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February 11, 2026

Via Email and Certified Mail
Claims Director: Angela S. Rowe
Lone Star Mutual Insurance
1100 Commerce Street
Dallas, TX 75201

Re: Our Client: Nadia Rahimi
Date of Loss: November 9, 2025
Insured: TriCounty Security Services, LLC (Employee: Todd Kessler)
Claim No.: LSM-TX-771203
Notice of Potential Statutory Claims

Ms. Rowe:

Our firm represents Nadia Rahimi arising from the incident on November 9, 2025 at Lakeside Galleria Mall, Plano, Texas, involving security personnel employed by your insured, TriCounty Security Services, LLC. The purpose of this correspondence is to make a formal demand for settlement and to place Lone Star Mutual on notice of the seriousness of this matter, including potential statutory exposure should this claim be mishandled.

Incident Overview: Willful and Reckless Conduct

This was not an accident. Ms. Rahimi — a 29-year-old nursing student — was leaving the mall when TriCounty’s guard, Todd Kessler, confronted her near the south exit. Without justification, he escalated a routine interaction into a physical altercation.

Multiple witnesses and security footage (already preserved via spoliation notice) show Kessler grabbing Ms. Rahimi, forcibly twisting her arm behind her back, and driving her into a wall before throwing her to the floor. This conduct was reckless, willful, and entirely outside any reasonable security practice.

Pattern and Practice / Systemic Failure

We are not treating this as an isolated “bad moment.” TriCounty’s hiring, training, and supervision failures are obvious and will be explored in discovery. The preliminary information we have already obtained raises red flags consistent with a pattern and practice of excessive force and a systemic failure to train guards on de-escalation, use-of-force limits, and basic public safety.

If Lone Star Mutual and TriCounty intend to minimize this incident as a misunderstanding, they will be making a serious mistake.

Injuries and Medical Treatment

Ms. Rahimi suffered:

- right shoulder injury with persistent instability,
- wrist sprain with ongoing pain,
- cervical strain with headaches,
- significant bruising and abrasions documented the same day.

She presented to Baylor Scott & White – Plano on the date of the incident. Follow-up imaging and orthopedic evaluations were obtained due to continued shoulder pain and reduced range of motion.

Ms. Rahimi has completed physical therapy but continues to report instability and pain when lifting or performing clinical tasks — a major issue given her profession. In addition, she has experienced anxiety, sleep disruption, and fear of public places following the assault. Those effects are well documented in her counseling records.

Damages

Past Medical Bills: \$18,920.00

Counseling / Behavioral Health: \$3,240.00

Past Lost Wages (part-time employment): \$2,110.00

Projected Future Care (orthopedic + therapy): \$12,500.00

Total Current Economic Damages: \$36,770.00

Non-economic damages are substantial here, not only because of the physical injury, but because this was a humiliating and frightening public assault causing emotional harm and disruption to her career path.

Damages Sought and Legal Exposure

This matter includes claims for:

- **Compensatory damages (medical, wage loss, pain and suffering, loss of normal life),**
- **Emotional distress damages (anxiety, humiliation, sleep disruption),**
- **Attorneys' fees where recoverable under applicable statutory provisions,**
- **and Punitive damages based on willful, malicious, or grossly negligent conduct and the systemic failures described above.**

We are also evaluating additional remedies and penalties that may apply depending on TriCounty's licensing compliance, incident reporting, and Lone Star Mutual's handling of this claim.

Settlement Demand / Deadline

To resolve this matter pre-suit, we demand \$425,000.00. This demand reflects the seriousness of the misconduct, the continuing impact on Ms. Rahimi's education and work, and the very real risk of a punitive verdict if this proceeds to litigation.

Please provide a written response by March 4, 2026. If Lone Star Mutual declines to resolve this claim in good faith, we will proceed with filing suit and will pursue discovery into TriCounty's training records, prior incidents, supervision failures, and any corporate policies that contributed to this harm.

Govern yourselves accordingly.

Sincerely,

**/s/ Samuel Montgomery
Samuel Montgomery, Esq.
Montgomery & Saab**

Enclosures: Medical Bills Summary; ER Records; PT Records; Counseling Summary; Witness List; Spoliation Notice