

**STATE OF MICHIGAN
IN THE 22nd CIRCUIT COURT
FOR THE COUNTY OF WASHTENAW**

CHAMANE WILLIAMS,

Plaintiff,

Case No. 26- -CZ

Hon.

v.

WASHTENAW COUNTY SHERIFF
ALYSHIA DYER, in her official capacity; and
WASHTENAW COUNTY, a municipal
corporation,

Defendants.

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COMPLAINT

There is no other pending or resolved civil action
arising out of the transaction or occurrence alleged
in the complaint.

/s/ Adam M. Dreher
Adam M. Dreher (P79246)
NACHTLAW P.C.

NOW COMES Plaintiff Chamane Williams by and through her counsel, NACHTLAW,
P.C., and states as follows:

INTRODUCTION

1. Defendants unlawfully terminated Plaintiff in violation of Michigan's Whistleblower Protection Act (hereinafter "WPA"), MCL 15.362, *et seq.*, and in violation of Const. 1963 art I, § 17. Defendants forced Plaintiff to break the law and lie about the qualifications of the people the sheriff wanted to hire. Because she would not do it, and told others about how *they* were doing it, they fired her.

2. Plaintiff has served the county since 2012 working her way up to the position of Human Resources Specialist within the Sheriff's Department. She served in that position from February 12, 2023, until March 23, 2026, when she was unlawfully terminated.

3. A new sheriff, who began serving January 1, 2025, terminated Plaintiff because Plaintiff communicated issues related to the new sheriff's hiring policies to a public entity. These new hiring policies implemented by the sheriff contravened state law.

4. The Michigan Commission on Law Enforcement Standards Act, MCL 28.601 *et seq.*, subjects all law enforcement officers to licensing requirements before performing law enforcement duties in the State of Michigan. An individual remains unlicensed to perform law enforcement duties *until* the employing law enforcement agency attests in writing that the individual satisfies the qualifications set by the Commission.

5. For multiple individuals employed by the Washtenaw County Sheriff, Plaintiff was instructed to attest to qualifications that were not present. When Plaintiff raised her concerns, Plaintiff had to endure retaliatory harassment from the Human Resources manager, also newly hired by the sheriff, before being terminated pretextually in violation of due process.

6. Defendants employed a procedure to terminate Plaintiff's public employment violating the due process clause of the Michigan Constitution. The process due to Plaintiff before

termination included notice, representation by an attorney, opportunity to be heard, an impartial decision-maker, and a post-termination review. She did not receive any of these protections.

7. Her termination was effective March 23, 2026.

PARTIES, JURISDICTION, AND VENUE

8. Plaintiff is a 41-year-old individual, residing in Washtenaw County. Plaintiff is an “employee” as that term is defined in MCL § 15.361(a).

9. Defendant Washtenaw County Sheriff Alyshia Dyer (“Defendant Sheriff”), is the elected sheriff of Washtenaw County, first elected in November 2024 to begin service January 1, 2025. Defendant Sheriff is an “employer” as defined in MCL § 15.361(b).

10. Defendant Washtenaw County (“Defendant County”), is a political subdivision of the State of Michigan. Defendant County is an “employer” as defined in MCL § 15.361(b).

11. The events giving rise to this cause of action occurred in Washtenaw County, Michigan.

12. The amount in controversy exceeds \$25,000, exclusive of interest, costs, and attorney fees. *See* MCL § 600.605.

13. Venue is proper under MCL § 15.363(2), as the violation occurred in Washtenaw County, Plaintiff resides in Washtenaw County, and Defendants’ principal place of business are in Washtenaw County.

GENERAL ALLEGATIONS

14. Plaintiff incorporates by reference herein the allegations contained in the foregoing paragraphs.

15. Plaintiff began working as a part-time, temporary, Youth Relief Worker on July 30, 2012 for Washtenaw County. She followed in her father’s footsteps, who also has had long service ties to the Washtenaw County Sheriff’s Office. Plaintiff received her first raise in September 2012.

Plaintiff Answered the Call to Serve within the Washtenaw County Sheriff’s Office

16. In December of that same year, Plaintiff was hired full-time to serve as a Community Services Officer within the Washtenaw County Jail. At that point, Plaintiff became a member of the Police Officers Association of Michigan (“Union”). She earned annual merit raises each year.

17. In addition to her normal duties, Plaintiff was sworn as a “Special Deputy Sheriff” on December 21, 2016.

18. In July 2020, Plaintiff was transferred from the jail to the records department. This was a lateral transfer and there was no change to her title or pay.

19. Plaintiff received commendations from the Sheriff in 2018, 2020, and 2023.

20. On February 12, 2023, Plaintiff was promoted to the position of Human Resources Specialist. This position change included an increased grade and increased step. The Personnel Action Record noted the reason for the change to be “Promotion Within Department.”

21. The promotion changed her union status. Plaintiff was then “8100-Sheriff Non Union.”

22. The Human Resources Specialist position within the Sheriff’s Department required Plaintiff to complete additional training in all the statutory requirements required to employ law enforcement officers. Her additional training did not finish until December 2023.

The Newly Elected Sheriff Changes Policy in Violation of State Law

23. Defendant Sheriff was elected to serve as Washtenaw County’s Sheriff in November 2024. Her service began January 1, 2025.

24. Soon after she began, Defendant Sheriff hired Jeremiah Richardson (“Richardson”) to serve as the newly created Human Resources Manager for the Washtenaw County Sheriff’s

Office. Defendant Sheriff and Richardson served as patrol partners prior to Richardson's resignation from the Sheriff's Office on December 10, 2022.

25. Richardson previously resigned while under investigation. The previous Undersheriff noted, "The likely outcome [of the investigation] would have resulted in terminating his employment as a matter of progressive corrective disciplinary action."

26. On February 1, 2025, Defendant Sheriff issued a "Letter of Commendation – Superior Performance," for the entire Human Resources Team of the Washtenaw County Sheriff's Office. Defendant Sheriff within that commendation wrote, "at my direction, [the Washtenaw County Sheriff's Office] has transitioned to a new, expedited, hiring process."

27. The new hiring process announced in the February commendation required Plaintiff to process applicants that did not satisfy the requirements for employment under the Michigan Commission of Law Enforcement Standards (MCOLES). Plaintiff, along with other coworkers within the Human Resources Department, raised concerns to their chain of command, including the new Undersheriff, about attempting to hire individuals who did not satisfy the requirements, including satisfactory background as required under MCL § 28.609(2) and MCOLES Licensing Standards for Michigan Law Enforcement Officers.

28. Qualifications established by the Commission are for both road deputies and corrections officers.

29. On April 9, 2025, Richardson then announced a new policy restricting background related documents for new hires to "Director Campbell, the Undersheriff, Sheriff, background personnel, Richardson and any other personnel designated by the Undersheriff or Sheriff." Plaintiff was unable to access necessary background information although she is required to attest that each new hire satisfied the qualification standards of MCOLES.

30. Plaintiff informed Richardson that she was unable to confirm or deny something that she cannot see. She was instructed to complete the attestation form submitted to MCOLES despite her inability to confirm the information on it because her attestation was only “clerical.”

31. Plaintiff’s supervision mandated several applicants to continue through the hiring process despite her inability to attest to their qualifications. When Plaintiff continued to report her concerns, Plaintiff was subjected to retaliatory harassment by Richardson.

32. Richardson continued the harassment seeking compliance to his directives related to the attestations of unqualified candidates as road deputies and corrections officers.

Plaintiff Shared Her Concerns With Her Entire Chain of Command

33. Plaintiff took her concerns to the director of operations, Crystal Campbell, in March of 2025. When her concerns were not addressed, Plaintiff then took her concerns to Undersheriff Matthew Harshberger (“Undersheriff”). Plaintiff met with the Undersheriff twice in May 2025.

34. During one of the meetings, the Undersheriff informed Plaintiff that the changes to the hiring process were more efficient. The Undersheriff told the entire HR Department that there was now a different hiring philosophy. He informed the group, “You’re going to see some candidates that come in that we’re probably going to be taking some chances on, because we think it is the right thing to do.”

35. The Undersheriff instructed, “At the end of the day, it is our decision.” The candidates were going to come in because “we believe they can do the job, their hearts are in the right place, we think we’re doing it for the right reasons. We’re not always going to hit the nail on the head and be accurate with every one . . . but giving second chances maybe even third chances to people who maybe we think deserve that, well okay, we’re going to try it and see how it goes.”

36. The Undersheriff confirmed during the meeting that it was him and Defendant Sheriff who would get beat over the head with the hiring decisions, not the individual employees who are “just doing their jobs.”

37. Plaintiff then reported her concerns to Defendant County in June 2025.

The Retaliatory Harassment Against Plaintiff Continued

38. Plaintiff’s concerns about her treatment, and the underlying violations, were not addressed by Defendant County directly.

39. Instead, Plaintiff continued to report her concerns through her own chain of command and continued to experience retaliatory harassment from her supervision. The harassment included lack of pleasantries, pervasive micro-management, and hostile corrections to work performed correctly.

40. By way of example, in July-August 2025, a new applicant for a road patrol position with the Sheriff’s Office had difficulty meeting MCOLES’s requirements.

41. One of the first requirements for any new licensee is to complete a “Personal History Statement and Affidavit,” (“PHS”) and submit it to the employing agency. The PHS form provides the employing agency with the required information to conduct a background check.

42. At the Washtenaw County Sheriff’s Office, the process for hiring new employees is tracked on an excel-like “Smart Sheet.” This sheet tracks the process for each applicant, and which employee has completed each step in the application process.

43. Despite the Smart Sheet tracking each stage in the process, Richardson chastised Plaintiff for not completing that initial step. Within the sheet, Plaintiff noted the issue was that the applicant simply was unable to complete the PHS. However, Richardson instructed Plaintiff to give the applicant a conditional job offer and be moved forward with the hiring process.

44. Some other more significant issues with the hiring process would require “Command Approval” before continuing. In September, Plaintiff noticed that Richardson began modifying the smart sheet to remove issues Plaintiff forwarded to command on more serious issues.

45. When issues were forwarded to command, often notes would be attached to the smart sheet to inform command with the issue. Richardson would remove the forwarded message or simply approve the candidate himself, despite the issue needing “Command Approval.”

46. Plaintiff continued to report on her concerns about the hostile work environment with both Defendant Sheriff and Defendant County.

Defendant Sheriff Suddenly Initiates Termination Proceedings

47. On October 28, 2025, Plaintiff received an order that she was being placed on administrative leave with pay. The one-page order was signed by the Undersheriff and stated that Plaintiff would be on administrative leave “until a determination is rendered regarding allegations of misconduct.” The order additionally required Plaintiff have no contact “with other WCSO staff or enter any WCSO facility without . . . approval.”

48. The order did not provide notice of what the allegations were.

49. The following week, Plaintiff was instructed to report for an interview with Captain Krings. Captain Krings is the Captain of Police Services with the Washtenaw County Sheriff’s Office.

50. Plaintiff was interviewed on November 10, 2025. At the interview, Plaintiff was not provided with a notice of charges. Plaintiff requested an attorney, which was rejected. She was told she was “not a member of the union.”

51. Plaintiff was informed that a fellow employee was also on administrative leave. Captain Krings did not ask about the hostile work environment, or any sort of personnel questions. Instead, the interview focused on Plaintiff's conduct.

52. Plaintiff did not hear from Defendant Sheriff's office after the interview until February 2026, when she was instructed to come retrieve her notice of charges. On February 25, 2026, Plaintiff received the notice and was provided an opportunity to provide a "written request for a hearing before the Sheriff" by March 4, 2026. Again, Plaintiff requested an attorney and was refused.

53. The notice outlined six separate "Class 1" charges. Four of the charges alleged that Plaintiff did not submit paperwork to MCOLES, which caused law enforcement officers to perform duties while unlicensed. Two of the charges alleged Plaintiff was "untruthful" when asked about a smart sheet entry from 2023 and when Richardson instructed her to classify a new hire as "deputy recruit" when the individual was unqualified in June 2025.

54. Plaintiff, through counsel, submitted a letter to the Undersheriff outlining her position, echoing once more that Plaintiff was a whistleblower and refuting some of the factual claims within the notice of charges. The letter to the Undersheriff asked for it to be forwarded to Defendant County Corporation Counsel.

55. Defendant Sheriff, bypassing Plaintiff's counsel, informed Plaintiff that a hearing on the allegations would occur on March 12, 2026.

56. When Plaintiff arrived, she was again refused an attorney. Only the Undersheriff and another HR employee were present and lasted approximately 60 seconds. The Undersheriff told Plaintiff a decision would be forthcoming.

57. On March 19, 2026, Plaintiff was called to return and was provided with a Notice of Disciplinary Action finding two of the six charges previously alleged to have occurred. The violations related to the 2023 personnel action and Plaintiff's "truthfulness" of that 2023 hire. Within the commentary, Defendant Sheriff noted, "Progressive discipline short of termination would not sufficiently address the severity of these violations or restore confidence in your ability to perform the essential job functions of Human Resource Specialist."

58. Plaintiff's termination became effective on March 23, 2026. Her thirteen-year career ended following this one disciplinary action.

59. There was no appeal process.

Defendant County's Actions

60. Plaintiff first reported her concerns to Defendant County's HR Department in June 2025. Defendant County never contacted Plaintiff about her concerns.

61. Instead, Plaintiff received a message from Defendant County, through Corporation Counsel, on December 1, 2025, while Plaintiff was already on administrative leave. The email, sent to Plaintiff's personal email, read: "As a result of your report, the County hired an external law firm, Dykema, to investigate WCSO hiring practices and workplace culture. Over the course of several months, the Dykema team spent time reviewing County and WCSO policies, reviewing emails, and other documents."

62. Plaintiff was never asked to take part in Defendant County's investigation of her report.

63. The email continued with the conclusion that the outside firm found, (1) WCSO had not violated any state requirements, laws, or county policies for hiring; (2) the Sheriff has the

authority to modify hiring standards; and (3) Richardson did not create a hostile work environment as defined under federal or state law.

64. The email asked Plaintiff to consider the email to be closure of the matter and confirmed that reports of retaliation for reporting to Defendant County should be forwarded to her office. At the time of the email, Plaintiff was already ordered to be on Administrative Leave.

65. Despite Defendant County's email on December 1, 2025, the Washtenaw County Board of Commissioners passed County Resolution 25-249 seeking to transfer Plaintiff's position from Defendant Sheriff to Defendant County two days later. The Resolution noted, "widespread reports of misconduct and detrimental internal operations within the Sheriff's Office's internal HR function, including but not limited to allegations of intimidation, punitive retaliation, and a systemic breakdown of employee confidence."

66. On December 23, 2025, Defendant Sheriff filed a verified complaint with this Court seeking injunctive relief to prevent Plaintiff's position from being moved to Defendant County.

67. Within the verified complaint, Defendant Sheriff alleged Plaintiff's role *always* required appointment as a Special Deputy Sheriff, by the Sheriff, due to her specific responsibilities. Defendant Sheriff provided an exhibit of Plaintiff's "deputization."

68. As part of the suit, Defendant Sheriff alleged that *because* Plaintiff was a special deputy, she could not be removed from Defendant Sheriff's authority.

69. On February 18, 2026, the Washtenaw County Board of Commissioners passed County Resolution 26-028. The resolution transferred many of Defendant Sheriff's HR *functions* to Defendant County; however, Defendant Sheriff's HR *personnel* remained with Defendant Sheriff.

70. In 25-002227-CZ, the suit referenced above, Defendants Sheriff and County submitted a stipulated order dismissing the action following Defendant County's motion for Summary Disposition filed. The dismissal was signed on March 20, 2026.

The County Has a Collective Bargaining Agreement for Every Other Deputy

71. On January 1, 2021, Defendant County and Defendant Sheriff entered into a collective bargaining agreement with the Police Officers Association of Michigan ("POAM").

72. The agreement requires a written notice of charges prior to any discipline or discharge of bargaining unit members. The notice must be served at least ten business days prior to any disciplinary action.

73. The agreement requires a hearing in front of the Sheriff or her designated representative. The hearing must be requested by the employee within five business days, scheduled no sooner than five business days later, and no member shall be required to make any statements concerning the alleged offense prior to the hearing.

74. The agreement allows representation by an attorney at all stages of a policy violation investigation or the disciplinary procedure.

75. The agreement forbids Defendant Sheriff from basing her decision upon any infractions of rules or regulations which occurred more than two years previously.

76. Unlike the requirements for nearly every other employee of Defendant Sheriff, Plaintiff was terminated for conduct which allegedly occurred more than two years previously, was not allowed representation during the process, was not part of the hearing on the allegations, was not provided a notice of charges before Plaintiff was required to make a statement about the unknown allegations, and was not provided with an impartial decision-maker on the charges.

COUNT I
Violation of the Whistleblowers' Protection Act
MCL § 15.361 *et seq.*
(As to All Defendants)

77. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

78. The Whistleblowers' Protection Act prohibits employers from discharging, threatening, or otherwise discriminating against an employee who "reports or is about to report . . . a violation or suspected violation of a law . . . to a public body." MCL § 15.362.

79. Both Defendant Sheriff, and any employee of; and Defendant County, and any employee of, are considered a "Public Body" under MCL § 15.361(d).

80. Plaintiff engaged in a "protected activity" as defined by the Whistleblowers' Protection Act when she reported the unsatisfactory qualifications of new hires to Richardson, the Undersheriff, and Defendant County.

81. Defendant Sheriff and Defendant County were aware of Plaintiff's reports to Richardson, the Undersheriff, and Defendant County.

82. Defendant Sheriff subjected Plaintiff to adverse employment actions, including but not limited to retaliatory harassment and termination of Plaintiff's employment without due process.

83. Defendant County discriminated against Plaintiff when it investigated Plaintiff's reports without seeking meaningful participation from Plaintiff.

84. Defendants were motivated by Plaintiff's protected activity under the Whistleblowers' Protection Act when they committed the previously stated adverse employment actions against Plaintiff.

85. But for Plaintiff's protected activity under the Whistleblowers' Protection Act, Defendant Sheriff would not have terminated Plaintiff's employment.

86. As a direct and proximate result of Defendant Sheriff’s conduct, Plaintiff has sustained injuries and damages including but not limited to, loss of earnings and earning capacity; loss of career opportunities; loss of fringe and retirement benefits; mental anguish; physical and emotional distress; humiliation and embarrassment; and loss of professional reputation.

COUNT II
Constitutional-Tort-Claim — Violation of Const. 1963 art. I § 17 Due Process
(As to All Defendants)

87. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

88. Plaintiff was a public employee and “enjoy[ed] a property right in continued employment which the state may only take away in accordance with due process.” *Garner v. Michigan State University*, 185 Mich. App. 750, 759 (1990).

89. Enforcement of Const. 1963, art. I, § 17 “has not been delegated to the Legislature and . . . no other adequate remedy exists to redress the alleged violations of plaintiffs’ right.” *Bauserman v. Unemployment Insurance Agency*, 509 Mich. 673, 681 (2022).

90. Defendant Sheriff at all material times held a position as a constitutional officer with duties and powers provided by law. *See Brownstown Twp. v. Wayne County*, 68 Mich. App. 244, 247-48 (1976).

91. Defendant County at all material times formed the policies, practices, and customs, which led to the violation of due process.

92. Before deprivation of Plaintiff’s property right, procedural due process “requires notice, an opportunity to be heard, and an impartial decision-maker.” *Upper Peninsula Power Co. v. Vill. of L’Anse*, 334 Mich. App. 581, 596 (2020).

93. Plaintiff did not provide notice *before* the opportunity to be heard.

94. Plaintiff was not provided with an impartial decision-maker.

95. The termination “was so arbitrary . . . as to shock the conscience” in violation of substantive due process. *Mettler Walloon, LLC. v. Melrose Twp.*, 281 Mich. App. 184, 200 (2008).

96. As a direct and proximate result of Defendants violation of due process, Plaintiff has sustained injuries and damages including but not limited to, loss of earnings and earning capacity; loss of career opportunities; loss of fringe and retirement benefits; mental anguish; physical and emotional distress; humiliation and embarrassment; and loss of professional reputation.

RELIEF REQUESTED

WHEREFORE, Plaintiff requests the following relief from this Court against Defendants:

- A. Economic damages resulting from Defendants’ actions including but not limited to lost wages, lost employment, and lost job opportunities;
- B. Noneconomic damages including but not limited to harm to reputation, embarrassment, humiliation, severe emotional distress, deprivation of enjoyment of life;
- C. Exemplary damages;
- D. An award of costs and reasonable attorney fees; and
- E. Whatever other equitable relief this Court may find appropriate.

Respectfully submitted,

NACHTLAW, P.C.

/s/ Adam M. Dreher
Adam M. Dreher (P79246)
Attorney for Plaintiff

Dated: June 4, 2026