EXHIBIT A

Williamson County Conservatives is with **Williamson County Republican Party** and **2 others**.

February 15 at 5:33 PM ·

ALERT: From the Williamson County Conservatives GOP Department of Party Efficiency

The numbers don't lie.

Under the Current Regime: Contributions to WCRP Dropped 27.55%

From May 2023 to January 2025, the Williamson County Republican Party raised $222,532.54.

At first glance this number seems impressive, but looks are often deceiving. Compared to the fundraising of their predecessors for the same time period two years before, the current regime's fundraising "achievement" is actually a failure.

From May 2021 to January 2023, the previous board of the WCRP raised $307,151.36.

Somehow as the popularity of the Republican Party grew alongside President Trump's campaign and his historic comeback win, the current regime achieved what should have been impossible in such conditions — a decrease in contributions of $84,618.82 (27.55%) to our local GOP.

Under the Current Regime: Only 12.31% of Funds Raised Went to Republican Candidates

Despite having ample cash on hand as they have been bragging about, only $27,400.00 went to Republican Nominees in Williamson County for their General Elections.

In the crucial races to put a Conservative Majority in control of the Williamson County School Board last year, the regime only gave school board candidates a meager $18,000.

Due to this failure to adequately support Republican School Board Candidates, for the first time in fifteen years a Republican lost a partisan race in Williamson County, giving Liberals a toe hold in our county.

The WCRP also withheld contributions to Republican Nominees for the Tennessee General Assembly in their races against Democrats.

Under the Current Regime: The WCRP Spent Twice as Much on Overhead as it did Helping Republicans

EXHIBIT B

From: "Williamson County Conservatives" <info@williamsoncountyconservatives.com>
Subject: Notice of Contest - Williamson County Republican Party Election Results
Date: March 9, 2025 at 10:30:38 AM CDT
To: "Scott Golden" <golden@tngop.org>
Cc: [redacted] "wcrpboard@williamsongop.org" <wcrpboard@williamsongop.org>, "office@williamsongop.org" <office@williamsongop.org>
Reply-To: "Williamson County Conservatives" <info@williamsoncountyconservatives.com>

Dear Chairman Golden,

Due to the large number and material nature of issues, irregularities, and improprieties observed at the Williamson County Republican Party Reorganization Convention of Tuesday, March 4, 2025, and that occurred prior to the Convention, per the Bylaws of the Tennessee Republican Party, Rule F, Section 1, this is our official Notice of Contest of the elections for all executive committee offices of the Williamson County Republican Party which we the undersigned were candidates.

Additionally, per Rule F, Section 2 of the Bylaws, we have copied all of the candidates whose improper election we are contesting as well as the county chairman and other county elected officials.

The grounds for this contest are numerous and straightforward. They clearly warrant immediate remedy by you as Chairman of the Tennessee Republican Party to preserve the reputation and integrity of the Republican Party not only in Williamson County but throughout our entire state.

We are certain since you were in attendance, that you can personally attest to the accuracy of the majority if not the entirely of the facts we now present to you.

1) The Williamson County Republican Party failed to Hold its Reorganizational Meeting by January 30, 2025.

Rule E, Part I, Section 3A of the Tennessee Republican Party Bylaws states that "On or before the January 15th of each odd numbered year, the County Chairman shall call a meeting of the CEC (as defined by TRP Bylaws, Article VIII, Section 3) by written notice sent at least fifteen (15) calendar days before such meeting. Such meeting (hereafter the "Reorganizational Meeting") must take place on or before January 30th of each odd numbered year."

On January 15, 2025, Chairman Tracy Miller improperly called the WCRP's Reorganizational Planning Meeting for Monday, February 3, 2025 in clear violation of Party Bylaws. When he failed to comply with the Bylaws, which also state, "If the County Chairman fails to call the Reorganizational Meeting, the State Chairman shall appoint a temporary County Chairman to carry out the procedures for reorganizing the County Party."

This did not happen and therefore the entire Reorganization Convention that was called and conducted was in complete violation of the Bylaws of the Tennessee Republican Party.

2) The Time of the Reorganization Convention was not set at the Reorganizational Meeting

Rule E, Part I, Section 3B of the Tennessee Republican Party Bylaws states "At the Reorganizational Meeting, the CEC shall fix the time, date and place for the County Reorganization Convention."

At the improperly held Reorganizational Meeting on February 3, 2025, the date of the Reorganization Convention was set for March 4, 2025 at the Factory in Franklin, Tennessee without a fixed time. Rather the time for the Reorganization Convention was stated as "To Be Determined."

A time for the Convention was not announced until over a week later, which again was a clear violation of the Tennessee Republican Party Bylaws.

3) The Place for the Reorganization Convention was not set at the Reorganizational Meeting

Per Rule E, Part I, Section 3B, of the Tennessee Republican Party Bylaws, the place of the Reorganization Convention was to be set at the Reorganizational Meeting. That place was set as the Factory in Franklin. However, after the place was fixed per the Bylaws, the Convention was moved to the Cool Springs Marriott.

There are no provisions for a County Party to move the fixed place of a Reorganization Convention within the Bylaws. Therefore, the gathering at the Cool Springs Marriott on March 4, 2025 was improper and any outcomes from any and all elections held there are null and void.

4) The Public Was Not Allowed to Attend All Meetings of the Contest and Credentials Committee

Rule E, Part 1, Section 6B6 of the Tennessee Republican Party Bylaws states that the Contest and Credentials Committee must "Allow the public to attend all of its meetings." There were multiple meetings of the Contest and Credentials Committee between February 3 and March 4, 2025 that were held in secret and the public was not allowed to attend.

These improper secret meetings clearly violate the Bylaws of Tennessee Republican Party and undermine the integrity of the credentialing process.

5) Non-Delegates Were Allowed on the Convention Floor

Rule E Part II, Section 2 of the Tennessee Republican Party Bylaws states "Only Delegates (and Alternates, if seated as a Delegate at the time) certified by the Contest and Credentials Committee are allowed on the floor of the County Reorganization Convention."

Many individuals who were not delegates were permitted on the floor of the Convention on March 4, 2025. The room in which the Convention was held had a capacity of approximately 1900 and was overflowing with people. Yet, according to unofficial vote tallies, there were approximately 1555 voting delegates in attendance. This means over 300 non-delegates were allowed on the convention floor.

Such non-delegates that were observed on the Convention Floor include but are not limited to Romonte Hamer, Matt Masters, and Sarah White.

6) Voting for Chairman and all Offices Were Improperly Conducted

The Tennessee Republican Party Bylaws, Rule E, Part II, Section 4 provides "the order of business at the County Reorganization Convention" clearly states "must be as follows." This includes holding the Chairman's election first and separately, then having the new Chairman preside over the Convention and the elections of remaining offices on the executive committee.

This did not happen. The Chairman's election was delayed and voted upon en masse with the other seven executive committee offices up for election.

Rather than holding the Chairman's election as required by the Bylaws, the Party instead allowed voting to occur throughout the Convention on a single ballot with all offices. There is no provision in the Bylaws for this change of procedure.

Furthermore, Rule E, Part II, Section 4D of the Bylaws states clearly that "The next order of business must be the election of other County Party Officers." This did not happen either.

Due to these violations of Bylaws and the improper manner of how elections for all offices were conducted by the Party, all elections held on March 4, 2025 are null and void.

7) Candidates were Not Allowed to Appoint Delegates to Observe the Vote Counting

Rule E, Part II, Section 3 of the Tennessee Republican Party Bylaws states "Each candidate for office may appoint a Delegate to observe the vote being tallied."

The Contest and Credentials Committee did not allow each candidate to have a delegate present for the vote counting. Again, this is evidence that this election was improperly conducted and is therefore null and void.

8) 137 Spoiled Ballots not Presented for Review during Recount of the Chairman's "election"

While we do not deem the Chairman's election to have been properly conducted under the Bylaws of the Tennessee Republican Party, and therefore the results of that contest are null and void, the matter of "spoiled ballots" must be brought to your attention.

We have learned 137 ballots were deemed as "spoiled" due to voter errors and allegedly "cured of their errors" before being tallied. The Party did not present these 137 ballots during the recount of the Chairman's race for inspection. As the recount was being requested, Moonhee Bischoff of the Contest and Credentials Committee was overhead telling someone regarding the spoiled ballots that "we should burn them."

These "spoiled ballots" represent 8.8% of all ballots cast and we are unable to determine if they were indeed "spoiled," accurately transcribed to new ballots, or even tabulated at the Convention. Such an error rate is unheard of in any honest election and should be investigated for the potential vote tampering.

9) Chain of Custody Breakdown

The chain of custody records for the blank ballots brought to the convention, the ballots voted on (including the 137 allegedly spoiled ballots), and the blank ballots remaining at the close of voting were never provided to any of us for inspection.

The same is true for the wrist bands issued to bona fide Republicans to vote. We were never allowed to examine the wrist bands before they were issued, count them, or record their serial numbers. Nor were any of us allowed to examine the remaining wrist bands or record their serial numbers at the close of voting.

The Party failed to provide this information to any of us, so we cannot say whether or not the number of votes cast on March 4, 2025, even matches the number of wrist bands issued, or which individuals received wrist bands to vote.

10) Improper Opening of Convention Registration and Check In

Registration and Check In for the Convention was set to begin at 4:30pm. However, the Party unilaterally decided to open the Check In process at 4:00pm without notification to any of us. Again, this was in violation of the Bylaws as a time was not fixed at the Reorganizational Meeting on February 3, 2025.

We did not learn of the early opening until 4:10 and were unable to get our Poll Watchers to the Check In tables until approximately 4:30. Debbie Deaver, the head of the Contest and Credentials Committee, in fact chased off at least one of our Poll Watchers from near the Check In tables, saying our volunteers were not allowed to observe and monitor the Check In process.

11) Improper Access to the Voting/Count Room by the Elevate Slate

One of the most secure rooms in the building should have been the very room where the votes were cast and then counted. In a grave breach of election security this was not the case.

People were seen coming and going as they pleased from the voting/count room through its exit doors. Being that there were forty voting stations and seven of us were denied the ability to have observers in the room, we cannot say whether or not anyone voted more than once, voted who should not have, or removed ballots from the room.

Additionally, Mary Smith and Barbara Sturgeon, two vocal supporters of our opponents, were working in the voting/count room. They should have been precluded due to their actual bias in the outcome of the election. Additionally, not one of our supporters was allowed to volunteer to assist in the voting/count room or in the Convention in any capacity.

12) Bona Fide Republicans Denied their Right to Vote

Individuals working the Check In and registration tables (all who supported our opponents) improperly turned away Bona Fide Republicans and did not allow them to vote.

The Party had an affirmative a duty to allow these voters to appeal the denial of bona fide status and examine their voting records. These appeals did not happen.
Additionally, bona fide voters already standing in the Check In line at 6:00pm when Check In closes, were supposed to be deemed on time, allowed to check in, and vote. The Williamson County Republican Party had advertised and posted on its social media accounts that anyone in line at 6:00pm would be allowed to check in.

Instead, when the Party closed Check In at 6:00 pm, those already in line were not allowed to Check In and were denied their right to vote. One individual has told us that he was in line before 6:00 pm, the

line moved slowly, and by the time he got to the table it was 6:02pm. He was told he was late and was ineligible to participate in the Reorganization Convention.

Remedies

We believe there is more than enough evidence of gross violations of the Bylaws of the Tennessee Republican Party and basic election security for you to deem the improper elections held at the Williamson County Republican Party Reorganization Convention on March 4, 2025, null and void.

That being the case, we ask that you remedy these violations by taking the following actions:

1) Immediately vacate the eight offices of the executive committee of the Williamson County Republican Party.

2) Appoint an unbiased temporary chairman to the Williamson County Republican Party.

3) That the temporary chairman call a new Reorganization Convention on or before April 15, 2025 with a completely unbiased Contest and Credentials Committee to assist the conduct of that Convention to bring the Williamson County Republican Party back into compliance with the Bylaws of the Tennessee Republican Party.

Yours truly,

Brian Clifford
Ali Adair
Drell Floyd
Patti Carroll
Michelle Sutton
Steven Tyler Giorno
Kimberly Calcote
Rob Verell

The Williamson County Conservatives

EXHIBIT C

LET'S MAKE THIS ELECTION TOO BIG TO RIG

Our opponents are trying to rig the Williamson GOP election, changing the location at the last minute to confuse you.
Just like the Democrats, our opponents are playing games. They've changed the election venue to try and suppress your vote. Don't let them.

You didn't sit out last year's election, why would you sit out this one? Who runs our county Republican Party is important, too.

WILLIAMSON COUNTY CONSERVATIVES

TRUE CONSERVATIVE APPROVED BALLOT

- ✓ Brian Clifford - Chairman
- ✓ Ali Adair - 1st Vice Chair
- ✓ Dress Floyd - 2nd Vice Chair
- ✓ Patti Carroll - 3rd Vice Chair
- ✓ Michelle Sutton - Treasurer
- ✓ Steven Tyler Giorno - Assistant Treasurer
- ✓ Kimberly Calcote - Secretary
- ✓ Rob Verell - Assistant Secretary

ELECTION DATE:
TUESDAY, MARCH 4TH
CHECK-IN: 4:30PM - 6PM

NOTE THE ADDRESS CHANGE

COOL SPRINGS MARRIOTT
700 COOL SPRINGS BLVD,
FRANKLIN, TN 37067

Register for the convention by scanning QR code

EXHIBIT D

HERE THEY GO...

Our opponents are trying to rig the Williamson GOP election, changing the location at the last minute to confuse you. Just like the Democrats, our opponents are playing games. They've changed the election venue to try and suppress your vote. Don't let them.

Register for the convention by scanning QR code or visit:
williamsoncountyconservatives.com

SHOW UP ON TUESDAY, MARCH 4TH
CHECK-IN: 4:30PM - 6PM

NOTE THE ADDRESS CHANGE

COOL SPRINGS MARRIOTT
700 COOL SPRINGS BLVD,
FRANKLIN, TN 37067

Paid for by Williamson County Conservatives, Troy Brewer, Treasurer
PO Box 680805
Franklin TN 37068

Presort Standard
U.S. Postage
PAID
Nashville, TN
Permit #861

2206 3

[redacted]

Williamson County Conservatives · Follow
1h ·

BREAKING - URGENT: Voter Suppression Alert - We Never Wanted to Have to Post This.

MAKE MARCH 4TH TOO BIG TO RIG!!!!

Have you or a loved one received an email from the Williamson County Republican Party Contests and Credentialing Committee stating that you or they are ineligible to participate in the upcoming March 4th WCRP Reorganization Convention?

If so, this could be an egregious mistake, or worse an act of voter suppression.

Please do not take that rejection as accurate until you confirm for yourself. WE CAN HELP YOU. (Continue reading to find out how)

WHAT SHOULD YOU LOOK FOR?
If you received (or receive) any communications from an anonymous party account named 2025 Credentials with the subject line Williamson County Mass Convention, it is not spam.

The email message will likely read the following or something similar:

"Thank you for pre-registering to participate in the Williamson County Republican Party Mass Convention.

Rule E of the Tennessee Republican Party requires that participants must be registered to vote and live in Williamson County and have voted in at least 3 of the last 4 most recent Statewide Republican Primaries.

Unfortunately, your voting record indicates that you do not qualify to participate.

Best regards,

Williamson County GOP Contest and Credentialing Committee"

At least two supporters of the Williamson County Conservatives ticket who are 4 of 4 bona fide Republicans have received this email. There may be more.

DID THIS HAPPEN TO YOU?
If so, please forward any email from the Williamson County Republican Party falsely claiming you or your loved one is not a bona fide Republican to us at info@williamsoncountyconservatives.com.

We will work with you to verify your bona fide status, and if you are indeed bona fide, that you can vote at the March 4th WCRP Convention.

WHAT ELSE ARE WE DOING?
We've informed the Tennessee Republican Party Chairman Scott Golden about this serious issue.

We've specifically requested that all members of the Contest and Credentials Committee be replaced with a new, unbiased committee appointed by the State Republican Party with members who do not reside in Williamson County and that are not biased towards any one candidate or another.

Considering almost the entire slate of our opponents is currently on the board seeking reelection, it's almost impossible that the committee they appointed will operate in an unbiased fashion.

Indeed, there is clear evidence of the Committee actively working against the candidates of the Williamson County Conservatives ticket.

This evidence has also been shared with Chairman Golden and the TNGOP.

We believe Chairman Golden has a legal and ethical duty to appoint a new, unbiased Committee composed of members that do not reside in Williamson County and that do not support any candidate over another.

WHAT MORE CAN BE DONE?
Your vote is very important! We need you and other bona fide Republicans to join us on Tuesday, March 4th. We have to make our victory at the Convention, in the words of President Trump, "Too big to rig!"

That's why you and every other bona fide Republican you know in Williamson County must pre-register for the WCRP Convention, get to Liberty Hall in the Factory for registration which runs 4:30pm-6pm on Tuesday, March 4th, vote for Brian Clifford for Chairman, and stay to vote for ALL of the candidates of the Williamson County Conservatives ticket.

[redacted]

The current regime is SO afraid of YOU that THEY CHANGED THE VENUE!

Do you want YOUR right to vote STOLEN? The Williamson County Conservatives ticket is the ONLY ticket that will protect YOUR right to vote and stop the Democrats. Sign up to support us at https://joinevents.co/5XP4CyKcT

What: Williamson County Republican Party Reorganization Convention

When: Tuesday, March 4th -- Check-In begins at 4:30pm and ends at 6pm.

VENUE CHANGE: COOL SPRINGS MARRIOTT - 700 Cool Springs Blvd, Franklin, TN 37067

12:21

180

[redacted]

What: Williamson County Republican Party Reorganization Convention

When: Tuesday, March 4th -- Check-In begins at 4:30pm and ends at 6pm.

VENUE CHANGE: COOL SPRINGS MARRIOTT - 700 Cool Springs Blvd, Franklin, TN 37067

OUR OPPONENTS, the current regime, vow to use the Williamson County Republican Party to STEAL YOUR VOTE -- handing the keys to Williamson County to Barack Obama, George Soros, and Hillary Clinton by canceling primary elections. Under their system, the socialist Left will pick Williamson's District Attorney, Sheriff, and Judges.

We HAVE to stop them. Vote for the Williamson County Conservatives: The ONLY Conservative Republican ticket running for the Board of the Williamson County Republican Party that will PROTECT YOUR RIGHT TO VOTE and fight the Socialist Left. Sign up to vote

Williamson County Conservatives

MASSIVE UPDATE - They are MOVING the Convention Location on March 4th to the COOL SPRINGS MARRIOTT! NEW CONVENTION DETAILS: WHERE: Cool Springs Marriott, 700 Cool Springs Blvd,...

www.facebook.com

https://www.facebook.com/share/p/1BxxwqZDnj/?mibextid=WC7FNe

EXHIBIT E

Williamson County Conservatives
35m ·

TNGOP HAS ACCEPTED THE APPEAL - Meaning it Continues

Below is an email sent out by the 8 Williamson County Conservatives ticket members:

We are pleased to share a bit of good news with you today.

Scott Golden, the Chairman of the Tennessee Republican Party, has granted us an appeal of the "election results" from the March 4th Reorganization Convention.

Chairman Golden clearly recognizes the validity of our claims about the egregious way the Convention was conducted and how the integrity of the Williamson County Republican Party election was undermined by those running it.

What Happens Now

We have a period of 10 days (this is day 9) to file our brief with the State Republican Party. The respondents will then have 7 days to answer our complaint and attempt to refute our evidence.

During this time Republican Party State Executive Committee will run a simultaneous investigation into the conduct of the WRCP and how it handled its Convention and the voting that night.

The State Executive Committee will then hear our case.

EXHIBIT F

Williamson County Conservatives @WConservatives · Mar 9

Williamson County Conservatives
@WConservatives

BREAKING:

The 8 candidates who ran as part of the Williamson County Conservatives ticket at the March 4th Reorg Convention have officially filed their Notice of Contest with the Chairman of the TNGOP and all relevant parties in accordance with the TNGOP bylaws.

We'll have more details shortly.

Let's hope the member of the Contests & Credentials Committee that - IN FRONT OF MULTIPLE WITNESSES - flippantly stated in the count room that they should burn certain ballots, Moonhee Bischoff, did not actually burn the ballots.

11:13 AM · Mar 9, 2025 · **88** Views

1

EXHIBIT G

Williamson County Republican Party 2025 Convention

Statement of Jonathan Duda
Chairman, Williamson County Election Commission

I have been asked to provide a statement on my observations as it relates to my role in the Williamson County Republican Party Convention on March 4, 2025.

By way of introduction, I serve as Chairman of the Williamson County Election Commission (WCEC). The WCEC routinely operates, upon request, elections and contests as a service for the community. Our services were requested to operate the election for the reorganization of leadership positions at the Williamson County Republican Party (WCRP) Convention held March 4, 2025.

Prior to the event, the WCEC met on several occasions with representatives of the WCEC and the Contest and Credentials Committee, including Debbie Deaver and Moonhee Bischof. We arrived at our Understandings (Understandings) of the events of the evening, and roles and responsibilities for both the WCEC, and WCRP.

Per the Understandings agreed to:

1) The responsibility and process of providing ballots (Provisioning) to individuals entitled to participate was solely the responsibility of the WCRP. It was decided that Provisioning teams of two (2) individuals would provide the ballots to each eligible participant. One Provisioning team member would cut off wrist bands of participants, verifying eligibility, and One Provisioning team member would immediately provide a participant a ballot. One Provisioning team member would be a County Commissioner, and one Provisioning team member would be a WCRP volunteer.
2) WCRP was to provide limited and controlled access to the voting area.
3) Once an individual would be provided a ballot, the WCEC would be responsible for the voting procedure.
4) The voting procedure included forty (40) stations where individuals would mark a hand-marked paper ballot, and six (6) Scanner Tabulators, where participants would cast their completed ballot.
5) Any ballots rejected by the Scanner Tabulators requiring curing of errors would be handled in a separate area, the "spoiled" ballot station, with WCEC representatives assisting voters to correct their ballot errors. Voters would turn in their ballot to the WCEC representative, who would store these ballots as "spoiled", and provide a replacement ballot for the voter to complete. Each of the 2 (two) slates of candidates provided judges to witness this procedure.
6) WCEC would provide staff and volunteers at each Scanner Tabulator to ensure voters were assisted, and voters would only cast a single vote in the Scanner Tabulator.
7) After voting was completed, all materials and artifacts of the election would become property of the WCRP. These materials will including, but not limited to: all completed ballots, any spoiled ballots, all ballots used in testing, and all result tapes from the tabulators, including "zero" tapes demonstrating the tabulators were properly setup and configured for use.

Observations of activities that deviated from agreed upon Understandings:

1) Entrance to the voting room was to be limited to those voting and controlled by the WCRP. Although there were individuals from the WCRP stationed at the entrance and exit doors, while voting was occurring, individuals not voting regularly entered and exited the room.
2) After 6PM, once doors to the event venue had closed, the WCEC inquired how many eligible participants would be voting. We were unable to be provided a specific number because it was explained that the WCRP had not tabulated how many participants were determined to be eligible.

3) The WCEC was asked by Debbie Deaver to open voting at approximately 6:15 PM, while Chairman Miller was still providing a welcome, prior to the time allotted for candidates to speak. As WCEC staff and volunteers were in place, we began accepting participants for voting.
4) Due to opening the room early for voting, Provisioning teams that provided ballots to participants did not appear to be given any instruction.
5) Initially, there were two (2) Provisioning teams. Throughout the evening, the number of Provisioning teams expanded to four (4). The additional teams did not appear to be given any instruction, which created confusion.
6) Provisioning teams each included a County Commissioner. On more than one occasion I was approached by individuals that asked why County Commissioners who had publicly endorsed or promoted the Elevate 2025 slate of candidates were permitted to provision ballots, while County Commissioners who had supported the Williamson County Conservative slate were not participating in the provisioning of ballots. I explained that the process of providing ballots to eligible participants was the sole responsibility and decision of the WCRP.
7) In at least one instance, a participant was provided two ballots by the Provisioning teams. I approached the individual and asked how they received two ballots. The individual explained that they had marked an incorrect candidate and went back to the Provisioning team, asked for another ballot, and were provided with it. This was contrary to the procedure that the WCEC had in place where individuals, who for whatever reason needed a replacement ballot, would be provided with a replacement ballot once their original ballot was turned in and "spoiled" at a station setup for that purpose. Upon taking the additional ballot from the participant, the participant was directed to the "spoiled" ballot station, where their original ballot was properly spoiled, and they received a replacement ballot. I returned the additional ballot that was provided to this participant to the Provisioning team that had issued it and explained that any spoiled ballots must be handled at the "spoiled" ballot station.

Additional Observations:

1) At the end of the election, WCEC Staff printed the result tapes from each of the Scanner Tabulators, and Administrator Chad Gray and I tabulated the results. Results reflected that 1,555 voters had voted. Tabulated results were printed and provided to Debbie Deaver, and each of the appointed representatives from each slate.
2) Once the tabulated results were completed and provided to the WCRP, the WCEC collected the materials and artifacts, including all completed ballots, unused ballots, ballots that had been spoiled and not cast, all ballots used during testing of equipment, result tapes from the tabulators from testing and the election, and the tally sheet.
3) A recount was requested by the Williamson County Conservatives slate. As the WCEC had turned over artifacts of the election to the WCRP, the WCEC did not participate in the hand-recount.

Incidents pertaining to handling of Unused Ballots and Spoiled Ballots:

1) As was agreed to with representatives of the Contest and Credentials Committee of the WCRP, once results of the contests for reorganization of leadership were announced, the WCEC provided all records and artifacts of the contests to the WCRP. These artifacts included all completed ballots, unused ballots, ballots that had been spoiled and not cast, all ballots used during testing of equipment, result tapes from the tabulators from testing and the election, and the tally sheet.

2) As we presented the artifacts to representatives of the WCRP Contest and Credentials Committee, which included approximately 1,200 unused ballots, I advised them that I recommended the unused ballots be destroyed immediately so that there would be no question as to the proper handling of these ballots. When asked in what manner, I advised that they could be shredded or burned - anything to keep them from being accessed by unauthorized individuals.

3) As to the spoiled ballots, which included approximately 140, this included a set of ballots that were from voters that required replacement ballots in order to cast their votes. As voters attempted to cast their vote, ballots that were rejected by the tabulator scanners for whatever reason were identified and these voters were immediately provided an opportunity to transfer their selections to a replacement ballot in a separate area by WCEC staff members. After replacement ballots were issued, the original ballots were spoiled and maintained under custody of the WCEC as spoiled ballots. These spoiled ballots were included in the artifacts provided to the WCRP.

Post election activity:

1) Upon reading on Social Medial that the result of hand-counting did not match the final tabulation of the Scanner Tabulators, I inspected the ballot images that had been stored by the Scanner Tabulators. In that inspection I found:
   a. Ballot ID290: A ballot recorded as an "Overvote"* by the Scanner Tabulator. Under personal inspection, it appears this ballot has been marked for both Brian Cliford and Steve Hickey. The Scanner Tabulator recorded this ballot as an Overvote, meaning neither Brian Clifford or Steve Hickey were recorded as receiving the vote. Upon visual inspection, it is clear that an initial marking for Brian Clifford was "scratched out", and a replacement checkmark for Steve Hickey was clearly marked. As a result, a hand-recount process would likely indicate an additional ballot recorded for Steve Hickey, versus the Scanner Tabulator result.
   b. Ballot ID1045 and Ballot ID1433: Each of these ballots were recorded as "Undervote"* by the Scanner Tabulator. This would occur where a ballot did not contain filled in circle selections for either candidate. Upon visual inspection, it is clear that both of these ballots do indicate marks, albeit just outside of the circle to be completed, indicating both of these ballots should be recorded for Steve Hickey. As a result, a hand-recount process would likely indicate these two (2) ballots would be recorded for Steve Hickey, versus the Scanner Tabulator result.
   c. Six (6) additional ballots recorded as "Undervotes" were also inspected. All six (6) were determined to be true "Undervotes". Meaning, neither candidate for Chairman received a vote, although other races were voted on.

** It should be noted that for contests such as this, the WCEC would not typically adjudicate, or personally inspect, Overvote and Undervotes, as that would require personal inspection of each ballot cast. The process of adjudicating ballots was not requested, or agreed upon by either WCEC or WCRP.*

Williamson County Republican Party 2025 Convention

Statement of Jonathan Duda
Chairman, Williamson County Election Commission

I provide this statement of my observations as to what I personally witnessed relative to the Willamson County Election Commission's participation at the Williamson County Republican Party Convention that occurred on March 4, 2025.

Jonathan Duda
Chairman, Williamson County Election Commission

3/18/2025
Date

EXHIBIT H

Claire Vech Reeves
Top contributor · Mar 9 ·

FYI

Williamson County Conservatives
Mar 9 ·

BREAKING:

The 8 candidates who ran as part of the Williamson County Conservatives ticket at the March 4th Reorg Convention have officially filed their Notice of Contest with the Chairman of the TNGOP and all relevant parties in accordance with the TNGOP bylaws.

We'll have more details shortly.

Let's hope the member of the Contests & Credentials Committee that - IN FRONT OF MULTIPLE WITNESSES - flippantly stated in the count room that they should burn certain ballots, Moonhee Bischoff, did not actually burn the ballots.

EXHIBIT I

WILLIAMSON COUNTY CONSERVATIVES

Good Monday morning.

We hope you didn't float away over the stormy weekend.

As we informed you last week, the Tennessee Republican Party has accepted the Notice of Contest filed by the eight candidates on the Williamson County Conservatives ticket. The Brief with supporting documentation is due on Wednesday.

The respondents will then have seven days to attempt to refute our evidence (that will be interesting), then the State Executive Committee will hear the appeal of the results for Williamson County Republican Party Reorganization Convention.

The grounds for this appeal are threefold.

1) The March 4th Reorganization Convention was called and conducted in complete violation of the bylaws of the Tennessee Republican Party.

2) Basic measures of election security and integrity were ignored, including the failure by the Party to provide the 137 allegedly spoiled ballots for review by all candidates.

3) The individuals running the WCRP Convention had actual bias in favor of the incumbent establishment slate of candidates, which under all circumstances is grounds for recusal or disqualification.

As the Brief to the Appeal is finalized and submitted this week, we are greatly appreciative of everyone who has stepped forward to provide written testimony validating the claims being made.

If you witnessed any suspicious or improper activities at the Convention and have not already done so, please email us today at Info@WilliamsonCountyConservatives.com to ensure we include your written testimony into the Brief that must be filed by Wednesday.

On that note, the names of certain individuals have surfaced since the Convention who may have had improper access to the voting center, count room, and convention floor on March 4th.

If you witnessed Chris Richards, Lisa Lennox, Bill Petty, Donna Clements, Penny Luckenhoff, Stephanie Kaskevics, Hannah Tiblier, or Nicholas Raciti in certain locations during the Convention that might be a cause concern or suspicion, please let us know immediately.

Again, thank you. Your support and assistance remains invaluable to our county and this cause.

Only working together will we be able to protect the voting rights of all Republicans in Williamson County and ensure that our County GOP does not drift further away from the conservative principles that are the foundation of the Republican Party.

EXHIBIT J

Declaration – Chris Morris

I am a member of the State Executive Committee ("SEC") for Senatorial District 28, a portion of which covers Williamson County.

I represented the SEC for the 2025 Williamson County Republican Party Reorganization Convention (the "Convention"). I personally oversaw the Convention and witnessed the
acts alleged by the self-styled Williamson County Conservatives ("WCC").

At no time did I witness any of the purported election interference alleged by the WCC.

Specifically, I affirm that:

I, along with SEC member and Vice Chair, Charlotte Kelley personally approved sixty-six (66) ***qualified participants***;

We, Steve Allbrooks, Cyndi Miller, Angie McClanahan and myself, qualified all "Young Republicans", who did not have the opportunity to vote in 3 of the 4 last Republican primaries, except for ***one***;

I was in the room when the hand recount occurred and witnessed Mr. Brian Floyd and Mr. Steve Hickey oversee the recount;

Brian Floyd was aware of the ***"137 spoiled ballots"*** which were segregated in a separate envelope, and which were appropriately excluded from the vote recount;

In my personal observation, this Convention was run in an orderly and fair manner, and I
personally witnessed no instances of election fraud, nor did I commit the same.

The foregoing is true and correct.

Chris Morris
Cell 931.478.0624

EXHIBIT K

AFFIDAVIT

The State of Tennessee)
) S.S.
County of Williamson)

I, Stephen Joseph Hickey, of Franklin, in Williamson County, Tennessee, MAKE OATH AND SAY THAT:

1. In reference to Williamson County Conservatives (WCC) claim 5 (Non Delegates were allowed on the convention floor), I was a non-voting attendee of the 2021 Williamson County Republican Party (WCRP) Reorganization Convention at the Cool Springs Convention Center at the Cool Springs Marriott. Furthermore, I believe there were numerous non-voting members at the 2023 WCRP Reorganization Convention at the Franklin Factory as well. I make this statement to stipulate that non-voting members have been allowed on the convention floor at previous conventions with no issue nor protest. In each instance, a wristband system was employed to designate who was and wasn't a voting delegate.

2. In reference to WCC claim 7 (Candidates were not allowed to appoint delegates to observe the vote counting), I take issue with the truthfulness of this claim. While no one explicitly invited me to observe the tabulation process, I asked Contest & Credentials Committee Chairwoman Debbie Deaver if I could observe the process and was permitted in the room to oversee tabulation. I did not witness any WCC candidates or representatives similarly ask for entry to observe tabulation and saw no down ballot candidates in the voting room during tabulation. This complaint appears to be an issue of not knowing one's rights in accordance with the bylaws and dissatisfaction with not being explicitly invited. From my observation, all tabulation was being handled by the contracted Williamson County Election Commission (WCEC) members. I will note that WCC surrogates praised the WCEC's actions at the convention (as noted in a post-convention Williamson Herald article), which undercuts their insinuation that the tabulation was somehow tainted.

3. In reference to WCC claim 8 (137 spoiled ballots not presented for review during recount of the chairman's election), I reject this claim as wholly false. After giving my victory speech, I was notified the WCC were contesting the election. I arrived in the voting room to witness TN-65 Representative Lee Reeves, Aaron Gulbransen, Brian Floyd (all presumed WCC surrogates) and

my opponent, Brian Clifford, standing next to the boxed ballots. The WCEC was in the process of cleaning up and had informed the Contest & Credentials Committee that their contracted work was done. All ballots, to include the 137 spoiled ballots segregated in a manila envelope, were on the table in full view of all individuals. As the WCC had requested the recount, but not indicated when they desired this to happen, I requested the recount happen immediately. Once a team of mutually agreed upon impartial volunteer counters were assembled from the TNGOP, SEC, and one county party chairman, the recount started. Mr. Clifford delegated his campaign manager, Brian Floyd, to oversee the recount on his behalf. Mr. Floyd made mention of the spoiled ballots and appeared to want to open the envelope where and while the recount was occurring. This caused me concern that these spoiled ballots could inadvertently be co-mingled with the valid ballots, so I requested the spoiled ballot envelope be moved to a separate table away from the recount. Mr. Floyd appeared to lose interest as he never returned to inspect these ballots after the recount was completed. I will further note that Mr. Floyd & Mr. Gulbransen both spoke at the March 7th WCEC meeting. Each attempted to call into question whether the voters of the spoiled ballots were disenfranchised, which would presumably delegitimize the results of the convention. I spoke after these gentlemen and clarified with the WCEC Chairman, Jonathan Duda (who oversaw the convention voting), that each voter who spoiled a ballot was offered a replacement ballot that was subsequently tabulated. Mr. Duda answered in the affirmative, thus negating the Floyd/Gulbransen tactic of questioning the validity of the election based on the 137 spoiled ballots.

STATE OF TENNESSEE

COUNTY OF WILLIAMSON

SUBSCRIBED AND SWORN TO BEFORE ME, on the 20th day of March, 2025

Signature: Lee A. King

NOTARY PUBLIC

My Commission expires: 06-06-2026

(Seal)

LEE A KING
STATE OF TENNESSEE
NOTARY PUBLIC
WILLIAMSON COUNTY

(Signature)

Stephen Joseph Hickey

EXHIBIT L

My name is Rob Sturgeon. The following is my response to the accusations made by the" Williamson County Conservative" (WCC) ticket in their challenge of the Williamson County Republican Party reorganization convention results. Specifically I will address the concerns related to access to the voting room via the exit door.

I was the sole attendant policing the exit door. I was at the exit door starting at approximately 4:30Pm and continued to restrict access through the completion of the voting. Contrary to the accusations made by the WCC there was not unrestricted access to the voting room via the exit door. In fact, I turned away many individuals and redirected them to the main room , the registration desk or the voting room entrance respectively. In the entire time I was controlling the exit door only 4 unauthorized individuals entered the voting room via the exit door. They are as follows:

1. Chris Burger entered twice. He came in both times carrying a clip board and went both times to converse with Chad Grey and/or members of the election committee. I do not know what Chris' reason for being in the room was, but he was only in the room about a minute or so each time.

2. Someone who indicated they were with the State Election committee. I asked them to vacate the room but they declined. However, they just stood by the door for several minutes and then left. They did not interact with anyone and did not get near any voting booths or machines. I believe the person was the election judge.

3. Someone came to me and said they left their umbrella. I pointed them to the back corner of the room where there umbrella was. They walked directly to it and then left immediately. I monitored them the entire time and they did not come close to any voting booths or voting machines. They were in the room less than 30 seconds.

4. Someone came to me and said they left their cell phone in the voting booth. Earlier we had found the phone and put it on the back table in the corner of the room where the election committee was situated. I directed the individual to that back table. He walked directly to the table and was there less than 15 seconds. I monitored him the entire time and he never came near the voting booths or voting machines. I believe it was Franklin Mayor Moore, but not 100% certain.

There were no other unauthorized individuals who entered the voting room via the exit door for the entire time I was tending the door. There was always a small crowd at the exit door just outside the voting room but other than the 4 individuals mentioned above no one else entered the room via the exit door. Additionally I was very diligent in ensuring that everyone exited the voting room once they voted and ensured there was no loitering in the room.

I emphatically disagree with the accusation that there was uncontrolled access to the voting room via the exit door.

Everything stated above is accurate and factual.

Rob Sturgeon

EXHIBIT M

STATEMENT OF STEPHEN GIRAUD CONCERNING THE MARCH 4, 2025 REORGANIZATION CONVENTION OF THE WILLIAMSON COUNTY REPUBLICAN PARTY

I, Stephen G. Giraud, am a resident of, and a registered and bona fide voter in, Williamson County, State of Tennessee. I do herby affirm the following to be accurate to the best of my knowledge as it pertains to my attendance as a qualified ("bona fide") participant/volunteer in the Williamson County Republican Party's (WCRP) Reorganization convention, March 4, 2025.

My official volunteer title was "Judge for Spoiled Ballots".

Chris Burger, (the WCC representative for "Judge for Spoiled Ballots"), Kevin Fuller and I (Elevate representatives) were trained at 4:30 PM on March 4th 2025 in the polling room at the Cool Springs Marriott by Jonathan Duda and Chad Gray. They were accompanied by Donna Choate and another woman (wore a pink dress), a very tall, (6'5" ish) man with broad shoulders (wore a long sleeve light blue shirt) and a tall, (6'1" ish) man (wore a long sleeve light colored shirt and balding) whose names I did not get, from the Williamson County Election Commission. Moonhee Bishoff, Kevin, Chris and myself, examined the six tabulators as Jonathan pointed out each of the "odometers" (cumulative number of votes cast for the life of the tabulator and the "trip meters" (current election votes cast) which displayed zero (0) and each empty ballot bin collector locked underneath, before the ballots started being submitted for the election.

We were told to report for duty when the last two speeches were about to be given in the convention hall with the estimated time being 7:15 pm. I saw the North set of doors to the polling room open at 6:15 pm with voters lined up to enter and I went from the convention hall door, where I was checking wristbands, directly across from the South set of doors to the polling room, to stand in my assigned post on the West side of the room. I alerted Norman Bobo, who was inside the convention hall that Cheryl Brown and others were attempting to enter the convention hall without wristbands. Once I entered the polling room, I turned back to see Cheryl and others without wristbands enter the convention hall.

There were 2 to 3 volunteers at each of 3 or 4 tables checking for bona fide (qualified) voter bracelets, cutting them off and issuing ballots at the North wall of the polling room.

Chris Burger arrived in the polling room at approximately 6:45 pm. Kevin was assigned the task of guiding voters to booths and sending voters with spoiled ballots over to me to then guide the voter to Chad Gray. He sent approximately 60 voters to me with spoiled ballots. Additionally, I sent approximately 70 voters with spoiled ballots to Chad. Chris sent approximately 10 voters with spoiled ballots to Chad. I witnessed Chad examining the spoiled ballots, depositing them in a manilla envelope that was placed on a table next to him and issuing a new ballot to each voter, directing them to sit down at the booth next to him and cast their vote, then directing the voter to the tabulators.

Some of the spoiled ballots that I witnessed had the oval bubble circled, checked, an X or a line drawn on the oval bubble.

Multiple voters smelled of alcohol and carried alcoholic drinks.

Moonhee was stationed directly in the center of the South Wall observing all activity. Kevin was stationed by the tabulators at the East wall. Chris stood at my left side at the West wall of the room, leaving his station several times.

During the tally of the votes from each of the tabulators, Chris and I were assigned a position behind a queue barrier near the computers used to collate vote totals at the Southwest corner.

Chris was on his phone reporting each of the candidates votes from each of the tabulators that was announced by Chad to Jonathan. After all tabulator totals were announced, Chris turned to me and said "it looks like your slate won with a clean sweep". I said, "it seems too close for me to call either way".

Jonathan announced that "we have the winners". Chad printed two copies of the final tally sheet, then handed one to me and one to Chris, who then left the polling room. I took my copy to a table to take a picture of the final tally sheet copy then left the polling room to join voters in the convention hall to hear the announcement of the winners.

When the recount was called for, I volunteered to be a witness when Jonathan asked for each side to provide one. Steve Hickey said to me "I'll do it, thanks ". I was instructed to leave the room, leaving behind the WCEC employees, Moonhee, Steve, Cyndi Miller, Lee Reeves, Brian Floyd and other people that I didn't recognize. I waited in the hall outside of the polling room. Steve stepped outside the polling room and announced that "it could take up to an hour for the recount". It took about one-half hour to conduct the recount, when the door was then opened. I stepped into the polling room to have Moonhee present the final recount tally sheet to me, which I took a picture of and gave it back.

I then departed the Marriott around 10:30 pm.

This deposition can be corroborated by any video surveillance evidence recorded by the Marriott.

Stephen G. Giraud 3/24/25

Stephen G. Giraud
Submitted this day 3/24/25

EXHIBIT N

WILLIAMSON COUNTY CONSERVATIVES

THE CHOICE IS CLEAR: Attend the Williamson County Republican Reorganization Convention on March 4th and vote for the entire Williamson County Conservatives ticket.

OUR CORE PRINCIPLES

✓ **PROTECTING YOUR RIGHT TO VOTE:** We'll always ensure that the right to vote in primary elections by Republican voters, including Active-Duty Military and ALL First Responders, is never thrown in the trash.

✓ **WINNING ELECTIONS & BEATING DEMOCRATS:** We support Republican nominees and will never withhold support or attack them. We will always ensure that grassroots volunteers in all parts of Williamson County, like the Young Republicans and Republican Women's clubs, are valued in the WCRP.

✓ **TRUST AND TRANSPARENCY:** No more secret votes and unaccountable closed door back room deals! We are Grassroots Conservative Republicans, NOT Democrats.

Please complete this form to register and pre-qualify to vote at the Williamson County GOP Re-Org Convention or visit: www.williamsoncountyconservatives.com

THE CURRENT REGIME'S LACK OF PRINCIPLES

✗ **CANCELING ELECTIONS:** The current regime disdains grassroots GOP voters, including Active-Duty Military and ALL First Responders. They've vowed to cancel primary elections, INSTALL "Republican" nominees, and throw YOUR right to vote in the trash. Their message: 'If you don't like it, TOUGH.'

✗ **AIDING DEMOCRATS & OPPOSING REPUBLICAN NOMINEES:** The current regime refuses to support many Republican nominees, publicly attacks them, supported "Independents" in several elections, and caused Democrats to win recent campaigns in our conservative county.

✗ **DESTROYING THE GOP WITH SECRET VOTES & BACKROOM DEALS:** The current regime holds secre meetings and votes with zero accountability, rigg nominations like Democrats. They even tried to t the Young Republicans and Republican Women' clubs out of the Party and removed elected Trur Delegates to the RNC Convention.

EXHIBIT O

Declaration – Brian Clifford

Declaration in support of the Notice of Contest filed on March 9, 2025, against the March 4th, 2025, Williamson County Republican Party Reorganization Convention.

1. My name is Brian Clifford. I live in Williamson County Tennessee.
2. I am a dues paying member of the Williamson County Republican Party, a dues paying associate member of the Williamson County Republican Career Women, a dues paying Capital Club Member with the Tennessee Republican Party.
3. I am an elected Republican official in Williamson County, Tennessee, holding the office of County Commissioner. I participated as a candidate in a local election in Williamson County going through a Republican primary and general election.
4. I routinely support Republican candidates through money and time, and I support duly elected Republican candidates and officials.
5. I received an email from the Williamson County Republican Party (WCRP) and Chairman Tracy Miller on 1/15/25 stating that the WCRP would hold its Reorganizational Meeting on Monday, February 3, 2025.
6. I received an email from the WCRP and Chairman Tracy Miller on 2/4/25 announcing the date and place of the Reorganizational Convention would be March 4, 2025, at the Factory at Franklin. This communication did not set the time of the convention.
7. I filed to be a candidate for Chairman of the Williamson County Republican Party on February 8, 2025, through an email to Tracy Miller. I never received any official acceptance of my candidacy. On February 13, 2025, I forwarded the same email to State Party Chairman Scott Golden to confirm his receipt. I received a response from Mr. Golden on February 13, 2025, telling me that the WCRP Contest and Credentials Committee "will be in communications regarding their meetings." I never received any communication from the Contest and Credentials committee about any of their meetings, nor did I see any posting about the time and place of such meetings for me to access.
8. On February 18, 2025, I emailed Chairman Scott Golden to express concerns and issues with the WCRP Reorganization Convention. This included issues with the WCRP rejecting bona fide Republicans from registering to attend the event, the bias of the WCRP Contest and Credentials Committee, the bias of an SEC member working on the event, and the issue with the incumbents having access to the list of pre-registrations while I did not have the same opportunity. Email attached as an exhibit. I never received a response to that letter.
9. I received a call from Chairman Tracy Miller on 2/20/25 informing me that the WCRP was discussing a change of venue for the Reorganization Convention. That same day, I received a blast email from the WCRP and/or Tracy Miller announcing that the location of the Reorganization Convention was moved from the Factory at Franklin to the Franklin Marriott Cool Springs. This was the first day I was made aware that a change of venue was being considered after the WCRP had fixed the location on 2/3/2025.

10. I never received any notice of meetings by the WCRP Contest and Credentials Committee, nor am I aware that any notice of such meetings was publicly noticed at all.
11. On February 26, 2025, I received concerning and inappropriate emails from Debbie Deaver stating in part:
    a. Ms. Deaver stated "I also assume since you are both running with slates you will share this information with your teams."
        i. I responded to Ms. Deaver that "I cannot be responsible for sharing this information with the other candidates, nor am I responsible for their candidacy or part of the Contest and Credentials Committee. Please share this information directly with other candidates as you did with me for the Chair candidacy." To my knowledge, Ms. Deaver never did so.
        ii. I was running as a candidate for Chairman. While the Williamson County Conservative PAC supported my candidacy and others on the same slate of candidates, each candidate was running for their own position. I was not responsible for managing the Williamson County Conservatives PAC, nor was I responsible for managing the candidacy of the other down-ticket candidates.
    b. Ms. Deaver stated "the doors open at 4:30 and close promptly at 6:00."
        i. The doors opened well before 4:30, which as I state below, the doors were opened and registration began at least on or before 4:02 pm.
    c. Ms. Deaver stated "Michelle Forman will be greeting candidates, answering questions, and directing you to your seating."
        i. I objected to Ms. Forman having a formal role in this election due to Ms. Forman's complete bias and open support of my opposition, which included her making attacking statements towards me and my campaign openly on social media.
        ii. Ms. Deaver responded on 2/26/25 that Ms. Forman would no longer take that role. Yet, Ms. Deaver put many other people openly against my campaign in formal roles at the election, including four county commissioners that had openly endorsed and/or supported my opponents, to work in one of the most pivotal roles in the election, which was to check credentialed voters upon entry to the voting room and to provide them with voting ballots.
    d. Ms. Deaver stated "Candidates may not be in the polling station or engage voters in line during the election. At the conclusion of the voting, we will call the candidates for Chairman to the polling station to watch the tabulation of the vote."
        i. I was never called to the polling station to watch the tabulation of the vote.
        ii. I noticed several volunteers for my opposition that were in the polling room, actively engaging voters, and advocating for voters to "vote for the entire Elevate slate" inside the polling room.

e. This email exchange showed Ms. Deaver's had a combative attitude towards me and my campaign, and even directly criticized my campaign in a negative manner. My response to her email was professional and factual. Yet, her response back to me was combative, defensive, resistant, and critical of me and my campaign.

f. The email string is attached as an exhibit hereto.

12. Ms. Deaver's actions leading up to Reorganization Convention showed bias towards my opponents and showed combativeness and resistance towards me and my campaign.

13. On March 4, 2025, at 4:00 pm, I walked from the back of the Marriott hotel lobby to the check-in area at the Marriott convention center for the WCRP Reorganization Convention. When I arrived at the registration desks for the WCRP Reorganization Convention at approximately 4:02 pm, the registration/check-in process was already open and several people were already registering ahead of me.

14. On March 4, 2025, I arrived at approximately 4:02 pm at the registration desks for the WCRP Reorganization Convention. I noticed that the doors to the convention floor were already open and people were going in and out of the convention area.

15. During the WCRP Reorganization Convention, I notice several people on the convention floor that I know not to be qualified participants in the WCRP Reorganization Convention, including Romante Hamer.

16. At the beginning of the Reorganization Convention, Chairman Miller spent about 10 to 15 minutes campaigning for my opposition on stage in front of the entire convention audience. Chairman Miller touted the supposed successes of the local party and contributed those successes to the opposition slate of candidates, mentioning them by name several times. This was an inappropriate campaign tactic in support of the opposition slate to which I was not afforded the same time or opportunity to campaign at the Reorganization Convention.

17. Voting for candidates at the WCRP Reorganization Convention all took place at the same time on the same ballot. The election for Chairman did not take place first or separate.

18. I noticed the doors to the voting area from the convention floor opened almost immediately following the start of the convention at 6:00 pm and were open during my candidate speech for the Chairman position, which was the first candidate speech of the evening.

19. There was no person working the WCRP Reorganization Convention that I know to have been neutral or that supported my campaign. From all accounts, the people working the WCRP Reorganization Convention all supported my opponents.

20. When I entered the voting area to get a ballot, I noticed there were four county commissioners present that were responsible for checking credential bracelets and handing out ballots to voters entering the area: Mary Smith, Lisa Lenox, Christopher Richards, and Barb Sturgeon. Each of these County Commissioners had either issued official endorsements for my opponents or had openly supported my opponents in public and on social media.

21. I have attached as exhibits to this declaration all emails I received from Debbie Deaver and/or the Contest & Credentials Committee.

22. Attached as exhibits to this declaration are screen shots of Commissioners Smith, Lenox, and Richards demonstrating their endorsements and full support of my opponents ahead of the WCRP Reorganization Convention.

23. Almost immediately after the results of the election were announced I began hearing of irregularities and improprieties from convention delegates. Given the concerns of these delegates and the closeness of the Chairman's race, I requested a recount of the votes cast in that contest. I requested that Brian Floyd serve as my representative to monitor the recount.

24. Following the recount, Mr. Floyd informed me that the outcome of the Chairman's race did not appear to change, but that he had concerns that recount had not been conducted in a fully transparent or impartial manner. He specifically reported to me that check-in logbooks, chain of custody records of the wrist bracelets, and spoiled ballots had not been presented for review and examination, as would be standard procedure in a recount.

EXHIBIT P

Williamson County Conservatives
2h ·

Since Commissioners Maryarlene Gregory Smith (Mary Smith - Williamson County Commissioner), Barb Sturgeon, Lisa Hayes Lenox, Christopher Richards, Republican Candidate, Williamson County Commissioner all clearly endorsed Elevate and directly participated in handling all the ballots in the most rigged election in TN history, we have a simple question for you.

It's a question to which MANY of your constituents demand an answer:

Do you support going to Convention/Caucus for local elections?

EXHIBIT Q

I, Mary Smith, a resident of Williamson County, Tennessee, and a County Commissioner, hereby declare under penalty of perjury that the following is a true and accurate account of my role during the Williamson County Republican Party (WCRP) Reorganization Convention on March 4, 2025, and a refutation of the claims made against me in the declarations and Brief in Support of Notice of Contest.

1. On February 15, 2025, WCRP Chairman Tracy Miller appointed me to the Contest & Credentials Committee (CCC) for the March 4, 2025, Convention. My roles were limited to greeting voters—offering cookies and directing them to registration—and removing wristbands at the voting area entrance, where Denise Birnbaum handed out ballots. I did not influence the election, contrary to the allegations.

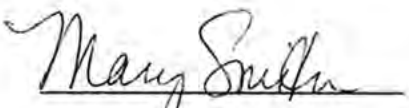
2. Claims by Brian Clifford, Patti Carroll and Shauna Graham that I was responsible for the distribution of ballots are false; Denise Birnbaum was assigned to oversee ballot distribution at our designated station. Shauna Graham's claim that Lisa Lenox handed her a ballot while at a table with me is incorrect—I worked solely with Denise Birnbaum, and Lisa Lenox was at a separate table with her own partner.

3. The Brief's accusation that I, as an Elevate 2025 supporter, influenced the outcome is baseless. My tasks were logistical, not influential. I had no access to Elevate literature, wore no Elevate sticker, and did not engage voters on candidates or distribute materials. Allegations of intimidation exaggerate my role as one of many volunteers with no decision-making power.

4. Under the Williamson County Election Commission (WCEC) oversight, the process was orderly, with ballots collected by WCEC staff. I followed instructions, cast my vote after my duties, and then exited before counting began. The claims against me stem from my Elevate association, not my actions, and lack evidence beyond bias accusations.

I attest that I took no action to intimidate or influence the election. My role was supportive, supervised, and fair.

Executed this 24th day of March 2025, in Williamson County, Tennessee.



Mary Smith

Declaration – Christopher Richards

I am a sitting Williamson County Commissioner for District 7 and was a volunteer at the 2025 Williamson County Republican Party Reorganization Convention (the "Convention").

At no time did I witness any of the purported election interference alleged by the WCC. I hereby state that I in no way cheated nor committed any act of election fraud, nor did I witness any such behavior.

The foregoing is true and correct.

Christopher Richards 3/24/2025

Declaration – Lisa Hayes

I am a sitting Williamson County Commissioner for District 1 and was a volunteer at the 2025 Williamson County Republican Party Reorganization Convention (the "Convention").

At no time did I witness any of the purported election interference or voter intimidation, by either the Elevate slate or convention volunteers, asalleged by the WCC. I hereby state that I in no way cheated nor committed any act of election fraud, nor did I witness any such behavior.

The foregoing is true and correct.

/LISA HAYES/ (electronically acknowledged March 24, 2025 at 1:17 pm)

Lisa Hayes

Declaration – Barbara Sturgeon

I am a sitting Williamson County Commissioner for District 8 and was a volunteer at the 2025 Williamson County Republican Party Reorganization Convention (the "Convention"). I have held my position on the Williamson County Commission since 2014.

At no time did I witness any purported election interference alleged by the WCC. I hereby state that I, in no way, cheated nor committed any act of election fraud, nor did I witness any such behavior. Also, I did not witness any behavior that would have me think such fraud might be likely or possibly happening.

My volunteer duties involved greeting attendees as they entered the Marriott entrance, offering them cookies, and directing them to the registration tables. I also assisted at one of the convention hall entrances to ensure those entering were bona fide delegates with wristbands. I redirected several people who tried to enter without a wristband either to the registration tables or to leadership in cases of the press wanting access. Finally, I cut off wristbands from delegates as they entered the voting room entrance after which my assistant gave them one ballot. I directed delegates to the voting booths and instructed them that they would find a writing implement there and asked them to fill in the bubble choices on the ballots and not to use x's, check marks or any other symbol.

In general, everyone was pleasant and positive about the event & the process. I regularly thanked all delegates for making the effort to attend and participate in the reorganization regardless of whatever stickers they were wearing or campaign materials they were carrying and I saw a lot of campaign materials from both sides being carried everywhere. At no time did I attempt to influence delegates one way or the other on who they should vote for.

The foregoing is true and correct.

Electronically signed:

Williamson County Commissioner Barbara J Sturgeon

Declaration – Bill Petty

I am a sitting Williamson County Commissioner for District 10 and was a volunteer at the 2025 Williamson County Republican Party Reorganization Convention (the "Convention").

At no time did I witness any of the purported election interference alleged by the WCC. I hereby state that I in no way cheated nor committed any act of election fraud, nor did I witness any such behavior.

The foregoing is true and correct.

Bill Petty

Declaration – Donna Clements

I am a sitting Williamson County School Board member for District 8. I was not a volunteer at the 2025 Williamson County Republican Party Reorganization Convention (the "Convention"), but was a bona fide delegate in attendance. At no time did I witness any of the purported election interference alleged by the WCC. I hereby state that I in no way cheated nor committed any act of election fraud, nor did I witness any such behavior.

The foregoing is true and correct.

Donna Clements

EXHIBIT R

From: Ted Boyatt <tboyatt1@gmail.com>
Subject: EMERGENCY MEETING TODAY AT 6 PM- WCRP Executive Committee
Date: April 14, 2023 at 12:30:35 AM CDT
To: Cheryl Brown <cheryl@williamsongop.org>
Cc: Mary Kate Brown <marykatebrown@comcast.net>, Lynn Rhoades <carcher7@aol.com>

Cheryl-- Send out the language below TONIGHT to your Board (excluding Steve, Cyndi, and the YR Chair). You will also want to CALL EACH ONE tomorrow morning to fill them in and make sure they attend. CC me on your email, and when I see it, I will email the Contest and Credentials Committee to let them know the same.

WCRP Officers,

As some of you may already be aware, the situation regarding the upcoming County Reorganization Convention next Tuesday has entered unprecedented territory. **The status of this convention is now uncertain.**

We have some urgent and big decisions we, as a board, need to make regarding our next steps. The Contest and Credentials Committee has asked that we join them together for a single, big meeting. **BE ADVISED, this meeting may be the last one we hold as a board,** so it is imperative that everyone attend in person (or at the very least, call in via speakerphone).

We WILL BE MEETING TODAY at 6 PM at the following location:

Fairfield Inn and Suites
7086 Bakers Bridge Ave
Franklin, TN 37067

I ask that you keep this meeting in confidence and that no one outside of this email chain and the members of the Contest & Credentials Committee be invited to attend. This meeting will be solely for us and convention officers.

Please call or email me directly if you have questions, or if you will need to dial-in to the meeting.

EXHIBIT S

Statement by Donald G. Beehler

March 24, 2025

I am a registered voter in Williamson County and a qualified ("bona fide") participant. On March 4, 2025, I attended the Williamson County Republican Party (WCRP) reorganization convention. The following are my observations:

Despite the Williamson County Conservatives (WCC) candidates' well-publicized assertion prior to the convention that their opponents were "trying to rig the Williamson GOP election," what I experienced on March 4 was a well organized, well run and very fair election.

Upon arriving at the convention, WCC chair candidate Brian Clifford was talking with people as they entered and asked the lady in front of me if she was there to vote. (She was a guest at the hotel but not there to attend the convention.) He then approached me and introduced himself with literature in hand, which I declined to accept from him.

As I walked down the hall to register, Drell Floyd, the WCC's candidate for 2nd vice chair, was in the hallway greeting people. I spoke with him briefly about my disappointment in the lies, deceit and character assassination conducted against their opponents. Mr. Floyd said he didn't have anything to do with the campaign, and had he know how it was going to be conducted he might not have run as a candidate.

A brief overview of the WCC campaign and events leading up to the convention may be helpful:

When voter registration reached record numbers, it became clear the original venue was too small and the convention needed to be moved to a larger place (as was the case with the 2023 convention). Rather than commending this move so that every qualified GOP participant who wanted to vote was able to do so, the WCC alleged voter suppression and election rigging.

It's unclear how moving to a larger venue that accommodates more people is tantamount to voter suppression — especially when notification of the new location was made well in advance — nor has the WCC explained how the larger venue supposedly made it easier to cheat. But as Rush Limbaugh used to say, "It's not the nature of the evidence; it's the seriousness of the charge."

The seriousness of the charge appears to be the essence of the WCC's appeal. Following their defeat, and a recount that confirmed the election results, the WCC claimed on their Facebook page that this was "the most rigged election in TN history."

The WCC further asserts that the Elevate candidates, the WCRP, the Contest & Credentials Committee (CCC), a number of Williamson County Commissioners, a school board member, numerous volunteers and the TNGOP (which oversaw the election and recount) acted improperly and were somehow responsible for all eight of their candidates' losses. Consider how many people have to be lying for the WCC to be telling the truth.

The conspiratorial overtones are absurd and unsubstantiated, but they fit the pattern of behavior that has typified the WCC candidates' conduct since they first appeared on the scene by falsely introducing themselves as "THE ONLY Conservative ticket" in the race.

This behavior has included lies; purposefully sown confusion; underhanded and misleading tactics; and a series of false, highly damaging defamatory attacks in their mailings, text messages, calls and media stories against Elevate candidates, the WCRP leadership, volunteer members of the CCC and others.

These statements have gone far beyond typical "negative campaigning." They are defamatory, demonstrably false and are easily refutable.

Prospective GOP voters were barraged with WCC mailers, texts and social media posts using names/photos of individuals who had absolutely nothing to do with this contest, such as Joe Biden, Kamala Harris, George Soros and Barack Obama — as well as a comparison of the WCRP leadership to Joseph Stalin, a man who killed millions of his own people.

The idea, of course, was to connect these well-known leftists and a mass murderer with the Elevate slate. Deceit has been the cornerstone of the WCC's campaign, with the WCC consistently alleging all sorts of misconduct against their opponents and others, but failing to provide evidence to back up their claims. It was the most dishonest political campaign I have seen in our area in my 30+ years of living in Williamson County.

While refuting the lies, deceit and character assassination against honorable fellow Republicans is not the purpose of this statement, I believe such tactics speak volumes about the WCC candidates' character, credibility and obsession to win at all costs.

I think it is relevant, however, to ask those deciding this appeal to consider the devious and methodical way in which these candidates set expectations for cheating on the part of the previously mentioned groups and individuals. The WCC hedged against its loss at the convention by explicitly claiming beforehand that voters would be met with attempts to "suppress" their votes, and expressly claiming that their "opponents" were "trying to rig the Williamson GOP election."

These false allegations were accompanied by a photo of President Trump in an apparent effort to link the controversy surrounding his 2020 election loss and the then-pending WCRP convention.

The morning of the March 4 convention Steve Hickey, Elevate's candidate for chair, was a guest on 99.7 WTN radio's Dan Mandis show. Throughout the interview Mr. Mandis focused on the "primary vs. caucus" issue, while Mr. Hickey pointed out the problem the WCRP and Elevate candidates are highlighting, which is Democrats voting in Republican primaries. He clearly stated his preferred solution was for the General Assembly to pass a party registration bill, which is currently under consideration. Mr. Hickey went on to explain that all options were on the table and no decision had been made.

That evening, in a packed convention ballroom with standing room only, Mr. Clifford's speech referenced the Dan Mandis interview, and he told the bald-faced lie that Mr. Hickey "finally admitted, on air, that they [Elevate] in fact plan to cancel primary elections in Williamson County." I personally heard Mr. Hickey's interview, as did my wife and several others I know. At no time did Mr. Hickey state an intention to do away with primaries. Given the spontaneous uproar of boos and jeers from the audience when Mr. Clifford lied about what Mr. Hickey said, many other people apparently knew that simply was not true. In fact, Mr. Mandis lamented on air, after the interview, that he didn't get an answer to that question, which flatly contracts Mr. Clifford's claim about what Mr. Hickey said in the interview (which was recorded).

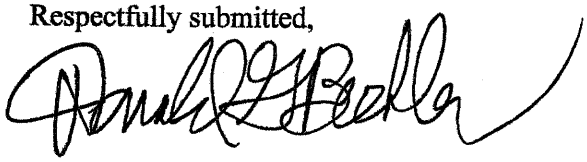
As my wife and I were in line to vote, Mr. Clifford greeted us. I told him I heard the Mandis interview and that he (Mr. Clifford) misrepresented what Mr. Hickey said. Mr. Clifford shrugged it off and didn't respond, choosing instead to move down the line to speak with others. One would think if Mr. Clifford really believed what he said, he would have defended his statement. But he did not do so because it is an indefensible, easily disprovable lie. He is, in my estimation, a man who cannot be trusted to speak truthfully or conduct himself in an ethical manner, as is the case with members of the WCC slate who have repeated many of Mr. Clifford's false claims.

I believe WCC candidates, individually and collectively, have done great harm to the WCRP and the TNGOP by creating division, suspicion and long-term damage to the party's reputation through a series of false and unsubstantiated accusations — before, during and after the convention. Interestingly, of the eight WCC candidates seeking board positions in the Williamson County Republican Party, five of them are not even members of the local Republican party they want to lead. From what I have seen, they do not appear to be concerned about the best interests of the party or the discord they continue to sow among Republicans.

In closing, I urge those reviewing this appeal to consider how many upstanding Williamson County Republicans need to have been engaged in election fraud for the WCC's claims to be valid and comport with reality.

In my opinion, this appeal is nothing more than an act of desperation by people who refuse to accept the fact that they lost this election, fair and square. Voters rejected their deceitful lies and efforts to demonize their opponents, the WCRP and many others, and instead elected candidates who seek to unite the party and are focused on issues, solutions and a positive vision for the Williamson County GOP.

Respectfully submitted,



Donald G. Beehler

Franklin, TN

EXHIBIT T

4th Quarter for WILLIAMSON COUNTY CONSERVATIVES submitted on 01/26/2025

Beginning Balance

Beginning Balance $0.00

Receipts

Monetary Contributions, Unitemized $100.00

Monetary Contributions, Itemized

Contributor	C/P	Date	Amount
LEE , BAXTER 917 WOODMONT BLVD NASHVILLE , TN 37204 RETIRED RETIRED		12/18/2024	$5,000.00
MARSH DEVELOPMENT 4424 PEYTONSVILLE RD FRANKLIN , TN 37064		12/13/2024	$2,500.00
WINSTEAD , KURTIS 100 PEBBLE BEACH DR FRANKLIN , TN 37069 ATTORNEY SELF-EMPLOYED		01/03/2025	$1,000.00

TOTAL CONTRIBUTIONS **$8,600.00**

(other than adjustments, loans, and interest)

Contribution Adjustments $0.00

Loans Received $0.00

Interest Received This Reporting Period $0.00

TOTAL RECEIPTS **$8,600.00**

Disbursements

Expenditures, Unitemized $0.00

Expenditures, Itemized

Vendor	C/P	Purpose	In-Kind	Independent	S/O	Date	Amount
BATTLE GROUND STRATEGIES GROUP P.O. BOX 680805 FRANKLIN , TN 37068		POLITICAL / ADMIN CONSULTING				12/24/2024	$3,000.00
BATTLE GROUND STRATEGIES GROUP P.O. BOX 680805 FRANKLIN , TN 37068		POLITICAL / ADMIN CONSULTING				12/18/2024	$3,000.00

Loan Payments $0.00

Obligation Payments $0.00

TOTAL EXPENDITURES **$6,000.00**

(other than adjustments)

Expenditures, Adjustments $0.00

TOTAL DISBURSEMENTS **$6,000.00**

Ending Balance

ENDING BALANCE **$2,600.00**

Outstanding Loans

TOTAL OUTSTANDING LOAN BALANCE $0.00

In-Kind Contributions

In-Kind Contributions are not included in the report ending balance.

Unitemized	$0.00
Itemized	$0.00
TOTAL IN-KIND CONTRIBUTIONS	**$0.00**

Obligations

Obligations are not included in the report ending balance.

Unitemized	$0.00
Itemized	$0.00
Obligations, Outstanding from Previous Reports	$0.00
TOTAL OBLIGATIONS OUTSTANDING	**$0.00**

EXHIBIT U

Declaration – Christine Deekens

I am a bona fide member and former Assistant Secretary of the Williamson County Republican Party, as well as a volunteer on the Contest and Credentials Committee ("CCC") for the 2025 Williamson County Republican Party Reorganization Convention (the "Convention").

- I personally volunteered to assist with the check-in table and witnessed a gentleman to my left, positioned at the door to the Convention Center, and holding a clipboard upon which he presumably had a list that he repeatedly verbally referenced.
- Apparently, his list was different than the official one the Tennessee GOP provided because of the following:
- There were several people who approached me to check in who were not on the State's list.
- I asked each of these individuals to go to the room where the state GOP representatives were to resolve the issue, in accordance with Tennessee GOP guidance.
- These several individuals appeared confused because although they were not on the state GOP's official list, the gentleman referenced above claimed that they were on "his" list.
- After pointing out to Ms. Debbie Deaver, chair of the CCC, that this gentleman -- who was NOT a poll watcher -- was communicating with voters based on "his" list, Ms. Deaver asked him to move to an observer role and step away from the registration table itself. Apparently, there were also other complaints that this gentleman was communicating with voters based on "his" list.

The foregoing is true and correct.

Christine Deekens

Christine Deekens

EXHIBIT V

STATEMENT OF KEVIN FULLER CONCERNING THE MARCH 4, 2025 REORGANIZATION CONVENTION OF THE WILLIAMSON COUNTY REPUBLICAN PARTY

I, Kevin G. Fuller, am a resident of, and a registered and bona fide voter in, Williamson County, State of Tennessee. I do herby affirm the following to be accurate to the best of my knowledge as it pertains to my attendance as a qualified ("bona fide") participant in the Williamson County Republican Party's (WCRP) Reorganization convention, March 4, 2025, and an active researcher into the elections of the Williamson County Election Commission and the state of Tennessee

My volunteer job in the voting room was a runner for spoiled ballots and to help guide folks to the voting tabulators. Below are my comments of my experience.

After training, we were instructed by Jonathan Dudda to return to the voting area before the last speeches began around 7 pm. I hung around outside the convention room and realized that they were letting people in to vote around 6:15 pm. I was glad I was right there and able to immediately jump in. Even though this isn't what Jonathan Dudda instructed, there was a part of me that wondered if some of the WCC minds could have been changed to the Elevate slate had they heard the excellent speeches. It appeared on the surface someone wanted them to vote early for reasons of crowd control.

I did notice prior to 6 pm that there was already at least 40 or 50 people waiting in line to vote. Many probably had clearly made up their minds about for whom to vote for and didn't want to sit through the speeches.

Most of the initial 100+ voters were not elderly or disabled, but the majority had WCC stickers - many had drinks in their hands or you could tell they had been drinking. Several of them appeared to be drunk. Several of these folks had spoiled ballots and had to get a new ballot.

Of the spoiled ballots that I saw… Instead of voters filling in the oval's, they either put x's or checkmarks or circles around the ovals.

Some of the elderly folks had trouble seeing the fainted colored ovals and didn't understand what they needed to do until I showed them the sample of how to fill out the ballot in the upper right hand corner of the form.

By far the majority of people were very nice and friendly…thanked me for volunteering. I only had one guy with a WCC sticker that was rude - he told me that I was in his way and to move.

Also, the majority of the people were very complementary of the voting process stating that it was easy and they liked it. Many said it was the best voting experience they've ever had.

Kevin Fuller

_____

Dated: 03/24/2025

SUSAN RICHARDS
7020 Ellendale Drive
Brentwood, TN. 37027

March 24, 2025

To Whom it May Concern,

I was a participant at the Williamson County Republican Party Reorganization on March 4, 2025, at the Cool Springs Marriott in Franklin, TN. Here are my observations.

The convention was well organized, and volunteers were very helpful in getting pre-registered voters checked in. Knowing there would be a lot of people in attendance, it was well run. I especially appreciated that limited mobility voters were offered the chance to vote first. I know many of them were worried about having to stand in a long line and they already knew who they wanted to vote for.

I witnessed Brian Clifford standing at the door out of the ballroom that was used for voters. He was shaking everyone's hand and engaging every voter standing in line once the speeches were over.

I also was engaged in line with a very rude Rob Verrel. I was standing in line when I realized that he was standing right behind me in line waiting to vote. I asked if he was the candidate who accused the Williamson County Republican Party of causing Angela Beaton to lose her School Board race to a Democrat. When I pointed out to him that Jay Galbreath endorsed the Democrat in the race, and that D6 (his district) and D7 (her district) share schools, he started shouting over me trying to intimidate me into silence. He scoffed at the idea that Jay could have swayed 160 voters, and loudly proclaimed that he, Rob Verrel, "dragged Margie over the finish line' in D5.

Having read the complaint, I find it interesting that some candidates didn't realize they could have poll watchers. Did they not read the bylaws? The bylaws clearly state they can request

poll watchers. The bylaws do not state that the SEC or credentialing committee needs to review the bylaws with each candidate. Others on their slate knew to have poll watchers, so why are a few of them complaining?

The election room was protected by volunteers verifying that each of us had a wristband attached before allowing us into the room. The volunteers in the room were well trained and objective in carrying out their duties. I loved having hand-marked paper ballots! It is easy to see voter intent and having the machines count the ballots worked well. The machine technician made sure the ballot was successfully scanned before confirming with me and showing me the exit.

Thank you for a well-run convention.

Sincerely,

Susan Richards

Susan Richards

7020 Ellendale Drive

Brentwood, TN 37027

615-473-3709

AFFIDAVIT

Comes the Affiant Hannah Tiblier

Under penalties of perjury who, being duly sworn, deposes and says, to wit as follows:

I am a bona fide member and former First Vice Chairman of the Williamson County Republican Party. I was in South America on vacation when the March 4th, 2025 WCRP Convention/Reorganization occurred.

Further Affiant Saith Not

Hannah W. Tiblier

Signature of Affiant

TO: Debbie Deever, the Credentials Team for the GOP-Williamson County 2025 Reorganization, and the WCRP leadership

RE: 2025 Reorganization

I am writing to thank you for a well organized and run convention to accomplish the difficult task of voting for our county party leadership. I was there and voted and it was well organized and clearly unbiased and trustworthy. I trusted the process that was used because the staff were well organized and knew their rules and processes and in part due to the participation of the state leadership and the election commission staff during the entire event. This ensured that impartial professionals were there during the entire voting process to oversee all steps - this gave me added peace of mind. The results were freely observed by both sides contending for the seats and by these neutral parties. There was open access to both parties to observe at any point in the process and yet the ballots and tabulators were manned and watched throughout so that the process was controlled carefully. Despite the double volume of people and so many were added in large batches at the last day or two – you all did a wonderful job of managing this huge crowd and controlled the situation admirably. During the previous reorg convention held in 2023 it seemed similar and uneventful in the same way during the event. I much preferred this year's convention as the qualifications for voting were fairer – just the voting record – no vouching. This year, I know several people who were notified they could not vote, but were actually eligible and they easily corrected the situation by contacting the credentials team and were able to vote. Thanks to everyone for that quick responsiveness during this hectic time!

Specifically for the 2025 reorg I observed the following:

The stated rules were observed and carried out equally for everyone. Everyone was checked in and verified and only qualified voters were issued a wristband for voting.

The qualifications for voting were stated early on publicly and were followed exactly without regard to connections or influence. This was unbiased in any way – based soley on a person's voting history that is the record kept in the elections office.

Voting was strictly controlled – one person with a wristband was handed one ballot and their wristband was immediately cut off. They were then able to fill out the ballot and told where to place the completed ballot. It was all very clear and orderly. There were observers and election staff helping and watching everyone passing through this line.

I read the instructions and easily filled out my ballot and placed it into the tabulator.

It all went very smoothly and there were many observers of both sides present at all times, as well as state gop and elections officers. Bravo for accomplishing such a seamless vote so quickly and accurately - it seemed to me was a wonderful accomplishment to me.

Thank you very much! I have full confidence in the accuracy and fairness of the 2025 reorganization results.

Valerie Williams 3/24/2025

Sincerely, Valerie Williams

1603 Bernini Place, Brentwood, TN 37027

(615) 953-0654

STATEMENT OF LAURA GIRAUD CONCERNING THE MARCH 4, 2025 REORGANIZATION CONVENTION OF THE WILLIAMSON COUNTY REPUBLICAN PARTY

I, Laura Giraud, am a resident of, and a registered and bona fide voter in, Williamson County, State of Tennessee. I do herby affirm the following to be accurate to the best of my knowledge as it pertains to my attendance as a qualified ("bona fide") participant/volunteer in the Williamson County Republican Party's (WCRP) Reorganization convention, March 4, 2025.

I had no volunteer title, I simply greeted people at the door and gave them an Elevate postcard.

I was "posted" at the Northwestern set of doors to the convention hall. Around 5 pm, I heard the following exchange between Brian Clifford and Aimee' Flecther.

Brian Clifford of the Williamson County Conservatives slate was walking toward voters as they were approaching the entrance to the building, he was asking them if they had come to "save their votes" and stating "stop the termination of the primaries from the voters". He approached many people when Aimee' approached Brian and made the comment that "You are lying to people." Brian simply shrugged his shoulders and moved away from her. Then Aimee' asked him "how do you sleep at night?". To this question, Brian responded "I sleep just fine" and he walked up to another voter and asked if he was here to "save his vote".

I then departed the front of the Marriott around 5:45 pm.

This deposition can be corroborated by any video surveillance evidence recorded by the Marriot.

Laura L Giraud

Laura Giraud
Submitted this day 3/24/25

State of Tennessee County of Williamson
Subscribed and sworn before me on 03/24/2025
(Date)

(Notary Signature)

SCOTT TRELOAR
STATE OF TENNESSEE NOTARY PUBLIC
WILLIAMSON COUNTY

STATEMENT OF FRANK LIMPUS CONCERNING THE MARCH 4, 2025 REORGANIZATION CONVENTION OF THE WILLIAMSON COUNTY REPUBLICAN PARTY

Executive Summary

In this statement, I will cover:

- Statement of my credentials
- General observations about the convention event
- Election-related observations related to WCC complaints
- Conclusion

1. I, Frank M. Limpus, am a resident of, and a registered and bona fide voter in, Williamson County, State of Tennessee. I do herby affirm the following to be accurate to the best of my knowledge as it pertains to my attendance as a qualified ("bona fide") participant in the Williamson County Republican Party's (WCRP) Reorganization convention, March 4, 2025, and an active researcher into the elections of the Williamson County Election Commission (WCEC) and the state of Tennessee.

2. I also offer my observations as a longtime Republican voter and poll watcher in Williamson County elections. I am also an election integrity researcher and founder of Tennessee Voters for Election Integrity, a group formed in 2021 to research both Williamson County and Tennessee election commissions and election processes and report to officials discrepancies or process issues that need to be addressed to better ensure Tennesseans have a safe, fair, secure, and transparent voting process. Videos, white papers, news reports supporting all of our findings can be found at our website here.

3. My group and I have presented our research to the Tennessee Secretary of State, Tennessee Coordinator of Elections, the Tennessee State Election Commission (TNSEC), the chairman of the Williamson County Election Commission (WCEC), the Tennessee Senate Majority Leader, various state and county legislators and citizens/citizen groups and Republican party officials across the state and in the southeast. Many of our podcasts and presentations can be found here.

4. Over the past four years, I have also personally attended the last 50 in-person meetings of the Williamson County Election Commission, as well as at least 15 in-person meetings of the Tennessee State Election Commission (TNSEC). I have spoken before both organizations concerning election integrity issues. I have also made a number of public records requests of both the WCEC and the Secretary of State (regarding the TNSEC), so I am aware of and understand the processes with both meetings and records of these entities.

General observations about the event

5. I witnessed a convention that had a lot of people in attendance and was, at times, crowded, but which was run as best as possible given the curve balls I understand the WCRP and the Contest and Credentialing Committee (CCC) were thrown.

6. Arriving at the Marriott at approximately 5:15 p.m., my wife and I were registered relatively quickly, were checked at the door for our wristbands, found two seats in the back of the already crowded room, listened to the speeches, ended up at almost the end of the line (that snaked through the ballroom and down the hall, yet moved fairly quickly) to vote, voted and left by about 8:15 p.m. Except for the turnout and the alcohol supplied by the free-booze hospitality suite of the WCC and the paid-booze hotel bar, the convention had the same "feel" as the 2023 convention, which we also attended, and the 2021 convention which I attended.

7. A key observation: From the outset, the WCC set the expectations in all of their mailings, texts and robocalls that the WCRP and Elevate slate (which had no control over the meeting) would be "tampering with the vote," "rigging the election," "preventing you from voting," "steal your vote," "canceling our elections," "handpicking nominees in dark rooms," etc. This attempt to scare and fearmonger potential voters against the WCRP, the TNGOP and their convention/election appeared to be intended to sow as much disdain and discontent for the process as possible. It established an air of suspicion and distrust for the WCRP.

8. Despite that, the election was held successfully in a closed (albeit small) voting center to control the process, with two security/wristband checkers at the front door and another security at the exit, poll watchers from both slates in the vote center, six members of the Williamson County Election Commission and a "runner" in the room to work the flow of voters and monitor the election, an abundance of privacy booths for marking selections on hand-marked paper ballots, a spoiled ballot station, and six tabulators to move voters through the voting process. The election was set up and managed by the WCEC.

Election-related observations.

9. Since my expertise is centered on county elections, I will focus most all of my insights on the election process. **The foundation principle here will be to compare what occurred at the convention's election to how the Williamson County Election Commission (WCEC) normally conducts an election for the county or cities**. What is their process that I have encountered as a poll watcher and researcher into the elections executed by the WCEC and how does that compare with the election process seen in the WCRP convention? The WCEC's customary election processes should guide their actions at the WCRP convention and election.

10. **In Jonathan Duda's affidavit of March 18, 2025**
    10(A). Page 1 "Per the Understandings" item #1: Providing ballots.
    I understand there were a number of comments on the Williamson County "Conservative's" (WCC) social media complaining that the ballot was confusing and led to many spoiled ballots and other voting issues. As per Mr. Duda and eyewitnesses, the WCEC designed, printed and delivered the paper ballots for the election. The WCEC had to ensure the size of the type and layout would match up with the scanner in their tabulators which would be used to count the ballots. That's why the WCEC handled all design and production efforts, as they do for all Williamson County Election Commission elections. Any issues relating to the ballot were the responsibility of the WCEC, not the WCRP or TNGOP.

10(B). Page 1 "Per the Understanding" item #2: Voting area limited access.

During the time that I personally voted, there were two individuals at the front door to the voting area, both checking wristbands. A third person, WCC Assistant Secretary Drell Floyd, was about three feet beyond the first security, shaking hands and obviously watching the front door during the voting. I had to show my band to both security officers. I saw no one entering the room without a wristband. And the exit was covered by a tall security officer who wasn't allowing anyone in.

10 (C). To Mr. Duda's observation in his statement titled the "Observations of activities that deviated from agreed upon Understandings" item #1 that "individuals not voting regularly entered and exited the room," I would ask:

- Who were these individuals? What were their names? How many? When?
- Did they have an access lanyard or name badge on that Mr. Duda didn't see?
- When I was voting, Mr. Duda was inside the vote center working the incoming crowd, directing people to a privacy booth to mark their ballots. He so directed me. How could he even notice people coming in or out and be so sure they weren't eligible voters who had yet to vote or were leaving after voting, like me? Or election workers?
- Was it Chris Burger, one of the WCC poll watchers who, according to other statements from WCRP workers, was in and out of the vote center on at least five different occasions? How about workers needing a bathroom break?
- Ali Adair's statement (item at the bottom of page 7) named Donna Clements as a worker in the vote center, but I never saw Ms. Clements in the poll when I was there. I feel sure there were others who were working at the vote center that most likely flowed in and out, but without identifying them, Mr. Duda's statement is merely a speculation and wouldn't hold up in a court of law.

10(D). Page 1 "Observations of activities that deviated... Item #5: The additional (provisional) teams did not appear to be given any instruction, which created confusion."

This completely contradicts the statement of eyewitnesses and workers who were in the room and doing their assigned jobs. The provisional teams were personally trained by Mr. Duda the previous day, with responsibilities discussed for one provisional team member to cut the voter's wristband and placing it in a bag next to the table and the other to hand a ballot to the voter and direct him/her to the privacy booths to mark their ballots. Many also drew attention to the directions to fill in the oval, information of which was written on the ballot. Additionally, more eyewitnesses and election workers, Kevin Fuller and Steve Giraud, affirmed that Mr. Duda also trained them and additional workers the afternoon of the 4th before the convention started. Except for cutting wristbands, this is essentially what happens in a WCEC county election involving Williamson County voters.

10(E). Page 2 "Additional observations" Item #1-3: Handling all ballots and artifacts after the election and the next section "Incidents pertaining to handling of unused ballots and spoiled ballots" Item #1.

As Mr. Duda's statements confirm, the ballots never left the vote center. They were handled, voted on, corrected, tabulated, removed from the blue bins inside the

tabulators and hand counted in this 20' x 40' room. All in front of poll watchers, judges, the WCEC employees and a representative of each slate. Only when the spoiled ballot envelope was placed in the box with the unused ballots and the voted ballots placed in another box at the end of the election were they all handed directly to the TNGOP. Again, in front of witnesses in a small room.

10(F). Page 3 "Incidents pertaining to the handling of unused and spoiled ballots – the Infamous 'burning of ballots' claim by the WCC."

In post-election social media posts and email reports to "their voters" (such as their email on Sunday, March 9, 2025 at 4:11 p.m.), the WCC went out of their way to make much to do about an utterance attributed to WCC Judge Moonhee Bischof concerning "burning ballots." Yet, it was Mr. Duda, in his affidavit (Top of page 3, item #2) who said in discussing with the WCRP staff what should be done with the approximately 1,200 unused ballots, that he "advised that they (the extra ballots) could be shredded or burned." It was Mr. Duda who first said "burning the unused ballots" was acceptable. I suspect that the WCC person who claimed they heard Ms. Bischof say to "burn the unused ballots" actually heard Mr. Duda explain that option to the WCRP team. Or Ms. Bischof merely repeated what Mr. Duda had said... and affirmed in his statement.

11. From the WCC's brief of March 18, 2025 Section B "Election Security and Integrity Violations."

11(A). Early opening of Registration and Convention Floor.

I can't ascertain exactly why registration began early. I do know from some eyewitnesses, however, that many of the workers were reporting to the registration table between 4:00 and 4:15 p.m. to pick up their badges/lanyards to work the election. But with other comments in statements from individuals like Kilynn Schueler ("4:15 there was a line of people in the registration line") and Kimberly Calcote ("The lobby/hallway area was completely full and lines were to the door prior to 4:30.") that the area was packed and from a crowd control/safety standpoint in my judgement it was a prudent move on the part of the WCRP to begin registration a little early.

Similarly, it's likely the voting started early to alleviate the congestion from an overflow crowd. As poll worker Kevin Fuller said in his statement, "I did notice prior to 6 p.m. that there was already at least 40 or 50 people waiting in line to vote." I assume again that the move to allow people to begin voting earlier than planned was to handle the crowd and to ensure the safety of voters, some of whom wanted to return home before severe weather was expected to hit the area.

The important point, though, is that starting the voting early had no impact on the outcome of the election.

11(B). Open access to voting/count room.

My experience with the vote center appears to be the opposite of many of the WCC statements. When approaching the front door of the vote center there were two security guards checking wrist bands. One was a younger man about five feet in

front of the door. A second was a larger man standing in the doorway, also checking wrist bands. Additionally, WCC candidate Drell Floyd was about ten feet in front of the door shaking voters' hands and seemingly watching the door's access. However, in my experience, the voting process was very orderly. My wife and I stepped in, our wristbands were cut, we were given a ballot, told to fill in the circles, and directed to the voting privacy booths (the same ones that were used at the 2023 convention), we voted and slid our hand-marked paper ballot into the tabulator.

In fact, after I had voted, I stepped into the corner where the exit door security guard told me I needed to leave. I said I was waiting for my wife, and he told me I could do so in the hallway outside the vote center. He was firm and I did exactly what he said. From that exchange, I find it farfetched that people "were coming and going at will through the exit door" as Brian Floyd said in the WCC brief.

I do know from other eyewitnesses that the second WCC poll watcher/judge Chris Burger (apparently the first poll watcher/judge from the WCC never showed up) went in and out of the room a number of times, although that is never mentioned in Brian Floyd's statement. It is interesting that these individuals/delegates who supposedly entered and exited freely were never named or identified. If this occurred before the convention, as Kimberly Calcote declared in her statement, how does she know if the people weren't poll workers?

I have personally confirmed with a poll worker that the doors to the vote center were NOT open prior to the start of voting. Unless, that is, a WCEC worker or poll worker was entering or leaving the poll.

Keep in mind, with typical WCEC elections there are no security guards at either the front or exit doors. You do have to sign a registration slip, show it to the registrars who find you in the voter roll and give you a ballot that you use in the ballot marking device and tabulator. This election did have more security, but less machinery than typical WCEC elections. When I was voting, I did not witness any people "coming and going as they pleased."

11(C). Questionable handling of spoiled ballots.

When a ballot is spoiled in an official WCEC election, that ballot is checked by a registrar and/or the poll official and then marked as spoiled and placed in an envelope near the poll official. At the evening's close of the election, the envelope is sealed, and a chain of custody document is affixed as the envelope is returned to the election center with the bins of voted ballots. The spoiled ballots are never presented to the WCEC election poll watchers unless we ask to see them. The WCEC does not proactively come to us to show us election artifacts. And as eyewitnesses confirmed, Election Administrator Chad Gray had the spoiled ballot envelope all night, and it didn't leave his possession until it was handed to the TNGOP at the close of the evening. It was done by the book.

Additionally concerning the spoiled ballots, while the instructions were printed on the face of the ballot and the provisioning workers explained (and in some cases showed the template model) how to correctly mark the ballots, I understand from

the WCEC at their March 7th meeting that there were smiley faces and other images drawn on some ballots, along with circled, checked or other markings around the ovals. These cavalier mismarks led to the ballots being spoiled.

12. The right to a recount and examination of election artifacts.

The claims from the WCC candidates that they were not "afforded the right to request a recount or examination of spoiled ballots" (Kimberly Calcote, Michelle Sutton, Patti Carroll and Ali Adair all mentioned in their statements) fall flat when compared to the processes of all WCEC elections.

In official WCEC elections, the candidate MUST ASK for a recount or examination of spoiled ballots. It is not the job of the WCEC to approach the candidate and ask if they want a recount or see certain election artifacts. It is the candidate's responsibility to ask to see any documentation, questionable voter, machine problem, or anything that might be of question.

Same if a candidate wants to formally contest a county election (see TCA 2-17-104) or seek a recount. They must approach the WCEC; the WCEC does not approach them. So, again, the process here was performed by the book. The candidates themselves had to ask for a recount or to see artifacts. No WCC candidate other than Brian Clifford requested a recount. And he got his recount. If other candidates wanted a recount, then Brian Floyd (the campaign's manager per item #4 in his declaration) should have approached each member of the WCC slate and advised them to ask the WCC or TNGOP. As a professional campaign manager and campaign manager of the full WCC, Brian Floyd knew or should have known about this protocol. Based on his declaration (item #29), he did not inform the other WCC candidates that they needed to request a recount of their race.

13. Chain of custody breakdown.

As mentioned above concerning candidates wanting to examine certain election artifacts, the responsibility for checking the chain of custody is on the candidate, not the WCEC or the WCRP. Same as in typical WCEC elections.

As a citizen who checks into all aspects of a county election -- the ballot marking device and tabulator machines, seal numbers, vote tallies, tally tapes, poll worker worksheets, cast vote records, log files, poll incidents, audits, etc. – I have to ask before and after an election for that data/information. In fact, I must fill out a public records request. It is not given to me proactively by the WCEC, even though they know from more than ten elections that I'm going to request such artifacts. The responsibility for such a request is on myself, the citizen or the candidate, not the WCEC.

Same with chain of custody. It is the responsibility of the WCEC to implement chain of custody documentation, not the WCRP or TNGOP. But it's the responsibility of the candidate to ask to review it.

Chain of custody is usually and especially employed when election materials move from one location to another. For instance, when USB sticks from a voting tabulator

or paper ballots leave a poll location and travel to, say, the election office for handling/counting. Similar to when a urine drug test sample is leaving where the urine is drawn and going to the lab where it is analyzed. In this case, though, none of the ballots -- spoiled or otherwise – ever left the 20' x 40' voting location. As Mr. Duda reported in his statement, the spoiled ballots were immediately placed in an envelope during the election and held by Election Administrator Chad Gray. The used/unused ballots were placed in boxes at the close of the election and then given to the TNGOP. All in that 20' x 40' room, probably mere feet away from the WCC's poll watcher, as well as all WCEC officials.

14. Different colored wristbands.

It will need to be left to the CCC to explain this, but from other eyewitnesses I know that the WCC ran out of wrist bands before March 4th and needed to quickly get more from several different sources. This was possibly due to the WCC's withholding their registrations until the very last minute before they sprung them on the WCRP for handling. The attendance number exploded.

15. Campaigning and electioneering in voting areas.

My experience in the vote center was that I saw no campaign literature for either the Elevate or WCC slates when I arrived to vote. It may be that such information – usually held by voters so they will know who to vote for – might have been accidentally left behind at a vote privacy booth, but the election workers were obviously working to keep the area as clear of such information as possible while performing their other tasks.

This is exactly what occurs in a typical WCEC election.

Concerning electioneering, it is interesting that Brian Floyd's document overlooked that WCC candidates were electioneering. I saw both Brian Clifford and Drell Floyd working the voting lines while people were on the way to vote. Mr. Floyd was feet away from the front door to the vote center and Mr. Clifford was next to the line just before it turned out of the ballroom and into the hallway leading to the vote center.

16. Candidates were not allowed to appoint delegates to observe the vote counting.

Brian Floyd's document is overlooking the fact that in addition to the WCEC personnel who were monitoring the process, both slates were allowed to have two observers or poll watchers in the vote center during all voting and counting and one representative during the recount. I understand that one of the WCC watchers never showed up and the second watcher for the WCC – Chris Burger – was in and out of the room during his time as a poll watcher/spoiled ballot judge. As Mr. Duda pointed out in his "Understandings" contract, the six individuals from the WCEC who were in the room at all times are all election professionals – Mr. Duda (Commissioner and former Spring Hill elected official), Donna Choate (Commissioner), Chad Gray (WC Election Administrator), Tony Clifford (Republican machine technician) Rebecca Cundiff (WCEC election system specialist) and Bob Brown (former chairman of the WCEC and currently an election auditor with the State Division of Elections). I understand that from time to time, TNGOP Chairman Scott Golden also was in the room watching the proceedings. I doubt any unusual

occurrence would have gotten by all of these election professionals in that small room.

17. **Kimberly Calcote statement: Media on the convention floor. Loud audience. People moving in & out of voting room.**

    Regarding Ms. Calcote's complaint about Romonte Hamer, Sarah White, Matt Masters and other media which she said were unqualified participants on the convention floor, the WCEC has a policy that enables members of the media to cover an election. All three of these individuals are members of the media. As were others covering the convention.

    Ms. Calcote also claimed that when the elderly and disabled were allowed to line up early to go vote while some candidates from both slates were speaking, "it was extremely loud and distracting for those trying to listen to speeches and for those giving their speeches." Personally, I have hearing issues and wear hearing aids and was sitting towards the rear of the room. I had no problem hearing the speakers. The presence of two large TV screens also helped aid my understanding.

    According to item #12 in Ms. Calcote's statement "I observed people moving in and out of the voting center and count room before the convention started. This room was not in any way secure." Unfortunately, she did not give any names or further details or evidence about this. Or even pinpoint what room in the Marriott she was talking about as there were other rooms near the registration area used for the convention. Prior to the convention, there were workers and poll workers/judges from both slates moving in and out of the vote center. They were also picking up their registration identifications. One provisioning worker confirmed to me personally that the door of that room was not open fully until people began to vote.

18. **Michelle Sutton statement: Unsure how to feed my ballot into the tabulator.**

    Ms. Sutton says: "I was told 'I don't know' by one volunteer and then told it does not matter by another volunteer. I later had a friend tell me they were told it had to be fed face-down for it to count." I find these two statements to be somewhat questionable. All of the workers working next to the tabulators were WCEC election professionals. This according to WCEC Chairman Jonathan Duda in his "Understandings" document. They would know that in any WCEC election it does not matter how the ballot is fed in. The ES&S scanner will read the ballot since the tabulators are made to read both hand-marked paper ballots and the typical slim ballot marking device ballots either face-up, face-down, backwards or forwards. Donna Choate was working at the tabulator where I voted, and she suggested as a courtesy I load it face-down so she would not be able to see how I voted.

19. **Patti Carroll statement: No checks in place to verify the credentials for convention floor. Also all election workers supported my opponents. Using paper ballots might invite problems.**

    I had the opposite experience when I registered and attempted to enter the convention hall. A young man stopped me at the convention door and asked to see my wrist band. This was approximately 5:15-5:25 p.m.

Regarding her statement "From all accounts, the people working at the WCRP Reorganization Event all supported my opponents." I ask how does she know this? Did these people tell her that? Who were they specifically and what were they doing that even made her think that? Like every WCEC election, no worker was allowed to wear any campaign identifiers, share campaign literature or talk about the election with voters. Personally, I found staffers exceptionally professional.

Regarding her statement "Paper ballots are usually dependable but can have errors unless carefully hand counted. This did not happen on the night of March 4th." Ms. Carroll apparently is unaware that a hand re-count of the chairman's race occurred immediately following the close of the election. In that recount, the hand-counting identified three votes that should have been allocated to Mr. Hickey but weren't by the machines. And Mr. Clifford lost one vote. This was confirmed by the statement of Mr. Jonathan Duda, the WCEC Chairman at the March 7, 2025 WCEC meeting. He ran the convention's election. Mr. Hickey's ending vote total was 798 (versus 795) and Mr. Clifford's ending vote total was 750 (versus 751).

20. James Galbreath statement: I didn't receive a qualified participation notification.

Mr. Galbreath makes this claim in his statement. But he affirms his wife received notification of such from: noreply@123formbuilder.com. If Mr. and Mrs. Galbreath had registered directly through the WCRP, then they would have received either an acceptance email like I personally received or a rejection email from the CCC. Just like Bob Brown and Patti Carroll received. It appears Mrs. Galbreath's response came from the WCC's list builder program. No idea why Mr. Galbreath didn't get one.

I suspect that the Galbreaths THOUGHT they were registering with the WCRP because the misleading language surrounding the WCC's QR code on their mailers seemed official. But they were actually registering directly with the WCC, as the small type underneath the QR code directed voters to contact www.williamsoncounty conservatives.com and most people wouldn't have made that connection. The WCC was using the Galbreath's information to build their mailing list.

I suspect the Galbreaths were never officially registered with the WCRP until after the WCC made a huge dump of names from their registration mail list to the WCRP at the very last minute. Most likely that's why Mr. Galbreath didn't get any follow-up emails from the WCRP. He hadn't been registered yet with the WCRP. The CCC had to work overtime to establish bona fides on those names. One legal question surrounding this was whether or not the WCC requested or obtained the voter's permission to capture their personal information. I doubt they did.

21. Robin Baldree statement: Confusion.

Addressing several election-related misconceptions in her statement, the guard at the door to the voting room wasn't cutting off wristbands. He was a security guard CHECKING wristbands to ensure only eligible voters were allowed in the vote center. Per the instructions from WCEC Chairman Jonathan Duda, who was overseeing the

election, Ms. Baldree's wristband wasn't cut off until she entered the vote center. This was certainly my experience when I voted.

When she received from Chris Richards her ballot that contained voting instructions written at the top, Mr. Richards or Mr. Duda or Election Administrator Chad Gray would point her to a privacy booth to mark her ballot. Again, my personal experience.

The privacy dividers that apparently concerned her were the same ones used in the 2023 Republican Reorganization convention, and they are standard for elections across the county. The WCEC, however, uses larger and less portable privacy booths for their elections.

22. **Bob Brown's complaint about his initial denial of bona fide status.**

Instead of following the instructions on the letter from the WCC that he and Patti Carroll received concerning their possible non-bona fides -- to contact Credentials@WilliamsonGOP.org to clear up any misunderstanding -- or even contacting the WCRP or the TNGOP himself directly to clear up the issue, Mr. Brown went straight to the WCC to provide them an excuse to further blow up a situation (that was later resolved) into an issue for the WCC to use post-election against the party and the CCC. This was right in step with the WCC's strategy. To me, this shows intent to cause additional problems for the party which could be used in a complaint against the convention should the WCC lose. And it certainly is not the way a true election professional would have handled the situation.

It's interesting that WCC Candidate Patti Carroll took the opposite – correct -- path, writing in a Monday, Feb 17, 2025 email to Cindi Miller asking the denial to be reviewed again. This email can be found in the WCC supporting documents file. I would suspect that were Mr. Brown the chairman of the WCRP or CCC he would have wanted people to take Ms. Carroll's approach instead of the approach he took.

Additionally, with the help of WCC strategist Aaron Gulbransen, who is a former political editor of the Tennessee Star media organization, Mr. Brown then went to the Tennessee Star with his story to further aggravate the situation. Note the headline of this story here. Is this an appropriate action from a Republican and former chairman of the WCEC?

By the way, it should be mentioned that Mr. Robert D. Brown (State voter #53881 and the only Robert D. Brown in the Williamson County voter roll) has a son, Robert D. Brown Jr., (State voter #387502). Robert D. Brown, Jr., is not bona fide. Mr. Brown Sr. never mentioned this as a possible reason for the mix-up.

Conclusion

23. As I stated earlier in this declaration, after years researching elections, compiling election integrity documentation, poll watching, media coverage about election integrity and attending and speaking at election commission meetings and podcasts, I have an active

understanding of how elections occur. In addition to offering insights that I personally witnessed at the March 4, 2025 convention/ election, I wanted to provide understanding as to what the normal procedure would be in any Williamson County election conducted by the Williamson County Election Commission. With few exceptions, this election appeared to mirror other typical elections in the county.

24. **My foundation principle was to compare what occurred at the convention's election to how the Williamson County Election Commission normally conducts an election for the county or cities.**

I hope I have provided greater insight into this event.

Frank M. Limpus, Jr.
Franklin, TN

3/25/25
Date

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