

**IN THE CHANCERY COURT FOR SUMNER COUNTY, TENNESSEE AT GALLATIN**

WINSTON TEMPLET, )  
Plaintiff, )  
 )  
v. ) No.  
 )  
BOARD OF COMMISSIONERS OF THE )  
CITY OF MILLERSVILLE, )  
 )  
 )  
and )  
 )  
TOMMY LONG, )  
MILTON DORRIS, and )  
ALISA HULING )  
Personally and Individually, )  
Defendants. )

---

**COMPLAINT**

---

Comes now Plaintiff, Winston Templet, a citizen of the State of Tennessee and of the City of Millersville, Tennessee and brings this action against the City of Millersville Board of Commissioners in its official capacity and Tommy Long, Milton Dorris, and Alisa Huling in their individual capacities, pursuant to the Open Meetings Act, T.C.A. § 8-44-101, et seq. for their open, notorious, and flagrant violations of the Tennessee Open Meetings Act. In support of this cause of action, the Plaintiffs would state and show as follows:

**BACKGROUND**

1. The City of Millersville is chartered pursuant to T.C.A. 6-18-101, et seq. as a City Manager-Commission form of city government. The Commission consists of five members. The persons holding the role of “Mayor” and “Vice Mayor” are selected from the five commissioners, and by

charter, have no active role in the executive branch of city government other than the power to hire and fire a city manager.

2. After the last regular election in November 2022, the five members of the Commission chose from among their number Defendant Tommy Long to serve in the role of “mayor.”

3. Defendant Tommy Long either doesn’t understand or doesn’t care that the City of Millersville has a “weak-mayor” form of government. Inasmuch as Tommy Long has, in recent months, failed, refused, or been otherwise able to explain certain actions that he has taken under color of authority and how they are in the best interest of the City, one can only surmise that Tommy Long’s motivations are personal to himself and not the City. Specifically, in recent months, Tommy Long has used his official position in ways that exceed his actual statutory authority and refrained from taking certain actions that are required of his office. It seems clear that these actions were done with the intent to harm his political opponents.

4. The City Manager, Scott Avery, was hired as city manager by the previous Board of Commissioners in September 2022. Scott Avery came from out of town and inherited a city government plagued with issues from previous mismanagement and lack of consistent leadership. Mr. Avery was well qualified as a public administrator and provided firm leadership. He was doing a good job.

5. Despite this, upon becoming “mayor” after the November 2022 election, Tommy Long made it very clear that he intended to get rid of Scott Avery and install a city manager of his choosing.

6. Per the City’s charter, the city manager serves at the will of the commission, except that during a city manager’s first twelve months of employment, he or she cannot be terminated except for cause.

7. The City of Millersville had no cause to terminate Scott Avery; therefore, Tommy Long was unable to achieve his goal, despite his attempts to bully Mr. Avery into quitting.

8. The abrupt departure of Commissioner Keith Bell in June, 2023, left a vacancy on the Commission. Per the charter, the sitting commissioners were to appoint someone to fill the vacancy for the unexpired term. Tommy Long controls Milton Dorris; therefore, he needed someone to provide him his coveted third vote to control a majority of the five-member commission.

9. It was no secret in Millersville that Tommy Long sought a pledge from the applicants to join him in firing Scott Avery. Because of this, the four commissioners could not agree to fill the vacancy and the issue was forced into a special election, which cost the city approximately \$90,000 and, in which, only 400 citizens cast a vote.

10. In the special election, Tommy Long actively supported Alisa Huling. The special election was held on December 19, 2023, and Ms. Huling won 284 of 400 votes cast, a pitifully low voter turnout.

#### OPEN MEETING ACT VIOLATIONS

1. The first regular commission meeting after the election was scheduled for Tuesday, January 23, 2024.

2. At 4:38 p.m. on Thursday, January 18, 2024, after Mr. Avery had put together the agenda for the Tuesday night meeting, Tommy Long sent him an email directing him to add to the agenda a consideration for the termination of the city manager and the appointment of an interim city manager. Mr. Avery added it to the agenda.

3. Ms. Huling was sworn in at the beginning of the meeting at 6:00 p.m. on January 23<sup>rd</sup> and then took her seat at the council dais.

4. When agenda item number 14 came up, 20 minutes after Ms. Huling was sworn in, Mayor Tommy Long read the agenda item and, without discussion, asked for a motion to terminate Scott Avery. Milton Dorris made the motion immediately, without hesitation and without discussion. Alisa Huling, right on cue, seconded the motion. After several minutes of fiery objection from Commissioners Gregory and Templet, the motion carried in a 3-2 vote with Defendants Long, Dorris, and Huling voting to fire Scott Avery without any explanation being given. Despite public outcry from the spectators, the three commissioners refused to give an explanation to the public, their constituents.

5. Tommy Long then announced that he had received a resume from a woman (never mind that there was no job opening until moments before and no job posting) and that he thought she was well qualified. Alisa Huling admitted that she knew the woman. No one else had ever heard of her. Without discussion, Mayor Tommy Long asked for a motion to hire her. Without discussion or delay, Alisa Huling made the motion and Milton Dorris seconded the motion. Without discussion, the motion carried in a 3-2 vote.

6. The record on video speaks for itself, of course, and a link to it is provided here:

<https://www.cityofmillersville.com/topic/index.php?topicid=74&structureid=13>

7. There was no discussion in the meeting concerning what Ms. Tina Tobin, the new interim city manager, was to be paid. However, Tommy Long acknowledged after the meeting adjourned to a bystander that they had “agreed” to pay her \$6500/month.

8. It is impossible for any reasonable person to believe that Mr. Long, Mr. Dorris, and Ms. Huling did not have outside deliberations and agreements to fire Scott Avery, to hire Tina Tobin, and to pay Tina Tobin \$6,500/month. There is an obvious violation of the Tennessee Open Meetings Act.

9. If Ms. Huling and Mr. Dorris were to assert that they had no such prior discussions with Mr. Long, then they would be admitting to taking these actions with literally no thought whatsoever—an utter dereliction of any duty that they may have to make thoughtful, informed decisions for their constituents.

Premises considered, Plaintiff prays:

1. For the Court to find that Defendants are in violation of the Tennessee Open Meetings Act.
2. That, pursuant to T.C.A. 8-44-105, all actions taken in violation of this act are void ab initio, including all actions taken by Ms. Tobin acting as interim city manager, specifically the firing of Police Chief Rob Richman on January 26, who had been hired approximately one month before after an extensive nationwide search and vetting process, in which the public participated.
3. For a permanent injunction to enter against Defendants Long, Dorris, and Huling, pursuant to T.C.A. 8-44-106.
4. For attorney fees.
5. For any further or general relief which the justice of this cause may require.

Respectfully submitted,

Electronically submitted  
J. B. FREEDLE #022089  
Attorney for Plaintiff  
103 Main Street  
Portland, TN 37148  
[jack@gallatinlawyers.com](mailto:jack@gallatinlawyers.com)  
(615) 325-2508


STATE OF TENNESSEE  
COUNTY OF SUMNER

WINSTON TEMPLET, being first duly sworn, makes oath and states that matters set forth in the foregoing Complaint and that the statements contained therein are true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
WINSTON TEMPLET

Sworn to and subscribed before me this the 30 day of January, 2024.



  
\_\_\_\_\_  
NOTARY PUBLIC  
My commission expires: