

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY

FREDDIE O'CONNELL
MAYOR

BOARD OF ETHICAL CONDUCT
OFFICE OF THE METROPOLITAN CLERK
1 PUBLIC SQUARE, SUITE 205
P.O. BOX 196300
NASHVILLE, TENNESSEE 37219-6300
(615) 862-6770

July 7, 2026

TO: COUNCILMEMBER COURTNEY JOHNSTON

FROM: THE METROPOLITAN BOARD OF ETHICAL CONDUCT

RE: WRITTEN WARNING FOR VIOLATION OF THE
METROPOLITAN STANDARDS OF CONDUCT

Dear Councilmember Johnston,

On June 29, 2026, the Board of Ethical Conduct ("Board") of the Metropolitan Government of Nashville and Davidson County conducted a hearing on the ethics complaint filed against you by Melanie Cochran and Elizabeth MK Sullivan, alleging violations of the Standards of Conduct set forth in Chapter 2.222 of the Metropolitan Code ("Standards of Conduct").

As detailed in the Board's July 7, 2026 Final Order attached to this correspondence, the Board determined by the preponderance of the evidence that you violated sections 2.222.020(k) and 2.222.020(r) of the Metropolitan Code. The Board imposed the sanction of a written warning to you for violation of sections 2.222.020(k) and 2.222.020(r) of the Standards of Conduct.

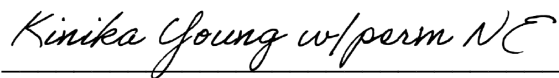
This correspondence constitutes the Board's written warning to you as sanction for violating the Standards of Conduct.

The Board determined that given that you no longer hold the nonprofit board position that created the problem, and the Metropolitan Council votes on the rezoning legislation have already taken place, this warning would not contain a specific request or recommendation for action at this time. The Board notes, however, that:

- (i) The Board made a finding of a violation of the Standards of Conduct;

- (ii) You should be aware of the Board's finding that a violation of the Standards of Conduct has occurred;
- (iii) You should take the Board's finding of a violation into account for any future disclosures, given that there is now a record that there was an issue with your 2025 disclosure statement; and
- (iv) To the extent any future Metropolitan Council votes arise with regard to the particular project addressed in the rezoning legislation, you should pay particular attention to whether recusal is warranted at that time under those circumstances.

Sincerely,

Handwritten signature of Kinika Young in cursive script.

Kinika Young, Chairperson
Metropolitan Board of Ethical Conduct

Attachment: Final Order of Board of Ethical Conduct

Copy to: The Honorable Angie E. Henderson
Vice Mayor of the Metropolitan Government

**BEFORE THE BOARD OF ETHICAL CONDUCT
OF THE
METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY
TENNESSEE**

Melanie Cochran and Elizabeth MK Sullivan,	)
	)
Complainants,	)
	)
v.	)
	)
Courtney Johnston,	)
Member of the Metropolitan Council,	)
	)
Respondent.	)

FINAL ORDER

The Board of Ethical Conduct (“Board”) of the Metropolitan Government of Nashville and Davidson County conducted a hearing in this matter on June 29, 2026. As set forth below, the Board concluded that based on a preponderance of the evidence, Councilmember Courtney Johnston (“Respondent”) violated sections 2.222.020(k) and 2.222.020(r) of the Metropolitan Code. The Board imposed the sanction of a written warning on the Respondent for violation of the Standards of Conduct set forth in Chapter 2.222 of the Metropolitan Code (the "Standards of Conduct").

The complaint filed on April 15, 2026, by Melanie Cochran and Elizabeth MK Sullivan, alleged that the Respondent violated the Mayor’s Executive Order No. 22 and the Standards of Conduct set forth in section 2.222.020 of the Metropolitan Code by:

- (1) failing to disclose on her annual disclosure statement, her position as a member of the board of directors of the nonprofit entity, Music City Children’s Museum (“MCCM”); and
- (2) deliberating and voting on a zoning change requested by an investor group that has offered MCCM a potential location in the development if the zoning change is

approved, while also working with the investor group on the rezoning in her capacity as a board member of MCCM.

Pursuant to the provisions of section 2.222.040(C)(1)(e) of the Metropolitan Code, the Department of Law evaluated the allegations of the complaint for the purpose of determining whether the facts as alleged, if proven true, could be deemed to be a violation of the Standards of Conduct. The Department of Law concluded that:

- (1) allegations concerning the Councilmember's failure to divulge her position as a member of the board of directors of MCCM on her annual disclosure statement, if true, could be deemed to be a violation of section 2.222.020(r) of the Metropolitan Code; and
- (2) allegations that the Councilmember deliberated and voted on a zoning change requested by an investor group that has offered MCCM a potential location in the development if the zoning change is approved, while also working with the investor group on the rezoning in her capacity as a board member of MCCM, if true, could be deemed to be a violation of sections 2.222.020(k) and 2.222.020(q) of the Metropolitan Code.

The Department of Law recommended that a hearing be held on allegations concerning violations of sections 2.222.020(k), 2.222.020(q), and 2.222.020(r) of the Metropolitan Code. The Department of Law further recommended that the Board dismiss allegations concerning violation of Executive Order No. 22.

On May 18, 2026, the Board considered the allegations against the Respondent in an open meeting. The Board adopted the recommendations of the Department of Law.

On June 29, 2026, the Board conducted an evidentiary hearing. Elizabeth MK Sullivan ("Complainant") and the Respondent were present at the hearing. The Complainant was represented by attorney, Bryan Pieper. The Respondent was represented by Jon Cooper of

Holland & Knight. The Complainant submitted a witness list and materials for the hearing. The Respondent submitted materials for the hearing. The Complainant testified at the hearing and was cross-examined by the Respondent's legal counsel. The Respondent testified at the hearing and was cross-examined by the Complainant's legal counsel.

After the presentation of evidence by both parties and closing arguments, the Board deliberated on the matters presented, considering the evidence, arguments, and relevant law. Following deliberation, motions were made and properly seconded. The Board, by a unanimous vote (5-0), determined as follows:

- The Respondent violated section 2.222.020(k) of the Metropolitan Code, which states that employees “[s]hall not give reasonable basis by their conduct ... the impression that any person can improperly influence, or unduly enjoy their favor in, the performance of their official duties, or that they are unduly affected by the kinship, rank, position or influence of any person”.
- The Respondent violated section 2.222.020(r) of the Metropolitan Code, which states that employees, “[i]f 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 not omit any material information reasonably necessary to make such reports complete and meaningful”.
- The Respondent did not violate section 2.222.020(q) of the Metropolitan Code, which provides that employees “[s]hall not personally represent or appear in behalf of the private interest of another before the metropolitan council, or any board or department of the metropolitan government;”

The Board, by a unanimous vote (5-0), further decided to impose the sanction of a written warning on the Respondent for violating sections 2.222.020(k) and 2.222.020(r) of the Metropolitan Code.

IT IS THEREFORE ORDERED AND ADJUDGED BY THE BOARD OF ETHICAL CONDUCT, that:

1. The preponderance of the evidence established that the Respondent, Councilmember Courtney Johnston, violated sections 2.222.020(k) and 2.222.020(r) of the Standards of Conduct; and
2. The Board, through its Chair, shall issue a written warning to the Respondent as sanction for engaging in conduct that violated the Standards of Conduct.

Entered, this the 7th day of July, 2026.

Kinika Young w/perm NE

Kinika Young, Chairperson
Metropolitan Board of Ethical Conduct

cc: Complainants, Melanie Cochran and Elizabeth MK Sullivan
Respondent, Councilmember Courtney Johnston