

October 28, 2025

Samantha A. Burnett,
City Attorney
2425 N. Mt. Juliet Road
Mt. Juliet, TN 37122

RE: Ethics Complaint

Dear Mrs. Burnett,

Thank you for brining to my attention the ethics complaint filed against myself and for the opportunity to be heard against this allegation. It is my belief that the alleged violations were not committed and it will be found that I have and always will act under the highest ethics. Below is a statement of facts:

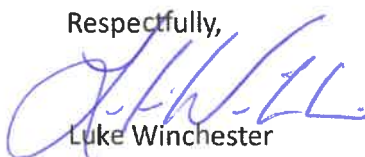
1. I am a minority partner in Mitchell Winchester Asset Management, LLC (known as MWAM) which is a real estate holding company established in the State of Tennessee
2. MWAM purchased 9911 Central Pike on July 27, 2023 with the intent to develop within the jurisdiction of Wilson County Codes
3. Due to a recent ordinance passed within the City of Mt. Juliet, it was required of MWAM that we make application to the City for sewer access. In order to process the application and remain in compliance, we also had to submit a Plat of said subdivision
4. We received a negative recommendation for out-of-city sewer service from the City of Mt. Juliet Staff and BOC due to no access to sewer via this property
5. Upon submitting for preliminary plat and final plat, we received approval from The City of Mt. Juliet meeting all requirements set forth by the subdivision regulations
6. MWAM submitted to Wilson County Planning and Zoning its application for Wright Branch subdivision where it was approved and a letter sent back to the City of Mt. Juliet
7. My only personal communication with City of Mt. Juliet staff was to better understand the process of the new out-of-city sewer ordinance which required all of the said submittals
8. MWAM is unfortunately defending itself in a current lawsuit from Christopher and Lee Ann Williams-Maley. We are under current litigation so I do not wish to make comment on that at this time but to only say we have filed an order of relief under Judge CK Smith's court and cannot be heard until March of 2026. At which time, we believe, the motion of relief will be accepted
9. At no time, did I speak to other members of the Mt. Juliet Planning Commission about MWAM's submittal or attempt to influence any votes
10. At no time, did I make any attempt to speak to or attempt to influence the City of Mt. Juliets staff. Our intent was always to develop within Wilson County Planning and Zoning and not The City of Mt. Juliet
11. MWAM's project came before The Mt. Juliet Planning commission three times. First was on 9/21/23 to request out of city sewer service. I removed myself from the table and

turned the meeting over to the Vice Chair. During this meeting, I did speak as a representative to the project and requested denial. Second was on 10/19/23 where the request was for Preliminary Plat. Due to the absence of the Vice Chair at this meeting, I remained in leadership of the meeting in an attempt to not conduct the election of a Vice Chair to further conduct the meeting. This item, along with others, was on the consent agenda. Other than tabling the consent agenda and asking for a vote on these items, I did not speak about any item on the consent agenda. Furthermore, I abstained. Third was on 10/17/24 where the request was for Final Plat. Again, this was on consent agenda. I did table the consent agenda and I did request a vote. I did not make any comments about any items on the consent agenda and I abstained from the vote.

12. During the three public meetings conducted above, there were no citizen comments and that includes any comments from The Malley's expressing concerns about the submittal.
13. I have served as a member of the Mt. Juliet Planning Commission since 2005 and under the service of now three different Mayors. I have abstained from votes well over 50 times during my tenure. I have never explained my abstention at any one of these times. It was not until these allegations were made that it was explained to me that I should have said "why" I abstained from these votes. I felt that by not making comments and by abstaining from voting that this would suffice as and not be in violation of any ordinances or laws.
14. The attorney for MWAM, Kathleen Robson Gordon, did send an email to the plaintiffs council where she stated the financial burden that is present on this development and that if it should be held up, MWAM could proceed with a re-submittal back to The City of Mt. Juliet where we would apply for sewer, annexation, plan of service and additional density in an attempt to recoup financial losses caused by the lawsuit. In no way was this a threat but simply stating that it would be an available option and one most likely that would be sought after due to the above circumstances

In summary, I respectfully request relief from the allegations of conflict of interest, official misconduct and extortion as none of this occurred. I have lived in the City of Mt. Juliet since 1982. I have worked in the City of Mt. Juliet since 1998. I have served the City of Mt. Juliet as a member of its Planning Commission since 2005. I have served on countless community boards and non-profit organizations within the City of Mt. Juliet and Wilson County during this time. My reputation and continued requests to be involved speak for themselves. At no time have I been anything other than ethical, honest and forthcoming in all that I do. I take pride in all that I do and carry myself as such. I am proud to call myself from Mt. Juliet and proud of what I have been able to do in the community to make it a better place to live. Again, at no time would I have committed such violations especially when we were not even seeking to develop and build within The City of Mt. Juliet. Thank you for hearing me out and thank you for allowing my voice to be heard.

Respectfully,



Luke Winchester