

**SHELBY COUNTY GOVERNMENT
SWORN COMPLAINT**

**Code of Ethics
Section 18-57(e)**

This form may be used to report alleged violations of the Shelby County Code of Ethics or any state law.

Part I

IDENTIFYING INFORMATION

1. Complainant

a. Name (first name, initial, and last name)

b. Mailing or street address (room, apt., suite no. and street, or P.O. box)

c. City, state, zip code

d. Telephone

e. E-mail (if available)

2. Alleged Violator(s)

a. First and last name of each alleged violator

Edward L. Stanton, Jr.

b. List the Position or Title of each alleged violator

General Sessions Court Clerk

c. Mailing or street address of each alleged violator

140 Adam Avenue
Memphis, TN 38103

Part II

STATEMENT OF JURISDICTION

1. Provide a short and plain statement of the nature of the violation(s).

Under the authority of the General Sessions Court Clerk's Office, Edward L. Stanton, Jr., during the time period of September/October 2013, unlawfully and knowingly committed an act relating to his office that constituted an unauthorized exercise of official power as the elected General Sessions Court Clerk of Shelby County, Tennessee, engaged in coercion to obtain political donations or support and knowingly committed such an unlawful action under the color of his office that exceeded his official power of appointed staff.

These unlawful and knowingly acts are prohibited by annotated codes of the State of Tennessee.

2. List each law or rule (providing the specific citation, if known) allegedly violated.

Each violation aforementioned in the above paragraph is prohibited by State of Tennessee law cited under T.C.A. 39-16-402

Part III

STATEMENT OF FACTS

State all facts that constitute each alleged violation. State the dates upon which (or the time period within which) each violation allegedly occurred. Attach additional sheets as needed, signing and numbering each page.

#1

During the time period of September/October 2013, I spoke via telephone with an individual who was speaking on behalf of the General Sessions Court Clerk, Edward L. Stanton, Jr. The individual related a message from the Clerk. The content of the message was that the Clerk was somewhat perturbed or upset that I had not made a political donation to his campaign fund. The Clerk's issue with my non-participation (political donation) was that I was the third highest paid person in the organization and had not acted. I indicated that I had not made a donation and was not planning to participate in such political activities. I farther explained that my resentment was due primarily to previous experiences regarding such political activities related the previous General Sessions Court Clerk's administration, at which time I was Chief Administrative Officer. The criminal investigation of the aforementioned case, which was pursued by the Shelby County District Attorney's Office, yielded that the previous Clerk was in violation of state

statue, even though there were no political donations made by General Sessions Court Clerk's Office employees nor there were no employees terminated.

Con't additional pages

Initial Here If Any Additional Pages Are Attached _____

Part IV

SUPPORTING DOCUMENTATION

List all documents and other materials in your possession that are relevant to this complaint.

Statement of Facts Con't

The individual proceeded to state that there were two other appointees on the Clerk's executive staff that had not made donations as well. Additionally, the individual indicated that the Clerk was considering making some changes at the beginning of the upcoming New Year (2014) if things did not change (referencing to his previous statement of making political donations). At this point, I felt intimidated and coerced to donate to the Clerk's campaign fund in order to keep my job. In addition, after refusing to donate, I felt I was working in a hostile working environment and knew it would be a matter of time before I lost my job. When it became clear that I would not conform to the request, I was summoned on Friday, January 3, 2014, at 3:00 pm to the Clerk's Office of which I was informed that I was being relieved of my duties. Though my termination was not effective until Wednesday, January 15, 2014, I was immediately escorted from the premises.

[End of Conversation]

#2

During the same time period (September/October 2013), I conferred with my immediate supervisor

regarding my previous telephone conversation with . I inquired if he had received a call from in regards to making a political donation to the Clerk's campaign fund. He indicated that he had not received such a call. Moreover, he further expressed that he was not intending to make such a donation.

[End of Conversation]

#3

Also, during the same time period, my immediate supervisor , another appointee of the Clerk's Office and I were conversing after work in the Washington Street garage; my immediate supervisor confronted the appointee about why he/she made a political donation of \$500 to the Clerk's campaign fund. Surprised he knew, the appointee indicated that he/she had made a donation of not \$500 but \$300. Furthermore, my immediate supervisor inquired of the appointee if someone from Clerk's office had solicited him/her for the donation. The appointee replied in the affirmative (yes). The appointee clearly felt pressured to donate.

During the conversation, it was discussed that multiple employees may have made political donations in fear of retaliation. A list of employees from the General Sessions Court Clerk's Office is available upon request of the Clerk.

Respectfully, while I am trying to right the wrongs against me, I believe any employee placed in a similar position should be made whole. It is also my belief that any names of those affected should be obtained by investigators via employee interviews as they been done in the past when these/similar allegations were made against other General Sessions Court Clerk(s).

[End of Conversation]

Complainant's Concerns

The Complainant is seeking a fair and accurate outcome to this ethic complaint process up to and including full reinstatement as an Administrator of the General Sessions Court Clerk's Office. Additionally, the Complainant is seeking that all employees similarly situated be made whole. The Complainant is concerned that there are persons acquainted with and/or related to the alleged violator, General Sessions Court Clerk, Edward L. Stanton, Jr., causing concerns at the filing of this complaint. They are as follows:

Damon Griffin

Attorney Griffin presently serves as Ethic Officer for Shelby County Government. Attorney Griffin is a fellow, ordained minister in the same religious demonation (Church of God in Christ, Inc.) as the General Sessions Court Clerk.

Edward L. Stanton III

Attorney Stanton presently serves as the U. S. Attorney for Western Tennessee. Attorney Stanton is the son of the General Sessions Court Clerk.

It is imperative that neither individual aforementioned in the previous paragraph engage in any action or behavior which could be interpreted as retaliatory toward any witnesses who cooperate in this ethic complaint process or disrupt any prospective investigative processes.