

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TENNESSEE  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

3.29 ACRES OF IMPROVED LAND, MORE OR LESS, SITUATED IN THE CITY OF CHATTANOOGA, HAMILTON COUNTY, TENNESSEE; PROVIDENT LIFE & ACCIDENT INSURANCE COMPANY, A TENNESSEE CORPORATION; BRIGHT BASE LLC, A TENNESSEE CORPORATION; OFFICE OF THE CITY TREASURER OF CHATTANOOGA; AND HAMILTON COUNTY TRUSTEE,

Defendants.

No. \_\_\_\_\_

**COMPLAINT IN CONDEMNATION WITH DECLARATION OF TAKING**

1. This is a civil action brought by the United States of America, at the request of the General Services Administration of the United States of America, for the taking of property in Chattanooga, Tennessee, under its power of eminent domain and through a Declaration of Taking, and for the determination of an award of just compensation to the owners and parties in interest.

2. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1338. The Court has venue under 28 U.S.C. § 1403.

3. The authority for the acquisition is set forth in Schedule A of the Declaration of Taking, which is attached hereto and made a part hereof.

4. The public purpose for which said property is taken is set forth in Schedule B of the Declaration of Taking, which is attached hereto and made a part hereof.

5. A legal description of the property taken is set forth in Schedule C of the Declaration of Taking, which is attached hereto and made a part hereof.

6. A map showing the property taken is set forth in Schedule D of the Declaration of Taking, which is attached hereto and made a part hereof.

7. A description of the estate taken is set forth in Schedule E of the Declaration of Taking, which is attached hereto and made a part hereof.

8. The estimate of just compensation is stated in Schedule F of the Declaration of Taking, which is attached hereto and made a part hereof.

9. The names and addresses of known parties that may have or claim an interest in said property are set forth in Schedule G of the Declaration of Taking, which is attached hereto and made a part hereof.

WHEREFORE, Plaintiff United States of America requests judgment that the property and interests be condemned, that just compensation for the taking be ascertained and awarded, and that the Court award such other relief as may be lawful and proper.

DATED: February 13, 2026

Respectfully submitted,

ADAM R.F. GUSTAFSON  
Principal Deputy Assistant Attorney General

/s/ Seth A. Mohney

Seth A. Mohney  
Trial Attorney, U.S. Department of Justice  
Environment and Natural Resources Div.  
P.O. Box 7611 – Ben Franklin Station  
Washington, D.C. 20044  
Tel: (202) 353-5371  
Fax: (202) 353-7763  
seth.mohney@usdoj.gov

*Attorneys for Plaintiff United States*

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UNITED STATES OF AMERICA,

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Defendants.

No. \_\_\_\_\_

**DECLARATION OF TAKING**

I, Andrew Heller, Acting Commissioner, Public Buildings Service, General Services Administration of the United States of America, pursuant to the authority delegated to the Office of the Commissioner by the Administrator of General Services in Chapter 5, paragraph 2.d, Part 1 (GSA Order PBS 5450.2, August 5, 2020) of the GSA Delegations of Authority Manual (ADM P 5450.39D CHGE 1, April 5, 2022), do hereby declare that:

1. The authority for the acquisition of the property taken is set forth in Schedule A.
2. The public use for which the property is taken is set forth in Schedule B.
3. The legal description of the property taken is set forth in Schedule C.
4. A survey and photo showing the property being taken are set forth in Schedule D.

5. The estate taken in the property is set forth in Schedule E.

6. The sum estimated by me as just compensation for the taking is set forth in Schedule F, which sum I cause to be deposited herewith in the registry of the Court for the use and benefit of the persons entitled thereto. I am of the opinion that the ultimate award for the taking will be within any limits imposed by law on the price to be paid therefor.

7. The parties who have or may claim an interest in the property are set forth in Schedule G.

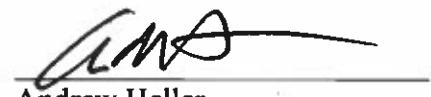
8. The United States of America made best efforts to negotiate acquisition of the interests sought prior to filing this condemnation action.

I, Andrew Heller, Acting Commissioner of the Public Buildings Service of the General Services Administration, state and declare that the property rights acquired are taken in the name of and for the use of the United States of America under authority and for the public purpose stated herein.

**IN WITNESS WHEREOF**, the United States of America, by its Administrator of General Services has authorized and caused this Declaration to be signed in its name by me, as Acting Commissioner, Public Buildings Service, General Services Administration, this 13<sup>th</sup> day of February, 2026, in the City of Washington, District of Columbia.

**UNITED STATES OF AMERICA,  
ACTING BY AND THROUGH  
THE ADMINISTRATOR OF GENERAL  
SERVICES**

By:



Andrew Heller  
Acting Commissioner  
Public Buildings Service  
General Services Administration  
1800 F Street, NW  
Washington, DC 20405-0002  
Phone: (202) 253-1597

## **SCHEDULE A**

### **AUTHORITY FOR THE TAKING**

The authority for the acquisition is 40 U.S.C. § 581(c)(1); 40 U.S.C. § 3304; and 40 U.S.C. §§ 3113-3114. Further authority and appropriations for the acquisition are contained in the Consolidated Appropriations Acts of 2021, Pub. L. No. 116-260, 134 Stat. 1410; Consolidated Appropriations Acts of 2022, Pub. L. No. 117-103, 136 Stat. 271; Consolidated Appropriations Acts of 2023 Pub. L. No. 117-328, 136 Stat. 4682; Further Consolidated Appropriations Act of 2024, Pub. L. No. 118-47, 138 Stat. 552; and Consolidated Appropriations Act of 2026, P.L. 119-75, Div. E, Title V, General Services Administration.

## **SCHEDULE B**

### **PUBLIC PURPOSE**

The public use for which the property is taken is for the construction of a United States Courthouse in Chattanooga, Tennessee, for use and occupancy by the United States District Court for the Eastern District of Tennessee and other federal agencies, and for such other uses as may be authorized by law, regulation, or Executive Order.

## **SCHEDULE C**

### **DESCRIPTION OF THE PROPERTY**

The property which is the subject matter of this proceeding consists of a parcel containing approximately 3.29-acres of land, more or less, improved with surface parking lots (as shown in "Schedule D") in the City of Chattanooga, County of Hamilton, Tennessee, more particularly described as follows:

Beginning at a magnetic nail set at the intersection of the north margin of Vine Street (60.0 feet right-of-way) and the east margin of Georgia Avenue (60.0 feet right-of-way), same being the southwest corner of the property herein described.

Thence, from the point of beginning and with the east margin of said Georgia Avenue, North 24°01'13" East, a distance of 177.99 feet to a 1\2 inch rebar found in the east margin of said avenue at the southwest corner of the JT Holdings property, ref. D.B. 13428, Pg. 916.

Thence, leaving the east margin of said avenue and with the south boundary of said JT Holdings property, South 65°32'59" East, a distance of 202.39 feet to a 1\2 inch rebar found at the southeast corner of said JT Holdings property.

Thence, with the east boundary of said JT Holdings property, North 24°14'45" East, a distance of 178.10 feet to a 5\8 inch rebar found, capped Hopkins Group, at the northeast corner of said JT Holdings property.

Thence, with the north boundary of said JT Holdings property, North 65°28'40" West, a distance of 21.67 feet to a 5\8 inch rebar found, capped Hopkins Group, and North 65°33'45" West, a distance of 181.48 feet to a P-K nail found on the east margin of the previously mentioned Georgia Avenue, same being the northwest corner of said JT Holdings property.

Thence, with the east margin of said avenue, North 24°04'12" East, a distance of 88.93 feet to a P-K nail found at the intersection of the east margin of said Georgia Avenue and the south margin of E. 5th Street (60.0 feet right-of-way), same being the northwest corner of the property herein described.

Thence, with the south margin of said street, South 65°44'39" East, a distance of 181.40 feet to a 5\8 inch rebar found, South 65°38'22" East, a distance of 40.05 feet to a 5\8 inch rebar found, capped Hopkins Group, South 65°48'48" East, a distance of 65.94 feet to a 5\8 inch rebar found, capped Hopkins Group, South 65°38'57" East, a distance of 52.03 feet to a 5\8 inch rebar found, capped Hopkins Group, and South 65°41'01" East, a distance of 64.04 feet to a 1\2 inch rebar found at the intersection of the south margin of said E. 5th Street and the west margin of Lindsay Street (56.0 feet right-of-way), same being the northeast corner of the property herein described.

Thence, with the west margin of said street, South 24°05'04" West, a distance of 280.42 feet to a 1\2 inch rebar found, South 24°08'16" West, a distance of 139.72 feet to a 5\8 inch rebar found, capped Betts Surveying, and South 24°01'29" West, a distance of 25.00 feet to a 1\2 inch rebar found at the intersection of the west margin of said Lindsay Street and the north margin of the previously mentioned Vine Street, same being the southeast corner of the property herein described.

Thence, with the north margin of said street, North 65°42'19" West, a distance of 402.89 feet to the point of beginning and containing 3.29 acres, more or less.

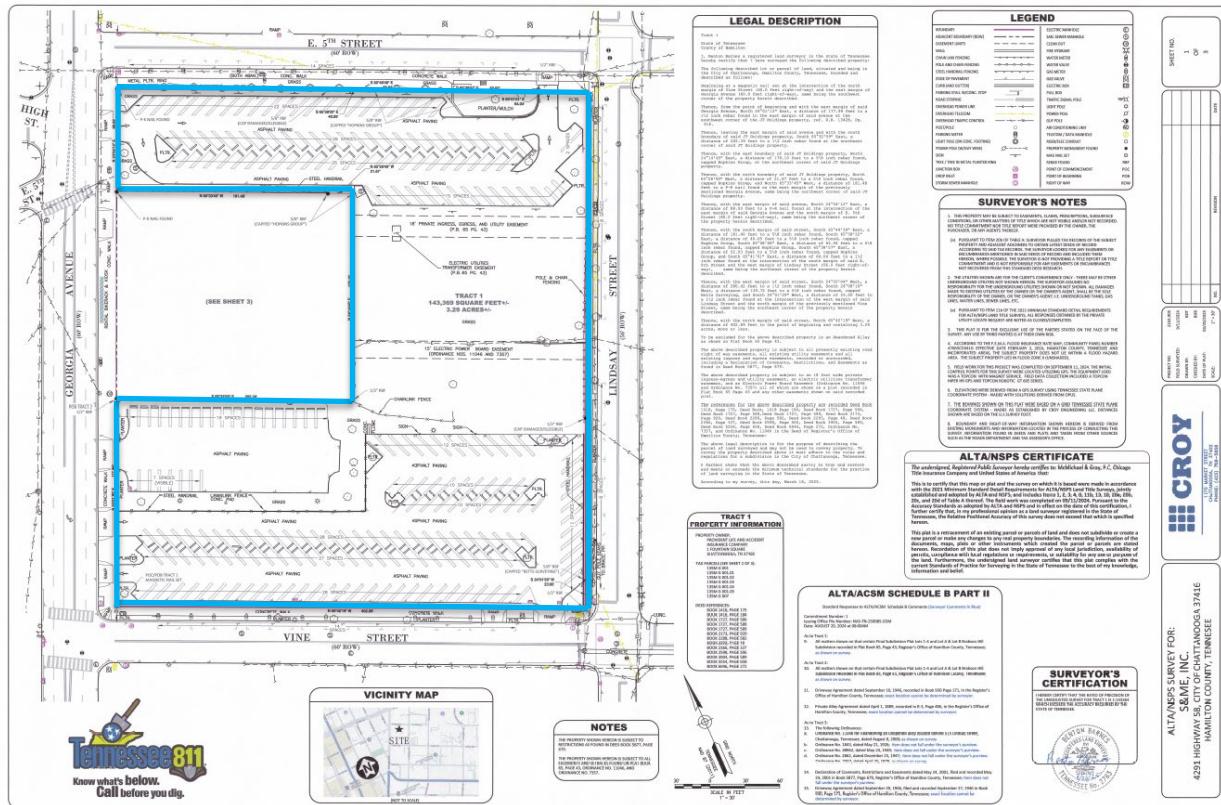
The references for the above described property are recorded Deed Book 1418, Page 175, Deed Book, 1418 Page 184, Deed Book 1727, Page 586, Deed Book 1727, Page 588, Deed Book 1727, Page 589, Deed Book 2173, Page 920, Deed Book 2288, Page 582, Deed Book 2293, Page 48, Deed Book 2366, Page 337, Deed Book 2598, Page 506, Deed Book 3904, Page 589, Deed Book 5554, Page 658, Deed Book 6046, Page 831, Ordinance No. 7357, and Ordinance No. 11046 in the Deed of Register's Office of Hamilton County, Tennessee.

According to the survey dated March 18, 2025 by Benton Barnes TN R.L.S. No. 2763.

**SCHEDULE D**

## SURVEY AND PHOTOGRAPH

The light blue lines in the survey and photograph below are intended to approximate the boundaries of the property described in Schedule C.





**SCHEDULE E**

**ESTATE TAKEN**

The estate taken is fee simple absolute, including all improvements thereon and appurtenances thereto, but excepting a 15-foot Electric Power Board Easement shown on a plat recorded in Plat Book 65 Page 43 (also referenced in Ordinance Nos. 11046 and 7357).

## **SCHEDULE F**

### **ESTIMATE OF JUST COMPENSATION**

The sum estimated as just compensation for the interests taken in the property at issue in this action is FOUR MILLION NINE-HUNDRED FIFTY THOUSAND AND 00/100 DOLLARS (\$4,950,000.00), to be deposited with the registry of said Court for the use and benefit of the persons entitled thereto.

## **SCHEDULE G**

### **INTERESTED PARTIES**

Names and addresses of the parties who have or may claim an interest in the property are:

<b>Interested Party</b>	<b>Reference(s)</b>
Provident Life & Accident Insurance Company, a subsidiary of Unum Group C/o Mr. Rick McKenney, CEO 1 Fountain Square Chattanooga, TN 37402	Deeds recorded at Book 2366, Page 337; Book 2293, Page 48; Book 2598, Page 506; Book 2173, Page 920; Book 1418, Page 184; Book 6046, Page 831; Book 1727, Page 589; Book 1727, Page 586; Book 1418, Page 175; Book 1727, Page 588; Book 228, Page 582; and Book 5554, Page 658.
Bright Base LLC c/o Britton Stansell, CEO 605 Chestnut St #300 Chattanooga, TN 37450	Existing parking lease on the property.
Office of the City Treasurer of Chattanooga Jamie Zurkiya, City Treasurer 101 E. 11 <sup>th</sup> Street Chattanooga, TN 37402	Any overdue taxes
Hamilton County Trustee Bill Hullander 625 Georgia Avenue, Rm 210 Chattanooga, TN 37402	Any overdue taxes