

To the members of the SEC:

My name is Dr. Tracy Miller, I am the Past Chair of the Williamson County Republican Party, and I am rebutting the wild accusations laid against all of us in the challenge of our most recent Reorganization. I have chosen to insert my response after each section. I will format those responses in bold and with underscore so you can find them quickly. Thank you, in advance, for your time and consideration.

**BEFORE THE STATE EXECUTIVE COMMITTEE
OF THE TENNESSEE REPUBLICAN PARTY**

IN THE MATTER OF:

Contest of the Williamson County Republican Party 2025 Reorganization Convention

CONTESTANTS:

Brian Clifford, Alexandria Adair, Drell Floyd, Patti Carroll, Michelle Sutton, Steven Tyler
Giorno, Kimberly Calcote, and Rob Verell (the "Contestants")

CONTESTEES:

Steve Hickey, Diane Chenard, Elliot Franklin, Courtney Laginess, Tim Raynaud, Brandon Bell,
Leigh Ann Cates, and Peg Raciti (the "Contestees")

**BRIEF IN SUPPORT OF NOTICE OF CONTEST
SUBMITTED MARCH 18, 2025**

INTRODUCTION

This brief is submitted on behalf of the Contestants, the eight members of the Williamson County Conservatives ticket, in support of the Notice of Contest filed on March 9, 2025, challenging the validity of the Williamson County Republican Party ("WCRP") Reorganization Convention (the "Reorganization Convention") held on March 4, 2025. The Contestants respectfully request that the State Executive Committee vacate the results of the March 4, 2025 Reorganization Convention, appoint an unbiased temporary chairman, and call for a new Reorganization Convention that complies with the Tennessee Republican Party ("TRP") Bylaws. The evidence presented herein demonstrates that the WCRP 2025 Reorganization Convention was conducted in flagrant violation of TRP Bylaws and Rules in at least three critical areas: (1) failure to adhere to the TRP's bylaws governing reorganization, (2) disregard for standards of election security and integrity, and (3) conflicts of interest among those conducting the elections.

STATEMENT OF FACTS

The facts demonstrating the invalidity of the WCRP Reorganization Convention are well-documented in multiple declarations as well as in numerous statements from affected delegates and participants, and the Notice of Contest dated March 9, 2025.

A. Procedural Violations

1. Failure to Hold Reorganizational Meeting by January 30, 2025

TRP Bylaws Rule E, Part I, Section 3A requires: "On or before January 15th of each odd numbered year, the County Chairman shall call a meeting of the CEC 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."

Answer: We were given a waiver by Chairman Golden

Chairman Tracy Miller failed to comply with this requirement, instead improperly calling the WCRP's Reorganizational Meeting for Monday, February 3, 2025, in clear violation of the TRP Bylaws. The Bylaws further provide that 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." State Party Chairman Scott Golden failed to do this, and therefore the entire WCRP Reorganization Convention was conducted in violation of TRP Bylaws.

The answer is the same as previous: We obtained a State Party waiver to delay four days so this event would coincide with our “widely known” Monthly CEC Meeting. This was hoped to increase attendance and transparency.

2. Time and Place of Reorganization Convention Not Properly Set

TRP Bylaws Rule E, Part I, Section 3B requires: "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 WCRP set the date and place as March 4, 2025, at the Factory in Franklin; however, the time was not fixed and was instead stated as "To Be Determined." The time was only announced over a week later, in violation of TRP Bylaws.

Moreover, declarations from multiple Contestants and delegates confirm that after the place was fixed as the Factory in Franklin per the Bylaws, the Convention was moved to the Cool Springs Marriott. There are no provisions in the TRP Bylaws for moving a fixed place of a Reorganization Convention.

Admittedly, there were some historic firsts that made the logistics difficult. Given the fact that a record number of attendees were expected, in numbers that far exceeded all previous Reorganizations, the Head of the CCC was hesitant to commit to exact details other than day, place, and “approximate” time. This was as wise as it was prescient given all that occurred. The Williamson County Conservatives campaign was using a private QR code to redirect registrants, which made perfect planning impossible. When all these suspicions were verified, again, a State Waiver was obtained to move the event to a larger venue. This is hardly a rare occurrence; in fact, the previous Reorganization of Chairwoman Cheryl Brown moved venue, time, and date far closer to the deadline and with less notification. Please note: Points 1 and 2 are rendered moot via the State’s Waiver, inconvenienced both campaigns equally, and would not alter the election in any way.

3. Secret Meetings of the Contest and Credentials Committee

TRP Bylaws Rule E, Part I, Section 6B6 requires the Contest and Credentials Committee to "Allow the public to attend all of its meetings."

Contestants confirm that they never received any notice of meetings by the WCRP Contest and Credentials Committee, nor was any notice of such meetings publicly provided. Multiple candidates for WCRP offices never received notification that they had been qualified as candidates after properly submitting their intent to run, demonstrating the secretive nature of the Committee's proceedings.

Alexandria Adair declared: *"At no time did I ever receive an email from Debbie Deaver, any member of the Contest and Credentials Committee, or any member of the WCRP or TRP informing me that I had qualified as a candidate to run for 1st Vice Chair of the WCRP."*

Michelle Sutton declared: *"I was never notified by Dr. Miller, the Contest and Credentials Committee, or any members of the State Executive Committee that I was approved to run for the WCRP Executive Committee after filing my intent to run for Treasurer."*

Speaking to these accusations, as best as I am able, it is my understanding that the CCC, after its initial meeting, worked off of the exact same division of duties as it performed in the District 10 Convention. Indeed, their previous experience is invaluable and it is why I nominated them. And thus, they worked in already formed small groups, or via individual phone calls. And to suggest that the meetings were instead held in “secret” is the same kind of hyperbolic accusation we have patiently endured from this group. If there was chaos in this process, I once again suggest it was due to the Williamson County Conservatives campaign tactics,” such as the bogus QR code. Finally, it was my understanding when I thanked the candidates for submitting to run, and when I forwarded their request to both the State and the CCC of their intent to run, that I was fulfilling the Bylaw requirement. Please note: that the Williamson County Conservatives were, in fact, attempting to obtain an edge against their opponents via the bogus QR; meanwhile, tardy notification, if it occurred, happened to both sides equally and would have in no way altered a single vote or changed the election in any way.

4. Non-Delegates Permitted on Convention Floor

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

Multiple declarations and statements confirm that during the Convention on March 4, 2025, many individuals who were not delegates were permitted on the Convention floor. Numerous delegates observed that there were no consistent checks in place to verify credentials of individuals entering the floor. Multiple delegates reported seeing people without wristbands on the convention floor, and several delegates noted they were able to enter the convention area multiple times without having their credentials checked.

Kilynn Schueler stated: *"Not only did I see several people entering the space through doors with no security, but I entered the room myself at least 4 times without anyone stopping me to check my bands. I entered through doors with no security. There were only 2 doors with anyone to check wrist bands to assure only Bonafide people were allowed in the room. There were 10 doors into the room."*

Jane Kopf stated: *"We were surrounded by people in the ballroom who had no wrist bands but were loud and rude when our candidate spoke."*

Once again, given the historic nature of this event and given the Williamson County Conservatives deliberate tactics to hide the numbers of actual attendees until the very last moment, as well as their dumping in duplicate registrations, as well as creating numerous fraudulent registrations, into the pool of people needing to be properly vetted, they assured that perfect planning was impossible. Indeed, this almost seems to have been their goal. We needed the full size of the Marriott’s convention room, to accommodate sufficient chairs for attendees, which unfortunately meant that there were also an abundance—per safety codes—of entrances and exits. True, I cannot speak for all the doors, at all times, but I can say we had five deputies and a record number of volunteers assigned to maintaining security, integrity, and order. The only incidents that reached me were, in fact, that the Williamson County Conservatives had rented a hospitality space, where there was alcohol, and that several of the people coming from this location attempted to bluster their way past our

volunteers, issuing both verbal and physical threats. For the sake of full disclosure, three reporters were given permission to attend—this, again, was thought to enhance integrity and transparency—as well as staffers for attending dignitaries like Governor Lee. The staffers were told to wait outside, but some may have entered to assist the Governor. Please note: there were other safeguards in effect to protect the vote—such as the voting being at a controlled, second location—and that this claim, even if true, would have affected both sides equally, and would not have altered the election.

5. Improper Election Procedures

TRP Bylaws Rule E, Part II, Section 4 provides a specific order of business at the County Reorganization Convention that "**must be as follows.**" This includes holding the Chairman's election first and separately, then having the new Chairman preside over the Convention and elections of remaining offices.

Multiple declarations from Contestants and statements from delegates confirm that this did not happen. Instead, the Chairman's election was delayed and voted upon simultaneously with the other seven executive committee offices up for election on a single ballot. Voting occurred throughout the Convention rather than in the sequence mandated by TRP Bylaws. Several delegates observed that voting began while candidate speeches were still ongoing, with many delegates casting votes before hearing from all candidates. The outgoing Chairman continued to preside over the entire convention in clear violation of the bylaws.

Williamson County Elections Commission (WCEC) Chairman Jonathan Duda independently observed: "*WCEC was asked by Debbie Deaver to open voting at approximately 6PM, while Chairman Miller was still providing a welcome, prior to the time allotted for candidates to speak.*"

Kimberly Calcote declared: "*The vote for the Chairman of the WCRP was not held separately. All eight contests were included on one ballot. Tracy Miller continued to preside over the convention in violations of the bylaws of the Tennessee Republican Party and oversaw my election, which under the bylaws should have been done by a newly elected Chairman, as it was done in previously attended Republican Conventions.*"

Patti Carroll declared: "*Voting for candidates at the WCRP Reorganization Event all took place at the same time on the same ballot. The election for Chairman did not take place first or separate. I also have concerns with them allowing voting to start before all the candidates have got to speak. Additionally, they changed the speaking order of the candidates midway, which created confusion for many people who came to vote for a certain slate.*"

Again, given the fact that we had such a record number of attendees, making them file through the voting line twice would have been too much for voters with disabilities or time constraints. And given the fact that the Williamson County Conservatives claimed that we were intent on disenfranchising voters, we asked the State Party for a waiver to combine the ballots to ensure maximum voter participation. Since Chairman and First Vice Chairman Candidates for both groups fulfilled the Bylaw section on gender requirements, the waiver was granted. Please note: this State authorized waiver affected both campaigns equally, and it did not in any way alter the course of the election except to allow “all” voters a chance to participate.

6. Candidates Denied Right to Appoint Observers

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

Other than Brian Clifford, the other seven Contestants confirm that they were never afforded the opportunity to have a delegate present for the vote counting, providing further evidence that the election was improperly conducted. Despite specific bylaws guaranteeing this right, the Contest and Credentials Committee operated without proper oversight from candidates or their representatives.

Michelle Sutton declared: *"At no time was I ever offered the opportunity to have a delegate serve as an observer for me inside the voting room or to observe the counting of the ballots."*

Kimberly Calcote declared: *"At no time was I ever presented the opportunity, as is stated in the bylaws of the Tennessee Republican Party, that I could appoint a delegate to watch votes being conducted, counted, review spoiled ballots, challenges that people had completing ballots. In fact, when we had someone from our team overseeing the recount, he was never even notified that there were spoiled ballots, so we had no way of seeing those ballots to see how they might have impacted the election."*

It is my understanding that the CCC offered both slates the opportunity to appoint observers, and, in fact, some of those positions went unfilled by Williamson County Conservatives slate. Please note: that both slates were given an equal number of appointed observers, and thus, no advantage was given either way.

B. Election Security and Integrity Violations

1. Early Opening of Registration and Convention Floor

Registration for the Convention was scheduled to begin at 4:30 pm. However, declarations from multiple Contestants and delegates confirm that registration desks were already open and operating by approximately 4:00 pm, with no notification to the Contestants. Furthermore, the Convention floor was already open at approximately the same time, with people entering and exiting freely. This early and unannounced opening provided an unfair advantage to the Contestees who apparently had been informed of the early opening along with their supporters.

Brian Clifford declared: *"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."*

Kilynn Schueler stated: *"The doors were said to open at 4:30. As I had arrived at 4 pm I went to register. When I arrived around 4:15 there was a line of people in the registration line. Looking in the room there were 30 or so people already in the room. Only the people running the campaign and their supporters seemed to have known the doors would open at 4. Those of us helping with the Williamson County Conservative slate had no idea."*

I find it ironic that the Williamson County Conservatives, through the use of an alternative QR registration, dumping names in at the last moment, dumping in fraudulent registrants and duplicates, want to turn around and decry the very process they created. Yes, there were a record number of people flooding in, and yes, we handled it in the most efficient manner possible. I cannot speak with total certainty if people started helping the crowd that was trying to push its way in a few minutes early, either redirecting them to the proper line or assuring them they were already in the correct one. I do know people with disabilities were helped early on. This seems fitting since the Williamson County Conservatives accused us before this event of trying to steal votes from the elderly.

Nevertheless, neither side was made aware of this process. Unfortunately, the Williamson County Conservatives project deception everywhere they look. Please note: while the actions of the Williamson County Conservatives largely created this slight temporal irregularity, both slates were on, otherwise, equal footing. This caused no change in the votes or in the election.

42. Open Access to Voting/Count Room

In a grave breach of election security, multiple declarations and statements confirm that people were seen coming and going as they pleased from the voting/count room through its exit doors. With forty voting stations and Contestants (other than Brian Clifford) denied the ability to have observers in the room, there is no way to verify whether anyone voted more than once, voted who should not have, or removed ballots from the room. Several delegates reported entering the voting area without proper credential checks, and some observed non-credentialed individuals inside the voting room, including some individuals who were cutting off wristbands deep in the voting area rather than at the entrance.

Elections Commissioner Duda observed: *"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 it. This was contrary to the procedure the WCEC had in place..."*

Kimberly Calcote declared: *"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 as the doors were propped open allowing people to come and go. We even had a friend accidentally walk into the room thinking that she was attending our hospitality suite."*

There are two issues here, so I am unclear as to how to address this. First, there is the claim that the room wasn't secure. The room was secure. The doors were monitored at both the entrance and the exit. I can only assume that these "friends from the hospitality suite" wandered in while the voting room was being set up and security was not yet in place. In addition, to this particular point, some of the Williamson County Conservative's observers entered and left repeatedly, despite requests that they refrain from doing so. Second, there seems to be the claim that a fouled ballot was mishandled. We had the Election Commission conducting the entire process. They even quote Jonathan Duda, the Election Commissioner, who caught and noted the error. This is an example where the multiple safeguards worked. Please note: that this was a record setting event, manned by volunteers, monitored by elected officials and the CCC, but could someone momentarily mishandle a spoiled ballot? Perhaps. Would it have been witnessed and corrected? Clearly so. Did this unfairly affect either side more than another? No. In addition, much dispute has occurred—after the fact—over spoiled ballots; however, correcting them means the election had a more accurate vote and errors were corrected.

3. Questionable "Spoiled" Ballots

A staggering 137 ballots (8.8% of all ballots cast) were deemed "spoiled" due to voter errors and allegedly "cured of their errors" before being tallied. Multiple declarations confirm that these "spoiled" ballots were not presented during the recount of the Chairman's race for inspection.

The number of spoiled ballots (137) exceeds the margin of victory in all eight contested races, making it impossible to determine if they were indeed "spoiled," accurately transcribed to new ballots, or even properly tabulated at the Reorganization Convention. Multiple delegates reported confusion about the ballot completion process, with contradictory or absent instructions leading to errors. Delegates also observed unauthorized individuals taking ballots to "fix" them without proper oversight.

Jane Kopf stated: *"I saw an Elevate supporter take the ballot from the voter beside me and take him and his ballot to 'fix' it."*

Once again, we used ballots and tabulators set up and overseen by the Election Commission. We invited a vast number of SEC, at least ten, representing Williamson County and from other counties, to monitor the entire process. We had three members from the State Party Office, including Chairman Golden, Ginger Morrow, and an intern helping to register and trouble-shooting any and all claims of errors in the State's voting record. We had a representative from the RNC moving from area to area as another unbiased monitor. We had multiple County Commissioners, at least five if memory serves, checking registrants for armbands and checking identification. We had deputies specifically assigned to the voting area. We had four volunteers helping make sure that no one violated the orderly process. Please note: it is my understanding that someone from the Williamson County Conservatives campaign was placed in the position to oversee these spoiled ballots. Thus, if an edge was given here, which there wasn't, it would have to be attributed to the Williamson County Conservatives.

4. Chain of Custody Breakdown

Records regarding the chain of custody for blank ballots, voted ballots (including the 137 allegedly spoiled ballots), and remaining blank ballots were never provided for inspection. Similarly, no information was provided regarding the wrist bands issued to voters, including their serial numbers or the total count issued and remaining. Multiple delegates reported seeing different colored wristbands being used without explanation, raising questions about the credentialing process. Additionally, delegates observed that there was no system in place to collect the removed wristbands or to mark voters' hands to prevent repeat voting.

Michelle Sutton declared: *"I inquired about the different colored wristbands and what they meant and was told 'I do not know'... At no time was I ever allowed to inspect the logbooks of who registered or checked in, examine the wrist bands and their serial numbers, or examine the spoiled ballots from the election."*

Brian Floyd declared: *"Upon exiting the voting center, my hand was not marked, stamped, or otherwise identified as someone who had already voted as would be standard procedure to prevent repeat voting. I did not witness hands being marked on any other delegates either, as would be a standard election security procedure."*

My understanding is that Jonathan Duda and his team maintained strict control of the spoiled ballots, placing them in official bags with seals, handing them to the representatives of the CCC. Simply put, there were no violations in the "chain of custody." When the Williamson County Conservatives demanded a recount, the sealed ballot bags were supposed to be taken to the Offices of the TNGOP for safekeeping. When the Williamson County Conservatives rejected this idea, alleging that they wouldn't be safe there, the SEC

created a multi-member committee to count the votes, then and there, under the observation of both parties. These were SEC members who represented six different counties in the State, and the majority didn't even know the names of the candidates for either side. Again, despite their insinuations and accusations, every demand of the Williamson County Conservatives was met and satisfied on the spot. No ballots, spoiled or otherwise, left the room or the eyes of the witnesses until their demands were met. Please note: again, both sides were treated equally—although it might be suggested that the Williamson County Conservatives were allowed to direct the process to a far greater degree than their opponents.

5. Bona Fide Republicans Denied Right to Vote

Multiple declarations and statements confirm that individuals working the registration tables (all of whom openly supported the Contestees) improperly turned away bona fide Republicans without allowing them to appeal the denial of bona fide status or examine their voting records. Several delegates with long histories of Republican voting were initially told they were not qualified to participate, and only after persistent appeals were some allowed to vote. Some delegates never received notification of their qualified participant status despite pre-registering along with family members who did receive confirmation.

Furthermore, declarations confirm that bona fide voters already standing in the registration line at 6:00 pm when registration closed were supposed to be allowed to check in and vote, as advertised by the WCRP on its social media accounts. Instead, these voters were turned away, denying them their right to participate.

Robert Brown stated: *"I received an unsigned email from the Credentialing Committee that I was not a bona-fide Republican and could not participate in the convention. However, I have voted in every Williamson County Republican Primary since 1986. I appealed and they reversed their original decision blaming the state party for the error. I personally believe this was an attempt of voter intimidation, as I had spoken at the recent county party mix and mingle event on Election Integrity where the speaker promoted having elected administrators."*

Justin Wilson stated: *"I was told that I was a bona fide member. Showed up at 4:30 PM, to find out I was not on their list at the table. I was sent to a room to verify myself and was told in that verification process that I was not a bona fide member. After the fact, I was never given any chance to protest that. The next day I reached out to some contacts, even Brandon Bell and all said I showed as being able to vote."*

This claim is especially egregious because, essentially, it is leveling accusations at the State Party. They are the ones that generated the lists of those deemed qualified and those who appeared not to qualify. Once that list had been compiled, by the State Party, notification was sent out via the CCC. Errors in this process are not uncommon, and for that reason there are instructions for anyone who feels they have received the notification in error to make contact and provide any needed documentation. Mr. Brown's experience is, indeed, one such an error. However, he followed the emailed instructions and the error was corrected. Immediately. Again, not to sound like a broken record, but the Williamson County Conservatives' use of an alternate registration QR, created a great many of these problems. Many people thought they had registered for the event with the bogus code, only to then find out they had not. Likewise, there were people there from the Williamson County Conservatives group who were acting as Registration Officials checking lists that

they themselves had created and reportedly turning people away. When this was detected, they were immediately told to stop.

6. Campaigning and Electioneering in Voting Areas

Multiple delegate statements confirm that improper campaigning and electioneering took place within the voting areas. Delegates reported representatives of candidates in the voting area were urging delegates to vote for specific candidates. Campaign materials from the Elevate slate were distributed to voters entering the voting area and were found inside voting booths. Multiple declarations and statements confirm that four incumbent Williamson County Commissioners responsible for checking credential bracelets and handing out ballots---Mary Smith, Lisa Lenox, Christopher Richards, and Barb Sturgeon--had either issued official endorsements for the Contestees and/or had openly supported them in public and on social media prior to the Reorganization Convention. Indeed, some delegates observed individuals inside the voting room actively encouraging voters to "vote for the entire Elevate slate."

Sarah Critchlow stated: *"After a standing-room-only program, we stood in line to vote. A woman---who many assumed was working for the convention---walked down the aisle, person by person, instructing them to vote for Steve Hickey and his group. If someone expressed a different choice, she would roll her eyes or attempt to debate them. I stood near some elderly voters who had already decided to support Brian Clifford, yet she tried to confuse and sway them by questioning who was truly conservative."*

Brenda Johnson stated: *"As we approached the doors to the voting room and were about 6-8 feet before the voting door entrance, we saw numerous people wearing the Elevate badges who were passing out or shoving postcards with the slate of Elevate officers on it to people entering the voting room... There were numerous of these Elevate postcards with the slate of officers strewn around the actual voting areas where people had discarded them after they were given to them. The staffers did not throw them away."*

This claim is complicated because all the candidates campaigned, people were carrying items for both sides, both sides had stickers. Both sides, no doubt, saw a lot of the opposing slate's materials that people sat down in random places. However, in the case of the Commisioners, we argue that elected officials, who are currently sitting in elected positions, and are serving with honor, only add credibility to such an event. This is exactly the same logic used in including the RNC, the SEC, the State Party, the Election Commission, a Statesman of the Year, an election integrity specialist, and a past party chairman.

C. Conflicts of Interest

1. Biased Election Officials

All persons working the WCRP Reorganization Convention were supporters of the Contestees. These included but were not limited to incumbent Williamson County Commissioners responsible for checking credential bracelets and handing out ballots---Mary Smith, Lisa Lenox, Christopher Richards, and Barb Sturgeon. Multiple witnesses have confirmed these individuals were handling ballots and manning the voting stations, representing a clear conflict of interest. Several delegates specifically identify these commissioners as the individuals who handed them ballots, often in a disorganized manner and without proper instructions. These same individuals were observed advocating for the Contestees in the voting room and encouraging voters to vote for the entire slate of Contestees. These were not only biased election officials, they also presented a great deal of voter intimidation to anyone walking into the voting room that supported the Contestants.

Shauna Graham stated: *"With regard to the March 4th convention, Lisa Lenox was in the voting*

room and handed me a ballot. She was standing at a table with Mary Smith. They had a stack of ballots they were handing out in a manner that was not very orderly."

Robin Baldree stated: *"As I passed by County Commissioners Mary Smith and Lisa Lenox, I was waved over by County Commissioner Chris Richardson and an unidentified woman. They handed me a ballot without any instructions. When I asked where to go next, they simply pointed toward tables to my left."*

Elections Commission Chairman Duda observed:
"On more than one occasion I was approached by individuals that asked why County Commissioners who had publicly endorsed or promoted the Elevate 2024 slate of candidates were permitted to provision ballots, while County Commissioners who had supported the Williamson County Conservatives slate of candidates were not participating in the provisioning of ballots."

So many of these claims are pure projection and fantasy. The process didn't seem orderly enough to them—thus, they cry, "Voter suppression!" Some of the Commissioners didn't like the Williamson County Conservatives negative campaign—well, in their minds that must mean, "They are cheating!" Never mind that none of this so-called evidence supports the accusations. What fails to get mentioned is that these Commissioners were being watched by volunteers of the CCC, who were being watched by the campaign delegates, who were being watched by the Election Commission, etc. etc. Either this was a grand conspiracy involving people within their own campaign, along with everyone else who participated . . . or it simply didn't happen.

2. SEC Member Bias

Multiple declarations confirm that SEC Member Angie McClanahan distributed a three-page letter attacking the Williamson County Conservatives ticket at the Reorganization Convention. She later oversaw the recount of the Chairman's election despite having demonstrated clear bias against the Contestants. When her bias was pointed out during the recount, she attempted to disown the letter, but the recount proceeded under protest. Further declarations note the concerning involvement of SEC Member Cyndi Miller, wife of outgoing Chairman Tracy Miller. Cyndi Miller was actively involved in the credentialing process despite the obvious conflict of interest presented by her husband's record as Chairman being a major campaign issue. In 2023 Cyndi Miller also failed to recuse herself from Convention activities even though her husband was a candidate Chairman of the WCRP. Cyndi Miller along with SEC Member Steve Allbrooks were accused of interfering with the Contest and Credentials Committee during the 2023 Reorganization Convention. The entire Contest and Credentials Committee resigned before the Convention in protest to the activities of Cyndi Miller and Steve Allbrooks.

Alexandria Adair declared: *"I also noticed individuals handing out a letter at the entry of the building that appeared to be on Williamson County Republican Party letterhead. This was a letter typed up by SEC member, Angie McClanahan. This letter was in support of the Elevate 2025 team. There was a note at the top asking people to read and circulate. This was also posted on the website and shared to the Williamson County Republican Party Facebook page."*

Interesting that the Williamson County Conservatives harken to the previous Reorganization Convention in an attempt to insinuate that the sitting SEC is as equally corrupt as the sitting County Commissioners. The Williamson County Conservatives claim that WCRP should not have appointed a Contest and Credentialing Committee even though this is what is explicitly required in the Bylaws, yet at other times they claim any

minor infraction or waiver is entirely unacceptable. However, when the 2023 CCC resigned, it was also over a similarly bizarre insistence that State Bylaws be violated. They demanded the SEC give them the authority to grant waivers for delegates. They claimed that Cyndi Miller would ask for waivers in support of her husband. Again, never mind that there are safeguards that prevent such deception—any vote must be seconded by the other SEC member, and any tied votes go to Scott Golden to be decided. By breaking the Bylaws and ceding their SEC authority to the 2023 CCC those safeguards would have been stripped away, creating the aforementioned abuse of power. The Williamson County Conservatives would have it be believed that SEC member Cyndi Miller is apt to cheat, that SEC member Steve Albrooks, instead of blocking this violation, would join in. And they suggest that Chairman Golden is already compromised because, according to them, he is busy trying to alter the list of qualified participants in order to intimidate and disenfranchise people like Mr Brown.

3. Incumbent Advantage

Contestants all submitted their candidacies before the deadline to do so, but none of them ever received official notices that they had been accepted as qualified candidates. Brian Clifford raised concerns with State Chairman Scott Golden on February 18, 2025, about multiple issues, including the WCRP rejecting bona fide Republicans from registering, bias within the Contest and Credentials Committee, bias of an SEC member working on the event, and the fact that the incumbent Contestees had access to pre-registration lists while Contestants did not.

Further, declarations confirm that at the beginning of the Reorganization Convention, outgoing Chairman Miller spent considerable time campaigning for the opposition slate, touting the party's supposed successes under his leadership and attributing that success to the Contestees, an inappropriate advantage not afforded to the Contestants.

Brian Clifford declared: *"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."*

Kimberly Calcote declared: *"At no time did I ever receive an email from Debbie Deaver, any member of the Contest and Credentials Committee, or any member of the WCRP or TRP informing me that I had qualified as a candidate to run for Secretary of the WCRP. This was not a matter of their emails being marked as junk and/or spam by my email provider or the party's emails being otherwise undeliverable, as I received three emails from the Contest and Credentials Committee during the lead up to the WCRP Convention; however, none of those emails informed me that I was a qualified candidate."*

I was informed by the CCC that I would be given time to do a “State of the County Party” Speech, which I did. I only named my board members once in that speech, and it is true that I gave no similar thanks to any contributions from the Williamson County Conservatives. Most of them are not County Party Members, they never attend our meetings, they compare me to Joseph Stalin, they describe me as hating the elderly and the military, as someone who enjoys stealing votes, as being a traitor to the party, as being a

Democrat like Bill Clinton and Kamala Harris. They accused me of wanting to rig this election long before it even happened. Clearly, they created a polarized Reorganization. And then they want to question the credibility of anyone who might disagree?

4. Denial of Poll Watchers

Declarations confirm that poll watchers assigned to observe the check-in process were chased away from the registration tables by Debbie Deaver, Chair of the Contest and Credentials Committee, preventing independent oversight of the process. Multiple communications with Ms. Deaver documented in declarations show a pattern of bias against the Contestants, including refusing to allow candidates to appoint observers and putting people openly hostile to the Contestants in positions of authority in the election process.

Brian Floyd declared: *"A volunteer assigned as a Poll Watcher to observe the check in tables told me while Check In was occurring, he had been chased away from observing the check in process. I asked him who told him he could not be there. The volunteer positively identified Debbie Deaver as the person who prevented him from monitoring the Check In process."*

Brian Clifford declared: *"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 was never called to the polling station to watch the tabulation of the vote. 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."*

As mentioned previously, Chairwoman Deaver contacted both groups to have observers in the room. Both Chairman candidates were informed that they would be allowed to monitor the counting of the ballots. I did witness both candidates working the line within the convention room, shaking hands and asking for votes. I did witness their representatives going into the room for the count. I did witness representatives for the candidates go in for the recount. All things were fair and equal.

5. Voter Intimidation

Multiple delegate statements confirm instances of intimidation by the Contestee's supporters and officials. Some delegates observed WCRP officers and Contestees booing and heckling elected officials who supported the Contestants. Multiple delegates reported encountering misleading information from the Contestee's supporters and attempts to influence or change votes through intimidation. The hostile environment created for supporters of the Contestants was noted by multiple delegates.

The fact that open supporters and endorsers of the Contestees were posted in critical election positions presented clear and significant voter intimidation for anyone supporting the Contestants. Indeed, several County Commissioners (including Commissioners Mary Smith, Lisa Lenox, Christopher Richards, and Barb Sturgeon) openly endorsed and/or supported the Contestees but were placed in the prominent roles in the voting center. This alone presented significant voter intimidation to any delegate that supported the Contestants.

In reality, the entire process, procedures, and staffing of the Reorganization Convention was meant to intimidate any delegate supporting the Contestants; most notably as demonstrated by the fact that every worker designated by the current WCRP and its Contest and Credentials Committee was a biased supporter of the Contestees.

Robert Brown stated: *"When getting my ballot, Commissioner Barb Sturgeon an Elevate supporter recognized me, grabbed the ballot back from me and said my color arm band was wrong and I couldn't vote. She then laughed and said she was joking. I took this as an additional*

voter intimidation tactic. It was clearly unprofessional and uncalled for. She was trying to embarrass me in a room full of people about 50 or so and it was an attempt to mock me in front of all her Elevate buddies running the election."

Kilynn Schueler stated: *"Booing, heckling and hissing started when our elected officials stood to be recognized. This was not called into check. Why are Republicans booing their Republican elected officials?"*

These conflicts of interest and voter intimidation created an election environment that dissuaded delegates from supporting Contestants and gave every advantage to the Contestees, from controlling every aspect of the Reorganization Convention, to maintaining and providing every ballot to delegates from biased supporters, to overseeing the counting of votes. The overwhelming evidence from numerous declarations and statements shows a systematic effort to favor the Contestee's slate of candidates while disadvantaging the Contestants. Such partiality fundamentally undermines the legitimacy of the election results.

The fact that some volunteers decried the campaign tactics of the Williamson County Conservatives is not a reason to challenge their credibility, especially that of sitting Commissioners, SEC, or State Party Officials. If harsh statements were to create such an intimidating effect, what about the unending vicious attacks by the supporters of the William County Conservatives? As a witness, I can testify that Williamson County Conservatives, and their supporters, were there, wearing buttons, carrying fliers, shouting down speakers, and even issuing physical threats. In the end, it is apparent that despite some uncomfortable moments a record number of voters continued on and safely selected candidates of their choice for the County Party.

In closing, I want to say that I devoted two years of my life to the County Party. I worked hard to grow the membership and help all our candidates succeed. Thus, I find it appalling and reprehensible that this sad group can come in and attempt to scare people—not into silence—but into casting a vote in their favor. I can take their inane fliers and criticisms. I have zero respect for them now, so why would their words affect me?

However, they are hurting the party.

Sincerely,

Dr. Tracy Miller

Williamson County Republican Party 2023-2025