

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

D. PULANE LUCAS, MBA, MTS, Ph.D.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No: _____
	)	
WILLIAM H. LEIGHTY	)	
SERVE: 3205 D Stony Point Road	)	
Richmond, VA 23235	)	
	)	
Defendant.	)	

Plaintiff D. Pulane Lucas, MBA, MTS, Ph.D. (“Plaintiff” or “Dr. Lucas”), by counsel, states as follows for her Complaint against defendant William H. Leighty.

1. This is an action for defamation. In March of 2025, Leighty was fired from his position at the L. Douglas Wilder School of Government and Public Affairs at Virginia Commonwealth University (“VCU”). The firing was abrupt and apparently stemmed from Leighty’s refusal to ask Richmond Mayor Danny Avula certain questions during a virtual question-and-answer session. Former Virginia Governor L. Douglas Wilder, through an intermediary, sent the questions to Leighty, and Leighty believed he was fired because he angered the former Governor. He publicly stated: “The bottom line is Doug Wilder uses the Wilder School as his perch to throw slings and arrows at people who he thinks don’t agree with him or don’t like what he has to say.”<sup>1</sup>

1

2. On August 25, 2025, however, Leighty threw his own slings and arrows. Specifically, on that date, without giving Dr. Lucas any advance notice, Leighty sent an unsolicited two-page letter attacking her to Todd Haymore, the Rector of the Board of Visitors of Virginia Commonwealth University ("VCU"), and Dr. Beverly Warren, VCU's interim Provost, with copies also sent to the presidents of VCU's Faculty Senate and Student Government Association. He also e-mailed it to more than 100 VCU employees. A copy of the letter is attached as **Exhibit A**.

3. While Leighty's letter claimed to raise issues "involving academic freedom and the integrity of the Wilder School," in reality, it was a gratuitous effort to disparage the character and integrity of Dr. Lucas, who took over the VCU class Leighty had been teaching when he was fired. Even though he had no first-hand knowledge of any events or statements occurring in Dr. Lucas's new class, Leighty tried to make himself look good at his successor's expense, writing: (i) Dr. Lucas "upon taking over the class . . . announced 'Public Administration is so boring'; (ii) students were "shocked and dismayed" at the announcement; (iii) Dr. Lucas announced that the textbook for the course was "terrible"; (iv) Dr. Lucas used the students in the class to help "support the curriculum for her Policy Pathways, Inc. summer academy" (her own professional organization); (v) students had concerns that a class project given by Dr. Lucas was "not an educational exercise but was designed to support [Dr. Lucas'] professional work"; and (vi) "the very first assigned project was titled 'Trailblazer Tails: The legacy of L. Douglas Wilder' which was described as "developing curriculum for "Teaching elementary school children about Gov. L. Douglas Wilder." According to Leighty, whose statements above implied an improper and unethical conflicts of interest for Dr. Lucas, "this information . . . **does not reflect well on the school.**" (emphasis added).

4. Just as harmful, Leighty implied that Dr. Lucas had an intimate relationship with Gov. Wilder and that this relationship is the reason she got the job in the first place. In his letter, Leighty wrote: (i) "Dr. Lucas revealed that she has known Governor Wilder since the time he was Lieutenant Governor of Virginia and met with him again in Oakland, California after he was elected governor"; and (ii) "It concerns me that Dr. Lucas's longstanding relationship with Doug Wilder may have factored into the rationale for her hiring and my departure." *Id.* (emphasis added). Leighty had no contact at all with Dr. Lucas prior to making these accusations.

5. Leighty's letter is false and defamatory. Dr. Lucas never disparaged public administration as a topic in her class, nor did she belittle the class textbook. As well, none of Dr. Lucas' students voiced concerns, much less said they were "shocked or dismayed," when she made comments similar (but not identical) to those referenced by Leighty. Indeed, Leighty's negative characterization of Dr. Lucas's statements -- for which, again, he has no first-hand knowledge -- is false and grossly lacking in context. Further, Dr. Lucas's curriculum choices were not designed to advance her own personal work for her organization, and, in fact, she hewed to Leighty's own prior syllabus in many ways. Nor did anything Dr. Lucas do as part of her teaching at VCU constitute an implicit or explicit conflict of interest or other inappropriate conduct at the University. Finally, Dr. Lucas does not have, and never has had, a "longstanding relationship" of any kind with former Governor Wilder, and she did not get her job at VCU because of Wilder.

6. In short, Leighty's characterizations of Dr. Lucas were made to advance his own self-serving narrative that Dr. Lucas is not qualified to teach his former class and is otherwise a toady of former Governor Wilder. This narrative is false and defamatory, and Dr. Lucas now brings this lawsuit to hold Leighty liable for his unlawful conduct.

## **PARTIES**

7. Dr. Lucas is an individual resident of Henrico County, Virginia.
8. Defendant Leighty is an individual resident of Richmond, Virginia.

## **JURISDICTION AND VENUE**

9. Personal and subject matter jurisdiction are proper in this Court pursuant to, among other things, Va. Code § 8.01-328.1(A)(4) and the common law of Virginia.
10. Venue is proper in this Court on various grounds, including (i) pursuant to Va. Code § 8.01-262(1), because Leighty resides in the City of Richmond; and (ii) pursuant to Va. Code § 8.01-262(4), because the cause of action stated herein, or any part thereof, arose within the City of Richmond since the defamatory letter was published primarily, if not exclusively, in the City of Richmond.

## **FACTUAL BACKGROUND**

### **A. DR. LUCAS' RELEVANT BACKGROUND.**

11. Dr. Lucas is a professor, author, speaker, and entrepreneur. She holds a Ph.D. in Public Policy and Administration (Health Policy Concentration) from VCU, a Master of Arts degree from Harvard University, a Master of Theological Studies degree from Harvard Divinity School, and an MBA from Harvard Business School. Dr. Lucas completed her undergraduate studies at California State University, East Bay.
12. For eleven years, Dr. Lucas served on the faculty at Reynolds Community College, where she taught business and economics courses. There, she held the title of Associate Professor (Adjunct) in the School of Business. Dr. Lucas worked in that position until she was hired in March 2025 to serve an adjunct faculty member at VCU's L. Douglas Wilder School of Government and Public Affairs (the "Wilder School").

13. Dr. Lucas also is the President and CEO of Policy Pathways, Inc. ("Policy Pathways"), a non-partisan 501 (c) (3) tax-exempt non-profit organization committed to providing educational programming and developmental activities for youth and young adults who are interested in policy-related studies, public administration, and public service leadership.

**B. DR. LUCAS' LIMITED INTERACTIONS WITH FORMER GOVERNOR WILDER.**

14. Dr. Lucas is proud to say that one of her key inspirations for working in the area of public policy, especially as an African-American, is former Governor Wilder.

15. Dr. Lucas first met then-Lt. Governor Wilder back in the 1980's while she was interning with the Oakland, CA City Council. At that time, Wilder was the keynote speaker for a program Dr. Lucas was attending. Dr. Lucas spoke with Wilder at that time and was impressed by his knowledge, charisma, and courage. She was particularly impressed by the fact that he was the first African-American elected to statewide office in Virginia.

16. Dr. Lucas met Wilder again a few years later, also in Oakland, CA. At that time, Wilder was now the Governor of Virginia, and Dr. Lucas was again able to speak with him at the time.

17. Dr. Lucas' interactions with Wilder were and are limited solely to these two interactions and a few subsequent brief public professional interactions at gatherings, such as conferences and galas. Wilder did not even know that Dr. Lucas was a student at the Wilder School in the PhD program until years after she had graduated in 2013.

18. Indeed, Dr. Lucas had no contact or interactions at all with Wilder from 1993 to 2020. And even then, Dr. Lucas' contact with Wilder was limited to inquiring whether he would be available to be honored by Policy Pathways at its 2020 Fall Celebration. After Dr. Lucas's initial outreach to Wilder, all communications related to arranging Wilder's

attendance at the event occurred through his secretary, Angelica E. Bega.

19. Further, at no time has Dr. Lucas ever had any kind of personal, intimate, or sexual relationship with Wilder, longstanding or otherwise.

**C. LEIGHTY'S RELEVANT BACKGROUND.**

20. Leighty is a prominent figure in Virginia state government. Over the course of a nearly 30 year-long career in public service, Leighty served as Chief of Staff to Governors Mark Warner and Tim Kaine, Deputy Secretary of Transportation and Public Safety, Deputy Commissioner of the Department of Motor Vehicles, and Director of the Virginia Retirement System.

21. After his retirement from public service, Leighty released a memoir entitled *Capitol Secrets: Leadership Wisdom from a Lifetime of Public Service*.

**D. VCU ABRUPTLY AND WITHOUT WARNING FIRES LEIGHTY.**

22. At all relevant times prior to March 21, 2025, Leighty was employed by VCU as an adjunct faculty member serving in a teaching and advisory role. Among his VCU duties, Leighty taught a graduate-level Public Administration class (PADM 601-901) in VCU's L. Douglas Wilder School of Government and Public Affairs.

23. On or about March 21, 2025, VCU abruptly fired Leighty.

24. According to Leighty, VCU fired him because he refused to ask Richmond Mayor Danny Avula certain questions submitted by former Governor Wilder during the question-and-answer session of a "Lunch and Learn" event on March 19, 2025.<sup>2</sup>

---

<sup>2</sup> <https://virginiapoliticalnewsletter.substack.com/p/leighty-was-fired-by-vcu> (visited on November 4, 2025).



25. Apparently, Wilder was so upset at Leighty's refusal to ask the questions at issue that he pressured VCU to fire Leighty two days later.

26. On the day of his firing, Leighty lamented his sudden termination in a Facebook post. While his post purported to provide context about the "Lunch and Learn" event that preceded his termination, Leighty also talked about his public administration class. Among other things, Leighty wrote:

It saddens me that my 44 graduate (Masters of Public Administration) students in two separate classes **will be left abandoned mid-semester with graduation only weeks away.**

...

I feel deeply sorry for the students that are being impacted by this action. Completing a graduate degree is stressful enough without the introduction of avoidable and unnecessary distractions.

Facebook post (emphasis added).<sup>3</sup>

#### E. DR. LUCAS TAKES OVER LEIGHTY'S PUBLIC ADMINISTRATION CLASS.

27. Days after VCU terminated Leighty, it hired Dr. Lucas to teach his PADM 601-901 class.

28. At no time during the hiring process did Dr. Lucas speak to, or about, Wilder. Instead, the hiring process was initiated by Dean Susan T. Gooden, the Dean of the Wilder School, almost immediately after VCU fired Leighty.

29. In teaching the Public Administration class, Dr. Lucas relied on, and used, Leighty's initial syllabus for the class. She also retained all of Leighty's reading assignments from the primary class textbook for the remaining classes.

---

<sup>3</sup> <https://bluevirginia.us/2025/03/william-leighty-former-chief-of-staff-to-governors-mark-warner-and-tim-kaine-summarily-fired-by-vcu-school-of-government-apparently-because-he-refused-to-ask-a-question-demanded-by-doug-wilder/> (visited on November 7, 2025).

30. As well, Dr. Lucas kept in place the guest lecturer (Dr. Nakenia Douglas Glenn, Executive Director of RISE<sup>4</sup>) that Leighty had scheduled to speak to the class on April 3, 2025, to discuss the topic of “Leadership.”

31. As is to be expected, however, Dr. Lucas, as the new head of the class, made certain changes for the class.

32. First, bringing her own experiences to the classroom, Dr. Lucas incorporated several projects – known as “Capstone Projects” – into the curriculum. These projects, while initially developed by Dr. Lucas as part of her work with Policy Pathways, were designed and intended to complement and work in connection with the already existing curriculum for the PADM 601-901 class.

33. Second, Dr. Lucas removed the requirement that the students read excerpts from Leighty’s *Capitol Secrets* book – including the assignment on March 27, 2025 to reread the book’s chapter on “Becoming Chief of Staff” – for the remaining classes<sup>5</sup>.

34. And third, Dr. Lucas had someone other than Leighty’s initially-slated guest lecturer come to speak to the class on April 24, 2025

35. In terms of her teaching style, Dr. Lucas is, and always has been, gregarious, engaging, and colloquial with her students. To that end, when she teaches her classes, Dr. Lucas is often down-to-earth when discussing class topics and she frequently uses humor to stimulate her students.

---

<sup>4</sup> “RISE” refers to the Research Institute for Social Equity. <https://wilder.vcu.edu/directory/people/nakeina-douglas-glenn-phd.html> (visited on November 10, 2025).

<sup>5</sup> For the classes that preceded Dr. Lucas’ arrival, Leighty’s syllabus required the students to read at least four chapters from Leighty’s *Capitol Secrets* book, as well as an article by Leighty titled “Virginia’s Reorganization Experience.”



36. With such techniques in mind and being keenly sensitive to the fact that she was taking over a class that had been taught by a different instructor<sup>6</sup>, Dr. Lucas opened her first class by reflecting back on when *she* had taken public administration courses. In doing so, she commented that just teaching solely from a textbook during a 7:00 p.m. class would be “so boring.” Instead, Dr. Lucas explained that, while she would still be using the textbook, she would also be integrating case studies so that the class would be interactive.

37. At no time did Dr. Lucas, directly or indirectly, call the topic or subject matter “so boring,” nor did she otherwise disparage the subject matter in general or Leighty specifically. To the contrary, in that first class, Dr. Lucas said that *she* found the topic very interesting, and she hoped her students would too. Indeed, Dr. Lucas loves the topics of public policy and public administration, so much so that after earning her Ph.D. in the field, she committed her life to providing early insights into the field through her non-profit. Lucas’s goal is to prepare students (of all ages) to succeed in and become leaders in the area of public policy and public administration.

38. Likewise, Dr. Lucas said that the main textbook for the class – *Introducing Public Administration*, 9<sup>th</sup> Edition, by Jay Shafritz, et al. – would be aligned with case studies that she had selected which studies would correspond with chapters the book. At no time, however, did she say or imply that the book was “terrible,” especially not in the sense of being “bad” or “extremely poor quality.”<sup>7</sup> Nor did she disparage the importance of the book for purposes of using it for the class. To the contrary, Dr. Lucas indicated to the class that the textbook was a valuable source of information about the topic.

---

<sup>6</sup>

<sup>7</sup> <https://www.merriam-webster.com/dictionary/terrible> (visited on November 10, 2025).

**F. LEIGHTY DISTRIBUTES HIS UNPROVOKED ATTACK E-MAIL**

39. Unbeknownst to Dr. Lucas, during the same time she had been teaching the PADM 601-901 class and even for the time period thereafter, Leighty had apparently been harboring deep and unresolved resentment towards VCU and Wilder regarding his abrupt termination from VCU.

40. Leighty's resentment was on public display for the Richmond community in August of 2025 when a *Richmonder* article about Wilder prominently featured quotes from Leighty.

41. The August 5, 2025 article, titled "*VCU hires law firm to prove workplace issues at Wilder School*"<sup>8</sup>, primarily discussed events about to a lawsuit that Wilder had just filed against VCU. In the suit, Wilder claimed that VCU's commencement of an investigation into hostile work environment allegations at the Wilder School – which appeared to target him and his possible connection to Leighty's abrupt termination by VCU -- was a violation of his free speech and due process rights. *Id.*

42. The article, however, also included statements from Leighty, who commented on Wilder's lawsuit as follows:

"It's a bit ironic that his complaint mirrors the concerns I had about my firing," Leighty said when asked about the former governor's lawsuit. "What happened to **my** free speech rights and **my** due process rights?"

*Id.* (emphasis added).

43. Leighty's public gripes mirrored those that he separately voiced to the VCU Board of Visitors and its President and his former VCU Wilder School colleagues at around the same time.

---

<sup>8</sup> <https://www.richmonder.org/vcu-hires-law-firm-to-probe-workplace-issues-at-wilder-school/> (visited on November 10, 2025)

44. Specifically, on or about August 25, 2025, Leighty sent an e-mail to more than 100 VCU employees, including Dean Gooden and Wilder. It was addressed "Dear former colleagues" and did not include Dr. Lucas. A copy is attached as **Exhibit B**.

45. In his e-mail, Leighty said that he was reaching out "for the sake of preserving academic freedom and the individual rights of all at VCU." *Id.* In reality, however, Leighty was just airing his past grievances and leveling attacks.

46. Indeed, the first thing highlighted in Leighty's e-mail is the August 5, 2025 *Richmonder* article where he is featured.

47. The second thing Leighty mentioned was a letter he sent to the VCU Rector and President. According to Leighty, the letter "details the perspective of the students at the Wilder School regarding actions several actions [sic] after [his] dismissal." *Id.* He then noted in his e-mail a "report from Wilder School students (not just my former students) that the first words to the class by the professor were "**Public administration is so boring.**" *Id.* (bold in original). Leighty followed this sentence by saying: "I leave it to you to form an opinion of the appropriateness of the actions at the Wilder School."

48. As for the letter itself (previously attached as **Exhibit A**), it too focused on Leighty's dismissal and also purported to focus on "academic freedom." However, Leighty also said his letter was raising certain "aspects" of his dismissal that involved "the integrity of the Wilder School that I believe should be brought to the board's attention."

49. The letter then contained a paragraph that read, in part:

Immediately upon my departure the Wilder School hired Dr. Pulane Lucas as my replacement. She is an adjunct professor at Reynolds Community College and has impeccable academic credentials. Several students told me that upon taking over the class, she announced "**Public Administration is so boring.**" **What a stark description to the 14 students who were beginning their journey toward obtaining their master's in public administration.** My former students told me that they were quite

shocked and dismayed. *She also announced that the textbook for the course Introduction to Public Administration, 10<sup>th</sup> edition, Shafritz, et al, was terrible.* This book is the most widely used textbook for this mandatory course and is free online.

**Exhibit A** (emphasis added).

50. The paragraph ended with the words: *"But it got worse."* *Id.* (emphasis added).

51. Leighty then followed this paragraph with two paragraphs that, in full, said:

The students were told that the work they had done in the first ten weeks would be discarded that their final grade for the course would consist of a group project that she would assign for the final four weeks of the course. She then assigned the students a series of projects that the students soon realized were designed to support the curriculum for her Policy Pathway's summer academy. Pulane is the paid President and CEO of the academy. The students were concerned that their "project" was *not an educational exercise but designed to support her professional work.* The very first assigned project was titled "Trailblazer Tails: The Legacy of L. Douglas Wilder" and described as developing curriculum for "Teaching elementary school children about Gov. L. Douglas Wilder."

It was not just the student in the class that told me the above. Several Wilder School students (that I have not taught) contacted me to also tell me the information conveyed above. One can easily surmise that this information is now in wide circulation and *does not reflect well on the school.*

**Exhibit A** (emphasis added).

52. Finally, the letter cast aspersions about *how* Dr. Lucas replaced Leighty. Leighty described his understanding that Dr. Lucas had "known Governor Wilder since the time he was Lieutenant Governor of Virginia" and then said: "It concerns me that Dr. Lucas's longstanding relationship with Doug Wilder may have factored into the rationale for her hiring and my departure." *Id.*

53. The letter, although attached to the August 25, 2025 e-mail, was apparently sent in mid-June of 2025 to the VCU Rector and President. It was also "cc'd" at that time to the Presidents of the VCU Faculty Senate and the VCU Student Government Association.

54. At no time prior to publishing either the e-mail or the letter did Leighty ever speak to, reach out, or contact Dr. Lucas to discuss any of the contents of, or statements made in, the e-mail or the letter.

**G. LEIGHTY'S E-MAIL AND LETTER ARE FALSE AND DEFAMATORY.**

55. Both Leighty's e-mail and his letter are false and defamatory.

56. The e-mail is false and defamatory as follows:

- (a) It falsely states that Dr. Lucas's "first words" to her class were "**Public Administration is so boring**" (bold in original). Dr. Lucas never made such a statement, so they were neither her "first words" nor her "words";
- (b) It falsely impugns Dr. Lucas's character and skills as an education professional, by connecting both the letter and the false statements above to alleged inappropriate conduct by Dr. Lucas. Indeed, it falsely implied inappropriate conduct by Dr. Lucas when it ominously says: "I leave it to you to form an opinion of the appropriateness of the actions at the Wilder School"; and
- (c) Its reference to "actions" at the Wilder School necessarily refers to false actions that didn't take place.

57. The letter is false and defamatory as follows:

- (a) It falsely states that "upon taking over [Leighty's former] class she [Dr. Lucas] announced "Public administration is so boring";
- (b) It falsely states that Dr. Lucas announced that the textbook was "terrible";
- (c) It falsely implies that Dr. Lucas' class projects for her class were not educational exercises and were only for her own personal purposes; implying both a professional and personal conflict of interest in her curriculum and a lack of quality education;
- (d) It falsely states that the very first assigned project was titled "Trailblazer Tails: The Legacy of L. Douglas Wilder" – This was not the first project for the class;
- (e) It falsely implies that Dr. Lucas – through these false assertions about false statements made by Dr. Lucas and false actions taken by Dr. Lucas – was not qualified to teach the class she was teaching



and/or was not providing quality education to her students, especially when it connects its false allegations about Dr. Lucas with its stated concerns about the "integrity of the Wilder School." and its statements that "But it got worse" and "this information . . . does not reflect well on the school";

- (f) It falsely states that Dr. Lucas has had a "longstanding relationship" with Wilder and falsely implies that Dr. Lucas "has known" Wilder for decades. It also falsely suggests in its tone and discussion that Dr. Lucas's relationship is more than professional and is intimate and/or sexual in nature;
- (g) It falsely implies that Dr. Lucas only got her job at the Wilder School because of Wilder and/or her "relationship" with Wilder; and
- (h) It falsely attacks Dr. Lucas's professionalism and integrity as an educator by suggesting that merit and qualifications had nothing to do with her selection to replace Leighty.

#### **H. AFTERMATH.**

58. As a result of the false and defamatory statements in both the e-mail and the letter, which false and defamatory statements were widely published by Leighty, Dr. Lucas has suffered substantial emotional distress and reputation harm.

#### **COUNT I -- DEFAMATION**

59. The allegations of paragraphs 1-58 are realleged as if fully set forth herein.

60. Dr. Lucas has been defamed by the statements made and published by Leighty that are specifically referenced and set forth in paragraphs 3-4, 47-52, 56-57, and **Exhibits A and B** of the Complaint.

61. These false statements were published, and they were made with the requisite intent to defame Harrison.

62. The statements at issue are false and purport to be statements of fact, not statements of opinion.

63. Moreover, the false statements all involve the efforts of Leighty to demean and disparage Dr. Lucas and to falsely accuse her of unprofessional occupational activities, conduct that prejudices her in her profession, unfitness to perform the duties of her job and/or a lack of integrity in the performance of her duties. These statements, especially when made about the skills and profession qualifies of an educational professional such as Dr. Lucas here, constitute defamation per se.

64. As a proximate cause of the conduct of Leighty, Dr. Lucas has suffered substantial compensatory damages, including as severe mental and emotional distress, reputational harm, loss of sleep, humiliation, embarrassment, loss of time, and other damages. She is also entitled to presumed damages.

65. In addition, the false statements made about Dr. Lucas by Leighty were made intentionally, willfully, and maliciously against Dr. Lucas and with utter and conscious disregard of her rights.

66. Further, while some of the false and defamatory statements purport to be second or third-hand information being passed along by Leighty, this is no protection for Leighty, who, as a republisher of false and defamatory statements, is just as liable for them as if he himself had personally made the false and defamatory statements.

67. The false and defamatory statements about Dr. Lucas were made negligently and with reckless disregard to whether they were true or not.<sup>9</sup> Indeed, if Leighty had wanted to actually learn the truth about his false allegations about Dr. Lucas, he could have simply reached out and talked to her, which he did not do.

---

<sup>9</sup> Dr. Lucas states that she is not a public official, public figure, or limited purpose public figure and thus is only required to plead and prove negligence to maintain her defamation action here.

68. Finally, no privileges, qualified or absolute, attach to these statements, and Dr. Lucas is also entitled to punitive damages in this matter.

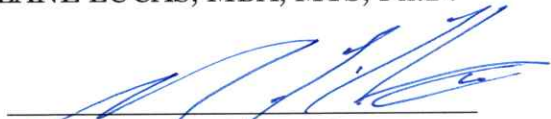
WHEREFORE, Plaintiff requests this Honorable Court to:

- a. Accept jurisdiction of this case;
- b. Award Plaintiff compensatory damages against Leighty for humiliation, mental and emotional distress, and pain and suffering that she has experienced and endured as a result of the unlawful actions of Leighty towards her. Such damages shall be in an amount not to exceed THREE MILLION DOLLARS (\$3,000,000.00), the exact amount to be determined at trial;
- c. Award Plaintiff presumed damages against Leighty in an amount not to exceed TWO MILLION DOLLARS (\$2,000,000.00), the exact amount to be determined at trial;
- d. Award Plaintiff punitive damages against Leighty in an amount not to exceed THREE HUNDRED FIFTY THOUSAND DOLLARS (\$350,000.00), the exact amount to be determined at trial;
- e. Grant Plaintiff pre-judgment and post-judgment interest on all damages awarded, to the maximum extent allowed by law;
- f. Grant such other and further relief as to the Court seems just and proper.

**A TRIAL BY JURY IS DEMANDED.**

D. PULANE LUCAS, MBA, MTS, Ph.D.

By:



Richard F. Hawkins, III  
Virginia Bar Number: 40666  
THE HAWKINS LAW FIRM, PC  
2222 Monument Avenue  
Richmond, Virginia 23220  
(804) 308-3040 (telephone)  
(804) 308-3132 (facsimile)  
Email: rhawkins@thehawkinslawfirmpc.com

Counsel for Plaintiff

William H. Leighty  
3205 D Stony Point Road  
Richmond, VA 23235

The Honorable Todd P. Haymore  
Rector, VCU Board of Visitors  
1015 Floyd Avenue  
Richmond, VA 23284

Dr. Beverly Warren  
Interim Provost, VCU  
901 W Franklin St  
Richmond, VA 23284

Dear Dr. Warren and Todd:

It has now been two months since the L. Douglas Wilder school fired me without warning and with no explanation. Even after requesting an explanation, I have had no communication, official or otherwise, as to *why* I was dismissed. As you may have seen in the press <https://www.richmonder.org/government-expert-bill-leighty-says-vcus-wilder-school-fired-him-after-dispute-over-gotcha-question-for-richmond-mayor/> and <https://www.richmonder.org/former-gov-doug-wilder-accused-ex-wilder-school-adviser-bill-leighty-of-prejudicial-conduct-before-he-was-fired-emails-show/> It is quite evident to many that former Governor Wilder's influence resulted in my firing. Yet, no one at VCU has acknowledged the specific reason for my firing.

Several senior General Assembly members have contacted me and conveyed they had approached VCU leadership expressing their dismay at how my termination was handled and were told that the VCU Board of Visitors had requested an independent review of my dismissal. If that is true, I have never been so informed by VCU. I am confident the board has many more important issues to deal with than a minor personnel issue, and therefore, I am not requesting such a review.

However, there are certain aspects of the dismissal involving academic freedom and the integrity of the Wilder School that I believe should be brought to the board's attention.

Immediately upon my departure the Wilder School hired Dr. Pulane Lucas as my replacement. She is an adjunct associate professor at Reynolds Community College and has impeccable academic credentials. Several students told me that upon taking over the class she announced, "Public Administration is so boring." What a stark description to the 14 students who were beginning their journey toward obtaining their master's in public administration. My former students told me that they were quite shocked and dismayed. She also announced that the textbook for the course *Introduction to Public Administration*, 10<sup>th</sup> edition, Shafritz et al, was terrible. This book is the most widely used textbook for this mandatory course and is free online. But it got worse.

The students were told that the work they had done in the first 10 weeks would be discarded and that their final grade for the course would consist of a group project that she would assign for the final four weeks of the course. She then assigned the students a series of projects that the



## EXHIBIT A

students quickly realized were designed to support the curriculum for her Policy Pathways, Inc. summer academy. Pulane is the paid President and CEO of the academy. The students were concerned that their "project" was not an educational exercise but designed to support her professional work. The very first assigned project was titled "Trailblazer Tails: The Legacy of L. Douglas Wilder" and described as developing curriculum for "Teaching elementary school children about Gov. L. Douglas Wilder."

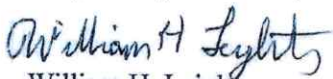
It was not just the students in the class that told me the above. Several Wilder School students (that I have not taught) contacted me to also tell me the information conveyed above. One can easily surmise that this information is now in wide circulation and does not reflect well on the school.

In a recent article published by the Wilder School, <https://wilder.vcu.edu/news-and-events/news-posts/alumni-changemaker-d-pulane-lucas-phd-paves-the-way-for-future-policy-leaders-with-policy-pathways-inc.html> Dr. Lucas revealed that she has known Governor Wilder since the time he was Lieutenant Governor of Virginia and met with him again in Oakland, California after he was elected governor.

It concerns me that Dr Lucas's longstanding relationship with Doug Wilder may have factored into the rationale for her hiring and my departure. If true, it has very strong implications for a nonacademic former politician exercising undue influence over the curriculum and operations of the school. And, if my firing was, as described in the press, a direct result of my having offended Doug Wilder by not asking a question of Mayor Avula during the March 19<sup>th</sup> forum, then it begs the question: Who is actually running the Wilder School? The dean or a politician with an agenda without educational purpose.

And finally, it is the issue of my ability as the moderator of the March 19<sup>th</sup> forum to exercise my discretion over what questions to ask. I believe, as most academics would agree, that it was fully within my academic discretion as the moderator fielding hundreds of questions simultaneously, to judge the flow of the forum and ask questions that support the learning exercise in progress and not insert an unrelated and very specific question that did not relate to conversation of the moment. To me exercising my discretion as moderator is at the core of academic freedom.

Respectfully submitted,

  
William H. Leighty

Cc: Maria C. Rivera, President, VCU Faculty Senate  
Johanna Adams, President, Student Government Association

## EXHIBIT B

From: **Bill Leighty** <[bill@billleighty.org](mailto:bill@billleighty.org)>

Date: Mon, Aug 25, 2025 at 12:13 PM

Subject: Charges of a "hostile work environment at the L. Douglas Wilder School

To: [tortoleros@vcu.edu](mailto:tortoleros@vcu.edu) <[tortoleros@vcu.edu](mailto:tortoleros@vcu.edu)>, [sneadm@vcu.edu](mailto:sneadm@vcu.edu) <[sneadm@vcu.edu](mailto:sneadm@vcu.edu)>, [smithse12@vcu.edu](mailto:smithse12@vcu.edu) <[smithse12@vcu.edu](mailto:smithse12@vcu.edu)>, [msmith43@vcu.edu](mailto:msmith43@vcu.edu) <[msmith43@vcu.edu](mailto:msmith43@vcu.edu)>, [shuttdm@vcu.edu](mailto:shuttdm@vcu.edu) <[shuttdm@vcu.edu](mailto:shuttdm@vcu.edu)>, [sanuts@vcu.edu](mailto:sanuts@vcu.edu) <[sanuts@vcu.edu](mailto:sanuts@vcu.edu)>, [ceprice@vcu.edu](mailto:ceprice@vcu.edu) <[ceprice@vcu.edu](mailto:ceprice@vcu.edu)>, [poarchch@vcu.edu](mailto:poarchch@vcu.edu) <[poarchch@vcu.edu](mailto:poarchch@vcu.edu)>, [pitchfordfa@vcu.edu](mailto:pitchfordfa@vcu.edu) <[pitchfordfa@vcu.edu](mailto:pitchfordfa@vcu.edu)>, [chpatter@vcu.edu](mailto:chpatter@vcu.edu) <[chpatter@vcu.edu](mailto:chpatter@vcu.edu)>, [wparker@vcu.edu](mailto:wparker@vcu.edu) <[wparker@vcu.edu](mailto:wparker@vcu.edu)>, [pangy@vcu.edu](mailto:pangy@vcu.edu) <[pangy@vcu.edu](mailto:pangy@vcu.edu)>, [oetjensmn@vcu.edu](mailto:oetjensmn@vcu.edu) <[oetjensmn@vcu.edu](mailto:oetjensmn@vcu.edu)>, [tfmurray@vcu.edu](mailto:tfmurray@vcu.edu) <[tfmurray@vcu.edu](mailto:tfmurray@vcu.edu)>, [kmeister@vcu.edu](mailto:kmeister@vcu.edu) <[kmeister@vcu.edu](mailto:kmeister@vcu.edu)>, [carree@vcu.edu](mailto:carree@vcu.edu) <[carree@vcu.edu](mailto:carree@vcu.edu)>, [almcgrath@vcu.edu](mailto:almcgrath@vcu.edu) <[almcgrath@vcu.edu](mailto:almcgrath@vcu.edu)>, [martintr3@vcu.edu](mailto:martintr3@vcu.edu) <[martintr3@vcu.edu](mailto:martintr3@vcu.edu)>, [belyons@vcu.edu](mailto:belyons@vcu.edu) <[belyons@vcu.edu](mailto:belyons@vcu.edu)>, [lumsdenml@vcu.edu](mailto:lumsdenml@vcu.edu) <[lumsdenml@vcu.edu](mailto:lumsdenml@vcu.edu)>, [lowensteincj@vcu.edu](mailto:lowensteincj@vcu.edu) <[lowensteincj@vcu.edu](mailto:lowensteincj@vcu.edu)>, [sakelly@vcu.edu](mailto:sakelly@vcu.edu) <[sakelly@vcu.edu](mailto:sakelly@vcu.edu)>, [jonesre22@vcu.edu](mailto:jonesre22@vcu.edu) <[jonesre22@vcu.edu](mailto:jonesre22@vcu.edu)>, [lgjones@vcu.edu](mailto:lgjones@vcu.edu) <[lgjones@vcu.edu](mailto:lgjones@vcu.edu)>, [jonesak8@vcu.edu](mailto:jonesak8@vcu.edu) <[jonesak8@vcu.edu](mailto:jonesak8@vcu.edu)>, [jacksonsk2@vcu.edu](mailto:jacksonsk2@vcu.edu) <[jacksonsk2@vcu.edu](mailto:jacksonsk2@vcu.edu)>, [hylandwj@vcu.edu](mailto:hylandwj@vcu.edu) <[hylandwj@vcu.edu](mailto:hylandwj@vcu.edu)>, [huynhkp@vcu.edu](mailto:huynhkp@vcu.edu) <[huynhkp@vcu.edu](mailto:huynhkp@vcu.edu)>, [khunter@vcu.edu](mailto:khunter@vcu.edu) <[khunter@vcu.edu](mailto:khunter@vcu.edu)>, [floydll2@vcu.edu](mailto:floydll2@vcu.edu) <[floydll2@vcu.edu](mailto:floydll2@vcu.edu)>, [davisk17@vcu.edu](mailto:davisk17@vcu.edu) <[davisk17@vcu.edu](mailto:davisk17@vcu.edu)>, [dabneytt2@vcu.edu](mailto:dabneytt2@vcu.edu) <[dabneytt2@vcu.edu](mailto:dabneytt2@vcu.edu)>, [crumpc4@vcu.edu](mailto:crumpc4@vcu.edu) <[crumpc4@vcu.edu](mailto:crumpc4@vcu.edu)>, Pam Cox <[coxp3@vcu.edu](mailto:coxp3@vcu.edu)>, Collin Cox <[coxcd@vcu.edu](mailto:coxcd@vcu.edu)>, [charbonnierj@vcu.edu](mailto:charbonnierj@vcu.edu) <[charbonnierj@vcu.edu](mailto:charbonnierj@vcu.edu)>, [carterjohnsva@vcu.edu](mailto:carterjohnsva@vcu.edu) <[carterjohnsva@vcu.edu](mailto:carterjohnsva@vcu.edu)>, [calkinsn@vcu.edu](mailto:calkinsn@vcu.edu) <[calkinsn@vcu.edu](mailto:calkinsn@vcu.edu)>, [btbryant@vcu.edu](mailto:btbryant@vcu.edu) <[btbryant@vcu.edu](mailto:btbryant@vcu.edu)>, [jburkett@vcu.edu](mailto:jburkett@vcu.edu) <[jburkett@vcu.edu](mailto:jburkett@vcu.edu)>, [browna4@vcu.edu](mailto:browna4@vcu.edu) <[browna4@vcu.edu](mailto:browna4@vcu.edu)>, [bittnermj@vcu.edu](mailto:bittnermj@vcu.edu) <[bittnermj@vcu.edu](mailto:bittnermj@vcu.edu)>, [jgalcaine@vcu.edu](mailto:jgalcaine@vcu.edu) <[jgalcaine@vcu.edu](mailto:jgalcaine@vcu.edu)>, [jsalbane@vcu.edu](mailto:jsalbane@vcu.edu) <[jsalbane@vcu.edu](mailto:jsalbane@vcu.edu)>, John Accordino <[jaccordi@vcu.edu](mailto:jaccordi@vcu.edu)>, Susan G White <[whitesg@vcu.edu](mailto:whitesg@vcu.edu)>, [frwallace@vcu.edu](mailto:frwallace@vcu.edu) <[frwallace@vcu.edu](mailto:frwallace@vcu.edu)>, [slipherd@vcu.edu](mailto:slipherd@vcu.edu) <[slipherd@vcu.edu](mailto:slipherd@vcu.edu)>, [tmodell@vcu.edu](mailto:tmodell@vcu.edu) <[tmodell@vcu.edu](mailto:tmodell@vcu.edu)>, [losapior@vcu.edu](mailto:losapior@vcu.edu) <[losapior@vcu.edu](mailto:losapior@vcu.edu)>, [doziers2@vcu.edu](mailto:doziers2@vcu.edu) <[doziers2@vcu.edu](mailto:doziers2@vcu.edu)>, [nedouglas@vcu.edu](mailto:nedouglas@vcu.edu) <[nedouglas@vcu.edu](mailto:nedouglas@vcu.edu)>, Robyn L. McDougle - Virginia Commonwealth University <[rdmcdougle@vcu.edu](mailto:rdmcdougle@vcu.edu)>, [rdmcdougle@vcu.edu](mailto:rdmcdougle@vcu.edu), [deardendm@vcu.edu](mailto:deardendm@vcu.edu) <[deardendm@vcu.edu](mailto:deardendm@vcu.edu)>, [berryjamesr@vcu.edu](mailto:berryjamesr@vcu.edu) <[berryjamesr@vcu.edu](mailto:berryjamesr@vcu.edu)>, The Honorable Doug Wilder <[ldwilder@vcu.edu](mailto:ldwilder@vcu.edu)>, Susan T. Gooden <[stgooden@vcu.edu](mailto:stgooden@vcu.edu)>, [stgooden@vcu.edu](mailto:stgooden@vcu.edu)>

Cc: Megan Pauly <[mpauly@vpm.org](mailto:mpauly@vpm.org)>, Mike Pope <[michaelleepope@gmail.com](mailto:michaelleepope@gmail.com)>, [michaelleepope@gmail.com](mailto:michaelleepope@gmail.com), [mrporter@vcu.edu](mailto:mrporter@vcu.edu) <[mrporter@vcu.edu](mailto:mrporter@vcu.edu)>

Dear former colleagues:

As the new academic year gets underway and for the sake of preserving academic freedom and the individual rights of all at VCU, I share with you two items. The first item is contained in this email, an article that appeared in *The Richmonder* on August 5<sup>th</sup>, 2025. Of particular note in the article is that **"Leighty's decision to go public with his story apparently led others to speak up, leading to a broader review of workplace issues within the Wilder School."** I have never received any contact from anyone at VCU, nor has the investigating law firm contacted me.

The second item is a copy of a letter I sent to the Rector and Provost. It details the perspective of the students at the Wilder School regarding actions several actions after my dismissal. Of note in that letter is the report from Wilder School students (not just my former students) that the first words to the class by the professor who replaced me were **"Public administration is so boring."** I leave it to you to form an opinion of the appropriateness of the actions at the Wilder School.

If you have issues regarding the operation of the school, now is the time to bring them forward.

**GRAHAM MOOMAW**

AUGUST 05, 2025 | 4:53PM EDT4 MIN

Virginia Commonwealth University has asked an outside law firm to investigate allegations of a hostile work environment within VCU's L. Douglas Wilder School of Government and Public Affairs.



The probe, being overseen by higher education attorneys with the Husch Blackwell firm, has drawn a pre-emptive legal challenge from former Gov. Doug Wilder, the former Richmond mayor and legendary Virginia political figure whom the school is named after.

Wilder revealed the existence of the "confidential investigation" by filing a federal lawsuit against VCU President Michael Rao and Chief Audit and Compliance Executive Suzanne Milton.

The goal of the suit, according to Wilder's Aug. 1 filing, is to "challenge malicious, unsubstantiated and retaliatory acts orchestrated by Defendants Michael Rao and Suzanne Milton under the guise of institutional compliance."

By launching an investigation "based on anonymous, unsubstantiated claims," Wilder contends, the VCU leaders violated his rights to free speech and due process. The former governor also claims the investigative process led to defamation against him and was brought in "retaliation" for his past criticism of Rao and VCU leadership.

The university declined to comment on Wilder's lawsuit.

"VCU would not discuss a legal matter," said university spokesman Michael Porter.

While the exact focus of the investigation is unclear, it appeared to grow out of Wilder's dispute earlier this year with former Wilder School adviser and professor Bill Leighty, according to a person familiar with the matter.

Leighty — who previously served as chief of staff to former Govs. Mark Warner and Tim Kaine — was abruptly fired in March after he moderated a virtual event with current Richmond Mayor Danny Avula. Leighty said Wilder School officials had pressured him to ask Avula a tough, VCU-related question that had come from Wilder.

Leighty didn't ask the question — which focused on an unresolved financial dispute between the city and VCU health over a botched downtown development deal — because he felt it was too aggressive for the school's event with Avula. The Wilder School terminated Leighty a few days later after Wilder [told Dean Susan Gooden](#) he found Leighty's actions "prejudicial" and intended to "follow next steps."tiff

Leighty then criticized how the Wilder School was being run, saying Wilder had been granted too much power over the school's operations and, in some cases, appeared to be weaponizing its resources against perceived foes. Leighty's decision to go public with his story apparently led others to speak up, leading to a broader look at workplace issues within the Wilder School.

"It's a bit ironic that his complaint mirrors the concerns I had about my firing," Leighty said when asked about the former governor's lawsuit. "What happened to my free speech rights and my due process rights?"

Though Wilder is a senior statesman who holds the title of distinguished professor at the school, he operates under an adjunct appointment that doesn't give him formal powers to hire or fire Wilder School instructors.

In his lawsuit, Wilder said he had asked for clarifying details on what the investigation was about. As he was being asked to make himself available for an interview with Husch Blackwell attorney Lisa Parker, the lawsuit says, Milton gave him some sense of what was being looked into.

The "vague allegations" she described, according to Wilder's suit, included claims "that there was a threatening environment at the Wilder School, an abusive relationship with Dean Susan Gooden, that I threatened colleagues, misused university personnel, and was involved in Wilder School personnel decisions."

Wilder said he did an interview on June 20 with Parker and fellow Husch Blackwell attorney Ryan Spraker, but has received no further updates on any findings or reports from the investigation.

VCU officials would not say if they expect there to be any public report on the results of the Wilder School investigation.

Wilder has continued to speak out against Rao.

Democratic lawmakers in the Virginia General Assembly made Wilder the featured guest at a news conference last month meant to push back against the perceived politicization of higher education by President Donald Trump and Gov. Glenn Youngkin.

**EXHIBIT B**

As he stood at the podium, Wilder used the occasion to call on the governor and state legislators to "withhold further funding from any public college or university, including VCU, that demonstrates gross financial mismanagement."

Calling out Rao by name, Wilder raised the issue of the failed development deal — the same disputed topic behind the Leighty controversy — and asked why state leaders aren't more interested in grappling with the tens of millions of dollars the VCU Health system lost in the process.

"Can anyone in here tell me where the money went?" Wilder said. "And why it was absolutely wasted?"

*Contact Reporter Graham Moomaw at [gmoomaw@richmonder.org](mailto:gmoomaw@richmonder.org). (VCU is a sponsor of The Richmonder, but did not influence or review this story.)*

The Richmonder is powered by your donations. For just \$9.99 a month, you can join the 1,000+ donors who are keeping quality local journalism alive in Richmond.

Respectfully submitted,

Bill Leighty

(804) 393-9401