

**IN THE CHANCERY COURT OF COFFEE COUNTY, TENNESSEE
FOURTEENTH JUDICIAL DISTRICT AT MANCHESTER**

STATE OF TENNESSEE,	)	
Petitioner,	)	
	)	
vs.	)	CASE NO.
	)	
JENNA RENEE AMACHER,	)	
Respondent.	)	

PETITION FOR WRIT OF QUO WARRANTO

COMES NOW, the State of Tennessee, by and through the Office of District Attorney for the 14th Judicial District, pursuant to TCA §29-35-101 et. seq. and files its Petition for Writ of Quo Warranto as follows:

1) Respondent, JENNA RENEE AMACHER, is a resident of an unincorporated area of Franklin County, Tennessee, residing at a residence with a mailing address of 762 Blue Creek Road, Tullahoma, TN 37388. Although the mailing address is for the zip code of Tullahoma, Tennessee, it is located outside the city limits of Tullahoma, Tennessee. (See Exhibit 1 to this Petition.)

2) Respondent was duly elected as alderman for the City of Tullahoma on or about August 6, 2020, and took such office on or about August 10, 2020.

3) At the time of the election and taking office, Respondent resided within the limits of the City of Tullahoma at 206 Amherst Drive, Tullahoma, Tennessee 37388.

4) However, on or about February 10, 2021, a mere six (6) months after taking office, Respondent sold her home. (See Exhibit 2 to this Petition.)

5) After the sale of her residence, Respondent no longer owned a residence within the Tullahoma City limits.

6) At or near the time of selling her residence on Amherst Drive, Respondent removed herself from the City of Tullahoma by residing at the Blue Creek Road residence.

7) Respondent has continued to reside at the Blue Creek Road residence since moving there.

8) Section 3 of the City of Tullahoma's Charter states "[n]o person shall be an Alderman unless he be a citizen of the State of Tennessee and a bona fide resident of the city for which he is elected." (See Exhibit 3 to this Petition.)

9) Further, Section 3 of the City of Tullahoma's Charter states that "[a]ny alderman, after his election removing from the city, thereby vacates his said office." (See Exhibit 3 to this Petition.)

10) Having sold her only residence within the City of Tullahoma and removing her primary place of abode from the City of Tullahoma, by operation of law and the plain language of the Charter of City of Tullahoma, Tennessee, Respondent has vacated her position as alderman for the City of Tullahoma and forfeited her right to exercise the power of its office.

11) Once vacated through living primarily outside the Tullahoma City limits, Respondent cannot reclaim the position by returning to Tullahoma but can only regain such position by election or, in limited circumstances, appointment.

12) Respondent has publicly and repeatedly acknowledged that she lives at the Blue Creek Road residence outside of Tullahoma with the hope of one day in the future building a home within Tullahoma.

13) Despite this, Respondent has failed and refused to cease and desist from exercising such authority and to acknowledge that she has lost her position.

14) Due to this, approximately 256 citizens of Tullahoma executed a complaint invoking the authority and obligation of the District Attorney for the 14th Judicial District to initiate this action pursuant to TCA §29-35-101 et. seq. to seek a writ of quo warranto to remove Respondent. (See Exhibit 4 to this Petition.)

15) The City of Tullahoma holds its Board of Mayor and Aldermen meetings within Coffee County, Tennessee, and the 14th Judicial District of Tennessee. Thus, the sole authority to pursue this matter rests with the District Attorney for the 14th Judicial District.

16) A writ of quo warranto is necessary to remove Respondent to allow the remaining and legally serving mayor and aldermen to appoint a qualified alderman to appropriately fulfill the duties of the position.

17) Petitioner would ask for an expedited trial and discovery process due to the exigent nature of this action and the limited factual scope.

WHEREFORE, Petitioner, by and through the District Attorney for the 14th Judicial District of Tennessee requests that this Court:

- 1) Grant its Petition for Writ of Quo Warranto.
- 2) Upon appropriate hearing of this matter, issue a writ of quo warranto declaring Respondent unfit to serve as alderman due to her removing herself from the City of Tullahoma.
- 3) Order an expedited discovery and trial schedule for its Petition.
- 4) Order Respondent to reimburse Petitioner for all of its reasonable attorney fees and other costs of this cause.
- 5) Order Respondent to pay all court costs associated with this cause.
- 6) Grant such other relief that is just proper in this cause.

Respectfully submitted,



Craig Northcott
District Attorney
14th Judicial District
409 Madison Street
Manchester, TN 37355

State of Tennessee Comptroller of the Treasury
Real Estate Assessment Data

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County Number: 026

County Name: FRANKLIN

Tax Year: 2021

Property Owner and Mailing Address

Jan 1 Owner:

AMACHER LEON
 599 BLACKBURN LN
 TULLAHOMA, TN 37388

Current Owner:

AMACHER LEON
 599 BLACKBURN LN
 TULLAHOMA, TN 37388

Property Location

Address: BLUE CRK RD 762

Map: 015 Grp: Ctrl Map: 015 Parcel: 091.00 PI: S/I: 000

Value Information

Reappraisal Year: 2017

Land Mkt Value: \$22,400

Improvement Value: \$254,600

Total Market Appraisal: \$277,000

Assessment %: 25

Assessment: \$69,250

General Information

Class:	00 - RESIDENTIAL		
City #:	000	City:	
SSD1:	000	SSD2:	000
District:	07	Mkt Area:	R01
# Bldgs:	1	# Mobile Homes:	0
Utilities - Water / Sewer:	03 - PUBLIC / INDIVIDUAL	Utilities - Electricity:	01 - PUBLIC
Utilities - Gas / Gas Type:	00 - NONE	Zoning:	

Subdivision Data

Subdivision: ROSE POINT

Plat Bk: 239B Plat Pg: Block: Lot: 15

Additional Description

Building Information

Building # 1

Improvement Type:	01 - SINGLE FAMILY	Stories:	2
Living/Business Sq. Ft.:	2,561		
Foundation:	02 - CONTINUOUS FOOTING	Floor System:	04 - WOOD W/ SUB FLOOR
Exterior Wall:	11 - COMMON BRICK	Structural Frame:	00 - NONE
Roof Framing:	02 - GABLE/HIP	Roof Cover/Deck:	13 - PREFIN METAL CRIMPED
Cabinet/Millwork:	04 - ABOVE AVERAGE	Floor Finish:	11 - CARPET COMBINATION

EXHIBIT

1

tabbles®

Interior Finish:	07 - DRYWALL	Paint/Decor:	04 - ABOVE AVERAGE
Heat and A/C:	08 - HEAT & COOLING PKG	Plumbing Fixtures:	10
Bath Tile:	01 - FLOOR ONLY	Electrical:	04 - ABOVE AVERAGE
Shape:	04 - IRREGULAR SHAPE	Quality:	01 - AVERAGE
Act Yr Built:	2003	Condition:	A - AVERAGE

Building Areas:

Area: BAS	Sq Ft: 2,358
Area: USL	Sq Ft: 675
Area: GRF	Sq Ft: 675
Area: EPF	Sq Ft: 256
Area: OPF	Sq Ft: 248
Area: OTT	Sq Ft: 104

Extra Features

Bldg/Card#	Type	Description	Units
1	DRIVEWAY	CONC	1
1	GAZEBO	12X12	144
1	MH OPEN PORCH FINISHED	4X36	144
1	FARM SHOP	36X51	1,836
1	ATTACHED SHED	12X28	336

Sale Information

Sale Date	Price	Book	Page	Vac/Imp	Type Instrument	Qualification
07/02/2002	\$15,000	314	79	VACANT	WD	A
08/21/1998	\$14,800	288	123	VACANT	WD	A
05/21/1997	\$13,800	279	397	VACANT	WD	A
08/30/1966	\$0	115	427			

Land Information

Deed Acres: 1.39	Calc Acres: 0.00	Total Land Units: 1.39
Land Type: 04 - IMP SITE	Soil Class:	Units: 1.39

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Document: 2292289, Document Title: Coffee County Register of Deeds- 206
Am...homa (Certified Copy).pdf

Office of the
Register of Deeds

Donna Toney

P.O. Box 178, Manchester, TN 37349
Phone (931) 723-5130 Fax (931) 723-8232

STATE OF TENNESSEE
COUNTY OF COFFEE

CERTIFICATION # 00001837

I, Donna R Toney, Register of Deeds, hereby certify this is a true and perfect copy of
Instrument Number, 21001451, Book Number, W409, page(s), 569, recorded in this office as a
WARRANTY DEED from AMACHER JENNA to DELUCENAY CHRISTOPHER, DELUCENAY
ANNA.

Witness the Official Signature and Seal this 27th day of April 2022.

Donna R Toney
Register of Deeds



This instrument prepared by:
Access Title & Escrow Inc
111 South Anderson St
Tullahoma, TN 37388

Send Tax Bills to property owner:
Christopher DeLucenay and
Anna DeLucenay
206 Amherst Drive
Tullahoma, TN 37388

WARRANTY DEED

Map-Parcel Numbers: 109K-C; 037.00

FOR AND IN CONSIDERATION of the sum of Ten Dollars, cash in hand paid by the hereinafter named grantees, and other good and valuable considerations, the receipt of which is hereby acknowledged, I, Jenna Amacher, unmarried, hereinafter called the grantor, have bargained and sold, and by these presents do transfer and convey unto Christopher DeLucenay and Anna DeLucenay, husband and wife, hereinafter called the grantees, their heirs and assigns, a certain tract or parcel of land in the 9th Civil District of Coffee County, State of Tennessee, described as follows, to-wit:

A certain tract or parcel of land lying and being in the 9th Civil District of Coffee County, Tennessee, being bounded and described as follows:

Being all of Lot No. 37 of the Macon Manor Subdivision, as shown on plat of record in Plat Cabinet 84B, Register's Office of Coffee County, Tennessee, to which plat reference is hereby made for a more complete and accurate description.

Subject to Restrictive Covenants of record in Book 307, page 852, Book 437, page 1017, and Book 478, page 746; to Boundary Line Agreement of record in Book 139, page 203; to HOA Charter of record in Book 327, page 798; to Right of Way Easement of record in Book 226, page 927; and Matters as shown on plat of record in Plat Cabinet 84B and Book 359, page 520, Register's Office of Coffee County, Tennessee.

Being the same property conveyed to JENNA AMACHER, by deed of record in Book 397, page 78, said Register's Office.

This is improved (X) or unimproved () property, known as :
206 Amherst Drive, Tullahoma, TN 37388

TO HAVE AND TO HOLD, the said tract or parcel of land, with the appurtenances, estate, title and interest thereto belonging to the said GRANTEEES, their heirs and assigns forever, and I do covenant with the said GRANTEEES that I am lawfully

WITNESS, our hand (s) this the 10th day of February, 2021.

Jenna Amacher
Jenna Amacher

STATE OF TENNESSEE
COUNTY OF Coffee

Personally appeared before me, a Notary Public in and for said County and State,
the within named Jenna Amacher, the bargainor with whom I am personally acquainted
or proved to me on the basis of satisfactory evidence, and who acknowledged that he/she
executed the within instrument for the purposes therein contained.

WITNESS my hand and official seal this the 10th day of February, 2021.

[Signature]
Notary Public

My Commission Expires: 3.22.23

State of Tennessee
County of Coffee

The actual consideration or value, whichever is greater, for this transfer is
\$ 320000-

[Signature]
Affiant

Subscribed and sworn to before me, this 10th day of February, 2021.

[Signature]
Notary Public

My Commission Expires: 3.22.23



CHARTER OF THE CITY OF TULLAHOMA, TENNESSEE¹**CHAPTER 553.****SENATE BILL NO. 352.**

AN ACT to incorporate the City of Tullahoma, in Coffee County, Tennessee,
and to provide a charter and mode of government for said municipality
and to prescribe punishment for violation of certain charter provisions.

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¹Acts 1903, ch. 553, is the current basic charter act for the City of Tullahoma, Tennessee. The text of the basic charter act set out herein includes all its amendments through the 2022 session of the Tennessee General Assembly. Sections of the charter which have been amended contain at the end of those sections the citation to the official private act or acts constituting the amendment or amendments. No other changes have been made to the charter except the addition of a table of contents to facilitate its use. A list of all the private acts including the basic charter appears at the end of the charter.

Acts which did not expressly or in effect amend any particular section or part of the basic charter, but which supplemented it, have been placed after the basic charter act as "Related Private Acts."

Acts of a temporary nature with no general or continuing application, such as bond authorization and validation acts have not been included in this compilation.



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Sec. 1. Be it enacted by the General Assembly of the State of Tennessee, That the City of Tullahoma, in the County of Coffee, and the inhabitants thereof, are hereby constituted a body politic and corporation by the style and name of the City of Tullahoma and shall have perpetual succession by the corporation name; may sue and be sued, plead and be impleaded, grant, receive, purchase and hold real, mixed and personal property, and dispose of the same for the benefit of said City, and may have and use a corporation seal and change it at its pleasure. [As replaced by Priv. Acts 1951, ch. 513, § 1]

Sec. 2. Be it further enacted, That the boundaries and corporate limits of the City of Tullahoma shall embrace and encompass the territory within the following boundaries, to wit: Beginning at a point on the West bank of Rock Creek, said point being the Southerly existing corporation corner, thence with

the meanders of Rock Creek approximately 1100 feet to a stake by a poplar tree on West Bank of Rock Creek; thence North 86 degrees 30 minutes West 1360 feet to a point, thence at right angles 980 feet to the existing corporate limit line; thence North 64 degrees 30 minutes West 2250 feet; thence North 25 degrees 00 minutes West 2710 feet; thence North 88 degrees 00 minutes West, 1020 feet; thence due north 370.5 feet; thence North 30 degrees 00 minutes West, 858 feet; thence South 52 degrees 30 minutes West 379.5 feet; thence due West 1930.5 feet; thence South 2 degrees 16 minutes East, 1268 feet; thence South 89 degrees 58 minutes West, 848.9 feet; thence North 2 degrees 17 minutes West, 3003 feet; thence North 87 degrees 44 minutes East, 589.9 feet; thence North 1 degree 00 minutes East, 1097.2 feet; thence South 67 degrees 30 minutes East, 527 feet; thence North 31 degrees 00 minutes East 420 feet; thence South 67 degrees 30 minutes East along southwesterly side of old Shelbyville Road to the Northwesternly intersection of the old Shelbyville Road and the City Dump Road, approximately 1725 feet; thence North 85 degrees 00 minutes East, along the northerly side of said old Shelbyville Road, to a stake in the boundary line between Ennis and Weeks; thence along property line North 3 degrees 4 minutes East 391.7 feet to a stake; thence North 31 degrees 5 minutes West 437.15 feet to an iron pipe; thence North 3 degrees 4 minutes West 877.7 feet to an iron pipe; thence South 75 degrees 9 minutes East 244.6 feet to an iron pipe; thence North 18 degrees 45¹ minutes 1052 feet to a point in the southeasterly corner of William Northern Field tract; thence in a northwesterly direction along an easterly boundary of William Northern Field Tract, approximately 1241.5 feet to the westerly side of Ledford Mill Road; thence northwesterly, along the westerly side of said Ledford Mill Road, 750 feet to William Northern Field property line; thence running eastwardly with the southerly line of William Northern Field property, 2023 feet to a marker on the westerly side of U. S. Highway 41A, thence crossing said Highway No. 41A, and running North 50 degrees 00 minutes East 580 feet to the westerly side of the Tullahoma-Normandy Gravel Road; thence South 37 degrees 30 minutes East, 680 feet; thence North 52 degrees 30 minutes East; 720 feet; thence North 65 degrees 45 minutes East, 1540 feet to the Tullahoma-Ovoca Road; thence South 22 degrees 30 minutes East, along the westerly side of Tullahoma-Ovoca Road, 880 feet; thence south 87 degrees East, 3910 feet to a point approximately 15 feet from the easterly side of the Old Ovoca Road; thence South 4 degrees 00 minutes West, 2660 feet; thence South 83 degrees 30 minutes East, 2300 feet; thence South 39 degrees 00 minutes East, 336 feet; thence North 31 degrees 30 minutes East, 2172 feet; thence North 52 degrees 30 minutes East, 1000 feet, to a point on southerly side of East Lincoln Street; thence continuing on said southerly margin North 49 degrees 30 minutes East 2000.1 feet in the easterly margin of

¹For redescription and annexations see § 1-109 in the code and the footnote thereto.

Wesley Street; thence South 32 degrees 30 minutes East 500 feet to the northwesterly corner of lot number one (1), Block "B" of the M. P. King Sub-Division; thence at right angles a distance of 150 feet to the northeasterly corner of said lot one (1) Block "B" in said sub-division; thence South 32 degrees 30 minutes East 1440 feet to the branch line of N. C. & St. L. right of way; thence South 51 degrees 00 minutes West parallel with said right of way 2763 feet to a point in southeasterly corner of the existing corporate limit line; thence running southwestwardly along the northerly right of way of the branch line of the N. C. & St. L. Railroad 4178 feet; thence at right angles and running southwardly 625 feet to Camp Forrest marker on the southerly side of East Carroll Street; thence running southwestwardly, with Camp Forrest property line, 810 feet; thence running southeastwardly with said Camp Forrest property line, 1155 feet; thence at right angles and running northeastwardly, 1570 feet to a point in Camp Forrest property line, which point is approximately 600 feet North of Forrest Boulevard; thence at right angles and running southeastwardly, along the westerly side of Camp Forrest Road, 3948 feet to the Coffee-Franklin County line; thence running southwestwardly with the Coffee-Franklin County line 4110 feet to the easterly right-of-way of the main line of the N. C. & St. L. Railroad; thence running northwardly with the easterly right of way of said N. C. & St. L. Main line, 3302 feet; thence South 55 degrees 45 minutes West 4750 feet to a point on West bank of Rock Creek, same being the point of beginning. [As amended by Priv. Acts 1905, ch. 347; Priv. Acts 1923, ch. 510; Priv. Acts 1931, ch. 466; replaced by Priv. Acts 1943, ch. 334, § 1; Priv. Acts 1951, ch. 513, § 2; and Priv. Acts 1953, ch. 466, § 1]

Sec. 2A. Be it further enacted, That all the property within the boundaries defined in Section 2 hereof shall be within the corporate limits of the City of Tullahoma, Tennessee, and subject to taxation by said City, as other property is now taxed, provided that any property brought within the corporate limits of said City by this Act which was not heretofore in said limits, shall not be liable for tax by said City for the year 1951. [As added by Priv. Acts 1943, ch. 334 § 1; amended by Priv. Acts 1951, ch. 513, § 1(3); and replaced by Priv. Acts 1951, ch. 513, § 2]

Sec. 2B. Be it further enacted, That it is expressly forbidden and shall be unlawful for any public and/or private utility, firm, partnership, association and/or corporation, or any person, other than the City of Tullahoma municipally owned and operated Electric Power System, and the Tennessee Valley Authority, to extend any electric power line or lines, and/or electric power services for the purposes of furnishing electricity to consumers, into and within the corporate boundary lines of the City of Tullahoma as herein and hereby established. [As added by Priv. Acts 1943, ch. 334, § 1, and replaced by Priv. Acts 1951, ch. 513, § 2]

Sec. 3. Be it further enacted, That the legislative and supervisory power of the city is vested in the Board of Mayor and Aldermen elected under this charter. The Board of Mayor and Aldermen shall consist of the Mayor and six (6) members, chosen by the qualified voters of the city. No person shall be an Alderman unless he be a citizen of the State of Tennessee and a bona fide resident of the city for which he is elected. Any alderman, after his election removing from the city, thereby vacates his said office. [As amended by Priv. Acts 1951, ch. 513, § 1(3)]

Sec. 4. Election, organizational meeting; persons entitled to vote. Any election for Mayor and Aldermen required in Section 5 shall be held on the first Thursday in August. The newly elected Mayor and Aldermen shall be sworn into office and organize on the second Monday in August following their election.

In all elections and referendums held in the City for any purpose, persons who are qualified to vote for members of the General Assembly and who have resided in the City's corporate limits for a time sufficient to be qualified voters in accordance with general law shall be qualified to vote in a City election or referendum. Persons who reside outside the City's corporate limits, but who are a resident of Coffee, Franklin, Bedford or Moore counties and who own, within the City's corporate limits, at least fifty percent (50%) freehold interest in real property, commercial or residential, and assessed for real estate tax purposes for five thousand (\$5,000) or more, shall be qualified to vote in a City election or referendum. However, no more than two (2) persons, based upon the ownership of an individual tract of property regardless of the number of property owners shall be permitted to vote. Such election shall be held as now and as may hereafter be provided by the laws of the State of Tennessee for such elections. [As amended by Priv. Acts 1907, ch. 405, § 1; replaced by Priv. Acts 1974, ch. 241, § 1; and Priv. Acts 1983, ch. 8, § 1; and amended by Priv. Acts 2008, ch. 103, § 10]

Sec. 5. Terms of office, vacancies. The terms of the Mayor and two aldermen elected on the first Thursday in August 2020 shall be extended from the first Thursday in August 2023 until the first Thursday in August 2024, or until their successors are elected and qualified. This will result in an increase of approximately twelve months in the terms of the mayor and aldermen elected in August 2020. Thereafter, elections will be held for these seats for a four year term beginning with the elections held in August 2024.

The terms of the two aldermen elected on the first Thursday in August 2018 shall be extended from the first Thursday in August 2021 until the first Thursday in August 2022, or until their successors are elected and qualified. This will result in an increase of approximately twelve months in the terms of the aldermen elected in August 2018.

The terms of office of the two aldermen elected in August 2019 shall not be effected nor extended.

The three candidates who receive the highest number of votes in the August 2022 election shall each be elected for a four year term and thereafter, elections will be held for these seats every four years beginning with the elections held in August 2026.

The candidate receiving the fourth highest number of votes in the August 2022 election shall be elected for a two year term, until the first Thursday in August 2024, or until their successors are elected and qualified. Thereafter, elections will be held for this seat every four years beginning with the elections held in August 2024.

In the event of the vacancy by reason of the death, resignation, or removal of the Mayor or any one (1) or more of the Aldermen, the Board shall have the power to fill the vacancy or vacancies by majority vote of said Board of Mayor and Aldermen, said vacancies to be filled until the expiration of the term of office so vacated. Any appointment(s) required in this section shall be made by majority vote of the Board of Mayor and Aldermen within one month of any vacancy. The Mayor and any Aldermen elected under the provisions of this section shall be so elected until their successor is elected and qualified; except as otherwise provided in the Charter of the City of Tullahoma. [As amended by Priv. Acts 1907, ch. 405, § 1; replaced by Priv. Acts 1974, ch. 241, § 2; amended by Priv. Acts 1979, ch. 59, § 2; and replaced by Priv. Acts 1983, ch. 8, § 2; amended by Priv. Acts 2005, ch. 40; and replaced by Priv. Acts 2021, ch. 17]

Sec. 6. Be it further enacted, That from the date of the passage of this Act, until the election and qualifications of the Mayor and Aldermen provided in this charter, the Board of Mayor and Aldermen of said City of Tullahoma shall be and consist of the present Mayor and Aldermen thereof, to wit: John B. Carroll, Mayor; M. Troxler, Frank McDowell, George Book, W. R. Marshall, Lee Hudson and J. Hufsteller, aldermen, or any successor that may be elected under the provisions of this Act to fill any vacancies that may occur in said board by reason of the death, resignation or removal of any one or more of said Mayor or Aldermen; provided, also, that said Board of Mayor and Aldermen above designated, shall remain in office until their successors are duly elected and installed. [As amended by Priv. Acts 1951, ch. 513, § 1(3)]

Sec. 7. Be it further enacted, That no person shall be elected Mayor who is not at the time of his election a citizen of the State of Tennessee and a bona fide resident of the city. When two or more shall have an equal number of votes for the office of Mayor, the election shall be decided by the majority of the votes of the council-elect. The Mayor may fill all vacancies occurring in any office except the Aldermen, until the same be filled by the election by the Board of Mayor and Aldermen. It shall be the duty of the Mayor to preside at all meetings of the Mayor and Aldermen, to see that all the ordinances of the city

October 3, 2022

Hon. Craig Northcott
District Attorney General
14th Judicial District
409 Madison Street
P.O. Box 1844
Manchester, TN. 37355

RE: Complaint of Official Misconduct Regarding Tullahoma Alderman Jenna Amacher

Dear General Northcott,

I have enclosed for your consideration multiple counterparts of a Complaint of Official Misconduct regarding Tullahoma Alderman Jenna Amacher. As you will note there are over 270 signatures of citizens and residents of Tullahoma on the complaints. The signatures were collected from September 23 to October 3, 2022.

It is respectfully requested that the Office of District Attorney General to forthwith investigate this complaint and if reasonable cause is found for such complaint to institute proceedings to oust Jenna Amacher from the office of Alderman of the City of Tullahoma, Tennessee in a court of competent jurisdiction, all in accordance with Tenn. Code Ann. § 8-47-103.

Thank you for your consideration .

Very Truly Yours,


SCOTT VAN VELSOR



COMPLAINT OF OFFICIAL MISCONDUCT

TO: Hon. C. Craig Northcott
District Attorney General
14th Judicial District of Tennessee
409 Madison Street
Manchester, TN 37355

The undersigned citizens of the City of Tullahoma, Tennessee submit the following complaint of misconduct in office on the part of Tullahoma City Alderman, Jenna Amacher:

Alderman Amacher has knowingly and willfully exercised the legislative and supervisory powers of the office of Alderman of the City of Tullahoma despite knowing that she was not qualified to exercise such powers because she is not a bona fide resident of the City of Tullahoma as specifically mandated in Section 3 of the Tullahoma City Charter. Based on information acquired by the undersigned, Alderman Amacher resides outside the corporate boundary of the City of Tullahoma, Tennessee.

The undersigneds respectfully submit that Alderman Amacher in exercising the powers of the public office of Alderman of the City of Tullahoma with knowledge that she lacks the residency qualifications to hold said office and exercise the powers associated therewith constitutes "willful misconduct in office," which is a ground for ouster from office pursuant to Tenn. Code Ann. § 8-47-101.

The undersigneds respectfully request the District Attorney General to forthwith investigate this complaint and if reasonable cause is found for such complaint to forthwith institute proceedings to oust Jenna Amacher from the office of Alderman of the City of Tullahoma, Tennessee in a court of competent jurisdiction, all in accordance with Tenn. Code Ann. § 103.

Respectfully submitted,

Name

Address

Susan S. Clin
Susan L Hawkins
Gary Nester
Bob Lee
Mike Adams
Joe Lee

1206 Greenwood Ave, Tullahoma
109 Stagecoach Pass, Tullahoma
308 Lee Street Tull, TN 37388
308 Lee Street Tullahoma TN 37388
907 Country Club Dr. Tullahoma, TN
2011 Country Club Dr. Tullahoma 37388

Name

M. L. Suena

Address

116 FAIRWAYS BLVD. N. ^{WILLIAMSON, IN 47388}

COMPLAINT OF OFFICIAL MISCONDUCT

TO: Hon. C. Craig Northcott
District Attorney General
14th Judicial District of Tennessee
409 Madison Street
Manchester, TN 37355

The undersigned citizens of the City of Tullahoma, Tennessee submit the following complaint of misconduct in office on the part of Tullahoma City Alderman, Jenna Amacher:

Alderman Amacher has knowingly and willfully exercised the legislative and supervisory powers of the office of Alderman of the City of Tullahoma despite knowing that she was not qualified to exercise such powers because she is not a bona fide resident of the City of Tullahoma as specifically mandated in Section 3 of the Tullahoma City Charter. Based on information acquired by the undersigned, Alderman Amacher resides outside the corporate boundary of the City of Tullahoma, Tennessee.

The undersigneds respectfully submit that Alderman Amacher in exercising the powers of the public office of Alderman of the City of Tullahoma with knowledge that she lacks the residency qualifications to hold said office and exercise the powers associated therewith constitutes "willful misconduct in office," which is a ground for ouster from office pursuant to Tenn. Code Ann. § 8-47-101.

The undersigneds respectfully request the District Attorney General to forthwith investigate this complaint and if reasonable cause is found for such complaint to forthwith institute proceedings to oust Jenna Amacher from the office of Alderman of the City of Tullahoma, Tennessee in a court of competent jurisdiction, all in accordance with Tenn. Code Ann. § 103.

Respectfully submitted,

Name

Address

① <u>Jacqueline Iles</u> <u>Jacqueline Iles</u>	<u>205 Linkside Drive</u> <u>Tullahoma, TN 37388</u>
② <u>Roy W. Phelps</u> <u>Roy W. Phelps</u>	<u>201 Lake Circle Dr</u> <u>Tullahoma, TN 37388</u>
③ <u>Susan Campbell</u> <u>Susan Campbell</u>	<u>1804 Country Club Dr.</u> <u>Tullahoma TN 37388</u>

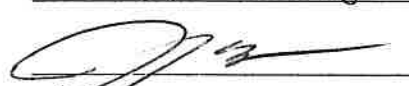
Name

Address

- | | |
|--|---|
| ④ Jill Albro
Jill Albro | 608 Twelve Oaks Rd.
Tullahoma |
| ⑤ Lesley Lawson
Lesley Lawson | 304 Somerset Lane
Tullahoma TN 37388 |
| ⑥ Mike Stanton
Mike Stanton | 311 Heights Ave
Tullahoma, Tr, 37388 |
| ⑦ Sara Stanton
Sara Stanton | 311 Heights Ave
Tullahoma, TN 37388 |
| ⑧ Robin Guidici
R. G. | 512 NE ATLANTIC ST. Tullahoma, TN 37388 |
| ⑨ Adam Moon
Adam Moon | 2100 Ovoca Rd
Tullahoma, TN 37388 |
| ⑩ Deidre Moon
Deidre Moon | 2100 Ovoca Rd
Tullahoma, TN 37388 |
| ⑪ Noel Clements
Noel Clements | 711 Westside Dr
Tullahoma TN 37388 |
| ⑫ Annie Clements
Annie Clements | 711 Westside Dr
Tullahoma TN 37388 |
| ⑬ Lucy Boss
Lucy Ann Boss | 713 Westside Dr.
Tullahoma, TN |
| ⑭ Elizabeth Jordan
Elizabeth Jordan | 103 Fairways Blvd. Tullahoma, TN
37388 |

Name

Address

- | | |
|---|--|
| (15) <u>David Woodward</u>
David Woodward | 128 Hunters Ridge Dr.
Tullahoma, TN 37388 |
| (16) <u>Helen Woodward</u>
Helen Woodward | 128 Hunters Ridge Dr.
Tullahoma, TN 37388 |
| (17) <u>Laurel Stone</u>
Laurel Stone | 114 E. Moore St.
Tullahoma, TN 37388 |
| (18) <u>Mike Young</u>
Mike Young | 111 Parkway Place
Tullahoma, TN 37388 |
| (19) <u>Michael Holiday</u>
Michael Holiday | 314 Highland Dr.
Tullahoma, TN 37388 |
| (20) <u>John W. Knight</u>
 | 102 Huntington Pl
Tullahoma, TN 37388 |
| (21) <u>Hessie Warren</u>
Hessie Warren | 110 Tullahoma Hummeryard Dr.
Tullahoma, TN 37388 |
| (22) <u>Cynthia Ailey-Darago</u>
Cynthia Ailey-Darago | 401 Lake Hills Rd
Tullahoma TN. 37388 |
| (23) <u>Bob Bates</u>
Bob Bates | 501 MARBURY Rd.
TULLAHOMA, TN. 37388 |
| (24) <u>Benjamin H. Murray</u>
Benjamin H. Murray | 105 Old Hickory Dr.
Tullahoma, TN 37388 |
| (25) <u>Sara W. Derington</u>
Sara W Derington | 604 Twelve Oaks Rd, Tullahoma
Tullahoma, TN |

COMPLAINT OF OFFICIAL MISCONDUCT

TO: Hon. C. Craig Northcott
District Attorney General
14th Judicial District of Tennessee
409 Madison Street
Manchester, TN 37355

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Respectfully submitted,

Name

Address

① <u>William Desirington</u>	<u>604 Twelve Oaks Rd</u>
<u>William Desirington</u>	<u>Tullahoma, TN</u>
② <u>Marguerite Moyer</u>	<u>220 Lake Circle Drive</u>
<u>Marguerite Moyer</u>	<u>Tullahoma, TN 37388</u>
③ <u>Robert B. Moyer</u>	<u>320 Lake Circle</u>
<u>Robert B. Moyer</u>	<u>Tullahoma, TN 37388</u>

Address

- | | | |
|---|---|--|
| ④ | Corynn Moyers
Corynn Moyers | 305 Marbeth Ln
Tullahoma, TN 37388 |
| ⑤ | Ed W
Edward Moyers | 305 Marbeth Ln
Tullahoma, TN 37388 |
| ⑥ | George A Stone
George A. Stone | 106 Wilkins Drive
Tullahoma, TN 37388 |
| ⑦ | Renate Stone
Renate Stone | 106 Wilkins Drive
Tullahoma, TN 37388 |
| ⑧ | Chelsea Clark
Chelsea Clark | 117 Swift Ln
Tullahoma, TN 37388 |
| ⑨ | Michelle Carmack
Michelle Carmack | 105 Regwood Drive
Tullahoma, TN 37388 |
| ⑩ | Aaron Carmack
Aaron Carmack | 105 Regwood Drive
Tullahoma TN 37388 |

COMPLAINT OF OFFICIAL MISCONDUCT

TO: Hon. C. Craig Northcott
District Attorney General
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Manchester, TN 37355

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Respectfully submitted,

Name

Address

Ronald B. Gustin
Paul B. Patterson
Paul A. Bald
Ann A. Baldwin
Edward D. Koney
John L. Kelly

205 Lakewood Drive, Tullahoma, TN
211 Regwood Drive, Tullahoma, TN
205 Skyview Ln Tull.
205 Skyview Ln - Tullahoma, TN
102 Dargatzis Pl Tullahoma
103 Lassie Pl Tullahoma

Name

Address

Allen R. Craig

1007 W. Lincoln St Tullahoma

~~Donna Traversa~~

117 Kingsridge Blvd Tullahoma

Jane Traversa

117 Kingsridge Blvd, Tullahoma

Joseph J. Mann

285 Spring Breeze RR, Tullahoma

Barbara Munce

211 Daffodil Drive, Tullahoma

Beth Leskle

324 Parkway Rd, Tullahoma

~~Thomas~~

136 Elise Cir Tullahoma TN 37388

Chris Brit

85 Daffodil Drive Tullahoma TN 37388

Amy R. J.

204 Williamsburg Circle Tullahoma

Sandy Gindaman

1807 Country Club Dr.

Robert Lide

1807 Country Club Dr.

Kay Kelly

1809 COUNTRY CLUB DR

Robert Allen

510 Wanda Ln., Tullahoma, TN 37388

T. Campbell

1804 COUNTRY CLUB, TULLAHOMA, TN 37388

Alfred Gregg

200 Broadrick St, Tullahoma TN 37388

Alexis Burke

200 Broadrick St Tullahoma TN 37388

Nicole Payer

717 Stone Blvd. Tullahoma, TN 37388

M. C.

101 Somerset Ln Tullahoma, TN

Barndolyn R. Reese

1810 Country Club DR, Tullahoma, TN

Sharon Pelus

209 LAKE HILLS Rd. Tullahoma

J. Arzda Hatfield

1001 Westwood Drive, Tullahoma TN

Name

Address

John B. Iker

108 Lannon Circle Tullahoma

Judith A. Hart

108 Lannon Circle Tullahoma ^{Laurens}

Frances B. Gray

121 Autumn Ln, Tullahoma

Jim L. Gray

121 Autumn Lane Tullahoma

Keri Schaefer

100 Davenshire Street Tullahoma

B. Smith

100 Davenshire St Tullahoma

COMPLAINT OF OFFICIAL MISCONDUCT

TO: Hon. C. Craig Northcott
District Attorney General
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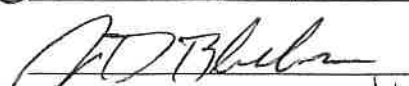
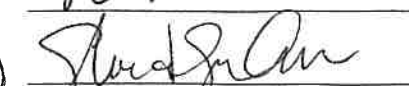
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Respectfully submitted,

Name

Address

① Marian Galbraith	1811 Country Club Dr. / Tullahoma
② Justin D Blackwell	213 Lake Circle Dr. / Tullahoma
③  Ryan Blackwell	213 Lake Circle Dr. Tullahoma, TN 37388
④  Gwendolyn Carr	212 BRAGG CIRCLE TULLAHOMA TN 37388

Name

Address

⑤ Ryan Woodward
Ryan Woodward

403 Hood Dr
Tullahoma, TN 37388

⑥ Shane Woodward
Shane Woodward

403 Hood Dr
Tullahoma, TN 37388

⑦ ~~J. Ashli Shockley~~
J. Ashli Shockley

1104 Pickett Dr
Tullahoma TN 37388

⑧ ~~Jason Shockley~~
Jason Shockley

1104 Pickett Dr
Tullahoma TN 37388

⑨ ~~Jessie Richardson-Schweers~~
Jessie Richardson-Schweers

1913 Bel Ave Drive
Tullahoma, TN 37388

⑩ ~~David Clark~~
David Clark

1645 Old Shelbyville Hwy
Tullahoma TN 37388

⑪ Ashley Rose-Nalin

108 Point Circle
Tullahoma, TN 37388

⑫ Bethany Sterling
Bethany B. Sterling

106 Quail Dr.
Tullahoma, TN 37388

⑬ Betsy W. Elam
Elizabeth (Betsy) Elam

216 Lake Circle Drive
Tullahoma, TN 37388

⑭ Amanda Watkins
Amanda Walker

119 Elise Circle
Tullahoma, TN 37388

Name

Address

(15) Jimmy Bradford
Jimmy BRADFORD

515 S. Roosevelt ST.
Tullahoma, TN. 37388

(16) Erin Wilson
Ed Wilson

204 Virginia Drive
Tullahoma, TN 37388

(17) KATIE DAVENPORT

210 LAKE CIRCLE DRIVE, TULLAHOMA TN

(18) Jamie Davenport

210 Lake Circle Dr., Tullahoma TN 37388

(19) CHRISTOPHER GAITHER

21 CLAREMONT CIRCLE
TULLAHOMA TN 37388

(20) Molly Marcum
Moeley

1000 OVOCA RD. TULLAHOMA, TN
37388

(21) Erin Murray
Erin Murray

105 Old Hickory Dr
Tullahoma, TN 37388

(22) Jessica Womack
Jess Womack

910 Westwood DR
Tullahoma, TN 37388

(23) Jason T. Good

Tullahoma, TN 37388
103 Oak Ct.

(24) Elizabeth Good

103 Oak Ct.
Tullahoma TN 37388

(25) Sarah Ashby
Sarah Ashby

109 Lake Crest Ln.
Tullahoma, TN 37388

Name

Address

Lean W. Hoshold
Kari Anna Clary
~~Shannon M. Mason~~
~~W. H. H.~~

105 Royal Ct Tulboma
104 Lake Circle Drive
106 Huntington Place
107 Kings Place

Jamie S. Trumble
Kristin Lund
Kiran Pley
Selen Strain

107 Kings Place
115 FAIRWAYS BLVD N
109 Lake Crest Ln
304 White Oak St.

Rachel Ferrell

113 Picard Dr.

James H. H. H.

218 Fairway Blvd N

Janice W. Haelton

218 Fairways Blvd N

Hannel Dunlap

313 Kingsridge Blvd.

Dana Dunlap

313 Kingsridge Blvd.

Marquitta Masuda

312 Kingsridge Blvd.

Mark D. Masuda

312 KINGSRIDGE BLVD

John M. Clary

104 Lake Circle Drive

Jan B.

113 Stagecoach Pass

D. B.

113 Stagecoach Pass

W. H. H.

2009 Country Club

W. H. H.

2017 COUNTRY CLUB DR.

W. H. H.

2009 Country Club Dr.

W. H. H.

2011 Country Club Dr. Tulboma

Name

Address

Sheila Seay
Dany H. Wood
Sandra Ann Klenakis
L.B. Klenakis
Jim Brubaker

306 Westside Hts Dr, Tulsa
101 Royal Court Tullahoma
1709 Country Club Drive
1209 Country Club Dr.
109 Royal Ct Tullahoma

COMPLAINT OF OFFICIAL MISCONDUCT

TO: Hon. C. Craig Northcott
District Attorney General
14th Judicial District of Tennessee
409 Madison Street
Manchester, TN 37355

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Respectfully submitted,

Name

Address

Susan J. Clin

1206 Greenwood Ave, Tullahoma

Susan L Hawkins

107 Stagecoach Pass, Tullahoma

Jerry Neeter

308 Lee Street Tull, TN 37388

Ernie Lee

308 Lee Street Tullahoma TN 37388

Michael D. Dwyer

907 Country Club Dr. Tullahoma, TN

Joe L. L. L.

2011 Country Club Dr. Tullahoma 37388

Warren Caw

1320 HARTON BLVD. TULLAHOOMA TN

Name

Address

125 Mores

104 Links Pl

409 E. Grizzards St

321 Crest dr

409 E. Grizzard St

207 Blue Creek Lane

200 B. St

200 B. St

1823 W. Lincoln St

103 Hobson Dr

11 Central Ave.

11 Central Ave

200 SWIFT LN

110 Westside Dr

214 Heights Ave

210 MOUNTAIN

201 George LN

201 George Ln

240 Williamsburg Cir

323 Helen Street

214 Heights Ave

214 Heights Ave

57 Lewis Hollow Ln

100 Berry Ct

100 Berry Ct

2017 COUNTRY CLUB DR Tullahoma TN 37388

104 Links Pl Tullahoma TN 37388

409 E. Grizzards St Tullahoma TN 37388

321 Crest dr, tullahoma TN 37388

409 E. Grizzard St

207 Blue Creek Lane Tullahoma, TN 37388

200 B. St Tullahoma TN

200 B. St - Tullahoma TN

1823 W. Lincoln St Tull

103 Hobson Dr

11 Central Ave.

11 Central Ave

200 SWIFT LN Tull

110 Westside Dr

214 Heights Ave

210 MOUNTAIN

201 George LN Tullahoma TN 37388

201 George Ln Tullahoma TN 37388

240 Williamsburg Cir. Tullahoma TN 37388

323 Helen Street Tullahoma TN 37388

214 Heights Ave, Tullahoma

214 Heights Ave Tullahoma

57 Lewis Hollow Ln Tullahoma

100 Berry Ct Tullahoma TN

100 Berry Ct TULLAHOMA

Name

Address

Chinaq Ragsdale

240 Williamsburg Circle

Devin Ragsdale

240 Williamsburg Circle

Ashley Gipson

502 Twelve oak Rd

Fred Duffus

109 Hunters point

Brandy Ray

309 N College St

Jody Johnson

302 Marks Avenue

Christa Johnson

302 Marks Avenue

Erica Hill

822 South Jefferson Street

Johnathan Hill

822 South Jefferson Street

Kaleb Hickerson

103 Dicks Drive

Janeva Bell

East Gate

Caligh Johnson

302 Marks Avenue

Geoff Hales

307 Hillwood Rd Tullahoma

Spur Douglas

135 Gad Redd Road Tullahoma

Delus Douglas

1600 N. Washington Street

Kristen Wilkerson

501 S Washington St

R. A. Barth

303 Crest Dr.

Angela Muse

102 Fairway Blvd W.

~~John~~

1000 S Jackson St

Carl Hick

604 E. Moore St.

Michael Fagg

604 E. Moore St.

Kevin Randall

601 E. Moore St # 3

Troy Vane

108 E. Side Dr.

Mark Simpson

112 Breezy Court

COMPLAINT OF OFFICIAL MISCONDUCT

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District Attorney General
14th Judicial District of Tennessee
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Manchester, TN 37355

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Respectfully submitted,

Name

Address

Sheri Cunningham

507 Westside Heights Drive, Tullahoma, TN 37388

Paula

123 Breckenridge Rd Tullahoma

Tracy Wheeler

123 Breckenridge Rd Tullahoma TN 37388

Earl E. Custalogn

411 white oak st Tullahoma

Debbie A. Wheeler

907 Ovoca Rd. Tullahoma TN

Brian Wheeler

907 Ovoca Rd Tullahoma

COMPLAINT OF OFFICIAL MISCONDUCT

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Respectfully submitted,

Name

Address

L. A. Coker

707 Twelve Oaks Rd.

Vickie Shetton

11 Kensington Lane

James J. Moore

205 Short Springs Road

John L. Moore

205 Short Springs Rd.

Carolyn Marks

2 Chadsworth Pl.

Karen Lynn Van Ratten

100 Chadsworth Pl, Tullahoma, TN

Name

Address

Vicki Collinsworth
Robert Van Patton
Jellis Sinclair
Pam Grims
~~Donna~~
Susan Arnold
K. Ford
Lucy Leguina
C. G. Day
Chris Warren
Susan W. Douglas
Frieda Agnes
C. G. H. K.
J. D. Waller
Chris Ray

4 Chadsworth Place, Tullahoma, TN 37388
100 CHADSWORTH PL - TN - 37388
1 Chadsworth Place Tullahoma 37388
5 Chadsworth Place Tullahoma 37388
5 Chadsworth Place Tullahoma 37388
604 TWEE OAKS RD TULLAHOMA
604 TWEE OAKS RD TULLAHOMA
1500 Wilson Ave Tullahoma
2nd St. Tullahoma, TN
105 KINGSLIDGE BLVD TULLAHOMA TN 37388
308 Kingsridge Blvd. Tullahoma, TN
8 Chadsworth Pl Tullahoma, TN 37388
104 Carnoustie Ct. Tullahoma, TN 37388
607 BRAGG CIRCLE, TULLAHOMA
915 Maplewood Ave " 37388
",

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District Attorney General
14th Judicial District of Tennessee
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Manchester, TN 37355

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Respectfully submitted,

Name

Address

Erica Hill	822 South Jefferson Street / Tullahoma
Samantha Niba	907 S. Franklin St Tullahoma
Daryl McFee	404 Weaver St. Tullahoma
Shauna Blahn	409 Weaver St. Tullahoma
Isaiah McGee	600 Glendale Pl. Tullahoma
Annette Keas	404 Weaver St Tullahoma

Name

Alondra McQueen

ARIEL Vaughn

Emily Raths

Address

907 S. Franklin St.

907 S. FRANKLIN STREET

102 Windbriar Drive

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Respectfully submitted,

Name

Address

James S. Woodward
Mickey Cuytka
Richard Cuytka
Don Jones
Lisa Dye
Nat Dull

115 Breckenridge Tullahoma 37388
125 Middleton Ct, Tullahoma 37388
125 Middleton Ct. Tullahoma 37388
200 S. Washington St. 37388
134 Thomaswood Chase 37388
135 WOODMONT DRIVE

Name

Address

✓ Robert H. Galt ✓
Marlene May

37388
201 ALBEMARLE DR TULLAHOMA, TN
102 CHADWORTH PL. TULLAHOMA, TN 37388

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Manchester, TN 37355

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Alderman Amacher has knowingly and willfully exercised the legislative and supervisory powers of the office of Alderman of the City of Tullahoma despite knowing that she was not qualified to exercise such powers because she is not a bona fide resident of the City of Tullahoma as specifically mandated in Section 3 of the Tullahoma City Charter. Based on information acquired by the undersigned, Alderman Amacher resides outside the corporate boundary of the City of Tullahoma, Tennessee.

The undersigneds respectfully submit that Alderman Amacher in exercising the powers of the public office of Alderman of the City of Tullahoma with knowledge that she lacks the residency qualifications to hold said office and exercise the powers associated therewith constitutes "willful misconduct in office," which is a ground for ouster from office pursuant to Tenn. Code Ann. § 8-47-101.

The undersigneds respectfully request the District Attorney General to forthwith investigate this complaint and if reasonable cause is found for such complaint to forthwith institute proceedings to oust Jenna Amacher from the office of Alderman of the City of Tullahoma, Tennessee in a court of competent jurisdiction, all in accordance with Tenn. Code Ann. § 103.

Respectfully submitted,

Name

Address

CHAD MARCUM

1002 OVUCA RD. TULLAHOMA, TN

Leslie Church

502 LAKE HILLS TULLAHOMA, TN

Don Marcum

414 WILSON AVE. TULLAHOMA, TN

Stacy Kelly

1412 Ovoca Lake Rd Tullahoma TN

COMPLAINT OF OFFICIAL MISCONDUCT

TO: Hon. C. Craig Northcott
District Attorney General
14th Judicial District of Tennessee
409 Madison Street
Manchester, TN 37355

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Respectfully submitted,

Name

Address

John R. Rickman
Barbara Rickman

202 Victoria Ct. - Tullahoma
202 Victoria Ct - Tullahoma

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Respectfully submitted,

Name

Address

Dorothy C. Watson
Thomas C. Watson A

111 Kings Place, Tullahoma, TN
111 KINGS PLACE, TULLAHOMA, TN

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Blank lined paper with horizontal ruling lines.