

IN THE STATE COURT OF EFFINGHAM COUNTY
STATE OF GEORGIA

FILED IN OFFICE
CLERK OF STATE COURT
EFFINGHAM COUNTY, GEORGIA
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Jason E. Bragg, Clerk
Effingham County, Georgia

SHANE RAMSEY,

PLAINTIFF

VS.

CIVIL ACTION NO. _____

YANCY FORD AND

JAMIE WELLS.

DEFENDANTS.

COMPLAINT AND JURY DEMAND

COMES NOW, Shane Ramsey and makes his complaint against Defendants Yancy Ford and Jamie Wells.

PARTIES JURISDICTION AND VENUE

1.

Plaintiff is a citizen of the state of Georgia who was formerly employed by the Effingham County School District (ECSD).

2.

Defendant Yancy Ford ("Ford") is an individual residing at 3675 Midland Road, Guyton, Effingham County, Georgia. Service of process may be made upon Ford at his residence or his place of employment.

3.

Defendant Jamie Wells ("Wells") is an individual residing at 103 Gnann Way Rincon, Effingham County, Georgia. Service of process may be made upon Wells at his

residence.

4.

Jurisdiction and venue are proper in Effingham County, Georgia, because both Defendants reside in the County.

Factual Background

5.

Ford is the Superintendent of the Effingham County School District. He is heavily involved and supportive of Effingham County High School sports, especially football and baseball as he is an alum and former player.

6.

Wells is a close friend of Yancy Ford, who like Ford, shares the affinity for Effingham County High School sports.

7.

Ramsey was a baseball coach at Effingham County High School. Due to retaliation from his employer and the creation and fostering of a hostile work environment, he was left with no option but to resign.

8.

Ramsey ultimately was offered and accepted the position of head baseball coach at Rome High School, in Rome, Georgia. Upon acceptance of the position Ford threatened to contact Ramsey's new employer in efforts to sabotage his new position.

9.

Ramsey uprooted his family and moved away from Effingham

County.

10.

Ramsey began to get settled in and was excited about starting a new year with a competent and qualified athletic director and successful athletic program which operated without undue influence from the administration or superintendent. In fact, the amount of interference by the superintendent into the sports programs at Effingham County High School was unheard of by Ramsey.

11.

On July 11, 2023, not long after Ford had made the threat to Ramsey to contact his new employer, Wells at the direction of Ford, contacted Ramsey's athletic director on his unlisted personal cell phone. Wells did not know the athletic director at Rome High School at any time prior to the call.

12.

In that call, Wells made defamatory, and derogatory comments about Ramsey, intimating that he was incompetent and unqualified to coach.

13.

These defamatory statements were made with the intent to sabotage and jeopardize Ramsey's employment with his new employer.

14.

Additionally, Wells called another employee at Rome High School and made disparaging and derogatory comments about Ramsey with the intent to sabotage and jeopardize Ramsey's

employment with his new employer.

15.

Defendants' actions were committed with the specific intent to cause harm to Plaintiff and show willful misconduct, malice, wantonness or that entire want of care, which would raise the presumption of conscious indifference to consequences entitling Plaintiff to an award of punitive damages.

COUNT ONE

TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS

(Defendants Ford and Wells)

16.

The preceding paragraphs are incorporated herein as if fully restated.

17.

Plaintiff had a valid contractual relationship with his new employer which Defendants attempted to terminate via egregious and malicious conduct.

18.

Defendants Ford and Wells, who are not parties to Plaintiff's contract, attempted to induce his employer to sever their contract and not continue their business relationship with Plaintiff.

19.

In doing so, Defendants Ford and Wells acted improperly and without privilege, and purposely and maliciously with the intent to injure.

20.

As a direct and proximate result of those Defendants' actions, Plaintiff have suffered financial injury in an amount to be proven at trial.

21.

In addition, Defendants Ford and Wells have acted in bad faith and have caused Plaintiff unnecessary trouble and expense. Accordingly, pursuant to O.C.G.A. § 13-6-11, Plaintiff is entitled to recovery of their litigation expenses, including but not limited to their reasonable attorneys' fees.

22.

Those Defendants' actions show willful misconduct, malice, fraud, wantonness, oppression, or that entire want of care, which would raise the presumption of conscious indifference to consequences, entitling Plaintiffs to an award of punitive damages.

COUNT TWO

DEFAMATION/SLANDER

23.

The preceding paragraphs are incorporated herein as fully restated.

24.

Defendants Ford and Wells made numerous oral statements about Plaintiff to other individuals that were false, defamatory, and malicious in nature.

25.

Those false, defamatory, and malicious statements included, among others, that Plaintiff would destroy their program like he did at Effingham and that he was incompetent

and not a qualified coach.

26.

Those statements are of the kind tending to injure the reputation of Plaintiff and expose Plaintiff to public hatred, contempt or ridicule. In addition, the statements were made as to Plaintiff in reference to his livelihood and profession, and were calculated to injure.

27.

Defendants made those statements with a specific intent to benefit themselves and harm Plaintiff.

28.

As a result of Defendants' statements, Plaintiff has suffered actual injury and special harm in the form of damage to his reputation, and other injuries.

29.

Defendants have acted in bad faith and have caused Plaintiff unnecessary trouble and expense. Accordingly, pursuant to O.C.G.A. §13-6-11, Plaintiff is entitled to recovery of his litigation expenses, including but not limited to his reasonable attorney fees.

30.

Defendants actions show willful misconduct, malice, fraud, wantonness, oppression, or that entire want of care, which would raise the presumption of conscious indifference to consequences, entitling Plaintiffs to an award of punitive damages.

COUNT THREE
DEFAMATION/LIBEL

31.

The preceding paragraphs are incorporated herein as fully restated.

32.

Defendants made numerous false, defamatory and malicious statements about Plaintiff.

33.

Those false, defamatory and malicious statements were expressed in writing via email and text messages.

34.

Those statements are of the kind tending to injure the reputation of Plaintiff and expose Plaintiff to public hatred, contempt or ridicule.

35.

Defendants republished certain of the above-referenced defamatory statements to third parties, Amie Dickerson and Jake Darling among others.

36.

As a result of Defendants' statements, Plaintiff has suffered actual injury and special harm in the form of harm to his reputation, actual loss and other injuries.

37.

The Defendants have acted in bad faith and have caused Plaintiff unnecessary trouble and expense. Accordingly, pursuant to O.C.G.A. §13-6-11, Plaintiff is entitled to recovery of his

litigation expenses, including but not limited to his reasonable attorney fees.

38.

Defendants actions show willful misconduct, malice, fraud, wantonness, oppression, or that entire want of care, which would raise the presumption of conscious indifference to consequences, entitling Plaintiffs to an award of punitive damages.

COUNT FOUR
CIVIL CONSPIRACY/AIDING AND ABETTING

39.

The preceding paragraphs are incorporated herein as fully restated.

40.

Defendants acted in concert to damage Plaintiff.

41.

Acting together, Defendants engaged in the tortious conduct described in the foregoing Counts and alleged herein in order to damage Plaintiff.

42.

Each Defendant aided and abetted the acts of the other Defendant.

43.

As a direct result of Defendants' conspiracy and aiding and abetting, Plaintiff has suffered damages in an amount to be proven at trial.

44.

The Defendants have acted in bad faith and have caused Plaintiff unnecessary trouble

and expense. Accordingly, pursuant to O.C.G.A. §13-6-11, Plaintiff is entitled to recovery of his litigation expenses, including but not limited to his reasonable attorney fees.

45.

Defendants actions show willful misconduct, malice, fraud, wantonness, oppression, or that entire want of care, which would raise the presumption of conscious indifference to consequences, entitling Plaintiffs to an award of punitive damages.

WHEREFORE, having set forth their complaint, Plaintiff respectfully pray that this Court:

1. Cause summons and process to issue as required by law;
2. Empanel a jury to try all questions of fact;
3. Award Plaintiff his damages as proven at trial;
4. Award Plaintiff punitive damages, exemplary damages, and any enhanced damages allowed by law or authorized by statute, rule or regulation arising of Defendants' misconduct, torts and breaches;
5. Award Plaintiff attorney's fees and costs for Defendants' bad faith, stubborn litigiousness and causation of unnecessary trouble and expense pursuant to O.C.G.A. §13-6-11;
6. Assess all cost against Defendants; and
7. Award such further and other relief as this Court deems just and proper.

Respectfully submitted,

/s/ Joseph B. Ervin

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