

First Amendment rights. The precise injunctive relief requested is set forth in the Prayer for Relief. Plaintiff also seek damages, attorney's fees, and other relief.

JURISDICTION AND VENUE

1. This cases arises under the First Amendment to the Constitution of the United States and presents a federal question within this court's jurisdiction pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1343(a) (1), (3) and (4). The Court has jurisdiction to award costs and reasonable fees to prevailing Plaintiffs under 42 U.S.C. § 1988.

2. This is an action to remedy and redress deprivations, actual and imminent, under color of law, of individual rights secured to Plaintiffs by 42 U.S.C. § 1983, and the First and Fourteenth Amendments. This is an act for injunctive relief under 28 U.S.C. § 1343 and Rule 65 of the Federal Rules of Civil Procedure.

3. Venue is proper in this district court and judicial district pursuant to 28 U.S.C. § 1391 because it is the district where all defendants reside and all defendants reside in this State and because all or substantial parts of the events or omissions giving rise to this action occurred.

PARTIES

4. Plaintiff AMERICAN ATHEISTS, INC. is a New Jersey nonprofit corporation with its principal office in Cranford, New Jersey. It commonly is known by and uses the name AMERICAN ATHEISTS and is a national nonprofit organization under IRS Code 501(c)(3) (26 U.S.C. § 501 (c)(3)). AMERICAN ATHEISTS defends the First Amendment and acts to keep government from

unconstitutionally favoring religion or religious purposes. AMERICAN ATHEISTS has more than 400 members in Tennessee. Plaintiff AMERICAN ATHEISTS is within the jurisdiction of the United States and this court.

5. Plaintiff JANE DOE has lived in and has resided in Bradley County, Tennessee for more than a decade. She is a citizen of the United States and within this Court's jurisdiction. Plaintiff JANE DOE fears that using her real name in this lawsuit will subject her to ridicule and possible retaliation. Certain exhibits identifying Plaintiff JANE DOE by name are filed under seal.

6. Defendant ERIC WATSON is the Sheriff of BRADLEY COUNTY, TENNESSEE. The Tennessee Constitution, Art. VII, § 1, provides for the election of county officers including Sheriffs.

7. Defendant BRADLEY COUNTY is a county in Tennessee, a governmental entity authorized under Tennessee law that performs governmental functions and duties.

FACTS

8. Defendant Sheriff ERIC WATSON on the public and governmental Facebook page for Bradley County Sheriff's Office ("BCSO") promotes and endorses one religion over others and censors speakers who ask him not to promote or endorse a particular religion or criticize departmental practices or procedures. The Facebook page invites comments from the public and allows their posts to be on the site so that other members of the public can read them.

9. While Defendant Sheriff ERIC WATSON operates the local jail, investigates certain crimes, and performs other duties and functions of a Sheriff, Defendant BRADLEY COUNTY funds a substantial part of the Sheriff Office's operations and approves his budget. The Sheriff is a law enforcement officer with authority to investigate crimes, make arrests and carry out other criminal enforcement authority.

10. Defendant Sheriff ERIC WATSON operates, maintains, created or contributes to a governmental Facebook page, namely <https://www.facebook.com/Bradley-County-Sheriffs-Office-146357125387104/>.

11. This Facebook page contains posts about matters of public interest including about crime in the county, Amber Alerts, neighborhood watches and other matters relating to the Defendant Sheriff ERIC WATSON in his role and duties as Sheriff. Exhibits B, C, G, and Collective Exhibit D to the Complaint.

Exhibit B and Collective Exhibit D to the Complaint are filed as "Collective Attachment C" under seal in the "Motion for Individual Plaintiff to Proceed as Jane Doe, a Pseudonym, and for Her Identity, Name, and the Verification to the Complaint be Sealed and Remain Sealed."

12. In several places on this Facebook page, next to the Sheriff Office's badge, are the words "Bradley County Sheriff's Office." Exhibit A to the Complaint is a true and exact printed page of this website.

13. Exhibit A is a post from the Sheriff's Office Facebook page dated on or about March 27, 2016. In the largest font on that page, the headline reads, "He Is

Risen.” The “He” refers to Jesus. Underneath this headline, the Sheriff wrote or sanctioned the writing that the day is special far beyond “special services” and Easter egg hunts, hitting his main point: “Jesus die[d] on the cross for our sins” and “rose” from the dead and cited verses from the Bible, with a link to the scripture verses.

14. The Defendant Sheriff ERIC WATSON’s message, as set forth in Exhibit A, in pertinent parts, reads as follows:

Today is one of the most historic days, not only did Jesus die on the cross for our sins, but he rose on this day! Luke 24: 2-3 says “And they ...

15. On March 27, 2016, Plaintiff AMERICAN ATHEISTS received a complaint from a Bradley County resident about the Defendant Sheriff ERIC WATSON’s Easter message on the BCSO’s Facebook page.

16. On March 28, 2016, Plaintiff AMERICAN ATHEISTS and its legal center emailed a letter to Defendant Sheriff ERIC WATSON explaining that the “He Is Risen” article evangelized Easter inappropriately on a governmental social media site. Exhibit E.

17. That same letter cited other instances where Defendant Sheriff ERIC WATSON used his position or the BCSO’s Facebook page to evangelize and proselytize the Sheriff’s faith. This letter resulted in a local newspaper article “Atheists Condemn Facebook Postings” on April 2, 2016.

18. On April 3, 2016, the Defendant Sheriff ERIC WATSON posted the newspaper article about Plaintiff AMERICAN ATHEISTS' March 28, 2016 on the BCSO's Facebook Page.

19. On April 4, 2016, Plaintiff AMERICAN ATHEISTS received complaints that comments on the newspaper article post that were "supportive of the atheist point of view and critical of the Sheriff's Office" were being deleted from the BCSO's Facebook page.

20. Plaintiff JANE DOE has two Facebook accounts. She uses one, which is a pseudonym, for games and commenting on social issues, and the second, which uses her real name, to communicate with family and friends.

21. On April 4, 2016, Plaintiff JANE DOE responded to the newspaper article post about the Plaintiff AMERICAN ATHEISTS' March 28, 2016, letter, using her pseudonym Facebook account, writing that while the Defendant Sheriff ERIC WATSON was free to promote his personal religious beliefs on his personal Facebook page he should not do so in his official capacity.

22. Shortly thereafter, Plaintiff JANE DOE's comment urging the Defendant Sheriff ERIC WATSON not to use the BCSO's Facebook page to promote his religion in response to the newspaper article was deleted.

23. On April 5, 2016, Plaintiffs AMERICAN ATHEISTS sent a second letter to Defendant Sheriff ERIC WATSON warning that deleting comments was censorship. Exhibit F.

24. The BCSO's Facebook page clearly invites the public to comment. Exhibit H, for instance, has a section marked "Visitor Posts."

25. At Exhibit D, others who posted on the BCSO's Facebook page claim that their comments were deleted because the comments were critical of the Defendant Sheriff ERIC WATSON, the Sheriff's religion, or his policies.

26. When the Defendant Sheriff ERIC WATSON disagrees with comments of a particular post on the BCSO's Facebook page, he or the staff of the BCSO often deletes the post.

27. On April 5, 2016, Plaintiff JANE DOE, revealing her real name, talked to the Bradley County Mayor's assistant, Lindsay Hathcock, about the BCSO deleting the posts JANE DOE made on the BCSO's Facebook page using her pseudonym account and blocking completely her ability to comment on the BCSO's Facebook page with her pseudonym account. Mr. Hathcock told Plaintiff JANE DOE that he would look into the problem.

28. Later that day, April 5, 2016, the BCSO then blocked Plaintiff JANE DOE's second Facebook account, which uses her real name, from posting on the BCSO's Facebook page despite Plaintiff JANE DOE having never used that account to comment previously on the BCSO's Facebook page.

29. On April 6, 2016, Plaintiff JANE DOE spoke to Arnold Botts, BCSO's director of administration, and informed him that her accounts had been blocked and requested that her access to the BCSO's Facebook page be restored. Within

several hours, Plaintiff JANE DOE's ability to comment on the BCSO's Facebook page was restored to her second Facebook account, the one with her real name.

30. Exhibit B and Collective Exhibit D show that Plaintiff JANE DOE used her real identity to comment on the BCSO's Facebook Page and that on or about April 16, 2016, Plaintiff JANE DOE's comments are being deleted from the Facebook Page.

31. Plaintiff JANE DOE, is still blocked from commenting on the BCSO's Facebook page with regard to her pseudonym account.

32. On or about April 16, 2016, Plaintiff JANE DOE wrote on the BCSO's Facebook page visitor posts section, that the Defendant Sheriff ERIC WATSON was blocking and deleting comments on his government Facebook page with which the Sheriff disagreed. Her posts were deleted by or through the Defendant Sheriff ERIC WATSON or the BCSO. Exhibit B and Collective Exhibit D.

VIOLATIONS OF THE LAW

33. Plaintiffs bring this action under 42 U.S.C. § 1983 and § 1988.

34. Section 1983 of title 42 of the United States Code provides as follows:

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.

35. Within the meaning of § 1983, Defendant Sheriff ERIC WATSON and Defendant BRADLEY COUNTY are “persons.”

36. Within the meaning of § 1983, each Defendant has acted under color of law, or “any statute, ordinance, custom or usage of any State” and subjected or caused to be subjected each Plaintiff, who are each citizens of the United States or are subject to the jurisdiction of the United States, to the “deprivation of rights, privileges or immunities secured by the Constitution and laws.”

37. Defendant deprived Plaintiffs’ rights secured by the Constitution, namely the First Amendment.

38. The First Amendment to the United States Constitution, in pertinent part, provides as follows:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech ...

39. The First Amendment applies to the States, the Sheriff ERIC WATSON and BRADLEY COUNTY, against whom its provisions are enforceable.

40. Defendant Sheriff promoted or furthered, or attempted to establish or established a particular religion, the Christian religion, by his acts set forth herein.

41. Defendant Sheriff abridged the freedom of speech of Plaintiff JANE DOE, other citizens or persons and Plaintiff AMERICAN ATHEISTS.

42. Defendant Sheriff’s actions in suppressing speech are overbroad, overreaching, and are oppressive and demeaning to Plaintiffs and other citizens with whom he disagrees.

43. Defendant Sheriff ERIC WATSON's acts violated Plaintiffs' rights under the First Amendment, which applies to both him and BRADLEY COUNTY through the Fourteenth Amendment.

44. Defendant BRADLEY COUNTY participated in these violations by learning about them and intentionally taking no action to correct them, thereby continuing a course of conduct to violate the Plaintiffs' constitutional and statutory rights.

INJURY AND DAMAGES

45. Defendant Sheriff still continues to censor and delete the free speech of members of the public and Plaintiff JANE DOE and has a history of promoting his own religious views on government websites.

46. These violations of the law and the Constitution legally and proximately caused, and continue to cause, injury and damages to Plaintiffs.

47. These acts and practices – promoting and endorsing one religion or religious tradition over another and censoring and deleting posts that disagree with the Sheriff's personal religious beliefs and silencing those who disagree with the Sheriff over religion or other matters – has caused damage and injury to Plaintiff JANE DOE and Plaintiff AMERICAN ATHEISTS, its members, and the ideas for which the organization stands.

48. The actions of Defendant Sheriff – and Defendant BRADLEY COUNTY though aware of this blatantly unconstitutional conduct – and not taking

measures to stop it has the effect of silencing the Sheriff's critics and promoting the Sheriff's religious practices.

49. The actions by Defendant Sheriff have caused Plaintiff JANE DOE and Plaintiff AMERICAN ATHEISTS and certain of its members to suffer loss of sleep, worry, and feel concerned. Plaintiff AMERICAN ATHEISTS has received threats.

50. Defendant BRADLEY COUNTY's action in knowing about the conduct by the Sheriff and not taking action to stop or cure it constitutes one of its policies, practices or procedures and it looks askance at this unconstitutional conduct.

**INJUNCTIVE RELIEF: TEMPORARY RESTRAINING ORDER,
PRELIMINARY INJUNCTION AND PERMANENT INJUNCTION**

51. The actions of Defendants have caused and are causing immediate and irreparable injury, loss or damage, to Plaintiff JANE DOE and to Plaintiff AMERICAN ATHEISTS, namely, continuing violations of the First Amendment as set forth herein, which have and are continuing in spite of warning letters from Plaintiff AMERICAN ATHEISTS and comments posted on the Sheriff's website or Facebook site. Plaintiffs have no adequate remedy at law, seek redress from this Court, and the granting of injunctive relief is in the public interest.

52. Plaintiffs' counsel certifies that he has sent a letter by facsimile to both the Sheriff of Bradley County and the County Mayor and provided a copy of this suit (before filing) and that he has placed calls to their telephone numbers advising each that he was filing this lawsuit and seeking a TRO. A copy of the letters are attached as Exhibit I.

53. Plaintiffs have established the requirements in law or equity for a temporary restraining order, preliminary and permanent injunctive relief.

WHEREFORE, premises considered, Plaintiffs pray for the following relief:

1. That process issue and that Defendants be served.
2. That based upon the Verified Complaint attached to the Motion for the Individual Plaintiff to Proceed as JANE DOE” (said attachment and Verification filed under seal), the Court find that the Plaintiffs have met the requirements of a Temporary Restraining Order (TRO) and that the Court enter a TRO enjoining and restraining Defendant Sheriff as well as his Department and Office and his deputies, officers, employees, managers, staff, agents, independent contractors, assigns, successors and those acting or purporting to act on his or their behalf or the Sheriff’s or his department’s direction, from, directly or indirectly –
 - (i) Promoting, advancing or furthering any religious doctrine or religion on Defendant Sheriff’s website or Facebook site;
 - (ii) Not promote his personal religious beliefs on his governmental website, social media or Facebook site;
 - (iii) Not favor one religion over another on his governmental website, social media or Facebook site.
 - (iv) Remove each reference to personal religion and Easter on said website, Facebook or social media;

- (v) Unless obscene or involves a direct security or safety threat, not to censor any comment by any Plaintiff on governmental website, social media or Facebook site;
- (vi) Restore to Plaintiff JANE DOE the right to comment on Defendant Sheriff's public or governmental website and not delete her comments; and
- (vii) Not to delete or block any comment or post by Plaintiff JANE DOE on any of the Sheriff's public or governmental websites, Facebook pages, or other social media sites.

AND, as to Defendant BRADLEY COUNTY,

- (viii) Not advancing, assisting or aiding Defendant Sheriff or his office or Department in violating (i) – (vii) above or not acting to remedy these violations by the Sheriff.
3. That the Court combine the preliminary hearing and trial on the merits and set the hearing within fourteen days after entering a TRO.
 4. That the Court order discovery -- written, electronic, oral or otherwise – to be expedited.
 5. That the Court enter Preliminary and Permanent Injunctions enjoining the acts set forth in this Prayer for Relief, Paragraphs 2 (i) – (viii) and for any other acts or omissions related thereto for the purpose of fully enforcing Plaintiffs' rights secured by the First Amendment.

6. That the Court find that Defendants violated Plaintiffs' First Amendment rights, that the First Amendment applies to Defendants through the Fourteenth Amendment, and that Defendants violated 42 U.S.C. § 1983.
7. That the Court award each Plaintiff monetary damages for the injuries that each sustained as a result of these violations.
8. That the Court award Plaintiffs a reasonable attorney's fees, costs and other expenses as permitted by 42 U.S.C. § 1988 or other applicable law.
9. That the Court grant Plaintiffs such further and additional relief as law and equity permit and which justice requires.

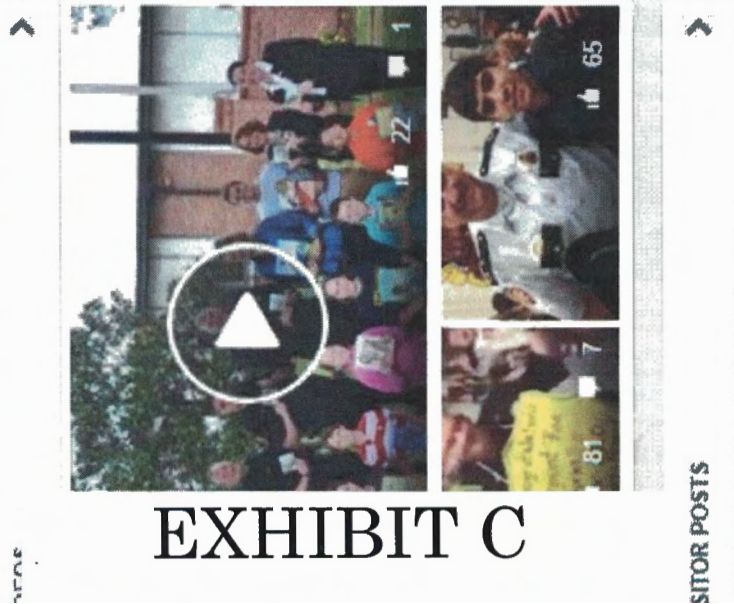
Respectfully submitted,

/s Perry A. Craft
Perry A. Craft, BPR # 006056
Law Office of Perry A. Craft, PLLC
211 Donelson Pike, Ste. 109
Nashville, Tennessee 37214
Telephone: (615) 953-3808
Facsimile: (615) 792-6292

Plaintiff's VERIFICATION was sworn to and filed as "ATTACHMENT B" to
**"MOTION FOR INDIVIDUAL PLAINTIFF TO PROCEED AS JANE DOE, A
PSEUDONYM, AND FOR HER IDENTITY, NAME AND THE
VERIFICATION TO THE COMPLAINT BE SEALED AND
REMAIN SEALED"**



EXHIBIT A



SITOR POSTS

Rick Fowler
Yesterday at 9:10am

Thank you to the fine ladies and gentlemen of the Bradley County She... See More

Bradley County Sheriff's Office
April 17 at 12:58pm

SHERIFF ERIC WATSON'S WEEKLY ARTICLE IN CLEVELAND DAILY BANNER LEADERSHIP

In a recent meeting, I heard a comment concerning our nation stating, "We need true, honest leadership in all levels of government." ... See More

Like Comment Share

31 Chronological

1 share

Mary E Woodruff I would like a neighborhood watch in my area bc maybe Windows won't get busted out then lime my was done last week.

Like Reply April 17 at 2:21pm

Mary E Woodruff Like mine not lime

Like Reply April 17 at 2:22pm

Bradley County Sheriff's Office Mary E Woodruff... call Lt. Hancock about your situation and the possibility of a Neighborhood Watch program for your area. We will be happy to help answer any questions.

Like Reply April 17 at 3:31pm

Mary E Woodruff I'm going to. It is being investigated. Thanks

Like Reply April 17 at 3:40pm

James Flowers I really like your My 'Back to Basics' policy and your Neighborhood Watch program,yep you still have a few that let that badge and gun go to there head but overall i think we got the very best guy's and gal's out watching over us.Thank you Mr. Watson for your hard work.

Like Reply April 17 at 7:35pm

Nancy Hoffiman I appreciate your posts. Thank you for letting the public know what is happening. I certainly stops the speculation that feeds the rumor mill and in turn causes dissatisfaction with public service.

Like Reply April 19 at 7:40am

Write a comment...

Create Page

- Recent
- 2016
- 2015
- 2014

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Night Nation Run - Washington
www.nighnationrun.com
\$25 Tickets (60% off) to
NIGHT NATION RUN. Use
code **JUMP** to save. Expires
Wednesday @Midn...



Stay carbsteady
amazon.com
The smart indulgent snack for
people with diabetes. Use
under medical supervision.

C

EXHIBIT C



AMERICAN ATHEISTS

March 28, 2016

Via Email

Sheriff Eric Watson
Bradley County Sheriff's Office
2290 Blythe Ave.
Cleveland, TN 37311

Dear Sheriff Watson,

On Sunday, March 27, 2016, American Atheists Legal Center received a complaint about a Facebook post that the Bradley County Sheriff's Office (BCSO) posted about the Christian holiday Easter.

American Atheists Legal Center (AALC) is part of American Atheists, Inc., a national nonprofit dedicated to the separation of religion and government and the equality of atheists. American Atheists has more than 350,000 members and supporters across the country, including in Cleveland, Tennessee and Bradley County, Tennessee.

American Atheists Legal Center found that on March 27, the BCSO posted on its official Facebook page an image stating "He Is Risen" with a message that quotes the bible and evangelizes the meaning of Easter.

Earlier on March 27, another Facebook post on the BCSO page reprinted "A Chance to Breathe", this week's article from Sheriff Watson in the *Cleveland Daily Banner*, in which the sheriff proselytizes about Easter and Jesus and quotes the bible.

A quick look back on the BCSO Facebook page and website found additional references to Christianity made by the sheriff, including:

- Feb. 29: In a post entitled "The Time We Live In", the sheriff states that "Living today is best done with a lot of prayer." Sheriff Watson also writes that he is aghast that used tires were dumped in a church lot, and notes that a "man of God" he knew has died recently.
- Dec. 21, 2015: In a post about the Winter Solstice, Sheriff Watson ends by stating "Moreover, as we say at the BCSO, Merry Christmas!"
- On the official BCSO website, Sheriff Watson offers a 12-second video welcome that ends with him saying "God bless you."

I would like to make clear that American Atheists has no issue with Sheriff Watson's personal religion. We believe strongly in the rights of individuals to their personal beliefs—religious or non-religious.

However, the instances we have specified above are not about Sheriff Watson's personal religious beliefs—they are all done in his official and professional capacity as sheriff: postings on the official BCSO Facebook page, a video message on the official BCSO webpage, a weekly article in the *Cleveland Daily Banner* in his capacity as sheriff.

"The U.S. Supreme Court has recognized that the Establishment Clause prohibits government from appearing to take a position on questions of religious beliefs or from making adherence to a religion relevant in any way to a person's standing in the political community." *ACLU v. McCreary County*, 354 F.3d 438 (6th Cir. 2003) (quoting *Lynch v. Donnelly*, 465 U.S. 668 (1984); see also *Allegheny v. Am. Civil Liberties Union*, 492 U.S. 573, 593-94 (1989).

We ask that Sheriff refrain from making statements promoting Christianity in his capacity as sheriff. According to 2010 U.S. Census data, at least 40% of Cleveland, Tennessee residents are non-religious, making them the single largest religious community after evangelical Christians. With official statements that demonstrate the sheriff's preference for Christians in the county, there may be cause to question the allocation of resources based on religion in the BCOS.

For example, in the sheriff's article "The Time We Live In," he wrote that he was particularly upset about the tires being dumped at a local church. As a non-religious person, I am curious if Sheriff Watson would have been just as upset if the tires had been dumped at a school? At a private business, such as a grocery store? What if the tires had been dumped on a private citizen's lawn? There were several postings on the Facebook page about this incident with the sheriff quoted multiple times—more postings about tire dumping at a church than about meth labs, assaults, and other crimes. This non-injurious crime seemed to be solved very quickly. Was this case given more resources and manpower because the sheriff was upset it occurred at a church?

In the same article, the sheriff mentioned a "man of God" who died recently—a local minister. While I'm sure he was a good person and his family grieves their loss, why is it appropriate for the sheriff, in his official capacity, to laud the accomplishments of a Christian minister? Would the sheriff do the same of a Jewish rabbi? A Muslim imam? A Humanist celebrant? What about an atheist who was simply a good person in the community? The sheriff's personal beliefs appear to be informing his choices as a government official.

Finally, in the Winter Solstice article on Dec. 12, 2015, the sheriff wrote that the BCSO says "Merry Christmas." That is a potentially litigious statement for a state employer to make. It is illegal to ask your employees what their religious views and practices are, and with 40% of the local population not having any religious beliefs, it also likely makes that statement an imposition of Sheriff Watson's religious beliefs on his employees. The Tennessee Human Rights Act, TN Code Sec. 4-21-401, et seq., prohibits discrimination based on religion in the workplace.

The AALC is not attacking Sheriff Watson. We respect law enforcement and the efforts of the BCSO to reach out into its community. However, we are hopeful that after this letter, the BCSO will see that its community includes many non-religious persons too, and they deserve to be treated with equal respect, dignity, and recognition as Christians. We believe the best way to do that is to stop using the BCSO as a platform to evangelize the sheriff's personal religious beliefs.

Sincerely,
Amanda Knief
National Legal & Public Policy Director
American Atheists Legal Center



AMERICAN ATHEISTS

April 5, 2016

Via Email

Sheriff Eric Watson
Bradley County Sheriff's Office
2290 Blythe Ave.
Cleveland, TN 37311
Dear Sheriff Watson,

On Monday, April 4, 2016, American Atheists Legal Center received several complaints about the Bradley County Sheriff's Office (BCSO) banning commenters and deleting reviews and posts on its official Facebook page. These comments and posts were supportive of the atheist point of view and critical of either the sheriff's office or of your advocating for your own religious beliefs while performing your duties as sheriff.

American Atheists Legal Center (AALC) is part of American Atheists, Inc., a national nonprofit organization dedicated to the separation of religion and government and the equality of atheists. American Atheists has more than 350,000 members and supporters across the country, including residents in Cleveland, Tennessee, and elsewhere in Bradley County, Tennessee.

AALC monitored the BCSO's Facebook page for several hours on April 5 and witnessed first-hand the deletion of comments that were not positive to Christianity nor to the sheriff as well as those that were positive to atheism. We did not see any obscenity; we merely saw dissent. Additionally, BCSO has disabled the Review function of its Facebook page.

The BCSO has described itself as a "government organization" on Facebook and created an open forum for the public to comment. As is evident by the activity AALC witnessed on April 5, someone from the BCSO is monitoring and curating the Facebook page. This means that taxpayer resources in the form of computer(s), energy, and personnel are being used in maintenance of the BCSO's Facebook page. As such, the BCSO has committed acts of viewpoint censorship by deleting non-obscene comments from the public view and banning users from its Facebook page.

Therefore, on behalf of a Bradley County resident who wishes to remain anonymous and under the Tennessee Open Records, Tenn. Code Ann. 10-7-503, AALC is making an official public records request to the BCSO for any emails or other electronic correspondence, such as text messages, about its social media sites, including but not limited to Facebook; any electronic records relating to the *Cleveland Daily Banner* story "Atheists condemn Facebook postings" on April 2, 2016, and/or the story's posting on the BCSO's Facebook page on April 3, 2016; any electronic records relating to comments about the story by BCSO's sheriff and/or employees; electronic records relating to Facebook reviews of the BCSO since the story was published; and/or electronic records relating to atheists or non-Christians since the story was published.

Additionally, per Tenn. Code Ann. Section 10-7-512, AALC would like a copy of the BCSO's written policy on monitoring email communications of employees and a copy of its social media policy pertaining to how comments and messages are to be monitored and curated.

Given your comments to the *Cleveland Daily Banner* that all religious and non-religious points of view are respected, AALC believes that the actions and the policies of the BCSO regarding commenters on its Facebook page are of public interest and will contribute to the public discourse about the role of religion in government business.

If there is a cost to be assessed with the production of these records, please send the breakdown of the labor and hourly cost as proscribed by law to the address below to be paid promptly. We respectfully request a response within seven (7) business days as required by Tennessee law.

Sincerely,

Amanda Knief
National Legal & Public Policy Director
American Atheists, Inc.
1220 L St. NW, Ste. 100-313
Washington, D.C. 20005



[Like](#) | [Comment](#) | [Share](#) | [108](#) | [12 shares](#) | [View 10 more comments](#)

[Audrey Fresham Congrats Bruce!](#) | [Like](#) | [Reply](#)

[Chad Shank Congrats Bruce Morgan](#) | [Like](#) | [Reply](#)

[Español](#) | [Français \(France\)](#) | [Português \(Brasil\)](#) | [Deutsch](#) | [Italiano](#)

[Create Post](#)

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[\\$25 off orders of \\$50+](#) | [HSN.com](#) | [at HSN.com when you pay with Visa Checkout. It's Mothers Day in our baby. Valid thru 4/26.](#)

[Recent](#) | [2015](#) | [2014](#) | [2013](#)

[Chat \(8\)](#)

Scamshot (21)

EXHIBIT G

PERRY A. CRAFT

ATTORNEY AT LAW
LAW OFFICE OF PERRY A. CRAFT, PLLC
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www.craftlegal.com

211 Donelson Pike, Suite 109
Nashville, Tennessee 37214
(615) 953-3808 (Office)

Post Office Box 148704
Nashville, Tennessee 37214
(615) 739-6292 (Facsimile)

May 6, 2016

VIA FACSIMILE: 423-476-0696

D. Gary Davis, Bradley County Mayor
155 Broad Street
Courthouse Annex Bldg. 2nd Floor
P.O. Box 1167
Cleveland, TN 37364

Re: American Atheists, Inc., a non-profit corporation a/k/a American Atheists
Association, and Jane Doe v. Eric Watson, Sheriff of Bradley

Dear Mayor Davis:

Please be advised that the undersigned represents American Atheists, Inc., a non-profit corporation a/k/a American Atheists Association, and Jane Doe. We are filing suit in federal court for a Temporary Restraining Order for favoring one religious point of view and from stifling and censoring free speech. A copy of the suit that is to be filed is attached we will be seeking immediate injunctive relief.

Thank you.

Sincerely,

LAW OFFICE OF PERRY A. CRAFT, PLLC



Perry A. Craft

EXHIBIT I

PERRY A. CRAFT

ATTORNEY AT LAW
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perrycraft@craftlegal.com
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211 Donelson Pike, Suite 109
Nashville, Tennessee 37214
(615) 953-3808 (Office)

Post Office Box 148704
Nashville, Tennessee 37214
(615) 739-6292 (Facsimile)

May 6, 2016

VIA FACSIMILE: (423) 473-1505

Eric Watson, Bradley County Sheriff
Bradley County Sheriff's Office
2290 Blythe Ave.
Cleveland, TN. 37311

Re: American Atheists, Inc., a non-profit corporation a/k/a American Atheists
Association, and Jane Doe v. Eric Watson, Sheriff of Bradley

Dear Sheriff Watson:

Please be advised that the undersigned represents American Atheists, Inc., a non-profit corporation a/k/a American Atheists Association, and Jane Doe. We are filing suit in federal court for a Temporary Restraining Order for favoring one religious point of view and from stifling and censoring free speech. A copy of the suit that is to be filed is attached we will be seeking immediate injunctive relief.

Thank you.

Sincerely,

LAW OFFICE OF PERRY A. CRAFT, PLLC



Perry A. Craft

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee



AMERICAN ATHEISTS, INC. a non-profit corporation
a/k/a AMERICAN ATHEISTS, and JANE DOE

Plaintiff(s)

v.

ERIC WATSON, Sheriff of Bradley County,
Tennessee, and BRADLEY COUNTY, TENNESSEE

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ERIC WATSON, SHERIFF OF BRADLEY COUNTY
BRADLEY COUNTY SHERIFF'S OFFICE
2290 BLYTHE AVENUE
CLEVELAND, TENNESSEE 37311

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

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_____ on *(date)* _____ ; or

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Other *(specify)*: _____

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: