THE UNIVERSITY OF TENNESSEE MARTIN

Division of Academic Affairs
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October 13, 2026

Dr. Johnnie LaDue
123 Mockingbird Lane
Martin, TN 38237

RE: Notice of Termination for Adequate Cause for Misconduct

Dear Dr. LaDue,

On September 23, 2026, I informed you in writing that, pursuant to the University of Tennessee Martin (UT Martin) Faculty Handbook (Last revised 2026), BT0006—Policies Governing Academic Freedom, Responsibility, and Tenure (Version 13, Effective Date 06/30/2026) and HR0580—Code of Conduct (Version 11, Effective Date 02/01/2023), I had concluded that Adequate Cause for Termination for Misconduct may exist and that your faculty appointment with the University should, perhaps, be terminated.

I offered you the opportunity to respond to the stated grounds and the proposed termination in a meeting with me, in writing, or both. On September 28, 2026, I received, via email, a written response from you objecting to the sufficiency of the Notice of Adequate Cause and Opportunity to Respond (the "Notice"), as well as asserting that the University's directives were not lawful. I responded to you via letter dated September 30, 2026, to address your concerns with the sufficiency of the Notice and to provide you with additional time to supplement your response to the Notice, meet with me, or both. On October 6, 2026, I received, via email, a supplemental response from you objecting to the applicability of HR0580 to this matter. I did not receive a request from you to meet with me.

I have considered your objection to termination based on failure to comply with HR0580 – Code of Conduct, and I acknowledge the reasonableness of your position that HR0580 is not applicable to this matter. Nonetheless, having consulted with the Chancellor, as required by BT0006, I maintain the University's position that Adequate Cause for Termination for Misconduct still exists based on your refusal to follow the lawful directives of University officials. *See* Board of Trustees Policy BT0006, "Policies Governing Academic Freedom, Responsibility, and Tenure" Article III. Tenure, J. Termination of Tenure, 1. Grounds for Termination, c. Adequate Cause, (2) Misconduct.

I. Statement of the Grounds for Termination

As provided in the **UT Board of Trustees Policy BT0006**, the Adequate Cause grounds for Termination include the following:

> "Adequate Cause" for terminating a tenured faculty member means the following:
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> (2) Misconduct, which includes the following and similar types of misconduct:
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> b) refusal to follow lawful instructions, to perform designated work, or to comply with lawful directives of authorized university officials with respect to the faculty member's duties or responsibilities;

Board of Trustees Policy BT0006, "Policies Governing Academic Freedom, Responsibility, and Tenure" Article III. Tenure, J. Termination of Tenure, 1. Grounds for Termination, c. Adequate Cause, (2) Misconduct, (b).

As stated in the Notice, the basis for termination is your intentional and repeated failure to follow the lawful directives of University officials in accordance with the Riley Gaines Women's Safety and Protection Act, codified at Tenn. Code Ann. §§ 68-107-101, *et seq*. (2026) (the "Act"). The Act requires the University to: (1) "designate each multi-occupancy restroom or changing room for the exclusive use of females, males, or members of the same family" and (2) to "take reasonable steps to provide individuals with privacy in restrooms and changing rooms from members of the opposite sex." Tenn. Code Ann. §§ 68-107-108 (2026). The law specifically prohibits the University from "intentionally allow[ing] a member of the opposite sex to enter the restroom or changing facility while other persons are present" or "fail[ing] to take reasonable steps to prohibit the person of the opposite sex from using the restroom or changing room of the opposite sex." Tenn. Code Ann. §§ 68-107-111 (2026). The Act does not impact single occupancy restrooms.

You have acknowledged awareness of the law and understanding that your entry into the women's restroom violated the law. Upon the University's directive to stop the conduct, you gave no indication that you intended to follow the directive and, in fact, continued to engage in the same conduct, despite the availability of a single occupancy restroom that is designated for neither males nor females located on the same floor in the staff lounge area of the library. It is of the utmost importance to the University that faculty members comply with lawful directives.

II. Statement of Facts

On Thursday, September 17, 2026, a complaint by a University employee indicated you were seen entering the multi-occupancy restroom designated for women located in the staff hallway of the Paul Meek Library on the campus of the University of Tennessee at Martin. Dean Erik Nordberg met with you and provided verbal notice that your behavior was in violation of the Act. You were asked to cease the behavior by Dean Nordberg.

A University employee reported the same behavior by you on the following day. The University reviewed footage from the security camera that covers the entrance to the staff restrooms and confirmed your entry in the women's restroom. Consequently, a final written warning was delivered to you by Dean Nordberg on Monday, September 21. In this final warning, you were formally advised that your behavior constituted misconduct under the University of Tennessee's policies, and you again were ordered to cease use of any multi-occupancy restroom on University property that is designated for women only. You were instructed to use either the men's multi-occupancy restroom or the single occupancy restroom, both located in the Library. Further, you were notified that failing to do so would lead to disciplinary action up to and including termination under BT0006 and the UT Martin Faculty Handbook.

Dean Nordberg reported to me that in both meetings you verbally indicated you were aware that your behavior violated state law, but that the University should expect more complaints of a similar nature. Further, he reported that you verbally characterized your behavior as a form of civil disobedience.

At no point during this process have you disputed these facts, despite having multiple opportunities to do so either in writing or during face-to-face meetings with Dean Nordberg and me when we personally delivered previous correspondence to you. You did not exercise your right under BT0006 to meet with me upon receiving the Notice and instead chose to respond only in writing. Your written response to the Notice raised concerns with the adequacy of the Notice itself (which I corrected via a letter to you along with additional time for you to supplement your response), objected to the applicability of HR0580 (which I acknowledge is a reasonable position and have withdrawn failure to follow university policy as a basis for termination), and challenged the lawfulness of the Act (and, therefore, directives of the University). While I understand your legal position is that federal law prohibits the application of the Act to you, at present, the Act is in full force and effect in the State of Tennessee, and the University and its employees must abide by it. You have not expressed a willingness to abide by the Act if given another opportunity to do so.

I want you to know that disciplinary sanctions less than termination were considered. However, based on the repeated nature of your conduct and the written responses you provided to the Notice, I have no reason to believe that you will ever cooperate with the University so that it may comply with the Act. I am therefore unable to formulate an appropriate lesser sanction given the University's obligations under the law. I see no other option but to carry out my administrative duty "to remove from the faculty any faculty member who has been found, through proper procedures, seriously derelict in his or her responsibilities as a member of the academic community." BT0006, Article II, § 3. Otherwise, I would be putting the University in jeopardy of violating the Act.

III. Date of Termination

Accordingly, and pursuant to BT0006, Appendix C, §2.c.,your faculty appointment at UT Martin is terminated as of today's date, October 13, 2026.

For questions relating to your transition from employment with the University, the UT Martin Office of Human Resources will provide you with information concerning your individual benefit options and unemployment insurance available to you. You may reach out to Debbie Stairs, Director, Human Resources at dstairs@utm.edu or 731.881.7847. Please turn in all remaining UT Martin items (computer, laptop, badge, keys, official university documents or other items) to your supervisor within 5 days following receipt of this letter. You should make arrangements with your direct supervisor or me to collect any personal items and avoid coming to your prior office without official permission.

IV. Your Right to Contest the Decision

Should you wish to contest the termination of your employment, you have the right to contest the termination (a) in a post-termination hearing before an ad hoc hearing committee or (b) in a post-termination hearing under the provisions of the Uniform Administrative Procedures Act (see Appendix C, §§ 4.a. and 4.b. of BT0006, pp. 29 – 32). If you wish to exercise your right to one of the hearing options, you must provide me, by no later than October 28, 2026 (i.e., 15 calendar days from the date of this letter), with written notice of your election to contest your termination through either the ad hoc hearing committee or the Tennessee Uniform Administrative Procedures Act. Selection of one type of hearing waives the opportunity to contest the termination through the other type of hearing. Written notice of your election can be submitted via email at utmprovost@utm.edu or by mail.

Please note that if you do not contest the charges of misconduct in writing within fifteen (15) calendar days, no appeal of your termination will be heard within the University.

Sincerely,

Laurie L. Couch

Laurie L. Couch, Ph.D.
Provost & Senior Vice Chancellor for Academic Affairs

Cc: Dr. Erik Nordberg, Dean, Paul Meek Library
Dr. Anderson Starling, Associate Provost
Dr. Yancy Freeman, Chancellor
Human resources
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