

Macon Circuit Court 904 Highway 52 East Lafayette, TN 37083 (615)666-2354	<div>STATE OF</div> <div>TENNESSEE</div> <div>Criminal</div> <div>CIVIL SUMMONS</div> <div>page 1 of 2</div>	Case Number 56CC1-2014-CV-70
STATE OF TENNESSEE (et. al) vs MARK GAMMONS SHERIFF OF MACON COUNTY (et. al)		
Served On:		
MARK GAMMONS SHERIFF OF MACON COUNTY	902 HWY 52 BYPASS EAST Lafayette, TN 37083	

You are hereby summoned to defend a civil action filed against you in Macon Circuit Court, Macon County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the required date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 9/9/2014

Begina Dies
Clerk / Deputy Clerk Macon Circuit Court

Attorney for Plaintiff: ROLAND F MUMFORD
242 WEST MAIN STREET, Hendersonville, TN 37075

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA §26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to execute it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to Rick Gann, Macon Circuit Court Clerk, Macon County
904 Highway 52 East
Lafayette, TN 37083

CERTIFICATION (IF APPLICABLE)

I, Rick Gann, Macon Circuit Court Clerk of Macon County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____
Clerk / Deputy Clerk – Macon Circuit Court

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows:

Date: _____ By: _____

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____
Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff _____ Plaintiff's Attorney (or Person Authorized to Serve Process)
(Attach return receipt on back)

**FILE COPY**

Macon Circuit Court
904 Highway 52 East
Lafayette, TN 37083
(615)666-2354

Criminal
**STATE OF
TENNESSEE
CIVIL SUMMONS**

Case Number
56CC1-2014-CV-70

page 1 of 1

STATE OF TENNESSEE (et. al) vs Mark J Gammons (et. al)

Served On:

Mark J Gammons
714 Old Hwy 52 W
Lafayette, TN 37083

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Issued: 9/9/2014

Begina L. Dues
Clerk / Deputy Clerk - Macon Circuit Court

Attorney for Plaintiff: ROLAND F MUMFORD
242 WEST MAIN STREET, Hendersonville, TN 37075

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Date: _____

Clerk / Deputy Clerk - Macon Circuit Court

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows:

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Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)
(Attach return receipt on back)

IN THE CRIMINAL COURT FOR MACON COUNTY, TENNESSEE
AT LAFAYETTE

FILED
MACON COUNTY

2014 SEP -9 PM 2:48

CIRCUIT COURT CLERK

STATE OF TENNESSEE,
UPON RELATION OF
EMILY SANTES AND ET AL.

PLAINTIFFS

vs.

Docket: 2014-CV-70

MARK GAMMONS in his individual
capacity and MARK GAMMONS
SHERIFF OF MACON COUNTY

DEFENDANT(S).

**COMPLAINT FOR ORDER OF SUSPENSION
FROM OFFICE AND FOR WRIT OF OUSTER**

Plaintiff the State of Tennessee, on relation of the following:

1. Emily Santes
2. Denise Davis
3. David Gunter
4. Tina Dyer
5. Shirley Jones
6. Judy Blankenship
7. Thomas Mowell
8. Michael Stewart
9. Joshua Smith
10. Richard Keller
11. Phillip Harper

12. Jimmy Hardin

13. Samantha Hardin

by and through counsel, Roland Mumford, pursuant to T.C.A. § 8-47-101, et seq., states as follows:

INTRODUCTION, PARTIES, AND JURISDICTION

1. This is an action to oust Defendant Mark Gammons (hereinafter referred to as Defendant Gammons), a sheriff elected in Macon County, Tennessee in 2006 and recently reelected to a third term.

2. Ouster is a statutory process for removing an elected public official “who shall knowingly or willfully commit misconduct in office, or who shall knowingly or willfully neglect to perform any duty enjoined upon such officer by any of the laws of the state, or who shall in any public place be in a state of intoxication produced by strong drink voluntarily taken, or who shall engage in any form of illegal gambling, or who shall commit any act constituting a violation of any penal statute involving moral turpitude.” T. C. A. § 8-47-101.

3. Article 7, Section 1 of the Tennessee Constitution provides that county officers shall be removed from office for malfeasance or neglect of duty. ““The terms ‘malfeasance’ and ‘neglect of duty’ are comprehensive terms and include any wrongful conduct that affects, interrupts, or interferes with the performance of official duty.” State ex rel. Complainant v. Ward, 43 S.W.2d 217, 219 (Tenn. 1931).

4. Tennessee Code Annotated 8-47-110 provides in pertinent part that ten citizen Plaintiffs and freeholders may bring this action to rectify wrongs committed by Defendant in joint concert with the district attorney and county law director who have been served a copy of this Complaint with demand they join in this action to protect the rights of the people of Macon

County. Therein, citizen Plaintiffs bring this action as ten (10) or more Macon County Tennessee citizens and freeholders with demand pursuant to T.C.A. § 8-47-111 that the attorney general and/or county law director join in this action “to aid and assist in the prosecution of such proceedings” as prescribed by statute when attorney general and/or county law director is put on notice of such demand. Furthermore, pursuant to T.C.A. § 8-47-112, Plaintiffs demand that the Governor of the state of Tennessee “employ on behalf of the state additional counsel to aid in the prosecution of such proceedings whenever the default charged involves the failure or neglect of the accused to perform the accused's duty under any law or laws of the state” as alleged herein.

5. Defendant Gammons is an elected Sheriff of Macon County and is sued in his individual and personal capacity for such acts, omissions, and/or offenses that are more specifically set out by individual count herein that constitute crimes of moral turpitude. Furthermore, Defendant Gammons is sued in his official capacity as Sheriff of Macon County.

6. T.C.A. 8-47-103 provides that if the investigation establishes reasonable cause that Defendant Gammons committed such acts, omissions, and/or offenses set out in the statute, an ouster action must be commenced. Plaintiffs will show that Defendant Gammons has “knowingly” and “willfully” committed the same beyond mere “simple negligence” and should be ousted from office. Tennessee ex rel. Leech v. Wright, 622 S.W.2d 807, 817 (Tenn.1981) (citing Jordan v. State, 217 Tenn. 307, 397 S.W.2d 383, 398 (1965)).

7. The investigation has established that “reasonable cause” exists to believe that Defendant Gammons has committed acts, omissions, and/or offenses set out in T.C.A. 8-47-103. Counsel for Plaintiffs has investigated facts provided by competent citizens prepared to swear to the same under oath and penalty of perjury.

8. Plaintiffs are citizens of Macon County as defined in T.C.A. 8-47-110.

9. Roland Mumford is lead counsel for Plaintiffs and authorized to bring this action pursuant to T.C.A. 8-47-101. The district attorney and/or county law director for Macon County is authorized and required to join in this cause of action upon demand by Plaintiffs pursuant to T.C.A. 8-47-111 et seq.

10. Pursuant to T.C.A. 8-47-103, this Court has jurisdiction to hear this cause of action and venue is proper in this county.

11. Defendant Gammons took an oath of office to support, obey, enforce, and defend the laws of Macon County and the State of Tennessee

FACTUAL ALLEGATIONS

12. During the first term for which Defendant Gammons was elected in 2006, a Macon County Sheriff's Department detective transported Defendant Gammons in a county vehicle to several residences and dwellings to have intimate relationships with females. The detective was on shift being compensated by Macon County during transport. The detective transported Defendant Gammons on several occasions out of state in a county vehicle to Akersville, Kentucky where a female resided. Akersville, Kentucky is directly north of Macon County, Tennessee. The detective who is no longer employed at the Macon County Sheriff's department has provided a statement to counsel for Plaintiffs and shall testify upon oath to several additional accounts of such moral turpitude.

13. In March 2014, Defendant Gammons in a staff meeting explicitly and/or implicitly threatened and intimidated employees who may be supporting his opponent and that there may be retaliation for the same. This meeting was recorded and shall be produced as an exhibit before this Court.

14. In July 2014, Defendant Gammons explicitly threatened and intimidated Plaintiff Joshua Smith who was an employee at the Macon County Sheriff's Department for the support of his opponent by Mr. Smith's father. This conversation was recorded and shall be produced as an exhibit before this Court. A transcription of this audio recording will be filed as an exhibit with this complaint which shall be referenced and incorporated herein as if specifically set out. Plaintiff Joshua Smith's employment was terminated by Defendant Gammons.

15. On August 8, 2014, Defendant Gammons terminated the employment of Plaintiffs Joshua Smith, Richard Keller, Phillip Harper, and Jimmy Hardin. Defendant had actual knowledge of their families' support for his opponent.

16. During the summer of 2014, Karla Swindle who is the mother of Plaintiff Phillip Harper, was approached by Macon County Sheriff's Department Chief Deputy Brian Satterfield. Mr. Satterfield asked her to vote for Defendant Gammons to which Mrs. Swindle replied "I wouldn't vote for that sorry son of a bitch if I had to." She further stated she had voted for Defendant Gammon's opponent. Upon information and belief, Mr. Satterfield communicated this statement to Defendant Gammons.

17. On or about August 2, 2014, Plaintiff Phillip Harper had a conversation with Butch Avera who was Defendant Gammons opponent in front of the City Hall in Lafayette, Tennessee. Macon County Sheriff's Department Deputy Anthony Warner drove by and witnessed the conversation. Upon information and belief, Mr. Warner communicated this to Defendant Gammons. Plaintiff Phillip Harper's employment was terminated by Defendant Gammons.

18. During the election cycle of 2014, Johnny Shockley, who is Plaintiff Richard Keller's nephew, was a visible and outspoken supporter of Defendant Gammon's opponent.

Defendant Gammons had actual and/or constructive knowledge of this expression of support of his opponent. Plaintiff Richard Keller attempted to communicate to Defendant Gammons that he was not the anonymous source of the March 2014 staff meeting recording referenced herein. Subsequent to Defendant Gammons scolding an inmate in an erratic and hostile tone, he proceeded to approach Plaintiff Richard Keller behind his chair and state "I want some God damn body else to call channel four." Plaintiff Richard Keller attempted to reiterate that he was not source of the recording before Defendant Gammons responded "that God damn nephew of yours." Plaintiff Richard Keller's employment was terminated by Defendant Gammons.

19. During the spring of 2014, Macon County Sheriff's Department Chief Deputy Brian Satterfield advised Plaintiff Jimmy Hardin that everybody in the department needed to support Defendant Gammons. Plaintiff Jimmy Hardin responded that he had known Butch Avera for over twenty years. Upon information and belief, Mr. Satterfield communicated this statement to Defendant Gammons.

20. Defendant Gammons expressed an overt statement to Plaintiff Michael Stewart and another witness that he would terminate the employment of any individual that supported his opponent or did not support him.

21. Defendant Gammons instructed Plaintiff Phillip Harper as an employee at the Macon County Sheriff's Department to use a county vehicle on his shift and drive to Smith County to pick up a check issued to Defendant Gammons for the sale of cattle. Upon information and belief, another employee would go to cattle sales with Defendant Gammons while on his shift receiving wages from Macon County.

22. Upon information and belief, Defendant Gammons has requested employees to perform tasks constituting personal errands while employees were on shift receiving pay from the county and utilizing county vehicles.

23. Upon information and belief, Defendant Gammons has employed two female employees at separate times to be employed in the booking department or front office whom he had romantic and/or intimate relationships with. One or more of these female employees were employed at a separate entity performing duties while continuing to receive wages from Macon County. The business where the female employee performed her duties is believed to be a child care center.

24. Defendant Gammons instructed deputies and detectives as employees at the Macon County Sheriff's Department to use county vehicles on their shift to participate in campaign activity such as placing and/or removal of signs and appear at campaign events.

25. Defendant Gammons has routinely permitted individuals arrested by his department or other law enforcement to be released prior to booking and/or incarceration without proper prosecution while other individuals not having such friendship were incarcerated and prosecuted.

26. One week prior to the election, a resident on Dodson Road received a yellow card inside her mailbox placed by a Macon County Sheriff's Department employee. The card was marked to convey he was on patrol and checking in. The card is believed to have been placed around 1:00 a.m. The resident did not place a call to the Macon County Sheriff's Department alerting of suspicious activity or a crime being committed. The resident had a Butch Avera for Sheriff campaign sign in her yard. Upon information and belief, the deputy was performing campaign activities for Defendant Gammons while on shift and receiving wages from Macon

County. Defendant Gammons has actual and/or constructive knowledge of these acts and it is reasonably averred by Plaintiffs he instructed employees to perform these tasks. Two additional Macon County citizens residing on Kyson Circle who had signs for Butch Avera received the same cards placed on their doors prior to the election. These cards were placed by Kimball Hall who is an employee of the Macon County Sheriff's Department.

27. On August 7, 2014, Plaintiff Gunter was at the polling place on Galen Rd. at approximately 12:45 pm when Defendant Gammons arrived to bring his poll workers refreshments. A short time later, he was in a black sports utility vehicle owned by the county with Macon County Sheriff's Department Chief Deputy Brian Satterfield. Defendant Gammons arrived once again approximately forty five minutes later. Plaintiff Gunter confronted Defendant Gammons and inquired as to why he was procuring a county patrol vehicle to visit the polling places. Defendant Gammons responded that he was the Sheriff and he could patrol if he wanted to. Plaintiff Gunter expressed to him that he thought he was campaigning. Defendant Gammons reiterated boastfully that he was the Sheriff. While Defendant Gammons was there on "patrol," he was expressing his appreciation to voters for supporting him as they were entering and departing the polling location. Bennie Hudgens who is a former employee of the Macon County Sheriff's Department witnessed the aforementioned facts occurring at a polling center located at the Crossroads Community center in the Rocky Mound Community of Macon County.

28. Upon information and belief, there were numerous Macon County Sheriff Department employees wearing campaign shirts and hats for Defendant Gammons inside the Macon County Justice Center while on shift and receiving wages from Macon County. There was a large gathering of employees in the rear of the Macon County Justice Center appearing for a photograph that was in a campaign advertisement published in a local newspaper. Upon

information and belief, Defendant Gammons used an inmate who was under the Sheriff's care and custody to place boxes presumed to contain campaign materials in the rear of a county vehicle parked at the Macon County Justice Center.

29. During 2012, Tommy Daugherty who resides in Macon County, traded a truck for a Snapper 60 inch zero turn mower. The Macon County Sheriff's Department informed Mr. Daugherty that the mower was stolen and that he was to return it to their custody and control. Mr. Daugherty complied with the request. Subsequently, Mr. Daugherty inquired of the department about his truck being returned and about observing Defendant Gammons utilizing the mower at his personal residence. Mr. Daugherty was informed that the insurance company forfeited the mower to their department and it is presumed to be the property of Macon County. Mr. Daugherty further in 2013 has communicated on four or more occasions to the Macon County Sheriff's Department about trespassers on his property possibly committing theft. Defendant Gammons "knowingly or willfully neglected to perform any duty enjoined upon such officer by any of the laws of the state" by omitting to investigate these calls.

30. Mark Barber is a resident of Macon County, Tennessee. Mr. Barber loaned a tractor to a younger citizen of Macon County. The young male R.D. sold the tractor without consent of Mr. Barber. Mr. Barber attempted to swear out a warrant for his arrest and prosecution. Defendant Gammons communicated to Chief Deputy Brian Satterfield and another detective that "it looks like we got him this time." Mr. Barber attempted to follow up on the warrant after it was evident that R.D. was not arrested as all arrests are published in the local paper. Defendant Gammons retaliated against Mr. Barber by having deputies pull Mr. Barber's wife over for a stop alleging she ran a stop sign. Mr. Barber's wife who is from a foreign country did not have a driver's license. Mr. Barber observed a Macon County Sheriff's

Department deputy parked a mile or so from his house along a roadway for several days. Mr. Barber proclaims this is not a customary practice of patrol by the Sheriff's department. Defendant Gammons did not arrest R.D. for prosecution and there is a question as to the location, disposition, and/or adjudication of the warrant.

31. Upon information and belief, Defendant Gammons has permitted a nurse to deviate from the local standard of care in failing to render proper medical care and disbursing prescription medication. In addition to or in the alternative, inmates received prescription medications at inappropriate times and/or not as properly prescribed. Plaintiffs aver there are documents within the custody and/or control of Defendant Gammons and/or at the Macon County Justice Center sustaining these allegations and contemporaneously noted.

COUNT ONE INTIMIDATION AND COERCION

32. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs one through thirty two herein as if set out specifically verbatim.

33. Defendant Gammons engaged in a willful course of conduct involving the repeated and continuing use of his official position or "authority or influence to interfere with an election or nomination for office or directly or indirectly attempt to intimidate, coerce or command any other officer or employee to vote for or against any measure, party or person...." Such acts are a violation of T. C. A. § 2-19-202.

34. Defendant Gammons engaged in a willful course of conduct "directly or indirectly, to deprive, attempt to deprive, or threaten to deprive any person of employment, position, work, compensation, contracts, loans, grants, appropriations or benefits provided principally from public funds for any political activity, support or opposition to any candidate, party or measure in any election" in violation of T. C. A. § 2-19-205.

35. Defendant Gammons engaged in a willful course of conduct by displaying campaign literature, signs, and such other advertisements on government property in violation of T. C. A. § 2-19-206(a). Defendant Gammons utilized county owned vehicles and instructed other Macon County Sheriff's Department detectives and/or employees to drive county owned vehicles and collect campaign signs. Defendant Gammons in his official capacity receives funds from the State of Tennessee for a variety of purposes invoking application and scope of such statute.

COUNT TWO MISUSE OF COUNTY TIME AND PROPERTY

36. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs one through thirty six herein as if set out specifically verbatim.

37. Defendant Gammons engaged in a willful course of conduct with an "intent to obtain a benefit"..... "Intentionally" and/or "knowingly"... "not authorized by law" in violation of T. C. A. § 39-16-402. Procurement by Defendant Gammons as a "public servant" of his employees while on their shift earning wages and county property for his personal benefit as referenced above constitute a violation of T. C. A. § 39-16-402. "Public funds provided by taxation may only be used for public purposes and that public equipment and other property paid for, and public officers and employees compensated by, public funds cannot properly be donated or applied to a private use. Tenn. Op. Atty. Gen. No. 84-166 (May 17, 1984)." Defendant Gammons is a public servant as defined by T. C. A. § 39-16-401. Plaintiffs aver that procurement of county employees and resources for campaign purposes constitute official misconduct and within the scope of T. C. A. § 39-16-402.

COUNT THREE THEFT OF SERVICES

38. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs one through thirty eight herein as if set out specifically verbatim.

39. Defendant Gammons engaged in a willful course of conduct by “having control over the disposition of services to others, knowingly divert[ing] those services to [his] own benefit....” in violation of T. C. A. § 39-14-104. Defendant Gammons is a “person” as defined by T. C. A. § 39-11-106 subject to T. C. A. § 39-14-104(a). Sheriffs elected in the state of Tennessee are subject to said statute and to be held accountable as similar acts applied in State v. Gardner, 1990 WL 169233 (Tenn.Crim.App. 1990) (county sheriff who used deputy sheriffs to build his personal residence was convicted of misuse of public funds in violation of T.C.A. § 39-5-408, the statute replaced by T.C.A. § 39-14-104(2)).

40. Defendant Gammons engaged in a willful course of conduct by permitting an inmate under his “care and custody”...[to]... “perform labor”...that “resulted directly or indirectly in the sheriff’s....personal gain” in violation of T. C. A. § 41-2-148. Defendant Gammons, upon information and belief, instructed an inmate to be released and for him to surreptitiously attend an event held by his opponent.

41. Defendant Gammons procuring a county owned mower is a violation of T. C. A. § 39-14-104.

42. Defendant Gammons engaged in a willful course of conduct by procuring county vehicles and county employees in county vehicles for “private use” in violation of T. C. A. § 54-7-202.

43. Defendant Gammons permitting paramours to be employed by his department and receiving wages while performing duties and receiving wages elsewhere during the same shift constitutes official misconduct and theft of services in violation of T. C. A. § 39-14-104(a).

COUNT FOUR NEGLIGENCE OF DUTIES REQUIRED BY LAW

44. Plaintiffs incorporate by reference all of the allegations set forth in paragraphs one through forty four herein as if set out specifically verbatim.

45. Article 7, Section 1 of the TENNESSEE CONSTITUTION provides that county officers shall be removed from office for malfeasance or neglect of duty. "The terms malfeasance' and 'neglect of duty' are comprehensive terms and include any wrongful conduct that affects, interrupts, or interferes with the performance of official duty." State ex rel. Complainant v. Ward, 43 S.W.2d 217, 219 (Tenn. 1931).

46. Defendant Gammons has engaged in a willful course of conduct "by refrain[ing] from performing a duty that is imposed by law or that is clearly inherent in the nature of the public servant's office or employment" in violation of T. C. A. § 39-16-402(a)(3). Defendant Gammons has willfully permitted individuals arrested with probable cause to avoid booking, arrest, incarceration, and/or prosecution. Defendant Gammons has routinely failed to execute warrants lawfully obtained by varying law enforcement agencies in Macon County for select individuals.

47. T. C. A. § 38-3-107 sets out the following: "Any magistrate or officer, having notice of any unlawful act provided against in this chapter, who neglects or refuses to do the magistrate's or officer's duty in the prevention of the public offense commits a Class C misdemeanor." The aforementioned facts averred herein clearly and convincingly demonstrates a violation of this statute by Defendant Gammons.

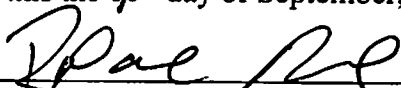
PRAYER FOR RELIEF

WHEREFORE PREMISES CONSIDERED, having fully stated its claims, Plaintiffs seek the following relief:

1. That process issue and that Defendant Gammons be required to answer this Complaint within the time prescribed by law;
2. That the Court find that each of Defendant Gammons' actions alleged above constitute a violation of a penal statute involving moral turpitude;
3. That the Court find that Defendant Gammons' actions alleged above constitute willful misconduct in office;
4. That the Court find that Defendant Gammons' actions alleged above constitute willful neglect of duties required by law;
5. That Defendant Gammons be notified that a hearing will be conducted pursuant to T.C.A. § 8-47-116, at which time the Court will consider his suspension from office, pending resolution of these proceedings;
6. That the Honorable Judge of this Court try this case;
7. That after a final hearing on the claims asserted herein, the Court enter an Order ousting Defendant Gammons from office;
8. That the costs of this matter and attorney fees be taxed and/or awarded to Plaintiffs.
9. For such other relief and further relief to which it may be entitled.

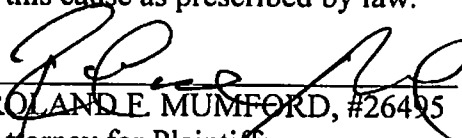
Respectfully submitted this the 9th day of September, 2014.

BY:


ROLAND F. MUMFORD, #26495
Attorney for Plaintiffs
242 West Main Street, No. 223
Hendersonville, TN 37075
Telephone: 615.348.0070
Facsimile: 615.246.4110

Cost Bond

I hereby acknowledge myself as surety for the cost of this cause as prescribed by law.


ROLAND F. MUMFORD, #26495
Attorney for Plaintiffs

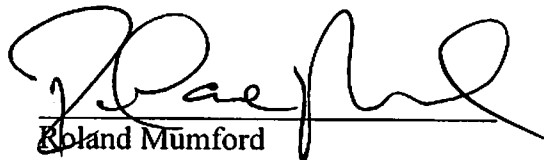
CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been sent via United States mail, postage prepaid, and properly addressed to:

E. Guy Holliman
102 Scottsville Hwy.
P.O. Box 280
Lafayette, TN 37083

Hon. Tommy Thompson
District Attorney
P.O. Box 178
203 Greentop Street
Hartsville, TN 37074

this 9th day of September, 2014.

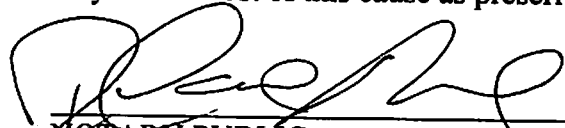

Roland Mumford

Acknowledgment





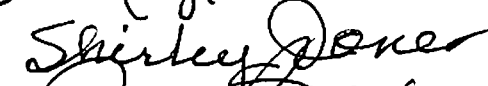




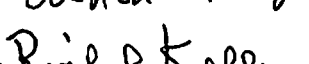
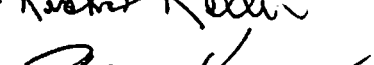

Plaintiffs herein after being first sworn makes oath that the allegations of the foregoing complaint are true to the best of their information, knowledge, and belief.

Cost bond

Plaintiffs hereby acknowledge themselves each as surety for the cost of this cause as prescribed by law


NOTARY PUBLIC

My commission expires: 1-26-16

1. Emily Santes 
2. Denise Davis 
3. David Gunter 
4. Tina Dyer 
5. Shirley Jones 
6. Judy Blankenship 
7. Thomas Mowell 
8. Michael Stewart 
9. Joshua Smith 
10. Richard Keller 
11. Phillip Harper 
12. Jimmy Hardin 
13. Samantha Hardin 