

IN THE CHANCERY COURT OF MOORE COUNTY
AT LYNCHBURG, TENNESSEE

TYLER HATFIELD,
MOORE COUNTY SHERIFF,

Petitioner,

-vs-

JIM SANDERS, in the capacity of
MOORE COUNTY ELECTION COMMISSION,

and

TENNESSEE PEACE OFFICERS
STANDARDS TRAINING COMMISSION,

and

WILLIAM RALINE,
CANIDATE FOR MOORE COUNTY SHERIFF,

Respondents.

Case Number: 3322

FILED February 20, 2022
RULE DOCKET BOOK
AT 10:35 (A.M.) P.M.
TAMMY P. ROBERTS
CLERK & MASTER
Tammy P. Roberts

VERIFIED PETITION FOR PEREMPTORY WRIT OF MANDAMUS AND IN THE
ALTERNATIVE BY EQUITABLE ESTOPPEL TO PLACE SHERIFF HATFIELD ON
THE AUGUST 6, 2026, GENERAL ELECTION BALLOT

COMES NOW, the Petitioner, Moore County Sheriff Tyler Hatfield, by and through undersigned counsel, Garth R. Segroves, and would state the following Petition is being brought through this Honorable Court, to order the Tennessee Secretary of State to place the Petitioner on the August 6, 2026 ballot as an independent candidate for Moore County Sheriff, based upon the following:

1. That jurisdiction and venue are proper in this matter, in that the Petitioner is a resident of Moore County, Tennessee and currently serving as Moore County Sheriff.

2. That the jurisdiction and venue are proper in this matter for the Respondents, Jim Sanders, Moore County Election Commission; and, Tennessee Peace Officer Standards and Training Commission (hereinafter referred to as "POST Commission") because these two Respondents are consequential and indispensable in the election for Moore County Sheriff where this cause of action arises.

3. That Respondent William Raline is being put on notice as a Respondent because he is a Moore County resident and is running for the Moore County Sheriff position in which relief is being sought by the Petitioner, no allegations against this Respondent are being made by the Petitioner.

4. That subject matter jurisdiction is proper.

FACTUAL BASIS FOR PETITION

5. That Petitioner Moore County Sheriff Tyler Hatfield (hereinafter referred to as "Petitioner Sheriff Hatfield") was elected to his position on August 2, 2018.

6. That Petitioner Sheriff Hatfield was re-elected, unopposed, on August 4, 2022.

7. That between the August 4, 2022, election and the scheduled August 6, 2026, election, Moore County instituted a primary system for county elections for the first time, prior to which this position was not primaried.

8. That Respondent Jim Sanders has been the Moore County Election Commissioner since 2016.

9. That T.C.A. 8-8-102(a)(1-10) outlines requirements for prospective candidates to qualify for to run for the sheriff position in any county in Tennessee. (Please see attached T.C.A. 8-8-102 as Exhibit A).

10. That the Petitioner meets the requirements as set out in T.C.A. 8-8-102(a)(1-10) for the August 2026, as he has done in the previous two election cycles for Moore County Sheriff. (Respondent's packet that was delivered to the Respondent POST Commission, attached as Exhibit B).

11. That the Petitioner met with Respondent Jim Sanders at some point in late December 2025 to discuss how the new primary election system would affect local candidates for local elections.

12. That the Petitioner was told by Respondent Jim Sanders in the previously identified meeting that the primary election would only affect candidates who were seeking a party nomination and not a candidate running as independent candidate, and that the Petitioner could pick up his election packet on January 9, 2026. (See Affidavit of Respondent Jim Sanders, attached as Exhibit C).

13. That Petitioner retrieved his election packet on January 12, 2026, and was told by the Respondent Jim Sanders to adhere to the Moore County General Election Timeline. (See Exhibit C).

14. That Petitioner collected signatures for qualification from January 15, 2026, through January 19, 2026. (See Exhibit B).

15. That the Petitioner completed the entirety of the requirements for the position of Sheriff by January 26, 2026, which included certifications, birth certificate, ink and roll fingerprints and other documentation that was required. (See Exhibit B).

16. That on Friday, February 13, 2026, Petitioner's packet was hand delivered to the Respondent POST Commission.

17. That the Respondent Jim Sanders posted Election Notices outside his office door and through the Moore County Observer Election Notices stating that the deadline for POST Commission was February 24, 2026, as relied upon by the Petitioner. (See Exhibit C, attachment 1 & 2).

18. That the Petitioner would state that there is no other reason that he would be disqualified from being on the August 6, 2026, general election ballot had it not been for the late filed paperwork to the Respondent POST Commission.

19. That by this disqualification, the Petitioner is suffering harm that can only be rectified through the court system, there is no alternative.

CAUSE OF ACTION

PEREMPTORY WRIT OF MANDAMUS

**Seeking that Petitioner's Name be Placed on the August 6, 2026, General Election Ballot
Authority Granted Pursuant to T.C.A. §§ 29-25-101 – 29-25-109**

20. That pursuant to T.C.A. 29-25-102, the Petitioner is seeking that this Honorable Court order the Respondent POST Commission to certify the Petitioner (pending that he qualifies other than the claimed late filing) and that the Respondent Jim Sander's, in his capacity of Election Commissioner, place the Respondent on the August 6, 2026, General Election Ballot.

21. That the reliance of statements and notices made by the Respondent Jim Sanders, in his capacity as the Moore County Election Commission was the sole reason that the deadline was missed by the Petitioner.

22. Based upon the Petitioner's reliance and missed deadline, the act of disqualifying the Petitioner by the Respondent POST Commission was a ministerial act, which is the basis for a writ of mandamus.

23. That had it not been for the Petitioner's reliance on Respondent Jim Sander's statements and publications, he would not have been harmed.

24. That the Petitioner's paperwork was turned in well before the deadline, as he understood it to be (albeit being late) from the reliance on Respondent Jim Sander's.

25. The Respondent Jim Sander's had a duty to provide the Petitioner with complete and accurate information regarding the qualifications and procedures in a newly formed primary election system in Moore County that changed deadlines for some elected positions, and not others.

26. Respondent Jim Sander's was not cognizant of how the "new to Moore County" election deadlines worked to the detriment of the Petitioner, which at this time has caused great harm to the Petitioner, despite all the requirements for the Respondent POST Commission being completed on January 26, 2026, well before the proper and accurate deadline of February 5, 2026.

27. That given the fact that Petitioner is running as an independent, and will not be on a primary election ballot, the access to the general election ballot will not cause significant issue to the reprinting of ballots, so long as this matter is concluded in a timely fashion.

CAUSE OF ACTION – ALTERNATIVE
EQUITABLE ESTOPPEL

Allowing the Petitioner to be Approved by POST Commission and the Moore County Election Commission place on the General Election Ballot for August 6, 2026

28. For this cause of action, the Petitioner would incorporate on the facts and allegations in the preceding paragraphs 1-26.

29. That the Petitioner was presented false material facts by the Respondent Jim Sanders.

30. That it is alleged that the Respondent Jim Sanders intended for the Petitioner to rely on these false material facts, not intentionally false; but negligently incorrect.

31. That the Petitioner did not have knowledge of the correct information, due in part to statements made Respondent Jim Sanders and publication made by him.

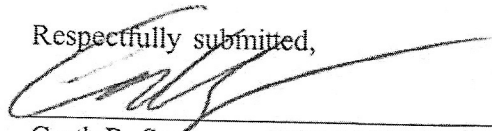
32. That the Petitioner relied on this information to his detriment.

PRAYER FOR RELIEF

That based upon the foregoing allegations, the Petitioner prays for the following:

- a. That the Respondent POST Commission be ordered to certify the Petitioner to be on the Moore County August 6, 2026, General Election Ballot as soon as possible, if not immediately.
- b. That should the Respondent POST Commission fail to comply with the certification, that a show cause hearing be scheduled as soon as possible.
- c. That upon certification by the Respondent POST Commission, the Respondent Jim Sanders be ordered to place the Petitioner on the August 6, 2026, General Election Ballot.
- d. Any other relief that this Honorable Court deems appropriate.

Respectfully submitted,



Garth R. Segroves, BPR 023358

113 West Moore Street

Tullahoma, Tennessee 37388

Telephone: (931) 393-4366

Facsimile: (931) 259-4466

Email: garth_segroves@att.net

Attorney for Petitioner Sheriff Tyler Hatfield

VERIFICATION

STATE OF TENNESSEE }
COUNTY OF MOORE }

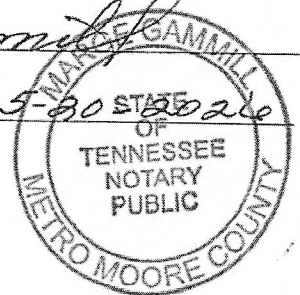
I, Tyler Hatfield, after having been duly sworn according to law, hereby depose and state that the facts and statements in the foregoing Complaint are true and correct to the best of my information, knowledge and belief.


Tyler Hatfield

Sworn and subscribed before me on this the 20th day of February, 2026.

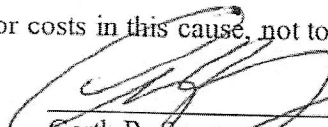

NOTARY PUBLIC

My Commission Expires: 5-30-2026



SURETY

I, Garth R. Segroves, am surety for costs in this cause, not to exceed \$1,000.00.


Garth R. Segroves