



## COUNTERCLAIM AND THIRD-PARTY CLAIM

### PART I PARTIES

1. **THE COCKE COUNTY PARTNERSHIP, INC.** is a quasi-governmental corporation under the laws of the state of Tennessee. The Registered Agent for service of process is **LUCAS GRAHAM**, % Kimberlie Dodge, [REDACTED]  
[REDACTED]
2. **GEORGE BARTON** is a citizen and resident of Jefferson County, TN residing at [REDACTED]
3. **LUCAS GRAHAM** is a citizen and resident of Cocke County, TN, residing at [REDACTED]. He is the husband of **JAYMIE GRAHAM** and the son of **KAREN DAVIS GRAHAM**.
4. **JAYMIE GRAHAM** is a citizen and resident of Cocke County, TN, residing at [REDACTED]. She is the wife of **LUCAS GRAHAM** and the daughter-in-law of **KAREN DAVIS GRAHAM**.
5. **JACOB OTTINGER** is a citizen and resident of Cocke County, TN, residing at [REDACTED]
6. **LESLIE NICOLE SHISLER** is a citizen and resident of Cocke County, TN, [REDACTED]

7. **KAREN DAVIS GRAHAM** is a citizen and resident of Jefferson County, TN, residing at [REDACTED]. She is the mother of **LUCAS GRAHAM** and the mother-in-law of **JAYMIE GRAHAM**.

## **PART II JURISDICTION AND VENUE**

8. This cause of action arises from transactions, acts, and events that primarily took place in Cocke County, Tennessee.
9. The Circuit Court for the Fourth Judicial District, sitting at Newport, Cocke County, Tennessee, has jurisdiction and venue over the parties and issues in this case.

## **PART III FACTS**

10. **THE COCKE COUNTY PARTNERSHIP, INC.** is a quasi-governmental corporation formed by business, political, and governmental leaders in Cocke County under the corporate laws of the state of Tennessee to establish a Joint Economic and Community Development Board (or one deemed sufficiently similar by the state of Tennessee) to comply with T.C.A. Section 6-58-114.
11. **THE COCKE COUNTY PARTNERSHIP, INC.** receives funding in the form of taxpayer dollars from Cocke County, Tennessee, the City of Newport, and the Town of Parrottsville.

12. The Newport and Cocke County Economic Development Commission, Incorporated is a quasi-governmental corporation formed by business, political, and governmental leaders in Cocke County, under the corporate laws of the state of Tennessee, in an effort to establish a Joint Economic and Community Development Board (or one deemed sufficiently similar by the state of Tennessee) to comply with T.C.A. Section 6-58-114.

13. The Newport and Cocke County Economic Development Commission, Incorporated, receives funding in the form of taxpayer dollars from Cocke County, Tennessee, the City of Newport, and the Town of Parrottsville.

14. **GEORGE BARTON** is the CEO of Rural Medical Services, Inc., with an office mailing address of [REDACTED] and a physical address of [REDACTED]. He served as the Secretary in 2021-2022, Treasurer in 2023-2024, and currently Chairman for **THE COCKE COUNTY PARTNERSHIP, INC.**

15. **LUCAS GRAHAM** was an employee of **THE COCKE COUNTY PARTNERSHIP, INC.**, serving as Director/Chief Executive Officer from 2015 until he resigned in June 2024 in lieu of being fired. His salary was \$85,000.00 per year.

16. **JACOB OTTINGER** was an employee of **THE COCKE COUNTY PARTNERSHIP, INC.** in the capacity of Deputy Director from December 2022 until he resigned in June 2024. His salary was \$48,000.00 per year.

17. Despite having a salary of \$85,000.00, **LUCAS GRAHAM** stole/embezzled thousands and thousands of taxpayer dollars from Cocke County, Tennessee, the City of Newport, and the Town of Parrottsville by:

- a. **LUCAS GRAHAM** stole/embezzled thousands and thousands of taxpayer dollars from **THE COCKE COUNTY PARTNERSHIP, INC.** by using Visa credit cards from Newport Federal Bank. He used **THE COCKE COUNTY PARTNERSHIP, INC.** Visa credit cards under his own name and credit cards under the names of Jennifer Brown and Sommer White. This theft/embezzlement occurred over numerous months and numerous years.
- b. Based on information and belief, **LUCAS GRAHAM** used the Visa credit card issued in his name by Newport Federal Bank to steal/embezzle taxpayer dollars from **THE COCKE COUNTY PARTNERSHIP, INC.**
  - i. Zac Valentine is a Newport Federal Bank employee. He also served on the board of directors 2019-2020, as Vice-Chairman

2021-2022, and as the President 2023 of **THE COCKE COUNTY PARTNERSHIP, INC.**

- ii. Based on information and belief, Zac Valentine reviewed the bank Visa card statements and, because of the volume and types of charges, discovered the theft/embezzlement by **LUCAS GRAHAM.**
  - iii. Therefore, **THE COCKE COUNTY PARTNERSHIP, INC.,** including its Board of Directors and Officers, knew of **LUCAS GRAHAM's** thefts/embezzlements.
  - iv. Newport Federal Bank canceled the Visa credit card issued to **LUCAS GRAHAM.**
  - v. Newport Federal Bank refused to issue another credit card to **THE COCKE COUNTY PARTNERSHIP, INC.** in **LUCAS GRAHAM's** name.
  - vi. Despite Newport Federal Bank canceling his credit card, **LUCAS GRAHAM** continued to steal and embezzle thousands of taxpayer dollars using other **THE COCKE COUNTY PARTNERSHIP, INC.** debit and credit cards.
- c. **LUCAS GRAHAM** stole/embezzled thousands and thousands of taxpayer dollars from The Newport and Cocke County Economic

Development Commission, Incorporated, using a debit card from the U.S. Bank. He used The Newport and Cocke County Economic Development Commission, Incorporated, debit card under Jennifer Brown's name.

- d. Even after Jennifer Brown left the employment of **THE COCKE COUNTY PARTNERSHIP, INC.**, **LUCAS GRAHAM** kept the debit card in Jennifer Brown's name so he and his wife could continue to steal/embezzle thousands and thousands of taxpayer dollars from the Newport and Cocke County Economic Development Commission, Incorporated.
- e. **LUCAS GRAHAM's** thefts/embezzlements are too numerous to list in these pleadings but include and are not limited to misusing the cards by:
  - i. Paying for his personal/family Newport Utilities electric and water bills for his home at [REDACTED] 37821, on multiple occasions. Paying for **LUCAS GRAHAM's** electric and water bills using taxpayer dollars was not part of his employment agreement.
  - ii. Paying for his personal/family Spectrum cable bills for his home at [REDACTED], on multiple

occasions. Paying for **LUCAS GRAHAM**'s cable bills using taxpayer dollars was not part of his employment agreement.

- iii. Paying for his family's personal/family cell phone bills with Verizon on multiple occasions. Paying for **LUCAS GRAHAM**'s family's cell phone bills using taxpayer dollars was not part of his employment agreement.
- iv. Paying for his family's personal/family medical expenses/bills, which is listed as DRI Kasperski lab on the card statement. Paying for 100% of **LUCAS GRAHAM**'s medical bills using taxpayer dollars was not part of his employment agreement.
- v. Paying on multiple occasions for personal/family meals at various restaurants, including but not limited to the Grease Rack, Gus's Fried Chicken, Carvers Applehouse Restaurant, and Steak and Shake, just to name a few. Paying for feeding **LUCAS GRAHAM** and his family using taxpayer dollars was not part of his employment agreement.
- vi. Paying for tickets for personal/family entertainment through SeatGeek Events. Paying for **LUCAS GRAHAM**'s personal entertainment using taxpayer dollars was not part of his employment agreement.

- vii. Paying for personal/family entertainment to attend the Tennessee Smokies Baseball game. Paying for **LUCAS GRAHAM's** personal entertainment using taxpayer dollars was not part of his employment agreement.
- viii. Paying to rent cars on multiple occasions from Enterprise Car for extended personal/family trips/vacations. Paying for **LUCAS GRAHAM's** personal/family transportation for vacations using taxpayer dollars was not part of his employment agreement.
- ix. And ordering and paying for hundreds of items online from Amazon and other online companies for personal/family use. Paying for **LUCAS GRAHAM's** online purchases using taxpayer dollars was not part of his employment agreement.

18. **LUCAS GRAHAM** entered into a criminal co-conspiracy with his wife, **JAYMIE GRAHAM**, to steal/embezzle thousands and thousands of taxpayer dollars as follows:

- a. In order to further the criminal conspiracy, **LUCAS GRAHAM** provided his wife, **JAYMIE GRAHAM**, with credit and debit cards from **THE COCKE COUNTY PARTNERSHIP, INC.** under his own name and debit and credit cards under the names of Jennifer

Brown and credit cards under Sommer White so that his wife, **JAYMIE GRAHAM**, could also steal/embezzle thousands and thousands of taxpayer's dollars over numerous months and numerous years.

- b. **LUCAS GRAHAM** provided his wife, **JAYMIE GRAHAM**, with Jennifer Brown's U.S. Bank credit card so that she could also steal/embezzle thousands of taxpayer dollars from The Newport and Coker County Economic Development Commission, Incorporated.
- c. **JAYMIE GRAHAM's** thefts/embezzlements are too numerous to list in these pleadings but include and are not limited to the following:
  - i. Paying for numerous personal/family shopping/grocery bills on a regular basis at Walmart. In **LUCAS GRAHAM's** statement admitting theft/embezzlement, he confesses to 16 Walmart bills totaling \$2,380.78. However, this is only the tip of the iceberg of the theft/embezzlement by paying for personal/family shopping/grocery bills at Walmart. The various cards were used over many more months and many more years to steal/embezzle for shopping/grocery bills at Walmart. Paying for **JAYMIE GRAHAM's** Walmart bills using taxpayer dollars was not part of **LUCAS GRAHAM's** employment agreement.

- ii. Paying for their children's lunches at Newport Grammar School. **JAYMIE GRAHAM** used the cards to “load” payments for their children’s lunch meals at Newport Grammar School the transaction is listed on the credit card statement as BCS\* MPP Newport. **JAYMIE GRAHAM** using taxpayer dollars to pay for her children’s lunches at Newport Grammar School was not part of **LUCAS GRAHAM**’s employment agreement.
- iii. Paying for personal/family items at Chilhowie Sports. Paying for **JAYMIE GRAHAM**’s sports items using taxpayer dollars was not part of **LUCAS GRAHAM**’s employment agreement.
- iv. Paying for a personal/family and friends birthday party to celebrate **LUCAS GRAHAM** and **JAYMIE GRAHAM**’s son’s birthday at the NASCAR SpeedPark in Pigeon Forge in August 2022.

1. **JAYMIE GRAHAM** stole/embezzled from **THE COCKE COUNTY PARTNERSHIP, INC.** using the VISA credit card in Jennifer D. Brown’s name and charged the total cost of the NASCAR SpeedPark Package for all participants (two families - 4 parents and

4 children) to **THE COCKE COUNTY PARTNERSHIP, INC..**

2. **JAYMIE GRAHAM** then had the audacity to require the other family-friends, of their son, to reimburse **JAYMIE GRAHAM** in cash/money for the other family's cost for their NASCAR experience.
3. **JAYMIE GRAHAM** stole/embezzled taxpayer dollars from **THE COCKE COUNTY PARTNERSHIP, INC.,** using the Visa credit card, took and personally kept/pocketed the cash/money from their family-friends, and then involved her own children in the theft/embezzlement by posting pictures of her own children, putting her own children on display on Facebook as evidence of the crime, bragging about their birthday party and life of NASCAR luxury at taxpayers' and friends' expense.
4. **LUCAS GRAHAM** has lied to numerous individuals stating that the other parents/friends attending the birthday party at NASCAR were local parents considering investing in Cocke County. This was just a

birthday party for their son, organized and arranged by **JAYMIE GRAHAM**, paid for at taxpayer expense, and the other local parents never ever had any interest in investing in Cocke County.

5. **LUCAS GRAHAM** and his wife, **JAYMIE GRAHAM**, took advantage of their family friends, taking cash from them and stealing/embezzling taxpayer dollars from **THE COCKE COUNTY PARTNERSHIP, INC.**

6. Paying for **JAYMIE GRAHAM**'s birthday party experience at NASCAR for her son using taxpayer dollars was not part of **LUCAS GRAHAM**'s employment agreement.

v. In an effort to hide the theft/embezzlement, **JAYMIE GRAHAM** stole/embezzled by ordering personal/family items online using **THE COCKE COUNTY PARTNERSHIP, INC's** credit card in Jennifer D. Brown's name.

1. **JAYMIE GRAHAM** had the order(s) shipped to the Newport Grammar School in Jennifer D. Brown's name.
2. **JAYMIE GRAHAM** or her mother, then retrieved the order(s) from Newport Grammar School.

3. Paying for **JAYMIE GRAHAM's** online ordering addiction using taxpayer dollars was not part of **LUCAS GRAHAM's** employment agreement.
- vi. Ordering and paying for their children's school photos from My Life Touch. The transaction is listed on the card as MLT School. Paying for **JAYMIE GRAHAM's** children's school photos using taxpayer dollars was not part of **LUCAS GRAHAM's** employment agreement.
- vii. Ordering and paying for hundreds of items online from Amazon and other online companies for personal/family use. Paying for **JAYMIE GRAHAM's** online purchasing addiction using taxpayer dollars was not part of **LUCAS GRAHAM's** employment agreement.

19. **LUCAS GRAHAM** entered into a criminal co-conspiracy with his friend, **JACOB OTTINGER**, to steal/embezzle taxpayer dollars as follows:

- a. **LUCAS GRAHAM** provided his friend, **JACOB OTTINGER** with the credit cards from **THE COCKE COUNTY PARTNERSHIP, INC.** under **JACOB OTTINGER's** name. He also authorized **JACOB OTTINGER** to use the credit card under the name of

Sommer White so that his friend, **JACOB OTTINGER** could also steal/embezzle taxpayer's dollars.

b. Despite having a salary of \$48,000, **JACOB OTTINGER** used these credit cards to steal/embezzle taxpayer dollars from Cocke County, Tennessee, the City of Newport, and the Town of Parrottsville by:

i. **JACOB OTTINGER** attended a bachelor party in Nashville, Tennessee, and stole/embezzled taxpayer dollars by charging hotel room damages (from his drunken bachelor party), restaurant bills, and bar tabs from Nashville on the credit card issued to Sommer White by **THE COCKE COUNTY PARTNERSHIP, INC.** Paying for **JACOB OTTINGER** bachelor party expenses in Nashville using taxpayer dollars was not part of his employment agreement.

ii. **JACOB OTTINGER** electronically entered the credit card on his phone into his phone's "wallet" and used the Cash App to steal/embezzle taxpayer dollars and move cash directly from **THE COCKE COUNTY PARTNERSHIP, INC.**'s checking account to:

1. his girlfriend, Mahlia Gonzales. **JACOB OTTINGER** stole/embezzled taxpayer dollars using the Cash App on

his phone and sent numerous cash payments in multiples of \$50 to \$100 directly to his girlfriend Mahlia Gonzales. Paying for **JACOB OTTINGER's** gifts to his girlfriend using taxpayer dollars was not part of his employment agreement.

2. his friends. **JACOB OTTINGER** stole/embezzled taxpayer dollars using the Cash App on his phone and sent numerous cash payments directly to his friends. These payments in multiples of \$50 to \$100 were made during March-Madness and, upon information and belief, were gifts and/or to cover gambling debts. Paying for **JACOB OTTINGER's** gifts/gambling debts to his friends using taxpayer dollars was not part of his employment agreement.

iii. **JACOB OTTINGER** used these credit cards to steal/embezzle taxpayer dollars from Cocke County, Tennessee, the City of Newport, and the Town of Parrottsville by purchasing gas for his personal car at Love's and Weigel's gas stations and personal meals at various restaurants, including but not limited to Pizza Plus, Taco Bell, Big Boys Restaurant and the Itako Hibachi

Japanese grill. Paying for **JACOB OTTINGER's** gas and meals using taxpayer dollars was not part of his employment agreement.

20. **LUCAS GRAHAM**, his wife, **JAYMIE GRAHAM**, and **JACOB**

**OTTINGER** are criminal co-conspirators who have stolen/embezzled thousands and thousands of hard-earned taxpayer dollars from the Newport and Cocke County Economic Development Commission, Incorporated and **THE COCKE COUNTY PARTNERSHIP, INC.**

21. **LUCAS GRAHAM** admitted in writing to stealing/embezzling \$5,104.69.

However, this is only the tip of the theft/embezzlement iceberg that is sinking the Newport and Cocke County Economic Development Commission, Incorporated. The thefts/embezzlements consist of thousands and thousands of dollars from both the Newport and Cocke County Economic Development Commission, Incorporated and **THE COCKE COUNTY PARTNERSHIP, INC.** in a total amount yet to be determined because it covers multiple months, multiple years, multiple accounts, and multiple credit cards, and the total is still being calculated.

22. **LUCAS GRAHAM** as a *salaried* employee making \$85,000 per year, then steals/embezzles an additional \$4,807.06 by paying himself unauthorized hourly time-off pay from **THE COCKE COUNTY PARTNERSHIP, INC.**

to repay part of his admitted theft/embezzlement to the Newport and Cocke County Economic Development Commission, Incorporated. **LUCAS GRAHAM** literally robbed from “Peter” (**THE COCKE COUNTY PARTNERSHIP, INC**) to repay what he got caught stealing/embezzling from “Paul” (The Newport and Cocke County Economic Development Commission, Incorporated).

23. **SOMMER WHITE** was hired by the **COCKE COUNTY PARTNERSHIP, INC.**, in December 2021 as a part-time Financial Assistant. In July 2022, she was promoted full-time as the HR Manager and Finance Assistant. In November 2022 (following Jennifer Brown's departure), she was promoted to Director of HR and Finance.

- a. These thefts/embezzlements occurred before **SOMMER WHITE** was hired in 2021, continued during her entire employment with **THE COCKE COUNTY PARTNERSHIP, INC.**, and continued after her resignation in 2023.
- b. **SOMMER WHITE** made attempts to stop the thefts/embezzlements to no avail. She was even told by **LUCAS GRAHAM** not to worry about **JACOB OTTINGER's** card charges because he came from a rich family.

c. **SOMMER WHITE**'s open opposition to the thefts/embezzlements eventually led to her resignation.

24. The Newport and Cocke County Economic Development Commission, Incorporated, and **THE COCKE COUNTY PARTNERSHIP, INC.**, have been unmanaged and mismanaged by **LUCAS GRAHAM, JACOB OTTINGER, and LESLIE NICOLE SHISLER** in an effort to conceal the thefts/embezzlements.

#### **PART IV CLAIM**

##### **CIVIL CONSPIRACY TO COMMIT DEFAMATION**

25. All preceding paragraphs are incorporated and restated as if re-written verbatim.

26. In committing the acts herein alleged, the Plaintiff/Counter Defendant, **THE COCKE COUNTY PARTNERSHIP, INC.**, and the Third-Party Defendants, **GEORGE BARTON, LUCAS GRAHAM, JAYMIE GRAHAM, JACOB OTTINGER, LESLIE NICOLE SHISLER, AND KAREN DAVIS GRAHAM**, all acting in concert, committed the act of civil conspiracy by agreeing to act together to draw attention away from the co-conspirators and to harm/defame **SOMMER WHITE**, agreeing in part together and each acting for the purpose of promoting or facilitating the commission of personal torts and/or crimes against **SOMMER WHITE**, agreeing that one or more of them will engage in these acts.

27. In furtherance of this co-conspiracy **LUCAS GRAHAM** and **LESLIE NICOLE SHISLER** filed a false criminal report with the Newport City Police stating that **SOMMER WHITE** stole a hard drive from **THE COCKE COUNTY PARTNERSHIP, INC.**

28. It is alleged that the Plaintiff/Counter Defendant, **THE COCKE COUNTY PARTNERSHIP, INC.**, and the Third-Party Defendants, **GEORGE BARTON, LUCAS GRAHAM, JAYMIE GRAHAM, JACOB OTTINGER, LESLIE NICOLE SHISLER, AND KAREN DAVIS GRAHAM**, all did make the following false and defaming statements against **SOMMER WHITE**:

a. **SOMMER WHITE** was fired from **THE COCKE COUNTY PARTNERSHIP, INC.** (The truth is that she resigned. **SOMMER WHITE** is a whistleblower in this matter who worked with Richard (Rick) Vassar to help expose the theft/embezzlement and political corruption and is a cooperating witness with the Comptroller's Office.)

b. **SOMMER WHITE** stole monies from **THE COCKE COUNTY PARTNERSHIP, INC.** (The truth is that she never stole any money and resigned because she could no longer tolerate working in an environment where criminal co-conspirators **LUCAS GRAHAM**, his

wife **JAYMIE GRAHAM**, and **JACOB OTTINGER** were stealing/embezzling money and **LESLIE NICOLE SHISLER** was covering up their stealing/embezzling.)

- c. **SOMMER WHITE** stole a hard drive from **THE COCKE COUNTY PARTNERSHIP, INC.** (The truth is that **SOMMER WHITE** did not take any hard drive, including with her when she resigned. She resigned because she did not morally agree with what was happening in the office concerning theft/embezzlement of taxpayer money. She kept some evidence of the theft/embezzlement on her personal cell phone in the form of texts and emails sent to and from her phone. Pursuant to **LUCAS GRAHAM**'s instructions after her resignation, she was escorted by **JACOB OTTINGER** to get her personal items while **NICOLE SHISLER**, a co-conspirator, erased **SOMMER WHITE**'s personal cell phone in an attempt to delete the evidence. However, when **SOMMER WHITE** returned home, she was able to restore the erased texts and emails to her phone, including evidence of some of the theft/embezzlements by **LUCAS GRAHAM**, his wife **JAYMIE GRAHAM**, and **JACOB OTTINGER**.)

29. The defaming statements were made in an attempt to instill fear in **SOMMER WHITE** to prevent her from being a "whistleblower" in this

matter and prevent her from being a cooperating witness with the Comptroller's Office.

30. These statements were made with the knowledge that the statements were false and defaming to **SOMMER WHITE**, or with reckless disregard for the truth of the statement, or with negligent failure to ascertain the truthfulness of the statements.

31. **GEORGE BARTON** knew or should have known better than to rely on anything said by **LUCAS GRAHAM**.

32. **GEORGE BARTON** is a civil co-conspirator who failed and violated his responsibilities to **THE COCKE COUNTY PARTNERSHIP, INC.** by failing in the following regards:

- a. to do his due diligence on the board,
- b. to fulfill his duties and responsibilities in his positions of authority on the board,
- c. turned a blind eye to the theft/embezzlements,
- d. joining with the other civil co-conspirators to file this original lawsuit without the approval of the whole board and in order to help cover up the thefts/embezzlements by pointing the proverbial finger at the innocent: **SOMMER WHITE**,

- e. and **GEORGE BARTON** without seeking the approval of the whole board of **THE COCKE COUNTY PARTNERSHIP, INC** led the effort and agreed to pay his civil co-conspirator **LUCAS GRAHAM** a small fortune to resign, in lieu of being fired, despite knowing that **LUCAS GRAHAM** was stealing/embezzling thousands and thousands of hard-earned taxpayer dollars.
- f. failed to make any effort to require repayment of the theft/embezzlements by **LUCAS GRAHAM, JAYMIE GRAHAM,** or **JACOB OTTINGER.**

33. Third-Party Defendant **KAREN DAVIS GRAHAM** is a civil co-conspirator defaming **SOMMER WHITE** and acting in furtherance of covering up the criminal conspiracy, made numerous statements and published numerous Facebook posts, including **LUCAS GRAHAM's** lies concerning the NASCAR birthday party on Facebook in an attempt to cover up for **JAYMIE GRAHAM's** theft/embezzlement, including but not limited to the following:

Karen Davis Graham

Posts Photos



Karen Davis Graham is with The Voice of Cocke County. 1d · 🌐

Rick Vassar I was going to tag you in this post but you removed me as your friend you coward. You get on Facebook and post your Bible verses and act like such a Christian but have you confessed to your God and your followers that you actually took a stolen Jump drive that belonged to the Partnership, went through proprietary information, dug through the expense reports until you found one that my son turned in for NASCAR Speed Park when he took a prospect AND HIS FAMILY along with Lucas AND HIS FAMILY trying to bring a business to Cocke County WHICH WAS HIS JOB. Did you confess to your God that you creeped on my Daughter in laws Facebook and actually printed out pictures of MY GRANDCHILDREN and sent them out in emails and put them in envelopes along with information from STOLEN property from the Partnership you obtained and distributed to the CLB in an attempt to slander their father?

Was that the right thing to do Rick Vassar?

Did your wife Cindy confess to her God that she actually told one of her students that was just trying to pack up their books and leave her class that "Lucas Graham stole money from the Partnership to take his family on a lavish vacation and he was going to lose his job and probably go to jail". Cindy Vassar is a high school teacher where MY GRAND DAUGHTER goes to school. Was it fair to this innocent child

[Add friend](#) [Message](#) ...

DAUGHTER goes to school. Was it fair to this innocent child that was just trying to leave your class to have to hear this slander? Do you wonder why it upset this child so much that they told another teacher? Just because you were upset with Lucas's Aunt? Was that the right thing to do Cindy Vassar?

You think about that when you post your Bible verses tomorrow ok.

Lucas is an adult and he can handle this political crap because that was part of his job. He will be just fine and he will have another job before the month ends but WHEN YOU INVOLVED INNOCENT CHILDREN IN THESE POLITICAL GAMES YOU BOTH CROSSED THE LINE and you will be held accountable for that.

You did nothing but hurt innocent children and hurt Cocke County.

But I'm glad you stood up for what's right!!

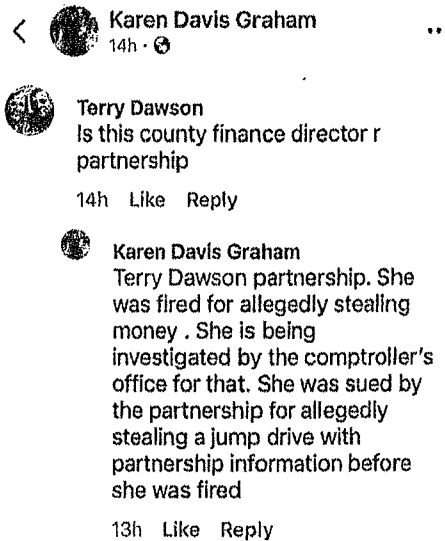
Hopefully your followers will pray for you both tonight because I won't.

You both are sick sick people.

You and I are the same age Rick Vassar and I grew up in Cocke County and I have a good memory of your past. Just so you know....

[Add friend](#) [Message](#) ...

34. Third-Party Defendant, **KAREN DAVIS GRAHAM**, is a civil co-conspirator who in furtherance of the conspiracy, published defamation on Facebook, including but not limited to, the following:



35. **SOMMER WHITE** requests damages against the Counter-Defendant and Third-Party Defendants be jointly and severally liable in a reasonable amount to be determined by the Jury.

36. This is an intentional tort to draw attention away from the co-conspirators and to defame **SOMMER WHITE**. Therefore, punitive damages against the Counter-Defendant and Third-Party Defendants be jointly and severally for five times the sum of compensatory damages are appropriate.

37. **SOMMER WHITE** requests that her attorney fees for defending this action be paid by the Counter-Defendant and Third-Party Defendants jointly and severally in this matter.

38. **SOMMER WHITE** reserves the right to amend this **COUNTERCLAIM AND THIRD-PARTY CLAIM** to add additional causes of action as discovery in this matter develops.

Therefore, based on the foregoing, **SOMMER WHITE** respectfully requests as follows:

- A. That proper process issue and be served upon the Counter-Defendant and Third Party Defendants, and that the Counter-Defendant and Third Party Defendants be required to appear and answer the **COUNTERCLAIM AND THIRD-PARTY CLAIM** within the time required by law;
- B. **SOMMER WHITE** receive compensatory damages against the Counter-Defendant and Third-Party Defendants jointly and severally in a reasonable amount to be determined by the Jury in an amount no less than \$250,000.00.
- C. **SOMMER WHITE** receive punitive damages against the Counter-Defendant and Third-Party Defendants jointly and severally in an amount five times the sum of compensatory damages in a reasonable amount to be determined by the jury in an amount no less than \$1,250,000.00.
- D. **SOMMER WHITE** requests that her attorney fees be paid by the Counter-Defendant and Third-Party Defendants jointly and severally in this matter.

Respectfully Submitted this on the 22<sup>nd</sup> day of July, 2024.



**JOHN A. BELL**

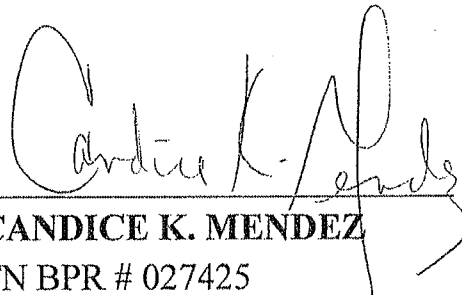
TN BPR # 10200

1209 Piney Mountain Road

Newport, Tennessee 37821

Phone: 865-266-9222

[johnaltonbell@gmail.com](mailto:johnaltonbell@gmail.com)



**CANDICE K. MENDEZ**

TN BPR # 027425

P.O. Box 2545

Newport, TN 37822

(865) 940 - 0285

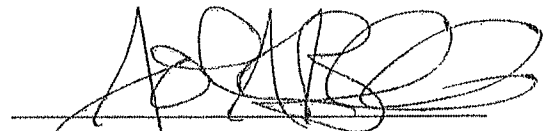
[cmendez.law@gmail.com](mailto:cmendez.law@gmail.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I served all counsel of record in this matter with a true and correct copy of the foregoing pleadings by email at their email address of record:

DAVID B. HAMILTON  
[dbh@dbhamilton.com](mailto:dbh@dbhamilton.com)

This the 22<sup>nd</sup> day of July, 2024.



**JOHN A. BELL**  
TN BPR # 10200  
1209 Piney Mountain Road  
Newport, Tennessee 37821  
Phone: 865-266-9222  
[johnaltonbell@gmail.com](mailto:johnaltonbell@gmail.com)


## COST BOND

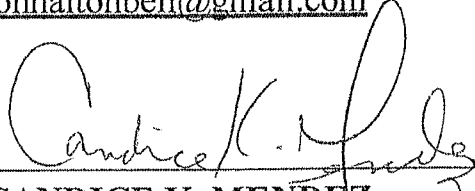
KNOW ALL MEN BY THESE PRESENTS That We, **SOMMER WHITE**, and John A. Bell, Attorney and Candice K. Mendez, Attorney and Counselors at Law, as Surety, are held and firmly bound unto the Clerk of this Court in the penal sum of the costs of this cause for the true payment of which we bind ourselves, our heirs, Executors and Administrators firmly by these presents. THE CONDITION OF THE ABOVE OBLIGATIONS IS SUCH: Whereas, the above bound Principal is commencing legal proceeding, **COUNTERCLAIM AND THIRD-PARTY CLAIMS**, in this Court of Tennessee. Now, if said Principal shall pay any and all costs which are adjudged against them, then this obligation is void, else it is to remain in full force and effect.

PRINCIPAL:

  
\_\_\_\_\_  
**SOMMER WHITE**

SURETY:

  
\_\_\_\_\_  
**JOHN A. BELL**  
TN BPR # 10200  
1209 Piney Mountain Road  
Newport, Tennessee 37821  
Phone: 865-266-9222  
[johnaltonbell@gmail.com](mailto:johnaltonbell@gmail.com)

  
\_\_\_\_\_  
**CANDICE K. MENDEZ**  
Law Office of Candice K. Mendez  
Mailing Address: PO Box 254  
Newport, TN 37822

VERIFICATION

STATE OF TENNESSEE )  
COUNTY OF Cocke )

SOMMER WHITE, after first being duly sworn according to law, makes an oath that the statements made in this **COUNTERCLAIM AND THIRD-PARTY CLAIM** are true to the best of her knowledge, information and belief. The **COUNTERCLAIM AND THIRD-PARTY CLAIM** is not made out of levity or in collusion, but in sincerity and truth for the causes mentioned in the **COUNTERCLAIM AND THIRD-PARTY CLAIM**, and that she is justly entitled to the relief herein sought.

  
SOMMER WHITE

Sworn to and subscribed before me  
This the 19 day of July, 2024.  
My commission expires: 05/29/2028

  
NOTARY PUBLIC

