

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

TRACI HOLLINGSWORTH,

Plaintiff,

v.

Sheriff ALFONZO WILLIAMS and
Inv. MARTRELL WILLIAMS,
both employees of the
Burke County Sheriff's Office
who are sued in their individual
capacities,

Defendants.

JURY TRIAL DEMANDED

Case No.:

COMPLAINT

Plaintiff Traci Hollingsworth brings this action against Burke County Sheriff Alfonso Williams and Burke County Investigator Martrell Williams (collectively "Defendants") under 42 U.S.C. § 1983 and the First Amendment of the United States Constitution seeking damages.

INTRODUCTION

1. This case is about the Defendants' misuse of government authority to punish Ms. Hollingsworth's public criticism. On May 22, 2025, Ms.

- Hollingsworth sent Burke County Sheriff Alfonzo Williams a single text message informing him of her plan to file a recall petition against him.
2. Her message was constitutionally protected political speech on a matter of public concern.
 3. The next day, Sheriff Williams and Burke County Investigator Martrell Williams sought and obtained an arrest warrant for Ms. Hollingsworth, charging her with “Harassing Communications” under O.C.G.A. § 16-11-39.1.
 4. O.C.G.A. § 16-11-39.1(e) explicitly states, “This Code Section shall not apply to constitutionally protected speech.”
 5. Defendants’ retaliatory motive to prosecute Mrs. Hollingsworth for her protected speech is plainly stated on the face of the incident report which complains that Ms. Hollingsworth had posted derogatory comments about Sheriff Williams in public forums for over a year and that he had chosen not to respond, but now wanted to press criminal charges because she had contacted him about her recall petition.
 6. No probable cause existed to charge Ms. Hollingsworth with “Harassing Communications.”
 7. The Burke County Chief Magistrate Judge agreed, stating in a June 24, 2025 Order to Recall Warrant: “After clarification of the incident report

- and investigators testimony, information that was not provided to the Court at the time of signing the warrant, the Court finds that there is no probable cause on which to issue a warrant.”
8. Yet, the baseless and retaliatory warrant caused Ms. Hollingsworth to spend weeks away from her home, her husband, and her thirteen-year-old son because returning to Burke County meant she would be arrested.
 9. Further, Defendants created and publicly posted on the Burke County Sheriff’s Office’s Facebook page a Be-On-the-Lookout (“BOLO”) communication that falsely accused Ms. Hollingsworth of the crime of “Harassing Communications,” damaging her name and reputation.
 10. After the “Harassing Communications” warrant was recalled, Defendants refused to remove the BOLO from the Sheriff’s Office’s social media, despite requests from Ms. Hollingsworth to take it down, causing her further reputational harm.
 11. This case is brought to establish accountability for Defendants’ violation of Ms. Hollingsworth’s First Amendment right to speak on matters of public concern without being retaliated against by government officials.
 12. Defendants’ punitive action against Ms. Hollingsworth because of her criticism of Sheriff Williams’ job performance is not only harmful to Ms. Hollingsworth, but also severely degrades the willingness of Burke

County residents to engage in constitutionally protected speech and to participate in democratic processes.

PARTIES

13. Plaintiff Traci Hollingsworth (“Plaintiff” or “Ms. Hollingsworth”) is a United States citizen, and a resident of Waynesboro, Georgia located in Burke County. She is competent to bring this lawsuit.
14. Defendant Alfonzo Williams is the Sheriff of Burke County (“Sheriff Williams”) and is sued in his individual capacity. At all times relevant to this complaint, Sheriff Williams acted under the color of law.
15. Defendant Martrell Williams is an investigator with the Burke County Sheriff’s Office (“Investigator Williams”) and is sued in her individual capacity. At all times relevant to this complaint, Investigator Williams acted under the color of law.

JURISDICTION AND VENUE

16. This action arises under the First Amendment to the U.S. Constitution and 42 U.S.C. § 1983.
17. This Court has subject matter jurisdiction under 28 U.S.C §§ 1331 and 1343.
18. Venue in this Court is proper under 28 U.S.C. § 1391 because the events giving rise to Plaintiff’s claims arose in this district and division, and

because, upon information and belief, both Defendants are residents of the State of Georgia and reside in this district and division.

FACTS GIVING RISE TO PLAINTIFF'S CLAIMS

19. On May 22, 2025, Ms. Hollingsworth texted the following message to Sheriff Williams's at phone number 706-589-1163:

You know who this is, Traci MF Hollingsworth. You are the biggest POS I have ever met. I just want you to know that I have had a hand in EVERYTHING from your residency hearing for election in 2016, until now. Your friends aren't [sic] your friends and the FBI knows it all. Have fun in prison. Your time is coming. Try and fight this recall I'm about to unleash on your ass. After the last election, I'm pretty sure there are more than 'me and the 12 against you.' May the odds not ever be in your favor.

20. 706-589-1163 is the phone number at which Sheriff Williams encourages his constituents to contact him.

21. The next day, May 23, 2025, Investigator Williams, who was hired by Sheriff Williams and mentored by him at Augusta Technical College's Peace Officers Training Academy, prepared an Incident Report (the "Report") identifying Sheriff Williams as both the complainant and the victim, and Ms. Hollingsworth as the offender.

22. The Report charged Ms. Hollingsworth with violating O.C.G.A. 16-11-39.1, Harassing Communications, based on the following alleged facts:

Sheriff Williams stated that Hollingsworth first sent a text message and then unsent the text message at 1946 hours.

Approximately ten minutes later, at 1957 hours, Traci Hollingsworth then sent another message with the intent to intimidate and harass Sheriff Williams.

23. Though not stated in the Report, the message unsent at 1946 hours was the same message sent at 1957 hours, only with a spelling error corrected.
24. The Report goes on to state:

Inv. Williams further spoke with Sheriff Williams and learned that Hollingsworth has a history of posting derogatory [sic] comments about Sheriff Alfonzo Williams on public forums for over (1) year. Sheriff Williams stated that he has chosen not to respond to any of Hollingsworth tactics in the past but that he now wants to press criminal charges for the most recent actions of Hollingsworth, that being making contact by on his personal cellphone for the purpose of harassing or intimidating.
25. Again, Ms. Hollingsworth texted Sheriff Williams at the same number that he urges members of the public to use to contact him.
26. As referenced in the Report, Ms. Hollingsworth has been a vocal critic of Sheriff Williams and the Burke County Sheriff's Office on matters of public concern well before May 22, 2025.
27. For example, in 2020, she commented on the Burke County Sheriff's Office Facebook Page about the Sheriff's Office's treatment of her husband after he was injured in the line of duty during his employment with the Sheriff's Office.
28. In 2023, she commented about the Sheriff's Office allegedly exposing her husband, other officers, and members of the public to lead poisoning.

29. In 2023, Ms. Hollingsworth commented on the Burke County Sheriff's Office Facebook page about a Georgia Bureau of Investigation Administrative Inquiry involving alleged irregularities in an officer's training record.
30. Ms. Hollingsworth has made posts on her personal Instagram and Facebook pages criticizing Sheriff Williams's use of taxpayer funds.
31. Ms. Hollingsworth has additionally made comments on the Facebook page of a local news outlet, Bird Dog Politics, criticizing Sheriff Williams' use of his office's budget and discussing her intentions to initiate a recall petition.
32. Without limitation, all of the foregoing speech by Ms. Hollingsworth involves matters of public concern relating to an elected public official (Sheriff Williams) and is protected under the First Amendment of the United States Constitution.
33. On May 23, 2025, the same day that Defendants prepared the Report regarding Ms. Hollingsworth recall petition text message, Investigator Williams sought and obtained an arrest warrant, charging Ms. Hollingsworth with violating O.C.G.A. § 16-11-39.1.

34. On June 3, 2025, unaware of the warrant, Ms. Hollingsworth's husband and stepdaughter were driving in Burke County in a truck registered in Ms. Hollingsworth's name.
35. The truck broke down, and Mr. Hollingsworth called OnStar for roadside assistance.
36. Onstar contacted the Burke County Sheriff's Office.
37. When three officers arrived on scene, rather than approach the driver's side of the vehicle, they swarmed the passenger side of the truck where Ms. Hollingsworth's step-daughter, who resembles Ms. Hollingsworth, was seated, only to discover she was not Ms. Hollingsworth.
38. On June 6, 2025, Investigator Williams called Ms. Hollingsworth, informed her of the outstanding warrant, and directed that she turn herself in.
39. This was the first Ms. Hollingsworth learned of the warrant.
40. Ms. Hollingsworth informed Investigator Williams that she was unable to turn herself in because she was in Tennessee for work.
41. Investigator Williams informed Ms. Hollingsworth that the Sheriff's Office would be issuing a Be-On-the-Lookout ("BOLO") communication about her. The BOLO, which was posted on the Sheriff's Office's Facebook page on June 9th, 2025, stated:

B.O.L.O. - WANTED PERSON

The Burke County Sheriff's Office is currently seeking Traci Whitaker Hollingsworth, who is wanted for harassing communications.

If you have any information regarding her whereabouts, please contact our Criminal Investigation Division at:

(706) 554-6633 or (706) 554-2133

Your assistance is appreciated as we work to resolve this case.



42. The B.O.L.O. damaged Ms. Hollingsworth's name and reputation as it falsely accused her of committing a crime.
43. After Investigator Williams' June 6, 2025 phone call, Ms. Hollingsworth did not return to her residence and family in Burke County for fear that she would be arrested and jailed.

44. Ms. Hollingsworth feared what would happen to her at the Burke County Jail, which is operated by Sheriff Williams and his delegees, if she were arrested.
45. On June 24, 2025 the Burke County Chief Magistrate Judge issued an Order to Recall Warrant stating: “After clarification of the incident report and investigators testimony, information that was not provided to the Court at the time of signing the warrant, the Court finds that there is no probable cause on which to issue a warrant.”
46. After the warrant against Ms. Hollingsworth was recalled, the Sheriff’s Office’s B.O.L.O. remained posted on the Sheriff’s Office’s Facebook page for months, including up to the date this Complaint was filed, despite repeated requests from Ms. Hollingsworth that it be removed.
47. This is continuing to damage Ms. Hollingsworth’s reputation.

CLAIMS FOR RELIEF

Deprivation of First Amendment Rights

48. Paragraphs 1 – 47 are incorporated as if fully set forth herein.
49. Ms. Hollingsworth engaged in constitutionally protected First Amendment activity when she posted critical comments about Sheriff Williams and his office in electronic public forums.

50. Ms. Hollingsworth engaged in constitutionally-protected First Amendment speech when she texted Sheriff Williams on May 22, 2025 about filing a recall petition against him.
51. Defendants' accusing Ms. Hollingsworth of violating O.C.G.A. § 16-11-39.1, obtaining a warrant for her arrest without probable cause, issuing a B.O.L.O. falsely accusing her of a crime, and continuing to leave the B.O.L.O. posted even after the warrant against Ms. Hollingsworth has been judicially recalled constitute adverse actions that would reasonably deter a person of ordinary firmness from speaking.
52. Defendants took the foregoing adverse actions against Ms. Hollingsworth because of her protected speech.
53. Defendants therefore violated Ms. Hollingsworth's First Amendment rights.

REQUEST FOR RELIEF

WHEREFORE, on the basis of the foregoing, Ms. Hollingsworth respectfully prays that this Court:

- A. Hold a trial by jury on all issues so triable;
- B. Declare that Defendants violated Ms. Hollingsworth's rights under the First Amendment to the U.S. Constitution;

- C. Award compensatory damages, including nominal damages, for the violation of Ms. Hollingsworth's First Amendment rights;
- D. Award reasonable attorneys' fees, expenses, and costs of litigation pursuant to 42 U.S.C. § 1988 and other applicable law; and
- E. Award such other relief as this Court deems just and proper

Dated: October 14, 2025

/s/Clare Norins

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*Thank you to Clinic students Eric Pruitt and Jordan Elwarner for co-authoring this pleading.

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