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1745 MARTIN LUTHER KING JR. DRIVE  
ATLANTA, GA 30314

July 1<sup>st</sup>, 2026

***VIA HAND DELIVERY, EMAIL AND U.S. MAIL***

To: Attorney Stephanie Johnson and  
Attorney Patrick Jaugstetter  
Jarrad & Davis, LLP  
222 Web Street  
Cumming, Georgia 30040  
County Attorneys for Newton County, Georgia and Newton County Governing  
Authority on behalf of:

***VIA EMAIL AND HAND DELIVERY***

The Honorable Linda D. Hays  
Acting/Interim Chair  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

***VIA HAND DELIVERY***

The Honorable Stan Edwards  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

***VIA HAND DELIVERY***

The Honorable Demond Mason  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

***VIA HAND DELIVERY***

The Honorable Andre Cooper

Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

***VIA HAND DELIVERY***

The Honorable J.C. Henderson  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

***VIA HAND DELIVERY***

The Honorable LeAnne M. Long  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

***VIA HAND DELIVERY***

Mr. James Brown, Acting/Interim County Manager,  
Individually and in his Official Capacity  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

**RE: IN THE MATTER OF DR. AMANDA SHOEMAKER  
NOTICE AND APPEAL OF JUNE 25, 2026  
TERMINATION/REQUEST FOR PERSONNEL HEARING  
OFFICER**

To: Newton County Board of Commissioners, Newton County Human Resources Department, The Chairwoman, and the County Attorney:

**PREAMBLE**

As agreed upon by the County Attorney on or before June 25, 2026, the Petitioner, Dr. Amanda Shoemaker, does not and did not waive any challenges to the procedural or substantive correctness of her dismissal on June 25, 2026. Nor does Dr. Amanda Shoemaker waive any challenge as to actual and/or potential conflict of interest by the County Attorney who has also served as her Attorney for official

matters within the scope of her official duties. In addition, Dr. Amanda Shoemaker challenges the jurisdictional exercise of power by the acting/interim County Manager, Mr. James Brown, as SB423 does not/did not create an acting/interim County Manager under the charter as a vacancy succession as was done for the Chair/Board of Commissioners. The charter does not grant power to the Board of Commissioners to appoint an “acting” or “interim” County Manger, therefore any acts of James Brown are ultra vires, void, and beyond the legislative grant of authority to Newton County.

Dr. Amanda Shoemaker submits this written notice and appeal regarding the June 25, 2026, Notice of Dismissal issued by Acting/Interim County Manager James Brown terminating her employment as Human Resources Director for Newton County.

Dr. Shoemaker appeals the termination in its entirety and requests an appeal hearing before the Board of Commissioners and Personnel Hearing Officer pursuant to Newton County’s Employee Handbook and applicable County policy. Dr. Shoemaker requests that this appeal be treated as timely filed within five working days of the effective date of the adverse action.<sup>1</sup>

### APPEAL

The relief Dr. Shoemaker requests includes rescission of the termination, reinstatement to her position as Human Resources Director, restoration of all pay, benefits, seniority, leave, retirement, and all damages and other employment rights; removal of the termination and related allegations from her personnel file, correction of any public or internal statements suggesting misconduct, and any other relief deemed appropriate.

By way of professional background, Dr. Shoemaker is an experienced Human Resources executive and certified HR professional with PHR and SHRM-CP credentials. She earned both her Bachelor’s and Master’s degrees from the University of Georgia and her Doctorate in Leadership from Valdosta State University. Dr. Shoemaker has more than two decades of progressively responsible human resources experience, including employee relations, investigations, EEO compliance, policy development, recruitment and retention, classification and

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<sup>1</sup> The Charter SB423 does not set an appeal deadline for an appeal of the “County” Manager’s adverse employment action.

compensation, training, benefits administration, risk management, and organizational leadership.

Prior to serving Newton County, Dr. Shoemaker held senior HR roles with Georgia State University, Georgia Perimeter College, and Atlanta Public Schools, where her responsibilities included investigating and responding to complaints of discrimination, harassment, employee misconduct, ADA/ADAAA, ADEA, FMLA, Title VII, EEO/AA compliance, grievance matters, and employee relations concerns. Since April 2018, Dr. Shoemaker served Newton County as Director of Human Resources, where she was responsible for the vision, strategy, integration, and implementation of countywide HR operations.

During Dr. Shoemaker's tenure with Newton County, Human Resources contributed to significant employee engagement and wellness accomplishments, including back-to-back recognition for workplace well-being/employee engagement. Most recently, Newton County received Aetna's 2025 Workplace Well-being Platinum Award, its highest recognition for employee wellness and engagement. These professional credentials, responsibilities, and documented accomplishments are directly inconsistent with the unsupported characterization that Dr. Shoemaker was incompetent, unprofessional, or unable to fulfill the duties of Human Resources Director.

Dr. Shoemaker denies the allegations in the first and second Notice of Dismissal (Exhibits A and B).<sup>2</sup> The termination is unsupported, factually inaccurate, procedurally defective, inconsistent with County policy and past practice, and disproportionate. Dr. Shoemaker further believes the termination is retaliatory and discriminatory and is part of an ongoing pattern of public undermining, disparate treatment, and retaliation after she raised protected concerns, challenged prior adverse action, and pursued legal remedies as a result of her initial unlawful termination set forth in Exhibit A.

Dr. Shoemaker hereby incorporates by reference all statements and allegations

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<sup>2</sup> The first notice of dismissal is attached as (Exhibit A) and the second notice of dismissal is attached as (Exhibit B). The County Manager advised Dr. Shoemaker in (Exhibit A) to appeal to the Chair. The Chair ruled in favor of Dr. Shoemaker. The Chair reversed on procedural grounds after being confronted by the County Attorney who has assisted Mr. Brown in terminating Dr. Shoemaker, (Exhibit D). Dr. Shoemaker submits that the initial ruling in her favor was correct and final as res judicata, (Exhibit E).

made in her Ante-Litem Notice to The Newton County Governing Authority (Exhibit C).

Preliminary Response to Allegations:

**1. Development Services meeting / alleged profanity.**

Dr. Shoemaker denies using profanity during the September 11, 2025, Development Services meeting. The Department Director who called the meeting, Shena Applewhaite, has provided a written statement<sup>3</sup> indicating that Dr. Shoemaker did not use profanity (Exhibit F). Acting/Interim County Manager Brown did not interview Ms. Applewhaite or other neutral witnesses with direct knowledge before relying on disputed allegations against Dr. Shoemaker.

**2. Alleged intimidation, retaliation, favoritism, and comments regarding Ms. Patrick.**

Dr. Shoemaker denies fostering a culture of intimidation, retaliation, favoritism, or harassment. No HR employee ever raised concerns with Dr. Shoemaker regarding Ms. Patrick's performance. Dr. Shoemaker did not threaten employees regarding Ms. Patrick, and she did not retaliate against employees for criticism of Ms. Patrick. The Notice provides vague assertions without identifying dates, witnesses, documents, or specific incidents sufficient for Dr. Shoemaker to meaningfully respond.

**3. Alleged comments regarding autism or being "on the spectrum."**

Dr. Shoemaker denies ever speaking to any employee about having autism or using the words "on the spectrum" toward or about any employee. This allegation is false. The Notice does not identify any specific date, witness, employee, statement, document, or factual basis supporting this allegation. Without such information, Dr. Shoemaker is not able to meaningfully respond beyond denying that the alleged conduct occurred.

**4. "Never outshine your boss."**

Any reference to "never outshine your boss" was from a book and/or

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<sup>3</sup> Provided to the Chairwoman on or about May 18, 2026, at the hearing directed by the "acting/interim" County Manager, (Exhibit F).

organizational leadership discussion. Leadership discussions of this nature were used as motivational and professional-development tools intended to encourage self-awareness, growth, judgment, communication, and effective organizational leadership. They were not threats, directives, discipline, or attempts to chill employee feedback. The allegation mischaracterizes a motivational leadership discussion as misconduct.

#### **5. Remote work.**

Dr. Shoemaker denies inconsistently granting remote work for improper personal or family reasons. The Notice does not identify the employees, dates, requests, approvals, denials, or policy provisions allegedly violated. To the extent remote work was addressed, it was handled consistent with operational needs, County practice, and Dr. Shoemaker's authority as Department Director.

#### **6. Class and compensation study / Fire Services compression.**

Dr. Shoemaker denies that Fire Services pay compression issues were caused by her. Human Resources' role in Fire Services recruitment, hiring, interview, and salary determination processes had previously been limited, bypassed, or removed under former County Manager Lloyd Kerr. Therefore, Dr. Shoemaker cannot be blamed or faulted for Fire Services compensation issues that arose during a period when Dr. Shoemaker was excluded from meaningful control over Fire Services hiring and salary practices.

#### **7. Alleged failure to meet with Fire Services.**

The Notice states that Dr. Shoemaker reported meeting with every Department Director but that no meeting was conducted with Fire Services. This allegation ignores the history of Dr. Shoemaker's exclusion from Fire Services processes and the role of prior County leadership in removing her from Fire Services hiring and salary decisions. Dr. Shoemaker denies intentionally misrepresenting her work or avoiding Fire Services.

#### **8. Archer class and compensation study.**

Dr. Shoemaker denies being evasive regarding the class and compensation study. The study was not complete because Archer had not issued the formal/final report. The outstanding work included more than merely an introductory study narrative. Dr. Shoemaker's communications regarding the study were accurate and made in

good faith.

**9. Risk Management staffing / ACCG Risk Management account.**

Dr. Shoemaker is unaware of any salary being improperly charged to an ACCG Risk Management account. It was her understanding that the position at issue was paid through contract labor. Dr. Shoemaker was not previously informed by Finance, Risk Management, or the Acting/Interim County Manager that there was a concern regarding improper salary charging, account balance, or unauthorized use of funds. Dr. Shoemaker did not personally authorize an improper expenditure.

**10. Purchasing policy allegations.**

Dr. Shoemaker is not aware of the purchasing concerns referenced in the Notice. The Notice does not identify the purchases, vendors, dates, dollar amounts, invoices, approvals, departments, or documents allegedly involved. Dr. Shoemaker was never previously made aware by Finance or the Acting/Interim County Manager of any purchasing-policy concern involving her. Without specifics, Dr. Shoemaker cannot meaningfully respond, but she denies knowingly violating the purchasing policy.

**11. Salary adjustments for Ms. Patrick.**

Dr. Shoemaker denies misusing her position to benefit Ms. Patrick or any employee with whom she had a personal relationship. In all departments, when new hires come onboard, internal salary analytics are performed for equity reasons. Salary adjustments are routinely made when supported by internal equity, classification, recruitment, retention, and compensation considerations. The Notice mischaracterizes standard HR compensation review as favoritism.

**12. Kyra Hart / Wellness Specialist position.**

Dr. Shoemaker denies misusing her position to benefit Kyra Hart or any individual. Ms. Hart was an HR intern approximately two years ago. She was not placed in a temporary position for the current hire referenced in the Notice. The Wellness Specialist position was advertised as a full-time position. Dr. Shoemaker denies changing the position from part-time to full-time without notice to staff as alleged.

**13. Credential verification / candidate withdrawal.**

Dr. Shoemaker denies improper conduct regarding verification of credentials for the Wellness Specialist position. Human Resources' role includes verifying qualifications and credentials when needed. Any credential review was part of normal HR due diligence and was not misconduct.

**14. General claims regarding poor management, erosion of trust, and breach of public trust.**

Dr. Shoemaker denies the generalized characterizations in the Notice. Under Dr. Shoemaker's leadership, Newton County Human Resources contributed to significant employee engagement and wellness achievements, including back-to-back employee engagement/well-being recognition. These achievements are inconsistent with the Notice's unsupported claim that Dr. Shoemaker's leadership caused the alleged broad harm to employee trust and County operations.

**15. Lack of prior notice and opportunity to respond.**

The Notice includes numerous allegations that were never presented to Dr. Shoemaker before termination in a manner that allowed a meaningful response. Several allegations are vague, unsupported, newly raised, or lack identifying details. Dr. Shoemaker was not afforded a fair pre-dismissal process, and the termination was not supported by a complete, neutral, or reliable investigation.

**Document and Witness Requests.**

For purposes of Dr. Shoemaker's appeal and hearing preparation, Dr. Shoemaker requests the complete investigation file and all documents relied upon in support of the termination, including but not limited to witness statements, complaints, interview notes, recordings, emails, memoranda, payroll/accounting records, purchasing records, invoices, procurement documents, class and compensation study communications, Archer communications, Risk Management staffing records, Fire Services compensation records, Wellness Specialist recruitment records, and all communications involving Acting/Interim County Manager James Brown, Commissioners, the County Attorney, Finance, Risk Management, HR employees, Fire Services, and any witnesses relating to the allegations in the Notice.

Dr. Shoemaker also requests identification of all witnesses the County contends support the allegations and the specific allegations each witness is expected to support.

This appeal is submitted without waiving any rights, claims, defenses, remedies, grievances, EEOC claims, whistleblower claims, constitutional claims, due process claims, discrimination claims, retaliation claims, defamation claims, or other claims available to Dr. Shoemaker under County policy, federal law, Georgia law, or any other applicable authority.

Dr. Amanda Shoemaker incorporates by reference herein all attached Exhibits as if set forth fully herein.

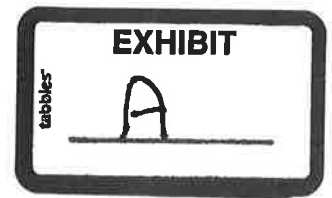
Respectfully Submitted,

/s/Dwight L. Thomas

Dwight L. Thomas

Attorney at Law

Counsel for Dr. Amanda Shoemaker



## Notice of Dismissal

**Employee Name:** Amanda Shoemaker  
**Job Title:** Human Resources Director  
**Department:** Human Resources

**Date:** April 29, 2026

### DEPARTMENT STATEMENT:

Pursuant to Chapter 9 of the Newton County Board of Commissioners Employee Handbook (the "Handbook"), I find your conduct fails to adhere to the standards expected by Newton County and that your conduct warrants immediate dismissal.

On September 11, 2025, during a Development Services meeting, Ms. Patrick was announced as the new Assistant Director for Development Services. During the meeting, you stated that you had given Lakeitha Patrick a position within Development Services because she was your friend or "bestie." You further stated that because Ms. Patrick was your friend or "bestie," that if anyone had a problem with Ms. Patrick, they would have a problem with you. In so stating, employees reported that you used profanity, making statements along the lines of if you "fuck with my friend, you fuck with me."

Your conduct has caused a significant erosion of my trust in your ability to fulfill your duties as Human Resources Director. As Human Resources Director, you hold a prominent position, and your actions and statements have a direct impact on employee trust and confidence in their ability to seek the support of Human Resources. A Human Resources Director must act fairly and in the best interests of all employees. Newton County also seeks to be an organization that puts employees first. Mistreatment or intimidation of employees will not be tolerated. Your conduct reflects poorly on your ability to be impartial and do what is best for Newton County's employees and cannot be excused.

### POLICY VIOLATIONS:

Your actions, as described above, violate the Handbook, including but not limited to:

#### Ch. 9: Disciplinary Actions, Section 902: Prohibited Conduct Generally

In general, conduct that interferes with the operations of Newton County, brings discredit to Newton County, or is offensive to Supervisors, co-workers, or the public is not tolerated. Examples of conduct that is not permitted, and will subject the individual involved to disciplinary action, up to and including immediate termination, includes, but are not limited to:

- (a) Insubordination or uncooperative attitude, including, but not limited to, disrespect to a Supervisor, co-worker, or the public, and failure to follow the lawful orders of the Supervisor;
- (g) Violation of County ordinances, administrative regulations, provisions of this Handbook, or Departmental rules;
- (j) Use of profane or abusive language or discourteous treatment of the public or other employees;

- (u) Use or threatening of use, or attempt at use of personal or political influence to secure employment benefits, including but not limited to, Promotion, leave of absence, Transfer, change of pay rate, or character of work;
- (z) Violation of any provisions of the Newton County Ethics Code, this Handbook, or the applicable Department's standard operating procedures ("SOP").

## **Chapter 2: General Provisions, Section 200: Introduction**

Employees covered by this Policy are employed to fulfill certain duties and expectations that support the mission and values of Newton County and are expected to conduct themselves in a manner deserving of public trust. The following list is not all-inclusive but is intended to illustrate the minimum expectations for acceptable workplace conduct and performance.

- Perform assigned duties and responsibilities with the highest degree of public trust.
- Demonstrate respect for the department and toward coworkers, supervisors, managers, subordinates, residential clients, and customers.
- Make work-related decisions with integrity and/or take actions that are in the best interest of the County.
- Comply with the letter and spirit of all County and departmental policies and procedures.
- Conduct themselves at all times in a manner that supports the mission of their department and the performance of their duties.

### **Section 1-104. Code of Ethics for Members of Boards, Commissions, Authorities, Elected Officials and County Department Heads**

(a) Any County official and County department head shall:

- (9) Never engage in other conduct which is unbecoming to a member or which constitutes a breach of public trust.

### **EMPLOYMENT ACTION:**

#### **Ch. 9: Disciplinary Actions, Section 910: Dismissals**

An employee may be dismissed from employment with Newton County for disciplinary purposes.

Effective immediately, your employment with Newton County is hereby terminated.

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You have a right to file a Level 3- Grievance with the Chairman of the Board of Commissioners. If you choose to file a grievance, it should be signed by you and submitted in writing, declaring any of the following grievable actions:

- Unsafe or unhealthy working conditions; or
- Misapplication of County policies in violation of the Employee Handbook.

I certify that a copy of this Notice of Dismissal was given to Dr. Shoemaker on the indicated date:

\_\_\_\_\_

Date

\_\_\_\_\_

Appointing Authority/Designee's Signature

\_\_\_\_\_

Date

\_\_\_\_\_

Employee's Signature

Copy to Human Resources for employee file



### Notice of Dismissal

**Employee Name:** Amanda Shoemaker  
**Job Title:** Human Resources Director  
**Department:** Human Resources

**Date:** 6-25-26

#### DEPARTMENT STATEMENT:

This notice is formal notification of the immediate termination of your employment with Newton County. Pursuant to Chapter 9 of the Newton County Board of Commissioners Employee Handbook (the "Handbook"), I find your termination warranted for your failure to adhere to the conduct and performance standards expected by Newton County.

On September 11, 2025, during a Development Services meeting, Lakeitha Patrick was announced as the new Assistant Director for Development Services. During the meeting, you stated that you had given Ms. Patrick a position within Development Services because she was your friend or "bestie." You further stated that because Ms. Patrick was your friend or "bestie," that if anyone had a problem with Ms. Patrick, they would have a problem with you. In so stating, employees reported that you used profanity, making statements along the lines of if you "fuck with my friend, you fuck with me."

Correspondingly, employees reported that you fostered a culture of intimidation within your own department. Human Resources Department employees expressed feeling threatened, belittled, and harassed by your statements and concerns for retaliation and favoritism. For example, they felt threatened by you when it came to any criticism of Ms. Patrick's performance, belittled when you spoke of your own qualifications and expressed doubt about their own, and felt harassed when you made comments that they may be "on the spectrum," that is have, autism. An employee further reported that you made statements such as "you never outshine your boss," which chilled the employee's desire to offer feedback or make contributions. The employee also reported that you inconsistently granted remote work for family and personal circumstances. These are solely examples of your unprofessional and inappropriate behavior. Multiple employees within and outside of your department report fearing or experiencing ostracism and retaliation when interacting with you.

Your poor treatment and management of employees is very concerning, unprofessional and inappropriate. It supports the termination of your employment, standing alone.

Nonetheless, I further find as independent grounds for your termination your failure to competently perform your duties. Human Resources engaged a contractor, The Archer Company, to perform a classification and compensation study. In conjunction with the study, you reported that you had meetings with every Department Director to review employee data. However, no meeting was conducted with the Fire Service Department. As a result, there are ongoing pay compression issues with Fire Service employee salaries. Additionally, your implementation of the classification and compensation study was at times inconsistent with the contractor's recommendations, creating additional concerns for lack of competency or intentional unfairness. Further, when asked to provide the results of the study, you were evasive and declined to provide information, stating the study was not complete, even though the only outstanding item was the introductory study narrative.

Your management of Risk Management staffing further reflects concerns with your ability to competently perform your duties. You authorized the hiring of an employee to assist the Safety & Risk Manager and reported that the position would be funded by an account for contract labor. Instead, the salary was charged to an ACCG Risk grant account. Such funds have a specified limited purpose, and salary expenditures were not authorized at the time. Charging the salary to the account also resulted in the account balance being exceeded. When questioned by the Safety & Risk Manager, you stated that you needed to use the contracted labor funds for something else.

As an additional, independent basis for your termination, I find you failed to follow the County's Purchasing Policy and Procedures. As stated in the County's financial policy, any employee who does not comply with the policy shall be subject to disciplinary action. The policy requires that for purchases of capital goods, supplies, and services over \$5,000, departments are required to obtain at least three (3) competitive written quotes or document why the department is unable to obtain multiple quotes. The department is to then send the purchase request to the Finance Department for approval prior to incurring the expense. As a Department Director, you knew or should have known of this policy. However, for multiple procurements between December 2024 and April 2026, you did not follow this policy, failing to obtain the necessary written quotes with no documentation as to the reason for the failure and obligating the County to pay for the goods or services without the appropriate authorization.

In addition to your poor treatment of staff, your failure to competently perform your duties, and your failure to follow the financial policy, it also appears that you have misused your position to benefit individuals with whom you have a personal relationship. When Ms. Patrick was hired, you directed the initial offer of her salary to be increased to bring her in at a "high level." To justify this increase, adjustments were made to two other positions within the department. In the hiring of Kyra Hart, who is reportedly your goddaughter, there are several points of concern, including initially creating a temporary position for Ms. Hart to occupy; informing staff interested in a Wellness Specialist position that the position was part-time and then changing the position to full-time without notice to staff; and personally performing the verification of credentials for the Wellness Specialist position, including meeting with the top candidate after they had already been recommended by the interview panel, only for the candidate to withdraw.

Your conduct has caused a detrimental erosion of my trust in your ability to fulfill your duties as Human Resources Director. As Human Resources Director, you hold a prominent position, and your actions and statements have a direct impact on employee trust and confidence in their ability to seek the support of Human Resources and on their experience working for the County overall. A Human Resources Director must act fairly and in the best interests of all employees. Newton County also seeks to be an organization that puts employees first. Mistreatment or intimidation of employees will not be tolerated. Your conduct reflects poorly on your ability to be professional, impartial, and do what is best for Newton County. Likewise, as Human Resources Director, you are charged with ensuring that all County employees are treated fairly and consistently. Yet, you failed to do so, including in your implementation of the class and compensation study and in other actions related to employee salaries, hiring, and benefits. Moreover, your repeated failure to follow financial policies reflects poorly on your ability to hold a position of such high trust as Director of Human Resources. Your conduct cannot be excused.

#### **POLICY VIOLATIONS:**

Your actions, as described above, violate the Handbook, including but not limited to:

#### **Ch. 9: Disciplinary Actions, Section 902: Prohibited Conduct Generally**

In general, conduct that interferes with the operations of Newton County, brings discredit to Newton County, or is offensive to Supervisors, co-workers, or the public is not tolerated. Examples of conduct that is not permitted, and will subject the individual involved to disciplinary action, up to and including immediate termination, includes, but are not limited to:

- (a) Insubordination or uncooperative attitude, including, but not limited to, disrespect to a Supervisor, co-worker, or the public, and failure to follow the lawful orders of the Supervisor;
- (b) Failure to do work at an acceptable level of competence as determined by the Elected Official or Department Director;
- (g) Violation of County ordinances, administrative regulations, provisions of this Handbook, or Departmental rules;
- (j) Use of profane or abusive language or discourteous treatment of the public or other employees;
- (z) Violation of any provisions of the Newton County Ethics Code, this Handbook, or the applicable Department's standard operating procedures ("SOP").

**Chapter 2: General Provisions, Section 200: Introduction**

Employees covered by this Policy are employed to fulfill certain duties and expectations that support the mission and values of Newton County and are expected to conduct themselves in a manner deserving of public trust. The following list is not all-inclusive but is intended to illustrate the minimum expectations for acceptable workplace conduct and performance.

- Perform assigned duties and responsibilities with the highest degree of public trust.
- Demonstrate respect for the department and toward coworkers, supervisors, managers, subordinates, residential clients, and customers.
- Make work-related decisions with integrity and/or take actions that are in the best interest of the County.
- Resolve work-related issues and disputes in a professional manner and through established business processes.
- Comply with the letter and spirit of all County and departmental policies and procedures.
- Conduct themselves at all times in a manner that supports the mission of their department and the performance of their duties.

**Section 1-104. Code of Ethics for Members of Boards, Commissions, Authorities, Elected Officials and County Department Heads**

(a) Any County official and County department head shall:

- (9) Never engage in other conduct which is unbecoming to a member or which constitutes a breach of public trust.

**EMPLOYMENT ACTION:**

**Ch. 9: Disciplinary Actions, Section 910: Dismissals**

An employee may be dismissed from employment with Newton County for disciplinary purposes.

Effective immediately, your employment with Newton County is hereby terminated.

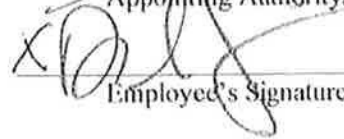
According to Section 2-105(c)(4)(b) of the Newton County Code, you have the right to appeal your termination to the Board of Commissioners.

I certify that a copy of this Notice of Dismissal was given to Dr. Shoemaker on the indicated date:

6-25-24  
Date

X 6-25-2024  
Date

  
Appointing Authority/Designee's Signature

  
Employee's Signature

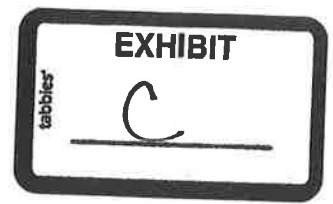
Copy to Human Resources for employee file

OF COUNSEL:  
Bianca Calloway  
Taylor Leftwich  
Mohammed S. Luwemba  
Teri L. Thompson  
Independent Attorneys

# DWIGHT L. THOMAS, P.C.

ATTORNEYS AT LAW  
(404) 522-1400 (OFFICE) (770) 723-9115 (FAX)

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ATLANTA, GA 30345

1745 MARTIN LUTHER KING JR. DRIVE  
ATLANTA, GA 30314

June 2, 2026

*VIA EMAIL and CERTIFIED MAIL: 7012 2210 0002 3674 9714*

To: Attorney Patrick Jaugstetter, County Attorney for  
Newton County, Georgia and Newton County Governing Authority  
on behalf of:

*VIA EMAIL and CERTIFIED MAIL*

*RETURN RECEIPT: 7012 2210 0002 3674 9738*

Honorable Linda D. Hays  
Acting/Interim Chair  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

*VIA CERTIFIED MAIL*

*RETURN RECEIPT: 7012 2210 0002 3674*

The Honorable Stan Edwards  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

*VIA CERTIFIED MAIL*

*RETURN RECEIPT: 7012 2210 0002 3674 9752*

The Honorable Demond Mason  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

*VIA CERTIFIED MAIL*

*RETURN RECEIPT: 7012 2210 0002 3674 9769*

The Honorable Andre Cooper  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

*VIA CERTIFIED MAIL*

*RETURN RECEIPT: 7012 2210 0002 3674 9776*

The Honorable J.C. Henderson  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

*VIA CERTIFIED MAIL*

*RETURN RECEIPT: 7012 2210 0002 3674 9783*

The Honorable LeAnne M. Long  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

*VIA CERTIFIED MAIL*

*RETURN RECEIPT: 7012 2210 0002 3674 9790*

Mr. James Brown, Acting/Interim County Manager,  
Individually and in his Official Capacity  
Newton County Board of Commissioners  
1124 Clark Street  
Covington, Georgia 30014

**RE: DR. AMANDA SHOEMAKER, Complainant and My Client  
NOTICE OF CLAIM/ANTE-LITEM NOTICE AGAINST  
NEWTON COUNTY AND THE NEWTON COUNTY  
GOVERNING AUTHORITY AND JAMES BROWN IN HIS  
INDIVIDUAL AND OFFICIAL CAPACITY.**

**CLAIMS: WRONGFUL TERMINATION, HOSTILE WORK  
ENVIRONMENT, VIOLATIONS OF GEORGIA  
CONSTITUTION'S FREEDOM OF SPEECH AND  
CONSCIENCE, VIOLATION OF GEORGIA/FEDERAL  
CONSTITUTION DUE PROCESS PROTECTIONS AND**

**EQUAL PROTECTION OF THE LAWS, DEFAMATION,  
VIOLATION OF GEORGIA WHISTLEBLOWER  
PROTECTIONS ACT, VIOLATION OF O.C.G.A. 45-1-4 through  
O.C.G.A. 45-1-8, O.C.G.A. 16-14-4 and O.C.G.A. 16-14-6.**

To All Parties Concerned:

FACTUAL BASIS

Dr. Amanda Shoemaker is a Ph.D. graduate of the University of Georgia and served, since on or about 2018, as the Human Resources Director for Newton County, Georgia. In this role she served and performed at all times in an exemplary manner.

On or around 10:00 a.m. on April 28, 2026, interim/acting County Manager James Brown summoned Complainant Dr. Amanda Shoemaker to his office without any prior notice or explanation or opportunity to refute or rebut. Mr. Brown then summarily terminated the Complainant. Thereafter, Mr. Brown informed the staff of the Complainant that she had been fired. Mr. Brown then informed the Sheriff and other public officials, including the Judges of the Newton County Superior Court that Complainant was fired. Mr. Brown then informed the Chamber of Commerce and the Director of Senior Services that Complainant had been fired.

In the meeting with Mr. Brown the Complainant was personally issued a "Notice of Dismissal" (Exhibit A), which set forth the allegations for her dismissal and specifically advised Complainant to appeal her dismissal, if dissatisfied, to the Board Chair (Linda Hays) as set for the for a level 3 grievance. Complainant followed the level 3 grievance procedure as directed by Mr. Brown and filed her appeal on or before May 1, 2026 (Exhibit B).

Complainant hired Counsel and an appeal hearing was held on May 18, 2026, with Counsel for Chairwoman Hays present as well as the Chair. The Complainant gave testimony and provided documentary evidence as well as argument of Counsel. On May 27, 2026, the Chair issued a decision in Complainant's favor and re-instated Complainant to her former position immediately with back pay and benefits (Exhibit C).

On or around May 28, 2026, Complainant returned to her job and was met by Mr. Brown who subjected Complainant to bullying, threats and hostilities. Complainant requested law enforcement protection for her personal safety and the

same was granted. Complainant was terrified, humiliated and subjected to a hostile work environment believing at any moment Mr. Brown would physically attack her or continue heaping emotional workplace abuse on Complainant. Later on May 28, 2026, the Chair reversed her position (Exhibit D). Complainant had previously reported to law enforcement and others her good faith belief that Mr. Brown has engaged in impropriety covered by O.C.G.A. 45-1-4 et seq., and the Georgia Racketeering laws (and Georgia Whistleblower Act) aided and abetted by co-conspirators in the public and/or private sector. Complainant has compiled documentation to support her whistleblower claims and is prepared to present the same in the appropriate forum.

This is a pre-litigation demand to settle all of complainant's claims, including her wrongful termination that will include a neutralization withdrawal of her termination<sup>1</sup> in favor of her voluntary departure in settlement. Complainant reserves the right to supplement/amend this notice within the time allowed by law.

The Complainant demands, in exchange for foregoing litigation and/or reinstatement with all back pay benefits, the following<sup>2</sup>:

- (1) Compensatory damages of One Million Dollars (\$1,000,000.00), for wrongful termination and defamation; and
- (2) One Million Dollars (\$1,000,000.00), for all other damages for her claims.

Respectfully Submitted,



Dwight L. Thomas

Attorney at Law

Attorney for Dr. Amanda Shoemaker,  
Complainant

Georgia Bar No. 704825

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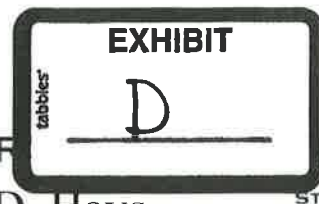
<sup>1</sup> Mr. Brown has later publicly posted that Complainant is on administrative leave with pay and apologized for the confusion he created with the narrative of her being fired.

<sup>2</sup> Complainant incorporates all exhibits as if set forth fully herein.



NEWTON COUNTY  
**BOARD OF COMMISSIONERS**

From the Desk of Chairman Linda D. Hays



LINDA D. HAYS  
CHAIRMAN  
STAN EDWARDS  
DISTRICT 1  
DEMOND MASON  
DISTRICT 2  
ANDRE COOPER  
DISTRICT 3  
J.C. HENDERSON  
DISTRICT 4  
LEANNE M. LONG  
DISTRICT 5  
JAMES BROWN  
COUNTY MANAGER  
SUSAN NOLLEY  
COUNTY CLERK

May 28, 2026

Dr. Amanda Shoemaker  
Former Director of the Newton County Human Resources Department  
Covington, Georgia 30014

via Email and Hand Delivery

cc: Newton County Board of Commissioners  
Jarrard & Davis, LLP  
Sheriff Ezell Brown, Newton County Sheriff's Office  
Acting County Manager, James Brown

re: Rescission of Letter Dated May 27, 2026

Dear Dr. Shoemaker:

On May 27, 2026, pursuant to the authority that I believed I had under the Newton County Employee Handbook, I issued a finding "reversing" Dr. Amanda Shoemaker's removal from her position as Director of the Newton County Human Resources Department.

Equally, on May 27, 2026, I learned from our legal representation, Jarrard & Davis, LLP, that under Newton County's Enabling Legislation, the Board of Commissioners, not the Chair, has the authority to review a termination of a Department Head. I was not aware of this limitation at the time I made my decision and issued my letter on May 27, 2026.

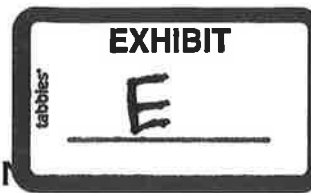
Understanding the limitations of the Chair's authority, and under the advisement of our legal team, I now rescind my letter of May 27, 2026, in which I sought to reinstate Dr. Shoemaker's employment status. If Dr. Shoemaker is subjected to adverse employment action, she has the right to pursue appropriate remedies available to her under the law.

Respectfully,

Chairman, Newton County Board of Commissioners



NEWTON COUNTY  
BOARD OF COMMISSIONERS



LINDA D. HAYS  
CHAIRMAN

May 27, 2026

To: Amanda Shoemaker, Human Resources Director  
From: Linda D. Hays, Interim Board Chairman  
Cc: James Brown, Interim County Manager

Re: Grievance/Appeal Decision

On May 1, 2026, I received your written Level 3 Notice of Grievance presenting a grievance/appeal for review of Interim County Manager James Brown's April 29, 2026, decision terminating your employment. This correspondence sets forth my decision on your grievance/appeal.

As an initial matter, I find that your grievance/appeal is proper. You assert that County Manager Brown's decision as detailed in the Notice of Dismissal is based on a misapplication of County policies in violation of the Employee Handbook, which is a grievable action (Sec. 1005, Employee Handbook).

County Manager Brown's April 29, 2026, Notice of Dismissal states that you are terminated effective immediately pursuant to Chapter 9: Disciplinary Actions, Section 910: Dismissals (Employee Handbook) for disciplinary purposes. Section 910 states that an employee may be dismissed from employment for disciplinary purposes. However, Section 910 also refers to Section 808 (Chapter 8: Separations) for details relating to the dismissal process.

Pursuant to Section 808 (Dismissals), an emergency Dismissal for disciplinary reasons may be instituted without proper notice when deemed necessary to protect the immediate safety and security of employees. In all other cases, specific provisions including providing the employee notice of the reasons for termination, and the opportunity to respond to the reasons during a pre-dismissal conference prior to the dismissal shall be followed.

Based on my review of the Notice of Dismissal, Notice of Grievance and relevant policies, and information provided by you during our May 18, 2026, appeal meeting, and information provided by County Manager Brown during my discussions with him, I find that the procedures for dismissal required by Sec. 808 were not followed. The facts establish that County Manager Brown issued his Notice of Dismissal to you on April 29, 2026, terminating your employment effective immediately. At that time, he called you to his office and provided you with the Notice of Dismissal but did not discuss it with you. Prior to receiving the Notice of Dismissal dated April 29, County Manager Brown did not (1) notify you that you were being investigated for allegations of misconduct, (2) notify you that he was considering terminating your employment, (3) provide you with the reasons he was considering terminating your employment, (4) schedule a pre-dismissal conference with you, or (5) give you an opportunity to respond to any allegations against you which formed the basis for the dismissal decision and/or provide additional information for consideration before he proceeded with your dismissal. (See Employee Handbook, Sec. 808)

The reason for these procedures is to ensure that the County's personnel decisions are based on as much relevant information as possible. I find that County Manager Brown's failure to follow established policy and procedure in implementing the dismissal is a misapplication of County policy in violation of the Employee Handbook and lacked the benefit of comprehensive information these procedures would have brought to light. For this reason, it is my decision that you are reinstated to your position as Human Resources Director effective immediately.

In addition, you are to be paid back wages and have all your benefits reinstated retroactive to the date of termination (April 29, 2026) and all other terms and conditions of your employment are to be restored immediately.

Regards,



Linda D. Hays  
Chairman, Newton County Board of Commissioners  
[LDHays@co.newton.ga.us](mailto:LDHays@co.newton.ga.us)  
(678) 625-1201



To whom it may Concern,

05/12/2026

In or around September 10–11, 2025, I asked Ms. Patrick to update her email signature to reflect her new title. The County had recently completed the Compensation and Classification Study, which resulted in several departmental positions, including hers, being reclassified. Ms. Patrick updated her signature accordingly.

Shortly afterward, I became aware of significant “buzz” among certain staff members. Although no one approached me directly, I was informed that rumors were circulating regarding Ms. Patrick’s new title and her relationship to Dr. Amanda Shoemaker, the HR Director.

I later received a call from Dr. Shoemaker, who requested to meet with me. I met with her, and the Deputy HR Director, Angela Mantle. Dr. Shoemaker informed me that her department had also heard there were concerns about the reclassified positions, including Ms. Patrick’s. I explained that I planned to address the matter at the next staff meeting, but she recommended addressing it as soon as possible to prevent further misinformation.

I called a staff meeting at 3:30 p.m. on September 11 and requested that an HR representative attend to explain the Compensation and Classification process. Dr. Shoemaker and Ms. Mantle along with HR staff member, Marissa Grey attended. At the meeting, I informed staff that rumors had been circulating and clarified the following:

- The Compensation and Classification Study was conducted by the County.
- All staff received salary adjustments based on the study’s findings.
- Each employee should have received a letter from HR outlining the specifics of their position.
- Several positions in the department were reclassified, including:
  - o ZIP positions → Development Technicians (**3 positions**)
  - o Receptionist → Senior Administrative Specialist
  - o Administrative Coordinator → to Assistant Director (Ms. Patrick’s position)

All positions in the department received an increase in salary.

Dr. Shoemaker then addressed the group. She explained that the study considered qualifications, duties performed, and other objective factors when determining salary adjustments and reclassifications. She also directly addressed the rumor that Ms.

Patrick was her "best friend," stating that Ms. Patrick's reclassification was based solely on her qualifications and job duties, consistent with all other reclassifications.

Dr. Shoemaker further clarified that when she was hired, she made it clear that if Ms. Patrick did not perform to expectations, she would be subject to termination like any other employee. Staff appeared surprised by this information. At no time did Dr. Shoemaker use profanity when addressing staff.

After ensuring all concerns were addressed, I asked if there were any additional questions. No staff members raised further issues, and I concluded the meeting.

  
Shena Applewhaite

Director, Development Services

Investigation

tabbies  
**EXHIBIT**  
G



**NEWTON COUNTY BOC**  
**Notice of Administrative Leave with Pay**

Employee Name: Dr. Amanda Shoemaker  
Job Title: Human Resources Director  
Department: Human Resources

Date: May 28, 2026

**DEPARTMENT STATEMENT:**

Pursuant to Newton County BOC Employee Handbook policy, *1116 Administrative Leave*; An Elected Official or Department Director, the Human Resources Director, or their respective designee, with notification to the Human Resources Department, may place an employee on administrative leave when an employee is being investigated by Newton County for possible misconduct or by a law enforcement department for possible violation of a criminal law or in any instance where it is considered to be in the interest of Newton County and/or the employee.

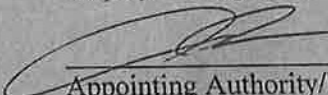
**EMPLOYMENT ACTION:**

You are being placed on administrative leave effective May 28, 2026

*Per policy, Administrative leave shall be with pay for the initial ten (10) working days of the administrative leave period. Every effort shall be made to complete the investigation within the initial ten-day period.*

I certify that a copy of this Notice of Administrative Leave was given to Dr. Amanda Shoemaker on the date indicated above:

\_\_\_\_\_  
Date  
5/28/26  
\_\_\_\_\_  
Date


\_\_\_\_\_  
Employee's Signature  
  
\_\_\_\_\_  
Appointing Authority/Designee's Signature

Copy to Human Resources for employee file

Dr. Shoemaker,

Effective immediately, you are being <sup>placed</sup> ~~placed~~ on  
administrative leave pending the conclusion of my  
investigation.

James Brown



5/28/26

3:13

LTE



James A Brown

2:56 PM

To: Royce, Wendy & 17 more... >

## Dr Shoemaker Status

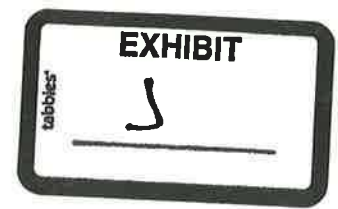
Good afternoon Department Directors,

I wanted to clarify any confusion regarding my prior announcement concerning Dr. Shoemaker's employment status.

Dr. Shoemaker has been placed on administrative leave, which is a paid suspension, pending the completion of the investigation and a final decision regarding her employment status.

If you have any questions or concerns, please do not hesitate to reach out.





## LEVEL 3 NOTICE OF GRIEVANCE

May 1, 2026

### Via Hand Delivery and Email

Linda D. Hays, Acting Chair  
Newton County Board of Commissioners  
1113 Usher Street NW  
Covington, Georgia 30014

**Re:** Level 3 Notice of Grievance – Notice of Dismissal dated April 29, 2026

Dear Acting Chair Hays:

Pursuant to Newton County's grievance procedure, I hereby submit this **Level 3 Notice of Grievance** appealing the **Notice of Dismissal dated April 29, 2026**. This grievance is based on "**Misapplication of County policies in violation of the Employee Handbook.**"

**Grounds for Grievance.** The Notice of Dismissal reflects a misapplication and/or inconsistent application of County policies as set forth in the Newton County Employee Handbook, including the standards, procedures, and safeguards intended to ensure fair and uniform discipline.

**Background.** On April 29, 2026, the County issued a Notice of Dismissal. I dispute the basis for dismissal and the methods used to apply County policy.

**Requested Relief.** I respectfully request that the Chair grant appropriate relief, including:

- Rescission of the April 29, 2026 Notice of Dismissal;
- Reinstatement to my position as Newton County Human Resources Director) with restoration of pay, benefits, leave, and seniority, as applicable;
- Removal or correction of related records in my personnel file; and
- Any other remedy the Chair deems just and consistent with County policy.

**Request for Level 3 Review.** Please advise me in writing of the date, time, and format for the Level 3 hearing/meeting. I also request the opportunity to present you with documentation and witness information consistent with the Employee Handbook.

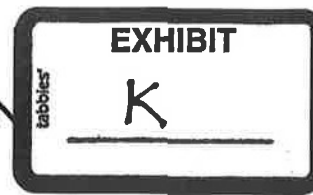
**Reservation of Rights.** This grievance is submitted in good faith and is not intended to waive any rights or remedies available under County policy or applicable law. I reserve the right to supplement this grievance with additional information as it becomes available.

Sincerely,

Amanda Shoemaker



NEWTON COUNTY  
BOARD OF COMMISSIONERS



LINDA D. HAYS  
CHAIRMAN  
STAN EDWARDS  
DISTRICT 1  
DEMOND MASON  
DISTRICT 2  
ANDRE COOPER  
DISTRICT 3  
J.C. HENDERSON  
DISTRICT 4  
LEANNE M. LONG  
DISTRICT 5  
JAMES BROWN  
COUNTY MANAGER

Newton County Board of Commissioners  
1124 Clark Street  
Covington, GA 30014

June 17, 2026

Dear Dr. Amanda Shoemaker,

Newton County intends to dismiss you from employment as Human Resources Director. According to the Employee Handbook, Policy 808, we have arranged to have a pre-dismissal conference on **Thursday, June 25, 2026, at 2:00 p.m.** The conference will be held in a conference room at RL Cousins Community Center, 8134 Geiger St NW, Covington, GA 30014. Your counsel is also invited to attend. You may record this meeting, but we are not permitting the presence of a court reporter.

Under the Employee Handbook, the meeting is intended to be your final opportunity to respond to the reasons for dismissal prior to any discharge. We will discuss my reasons at the conference. Please know that if you decline to attend, I will proceed with dismissing you from employment.

Sincerely,

A handwritten signature in black ink, appearing to be "James Brown", written over a horizontal line.

James Brown  
Acting County Manager  
Newton County Board of Commissioners