

**IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

DR. MARIE FEAGINS

Plaintiff,

Case No. _____

v.

SHELBY COUNTY
BOARD OF
EDUCATION,

and

AMBER HUETT-GARCIA,
JOYCE DORSE-COLEMAN,
MICHELLE MCKISSACK,
NATALIE MCKINNEY,
TOWANNA MURPHY,
KEITH WILLIAMS,
STEPHANIE LOVE,
TAMARQUES PORTER and
SABLE OTEY

Defendants.

**COMPLAINT FOR VIOLATIONS OF THE TENNESSEE OPEN MEETINGS
ACT**

COMES NOW the Plaintiff, Dr. Marie Feagins, by and through the undersigned counsel, and submits this Complaint against the Shelby County Board of Education, which does business under the name Memphis-Shelby County Schools ("MSCS"), and its members, in their official capacities, Amber Huett-Garcia, Joyce Dorse-Coleman, Michelle McKissack, Natalie McKinney, Towanna Murphy, Keith Williams, Stephanie Love, Tamarques Porter and Sable Otey (collectively, the "School Board") for violation of the Tennessee Open Meetings Act, Tenn.

Code §§ 8-44-101 to 8-44-201 *et seq.* (the “Act”), and states as follows:

PARTIES, JURISDICTION, AND VENUE

1. Dr. Feagins is a resident of Memphis, Shelby County, Tennessee.
2. Defendant MSCS is a local education agency pursuant to Tenn. Code Ann. § 49-1-103 located and operating in Memphis, Shelby County, Tennessee, with a principal place of business at the mailing address of 160 South Hollywood Street, Memphis, Tennessee 38112. Defendant MSCS may be served process through its attorney of record, Mr. Justin Bailey.
3. Upon information and belief, the individual School Board members are, and were at all times relevant to this action, residents of Memphis, Shelby County, Tennessee. The School Board members may be served with service of process through MSCS counsel, Mr. Robert Spence, Esq.
4. This Court has jurisdiction over the subject matter of this action under Tennessee Code Annotated §§ 16-10-10 and 8-44-104, which grants this Court judicial review of violations of the Act.
5. Venue is proper before this Court under Tennessee Code Annotated § 20-4-101 *et seq.*, because this action arises in Shelby County, Tennessee.

FACTUAL BACKGROUND

6. After a nearly eighteen month national search by the then school board of MSCS, on or about February 9, 2024, Dr. Feagins was unanimously selected to lead MSCS as its superintendent.
7. Before even her first day in office, Dr. Feagins spent much of her time learning the school system and building strong, lasting relationships with community leaders in Shelby County, school staff, local groups and organizations, community partners and School Board

members.

8. On April 1, 2024, Dr. Feagins formally assumed the role as superintendent, keenly focused on elevating the excellence of MSCS, its students, families and staff. Dr. Feagins devoted her first days in office to visiting schools and community groups to understand the needs and concerns.

9. Within her first 100 days as superintendent, Dr. Feagins successfully forged more than 75 additional MSCS partnerships, greatly expanding the network, support and resources for MSCS students, rehired over 255 former MSCS teachers, increased student enrollment and attendance, decreased overtime waste by nearly \$1 million dollars, decreased teacher vacancies and student involved fights, among many, many more measurable gains.

10. As a result of her data-informed approach, proven results and genuine engagement with teachers, students, and staff, Dr. Feagins received overwhelming approval ratings from the more than 10,000 teachers, partners, community members, and students surveyed about her performance.

A. **Dr. Feagins files Petition for Order of Protection against Charles “Dow” McVean, Jr., prompting JB Smiley, Jr., to warn Dr. Feagins that she would pay for her actions.**

11. Over the span of nearly five years, MSCS has spent to the tune of \$13 million with Peer Power Foundation (“Peer Power”), a nonprofit tutoring and mentoring organization, founded by the late Charles McVean, Sr., and co-chaired by his son, Charles “Dow” McVean, Jr.

12. When Dr. Feagins assumed the role of superintendent, MSCS and Peer Power had an existing contract valued at over \$4 million.

13. While unknown by Dr. Feagins at the time, the Peer Power contract was set to expire by its terms in June 2024 with no renewal options available under the contract, and

MSCS General Counsel, Justin Bailey, had advised MSCS administration that, pursuant to MSCS procurement policy, the school must open the mentoring and tutoring services provided by Peer Power up to a request for proposal (RFP) to allow other vendors to submit proposals for these services.

14. On August 8, 2024, while leaving a Greater Memphis Chamber Chairman's Circle luncheon, McVean, who Dr. Feagins had never met, cornered her in the hallway as she exited the luncheon. McVean immediately began demanding that Dr. Feagins provide him with information regarding the expired contract with Peer Power. When Dr. Feagins responded that she would connect with her team to determine the status of the contract, McVean became increasingly angry and agitated, exclaiming "your team?" McVean then demanded that Dr. Feagins provide him the name of a specific person on her team that he could contact.

15. After providing McVean with a contact person to inquire about the Peer Power contract, Dr. Feagins quickly exited the area. As Dr. Feagins walked through the parking lot to her vehicle, McVean approached her again, this time pointing his finger and yelling "if you don't want to do business with Peer Power then just say so!" McVean raised his hands and began yelling "I am angry! ... this is some bulls***! ... I am f***ing frustrated!" McVean then began advancing towards Dr. Feagins shouting "I worked my f***ing a** off, wasted my money trying.... I'm f***ing frustrated!" prompting a former school board member and Dr. Feagins' then special assistant, Camalyn Turner to step in to shield Dr. Feagins. Finally, McVean shouted "f*** you and f*** off and stomped away.

16. Dr. Feagins reported McVean's intimidating, threatening and harassing encounter to the Memphis Police Department and filed a Petition for Order of Protection in the General Sessions Court of Shelby County. *See* Petition for Order of Protection (August 9, 2024) attached

hereto as Exhibit A.

17. On August 9, 2024, the same day that Dr. Feagins petitioned the court for an order of protection against McVean, Dr. Feagins received a phone call from an angry JB Smiley, Jr., Chairman of Memphis City Council. During the phone call, Smiley shouted at Dr. Feagins “Don’t you ever file a f***ing police report in this city again without telling me first... You don’t know these people... My funders are on me now telling me she has to go because they know I supported you ... they are telling me to get rid of you.”

18. Smiley conveyed a similar message several weeks later to Ladia Yates, owner of Y.L.E. Academy. Specifically, Smiley told Yates “we are coming after [Feagins]” because of the police report filed against McVean. Smiley went on to tell Yates that “[Feagins] will be gone... just watch.”

19. The School Board soon showed considerable interest in Peer Power. On September 12, 2024, School Board member Towanna Murphy contacted Dr. Feagins regarding the expired contract with Peer Power. Murphy emphasized to Dr. Feagins that “Peer Power is huge in this city,” and demanded that she “fix the relationship with Peer Power,” noting that doing so “will gain [Dr. Feagins] brownie points.” See T. Murphy text message (September 12, 2024), attached hereto as Exhibit B.

B. School Board members begin to repeatedly meet in secret to consult and develop a consensus on firing Dr. Feagins in private in violation of the Act.

20. Upon information and belief, on or about August 28, 2024, three School Board members, Dorse-Coleman, Love and then School Board Chair Althea Greene, met in private at a Memphis restaurant to discuss terminating Dr. Feagins. During this meeting, Dorse-Coleman, Love and Greene discussed their positions on the termination and the potential votes of other School Board members in favor of the same.

21. Following this meeting, Dorse-Coleman informed Dr. Feagins that Greene stated that they “have the votes” to “get rid of you.”

22. Upon information and belief, School Board members met, discussed and drafted a proposed resolution outlining more than fourteen allegations against Dr. Feagins and calling for her immediate suspension, but not termination. This proposed resolution was circulated via text messages to multiple School Board members on October 16, 2024, two months before a resolution for termination was brought before the public and School Board. *See* draft resolution attached hereto as Exhibit C.

23. Upon information and belief, in November 2024, School Board members, Murphy, Dorse-Coleman, Otey, McKinney and Love met together at The Carter Malone Group with Roderick Richmond to discuss their proposed plan to terminate Dr. Feagins’ employment agreement and replace her with Richmond.

24. Upon information and belief, in early December, prior to notice of the public meeting on terminating Dr. Feagins, School Board members Dorse-Coleman and McKinney met in secret with Richmond to discuss him replacing Dr. Feagins as superintendent. Following the School Board’s private assurances to Richmond that he would replace Dr. Feagins as superintendent, Richmond began making phone calls to form his team. For example, upon information and belief, Richmond contacted Kristy Sullivan in November 2024, a month before any public notice for consideration to terminate Dr. Feagins, to inquire about her interest in joining MSCS under his anticipated leadership of the school district.

25. Upon information and belief, on or about December 14, 2024, School Board members McKinney, Otey, Porter, and Murphy attended former MSCS Superintendent Mr. Joris Ray’s birthday gathering and discussed allegations against Dr. Feagins and their position related

to terminating Dr. Feagins.

26. Upon information and belief, on or about December 1, 2024, during the Whitehaven tree lighting ceremony, Murphy informed several attendees that the School Board “had the votes” to terminate Dr. Feagins.

C. **After Defendants’ secret plotting, deliberating and building consensus behind closed doors, Defendants implemented their agreed plan to terminate Dr. Feagins’ contract without adequate public notice in a sham meeting in direct violation of the Act.**

27. Despite the resounding approval of Dr. Feagins, growing momentum for the school district and unrefuted positive results, on December 16, 2024, in blatant disregard for the notice period required by Tennessee law, the School Board issued notice of a special meeting on December 17, 2024 (less than 24 hours) to discuss the termination of Dr. Feagins’ employment.

28. Before the defective notice of the special meeting on December 17, 2024 was even published, based on confidential information received from sources close to the School Board, local radio and social media personality, Thaddeus Matthews, shared on Facebook exactly how the School Board planned to vote: 5 votes in favor of terminating Dr. Feagins. Even more, Matthews, and other members of the public, knew exactly who the 5 members in favor of the resolution would ultimately be: Dorse-Coleman, McKinney, Otey, Murphy, and Love.

29. During the December 17, 2024 special meeting, School Board Chair, Dorse-Coleman, presented a resolution to terminate Dr. Feagins, citing three allegations: acceptance of a donation without School Board approval, misrepresentation regarding a missed deadline to allocate grant funding, and misrepresentation regarding employee abuse of overtime.

30. During the special meeting, Dr. Feagins requested that the School Board permit her time to submit a written response to the allegations before voting on the resolution to terminate her employment. In a narrow 5 - 4 vote, the Board granted Dr. Feagins’ request, with

Dorse-Coleman parting with School Board members Otey, Love, Murphy and McKinney to allow Feagins until January 14, 2025 to submit a written response and postpone the vote on the resolution until January 21, 2025.

31. Only the five School Board members who initially favored terminating Dr. Feagins were aware that the December 17, 2024 special meeting would be called and had knowledge of the specific content of the resolution to terminate: Dorse-Coleman, Otey, Love, Murphy and McKinney.

32. During a December 18, 2024 interview with a local reporter, Murphy confirmed that she and certain other School Board members received a phone call and an email from School Board Chair Dorse-Coleman on Sunday, December 15, 2024 to discuss the proposed resolution and special meeting. Upon information and belief, the School Board Chair selectively discussed the resolution by phone with the other 4 School Board members that she knew shared her consensus regarding the termination of Dr. Feagins, a matter that the School Board knew was public and should only be deliberated in a public meeting.

33. Upon information and belief, on or about December 27, 2024, following the postponement of the vote on the resolution to terminate Dr. Feagins, McKinney met with Sarah Carpenter, Executive Director of Memphis Lift, and informed Carpenter that the School Board members met in private multiple times about Dr. Feagins' termination, reasons for her terminations and voting consensus.

34. On or about January 4, 2025, School Board members Porter and Otey attended a birthday gathering. Upon information and belief, Otey stated to multiple people at the birthday party that the School Board still had the votes necessary to terminate Dr. Feagins, demonstrating that School Board members continued to discuss and deliberate Dr. Feagins' termination.

35. Prior to the vote on January 21, 2025, Murphy intentionally spread false, malicious, defamatory texts to the entire School Board accusing Dr. Feagins of being involved in the theft of her vehicle in an obvious effort to improperly influence the School Board's decision on terminating Dr. Feagins. Murphy continued spreading this blatant lie broadly, calling the Mayor of the City of Memphis, Paul Young, to lie to him about the same. See T. Murphy text message, attached hereto as Exhibit D.

D. After months of repeated secret meetings, planning, substantive discussions and vote counting, the School Board votes to terminate Dr. Feagins

36. Prior to the start of the January 21, 2025 meeting, the School Board held a closed executive session to receive a copy of a report from Robert Spence detailing alleged facts that form the basis for Dr. Feagins' termination. Upon information and belief, Spence shared certain alleged material facts from the report with only select School Board members prior to the executive session and then finally shared certain alleged facts from the report with the full School Board during the executive session January 21, 2025. After receiving the alleged "facts" from Spence, upon information and belief, School Board member Williams stated, "If these are the facts, what more is there to talk about." Williams then signaled his intentions to vote in favor of terminating Dr. Feagins based on the information provided by Spence.

37. Upon information and belief on or about January 21, 2025, School Board members Otey, Love, McKinney, and Murphy met and deliberated in the restroom at MSCS' central office before the board meeting to discuss and tabulate the votes in preparation for the meeting.

38. During the Board meeting on January 21, 2025, numerous Board Members are publicly seen texting throughout the meeting. Upon information and belief, texts were sent between Board members regarding their votes, positions, and intentions on the pending

resolution to terminate Dr. Feagins.

39. Upon information and belief, Board Member Otey was being instructed on how to vote during the public meeting, as evidenced by her constant reading of text messages throughout the meeting, including as she voted, and changing her vote multiple times.

40. During the Board Meeting on January, 21, 2025, the School Board voted to terminate Dr. Feagins' employment agreement with a 6 to 3 vote. The six members that voted to terminate Dr. Feagins' employment agreement were Board Members Murphy, Dorse-Coleman, Otey, McKinney, Love and Williams.

COUNT I

VIOLATION OF TENNESSEE OPEN MEETINGS ACT

41. Plaintiff incorporates by reference the allegations set forth in paragraphs 1–40 above.

42. The School Board is a “governing body” within the meaning of Tenn. Code Ann. § 8-44-102(b)(1)(A).

43. The School Board special meeting did not provide the required adequate public notice for a meeting to allow public participation and is a direct violation of the Act, which requires governing bodies to provide adequate public notice of their meetings. Tenn. Code Ann. § 8-44-103; *Englewood Citizens v. Englewood*, No. 03A01-9803-CH-00098, (Tenn. Ct. App. 1999).

44. The School Board voted to terminate Dr. Feagins after violating the Act on multiple occasions, each constituting a separate violation, as described herein from August 2024 through January 21, 2025. Tenn. Code Ann. § 8-44-101 *et seq.*

45. The Defendants' held numerous meetings in person and through electronic

communications in secret to plan and deliberate on a public matter, in violation of Tenn. Code Ann. § 8-44-101(a).

46. Such meetings of two or more Board members that discussed, decided and deliberated public business including, but not limited to, the termination of Dr. Feagins' employment agreement outside of a publicly-noticed and publicly-held meeting constitute violations of Tenn. Code Ann. § 8-44-102(a).

47. Such electronic communication as described herein was made in violation of Tenn. Code Ann. § 8-44-102(c), which provides that "[n]o . . . informal assemblages, or electronic communications shall be used to decide or deliberate public business in circumvention of the spirit or requirements of this part." Tenn. Code Ann. § 8-44-102(c).

48. School Board members texting each other during a public meeting about deliberations, discussions, positions and voting is a direct violation of the Act. Tenn. Code Ann. § 8-44-102(c).

49. Two School Board members, Dorse-Coleman and Love, met on or about August 28, 2024 and substantively discussed and deliberated their positions on the termination of Dr. Feagins' employment agreement, constituting a violation of the Act.

50. In October 2024, certain School Board members met, discussed and drafted a proposed resolution outlining their deliberations related to the immediate suspension of Dr. Feagins months before the public meeting on December 17, 2024, in violation of the Act.

51. The meeting between five School Board Members, Murphy, Dorse-Coleman, Otey, McKinney and Love, at The Carter Malone Group office, constituted a quorum of the Board and a Board meeting, to discuss and build consensus and a plan for Dr. Feagins'

termination and replacement in secret without prior public notice or the public present is in direct violation of the Act.

52. In early December 2024, School Board members Dorse-Coleman and McKinney met together, communicated with each other via text communication and communicated with Roderick Richmond to discuss Dr. Feagins' contract termination, and discussed and built consensus on such action amongst themselves and with other School Board members regarding replacing Dr. Feagins with Richmond, in direct violation of the Act.

53. School Board members McKinney, Otey, and Murphy met at Joris Ray's birthday gathering and discussed among themselves and in the presence of others, details related to the termination of Dr. Feagins and their intentions with regard to votes related to the same, in violation of the Act.

54. School Board members McKinney, Otey, Murphy, Porter, Dorse-Coleman and Love, communicated, conducted substantial deliberations and discussions, built consensus via electronic communications and in meetings in private to discuss a proposed resolution to terminate Dr. Feagins' employment agreement in violation of the Act.

55. The January 14, 2025 meeting between School Board members McKinney and Dorse-Coleman met, texted, discussed and deliberated throughout the day and even texted during the meeting about Dr. Feagins' termination in direct violation of the Act.

56. On or about January 21, 2025, Board Members Otey, Love, McKinney, and Murphy met and deliberated in the restroom at MSCS' central office before the board meeting to substantively discuss and build consensus for votes in preparation for the meeting. Such deliberate and secret activity is a violation of the Act.

57. Certain School Board members deliberated by discussing their position and votes

during the executive sessions on January 21, 2025, in violation of the Act.

58. School Board member Williams specifically discussing his vote and position in the executive session with other Board Members outside of a publicly attended meeting is a direct violation of the Act.

59. School Board members texting and communicating via text message during the Board meeting on January 21, 2025 regarding their votes, positions, deliberations and advising other Board members on how to specifically vote on the proposed Resolution is a direct violation of the Act.

60. School Board Member Otey texting and reading from her phone and being advised how to vote by other Board Members during a public meeting is a direct violation of the Act.

61. Due to the Defendants' violations of the Act, all actions taken by the Defendant School Board in violation of the Act are void *ab initio*.

62. Due to Defendants' violations of the Act, the Court should enter a permanent injunction enjoining Defendants from any future violations of the Act, retain jurisdiction over the Defendant parties and subject matter for a period of one year from the date of entry of its final judgment and order

Defendants to report in writing semi-annually to the Circuit Court in compliance with the Act.

63. No adequate remedy exists at law to protect the rights of Dr. Feagins and other members of the public other than as requested herein.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Honorable Court:

A. Pursuant to Tenn. Code § 8-44-106(b), file written findings of fact and

conclusions of law holding that the Defendants' actions constitute a violation of the Act, and order that such findings of fact and conclusions of law shall be presented to the Board and recorded in the minutes of a publicly noticed regular meeting of the Defendant School Board;

B. The actions of the Defendants in conducting numerous violations of the Act have caused irreparable harm to citizens interested in such meetings, and accordingly, an injunction should issue in due course directing the Defendants to strictly adhere to and abide by the Open Meetings Law in all future proceedings of the Defendant Memphis-Shelby County School Board.

C. Pursuant to Tenn. Code § 8-44-105, the termination vote, termination resolution and any related action taken on January 21, 2025 shall be deemed void *ab initio*;

D. Pursuant to Tenn. Code § 8-44-106(c), enter a permanent injunction enjoining Defendants from any future violations of the Act, including but not limited to the use of texts, email and private meetings to circumvent the Act by deliberating, deciding and voting on public business outside of a properly-noticed meeting in a public forum;

E. Pursuant to Tenn. Code § 8-44-106(d), retain jurisdiction over the Defendant parties and subject matter for a period of one year from the date of entry of its final judgment, and order Defendants to report in writing semi-annually to the Circuit Court on compliance with the Act;

F. Defendants be taxed with the cost of this civil action, including discretionary costs, and attorney fees due to Defendants' willful and intentional violations of the Act pursuant to Tenn. Code Ann. § 8-44-106(e);

G. Plaintiff be allowed to amend her *ad damnum* and amend the pleadings upon the discovery of additional facts through subpoenas, depositions and discovery;

H. Plaintiff be awarded pre-judgment and post-judgment interests on all such amounts granted;

I. Grant Plaintiff an award of her reasonable expenses and costs incurred in this action to the fullest extent allowed under law or statute; and

J. Grant such other relief as the Honorable Court deems just and proper.

Respectfully submitted February 3, 2025,

WOOTEN LAW OFFICE

s/ William A. Wooten
William A. Wooten (BPR #026674)
Wooten Law Office
120 Court Square East
Covington, Tennessee 38019
(901) 475-1050
(901) 234-0028/facsimile
William@wootenlawoffice.com
Counsel for Plaintiff

We acknowledge ourselves as surety for the costs of this cause not to exceed One Thousand Dollars (\$1,000.00).

s/ William A. Wooten
William A. Wooten
Counsel for Plaintiff

EXHIBIT A

**Petition for Order of Protection
and Order for Hearing**

Electronically filed per TCA §16-1-115

In the General Sessions Court of Shelby County, TN

Case# (the clerk fills this in):

24802234

Petitioner's Name: (person needing protection)

(List Child's name if filed on behalf of person under 18 years of age pursuant to TCA §36-3-602.)

Marie

Feagins

first

middle

last

Check if Applicable:

☐ Petitioner is under 18 and this Petition is being filed on behalf of an unemancipated person (someone under 18 years of age) pursuant to TCA §36-3-602. This request is being made by:

who is ☐ child's parent or ☐ legal guardian or ☐ a caseworker.

☐ This request is being made by a law enforcement officer pursuant to TCA §36-3-619.
Person on whose behalf this Petition is filed consents in writing to the filing and signs here:

****PETITIONER'S CHILDREN UNDER 18 THAT PETITIONER BELIEVES ARE IN NEED OF PROTECTION:**

Name	Age	Relationship to Respondent	Name	Age	Relationship to Respondent
1. _____			3. _____		
2. _____			4. _____		

Respondent's Information (person you want to be protected from):

Charles

McVean

first

middle

last

date of birth (MM/DD/YY)

street address

city

TN
state

zip

Respondent's Employer: McVean Trading & Investments
Employer's Name

Employer's phone #

Respondent is in Custody ☐

Respondent resides outside of Shelby County ☐

Describe Respondent:

Sex	Race	Hair	Eyes	Height - Weight - SSN - Other
<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	<input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> Other: _____	<input type="checkbox"/> Black <input type="checkbox"/> Grey <input type="checkbox"/> Blond <input type="checkbox"/> Bald <input type="checkbox"/> Brown <input type="checkbox"/> Other: _____	<input type="checkbox"/> Brown <input type="checkbox"/> Hazel <input type="checkbox"/> Blue <input type="checkbox"/> Green <input type="checkbox"/> Gray <input type="checkbox"/> Other: _____	Height: _____ Weight: _____ Social Sec. # (Provided to Clerk's Office if known): _____ Scars/Special Features: _____ Phone Number: _____

1. Check all of the following that apply to the Petitioner:

- A. ☐ We are married or used to be married.
B. ☐ We live together or used to live together.
C. ☐ We have a child together.
D. ☐ We are dating, used to date, or have had sex.
E. ☐ We are relatives, related by adoption, or are/were in-laws (Specify): _____
F. ☐ We are the children of a person whose relationship is described above (Specify): _____
G. ☒ The Respondent has stalked me
H. ☐ The Respondent has sexually assaulted me.
I. ☐ Other: _____

Warning!

- ☐ Weapon Involved
☐ Has or owns a weapon



ORDER FOR HEARING

The Petitioner and Respondent must go to court and explain to the judge why the judge should or should not issue an Order of Protection against the Respondent.

This hearing will take place on (date): 9/11/2024 at (time): 09:00 AM

at (location): 201 Poplar, 2nd Floor Hearing Room


Judicial Officer's -signature

Date: 8/9/2024

Proof of Service of Petition, Notice of Hearing and Temporary Order of Protection:

Respondent was served on: (date): _____

at (time): _____ ☐ a.m. ☐ p.m. by (check one):

- ☐ Personal Service
- ☐ U.S. Mail per TCA §20-2-215 and §20-2-216
(The Respondent does not live in Tennessee.)

Server's signature _____

Print Name _____

Petitioner was served on: (date): _____

at (time): _____ ☐ a.m. ☐ p.m. by (check one):

- ☐ Personal Service

Server's signature _____

Print Name _____

If the Petitioner is under 18 (and Petitioner is a social worker filing on behalf of a minor) and service of these documents would not put him/her at risk, the Clerk will serve and fill out below. (TCA § 36-3-605(c))

I served the child's parents copies of the Petition, Notice of Hearing, and Temporary Order of Protection by personal delivery or U.S. Mail on: (date): _____

at (address): _____

Clerk's Signature: _____

Notice to the Respondent about Firearms:

If the court grants the Petitioner's request for a Protective Order:

- ☒ You will not be able to have a firearm while this or any later protective order is in effect. You will have to transfer all firearms in your possession within 48 hours to any person who is legally allowed to have them. 18 U.S.C. §922(g)(8), TCA §36-3-606(g), TCA §36-3-625.
- ☒ You will not be allowed to buy a firearm until the court says otherwise.

INFORMATION SHEET AS TO PROTECTIVE ORDER

INCIDENT # 2080924212642

Odyssey CASE# 24802234

PLAINTIFF

Name: Marie Feagins DOB: [REDACTED]
first middle last

Address: [REDACTED] Sex: ☐ Male ☒ Female
Street Address

[REDACTED] [REDACTED] [REDACTED] Race: [REDACTED]
City State Zip

Home Phone #: [REDACTED]

DEFENDANT

Name: Charles McVean DOB: [REDACTED]
first middle last

POSSIBLE RNI #: _____

AKA: Dow Sex: ☒ Male ☐ Female Race: [REDACTED]

Height: [REDACTED] Weight: 250 lbs Eye Color: _____ Hair Color: [REDACTED]

Address: [REDACTED] SSN: _____
Street Address

[REDACTED] [REDACTED] [REDACTED] Age: [REDACTED]
City State Zip

Home Phone #: [REDACTED]

Alternate Address: _____
Street Address

City/State Zip

Work Address: [REDACTED] Phone: _____
Street Address

[REDACTED] [REDACTED] [REDACTED] Work Hours: _____
City/State Zip

Vehicle Make/Model: _____ Year: _____ Color: _____

Tag No. & State: _____

Most Like Time to Make Service: anytime

This hearing will take place on (date): 9/11/2024 at (time): 09:00 AM

at (location): 201 Poplar, 2nd Floor Hearing Room

**Petition for Order of Protection
and Order for Hearing**

Electronically filed per TCA §16-1-115

In the General Sessions Court of Shelby County, TN

Case# (the clerk fills this in):

24802234

Petitioner's Name: (person needing protection)

(List Child's name if filed on behalf of person under 18 years of age pursuant to TCA §36-3-602.)

Marie

Feagins

first

middle

last

Check if Applicable:

☐ Petitioner is under 18 and this Petition is being filed on behalf of an unemancipated person (someone under 18 years of age) pursuant to TCA §36-3-602. This request is being made by:

who is ☐ child's parent or ☐ legal guardian or ☐ a caseworker.

☐ This request is being made by a law enforcement officer pursuant to TCA §36-3-619.
Person on whose behalf this Petition is filed consents in writing to the filing and signs here:

****PETITIONER'S CHILDREN UNDER 18 THAT PETITIONER BELIEVES ARE IN NEED OF PROTECTION:**

Name	Age	Relationship to Respondent	Name	Age	Relationship to Respondent
1. _____	_____	_____	3. _____	_____	_____
2. _____	_____	_____	4. _____	_____	_____

Respondent's Information (person you want to be protected from):

Charles

McVean

first

middle

last

date of birth (MM/DD/YY)

street address

city

state

zip

Respondent's Employer: McVean Trading & Investments
Employer's Name

Employer's phone #

Respondent is in Custody ☐

Respondent resides outside of Shelby County ☐

Describe Respondent:

Sex	Race	Hair	Eyes	Height - Weight - SSN - Other
<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	<input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> Other: _____	<input type="checkbox"/> Black <input type="checkbox"/> Grey <input type="checkbox"/> Blond <input type="checkbox"/> Bald <input type="checkbox"/> Brown <input type="checkbox"/> Other: _____	<input checked="" type="checkbox"/> Brown <input type="checkbox"/> Hazel <input type="checkbox"/> Blue <input type="checkbox"/> Green <input type="checkbox"/> Gray <input type="checkbox"/> Other: _____	Height: _____ Weight: _____ Social Sec. # (Provided to Clerk's Office if known): _____ Scars/Special Features: _____ Phone Number: _____

1. Check all of the following that apply to the Petitioner:

- A. ☐ We are married or used to be married.
- B. ☐ We live together or used to live together.
- C. ☐ We have a child together.
- D. ☐ We are dating, used to date, or have had sex.
- E. ☐ We are relatives, related by adoption, or are/aware in-laws (Specify): _____
- F. ☐ We are the children of a person whose relationship is described above (Specify): _____
- G. ☒ The Respondent has stalked me
- H. ☐ The Respondent has sexually assaulted me.
- I. ☐ Other: _____

Warning!

- ☐ Weapon involved
- ☐ Has or owns a weapon

2. List all children under 18 that you have:

**** ☐ Check here if listing addresses would put you or your child in danger. If so, leave any spaces for addresses blank.**

Name of Child	Age	Is Respondent the parent of the child?	Does the child need to be protected from the Respondent?	Child's Address
		<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	
		<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	
		<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	
		<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	
		<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	
		<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	

3. Where else have the children (that you and Respondent have together) lived during the last 6 months?

Children's previous addresses

Who did they live with at this address?

4. Other Court Cases - Is there any court, other than this court, in which the respondent and petitioner are parties to an action? (including cases in which the parties have children in common).

☐ Yes ☐ No If "Yes", fill out below:

County and State of other case:

Case Number (if you know it):

Kind of Case (check all that apply): ☐ Divorce ☐ Domestic Violence ☐ Criminal ☐ Juvenile ☐ Child Support ☐ Other (specify):

5. Custody Rights - Does anyone besides you or the Respondent claim to have custody or visitation rights to the Children that you and Respondent have together?

☐ Yes ☐ No If "Yes", fill out below:

Name

Address

6. Describe Abuse - (use additional sheets of paper if necessary and attach to Petition)

Describe abuse, stalking or assault (include, IF APPLICABLE, information about abuse or fear of abuse to your child(ren), personal property or animals)

Charles McVean is the stalking suspect of the victim. Victim/Marie Feagins states that on or about 8/8, she experienced unwanted contact from Charles McVean. Victim states she exited a meeting room and Charles McVean approached her, introduced himself and immediately asked her about a contract. Victim states she responded to the question with "oh okay, let me follow-up with my team and see where we are....". Victim states Charles McVean became agitated and stated, "your team?, I think we're waiting on a MOU or something, would they have that?". Victim states Charles McVean went on to ask if there was a specific person he could reach out to and work on an agreement. Victim states she provided Charles McVean with an email. Victim states Charles McVean became increasingly agitated and rude. Victim states her assistant walked up and she exited the area. Victim states she made her way outside to her vehicle and was approached by Charles McVean once again. Victim states Charles McVean pointed his finger at her and two other individuals present and stated, "If you don't want to do business with Peer Power, then just say so!". Victim states Charles McVean raised both of his hands in despair and began yelling "I am angry" and "this is some bullshit". Victim states Charles McVean began advancing towards her and her assistant and board member shielded her. Victim states Charles McVean was yelling "I worked my fucking ass off, wasted my money trying.....I'm fucking frustrated!". Victim states Charles McVean pointed at her while saying "fuck you" and "fuck off" before he stomped away. Victim states Charles McVean continued to display aggression towards her and the police were contacted. Victim states the actions displayed towards her by Charles McVean cause her to feel terrorized, frightened, intimidated, threatened and harassed. Due to the above, the victim would like for

Where and when did this happen?

Shelby County TN

Describe any weapons used:

--

I ask the court to make the following Orders after the hearing: (check all that apply)

7. ☒ **No Contact**
Please order the Respondent to not contact ☒ me or ☐ our children under 18, directly or indirectly, by phone, email, messages, text messages, mail or any other type of communication or contact.
8. ☒ **Stay Away**
Please order the Respondent to stay away from ☒ my home ☒ my workplace or ☒ from coming about me for any purpose.
9. ☒ **Personal Conduct**
Please order the Respondent not to:
☒ Cause intentional damage to my property or interfere with the utilities at my home.
☐ Hurt or threaten to hurt any animals that I/we own or keep.
10. ☐ **Temporary Custody**
Please give me temporary custody of my children.
11. ☐ **Child Support**
Please order the Respondent to pay child support.
12. ☐ **Petitioner Support (if married)**
Please order the Respondent to pay spousal support.
13. ☐ **Move-out / Provide other housing**
Please order the Respondent to (check one): ☐ move out of our family home immediately
or ☐ provide other suitable housing (if married).
☐ Check here if your home or lease is in the Respondent's name only.
☐ If the parties share a residence, please allow the Respondent to obtain his/her clothing and personal effects such as medicine and other things he/she may need.
14. ☐ **Counseling / Substance Abuse Programs**
Please order the Respondent to go to a certified batterers' intervention program if one available in the area or a counseling program.
15. ☒ **No Firearms**
Please order the Respondent not to have, possess, transport, buy, receive, use or in any other way get any firearm.
List all firearms that the Respondent owns, controls, or has access to (type "pistol", "rifle", etc and location):

-
16. ☐ **Animals / Pets**
Please give me custody and control of any animal owned, possessed, leased, kept or held by me, the Respondent, or the children listed above.
17. ☒ **Costs, fees, and litigation taxes**
Please order the Respondent to pay all court costs, lawyer fees, and taxes for this case.
18. ☐ **Transfer the billing responsibility for and rights to wireless telephone number(s)**

Current account holder (name):

Billing telephone number:

New account holder (name):

All telephone numbers to transfer to new account holder: (include area code)

- | | |
|-------------------------|-------------------------|
| 1) <input type="text"/> | 5) <input type="text"/> |
| 2) <input type="text"/> | 6) <input type="text"/> |
| 3) <input type="text"/> | 7) <input type="text"/> |
| 4) <input type="text"/> | 8) <input type="text"/> |

If the judge makes this order, you will be financially responsible for the transferred wireless telephone number or numbers, including the monthly service costs and costs of any mobile device associated with the wireless telephone number or numbers. You may be responsible for other fees. You must contact the wireless service provider to find out what fees you will be responsible for and whether you are eligible for an account.

19. ☐ **Other Orders: (General Relief)**

I also ask the court to:

1. Make an immediate Temporary Order of Protection. (Ex-Parte Order of Protection)
2. Notify law enforcement in this county of that Order.
3. Serve the Respondent a copy of that Order and Notice of Hearing to take place within 15 days of service.
4. Serve a copy of the Request, Notice of Hearing and Temporary Order on the parents of the Petitioner (if the Petitioner is under 18 years of age) unless the Court finds that this would create a serious threat of serious harm to the Petitioner. T.C.A. §36-3-605(c)

Petitioner (or parent/legal guardian/caseworker) signs here in front of notary/clerk/judicial officer and swears that he/she believes the above information to be true:



Date: 8/9/2024

Counselor / Advocate / Public Official fills out this section:

I declare that the Petitioner has read this Petition, and swears it to be true to the best of her/his knowledge.
Sworn and subscribed before me, the undersigned authority,

By: T.Denton

Agency: CVRCC

8/9/2024

On this date (mm/dd/yyyy)

Phone #: (901) 222-3950



Counselor / Advocate / Public Official signs here

☐ The court finds good cause and will issue a Temporary Order of Protection.

☒ The court does not find good cause and denies a Temporary Order of Protection
The court finds there is no immediate and present danger of abuse to the petitioner and denies the Petitioner's request for a Temporary Order of Protection. The court will set the matter for hearing.

Notice to the Respondent about Firearms

If the court grants the Petitioner's request for a Protective Order:

- ☒ You will not be able to have a firearm while this or any later protective order is in effect. You will have to transfer all firearms in your possession within 48 hours to any person who is legally allowed to have them. 18 U.S.C. §922(g)(8), TCA §36-3-606(g), TCA §36-3-625.
- ☒ You will not be allowed to buy a firearm until the court says otherwise.

ORDER FOR HEARING

The Petitioner and Respondent must go to court and explain to the judge why the judge should or should not issue an Order of Protection against the Respondent.

This hearing will take place on (date): 9/11/2024 at (time): 09:00 AM

at (location): 201 Poplar, 2nd Floor Hearing Room



Judicial Officer's -signature

Date: 8/9/2024

Proof of Service of Petition, Notice of Hearing and Temporary Order of Protection:

Respondent was served on: (date): _____

at (time): _____ ☐ a.m. ☐ p.m. by (check one):

☐ Personal Service

☐ U.S. Mail per TCA §20-2-215 and §20-2-216
(The Respondent does not live in Tennessee.)

Server's signature

Print Name

Petitioner was served on: (date): _____

at (time): _____ ☐ a.m. ☐ p.m. by (check one):

☐ Personal Service

Server's signature

Print Name

If the Petitioner is under 18 (and Petitioner is a social worker filing on behalf of a minor) and service of these documents would *not* put him/her at risk, the Clerk will serve and fill out below. (TCA § 36-3-605(c))

I served the child's parents copies of the Petition, Notice of Hearing, and Temporary Order of Protection by personal delivery or U.S. Mail on: (date): _____

at (address): _____

Clerk's Signature: _____

Notice to the Respondent about Firearms:

If the court grants the Petitioner's request for a Protective Order:

- ☒ You will not be able to have a firearm while this or any later protective order is in effect. You will have to transfer all firearms in your possession within 48 hours to any person who is legally allowed to have them. 18 U.S.C. §922(g)(8), TCA §36-3-606(g), TCA §36-3-625.
- ☒ You will not be allowed to buy a firearm until the court says otherwise.

NOTE: YOU MUST APPEAR AT THE HEARING IF THE JUDICIAL COMMISSIONER SIGNS AND GRANTS THE PETITION FOR AN ORDER OF PROTECTION.

AT THE HEARING:

1. The Judicial Commissioner will decide whether or not your order will be granted or extended.
2. Bring all pertinent information (EVIDENCE) regarding your case to the hearing. For example: witnesses, photos, police reports, text messages or recorded messages or any evidence supporting your claim/statement. If you have no documentation/evidence other than your statement, an Order of Protection may not be granted.
3. If you fail to appear, the Judicial Commissioner may DISMISS the petition.

IF AT ANY TIME, YOU FEEL YOU ARE IN IMMEDIATE DANGER, CALL 9-1-1 FOR HELP.

For other services, you may call:

YWCA of Greater Memphis: (901) 725-4277, domestic violence emergency hotline and shelter.

MIFA: (901) 529-4545, connects families with minor children to shelter and other resources.

Catholic Charities: (901) 722-4762, connects individuals and families to shelter and other resources.

Shelby County Crime Victims & Rape Crisis Center: (901) 222-3950, court advocacy.

Kindred Place: (901) 276-2200, counseling services for you and/or your child(ren).

Family Safety Center: (901) 222-4400, follow-up with your assigned navigator.

I certify that I have read, or had this read to me, and understand the foregoing notice.



Date: 8/9/2024

EXHIBIT B

<  **Murphy Personal ...** v ⋮

4:35 PM

Ok.. The relationship with
Peer Power we need to fix.
I will go to the meeting
with you. Peer Power is
huge in this city. You will
gain brownie points.

4:50 PM

Melissa Rice, Enrollment
Advisor
Larkisha Danish Analyst
Enrollment Registration &
Attendance Team for SEED
Cabrida Grady Advisor
Compliance Team for SEED
Leisa Bedell Discipline &
Behavior Team SEED
Amanda Castano
(bilingual) Attendance
Specialist Enrollment
Registration Attendance
Team SEED
Alma Ro

View all



They all have degrees

8:55 PM



EXHIBIT C

Richard

1. Effective immediately, Mane Figgins is hereby suspended from the position of Superintendent of Memphis-Shelby County Schools until further notice, pending an investigation into the matters raised.
2. Mane Figgins shall be relieved of all responsibilities, duties, and authority associated with the position of Superintendent during the period of suspension.
3. The suspension shall remain in effect until the Board of Education confirms the removal of

8. Allegation Received for Violating MSCS Policy 2019: At the superintendent's request, a \$45,635.33 check was cashed from School Sent without proper execution of MSCS Policy 2019. The Superintendent shall be required to provide notification of the intended and actual use of grants, gifts, donations, and sponsorships approved by the Board. As adherence to these policies is critical for maintaining transparency and accountability within the district.

9. Executing Employee Payments for Singing Services without Following Controls and Consideration of Conflict of Interest: Allegation was received that an employee received financial benefit of \$1,700, favoritem and requested to perform at Legacy Night by Superintendent. Every payment made by the district should follow proper approval channels and be backed by documented agreements or contracts, including clear descriptions of services and compensation. The district was in compliance with

14. FMLA Employment Terminations: There are significant concerns regarding the Superintendent's approach to employee terminations, particularly in cases involving staff members on Family and Medical Leave Act (FMLA) leave, including maternity leave and those facing serious health conditions such as cancer. Firing employees while they are on FMLA leave may raise serious ethical and legal implications. The FMLA is designed to protect employees from losing their jobs due to serious health conditions or

Delivered



EXHIBIT D

9:52



9 People

11:20 AM
Respectfully,
Doug

Doug McGowen
President/CEO
MLGW
220 S. Main St.
Memphis, TN 38103



Today 11:20 AM



Thank you

Today 11:20 AM

Thank you for letting us know. Be
safe everyone 🙏



Today 11:20 AM



Thank you

Today 11:20 AM



Thank you, I will be in the house.
Lol

Today 11:20 AM

Today 11:20 AM

These folks came to my house
and stole my car. Now the police
are here, TBI is being alerted. Dr.
Feagins and her crew playing a
dangerous game

