Co.*) is not relevant under Georgia law to preclude or bar the Association’s insurers’ liability coverage.



### Negligent Entrustment.

Were it not for the UGA Athletic Association’s negligent entrustment of the SUV to LeCroy on January 15, 2023, the crash would have been avoided. The Association was well aware that LeCroy’s primary job duty as an Association recruiting analyst required her to regularly drive UGA football recruits and their families around Athens - *a position for which LeCroy was not reasonably suited.*

Despite the Association’s public denials since the crash, it was fully aware, *based upon a public statement (see ¶ 174)*, that LeCroy had at least four speeding tickets, which included two “super speeder” violations under Georgia law. LeCroy’s immediate supervisor, Logen Reed, was personally aware of LeCroy’s most recent “super speeder” ticket that was issued on October 30, 2022 while she was returning to Athens following the Georgia-Florida football game. Ms. Reed was present in LeCroy’s vehicle at the time.

Bryant Gantt (“Gantt”), UGA’s liaison between the UGA football program, law enforcement, and the court system – who was paid \$209,914.61 in 2022 for job duties that directly involved getting players out of legal trouble - subsequently attempted, in person, to get a county court clerk to reduce LeCroy’s super speeder charge in November of 2022. Between 2016 and 2023 Gantt was personally involved in at least 82 separate legal matters involving players.

The UGA Athletic Association issued a public statement that Gantt’s involvement in the LeCroy ticket “was purely in his personal capacity as a favor to a friend” in an attempt to distance itself from his actions. Gantt *reported directly to Coach Smart, as shown on the Association’s organizational chart.*

*Prior to the day of the Championship Celebration*, the UGA Athletic Association was aware, based upon its own public statement, of LeCroy’s previous speeding violations, including

“super speeder” violations, and, therefore, that LeCroy was a habitually reckless driver. Gantt’s admitted attempt (with LeCroy’s knowledge) to reduce her October 2022 “super speeder” violation gave LeCroy an understanding that the Association would continue to intervene on her behalf in relation to future speeding violations, thus encouraging and facilitating her high speed driving and reckless conduct.

*Prior to the day of the Championship Celebration, the UGA Athletic Association would have reasonably concluded that LeCroy regularly drove at extreme speeds when law enforcement was not present. The Association’s negligent entrustment of the large rental SUV to LeCroy, with knowledge that she was a reckless and habitual speeder, concurs with LeCroy’s primary negligence-traveling 104.2 mph. While LeCroy may have been legally intoxicated, the proximate cause of the crash was street racing and extreme speed.*

*Ms. Bowles has no knowledge that defendant Carter had been drinking that evening, yet he jointly engaged in a street race with LeCroy on Barnett Shoals Road causing the crash.*

*Prior to the day of the Championship Celebration, the UGA Athletic Association had at least one other reason to be aware that LeCroy was a habitually reckless driver. In the Spring of 2022, LeCroy, driving an Association golf cart (a street legal vehicle subject to UGA’s vehicle operation policies), in an Association “scavenger hunt” speed contest/race with recruits and guests as passengers, negligently crashed into another staffer’s Association golf cart. The collision caused, upon information and belief, LeCroy and a football recruit’s mother to be thrown out of one or both of the carts, and both carts were extensively damaged. Gantt was involved in the investigation.*

### Events Leading to the Crash.

Athens-Clarke County video shows that the narrative conveyed to the public of LeCroy driving aggressively and at excessive speeds in the downtown Athens area before the crash is incorrect. Outside of downtown Athens, and before the crash on Barnett Shoals Road, LeCroy, *without Ms. Bowles' awareness*, did enter a short *"left turn only"* lane (in her direction). *As video shows, LeCroy then immediately briefly entered an on-coming lane of travel, largely an on-coming "left turn only" lane, for about five seconds-all occurring without any approaching vehicles. (Ms. Bowles has no knowledge, and there is no other evidence of LeCroy or Defendant Carter afterwards driving in an on-coming lane of travel before the crash).* She did, *video shows*, subsequently drive at an unsafe speed while following Defendant Carter *on a largely straight roadway* just outside of downtown-although approximately 22 mph slower than him.

Reports of Defendant Carter's aggressive and high speed driving are accurate. He was driving a Jeep Cherokee *Trackhawk*, a vehicle recognized as a favorite of street racers, and capable of speeds up to 180 mph. (The exact streets traveled, turns made, driving maneuvers, distances, and speeds detected, *with video evidence addressed*, are detailed in this Amended Complaint; see ¶¶ 112-154).

LeCroy, just four seconds before impact according to the SUV's airbag control module, was traveling 104.2 mph. Defendant Carter's admissions, in effect, substantiate, along with video and physical evidence, that he was street racing with LeCroy on Barnett Shoals Road. In a recorded interview with law enforcement, he stated that near the curve of the crash he slowed his vehicle while beside the LeCroy vehicle, and she passed him. *(There is no evidence, contrary to the Association's contention stated in its Answer, that LeCroy "tried to overtake Defendant Carter's vehicle" during the street race on Barnett Shoals Road-he was always behind her or beside her).*

Defendant Carter admitted he, while traveling behind LeCroy, observed her vehicle go off the road and strike a pole, saw the pole falling, and admitted that a wire from the pole came down on his vehicle—a physical impossibility without him traveling a similar speed.

Defendant Carter's statements to law enforcement following the crash: "I was going an average speed" and "I wasn't going fast," must be taken in the context of his normal driving behavior, as addressed in this Amended Complaint.

Both LeCroy's Estate and Defendant Carter are liable to Ms. Bowles for engaging in a grossly negligent joint enterprise-tandem driving/street racing. See, *Price v. Thapa*, 323 Ga. App. 638 (2013). ***Therefore, these two defendants, acting in concert, do not have the benefit of Georgia's statute allowing jurors to apportion their percentages of negligence, but are jointly and severally liable for Ms. Bowles' damages. In other words, each defendant is equally liable for the negligence of the other. See, FDIC v. Loudermilk, 305 Ga. 558 (2019).***

Defendant Carter illegally left the scene without speaking with law enforcement ***or rendering aid***. He did initially stop at the scene and could see "smoke and the car." (The SUV was crushed beyond recognition). Despite LeCroy's passenger, Warren McClendon, stating to him that he could not locate Devin Willock, Defendant Carter left the scene after less than 10 minutes when another UGA football player at the scene yelled at him: "Yo...hey, JC...you might want to go ahead and go get the f\*\*\* on yo...." As Defendant Carter was aware at the time, he was jointly responsible for the crash, ***regardless of his SUV's lack of physical impact with the LeCroy SUV***, and had a legal duty to remain on the scene. Instead, in part obviously fearful of bad publicity and the effect on his NFL draft status, he hoped not to be questioned or take any responsibility for his actions.

Ms. Bowles was unaware when entering the UGA Athletic Association rented SUV that LeCroy may have been legally intoxicated. Ms. Bowles, likewise, had no indication or knowledge

(as no reasonable person would) that LeCroy and Defendant Carter would engage in street racing at speeds exceeding 100 mph.

During the 45 seconds or less during which LeCroy and Defendant Carter began street racing on Barnett Shoals Road, Ms. Bowles *at some point realized that LeCroy was going too fast. Ms. Bowles attempted to lean over to look at the speedometer from the back seat of the large SUV, but she could not see the speedometer. At this point, becoming even more concerned about speed, Ms. Bowles verbally protested-but LeCroy ignored her, and continued racing Defendant Carter at speeds in excess of 100 mph until the crash occurred-all of this happening in a few seconds.*

In summary, Ms. Bowles never assumed the specific risk of LeCroy's high speed driving in excess of 100 mph, or the risk of LeCroy's and Defendant Carter's street racing, when she entered the rental SUV as a passenger.

#### **PARTIES**

1. Defendant University of Georgia Athletic Association, Inc. ("UGA Athletic Association" or "Association") is a Georgia Nonprofit Corporation that has previously been served with a copy of Plaintiff's Complaint and Summons and has appeared in this action through counsel.

2. Defendant UGA Athletic Association is subject to the jurisdiction and venue of this Court.

3. Defendant UGA Athletic Association is a nonprofit entity as defined by Georgia law, and it is not an agency or entity of the State of Georgia. See O.C.G.A. §§ 14-3-101, 14-3-140, 14-3-301 et seq.; 20-3-78, 20-3-79 & 20-3-80.

4. Defendant UGA Athletic Association has waived its qualified charitable immunity by the purchase of insurance covering its negligent conduct, and to the extent of income from non-charitable sources, including, but not limited to, the face value of athletic event tickets (totaling \$37,192,353 in 2022) and rights/licensing income (totaling \$77,447,079 in 2022).

5. Defendant UGA Athletic Association has further waived its qualified charitable immunity as a result of its negligent entrustment of the rented SUV to LeCroy. See, *YMCA of Metropolitan Atlanta, Inc. v. Bailey*, 107 Ga. App. 417 (1963).

6. Defendant Robert W. Hughes, named only in his representative capacity as the Court-Appointed Personal Administrator of the Estate of Chandler LeCroy, has previously been served with a copy of Plaintiff's Complaint and Summons and has appeared in this action through counsel.

7. Robert W. Hughes, as the Court-Appointed Personal Administrator of the Estate of Chandler LeCroy, is subject to the jurisdiction and venue of this Court.

8. Defendant Jalen D. Carter, individually (hereinafter "Defendant Carter"), and as an agent and employee of Defendant Breadman Jalen, LLC, has previously been served with a copy of Plaintiff's Complaint and Summons and has appeared in this action through counsel.

9. Defendant Jalen Carter is subject to the jurisdiction and venue of this Court.

10. Defendant Breadman Jalen, LLC (hereinafter "Defendant Breadman LLC") a Florida Limited Liability Company, has previously been served with a copy of Plaintiff's Complaint and Summons and has appeared in this action through counsel.

11. Defendant Breadman LLC is subject to the jurisdiction and venue of this Court.

12. The State Court of Gwinnett County has original jurisdiction over this matter because one of the named defendants is a resident and citizen of Gwinnett County, State of Georgia, and this action is not subject to federal jurisdiction or removal to federal court under the provisions of 28 U.S.C. § 1332 because the claims asserted in this action relate to various torts committed in the State of Georgia and one or more of the parties in interest properly joined and served as a defendant in this action are citizens of Georgia, the state in which the action has been brought. See, 28 U.S.C. § 1441(b).

## FACTS GIVING RISE TO PLAINTIFF'S CLAIMS

13. Plaintiff hereby incorporates and adopts by reference the previous paragraphs of this Amended Complaint as if fully and completely set forth herein.

14. On January 14, 2023, the University of Georgia (“hereinafter “UGA”) and/or the UGA Athletic Association held a parade and *Sanford Stadium* event (hereinafter “Championship Celebration” or “Celebration”), in Athens, Georgia to celebrate UGA winning the 2022 College Football Playoff National Championship.

15. As part of the Championship Celebration activities, Defendant UGA Athletic Association also hosted a number of football recruits and their families on unofficial visits to Athens and the UGA campus.

16. The football recruits and their families taking part in the unofficial visits in connection with the Championship Celebration were hosted by UGA football coaches and UGA Athletic Association staff members, including recruiting analysts, during their visits.<sup>3</sup>

17. On January 14, 2023 and January 15, 2023, LeCroy was a UGA Athletic Association recruiting analyst who was assigned to host a football recruit from Texas and his family on an unofficial visit in relation to various events occurring as part of the Championship Celebration.

18. On January 14, 2023 and January 15, 2023, Plaintiff Victoria S. Bowles (“Ms. Bowles”) was a UGA Athletic Association recruiting analyst who was assigned to host a football recruit from Georgia on an unofficial visit in relation to various events occurring as part of the Championship Celebration.

19. Following the parade and events at *Sanford Stadium* conducted in connection with the

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<sup>3</sup> It is Plaintiff’s understanding that the UGA Athletic Association claims that it has no actual employees. Assuming this to be true, Plaintiff refers to persons or agents acting on behalf of the Association as “Association staff” and or “staff members” in this Complaint without taking any legal position as to their actual legal status.

Championship Celebration, Ms. Bowles and LeCroy were each issued and provided with separate rental SUVs by the UGA Athletic Association to use over the course of the Championship Celebration weekend.

20. On the day of the Championship Celebration, at UGA football headquarters, *Butts-Mehre*, Assistant Director of Football Operations/Recruiting, Anna Courson, gave LeCroy and Ms. Bowles each authority to use UGA Athletic Association rented SUVs, which they picked up in the *Bones* player cafeteria parking lot.

21. Plaintiff Victoria Bowles was assigned a large red SUV by the UGA Athletic Association for her use over the course of the Championship Celebration weekend.

***22. LeCroy was assigned a large black SUV by the UGA Athletic Association for her use over the course of the Championship Celebration weekend.***

23. LeCroy expressly told Ms. Bowles on the evening of the Championship Celebration that she (LeCroy) had permission to keep the vehicle “until tomorrow.”

24. Plaintiff had, prior to the night of the crash, specifically inquired with a supervisor as to whether Athletic Association recruiting analysts could keep UGA Athletic Association rental SUVs overnight, and was told that it was permissible for recruiting analysts to do so.

25. At the time of the crash, LeCroy was operating the subject rental SUV with the permission of the UGA Athletic Association.

26. Neither the UGA Athletic Association nor LeCroy’s supervisors placed any limits or restrictions on her use of the assigned SUV for the day of the Championship Celebration or the morning of January 15, 2023.

Standard Association Procedures & Instructions When Assigning SUVs.

27. The UGA Athletic Association regularly rents a fleet of large SUVs for use in connection



with its recruiting activities that occur at different times throughout the year.

28. The fleet of large SUVs rented by the UGA Athletic Association for use in connection with its recruiting activities are assigned by Athletic Association staff members to coaches, UGA Athletic Association staff members, and UGA Athletic Association recruiting analysts for use, including over the course of a weekend.

29. SUV assignments are normally made via text messages, and keys to the rental vehicles are picked up from the desk of a UGA Athletic Association staff member.

30. Instructions relating to when and where to return the rental vehicles are also normally issued via text messages sent by UGA Athletic Association superiors to staff prior to the end of a recruiting weekend or event.

31. UGA Athletic Association recruiting analysts normally and customarily retained possession and use of their assigned rental SUVs for the duration of a recruiting event or weekend and were only required to return their rental SUVs by a deadline established in a text message sent to them by UGA Athletic Association supervisors and staff, *typically at 11:00 a.m. on Sundays, but specific times were not always stated.*

32. Due to the nature of recruiting visits, UGA Athletic Association recruiting analysts were often on call during the entire time-period that they were hosting a recruit or a recruit's family until the time that a recruit or his family ended their visit and left the campus to return home.

33. UGA Athletic Association recruiting analysts were commonly instructed that they could take their assigned rental SUV's home overnight, and leave their personal vehicles parked at the UGA Athletic Association facilities on campus.

34. Ms. Bowles had previously left her personal vehicle at the football facility overnight on multiple occasions *and driven home in an Association SUV.*

*35. Prior to the day of the Championship Celebration, football program coaches and staff, with the Association's knowledge, regularly drove Association SUVs after drinking alcohol, including at Association sponsored events, as well as Athens' restaurants and bars, and there were no enforced prohibitions (if any, and unknown to Ms. Bowles) against driving the SUVs (or staffer's own personal vehicles) with passengers after consuming alcohol.*

Permissive Use-UGA Association Coaches & Staffers Regularly Drank Alcohol & Drove With Recruits & Recruits' Families & Guests.

*36. Prior to the day of the Championship Celebration, Association coaches and staff regularly drank alcohol at Coach Kirby Smart's residence during recruiting events, and then, in Association SUVs, returned recruits' families and guests back to their lodging. The Association and UGA coaches were well aware that the recruits' families and guests arrived and departed in the SUVs.*

*37. A December 14, 2019 text sent to thirteen staffers by Marshall Malchow, at the time football program Director of Player Personnel, and one level below Coach Smart on the Association's organizational chart, states (after prior texts establishing a recruiting event at Coach Smart's residence):*

*Hey guys... if you are driving you can have fun at Coach Smarts but if you are driving a recruit make sure you don't get drunk. It will be a bad look if we have people who are supposed to be driving recruits getting lit.*

Marshall Malchow

Hey guys... if you are driving you can have fun at Coach Smarts but if you are driving a recruit make sure you don't get drunk. It will be a bad look if we have people who are supposed to be driving recruits getting lit

Derron [REDACTED]

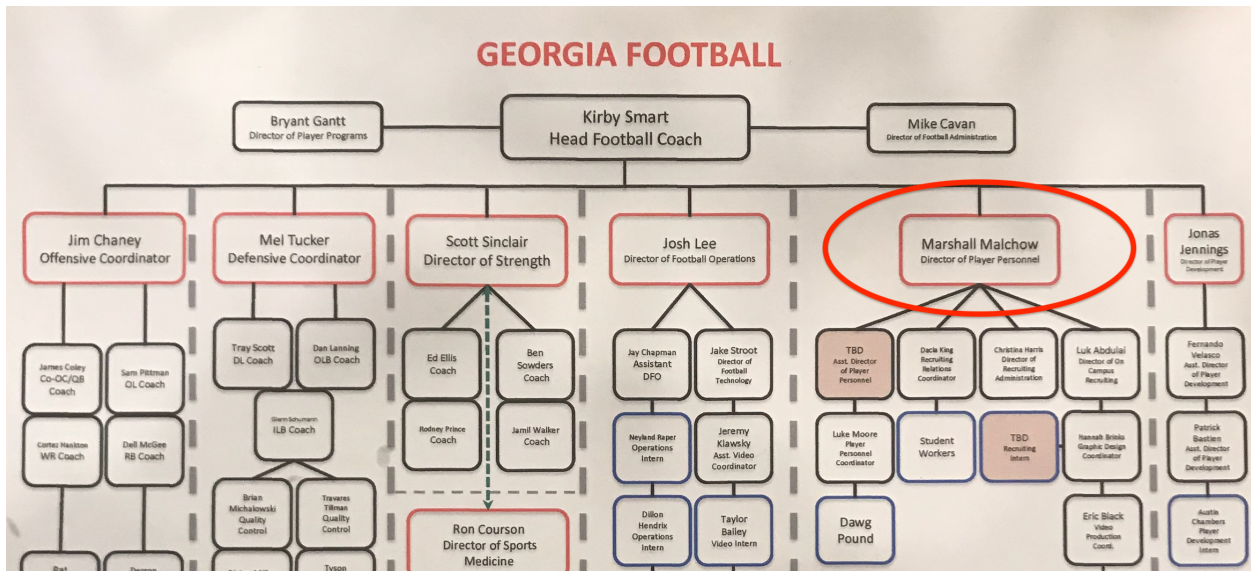


Redacted Gif

Matt Godwin

Let's go ahead and line up some escalades in the drive way

***Exhibit A-1, December 14, 2019 Text Message from Marshall Malchow to Other Football Program Staffers.***



***Exhibit A-2, UGA Football Organizational Chart-Marshall Malchow.***

38. A January 25, 2020 text from an Association staffer to numerous Association staff,

*involving another recruiting event at Coach Smart’s residence (with the text chain confirming numerous Association SUVs were involved) states: “Godwin, the guy who says not ‘too [sic] have too good a time at Kirby’s house’ slamming beers in the group thread. Cruitin.” (Staffer Matt Godwin is displayed in the text chain in the basement of Coach Smart’s residence holding a beer-stating: “One down the hatch”).*

Matt Godwin



Matt Godwin

One down the hatch

*Exhibit A-3, January 25, 2020 Text Message from Matt Godwin to Other Football Program Staffers.*

Greg [REDACTED]

Godwin, the guy who says not "too have too good a time at Kirby's house." slamming beers in the group thread. 'Cruitin

Adam [REDACTED]

Emphasized "Godwin, the guy who says not "too have too good a time at Kirby's house." slamming beers in the group thread. 'Cruitin "

*Exhibit A-4, January 25, 2020 Text Message from a UGA Football Staffer to Other Football Program Staffers.*

Derron [REDACTED]

Can I get #6?

Adam [REDACTED]

As long as Hartley doesn't sing again!!

Matt Godwin

I guess I'd better start drinking

Montgomery [REDACTED]

Liquid courage

Ryan [REDACTED]

We need someone to drive Keanu's dad to his car

Adam [REDACTED]

Need car 3

**Exhibit A-5, January 25, 2020 Additional Text Messages Exchanged in Same Thread**

**39. Prior to the Championship Celebration, text messages show that on occasion supervisors and coaches, in effect, encouraged recruiting staff to drink alcohol with football prospects' families-well aware that staffers would leave the events after consuming alcohol.**

**40. A June 8, 2021 text message from Association staffer Matt Godwin states: "Cochran told me I gotta get Mitch Zoloty f\*\*\*\*d up tonight so gonna head downtown for a celebratory beer if anyone would like to join." (Expletive deleted). (Zoloty was a redshirt junior offensive lineman with the Butler University football team at the time of the text).**

6/8/21, 8:04 PM

Matt Godwin

Cochran told me I gotta get Mitch Zoloty f\*\*\*\*ed up tonight so gonna head downtown for a celebratory beer if anyone would like to join

**Exhibit A-6, June 8, 2021 Text Message from Matt Godwin to Other Football Program Staffers.**

**41. A February 22, 2022 text message from Association staffer Logen Reed provides evidence that Association staffers drove recruits' families to local Athens restaurants and bars (almost always in Association SUVs) and drank alcohol with the families (and obviously left in the SUVs): Ms. Reed states: "Well James told Rhonda [Rhonda Kilpatrick, Associate Athletic Director – Academics and Eligibility] that we turn five bar [5-Bar, an Athens restaurant and bar] into a bar with recruits families and don't leave."**

Logen Reed

Well James told Rhonda that we turn five bar into a bar with recruits families and don't leave 😞

Angela Kirkpatrick

HUHHHH

Logen Reed

Yeah hate that for us

***Exhibit A-7, February 2, 2022 Text Message From Logen Reed to Other Football Program Staffers.***

**Permissive Use-Personal Use.**

42. The UGA Athletic Association issued a public statement following the crash stating that rental vehicles were available to be used by Association staff members during "recruiting activities only."

43. The UGA Athletic Association issued another public statement following the crash stating: "Policies and expectations that were well understood by athletics staff dictated that such rental vehicles were to be turned in at the *immediate conclusion of recruiting duties.*" (Emphasis added).

44. Ms. Bowles was never informed by UGA Athletic Association supervisors/staff that vehicles rented by the UGA Athletic Association had to be turned in at "the immediate conclusion of recruiting duties" or could only be used for "recruiting activities."

45. Ms. Bowles, as well as LeCroy and other UGA Athletic Association staff, were allowed on numerous occasions prior to the subject crash to permissively use the UGA Athletic Association rental vehicles for personal use during down time between scheduled recruiting activities, as well as take the SUV's home overnight after the conclusion of their recruiting activities.

46. Ms. Bowles is aware of other occasions prior to the subject crash where staff members used UGA Athletic Association vehicles for personal use.

47. Neither the UGA Athletic Association nor LeCroy's supervisors placed any limits or restrictions on the use of LeCroy's assigned SUV during the day of the Championship Celebration or the morning of January 15, 2023.

48. At the time of the crash, LeCroy was operating the subject rental SUV with the permission of the UGA Athletic Association.

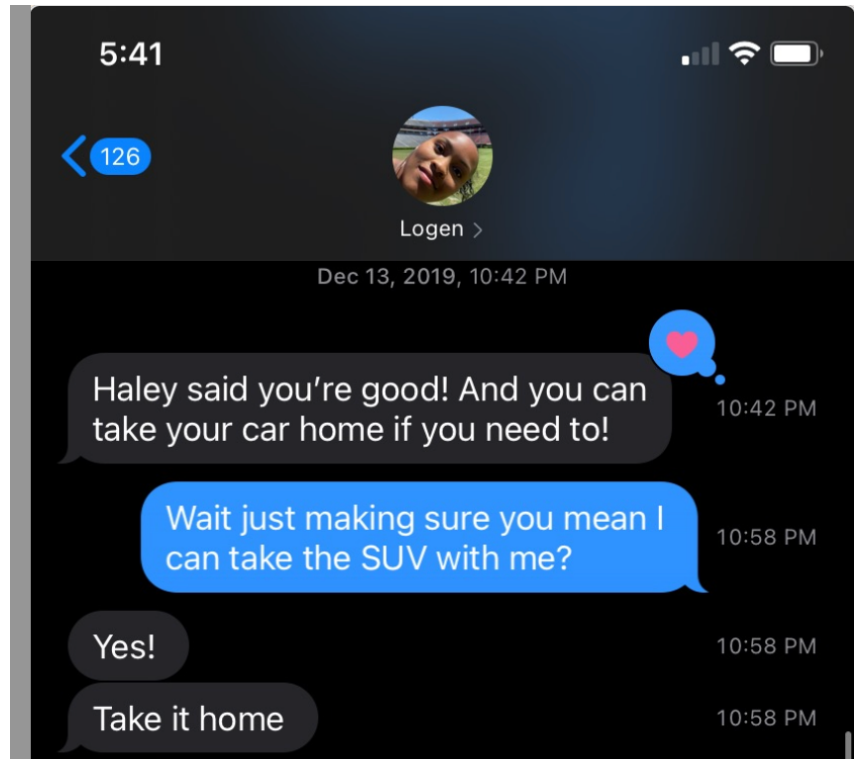
Prior Instances of SUV Personal Use Allowed By The Association.

49. *Before and during the Championship Celebration weekend*, UGA Athletic Association recruiting analysts were commonly instructed that they could take their assigned rental SUV's home overnight, and were allowed to leave their personal vehicles parked at the UGA Athletic Association facilities on campus.

50. True and accurate copies of some of the actual text messages sent to Ms. Bowles and other Athletic Association staff members by UGA Athletic Association supervisors confirming that it was permissible for UGA recruiting analysts to keep rental SUVs overnight, while leaving their personal vehicles at the football facility, are set forth in ¶¶ 51-63 below.

51. On Friday, December 13, 2019, Logen Reed, Ms. Bowles' immediate supervisor, sent Ms. Bowles a text message that stated: "Haley said you're good! And you can take your car home if you need to." Ms. Bowles responded: "Wait just making sure you mean I can take the SUV with Me." Ms. Reed responded: "Yes! Take it home."

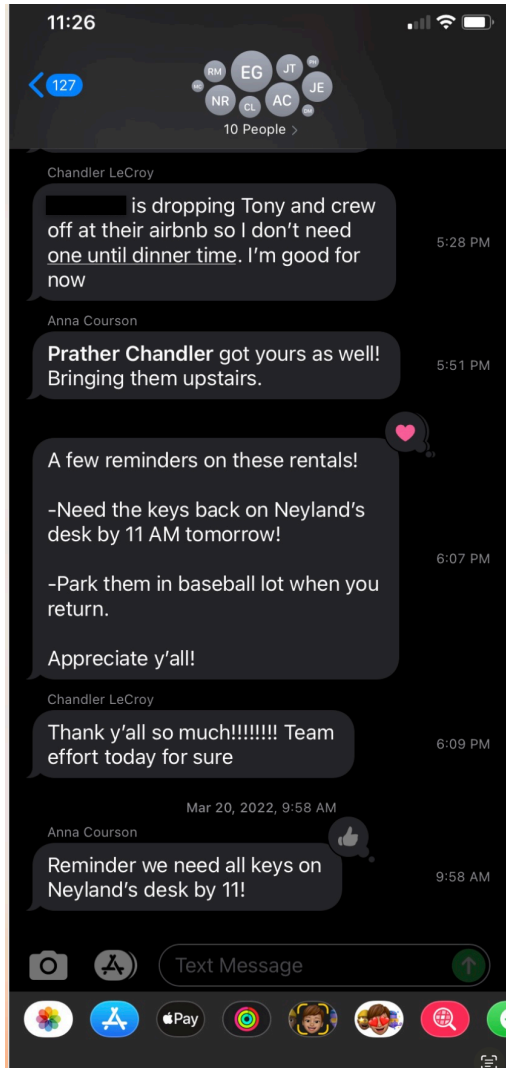




***Exhibit A-8, December 13, 2019 Text Message.***

52. “Haley” referred to in the December 13, 2019 text message is Haley Schaafsma, who was Director of Recruiting Operations at the time the text was sent.

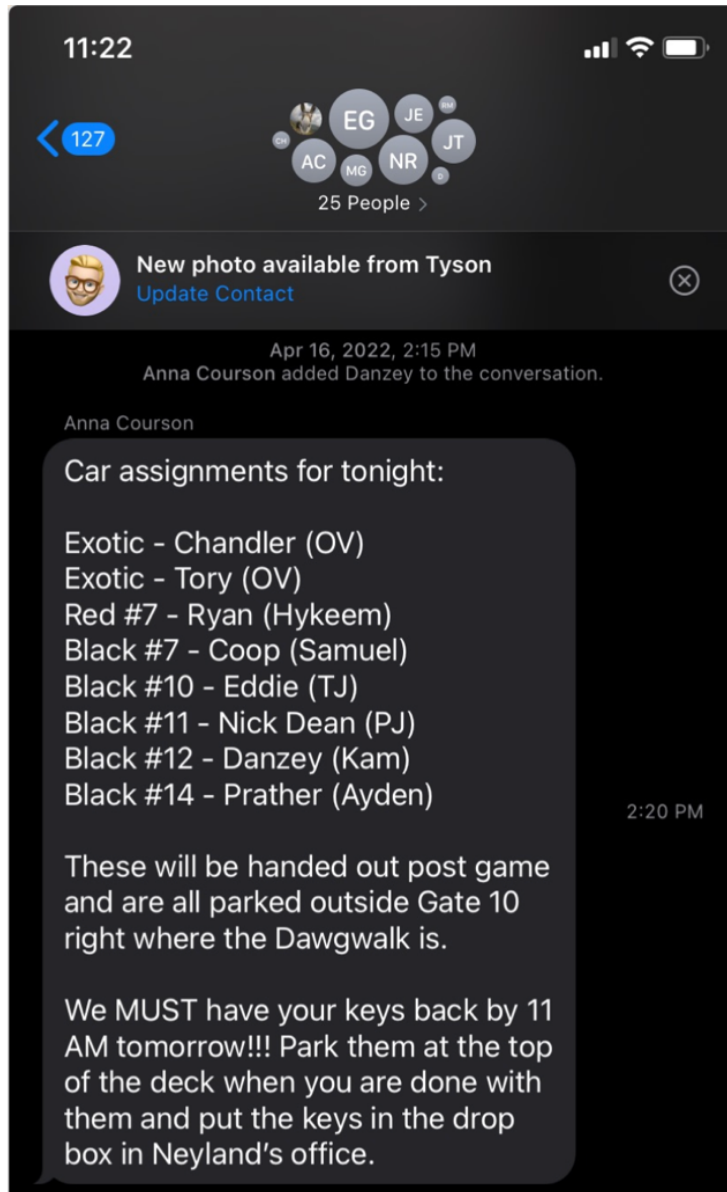
53. On Saturday March 19, 2022, Anna Courson, the Assistant Director of Football Operations/Recruiting, copied Ms. Bowles and others on a text message that she sent to LeCroy wherein Courson informed LeCroy that LeCroy could return her UGA Athletic Association rental vehicle “by 11 AM tomorrow!” (i.e. on Sunday).



**Exhibit A-9, March 19 & 20, 2022 Text Messages (name redacted).**

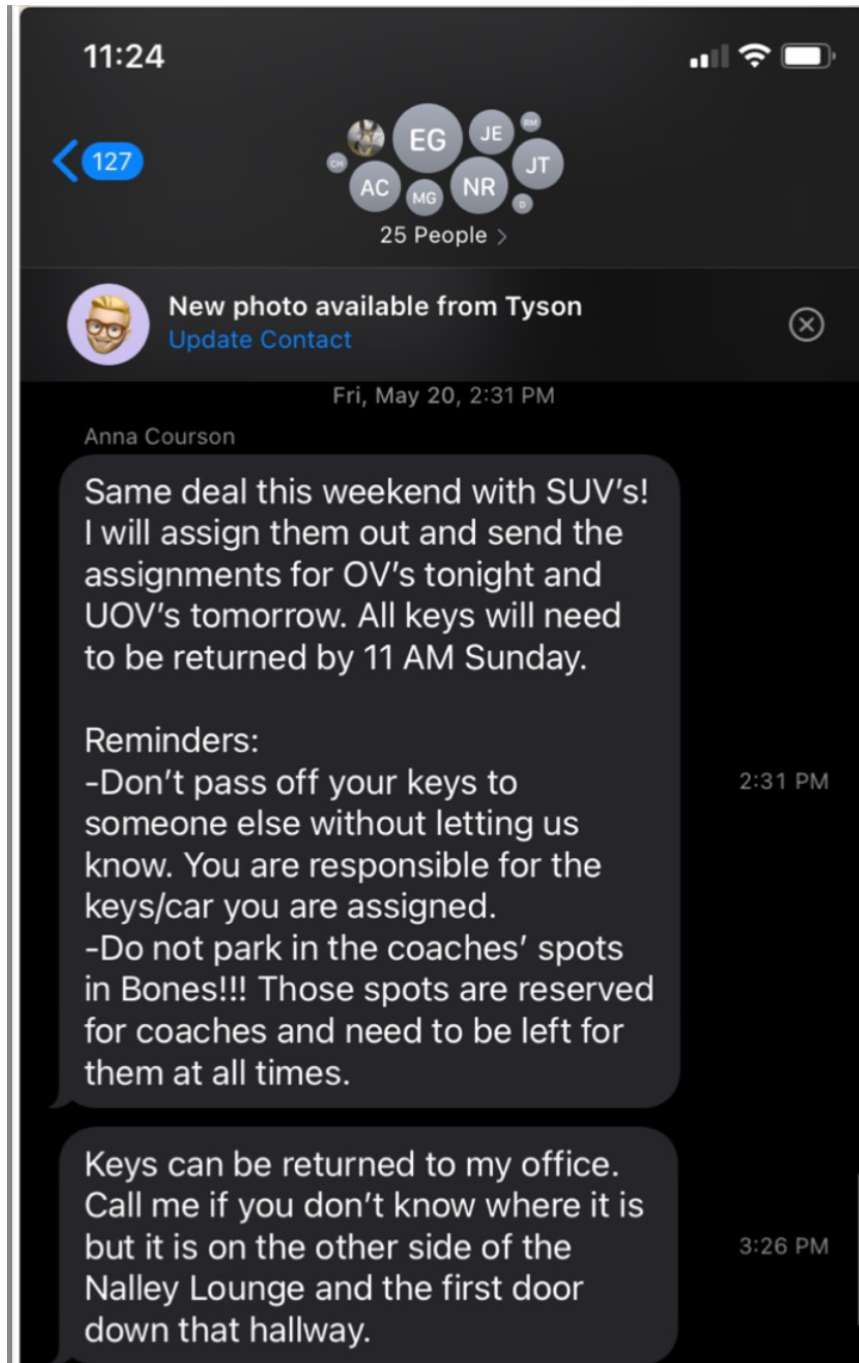
54. Anna Courson was in charge of allocating UGA Athletic Association rental vehicles to UGA Athletic Association recruiting analysts and other staff.

55. On April 16, 2022, Ms. Courson sent a text message to eight Athletic Association staff members, including LeCroy and Ms. Bowles, stating: “These [keys] will be handed out post game... We MUST have your keys back by 11 AM tomorrow!!!”



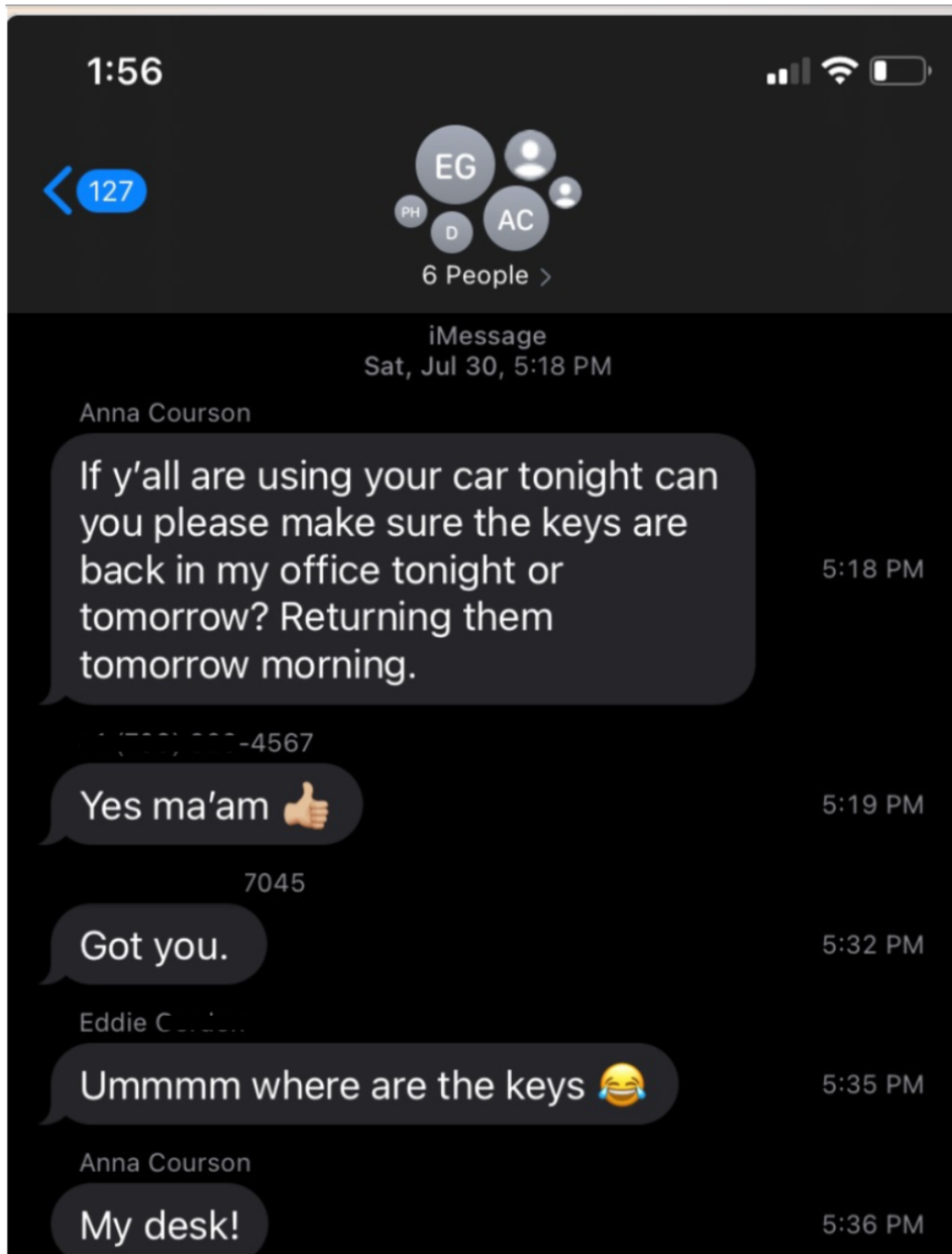
**Exhibit A-10, April 16, 2022 Text Message.**

56. A text message dated Friday May 20, 2022 from Ms. Courson, sent to approximately 25 Athletic Association staff members, states: "All keys will need to be returned by 11 AM Sunday."



**Exhibit A-11, May 20, 2022 Text Message.**

57. A text message dated July 30, 2022 from Ms. Courson to six Athletic Association staff members directed staff members to return UGA Athletic Association vehicles by “tomorrow morning.”



***Exhibit A-12, July 30, 2022 Text Message (individual phone numbers redacted).***

58. *A text message dated January 25, 2022 from Angela Kirkpatrick, a recruiting supervisor, states:*

*If you have an SUV and you're not driving anyone Those SUVs need to get back to Butts ASAP!!" (This text shows that recruiting staff kept their SUVs when not engaging in recruiting activities).*

Angela Kirkpatrick UGA WORK

If you have an SUV and you're not driving anyone Those SUVs need to get back to Butts ASAP!!

*Exhibit A-13, January 18, 2020 Text Message From Angela Kirkpatrick to Other Football Program Staffers.*

59. *A text message dated October 7, 2022 from Anna Courson states:*

*Hey y'all! Your keys for this weekend are on my desk and the cars are parked at Bones. I put Chandler in 1, Tory in 2, and Tess in 3!*

iMessage  
10/7/22, 10:30 AM

Anna Courson

Hey y'all! Your keys for this weekend are on my desk and the cars are parked at Bones. I put Chandler in 1, Tory in 2, and Tess in 3!

*Exhibit A-14, October 7, 2022 Text Message From Anna Courson to Other Football Program Staffers.*

60. *An October 1, 2021 text from recruiting staffers Katie Turner, Neyland Raper and David Cooper to numerous Athletic Association staff, involving six vehicles, states: All vehicles must be returned by Sunday am . . ." (October 1, 2021 was a Friday).*

Neyland Raper

In summary of all the texts earlier:  
Cody will hand SUV#4 to Juwan

Drake will hand SUV #8 to David Cooper

Drew will hand SUV #9 to Ryan

Kevin will hand SUV #10 to Carson

Sam will hand SUV #7 to Logen

Reed will hand SUV #6 to Robert

If you are picking up a car in the 2nd half, make sure to grab the right number!

Your keys will be in the production studio.

Drivers: All vehicles must be returned Sunday am to baseball outfield!  
Keys can go on my desk or Anna/Lew's desk.

*Exhibit A-15. "October 1, 2021 Text Message From Neyland Raper to Other Football Staffers.*

*61. A November 19, 2021 text from Mr. Raper to Ms. Bowles states: "Please park in the baseball lot on Sunday and drop keys on Anna/Lew's desk when done!" (November 19, 2021 was on a Friday).*

iMessage  
11/19/21, 10:32 AM

Neyland Raper

Tory!

You will be in SUV # 1 with Squirrel this weekend. You can get your keys this afternoon in Anna/Lew's office.

Make sure to drop them off in that office before the game so your driver can grab keys for you post-game!

Please park in the baseball lot on Sunday and drop keys on Anna/Lew's desk when done!

Thanks!

***Exhibit A-16, November 19, 2021 Text Message From Neyland Raper to Other Football Program Staffers.***

62. *A text message on October 9, 2022 from Ms. Courson to LeCroy states: "We're going to return your cars early tomorrow morning if y'all wouldn't mind just putting the keys on my desk :)"*

iMessage  
10/9/22, 7:02 PM

Anna Courson

We're going to return your cars early tomorrow morning if y'all wouldn't mind just putting the keys on my desk :)

***Exhibit A-17, October 9, 2022 Text Message From Anna Courson to Other Football Program Staffers.***

63. *A June 25, 2021 text from Ms. Courson to Ms. Bowles states: "Hey! Any word on that*



*SUV from last night?” Ms. Bowles responds, referring to an Association staffer: “He told me he ended up taking it home-I am about to see him in a few minutes and I’ll make sure he still has it.”*

6/25/21, 8:45 AM

Hey! Any word on that SUV from last night?

He told me he ended up taking it home - I am about to see him in a few minutes and I’ll make sure he still has it 👍 thank you!

**Exhibit A-18, June 25, 2021 Text Message From Anna Courson to Ms. Bowles.**

64. *Confronted with some of the above text messages, the Association, in its legal pleading (Answer) to the lawsuit contradicted its public statements made soon after the crash, which had stated that vehicles had to be turned in by recruiting staff at “the immediate conclusion of recruiting duties” or could only be used for “recruiting activities.” The Association’s revised statement contended SUVs could “occasionally” be driven home “when recruiting activities required it, for example, an early morning start for the next day’s recruiting activities.” This statement is false, because recruiting analysts were permitted to keep the rental vehicles even when no recruiting activities were occurring the following day.*

**Events At & From Sakura Restaurant**

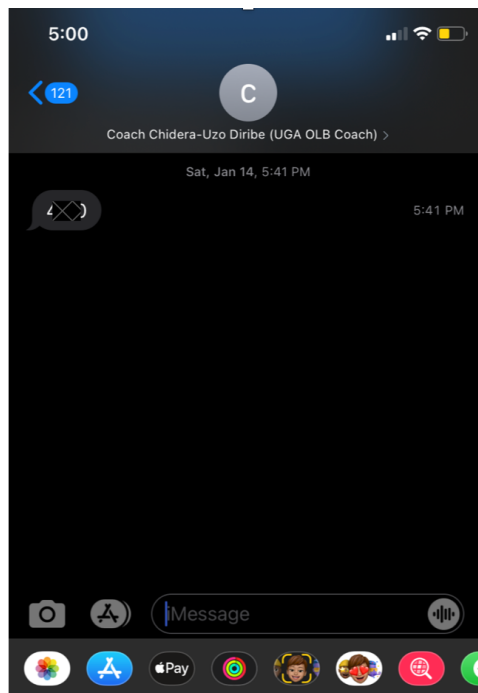
65. Following the Championship Celebration events at *Sanford Stadium* and later at the *Butts-Mehre* football facility, Ms. Bowles transported, in her assigned red rental SUV, UGA football Coach Glenn Schumann, as well as her assigned recruit (who was at UGA on an unofficial recruiting visit) to an unofficial recruiting event/dinner at *Sakura* restaurant located in “Five Points” in Athens, Georgia.

66. Following the Championship Celebration events at *Sanford Stadium* and later at the *Butts-Mehre* football facility, LeCroy also transported, in her assigned black rental SUV, her assigned

recruit (who was also on an unofficial recruiting visit to UGA), along with the recruit's mother and aunt, to the same unofficial recruiting event/dinner at *Sakura* restaurant.

67. Also in attendance at the unofficial recruiting event/dinner at *Sakura* that evening were UGA football coaches Chidera Uzo-Diribe and Tray Scott, UGA Graduate Assistant, Carson Hall, and Director of Recruiting Administration, Christina Harris, as well as an unknown man with the group.

68. After arriving at the unofficial recruiting event at *Sakura*, but before being able to eat dinner herself, Ms. Bowles was asked by Coach Uzo-Diribeto to take his personal ATM card and obtain \$1,000.00 in cash from a nearby ATM before the end of dinner.



***Exhibit A-19, Screen Shot of Text From Coach Uzo-Diribe to Ms. Bowles, with his (redacted) ATM Pin Number, sent at 5:41 p.m.***

69. Ms. Bowles complied with Coach Uzo-Diribeto's personal request, and along with LeCroy, left the unofficial recruiting event at *Sakura*.

70. LeCroy and Ms. Bowles initially walked to an ATM inside a convenience store next door to

*Sakura*. Coach Uzo-Diribe’s ATM card was declined for any withdrawal amount.

71. When Coach Uzo-Diribe’s ATM card was declined at the first ATM, LeCroy and Ms. Bowles walked back to the rental SUV provided to LeCroy by the UGA Athletic Association, and drove to another convenience store next to the UGA track to use a different ATM. Coach Uzo-Diribe’s ATM card was again declined for any withdrawal amount.

72. After the second denial, Ms. Bowles decided to use her own personal ATM card to obtain as much of the requested \$1,000.00 in cash as possible.

Transaction details

\$243.99

Transaction: 01/17/2023

Posted: 01/17/2023

Merchant info

ATHENS, GA 30605

Additional info

**Method**

Card Inserted

**Category**

Non-Wells Fargo ATM

**Transaction description**

NON-WF ATM WITHDRAWAL AUTHORIZED ON 01/14

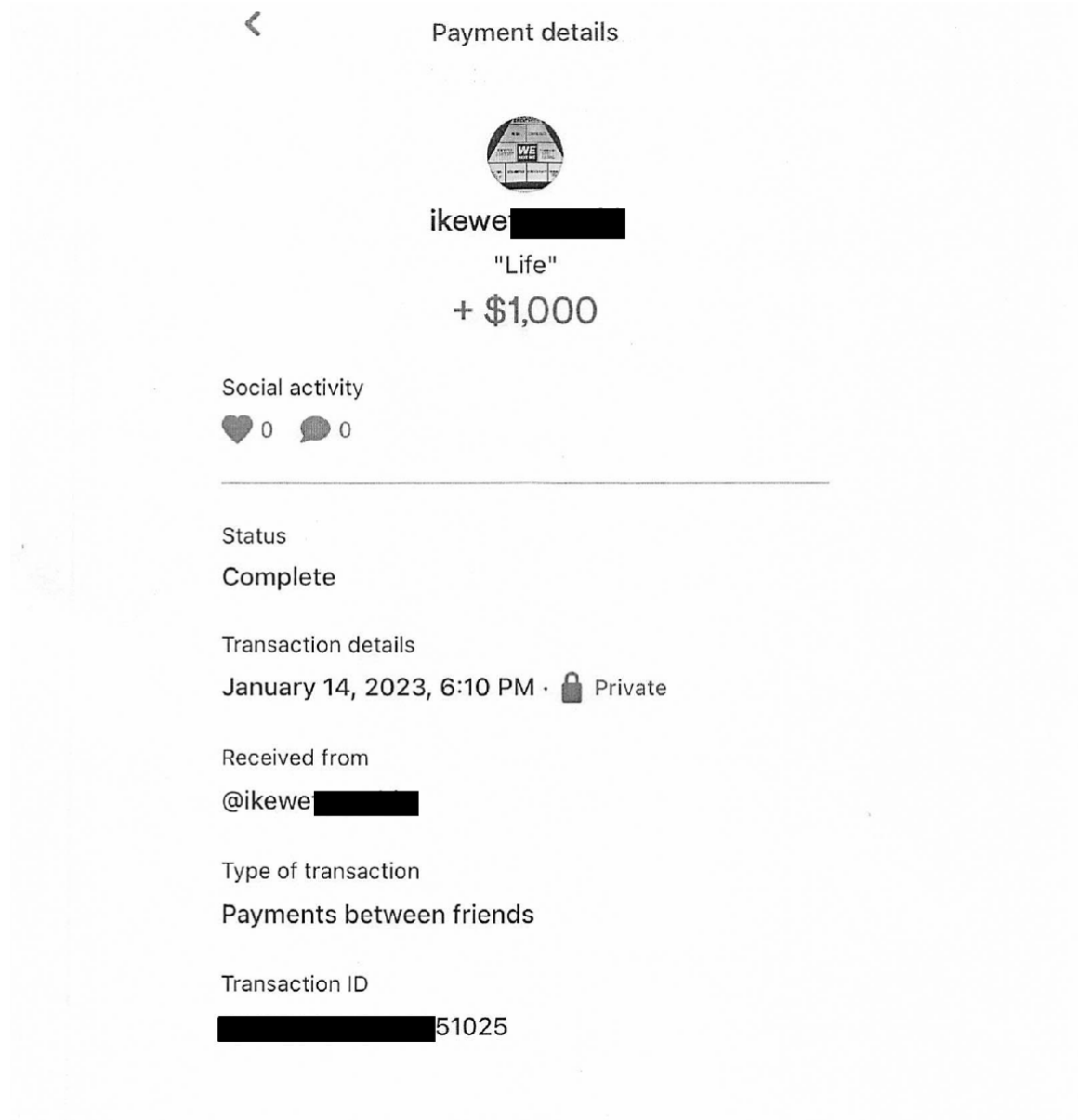
1333 S LUMPKIN ST ATHENS GA [REDACTED]

ATM ID PA002183 CARD 8740

***Exhibit A-20, Ms. Bowles’ Wells Fargo ATM withdrawal record (card number redacted) showing at the bottom “WITHDRAWAL AUTHORIZED ON 01/14”(red box added).***

73. At 6:10 p.m., Coach Uzo-Diribe, aware that his ATM card was not working, used his *Venmo* account (a mobile payment application) and transferred \$1,000.00 to Ms. Bowles in return for the \$1,000.00 in cash that she was obtaining for him, listing the “Type of Transaction” as “Payment

between friends.”



**Exhibit A-21, The Venmo Receipt (in redacted format).**

74. Ms. Bowles and LeCroy then used LeCroy’s UGA Athletic Association rental SUV to obtain the balance of the \$1,000.00 in cash requested by Coach Uzo-Diribe. At approximately 6:20 pm they drove to Ms. Bowles’ home, one-and-one-half miles away, to obtain the remainder of the requested cash (from Ms. Bowles’ babysitting earnings and Christmas gifts).

75. Ms. Bowles, along with LeCroy, after retrieving cash from her home, returned to the unofficial recruiting event at *Sakura*, and discreetly provided UGA football Coach Uzo-Diribe with his requested cash.

76. Upon information and belief, Coach Uzo-Diribe was aware (as Coach Schumann was), before Ms. Bowles and LeCroy left *Sakura* on both occasions, that they both initially arrived at *Sakura* in UGA Athletic Association rented SUVs.

***77. As Coach Uzo-Diribe was aware at the time, recruits and their families and guests were not transported in Athletic Association recruiting analysts' personal vehicles. Luxury SUVs were utilized by the Association to impress recruits, their families and guests and to provide an individualized experience.***

78. The recruits/prospects and their guests dining at *Sakura* were on unofficial recruiting visits to UGA, and there were no official recruiting visits to Athens during the Championship Celebration weekend.

***79 (a). Ms. Bowles was aware at the time of the Sakura incident that Association coaches could not, under NCAA Rules and Regulations, pay for recruits' or their guests' meals, drinks, lodging, etc., during unofficial recruiting visits. (As detailed below, only the Association, and not Ms. Bowles prior to the filing of this Amended Complaint, has raised the issue of NCAA recruiting violations; Ms. Bowles has only pled facts of events relating to permissive use).***

***79 (b). Ms. Bowles, from her own observations, was aware of UGA football coaches' engaging in recruiting activities using cash in connection with unofficial visits prior to that evening. Ms. Bowles is also aware of a written request made prior to that evening from a recruiting supervisor directing staff to "address with every single coach" the need "to get coaches to pay for unofficial visitors." Ms. Bowles, however, does not know why Coach Uzo-Diribe requested \$1,000.00 in***

*cash that evening. Therefore, Ms. Bowles gives Coach Uzo-Diribe the benefit of the doubt as to whether the cash was to be used for an impermissible NCAA rules violation(s).*

*79 (c). Accordingly, Ms. Bowles' use of the UGA Athletic Association rental SUV to obtain the requested \$1,000.00 in cash was presumably not for "recruiting activities," but, was for personal use - a personal favor to Coach Uzo-Diribe.*

*79 (d). An Atlanta Journal Constitution article (after the original Complaint was filed, but before the Association filed an Answer in this action), reported the Association's following statement: "The Complaint alleges the money was for the Coach's personal use, and based on our review, we have no reason to disagree." (The Complaint actually stated the cash "was presumably not for "recruiting activities").*

*79 (e). However, the Association in its Answer to this action contradicted its prior public statement by denying in its entirety the allegations of paragraph 43 of the original Complaint, which alleged, in part, that "The use of the UGA Athletic Association rental SUV to obtain the requested \$1,000.00 in cash was presumably not for "recruiting activities," but, was for personal use - a personal favor to Coach Uzo-Diribe." (Under O.C.G.A. § 9-11-8(b), when a party intends to deny only a part or a qualification of a plaintiff's allegations, the party shall specify so much of it as is true and material and shall deny only the remainder).*

*79 (f). Moreover, the Association in its Answer to this action further contradicted its prior public statement by denying in its entirety the allegations of paragraph 45 of the original Complaint, which alleged, in part, that Ms. Bowles and LeCroy were on a "personal errand to obtain Coach Uzo-Diribe's cash."*

*79 (g). By contradicting its pre-Answer public statement with denials of the allegations of paragraphs 43 and 45 of Ms. Bowles' original Complaint (lawsuit) in its Answer, the Association,*

*in effect, contends that the requested \$1,000.00 in cash was for a recruiting purpose, and not a personal purpose.*

*79 (h). After the Association’s Answer in this action was filed, an Atlanta Journal Constitution article reported the Association’s following public statement, contradicting its denials of paragraphs 43 and 45 of the Complaint: “We don’t dispute that the money was for the Coach’s personal use . . .”*

*79 (i). Emails, addressed below, sent to Ms. Bowles’ as a UGA employee (through her counsel) immediately after the original Complaint was filed, by William Lawler (UGA’s Deputy Athletic Director for Legal and Regulatory Affairs/Assistant General Counsel for Athletics, who oversees the NCAA Compliance Office) also contradict the Association’s public statements on the Sakura incident. His emails demonstrate that UGA and the Association have concerns that the cash requested and obtained by Coach Uzo-Diribe was to be used for an impermissible purpose under NCAA rules. (See ¶¶ 79(j) -79(n)).*

*79 (j). On July 15, 2023, Mr. Lawler sent an email directed to Ms. Bowles’ as a UGA employee (through her counsel) stating, in part: “The Complaint sets out factual assertions that could give rise to a NCAA inquiry about matters of which she might have personal knowledge . . .”.*

*79 (k). Previously, on July 13, 2023 (the day the lawsuit became public), Mr. Lawler sent an email directed to Ms. Bowles’ as a UGA employee (through her counsel) stating: “We have received information that Ms. Tory Bowles may have been involved in or have knowledge of possible NCAA rules violations . . . While it is unclear (emphasis added) whether any NCAA violations occurred, it is imperative that we speak with Ms. Bowles no later than 5 p.m. tomorrow, July 14, 2023.” (Ms. Bowles was terminated by the Association within less than a month of Mr. Lawler’s emails).*

**From:** William Lawler <[REDACTED]>

**Date:** Thursday, July 13, 2023 at 5:09 PM

**To:** Rob Buck <[REDACTED]>

**Cc:** Michael Raeber <[REDACTED]> Scott Bailey <[REDACTED]>

**Subject:** Interview Request - Tory Bowles

Mr. Buck,

I am writing in my capacity as Deputy Athletic Director for Legal and Regulatory Affairs in the University of Georgia Athletic Department. As part of this role, I oversee the UGA Athletics Compliance office.

We have received information that Ms. Tory Bowles may have been involved in or have knowledge of possible NCAA rules violations. Outside counsel for the University and the University of Georgia Athletics Association have requested to interview Ms. Bowles on multiple occasions and have been denied such opportunities up to this point. While it is unclear whether any NCAA violations actually occurred, it is imperative that we speak with Ms. Bowles no later than 5 pm ET tomorrow, Friday, July 14, 2023, to preserve the integrity of the review.

***Exhibit A-22, July 13, 2023 Excerpt of Email from William Lawler to Ms. Bowles' Counsel.***



**William Lawler** <[REDACTED]>

Saturday, July 15, 2023 at 10:39 AM

**To:** Rob Buck; **Cc:** Michael Raeber; Scott Bailey; Phil Boston

Thank you for the response, Rob. Unfortunately, because she is an employee of the University, we will still need to interview Ms. Bowles as soon as possible. Whether Ms. Bowles intended to allege NCAA violations or not, the Complaint sets out factual assertions that could give rise to an NCAA inquiry about matters of which she might have personal knowledge, and we are obligated to gather information about the same under NCAA requirements.

***Exhibit A-23, July 15, 2023 Excerpt of Email from William Lawler to Ms. Bowles' Counsel.***

***79 (l). If Coach Uzo-Diribe's use of the \$1,000.00 in cash was, for example, for personal purchases, Ms. Bowles' use of the Association SUV to obtain the cash would have been for her personal use – as a personal favor to Coach Uzo-Diribe--establishing that recruiting analysts were permitted to use Association vehicles for personal use.***

***79 (m). Even if Coach Uzo-Diribe intended to, or did, use the \$1,000.00 in cash to commit a NCAA recruiting violation (such as to pay for food consumed by unofficial recruits and/or to pay for food and alcohol consumed by unofficial recruits' guests), Ms. Bowles' use of the Association SUV to obtain the cash for Coach Uzo-Diribe for a purpose unknown to Ms. Bowles - was likewise***



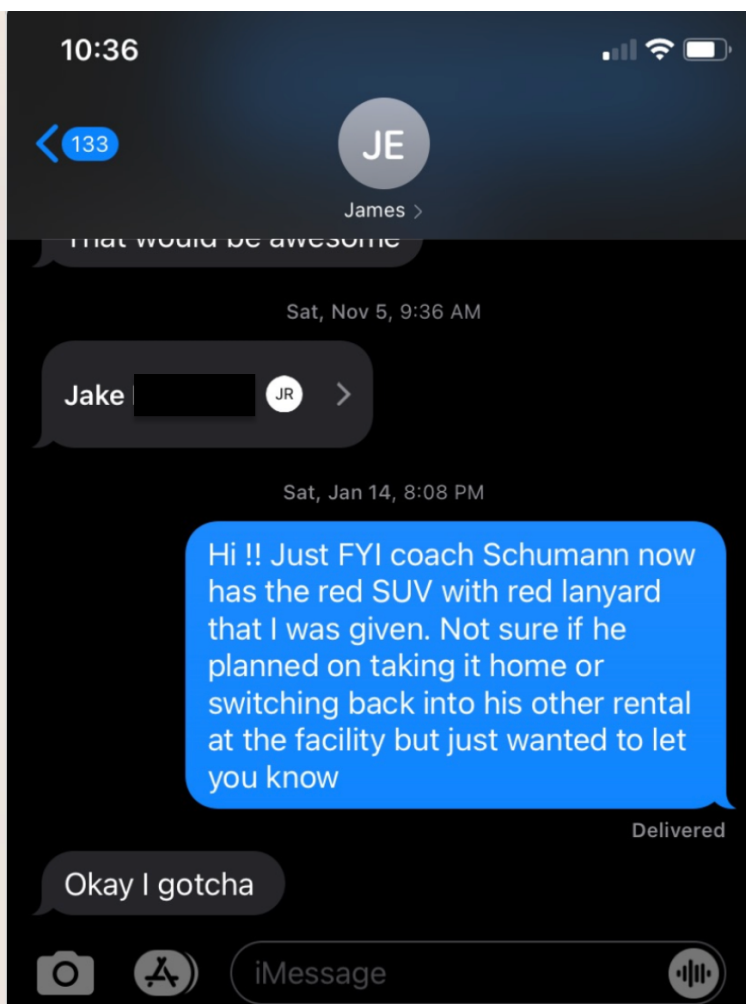
*for personal use – as use of the SUV was a personal favor to Coach Uzo-Diribe - also establishing that recruiting analysts were directed and permitted by the coaching staff to use Association vehicles for personal use.*

*79 (n). Public statements made by the Association on the Sakura incident, before and after the Association's Answer to this lawsuit, contradict its Answer, as detailed above. UGA's Deputy Athletic Director's emails contradict the Association's public statement. The Association through its Answer, seeks to have it both ways on the purpose of the \$1,000.00 in cash - one for legal purposes (not for personal use); another for public consumption (for personal use, but not for an unofficial recruiting visit purpose).*

80. When Ms. Bowles and LeCroy returned to the unofficial recruiting event/dinner at *Sakura* from the personal errand to obtain Coach Uzo-Diribe's cash, the recruiting event was concluding. Their meals were provided to them in to-go boxes.

81. Upon returning to *Sakura*, Coach Schumann advised Ms. Bowles that he was taking her assigned recruit to go axe throwing at *LumberJaxe's*, located on N. Lumpkin Street in Athens, following the unofficial recruiting dinner and asked for the keys to Ms. Bowles' assigned SUV.

82. Ms. Bowles provided Coach Schumann with the keys to her assigned red SUV and subsequently texted James Ellis (UGA Player Personnel Coordinator), one of the UGA Athletic Association staff members responsible for coordinating the return of rental SUVs that weekend, that Coach Schumann now had her red SUV.



***Exhibit A-24: Screen Shot of Text from Ms. Bowles to James Ellis addressing transfer of the SUV keys to Coach Schumann-stating, in part, “Not sure if he planned on taking it home or switching back into his other rental at the facility. . .”***

83. Because Ms. Bowles no longer had any means of transportation after returning to *Sakura*, she asked LeCroy if she could ride along with LeCroy, LeCroy’s prospect, and his family in LeCroy’s Association rental SUV. LeCroy agreed.

84. Following the unofficial recruiting event at *Sakura*, Ms. Bowles rode with LeCroy back to *Butts-Mehre* to drop off LeCroy’s prospect’s family members.

85. After dropping LeCroy’s prospect’s family members off at the football facility, LeCroy, with

Ms. Bowles riding along, then took LeCroy's assigned prospect back to the *Hampton Inn* located at 2220 W. Broad Street, over one mile from campus, where the prospect and his family were staying.

86. LeCroy's prospect went inside to change clothes. While LeCroy and Ms. Bowles waited for the prospect to return, they ate their to-go food from *Sakura's* in the drop off area immediately in front of the *Hampton Inn* while in the black rental SUV.

87. When LeCroy's prospect came downstairs from his hotel room at approximately 8:24 pm, they drove the prospect to UGA's East Campus Village to be dropped off with his UGA player host at the *McWhorter Hall* dorm. Prior to being dropped off, the prospect asked LeCroy and Ms. Bowles to photograph him posing in front of the SUV using the East Campus Village parking deck as a backdrop. LeCroy and Ms. Bowles complied with the request and the prospect eventually entered the player host's East Campus Village dorm at approximately 9:09 pm.

88. After dropping the prospect off at the East Campus Village dorm, LeCroy and Ms. Bowles then returned to *Butts-Mehre* so that LeCroy could obtain her purse out of her personal car.

89. While at *Butts-Mehre*, LeCroy informed Ms. Bowles that she had been given permission by the UGA Athletic Association to keep her black rental SUV until the following day.

90. LeCroy's statement to Ms. Bowles at *Butts-Mehre* that "I was told that I could keep [the SUV] until tomorrow" was consistent with Ms. Bowles' own prior experience and instructions given to her by her UGA Athletic Association supervisors regarding the use of Association rental SUVs by recruiting analysts.

91. Ms. Bowles and LeCroy, after dropping off the recruit at the *McWhorter Hall* dorm and subsequently arriving at *Butts-Mehre* on January 14, 2023, then left *Butts-Mehre* in the black rental SUV to return to LeCroy's apartment. They stayed at LeCroy's apartment for approximately one hour before traveling to downtown Athens in the black rental SUV to join in the ongoing

Championship Celebration.

92. Ms. Bowles and LeCroy arrived in downtown Athens after 10:00 pm on the evening of January 14, 2023, and parked the SUV near the front entrance of *Starland*, at 145 E. Clayton Street.

93. ***Ms. Bowles and LeCroy almost immediately encountered UGA Athletic Association staff member Anna Courson as they crossed the street after parking the vehicle. (Ms. Courson was the supervisor who had assigned LeCroy the black rental SUV earlier that day).***

94. After speaking with Anna Courson, LeCroy and Ms. Bowles then proceeded to several locations including various crowded downtown establishments, where they encountered friends, UGA fans and players.

95. Ms. Bowles and LeCroy walked to various locations that evening together downtown, but they were often separated. While Ms. Bowles did observe LeCroy drink limited amounts of alcohol that evening, when they were together she did not observe LeCroy consume enough alcohol to lead Ms. Bowles to reasonably believe that LeCroy may have been legally intoxicated or in any way impaired.

96. During the course of that evening, Ms. Bowles and LeCroy encountered UGA football players Devin Willock and Warren McClendon, among others, who at a point in time while Ms. Bowles was away from the group, invited LeCroy to join them at *Toppers International Show Bar* ("*Toppers*"). LeCroy then told Ms. Bowles that she was going to *Toppers* with Devin Willock and Warren McClendon and others.

97. Ms. Bowles had met and interacted with Willock and McClendon at the football facility previously, but did not know either player well.

98. Because LeCroy was Ms. Bowles' ride and Ms. Bowles did not want to be left downtown alone that evening, she decided to go with the group to *Toppers*.

99. At the time Ms. Bowles and LeCroy arrived at *Toppers*, Ms. Bowles had no reasonable basis to believe that LeCroy was intoxicated or impaired by alcohol, based upon the limited amount of alcohol that Ms. Bowles had observed LeCroy consume over the course of the evening.

100. Once inside *Toppers*, Ms. Bowles separated from LeCroy. Ms. Bowles joined a group of UGA football players' girlfriends and students associated with the football recruiting program, who had gathered immediately inside the main entrance of *Toppers*. Because Ms. Bowles and LeCroy separated when they entered *Toppers*, Ms. Bowles has limited knowledge of LeCroy's activities inside *Toppers*.

101. Ms. Bowles did not spend any appreciable amount of time with LeCroy inside of *Toppers* and had no basis to know or appreciate the amount of alcohol that LeCroy may have consumed at *Toppers* between the time they arrived together and the time they left *Toppers*.

**102. Significant portions of events while Ms. Bowles and LeCroy were inside Toppers were video recorded by Toppers.**

103. When *Toppers* closed, LeCroy, who was with UGA football players Devin Willock, Warren McClendon and others, found Ms. Bowles near the main entrance.

104. Ms. Bowles, who had no basis to know or appreciate what amount of alcohol that LeCroy may have consumed at *Toppers*, left with LeCroy, Willock and McClendon.

105. Athens-Clarke County video surveillance (hereinafter "ACC video") shows Ms. Bowles walking a considerable distance away from LeCroy and UGA football players Warren McClendon and Devin Willock after they all had exited *Toppers*.

106. ACC video shows LeCroy walked normally, ***including up an inclining street while walking backwards while speaking with Warren McClendon and Devin Willock***, and she did not appear intoxicated.

107. LeCroy, Ms. Bowles, Warren McClendon and Devin Willock walked to the UGA Athletic Association rental SUV- which, as previously stated, was parked near the front entrance of *Starland* on E. Clayton Street.

108. Ms. Bowles entered the LeCroy SUV, as LeCroy was her ride home.

109. Ms. Bowles got into the back seat passenger side of the black rental SUV, where she stayed until the subject crash occurred.

110. When entering as a backseat passenger in the black rental SUV, Ms. Bowles was unaware that LeCroy may have been legally intoxicated, that LeCroy would be engaging in street racing in concert with Defendant Carter, or that LeCroy would be driving the rental SUV in excess of 100 mph.

111. Warren McClendon and Devin Willock also entered the LeCroy SUV, and LeCroy agreed to take the occupants to a *Waffle House*.

#### **Events of the Fatal Trip**

112. After leaving the parking space near *Starland*, both LeCroy and Defendant Carter traveled on E. Clayton Street (a two-lane, one-way street) heading towards N. Thomas Street (which was less than 0.20 miles away).

113. ACC video shows Defendant Carter, in the left lane, and the LeCroy SUV, in the right lane, stopped at a traffic light at the intersection of E. Clayton Street and College Avenue (a very short one-half block away from *Starland*).

114. ACC video shows that Defendant Carter aggressively accelerated into the intersection of E. Clayton Street and College Avenue.

115. ACC video shows that the LeCroy SUV subsequently moved into the intersection at a slow speed.

116. ACC video then shows, a very short block away, Defendant Carter stopped in the right lane of E. Clayton Street, at a traffic light, at the intersection of E. Clayton Street and Jackson Street, with the LeCroy SUV stopped behind him.

117. ACC video shows that Defendant Carter then aggressively accelerated into the E. Clayton Street and Jackson Street intersection and sped away at an excessive speed, and then aggressively, without signaling, moved into the left lane and passed a vehicle that was stopped in the right lane of E. Clayton Street.

118. ACC video shows that the LeCroy SUV, on E. Clayton Street, moved into the E. Clayton Street and Jackson Street intersection at a slow speed, and subsequently, after initiating her left-turn signal, passed the vehicle that was stopped in the right lane of E. Clayton Street.

119. ACC video shows that Defendant Carter made a right turn, without stopping and at a fast pace, onto N. Thomas Street.

120. ACC video shows that after turning, Defendant Carter ***entered, without signaling***, the “left turn only” lane on N. Thomas Street, and stopped behind several vehicles, which were waiting to turn left onto Oconee Street at the N. Thomas Street/E. Broad Street intersection.

121. ***ACC videos show that LeCroy stopped at the same E. Clayton Street turn location (seventeen seconds after Defendant Carter). LeCroy then signaled and made a slow right turn onto N. Thomas Street. Traffic on N. Thomas Street was moving slowly as LeCroy signaled and entered the “left turn only” lane three vehicles behind Defendant Carter.***

122. ACC video shows that Defendant Carter and the LeCroy vehicle followed a line of vehicles that were slowly turning onto Oconee Street (also known as the “Lexington Highway” or “***Lexington Road***”).

123. University of Georgia video shows Defendant Carter, at approximately .175 miles after turning onto Oconee Street, approaching a vehicle in front of him at a high rate of speed, and passing that vehicle at a fast speed in a “left turn only” lane of travel (in his direction).

124. The “left turn only” lane turned into Hickory Street.

125. At the end of the brief “left-turn only” lane, Defendant Carter, *after briefly traveling in the on-coming lane of travel (in an on-coming “left turn only” lane)*, without signaling, pulled back into his original lane of travel behind numerous slow-moving vehicles.

126. University of Georgia video shows that LeCroy, four seconds after Defendant Carter entered the “left-turn only” lane of travel, *entered the brief “left turn only” lane at a slower pace, then briefly entered an on-coming lane of travel, largely traveling in an on-coming “left turn only” lane, for about five seconds (but braking after about two seconds)*, then passed, it appears, two or three vehicles, and then, after signaling, pulled back into her lane behind numerous slow-moving vehicles-*all of the above occurring without any approaching vehicles.*

*127. Ms. Bowles was unaware, while in the back seat of the large SUV, that LeCroy entered the “left turn only” lanes.*

*128. Ms. Bowles has no personal knowledge, and no video or evidence exists to her knowledge, that either SUV subsequently entered an on-coming lane of travel-as media reports appear to suggest.*

*129. University of Georgia video shows that before the “left turn only” lanes Defendant Carter and LeCroy (the second vehicle traveling behind Defendant Carter) were following a line of vehicles, and both were driving slowly, not tailgating and not weaving.*

130. At a distance of approximately one-half mile from the end of the “left turn only” lane,



Defendant Carter, law enforcement determined through video surveillance, passed a *Dairy Queen* while traveling 100 mph.

131. Law enforcement determined, through video surveillance, that the LeCroy SUV, behind Defendant Carter, passed the *Dairy Queen* at 78 mph.

**132. As University of Georgia video shows, LeCroy, after the left turn only lanes, followed a line of vehicles that were traveling at a slow pace on a single lane road for, upon information and belief, eleven to thirteen seconds or longer.**

**133. Upon information and belief, relying on University of Georgia video and a review of the roadway, once LeCroy entered two lanes of roadway in her direction, she would still have been following slow moving vehicles, and could have reached the estimated 78 mph only after seven or eight more seconds.**

**134. Accordingly, LeCroy would only have traveled up to the estimated 78 mph for a few seconds, both before and after the Dairy Queen, and largely on a straight roadway-in part determined from the fact, as video shows, that she slowly turned into a Waffle House approximately 0.3 miles from the Dairy Queen, as addressed below.**

135. After passing the *Dairy Queen*, Defendant Carter and the LeCroy rental SUV traveled approximately 0.3 miles before turning into the *Waffle House* on Oconee Street at approximately 2:41:12 a.m.

136. **As video shows**, Defendant Carter arrived first at the *Waffle House* located on Oconee Street and parked in a parking space. LeCroy **slowly** pulled into the *Waffle House* after Defendant Carter and stopped her Association SUV behind his parked SUV.

137. **As video shows**, in the *Waffle House* parking lot, Defendant Carter exited his vehicle, walked to the LeCroy SUV and spoke to someone inside the vehicle on the driver's side.

138. Defendant Carter and LeCroy agreed to go to another nearby *Waffle House* on Barnett Shoals Road in Athens.

139. *As video shows*, no one but Defendant Carter exited either of the two vehicles while they were at the Oconee Street *Waffle House*.

140. ***Ms. Bowles had no knowledge while at the Waffle House or previously that evening that defendant Carter had been drinking, and has no such knowledge to date.***

141. *As video shows*, after the conversation between someone in the LeCroy SUV and Defendant Carter in the parking lot of the Oconee Street *Waffle House*, LeCroy left the *Waffle House* **ahead** of Defendant Carter to go to a *Waffle House* located on Barnett Shoals Road, which was only a short distance away.

142. *As video shows*, at 2:42:16 a.m., LeCroy's SUV exited the Oconee Street *Waffle House* parking lot onto the Grove Street Extension, traveling a short distance before making a right turn onto Oconee Street, followed by Defendant Carter, who exited the parking lot, ***seven seconds later***, at 2:42.23 a.m.

143. Accordingly, Defendant Carter and LeCroy were at the Oconee Street *Waffle House* for approximately 71 seconds.

144. During the brief amount of time between LeCroy leaving downtown Athens driving the black rental SUV and the time LeCroy and Defendant Carter both stopped at the *Waffle House* located on Oconee Street, LeCroy did not engage in any driving maneuvers that Ms. Bowles, as a backseat passenger ***in a large SUV, traveling in the dark***, perceived as being dangerous or placing her at risk of being injured in a crash.

***145. During the brief amount of time that LeCroy was traveling up to the estimated 78 mph before the Waffle House (largely on a straight roadway), Ms. Bowles did not perceive that speed,***

*as she was a backseat passenger in a large SUV, traveling in the dark.*

146. From the Oconee Street *Waffle House*, both subject SUVs traveled approximately 0.3 miles to the intersection of Oconee Street and Barnett Shoals Road, encountering three separate traffic signals, before turning right onto Barnett Shoals Road.

147. UGA football player Jamon Dumas-Johnson informed law enforcement that while stopped at the traffic light at the intersection of Oconee Street and Barnett Shoals Road he spoke with Defendant Carter while both were in their vehicles stopped at the light-a point in time before Defendant Carter and LeCroy began their street racing.

148. At some point along the route between the Oconee Street *Waffle House* and the intended *Waffle House* destination on Barnett Shoals Road, Defendant Carter pulled alongside the left side of LeCroy's black rental SUV and rolled down his passenger side windows.

149. On Barnett Shoals Road, Defendant Carter and LeCroy began street racing.

150. On Barnett Shoals Road, the subject SUVs passed a "76" convenience store, a distance of approximately 0.7 miles from the turn onto Barnett Shoals Road.

151. Video surveillance at the "76" convenience store shows the subject SUVs traveling side-by-side at approximately 2:46:01 a.m., with the LeCroy SUV determined by law enforcement to be traveling 99.472 mph (59.472 mph over the 40 mph posted speed limit), with Defendant Carter traveling at a nearly identical speed.

152. As LeCroy's speed increased on Barnett Shoals Road, Ms. Bowles *at some point realized that LeCroy was going too fast. Ms. Bowles attempted to lean over to look at the speedometer from the back seat of the large SUV, but she could not see the speedometer. At this point, becoming even more concerned about speed, Ms. Bowles verbally protested-but LeCroy ignored her, and continued racing Defendant Carter at speeds in excess of 100 mph until the crash occurred-all of*

*this happening within a few seconds.*

153. LeCroy's rental SUV, approximately 0.3 miles past the "76" convenience store, and on a curve while traveling in excess of 100 mph, left the roadway on the right side of the road, hit a utility pole cutting it in half; struck a tree; struck a light pole cutting it in two pieces; hit more trees; slammed into the side of an apartment building damaging a brick wall; and then rotated counterclockwise into the building where it came to rest.

154. LeCroy, four seconds before impact, was traveling 104.20 mph (64.20 mph over the 40 mph posted speed limit), according to the LeCroy SUV's airbag control module.

155. Defendant Carter, in effect, admits to street racing with Ms. LeCroy - despite his prior denials-as he stated to law enforcement during a February 10, 2023 recorded interview that near the curve of the crash he slowed his vehicle while beside the LeCroy vehicle, and she passed him.

156. Defendant Carter admitted in the interview that he then, while traveling behind LeCroy, observed her vehicle go off the road and strike a pole, saw the pole falling, and stated that a wire from the pole came down on his vehicle.

157. Athens-Clarke County Police determined that Defendant Carter's roof had scrape marks consistent with hitting falling power lines.

158. Defendant Carter could not have been further than approximately 0.1 miles (528 feet) from the LeCroy SUV impact area when he observed the crash as a vehicle approaching the area in his direction of travel would have a line of sight of the impact area of approximately 0.1 miles (528 feet), and even less from where LeCroy started leaving the roadway.

159. Defendant Carter's admissions, stated in ¶¶ 155-156 above, as well as scrape marks on his SUV, and video at the "76" convenience store, establish that at the moment of the crash he was traveling behind LeCroy at a speed similar to her extreme speed.

160. Defendant Carter stated in law enforcement interviews: “I was going an average speed” and “I wasn’t going fast.”

161. The UGA Athletic Association rented SUV driven by LeCroy was extensively damaged in the crash beyond recognition.



***Exhibit A-25, Photograph of damaged LeCroy SUV***



**Exhibit A-26, Stock Photograph of An Identical 2021 Ford Expedition SUV.**

162. The subject crash resulted in the death of LeCroy and the death of Devin Willock, who was a backseat passenger on the driver's side of the black rental SUV.

163. The subject crash, which was proximately caused by Defendant Carter's and LeCroy's joint enterprise and concerted act of tandem street racing, resulted in Ms. Bowles suffering multiple significant and debilitating injuries, addressed below.

**UGA Athletic Association's Knowledge of LeCroy's Prior Speeding & Reckless Driving**

164. The UGA Athletic Association was fully aware of LeCroy's pattern of speeding and reckless driving well before entrusting her with the subject black rental SUV on January 14 and 15, 2023.

165. LeCroy was cited for speeding (69 mph in a 55 mph zone) in Wilkes County, Georgia on October 20, 2016. Less than six weeks later, on December 8, 2016, in Jenkins County, Georgia, LeCroy received a "super speeder" ticket, pursuant to O.C.G.A. § 40-6-189, as she was traveling 88

mph in a 65 mph zone.

166. LeCroy was cited, on October 22, 2020, for traveling 64 mph in a 40 mph zone in Clarke County, Georgia. On October 30, 2022 (77 days before the subject crash), LeCroy was cited in Morgan County, Georgia for another “super speeder” offense-traveling 77 mph in a 55 mph zone.

167. LeCroy’s supervisor, Ms. Logen Reed, Associate Director of Recruiting Operations for the UGA Athletic Association, was in the vehicle with LeCroy at the time of the October 30, 2022 violation-as they were returning to Athens from the UGA/Florida football game in Jacksonville, Florida.

168. Prior to the subject crash, the UGA Athletic Association’s “Program Coordinator II/Director of Player Support and Operations,” Bryant Gantt (“Gantt”), attempted, in person, to get a Morgan County, Georgia court clerk to reduce LeCroy’s October 30, 2022 “super speeder” ticket.

169. Gantt was at the time and remains, upon information and belief, the UGA Athletic Association’s liaison between the UGA Athletic Association and law enforcement-with a 2022 salary of \$209,914.61. (*Gantt reports directly to Coach Smart on the Association’s organizational chart*).



***Exhibit A-27, Georgia Football Organizational Chart***

170. *Gantt’s role with the Georgia football program was well recognized by other staff members as evidenced by a June 11, 2021 text message sent by staffer Katie T. stating “If you get pulled over for texting, do NOT say you were texting Kirby Smart... IT DOES NOT WORK”*

*and responded to by another football staff member who advised “Should have said Gantt!”*

Katie T [REDACTED] UGA

If you get pulled over for texting, do NOT say you were texting Kirby Smart... IT DOES NOT WORK 🚓

Montgomery [REDACTED]

Should have said Gantt!

Jennifer [REDACTED]

Laughed at “Should have said Gantt! ”

**Exhibit A-28, June 11, 2021 text message sent by staffer Katie T. and responded to by other football staff members.**

171. Addressing her conversation with Gantt concerning the “super speeder” ticket, the Morgan County court clerk, Salisha Sanders, stated in an interview with the *Atlanta Journal Constitution* in relation to Gantt’s attempts to reduce LeCroy’s charge: “Based on her [LeCroy’s] history, I said, ‘No, not at all,’” Ms. Sanders further stated: “I’m his go-to in Morgan County.”

172. According to an *Atlanta Journal-Constitution* report, between 2016 and 2023 Gantt, although not licensed to practice law, was personally involved in at least 82 separate legal matters involving UGA football players.

173. The UGA Athletic Association made a public statement following the subject crash stating that Gantt’s involvement with LeCroy’s ticket “was purely in his personal capacity as a favor to a friend based on his knowledge of traffic court proceedings.”

174. The UGA Athletic Association made a public statement following the subject crash stating: “The university conducted a background check on LeCroy when she was hired full time in 2021, and



its insurance carrier performed a routine check of her driving history in June 2022.”

175. The UGA Athletic Association *admits in a public statement that it* had actual knowledge of at least four of LeCroy’s speeding violations, including two “super speeder” violations, prior to the subject crash.

176. *The UGA Athletic Association had actual and constructive knowledge* of all four of LeCroy’s known speeding violations prior to the subject crash *through its agents, including through Logen Reed’s knowledge, Bryant Gantt’s knowledge*, and the background checks performed by UGA and the UGA Athletic Association’s insurer. See, *CGL Facility Mgmt. v. Wiley*, 328 Ga. App. 727 (2014) and *Ed Sherwood Chevrolet v. McAuley*, 164 Ga. App. 798 (1982).

*177. Prior to January 15, 2023, the UGA Athletic Association had at least one other reason to be aware LeCroy was a habitually reckless driver. In the Spring of 2022, LeCroy, driving an Association golf cart (a street legal vehicle subject to UGA’s vehicle operation policies), in an Association “scavenger hunt” speed contest/race with recruits and guests as passengers, negligently crashed into another staffer’s Association golf cart. The collision caused, upon information and belief, LeCroy and a football recruit’s mother to be thrown out of one or both of the carts, and both carts were extensively damaged. Gantt was involved in the investigation.*

#### **Defendant Carter’s Driving Conduct Prior To The Day of The Championship Celebration**

178. On July 23, 2022, Defendant Carter was cited in the State of Florida for speeding.

179. In 2022, before Defendant Carter received the delivery of the Cherokee Trackhawk (described below), an Ohio dealership provided him with a 2020 Dodge Charger, equipped with a SRT Hellcat V-8 engine capable of speeds of up to 180 mph. “SRT Hellcat” engines are a favorite among illegal street racers.

180. The “SRT” acronym stands for “Street and Racing Technology.”

181. On September 2, 2022, Defendant Carter was pulled over by Athens Clarke County Police for speeding and running a red light, but was only cited by police for running a redlight. On October 13, 2022, with the assistance of Gantt, Defendant Carter pled guilty to the offense and Gantt paid his fine with cash at the counter of the Clerk's office.

182. Between September 2, 2022 and September 22, 2022, the same Ohio dealership provided Defendant Carter with a 2021 Jeep Cherokee *Trackhawk* (curb weight of over 5,300 lbs.) equipped with a 6.2 Liter, SRT, Supercharged 707 Horsepower "Hellcat" V-8 engine with a top speed of 180 mph, and capable of 0 to 60 mph in 3.5 seconds.

183. On September 22, 2022, less than three weeks after Defendant Carter received a ticket for running a red light, he was again ticketed, in Athens, Georgia, for speeding in his recently acquired Cherokee *Trackhawk*-89 mph in 45 mph zone. He also received two tickets for illegal dark tint on both his windshield and front door windows.

184. The Athens-Clarke County police officer citing Defendant Carter on September 22, 2022-as can be heard and seen from the officer's body camera-told him on the scene: "You need to slow down . . . you're not going to jail, that's your break."

185. On October 31, 2022, Defendant Carter pled guilty to the September 22, 2022 offenses.

186. By traveling 89 mph in a 45 mph zone on September 22, 2022, Defendant Carter committed a "super speeder" violation, pursuant to O.C.G.A. § 40-6-189.

187. On November 7, 2022 the State of Florida suspended Defendant Carter's driver's license due to his failure to complete a defensive driving course for the ticket issued on July 23, 2022, and his license remained suspended at the time of the subject crash on January 15, 2023.

### **Defendant Jalen Carter Illegally Left the Scene of the Crash**

188. Defendant Carter, who had no valid driver's license at the time of the crash, initially stopped at the scene and could see "smoke and the car."

189. Despite LeCroy's passenger, Warren McClendon, stating to Defendant Carter that he could not locate Devin Willock, Defendant Carter left the scene after less than 10 minutes when a UGA player at the scene yelled at him: "Yo...hey, JC...you might want to go ahead and go get the f\*\*\* on yo...." (as can be heard in the background of Willock's iPhone automated "911" call).

190. While Defendant Carter has maintained that he was cleared to leave the scene, his criminal attorney, Kim T. Stephens, (in a media interview), stated: "It was somebody who he knew to have authority . . . I don't know if it was directly from law enforcement."

191. Defendant Carter did not return to the scene of this fatal crash until more than an hour and a half after it occurred, and only when Gantt, UGA Athletic Association's liaison between the UGA football program and law enforcement, from the crash scene, called and/or texted him and summoned him back to the scene of the crash at the request of the Athens-Clarke County Police Department.

192. Gantt not only came to the scene of the subject crash shortly after it occurred but also, even though not an attorney, was present when law enforcement officials interviewed various UGA football players about the events of the crash.

193. Defendant Carter violated O.C.G.A. § 40-6-270 (which can qualify as a felony offense) by leaving the scene of the crash and knowingly failing to render any aid or assistance to LeCroy, Mr. Willock or Ms. Bowles, each of whom would have been expected to suffer significant bodily injuries, if not death, as a result of the high speed crash.

194. Defendant Carter committed an additional offense under O.C.G.A. § 40-6-270 by leaving

the scene of the crash without providing his name, address, his vehicle registration number, and his driver's license.

195. Defendant Carter, at the time of leaving the scene, recognized that being publicly implicated in a street racing event resulting in severe injuries and the likely deaths of crash victims would negatively impact his NFL draft status and, therefore, his financial future.

**Plaintiff Victoria S. Bowles Was Not Negligent**

196. Plaintiff Victoria S. Bowles was not negligent in any manner to causing said crash.

197. At some point after the LeCroy SUV turned onto Barnett Shoals Road, Ms. Bowles became concerned about LeCroy's excessive speed-which was not initially readily appreciable to her due to her backseat position in the large SUV and outside darkness.

198. Ms. Bowles expressed concern about LeCroy's driving, but her concern was ignored.

199. The distance between the turn onto Barnett Shoals Road and the scene of the crash was approximately one mile.

200. As LeCroy's SUV and Defendant Carter's SUV were side-by-side when they reached the "76" station on Barnett Shoals Road, their average speed to the "76" station from the turn onto Barnett Shoals Road would have been nearly identical.

201. While the exact speeds of LeCroy's and Defendant Carter's vehicles are not known between their turn onto Barnett Shoals Road and before reaching the "76" station (at which point they were traveling over 99 mph), with estimated speed/distance calculations, LeCroy's SUV would have traveled on Barnett Shoals Road an estimated 45 seconds or less before the crash.

202. Ms. Bowles had only a brief time to react and protest (which she did) once LeCroy's large SUV reached a dangerous speed on Barnett Shoals Road.

### **Injuries, Disability and Damages Sustained by Plaintiff Victoria S. Bowles**

203. As a direct and proximate result of the subject crash, Plaintiff Victoria S. Bowles sustained approximately **twenty fractures**, including: fracture of the transverse process of a cervical vertebra; fracture of the C-6 vertebra; fracture of transverse process of a thoracic vertebra; a “burst fracture” of the fifth lumbar vertebra; a “burst fracture” of the fourth lumbar vertebra; a “burst fracture” of the second lumbar vertebra; fracture of transverse process of a lumbar vertebra; a wedge compression fracture of the T-12 vertebra; fracture of the left clavicle; fracture of the sacrum (a bone important, in part, for hip stability); and approximately ten bilateral rib fractures.

204. According to medical literature, a burst fracture is a traumatic spinal injury in which a vertebra breaks from a high-energy axial load (e.g. a high speed vehicle crash), with shards of vertebra (being pushed backwards) penetrating surrounding tissues. The term “burst” implies that the margins of the vertebral body are spread out in all directions. A burst fracture results in a permanent decrease in anterior height and possible changes in neurological signal intensity with possible deterioration over time. By crushing the entire margin of the vertebral body, the spine is much less stable than following a compression fracture.

205. As a direct and proximate result of the subject crash, and, upon information and belief, as the result of her numerous spinal fractures, Plaintiff Victoria S. Bowles’ medical records establish that she sustained “complex dural injuries throughout the lumbar spine with significant arachnoiditis, CSF extravasation [leakage of cerebrospinal fluid].”

206. Arachnoiditis, according to medical literature, is a rare pain disorder caused by damage to the spinal cord resulting in inflammation of the arachnoid, one of the membranes that surrounds the nerves of the spinal cord. The condition is associated with neurological symptoms, with severe pain, including severe stinging and “burning pain” in her lower extremities, and foot drop syndrome, all of

which Ms. Bowles has sustained. There is no cure for arachnoiditis, which is normally classified as being a chronic and permanent lifelong condition, which may be progressive.

207. According to medical literature, when arachnoiditis progresses, it can lead to the formation of scar tissue and cause the spinal nerves to stick together and malfunction. This leads to “chronic adhesive arachnoiditis.” Many people with this condition eventually need to use a wheelchair due to paralysis.

208. As a direct and proximate result of the subject crash, Ms. Bowles further sustained, including but not limited to, *lacerations on both kidneys*; a liver laceration; a pneumothorax (collapsed lung) of her left lung; traumatic hemoperitoneum (intra-abdominal hemorrhage); *initial low blood pressure of 66/40*; facial lacerations; fractured and cracked teeth; and injury to her jaw.

209. As a direct and proximate result of the subject crash, Ms. Bowles also sustained a closed head injury, and *eye pain-which, according to medical literature, can be the result of neurological damage that can be caused by a build-up of spinal fluid as the result of arachnoiditis.*

210. As a direct and proximate result of the subject crash, Ms. Bowles has incurred medical expenses to date in an amount not less than \$171,595.08, and will continue to incur future and ongoing expenses for medical treatment, rehabilitation, and attendant care as a result of the subject crash.

211. At the time of the crash, Ms. Bowles was paid \$429.33 bi-weekly (less than \$12,000.00 per year) as an UGA recruiting analyst. (LeCroy worked nearly identical bi-weekly hours as Ms. Bowles, and according to the UGA Athletic Association’s statement was “full-time”). As a direct and proximate result of the subject crash, to date Ms. Bowles has lost income totaling at least **\$8,800.00**, and remains unable to work.

212. As a direct and proximate result of the subject crash, upon information and belief, Ms.

Bowles has suffered a diminution in earnings capacity due to her likely permanent disability, and will sustain future lost wages.

213. As a direct and proximate result of the subject crash, Ms. Bowles has sustained physical and emotional pain and suffering, and will continue to sustain physical and emotional pain and suffering likely for the remainder of her life.

**COUNT I**  
**NEGLIGENCE: UGA ATHLETIC ASSOCIATION**

214. Plaintiff hereby incorporates and adopts by reference the previous paragraphs of this Amended Complaint as if fully and completely set forth herein.

215. Defendant UGA Athletic Association, prior to entrusting the subject black rental SUV to LeCroy on January 14, 2023, was aware that LeCroy's customary activities while using UGA Athletic Association vehicles involved the transport of UGA football program staff, UGA football program recruits/prospects, including recruits/prospects under the age of eighteen, as well as their families and others, on a regular basis at all hours of the day during official and unofficial recruitment visits.

216. Defendant UGA Athletic Association, prior to entrusting the subject black rental SUV to LeCroy for use over the Championship Celebration weekend, was aware through its own periodic review of her driving history, as well as the actual knowledge of its agents Gantt and Logen Reed, of LeCroy's deplorable driving history and habitual operation of motor vehicles at high and unsafe speeds.

217. Defendant UGA Athletic Association, prior to entrusting the subject black rental SUV to LeCroy over the Championship Celebration weekend, had knowledge that LeCroy had received multiple speeding tickets, including at least two "super speeder" tickets, one of which was issued to

LeCroy on October 30, 2022 while returning from the Georgia-Florida Game with her direct supervisor in the vehicle.

218. Based upon UGA Athletic Association's "Program Coordinator II/Director of Player Support and Operations," Bryant Gantt's, attempt to intervene to reduce LeCroy's October 2022 "super speeder" traffic ticket, LeCroy was left with the understanding that the Association would continue to intervene on her behalf in an attempt to reduce the consequences of future high speed driving that endangered the public.

*219. Prior to January 15, 2023, the UGA Athletic Association had at least one other reason to be aware that LeCroy was a habitually reckless driver. In the Spring of 2022, LeCroy, driving an Association golf cart (a street legal vehicle subject to UGA's vehicle operation policies), in an Association "scavenger hunt" speed contest/race with recruits and guests as passengers, negligently crashed into another staffer's Association golf cart, and was reprimanded by the Association. The collision caused, upon information and belief, LeCroy and a football recruit's mother to be thrown out of one or both of the carts, and both carts were extensively damaged. Gantt was involved in the investigation of the event.*

*220. With Defendant UGA Athletic Association's prior knowledge of LeCroy's multiple speeding tickets, including at least two "super speeder" tickets, as well as knowledge of LeCroy's negligently caused golf cart collision, the Association was aware that LeCroy was not reasonably suited for the particular position as a recruiting analyst, a position regularly requiring the transporting of recruits and their guests.*

*221. Given the Defendant UGA Athletic Association's prior knowledge of LeCroy's multiple speeding tickets, including at least two "super speeder" tickets, as well as knowledge of LeCroy's negligently caused golf cart collision, the Association negligently entrusted the subject black*



*rental SUV to LeCroy on January 14, 2023, and negligently granted her permission to have possession and use of the subject vehicle on January 15, 2023 at the time of the crash.*

222. Based upon its negligent entrustment of the subject black rental SUV, Defendant UGA Athletic Association is liable to Ms. Bowles for the injuries and damages that she sustained as a result of the high speed crash that occurred on January 15, 2023 while the vehicle was permissively entrusted to LeCroy for her use, *including personal use*, over the course of the weekend of the Championship Celebration.

223. Ms. Bowles is entitled to recover against all Defendants for her special and general damages which include, medical expenses totaling at least \$171,595.08 through the time of filing of this Amended Complaint, future medical expenses, lost wages totaling at least **\$8,800.00** through the time of filing of this Amended Complaint, future lost wages, damages due to diminished capacity to work or labor, physical disability, past, present and future mental and physical pain and suffering, and bad faith damages (for Ms. Bowles' attorney's fees and expenses of litigation) pursuant to O.C.G.A. § 13-6-11, as well as all other damages permitted by law, in an amount to be proven at trial.

**COUNT II**  
**NEGLIGENCE & GROSS NEGLIGENCE: DEFENDANT JALEN CARTER**

224. Plaintiff hereby incorporates and adopts by reference the previous paragraphs of this Amended Complaint as if fully and completely set forth herein.

225. *As a result of LeCroy and Defendant Carter negligently and intentionally acting in concert, both the Estate of LeCroy and Defendant Carter are jointly and severally liable for Ms. Bowles' personal injuries and damages for their joint undertaking, street racing, tandem driving, and joint enterprise at the time of the crash on January 15, 2023. See, FDIC v. Loudermilk, 305 Ga. 558 (2019). (Georgia's apportionment of damages statute, O.C.G.A. § 51-12-33, does not*

*abrogate Georgia's common-law rule imposing joint and several liability on tortfeasors who act in concert insofar as a claim "traditionally understood at common law within the context of torts").*

226. Defendant Jalen Carter is liable to Ms. Bowles for failing to exercise ordinary care and diligence and was careless and grossly negligent in the following respects, including but not limited to:

(a) By engaging in reckless driving, and tandem driving/street racing with LeCroy (a grossly negligent joint enterprise) on Barnett Shoals Road, a public highway in Athens-Clarke County, Georgia. (See, *Price v. Thapa*, 323 Ga. App. 638 (2013); a driver is liable even if his vehicle was not directly involved in the crash if his negligence is so closely related to the other driver's negligence as to speed);

(b) By driving at dangerous and extraordinarily high speeds (59 mph or greater over the posted speed limit) during the street race that occurred on Barnett Shoals Road while in route to the *Waffle House* on Barnett Shoals Road;

(c) By pursuing LeCroy while she was driving the UGA Athletic Association rental SUV while engaged in a street race with LeCroy on Barnett Shoals Road; and

(d) In driving too fast for conditions during the street race.

227. Ms. Bowles is entitled to recover against Defendant Carter for special and general damages, which includes medical expenses totaling at least \$171,595.08 through the time of filing this Amended Complaint, lost wages totaling at least **\$8,800.00** through the time of filing this Amended Complaint, future lost income, damages due to diminished capacity to work or labor, physical disability, past, present and future mental and physical pain and suffering, extreme emotional distress, and bad faith damages (for Ms. Bowles' attorney's fees and expenses of litigation) pursuant to O.C.G.A. § 13-6-11, as well as all other damages permitted by law, in an

amount to be proven at trial.

**COUNT III**  
**NEGLIGENCE & GROSS NEGLIGENCE: CHANDLER LECROY**

228. Plaintiff hereby incorporates and adopts by reference the previous paragraphs of this Amended Complaint as if fully and completely set forth herein.

229. *As a result of LeCroy and Defendant Carter negligently and intentionally acting in concert to engage in a street race, both the Estate of LeCroy and Defendant Carter are jointly and severally liable for Ms. Bowles' damages. See, FDIC v. Loudermilk, 305 Ga. 558 (2019).*

230. The Estate of Chandler LeCroy, by and through Robert W. Hughes in his representative capacity as the Court-Appointed Personal Administrator of the Estate of Chandler LeCroy (deceased), is liable to Ms. Bowles for LeCroy's failure to exercise ordinary care and diligence and who was careless and grossly negligent in the following respects, including but not limited to:

(a) By engaging in tandem driving/street racing with Defendant Carter (a grossly negligent joint enterprise) upon the public highways of Athens-Clarke County, Georgia;

(b) By driving at dangerous and extraordinarily high speeds (more than 60 mph over the posted speed limit) during the street race that occurred on Barnett Shoals Road;

(c) In driving too fast for conditions during the street race;

(d) In failing, after Ms. Bowles protested, to slow down while driving the leased UGA Athletic Association vehicle to a safe and legal speed and to refrain from racing the vehicle and driving in a reckless manner, and:

(e) By operating a motor vehicle without disclosing to her passengers that she was impaired by alcohol.

231. Ms. Bowles is entitled to recover against the Estate of LeCroy for special and general

damages which include, medical expenses totaling at least \$171,595.08 through the time of filing this Amended Complaint, lost wages totaling at least **\$8,800.00** through the time of filing this Amended Complaint, future lost income, damages due to diminished capacity to work or labor, physical disability, past, present and future mental and physical pain and suffering, extreme emotional distress, and bad faith damages (for Ms. Bowles' attorney's fees and expenses of litigation) pursuant to O.C.G.A. § 13-6-11, as well as all other damages permitted by law, in an amount to be proven at trial.

**COUNT IV**  
**NEGLIGENCE AND GROSS NEGLIGENCE: DEFENDANT BREADMAN JALEN, LLC**

232. Plaintiff hereby incorporates and adopts by reference the previous paragraphs of this Amended Complaint as if fully and completely set forth herein.

233. Defendant Breadman Jalen, LLC was the owner of the vehicle being driven by Defendant Carter on January 15, 2023 and is for all purposes the alter ego of Defendant Carter as it relates to the events occurring on January 15, 2023 giving rise to this Complaint.

234. Defendant Breadman Jalen, LLC was negligent in entrusting the subject Jeep *Trackhawk* being driven by Defendant Carter to him based upon its knowledge of Defendant Carter's driving history and propensity to engage in aggressive driving behavior and driving at extreme speeds.

235. Defendant Breadman Jalen, LLC is vicariously liable for the injuries and damages incurred by Ms. Bowles as set forth herein above.

236. *As a result of LeCroy and Defendant Carter negligently and intentionally acting in concert to engage in a street race, both the Estate of LeCroy and Defendant Breadman Jalen, LLC are jointly and severally liable for Ms. Bowles' damages. See, FDIC v. Loudermilk, 305 Ga. 558 (2019).*

237. As a direct and proximate result of the negligent actions of Defendant Breadman Jalen, LLC, Ms. Bowles is entitled to an award for special and general damages which include, medical expenses totaling at least \$171,595.08 through the time of filing this Amended Complaint, lost wages totaling at least **\$8,800.00** through the time of filing this Amended Complaint, future lost income, damages due to diminished capacity to work or labor, physical disability, past, present and future mental and physical pain and suffering, extreme emotional distress, and bad faith damages (for Ms. Bowles' attorney's fees and expenses of litigation) pursuant to O.C.G.A. § 13-6-11, as well as all other damages permitted by law, in an amount to be proven at trial.

**COUNT V**  
**PUNITIVE DAMAGES**

238. Plaintiff hereby incorporates and adopts by reference the previous paragraphs of this Amended Complaint as if fully and completely set forth herein.

239. The conduct of each Defendant named below, as more fully set forth herein above, authorizes the imposition of punitive damages against each named Defendant pursuant to O.C.G.A. § 51-12-5.1 in that the conduct of each named Defendant serves to demonstrate and amount to willful misconduct, wantonness, oppression, or that entire want of care which would raise the presumption of a conscious indifference to the consequences. See, O.C.G.A. § 40-6-270; *Battle v Kilcrease*, 54 Ga. App. 808 (1936); *Langlois v. Wolford*, 246 Ga. App. 209 (2000).

**Defendant UGA Athletic Association**

240. The conduct of the UGA Athletic Association in entrusting the black rental SUV to LeCroy when it had actual knowledge of LeCroy's habitually reckless conduct while driving, with knowledge of at least four prior speeding tickets, including two "super speeder" tickets, as well as the attempts by and through its agent to reduce or mitigate LeCroy's speeding tickets is sufficient to

demonstrate and amount to willful misconduct, wantonness, oppression, or that entire want of care which would raise the presumption of a conscious indifference to the consequences authorizing the imposition of punitive damages against Defendant UGA Athletic Association pursuant to O.C.G.A. § 51-12-5.1.

### **Defendant Carter**

241. The conduct of Defendant Carter in engaging in tandem driving/street racing with LeCroy on Barnett Shoals Road, driving at extremely dangerous and extraordinarily high speeds (59 mph or more over the posted speed limit) during the street race that occurred on Barnett Shoals Road in route to the *Waffle House* on Barnett Shoals Road, are individually and collectively sufficient to demonstrate and amount to willful misconduct, wantonness, oppression, or that entire want of care which would raise the presumption of a conscious indifference to the consequences authorizing the imposition of punitive damages against Defendant Carter pursuant to O.C.G.A. § 51-12-5.1.

242. The conduct of Defendant Carter during the events described above, in leaving the scene of the crash, with knowledge he was a joint bad actor in causing the crash, was in violation of O.C.G.A. § 40-6-270(a)(1)(2), and his failure to render aid to Ms. Bowles, LeCroy and Devin Willock (as the result of his failure to determine their location on the scene and their physical condition) in violation of O.C.G.A. § 40-6-270(a)(3), on its own, authorizes the imposition of punitive damages against Defendant Carter pursuant to O.C.G.A. § 51-12-5.1.

243. Defendant Carter's leaving the scene of the crash without even attempting to speak to Ms. Bowles and the other occupants, as mandated by statute, was an intentional and culpable act; such conduct demonstrating a conscious indifference to the consequences and an entire want of care as to Ms. Bowles' and the other occupants' well-being. See, *Langlois v. Wolford*, 246 Ga. App. 209 (2000).

244. Defendant Carter's leaving the scene of the crash without even attempting to speak to Ms. Bowles, LeCroy and Devin Willock gives rise to the reasonable inference that his flight was from a sense of guilt. See, *Parker v State*, 232 Ga. App. 609 (1998).

245. Defendant Carter, at the time of leaving the scene, recognized that being publicly implicated in a street racing event resulting in severe injuries and the likely deaths of crash victims would negatively impact his NFL draft status and, therefore, his financial future. Thus, he had not only an interest to avoid both civil and criminal liability, but also to protect his NFL draft status by leaving the scene of the crash. See, *Langlois v. Wolford*, 246 Ga. App. 209 (2000).

246. Accordingly, Defendant Carter's conduct in leaving the scene of the crash, standing alone, authorizes the imposition of punitive damages against Defendant Carter pursuant to O.C.G.A. § 51-12-5.1.

247. Defendant Carter's prior speeding history, including at least one "super speeder" violation, standing alone, authorizes the imposition of punitive damages against Defendant Carter pursuant to O.C.G.A. § 51-12-5.1.

248. Ms. Bowles is entitled to an award of punitive damages against each named Defendant as identified in this Count in an amount to be determined by the enlightened conscience of a fair and impartial jury.

**COUNT VI**  
**Attorneys' Fees Under O.C.G.A. § 13-6-11**

249. Plaintiff repeats, reiterates and re-alleges each and every allegation contained in this Amended Complaint with the same force and effect as if fully set forth herein.

250. The Defendants in this action have acted in bad faith, have been stubbornly litigious, and have caused Ms. Bowles unnecessary trouble and expense as provided under Georgia law.

Accordingly, Ms. Bowles is entitled to recover her reasonable attorney's fees and expenses of litigation as provided under O.C.G.A. § 13-6-11 in an amount to be proven at trial.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Victoria S. Bowles prays:

- (a) That the Complaint and summons be served upon the Defendants as required by law;
- (b) That, pursuant to Count I of this Complaint, a judgment be entered against Defendant UGA Athletic Association and in favor of Plaintiff Victoria S. Bowles for all general damages permitted under Georgia law in an amount to be proved at trial as well as for all special damages, for lost income and diminution in earnings capacity, in an amount to be proved at trial, and for past, present and future medical expenses in an amount not less than \$171,595.08;
- (c) That, pursuant to Count II of this Complaint, a judgment be entered against Defendant Jalen Carter and in favor of Plaintiff Victoria S. Bowles for all general damages permitted under Georgia law in an amount to be proven at trial as well as for all special damages, for lost income and diminution in earnings capacity, in an amount to be proved at trial, and for past, present and future medical expenses in an amount not less than \$171,595.08;
- (d) That, pursuant to Count III of this Complaint, a judgment be entered against Chandler LeCroy by and through the representative of her Estate and in favor of Plaintiff Victoria S. Bowles for all general damages permitted under Georgia law in an amount to be proven at trial as well as for all special damages, for lost income and diminution in earnings capacity, in an amount to be proved at trial, and for past, present and future medical expenses in an amount not less than \$171,595.08;
- (e) That, pursuant to Count IV of this Complaint, a judgment be entered against Defendant Jalen Breadman LLC and in favor of Plaintiff Victoria S. Bowles for all general damages permitted under Georgia law in an amount to be proven at trial as well as for all special damages, for lost



income and diminution in earnings capacity, in an amount to be proved at trial, and for past, present and future medical expenses in an amount not less than \$171,595.08;

(f) That a judgment be entered against each Defendant named in Count V and in favor of Plaintiff Victoria S. Bowles for punitive damages, pursuant to O.C.G.A. § 51-12-5.1, in an amount to be determined by the enlightened conscience of a fair and impartial jury;

(i) That, pursuant to Count VI Plaintiff Victoria S. Bowles recover her attorney's fees and expenses of litigation against all named Defendants under the provisions of O.C.G.A. § 13-6-11, as well as permitted by law, in an amount to be proven at trial;

(j) That Plaintiff have a trial by jury; and

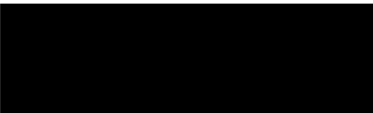
(k) That Plaintiff have other and further relief as this Honorable Court deems legal, just, and equitable.

RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of January, 2024.

/s/ Robert C. Buck  
Robert C. Buck  
Georgia Bar No. 092495

BUCK LAW FIRM 

P.O. Box 921429  
Peachtree Corners, Georgia 30010-1429



/s/ J. Phillip Boston  
J. Phillip Boston  
Georgia Bar No. 069525

Law Office of J. Phillip Boston  
P.O. Box 8084



*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the foregoing document on all parties/counsel of record electronically via Odyssey eFile GA, via email, or via U.S. Mail (First Class Postage):

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*Counsel for Defendant Estate of Chandler LeCroy*

This 11<sup>th</sup> day of January, 2024

/s/ Robert C. Buck  
Robert C. Buck  
Georgia Bar No. 092495  
*Counsel for Plaintiffs*



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