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## Formal complaint against Paige Brown and the City EDA Executive Director

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**From** Pascal Jouvence <pascal.jouvence@gallatintn.gov>

**Date** Fri 4/10/2026 08:39

**To** Susan High-McAuley (City Attorney) <susan.high-mcauley@gallatintn.gov>; Ben Allen <Ben.Allen@gallatintn.gov>

**Cc** kirk@kirkclementsllaw.com <kirk@kirkclementsllaw.com>;

Susan,

I am submitting this letter to officially document my concerns regarding the conduct of Paige Brown and the EDA Director Rosemary Bates during the March 7, 2026 council meeting and to initiate a formal complaint against both individuals.

After reviewing the official recording of the meeting, it clearly appears that the motion for the referendum had already passed before the Mayor abruptly stopped the roll call. The recording shows that a majority YES votes were cast, and only afterward did Paige Brown intervene in a way that disrupted the process and appeared to influence the outcome. This raises serious questions about whether Paige Brown's actions were lawful and consistent with established procedures.

Additionally, the EDA Director engaged directly with Paige Brown and council members during the vote in a manner that appeared intended to influence the outcome. This interaction occurred while the vote was actively underway. Given her many years of service and extensive familiarity with procedural rules, she is fully aware that such involvement during a vote is prohibited. Her conduct, combined with Paige Brown's interruption, reflects a troubling pattern of interference in the legislative process.

I also want to emphasize that my constituents and others have expressed significant concern about these events. Many of them have reached out to me directly, stating that what they witnessed has shaken their confidence in the fairness and transparency of our local government. Their trust in the process, and in the officials responsible for upholding it, has been deeply affected.

Because of the direct involvement of both the City Council and the City's legal department in the events surrounding this vote, any review conducted internally would present an unavoidable conflict of interest. For this reason, it is essential that the investigation be conducted by an outside and fully independent entity to ensure impartiality, transparency, and public trust.

These actions undermine confidence in the integrity and transparency of our local government. I therefore respectfully request that the city initiate an outside and impartial investigation into the conduct of both Paige Brown and the EDA Director. An independent review is necessary to ensure that any findings are free from internal influence and that the public can trust the outcome.

Please advise on the appropriate steps to begin this process and whether any additional information, documentation, or statements are needed from me.

Thank you for your attention to these serious matters and for your commitment to upholding transparent and accountable governance.

Sincerely,

**Pascal Jouvence**

3rd District Councilman

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