

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
LITTLE ROCK DIVISION**

PATTY HECTOR

PLAINTIFF

v.

CASE NO. 4:25-cv-91-JM

**MATTHEW BRUMLEY, SALINE COUNTY JUDGE,
IN HIS OFFICIAL CAPACITY, AND SALINE COUNTY,
ARKANSAS**

DEFENDANTS

28 U.S.C.A. § 1746 AFFIDAVIT

STATE OF ARKANSAS)
) ss:
COUNTY OF SALINE)

Comes now Saline County Judge Matt Brumley, and states, upon oath and on personal knowledge (except where indicated), the following:

1. I am the Saline County Judge. I have held the same position since January 1, 2023.
2. After I won the election and took office, I learned from some community members that there were concerns regarding the Saline County Library. In February 2023, these concerns were shared by members of the community, at Quorum Court Committee meetings and around town. Although I think some citizens were genuinely concerned regarding the issues being raised, the concerns were not always conveyed in a constructive manner, especially when they were conveyed in the form of personal attacks on library staff.
3. Once I became aware of the issues between citizens of the community and the Saline County Library, specifically the Director, I tried to ease tensions on what were clearly emotional issues for the concerned county residents and the Saline County Library employees. I did this by

Exhibit 1

regularly insisting on civil discourse - discouraging name calling and the like - and trying to model such civil communication when I spoke about the issues.

4. Despite my attempts to bring down the temperature on the discussion, the director of the county library, Ms. Patty Hector, consistently and repeatedly took the opposite approach, labeling the tax-paying county residents who raised concerns as racists, homophobes, and other terrible names, all while impugning their motives as evil.

5. Unfortunately, and despite my conversations with her, Ms. Hector continued to escalate the situation in the community with respect to the debate about children's access to explicit materials.

6. Ms. Hector was interviewed for the local news in her office at the library, with her Saline County Library Director name tag, without consulting me or the communications director, where she repeated her name-calling of the citizens and her accusations of deceit on the part of the concerned residents.

7. Ms. Hector's statement were made entirely in her role as County Library Director; to my knowledge, she did not consult with anyone before making any of her remarks to the news agency. Additionally, she introduced herself as the Library Director, conducted interviews at the Library, and was essentially the only Library employee to make any public comments in their official capacity, again, to my knowledge.

8. Another thing that deeply concerned me about Ms. Hector's leadership at the County Library was her apparent refusal to take on the actual work of the Library. In our multiple conversations in 2023, Ms. Hector told me that nearly every aspect of the Library's operation - from purchasing to community programming to book placement/content evaluation - was "not her job".

As an elected leader, I firmly believe that every job of an organization is the leader's job. While delegation - especially of day-to-day tasks - is obviously required in larger organizations, I can't imagine saying that a categorical function of an organization I lead is "not my job."

9. Ms. Hector's "not my job" stance took an extremely strange turn in the context of the content evaluation/child accessibility discussion that was taking place in the community. In my attempt to better understand the debate, I asked several of the concerned residents what book was most concerning and several of them mentioned the same book, *All Boys Aren't Blue*. As a result, I brought the book up in my next conversation with Ms. Hector and asked her to evaluate it.

10. I understand that it is important for a library to have an objective process to review material and I support the Saline County Library's reconsideration committee policy. I also understand that it is impossible for one library employee to read every book in the library, but I think it is critical for a Library Director to listen to citizens' concerns and to become familiar enough with the material to determine whether or not the concern is valid.

11. I specifically asked the Plaintiff to look into the book *All Boys Aren't Blue* to determine if the citizens' concerns were valid. She confirmed that she had not read the book and blatantly refused to do so. That made clear to me that she was not listening, or not taking seriously, the concerns of the patrons. I agreed and proceeded to do so, but it was clear from that moment on that she had no interest in listening to the concerns of citizens and patrons in the community.

12. Despite Hector's refusal to get involved, I read *All Boys Aren't Blue* shortly after our conversation. The book contained a number of explicit sections, with the worst probably being its graphic account of the anal rape of a minor by an adult. When I came back, I asked the reconsideration committee, in writing (per the policy), to move the book out of the juvenile section

in light of its graphically explicit and sexual content. As I understand it, the committee read the book and determined that it should be moved to a new adult section that was being created. Before the committee's conclusions were issued, however, my understanding is that Ms. Hector got involved and revised the committee letter, both to emphasize that the book would remain in the same section (where it was accessible to children) and to emphasize that any remediation, by the creation of a new adult section, would take some time. This latter point was another observation I had about Ms. Hector, namely, that she appeared to be slow-playing any remedial or conciliatory steps to address community concerns, apparently hoping it would all blow over and that she would never have to take any action at all.

13. The cumulative effect of Ms. Hector's actions was, predictably, a heightening of the conflict. The Quorum Court voiced concern that the conflict might never end, as Ms. Hector was not subject to any oversight by any elected official, despite being the director of an institution receiving \$ 4 million in annual tax proceeds.

14. Unlike every other County Department, the oversight over the Saline County Library was solely the Library Board and its appointed members, not the County Judge or some other elected official. This resulted in differences such as cost of living adjustments being different for the library than any other department and the library not following all Saline County policies that are standard policies for all County Departments. Such differences can, of course, create significant internal strife.

15. As a result, and after consultation with legal counsel, the Quorum Court passed an ordinance transferring oversight of the County Library to the County Judge rather than the Library. As County Judge, I did not vote on this ordinance.

16. After the ordinance passed, transferring oversight of the County Library to me, my concern about the lack of leadership at the Saline County Library continued. Thus, after consultation with legal counsel, I made the decision to terminate Ms. Hector's employment.

17. I did not decide to terminate Ms. Hector's employment until after the Quorum Court passed the ordinance transferring oversight from the Library Board to the County Judge. As such, I certainly did not tell anyone on the Quorum Court that I planned to fire Ms. Hector if they passed the ordinance (because that wasn't true). Likewise, no one on the Quorum Court indicated to me, in any way, that they were voting on or passing the ordinance so that I could take any particular action(s), including but not limited to termination of Ms. Hector's employment.

18. Ms. Hector demonstrated other concerning behaviors after I took office in January 2023 that I took issue with. These behaviors included, but were not limited to, stating on the Saline County Library podcast that I, as well as the Quorum Court, approved a merger with the Garland County Library, despite the fact that she had not discussed the issue with me. She also sent emails to the Saline County Library Listserv impliedly asking library patrons to contact Quorum Court members to not vote for ordinance 2023-17. There were also issues brought to light during a Legislative Audit regarding commingling of funds to the "Friends of the Saline County Library" 501(c)(3) with the actual Saline County Library funds.

19. To be clear, I did not terminate Ms. Hector's employment based on the substance of any of her remarks. To the contrary, and in broad strokes, I terminated Ms. Hector (1) because she refused to foster constructive conversations regarding the issues surrounding the Saline County Library in 2023, (2) because she refused to engage in any tangible efforts to remediate, conciliate, or even hear out citizens' concerns (instead calling them names and accusing them of deceit and ill

motives), (3) because she repeatedly said - and acted as though - none of the major functions of the Library (except for making unilateral public statements for the Library) were “her job,” and (4) based on other behaviors (described above) where I thought she had misused her position, provided incorrect and misleading information to patrons on official library media to sway the Quorum Courts’ vote on ordinance 2023-17, and her lack of professionalism, failure to listen to patrons and responding with name calling and insults, all of which stirred the controversy in the community.

28 U.S.C.A. § 1746 Affidavit Oath

I declare under penalty of perjury, upon oath and on personal knowledge (except where indicated), under the laws of the United States of America, that the foregoing is true and correct.



Saline County Judge Matt Brumley

07-09-2026
Date