

MAY 30, 2025 12:42 PM

Lindsey Taylor
Lindsey Taylor, Clerk
Monroe County, Georgia

**SUPERIOR COURT OF MONROE COUNTY
STATE OF GEORGIA**

Courtney MORGAN,)	
)	
Plaintiff,)	
v.)	Civil Action File No.
)	
MONROE COUNTY, Georgia, and the)	
MONROE COUNTY SHERIFF'S)	
OFFICE,)	JURY TRIAL DEMANDED
)	
Defendants.)	
)	
)	

COMPLAINT

COMES NOW, Plaintiff Courtney Morgan ("Mrs. Morgan"), and brings this
Complaint as follows:

INTRODUCTION

1. This is an action for damages arising out the termination of Plaintiff's employment as the Office Manager for the Monroe County Sheriff's Office. As detailed herein, Mrs. Morgan was terminated as a result of her good-faith objection to what she reasonably believed to be unlawful, inappropriate expenditures of County money by the Sheriff's Office's Director of Finance.

2. This action is brought pursuant to O.C.G.A. § 45-1-4, commonly known as the Georgia Whistleblower Protection Act (“GWA”). The GWA prohibits any public employer, including a county and Sheriff’s Office, from taking adverse employment action against a public employee in retaliation for said employee’s objection to or refusal to participate in fraudulent, wasteful, abusive, or unlawful conduct.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over Mrs. Morgan’ claims, which arise under state law. The GWA vests jurisdiction for claims brought under its authority with the superior courts of Georgia. O.C.G.A. § 45-1-4(e)(1).
4. Venue is proper in this Court because the events giving rise to this Complaint occurred in Monroe County, and defendants reside therein.
5. This action is filed pursuant to a tolling agreement with Defendants, which set the deadline to file suit as May 31, 2025.

PARTIES

6. Plaintiff is a resident citizen of the State of Georgia. She submits to the jurisdiction of this Court.
7. Defendant Monroe County, Georgia (the “County”) is a Georgia county created by the Georgia Constitution. It is a “public employer” as contemplated by the GWA.

8. The County may be served with the summons and complaint in accordance with O.C.G.A. § 9-11-4(e)(5).
9. Defendant Monroe County Sheriff's Office (MCSO) is an Office created by the Georgia Constitution. It is a "public employer" as contemplated by the GWA.
10. MCSO may be served with the summons and complaint in accordance with O.C.G.A. § 9-11-4(e)(5).
11. Mrs. Morgan operated under the direction and control of the Monroe County Sheriff. However, her formal "employer" for payroll and tax purposes was the County. MCSO and the County are pled as Defendants in the alternative. Discovery will be necessary to determine which of the two entities is properly considered her legal "employer" for purposes of the GWA, or whether the two defendants are joint employers. *See Manders v. Lee*, 338 F.3d 1304 (11th Cir. 2003).
12. This court has personal jurisdiction over each Defendant.

FACTS

13. Mrs. Morgan began her employment with MCSO on or about July 31, 2013, when she was hired as Jail Secretary.
14. She dedicated her life and career to the MCSO and the County and eventually was promoted to Office Manager / Sheriff's Assistant in December 2018.

15. At all times relevant to this Complaint, Mrs. Morgan was a “public employee” as defined by the GWA.
16. In approximately December 2022, she and her coworker Jail Secretary Anna Lewis reported theft of county property to Monroe County Sherriff Brad Freeman.
17. Christmas decorations that were purchased by the County and used the previous year were missing.
18. Monroe County Conference Center Director Candice Baswell informed Mrs. Morgan and Ms. Lewis that Sheriff’s Office Finance Director Lashuna Ussery had picked them up.
19. When Ms. Ussery was questioned about these decorations, Ms. Ussery claimed the decorations were hers.
20. However, Mrs. Morgan knew they belonged to the County, because she had purchased them with County funds, on behalf of the County.
21. When Mrs. Morgan approached Sherriff Freeman about the issue, he stated that the decorations weren’t worth much, and declined to investigate.
22. On or about April 12, 2024, while trying to book a conference for a coworker using the County’s credit card issued to Ms. Ussery, Mrs. Morgan discovered that the credit card’s billing address was listed as Ms. Ussery’s home address.

23. This was alarming to Mrs. Morgan for a number of reasons; specifically, the December 2022 Christmas incident, the fact that Ms. Ussery had reported two credit cards as compromised in under three months, past complaints from Mrs. Morgan and other staff members about Ms. Ussery's suspected use of County property for a private event planning business, and because County credit cards are usually registered to the Sheriff's Office's address.
24. Mrs. Morgan immediately informed Col. Michael Hull about the address situation and asked him if he had approved the change of address, to which Col. Hull confirmed that he did not authorize any such change.
25. Col. Hull then looked back through his emails and realized that he had not received a bank/credit card statement from Ms. Ussery or the Deputy Finance Director, Suzanne Schultek, since June 2023.
26. That afternoon Mrs. Morgan sent Col. Hull a text message reminding him to "ask for those statements," and he replied with, "I made a note to ask Lashuna about that on Monday," or words to that effect.
27. According to Mrs. Morgan, on or about April 26, 2024, while trying to book a Taser class for another employee, she noticed Ms. Ussery was still using her personal home address for the credit card.

28. Mrs. Morgan once again brought this to Col. Hull's attention, and he informed her that he would reach out to Ms. Schultek about the bank statements.
29. Col. Hull also stated that he did not want Ms. Ussery to suspect that he was looking into the bank statements.
30. On May 1, 2024, Ms. Schultek forwarded Col. Hull his own bank / credit card statement.
31. Col. Hull directed Mrs. Morgan to email Ms. Schultek requesting both Sheriff Freeman and Ms. Ussery's card statements.
32. Col. Hull regularly permitted Mrs. Morgan to use his email account and address in the furtherance of her duties.
33. As Office Manager, Mrs. Morgan often acted as Col. Hull's "proxy" and would send communications on his behalf, with his consent.
34. As she often did with his permission and instruction, Mrs. Morgan requested of Ms. Schultek copies of the credit card statements from Col. Hull's email account.
35. On May 3, 2024, Ms. Schultek responded by sending over an Excel spreadsheet containing credit card charges for each month ranging from August 2023 to April 2024.
36. Mrs. Morgan shared the information with Col. Hull.

37. Col. Hull commented that he had never received a spreadsheet before in lieu of actual statements, and he has always only received the actual statements.

38. On May 6 2024, Col. Hull informed Mrs. Morgan of several purchases on the credit card he did not believe he approved, including purchases from Amazon Marketplace, Office Depot and Walmart.

39. According to Mrs. Morgan, on May 9, 2024, she identified several suspicious transactions on the spreadsheet, which she color coded and submitted to Col. Hull.

40. The next day, Col. Hull and Mrs. Morgan went through the transactions on the spreadsheet together and Col. Hull stated that there were several thousand dollars in unapproved charges that Ms. Ussery had made, and he would never approve the many Amazon purchases or Walmart.com purchases on the spreadsheet.

41. According to Mrs. Morgan, sometime after her conversation with Col. Hull, she had a closed-door conversation with Monroe County Investigator Jacob Robins.

42. Investigator Robins later went to Col. Hull to offer his assistance if needed.

43. On May 13, 2024, Mrs. Morgan advised Col. Hull to inform Sheriff Freeman of what they had uncovered.

44. On May 15, 2024, Mrs. Morgan met with Sheriff Freeman to discuss the bank statement investigation.

45. That same day, Mrs. Morgan was called into the conference room with Captain Ricky Davis and Lieutenant Chad Beck for an Internal Affairs interview, during which she was questioned about the incidents.

46. The next day, Mrs. Morgan was called into a second Internal Affairs interview, during which she was interrogated and accused of accessing Col. Hull's computer without permission.

47. Mrs. Morgan was threatened with criminal charges.

48. At the conclusion of the meeting, Mrs. Morgan submitted text messages to Captain Davis from approximately 2020 showing Col. Hull regularly gave her permission to access his computer and email.

49. On May 17, 2024, Sheriff Freeman terminated Mrs. Morgan's employment. The reason Sheriff Freeman gave for Mrs. Morgan's termination was that he did not need her anymore.

SUBSTANTIVE CLAIM

Georgia Whistleblower Protection Act ("GWA")

50. By this reference, the above factual statements are incorporated as if fully set forth herein.

51. The GWA bars a public employer from taking adverse employment action against a public employee such as Mrs. Morgan in retaliation for the employee's objection to, or refusal to participate in, any activity, policy, or practice that the employee reasonably believes is fraudulent, wasteful, abusive, or in violation of or noncompliance with a law, rule, or regulation. O.C.G.A. § 45-1-4(d)(3).
52. The GWA further bars covered employers from taking adverse employment action against employees in retaliation for disclosing conduct to the employer that is fraudulent, wasteful, abusive, or is in violation of or noncompliance with a law, rule, or regulation. O.C.G.A. § 45-1-4(d)(2).
53. Mrs. Morgan reported and objected to what she reasonably and in good faith believed to be misappropriation of County funds by the Director of Finance.
54. Mrs. Morgan was terminated as a direct result of same.
55. The evidence will show that any valid explanation by the employer for the termination will not withstand scrutiny. For example, to the extent the employer claims that Mrs. Morgan was terminated for unauthorizedly accessing Col. Hull's email account, this will not withstand scrutiny, because she accessed the account with his knowledge and permission.

WHEREFORE, Plaintiff respectfully requests the following relief:

- A) A trial by jury;
- B) An award of damages against Defendants to compensate Plaintiff for all injuries, both economic and non-economic, proximately resulting from the Defendants' wrongful actions, in an amount to be determined by the enlightened conscious of the jury;
- C) Equitable and injunction relief to include reinstatement of employment and all benefits thereof;
- D) An award of attorney's fees and expenses of litigation;
- E) An award of pre-judgment and post-judgment interest; and,
- F) Such other relief as the Court deems just and proper.

Respectfully submitted this May 30, 2025.

/s/ James Radford
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