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February 27, 2026

Via Personal Service

City of Phoenix
City Clerk Department
200 W. Washington Street, 15th Floor
Phoenix, Arizona 85003

Chief Matt Giorano
Phoenix Police Department
620 W. Washington Street
Phoenix, Arizona 85003

Mayor Kate Gallego
City of Phoenix
200 W. Washington Street, 11th Floor
Phoenix, Arizona 85003

Phoenix Risk Management Division
251 W. Washington Street, Suite 8
Phoenix, Arizona 85003

Officer Genner Cervantes, Jr., #11702
Phoenix Police Department
620 W. Washington Street
Phoenix, Arizona 85003

Officer Thomas Patterson, #11688
Phoenix Police Department
620 W. Washington Street
Phoenix, Arizona 85003

Officer Ricky Toole, #11827
Phoenix Police Department
620 W. Washington Street
Phoenix, Arizona 85003

Officer Nathan Epps, #11792
Phoenix Police Department
620 W. Washington Street
Phoenix, Arizona 85003

Re: Israel DeVoe

**NOTICE OF CLAIM
Pursuant to A.R.S. § 12-821.01**

Greetings:

We represent Israel DeVoe. We are writing to provide you with his notice of claim related to the incident on November 3, 2024, in which Phoenix police officers Thomas Patterson, Nathan Epps, and Ricky Toole attacked and beat Israel. After they attacked Israel, Officers Patterson, Epps, Toole, and Cervantes falsified reports leading to Israel's wrongful incarceration and subsequent felony prosecution.

This letter is a notice of claim pursuant to A.R.S. § 12-821.01. The purpose of this letter is to provide notice to the City of Phoenix and Officers Patterson, Epps, Toole, and Cervantes of Mr. DeVoe's claims against them, the factual basis for those claims, and the sum certain for which Mr. DeVoe is willing to resolve those claims.

I. Factual background.

a. The events leading up to Officer Patterson, Epps, and Toole's attack on Israel DeVoe.

On November 3, 2024, at approximately 2346 hours, Israel and his employee were driving to a job site. Both men are African American. The pair was traveling eastbound on Indian School Road when Officers Patterson and Cervantes initiated a traffic stop for allegedly speeding. Israel complied with the traffic stop and pulled over to the side of the road.

At the time of the attack, Israel was employed as a supervisor with Allied Universal and was driving his company vehicle, as evidenced by the lightbar on top of the vehicle and the "Allied Universal" logo on the side:

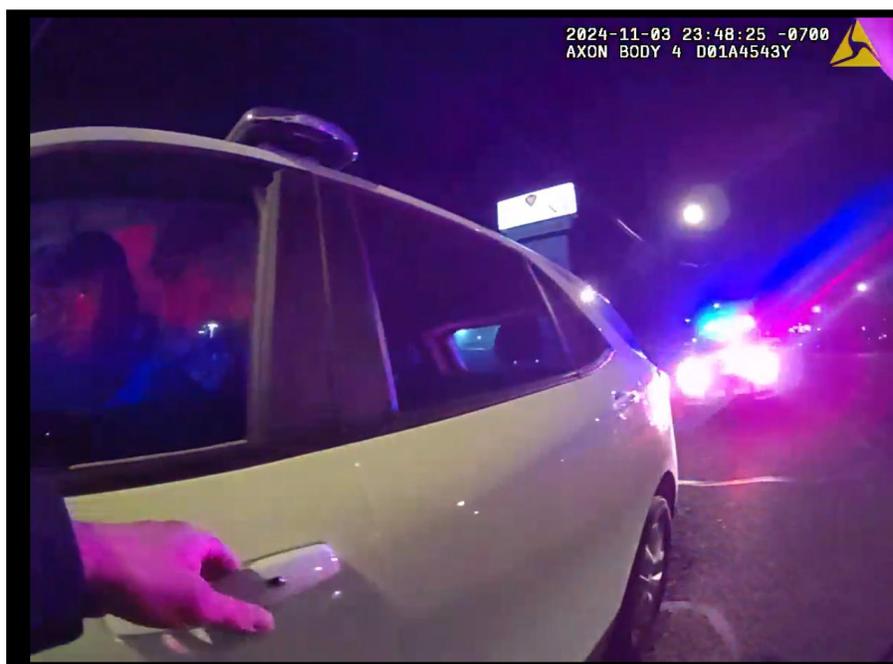


Officer Patterson approached Israel, and Officer Cervantes approached the passenger. The following is captured on Officer Patterson's body-worn camera ("BWC"):

At the 1:15 minute mark of the video, Officer Patterson arrived at Israel's window and immediately asked if he had any guns in the car, to which Israel stated, "Oh, no." Patterson remarked that they were "flying" down Indian School.

At 1:27, Israel informed him that he worked for Allied and worked with security.

The pair had further discussions about Israel's alleged speed, and at 2:32, Israel asked Patterson how fast he was going. This appeared to anger Patterson, who immediately began issuing a string of conflicting, rapid-fire commands without giving Israel a chance to comply. First, Patterson demanded Israel's driver's license. While Israel was attempting to retrieve his driver's license and comply, Patterson issued a new command - "Actually, we're gonna have you step out of the vehicle, okay?" and opened Israel's car door:



Seconds later, Officer Patterson issued a new command and instructed Israel to put his hands on top of his head. Israel was still seated in the car, had his seatbelt on, and was holding a water bottle. It was impossible for Israel to simultaneously comply with all three of these commands.

While Israel attempted to comply with Patterson's contradictory and impossible commands, Patterson shouted, "Hands on top of your head," and physically attacked Israel.

b. Officer Patterson, Cervantes, Epps, and Toole's false claims.

In their written police reports and during their trial testimony, the officers claimed that Israel assaulted them in several ways. They also specifically, and falsely, claimed that he used a variety of methods "consistent with jiu jitsu."

According to Epps:

"THE SUBJECT WAS ABLE TO UTILIZE MANY TECHNIQUES CONSISTENT WITH JUJITSU SUCH AS A LEG LOCK, WRIST LOCKS, SWIMMING OUT OF GRIPS, AND SHRIMPING OUT OF MOUNTS."

He continued:

"ALSO IN MY EXPERIENCE WITH MARTIAL ARTS, HE WAS WEARING A JIU-JITSU GI WHICH IS COMMONLY WORN BY PEOPLE WHO ARE WELL-VERSED IN MARTIAL ARTS SPECIFICALLY BRAZILIAN JIU-JITSU. TYPICALLY IN THE MARTIAL ARTS WORLD SPECIFIC ITEMS OF CLOTHING ARE EARNED THROUGH WHAT CAN BE CONSIDERED AS A RITE OF PASSAGE OR ADVANCED TRAINING."

All of these assertions were fabrications invented by the officers to cover up for their unprovoked physical attack on Israel.

Based on the false testimony Officer Cervantes gave to the grand jury on December 20, 2024, Israel was indicted on three counts of aggravated assault on an officer and one count of resisting arrest. Interestingly, Israel was never cited for speeding.

Cervantes testified:

Q. Back on November 3rd of this year at about 11:45 in the evening, Mr. Devo (sic) was going to be taken into custody reference a separate investigation, correct?

A. Correct

Q. What happened when they attempted to take Mr. Devo (sic) into custody?

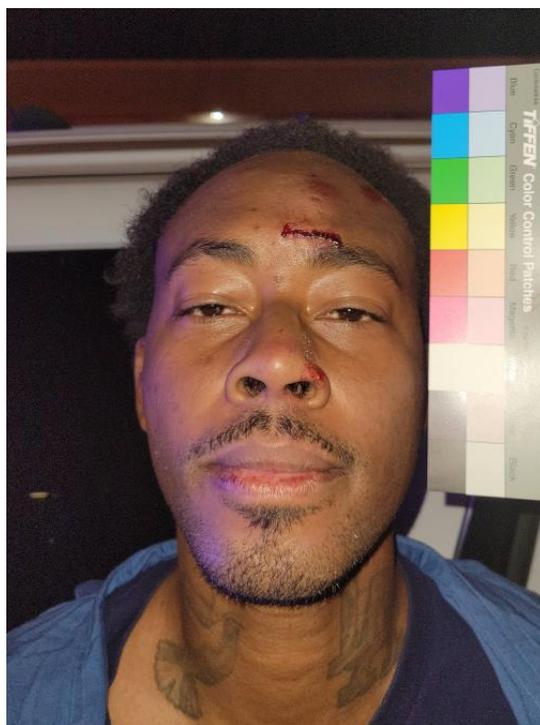
A. He tensed his arms, was not compliant, and would not follow and obey our commands.

Q. Did it evolve into more of a scrum?

- A. Yes.
- Q. Tell us how that happened.
- A. Officer Patterson ordered him to get out of the vehicle and ordered him to place his hands on top of his head, his hands in the air. He became very tense. At that point -- at that point the officers he was resisting, being tense, the officer asked the -- Officer Toole were trying to assist Officer Patterson. At that point it became into a scuffle and lead to them being on the floor. And eventually it became -- it got to the point where he was resisting arrest.

This was false testimony. At no point did Israel resist arrest or do anything that a reasonable officer could construe as posing a threat of any kind. To the contrary, Israel was a victim of an unprovoked and unreasonable attack by Officers Patterson, Epps, and Toole. Those officers, along with Officer Cervantes, conspired to bring false charges against Israel in order to cover their own wrongdoing.

II. Israel's injuries.



As a result of the unjustified assault by Officers Patterson, Epps, and Toole, Israel suffered severe physical, mental, and emotional pain and suffering. As a result of the false charges brought by Officers Patterson, Epps, Toole, and

Cervantes, Israel was falsely arrested and was deprived of his freedom. Because of the felony charges, Israel lost his security job at Allied, where he had worked for nearly 14 years. He also lost his fingerprint card.

Israel's criminal charges, which carried potential prison time, loomed heavily for almost a year, which caused significant distress and uncertainty. Because he was innocent, Israel refused to accept a plea offer and took the matter to trial. On September 8, 2025, a jury found Israel not guilty on all charges.

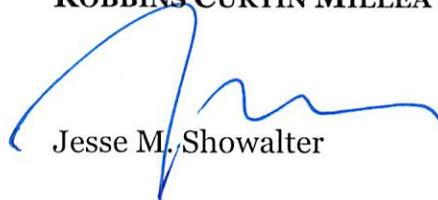
III. Sum Certain.

For the purpose of presenting you with a sum certain demand, we have been given authority to resolve Israel's claims for the sum certain of \$2,500,000.00. Payment of this amount will resolve all claims that Israel could bring against the individual officers and the City of Phoenix, including, but not limited to, claims for wrongful arrest, malicious prosecution, excessive force, negligence, assault, battery, defamation, and intentional infliction of emotional distress.

As required by statute, this offer will remain open for 60 days, at which time it will be deemed rejected.

Very truly yours,

ROBBINS CURTIN MILLEA & SHOWALTER, LLC



Jesse M. Showalter

JMS:jwm