

IN THE SUPERIOR COURT OF RICHMOND COUNTY
AUGUSTA JUDICIAL CIRCUIT
STATE OF GEORGIA

FARRAH HEMBREE, as surviving heir of
TERESA INGRAM, deceased,

and

TOMMY WILLIAMS, as surviving heir of
REXTAL WILLIAMS, deceased,
Plaintiffs,

V.

RICHMOND COUNTY, GEORGIA;
RICHMOND COUNTY FIRE
DEPARTMENT; FIRE STATION 16; CHIEF
ANTONIO BURDEN, individually and in his
official capacity as Chief of the Richmond
County Fire Department; THE STATE OF
GEORGIA; and JOHN DOE EMPLOYEES
1-10, in their individual and official
capacities,
Defendants.

CIVIL ACTION FILE NO.:
2025RCCV00862

**AMENDED COMPLAINT FOR WRONGFUL DEATH,
NEGLIGENCE, AND VIOLATION OF MINISTERIAL
DUTIES**

COMES NOW, the Plaintiffs, **FARRAH HEMBREE**, in her individual capacity and as surviving heir of **TERESA INGRAM**, deceased, and **TOMMY WILLIAMS**, in his individual capacity and as surviving heir of **REXTAL WILLIAMS**, deceased, by and through undersigned counsel, and file this Amended Complaint against the above-named Defendants, showing the Court as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff **FARRAH HEMBREE** is a resident of Columbia County, Georgia, and the lawful surviving next of kin of **TERESA INGRAM**, deceased.

2. Plaintiff **TOMMY WILLIAMS** is a resident of Richmond County, Georgia, and the lawful surviving next of kin of **REXTAL WILLIAMS**, deceased.

3. Defendant **RICHMOND COUNTY, GEORGIA**, is a political subdivision of the State of Georgia, subject to suit under the Georgia Tort Claims Act (“GTCA”), O.C.G.A. § 50-21-20 et seq., and may be served through the Richmond County Attorney, 530 Greene Street, Augusta, Georgia 30901.

4. Defendant **RICHMOND COUNTY FIRE DEPARTMENT** is an agency of Richmond County responsible for providing fire protection, rescue services, and emergency response to residents of the County, and may be served through its Chief.

5. Defendant **FIRE STATION 16** is a facility and subdivision of the Richmond County Fire Department and is located directly across from the site of the fatal fire at 3443 Old Louisville Road, Augusta, Georgia.

6. Defendant **CHIEF ANTONIO BURDEN** is the acting Fire Chief of the Richmond County Fire Department and may be served in both his individual and official capacities at 3117 Deans Bridge Road, Augusta, Georgia 30906.

7. Defendant **THE STATE OF GEORGIA** is a sovereign entity which exercises oversight and regulatory control over the operation and standards of local emergency and fire response agencies. Service may be made through the Attorney General of Georgia, 40 Capitol Square, Atlanta, Georgia 30334.

8. Defendants **JOHN DOE FIRE DEPARTMENT EMPLOYEES 1-10** are presently unknown firefighters, dispatchers, and/or supervisors whose acts or omissions

contributed to the injuries and deaths alleged herein. Plaintiffs will amend this Complaint to substitute their true names upon discovery.

9. Venue is proper in this Court pursuant to O.C.G.A. § 9-10-30, as the cause of action arose in Richmond County, where the negligent acts and omissions of the defendants occurred.

10. Jurisdiction is proper under the Georgia Constitution, O.C.G.A. § 50-21-23, and applicable case law waiving sovereign immunity for acts of negligence by government employees acting within the scope of employment.

FACTUAL BACKGROUND

11. On October 14, 2023, at approximately 6:24 a.m., a fire erupted in the home shared by Teresa Ingram and Rextal Williams at 3443 Old Louisville Road, directly across from Richmond County Fire Station 16.

12. Both residents awoke to the fire and attempted to escape. They were overcome by smoke and subsequently died of asphyxiation.

13. Prior to the incident, Mr. Williams had established an evacuation plan with personnel at Fire Station 16 due to his limited mobility. Station 16 employees explicitly assured him that in the event of a fire, they would respond immediately to extract him through a designated route. Ms. Ingram relied upon this plan from Station 16.

14. Despite these assurances and the station's proximity, Fire Station 16 failed to respond at all to the fire, even as it occurred within direct visual range of their facility.

15. When later questioned, Fire Station 16 employees admitted they "were asleep" and took no action to assist or respond to the fire. This ministerial failure

16. These failures constitute gross negligence, willful and wanton misconduct, and a violation of established ministerial duties under Richmond County emergency operations protocols.

17. Plaintiffs timely submitted an Ante Litem Notice on October 11, 2024, pursuant to O.C.G.A. § 36-11-1, notifying Richmond County of the claims and demanding settlement in the amount of \$30,000,000.00.

CAUSES OF ACTION

Count I – Negligence

18. Plaintiffs incorporate by reference the preceding paragraphs as if fully set forth herein.

19. Defendants owed a duty of reasonable care to respond promptly to fire emergencies and to perform their operational and ministerial duties with due diligence.

20. Defendants breached this duty by failing to respond to an active house fire directly across from their station, resulting in fatal injuries to the decedents.

21. The failure to act constituted negligence per se and directly and proximately caused the deaths of Teresa Ingram and Rextal Williams.

Count II – Gross Negligence and Willful Misconduct

22. The conduct of Fire Station 16 employees—failing to respond at all to an emergency within their line of sight—constitutes gross negligence and willful disregard for human life.

23. Such conduct exceeds any discretionary authority and is not protected by the Public Duty Doctrine, as specific assurances had been made to the residents, creating a special relationship and individualized duty.

Count III – Wrongful Death

24. Plaintiffs bring this action under O.C.G.A. § 51-4-2, seeking damages for the full value of the lives of Teresa Ingram and Rextal Williams, whose deaths were directly caused by Defendants' negligence and failures to act.

Count IV – Negligent Hiring, Training, and Supervision

25. Defendant Richmond County failed to properly hire, train, supervise, and retain competent fire department employees, thereby allowing grossly negligent conduct to occur.

26. Such failures were a direct and proximate cause of the deaths at issue and constitute independent acts of negligence.

DAMAGES

27. As a direct and proximate result of Defendants' conduct, the decedents suffered conscious pain and suffering prior to death, and their estates have sustained funeral and burial expenses and other consequential losses.

28. Plaintiffs seek compensatory damages in an amount to be determined by a jury, together with costs of litigation, attorney's fees under O.C.G.A. § 13-6-11, and all other relief this Court deems just and proper.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- a) Enter judgment in favor of Plaintiffs and against all Defendants, jointly and severally;
- b) Award compensatory damages for the full value of the lives of Teresa Ingram and Rextal Williams; determined by the enlightened conscience of the Jury not to be less than \$10,000,000.00;
- c) That Plaintiffs be granted a jury to try this case;
- d) Award attorney's fees and expenses of litigation pursuant to O.C.G.A. § 13-6-11; and
- e) Grant such other and further relief as the Court deems just and proper.

Respectfully submitted this 20 October 2025.

/s/ Reid V. Sanders

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