



April 28, 2026

**Via Email: rchess@cityoffortpierce.com
Via Certified Mail**

City of Fort Pierce
Attn: Richard Chess, City Manager
100 N US Highway 1
Fort Pierce, FL 34950

Re: Johnna Morris

Dear City Manager Chess:

This firm represents Ms. Johnna S. Morris, the City of Fort Pierce's Finance Director and Chief Financial Officer, in connection with unlawful conduct by City Attorney Sara Hedges following receipt of a wage garnishment in April 2026. After 18 years of distinguished service to the City, Ms. Morris was placed on administrative leave without any written notice, stated basis, or due process, her private financial information was deliberately disclosed to City Commissioners, by the City Attorney who had previously accused Ms. Morris of fraud and perjury. These actions have caused significant reputational harm to Ms. Morris through public Commission meetings and news coverage.

The City's actions have violated Ms. Morris's constitutional rights under 42 U.S.C. § 1983, Florida's constitutional right to privacy, and state law protections against defamation and invasion of privacy. This letter serves as formal notice of Ms. Morris' claims and a demand for immediate resolution before litigation becomes necessary.

Given City Attorney Hedges's direct involvement in this matter and her inherent conflict of interest, we respectfully request that she not participate in any aspect of the City's response, and that the City retain outside counsel to handle this matter.

FACTUAL BACKGROUND

Ms. Morris is a long-tenured, dedicated public servant who has served the City of Fort Pierce with distinction for approximately 18 years. She was hired on March 28, 2008, and serves as the City's Finance Director and Chief Financial Officer, reporting directly to City Manager Richard Chess. In this high-level position with an approximate annual salary of \$180,000, Ms. Morris has significant responsibilities managing the City's finances and operations. Throughout her tenure, Ms. Morris has maintained an exemplary record with no prior disciplinary history.



The City has maintained a longstanding practice to ensure that employees' private financial matters remained private, as garnishments are handled discreetly through payroll without intentional public disclosure. On approximately April 8, 2026, while Ms. Morris was away at a work conference, the City received a continuing writ of garnishment related to a personal debt owed by Ms. Morris. Rather than following the aforementioned confidential practice, City Attorney Hedges took the extraordinary step of intercepting Ms. Morris' garnishment and launching an invasive and unprecedented response. City Attorney Hedges did not stop at the garnishment itself. She went to the public court docket and researched additional prior judgments against Ms. Morris, judgments that were entirely unrelated to the current garnishment and had already been paid off. Armed with this information, Hedges then individually called each City Commissioner one by one to disclose Ms. Morris' personal financial information. During these calls, Hedges recommended Ms. Morris' immediate termination, and recommended that the City conduct a forensic audit of Ms. Morris. This conduct went far beyond any legitimate official duty and represented a deliberate weaponization of private information against a long-serving employee.

On April 13, 2026, City Manager Chess and HR Manager Jared Sorensen summoned Ms. Morris to an 8:30 a.m. meeting. At this meeting, they placed her on paid administrative leave "pending investigation." Ms. Morris received no written notice. She was given no stated reason or basis for the investigation. She was afforded no opportunity to respond to any allegations. She received no explanation of her rights or the process that would follow. Despite her 18 years of loyal service to the City, Ms. Morris was escorted to her office to collect her belongings and was walked out of the building in a humiliating manner, as if she committed an egregious act.

The complete absence of any procedural protections is striking. Ms. Morris, a senior Finance Director with nearly two decades of service, was suspended without the most basic due process, no written notice, no explanation, no hearing, nothing.

On April 15, 2026, HR Manager Sorensen called Ms. Morris and instructed her to return to work on April 16. When she returned to work the following day, Ms. Morris received no written notice explaining her required leave. She received no findings from any investigation. She received no explanation of what allegations, if any, had been investigated. She received no documentation of the outcome. The City's actions were entirely arbitrary, leaving Ms. Morris without any understanding of what had occurred or why.

The situation became public at the April 20, 2026 City Commission meeting, where the City Attorney's handling of the matter was openly discussed. Commissioner Chris Dzadovsky presented a formal 12-question written inquiry challenging Hedges'



authority and questioning whether she was aware that federal law prohibits employers from terminating employees based on a single wage garnishment. The details of Ms. Morris' garnishment and personal financial information became part of the public record through this meeting, which was livestreamed and recorded. The public nature of the discussion triggered immediate media attention.

On April 22, 2026, the Sunland News published an article describing the entire situation, identifying the wage garnishment dispute and raising questions about potential violations of federal law. A social media flyer was circulated showing photographs of Ms. Morris alongside the Mayor, Commissioners, City Manager, and City Attorney Hedges. Ms. Morris has received phone calls from media outlets and members of the public. She has suffered severe humiliation, emotional distress, and reputational harm as a direct result of having a private financial matter deliberately made public by City Attorney Hedges through conduct that far exceeded any arguable official duty.

LEGAL VIOLATIONS

Violation of Procedural Due Process Rights

The City's actions violate Ms. Morris' constitutional rights under 42 U.S.C. § 1983 and the Fourteenth Amendment. Ms. Morris, an 18-year Finance Director with a protected property interest in continued employment, was placed on administrative leave without any written notice, stated basis for suspension, opportunity to be heard, or explanation of investigation findings. The complete absence of pre-deprivation or post-deprivation process violates clearly established constitutional protections for public employees.

Deprivation of Liberty Interest Through Stigmatizing Statements

City Attorney Hedges's call for Ms. Morris' termination in connection with a tangible adverse employment action constitute a violation of Ms. Morris's liberty interest under 42 U.S.C. § 1983. Ms. Morris was denied any name-clearing hearing.

Invasion of Constitutional Privacy Rights

The City violated Ms. Morris' rights under Article I, Section 23 of the Florida Constitution. City Attorney Hedges deliberately went beyond the garnishment itself to research and disclose additional unrelated financial records, then individually called each Commissioner to disseminate this private information. This targeted government intrusion exceeded any legitimate official duty and violated Ms. Morris' state constitutional right to privacy.

Public Disclosure of Private Facts

The City's deliberate disclosure of Ms. Morris's private financial information violated Florida common law privacy protections. The City's longstanding practice treated garnishments as confidential matters handled through payroll. City Attorney Hedges



weaponized this information against Ms. Morris specifically, breaching the established privacy practice.

Violation of Federal Garnishment Protections

The City's suspension and threatened termination of Ms. Morris based solely on a single wage garnishment violates 15 U.S.C. § 1674, which prohibits adverse employment actions by reason of garnishment for a single indebtedness. Commissioner Dzadovsky's written inquiry acknowledged the City's potential violation of this federal law.

DEMAND FOR SETTLEMENT

The City's unlawful conduct has caused Ms. Morris severe and ongoing harm to her reputation, mental health, and standing in the community after 18 years of distinguished service. Ms. Morris is entitled to full and fair compensation for these violations of her constitutional rights and dignity. Ms. Morris demands the following relief to resolve all claims arising from the City's unlawful conduct:

- Compensatory damages in the amount of \$200,000 for emotional distress, humiliation, reputational harm, and mental anguish;
- Reimbursement of all reasonable attorney's fees and costs as provided under 42 U.S.C. § 1988;
- A public written apology from the City to be read at a Commission meeting and published in the Sunland News, acknowledging the improper conduct and clearing Ms. Morris' name;
- Appropriate disciplinary action against City Attorney Sara Hedges, up to and including termination, to ensure accountability;
- Immediate recusal of City Attorney Hedges from any role in this matter and retention of independent outside employment counsel to negotiate resolution;
- Removal of all records related to the April 13-16, 2026 leave from Ms. Morris's personnel file;
- A written non-retaliation and non-disparagement agreement protecting Ms. Morris from future adverse actions; and
- Restoration of the City's prior practice of routing garnishments to payroll for confidential processing.



Please respond to this demand by **May 4, 2026**. If the City does not respond or provide a reasonable settlement offer by this deadline, Ms. Morris will have no choice but to pursue all available legal remedies to seek compensatory damages, punitive damages, injunctive relief, and attorney's fees. This letter is made without waiver of any rights or remedies, all of which are expressly reserved.

PRESERVATION NOTICE

You are hereby directed to preserve and retain all documents, electronically stored information as defined by Federal Rule of Civil Procedure 34, and other tangible evidence relevant to this matter. The duty to preserve arises immediately upon receipt of this letter and continues until the matter is fully and finally resolved. Among other information, the following categories of documents and information must be preserved:

- All communications between City Attorney Hedges and any City Commissioner regarding Ms. Morris, the garnishment, or related financial records from March 2024 to present, including emails, text messages, voicemails, and recorded calls;
- The original writ of garnishment, garnishee answer, payroll records showing wage withholding calculations and amounts, and all routing records;
- Ms. Morris's complete personnel file, records related to the April 13-16, 2026 administrative leave, investigation plans, notes, findings, and return-to-work documentation;
- Commissioner Dzadovsky's April 15, 2026 formal 12-question written inquiry, any written responses, the April 20, 2026 Commission meeting video recording and transcript, and all agenda materials for the May 4, 2026 special meeting;
- All court docket research conducted by City Attorney Hedges regarding Ms. Morris, including search queries, printouts, notes, and records of unrelated judgments disclosed;
- City employee handbook, written policies regarding garnishment processing, and records documenting prior practice of routing garnishments for Directors, Assistant Directors, and Commissioners directly to payroll;
- All records of the City Attorney's retention of outside employment counsel and any communications about restricting the City Manager's access to outside counsel;



- All communications with Sunland News or other media outlets regarding this matter; and
- All electronic systems, including City email servers, personal devices used for City business, HR systems, payroll systems, and court eFiling systems.

This preservation duty applies to all custodians including City Attorney Sara Hedges, City Manager Richard Chess, HR Manager Jared Sorensen, all City Commissioners, and the Mayor. The foregoing list is not exhaustive, and the City must preserve all information relevant to this action. Failure to preserve relevant evidence may constitute spoliation, which may subject the City to sanctions, adverse inference instructions, or other remedies in any subsequent litigation. This communication is made without waiver of any rights or remedies.

- Any records related to City Attorney Hedges's recommendation for a forensic audit of Ms. Morris and any communications regarding that recommendation;

Please respond to this demand by **May 4, 2026**. If you maintain that these claims are governed by an arbitration or other alternative dispute resolution process that precludes the filing of the same in court, please provide a copy of the same for our immediate review. Please direct all future correspondence regarding this matter to the attention of the undersigned counsel.

Pursuant to Florida Statute § 627.4137(1), Ms. Morris hereby requests that the City provide, within thirty (30) days of receipt of this written request, a statement under oath of a corporate officer or claims manager setting forth the following information with regard to each known policy of insurance, including excess or umbrella insurance, which does or may provide liability insurance coverage to pay all or a portion of any claim set forth in this correspondence: (a) the name of the insurer, (b) the name of each insured, (c) the limits of coverage, (d) a copy of the policy, and (e) a statement of any policy exclusions or defenses that the insurer may raise.

Sincerely,

A handwritten signature in blue ink, appearing to read "Denise Mutamba".

Denise Mutamba, Esq.
Founder & Managing Partner, MDM Legal, PLLC
Phone: (561) 872-3601
denise@mdmattorneys.com

cc: Linda Hudson (lhudson@cityoffortpierce.com)