
BEFORE THE JACKSON HINDS LIBRARY SYSTEM (JHLS)

**ATTENTION: Rickey Jones, Library Board Chairman
300 North State Street
Jackson, Mississippi 39201**

NOTICE OF CLAIM FOR DAMAGES

COMES NOW Claimant, Patricia Furr, by and through her counsel, and submits this her Notice of Claim pursuant to Miss. Code Ann. § 11-46-11, *et seq.* The following facts support this Notice of Claim:

At all times relevant to her claims in this Notice, Claimant, Patricia Furr, has been an adult female resident of Hinds County, Mississippi, and is currently residing at: [REDACTED]

[REDACTED]

Claimant is a 68-year old white female resident of Hinds County and Jackson, Mississippi. Claimant was hired on July 1, 2013 as the Executive Director of the Jackson Hinds Library System (JHLS).

Claimant has been a library director or department supervisor in both public and academic libraries for a total of 27 years.

Claimant has worked for JHLS for the past seven years and has never received any disciplinary citations, nor negative performance evaluations of any kind during that time. Despite the Claimant asking the Board to evaluate her annually on numerous occasions, as required by the State of Mississippi Library Accreditation Standards, she was only given one evaluation, which was very positive, during her first year of employment in 2013.

Within the last few years, Claimant has become the target of increasingly hostile treatment by JHLS Board Chair Rickey Jones (black male) and Board Member Wayne McDaniels (black male).

Mr. McDaniels has openly bragged how many times he has successfully “flipped” white employees and replaced them with black employees.

Mr. McDaniels has regularly belittled and bullied Claimant in meetings, personally ordering her to cease doing her normal duties, such as “acting as the library spokesperson,” as in her job description, despite the fact that the only the Library Board has the authority to makes such changes in her responsibilities.

Rickey Jones, who believes himself to be the current Board Chair, was not elected to a second term as he claims. Jones was elected Board Chair for a term beginning in October of 2018, and his one year of service, as specified in the Library Board’s By-Laws, ended in September of 2019. Jones has continued to act as Board Chair beyond the expiration of his term.

A recent investigation into the Board minutes at the March 2019 Board Meeting, reveals the proposed amendment to change the term of board officers from one to two years was never voted upon nor adopted. Thus, the current slate of officers, including Mr. Jones, were not elected to an additional term as they claim to be.

This further complicates the situation with Claimant, as Mr. Jones has consistently criticized the Claimant in Board Meetings and even at times prevented her from speaking. He has threatened to fire Claimant in emails and has accused her of violating alleged board policies which do not even exist. He has repeatedly held ninety-minute-long Executive Sessions at which he slanders Claimant and accuses her of wrong conduct, including the charges for which Claimant was fired.

Mr. Jones control of the Board Chair seat has allowed him to consistently denigrate and falsely accuse Claimant to other Board members and Claimant has never been allowed to attend any of those sessions to defend her name and conduct.

Although Claimant is neither aware of the alleged accusations against her, nor has Claimant been allowed to attend Executive Sessions to speak in her defense, Claimant has heard from other Board members that she is regularly the target of false accusations made against her, with the goal of defaming her, eventually terminating her, and then replacing her.

According to Board members who are sympathetic to Claimant, Mr. Jones and Mr. McDaniels claimed that Claimant had used the library credit card to rent a personal hotel room in Atlanta for over \$1200.

This charge was the result of the library credit card number being stolen after another employee used the card to pay for her hotel room when she attended a library conference in Nashville in February of 2020.

Claimant has not even been in Atlanta except in the airport for many years.

Mr. McDaniels also falsely accused Claimant of applying for and receiving unemployment benefits while still being employed by JHLS.

Claimant inquired about the unemployment claim and was told by MDES that someone with her social security number and birthdate applied for benefits in March and April.

The claim was clearly fraudulent, as it had a different phone number, email and physical address from that of Claimants.

The HR Department, which is headed by Brenette Nichols, HR Director, never even notified Claimant of the false unemployment claims, thus putting her at considerable risk of further identity theft for the approximately four months of time during which her birthdate and Social Security number were in the possession of unknown parties without her knowledge. The HR Department also allowed Mr. McDaniels to transfer the MDES claim with Claimant's birthdate and Social Security number to his tablet device which he shared with other board members during a May, 2020 Board Meeting.

Claimant had her MDES file frozen and filed an affidavit from the AG's office with MDES.

This has now prevented Claimant from applying for unemployment benefits, which she needs, as she no longer has any income from the library system.

The other charges in the termination letter were also totally untrue.

Claimant was never given an appeal hearing to refute the charges.

The Board's proposed successor to Claimant is Ms. Brenette Nichols, currently the JHLS HR Director (black female in her 40s).

Ms. Nichols has substantially less library experience than Claimant, yet she is clearly treated preferentially by the Board.

Ms. Nichols is regularly allowed to attend closed door Executive Sessions and to hear Board conversations about Claimant, even when Claimant is not allowed to hear these conversations herself.

Ms. Nichols has even reportedly made false accusations against Claimant in these meetings, yet again Claimant is neither allowed to attend nor to defend herself against these false accusations.

On June 30, 2020, Claimant received a letter informing her that her employment was terminated.

Claimant responded by requesting an Appeal Hearing to dispute the termination.

In a letter that Claimant mailed to each JHLS Board member, Claimant asked for an appeal hearing at the July 28th Board Meeting.

The Board Members did not respond at all to Claimant's request thus denying her due process.

Claimant was further harmed when the Board of Trustees released her termination letter to Robert Graham, President of the Hinds County Board of Supervisors.

Mr. Graham leaked the contents of the termination letter including the fact that she was fired for "misappropriation of funds" to the Northside Sun newspaper.

The article that was published on July 1st also contained a quote from Mr. Graham stating that "rumors had been swirling about Claimant for the past 18 months," thus giving credence to the accusations, which are totally untrue.

Claimant did protest to the newspaper that the charges against her were false and that she did not receive any appeal hearing to dispute the charges.

The Northside Sun newspaper withdrew the original article, and published a rebuttal, but the headline stating that Claimant was terminated from JHLS Director due to misappropriation of funds remains for anyone to see.

Now Claimant cannot get a job, in a library or anywhere else, as anyone seeking to employ Claimant can search for Claimant's name on the Internet and be taken to the article link accusing Claimant of misappropriation of funds.

Claimant also has been denied the chance to work another two years and finish her 25 years of retirement in the state Public Employee Retirement System (PERS) and to reach the age for increased Social Security income.

Claimant will lose approximately \$932,000 of income in pay and benefits by being forced to retire now and not complete the optimum time as she had planned to do.

Claimant intends to assert the following state law claim against the Jackson Hinds Library System, reserving the right to bring any federal law claims related to the same set of facts but unrelated to this MTCA notice:

1. Wrongful Termination;
 2. Defamation;
 3. False Light; and
 4. Intentional Infliction of Emotional Distress.
1. Claimant intends to assert the Tortious Interference with Employment; and
 2. Tort of Outrage.

following state law claim against Wayne McDaniels and Rickey Jones, individually, reserving the right to bring any federal law claims related to the same set of facts but unrelated to this MTCA notice:

Persons with knowledge include:

1. Rickey Jones
2. Dr. Earline Strickland
3. Mary Garner
4. Sue Berry
5. Imelda Brown
6. Danny Ray Hollins

7. Dr. Alferdteen Harrison
8. Chester Ray Jones, Esquire
9. Rickey Nations
10. Rosalyn Sylvester
11. Patricia Furr

Claimant reserves the right to identify other witnesses once a lawsuit is filed, and Claimant is allowed ample opportunity to conduct discovery and identify other witnesses. Claimant is entitled to actual damages to compensate her for lost income, benefits and mental anxiety and stress. A reasonable amount to compensate Claimant for her state law claims only, would be an amount no less than \$1,000,000 to be determined by a jury.

Dated this the ___ day of August 2020.

Respectfully submitted,

CLAIMANT: PATRICIA FURR

Louis H. Watson, Jr. (MB #9053)
Nick Norris (MB #101574)
Attorneys for Claimant

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