



HOUSE OF REPRESENTATIVES
STATE OF TENNESSEE

ETHICS COMPLAINT AGAINST SPEAKER KENT WILLIAMS
AND MOTION FOR RECUSAL

State of Tennessee
County of Fayette

COMES NOW the affiant, Brian Kelsey, who, after being duly sworn, states and deposes as follows:

1. I am a member of the Tennessee House of Representatives for the 106th General Assembly and am competent to testify to the matters contained in this Ethics Complaint, such matters being true to the best of my knowledge, information, or belief.
2. On March 27, 2007, Rep. Kent Williams solicited a sexual act from Rep. Susan Lynn in the legislative parking garage, telling her, "I will give a week's pay just to see you naked." After Rep. Lynn backed away from Rep. Williams in shock, he repeated the solicitation. The solicitations were made in the presence of Reps. Overbey and Maggart.
3. Leader Mumpower convened a meeting with Reps. Williams and Lynn, attended by staff members Stephanie Shackelford and Kara Watkins, in which Leader Mumpower reprimanded Rep. Williams for sexual harassment and in which Rep. Williams admitted the solicitations, apologized to Rep. Lynn, and pledged that he would not commit such an inappropriate act again.

4. On April 5, 2007, Rep. Williams approached Rep. Lynn from behind in the legislative plaza lobby and put his arm very tightly around her in an inappropriate manner. He placed his face uncomfortably close to hers and told her to "have a nice weekend." The inappropriate embrace was made in the presence of Rep. Sontany.

5. On April 10, 2007, Leader Mumpower reprimanded Rep. Williams once again for such behavior.

6. On January 20, 2009, Speaker Kent Williams released a public statement, saying, "I have never sexually harassed anyone nor have I been reprimanded for any such behavior."

7. The actions described herein constitute sexual harassment of Rep. Lynn by Rep. Williams.

8. The actions described herein constitute making a false, public statement with the intent to deceive on the part of Speaker Williams.

Accordingly, premises considered, Rep. Kelsey requests that the House Ethics Committee enter the following relief:

a. Remove Speaker Williams as Speaker of the House temporarily upon resolution of this Ethics Complaint;

b. Remove Speaker Williams as Speaker of the House and from any other leadership position for the remainder of the 106th General Assembly;

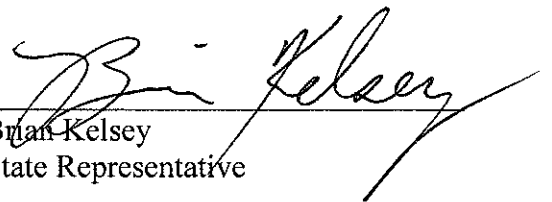
c. Make a recommendation to the House of Representatives whether Speaker Williams should be expelled as a member of the House;

d. Make a recommendation to the House of Representatives whether to punish Speaker Williams for disorderly behavior; and

e. Grant such other and further relief as the House Ethics Committee shall deem just.

Given that the Ethics Committee of the House of Representatives has yet to be appointed and given that the Speaker of the House of Representatives has a conflict of interest in appointing the members of the Ethics Committee because the allegations at the heart of this Ethics Complaint have been made against the Speaker, I move that the Speaker recuse himself from the appointment of the Ethics Committee and instead allow Leaders Odom and Mumpower to appoint the members of the Ethics Committee, each appointing members from his own party caucus in equal numbers.

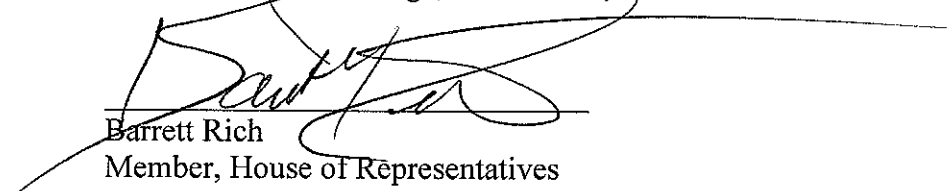
Further affiant sayeth not.



Brian Kelsey
State Representative

STATE OF TENNESSEE
COUNTY OF FAYETTE

BE IT REMEMBERED that on this 21st day of January, 2009, personally appeared before me Brian Kelsey, who, being duly sworn, makes oath that he has read the foregoing Ethics Complaint and Motion for Recusal and that the facts contained in it are true and correct to the best of his knowledge, information, or belief.



Barrett Rich
Member, House of Representatives