REPORTERS COMMITTEE
FOR FREEDOM OF THE PRESS

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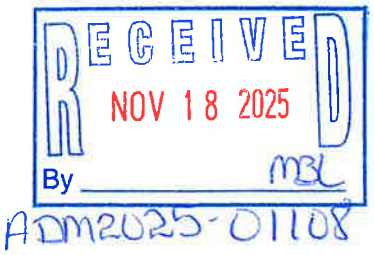

November 18, 2025

VIA EMAIL

James Hivner, Clerk
100 Supreme Court Building
401 7th Avenue North
Nashville, TN 37219-1407
appellatecourtclerk@tncourts.gov

Re: 2026 Rules Package, No. ADM2025-01108

Dear Mr. Hivner:

The Reporters Committee for Freedom of the Press ("RCFP" or the "Reporters Committee") submits these comments in response to the Supreme Court of Tennessee's Order soliciting written comments concerning the Advisory Commission on the Rules of Practice & Procedure's proposed amendments to the Rules of Appellate Procedure and Criminal Procedure (Dkt. No. ADM2025-01108).

The Reporters Committee is an unincorporated nonprofit association whose attorneys provide pro bono legal representation, amicus curiae support, and other legal resources to protect First Amendment freedoms and the newsgathering rights of journalists.[1] It writes to provide comments on Proposed Rule 20B of the Tennessee Rules of Appellate Procedure, titled "Public Access to Appellate Court Filings and Privacy Protections" ("Proposed Rule 20B"). The Reporters Committee has long championed the public's rights of access to judicial records and appreciates the opportunity to comment on this important issue.

Proposed Rule 20B

Proposed Rule 20B will govern the public's right of access to filings made in Tennessee Appellate Courts. It describes categories of information that should either be omitted from filings or remain protected from public disclosure and provides a procedure by which certain protected information can be omitted or redacted from public filings.

At the heart of Proposed Rule 20B, is its definition of "Confidential Information" as "information that is protected from public disclosure or is required to be kept confidential by Tennessee law, federal law, or court rule or order," *id.* at 20B(2)(d), including, among other things:

[1] More information about RCFP and its work is available at www.rcfp.org.

- Personal identification numbers such as Social Security numbers, driver's license numbers, taxpayer identification numbers, and passport numbers;
- Financial account numbers;
- Dates of birth;
- Names of persons known to be minors;
- Case numbers of confidential, expunged, or sealed records in cases other than the one in which the Filing is made;
- Information identifying a person receiving mental health or substance-use-disorder services;
- Medical information the confidentiality of which is protected by Tennessee or federal law; and
- Records of students in education institutions the confidentiality of which records is protected by Tennessee or federal law.

Id. Proposed Rule 20B explains that, if possible, Confidential Information should be omitted from filings, but then further states that "[w]hen it is necessary to include Confidential Information, that Information *must* be redacted before the Filing is filed or submitted." *Id.* at 20B(3)(c)-(d) (emphasis added). It also provides that "[f]or good cause, the Court may order redaction of additional information in a redacted filing or may limit or prohibit public access to a Filing." *Id.* at 20B(3)(e). To the extent a court record is ordered to be redacted or sealed, Proposed Rule 20B includes no requirement that courts provide any explanation detailing why a closure order was issued.

I. The Provision for Automatic Redactions of Categories of Information Raises Constitutional and Practical Concerns.

As an initial matter, there are constitutional issues with the extensive list of information that parties would be permitted to redact without a court order in Proposed Rule 20B and practical issues with other aspects of this list.

In *Globe Newspaper Co. v. Superior Court*, 457 U.S. 596 (1982), the U.S. Supreme Court held that mandatory closure of a courtroom based on a state statute for when a minor victim testifies in a criminal sex-offense trial was unconstitutional because, among other things, it did not require "particularized determinations in individual cases." *Id.* at 611 n.27. While the Court understood that "safeguarding the physical and psychological well-being of a minor" was certainly a "compelling" interest, it did "not justify a *mandatory* closure rule, for it is clear that the circumstances of the particular case may affect the significance of the interest." *Id.* at 608. Instead, the Court held that the trial court must make determinations with respect to such closures on a "case-by case basis" to "ensure[] that the constitutional right of the press and public to gain access to criminal trials will not be restricted except where necessary to protect the State's interest." *Id.* And, of course, "[t]he openness of judicial proceedings extends to judicial records." *In re NHC*, 293 S.W.3d 547, 560 (Tenn. Ct. App. 2008) (citing *Huskey*, 982 S.W.2d at 362-63). Pursuant to this precedent, the automatic redactions that would be permitted under Proposed Rule 20B raise serious concerns.

Automatic redactions may be appropriate in limited circumstances. For example, under Tenn. Code Ann. § 20-6-102(a), unless otherwise required by statute, court rule, or court order, a court filing shall include only:

(1) The last four (4) digits of the social security number and taxpayer identification number;
(2) The year of the individual's birth;
(3) The minor's initials; and
(4) The last four (4) digits of the financial account number.

Id. This list is identical to the one in Fed. R. Civ. P. 5.2(a)(1)-(4). These provisions allow for the public to remain informed about judicial proceedings without risking the dissemination of information that may result in harm to an individual's personal or financial security. However, there is no need for Proposed Rule 20B to go farther than the Tennessee General Assembly and federal courts have gone.

In the case of minors, there may be a need for more nuance than is reflected in Proposed Rule 20B. The proposed rule mandates redaction of "[n]ames of persons known to be minors." This is at odds not only with Tenn. Code Ann. § 20-6-102(a)(3) (which contemplates inclusion of the minor's initials), but also statutes governing confidentiality of juvenile criminal proceedings.

In particular, Tenn. Code Ann. § 37-1-153(b) specifically provides that "petitions and orders of the court in a delinquency proceeding under this part shall be opened to public inspection and their content subject to disclosure to the public" in specific circumstances, including where the juvenile is 14 years old or older and/or where the delinquent act is one of the many listed serious offenses. On an appeal in a case involving a situation where Tenn. Code Ann. § 37-1-153(b) applies, there would be an unnecessary and nonsensical inconsistency where the name of the juvenile could be made public at the trial court level, but not, under Proposed Rule 20B, at the appellate level.

Proposed Rule 20B(3)(d)(ix) also provides that "[m]edical information the confidentiality of which is protected by Tennessee or federal law" should be redacted from court filings. This language, however, is broad and does not accurately reflect how certain medical information, even if generally protected under federal and state law, may in fact be subject to disclosure under certain circumstances. For instance, the Court of Appeals has held that otherwise confidential medical information should not be sealed "when it forms the basis of the trial court's decision or is otherwise relevant to the issues in the case." *Doe by Doe v. Brentwood Acad. Inc.*, 578 S.W.3d 50, 55 (Tenn. Ct. App. 2018).

Medical information may also form the basis of criminal charges. For example, some medical information about a victim is pertinent to knowing when to charge someone for assault versus aggravated assault. *Compare* Tenn. Code Ann. § 39-13-101(a)(1) (identifying an assault as causing "bodily injury") *with* Tenn. Code Ann. § 39-13-102(a)(1)(A)(i) (identifying aggravated assault as including assault that "[r]esults in serious bodily injury to another). Under Proposed Rule 20B, medical information related

to the charge would be automatically redacted, leaving the public in the dark about the allegations giving rise to a criminal prosecution.[2] Proposed Rule 20(B) fails to account for these subtleties in its broad command that all protected medical information must be redacted.

Finally, Proposed Rule 20B(2)(d)(vi), which provides for automatic redaction of "case numbers of confidential, expunged, or sealed records in cases other than the one in which the Filing is made," is, at best, unclear. While "sealed" records and "expunged" records have a defined meaning, it is unclear what "confidential" records are in this context. It is also unclear why automatic redaction of "case numbers" in this provision are of the same import as the other categories of information listed. It makes little sense for the case number of a case that has a sealed record to itself be automatically redacted as the case number is not, standing alone, a sensitive record.

To the extent the Advisory Committee determines that providing for automatic redaction of categories of information beyond those set forth in Tenn. Code Ann. § 20-6-102(a)(1)-(4) is necessary, the Reporters Committee urges that Proposed Rule 20B be revised to delineate the circumstances in which certain identifying and medical information may be available for public inspection—that is, filed without redaction—pursuant to Tennessee law.

II. Constitutional Issues with Proposed Rule 20B.

While Proposed Rule 20B does not reference any particular source of law that creates a right of access to court records, the First Amendment to the U.S. Constitution and Article I, Sections 17 and 19 of the Tennessee Constitution provide for such a right. *See Press-Enterprise Co. v. Superior Ct. of Calif. for Riverside Cnty* ("*Press-Enterprise II*"), 478 U.S. 1, 9 (1986) (holding that a qualified First Amendment right of access applies to criminal proceedings); *Appl. of Nat'l Broad. Co., Inc.*, 828 F.2d 340, 343–45 (6th Cir. 1987) (applying *Press- Enterprise II* in deciding that there was a First Amendment right of access to records that pertained to criminal court proceedings); *Kocher v. Bearden*, 546 S.W.3d 78, 85 (Tenn. Ct. App. 2017) (citing Article I, Section 17 for rule that judicial records are presumptively open to the public); *Knoxville News-Sentinel v. Huskey*, 982 S.W.2d 359, 362 n.3 (Tenn. Crim. App. 1998) ("Article I, Sec. 19 of the Constitution of Tennessee presumably extends a similar qualified right [of access to judicial records] to the public.").

Given this constitutional framework, Proposed Rule 20B as currently drafted raises constitutional concerns, as discussed below.

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[2] In addition, Tennessee law may require government entities to disclose protected health information ("PHI"), as defined by federal law, under certain circumstances. Tenn. Op. Atty. Gen. No. 15-48 at 3 (June 5, 2015) ("[W]hen Tennessee's Public Records Act requires a covered entity to disclose PHI, the covered entity is permitted under HIPAA's Privacy Rule to make the disclosure without running afoul of HIPAA as long as the disclosure complies with the Public Records Act.").

A. Proposed Rule 20B permits sealing if mere "good cause" is shown, which would violate the federal and state constitutional right of access.

Proposed Rule 20B states that "[f]or *good cause*, the Court may order redaction of additional information in a redacted Filing or prohibit public access to a Filing." *Id.* at 20B(3)(e) (emphasis added).

However, under the federal and state constitutional rights of access, a proponent of sealing must demonstrate that sealing is necessary to serve a ***compelling interest***, and that such sealing is ***narrowly tailored*** to serve that interest. *E.g.*, *State v. Drake*, 701 S.W.2d 604, 607 (Tenn. 1985) ("The presumption of openness may be overcome only by an overriding interest based on findings that closure is essential to preserve higher values and is narrowly tailored to serve that interest.") (citation omitted)). Indeed, the Court of Appeals has explicitly recognized that "good cause" is an inappropriately low standard to justify sealing court records. *In re Estate of Thompson*, 636 S.W.3d 1, 19 n.17 (Tenn. Ct. App. 2021) (applying compelling interest/narrow tailored standard and explaining that "many other jurisdictions apply the compelling interests, or a similar standard, when considering whether to seal public court records and a conclusion that good cause is the proper standard would be a departure from the weight of authority" (string cite omitted)).[3]

Proposed Rule 20B does not require courts to meet the heightened standard for closure pursuant to the constitutional rights of access. In instructing that information may be sealed by the Court based on a mere showing of "good cause," Proposed Rule 20B is inconsistent with the standards mandated by the federal and state constitutions.

B. Proposed Rule 20B fails to require that a court ordering a closure articulate its reasons for doing so.

While Proposed Rule 20B anticipates that courts may order the sealing or redaction of information beyond the enumerated categories, it does not require that such orders provide any explanation regarding why information is being redacted and/or sealed. This is contrary to established precedent for the issuance of sealing orders.

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[3] While the Tennessee Supreme Court applied the "good cause" standard for sealing with respect to a request involving raw discovery materials that were required to be filed in *Ballard v. Herzke*, 924 S.W. 2d 662 (Tenn. 1996), the Court of Appeals has explained that "*Ballard* is quite clearly limited to documents produced in discovery, notwithstanding the fact that in that particular case, the documents were also part of the court record and, therefore, public records," *In re Estate of Thompson*, 636 S.W.3d at 18 (citing *Ballard*, 924 S.W.2d at 662); *see also Bottorff v. Bottorff*, No. M2019-00676-COA-R3-CV, 2020 WL 2764414, at *3 (Tenn. Ct. App. Feb. 4, 2020) ("Tennessee courts have developed two methods of analysis to be applied when determining whether a trial court can properly order that these two categories of documents, those produced during discovery and those produced during trial, remain sealed." (citing *Ballard*, 924 S.W.2d at 659; *Kocher I*, 546 S.W.3d at 86)). Good cause is not the proper standard for the sealing of ordinary legal filings.

When ordering that court records be sealed—or even redacted—a court is required to provide a detailed explanation of the reasons for the order. The Tennessee Supreme Court's decision in *Drake* explained in no uncertain terms that when a closure order is issued the court must "make findings adequate to support the closure" and "shall articulate specific facts upon which [the court] has based a finding that closure is essential to preserve the moving party's interest and his findings that no alternatives to closure will adequately protect that interest." 701 S.W.2d at 608; *see also Shane Grp., Inc. v. Blue Cross Blue Shield*, 825 F.3d 299, 306 (6th Cir. 2016) ("[A] court's failure to set forth those reasons—as to why the interests in support of nondisclosure are compelling, why the interests support access are less so, and why the seal itself is no broader than necessary—is itself grounds to vacate an order to seal." (citations omitted)).

Proposed Rule 20B does not establish whether a court need provide any explanation when ordering additional information to be redacted or sealed. *Id.* at 20B(3)(e) (providing only that a court may order redaction or restrict access if "good cause" is found). Given that Proposed Rule 20B would permit courts to issue closure orders, it should also mandate that such orders articulate findings to justify any closure, per the constitutional framework detailed above.

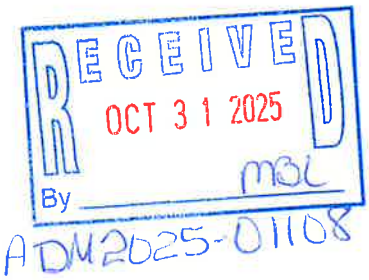
The Reporters Committee recommends Proposed Rule 20B be modified to ensure it complies with the constitutional rights of access pursuant to the First Amendment and Tennessee Constitution.

Conclusion

The Reporters Committee appreciates the opportunity to bring the aforementioned issues to the attention of the Court and would be pleased to provide any additional information to the Court upon request. Please do not hesitate to contact Reporters Committee Senior Staff Attorney Paul McAdoo (pmcadoo@rcfp.org) with any questions.

Sincerely,

Reporters Committee for
Freedom of the Press



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October 31, 2025

By Email: appellatecourtclerk@tncourts.gov

James Hivner, Clerk of Appellate Courts
Tennessee Supreme Court
100 Supreme Court Building
401 Seventh Avenue North
Nashville, TN 37219-1407

Re: ADM 2025-001108

Dear Mr. Hivner:

Pursuant to the Tennessee Supreme Court's Order referenced above, the Knoxville Bar Association ("KBA") Professionalism Committee ("Committee") carefully considered the amendments to the Tennessee Rules of Appellate, Civil, and Criminal Procedure proposed by the Advisory Commission that are attached to the Order. The Committee presented a report with its recommendation on the proposed amendments at the October 22, 2025 meeting of the KBA Board of Governors (the "KBA Board"). After consideration, the KBA Board submits the following comment on one aspect of the proposed amendment to Rule 41(g) of the Tennessee Rules of Criminal Procedure, namely, in which courts motions for return of seized property are to be filed.

The KBA supports amending Rule 41(g) of the Tennessee Rules of Criminal Procedure to clarify which courts may hear motions for return of seized property. The proposed amendment provides that a motion for return of seized property "must be filed with the Circuit Court in the judicial district where the search warrant was issued or the Circuit Court with jurisdiction over the place where the property was seized."

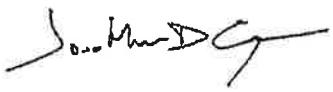
In the KBA's view, that language may cause some question or confusion in jurisdictions, like Knox County, that have a separate Criminal Court. Even if "Criminal Court" is technically Circuit Court, litigants and clerks in jurisdictions with a Criminal Court may interpret the rule to require that a motion for return of seized property be filed in a Circuit Court.

Also, there could be benefits to permitting a motion for return of seized property to be filed in a Sessions Court handling a related criminal case. The Sessions judge in the case may already be familiar with the matter. In addition, allowing the motion to be filed before a Sessions judge could be beneficial in jurisdictions where Circuit judges are not sitting all the time.

Based on these considerations, the KBA respectfully suggests that the second sentence of proposed Rule 41(g)(2) be replaced as follows: "The motion must be filed in the Circuit Court, Criminal Court, or Sessions Court in the judicial district where the search warrant was issued, where the property was seized, or where a related criminal case was or is pending."

As always, the KBA appreciates the invitation to consider and comment on proposed rules changes.

Sincerely,



Jonathan D. Cooper, President
Knoxville Bar Association

cc: Tasha C. Blakney, KBA Executive Director (via email)
Executive Committee of the Knoxville Bar Association

IN THE SUPREME COURT OF TENNESSEE
AT NASHVILLE

IN RE: AMENDMENTS TO TENNESSEE RULES OF APPELLATE PROCEDURE, CIVIL PROCEDURE AND CRIMINAL PROCEDURE

No. ADM2025-~~0118~~ 01108 – Filed: August 22, 2025

RESPONSE TO INVITATION FOR PUBLIC COMMENT

In response to the proposed addition of Rule 20B to the Tennessee Rules of Appellate Procedure, as part of the Court's 2026 Rules Package, the Executive Committee of the Tennessee District Public Defenders Conference ("Conference"), expresses concerns with the redaction requirements in the proposed amendment.

I. REDACTION REQUIREMENTS IN PROPOSED AMENDMENT TO TENNESSEE RULES OF APPELLATE PROCEDURE

The Conference has concerns with several of the items listed as "confidential information" that would be required to be redacted from appellate filings. In particular, subsection (2)(d), subdivision,

> (v) names of persons known to be minors;
>
> (vi) case numbers of confidential, expunged, or sealed records in cases other than the one in which the Filing is made;
>
> (vii) information identifying a person receiving mental health or substance use-disorder services;
>
> (viii) information identifying victims of sexual offenses;

(ix) medical information the confidentiality of which is protected by Tennessee or federal law; and

(x) records of students in education institutions the confidentiality of which records is protected by Tennessee or federal law.

First, it is already common practice in the appellate courts to identify victims of sexual offenses by their initials. Is the terminology "information identifying victims of sexual offenses" intended to be broader than current practice? If so, how will an appellate attorney determine how much information is necessary to avoid identification of a victim, particularly in a case originating from a small rural jurisdiction? Will appellate attorneys be required to redact all names in a sex offense brief? Will appellate attorneys be required to redact the city, county, and other location information from the captions, statements of the case, and/or statements of facts in appellate briefs? It is unclear from the plain language of the rule the scope of information that would need to be redacted. Relatedly, appellate attorneys may not have sufficient information in the record to ascertain whether a person named in an appellate brief is a minor. There may be cases where it will be impossible to know if a person is a minor and, therefore, impossible to know whether redaction of a person's name is required by the proposed rule. To avoid improper identification of minors and victims of sexual offenses, more clarification is needed to advise appellate attorneys about the scope of redaction required by the proposed new rule in subdivisions (2)(d)(v) and (viii).

Second, public defenders routinely have clients who are receiving mental health or substance use disorder services, or who did receive such services at one time. Those services and a client's responsiveness to them are routinely the subject of sentencing and probation appeals. There are numerous instances in which the only issue raised on appeal by a public defender concerns the mental health or substance use disorder of the client. How would a public defender

redact a filing properly in which the sole issue is that matter? Would the proper avenue be to always file such a brief under seal? Or is the intent of the rule to protect all persons other than criminal defendants from such disclosure of mental health and substance-use disorder services? If the rule is not intended to protect criminal defendants, it is unclear how an appellate attorney is expected to know whether any other person who may be identified in the brief is someone who is receiving mental health or substance-use disorder services, unless the person so states on the record, and that statement is relevant to the appeal. For example, it may be necessary to discuss an alleged victim's self-reported mental health needs and related services when challenging a victim impact statement related to sentencing in a criminal case. Would all such references need to be redacted from an appellate brief? Again, is the better practice to simply file all briefs involving mental health and substance-use disorders under seal? To avoid over-redaction or filing too many briefs under seal, more clarification is needed to advise appellate attorneys about the scope of redaction required by the proposed new rule in (2)(d)(vii).

Third, public defenders are not knowledgeable on the kind of medical or educational information which is or is not protected by Tennessee or federal law. Public defender clients have filed numerous sentencing appeals which depended largely on their age, education, and medical issues. More broadly, appellate attorneys in criminal cases may not know whether certain information is protected by federal or state law or whether certain information has been obtained from a case that was itself confidential, expunged, or sealed. Considering the potential for sanctions if a brief is not properly redacted or filed, more clarification is necessary to ensure that appellate attorneys can act in good faith without fear of punishment due to a failure or inability to comprehend the intended scope of the proposed new rules in (2)(d)(vi), (ix), and (x).

As a final comment, the Conference expresses its concern that the proposed new rules will likely have the effect, intended or not, of requiring significant redaction or sealed briefs in a large number of criminal appeals. In addition, the Conference questions the necessity of requiring the high level of redaction that appears to be contemplated by these proposed new rules if the same rules will not be applied to the opinions published by the appellate courts. Even if appellate attorneys expend the significant additional time and resources that will be necessary to comply with the proposed rules, redacting confidential information from the appellate briefs will not protect the information from public disclosure if appellate court opinions continue to be published without redaction on the public AOC website, Westlaw, and other online sources.

II. CONCLUSION

This comment is not all inclusive but represents some of the more obvious issues for public defenders under the proposed rule. The Conference respectfully expresses its concerns that the proposed addition to the Tennessee Rules of Appellate Procedure will lead to confusion and unnecessary work for public defenders and other appellate attorneys.

Respectfully submitted,

Tennessee District Public Defenders Conference

By: 

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RAYBIN & WEISSMAN, P.C.
ATTORNEYS AT LAW
David L. Raybin | David J. Weissman | Benjamin K. Raybin

August 28, 2025

James Hivner, Clerk
Via email: appellatecourtclerk@tncourts.gov

Re: 2026 Rules Package (Tenn. R. Crim. P. 41)

Dear Mr. Hivner:

This is a comment in support of the proposed amendment to Tenn. R. Crim. P. 41, which expands the ability to move to suppress and return unlawfully seized property, with one small suggested modification.

The amended rule would have significantly assisted with a case I had which received some media attention and has been fully adjudicated (and thus will not come before the Court). My client had several birds of prey which she maintained for her business as a falconer and educator. Officers with the TWRA, under a misguided belief she had committed regulatory violations, obtained a search warrant to physically seize all her birds. However, since no criminal charges were filed at that time, I concluded we had no vehicle to challenge the seizure in state court. I met with the District Attorney's Office to ask them to immediately bring charges or else return the birds, but even then it was months until criminal summonses were issued.

As soon as my client had an open criminal case, I promptly filed a motion to suppress. When the motion was finally heard weeks later, the judge agreed the birds were illegally seized and ordered their return. A dismissal of the criminal charges followed soon afterwards. Unfortunately, during the six months the birds were seized, one died and several developed permanent disabilities, and my client's business was devastated. We subsequently filed a federal civil rights lawsuit and obtained a significant settlement from the State.

The proposed amended Rule would have allowed us to immediately file a motion to suppress and prevented the bulk of harm caused by the illegal seizure. I thus strongly support the amendment and appreciate the Court's action in fixing this gap in Tennessee law.

My only suggestion is to change "Circuit Court" in the proposed section (g)(2) to "Circuit or Criminal Court" to clarify that a motion can be filed in either court in judicial districts with separate courts of record. The Advisory Commission Comments to Rule 41 state in part: "The motion under subdivision (g) is meant to apply only to courts of record of general criminal trial jurisdiction such as Circuit and Criminal Court." The original intent of the Rule was certainly to

encompass both. However, by listing only one, there could be confusion about whether a motion in the other is proper.

RAYBIN & WEISSMAN, P.C.

Ben Raybin

Benjamin K. Raybin

Kim Meador

From: Ben Raybin <braybin@nashvilletnlaw.com>
Sent: Thursday, August 28, 2025 1:43 PM
To: appellatecourtclerk
Subject: Comment on 2026 Rules Package (Tenn. R. Crim. P. 41)
Attachments: Ltr to Clerk re Rule Amendment 8-28-25.pdf

Please see attached a comment on the proposed amendment to Tenn. R. Crim. P. 41 in the 2026 Rules Package.

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Kim Meador

From: Myers Morton <Myers.Morton@knoxcounty.org>
Sent: Wednesday, August 27, 2025 7:36 PM
To: appellatecourtclerk
Subject: Proposed Rule Changes

Thank you for the opportunity to comment.

Rule 20B includes the following provisions:

"(7) Liability. This Rule does not create any right of action against the Appellate Courts or the Clerk or their respective members, employees, or agencies, nor does it affect any immunity or defense to which a Court or the Clerk, or their respective members, employees, or agencies may be entitled."

What about liability of lawyers making a mistake and erroneously failing to redact confidential information? Does this rule create a cause of action? Is it negligence per se?

Will this make the court of appeals' judges and clerks witnesses? And your record evidence?

Also, the governmental tort liability act covers "servants" in the definition of "employee."

(2) "Employee" means and includes any official (whether elected or appointed), officer, employee or servant, or any member of any board, agency, or commission (whether compensated or not), or any officer, employee or servant thereof, of a governmental entity, including the sheriff and the sheriff's employees and, further including regular members of voluntary or auxiliary firefighting, police, or emergency assistance organizations;
T.C.A. § 29-20-102 (Lexis Advance through the 2025 Regular Session)

What about your bailiffs?

Thank you.

Myers Morton