

IN THE CHANCERY COURT FOR CAMPBELL COUNTY, TENNESSEE  
AT JACKSBORO

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JIMMY TRAMMELL,

Plaintiff

v.

CAMPBELL COUNTY GOVERNMENT,  
AND CAMPBELL COUNTY  
BOARD OF EDUCATION,

Defendant

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)  
)

CIVIL ACTION NO. \_\_\_\_\_

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COMPLAINT

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Comes now, the Plaintiff, Jimmy Trammell, and would show unto the Court the following:

1. The Plaintiff is and at all times mentioned herein was a citizen and resident of Campbell County, Tennessee.
2. The Defendant, Campbell County Government a/k/a Campbell County, (hereinafter “Campbell County”), is and at all times mentioned herein was a governmental entity. Process with regard to the Defendant, Campbell County, may be served on its managing agent and Mayor, Jack Lynch, 570 Main Street, Jacksboro, Tennessee 37757, pursuant to Rule 4 of the *Tennessee Rules of Civil Procedure*.

The Defendant, Campbell County Board of Education, (hereinafter “Board of Education”), is and at all times mentioned herein was a governmental entity in charge of educational affairs of Campbell County, Tennessee. Process with regard to the Defendant, Campbell County Board of Education, may be served on its managing agent and Director of Schools, Jennifer Fields, at 172 Valley Street, Jacksboro, Tennessee 37757.

3. This cause of action is brought pursuant to Tenn. Code Ann. 10-7-501, *et seq.*<sup>1</sup> Pursuant to Tenn. Code Ann. §10-7-501(b), this Honorable Court has subject-matter jurisdiction over this proceeding. Moreover, venue is proper inasmuch as the Plaintiff is a citizen and resident of Campbell County, Tennessee, and the records sought herein are from Campbell County and Campbell County Board of Education.

4. The Plaintiff would show unto the Court that the Plaintiff submitted two (2) Public Records Requests pursuant to Tennessee Public Records Act (TPRA). One said Request was sent to Campbell County Government on December 1, 2022, and one said Request was sent to Campbell County Board of Education on December 1, 2022.<sup>2</sup>

5. That the Request sent to Campbell County Government as set forth herein has not been complied with and no information or communication has been forthcoming. The Plaintiff would show unto the Court that more than thirty (30) days have now elapsed since the Request has been made for which there is no response, and accordingly, it can reasonably be discerned that Campbell County has failed and refused to provide said information, which the Plaintiff would submit is subject to disclosure, pursuant to the Requests as set forth herein.

6. The Plaintiff would show unto the Court that in response to the Request sent to Campbell County Board of Education, the Plaintiff received electronic correspondence from the Director of Schools, Jennifer Fields, dated December 16, 2022,<sup>3</sup> indicating that the Request needs to be sent to the attorney for the Board of Education.

7. The Plaintiff responded to said electronic correspondence by correspondence dated December 20, 2022, contesting the propriety of the Request set forth in Jennifer Field's email of

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<sup>1</sup> Public Records.

<sup>2</sup> Copies of said Requests are attached hereto and are incorporated by reference herein.

<sup>3</sup> Attached hereto and incorporated by reference herein.

December 6, 2022, but nonetheless, forwarded the Request to attorney for the Board of Education, Dail Cantrell.

8. On January 3, 2023, the Plaintiff received correspondence from Dail Cantrell,<sup>4</sup> wherein the information set forth in the Request was still not forthcoming.

9. The Plaintiff would show unto the Court that as of the date of the filing of this action, the Plaintiff has neither received this information from Campbell County nor has the Plaintiff received this information from the Board of Education.

10. The Plaintiff would show unto the Court that the Campbell County School System has been out of compliance with the State of Tennessee's requirement as it pertains to the health insurance offerings for Board of Education employees. The Plaintiff would show unto the Court that the State of Tennessee required that all school employees, both certified and non-certified, be offered the same health insurance, state-sponsored plan. Contrary to the requirement of the State of Tennessee, Campbell County Board of Education and Campbell County Government failed to comply for several years resulting in significant damages to the employees, not only monetary, but also medical benefits. Hence, the Plaintiff would show unto the Court that there is compelling need for prompt release of the information sought pursuant to said Requests.

11. The information sought in the Requests as set forth herein would be essential inasmuch as the Plaintiff was an employee of the Campbell County Board of Education and Campbell County Government for several years until the termination of his employment on or about April 16, 2020.

WHEREFORE, for the foregoing reasons, the Plaintiff demands:

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<sup>4</sup> Attached hereto and incorporated by reference herein.

1. That proper process issue and be served upon the Defendants, and that the Defendants be required to answer this Complaint within the time required by law, but not under oath, its oath being waived.
2. That pursuant to Tenn. Code Ann. §10-7-505(c), the Defendants have failed to meet their burden of proof for justification of nondisclosure of the records sought by the Plaintiff.
3. That pursuant to Tenn. Code Ann. §10-7-505(d), the Court make a written Finding of Fact and Conclusion of Law and exercise its power of full injunctive remedies.
4. That pursuant to Tenn. Code Ann. §10-7-505(g), the Court finds that the Defendants have willfully failed and refused to make disclosures, and accordingly, assess all reasonable costs, including, but not limited to, attorney fees, against the Defendants for failure to disclose the information sought by the Plaintiff as set forth herein.
5. That pursuant to Tenn. Code Ann. §50-7-505, that the Court enter a judgment in favor of the Plaintiff and order that the records sought by the Plaintiff be made available by the Defendants.
6. The Plaintiff would further request such further and general relief to which he may be entitled to under the law and evidence.

RESPECTFULLY SUBMITTED, this 11<sup>th</sup> day of January, 2023.

JIMMY TRAMMELL

*Jimmy Trammell* (his attorney)  
*By*

BY:

Ameesh A. Kherani, BPR #030218  
Kherani | Dunaway, RLLC  
Attorney for Plaintiff  
112 Cumberland Lane  
Jacksboro, Tennessee 37757  
Telephone: 865-777-0786  
Facsimile: 865-622-8887  
Email: AKherani@KheraniLaw.com

We acknowledge ourselves as surety for all costs, taxes and damages in this case in accordance with T.C.A. §20-12-120.

JIMMY TRAMMELL

*Jimmy Trammell*  
*B* *(his attorney)*

Principal  
P.O. Box 53  
Jellico, Tennessee 37762

Surety  
Kherani | Dunaway  
Attorney for Plaintiff  
112 Cumberland Lane  
Jacksboro, Tennessee 37757  
Telephone: 865-777-0786  
Facsimile: 865-622-8887  
Email: AKherani@KheraniLaw.com

ATTORNEYS  
AMEESH A. KHERANI, ESQUIRE

Of Counsel  
DAVID H. DUNAWAY, ESQUIRE

PHONE  
CLINTON/NORRIS: 865-777-0786  
JACKSBORO: 423-562-7085  
FACSIMILE: 865-622-8887



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OFFICES  
2685 ANDERSONVILLE HWY, STE 2  
CLINTON, TENNESSEE 37716

116 CUMBERLAND LANE, STE 3  
JACKSBORO, TENNESSEE 37757

PLEASE RESPOND TO:  
CLINTON/NORRIS OFFICE

December 1, 2022

*Via Hand Delivery*

Mayor Jack Lynch  
Campbell County Government  
590 Main Street  
P.O. Box 435  
Jacksboro, TN 37757

Re: Tennessee Public Records Act Request

Dear Mayor Lynch:

Enclosed please find a Public Records Request which we are making in relation to and regarding the subject matter outlined in the enclosed.

I would request that you please let us know as soon as said documents are available and I will have my office retrieve same.

If there are any charges associated with obtaining said documents, please advise us of same as well.

Thank you for your attention and cooperation in this regard.

Sincerely yours,

  
Ameesh A. Kherani, Esquire

AAK/nmb

Enclosure

cc: Jimmy Trammell (Via Email: jimmy37762@gmail.com)

## PUBLIC RECORDS REQUEST FORM

The Tennessee Public Records Act (TPRA) grants Tennessee citizens the right to access open public records that exist at the time of the request. The TPRA does not require records custodians to compile information or create or recreate records that do not exist.

(Governmental Entity Name and Name and Contact Information for the Public Records Request Coordinator)

To: **Cambell County c/o Jack Lynch, Mavor, 590 Main St., Jacksboro, TN**


(Insert Requestor's Name and Contact Information (include an address for any TPRA required written response))

From: **Jimmy Trammell, c/o Ameesh A. Kherani, Kherani | Dunaway, PLLC, 11**

Is the requestor a Tennessee citizen?  Yes  No

Request:  Inspection (The TPRA does not permit fees or require a written request for inspection only<sup>1</sup>)

Copy/Duplicate

If costs for copies are assessed, the requestor has a right to receive an estimate. Do you wish to waive your right to an estimate and agree to pay copying and duplication costs in an amount not to exceed \$ 1,000.00 ? If so, initial here: 

Delivery preference:  On-Site Pick-Up  
 Electronic

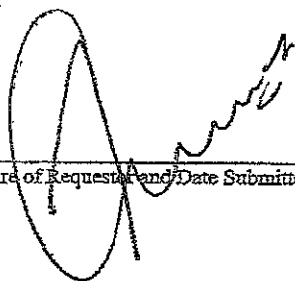
USPS First-Class Mail  
 Other: \_\_\_\_\_

### Records Requested:

Provide a detailed description of the record(s) requested, including: (1) type of record; (2) timeframe or dates for the records sought; and (3) subject matter or key words related to the records. Under the TPRA, record requests must be sufficiently detailed to enable a governmental entity to identify the specific records sought. As such, your record request must provide enough detail to enable the records custodian responding to the request to identify the specific records you are seeking.

See attached.

Signature of Requestor and Date Submitted

 12/1/2022

Signature of Public Records Request Coordinator and Date Received

Print Form

Reset Form

<sup>1</sup>Note, Tenn. Code Ann. § 10-7-504(a)(2)(B)(C) permits charging for redaction of private records of a utility.

**PUBLIC RECORDS REQUEST FORM  
(CONTINUED)**

**TO:** Campbell County Government c/o Jack Lynch, Mayor  
**FROM:** Jimmy Trammell c/o Ameesh A. Kherani, Kherani | Dunaway, PLLC

**Records Requested:**

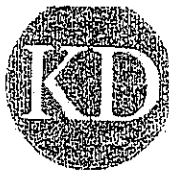
1. Any and all documents from the State of Tennessee requiring the Campbell Co. Board of Education and/or Campbell County to place both certified and non-certified employees on the state-sponsored plan.
2. Any and all documents pertaining to the efforts made by Campbell Co. Board of Education and/or Campbell County to place both certified and non-certified employees on the state local education plan.
3. Memoranda of Understanding signed by the State of Tennessee and Campbell County Board of Education and/or Campbell County regarding placing their employees on the state plan in 2010.
4. Memoranda of Understanding signed by the State of Tennessee and Campbell County Board of Education and/or Campbell County regarding placing their employees on the state plan in 2015.
5. Memoranda of Understanding signed by the State of Tennessee and Campbell County Board of Education and/or Campbell County regarding placing their employees on the state plan in 2017.
6. Memoranda of Understanding signed by the State of Tennessee and Campbell County Board of Education and/or Campbell County regarding placing their employees on the state plan in 2019.
7. Any and all Board meeting minutes from 2010 through present regarding discussions about putting both certified and non-certified employees of the Campbell County Board of Education on the state-sponsored health plan rather than the County health insurance plan.
8. Details regarding the Campbell County health plan.
9. Details regarding state-sponsored health plans.
10. Minutes of the Campbell County Board of Education meetings from 2010 through present regarding discussions pertaining to certified and non-certified employees being placed on different health plans.



AMEESH A. KHERANI, ESQUIRE

Of Counsel  
DAVID H. DUNAWAY, ESQUIRE

PHONE  
CLINTON/NORRIS: 865-777-0786  
JACKSBORO: 423-562-7085  
FACSIMILE: 865-622-8887



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OFFICES  
2685 ANDERSONVILLE HWY, STE 2  
CLINTON, TENNESSEE 37716

116 CUMBERLAND LANE, STE 3  
JACKSBORO, TENNESSEE 37757

PLEASE RESPOND TO:  
CLINTON/NORRIS OFFICE

December 1, 2022

*Via Hand Delivery*

Campbell County Board of Education  
c/o Jennifer Fields, Director of Schools  
27 Valley Street  
Jacksboro, TN 37757

Re: Tennessee Public Records Act Request

Dear Ms. Fields:

Enclosed please find a Public Records Request which we are making in relation to and regarding the subject matter outlined in the enclosed.

I would request that you please let us know as soon as said documents are available and I will have my office retrieve same.

If there are any charges associated with obtaining said documents, please advise us of same as well.

Thank you for your attention and cooperation in this regard.

Sincerely yours,

  
Ameesh A. Kherani, Esquire

AAK/mmb

Enclosure

cc: Jimmy Trammell (Via Email: jimmy37762@gmail.com)

# PUBLIC RECORDS REQUEST FORM

The Tennessee Public Records Act (TPRA) grants Tennessee citizens the right to access open public records that exist at the time of the request. The TPRA does not require records custodians to compile information or create or recreate records that do not exist.

*(Governmental Entity Name and Name and Contact Information for the Public Records Request Coordinator)*

To: Cambell County Board of Education c/o Jennifer Fields, 127 Valley Street


*(Insert Requestor's Name and Contact Information (include an address for any TPRA required written response))*

From: Jimmy Trammell, c/o Ameesh A. Kherani, Kherani | Dunaway, PLLC, 111

Is the requestor a Tennessee citizen?  Yes  No

Request:  Inspection (The TPRA does not permit fees or require a written request for inspection only<sup>1</sup>)

Copy/Duplicate

If costs for copies are assessed, the requestor has a right to receive an estimate. Do you wish to waive your right to an estimate and agree to pay copying and duplication costs in an amount not to exceed \$ 1,000.00? If so, initial here: 

Delivery preference:  On-Site Pick-Up  
 Electronic

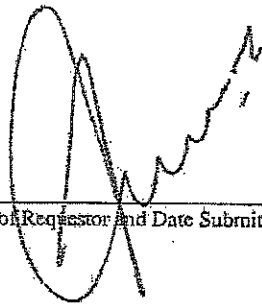
USPS First-Class Mail  
 Other: \_\_\_\_\_

## Records Requested:

Provide a detailed description of the record(s) requested, including: (1) type of record; (2) timeframe or dates for the records sought; and (3) subject matter or key words related to the records. Under the TPRA, record requests must be sufficiently detailed to enable a governmental entity to identify the specific records sought. As such, your record request must provide enough detail to enable the records custodian responding to the request to identify the specific records you are seeking.

See attached.

Signature of Requestor and Date Submitted

  
12/1/2022

Signature of Public Records Request Coordinator and Date Received

Print Form

Reset Form

<sup>1</sup>Note, Tenn. Code Ann. § 10-7-504(a)(20)(C) permits charging for redaction of private records of a utility.

**PUBLIC RECORDS REQUEST FORM  
(CONTINUED)**

**TO:** Campbell County Board of Education c/o Jennifer Fields

**FROM:** Jimmy Trammell c/o Ameesh A. Kherani, Kherani | Dunaway, PLLC

**Records Requested:**

1. Any and all documents from the State of Tennessee requiring the Campbell Co. Board of Education and/or Campbell County to place both certified and non-certified employees on the state-sponsored plan.
2. Any and all documents pertaining to the efforts made by Campbell Co. Board of Education and/or Campbell County to place both certified and non-certified employees on the state local education plan.
3. Memoranda of Understanding signed by the State of Tennessee and Campbell County Board of Education and/or Campbell County regarding placing their employees on the state plan in 2010.
4. Memoranda of Understanding signed by the State of Tennessee and Campbell County Board of Education and/or Campbell County regarding placing their employees on the state plan in 2015.
5. Memoranda of Understanding signed by the State of Tennessee and Campbell County Board of Education and/or Campbell County regarding placing their employees on the state plan in 2017.
6. Memoranda of Understanding signed by the State of Tennessee and Campbell County Board of Education and/or Campbell County regarding placing their employees on the state plan in 2019.
7. Any and all Board meeting minutes from 2010 through present regarding discussions about putting both certified and non-certified employees of the Campbell County Board of Education on the state-sponsored health plan rather than the County health insurance plan.
8. Details regarding the Campbell County health plan.
9. Details regarding state-sponsored health plans.
10. Minutes of the Campbell County Board of Education meetings from 2010 through present regarding discussions pertaining to certified and non-certified employees being placed on different health plans.

From: Jennifer Fields <[jennifer.fields@ccpstn.net](mailto:jennifer.fields@ccpstn.net)>

Sent: Friday, December 16, 2022 10:53 AM

To: Ameesh Kherani <[Akherani@kheranilaw.com](mailto:Akherani@kheranilaw.com)>; Dail R. Cantrell ([dcantrell@cantrell-law.com](mailto:dcantrell@cantrell-law.com)) <[dcantrell@cantrell-law.com](mailto:dcantrell@cantrell-law.com)>

Subject: Public Records Request

Dear Mr. Kherani,

At the advisement of the School Board's attorney, Dail Cantrell, I am writing to request that the Public Records Request you have made be directed to Mr. Cantrell.

In addition, I would like to inform you that the Campbell County Department of Finance may have the information you are seeking on file, as they handle employee benefits for the county. Additionally, the board meeting minutes are public and can be found on the Campbell County Schools website at [www.campbell.k12.tn.us](http://www.campbell.k12.tn.us).

Mr. Cantrell can assist with the details in obtaining the necessary information.

Sincerely,

Jennifer Fields



Jennifer Fields | Director of Schools

Campbell County Schools

172 Valley Street

Jacksboro, TN 37757

423-562-8377

[jennifer.fields@ccpstn.net](mailto:jennifer.fields@ccpstn.net)

The information contained in this message is confidential and is intended solely for the use of the person or entity named above. This message may contain individual identifiable information that must remain confidential and is protected by state and federal law. If the reader of this message is not the intended recipient, the reader is hereby notified that any dissemination, distribution or reproduction of this message is strictly prohibited. If you have received this message in error, please immediately notify the sender by telephone and destroy the original message. I regret any inconvenience and appreciate your cooperation.

Dail R. Cantrell\*  
Krysta Brown Trouy\*  
W. Lucas Arnold  
R. Emily Horton



Physical Address:  
362 S. Charles G. Seivers Blvd.  
Clinton, Tennessee 37716

Mailing Address:  
Post Office Box 299  
Clinton, Tennessee 37717

Daniel R. Goodge, Of Counsel\*  
Rachel Watson, Of Counsel  
\*Rule 31 Mediator

Carla Taylor, Office Manager

cantrell-law.com  
dcantrell@cantrell-law.com

865-457-9100 (p)  
865-463-7881 (f)

January 3, 2023

Ameesh A. Kherani  
2685 Andersonville Highway, Suite 2  
Clinton, TN 37716

Arthur E. Knight, III  
800 South Gay Street, Suite 600  
Knoxville, TN 37929

Jennifer Fields  
c/o Campbell County Board of Education  
172 Valley Street  
Jacksboro, TN 37757

**RE: Tennessee Public Records Act Request  
Jimmy Trammell**

Dear Ameesh, Art, and Jennifer:

Please find enclosed a letter that I received from Ameesh. Art, I believe you are handling this case on behalf of the Trust and as such, should this request be directed to you or me?

In closing, Art, please let me know if this is something that I need to handle, or if it will be handled by your office.

Sincerely,

THE CANTRELL LAW FIRM

Dail R. Cantrell

  
DRC:cjt

Enclosure

AMEESH A. KHERANI, ESQUIRE

Of Counsel  
DAVID H. DUNAWAY, ESQUIRE

PHONE  
CLINTON/NORRIS: 865-777-0786  
JACKSBORO: 423-562-7085  
FACSIMILE: 865-622-8887



# KHERANI | DUNAWAY

ATTORNEYS AT LAW

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OFFICES  
2685 ANDERSONVILLE HWY, STE 2  
CLINTON, TENNESSEE 37716

116 CUMBERLAND LANE, STE 3  
JACKSBORO, TENNESSEE 37757

PLEASE RESPOND TO:  
CLINTON/NORRIS OFFICE

December 20, 2022

*Via First Class Mail*  
*Via Facsimile: 865-463-7881*  
*Via Email: dcantrell@cantrell-law.com*

Dail Cantrell, Esquire  
Cantrell Law Firm  
362 S. Charles G. Servers Boulevard  
Clinton, TN 37716

Re: Tennessee Public Records Act Request

Dear Dail:

Enclosed please find a Tennessee Public Records Act Request which was made to the Campbell County Board of Education, Attention Jennifer Fields, Director of Schools, on December 1, 2022. I was anticipating receiving the information sought in this request in a timely manner until I received electronic correspondence from Ms. Fields on Friday, December 16, 2022, requesting that the request be sent to your attention. I'm not certain why Ms. Fields and the Campbell County Board of Education simply could not provide you with my request for this information rather than to have me send this information to you which seems to be redundant and dilatory.

In any event, enclosed please find the Tennessee Public Records Act Request which was propounded on the Board of Education, which I am sending to you for your review and response as soon as possible.

Please let me know when we can anticipate receiving the responses and the information sought as soon as possible.

If you have any further questions or would like to discuss this matter further, please do not hesitate to contact me.

Sincerely yours,

  
Ameesh A. Kherani, Esquire

Enclosure

cc: Jimmy Trammell (Via Email: jimmy37762@gmail.com)  
Jennifer Fields (Via Email: Jennifer.fields@ccpstn.net)

**PUBLIC RECORDS REQUEST FORM**

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Governmental Body Name and Name and Contact Information for the Public Records Request Coordinator:  
**To: Campbell County Board of Education c/o Jennifer Fields, 127 Valley St**  
Requestor's Name and Contact Information (include an address for any TPRA requests written responses):  
**From: JimmV Trammell, c/o Ameesh A. Kherani, Kherani | Dunaway, PLLC, 111**

Is the requestor a Tennessee citizen?  Yes  No.

Request:  Inspection (The TPRA does not permit fees or require a written request for inspection only.)  
 Copy/Duplicate

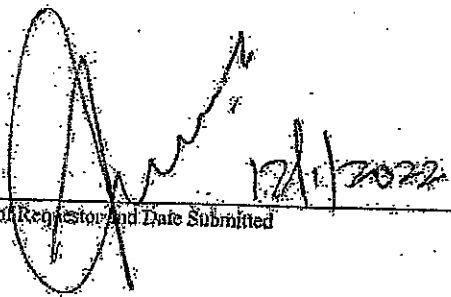
If costs for copies are assessed, the requestor has a right to receive an estimate. Do you wish to waive your right to an estimate and agree to pay copying and duplication costs in an amount not to exceed \$ 1,000.00? If so, initial here:     

Delivery preference:  On-Site Pick-Up  USPS First-Class Mail  
 Electronic  Other

**Records Requested:**

Provide a detailed description of the record(s) requested, including: (1) type of record; (2) timeframe or dates for the records sought; and (3) subject matter or key words related to the records. Under the TPRA, record requests must be sufficiently detailed to enable a governmental entity to identify the specific records sought. As such, your record request must provide enough detail to enable the records custodian responding to the request to identify the specific records you are seeking.

See attached.

  
\_\_\_\_\_  
Signature of Requestor and Date Submitted

\_\_\_\_\_  
Signature of Public Records Request Coordinator and Date Received

Print Form

Reset Form

<sup>1</sup>Note, Tenn. Code Ann. § 10-7-504(a)(2)(C) permits charging for redaction of private records of a utility.

**PUBLIC RECORDS REQUEST FORM  
(CONTINUED)**

**TO:** Campbell County Board of Education c/o Jennifer Fields  
**FROM:** Jimmy Trammell c/o Ameesh A. Kherani, Kherani | Dunaway, PLLC

**Records Requested:**

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