



**METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY**

FREDDIE O'CONNELL  
MAYOR

WALLACE W. DIETZ  
DIRECTOR OF LAW

DEPARTMENT OF LAW  
METROPOLITAN COURTHOUSE, SUITE 108  
P.O. BOX 196300  
NASHVILLE, TENNESSEE 37219-6300  
(615) 862-6341 • (615) 862-6352 FAX

TO: MEMBERS, BOARD OF ETHICAL CONDUCT

FROM: WALLACE DIETZ, DIRECTOR OF LAW *WWD*  
NICKI EKE, SENIOR COUNSEL

RE: DEPARTMENT OF LAW REPORT – ETHICS COMPLAINT OF  
JOHN J. GRISWOLD AGAINST COUNCILMEMBER JOY STYLES

DATE: MAY 6, 2024

**I. BACKGROUND AND RECOMMENDATION**

On April 17, 2024, John J. Griswold filed an ethics complaint against Councilmember Joy Styles.<sup>1</sup> The complaint alleges that Councilmember Styles: (a) failed to respond to messages regarding a zoning matter and refused to engage in a professional manner with complainant; (b) failed to file a 2023 Annual Disclosure Statement; and (c) filed a 2022 Annual Disclosure Statement containing misleading information regarding her financial interest in real property located in Davidson County.

For the reasons provided herein, the Department of Law recommends the dismissal of allegations in the complaint concerning Councilmember Styles' unprofessional behavior and failure to respond to messages. The Department of Law further recommends that a hearing be held on allegations in the complaint regarding Councilmember Styles' failure to comply with 2022 and 2023 disclosure statement requirements.

**II. DUTY OF THE DEPARTMENT OF LAW**

The Department of Law is required to evaluate the complaint, applying the law of the standards of conduct to the facts alleged in the complaint, and shall undertake an investigation as may be deemed necessary, to determine if such complaint alleges facts, which if proven true, could be deemed to be a violation of the Standards of Conduct set

<sup>1</sup> The April 17, 2024 complaint of John J. Griswold is attached as Exhibit A.

forth in the Metropolitan Code.<sup>2</sup> Thereafter, the Department of Law will issue a report concluding whether the facts alleged in the complaint, if true, would give rise to a violation of the Standards of Conduct, and recommending either that the complaint be dismissed or a hearing be held on the complaint.<sup>3</sup>

### **III. ALLEGATIONS CONCERNING FAILURE TO RESPOND TO MESSAGES AND UNPROFESSIONAL BEHAVIOR**

The complaint alleges that Councilmember Styles violated the Standards of Conduct by refusing to respond to messages and engage professionally with complainant concerning the zoning of a property located at 5859 Mount View Road. The complaint reflects the following allegations numbered one (1) through three (3):

- (1) Contact Attempts: Councilmember Styles failed to respond to ten emails, nine text messages, and fifteen or more voicemail messages during the period of January 24, 2024 to March 28, 2024.
- (2) “Response from Councilwoman Styles: Despite numerous attempts to reach Councilwoman Styles, I received no response until March 29, 2024. In her response, she displayed unprofessional behavior by stating that she ‘would never rezone ANY property for me,’ questioned my actions in contacting the Vice-Mayor’s office and demanded that I ‘never contact her again.’”
- (3) “Discriminatory Behavior: Councilwoman Styles’ conduct during our communication left me feeling disrespected and discriminated against.”

The Metropolitan Standards of Conduct were enacted in response to state legislation mandating that local governmental entities adopt ethical standards for all officials and employees of such entities.<sup>4</sup> The term “ethical standards” is defined in the state enabling statute as follows:

“Ethical standards” includes rules and regulations regarding limits on, and/or reasonable and systematic disclosure of, gifts or other things of value received by officials and employees that impact or appear to impact their

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<sup>2</sup> Metropolitan Code § 2.222.040(C)(1)(e).

<sup>3</sup> *Id.*

<sup>4</sup> *See* Tenn. Code Ann. § 8-17-103.

discretion, and shall include rules and regulations regarding reasonable and systematic disclosure by officials and employees of their personal interests that impact or appear to impact their discretion. The term “ethical standards” does not include personnel or employment policies or policies or procedures related to operational aspects of governmental entities;...<sup>5</sup>

The Standards of Conduct, when read in conjunction with the state law requiring the adoption of ethical standards, are intended to protect and secure the processes of local government from corruption.<sup>6</sup> The Standards of Conduct and the state enabling statute are aimed at disclosure of interests, financial improprieties, improper influence of officials, and acceptance of benefits by officials.

The alleged lack of response on a zoning matter, unprofessional behavior, and comments attributed to Councilmember Styles do not involve ethical matters as defined or outlined in state law and the Standards of Conduct. The Board of Ethical Conduct is not the proper forum to address the allegations numbered one (1) through three (3) in the complaint concerning an elected official’s unprofessional conduct and lack of response to messages.

#### **IV. ALLEGATIONS CONCERNING NONCOMPLIANCE WITH DISCLOSURE STATEMENT REQUIREMENTS**

The complaint reflects a claim for violation of the Standards of Conduct numbered four (4), which asserts that Councilmember Styles failed to comply with 2022 and 2023 disclosure statement requirements.

The Standards of Conduct specify that an employee shall not fail to file in a timely manner, required disclosure statements:

Employees: ... If disclosure statements are required to be filed by the employee in accordance with this chapter, *shall not fail or refuse to file in a timely manner all disclosure statements and reports*, which statements and reports shall include all material information reasonably required to be included and shall

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<sup>5</sup> Tenn. Code Ann. § 8-17-102(a)(3).

<sup>6</sup> See Tenn. Code. Ann. § 8-17-101: “It is the intent of the general assembly that the integrity of the processes of local government be secured and protected from abuse. The general assembly recognizes that holding public office and public employment is a public trust and that citizens of Tennessee are entitled to an ethical, accountable and incorruptible government.”

not omit any material information reasonably necessary to make such reports complete and meaningful;....<sup>7</sup>

The Standards of Conduct address disclosure requirements that apply to holders of elected offices authorized or created by the Metropolitan Charter:

In an effort to advance the favorable opinion of the public in the integrity of government, the disclosure requirements contained in this section shall apply to the following employees: (1) the mayor; (2) all employees in the mayor's office, including the members of the mayor's cabinet; (3) the metropolitan council office; (4) *the holders of all elected offices authorized or created by the Metropolitan Charter*; (5) all directors, executive directors, assistant directors, and associate directors of metropolitan government agencies, boards, and commissions, but not including Nashville Electric Service, the Metropolitan Nashville Airport Authority, the Metropolitan Development and Housing Agency and the Metropolitan Transit Authority.<sup>8</sup>

The offices of district councilmember and councilmember-at-large are authorized and created by the Metropolitan Charter.<sup>9</sup> Accordingly, the disclosure requirements outlined in section 2.222.030 of the Standards of Conduct apply to all Councilmembers.

Section 2.222.030(B) of the Metropolitan Code requires every Councilmember to file with the Metropolitan Clerk, an annual disclosure statement on or before January 31 of each year. The annual disclosure statement covers requested financial information for the preceding year ending December 31.<sup>10</sup> Information to be disclosed in the annual disclosure statement includes sources of income, financial interests in certain businesses and properties, positions held, and certain debts.<sup>11</sup>

The complaint alleges that Councilmember Styles failed to file a 2023 Annual Disclosure Statement. The Standards of Conduct require Councilmembers to file their

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<sup>7</sup> Metropolitan Code § 2.222.020(r), emphasis added.

<sup>8</sup> Metropolitan Code § 2.222.030(A), emphasis added.

<sup>9</sup> Metropolitan Charter, Article 3.

<sup>10</sup> Metropolitan Code § 2.222.030(B).

<sup>11</sup> *Id.*

2023 Annual Disclosure Statement on or before January 31, 2024.<sup>12</sup> Records from the Metropolitan Clerk reflect that subsequent to the filing of Mr. Griswold's complaint, Councilmember Styles filed her 2023 Annual Disclosure Statement on April 18, 2024.<sup>13</sup>

Councilmember Styles' alleged failure to file a timely 2023 Annual Disclosure Statement, if proven true, could support a finding of violation of the Standards of Conduct.

The Complaint asserts that the 2022 Annual Disclosure Statement filed by Councilmember Styles contains misleading information regarding her financial interest in real property located in Davidson County as follows:

Councilwoman Styles stated in her 2022 Annual Disclosure Statement that neither she nor her spouse had a direct or indirect financial interest in any real property located in Davidson County. However, public records indicate that on February 25<sup>th</sup>, 2022, Councilwoman Styles and Alice Faye Styles Reynolds jointly purchased, with right of survivorship a property at 4058 Arrowleaf Lane, Antioch, TN 37013, which was recorded in a Special Warranty Deed (Book 20220309 Page 0026982).<sup>14</sup>

Records from the Metropolitan Clerk reflect that the 2022 Annual Disclosure Statement submitted by Councilmember Styles on January 23, 2023 reflects the following information:

Do you or your spouse have a direct or indirect financial interest in any real property located in Davidson County, excluding your primary residence?  
No<sup>15</sup>

Metropolitan Clerk records also reflect that the 2023 Annual Disclosure Statement filed by Councilmember Styles on April 18, 2024 contains the following information regarding financial interests in property located in Davidson County:

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<sup>12</sup> Metropolitan Code § 2.222.030(B).

<sup>13</sup> Councilmember Styles' 2023 Annual Disclosure Statement filed with the Metropolitan Clerk on April 18, 2024 is attached as Exhibit B.

<sup>14</sup> See Exhibit A, Complaint of John J. Griswold, page 2.

<sup>15</sup> The 2022 Annual Disclosure Statement of Councilmember Styles, filed electronically with the Metropolitan Clerk, is attached as Exhibit C.

**4. Do you or your spouse have a direct or indirect financial interest in any real property located in Davidson County, excluding your primary residence?** Indirect interests indicate interests of greater than 5% in Real Estate Investment Trusts, other trusts in which you hold a beneficial interest in excess of 5% and other legal entities whose primary business is real estate related.

X\_\_\_\_\_Yes      \_\_\_\_\_No

**If Yes:**

Name and address of the real property: 4058 Arrowleaf Ln, Antioch, TN

The allegation that Councilmember Styles failed to disclose her financial interest in a Davidson County real property in the 2022 Annual Disclosure Statement, if true, could support a finding of violation of the Standards of Conduct.

## **V. CONCLUSION**

It is the opinion of the Department of Law that the allegations numbered one (1) through three (3) in the complaint concerning Councilmember Joy Styles' failure to respond to messages and engage in a professional manner with complainant, if true, would not give rise to a violation of the standards of Conduct. Accordingly, the Department of Law recommends that the Board of Ethical Conduct dismiss allegations one (1) through three (3) in the complaint.

It is the opinion of the Department of Law that the allegation numbered four (4) in the complaint regarding non-compliance with 2022 and 2023 disclosure statement requirements, if true, would give rise to a violation of the Standards of Conduct. Therefore, the Department of Law recommends that the Board of Ethical Conduct hold a hearing on allegations concerning Councilmember Styles' misleading 2022 Annual Disclosure Statement and the failure to file a timely 2023 Annual Disclosure Statement.

# **EXHIBIT A - COMPLAINT OF JOHN J. GRISWOLD**

John J. Griswold  
2908 Woodlawn Drive  
Nashville, TN 37215  
Griswoldtn@aol.com  
615-477-2787

2024 APR 17 PM 4:20  
FILED METROPOLITAN CLERK

April 11, 2024

Mr. Austin Kyle  
Metropolitan Clerk  
1 Public Square, Suite 205  
Nashville TN 37201

Complaint against District 32 Council Member Joy Styles with the Metropolitan Board of Ethical Conduct

Dear Members of the Board,

I am writing to file a formal complaint against Councilwoman Joy Styles of District 32 for ethical misconduct. The details of the complaint are outlined as follows:

**1. Contact Attempts:** Since January 24, 2024, I made several attempts to contact Councilwoman Joy Styles regarding a matter pertaining to zoning for a property located at 5859 Mount View Road. These attempts included:

Ten emails were sent on the following dates: 1/24/24, 1/26/24, 2/2/24, 2/14/24, 2/22/24, 2/23/24, 2/27/24, 3/8/24, 3/14/24, and 3/28/24.

Nine text messages sent on the following dates: 1/26/24, 2/2/24, 2/7/24, 2/14/24, 2/22/24, 2/23/24, and 2/27/24.

Fifteen or more voicemail messages were left.

**2. Response from Councilwoman Styles:** Despite numerous attempts to reach Councilwoman Styles, I received no response until March 29, 2024. In her response, she displayed unprofessional behavior by stating that she "would never rezone ANY property for me," questioned my actions in contacting the Vice-Mayor's office and demanded that I "never contact her again."

**3. Discriminatory Behavior:** Councilwoman Styles' conduct during our communication left me feeling disrespected and discriminated against.

I, John Griswold, a licensed real estate broker in the state of Tennessee, am representing my client in a legitimate business matter. Councilwoman Styles' refusal to engage professionally and her failure to comply with legal requirements severely hinder my ability to serve my client's interests and my ability to earn an income.



**4. Non-compliance with Disclosure Statement Requirement:** Upon inquiry to the Metropolitan Government of Nashville & Davidson County clerk’s office, it was revealed that Councilwoman Joy Styles failed to file her 2023 Annual Disclosure Statement, which is required to be filed on or before January 31, 2024.

Furthermore, upon further investigation, it has come to my attention that Councilwoman Styles’ 2022 Annual Disclosure Statement contains misleading information, including a false statement regarding her financial interest in real property located in Davidson County.


For example, Councilwoman Styles stated in her 2022 Annual Disclosure Statement that neither she nor her spouse had a direct or indirect financial interest in any real property located in Davidson County. However, public records indicate that on February 25th, 2022, Councilwoman Styles and Alice Faye Styles Reynolds jointly purchased, with right of survivorship a property at 4058 Arrowleaf Lane, Antioch, TN 37013, which was recorded in a Special Warranty Deed (Book 20220309 Page 0026982).

Such discrepancies raise serious concerns about Councilwoman Styles' integrity and adherence to ethical standards. It is imperative that elected officials uphold the trust placed in them by the constituents they serve and comply with all legal and ethical obligations.

Therefore, I respectfully urge the Metropolitan Nashville Council Board of Conduct to thoroughly investigate the conduct of Councilwoman Joy Styles and take appropriate action to address these serious allegations.

Thank you for your attention to this matter. I remain hopeful that swift and decisive action will be taken to uphold the integrity of our local government and restore the trust of the community.


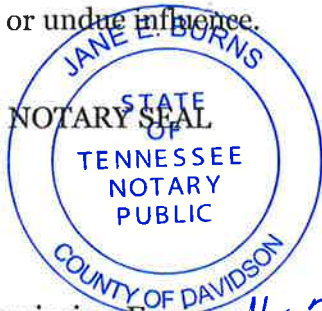
Sincerely,



John J. Griswold

STATE OF TENNESSEE        )  
                                              )  
COUNTY OF DAVIDSON        )

On this 11 day of April, in the year of 2024, before me, **Jane E. Burns**, personally appeared John Junius Griswold, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to this instrument and acknowledged that he/she executed it. I declare under penalty of perjury that the person whose name is subscribed to this instrument appears to be of sound mind and under no duress, fraud, or undue influence.



Signature of Notary Public

Commission Expires: 11-2-2026

**EXHIBIT B**

**COUNCILMEMBER STYLES'**

**2023 ANNUAL DISCLOSURE STATEMENT**

**FILED WITH THE METROPOLITAN CLERK**

ANNUAL DISCLOSURE STATEMENT

NAME: Joy Styles POSITION/OFFICE: Councilwoman District 32

This Annual Disclosure Statement is submitted in compliance with Section 2.222.030 of the Metropolitan Code for the year ending December 31, 2023. Use additional sheets of paper as necessary.

1. List all sources of your income for the preceding calendar year. Gifts from family members and relatives by blood or marriage need not be disclosed.

Sources: United Healthcare, Metropolitan Nashville Government

2. To the best of your knowledge, list all sources of income for your spouse for the preceding year. Gifts from family members and relatives by blood or marriage need not be disclosed.

Sources: N/A

3. Do you or your spouse presently have a financial interest of at least 5% (five percent) of any business with operations, offices, or interests in the Metropolitan Nashville area?

Yes X No

If Yes:

Table header: Yourself or Spouse, Business name and address, Percent of the interest, if known

4. Do you or your spouse have a direct or indirect financial interest in any real property located in Davidson County, excluding your primary residence? Indirect interests indicate interests of greater than 5% in Real Estate Investment Trusts, other trusts in which you hold a beneficial interest in excess of 5% and other legal entities whose primary business is real estate related.

X Yes No

If Yes:

Name and address of the real property: 4058 Arrowleaf Ln, Antioch, TN

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**5. Do you or your spouse hold any paid or unpaid position with any for-profit entity, non-profit entity, labor group, or educational or other institution which you have not already listed on this form:**

Yes       No

If Yes:

Person	Position	Entity
__Joy Styles	Executive Director	Southeast Community Ventures, Salvation Army Advisory Board

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**6. Do you or your spouse have a financial interest in, or are you or a family member a party to, any litigation involving the Metropolitan Government?**

Yes       No

If Yes, describe each: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**7. Do you or your spouse have any\* debts, guarantees, or endorsements of debts aggregating over \$5,000 owed to any one creditor?**

\*Excluding liabilities owed to a family member or relative by blood or marriage, and excluding loans from established financial institutions made in the ordinary course of business on usual and customary terms.

Yes       No

If Yes, describe each: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**8. Do you or your spouse have any debts in excess of \$5,000 which are secured by a guarantee or collateral of any individual other than a family member or a relative by blood or marriage?**

Yes       No

If Yes, describe each: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ATTESTATION**

Under penalty of perjury, the information contained herein is true to the best of my information and belief.



\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

4/17/23

**EXHIBIT C**

**COUNCILMEMBER STYLES'**

**2022 ANNUAL DISCLOSURE STATEMENT**

**FILED WITH THE METROPOLITAN CLERK**

## Kyle, Austin (Metro Clerk)

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**From:** Nashville.gov <donotreply@nashville.gov>  
**Sent:** Monday, January 23, 2023 8:53 PM  
**To:** Scruggs, Sapriya (Metro Clerk); Kyle, Austin (Metro Clerk); Reed, Shawn (Metro Clerk)  
**Subject:** Webform submission from: Annual Disclosure Statement

**Attention:** This email originated from a source external to Metro Government. Please exercise caution when opening any attachments or links from external sources.

Submitted on Mon, 01/23/2023 - 8:52 PM

Submitted by: Anonymous

Submitted values are:

**Submitted for the year ending December 31:**  
2022

**Name:**  
Joy Styles

**Position/Office:**  
Councilwoman

**List all sources of your income for the preceding calendar year:**  
United Healthcare, Metropolitan Government

**To the best of your knowledge, list all sources of income for your spouse for the preceding year:**  
N/A

**Do you or your spouse presently have a financial interest of at least 5% (five percent) of any business with operations, offices, or interests in the Metropolitan Nashville area?**  
No

**Do you or your spouse have a direct or indirect financial interest in any real property located in Davidson County, excluding your primary residence?**  
No

**Do you or your spouse hold any paid or unpaid position with any for-profit entity, non-profit entity, labor group, or educational or other institution which you have not already listed on this form?**  
No

**Do you or your spouse have a financial interest in, or are you or a family member a party to, any litigation involving the Metropolitan Government?**  
No

**Do you or your spouse have any\* debts, guarantees, or endorsements of debts aggregating over \$5,000 owed to any one creditor?**  
No

**Do you or your spouse have any debts in excess of \$5,000 which are secured by a guarantee or collateral of any individual other than a family member or a relative by blood or marriage?**

No

**Email address:**

[joystylesdsm@gmail.com](mailto:joystylesdsm@gmail.com)

## **Attestation**

Under penalty of perjury, the information contained herein is true to the best of my information and belief.

**Electronic Signature:**

Joy Styles

**Date:**

01/23/2023