

Ethics and Formal Complaint Concerning Mayor Paige Brown

To Whom It May Concern,

I respectfully submit this formal ethics complaint regarding Mayor Paige Brown's obtaining, use, and external dissemination of municipal surveillance footage for purposes unrelated to legitimate City business, including use in a private lawsuit. Based on publicly available information, sworn statements, and the City Attorney's investigative report dated June 2, 2026, I believe Mayor Brown's conduct constitutes serious violations of the Gallatin Code of Ethics, the Tennessee State Laws and raises concerns under applicable Tennessee state law.

I. Relevant Provisions of the Gallatin Code of Ethics

The following provisions of Division 1 of the Gallatin Code of Ethics appear directly implicated:

- **Section 2-6** – Prohibits officials from disclosing confidential information obtained through their office and from using such information for personal or financial gain.
- **Section 2-7** – Prohibits the use of municipal facilities, equipment, or supplies for private gain or advantage.
- **Section 2-8** – Prohibits using one's official position to secure privileges or exemptions not authorized by law.

Mayor Brown's actions—obtaining surveillance footage outside official channels, releasing it externally, and later using unrelated footage in a sworn affidavit—constitute violations of these provisions.

II. Misuse of Surveillance Footage in a Sworn Affidavit

In her March 4, 2026 declaration, in the Chancery Court Case No.: 25-CV-263 – Jouvence vs. Brown, Mayor Brown asserted:

"In relation to the instant matter, the Plaintiff recorded a younger female City employee... for the deliberate purpose of using her responses to attack me in this lawsuit." "See attached, also, Exhibit C, in which the Plaintiff can be seen entering that same employee's office... and closing the door behind."

However, the video showing me on 09/03/2025 entering an office at City Hall then exiting 33 seconds later that Mayor Brown submitted does not depict or relate to the phone call at issue in the lawsuit, a 3 ½ minutes phone call that happened on 09/25/2025. She included footage that she knew—or reasonably should have known—was irrelevant. This raises concerns about:

- misuse of municipal resources,
- lack of candor in sworn statements,
- and improper leveraging of her official position to obtain and repurpose City property for personal litigation.

III. Second Instance of Improper Access and Release of Surveillance Footage

(Based on the June 2, 2026 Investigative Report)

The City Attorney’s investigative report documents a separate, earlier incident in which Mayor Brown improperly accessed and disseminated City surveillance footage. The report states:

“On or around June 5, 2024, the Mayor requested a copy of the surveillance video from IT, and IT provided it consistent with past internal-use practice.” “The Mayor indicated she forwarded the video to Ms. George...”. Ms. George is Eileen George, former member of the Gallatin City Council.

The report further confirms:

- No public records request was submitted, meaning the release bypassed all required legal review.
- The IT Director “would not release surveillance footage beyond internal operational use absent City Attorney authorization.”
- The City Attorney concluded:

“Regardless of intent, the video should not have been released or posted externally...”

This establishes that Mayor Brown obtained confidential surveillance footage and released it externally without authorization, contrary to City policy and state law.

IV. Aggravating Factor: Selective Release of Confidential Footage

The investigative report confirms that this same surveillance video was previously denied to me when I submitted a formal public records request in August 2023. The City Attorney's Office rejected my request under T.C.A. § 10-7-504(m)(1)(E), stating:

"My office denied that request... treating the surveillance video as a confidential security recording not subject to release..."

Despite this, Mayor Brown later obtained the same video internally and provided it to Ms. George—who then circulated it to another councilmember and ultimately posted a still image derived from it on social media.

Given Mayor Brown was likely aware of the 2023 denial of my public records request—and considering her prior professional experience as a television producer, where familiarity with privacy rules, media handling standards, and the consequences of improper disclosure is customary—it is highly improbable that she did not understand the confidentiality restrictions governing the surveillance footage. Her subsequent decision to obtain the same video internally and provide it to Ms. George outside all authorized channels strongly indicates she acted with knowledge of the prior denial and knowingly circumvented established procedures.

V. Additional Aggravating Factor: The Still-Image Remains Publicly Posted, Demonstrating Continued Inaction

Despite the City Attorney's clear finding that the footage "should not have been released or posted externally," the still-image derived from the surveillance video **remains publicly posted** by Ms. George. Mayor Brown has taken **no corrective action** to request its removal, issue a public clarification, or acknowledge the improper release.

Even after the June 2, 2026 investigative report:

- Mayor Brown did **not** ask Ms. George to remove the post.
- She did **not** notify the public that the release was unauthorized.
- She did **not** apologize to the affected employee or to me.

- She did **not** take any steps to mitigate the reputational harm caused by the unauthorized disclosure.

This continued inaction—despite formal findings that the release was improper—further demonstrates:

- disregard for ethical obligations,
- failure to protect confidential municipal resources,
- and a pattern of selective, harmful disclosure followed by refusal to remedy the consequences.

The fact that the post remains publicly accessible today underscores the seriousness of the misconduct and the absence of corrective leadership.

VI. Applicable Tennessee State Law

Tennessee law provides additional protections for government records:

- **T.C.A. § 39-16-402** – Official misconduct, including misuse of public records or information obtained through one’s office.
- **T.C.A. § 10-7-503 et seq.** – Governs lawful access to public records and requires consistent, non-selective procedures.

Mayor Brown’s actions appear inconsistent with these statutory requirements.

VII. Conclusion and Request for Formal Review

Taken together, these actions—improperly obtaining surveillance footage, releasing it externally without authorization, selectively providing it to a former councilmember while denying it to me, using unrelated footage in a sworn affidavit, and failing to take any corrective action even after the investigative report—establish a clear pattern of conduct inconsistent with the ethical obligations of the Mayor’s office.

This pattern reflects:

- repeated misuse of confidential municipal resources,
- disregard for established legal procedures,
- selective and unauthorized dissemination of protected information,

- refusal to correct known ethical violations,
- and conduct that undermines public trust in the integrity of City leadership.

Given the seriousness of these concerns, I respectfully request that the appropriate ethics officer or investigative authority initiate a formal review pursuant to Section 2-10 of the Gallatin Code of Ethics and related to T.C.A. § 39-16-402 and T.C.A. § 10-7-503 et seq. I also request written confirmation that this complaint has been received and will be reviewed in accordance with established procedures.

Thank you for your attention to this matter.