

IN THE CIRCUIT COURT FOR LINCOLN COUNTY, TENNESSEE
AT FAYETTEVILLE

DOROTHY SMALL, TONYA ALLEN)
and ROGER MARTINEZ)
)
Plaintiffs,)
)
v.)
)
JON LAW and TINA TOWRY OSGOOD,)
)
Defendants.)

NO. 23-CV-132

FILED
2023 OCT 26 AM 10:41
CLERK
FAYETTEVILLE

COMPLAINT

Plaintiffs, Dorothy Small, Tonya Allen, and Roger Martinez (hereinafter “Plaintiffs”), by and through undersigned counsel, file this Complaint for public disclosure of private facts against defendants Jon Law and Tina Towry Osgood (hereinafter “Defendants”). Plaintiffs, for their cause of action, state as follows:

JURISDICTION AND VENUE

1. Jurisdiction and venue are proper in this Court pursuant to Tennessee Code Ann. § 16-10-101 and § 20-4-101(a).

PARTIES

2. Plaintiff Dorothy Small is a citizen of Tennessee.
3. Plaintiff Tonya Allen is a citizen of Tennessee.
4. Plaintiff Roger Martinez is a citizen of Tennessee.
5. Defendant Jon Law is a citizen of Tennessee. Upon information and belief, Defendant Jon Law can be served with process at 908 Greenview Dr., Fayetteville, TN 37337.
6. Defendant Tina Towry Osgood is a citizen of Tennessee. Upon information and belief, Defendant Tina Towry-Osgood can be served with process at 1109 Bagley Dr.,

Fayetteville, TN 37337.

FACTS

7. At all relevant times herein, Plaintiffs have served as Aldermen for the City of Fayetteville Board of Aldermen.

8. On or about May 17, 2023, Defendant Jon Law made a post on his Facebook account with the heading “WAKE UP, PROPERTY OWNERS!!” (See Exhibit 1, Facebook post by Jon Law). In this post, Defendant Law urged the citizens of the City of Fayetteville to either call or send a text message to the City’s Aldermen to warn these individuals that the citizens of Fayetteville would not be paying for what Defendant Law called the Aldermen’s “four years of city’s operational and fiscal mismanagement and increases in long term debt.” (See *id.*). In that same post, Defendant Law published the names of each of the Plaintiffs in this matter including their personal mobile phone numbers. (See *id.*).

9. On or about June 1, 2023, Defendant Tina Towry Osgood made a post on her Facebook account where she complained that no one can see the sign at the Don Davidson Park. (See Exhibit 2, Facebook post by Tina Towry Osgood). In this post, Defendant Osgood asked Alderman David Bryant to have the City of Fayetteville Parks and Recreation Director spray Roundup at the park. (See *id.*). In that same post, Defendant Osgood published the names of each of the Plaintiffs in this matter including their personal mobile phone numbers. (See *id.*).

10. Defendants’ publication of Plaintiffs’ personal mobile phone numbers on the defendants’ Facebook accounts had no purpose other than to harass and intimidate the Plaintiffs, and was, therefore, malicious. There was no justifiable reason for publishing the personal mobile phone numbers of the Plaintiffs because the citizens of Fayetteville can contact their Aldermen via their official email addresses which are posted on the City of Fayetteville’s

website. Additionally, the City of Fayetteville's website lists an official phone number that the citizens can call if they wish to speak with any Aldermen.

11. As set forth above, Defendants posted, distributed and/or disseminated the personal mobile phones of each of the Plaintiffs throughout the Internet. In doing so, Defendants have given publicity to a matter concerning the Plaintiffs' private lives.

12. The distribution and dissemination of Plaintiffs' personal mobile phone numbers concern private matters of a kind that would be highly offensive to a reasonable person when publicized and which are not of legitimate concern to the public.

13. As a direct and proximate result of the public disclosure by Defendants of Plaintiffs' personal and private mobile phone numbers, the Plaintiffs have suffered severe mental anguish, emotional distress, worry, and embarrassment.

REQUEST FOR PUNITIVE DAMAGES

14. Plaintiffs incorporate each of the preceding paragraphs as if each is fully set forth herein.

15. Defendants have acted maliciously, intentionally, or recklessly by publishing and disseminating the personal mobile phone numbers of the Plaintiffs in a clear attempt to harass and/or intimidate them at the expense of the Plaintiffs' privacy and emotional well-being.

16. As a result of Defendants' malicious, intentional, or reckless actions, Plaintiffs are entitled to punitive damages.

WHEREFORE, premises considered, Plaintiffs pray that the Court cause service to be issued upon Defendants. Plaintiffs further demand a jury to hear this cause, and upon a hearing thereon, prays that the Court enter a Judgment for:

A. An award of compensatory damages to the Plaintiffs in the amount of Seven Hundred

Fifty Thousand Dollars (\$750,000.00);

- B. An award of punitive damages to the Plaintiffs in an amount to be determined by the jury upon an evidentiary showing of Plaintiffs' entitlement to the same;
- C. An award of reasonable expenses incurred in this litigation to the Plaintiffs, including but not limited to reasonable attorney fees and costs available to Plaintiffs.
- D. Such further and general relief as deemed appropriate by the Court.

HOWELL & FISHER, PLLC

By: 

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3310 West End Avenue, Suite 550
Nashville, TN 37203
Ph. (615) 921-5224
selliott@howell-fisher.com
Attorney For Plaintiffs

Cost Bond

I, the undersigned, Stephen W. Elliott, hereby acknowledge my firm as surety for costs not to exceed \$500.00 in regard to the above-captioned matter.


Stephen W. Elliott



Jon Law



Jon Law

Add friend

Message



REALTOR®; Licensed at Leading Edge Real Estate Group

Went to Bayside High School

Studied Marketing at Fairleigh Dickinson University

Lives in Fayetteville, Tennessee

Joined September 2008

See Jon's About Info

Friends



Home



Friends



Video



Marketplace



Notifications



Menu

<  **Jon Law**
May 17 · 



WAKE UP, PROPERTY OWNERS!!
Check out the comparison of other counties and cities' tax rates compared to Fayetteville/ Lincoln County.

Can you believe that a house in Brentwood/ Williamson Co pays less than a house in Fayetteville? Vice Mayor Danny Bryant and 5 alderman are in favor of a 50% increase in your taxes. Regardless of what house or business you own (or both!!), please call or text these alderman and let them know that you are not going to pay for their 4 years of the city's operational and fiscal mismanagement, and increases in longterm debt. Here are the alderman responsible for this predicament and their phone numbers.

Danny Bryant- 931-993-1715

Dorothy Small- 931-703-0595

Jeff Alder- 931-993-7526

Roger Martinez-256-658-4303

Tonya Allen-931-625-1688

Jacob Painter-Not responsible for debt, etc. ,but has a vote on new tax increases.

931-308-0432

County	Tax Rate	City	Tax rate	TOTAL
BEDFORD	2.3252	SHELBYVILLE	1.59	3.9152
FRANKLIN	1.6685	WINCHESTER	0.825	2.4935
GILES	1.9863	PULASKI	0.4217	2.408
MARSHALL	1.8187	LEWISBURG	1.2851	3.1038
MOORE	2.355	LYNCHBURG (METRO)	0	2.355



Home



Friends



Video



Marketplace



Notifications



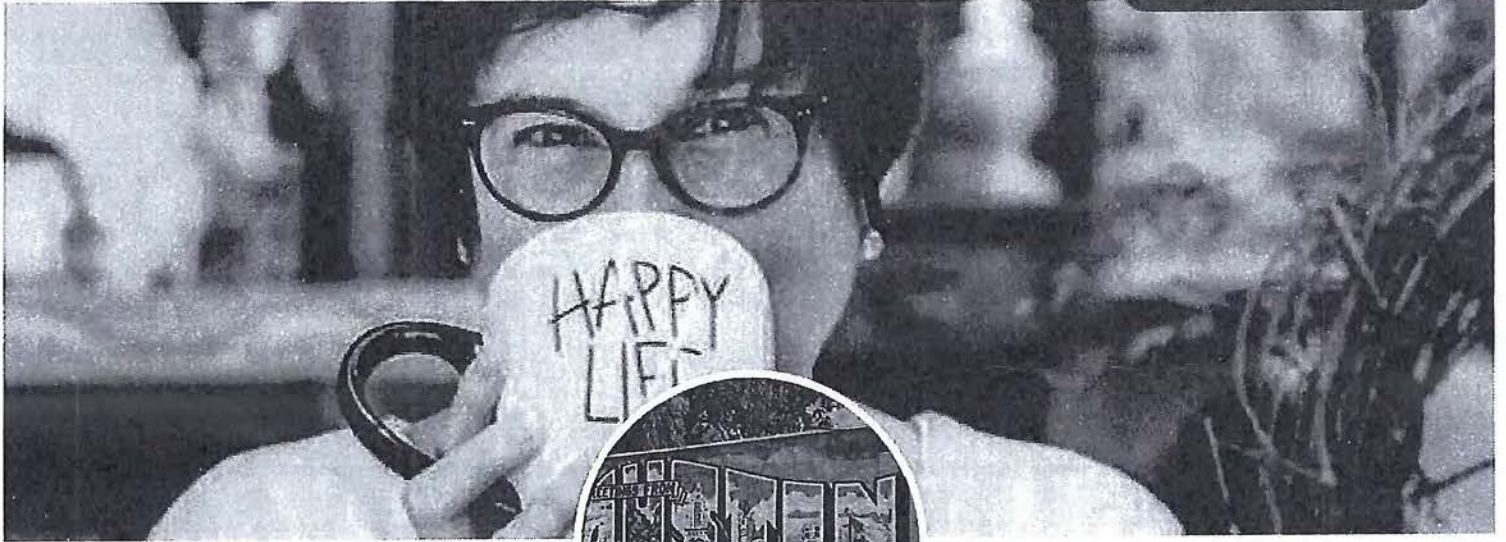
Menu



EXHIBIT

tabbles®

2



Tina Towry Osgood (Tina Towry Sanders Osgood)

1.6K friends

Add friend

Message



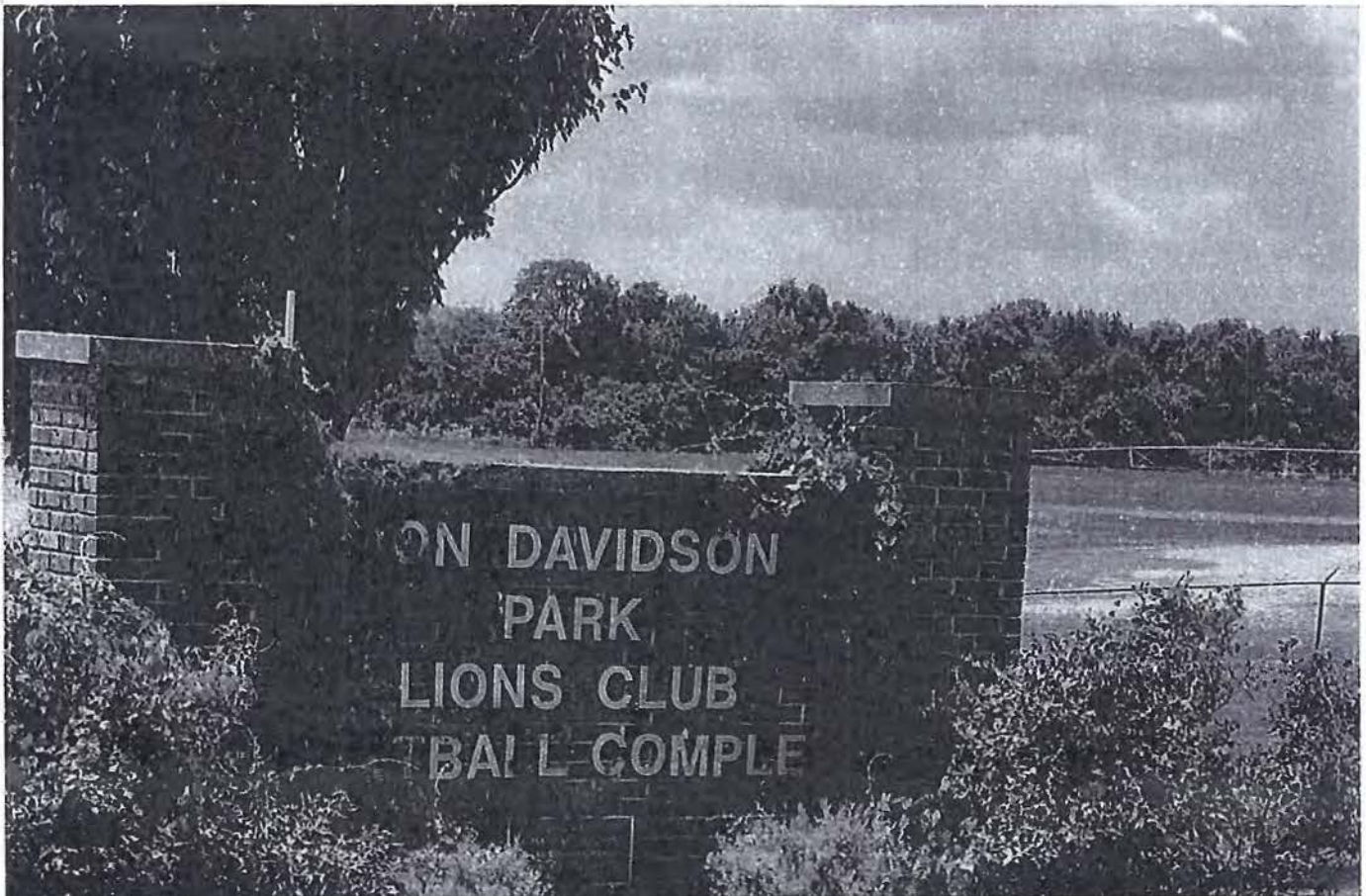


Tina Towry Osgood

June 1 · 🌐



Aldermen Danny Bryant could you please have the City of Fayetteville Parks and Recreation Director spray roundup at Don Davidson Park?? Noone can see the sign. Love the view of the 1.5 million lights and poles!!!! Hopefully one day they will work. Call call your aldermen for help! Lenace LehnertAndrew M. KelsoTeresa BrownJeanie HydeBarbara Leigh FaulknerCity of Fayetteville, TNAngel WilsonMichael GoodingGeri Shields GrayJon LawDoug GrayShannon HastonJoelSherrie Countess Madd... [See more](#)



t- 931-993-1715
 ll- 931-703-0595
 31-993-7526
 ez-256-658-4303
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