

Christopher Maley & Lee Ann Williams-Maley

9991 Central Pike
Mt. Juliet, TN 37122

September 16, 2025

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

Dear Ms. Burnett:

This letter serves as a formal follow-up to the deficiencies outlined in your email of September 10, 2025, concerning our complaint dated August 28, 2025.

We have taken the following steps to address the noted items:

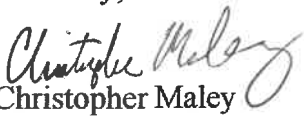
- Our original statement and this complaint have both been **duly notarized**.
- Our current address has been included on this letter and has been handwritten on the initial complaint for clarity.
- We affirm that the facts presented in our August 28 submission are based on our thorough research, a review of official documents and emails from the planning department, and the official video recording of the Mt. Juliet Planning Committee meeting on October 17, 2024.
- We have provided copies of three key documents as attachments:
 - The email from attorney Kathleen Robson Gordon to our attorney Ben Lewis, dated July 30, 2025
 - Court documents for Case CV-2025-77, including the temporary restraining order
 - The Plat, Deeds, and Deed Restrictions pertaining to Lot 5 of the Roy D. Rader Estates

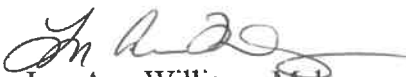
Additionally, a typographical error on the original complaint has been corrected and initialed. The date of Ms. Gordon's correspondence, previously listed as July 20, 2025, now accurately reflects July 30, 2025.

We understand that the City of Mt. Juliet will provide the Ethics Committee with access to the ordinances cited in our original complaintⁱ and the agendaⁱⁱ and videoⁱⁱⁱ from the October 17, 2024 Planning Committee Meeting.

We appreciate your consideration of this matter. Please do not hesitate to contact us should you or the committee require any further information.

Sincerely,

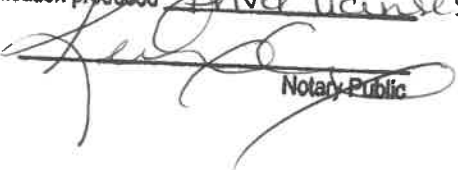

Christopher Maley

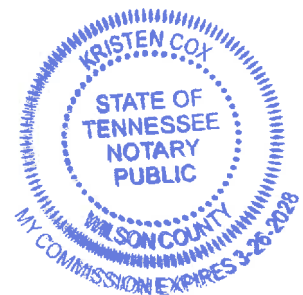

Lee Ann Williams-Maley

ⁱ https://library.municode.com/tn/mt._juliet/codes/land_development_code?nodeId=PTASURE_ARTIGEPR

ⁱⁱ <https://mtjuliet-tn.legistar.com/MeetingDetail.aspx?ID=1135310&GUID=19FB9B2E-14D7-4F35-B945-2D6FC9464ED8&Options=info%7C&Search=>

ⁱⁱⁱ https://mtjuliet-tn.granicus.com/player/clip/111?view_id=1&redirect=true

State of Tennessee
County of Wilson
Subscribed and sworn to (or affirmed) before me this
10th day of September 2025
By Christopher Maley + Lee Ann Williams-Maley
Personally known OR produced identification x
Type of identification produced Driver licenses

Notary Public



To: Yancy Belcher, Mt. Juliet Ethics Commission Chairman
CC: Kenny Martin, Mt. Juliet City Manager
James Manness, Mt. Juliet Mayor
Samantha Burnett, Mt. Juliet City Attorney
Subject: Ethics Complaint and Allegation of Official Misconduct Against Luke Winchester, Planning Commission Chairman
Date: August 28, 2025

This complaint is filed to allege multiple violations of public ethics and statutory law by Luke Winchester in his capacity as Chairman of the Mt. Juliet Planning Commission. The violations stem from a direct and undisclosed conflict of interest related to a property he owns through Mitchell-Winchester Asset Management LLC and subsequent actions that appear to constitute official misconduct and coercion.

1. Factual Summary and Allegations of Misconduct:

- Luke Winchester through his ownership interest in Mitchell-Winchester Asset Management, LLC is the owner of properties located at 9911 Central Pike and the adjacent Lot 5 of the Roy D. Rader Estate in Wilson County.
- On July 20, 2025, Mitchell-Winchester Asset Management LLC's attorney Kathleen Robson Gordon by email threatened us, adjacent property owners, stating that if we did not release a legal injunction on the development, the Defendants would seek to have the number of units on the property increased from 7 to 60. After reviewing the City of Mt. Juliet's Land Use Map, we cannot find that this claim is easily achieved, but it is still a threat by his legal representative and he is an appointed city official.
- While serving as Planning Commission Chairman, Luke Winchester presided over and participated in a meeting on October 17, 2024, where a vote was taken to approve the development of a 7-home subdivision on property he owns through his ownership interest in Mitchell-Winchester Asset Management, LLC.
- During this meeting, Mr. Winchester failed to publicly disclose his ownership interest in the property being voted upon, thereby concealing a clear conflict of interest. While we were aware that Mr. Winchester abstained from voting on the matter, *we were not aware until watching the Committee's video on August 20, 2025*, that he did not publicly disclose his ownership interests or recuse himself.
- The City of Mt. Juliet's Ordinances, 1-105.201 and 1-105.202,¹ are very clear when it comes to matters of items of deed restrictions. We wonder if this subdivision would have been approved if Mr. Winchester was not the Planning Commission Chairman?
- On April 14, 2025, our attorney Ben Lewis filed a lawsuit in Wilson County's Chancery Court. A temporary restraining order to stop the development was issued by Chancellor Smith on the same day. On April 29, 2025, we were in court for a hearing on our case. Chancellor Smith left the Injunction in place.

¹ 1-105.201. *Public provisions.* These regulations are not intended to interfere with, abrogate, or annul any other ordinance, rule, or regulation, statute, or other provision of law. Where any provision of these regulations imposes restrictions different from those imposed by any other ordinance, rule, regulation, or other provision of law, whichever provisions are more restrictive or impose higher standards shall control, as determined by the enforcing officer.
1-105.202. *Private provisions.* These regulations are not intended to abrogate any easement, covenant, or other private agreement or restriction; provided, that where these regulations are more restrictive or impose higher standards than such easement, covenant, or other private agreement or restriction, the requirements of these regulations shall govern. Where any private provision exceeds the standards set forth herein, such shall be considered a private contract between the parties of interest, and, as such, is beyond the jurisdiction of the Planning Commission.

State of Tennessee
County of Wilson

Maleys' Ethics Complaint

Subscribed and sworn to (or affirmed) before me this
14th day of September 2025
By Christopher Maley & Lee Ann Williams-Maley
Personally known _____ OR produced identification
Type of identification produced Driver Licenses

- A contempt order will be forthcoming.

2. Violations of Law and Public Trust:

The actions of Luke Winchester constitute a direct violation of several ethical principles and statutes governing public officials in Tennessee:

- **Conflict of Interest:** By failing to disclose his ownership interest and by participating in a meeting concerning his own property, the Chairman violated his duty to act impartially and in the public interest. This creates a clear and unmitigated conflict of interest.
- **Official Misconduct:** The Chairman's alleged threat through his attorney to use his public office to harm us as adjacent property owners for personal gain constitutes an abuse of power. This action directly supports an allegation of **Official Misconduct** under T.C.A. § 39-16-402, as he is alleged to have used his official position to obtain a benefit or restrict the freedom of action of another person.
- **Extortion:** The specific threat to increase the density of a project to force the adjacent property owner to release a legal injunction directly aligns with the elements of **Extortion** under T.C.A. § 39-14-112, which prohibits using coercion to unlawfully restrict a person's freedom of action.

3. Supporting Information:

- This matter is currently the subject of a legal case, where subpoenas have been issued to the City Planning Department.
- On June 6, 2025, our attorney filed a subpoena to request "All emails, text messages, instant messages, and any other forms of electronic communication (including but not limited to messages sent via internal communication platforms, Slack, Microsoft Teams, etc.) related to the application, review, discussion, and approval of the subdivision known as MWAM Subdivision located at 9911 Central Pike and Lot S, Roy D. Rader Estate, Mt. Juliet, Tennessee 37122."
- The Department has allegedly engaged in deliberate acts of obstruction, including refusing to accept service from a process server in June 2025 and delaying the acceptance of certified mail related to this case until July 2025. This pattern of behavior is relevant as it appears to be an attempt to impede the legal process and protect the Chairman from investigation.
- Initially, the City of Mt. Juliet's Planning Department requested an extension on producing the requested documents. Our attorney's office contacted them to agree on a deadline and did not hear back. To date, the City of Mt. Juliet has failed to provide any of the information requested by our Legal Counsel through the Subpoena.

4. Request for Action:

I respectfully request that the Mt. Juliet Ethics Commission conduct a full investigation into these allegations of misconduct. The Chairman's actions are a serious breach of public trust and, if proven, warrant formal censure, removal from office, and potential referral for criminal prosecution. Corroborating evidence and documentation is available upon request. Please confirm receipt of this complaint. We can be reached at 615-773-4024.

Sincerely,


Lee Ann Williams-Maley


Christopher Maley

