

**IN THE JUVENILE COURT  
OF HAMILTON COUNTY, TENNESSEE**

**STATE OF TENNESSEE**

**vs.**

**ANDRE D. MONTGOMERY,  
KARL WILLIAMS, and  
ALLARD J. NAYADLEY**

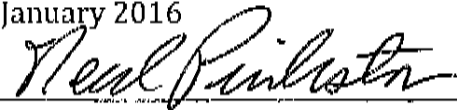
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**COMPLAINT REGARDING VIOLATIONS OF  
TENNESSEE CODE ANNOTATED 37-1-403 and  
TENNESSEE CODE ANNOTATED 37-1-605**

Comes now the State of Tennessee, by and through the District Attorney General's Office, and report to this Honorable Court an investigation by the Hamilton County Sheriff's Office and the Hamilton County District Attorney's Office has revealed Andre D. Montgomery (acting in his capacity as Ooltewah High School Head Basketball Coach), Karl Williams (acting in his capacity as Ooltewah High School Assistant Basketball Coach) and Allard J. Nayadley (acting in his capacity as Assistant Principal and Athletic Director of Ooltewah High School) have violated Tennessee Code Annotated 37-1-403 and/or Tennessee Code Annotated 37-1-605 which involve mandatory reporting of child abuse and/or suspected child sexual abuse or child sexual abuse. (See attached affidavits) The State of Tennessee would ask this Honorable Court issue process upon Andre D. Montgomery, Karl

Williams and Allard J. Nayadley and that they be brought before this Honorable Court to answer violations of Tennessee Code Annotated 37-1-403 and Tennessee Code Annotated 37-1-605.

Respectfully submitted this the 14<sup>th</sup> day of January 2016



Neal Pinkston  
District Attorney General  
600 Market Street, Suite 310  
423-209-7400

### AFFIDAVIT OF MICKEY ROUNTREE

1. My name is Mickey Rountree and I am a detective for the Hamilton County, Tennessee, Sheriff's Office. I have been employed with the Hamilton County Sheriff's Office for more than twelve years and I am currently assigned to investigate violent crimes and sex crimes.
2. After District Attorney General Neal Pinkston was briefed on an investigation by the Gatlinburg Police Department, I was assigned to investigate allegations of assaultive behavior among players for the Ooltewah High School basketball team spanning the months of October, November and December 2015. I was assigned to investigate this matter along with Lisa Mathis, an investigator for the District Attorney's Office of the 11<sup>th</sup> Judicial District of Tennessee. Our investigation began on Monday January 4, 2016.
3. The investigation has included interviews with Ooltewah High School basketball players, some of the Ooltewah High School basketball coaching staff and Ooltewah High School administrators. I have also reviewed documents provided by the Department of Children Services which include incident reports filed by the Gatlinburg Police Department.
4. The investigation revealed the Ooltewah High School basketball team traveled to Gatlinburg in December and stayed at a cabin from approximately December 19-23, 2015. The purpose of the trip was to perform in a basketball Tournament.

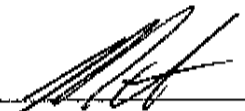
5. During the team's stay in Gatlinburg, four freshmen basketball players were subjected to assaultive behavior including but not limited to being struck with pool cues and also these four freshman basketball players were subjected to apparent sexual assault. One player required emergency surgery due to the injuries he received while staying at the cabin.

6. That the Ooltewah High School Basketball Head Coach, the Ooltewah High School Basketball Assistant Coach and the Ooltewah High School Assistant Principal and Athletic Director after being made aware of these allegations did not notify the Department of Children's Services or Sheriff of the County where the children reside or the Chief of Police of the municipality where the children reside or the Juvenile Court Judge having jurisdiction over the children.

7. Tennessee Code Annotated 37-1-403 and Tennessee Code Annotated 37-1-605 require mandatory reports of child abuse, apparent child sexual abuse or child sexual abuse.

8. I was informed by the Department of Children's Services that no one within the Ooltewah High School administration, coaching staff or other staff ever notified the Department of Children's Services of this incident nor did anyone with the Hamilton County Department of Education.

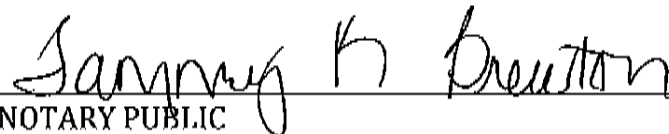
ALL OF THIS INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

 #2384

MICKEY ROUNTREE  
DETECTIVE  
Hamilton County Sheriff's Office  
600 Market Street, Courts Building  
Chattanooga, TN 37402  
423-209-7000



Sworn and subscribed before me this the 14th day of January, 2016

  
NOTARY PUBLIC

My commission expires: 2/10/2019

**AFFIDAVIT OF LISA MATHIS**

1. My name is Lisa Mathis and I am a criminal investigator for the District Attorney General's Office of the 11<sup>th</sup> Judicial District Chattanooga, Tennessee. I have been employed with the District Attorney General's Office for almost one year and have sixteen years of prior law enforcement experience with the Catoosa County Sheriff's Office, including assignment to investigations involving child abuse and child sexual abuse.
2. After District Attorney General Neal Pinkston was briefed on an investigation by the Gatlinburg Police Department, I was assigned to investigate allegations of assaultive behavior among players for the Ooltewah High School basketball team spanning the months of October, November and December 2015. I was assigned to investigate this matter along with Hamilton County Sheriff's Office Detective Micky Rountree. Our investigation began on Monday January 4, 2016.
3. The investigation has included interviews with Ooltewah High School basketball players, some of the Ooltewah High School basketball coaching staff and Ooltewah High School administrators. I have also reviewed documents provided by the Department of Children Services which include incident reports filed by the Gatlinburg Police Department.
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8. I was informed by the Department of Children's Services that no one within the Ooltewah High School administration, coaching staff or other staff ever notified the Department of Children's Services of this incident nor did anyone with the Hamilton County Department of Education.

ALL OF THIS INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

*Lisa Mathis*

LISA MATHIS  
CRIMINAL INVESTIGATOR  
Hamilton County District Attorney General's Office  
600 Market Street, Suite 310  
Chattanooga, TN 37402  
423-209-7400



Sworn and subscribed before me this the 14th day of January, 2016

*Tammy K Brewton*

NOTARY PUBLIC

My commission expires: 2/10/2019



IN THE JUVENILE COURT  
OF HAMILTON COUNTY, TENNESSEE

STATE OF TENNESSEE

vs.

ANDRE D. MONTGOMERY,  
KARL WILLIAMS, and  
ALLARD J. NAYADLEY

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STATE OF TENNESSEE'S MOTION TO ALLOW PUBLIC ACCESS  
AND INSPECTION OF RECORDS INVOLVING VIOLATIONS  
OF TENNESSEE CODE ANNOTATED 37-1-403 AND TENNESSEE CODE  
ANNOTATED 37-1-605

Comes now the State of Tennessee, by and through the District Attorney  
General's Office, and pursuant to Tennessee Code Annotated 37-1-153 (a)(5)  
ask this Honorable Court for an order allowing public access and inspection  
of records involving the above-captioned case due to the legitimate and  
overwhelming public interest that exists in this matter.

Respectfully submitted this the 14<sup>th</sup> day of January, 2016.



Neal Pinkston  
District Attorney General  
600 Market Street, Suite 310  
Chattanooga, TN 37402  
423-209-7400