

No. 23-0127

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**In the Supreme Court of Texas,  
Austin, Texas**

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In Re:

The MoCo Precinct Chair Group, an unincorporated association, and  
Ronnie Trojanowski, Caleb Smith, Dale Inman, Betty Anderson, Kenneth Allen,  
Paul Crowson, Kristen Plaisance, Lauren Vickers, Bill Philibert, Doris (DJ) Fike,  
Steven Lawrence, Susan Carranza, Christina Lightfoot, James (Jim) Doyle,  
Wayne Pearson, Theresa Haag, John Wertz, Catherine Locetta, Gwen Withrow,  
Dennis Tibbs, Tom Lancaster, Steven Foster, Susan Scruggs, Blake Hall, Daniel  
Bingham, Melinda Olinde, Tanya Martinez, Mara Wasar, Patricia Carr, Robert  
Walker, Sherry Tavel, Mary Lewis, Kim Weber, Stephanie Cox, Stephanie  
Schwantes, Thomas Bartley, Diane Campbell, Jackie Williams, Luis Pedraza,  
Patrick Teich, Jon Bouche, Staci Earnest, Charles Shirley, Fred Sunderman, Kent  
Frappier, Nelson Reyes, Doug Taylor, Kenneth Earnest, Dale Fessenden, Juanita  
Simmons, Scott Robbins, Tammy Kelter, Josh Graff, John Schluter, Allison  
Winter, Donna McAleer, Herschel Williams, Kathy Ross, Ginger Russell, Larry  
Rogers, Suzanne Rapattoni and Neda Henery.

Relators.

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**Original Proceeding  
Art. V, Section 3 of the Texas Constitution**

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**Petition for Writ of Mandamus**

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## **IDENTITY OF PARTIES AND COUNSEL**

### **A. Relators**

MoCo Precinct Chair Group, an unincorporated association, includes:

Kenneth Allen (Pct 34, elected)	Bill Philibert (Pct 42, 1/3/23)
Betty Anderson (Pct 31, elected)	Kristen Plaisance (Pct 37, elected)
Thomas Bartley (Pct 103, 7/23/22)	Suzanne Rapattoni (Pct 99, elected)
Daniel Bingham (Pct 85, elected)	Nelson Reyes (Pct 4, elected)
Patricia Carr (Pct 83, elected)	Scott Robbins (Pct 33, elected)
Susan Carranza (Pct 49, elected)	Larry Rogers (Pct 75, elected)
Stephanie Cox (Pct 98, 7/23/22)	Kathy Ross (Pct 67, elected)
Paul Crowson (Pct 36, elected)	Ginger Russell (Pct 74, elected)
James (Jim) Doyle (Pct 56, 10/4/22)	John Schluter (Pct 44, elected)
Kenneth Earnest (Pct 6, elected)	Stephanie Schwantes (Pct 101, 8/13/22)
Dale Fessenden (Pct 17, elected)	Susan Scruggs (Pct 81, elected)
Doris "DJ" Fike (Pct 102, elected)	Juanita Simmons (Pct 19, elected)
Steven Foster (Pct 80, 8/13/22)	Caleb Smith (Pct 26, 8/13/22)
Kent Frappier (Pct 2, elected)	Sherry Tavel (Pct 95, 8/13/22)
Josh Graff (Pct 40, elected)	Doug Taylor (Pct 5, elected)
Theresa Haag (Pct 68, elected)	Patrick Teich (Pct 111, 8/13/22)
Blake Hall (Pct 82, 1/3/23)	Dennis Tibbs (Pct 76, elected)
Neda Henery (Pct 108, elected)	Ronnie Trojanowski (Pct 73, elected)
Dale Inman (Pct 27, elected)	Lauren Vickers (Pct 39, 1/3/23)
Tammy Kelter (Pct 35, elected)	Robert Walker (Pct 87, elected)
Tom Lancaster (Pct 79, elected)	Mara Wasar (Pct 92, 7/23/22)
Steven Lawrence (Pct 48, elected)	Kim Weber (Pct 97, elected)
Mary Lewis (Pct 94 7/23/22)	John Wertz (Pct 69, elected)
Christina Lightfoot (Pct 50, elected)	Herschel Williams (Pct 63, elected)
Catherine Locetta (Pct 71, elected)	Jackie Williams (Pct 107, 8/13/22)
Tanya Martinez (Pct 90, 1/3/23)	Allison Winter (Pct 59, elected)
Donna McAleer (Pct 61, elected)	Gwen Withrow (Pct 72, 7/23/22)
Melinda Olinde (Pct 89, elected)	Jon Bouche (Vice Chair, 7/23/22)
Wayne Pearson (Pct 52, elected)	Staci Earnest (Secretary, 7/23/22)
Luis Pedraza (Pct 110, elected)	Charles Shirley (Treasurer, 7/23/22)

Counsel for Relators: Warren V. Norred, 24045094; C. Chad Lampe, 24045042  
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**B. Real Parties in Interest:**

Montgomery County Republican Party Executive Committee, and	
Kenneth Ditto (Pct 103)	Destiny Stark (Pct 92)
Brenda Dunkley (Pct 101)	Cynthia Stinnett (Pct 94)
Brian Hagan (90)	John Thomas (Pct 26)
Martha Ann Kate (Pct 72)	Richard VonRoble (Pct 80)
Keith Lincoln (Pct 56)	Jeffrey Walding (39)
Jamie Nash (42)	Stephen Wright (Pct 62)
Stanley Oatis (111)	Clarence Lewis (Pct 10)
Jodi Runovar (82)	Raquel Lewis (Vice Chair)
James Smith (95)	Mike Medved (Treasurer)
James Spurgin (104)	Mark Frank (Secretary)

The Real Parties in Interest comprise:

- 1) the Montgomery County Republican Party Executive Committee, as a body;
- 2) the individuals named above who Christ has asserted are precinct chairs and has submitted or is expected to submit to the Texas Secretary of State (the asserted specific precinct is indicated parenthetically); and
- 3) the three individuals who Bryan Christ has purported to have elected as executive officers until he can obtain a quorum and elect them.

**C. Respondent:**

Bryan Christ, Chair of the Montgomery County Republican Party

Counsel for Respondent:

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## **ON THE NECESSITY OF AN ORAL HEARING**

Relators do not see the necessity of an oral hearing in this case, but will appear and defend this application in oral argument if Respondent requests such or this honorable Court would hear argument on the matter.

## **APPENDIX, APPLICABLE ABBREVIATIONS, and EVIDENCE**

Relators have filed with this petition an appendix of exhibits, comprising declarations of relators and supporting documents.

Relators will refer to specific sections of Robert's Rules of Order, Newly Revised, 12th Edition, using "RONR X:Y" to indicate section X and paragraph Y.

Relators will also refer to the rules of the Republican Party of Texas by the nomenclature "RPT Xa" for Rule X, section a of the Rules.

The Texas Election Code may be referenced as "TEC" for conciseness.

Relators have provided considerable evidence in the form of case law, party rules, county executive rules, and excerpts of Robert's Rules of Order. Additionally, each Relator has written a declaration compiled in the appendix.

## STATEMENT OF THE CASE

**Underlying Proceeding:** This dispute stems from Bryan Christ's failure to faithfully and ministerially provide a list of precinct chairs to the Texas Secretary of State.

***Nature of Case and Ruling at Issue:*** Section 171.024(e) of the Texas Election Code requires chairs of county parties to submit a list of newly appointed precinct chairs from their respective counties to the Texas Secretary of State, a ministerial act enforceable by mandamus in the courts of appeal, including the Supreme Court of Texas, under sections 161.007, 161.009, and 273.081 of the Texas Election Code.

Following a rift in the Montgomery County Republican Party Executive Committee, Chair Bryan Christ has abandoned his duty to preside over properly called meetings and ignored the precinct chair appointments made during meetings he has abandoned. Instead, he has called other meetings with his minority supporters and made competing precinct chairs improperly, and then reported those individuals as filling chair positions to the Secretary of State.

Bryan Christ's inaccurate reports to the Texas Secretary of State violate Texas law, and are the rulings at issue.

The resulting bifurcation of the county party has extended beyond internal strife and threatens the county's operations, preventing the executive committee from functioning properly. Christ is misrepresenting the county's precinct chairs to candidates and vendors who rely on these lists and will cause chaos in upcoming elections and conventions.

***Relief Sought*** Relators ask the Court to issue mandamus requiring Bryan Christ to report the properly nominated precinct chairs to the Secretary of State as described herein.

## **INTRODUCTION TO PETITION FOR WRIT OF MANDAMUS**

TO THE HONORABLE SUPREME COURT OF TEXAS:

Relators file this petition for writ of mandamus to require Bryan Christ, the elected chair of the Montgomery County Republican Party, to report the proper list of precinct chairs to the Texas Secretary of State, a ministerial act over which he has no discretion. Mr. Christ has submitted the names of precinct chairs to the Secretary of State who have not been properly appointed, while leaving others who have been properly appointed off of his submissions.

Additionally, Christ has interfered in the duties of the elected officers of the county executive meeting, particularly the treasurer, as he filed statutorily required financial reports with the Texas Ethics Commission.

Lastly, Christ is now attempting to eliminate his critics by misusing the Texas Election Code to punish those who do not attend special meetings called by his officers who gained their position by using improperly appointed precinct chairs.

Relators ask this Court to evaluate indisputable facts and come to the conclusion that Bryan Christ has and is failing his ministerial duties with regard to precinct chair name submission. While there are many facts that must be evaluated to adjudicate this matter, no genuine fact issue exists and mandamus is appropriate and will resolve the remainder of the issue. This cannot go on.

## FACTS

### **Prelude - the Executive Committee operated as one body until July 25th.**

#### **A. Chairman Bryan Christ starts abusing rules for his preferred faction.**

Martha Ann Kate was reelected to serve as chair for precinct 72 in May of 2022. On June 7, Kate resigned by email sent to Bryan Christ, Sec. Raquel Lewis, and Vacancy Chair Allison Winter. Christ responded as shown below:<sup>1</sup>

From: Bryan Christ <bryan4mcrp@gmail.com>  
Date: Tue, Jun 7, 2022 at 12:04 PM  
Subject: Re: Precinct chair resignation  
To: Ann Kate <annkate43@gmail.com>  
Cc: Raquel Lewis <raquel-lewis@outlook.com>, Aywinter@gmail.com <aywinter@gmail.com>, Gwen Withrow <greck@gt.rr.com>  
Ann,  
I'm sorry to hear that. As a matter of technicality I can accept your resignation only for the current biennium. As far as the SOS is concerned and the Texas Election Code goes, you will be seated as a Pct Chair on June 13th. Related to this, there are two governing clauses in the TEC which preclude a Pct Chair vacancy from being filled until after we have codified our Bylaws for the new biennium at the Organizational Meeting. Feel free to give me a call if you have any questions.  
Bryan

On Tue, Jun 7, 2022 at 11:06 AM Ann Kate <annkate43@gmail.com> wrote:  
Please accept my resignation as Precinct 72 chairman. After 8 years as chairman I feel it is time for me to let someone else be in charge of my wonderful, heavily Republican, precinct. I hope to become involved in something other than politics, but will continue to support the Republican Party in other ways.

I would like to recommend Gwen Withrow to replace me as chairman of precinct 72. Gwen and her husband recently moved to Bentwater, in Precinct 72, but she has been active in Republican politics for many years and in many capacities. She is currently the SD4 SREC representative.

Good luck to the CEC in the coming two years. I hope some real work will get done for the Party.

Ann Kate  
Pct. 72 Chairman

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<sup>1</sup> Exhibit 64, Declaration of Gwen Withrow, which includes these and other supporting emails indicating that Kate intended an immediate resignation of her current and future terms.

As detailed below, Kate changed her mind as this dispute unfolded. However, the Precinct Chair Group recognized the resignation as binding, and later filled the vacancy by appointing Gwen Withrow as Precinct 72 chair.<sup>2</sup>

**B. The CEC's July 19th Organizational Meeting accomplished nothing.**

Christ called the Organization Meeting of the Montgomery County Republican Party Executive Committee ("CEC") on July 19, 2022.<sup>3,4</sup> This first meeting's agenda included approval of the agenda,<sup>5</sup> adoption of bylaws and adjournment at the completion of the agenda. The adoption of bylaws for the current biennium is required by the Republican Party of Texas ("RPT").<sup>6</sup>

After a quorum was established, the July 19<sup>th</sup> meeting became mired for hours over a motion to substitute the original agenda for an amended agenda.<sup>7</sup> After that motion passed, member James Byers claimed that, because the top of the amended

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<sup>2</sup> *Id.*

<sup>3</sup> All dates are in 2022 unless otherwise stated.

<sup>4</sup> All video links in this pleading are authenticated by Exhibit 70, the Declaration of Billy Graff. The July 19, 2022 meeting is online at <https://www.youtube.com/watch?v=zBMEzhblycA>. Pinpoint cites are to this video. All URLs in this petition were last accessed on February 13, 2023.

<sup>5</sup> On July 12th, Bryan Christ sent an official meeting call with an agenda and his proposed bylaws for the meeting to be held on July 19. Exhibit 5-1. Later that day, Relator John Wertz sent another set of proposed bylaws (the "Freedom Caucus Bylaws") to Christ for his dissemination and consideration at the coming meeting. Exhibit 5-2. Christ never posted or sent the proposed Freedom Caucus Bylaws to the CEC's website, even after Wertz sent a second email to Christ on July 15, demanding that he follow RPT 8(e) which requires a chair to post "any proposed bylaws" on the CEC website and send them to members. Exhibit 5-3 & 5-4.

<sup>6</sup> Exhibit 5-5

<sup>7</sup> Exhibit 5-6.

agenda had the title “Freedom Caucus” on it, he did not know what meeting he was attending.<sup>8</sup> The ensuing chaos fractured the room further.

After more than three hours had passed without substantive progress, Fred Sunderman moved to adjourn to allow the two sides, which could be roughly described as the “Christ Group” and the “Precinct Chair Group” to discuss the issues and resolve the differences, which he intended to be a motion to adjourn “to a convenient time” under RONR 9:17.<sup>9</sup>

A voice vote followed the Sunderman motion to adjourn. The video of the meeting shows that there was no obvious winning side in the voice vote. Christ ignored at least three calls for a division of the house when he announced that the meeting was adjourned, rather than following RONR to ensure that all business was complete under the agenda (RONR 21:3).<sup>10</sup> Christ recognized no call for a division.

Additionally, item No. 11 of the adopted agenda<sup>11</sup> stated that the meeting was to “adjourn at the completion of the agenda”, which was not achieved by Christ’s premature adjournment, and no attempt occurred to establish whether the motion to

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<sup>8</sup> <https://www.youtube.com/watch?v=zBMEzhblycA> at 1:34:36.

<sup>9</sup> See Exhibit 50, <https://www.youtube.com/watch?v=zBMEzhblycA> at 3:17:34.

<sup>10</sup> <https://www.youtube.com/watch?v=zBMEzhblycA> from 3:17:52 to 3:18:15; RONR 62:6-12.

<sup>11</sup> See substitute agenda, Exhibit 5-4.

adjourn had been with a two-thirds majority in order to modify the agenda in accordance with RONR.

At the end of the Organizational Meeting, no bylaws had been adopted, no CEC members had been sworn in, and no rules for filling CEC vacancies had been adopted, in violation of TEC 171.024(a), RPT 8e, and 8i.<sup>12</sup>

**C. Christ failed to preside over a validly called meeting on July 23<sup>rd</sup>.**

To complete the work of the adjourned organization meeting, 39 precinct chairs and Gwen Withrow, a member of the State Republican Executive Committee (“SREC”) representing part of Montgomery County, signed a petition for a second meeting and sent it to Bryan Christ on July 21<sup>st</sup> (the “Walker Call”). The Walker Call was emailed on July 21 at 8:55 a.m. and set the emergency meeting to be held July 23.<sup>13</sup>

CEC member James Byers emailed a second petition call signed by 21 members to Christ at 4:36 p.m. that day (the “Byers Call”).<sup>14</sup>

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<sup>12</sup> Either the meeting was adjourned and over, as Christ has held, or it was adjourned to a time convenient, as Sunderman and the majority intended. For purposes of this pleading, Relators argue that the issue is irrelevant to the claims made and remedies sought, and accept arguendo that, by operation of RPT 8e, the CEC adopted its previous biennium 2020-2022 Bylaws (“Old Bylaws”) when the Organizational Meeting failed to adopt bylaws before adjourning by operation of RPT rules.

<sup>13</sup>Exhibit 5-7 & 5-8.

<sup>14</sup>Exhibit 5-9 & 5-10.



The significant difference between the two calls, beside the fact that the Walker Call was supported by nearly twice the number of signatories as the Byers Call, was the *improper* inclusion of a virtual participation option in the Byers Call.<sup>15</sup>

Shortly after the Byers Call was sent, Christ sent a personal email to precinct chairs. In this email, Christ admitted that he accepted that both the Walker Call and the Byer's Call were both valid calls, and both satisfied the requirements necessary to make a legitimate call. He also took the position that the Organizational Meeting on July 19th had been properly and finally adjourned.<sup>16</sup>

At the July 23 meeting, around 9:00 a.m., Christ reiterated to those assembled that he had two valid calls for the meeting.<sup>17</sup> To resolve the conflicting agenda in the calls, Christ announced that he would conduct a vote *before* calling the meeting to decide whether to use the agenda in the Walker Call or the Byers Call. Christ stated that this was “not Robert's Rules of Order” and asserted that the conflicting called meetings somehow warranted this approach.

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<sup>15</sup> RONR 9:36 describes the requirements for a proper electronic meeting call, and states that the call must “include an adequate description of how to participate in it, e.g., the telephone number to call for a teleconference. The Byers Call had no details regarding any Zoom link or hint of the details of how to participate.

<sup>16</sup> Exhibit 5-11.

<sup>17</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 2:35.

The room erupted in objection and chaos. Christ continued to insist on an unofficial, out of order vote, so Walker told the chairman that the meeting should be called to order, and if he would not chair the meeting he should leave.<sup>18</sup>

Christ eventually gave up his attempt to convince the body that it could take a binding vote before coming to order. **Christ never called any meeting to order.**<sup>19</sup>

At about 9:15 a.m. and fifteen minutes after the meeting should have come to order, Robert Walker called the meeting to order pursuant to RONR 62:9-12.<sup>20</sup> Several members appealed the decision of Chair Christ, attempting to get him to preside over the meeting. After significant discussion, Walker declared that three appeals had been made and seconded to the chair, and that Christ's authority as presiding chair had been revoked in accordance with Robert's Rules.<sup>21</sup>

Walker asked for the roll call of the members; 55 elected precinct chairs responded as present.<sup>22</sup> A later roll call still showed 51 members present.<sup>23</sup> With a membership of less than 100, the body had more than 50% present. The Old Bylaws

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<sup>18</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 6:42 in the video

<sup>19</sup> Exhibit 63, Declaration of Allison Winter.

<sup>20</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 11:55.

<sup>21</sup> Exh. 4, RONR 62:12; Exhibit 5-39, Meeting Minutes.

<sup>22</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 28:44; Staci Earnest called the roll.

<sup>23</sup> See Exhibit 5-12, which indicates two roll calls, the first with 55 present, the second with 51.

require a quorum of 25% to conduct non-statutory business, 33% to appoint precinct chairs, and 40% to elect officers.<sup>24</sup>

The body then elected Dale Inman as its temporary chair, and he proceeded with the agenda.<sup>25</sup> SREC member Gwen Withrow swore in the CEC members, a leftover requirement missed during the prematurely-adjourned Organizational Meeting.<sup>26</sup> The body approved new bylaws (“New Bylaws”) by a roll call vote of 37 in favor.<sup>27</sup> The body then elected officers, including Jon Bouche for Vice-Chairman, Staci Earnest for Secretary, Charles Shirley for Treasurer, and five other steering committee members, and then appointed six precinct chairs, Gwen Withrow (72), Mara Waser (92), Thomas Bartley (103), Mary Lewis (94), Stephanie Cox (98), and Diane Campbell (104), leaving seven precincts without chairs.<sup>28</sup>

Bryan Christ has asserted that quorum had dropped below 40% and thus could not have legitimately elected officers. However, the record does not reflect that fewer than 40% of the members remained. Christ appears to be asserting that the 37 votes in favor of the bylaw’s adoption establishes that only 37 members were

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<sup>24</sup> Exh. 3.

<sup>25</sup> Bryan Christ interrupted the meeting to announce he was leaving after the election of Inman to preside and left as the members were sworn in.

<sup>26</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:08:31.

<sup>27</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:29:26. This result would have successfully passed even if a 2/3rds majority was required.

<sup>28</sup> Christ disputes that Precinct 72 was vacant, asserting that Kate’s resignation was invalid. This is discussed below.

present, but no evidence supports that position. The video record shows that Christ and only a handful of other chairs left the meeting. Neither the video nor meeting minutes indicate that those present had decreased from 55 to below 40 (which would still meet a 40% quorum), nor do they show that any member asked the chair to ensure quorum was met; quorum is therefore presumed under RONR.<sup>29</sup>

Bryan Christ has also asserted that the vote in favor of all precinct chairs at this meeting is invalid, citing the Vacancy Committee rule which states, “Each vacancy is voted separately.” However, the natural reading of this rule means that the votes to recommend from the Vacancy Committee is by individual vote. There exists no evidence to suggest that the CEC must vote to fill vacancies individually.<sup>30</sup>

The parties have disputed whether this July 23rd meeting was a legitimate continuation of the July 19<sup>th</sup> Organizational Meeting. Member Fred Sunderman’s motion to adjourn the July 19<sup>th</sup> meeting was couched with language indicating that the adjournment was for the purpose of the two factions discussing their differences and returning together and was thus a motion to adjourn to a time convenient.<sup>31</sup>

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<sup>29</sup> See Exhibit 4, RONR 40:12. The Christ Group asserts that there were 98 members of the CEC at that time, rejecting Kate’s resignation, while the Precinct Group asserts that there were 97 members at that time. In either case, 40 members present exceeds the minimum of 40%. Additionally, three members (Allison Winter, Cathie Locetta and Donna McAleer), were not back from a break when the bylaws vote was taken, indicating that 40 members were present after the Christ Group contingent left the meeting. Exhibit 63, Declaration of Allison Winter.

<sup>30</sup> See Old Bylaws, Exhibit 3, Art. VII, Section (2) (vacancy committee votes separately).

<sup>31</sup> Exhibit 4, RONR 9:17; Exhibit 50, Declaration of Frederick Sunderman.

Christ adjourned the meeting so quickly that the details could not be worked out. However, this distinction is irrelevant, as the Walker Call stated the meeting was to: “Reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment.” Christ had already stated this was a properly called meeting and therefore approved and confirmed the stated purpose of the meeting. The Walker called meeting was proper and a quorum was established to accomplish all that occurred.

**D. The Bryan Christ Meeting by Zoom on July 25 is four hours of inaction.**

Becky Vance sent out her meeting call on July 20, 2022, to be held on July 25, 2022, to complete the unfinished business that must be completed by the Old Bylaws. The meeting call was signed by 25 precinct chairs.<sup>32</sup>

Since the body of chairs present at the Organizational Meeting did not follow the agenda that Christ had presented, he saw the July 25, 2022 meeting as the true and correct continuation of it.<sup>33</sup> He explicitly chose not to recognize the July 23, 2022 meeting as a legitimate meeting in any capacity.<sup>34</sup>

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<sup>32</sup> Exhibit 5-13 & 5-14.

<sup>33</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:02:30, 1:06:36, & 1:07:15.

<sup>34</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:02:56.

During the July 25, 2022 meeting, chair Allison Winter raised a point of order, challenging the precinct chairs that then Secretary Raquel Lewis had called during roll call.<sup>35</sup> Mrs. Winter pointed out that several of the vacancies were filled, and that Ann Kate had been replaced by Gwen Withrow as part of the agenda completed by the Precinct Chair Group during the July 23, 2022 meeting.<sup>36</sup>

Christ clarified that he did not recognize Ms. Kate's resignation, asserting that the resignation was sent in the previous biennium, and she had sent an application for her current chair position inside the current biennium period, so she was still presiding as Precinct 72's chair.<sup>37</sup> Christ's assertion was contrary to Ann Kate's own emails to Gwen Withrow and all previous written communications.

Christ then allowed Ms. Kate to speak, and she confirmed that she accepted Christ's explanation regarding her resignation, and accepted Christ's ruling that her June 7th email could not include a resignation for the coming biennium. She further stated that she had changed her mind, and that if she chose to resign, she would send a second resignation letter during the current biennium period.<sup>38</sup>

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<sup>35</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:03:26.

<sup>36</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:04:04.

<sup>37</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:04:11.

<sup>38</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:05:03.

Two chair members then appealed, again saying that the meeting on July 23 was a legitimate meeting, and that the agenda presented on July 25 had already been completed.<sup>39</sup> Christ again repeated that he did not recognize the July 23 meeting as legitimate, and that this appeal was out of order. He stated that he would regard all points of order for the remainder of the meeting regarding the legitimacy of the July 23 meeting as dilatory.<sup>40</sup>

At about three hours in, there was a motion to adjourn, and Christ's refusal to count the newly added precinct chairs impacted the proceeding by causing the motion to adjourn, which would have passed otherwise, to fail.

The meeting then continued with several votes and various chairs bringing points of inquiry, and after about 4.5 hours, the minutes of the meeting have no indication that any substantive action occurred before the meeting adjourned.<sup>41</sup>

**After July 25, the CEC divided, each faction purportedly holding meetings and appointing chairs.**

**A. The CEC has competing calls for August 13 Meetings in separate locations.**

On July 30, the two factions of the CEC sent out competing calls for meetings on August 13. CEC Member Tibbs called for a meeting with a petition listing 27

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<sup>39</sup> Kenneth Earnest at 1:02:30, Herschel Williams at 1:06:36, Kenneth Earnest, again at 1:07:15.

<sup>40</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:07:21.

<sup>41</sup> <https://www.youtube.com/watch?v=WPA9jjpn3Zo> at 4:30:42.

names in support (“Tibbs Call”).<sup>42</sup> A short time later, Christ sent out a call from Byers (“Byers Call”) with an insufficient 19 signatories for a meeting to be held at the same time but different location than the one identified in the Tibbs Call.<sup>43</sup>

**B. On August 11, Christ uploaded a disputed list of elected precinct chairs.**

Bryan Christ uploaded a list of 16 duly elected precinct chairs to the Secretary of States, 48 days past the deadline to submit those names. Christ’s list did not include the six precinct chairs appointed on July 23rd, and did include Martha Ann Kate for precinct 72, though she had submitted a written resignation.<sup>44</sup>

**C. The Precinct Chair Group held a successful CEC meeting on August 13.<sup>45</sup>**

The call by Tibbs resulted in a meeting of 45 members.<sup>46</sup> The body appointed individuals to eight vacant precinct chairs,<sup>47</sup> including Caleb Smith (26), Bobbi Bodenhamer (54), Jennifer Bowling (62), Steven Foster (80), Sherry Tavel (95), Stephanie Schwantes (101), Jackie Williams (107), and Patrick Teich (111).

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<sup>42</sup> Exhibit 5-15.

<sup>43</sup> Exhibit 5-16. Under the Old Bylaws, emergency meetings require 20% of the membership. With 27, the Tibbs Call was sufficient. After the vacancies were filled on July 23, the total number of filled precinct chairs was 104. Irrespective of whether the number of non-vacancies was 97, 98, or 104, the minimum needed to call a meeting would have been  $97 \times .2 = 19.4$ . For 19 members to be able to call a meeting based on a 20% membership, the membership would have to be *no more than*  $19 \times 5 = 95$ . The Byers Call indisputably failed to meet the minimum, and it could not act.

<sup>44</sup> Exhibit 5-28 & Exhibit 5-38.

<sup>45</sup> Hereafter, this pleading will refer to the “Precinct Chair Group” and the “Christ Group”.

<sup>46</sup> Exhibit 5-18 & 5-19.

<sup>47</sup> *Id.*, Trish Fahrenthold of Precinct 95 resigned, creating another vacancy.



After electing and swearing in these eight, the Precinct Chair Group also passed a resolution to change bank contacts and set up a standing meeting schedule.<sup>48</sup>

**D. On August 13, the Christ Group held a meeting without a valid call.**

Though the Byers Call for August 13 was an invalid call due to lack of sufficient signatories, Christ held a meeting as though the call was valid. Minutes of the meeting show that the 30 precinct chairs who attended did not have a quorum to elect officers or fill precinct chair vacancies, and continued to ignore the legitimacy of the July 23rd meeting and the appointments made at that meeting.<sup>49</sup>

Before electing steering committee members, Christ commented that the CEC was operating under the Old Bylaws, ignoring the fact that the CEC had already adopted the New Bylaws during the July 23rd meeting. Christ and those present then purportedly elected members for the steering and other committees, proceeding as though the July 23rd meeting had not already filled those positions.<sup>50</sup>

Relators take the position that the meeting arising out of the Byers call was invalid, and that any actions taken at said meeting were also invalid.<sup>51</sup>

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<sup>48</sup> Exhibit 5-19.

<sup>49</sup> Exhibit 5-17, Minutes from the Christ Group's August 13, 2022 meeting.

<sup>50</sup> *Id.*

<sup>51</sup> Exhibit 4, RONR 1:6; 25:9.

### **E. The Precinct Chair Group held a successful September 6th meeting.**

Secretary Staci Earnest (Precinct Chair Group) issued a call on August 23 for a meeting to be held on September 6, in accordance with the resolution establishing meeting schedules at the August 13 meeting (Old Bylaws Art. 5, sec. 4; Art 6, sec. 2). RONR 9:2. With an attendance of 49 members, the meeting was well above the 40% quorum threshold for electing officers or committee members, and filling vacancies.<sup>52</sup>

In an effort to meet the Christ Group halfway, the Precinct Group adopted the Old Bylaws. It then reconfirmed the appointments for precinct chairs appointed on July 23, 2022, and August 13, 2022 with individual votes for each appointee, meeting the 33% minimum quorum required to fill vacancies, and doing so without including chairs that Christ had refused to acknowledge previously.<sup>53</sup>

The body then passed a resolution requiring calls for meetings based on an emergency to define the emergency in accordance with section 551.045 of the Texas Government Code, “actions that require the immediate action of the CEC and cannot be resolved at the next scheduled meeting” and a second resolution adopting rules regarding electronic meetings.

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<sup>52</sup> Exhibit 5-23.

<sup>53</sup> Exhibit 5-24. The meeting’s minutes show a unanimous voice vote of 49 chairs, at least 38 of which are recognized by the Christ Group.

The CEC also affirmed Ann Kate's resignation on June 7, 2022, affirmed Gwen Withrow's position as chair, and instructed the Chair to notify the Texas Secretary of State of the new chairs immediately, including: Sherry Tavel (95), Jennifer Bowling (62) Jackie Williams (107), Patrick Teich (111), Diane Campbell (104), Stephanie Cox, (98), Mary Lewis (94) Thomas Bartley (103), Caleb Smith (26), Gwen Withrow (72), Stephen Foster (80), Mara Waser (92), Bobby Bodenhamer (54), and Stephanie Schwantes (101).<sup>54</sup>

The body then passed three resolutions, all unanimously. The first resolved that the August 13, 2022 meeting petitioned by Byers was "Out of Order and Invalid" because the 20% threshold for a meeting call had not been met. The second resolved that the Christ Group of executive officers were relieved of duty, and its committees dissolved. The third resolution sought to compel chairman Christ to fulfill his duties as county chair of the CEC.<sup>55</sup>

#### **F. The Christ Group fails a third time to reach quorum on September 6<sup>th</sup>.**

James Byers sent a petition for a meeting that listed 25 precinct chair members in support, including Ann Kate, who had resigned.<sup>56</sup> With only 30 members present, the Christ Group failed to reach the 40% quorum required to elect officers or 33%

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<sup>54</sup> Exhibit 5-24.

<sup>55</sup> Exhibit 5-25, 5-26, 5-27.

<sup>56</sup> Exhibit 5-21.

to appoint precinct chairs. To resolve the issue, the Christ Group voted to allow appointed officers to serve as temporary officers until the group is able to meet quorum, ignoring the July 23rd election of officers which filled these positions.<sup>57</sup>

Additionally, the Christ Group voted to authorize electronic mail voting to fill precinct chair vacancies per RPT Rule 7(c), and to reduce the quorum required to fill vacancies to 30%. Nothing in the record shows that anyone present recognized that these were limitations set by the Old Bylaws and required an amendment process to change rather than a simple majority.<sup>58</sup>

The Christ Group was unable to fill vacancies and officer roles in various committees. This is the first serious bifurcation of the meetings, where the Christ Group decided to plow forward on its own, irrespective of the Precinct Chair Group's sizeable majority and previous decisions, all of which were valid.

**G. The Christ Group uses Zoom in a non-emergency to create a quorum and appoint precinct chairs in its December 5th meeting.**

Using the improperly seated chairs and an improper Zoom meeting on December 5, Christ claimed that the meeting had reached the 40% quorum threshold to elect executive officers and appoint chairs. (The minutes do not reflect who was

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<sup>57</sup> Exhibit 5-22.

<sup>58</sup>Exhibit 3, Old Bylaws, Art. III, Sec. 4A sets the quorum at 33% for filling vacancies; Art. XVI governs online meetings and includes a provision for online meetings; Art. XIV governs bylaw amendments, which require a 21-day notice and a committee evaluation process.

physically present and who was attending online.) The Christ Group reported in its minutes that it appointed Jamie Nash (42), Jodi Runovar (82), Brian Hagan (90), and Jeffrey Walding (39) to the list of precinct chairs, doing so without proper notice.<sup>59</sup>

Relators also assert that this meeting was out of order because the majority Precinct Chair Group had previously passed resolutions requiring that all special meetings comply with the Old Bylaws and that online attendance must be justified by a statement of emergency specifying the reason for the emergency. The Christ Group's meeting did not comport with these rules, and without such compliance, was invalid in all respects.<sup>60</sup>

### **On December 6th, the unity meeting fails, and open warfare results.**

#### **A. The Precinct Chair Group attempted reconciliation.<sup>61</sup>**

On December 6, the Precinct Chair Group held a special CEC meeting, in person, called by Robert Walker, with 26 chairs in total supporting the call. Walker called the meeting as a "Unity Meeting" to "[...] resolve the issues dealing with appointed Precinct Chairs and elected officers [...]"<sup>62</sup>

The meeting was called to order by Bryan Christ, who asked the Christ

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<sup>59</sup> Exhibit 63, Declaration of Allison Winter.

<sup>60</sup> Exhibit 5-22.

<sup>61</sup> December 6, 2022 meeting recording <https://www.youtube.com/watch?v=zcwjJB0f9VE>.

<sup>62</sup> Exhibit 5-30.

Group's secretary Mark Frank to conduct the roll call, despite the meeting being called by the Precinct Chair Group. The Precinct Chair Group then made several objections to this decision, as it was clear to them that Christ was attempting to have the Christ Group officials conduct the business of the meeting and not the elected members of the Precinct Chair Group.<sup>63</sup>

After much discussion and many objections, the Precinct Chair Group eventually succeeded in having their elected secretary Staci Earnest lead the roll call.

After Earnest completed the roll call and found a quorum of 57 members were present, Christ continued to debate the legitimacy of the Precinct Chair Group's secretary and insisted that the Christ Group's secretary Mark Frank was the only duly elected Secretary. Several members of the Precinct Chair Group made points of order challenging this ruling.<sup>64</sup>

Christ then stated that the meeting was to be "at ease". Several precinct chairs objected to this call and appealed the chair. After Christ refused to put the appeals to a vote, John Wertz cited Robert's Rules of Order 62:9, and appealed to the body for a vote. His vote was upheld unanimously. Because of this, the comments Christ made regarding his Secretary Mark Frank being the sole legitimate secretary, as well

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<sup>63</sup> Exhibit 5-31.

<sup>64</sup> Walker, Lawrence, Robbins, & Wertz; Exhibit 5-31.

as his attempt to put the meeting “at ease” during the middle of active discussion were overruled.<sup>65</sup>

Following the appeal vote led by Wertz, Christ stated for a second time that he was making the meeting “at ease”. This was again objected to by multiple members.<sup>66</sup> Christ continued to insist that his call of the meeting to be “at ease” stood, and that the meeting would not continue forward. Wertz, Walker and others objected to this position, arguing that a meeting could not be brought to ease when members object. Scott Robbins, in particular, referenced Robert’s Rules of Order 8:2.4 which states: “A meeting is said to stand at ease if the chair, **without objection**, simply permits a brief pause without declaration of a recess.”

After Christ again refused to proceed, Wertz moved for a declaration under RONR 62:11 that the chair was vacant because Christ was refusing to perform his duties as chair and the body should elect another presiding officer. The motion passed unanimously, and Christ was removed as presiding officer of the meeting.<sup>67</sup>

The body then passed a Resolution to Censure Chairman Christ for his dereliction of duties, including his failure to submit precinct chair appointee names to the Secretary of State, a violation of the TEC, and supplying the Secretary of State

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<sup>65</sup> Exhibit 5-31; Exhibit 63, Declaration of Allison Winter.

<sup>66</sup> Wertz, Walker, Frappier, Robbins, Lawrence, and several others. Exhibit 5-31.

<sup>67</sup> Exhibit 5-31; Exhibit 63, Declaration of Allison Winter.

with his own list of illegitimately elected precinct chairs.<sup>68</sup>

During this proceeding, the body offered Christ the option of speaking to them, and Christ declined, taking the position that the entire meeting was still at ease, as though the majority of the CEC could not act without his permission. Following Christ's comment, the body continued to discuss various issues surrounding his silence, and then adjourned the meeting.<sup>69</sup>

After the meeting had adjourned, and after consulting with his parliamentarian, Christ once again made the assertion that the actions taken at the meeting after he announced that it was "at ease" were invalid, ignoring the body's motions, votes, and resolutions that followed his inaction. Christ was undeterred by Scott Robbins, who addressed Christ directly regarding the Robert's Rules 8:2.4, which militates against a presiding officer's ability to unilaterally decide a meeting to be "at ease" meeting when objections are lodged.

#### **B. The Precinct Chair Group fills more vacant seats on January 3, 2023.**

On January 3, 2023, the CEC met in a regularly scheduled meeting in accordance with the December 20, 2022 call. With 51 precinct chairs in attendance, the meeting met quorum to conduct all of its business.<sup>70</sup> The body unanimously

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<sup>68</sup> Exhibit 5-29.

<sup>69</sup> Exhibit 5-31

<sup>70</sup> Exhibit 5-32 & 5-33.



voted to appoint four individuals to vacant chair positions: Lauren Vickers to precinct 39, Bill Philbert to precinct 42, Blake Hall to precinct 82, and Tanya Martinez to precinct 90. Judge Laird swore in the new appointees, leaving only precinct 10 as vacant.<sup>71</sup>

After the filling of the vacancies, the body discussed Bryan Christ and his behavior regarding the schism, and then passed a resolution for a vote of no confidence in Chair Bryan Christ.<sup>72</sup>

**C. The Precinct Chair Group complained to the SREC and mediation failed.<sup>73</sup>**

In August of 2022, 52 members of the CEC sent a formal complaint pursuant to Rule 8m to the State Republican Executive Committee. The SREC's Officials Committee examined the issue. RPT Chair Matt Rinaldi and Officials Committee Member Matt Patrick conducted a mediation between the factions in September of 2022 which was unsuccessful.

Matt Patrick wrote a summary of the failed mediation on November 18, 2022, for the Officials Committee. Though this memo was intended to be confidential, it has now been circulated publicly. In the memo, the Christ Group was identified as

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<sup>71</sup> Exhibit 5-33 & 5-37

<sup>72</sup> Exhibit 5-35.

<sup>73</sup> Relators include this point so that the Court recognizes that Relators have attempted every means of resolving this dispute before turning to the courts.

concocting false excuses for holding CEC meetings by Zoom. The Christ Group also admitted that the Precinct Chair Group was the larger of the two groups. The mediator specifically called out Christ and his allies for failing to even stay consistent with terms they verbally agreed to when putting together their “best offer” terms and constantly adding new terms.<sup>74</sup>

**D. The Christ Group is currently seeking to disenfranchise disfavored chairs by abusing the Texas abandonment rule, TEC 171.029.**

As indicated by the declarations of several precinct chairs, e.g., Allison Winter, Nelson Reyes, Melinda Olinde, and others, the Christ Group has begun attempting to remove what it considers disfavored, malcontent elected precinct chairs by accusing them of not attending four meetings and acting in ways inconsistent with ethical behavior as Chair Christ defines it, with an Ethics Committee to call members before it to be disciplined or be removed for abandoning their post if they fail to attend these meetings.<sup>75</sup>

Thus, the Christ Group is adding error to error, first appointing precinct chairs to filled positions, then using those individuals to achieve a false quorum, elect officers to positions that have already been filled, creating confusion at banks and

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<sup>74</sup> The memorandum is attached as a business record maintained by SREC Member Matt Patrick, Exhibit 6.

<sup>75</sup> See Declarations of Allison Winter, Nelson Reyes, and Melinda Olinde, Exh. 63, 40, and 34.

two state agencies, and now actively attacking elected precinct chairs because they refuse to attend inquisition-style committee meetings effectively for heresy.

**The dispute has impacted the CEC's required filings with the Secretary of State and the Texas Ethics Commission.**

**A. The CEC is required to file reports with the Texas Ethics Commission.**

As the Declaration of Charles Shirley shows, Shirley took over the financial reporting to the Texas Ethics Commission when he was elected as treasurer of the CEC on July 23. The CEC also voted to change banking contacts and on August 13, Shirley became its bank contact.

Shirley successfully filed the CEC's "Eight-Day Report" on October 31.<sup>76</sup> However, in December of 2022, Christ contacted the Texas Ethics Commission and successfully removed Shirley as the point of contact until Shirley and John Wertz worked with the Texas Ethics Commission's general counsel to straighten out the confusion in January of 2023.<sup>77</sup>

**B. Bryan Christ has incorrectly reported the precinct chairs to the Texas Secretary of State, a violation of his ministerial duties.**

Because the majority Precinct Chair group and the minority Christ Group have both filled precinct chair vacancies and officer positions that the other group

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<sup>76</sup> Exhibit 67, Declaration of Charles Shirley.

<sup>77</sup> *Id.*

holds as illegitimate, the two lists differ as follows:

	<b><u>Christ Group</u></b>	<b><u>Precinct Chair Group</u></b>
10	Clarence Lewis <sup>78</sup>	Vacant
72	Martha Ann Kate	Gwen Withrow
92	Destiny Stark	Mara Wasar
103	Kenneth Ditto	Thomas Bartley
26	John Thomas	Caleb Smith
56	Keith Lincoln	Jim Doyle
62	Stephen Wright	Jennifer Bowling
80	Richard VonRoble	Steven Foster
94	Cynthia Stinnett	Mary Lewis
101	Brenda Dunkley	Stephanie Schwantes
42	Jamie Nash	Bill Philibert
82	Jodi Runovar	Blake Hall
90	Brian Hagan	Tanya Martinez
39	Jeffrey Walding	Lauren Vickers
104	James Spurgin	Diane Campbell
111	Stanley Oatis	Patrick Teich
95	James Smith	Sherry Tavel
VC	Raquel Lewis	Jon P. Bouche
Treas	Mike Medved	Charles Shirley
Sec	Mark Frank	Staci Earnest

Some of those named as Christ Group appointees are unaware of the dispute.<sup>79</sup>

Since September of 2022, Bryan Christ has submitted his preferred names as precinct chairs, deliberately ignoring the appointments made during legitimate meetings called by CEC members. Even if his smaller group met quorum and had the legal ability to appoint chairs (which Relators do not agree as permissible) he cannot ignore these proper appointments.

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<sup>78</sup> The Christ Group alleges that it appointed him by email vote on January 6, 2023, which is not permitted in the Old Bylaws. See Exh. 63.

<sup>79</sup> See, e.g., Exhibit 53, Declaration of Patrick Teich.

## STATEMENT OF JURISDICTION

Section 273.061 of the Texas Election Code grants the Supreme Court subject matter jurisdiction to issue writs of mandamus to compel duties connected with the holding of an election and party conventions, respectively. Additionally, section 161.009 provides Texas courts mandamus authority to require officers of political parties to perform their duties imposed by law.

Political parties generally govern themselves, though section 163.003 of the Election Code requires their rules to be consistent with state law, and section 163.007 allows party rules to be enforced by mandamus as though the rules were statutes. This Court has granted mandamus relief to primary candidates for office when a party failed to perform its non-discretionary duties, e.g., allowing an office to close early and thus prevent a candidate from timely turning in his application. *Painter v. Shaner*, 667 S.W.2d 123 (Tex. 1984).

Additionally, Texas courts have jurisdiction over internal party affairs when asked to adjudicate disputes over whether candidates running in primary elections are qualified for the positions they seek. *In re Sanchez*, 366 S.W.3d 255 (Tex. App.—San Antonio 2012, no pet.).

By law, a county party chair is obligated to maintain a current list of precinct chairs and vacancies with the Texas Secretary of State.<sup>80</sup> A chair has seven days to report CEC changes and must provide the CEC's membership to party officers and candidates, which the Secretary of State posts on a public website, making these lists available to candidates, campaign vendors, and others.<sup>81</sup>

The process of filling vacancies in Texas involves a combination of the following authorities, from highest to lowest: the Texas Election Code; state political party rules; the rules adopted by a county executive committee ("CEC"); and Robert's Rules of Order. Each authority dictates some parameters to the process and delegates to the lower authority the remainder of the details.

Section 171.024 of the Texas Election Code requires each CEC to fill its vacancies, sets minimum standards governing the filling of vacancies, and then delegates to each political party the task of developing its own rules to fill vacancies. RPT 9 allows a CEC to set a quorum for filling vacancies ranging from 25% to 50%. Rule 8e instructs CEC to flesh out these rules at the first meeting following a primary, known as the Organization Meeting. The latest version of Robert's Rules of Order governs proceedings of the Republican Party of Texas and its CECs.<sup>82</sup>

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<sup>80</sup> TEC 171.024(e).

<sup>81</sup> RPT 8h.

<sup>82</sup> RPT 5. Exhibit 3, Old Bylaws, Art. X.

The CEC's chair is obligated to call the Organization Meeting, including in its agenda the process to fill CEC vacancies at its Organization Meeting with appropriate bylaws.<sup>83</sup> Additionally, the agenda *must* include the swearing-in of its members and adoption of bylaws.<sup>84</sup>

In the present dispute, Relators allege that Respondent has violated the above-described statutes and rules that give jurisdiction to this Court, and other ancillary rules which govern the filling of precinct chairs.

The deliberate actions by a county chair to ignore his ministerial and statutory duty to give notice to the Texas Secretary of State is a violation of a duty under the Texas Election Code, and his duty to report these appointments is a failure of his part of the duty given to CECs to fill precinct chair vacancies.

Additionally, the Texas Constitution confers original jurisdiction on the Texas Supreme Court to issue extraordinary writs. TEX. CONST. art. V § 3. The Court has mandamus jurisdiction under Texas Rule of Appellate Procedure 52.

Rule 51.1(e) of the Texas Rules of Appellate Procedure requires Relators to explain why this application was not first offered to the Ninth District Court of Appeals of Texas, which indisputably also has jurisdiction over this dispute. Relators

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<sup>83</sup> RPT 8i.

<sup>84</sup> RPT 8e.

assert that the political connections between Bryan Christ, the elected county chair, and all the elected officials with which he maintains a supportive role, will obligate many judges to recuse themselves. Justice Jay Wright, currently on the Ninth Court of Appeals, represented the Montgomery County Republican Party before taking the bench. Additionally, Kristin Christ, wife of Bryan Christ, has a commercial relationship with many elected officials in the district courts, and operates in the Lake Conroe Area Republican Women PAC and Magnolia Republican Club PAC, among others, which have given funds to many other candidates.

This reasoning is not to besmirch either Montgomery Chair Bryan Christ, his wife Kristin Christ, or any elected officials with whom they have worked; it is simply to circumvent obvious recusal issues.

Additionally, this petition was not first presented to the trial court or court of appeals due to the time-sensitive nature of this matter, as the facts of this case show that serious harm is occurring (removal of elected precinct chairs based on abandonment claims under TEC 171.029(a), and financial reports due to the Texas Ethics Commission are imperiled). This abuse will continue absent prompt relief.



## **ISSUES PRESENTED**

1. Was Martha Ann Kate's written resignation from her precinct chair position on June 7, 2022 effective as to the 2022-2024 biennium?
2. Did the Montgomery County Republican Party Executive Committee ("MCRP") validly fill six vacant precinct chair vacancies on July 23, 2022?
3. Was the August 13, 2022 meeting of the Christ/Byers faction of the MCRP and its actions void for lack of a valid meeting call?
4. Did the Precinct Chair faction of the MCRP validly appoint eight individuals to fill precinct chair vacancies on August 13, 2022?
5. Was the vote to lower the quorum to fill precinct chair vacancies and allow email voting for precinct chairs on September 6, 2022 invalid because such changes would require amendments to the executive committee's bylaws, and those rules were not followed, which among other requirements, would require an unmet 50% quorum to vote on the amendments?
6. Assuming Bryan Christ's duty to report precinct chairs to the Texas Secretary of State is a ministerial duty, what names must he report?

## ARGUMENT

**Response to Issue 1:** Martha Ann Kate resigned from her elected position as chair for precinct 72 for both the 2020-2022 and 2022-2024 bienniums by her unambiguous written resignation provided on June 7, 2022 to Chairman Christ.

Martha Ann Kate resigned in writing by an email sent on June 7th to the county chair and secretary, Bryan Crist and MCRP Secretary Raquel Lewis, after her reelection in March of 2022.<sup>85</sup> Christ rejected her resignation, asserting that it was ineffective as to the coming biennium.<sup>86</sup> However, on June 7, 2022, the Old Bylaws were in effect, Art. 3, section 6, of which states:

- If a member or an officer of the Executive Committee wishes to resign,
1. The member or officer must give written notice to the Secretary.
  2. If the notice is not specific to position of resignation, it applies to all positions held within the Executive Committee.
  3. If the notice is not specific to the effective date of the resignation, it is effective immediately upon receipt by the Secretary.
  4. Failure to follow the duties of a member is subject to formal reprimand, ...<sup>87</sup>

Since Ms. Kate's resignation did not specify if she was resigning from her existing term, her future term, or any committee, the resignation applied to all positions held within the Executive Committee, and it was "effective immediately upon receipt" by Raquel Lewis, the MCRP's secretary. *Id.*

There exists no basis for the contention that a precinct chair cannot resign

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<sup>85</sup> Exhibit 64, Declaration of Gwen Withrow.

<sup>86</sup> Exhibit 64, Declaration of Gwen Withrow.

<sup>87</sup> Exhibit 3 (2020-2022 Bylaws) (underlining added for emphasis).

before her term begins or is limited by the executive committee's ability to replace her. Additionally, Ms. Kate sent multiple emails to Withrow confirming her intent to resign as soon as Christ received the resignation.<sup>88</sup>

Christ has uploaded a list of chair vacancies to the Secretary of State, apparently multiple times, and all of them show precinct 72 to be held by Kate.<sup>89</sup>

REMEDY REQUESTED: Relators, particularly Gwen Withrow, ask that this Court issue mandamus to require Christ to recognize that Ms. Kate's resignation was valid on June 7, 2022, and further, for Christ to consider void every vote and meeting call in which she participated if her participation was material to the prevailing side.

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<sup>88</sup> Exhibit 64, Declaration of Gwen Withrow.

<sup>89</sup> Exhibit 5-28.

**Response to Issue 2:** The Montgomery County Republican Party Executive Committee legitimately filled six precinct chair vacancies and elected officers on July 23, 2022 after Bryan Christ refused to call or preside over the meeting.

The Organizational Meeting held July 19 set the stage for July 23.

Bryan Christ called the Organization Meeting of the CEC on July 19, 2022.<sup>90</sup>

After hours of disputed discussion and no material progress, other than adopting the substitute (amended) agenda, which had a provision to not adjourn until the agenda was complete. Fred Sunderman moved for adjournment to allow the two factions to speak and resolve their differences, intending a motion to adjourn “to a convenient time” under Robert’s Rules. After an inconclusive voice vote, Christ ignored calls for a division of the house and adjourned the meeting.<sup>91</sup> Christ’s adjudication of this motion to adjourn was inconsistent with Robert’s Rules, which as follows:

In announcing an affirmative vote on a motion to adjourn, the chair should usually pause before declaring the meeting adjourned, saying: “The ayes seem to have it. [Pausing and resuming slowly:] The ayes have it, and the meeting is adjourned.” The pause affords time for members to demand a division on the vote to adjourn, or to take any of the other steps just described. If the chair learns, immediately after declaring the assembly adjourned, that a member seeking the floor for one of these purposes had risen and addressed the chair before the adjournment was declared, then, since the adjournment was improper and this breach was promptly noted, the chair must call the meeting back to order-but only long enough for the purpose for which the member legitimately sought the floor.<sup>92</sup>

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<sup>90</sup> The July 19, 2022 meeting is online at <https://www.youtube.com/watch?v=zBMEzhblycA>. Pinpoint cites are to this video. All URLs in this petition were last accessed on February 13, 2023. Christ’s Email is attached as Exhibit 5-1; The meeting minutes are attached as Exhibit 5-6.

<sup>91</sup> See Exhibit 50, Declaration of Fred Sunderman; See <https://www.youtube.com/watch?v=zBMEzhblycA> at 3:17:34-18:15 for the motion to adjourn to a convenient time, governed by RONR 9:17, attached as Exhibit 4.

<sup>92</sup> See RONR 21:12, Attached as Exhibit 4.

Though RPT rules require CECs to adopt bylaws and rules for filling their vacancies at their Organizational Meeting, the Montgomery County Republican Party failed both those duties.<sup>93</sup> The CEC therefore adopted its 2020-2022 Bylaws (“Old Bylaws”) by operation of RPT 8e, the only effective result of the meeting.<sup>94</sup>

### The July 23rd Meeting

To complete the work of the adjourned organization meeting, 39 precinct chairs and SREC member Gwen Withrow signed a petition for a second meeting and sent it to Bryan Christ on July 21<sup>st</sup> (“Walker Call”).<sup>95</sup> The Walker Call was emailed on July 21 at 8:55 a.m., and set the emergency meeting for July 23.<sup>96</sup>

CEC member James Byers emailed a *second* petition call allegedly signed by 21 members to Christ at 4:36 p.m. that same day (“Byers Call”).<sup>97</sup>

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<sup>93</sup> See TEC 171.024(a), RPT 8e and 8i. After a quorum of 69 was met, the July 19th meeting became bogged down for hours over a motion to substitute the original agenda for an amended agenda. After that motion passed, member James Byers asserted a dilatory point that the amended agenda had the title “Freedom Caucus” on it, claiming that he did not know what meeting he was attending. Christ supported the asserted confusion, causing more delay, with the result of a three-hour meeting that accomplished nothing.

<sup>94</sup> See substitute agenda, Exhibit 5-4, and Meeting Minutes Exhibit 5-6; Relators disagree that Christ could take a mere majority vote to adjourn, because the agenda that was adopted earlier that evening after a motion to substitute explicitly stated, “Adjourn at the completion of this agenda (RONR 21:3,” and would thus require a two-thirds vote to adjourn. However, resolution of the question is not relevant to this pleading. Christ never called either meeting on July 23rd.

<sup>95</sup> Ms. Withrow serves as State Representative Executive Committee representative for Senate 4; Exhibit 64; Declaration of Ms. Withrow.

<sup>96</sup> Exhibit 5-7 & 5-8.

<sup>97</sup> See Exhibit 5-9 & 5-10; The significant difference between the two calls, beside the recognition that the Walker Call was signed by nearly twice as many signatories on the Byers Call, was the *improper* inclusion of a virtual participation option in the Byers Call. RONR 9:36

As the facts above relate, Christ received two valid calls for the July 23<sup>rd</sup> meeting,<sup>98</sup> but he never called a meeting. Instead, Robert Walker called the meeting, pursuant to RONR 62:9-12.<sup>99</sup>

Walker asked for the roll call of the precinct chairs.<sup>100</sup> Staci Earnest called the roll; 55 elected precinct chairs responded as present, far exceeding the 25% needed for non-statutory business and 33% to fill precinct chair vacancies.<sup>101</sup>

The body then elected SREC member Dale Inman to preside over the meeting.<sup>102</sup> Proceeding with the agenda in the Walker Call, SREC member Gwen Withrow was called to swear in the CEC members, a requirement that should have been met during the Organizational Meeting.<sup>103</sup> The body approved new bylaws

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describes the requirements for a proper electronic meeting call, and states that the call must “include an adequate description of how to participate in it, e.g., the telephone number to call for a teleconference. The Byers Call had no details regarding any Zoom link or hint of the details of how to participate.

<sup>98</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 2:35.

<sup>99</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 11:55 in the video; RONR 62:9-12 describes the steps necessary for a body to replace a presiding chair who is failing his duties.

<sup>100</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 28:44.

<sup>101</sup> Relators assert that the July 23<sup>rd</sup> meeting was a continuation of the July 19<sup>th</sup> Organizational Meeting and quorum was thus “those present”. The meeting included a discussion of whether the meeting was a continued meeting of the July 19<sup>th</sup> meeting, or a new meeting; this pleading assumes the more stringent requirements under the Old Bylaws at Art. 3, Sec. 4(A) to avoid any factual dispute.

<sup>102</sup> Bryan Christ interrupted the meeting to announce he was leaving after the election of Inman to preside and left as the members were sworn in.

<sup>103</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:08:31.

(“New Bylaws”) by a unanimous roll call vote of 37 in favor.<sup>104</sup> The body then elected officers Jon Bouche for Vice-Chairman, Staci Earnest for Secretary, Charles Shirley for Treasurer, additional steering committee members, as well as other committee heads and members.<sup>105</sup> Most importantly, the body appointed six precinct chairs, Gwen Withrow, Mara Waser, Thomas Bartley, Mary Lewis, Stephanie Cox, Diane Campbell, and Allison Winter.<sup>106</sup>

Bryan Christ has asserted that quorum had dropped below 40% and thus could not have elected officers, but the record does not reflect that fewer than 40% of the members remained. Christ appears to be asserting that the 37 votes in favor of the bylaws adoption inexorably establishes that only 37 voters were present, but that is a mere assertion without evidence. The record shows that Christ and a handful of others left. Total membership was less than 100 at the beginning of the meeting, so 40 members would meet a quorum requirement of 40%. Neither the video nor minutes of the meeting indicate that the members present had decreased from 55 to

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<sup>104</sup> <https://www.youtube.com/watch?v=k-sdj-oDqqs> at 1:29:26. This result would have successfully passed even if a 2/3rds majority was required.

<sup>105</sup> Specifically, in addition to the three officers elected, the body elected five steering committee members, as well as Allison Winter as Vacancy Chair and John Wertz as Victory Chair;

<sup>106</sup> Christ disputes that Precinct 72 was vacant, asserting that Kate’s resignation was invalid. This was discussed in Issue 1.

less than 40, nor was there any call to ensure quorum was still met; quorum is therefore presumed. RONR 40:12.

Bryan Christ has also asserted that votes in favor of all precinct chairs at this meeting are invalid, citing the Vacancy Committee rule which states, “Each vacancy is voted separately.” However, the natural reading of this rule indicates that it is a rule which governs the Vacancy Committee, and the vote taken by the Vacancy Committee must be by individual vote. There exists no evidence to suggest that the CEC must vote to fill vacant precinct chairs individually.

The parties have disputed whether this July 23rd meeting was a continuation of the July 19th Organizational Meeting. Member Fred Sunderman’s motion to adjourn was couched with language indicating that the adjournment was for the purpose of gaining time for the two factions to discuss their differences and come back together to finish the meeting, and thus a motion to adjourn to a time convenient, governed by RONR 9:17. However, Christ inappropriately adjourned the meeting and ignored calls for a division, so this issue was not properly managed. However, this distinction is irrelevant, as the called meeting was proper and quorum was established to accomplish all that which occurred. And, as previously noted, the amended agenda stipulated the meeting was not to be adjourned until the meeting was completed (RONR 21:3).



Additional Repercussions: As detailed below, Christ’s refusal to recognize Charles Shirley as the CEC Treasurer resulted in a conflicting process after his minority group “temporarily” appointed a treasurer, and both treasurers attempted to file reports with the Texas Ethics Commission. This confusion has already been the subject of several disputes with the Texas Ethics Commission, as the Declaration of Charles Shirley details at length and as discussed above.<sup>107</sup> There is no reason to believe that this dispute will not continue as long as two sets of executive officers are claiming the titles.

REMEDY REQUESTED: Relators ask that this Court issue mandamus to require Christ and the other Real Parties in Interest to recognize that all elections and appointments made on July 23, 2022 were valid, including but not limited to the appointments of Gwen Withrow, Mara Waser, Thomas Bartley, Mary Lewis, Stephanie Cox, Diane Campbell, to the position of precinct chair, and the CEC elected officers Jon Bouche as Vice-Chairman, Staci Earnest as Secretary, and Charles Shirley for Treasurer. Further, Relators ask that you issue mandamus to Bryan Christ, ordering him to submit the named precinct chairs to the Texas Secretary of State in accordance with the Texas Election Code.

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<sup>107</sup> Exhibit 67, Declaration of Charles Shirley.

**Response to Issue 3:** The Byers Call for a meeting to be held on August 13, 2022, was void for lack of sufficient signatories and thus no action taken at the meeting chaired by Bryan Christ that day was valid, including all election of executive officers, steering committee members, and other committee chairs.

As described above, Christ sent out a meeting call based on a petition from Byers with only 19 signatures of CEC members (“Byers Call”).<sup>108</sup>

All parties agree that the Old Bylaws govern these meetings, and the Old Bylaws state that a meeting call by petition must be supported by 20% of the membership of the body, as shown below:

## **Section 2. Meeting Calls**

Regular and statutory meetings shall be called by the County Chairman or the Steering Committee. Special meetings of the Executive Committee may be called by the County Chairman, with the approval of a majority of the Steering Committee. Special meetings also may be called by written petition signed by twenty percent (20%) of the total membership (not including vacancies) of the Executive Committee delivered to the Chairman, the Steering Committee, or to the Secretary at least fourteen (14) days before the desired meeting date, or in the event of a stated emergency, two (2) days. The purpose and order of business of the meeting must be stated in the call for any statutory, regular, or special meeting.<sup>109</sup>

According to the Christ Group, the total number of precinct chairs filled on August 13, 2022, was 98, which it reported in its minutes.<sup>110</sup>

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<sup>108</sup> Exhibit 5-16. Under the Old Bylaws, calls for an emergency meeting require a petition of at least 20% of the CEC’s membership.

<sup>109</sup> Exhibit 3, Old Bylaws, Art. VI, Section 2.

<sup>110</sup> Exhibit 5-17, Minutes for August 13, 2022 Meeting (Christ Group).

If a group has 98 members, then to have the signatures of 20% of that group one needs 19.6 signatures, which means 19 signatures is not enough. Thus, the meeting call was insufficient, and no efficacious meeting occurred.

If the Court recognized the six appointments made on July 23, 2022, by the CEC meeting that Christ does not recognize, then there would be 101 members, and the failing of the meeting call is even more obvious.

REMEDY REQUESTED: Relators asks that this Court issue mandamus to require Christ and the other Real Parties in Interest to refrain from any action dependent on any authority provided by a motion, resolution, appointment, or other like action taken at the Christ Group's August 13<sup>th</sup> meeting.

**Response to Issue 4:** The Montgomery County Republican Party Executive Committee validly appointed eight individuals to fill precinct chair vacancies on August 13, 2022.

The Precinct Chair Group indisputably had 43 members present at its meeting on August 13, 2022.<sup>111</sup> As reported in the minutes of that meeting, the following were appointed to vacant precinct chair positions: Caleb Smith (26), Bobbi Bodenhamer (54), Jennifer Bowling (62), Steven Foster (80), Sherry Tavel (95), Stephanie Schwantes (101), Jackie Williams (107), and Patrick Teich (111).<sup>112</sup>

To alleviate any argument about group votes, the CEC affirmed these same individuals and the six appointed on July 23<sup>rd</sup> by affirming votes individually on September 6 in an abundance of caution and to eliminate the criticism stemming from the “individual vote” language Christ had used to support his objection to the legitimacy of these appointments.<sup>113</sup>

**REMEDY REQUESTED:** Relators ask that this Court issue mandamus to require Christ and the other Real Parties in Interest to recognize that Caleb Smith (26), Bobbi Bodenhamer (54), Jennifer Bowling (62), Steven Foster (80), Sherry

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<sup>111</sup> Exhibit 5-19, Minutes for the CEC Meeting on August 13, 2022 (Precinct Chair Group).

<sup>112</sup> Exhibit 5-20. The Christ Group claims that the body’s appointment of six chairs with one voice vote violated the vacancy committee’s rule at Art. 7, Sec. 2, because each individual must be voted on separately. This bylaw rule does not apply that rule to the filling of vacancies, but is applicable only to the committee’s nomination process.

<sup>113</sup> Exhibit 5-24, Meeting Minutes for September 6, 2022.

Tavel (95), Stephanie Schwantes (101), Jackie Williams (107), and Patrick Teich (111) are the legitimately-appointed chairs of their precincts and to submit the named precinct chairs to the Texas Secretary of State.

**Response to Issue 5:** The attempts to lower the quorum requirement to fill precinct chair vacancies and allow email voting for precinct chairs on September 6, 2022 were invalid because such a change would require amendments to the committee's bylaws, and such a change did not occur.

The Christ Group purportedly lowered the required quorum from 33% to 30% by a resolution on September 6, 2022, and also passed a resolution to allow email voting to fill vacant precinct chair positions.<sup>114</sup>

The Christ Group cite RPT Rule 7(c) for their ability to allow electronic mail voting to fill precinct chair vacancies. While RPT rules do allow a CEC to adopt electronic mail voting, the RPT rules do not require a CEC to allow email voting. Thus, the Old Bylaws, which do not allow for such voting, apply. To allow electronic voting and lower the quorum required, the Old Bylaws would have to be amended, which requires substantial steps, including a vote of more than 50% of the CEC's participation. No such vote occurred.

**REMEDY REQUESTED:** Relators ask that this Court issue mandamus to require Christ to refrain from submitting any name to the Texas Secretary of State as a precinct chair who has obtained his position by a vote at a meeting of less than one-third quorum.

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<sup>114</sup> Exhibit 5-22.

**Response to Issue 6:** Assuming Bryan Christ's duty to report precinct chairs to the Texas Secretary of State is a ministerial duty, what names must he report?

The county chair of every party in Texas has a ministerial duty to report the names of validly appointed precinct chairs.

Based on the information above, the Montgomery County Republican party Executive Committee has appointed the following individuals to fill precinct chair vacancies: Sherry Tavel (95), Jennifer Bowling (62), Jackie Williams (107); Patrick Teich (111); Diane Campbell (104); Stephanie Cox (98); Mary Lewis (94); Thomas Bartley (103); Caleb Smith (26); Gwen Withrow (72); Stephen Foster (80); Mara Waser (92); Bobby Bodenhamer (54); and Stephanie Schwantes (101).

There is no arguable dispute over these individuals, whether the discussion is the call of the meeting, the quorum of the meeting, or how they were appointed.

REMEDY REQUESTED: Relators asks that this Court issue mandamus to require Christ to report the names listed above to the Texas Secretary of State as chairs for their respective precincts.

## **PRAYER & CONCLUSION**

There is no doubt that this case presents a significant number of small details and facts, each of which have bearing on events downstream. But Relators assert that the commanding facts of the case are not in dispute.

Bryan Christ is not doing the job he was elected to do by the Republicans of Montgomery County. He is abusing his office and playing sandbox bully while defaming or ignoring those who should be his allies. This application for writ of mandamus will not fix this dysfunctional family. However, this case can put this executive committee back on track in a way that will ensure that Texas statutes are followed, that the public has an accurate list of properly-appointed or elected precinct chairs and a proper list of vacancies. It will ensure that the treasurer preferred by the majority of the executive committee can file financial reports required by the Texas Ethics Commission without interference and interact with banks without confusion.

Relators make these requests with the humility of those who know they ask a busy court to resolve a matter based in part on party and parliamentary rules, but if this state cannot corporately ensure that the lowest rung of our representatives is correct, then it cannot hope to master the bigger issues of election integrity.



Relators represent the people in our system who are in the trenches, putting down yard signs, making phone calls, and educating their neighbors. Without this Court's intervention, these people will be subject to the whims of a single person, contrary to Texas law.

To adjudicate this matter, Relators ask that the Court set a briefing schedule allowing two weeks for Bryan Christ to respond, and ten days for Relators to reply. It is Relators' hope that Christ will stipulate to an abatement of his "ethics committee" meetings that target elected precinct chairs during this adjudication. If he is amenable, no injunction will be sought; if he is not amenable, then Relators will file an application for an injunction while this application is pending.

Relators recognize that this application is long and have previously obtained this Court's permission to file a petition of this word length.

Lastly, Relators ask for all other appropriate relief to which they are entitled.

Respectfully submitted,  
By: /s/Warren V. Norred  
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ATTORNEYS FOR RELATORS

## **CERTIFICATIONS**

### **CERTIFICATE OF SUPPORT**

Pursuant to Tex. R. App. P. 52.3(j), I certify that I have reviewed this Application and concluded that every factual statement in the Petition is supported by competent evidence included in the record filed concurrently.

/s/Warren V. Norred  
Warren V. Norred

### **CERTIFICATE OF SERVICE**

In accordance with Tex. R. App. Pro. 9.5(e), the undersigned hereby certifies that a true and correct copy of the foregoing application has been sent by e-service, on this 20<sup>th</sup> day of February, 2023, by email to Respondent Bryan Christ, his counsel Eric Opiela, and all Real Parties in Interest.

/s/Warren V. Norred  
Warren V. Norred

### **CERTIFICATE OF COMPLIANCE**

The undersigned hereby certifies that, pursuant to Tex. R. App. Pro. 9.4(i)(2)(D), the number of words in this document is 9732, based upon the word counter of MS Word.

/s/Warren V. Norred  
Warren V. Norred

### **APPENDIX:**

- I. Governing Authorities
- II. Business Records
- III. Declarations of Relators
- IV. Declarations of Non-Party Witnesses

**No. 23-0127**

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**In the Supreme Court of Texas,  
Austin, Texas**

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In Re:

The MoCo Precinct Chair Group, et al.,  
Relators.

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**Petition for Writ of Mandamus  
Appendix I**

I. Governing Authorities

Exhibit 1. Texas Statutes (available upon request)

Exhibit 2. Bylaws, Republican Party of Texas, September 24, 2022

Exhibit 3. Bylaws, Montgomery County Rep. Party Exec. Comm., 2022-2024

Exhibit 4. Excerpts, Robert's Rules of Order, Newly Revised, 12th Ed.

**GENERAL RULES FOR ALL CONVENTIONS AND MEETINGS****Rule No. 1 – Adoption and Amendment of Rules; Clarification**

These Rules, having been filed with the Secretary of State of Texas, together with the statutes, rules, and bylaws adopted by reference shall constitute the Rules of the Republican Party of Texas (“Rules”).

- a. Amendments – Amendments to Rules may be proposed by:
  1. Majority vote of the State Republican Executive Committee (“SREC”), at any meeting properly called and constituted, provided at least seven (7) days prior written notice of the full text proposed has been given in writing to each member thereof; or
  2. The Permanent Rules Committee of any State Convention.
- b. Adoption – These Rules, with the exception of Permanent State Executive Committee Rules required or authorized by state law, may be changed only by action of a State Convention, such action reflecting a majority of votes cast by delegates present and voting. When any change is made a certified copy of the changes shall be filed with the Secretary of State not later than thirty (30) days following their adoption.
- c. Temporary and Emergency Changes – The SREC in its best judgment, by a two-thirds (2/3) vote of those present and voting, provided prior written notice of the full text proposed has been given to each member thereof, may prescribe such temporary and emergency changes of these Rules so as to permit the orderly conduct of the affairs of the Republican Party of Texas in accordance with the intent and purpose of these Rules. Such temporary and emergency changes may be made when the conduct, operation, or implementation of these Rules will become frustrated or impracticable, or contrary to their intent and purpose, if by reason of:
  1. valid laws enacted by the Legislature of the State of Texas;
  2. any administrative or judicial action of any officer, or agency of the State of Texas or any county or political subdivision thereof, or of the Federal Government;
  3. any interpretation of these Rules as they relate to The Rules of the Republican Party (national) by any duly authorized official of the Republican National Committee; or
  4. technical inconsistencies or defects.Any such changes shall be valid only until such time, if any, as they are ratified or amended by the next subsequent State Convention, or until the adjournment of such State Convention, whichever shall occur first.
- d. Permanent State Executive Committee Rules – The SREC, as authorized by Section 163.004(a)(2)(B), Texas Election Code (“TEC”), by a two-thirds (2/3) vote of those present and voting, provided at least seven (7) days prior written notice of the full text proposed has been given to each member thereof, may prescribe Permanent State Executive Committee Rules that are not subject to amendment by action of a State Convention.
  1. These Permanent State Executive Committee Rules may be amended by the SREC by a two-thirds (2/3) vote of those present and voting at any meeting properly called and constituted, provided at least seven (7) days prior written notice of the full text proposed has been given in writing to each member thereof. Any Permanent State Executive Committee Rule shall be identified in these Rules by the notation “(Permanent State Executive Committee Rule).”

2. At the first meeting of each term the SREC may, by a vote of a majority of those present and voting, delegate temporary authority to amend a Permanent State Executive Committee Rule to a State Rules Committee of the subsequent State Convention, except for Rule No. 1, as the State Rules Committee determines and reports to the State Convention for consideration. Said temporary authority shall expire with the adjournment of the State Convention. Any Permanent State Executive Committee Rule delegated to the State Convention shall be identified in these Rules by the notation “(Permanent State Executive Committee Rule delegated to the State Convention).”
- e. Deleted by the State Executive Committee on August 28, 2021 in Lubbock, Texas. (Temporary Rule)
- f. Clarification – Any member of the Republican Party of Texas who discovers an ambiguity in these Rules may request in writing a clarification from the County Chairman or the State Chairman. Clarification from the State Chairman shall be binding on all members of the Republican Party of Texas until final clarification is made by majority vote of the SREC. Any clarification made shall be to maintain the intent and purpose of these Rules as originally adopted.
- g. Definitions – Pursuant to the incorporation of Section 311.014 of the Texas Government Code under Rule No. 4 of these Rules, when computing any period of days referred to in these Rules, the first (1st) day is excluded and the last day is included. Also, if the last day of any period of days is a Saturday, Sunday, or legal holiday, then the period is extended to include the next day that is not a Saturday, Sunday, or legal holiday.
- h. Titles in any rules or supplemental rules of this party or its conventions are non-substantive and for informational purposes only.

**Rule No. 2 – Publication and Distribution of Rules**

In order to publicize these Rules throughout the state, the most recent version thereof and links to those pertinent portions of the TEC dealing with Party conventions at all levels shall be maintained on the Republican Party of Texas website and mailed or e-mailed to each County Chairman and each Senatorial District Convention Chairman with instructions to mail or e-mail a copy to each Precinct Chairman and to each County or Senatorial District Convention Committee Chairman. Upon request, a copy shall be provided to any delegate or alternate to the State Convention and to any other interested person who shall request the same; and an adequate supply thereof shall be maintained at the Republican Party of Texas Headquarters to fill requests. A charge, which shall be no greater than the unit cost of printing and postage, may be made for requested copies of these Rules.

**Rule No. 3 – Discrimination Prohibited**

Participation in any Republican convention or meeting including, but not limited to, any primary caucus, any meeting or convention held for the purposes of selecting delegates to a County, District, State, or National Convention shall in no way be abridged for reason of sex, age, race, religion, color, or national origin.

**Rule No. 4 – Adoption by Reference: Constitution of the United States, Constitution of the State of Texas and Statutes**

The Constitution of the United States, the Constitution of the State of Texas, and the statutes of the United States and the State of Texas, insofar as they may be applicable, are hereby adopted by reference and shall govern the conduct of all conventions and meetings of the Republican Party of Texas from the precinct level through the state level. Nothing in these rules shall be deemed to waive any rights of the Republican Party of Texas, including, but not limited to, those described in the Constitution of the United States and the Constitution of the State of Texas.

**Rule No. 5 – Parliamentary Authority**

Unless otherwise provided for by the Constitution of the United States, the Constitution of the State of Texas, the statutes of the United States or the State of Texas, or these Rules, the current edition of *Robert's Rules of Order Newly Revised*, which is hereby adopted by reference, shall be the parliamentary authority governing all conventions and meetings of the Republican Party of Texas from the precinct level through the state level, inclusive.

**Rule No. 6 – Proxies Prohibited**

The use of proxies or proxy voting is hereby prohibited in all Republican Party of Texas proceedings, from the precinct level through the state level, inclusive, except the SREC, according to Section 171.004(a) of the Texas Election Code.

**Rule No. 7 – Casting Votes**

- a. At all conventions, executive committee meetings, and any other Party meetings, votes shall be cast and counted in the manner prescribed by the current edition of *Robert's Rules of Order Newly Revised*; and except as provided in this rule, the vote of each member shall have equal weight. In any convention, except a Precinct Convention or a State Convention when organized in Congressional District Caucuses, any delegation present, upon request, shall be permitted, during a roll call vote or a secret ballot vote, to cast the number of votes equal to the number of delegates to which it is entitled on any item of business.
- b. A roll call vote shall be taken:
  1. when ordered by majority vote of the delegates at any convention, caucus, or meeting, or
  2. when demanded by one-fifth (1/5) of the participants at a Precinct Convention, or
  3. when demanded in writing by at least one-fifth (1/5) of the delegations from the precincts represented at a County or Senatorial District Convention, or
  4. when demanded in writing by at least one-fifth (1/5) of the delegations from the districts represented at a State Convention, or
  5. when demanded in writing by one-fifth (1/5) of the members in the case of a committee meeting, Party caucus, or
  6. when ordered by a Convention Chairman, or
  7. for final adoption of any SREC bylaw or standing rule, any amendment to an RPT rule, any item in the report of the resolutions committee, or other motion presented in the form of a resolution in a meeting of the SREC, except that this requirement may be waived for any individual motion by unanimous consent. The SREC secretary shall make the roll call vote available on the public portion of the RPT website within ten (10) business days of the adjournment of the SREC meeting.

In the event of a roll call vote at a convention other than a precinct convention, each Delegation Chairman shall poll the delegation and shall announce the result when the delegation is reached. If any delegate doubts the correctness of the announcement, the Secretary of the meeting shall poll such delegation and announce the result.

- c. A county executive committee may authorize voting to fill precinct chair vacancies via mail or email.
- d. For any Party meeting where online voting is permitted, a vote from an online participant shall have the same force as a vote from an in-person participant.

**Rule No. 8 – Supplementary Executive Committee Rules and Meetings**

- a. Compliance Required – The SREC, each county executive committee, each district executive committee, and any committee or sub-committee created by any Bylaws or Rules adopted by same, shall comply with and be established in accordance with these Rules.
- b. Supplemental Rules Permitted – The SREC elected at the biennial State Convention or a county executive committee elected in biennial primary election or a district executive committee created pursuant to the TEC or the bylaws of any political subdivision within the Party, may adopt supplemental rules or bylaws, provided however that such rules or bylaws do not conflict with any rules or bylaws of a higher authority including, but not limited to, these Rules. All such rules and bylaws shall be filed with the SREC and with the Secretary of State and are hereby adopted by reference.
- c. Organizational Meeting and First Quarterly Meeting of the State Republican Executive Committee – The SREC shall hold its organizational meeting after the adjournment of the biennial State Convention. The agenda of the organizational meeting shall include, but not be limited to the adoption of Bylaws and/or Rules for the biennium. Upon the adoption of the SREC Bylaws or Rules by the SREC, at the SREC organizational meeting, the SREC Bylaws and Rules shall be amendable at this meeting and the first quarterly meeting by a majority of the entire membership.
- d. The SREC Bylaws may only be amendable by a two-thirds (2/3) vote of the full body for any SREC meeting following the first quarterly meeting subject only to adopted notice requirements.
- e. Organizational Meeting of a County Executive Committee – A County Executive Committee shall hold its organizational meeting within forty-five (45) days after the term of office begins for the County Chairman and the Precinct Chairmen. (The term of office begins twenty (20) days after the Primary Runoff Election according to Subsection 171.022 (c) of the TEC.) The County Chairman shall be responsible for calling the meeting; however, if the County Chairman does not call the meeting, then one-fourth (1/4) or fifty (50) of the Precinct Chairmen whichever is fewer, may, by written demand, call an organizational meeting. Notice of the organizational meeting and a copy of any proposed Bylaws and/or Rules shall either be mailed via the USPS or emailed, and be posted on the county party website, if available. Delivery will be to the last known address of the members of the executive committee at least seven (7) days prior to the date of the meeting. Such notice shall state the time, date, and location of the meeting and the names(s) of the person(s) issuing the call. The agenda of the organizational meeting shall include, but not be limited to, the swearing in of the newly elected executive committee

- members and the adoption of Bylaws and/or Rules for the biennium. Failure to adopt bylaws and/or rules for the current biennium by a majority of those present and voting shall enact the previous biennium's bylaws and/or rules.
- f. Limitations on County Executive Committee Meetings – No county executive committee meeting shall be held two (2) days prior, during, or two (2) days after the week of the biennial State Convention or the quadrennial National Convention.
  - g. Open Meetings and Right to Testify – All meetings of any State or County Executive Committee or its committees, subcommittees, or ad hoc committees shall be open to any member of that executive committee, and they shall have the right to appear before any such committee, subcommittee, or ad hoc committee and make recommendations for the committee's consideration or testify concerning any item under purview of the committee and to record or livestream the proceedings of any meeting not held in executive session with electronic devices. The committee may adopt reasonable rules including time limits for such presentations and may establish a reasonable limit of time for these presentations. This Rule does not preclude the committee from going into executive session; however, such executive session(s) shall be open to any member of the executive committee including ex-officio members.
  - h. The County Chairman shall maintain a current list of the name, mailing address, phone number, email address (if available), and precinct number of every Republican Precinct Chair who was elected in the Primary, the Primary Runoff, or was appointed by the County Executive Committee to fill a Precinct Chair vacancy. The list shall be updated within seven (7) business days of an election changing the status of the list and shall be made available at reproduction costs or by email to any Republican Precinct Chair, Republican Party Official, Republican Elected Office Holder, or Republican Candidate for Elective Office of the county requesting such.
  - i. Filling Vacancies on a County Executive Committee (Permanent State Executive Committee Rule) – A county executive committee shall, by majority vote at its organizational meeting, adopt a bylaw and/or rule for filling vacancies on the County Executive Committee.
  - j. Permit Electronic Executive Committee Meetings – In the event of a stated emergency, as declared by the Chairman, an Executive Committee Meeting may be conducted through use of electronic meeting services designated by the Chairman. In the event an Executive Committee Meeting is held electronically, the electronic meeting must allow for the real time sharing and viewing of committee documents, including the current motion, any amendments to that motion, and any reports that the committee considers.
  - k. Removal of County Chairman for Abandonment of Office or Ineligibility – If the County Executive Committee (CEC) by a majority vote of the full body, finds that a county chair is in violation of Texas Election Code 171.029 or is no longer eligible for office as required by Texas Election Code 141.001, the CEC shall send a resolution and supporting documentation to the SREC officials committee to begin an official review for remedy. Nothing in this rule prohibits any person affiliated with the Republican Party of Texas from causing a resolution to be considered by the State Republican Executive Committee as outlined in Texas Election Code section 171.029(c). The County Chairman being reviewed must be notified at least seven (7) days in advance of any meeting concerning his or her



removal and must be offered the opportunity to present his or her own defense before a vote on removal is taken.

- l. No member of a State Executive Committee, County Executive Committee, or State Convention Committee may vote on any issue for which the member is a registered lobbyist or has a substantial interest, as defined by the Local Government Code Title 5 subtitle C section 171.002, with respect to the issue to be voted upon.
- m. SREC Officials Committee Mediation of Disputes – County Chairmen or County Executive Committees may elect to submit disputes between them to the SREC Officials Committee for mediation in lieu of litigation. The SREC Officials Committee may elect to accept or decline the role of mediator on a case-by-case basis.
- n. Elected Party Officials' Misconduct in Office – A Precinct Chair, County Chair, or SREC member may be deemed to be derelict in the execution of his or her responsibilities in office, by:
  1. Failing to perform statutory duties; or
  2. Failing to attend two (2) consecutive statutory Executive Committee Meetings; or
  3. Embezzling County Executive Committee funds; or
  4. Being convicted of election fraud; or
  5. At least three other documented instances of sufficiently egregious conduct that the Republican Party in that county or Senatorial District is subjected to public disgrace.

The Elected Party Official being reviewed must be notified at least seven (7) days in advance of any meeting concerning his or her sanction and must be offered the opportunity to present his or her own defense before a vote on sanction is taken.

Regarding a Precinct or County Chair, a written complaint signed by at least sixty percent (60%) of the voting membership of the County Executive Committee, or regarding an SREC member, a written complaint signed by at least sixty percent (60%) of the voting membership of the District Executive Committee, shall be forwarded to the Officials Committee of the SREC. If the Officials Committee finds the complaint has merit, the Officials Committee shall conduct a hearing on the conduct of the Precinct or County Chair, or SREC member, and shall forward a recommendation to the State Chairman to pursue appropriate remedy.

- o. All proposed disciplinary (including censure) actions by a County Executive Committee that have continuing effect, under these rules shall be in writing and shall be included by the Chairman on the agenda of the notice of meeting posted in compliance with the rules of the County Executive Committee. Upon receipt of a resolution regarding censure from a County Executive Committee, the Chairman of the Republican Party of Texas shall cause consideration of the resolution to be included on the agenda at the next scheduled meeting of the State Republican Executive Committee (SREC). Both bodies shall send the subject of the disciplinary action (including censure) notice by certified mail at the same time as the notice of meeting is posted.
- p. Per Texas Election Code 171.022, the voting members of the County Executive Committee are the County Chairman and Precinct Chairman. The County Party may adopt rules allowing an SREC member who does not live in the same County to be a non-voting ex-officio member, and an SREC member who is not the County Chairman or a Precinct

Chairman of the same county may not make motions or vote in that County's Executive Committee meetings.

**Rule No. 8A – Petition Required for County Chairs in Certain Counties**

(Permanent State Executive Committee Rule) – Persons filing for the office of County Chair in a county with a minimum of eight (8) incumbent precinct chairmen shall include a nominating petition containing the signatures of at least 10 percent of the incumbent precinct chairs serving on the County Executive Committee, or two (2) – whichever is greater, using a form of promulgated by the Republican Party of Texas. The nominating petition shall contain the candidate's sworn oath that each of the signatures thereon is of an incumbent Precinct Chair and was signed in the presence of the candidate. Any county executive committee of a county with a population of fewer than 300,000 may, by majority vote, opt out of this requirement.

**Rule No. 9 – Executive Committee Quorum**

- a. Non-Statutory Business and Filling Vacancies – At County or District Executive Committee meetings, one-fourth (1/4) of the membership, excluding vacancies, shall constitute a quorum for conduct of non-statutory business. As provided by Section 171.024(c), TEC, the SREC has designated one-fourth (1/4) of the membership, excluding vacancies, or such greater percentage, not to exceed a majority of the membership, as may be specified in County Executive Committee Bylaws and/or Rules as the quorum for filling vacancies on County Executive Committees (Permanent State Executive Committee Rule). At SREC meetings, the quorum for conduct of non-statutory business shall be in accordance with the SREC Bylaws. If the quorum provided above is not present at any executive committee meeting, then only statutory business (called for by the TEC) may be transacted at a meeting.
- b. Statutory Business – At SREC, County or District Executive Committee meetings, a quorum for conduct of statutory business (called for by the TEC) shall consist of those members present.

## **GENERAL RULES FOR ALL CONVENTIONS**

### **Rule No. 10 – Supplementary Convention Rules**

- a. Any convention may adopt temporary or permanent rules which supplement these Rules, as long as such supplemental rules do not conflict herewith.
- b. Any convention committee may adopt supplemental rules related to its proceedings provided that such rules do not conflict with these rules or any supplemental rules adopted by the convention.

### **Rule No. 11 – Convention Officials Listed – Challenge**

- a. Convention Officials – The officers of any convention, whether it be in temporary or permanent organization, shall consist of a Chairman, a Secretary, a Sergeant-at-Arms, and such other officers as the Chairman may deem necessary. The Secretary and the Sergeant-at-Arms shall have the power to appoint assistants. The permanent officers, except parliamentarian, shall be elected or appointed from among the convention delegates.
- b. Challenge – Any officer or committee chairman of any convention, whether it be in temporary or permanent organization, who intentionally violates the Rules of the Republican Party of Texas or the directives of the TEC, shall be subject to a challenge filed under the provisions of Rule No. 27; and if such challenge is upheld by the Convention which hears the challenge, that officer or committee chairman shall be removed from serving as a delegate to any convention of the Party at any level for the rest of the year.

### **Rule No. 12 – Resolutions Authorized – No Unit Rule**

Any convention may express its sense on an issue by adopting a resolution on that issue; however, the use of the unit rule (whereby the entire delegation votes as a unit not recognizing the minority votes within the delegation) or the practice of giving binding instructions to the delegates shall not be permitted at any level of the convention process.

### **Rule No. 13 – Convention Quorum – Adjournment**

- a. Precinct Convention – There shall be no quorum to convene or continue a Precinct Convention.
- b. County or Senatorial District Convention – A quorum to convene a County or Senatorial District Convention shall consist of a majority of the delegates registered as attending. Thereafter, a quorum shall be considered present as long as:
  1. The number of votes represented by delegates in attendance comprises more than fifty percent (50%) of the total voting strength of the Convention;
  2. A majority of the seated precincts are present; and
  3. One-third (1/3) of the seated delegates are present.
- c. State Convention – A quorum to convene the State Convention shall consist of a majority of the delegates registered as attending. Thereafter, a quorum shall be considered present as long as:
  1. The number of votes represented by delegates in attendance comprises more than fifty percent (50%) of the total voting strength of the Convention;
  2. A majority of the seated districts are present; and

- 3. One-third (1/3) of the seated delegates are present.
- d. Adjournment – In order to adjourn a convention for lack of a quorum, the Chair shall verify the absence of a quorum, using the aforementioned criteria, and such verification shall be made part of the convention minutes.
- e. No quorum shall be required for consideration of the report of a nominations committee or for the election of delegates and alternates.
- f. A convention by majority vote may adopt rules to utilize an electronic system for determining which delegates and alternates are present.

**Rule No. 14 – Open Meeting and Right to Testify**

- a. All meetings of any convention, committee, or subcommittee, whether it be in temporary or permanent organization, shall be open to any delegate or alternate to that convention, any State or County Republican Party Officer, any elected Republican Public Officeholder, or any Republican Candidate. All the foregoing shall have the right to record or livestream the proceedings with digital devices, except the proceedings of any Nominations Committee. These same people shall have the right to appear before any convention committee or subcommittee and make recommendations for the committee's consideration or testify concerning any item under purview of the committee. The committee may adopt reasonable rules including time limits for such presentations and may establish a reasonable limit of time for these presentations. This privilege shall include delegates and alternates under challenge at any convention pursuant to Rule No. 35. Nothing in this Rule shall be construed as to prohibit individual committee members, whether they be in temporary or permanent organization, from communicating with one another about business to come before their committee, in any manner they choose, prior to the convening of their first committee meeting or at any other time outside of their official committee meeting or meetings. Notice of any meetings of any temporary committee or subcommittee of any County or Senatorial District Convention shall be posted on the preferred digital platform(s), if any, as decided by the CEC, at least twenty-four (24) hours prior to the date of the meeting. If the notice is not posted as prescribed, the committee can only convene on the day of the convention. No executive session shall be held by any convention, convention committee, or convention subcommittee.
- b. An official video recording or livestream may be made of all general sessions and any meetings of any committee of the State Convention, whether it be in temporary or permanent organization.

**Rule No. 15 – Identification Required**

Any persons present at any convention must identify themselves when requested to do so by any Sergeant-at-Arms or any other officer of the convention.

**Rule No. 15A – Distribution of Literature**

Literature may be freely distributed in any State or County/Senatorial District Convention or Caucus, provided that the items being distributed display the name of the person or organization that paid for the literature. Any such literature distributed without the name of the person or organization that paid for the literature shall be removed.

**Rule No. 16 – Previous Question**

- a. Previous Question – At any convention, when the previous question has been moved and seconded and is sustained by a majority vote, the question shall be deemed to have been called and a vote shall occur upon the pending question, except as provided in Section b of this Rule.
- b. Exception – At any convention, a motion to move the previous question or to close nomination concerning any election, including the election of delegates and alternates, shall not be in order until there has been reasonable opportunity for additional nominations, debate and/or amendment.
- c. State Convention Committees – Any State Convention committee or subcommittee may by a two-thirds (2/3) vote adopt a rule allowing the motion for the previous question.

**Rule No. 17 – Debate**

- a. Main Motions – No delegate shall speak more than five (5) minutes on a main motion without the general consent of the Convention, nor shall a delegate speak more than once on the same motion without general consent.
- b. Amendments and Secondary Motions – No delegate shall speak more than three (3) minutes on any amendment or debatable motion subsequently made while a main motion is pending without the general consent of the Convention; nor shall a delegate speak more than once on the same motion without general consent.
- c. Committee Reports – The delegate making the committee report and the delegate making the minority report of any convention committee may speak on such report for up to ten (10) minutes, and may then answer legitimate questions asked by any delegate relating to such report.
- d. Limiting Debate – Any Convention, by majority vote, may limit or extend equally the time and the number of speakers for each side of a debatable motion.

**Rule No. 18 – Voting Strength – Number of Delegates**

The Convention will continue to enjoy its full strength in the cases of preceding Conventions not electing all delegates to which it is entitled. No Convention shall elect fractional delegates; i.e. no Convention shall elect more delegates or alternates than the number to which it is entitled.

**Rule No. 18A – No Amendments after Adjournment**

The minutes of any precinct, county, or senatorial district convention may not be amended to add any delegate or alternate, or strike any elected delegate or alternate after adjournment of that convention.

## **GENERAL RULES FOR PRECINCT CONVENTIONS**

### **Rule No. 19 – Date, Time and Place for Precinct Conventions (Permanent State Executive Committee Rule)**

On or after the first Tuesday in March, for each even numbered year, Precinct Conventions shall be held for each precinct at the date, time and place designated by the County Executive Committee or, in its failure to act, the County Chairman; provided that the place of such convention shall be large enough to accommodate the expected number of participants and must meet the same requirements for access by the elderly and persons with physical disabilities as a polling place.

### **Rule No. 20 – Qualifications for Participation**

The only qualifications for participation in a Precinct Convention, being an officer of such convention or being elected a delegate to the County, Senatorial District, or State Conventions shall be that the person must be a registered voter of that precinct or a resident of that precinct who is eligible to vote a limited ballot and shall have established Party affiliation. Party affiliation may be established by voting in the Republican General Primary or by other means as prescribed by law, provided the person has not been disqualified under this Rule or Rule No. 11. A person who wishes to serve as a delegate or alternate must have fulfilled the requirement of Party affiliation at the time of election. For the purposes of participation in a convention, a person's residence as indicated by their current voter registration certificate or electronic records provided by their county voter registrar, is determinative. A person's residence for the purpose of conventions in a particular year is fixed as of the date of the General Primary Election, even if the person subsequently moves to a different precinct or district. A Precinct Chairman, or person acting in the absence of the Precinct Chairman, who convenes the Precinct Convention earlier than the hour determined by the county executive committee shall be subject to challenge by any Republican General Primary voter in the precinct through the method outlined in Rule No. 27; and if the challenge is upheld by the County or Senatorial District Convention, such person shall be removed from serving as a delegate or alternate to any convention at any level throughout the remainder of the year. Children whose parents or guardians are participants in a Precinct Convention may attend the convention if space permits, but may not participate or disrupt. If there was no Convention held at the Precinct, Senatorial District, or County level, no Delegates or Alternates are qualified to participate in the next higher level convention from that Precinct, Senatorial District, or County.

### **Rule No. 21 – Agenda for Precinct Conventions**

The agenda for each Precinct Convention shall include the following order of business:

- a. Call to order at the appointed hour by the Precinct Chairman or other participant if the Precinct Chairman is not present.
- b. Preparation of a list of and announcement of number of qualified participants present.
- c. Announcement of agenda and basic rules of procedure.
- d. Election of the permanent officers of the convention by majority vote.
- e. Announcement of County or District Convention and of temporary committee meetings, if known.
- f. Election of delegates and alternates to County or Senatorial District Convention, as the case may be, by majority vote, and certification of eligibility of each delegate and alternate by the Precinct Convention Secretary, where the primary voters list is available.

- g. Resolutions.
- h. Other business.
- i. Adjourn.

**Rule No. 22 – Chairman’s Responsibilities**

- a. Written or Electronic Records – The Permanent Chairman of the Precinct Convention shall be responsible for seeing that an accurate written or electronic record is prepared of all convention proceedings, including:
  - 1. The minutes of the Precinct Convention.
  - 2. The list of participants and their residence addresses and towns.
  - 3. The list of delegates and alternates elected to the County or Senatorial District Convention with residence addresses and towns.
  - 4. All resolutions, adopted or not adopted.
- b. Inspection of Records – The written record shall be signed by the Permanent Chairman of the Precinct Convention and made available for inspection and additional copying by any participant in the convention for a period of thirty (30) minutes immediately following adjournment of the convention. Upon request, the Permanent Chairman shall certify any correct copy with his or her signature.
- c. Transmittal of Records – The Permanent Chairman of the Precinct Convention shall safely transmit to the County Chairman the written or electronic record of all convention proceedings, and one (1) copy of the same. Transmittal may be:
  - 1. Electronic, delivered to the County Chairman’s electronic mail address or other website designated by the County Chairman for this purpose, not later than the third (3rd) day after the date of the Precinct Convention if not held on the same day or day immediately preceding the County or Senatorial District Convention. If the Precinct Convention is held on the same day or the day immediately preceding the County or Senatorial District Convention, the Permanent Chairman shall deliver the record not later than thirty (30) minutes prior to the start of the County Convention.
  - 2. By mail, deposited in the mail not later than the second (2nd) day after the date of the Precinct Convention if not held on the same day or day immediately preceding the County or Senatorial District Convention, or
  - 3. In person, delivered not later than the third (3rd) day after the date of the Precinct Convention if not held on the same day or day immediately preceding the County or Senatorial District Convention. If the Precinct Convention is held on the same day or the day immediately preceding the County or Senatorial District Convention, the Permanent Chairman shall deliver the record not later than thirty (30) minutes prior to the start of the County Convention.

In counties that do not hold Precinct Conventions on the same day of, or the day immediately preceding, the County or Senatorial District Convention, and contain multiple Senatorial Districts, the County Chairman shall deliver the original records of each Precinct Convention to the Temporary Chairmen of the Senatorial District Conventions not later than the sixth (6th) day after the date of the Precinct Convention. The County Chairman shall deliver any records subsequently received from a Precinct Convention within two (2) business days after receipt.

- d. Preservation of Records – The Permanent Chairman of the Precinct Convention shall preserve a copy of the written or electronic record, which is not a public record, until the end of the voting year.

The County Chairman shall preserve a paper or electronic copy of the written records of each Precinct Convention until the end of the voting year. The copies are a public record, and shall be available for inspection. The County Chairman shall schedule a reasonable time and place for review of the records to occur within seven (7) days of receipt of a written request.



# **GENERAL RULES FOR COUNTY, SENATORIAL, DISTRICT AND STATE CONVENTIONS**

## **Rule No. 23 – Convention Resolutions**

- a. At County Conventions or Senatorial District Conventions, all resolutions including those offered by delegates for consideration by the Convention shall be filed with the Secretary of the Convention not later than thirty (30) minutes after the permanent committees are appointed (or elected, if applicable). The Secretary of the Convention shall automatically and without debate cause the resolutions to be referred to the appropriate permanent committee.
- b. At a State Convention, all resolutions including those offered by delegates for consideration by the Convention shall be filed with the Secretary of the Convention not later than thirty (30) minutes prior to the first meetings of the permanent committees. The Secretary of the Convention shall automatically and without debate cause the resolutions to be referred to the appropriate permanent committee.
- c. The Secretary of the Convention, or his or her designee, shall remain available in a publicly announced location easily accessible from the convention floor during the period in which such resolutions can be filed.
- d. All resolutions adopted by the next lower-level convention shall be considered by the committee appropriate to the subject of the next higher-level convention.
- e. A Temporary or Permanent Committee may originate resolutions.

## **Rule No. 23A – Delegate Allocations and Entitlements**

- a. The delegate and alternate entitlements to the County or Senatorial District and State Conventions shall be based on the number of votes cast for the Party's gubernatorial candidate in the most recent gubernatorial general election.
  1. Each Precinct Convention shall be entitled to elect one delegate and one alternate to the County or Senatorial District Convention based on a ratio of one (1) for each twenty-five (25) votes and major fraction thereof within the boundaries of the voting precinct and further shown in more detail on the following table, provided that any Precinct Convention shall be entitled to elect at least one (1) delegate and one (1) alternate:

Votes	Delegates	Alternates
0-37	1	1
38-62	2	2
63-87	3	3
88-112	4	4
113-137	5	5
etc.	etc.	etc.

2. Each County or Senatorial District Convention shall be entitled to elect one (1) delegate and one (1) alternate to the State Convention based on a ratio of one (1) for each 300 votes and major fraction thereof within the boundaries of the County or Senatorial District and further shown in more detail on the following table,

provided that any County or Senatorial District Convention shall be entitled to elect at least two (2) delegates and two (2) alternates:

Votes	Delegates	Alternates
0-750	2	2
751-1050	3	3
1051-1350	4	4
1351-1650	5	5
etc.	etc.	etc.

3. Each Precinct and County or Senatorial District Convention delegate and alternate delegate entitlement to the State Convention shall be increased or decreased proportionately among all delegations to achieve a State Convention potential delegate and alternate delegate roll of no less than 7,500 delegates and 7,500 alternate delegates and no more than 9,000 delegates and 9,000 alternate delegates to the State Convention.
- b. At the option of the local County Executive Committee (in counties containing only one senatorial district), Senatorial District Executive Committee (in a district comprising only a part of a single county), or the precinct chairs of the precincts residing in a particular senatorial district (for a county that is only partly situated in a senatorial district) by a two-thirds (2/3) vote of said committee, held no later than the date specified in the TEC for the required drawing for a place on the general primary ballot, the delegate entitlement may be changed to a ratio of one (1) to forty (40) and major fraction thereof, or any ratio in between one (1) to twenty-five (25) and one (1) to forty (40), for that year only if said committee can justify among their peers that it is impractical due to size or availability of space to use the formula permitting the maximum number.
- c. The delegate and alternate entitlement in a presidential election year for a County or Senatorial District Convention which includes more than one (1) Congressional District shall be apportioned among the Congressional Districts in the same manner they are apportioned to the County or Senatorial Districts, provided that the total delegate and alternate entitlement from the County or Senatorial District does not exceed that provided for in this Rule. If the calculation of delegate and alternate entitlements by Congressional District are different from the calculation of delegate and alternate entitlements by County or Senatorial District, the following guidelines shall be used in adjusting the total delegate/alternate entitlements:
  1. The delegate and alternate totals shall not be greater than the delegate/alternate calculation for the County or Senatorial District except that any Congressional District shall be entitled to elect at least one (1) delegate and one (1) alternate which may cause the delegate/alternate entitlement for a County or Senatorial District to exceed the total entitlement for the County or Senatorial District by the number of delegates and alternates from one (1) or more Congressional Districts with less than enough votes to get an entitlement of greater than one (1) pursuant to Section a of this Rule, in a presidential election year;
  2. Except as provided in Subsection 1 above, if the calculation for delegates and alternates by Congressional District should exceed the number of delegates and alternates by Senatorial District, then the delegate and alternate entitlement to the

- Congressional District shall be reduced beginning with the smallest fraction, then continuing to the next higher fraction until the calculations are equal;
3. If the calculation for delegates and alternates by Senatorial District should exceed the number of delegates and alternates by Congressional District, then the delegate and alternate entitlement to the Congressional District shall be increased beginning with the highest fraction, then continuing to the next lower fraction until the calculations are equal;
  4. In a presidential election year, each delegate and each alternate shall have credentials for both the Senatorial District and the Congressional District Caucuses and if a delegate or alternate is not credentialed for both, the delegate or alternate shall not be credentialed for either.
- d. In the event of boundary changes among precincts or districts, or the creation or deletion of precincts or districts since the most recent gubernatorial election, the following rules shall govern the allocation of gubernatorial votes to the changed or newly created precincts or districts.
1. The apportionment of gubernatorial votes to the newly created or changed precincts or districts shall be made using any fair and equitable method for making such determination.
  2. The County Executive Committee shall apportion to each precinct the number of votes to be used in allocating the number of delegates and alternates which may be elected by such precincts using any fair and equitable method for making the determination.
  3. When the boundaries of a Senatorial District or Congressional District have changed or a new district formed causing a boundary change in an election precinct, the apportionment of gubernatorial votes to each precinct shall be used in allocating the number of delegates to be elected in each affected district.
  4. If the County Executive Committee fails to act before the first (1st) day of candidate filing for a place on the General Primary ballot for public office, the SREC shall make such apportionment of the gubernatorial vote to precincts.
- e. The Permanent Convention Chair of the County Convention or Senatorial District Convention shall send Notice of Election to every Delegate and Alternate to the State Convention. If the Delegate or Alternate provided his or her e-mail address on the Convention roster, Notice of Election may be by e-mail, but if no e-mail was provided the Notice of Election must be mailed to the address on the Delegate or Alternate Exhibit List.

**Rule No. 24 – Minority Reports of Committees**

At any convention other than a Precinct Convention, a minority report of a committee, shall be presented to the Convention, if a committee member has notified the committee chairman of the intent to file a minority report before the committee adjourns, and if it has been reduced to writing and signed by not less than two (2) or twenty percent (20%) of the members of such committee, whichever is greater, and presented to the chairman of the committee or the convention secretary no later than thirty (30) minutes after the committee adjourns. The committee members signing the minority report shall designate the member to present the minority report to the convention and the convention chairman shall permit that member to present the minority report to the convention and that member shall be permitted to move the implementing motion. In a state convention, if a committee chairman has been notified of a potential

minority report before adjournment, and does not remain in the committee room for 30 minutes following adjournment, then the minority report may be presented to the convention secretary during the convention, but before the presentation of the Rules Committee report.

**Rule No. 25 – Persons Admitted and Who May Address**

- a. Admittance – At any convention other than a Precinct Convention, there shall be admitted to the convention floor only delegates whose names are listed on the temporary roll during the temporary organization or on the permanent roll when adopted by the Convention, past State Chairmen and Vice Chairmen, the present members of the SREC, its officers and employees, the National Committeeman and Committeewoman, past National Committeemen and Committeewomen, properly accredited members of the media, babies of nursing mothers who are delegates, Republican public officeholders, Republican candidates for public office, and persons assisting delegates that have physical disabilities.
- b. Badges – The Secretary of the Convention is instructed to issue identification badges in accordance with the above, and the Sergeants-at-Arms shall admit only authorized persons to the convention floor. Seating shall be provided for alternates in the section(s) designated for guests.
- c. Addressing Convention – At any convention other than a Precinct Convention, no person other than a Republican Party of Texas official, member of the SREC, or delegate shall address the Convention or Caucus of the convention without the permission of the Chairman or the general consent of the Convention or Caucus of the convention.
- d. At any convention, registration and credentialing shall continue through adjournment.

**Rule No. 26 – Seating of Alternates at Any Convention Other Than a Precinct Convention**

- a. Order of Seating Alternates – Alternates shall be seated for absent delegates in the order listed in the minutes of the convention electing them; however, if instructions are provided by the Convention electing such alternates, said instructions shall be followed in the seating of alternates.
- b. Voting in Caucuses – Alternates shall be admitted to all district or precinct caucuses; however, they shall not vote or be provided any privileges of a delegate unless seated for an absent delegate.
- c. Limitations on Using Alternates – Alternates shall replace delegates absent from the voting floor only from the same convention electing such alternates.
- d. Timing of Seating – Alternates may be seated to replace absent delegates at any time in a convention by the chairman of a delegation and seated alternates shall relinquish their seat upon the return to the floor by the delegate except that:
  1. Alternates shall be seated to replace delegates absent from the voting floor prior to the beginning of any vote and shall not be seated or unseated during any vote.
  2. In caucuses, alternates shall be seated to replace delegates absent from the voting floor prior to roll call of the caucus or delegation of the caucus and shall not be seated or unseated during the roll call of the caucus or delegation of the caucus.
  3. Alternates under challenge pursuant to Rule No. 27 shall not be seated until the challenge is resolved.

**Rule No. 27 – Challenges to Credentials of Delegates**

- a. County or Senatorial District Conventions – The credentials of any delegate or alternate to a County or Senatorial District Convention may be challenged by any person who voted in the Republican General Primary and who resides in the same precinct as the challenged delegate by mailing to the County or District Convention Chairman a written challenge specifying the grounds for the challenge and detailing the specific Rule or Rules alleged to have been violated. The challenge shall be sent via certified or registered mail at least three (3) days before the date of the convention. A copy of this challenge shall be sent by certified or registered mail by the person initiating the challenge to the challenged delegate(s) or alternate(s). The County or District Convention Chairman shall send all challenges to the chairman of the Temporary Committee on Credentials of the convention in question.
- b. State Convention
  1. Filing of Challenge – The credentials of any delegate or alternate to the State Convention may be challenged by any person who voted in the Republican General Primary and who resides in the same County and Senatorial District as the challenged delegate or alternate by sending to the State Chairman and to each challenged delegate or alternate a written challenge specifying the grounds for the challenge and detailing the specific Rule or Rules alleged to have been violated. A challenge must include the number of the rule alleged to have been violated and the specific facts supporting the challenge based on a violation of that rule. A challenge must also identify any allegations of fact and identify those alleged facts not personally known to the complainant. A challenge should use simple, concise, and direct statements. The challenge shall be sent via certified return receipt or registered mail no later than thirty (30) days following the date of the County or Senatorial District Convention. The State Chairman shall deliver all such challenges to the Officials Committee of the SREC (as constituted in the bylaws of the SREC, Article VII, Section 8). The names of the members of the SREC Officials Committee shall be posted on the website of the Republican Party of Texas.
  2. Officials Committee – Without attempting to assess merit or lack of merit, the Officials Committee shall in open session without taking testimony conduct a preliminary review of each challenge in order to establish whether the basis for the challenge is valid under the Rules of the Republican Party of Texas. Both the person filing a challenge and the delegate or alternate challenged shall be notified of the date and time of the Officials Committee meeting in which the challenge is heard. The Officials Committee shall forward to the Temporary Committee on Credentials all challenges meeting the requirements of Party Rules with regard to form, content, and procedure. Any challenge not meeting these requirements shall not be forwarded to the Temporary Committee on Credentials, and the principal(s) who brought such challenge and the principal(s) against whom the challenge was brought shall be promptly notified by certified return receipt or registered mail. The Credentials Committee shall not hear a late challenge of a delegate or alternate.
  3. Appeal – A decision of the Officials Committee may be appealed by either party to the Temporary Committee on Credentials by mailing notice of appeal via certified

return receipt or registered mail to the Credentials Committee Chairman and to the principal(s) named in the challenge no later than ten (10) days prior to the date that the State Convention holds its first (1st) general session.

- c. Status of Challenged Delegate – No delegate whose credentials are challenged shall lose the eligibility to serve on a temporary committee, although the challenged delegate may not vote in the Credentials Committee on his or her own challenge.
- d. Committee on Credentials Procedure – At any convention other than a Precinct Convention, the Temporary Committee on Credentials, when it convenes, shall hear both sides of the challenge and shall report to the Convention the name of each delegate or alternate it believes to be entitled to participate in the convention. The Convention shall vote on the report of the Committee on Credentials on each challenge that is made. Challenged delegates shall be listed on the Temporary Roll, but may not vote on their own challenge. Furthermore, delegates from delegations that are being challenged may not be seated until the challenge is resolved.

**Rule No. 27A – Date, Time and Place for County and Senatorial District Conventions (Permanent State Executive Committee Rule)**

County and Senatorial District Conventions shall be held on the fourth Saturday in March. However, if that date occurs during Passover or on the day following Good Friday, the conventions shall be held on the next Saturday that does not occur during Passover or is not the day following Good Friday. The County Executive Committee in each county shall set the hour and place for convening County and Senatorial District Conventions in that county.

**Rule No. 28 – Conventions in County with Multiple Senatorial Districts**

If a county is situated in more than one state Senatorial District, instead of a County Convention, a Senatorial District Convention shall be held in each part of the county that is situated in a different Senatorial District, provided, however, that shared facilities may be utilized for separate Senatorial District Conventions that may be held outside the geographical boundaries of the Senatorial District, if party interests and public accessibility will be served as determined by a caucus of precinct chairmen in each affected Senatorial District within the county no later than the date on which drawing for a position on the primary ballot is conducted. A meeting for this purpose shall have been called by written notice to each precinct chairman in each respective Senatorial District within the county from the County Chairman no later than ten (10) days prior to the meeting.

**Rule No. 29 – County or Senatorial District Convention Committees**

- a. As provided by Section 174.065 (a), Texas Election Code, the County Chair is the Temporary Chair of a County Convention. If a Senatorial district is situated in more than one county or the Senatorial District is completely within but does not include the entire county, the temporary chair shall be elected by the caucus of the Senatorial District Executive Committee at a properly called County Executive Meeting. The list of County Executive Committee members that will be caucusing with their SD for selection of Temporary Senatorial District Convention Chair shall be updated within seven (7) business days before this meeting and enforced by the County Sergeant-of-Arms.
- b. Prior to each County or Senatorial District Convention, the Temporary Chairman shall appoint the following committees and name the chairmen and members thereof before the

temporary committees convene, provided that all members shall be delegates, and if the convention has more than fifty (50) delegates each such committee shall be composed of at least five (5) and not more than fifteen (15) delegates. The list of committee members shall be published in a manner accessible to delegates and once published shall not increase in number unless it falls below the minimum in which case it shall be brought back to no more than the minimum. The committees and their duties shall be as follows:

1. Credentials: This committee shall hear any contest concerning delegates and shall recommend the Permanent Roll of the Convention.
  2. Rules: This committee shall recommend the Supplemental Rules for the Convention.
  3. Permanent Organization: This committee shall recommend permanent officers of the convention from among the delegates present.
  4. Resolutions: This committee shall conduct preliminary deliberations for the purpose of making recommendations to the Permanent Resolutions Committee.
  5. Nominations: This committee shall conduct preliminary deliberations for the purpose of making recommendations to the Permanent Nominations Committee.
- c. The Temporary Convention Chairman shall make available at the Chairman's podium, at the start of the convention, no fewer than five (5) copies of the Temporary Rules Committee report and no fewer than five (5) copies of the Temporary Resolutions Committee report, and announce they may be inspected by any delegate or alternate to the convention.
- d. Immediately upon the election of the Permanent Convention Chairman, the permanent committees shall be chosen according to the convention supplementary rules or appointed by the Permanent Convention Chairman if the rules do not specify any method. The committee members shall be from among the delegates, whose duties shall be as stated below, and the chairmen thereof, provided that if the convention has more than twenty-five (25) delegates, each such committee shall be composed of at least five (5) and not more than fifteen (15) delegates. The committees and their duties shall be as follows:
1. Nominations: This committee shall present nominations for delegates and alternates to the State Convention, after considering the recommendations of the Temporary Nominations Committee.
  2. Resolutions: This committee shall recommend resolutions to the Convention, after considering the recommendations of the Temporary Resolutions Committee.

### **Rule No. 30 – County or Senatorial District Convention Agenda**

The agenda for each County or Senatorial District Convention shall include the following order of business.

- a. Call to order by the Temporary Chairman.
- b. Roll call of temporary roll of delegates. (Roll call may be taken by name or by Precinct Delegation count. The delegate registration list may be used at the start of the convention to establish the temporary roll and a quorum for the convention, when approved by a majority voice vote of the delegates present. Delegates must provide proper identification upon registration to obtain their credentials, if this method is to be used.) At the conclusion of roll call the Secretary shall announce:
  1. the number of delegations present;

- 2. the combined voting strength of those delegations; and
- 3. the number of attending delegates at the start of convention.
- c. Report of the Credentials Committee (this report shall be acted on prior to any further business).
- d. Report of the Rules Committee; adoption of supplemental rules.
- e. Report of the Permanent Organization Committee; election of permanent officers from among the delegates.
- f. Appointment of (or election, if applicable) Permanent Nominations and Permanent Resolutions Committees.
- g. Precinct Caucuses, if applicable.
- h. Report of the Resolutions Committee; adoption of the report.
- i. Report of the Nominations Committee; adoption of the report.
- j. Other business.
- k. Adjourn.

Provided, however, that such order of business, following item (c) may be changed by affirmative vote of a majority of the delegates present and voting.

### **Rule No. 31 – Report of Nominations Committee**

At a County or Senatorial District Convention, the Committee on Nominations shall present a report including a list of delegates and alternates for election to the State Convention. The manner in which alternates shall replace absent delegates may be adopted in the supplemental convention rules, or if none are adopted shall be designated by the Nominations Committee report. That report may be amended by the Convention by the process of adding, or by striking and inserting, or by substitution. Supplemental rules regarding the manner in which alternates shall replace absent delegates can be amended by simple majority vote. The Convention shall then elect the delegates and alternates to the State Convention by adopting the report, or the report as amended, of the Nominations Committee. The Convention may provide in its supplemental rules a method for nominating some or all delegates and alternates in precinct caucuses of the Convention. Delegates and alternates nominated by precinct caucuses shall be reported to the Committee on Nominations to include in their report, and unless provided otherwise in the Convention supplemental rules, these nominations shall not be subject to amendment by the Committee, except to move an alternate to a delegate. In the absence of provisions for nomination of some or all delegates or alternates in precinct caucuses in the supplemental rules, all delegates and alternates will be elected at large.

### **Rule No. 32 – Certified List of Delegates**

Delegates and alternates to the Republican State Convention shall be made aware, at the time they submit their names, that any contact information provided may be disclosed in accordance with the following:

- a. The Permanent Chairman of a County or Senatorial District Convention shall be responsible for making a certified list of the delegates and alternates chosen, with residence addresses including towns shown thereon, phone number (if available), and email address (if available), together with a copy of all resolutions adopted by the Convention, and shall sign the same, the Permanent Secretary of such convention attesting the signature of the Permanent Chairman; and within five (5) days after the convention shall forward such certified lists and resolutions to the State Chairman at the Republican Party of Texas State Headquarters. The SREC may specify a standard format and method of submission for the



lists, resolutions, and other records. The lists, resolutions and other records of the convention, only to the extent required by law, shall be made available by the Permanent Chairman for inspection and copying during office hours, at a charge not to exceed \$1.00 per page, or by electronic means when such method is available at a charge not to exceed \$10.00.

- b. All Republican Party of Texas party officeholders, candidates for party office, State Convention Caucus Chairs, Committee Chairs, and State Convention temporary caucus chairs shall be given a list of delegates and alternates, who have positively affirmed that they wish to share information with the Republican Party of Texas with all contact information for their political subdivision from the Republican Party of Texas as soon as they are available.
- c. Any compilation of delegate and alternate information prepared by the Republican Party of Texas shall not be treated as a public record. However, subject to appropriate proprietary agreements, said compilation shall be made available to any then current delegate or alternate of the Republican State Convention or any Republican officeholder or candidate for Party or public office or Party County Chairman at a charge not to exceed \$25.00 per 1,000 delegates and alternates provided. Said information and its updates shall be made available at the earliest practical date and initially no later than five (5) weeks from the date of the last County or Senatorial District Convention. Said information, once available, shall be provided to a qualified requestor within no more than seven (7) business days of the receipt by the Republican Party of Texas State Headquarters of the order form and payment.

**GENERAL RULES FOR STATE CONVENTIONS****Rule No. 33 – Temporary Organization**

- a. Date, Time, Place and Call. The SREC shall select the date, time and place of the State Convention, and the State Chairman shall include this information along with the date and place of temporary committee meetings in the call to the convention, which shall be posted on the website of the Republican Party of Texas (<http://www.texasgop.org>) at least thirty (30) days prior to the Convention. The State Chairman shall send the call via electronic mail twenty-five (25) days prior to the convention to each delegate and alternate on the temporary roll who has a valid email address on file with the Republican Party of Texas. All delegates and alternates who do not have a valid email address on file shall be mailed a copy of the call not less than fifteen (15) days prior to the convention. The State Chairman shall recommend the temporary convention agenda and order of business to the SREC.
- b. Temporary Committees. Within twenty (20) days following the County/Senatorial District Conventions, the two (2) SREC members representing each Senatorial District, either separately or jointly, shall recommend to the State Chairman one (1) representative from among their district's delegates to each of the State Convention temporary committees. The State Chairman shall appoint one (1) delegate from each Senatorial District to each of these committees from among these recommendations timely submitted, or of the State Chairman's own choosing if no names were submitted, or none were eligible or willing to serve. In addition to these members, the State Chairman shall appoint the Chairman for each temporary committee. These lists of members and Chairmen, including contact information, shall be posted on the Republican Party of Texas' website within thirty (30) days following the County or Senatorial District Conventions. The lists will be updated as new or corrected information is obtained. The temporary committees are:
  1. Credentials: This committee shall hear any contests concerning delegates and alternates which were not filed as challenges and shall recommend the resolution of such contests, plus the temporary roll about which there is no contest, to the SREC. Additionally, this committee shall hear all challenges forwarded to it by the State Officials Committee, plus any challenge under appeal, and shall recommend the resolution thereof to the State Convention. Upon resolution by the State Convention of any challenges under this appeal process, this committee shall recommend the permanent roll to the State Convention.
  2. Organization: This committee shall recommend the temporary organization of the convention to the SREC. The State Chairman shall be the Temporary Chairman of the biennial State Convention. The officers of each State Convention shall include a registered parliamentarian appointed by the State Chairman. This committee shall also recommend the permanent organization to the State Convention after the State Convention's adoption of the permanent roll. The election of a permanent convention chairman shall not be in order until a majority of those delegates elected at County or Senatorial District Conventions have registered in attendance at the State Convention. For the purposes of this section, alternates seated as delegates shall be counted as delegates.

3. Rules: This committee shall recommend the Supplementary Rules for the Convention to the SREC and may recommend changes in these General Rules to the Permanent Committee on Rules.
  4. Legislative Priorities: This committee shall conduct the preliminary deliberations for the purpose of making recommendations to the Permanent Committee on Legislative Priorities.
  5. Platform and Resolutions: This committee shall conduct the preliminary deliberations for the purpose of making recommendations to the Permanent Committee on the Platform and Resolutions. The Platform and Resolutions Committee shall begin deliberations preparing the platform of the state convention by starting with the most recent state convention platform. The Committee shall review submitted resolutions and platform planks sent from the various County and Senatorial District Conventions to eliminate duplicates, consolidate similarly worded submissions, and check for existing planks of a substantially similar nature. The Committee shall only construct or diminish the previous platform through plank by plank votes. The report to the Permanent Platform Committee shall clearly make visible all insertions, modifications, and deletions.
- c. SREC Pre-convention Meeting. Prior to the convention, the SREC shall approve the following:
1. The Temporary Roll of the Convention, excluding those challenges, if any, to be resolved by the Convention as provided in Rule No. 27.
  2. The temporary Supplemental Rules of the Convention, which together with these General Rules shall be the Temporary Rules of the Convention.
  3. The temporary agenda and order of business of the convention.
  4. The temporary organization of the convention.
- d. Temporary Caucus Chairmen. Prior to each State Convention in Presidential election years the State Chairman shall appoint the Temporary Chairman of each Congressional District Caucus. Prior to each State Convention, the two (2) members from each Senatorial District of the SREC shall appoint one (1) representative from among their Senatorial District's delegates to be the Temporary Chairman in each Senatorial District Caucus; provided, however, that if requested in writing by Senatorial District Convention resolution, the State Chairman shall appoint the Permanent Chairman of the last Senatorial District Convention for those Senatorial Districts which lie solely within one (1) county, unless the Permanent Chairman is unable or unwilling to serve. If the two (2) SREC members cannot agree on a selection, then each shall submit a name to the State Chairman, who will select one (1) of the names submitted. If any appointed delegate is unable to serve, the State Chairman may appoint a replacement.

**Rule No. 34 – Permanent Committees and Composition**

At each biennial State Convention, the membership of each permanent committee listed below shall be composed of one (1) delegate from each Senatorial District, to be elected by caucus of the delegates in each such district, plus the Chairman thereof, to be appointed by the State Chairman. If there is a temporary committee specified in these Rules corresponding to a permanent committee in this Rule, the scope of the permanent committee is not limited to what was considered by, voted upon, or recommended by the temporary committee counterpart. Such permanent committees shall be as follows:

- a. Credentials: This committee shall continue to add registered delegates and alternates to the permanent roll throughout the convention.
- b. Rules and Order of Business: This committee shall recommend to the Convention the Supplementary Rules of the Convention, any amendments to these General Rules, and the Order of Business.
- c. Legislative Priorities: This committee shall recommend to the Convention proposed legislative priorities and related resolutions. The Legislative Priorities Committee of the biennial State Convention shall prepare a list of no more than fifteen (15) resolutions defining legislative priorities for the Republican Party of Texas State Convention to consider for the session of the Texas Legislature following the Convention. The State Convention will vote “Yes”, “No”, or “Abstain” for each of the fifteen (15). The top half, rounded up, shall become the Republican Party of Texas legislative priorities for the session of the Texas Legislature following the Convention. Legislative priorities shall be for specific changes, additions to or deletions from the law that directly support the Platform and the core values of the Republican Party of Texas. The SREC shall expend reasonable Party resources to promote passage of legislation crafted in support of these priorities.
- d. Platform and Resolutions: This committee shall recommend to the Convention the platform and resolutions.
- e. State Nominations: This committee shall report to the Convention nominations for the state positions to be filled by the Convention.
- f. State Grammar, Spelling, Formatting, and Punctuation Committee: The Permanent Convention Chair shall appoint a Grammar, Spelling, Formatting, and Punctuation Committee of qualified delegates who shall meet during the consideration of the Reports on the floor of the Convention for the purpose of reviewing non-substantive grammar, spelling, formatting, and punctuation of the language included in the Reports and shall incorporate the necessary corrections. Upon completion of their work, the committee will report back to the chair with their revisions for vote by the convention.

**Rule No. 34A – National Nominations Committee**

At the biennial State Convention in presidential election years, there shall also be a Permanent National Nominations Committee composed of one (1) delegate from each Congressional District, to be elected by caucus of the delegates in each such district, plus the chairman thereof, to be appointed by the State Chairman. The Chairman of the Permanent National Nominations Committee shall convene the meeting of the committee two (2) hours after the start of the Congressional Caucus with a quorum being present. This committee shall report to the Convention nominations for National Delegates and Alternates, Presidential Electors, and National Committeeman and National Committeewoman, which nominations have previously been made in accordance with Rule Nos. 39 and 40, and Sections 6 and 7 of Rule No. 38.

**Rule No. 35 – Temporary Committee on Credentials – Contest**

At a State Convention, any delegate or alternate who has filed a challenge or who has been challenged including delegates and alternates whose names are not listed on the Temporary Roll of the Convention, but are listed on County or Senatorial District Convention Minutes and Returns filed with the State Chairman shall be allowed admittance to the room in which the Temporary Committee on Credentials holds its meetings for the purpose of presenting a contest and may speak to the merits of their case within

the time limits established by the committee. The contestants from only one (1) County or Senatorial District shall be admitted at one (1) time. Any contest will be reported by the Credentials Committee to the SREC, with a recommendation as to its resolution, and the decision of the SREC will be final in determining its effect on the Temporary Roll of the Convention. If the contest is filed as a challenge, in accordance with provisions of Rule No. 27, the issue will be presented by the Credentials Committee with a recommendation for its resolution, to the full Convention for final determination.

**Rule No. 36 – Seating and Voting**

Seating and voting at the biennial State Convention shall be by Congressional District or Senatorial District as appropriate.

**Rule No. 37 – State Convention Exhibition Hall**

Applications for booths and displays at the Exhibition Hall venue at the State Republican Convention shall be reviewed for approval by the SREC Officials Committee in accordance with the Preamble and Principles of the Platform. The denial of an application may be appealed by the applicant and the approval may be appealed by a member of the Officials Committee to the full body of the SREC which shall consider the application at their next meeting. A two-thirds (2/3) vote of the SREC shall be required to deny or approve the appeal of the application. The ruling of the SREC Officials Committee shall be final if there is no scheduled meeting before the State Republican Convention. All such votes of appeals shall be by roll call vote.

**Rule No. 38 – National Convention Delegates and Alternates***Section 1. Presidential Primary, Application of Rule*

- a. Presidential Primary: A Presidential Primary election shall be conducted by the Republican Party in the year 1980 and every fourth year thereafter in conjunction with the Party's General Primary Election for the purpose of permitting the qualified voters of Texas to express their respective preferences as to the nominee of the Republican Party to the office of President of the United States.
- b. Application of Rule: Such Presidential Primary shall be held, and the delegates and alternates to the National Convention for that year shall be selected and elected, in the manner and at the times set forth in this Rule.

*Section 2. Method of Qualifying as Presidential Candidate*

- a. Filing: Any person eligible to hold the office of President of the United States may qualify to participate as a Presidential candidate in the presidential primary by filing with the State Chairman, not later than the date and time specified for the General Primary Election ballot filing deadline in Section 172.023(a), TEC, a signed and acknowledged application for his or her name to be placed on the Presidential Primary ballot, accompanied by a supporting petition signed by a minimum of 300 registered voters of the state from each of a minimum of fifteen (15) Congressional Districts, or the payment of a filing fee of \$5,000.
- b. Signing Petition: A voter may sign only one (1) petition supporting one (1) candidate for President and may sign that petition only one (1) time. The name of any voter violating this provision shall be stricken from all petitions signed by that voter and shall not be counted for any purpose.

- c. Form of Petition: The SREC shall prescribe the form of all applications and petitions which are to be filed pursuant to this section and may by resolution provide for a method of verification of the petitions required here.
- d. Withdrawal or Death of Candidate: A Presidential candidate may withdraw from participation in the Presidential Primary at any time by filing with the Secretary of the SREC a signed and acknowledged request to that effect. If a Presidential candidate dies or withdraws before the seventy-ninth (79th) day prior to Election Day, the name of the candidate shall not appear on the ballot. If a candidate dies or withdraws during the seventy-nine (79) days before Primary Election Day, the votes cast for that candidate shall be counted and the delegate and alternates, if any, allocable to that candidate under this Rule shall be elected by the appropriate Congressional District Caucus from any qualified persons and they shall be uncommitted delegates and alternates.
- e. Replacement of Delegates of Withdrawn or Deceased Candidate: If a Presidential candidate withdraws or dies during the time between Primary Election Day and the convening of the State Convention, then any delegates and alternates to which such Presidential candidate would otherwise be entitled under this Rule shall lapse and the appropriate Congressional District Caucuses at the State Convention shall elect qualified delegates and alternates as uncommitted delegates and alternates in replacement of the delegates and alternates of such withdrawn or deceased candidate. For the purpose of this section, withdrawal shall be accomplished only by the candidate filing a signed and acknowledged request to that effect with the Secretary of the SREC.

Challenge to Petition: In the event of a challenge to a petition, the State Chairman shall follow the procedure for verification of signatures by means of statistical sampling as provided in Section 141.069 of the TEC.

### *Section 3. The Presidential Primary Ballot*

- a. Listing on Ballot: The names of the qualifying Presidential candidates shall be printed on the ballot as a separate race (and as the first race if not prohibited by law) on the Party's Official Ballot for the General Primary. The names of the candidates shall be listed in a vertical column under the heading "Preference for Presidential Nominee." The order of appearance on the ballot in each county shall be determined by lot in each county at a meeting of the County Executive Committee in accordance with Section 172.082, TEC.
- b. Uncommitted: In addition to the ballot listing of the names of the qualifying Presidential candidates, there shall appear at the bottom of such listing of candidates on said ballot a place designated "Uncommitted" in accordance with Section 4 of this Rule.
- c. Adjustment of Ballot for Various Methods of Voting: Appropriate changes shall be made in ballots for voting machines and electronic voting systems; consistent with the method of voting used.
- d. Style of Names: The type for all names of qualifying Presidential candidates shall be uniform and of the same size and the SREC shall prescribe a sample ballot and the State Chairman shall furnish a copy of the sample ballot to each County Chairman at the time prescribed by the TEC for certifying the names to appear on the ballot.
- e. Write-in Prohibited: Write-in voting for presidential candidates shall not be permitted, and any write-in votes shall not be counted for any purpose.

*Section 4. Uncommitted Delegates and Alternates*

In addition to the foregoing, uncommitted delegates and alternates may be elected as follows:

- a. District Delegates: In those Congressional Districts entitled to uncommitted delegates and alternates under this Rule, the Congressional District Caucus convened at the State Convention shall elect and submit to the Convention for confirmation, in like manner with other delegates and alternates, the name(s) and appropriate number of qualified voters who reside in the district and who voted in the Republican Presidential Primary and who sign a pledge declaring themselves uncommitted at the time of their election as uncommitted district delegates and alternates to the National Convention, and such persons shall be confirmed by the Convention as uncommitted district delegates and alternates.
- b. Delegate Entitlement: For the purpose of determining entitlements under Sections 8 and 9 of this Rule, votes cast for “Uncommitted” on the ballot shall be considered as having been voted for a separate candidate.
- c. At-Large Delegates: In the event a canvass of the Republican Presidential Primary vote on a statewide basis demonstrates that the voters are entitled to one or more uncommitted delegates and alternates at-large under this Rule, the National Nominations Committee, as provided for under Rule No. 34A, shall nominate and include in its report to the Convention under Section 7, Subsection c, the appropriate number of qualified voters of the State who voted in the Republican Presidential Primary and who sign a pledge declaring themselves uncommitted at the time of their election, as at-large and uncommitted delegates and alternates to the National Convention.

*Section 5. Canvass of Returns*

For the purpose of selecting district delegates and alternates, the returns of votes cast for Presidential candidates in the Republican Presidential Primary shall be canvassed by the SREC at the same time as the returns for other offices and shall be canvassed and recorded by Congressional District. For the purpose of selecting at-large delegates and alternates, the returns shall be canvassed and counted on a statewide basis.

*Section 6. Election of District Delegates and Alternates at State Convention*

- a. Number of District Delegates and Alternates: Three (3) district delegates from each Congressional District and three (3) alternates shall be elected at the State Convention required by Section 174.092, TEC, in accordance with this section and the entitlements set forth in Sections 8 and 9 hereof.
- b. At the State Convention, each Congressional District shall meet and shall elect those district delegates and alternates to which a candidate is entitled under Section 8. Elections for a candidate’s committed delegates and alternates shall be from persons nominated from the floor at the said meeting, provided however, that said nominees agree to adhere to the pledge to the candidate required under Section 10 hereof. Nominations for uncommitted delegates, if there is such an entitlement, shall be provided under Section 4. Elections shall be by majority vote, one at a time, with all delegates being elected first and then all alternates. Those delegates and alternates elected by the Congressional District shall be submitted to the Convention, which shall confirm, and not amend, those district delegates and alternates who shall be the district delegates and alternates from Texas to the National Convention of the Republican Party, and shall be so certified in accordance with The Rules of the Republican Party.

*Section 7. Election of At-Large Delegates and Alternates at State Convention*

- a. As provided for in Rule No. 34A, each Congressional District Caucus shall meet at the State Convention, and elect one (1) person to serve as a member of the National Nominations Committee from persons nominated from the floor at the said meeting. Election to this committee shall be by majority vote. In the same manner, each Congressional District Caucus may recommend the name of one (1) member for consideration by the National Nominations Committee as a National Convention delegate or alternate, but the National Nominations Committee is not required to accept such recommendation, in accordance with The Rules of the Republican Party.
- b. At the State Convention, the National Nominations Committee shall meet to select nominees for all at-large delegates and alternate delegates, and consider the recommended names of members of the Congressional District Caucuses for possible selection as National Convention Delegates and Alternates. Those elected federal office holders who have access to the floor of the National Convention by virtue of their office shall be prohibited for selection as an at-large national delegate or alternate, by the National Nominations Committee.
- c. Those at-large delegate and alternate nominees selected by the National Nominations committee shall be reported to the State Convention. This report shall not be amendable by the State Convention, but shall either be confirmed or rejected by the State Convention. If the report is rejected, it shall be immediately returned to the Committee for revision and then resubmitted to the State Convention, until the report is confirmed by the Convention. The at-large delegates and alternates shall also be bound by the pledge provisions of Section 10 of this Rule. At-large delegates and alternates nominated and elected from Texas in accordance with this Rule shall be certified as the delegates and alternates from Texas in accordance with The Rules of the Republican Party for the National Convention.

*Section 8. District Delegate and Alternate Entitlements*

For the purpose of determining the entitlement to district delegates and alternates by candidates, the provisions of this section shall apply as follows:

- a. **More than Fifty Percent (50%) of Vote Received by Candidate:** A candidate receiving more than fifty percent (50%) of the votes in any Congressional District shall be entitled to three (3) delegates and alternates from that Congressional District.
- b. **No Candidate Receives Majority of Vote:** If no candidate receives a majority of the votes in any Congressional District the plurality winner is entitled to two (2) delegates and alternates from that district and the candidate receiving the next highest number of votes receives one (1) delegate and alternate; provided, however, that if no candidate receives a majority vote in a Congressional District, and only one (1) candidate receives more than 20% of the Congressional District vote, such candidate shall be entitled to two (2) delegates and alternates. The remaining Congressional District delegate and alternate shall be awarded to the second (2nd) place candidate.
- c. **No Candidate Receives Twenty Percent (20%) of Vote:** If no candidate receives more than twenty percent (20%), each of the three (3) candidates receiving the highest number of votes shall receive one (1) delegate and alternate.



*Section 9. At-Large Delegate and Alternate Entitlements*

For the purpose of determining the entitlement to at-large delegates and alternates by candidates, the provisions of this section shall apply, as follows:

- a. **At-Large Delegates and Alternates Allocated by State Convention Caucus:** The delegates elected to participate in the State Convention shall caucus by secret ballot and select a presidential candidate by plurality vote to receive the entitlement of a number of at-large delegates and alternates that will represent twenty-five percent (25%) (rounded down) of the total number of Texas delegates and alternates to the Republican National Convention. The State Republican Executive Committee shall prescribe the process for each state convention delegate to cast their vote for their presidential preference by electronic or paper ballot. The National Nominations Committee shall canvass the vote and allocate the State Convention Caucus selection from among the at-large delegates prior to allocating the remaining at-large delegates as follows:
- b. **At-Large Delegates and Alternates Allocated by Presidential Primary:**
  1. **More than Fifty Percent (50%) of Vote Received by Candidate:** A candidate receiving more than fifty percent (50%) of the votes cast in the Presidential Primary canvassed on a statewide basis shall be entitled to all remaining at-large delegates and alternates allocated to Texas under The Rules of the Republican Party.
  2. **No Candidate Receives Majority of Vote:** If no candidate receives a majority of the votes cast statewide in the Presidential Primary, then the remaining at-large delegates and alternates shall be apportioned among the candidates receiving more than twenty percent (20%) of the statewide vote in the ratio which the number of votes received by each such candidate who received more than twenty percent (20%) of the statewide vote, bears to the total of all such candidates receiving more than twenty percent (20%) of the statewide vote, rounding fractional delegates and alternates upward to the next whole number beginning with the candidate receiving the largest number of votes. However, if no candidate receives a majority of the votes cast statewide in the Presidential Primary and only one candidate receives twenty percent (20%) or more of the statewide vote, then the remaining at-large delegates and alternates shall be apportioned between the candidate receiving more than twenty percent (20%) of the statewide vote and the candidate receiving the second highest number of votes, in the ratio which the number of votes received by each such candidate bears to the total votes for both such candidates, rounding fractional delegates and alternates upward to the next whole number beginning with the candidate receiving the largest number of votes.
  3. **No Candidate Receives Twenty Percent (20%) of Vote:** If no candidate receives more than twenty percent (20%) of the votes cast statewide in the Presidential Primary, the remaining at-large delegates and alternates shall be apportioned among all candidates, beginning with the candidate receiving the highest number of votes and rounding fractional delegates and alternates upward to the next whole number, and then awarding delegates and alternates to the second highest candidate in the same manner, and so forth until the remaining at-large delegates and alternates to be apportioned have been fully awarded.
- c. If, pursuant to Rules of the Republican Party Rule 17, either the chairman of the Republican National Committee or the Republican National Committee Standing

Committee on Rules, determines that subsection (a) of this Section is in violation of the Rules of the Republican Party, all At-Large Delegates and Alternates will be allocated in accordance with subsection (b) of this Section.

*Section 10. Pledge of Delegates and Alternates.*

- a. Commitment to Candidate: By assenting to nomination on a Presidential candidate's slate, each delegate and alternate representing a Presidential candidate becomes pledged to the Presidential candidate on whose slate the delegate and alternate is nominated in accordance with Subsection b of this section.
- b. Length of Commitment: A person who is elected as a delegate or alternate to the National Convention on the slate of a Presidential candidate by the State Convention to represent that particular Presidential candidate at the National Convention and who does not resign from the position is pledged to support that Presidential candidate at the National Convention until the candidate is nominated or until the delegate or alternate is released from the pledges as follows:
  1. First Nomination Convention Ballot: A delegate or alternate shall be released from the pledge only in the event of death, withdrawal, or by decision of the candidate. For the first ballot taken at the National Convention to determine the nominee of the Republican Party for the office of President of the United States, the totals of the votes of the members of the Texas delegation shall be announced as assigned in accordance with these Rules. No poll of the members of the delegation, except those delegates who are uncommitted, shall be taken for the announcement of the vote.
  2. Second Nominating Convention Ballot: A delegate or alternate shall be released from the pledge if the candidate has failed to receive twenty percent (20%) or more of the total vote cast on the preceding ballot; or by the decision of the candidate;
  3. Third and Subsequent Nominating Convention Ballots: All delegates and alternates are released from any pledge.
- c. Uncommitted Delegates: Uncommitted delegates and alternates may vote as they choose on all questions and candidates presented at the National Convention.

*Section 11. Delegate/Alternate Resignation*

- a. Written Notice: Any delegate or alternate may resign by giving written notice to the Delegation Chairman and the State Chairman at any time before the date of the National Convention.
- b. Filling Vacancy: Should a vacancy occur in the at-large delegation after the date of the State Convention but prior to the convening of the National Convention, the Chairman of the National Nomination Committee of the State Convention shall fill such vacancy by appointing, in writing, any at-large alternate to fill any at-large delegate position. To fill the vacancy of an at-large alternate, the said Chairman may select any person eligible under this Rule to hold said position, inasmuch as possible under The Rules of the Republican Party. In the case of a vacancy in a district delegate position, the paired alternate shall be moved over, and the presidential candidate or his/her designated representative shall appoint a new alternate, with the condition that the person so appointed shall reside in the same Congressional District at the time of appointment as the Congressional District in

which the vacancy occurred. In the case of a vacancy in a district alternate position, the presidential candidate or his/her designated representative shall appoint a new alternate, with the condition that the person so appointed shall reside in the same Congressional District at the time of appointment as the Congressional District in which the vacancy occurred. All appointments shall be made from those nominated at the convention, if possible. If no potential nominee exists, then the presidential candidate or his/her designated representative shall appoint as a new alternate anyone eligible under this Rule to hold said position, provided that said nominee(s) agree to adhere to pledge to the candidate required under Section 10 hereof.

*Section 12. Delegate/Alternate Qualifications*

Each nominee for delegate and alternate must have voted in the Republican Presidential Primary, and must be qualified to be a delegate or alternate under The Rules of the Republican Party.

**Rule No. 39 – Presidential Electors**

At the Biennial State Convention in presidential election years, the delegates from each Congressional District shall nominate one (1) Presidential Elector and such nomination shall be presented to the National Nominations Committee; additionally, the National Nominations Committee shall select additional nominees to bring to total number of nominees to the number allowed by law. Each such nominee for Presidential Elector, prior to the report of the National Nominations Committee, shall file with the Chairman of the National Nominations Committee an affidavit in writing as to the nominee's commitment to vote for the Republican Party's nominees for President and Vice President. The report of the National Nominations Committee shall include only nominees who have so filed such affidavit. The report of the National Nominations Committee must include the nominees from the Congressional District who have so filed affidavits. The Convention shall then elect the Presidential Electors. Any vacancy among the Presidential Electors shall be filled by majority vote of the SREC, with the conditions that (1) the person elected to fill the vacancy shall have already filed with the State Chairman an affidavit in writing as to his or her commitment to vote for the Republican Party's nominees for President and Vice President and (2) if the vacancy occurs for a person who had been nominated by his or her Congressional District Caucus at the biennial State Convention then the SREC shall elect a person who has filed such an affidavit, has made an affiliation with the Republican Party of Texas under Chapter 162 of the TEC, and resides in that same congressional district at the time he or she is elected by the SREC to be a replacement Presidential Elector.

**Rule No. 40 – National Committeeman and Committeewoman**

At the biennial State Convention held in presidential election years, each Congressional District shall caucus and recommend a man for Republican National Committeeman from Texas and a woman for Republican National Committeewoman from Texas. These recommendations shall be forwarded to the National Nominations Committee by the district's member to the committee, who shall support them on at least the first (1st) round of voting. The National Nominations Committee shall select one (1) man and one (1) woman from these recommendations to be submitted to the Convention as nominees for these positions. Nominations from the floor shall be allowed only for candidates recommended by at least three (3) districts, or by petition signed by delegates equal in number to at least twenty percent (20%) of the convention voting strength. In the event of a vacancy in the office of National Committeeman or

Committeewoman the vacancy shall be filled by a majority vote of the State Republican Executive Committee.

**Rule No. 41 – State Party Chairman and Vice Chairman**

At the biennial State Convention, each Senatorial District shall caucus and recommend a man and woman for State Chairman and Vice Chairman. These recommendations shall be forwarded to the State Nominations Committee by the district's member to the committee, who shall support them on at least the first (1st) round of voting. The State Nominations Committee shall select one (1) man and one (1) woman from these recommendations to be submitted to the Convention as nominees for these positions. Nominations from the floor shall be allowed only for candidates recommended by at least three (3) districts, or by petition signed by delegates equal in number to at least twenty percent (20%) of the convention voting strength. No person shall be eligible to be elected Chairman or Vice Chairman for more than four (4) consecutive two-year terms to the same office.

**Rule No. 42 – State Republican Executive Committee (SREC)**

At the biennial State Convention, each Senatorial District shall caucus and recommend two (2) nominees to represent that Senatorial District on the SREC as Committeeman and Committeewoman. The results shall be forwarded to the State Nominations Committee by the district's member to the committee, and the committee shall include the results in its report to the Convention. Those members selected to represent a particular Senatorial District must be those recommended by the convention delegates representing that Senatorial District. For the purposes of election to, and service on, the SREC a person must be a resident of the district he or she represents as indicated by his or her current voter registration. No person shall be eligible to be elected State Republican Executive Committee man or woman for more than four consecutive two-year terms. SREC Committeeman and Committeewoman are ex-officio members of their SD Counties Executive Committees, without the right to make motions or vote. No member of the SREC may hold any elective federal, state or county office. The SREC shall be authorized to approve the minutes of the State Convention.

## **GENERAL RULES FOR CANDIDATES**

### **Rule No. 43 – Candidate Platform Review**

The Republican Party of Texas shall make an electronic copy of the most recent Platform available on its website. The County or State Chairman shall distribute a copy of the Platform to each candidate along with all other candidate application papers. The County or State Chairman shall request each non-judicial candidate to indicate whether the candidate agrees, disagrees, or is undecided for each bullet point item of the Party Principles included in the Preamble of the Platform and may include comments if desired. The County or State Chairman shall also request that each non-judicial candidate read the entire Platform and indicate at least ten (10) line items from the Platform that the candidate strongly supports. All candidates for non-judicial offices should file the completed Platform Review containing the candidate's responses at the time of filing for office. Candidates' responses shall be collected and recorded by the filing entity and may be published on the filing entity's website prior to the primary. If the filing entity has no website, a copy of the candidate's responses may be received from the filing entity. At the discretion of the Executive Committee of the filing entity, a candidate's response may be excluded from posting to the website of the filing entity.

### **Rule No. 43A**

The Platform Committee of the biennial State Convention shall prepare a list of no less than ten (10) and no more than twenty (20) principles included in the Preamble of the Platform of the Republican Party of Texas which clearly defines the Party's values, with the knowledge and purpose that they be used to identify candidate values as stated in Rule No. 43. A candidate must return the candidate's completed Platform Review and the completed Candidate Resource Committee (CRC) funding application to be eligible to receive funds from the CRC of the SREC.

### **Rule No. 44 - Censure Process and Penalties**

A County or Senatorial District Convention or a County or District Executive Committee may, after notice and invitation to the officeholder to appear and be provided time to speak before a County or Senatorial Convention or a County or District Executive Committee, by a two-thirds (2/3) vote of those present and voting, but in no case by less than a majority of the CEC in full, adopt a resolution censuring a Republican public or party office holder representing all or a portion of that County or District for three (3) or more actions taken during the current biennium in opposition to the core principles of the Republican Party of Texas defined in the Preamble of the Party Platform as described in Rule No. 43A. Such a resolution may include a request, to the SREC or any State Convention held prior to start of the filing period of a Republican Primary Election while these rules are in effect, that the named officeholder be penalized. If such a request is included, after notice and invitation to the officeholder to appear and be provided time to speak before the SREC or the State Convention in conformity with the request, the delegates of the State Convention by majority vote in the case of (a) below, or by a two-thirds (2/3) vote in the case of (b) below, or the State Republican Executive Committee by a three-fifths (3/5) vote of the full membership, may vote to concur with the resolution of censure and impose one or both of the following penalties:

- a. declare that no Rule or Bylaw enacted by any division of the Party at any level that demands the Party be neutral in intraparty contests shall be observed with respect to the named officeholder, and no financial or other support shall be provided to their campaign by the Party except that which is required by law.

- b. declare that the named officeholder is discouraged from participating in the Republican Party Primary following the censure passage. In the event the officeholder files an application to run for any public or party office in the Republican Party primary following the censure resolution's passage, the SREC shall be authorized to spend up to 12% of the Party's general fund on voter education in the officeholder's district, by republishing the original censure resolution verbatim, using a media format determined by the SREC.

Any above penalty imposed shall expire at the beginning of the State Convention following its adoption.

**Rule 45 - Clean Hands Rule**

Any individual or leader of a Political Action Committee who has an outstanding fine or has been finally convicted by a local, state, or federal authority for a violation of Texas Election Code shall be ineligible to serve as an officer of the Republican Party at any level until or unless the fine has been paid or the sentence has been fulfilled whereupon the person may be reappointed or duly elected pursuant to Party rules for filling a vacancy.

**Republican Party of Texas 512-477-9821 (Telephone) 512-480-0709 (Fax)**

The State Executive Committee amended Rule Nos. 1(e), 19, and 27A on August 28, 2021 in Lubbock, Texas. These amendments are effective upon filing per Tex. Elec. Code §163.005(e).

These rules were originally adopted by the State Executive Committee on March 13, 1972 in Austin, Texas and amended by the:

State Convention on September 19, 1972 in Dallas, Texas;  
State Convention on September 17, 1974 in Houston, Texas;  
State Convention on June 19, 1976 in Fort Worth, Texas;  
State Convention on September 11, 1976 in Austin, Texas;  
State Convention on September 9, 1978 in Dallas, Texas;  
State Convention on June 21, 1980 in Houston, Texas;  
State Convention on September 6, 1980 in San Antonio, Texas;  
State Convention on September 11, 1982 in Austin, Texas;  
State Convention on September 22, 1984 in Corpus Christi, Texas;  
State Executive Committee on November 23, 1985 in Austin, Texas;  
State Convention on June 28, 1986 in Dallas, Texas;  
State Executive Committee on May 30, 1987 in Austin, Texas;  
State Executive Committee on November 21, 1987 in Copperas Cove, Texas;  
State Convention on June 10, 1988 in Houston, Texas;  
State Convention on June 30, 1990 in Fort Worth, Texas;  
State Convention on June 20, 1992 in Dallas, Texas;  
State Convention on June 11, 1994 in Fort Worth, Texas;  
State Convention on June 13, 1998 in Fort Worth, Texas;  
State Convention on June 16, 2000 in Houston, Texas;

State Convention on June 8, 2002 in Dallas, Texas;  
State Convention on June 4, 2004 in San Antonio, Texas;  
State Convention on June 3, 2006 in San Antonio, Texas;  
State Convention on June 13, 2008 in Houston, Texas;  
State Convention on June 12, 2010 in Dallas, Texas;  
State Executive Committee on October 1, 2011 in Austin, Texas;  
State Executive Committee on February 29, 2012 in Austin, Texas;  
State Convention meeting on June 8, 2012 in Fort Worth, Texas;  
State Executive Committee on December 7, 2013 in Austin, Texas;  
State Convention on June 6, 2014 in Fort Worth, Texas;  
State Executive Committee on March 7, 2015 in Austin, Texas;  
State Executive Committee on September 12, 2015 in Austin, Texas;  
State Convention on May 13, 2016 in Dallas, Texas;  
State Executive Committee on March 4, 2017 in Austin, Texas;  
State Executive Committee meeting on April 7, 2018 in Austin, Texas;  
State Convention on June 16, 2018 in San Antonio, Texas;  
State Executive Committee on September 14, 2019 in Austin, Texas; and  
State Convention on October 6, 2020 by electronic vote.

**Bylaws of the MONTGOMERY COUNTY REPUBLICAN PARTY OF TEXAS 2020-2022**

**Adopted August 18, A.D. 2020**

**ARTICLE I – Name**

The name of this organization shall be the “Montgomery County Republican Party of Texas”, hereinafter referred to as the “Executive Committee”.

**ARTICLE II – Purpose**

For the purpose of advancing the political interests and effectiveness of Montgomery County Republicans and complying with laws governing political parties, the Executive Committee shall:

1. Promote and support the election of Republican candidates to public office;
2. Perform such duties as specified in the Texas Election Code;
3. Supervise the overall conduct of primary elections [TEC 172];
4. Administer a biennial County Primary and manage the county primary fund [TEC 173B];
5. Observe all state and federal election laws;
6. Promote the State Republican Party platform and positions; and
7. Perform such other duties as are consistent with the objectives stated in this Article.

**ARTICLE III – Membership**

**Section 1. Composition**

The Executive Committee shall consist of the County Chairman and the Precinct Chairmen of the respective election precincts, otherwise known as the Executive Committee, in the county [TEC [171.022](#)].

**Section 2. Eligibility**

To be eligible to be a candidate for or to serve as Precinct Chairman or County Chairman, a person must be a qualified voter residing within the bounds of the entity represented, and that person must have voted in the most recent prior Republican primary or take an oath of affiliation to the Republican Party [TEC [161.005](#); [171.023](#)].

**Section 3. Term**

Each Executive Committee member serves for a term of up to two (2) years, ending on the twentieth (20th) day after the primary runoff election day [TEC [171.022\(c\)](#)].

**Section 4. Filling Vacancies**

Any vacancy in the office of Precinct Chairman shall be filled by appointment of the Executive Committee. The person selected to fill the vacancy must receive a majority vote of those Committee members voting [TEC [171.024](#)] and must be eligible to serve as a Republican Precinct Chairman.



- A. Except as provided in Subsection B, one third (33.33%) of the total membership, excluding vacant chairs, of the Executive Committee must participate in the election to fill a vacancy in the office of precinct chair [[TEC 171.024\(c\)](#) and [RPT Rule 9.a](#)].
- B. If there is only one candidate to fill a vacancy and that person was elected as a Precinct Chairman in the most recent primary election in Montgomery County and is eligible to serve in the office, only twenty-five percent (25%) of the total membership of the Executive Committee must participate in the election to fill the vacancy. [[TEC 171.024\(c\)](#) and [RPT Rule 9.a](#)].

## **Section 5. Duties**

1. Follow the bylaws of the 2020-2022 MCRP Executive Committee,
2. Regularly attend Executive Committee meetings, and
3. Support the purposes listed in Article II.

## **Section 6. Resignation and Removal**

If a member or an officer of the Executive Committee wishes to resign,

1. The member or officer must give written notice to the Secretary.
2. If the notice is not specific to position of resignation, it applies to all positions held within the Executive Committee.
3. If the notice is not specific to the effective date of the resignation, it is effective immediately upon receipt by the Secretary.
4. Failure to follow the duties of a member is subject to formal reprimand, censure, and removal in accordance with the resolution adopted by the Executive Committee, TEC 171.029 and RPT rule 8n. Any such action requires two thirds ( $\frac{2}{3}$ ) approval of members present and voting (not counting vacancies) with at least 50% of the members voting.

## **ARTICLE IV – Officers**

### **Section 1. Elected Officers**

In addition to the County Chairman, the Elected Officers of the Executive Committee shall be the Vice Chairman, Secretary, and Treasurer.

#### **A. County Chairman**

The County Chairman is the presiding officer, elected at the general primary election by majority vote of the qualified voters of the county who vote in the primary on that office or appointed by the county executive committee and is subject to all applicable laws [[TEC 171.021](#)-171.029 and [RPT Rules 8](#) and 9].

#### **B. Vice Chairman, Secretary, and Treasurer**

1. Shall be a person who resides within Montgomery County and voted in the most recent Republican primary election.
2. Shall be elected by the Executive Committee at the biennial organization meeting.  
Nomination: Nominations for each position shall be made from the floor. After

nominations have been made, the nominees shall draw numbered lots as to speaking order. The nominee drawing the number 1 shall speak first, each nominee shall have three (3) minutes to speak, with no time for those who wish to speak on behalf of the nominee.

3. Voting: After all nomination speeches have concluded, voting shall be conducted by secret paper ballot. The Chairman shall appoint three (3) non-nominated Precinct Chairs to count the ballots. Each nominee may have one (1) teller to witness the vote counting. The candidate receiving the majority of the votes shall win the election.
4. Runoff: If no candidate receives the majority of the votes, a runoff election shall be conducted for the recipients with the two highest vote counts. There shall be no additional time for speeches. A new paper ballot shall be prepared.
5. Voice Vote: If there is only one nomination for a position, the voting may be by voice vote, or the presiding Chairman may declare the sole nominee elected.

## **Section 2. Officer Terms**

The term of office for all officers expires concurrently with that of the Executive Committee.

## **Section 3. Removal of Officers**

The Vice Chairman, Secretary, or Treasurer shall be removed by a two-thirds ( $\frac{2}{3}$ ) vote of the Executive Committee members present with at least 50% of the members voting.

## **Section 4. Filling Officer Vacancies**

- A. County Chairman: A vacancy in the office of County Chairman shall be filled in accordance with the provisions of the Texas Election Code [[TEC 171.025](#)]. A majority of the total membership of the Executive Committee must participate in the election to fill a vacancy in the office of county chair [[TEC 171.024\(b\)](#)].
- B. Vice Chairman, Secretary or Treasurer: A vacancy in the office of Vice Chairman, Secretary or Treasurer shall be filled in accordance with the procedures in Article IV, Section 1 of these bylaws at the next called Executive Committee meeting with at least 40% of members voting.

## **Section 5: Officer Duties**

Duties of the officers shall be as follows:

- A. County Chairman – The County Chairman, as the presiding officer of the executive committee, shall ensure compliance of the Executive Committee with all applicable federal and state laws, with these bylaws, and with the Rules of the Republican Party. The Chairman shall preside over the Steering Committee. That office shall make available any and all information to Steering, Permanent and Ad-Hoc Committees, within a reasonable time, depending on the urgency of the situation. The county chairman shall facilitate transfer of all assets (including but not limited to bank accounts, online presence, email lists, contact lists, and leased space) to the control of the Executive Committee, except for the bank accounts over which the county chair has authority pursuant to Section 171.028 of the Texas Election Code. The bylaws shall not deprive the Chairman statutory authority and duties outlined in the Texas Election Code, or conflict with the Texas Election Code in any way.

- B. Vice Chairman – The Vice Chairman shall preside over the Steering Committee in the absence of the Chairman, and shall assist the Chairman, as requested, in performance of the office. In the event of the Chairman's absence or inability to serve, the Vice Chairman shall serve as acting Chairman until the Chairman resumes their duties or until a new Chairman is elected. In the absence of the Vice Chairman, the Secretary shall preside over Executive Committee meetings.
- C. Secretary – The Secretary shall carry out the usual duties of that office, keeping an up-to-date roll of the Executive Committee members and ensuring that each member receives timely notices of meetings and maintaining a permanent file containing the minutes of all Executive Committee meetings. In the event of a vacancy in the office of County Chairman, the Secretary shall call a meeting of the Executive Committee for the purpose of electing a new Chairman, as outlined in the Texas Election Code [TEC 171.025 (a)]. The Secretary is authorized to receive and preserve applications for a place on the primary ballot, as provided in the Texas Election Code [TEC 171.022 (a)(2)]. The Secretary shall preside over Executive Committee meetings in the absence of the Chairman and Vice Chairman, and the Steering Committee in the absence of the Chairman and Vice Chairman. At the start of each meeting, the presiding officer shall direct the Secretary to do a roll call to assess who is present. The Secretary also maintains Executive Committee attendance records.
- D. Treasurer – The Treasurer shall be responsible for keeping necessary and appropriate financial records for the Executive Committee, for complying with all applicable state and federal laws [statutes] with regard to reporting contributions and expenditures, and shall prepare periodic reports of the financial condition for presentation to the Executive Committee, as requested by the Steering Committee.

## **ARTICLE V – Steering Committee**

### **Section 1. Composition and Election**

The Steering Committee shall be composed of the County Chairman, the Vice-Chairman, the Secretary, the Treasurer, and five (5) Precinct Chairs. (These five (5) precinct chairs are called Executive Committee Representatives or EC Reps or EC Representatives).

- A. Presiding Officer: The Chairman shall preside over the Steering Committee. In his or her absence, the Vice Chairman shall preside over the Steering Committee.
- B. Voting Members: The voting members of the Steering Committee shall be the Chairman, the Vice Chairman, the Secretary, the Treasurer, and the five (5) elected EC Representatives.
- C. Election of the five (5) EC Representatives
  - 1. The EC Representatives shall be elected by the Executive Committee at the biennial organizational meeting.
  - 2. Nominations: Nominations shall be made from the floor. After nominations have been made, the nominees shall draw numbered lots as to speaking order. The nominee drawing the number 1 shall speak first, followed by number 2, and so forth in sequential number order. Each nominee shall have a total of three (3) minutes to speak, with no time for those who wish to speak on behalf of the nominee.
  - 3. Voting: After all nomination speeches have concluded, voting shall be conducted by secret paper ballot. The Chairman, Vice Chairman, and Secretary shall count the votes. Each nominee may have one (1) teller to witness the vote counting.

4. Ballots: Each paper ballot shall consist of up to five (5) blank lines, one for each open EC Representative position. Each Precinct Chair present shall be entitled to receive one paper ballot. On the paper ballot, those entitled to vote may write up to five names - one name per line. The order in which the names are written on the ballot is of no consequence. A ballot may not contain the name of any nominee(s) multiple times; in such an event the name of nominee(s) shall be counted as having received only one vote per nominee on the particular paper ballot. However, if a ballot contains six or more different names, then that entire cast ballot shall be declared invalid and shall not be counted.
5. Declaring Winner: Each open position is filled in descending order of votes received, provided that the nominee so assigned has received a majority of the total votes cast.
6. Runoff: In the event that any open EC Representative positions remain after each nominee receiving a majority of votes has been assigned a position, a runoff election shall be conducted for the nominees who did not receive a majority of votes. There shall be no additional time for speeches. A new paper ballot containing lines for the number of positions remaining to be filled shall be prepared. Each voting member present shall be entitled to receive one paper ballot. On the paper ballot, those entitled to vote may write up to one name per line. A ballot may not contain the name of any nominee(s) multiple times; if a ballot contains the name of any nominee(s) multiple times, the name(s) of nominee(s) shall be counted as having received only one vote per nominee on that particular paper ballot. If a ballot contains more different names than remaining positions, then that entire cast ballot shall be declared invalid and shall not be counted.
7. Conclusion of Voting: Each open position is filled in descending order of votes received, provided that the nominee so assigned has received a majority of the total votes cast. If necessary, the runoff process is repeated until all open EC Representative positions have been filled.
8. Voice Vote: If the number of nominees is the same or less than the number of open EC Representative positions, then voting may be by voice vote, or the presiding officer may declare those nominees elected.

## **Section 2. Quorum, Meetings, Voting, and Proxies**

- A. Quorum: A quorum for the Steering Committee shall consist of 40% or more of the voting members. Matters shall only be voted on in a meeting where a quorum of Steering Committee members is present in person, via telephone conference call, or a combination of in person and via telephone conference.
- B. Meetings and Voting: No meeting and no voting shall be conducted via email, except when declared open by majority vote of the Steering Committee or by the presiding officer, either in the call of the meeting or after the meeting has come to order. All Steering Committee members shall be allowed to attend any Steering Committee meeting in person or via telephone conference call. The Secretary shall keep written minutes of all Steering Committee meetings and shall distribute the written minutes to the Executive Committee with the call for the next scheduled Executive Committee meeting.
- C. Proxies: No proxies are allowed for Steering Committee members [RPT Rule No. 6].
- D. Any Steering Committee meeting is open to the Executive Committee or any Standing or Ad-Hoc committee member.

**Section 3. Steering Committee Duties**

It shall be the duty of the Steering Committee to:

- A. Assume responsibility for the transaction of business necessary between meetings of the Executive Committee and to:
  - 1. Prepare an annual budget for the Executive Committee each year;
  - 2. Submit that budget to the Executive Committee each year at a meeting during the fourth quarter of the preceding calendar year;
  - 3. Execute all written contracts concerning employment, leases between the Executive Committee and any other third parties involving proceeds; and
  - 4. Authorize expenditures in accordance with the adopted budget and as funds are available.
- B. Appoint, remove, and fill vacancies with the concurrence of a majority of the members of the Executive Committee present at a called meeting of the Executive Committee for positions as follows:
  - 1. The Parliamentarian;
  - 2. The Sergeant at Arms;
  - 3. The Legal Counsel;
  - 4. The Rules Committee Chair;
  - 5. The Resolutions Committee Chair;
  - 6. The Candidates Committee Chair;
  - 7. The Finance Review Committee Chair;
  - 8. The Fundraising Committee Chair;
  - 9. The Technology Committee Chair;
  - 10. The Marketing/PR Committee Chair;
  - 11. The Community Engagement Committee Chair;
  - 12. The Headquarters Committee Chair;
  - 13. The Precinct Chair Support Committee Chair;
  - 14. Other standing, special, or ad hoc committee chairs as may be deemed necessary by the Executive Committee; and
  - 15. Other officers as deemed necessary.
- C. Develop the agenda for the Executive Committee meetings; and
- D. Adhere to election law requirements.
- E. Embrace all initiatives of the Statewide party (RPT).
- F. Recommend to the convening authority, members of the EC or other eligible Montgomery County voters, a list of personnel to officiate primary, runoff and general elections pertaining to the Republican Party. The Steering Committee must refrain from arbitrarily removing experienced members from being Election Judges, without due cause, primarily resulting from actionable complaints from Montgomery County Election Central and/or the Texas Secretary of State, regarding the conduct of an election.

**Section 4. Executive Committee Meeting Calls**

The Steering Committee may call an Executive Committee meeting by a majority vote. (Article VI, Section 2 - Meetings, within these By-Laws).

## **Section 5. Steering Committee Terms**

The elected Steering Committee members' terms expire concurrent with that of the Executive Committee.

## **Section 6. Steering Committee Meeting Calls**

Meetings can be called by the Chairman or Vice Chairman or at least three (3) members of the Steering Committee by a petition sent to the entire Steering Committee. Notice of regular Steering Committee Meetings must be at least seven (7) days before the meeting. Notice of an emergency Steering Committee Meetings must be at least two (2) days before the meeting.

Notice of all Steering Committee meetings consist of:

- Notice of date, time, location, and agenda,
- posting on website calendar, and
- Notice emailed to Executive Committee members and officers, all Sub Committee Chairs and Steering Committee members.

## **Section 7. Agenda**

Whoever has called the Steering Committee meeting shall prepare an agenda to be sent pursuant to Article V Section 6. The agenda for all Steering Committee meetings must be approved by majority vote at the beginning of each meeting. The Steering Committee may amend the agenda at the beginning of the meeting.

# **ARTICLE VI – Meetings**

## **Section 1. Frequency**

The Executive Committee shall meet at all times as required by the Texas Election Code and shall have at least one regular meeting each quarter.

## **Section 2. Meeting Calls**

Regular and statutory meetings shall be called by the County Chairman or the Steering Committee. Special meetings of the Executive Committee may be called by the County Chairman, with the approval of a majority of the Steering Committee. Special meetings also may be called by written petition signed by twenty percent (20%) of the total membership (not including vacancies) of the Executive Committee delivered to the Chairman, the Steering Committee, or to the Secretary at least fourteen (14) days before the desired meeting date, or in the event of a stated emergency, two (2) days. The purpose and order of business of the meeting must be stated in the call for any statutory, regular, or special meeting.

## **Section 3. Meeting Notice**

Notice of regular and special meetings of the Executive Committee shall be sent to each member of the Executive Committee by mail or e-mail at least fourteen (14) days in advance. Notice of meetings



of standing, special or ad hoc Sub Committees shall be posted on the website and emailed to County Chairman and Vice Chairman and subcommittee members at least seven (7) days in advance, two (2) days in advance for an emergency meeting.

#### **Section 4. Committee Report Submission**

All Sub Committee reports shall be submitted at the Executive Committee meeting.

#### **Section 5. Quorum**

A quorum for all meetings required by the Texas Election Code, in which only statutorily required business is conducted, shall be those members present [[RPT Rule 9.b](#)]. A quorum for the conduct of any other business except filling vacancies shall be twenty-five percent (25%) of the total membership of the Executive Committee, unless otherwise noted within these bylaws. [[TEC 171.024](#)]

#### **Section 6. Agenda**

The agenda for regular meetings of the Executive Committee shall include New Business. The presiding officer shall respectfully give all precinct chairs an opportunity to present information during New Business. The Chairman or Steering Committee, whichever has called the County Executive Committee, shall prepare an agenda, and send it to the precinct chairs with the meeting call. The agenda for all county executive committee meetings must be approved by majority vote at the beginning of each meeting. The executive committee may amend the agenda at the beginning of the meeting, by majority vote of those present and once the agenda is approved it can be changed by 2/3 vote of members present.

#### **Section 7. Discussion and Debate**

Discussion or debate on any resolution or other matter of business brought before the Executive Committee shall be limited to a total of four (4) speakers "For" and four (4) speakers "Against". (There does not need to be an equal number of "For" and "Against" speakers.) Each speaker shall be entitled to speak not more than five (5) minutes on a main motion and two (2) minutes on amending motions, provided, however, that the limitations contained in this section may be suspended by a majority vote of those members present and voting.

#### **Section 8. Open to the Public**

All Executive Committee meetings shall be open to the public. The public shall be allowed to film or record at any time.

### **ARTICLE VII – Sub Committees**

#### **Section 1. Victory 2020 Committee**

The purpose of the committee is to lead, organize, and encourage the effort to "get out the vote" for all uncensured Republican candidates in the November 2020 election. At the organizational Executive Committee meeting, the Executive Committee shall elect by majority vote the chair of the Victory 2020 Committee. The Victory 2020 Committee chair shall select the members of the

committee. The Executive Committee maintains control of the Victory 2020 Committee chair and members.

## **Section 2. Vacancy Committee**

The purpose of the committee is to review and recommend individuals to fill vacancies. At the organizational Executive Committee meeting, the Executive Committee shall elect by majority vote the chair of the Vacancy Committee. The chair shall select the members of the committee. There should be a minimum of 5 and a maximum of 15 members on this committee. The Executive Committee maintains control of the Vacancy Committee chair and members. The Vacancy Committee shall report vacancy recommendations to the Executive Committee for a vote. Each vacancy is voted separately.

## **Section 3. Resolutions Committee**

The Steering Committee shall establish and appoint a chair for the Resolutions Committee for the purpose of considering resolutions. Resolutions should be emailed to the Resolutions Committee chair several days prior to an Executive Committee meeting. For a resolution to be considered at an Executive Committee meeting, sufficient paper copies of the resolution shall be available at the meeting.

## **Section 4. Rules Committee**

The Steering Committee shall establish and appoint a chair for the Rules Committee for the purpose of considering supplemental rules that are not in conflict with the most recent Texas Election Code, Republican Party of Texas Rules, or changes to these bylaws.

## **Section 5. Financial Review Committee**

The Steering Committee shall establish and appoint a chair for the Financial Review Committee for the purpose of providing oversight and review of all finances related to Executive Committee funds. The Treasurer is required to be a member of the Finance Committee.

## **Section 6. Candidates Committee**

The Steering Committee shall establish and appoint a chair for the Candidates Committee. They shall vet candidates and/or issues in non-partisan races. The Candidates Committee shall present their report to the Executive Committee. Passage of a motion to endorse or oppose a candidate or issue in a non-partisan election shall require a majority vote of the Executive Committee members present and voting.

## **Section 7. Fundraising Committee**

The Steering Committee shall establish and appoint a chair for a Fundraising Committee for the purpose of raising money for the party. The committee may also plan fundraising events at the direction of the Steering Committee and with the approval of the Executive Committee. Any expenditures made to raise funds must be approved through normal policies and procedures established by the Steering Committee and the Executive Committee. The Treasurer is required to be a member of the Fundraising Committee.



**Section 8. Technology Committee**

The Steering Committee shall establish and appoint a chair for the Technology Committee for the purpose of using technology to support the purposes of the party.

**Section 9. Marketing/PR Committee**

The Steering Committee shall establish and appoint a chair for the Marketing/PR Committee. The purpose of the committee is to promote the efforts of the Montgomery County Republican Party and its brand through public relations initiatives and postings via the email distribution list, social media, and other sources. In addition, the Marketing/PR Committee works with other committees to maximize efforts for successful events and other community involvement activities.

**Section 10. Headquarters Committee**

The Steering Committee shall establish and appoint a chair for the Headquarters Committee. The purpose of the committee is to develop and maintain a list and schedule of volunteers to support the day-to-day operations of the Montgomery County Republican Party headquarters.

**Section 11. Community Engagement Committee**

The Steering Committee shall establish and appoint a chair for the Community Engagement Committee. The purpose of the committee is to engage Republican voters in voter registration drives, events, and community involvement activities.

**Section 12. Precinct Chair Support Committee**

The Steering Committee shall establish and appoint a chair for the Precinct Chair Support Committee. The purpose of the committee is to develop and conduct training programs and prepare training materials and resources for Precinct Chairs. The committee is also responsible for developing a mentorship program to support new Precinct Chairs.

**Section 13. Other Standing Committees**

The Steering Committee may establish and appoint such standing committees as it deems necessary, subject to the confirmation of a majority of the Executive Committee.

**Section 14. Special or Ad Hoc Committees**

The Steering Committee may establish and appoint such special or ad hoc committees as it deems necessary to assist in carrying out such duties not specifically assigned to a standing committee, subject to the confirmation of a majority of the Executive Committee.

**Section 15. Sub Committee Membership**

Membership shall be no less than three (3) members, nominated by the Sub Committee Chair and confirmed by the Executive Committee, by majority vote of members present and voting. A member

of the respective committees above are not required to be a member of the Executive Committee but must be a resident of Montgomery County who voted in the most recent Republican Primary.

### **Section 16. Transparency**

When the Steering Committee recommends a committee chair and/or members of any committee(s), the names and positions for said committee(s) shall be published on the MCRP website and sent to all Executive Committee members no less than 14 days prior to the meeting to vote on said committee(s).

Notice for all committee meetings shall be published on the MCRP website at least three (3) days before the scheduled meeting.

### **Section 17. Sub Committee Quorum and removal**

Sub Committee meeting quorum shall be 33% of subcommittee membership, but never less than 3 people. Sub Committee members who have never attended the Sub Committee meeting shall not be counted when calculating a quorum. Sub Committee members who have missed 3 meetings in a row shall be automatically removed from the Sub Committee.

## **ARTICLE VIII – Publication of Bylaws and Meeting Minutes**

A copy of the Bylaws of the Executive Committee, as adopted by the Executive Committee, shall be posted on the Montgomery County Republican Party website within three (3) business days of adoption. A copy of the Executive Committee meeting minutes shall be posted on the Montgomery County Republican Party website within three business days.

## **ARTICLE IX – Paid Staff Policy**

### **Section 1. Paid Staff Member Neutrality**

Paid staff members shall remain neutral in intraparty contests for both public and Party offices.

### **Section 2. Hiring and Termination of Paid Staff**

Authority to hire or terminate all paid staff shall rest with the Executive Committee. All employment opportunities shall be considered “At-Will”. A majority vote by the Executive Committee with at least 50% of the membership voting shall be required to hire or terminate any paid staff.

### **Section 3.**

The Steering Committee shall review the performance of all paid staff at least annually and present a report on their findings to the Executive Committee at least fourteen (14) days in advance of the next scheduled meeting and presented at that meeting the Executive Committee.

## **ARTICLE X – Parliamentary Authority**

The rules contained in the most recent edition of *Robert's Rules of Order* shall govern the Executive Committee in all cases in which they are applicable and in which they are not inconsistent with these bylaws, any special rules the Executive Committee may adopt, the rules of the Republican Party of Texas, or applicable law.

## **ARTICLE XI – Area Chairs**

### **Section 1. Establishment and Purpose of Area Chairs**

The Montgomery County Republican Party shall establish area chairs to lead and organize Republican efforts and to assist the Precinct Chairs within their respective areas (precincts) of responsibility.

### **Section 2. Area Chair Election**

Area chairs shall be elected by majority vote of a caucus composed of the Precinct Chairs within a geographical area comprised of precincts. Area Chairs shall appoint a vice-chair to assist them in their duties.

### **Section 3. Area Chair Areas**

The Steering Committee shall determine the boundaries of each area chair region.

## **ARTICLE XII – Candidate/Issue Endorsements & Censures**

### **Section 1. Primary Ballot Endorsement (Prohibited)**

The Executive Committee and Steering Committee, as a collective body, shall not endorse any candidate or issue on the Republican primary or primary runoff ballot. The exception to this rule is found in Section 3 of this Article. This does not preclude a precinct chair, or a group of chairs, from supporting, recommending, or endorsing candidates or issues. The resources of the MCRP, including the official email system, social media accounts, mailing list, etc. may not be used by any Executive Committee member(s) to support a candidate, to promote any endorsement by any Executive Committee member(s), or issue in the Republican primary or primary runoff.

### **Section 2. Non-Partisan Election Endorsement (Allowed)**

The Executive Committee may endorse identifiable and uncensured Republican candidates in non-partisan races. If more than one identifiable and uncensured Republican candidate is running in a non-partisan race, they shall endorse all of the identifiable and uncensured Republican candidates or none of them. The Executive Committee shall not choose one identifiable and uncensured Republican over another identifiable Republican in a non-partisan race. The Montgomery County Executive Committee may support or oppose any issue in a nonpartisan election when it is clearly spelled out in the current Texas GOP Platform.

**Section 3. Censured Candidate**

The Executive Committee may by a two-thirds (2/3) vote of those present and voting, with 50% or more of the members voting, adopt a resolution censuring a Republican public or party office holder or candidate representing all or a portion of the County for not fulfilling their duties or for three (3) or more actions taken during the current biennium in opposition to the core principles of the Republican Party of Texas defined in the Preamble of the Party Platform as described in Rule No. 43A. Such a resolution may include that the named office holder be penalized and censured and declare that no Rule or Bylaw enacted by any division of the Party at any level that demands the Executive Committee be neutral intraparty contests shall be observed with respect to the named candidate, and no financial or other support shall be provided to their campaign by the Party except that which is required by law. Any such penalty shall expire after the current biennium. If there is more than 1 other candidate in the race with the named candidate, all candidates other than the named candidate must be treated equally.

**ARTICLE XIII – Website and Social Media****Section 1. Website and Social Media**

The Steering Committee shall direct a Sub Committee to oversee the website and social media functions. All members and officers of the Executive Committee shall only use the official website and social media accounts for official Executive Committee functions. The Executive Committee has ultimate control over the committee in charge of website and social media.

At the beginning of the biennium, all previous online presence of the Executive Committee as a collective body shall be transferred to the current Executive Committee. Failure to do so is misconduct and subject to formal reprimand, censure, and removal from membership in the Executive Committee, pursuant to the procedures set forth in these bylaws. Notwithstanding the foregoing, nothing should be construed to prevent or limit the personal social media functions or online presence of individual members.

**Section 2. Contact and Email Lists**

The Executive Committee shall be ultimately responsible for control, maintenance and usage of the contact and email list from the 2016-2018 Executive Committee, 2018-2020 Executive Committee, and 2020-2022 Executive Committee. The county chair shall provide full access to these lists to the Executive Committee. Failure to do so is misconduct and subject to formal reprimand, censure, and removal from membership in the Executive Committee, pursuant to the procedures set forth in these bylaws.

**Section 3. Headquarters**

The Executive Committee shall be ultimately responsible for control of any office space leased by the MCRP. The county chair shall turn over control of any office space leased by MCRP for non-statutory uses to the Executive Committee. Failure to do so is misconduct and subject to formal reprimand, censure, and removal from membership in the Executive Committee, pursuant to the procedures set forth in these bylaws.

**ARTICLE XIV – Amendment of Bylaws****Section 1. Proposal of Amendments**

Any member or officer desiring to propose an amendment to these Bylaws shall submit a written copy to the Secretary not less than 21 days prior to a statutory, regular, or special meeting of the Executive Committee, at which meeting such proposed amendments shall be referred to the Rules Committee for its consideration. The Rules Committee shall report its recommendation to the Executive Committee at its next statutory, regular meeting or special meeting called for the purpose of amending the rules.

**Section 2. Notification to Executive Committee**

All members of the Executive Committee shall be emailed all proposed amendments within 3 days of receipt by the Secretary. All members of the Executive Committee shall be emailed the Rules Committee report no less than 7 days prior to the scheduled meeting at which the Executive Committee shall vote on the proposed rule changes.

**Section 3. Adoption of Amendments**

Amendments to the Bylaws need a ye a vote of two-thirds (2/3) vote of the members present when at least 50% of the members are voting at a scheduled Executive Committee meeting.

**ARTICLE XV – Contracts****Section 1. Approval**

Any contract shall need the review and approval of the Steering Committee before consideration and approval by the Executive Committee.

**Section 2. Who can sign**

Contracts can only be signed by the County Chairman, and/or Vice Chairman, and/or Treasurer after approval by the Executive Committee.

**Section 3. Duration**

No contract has any effect beyond the 20th day after the 2022 Montgomery County Republican Runoff election.

**Section 4. Responsibility**

The signer(s) bear personal financial responsibility and other obligations for any contracts extending or having any effect beyond the 20th day after the 2022 Montgomery County Republican Runoff election.

Any executed contract on behalf of the Executive Committee not approved by the Executive Committee is null and void.

**ARTICLE XVI – Online Meetings**

By majority vote of any Sub Committee, the Sub Committee may choose an online meeting format for their committee. In person and online meetings of a Sub Committee are open to the all Executive Committee members and officers, Sub Committee members & Steering Committee members as well as those persons identified in [RPT 8g](#).

By majority vote of the Steering Committee, the Steering Committee may choose an online meeting format for their committee. In person and online meetings of a Steering Committee are open to the all Executive Committee members and officers, Sub Committee chairs & Steering Committee members as well as those persons identified in [RPT 8g](#).

**Addendum A - Definitions - (these are not part of the bylaws)**

The terms used throughout these bylaws are defined as follows:

1. **“Executive Committee” and “EC”** - both mean the Montgomery County Republican Party of Texas.
2. **“County Chairman”** - the presiding officer, elected at the general primary election [Article IV, Sec. 1]
3. **“Precinct Chairman”** - an elected (or appointed) Republican Party representative from each county election precinct [Article III]
4. **“Election precinct”** - a numbered political subdivision, determined by a county’s commissioners court, that is compact and contiguous, based mainly on geography boundaries, population, and access to voting [TEC Title 4, Chapter 42]
5. **“Qualified voter”** - is 18 years or older; a United States citizen; has not been determined to be totally or partially mentally incapacitated; not a convicted felon; is a resident of Texas and is a registered voter[TEC Title 2, Chap. 11].
6. **“Primary”** - a process by which the general public can indicate their preference for a candidate in an upcoming general election or by-election, thus narrowing the field of candidates. And/or to vote on issues.
7. **“Primary runoff”** - an initial vote did not result in a winner because it was tied or too close to call. A runoff election settles the matter, providing a final decision.
8. **“Majority vote”** means greater than 50%.
9. **“RPT”** means Republican Party of Texas
10. **“Elected Officer”** - Vice Chair, Secretary, Treasurer
11. **“Quorum”** - a minimum number of members required to be present
12. **“Standing Committee”** - Committee/s with a continued existence, formed to do its assigned work on an ongoing basis.
13. **“Special” or “Ad Hoc”** committee - for a special purpose or end at hand; also, by extension, improvised or impromptu
14. **“Area Chair”** - representatives elected in caucuses that lead and organize Republican efforts and to assist the Precinct Chairs within their respective areas of responsibility [Article XI].
15. **“Caucus”** - closed meeting of a group of persons belonging to the same political party or faction usually to select candidates or to decide on policy.
16. **“Area”** - a defined, geographical boundary
17. **“Candidates Committee”** - vets candidates and/or issues in non-partisan races [Article VII Sec. 3 6]

Exhibit 4, Excerpts, Robert's Rules of Order, Newly Rev., 12<sup>th</sup> Ed.<sup>1</sup>

- 1:6 The basic principle of decision in a deliberative assembly is that, to become the act or choice of the body, a proposition must be adopted by a *majority vote*; that is, direct approval—implying assumption of responsibility for the act—must be registered by more than half of the members present and voting on the particular matter, in a regular or properly called meeting of the body (see also 44:1-2). Modifications of the foregoing principle that impose a requirement of more than a majority vote arise: (a) where required by law; (b) where provided by special rule of a particular organization or assembly as dictated by its own conditions; or (c) where required under the general parliamentary law in the case of certain steps or procedures that impinge on the normal rights of the minority, of absentees, or of some other group within the assembly's membership.
- 9:2 If, instead, an organization follows the practice of scheduling the day, hour, or place of its regular meetings by resolution, notice (also referred to as the call of the meeting) must be sent to all members a reasonable time in advance of each regular meeting.
- 9:15 The only business that can be transacted at a special meeting is that which has been specified in the call of the meeting. This rule, however, does not preclude the consideration of privileged motions, or of any subsidiary, incidental, or other motions that may arise in connection with the transaction of such business or the conduct of the meeting. If, at a special meeting, action is taken relating to business not mentioned in the call, that action, to become valid, must be ratified (see 10:54-57) by the organization at a regular meeting (or at another special meeting properly called for that purpose).
- 9:17 An *adjourned meeting* is a meeting in continuation of the session of the immediately preceding regular or special meeting. The name *adjourned meeting* means that the meeting is scheduled for a particular time (and place, if it is not otherwise established) by the assembly's "adjourning to" or "adjourning until" that time and place. If a regular meeting or a special meeting is unable to complete its work, an adjourned meeting can be scheduled for later the same day or some other convenient time before the next regular meeting, by the adoption (as applicable) of a main or a privileged motion to fix the time to which to adjourn, or a main motion to adjourn until the specified time (see 21, 22). In such a case, the adjourned meeting is sometimes spoken of as "an adjournment of" the regular or special meeting. This usage should not be confused with the act of adjourning.
- 9:33 **Types of Electronic Meetings.** Various provisions for electronic meetings are possible, so that more than the minimum standard of an audioconference may be required. Thus, if the bylaws provide for meeting by videoconference (but not merely by "teleconference" or "audioconference"), the meeting must be conducted by a technology that allows all participating members to see each other, as well as hear each other, at the same time. Provision may also be made for the use of additional collaborative technology to aid in the conduct of a meeting.

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<sup>1</sup> Footnotes have been removed from the text. Parentheticals used herein to indicate other sections of RONR, and are in the original text.



9:34 It is important to understand that, regardless of the technology used, the opportunity for simultaneous aural communication is essential to the deliberative character of the meeting. Therefore, a group that attempts to conduct the deliberative process in writing (such as postal mail, e-mail, “chat rooms,” or fax)—which is not recommended— does not constitute a deliberative assembly. Any such effort may achieve a consultative character, but it is foreign to the deliberative process as understood under parliamentary law.

9:35 **Electronic Meetings in Committees.** As in the case of a board or any assembly, committees that are expressly established by the bylaws can hold a valid electronic meeting only if authorized in the bylaws to do so. A committee that is not expressly established by the bylaws, however, may instead be authorized to hold electronic meetings by a standing rule of the parent body or organization, by the motion establishing the particular committee, or by instructions included in a motion referring an individual matter to the committee or issued subsequent to such a motion (see 13:8(d), 13:22).

9:36 **Additional Rules for the Conduct of Electronic Meetings.** If an organization authorizes its assembly, boards, or committees to hold electronic meetings, such a provision should indicate whether members who are not present in person have the *right* to participate by electronic means, or whether the body may choose to allow or disallow such participation; and, conversely, whether there is required to be a central location for members who wish to attend meetings in person. The notice of an electronic meeting must include an adequate description of how to participate in it (for example, the telephone number to call for a teleconference must be provided). Various additional rules (in the bylaws, special rules of order, standing rules, or instructions to a committee, as appropriate) may also be necessary or advisable regarding the conduct of electronic meetings, such as rules relating to:

- the type of equipment or computer software required for participation in meetings, whether the organization must provide such equipment or software, and contingencies for technical difficulties or malfunctions;
- methods for determining the presence of a quorum;
- the conditions under which a member may raise a point of order doubting the presence of a quorum, and the conditions under which the continued presence of a quorum is presumed if no such point of order is raised;
- methods for seeking recognition and obtaining the floor;
- means by which motions may be submitted in writing during a meeting; and
- methods for taking and verifying votes.

In addition, depending on the character of the organization, it may be advisable to adopt provisions for ensuring that nonmembers cannot participate in meetings (unless properly invited to do so), especially during any meeting or portion of a meeting held in executive session (For examples of rules for electronic meetings designed to meet various needs, see the appendix *Sample Rules for Electronic Meetings*, pp. 635-649.)

21:12 Regardless of the type of motion by which it is voted to adjourn, the meeting is not closed until the chair has declared that the meeting "is adjourned" (or "stands adjourned"), and members should not leave their seats until this declaration has been made. After it has been voted to adjourn but before the chair has declared the meeting adjourned, it is still in order to take any of the steps listed above (in 21:10), if necessary. In announcing an affirmative vote on a motion to adjourn, the chair should usually pause before declaring the meeting adjourned, saying: "The ayes seem to have it. [Pausing and resuming slowly:] The ayes have it, and the meeting is adjourned." The pause affords time for members to demand a division (29) on the vote to adjourn, or to take any of the other steps just described. If the chair learns, immediately after declaring the assembly adjourned, that a member seeking the floor for one of these purposes had risen and addressed the chair before the adjournment was declared, then, since the adjournment was improper and this breach was promptly noted, the chair must call the meeting back to order—but only long enough for the purpose for which the member legitimately sought the floor.

25:9 Rules which embody *fundamental principles of parliamentary law*, such as the rule that allows only one question to be considered at a time (5:4), cannot be suspended, even by a unanimous vote. Thus, since it is a fundamental principle of parliamentary law that the right to vote is limited to the members of an organization who are actually present at the time the vote is taken in a regular or properly called meeting (45:56), the rules cannot be suspended so as to give the right to vote to a nonmember, or to authorize absentee voting (45:56ff.). Likewise, since it is a fundamental principle that each member of a deliberative assembly is entitled to one—and only one—vote on a question, the rules may not be suspended so as to authorize cumulative voting (46:43).

40:12 When the chair has called a meeting to order after finding that a quorum is present, the continued presence of a quorum is presumed unless the chair or a member notices that a quorum is no longer present. If the chair notices the absence of a quorum, it is his duty to declare the fact, at least before taking any vote or stating the question on any new motion—which he can no longer do except in connection with the permissible proceedings related to the absence of a quorum, as explained above. Any member noticing the apparent absence of a quorum can make a point of order to that effect at any time so long as he does not interrupt a person who is speaking. *Debate* on a question already pending can be allowed to continue at length after a quorum is no longer present, however, until a member raises the point. Because of the difficulty likely to be encountered in determining exactly how long the meeting has been without a quorum in such cases, a point of order relating to the absence of a quorum is generally not permitted to affect prior action; but upon clear and convincing proof, such a point of order can be given effect retrospectively by a ruling of the presiding officer, subject to appeal (24).

62:9 Likewise, if the chair ignores an appeal appropriately made and seconded, a member can repeat the appeal and if, despite its being seconded, the chair ignores it again, the member can repeat it a third time and if it is again seconded but still ignored by the chair, the member can immediately, standing in his place, put the appeal to a vote without debate. The question may be put as: "Shall the decision of the chair be sustained?"

62:10 **Removal of Presiding Officer from Chair for All or Part of a Session.** If the chair fails to act in accordance with the assembly's decision on an appeal (or on a point of order submitted to a vote of the assembly) or otherwise culpably fails to perform the duties of the chair properly in a meeting, the assembly may employ measures temporarily to replace the chair with another presiding officer expected to act in accordance with the will of the assembly.

62:11 If the offending occupant of the chair is an appointed or elected chairman pro tem (see 47:11(2-3)), a motion can be made to "declare the chair vacant and proceed to elect a new chairman." Such a motion is a question of privilege affecting the assembly (19) and is an incidental main motion requiring a majority vote for its adoption.

62:12 If the chair is not an appointed or elected chairman pro tem, a motion to declare the chair vacant is not in order. However, a motion can be made to *Suspend the Rules* so as to take away from him the authority to preside during all or part of a given session.<sup>5</sup> When such a motion is made and seconded, after stating the motion he must turn the chair over to another following the procedure described in 43:29, and the remedy for refusal or failure to do so is that the motion may be put to a vote by its maker.

**No. 23-0127**

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**In the Supreme Court of Texas,  
Austin, Texas**

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In Re:

The MoCo Precinct Chair Group, et al.,  
Relators.

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**Petition for Writ of Mandamus  
Appendix II**

II. Business Records

Exhibit 5. John Wertz - MCRP Exec. Comm. Communications Declaration

- 5-1 July 12, 2022 Christ Email Notice for Mtg
- 5-2 July 12, 2022 Wertz Email Prop. Bylaws
- 5-3 July 15, 2022 Wertz Email Prop. Bylaws Follow up
- 5-4 July 19, 2022 Wertz Prop. Agenda
- 5-5 RPT Org. Mtg. Memo
- 5-6 July 19, 2022 Org Meeting Minutes
- 5-7 July 21, 2022 Walker Email Notice for Mtg
- 5-8 July 21, 2022 Walker Call for Mtg
- 5-9 July 21, 2022 Byers Email Notice for Mtg
- 5-10 July 21, 2022 Byers Call for Mtg
- 5-11 July 21, 2022 Christ Statement
- 5-12 July 23, 2022 Mtg Roll Call
- 5-13 July 20, 2022 Vance Email Notice for Mtg
- 5-14 July 25, 2022 Vance Call for Mtg
- 5-15 July 30, 2022 Tibbs Call for Mtg
- 5-16 July 30, 2022 Byers Call for Mtg
- 5-17 August 13, 2022 Mtg Minutes

- 5-18 August 13, 2022 Mtg Roll Call
- 5-19 August 13, 2022 Mtg Minutes (2)
- 5-20 August 13, 2022 Vacancy Report
- 5-21 September 6, 2022 Byers Call for Mtg
- 5-22 September 6, 2022 Mtg Minutes
- 5-23 September 6, 2022 Mtg Roll Call
- 5-24 September 6, 2022 Mtg Minutes-Amended
- 5-25 September 6, 2022 Resolution Aug. 13 Mtg Invalid
- 5-26 September 6, 2022 Resolution to Revoke PEC
- 5-27 September 6, 2022 Resolution to Compel
- 5-28 September 9, 2022 SoS FOIA Results
- 5-29 December 6, 2022 Resolution to Censure
- 5-30 December 6, 2022 Mtg. Call
- 5-31 December 6, 2022 Mtg. Minutes
- 5-32 January 3, 2023 Mtg Agenda
- 5-33 January 3, 2023 Mtg Minutes
- 5-34 January 3, 2023 Mtg Roll Call
- 5-35 January 3, 2023 Resolution No Confidence
- 5-36 January 3, 2023 Vice Chair Report
- 5-37 January 3, 2023 Vacancy Report
- 5-38 June 7, 2022 Ann Kate Resignation Email

Exhibit 6 - Matthew Patrick - Mediation Memorandum

Exhibit 5 also authenticates the following documents provided in App. I:

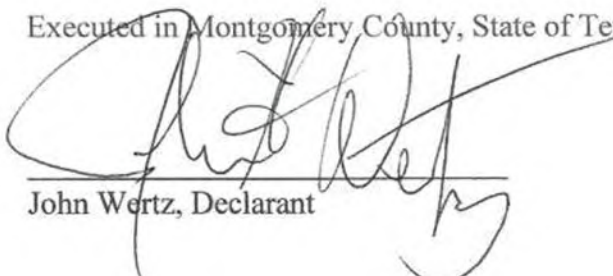
- Exhibit 2. Rules, Republican Party of Texas
- Exhibit 3. Montgomery County Rep. Party Exec. Comm. Bylaws (“Old Bylaws”)
- Exhibit 4. Excerpt, Robert’s Rules of Order, Newly Revised, 12<sup>th</sup> Ed.

**DECLARATION FOR AUTHENTICATION OF BUSINESS RECORDS**

My name is John Wertz, my date of birth is [REDACTED] and my address is [REDACTED]  
[REDACTED]. I declare under penalty of perjury that the following statements are within my personal knowledge and true and correct.

1. I make this declaration as the Republican elected chair of precinct 69 in Montgomery County, and active member of the Montgomery County Republican Executive Committee, to which all elected Republican precinct chairs belong, as well as all those who are appointed by that organization to fill vacancies when no person was elected during the Republican Primary.
2. I am the custodian of my records concerning this dispute, which includes election calls, the emails through which those calls were sent, minutes of the meetings, emails sent to me from various people who are identified on these records, and documents concerning these meetings, of which I have personal knowledge by observing the document in question or receiving it from the apparent author.
3. As the custodian of these records, I am familiar with the manner in which they are created and maintained by virtue of my duties and responsibilities as a custodian of my records as the Republican chair of precinct 69.
4. Attached are 187 pages of records, which are exact duplicates of the records that I received.
5. The records were made at or near the time of each act or event set forth in the record, which I created for my own records and to be able to explain what is happening to my constituents or any other interested persons who wish to learn of these events.
6. I keep these records in the course of regularly conducted business activity, as it is my regular practice as a member of the Executive Committee to make and keep a record of my activities.

Executed in Montgomery County, State of Texas, on February 12, 2023.

  
John Wertz, Declarant

From: **Bryan Christ** <[bryan4mcrp@gmail.com](mailto:bryan4mcrp@gmail.com)>  
Date: Tue, Jul 12, 2022, 5:58 PM  
Subject: Notice of CEC Organizational Meeting  
To:


All Pct Chairs,

This is the official meeting call for the 2022-2024 CEC Organizational Meeting to be held on July 19th at 6:30p at the Sadler Building. Attached you will find the agenda for the meeting and the proposed bylaws. The proposed bylaws are the collective product of the 5 workshops that many of you participated in. The sharing of ideas and collaboration was wonderful!

The proposed bylaws represent one of many possibilities. ***Where there was significant debate, variations have been captured in a separate doc.*** This doc will be circulated soon as a set of possible amendments (which we called options) during the workshops. ***We will walk through the proposed bylaws and apply these options through the amendment and voting process.***

--

Bryan Christ  
MCRP Chairman

**From:** John Wertz Isutigah@comcast.net   
**Subject:** MCRP 2022-2024 Proposed Bylaws submittal by the MCRP Freedom Caucus....  
**Date:** July 12, 2022 at 6:00 PM  
**To:** John Wertz Isutigah@comcast.net

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Good Day!

After much discussion during the Bylaw workshops, the precinct chairs of the Montgomery County Republican Party Freedom Caucus come now to propose updated bylaws (a Clean copy and a Working, marked-up copy compared to 2020) for next Tuesdays' (7/19) Organization Meeting. We believe these represent the entire body and maintains transparency & accountability.

In crafting these bylaws, we were mindful to be consistent with the Republican Party of Texas (RPT) Rules as to eliminate any conflicts which may be caused by interpretations of any perceived inconsistencies. An index has been included to help easily navigate through the document.

We advocate for "bottom-up" grassroots representation, which starts with our Precinct Chairs bringing the voices of their constituents to the Republican Party to stand for the values of the people and what is important to them.

We also believe that with the checks & balances and respect for the RPT rules, these bylaws will continue providing us with a firm foundation upon which to operate for this biennium and thus represent the best opportunity to achieve party unity.

And finally, the party has enjoyed unparralled success in get-out-the-vote and fundraising efforts. In November 2020, the Steering Committee prepared and mailed a slate of candidates to 85,000 households(over 100,000+ voters), printed out over 25,000 push cards and texted 35,000 the day before the election to those who hadn't voted. That had never been done before! The county turnout rate (population increase included) was the highest ever, with GOP success up and down the ballot! In addition, the fundraising committee by virtue of events such as the Luau, Golf Tournament/s and GALA not only increased involvement by new participants in our party but buoyed our bank account to a very solid \$54,409 as of 6/30/22(also attached).


Thank you for your consideration and continued support and we look forward to working together under these updated bylaws in the next (2022-2024) biennium.

Respectfully,

Montgomery County Republican Party Freedom Caucus Precinct Chairs  
*(Our Freedom Caucus Mission Statement, Pledge and Rules are also attached).*

2022-2024	2022-2024	Sunflower	FC Mission
MCRPT...N.PDF	MCRPT...aft.pdf	Balanc...22.pdf	Statem...-21.pdf



**From:** John Wertz Isutigah@comcast.net   
**Subject:** MCRP 2022-2024 Proposed Bylaws submittal by the MCRP Freedom Caucus....  
**Date:** July 15, 2022 at 7:44 AM  
**To:** John Wertz Isutigah@comcast.net

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Mr. Chairman:

It's now 2-1/2 days after I sent proposed bylaws(via email, per [RPT Rule 8e](#) below), on behalf of the Freedom Caucus(FC), to you and to the [executive committee](#) at the required number of days(7) prior to the upcoming Tuesday (7/19) Organizational Meeting.

But as of yet the FC bylaws have not been posted on our [website](#). I also asked you to forward our bylaws to the executive committee and to my knowledge, this has not been done either. Can you please provide an explanation as to why?

*In accordance w/[RPT Rule 8e](#) "....a copy of any proposed bylaws and/or Rules shall be mailed via USPS(or emailed, but only if the [precinct chairs email address is known](#)) and shall be posted on the county party website... Delivery will be to the last known address to the members of the executive committee at least 7 days prior to the meeting...."*

As well, several of us {myself(69), Sue Carranza(49) nor Wayne Pearson(52)}, that I'm aware of, did not receive your initial email containing your (or your groups - aka the Independent Alliance - whatever that is) bylaws. Wasn't in our spam either. Upon notification that yours had been sent but I hadn't received it, I asked you to resend yours to me(which you did later that evening) and to also please forward ours to the executive committee, which you haven't, as noted above).

In the name of full transparency, I ask that you fulfill the requirements of RPT Rule 8e and send the FC bylaws out, as well as posting them on the MCRPTX website.

Thank you.

John Wertz  
 Treasurer  
 Montgomery County Republican Party

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**From:** John Wertz [mailto:Isutigah@comcast.net]  
**Sent:** Tuesday, July 12, 2022 6:01 PM  
**Subject:** MCRP 2022-2024 Proposed Bylaws submittal by the MCRP Freedom Caucus....  
**Importance:** High

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2022-2024	2022-2024	Sunflower	FC Mission
MCRPT...N.PDF	MCRPT...aft.pdf	Balanc...22.pdf	Statem...-21.pdf

MCRPTx Organization Meeting  
Freedom Caucus Amended Agenda  
Tuesday, July 19th, 2022 6:30pm

1. Call to Order
2. Invocation
3. Pledges
4. Roll Call
5. Approval of Agenda
6. Oath of Office
7. Treasurer's Report
8. Adoption of Bylaws (Freedom Caucus) - Roll Call Vote
9. Elections of Officers (including other members of the Steering Committee, as well as Vacancy & Victory Committee Chairs) - Secret Ballot
10. New Business - Discussion of Appointees (Pct. 72, 92, 94, 98, 103 & 104)
11. Adjourn at the completion of this agenda.



## Organizational Meeting Memo

There are four required County Executive Committee (CEC) meetings you must hold as County Chair per year. The first is the Organizational Meeting. Below outlines the requirements of the Organizational meeting specifically and also information for meetings in general.

### Timing

- You must call an organization meeting to be held between June 13<sup>th</sup> (the first day new officers take office) and July 28<sup>th</sup>. (RPT Rule 8d & Texas Election Code 171.022 (c))
  - NOTE: Cannot be held during the Republican National Convention July 18<sup>th</sup> – 21<sup>st</sup>.

### Notice

- Notice of the meeting must be sent by hard copy through the **US Postal Mail** to all members of the executive committee. It must be mailed to their last known address 14 days PRIOR to the date of the meeting.
  - CANNOT BE EMAILED
- The in accordance with RPT Rule 8d the notice must include:
  - State time
  - Date
  - Location of the meeting
  - Name(s) of the person calling the meeting
  - Agenda
  - Copy of the proposed bylaws/rules for the biennium

### Agenda

- The agenda must include passing the bylaws/rules for the biennium.
  - Send a copy of the final passed bylaws to RPT.
- See the Sample Agenda

### Bylaws

- You must pass bylaws for your county party.
  - Even if they are exactly the same, and it may even be the same individuals serving in the CEC – you STILL MUST pass your county party bylaws.
- Bylaws should outline how County Party Officers, outside of the County Chair, are selected.
- Sample bylaws are attached.
  - I would highly suggested to skim through as there are some new updates based on changes in State Law & Party Rules.

### Officers

- Local party officers do not have to be precinct chairs. However ONLY the County Chair and precinct chairs are eligible to vote on statutory matters. Therefore if an officer is

also a precinct chair they are allowed to vote, but only once in their capacity as precinct chair.

- Secretary
  - You do need to select a county party secretary.
  - There is no technical deadline by which this action must happen but is a good housekeeping rule to take care of it as this meeting.
  - The Secretary is recognized by state law in certain instances to act on behalf of the county chair when authorized by the chair. If the county chair were to resign the secretary is the person charged with calling the meeting to fill the vacancy.
- Treasurer
  - Depending on the size of your county party this position might be more time consuming and tedious. Larger counties that have a combined income and expenses over several thousands of dollars may be required to send in reports to the Texas Ethics Commission (TEC) or the Federal Election Commission (FEC).
- Vice Chair
  - State law does not recognize authority of a Vice Chair. This does not preclude you having a Vice Chair and there are other duties that this person can assist with.

#### **Filling Precinct Chair Vacancies**

- A county executive committee shall, by majority vote at its organizational meeting, adopt a bylaw and/or rule for filling vacancies on the county executive committee. (RPT Rule 8h)
- The County Executive Committee (CEC), which is comprised of the County Chair and precinct chairs, or if no precinct chairs exist the county chair constitutes the CEC, may appoint/approve the nomination of anyone who meets the two requirements to fill the position of precinct chair.
  - The person must live in the precinct and be affiliated with the Republican Party.
    - Either by voting in primary or runoff, election or by taking an oath of affiliation
      - So if someone lives in the precinct but voted in the Democrat primary or runoff they are ineligible.
- Many counties do have a process or even committee in place to fill vacancies but this is not required.
  - Often it is outline in the county party bylaws.
- There was confusion over the requirement to take an oath. Party officers are not required to take an oath, however if you would like to do so there is an example attached.

#### **Executive Committee Meeting Quorum** (RPT Rule 9)

- Non-Statutory Business and Filling Vacancies (RPT Rule 9a)
  - At County or District Executive Committee meetings, one-fourth (1/4) of the membership, excluding vacancies, shall constitute a quorum for conduct of non-statutory business.

- Statutory Business (RPT Rule 9b)
  - A quorum for conduct of statutory business (called for by the Texas Election Code) shall consist of those members present.

### **Open Meetings**

- All meetings of the CEC are open meetings. (RPT Rule 8f)
  - Even at open meetings attendees who are not part of the CEC are not allowed to speak unless given permission when called upon by the chair.
- You do have the option to go into executive session which means only members of the CEC and other deemed necessary for the purpose of the meeting would be allowed in the room.

### **Updating Contact Information**

- At any time if officers or precinct chairs are elected to fill vacancies please forward their contact information to RPT. (RPT Rule 8g)
  - You will be sent a spreadsheet of precinct chairs from your county who we have on file at the moment. Please make any updates or changes throughout the year on that spreadsheet and email them back to RPT.

Please let me know if you have any additional questions. I know this is a long email but hopefully it is informative without being overwhelming.

Thank you for your service and good luck on your organizational meeting!

Cassie

### **Rule No. 8 – Supplementary Executive Committee Rules – Meetings**

- a. Compliance Required – The SREC, each county executive committee, each district executive committee, and any committee or sub-committee created by any Bylaws or Rules adopted by same, shall comply with and be established in accordance with these Rules.
- b. Supplemental Rules Permitted – The SREC elected at the biennial State Convention or a county executive committee elected in biennial primary election or a district executive committee created pursuant to the TEC or the bylaws of any political subdivision within the Party, may adopt supplemental rules or bylaws, provided however that such rules or bylaws do not conflict with any rules or bylaws of a higher authority including, but not limited to, these Rules. All such rules and bylaws shall be filed with the SREC and with the Secretary of State and are hereby adopted by reference.
- c. Organizational Meeting of the State Republican Executive Committee – The SREC shall hold its organizational meeting after the adjournment of the biennial State Convention. The agenda of the organizational meeting shall include, but not be limited to the adoption of Bylaws and/or Rules for the biennium. SREC Bylaws or Rules shall always be amendable by a majority of the entire membership, subject only to adopted notice requirements.
- d. **Organizational Meeting of a County Executive Committee** – A County Executive Committee shall hold its organizational meeting within forty-five (45) days after the

term of office begins for the County Chairman and the Precinct Chairmen. (The term of office begins twenty (20) days after the Primary Runoff Election according to Subsection 171.022 (c) of the TEC.) The County Chairman shall be responsible for calling the meeting however, if the County Chairman does not call the meeting, then one-fourth (1/4) or 50 of the Precinct Chairmen whichever is fewer, may, by written demand, call an organizational meeting. Notice of the organizational meeting shall be mailed by USPS to the last known address of the members of the executive committee at least fourteen (14) days prior to the date of the meeting and such notice shall state the time, date, and location of the meeting and the names(s) of the person(s) issuing the call. The agenda of the organizational meeting shall include, but not be limited to, the swearing in of the newly elected executive committee members and the adoption of Bylaws and/or Rules for the biennium. The proposed Bylaws and/or Rules shall be sent out with the meeting call via USPS at least fourteen (14) days prior to the date of the meeting.

- e. **Limitations on County Executive Committee Meetings** – No county executive committee meeting shall be held during the week of the biennial State Convention or the quadrennial National Convention.
- f. **Open Meetings and Right to Testify** – All meetings of any State or County Executive Committee or its committees, subcommittees, or ad hoc committees shall be open to any member of that executive committee, and they shall have the right to appear before any such committee, subcommittee, or ad hoc committee and make recommendations for the committee's consideration or testify concerning any item under purview of the committee and to record the proceedings of any meeting not held in executive session with electronic devices. The committee may adopt reasonable rules including time limits for such presentations and may establish a reasonable limit of time for these presentations. This Rule does not preclude the committee from going into executive session; however, such executive session(s) shall be open to any member of the executive committee including ex-officio members.
- g. **The County Chairman shall maintain a current list** of the name, mailing address, phone number, email address (if available), and precinct number of every Republican Precinct Chair who was elected in the Primary, the Primary Runoff, or was appointed by the County Executive Committee to fill a Precinct Chair vacancy. The list shall be updated within seven (7) business days of an election changing the status of the list and shall be made available at reproduction costs or by email to any Republican Precinct Chair, Republican Party Official, Republican Elected Office Holder, or Republican Candidate for Elective Office of the county requesting such.
- h. **Filling Vacancies on a County Executive Committee** (Permanent State Executive Committee Rule) – A county executive committee shall, by majority vote at its organizational meeting, adopt a bylaw and/or rule for filling vacancies on the County Executive Committee.

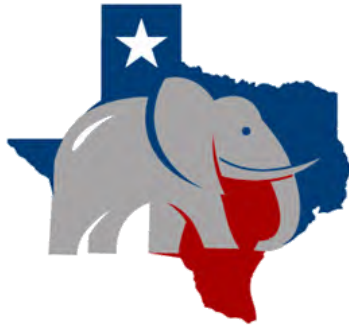
#### Rule No. 9 – Executive Committee Quorum

- a. **Non-Statutory Business and Filling Vacancies** – At County or District Executive Committee meetings, one-fourth (1/4) of the membership, excluding vacancies, shall constitute a quorum for conduct of non-statutory business. As provided by Section 171.024(c), TEC, the SREC has designated one-fourth (1/4) of the membership, excluding

vacancies, or such greater percentage, not to exceed a majority of the membership, as may be specified in County Executive Committee Bylaws and/or Rules as the quorum for filling vacancies on County Executive Committees (Permanent State Executive Committee Rule). At SREC meetings, the quorum for conduct of non-statutory business shall be in accordance with the SREC Bylaws. If the quorum provided above is not present at any executive committee meeting, then only statutory business (called for by the TEC) may be transacted at a meeting.

- b. Statutory Business – At SREC, County or District Executive Committee meetings, a quorum for conduct of statutory business (called for by the TEC) shall consist of those members present.





**MONTGOMERY COUNTY**  
**REPUBLICAN PARTY**  
— of Texas —

**Montgomery County Republican Party**  
County Executive Committee Organizational Meeting Minutes  
Alan Sadler Commissioner's Court  
July 19, 2022 at 6:30 p.m.

**Call to Order**

Bryan Christ calls meeting to order at 6:30 pm

John Wertz moves that agenda is substituted by Freedom Caucus agenda

- Bryan Christ indicates it is out of order

**Roll Call**

Raquel Lewis calls roll

- 69 are present
- We have a quorum

**Approval of Agenda**

John Wertz motions to amend agenda

- Moves to substitute agenda with Freedom Caucus agenda
- Kim Weber seconds

Bryan Christ indicates it requires a 2/3 vote

- Bryan Christ calls recess while conferring with parliamentarian
- Bryan Christ calls meeting back to order at 6:43 pm
- Amending the agenda requires only a majority vote

Scott Baker raises a point of information. Susan Johnson raises a point of information. James Byers raises a point of information.

Bryan Christ confers with parliamentarian

- Bryan Christ indicates that motion to substitute agenda is out of order
- The MCRP do not currently have a treasurer
- There are office holders outside our bylaws

Bryan Christ would entertain an amendment to the amendment

- John Wertz appeals the decision of the chair

Dale Inman raises a point of information

- James Byers indicates that is not a point of information
- Bryan Christ answers, John Wertz is still on file as treasurer

Scott Baker raises a point of information

- Do we de-facto adopt the Freedom Caucus bylaws?
- Bryan Christ answers, Yes

James Byers raises a point of order

- There is a motion to appeal the chair
- Violation of RPT rules?

Bryan Christ requests that SREC members approach the bench

James Byers raises a point of order

- Correct process for precinct chair to approach, must request approach and announce
- Bryan Christ asks John Wertz to be seated
- Bryan Christ confers with SREC members
- Bryan Christ calls the meeting back in order

Bryan Christ indicates he has to deal with items in a certain order

John Wertz appealed the decision of the chair

- Bryan Christ asks if he would be agreeable to recall based on agreement of prior biennium treasurer

Raquel Lewis raises a point of information

Adrian Kaiser raises a point of information

- There is still a motion on the floor to amend the agenda with a substitution

Scott Baker speaks against the motion (1)

George Hyde raises a point of order

- People are to address the chairman and not the body

Quentin Smith speaks for the motion (1)

- We did not talk about the agenda in the workshops

DJ Fike raises a point of personal privilege

- Silence phones

Anna Greathouse raises a point of information. "Who are the members of the Freedom Caucus?"

DJ Fike speaks for the motion (2)

James Byers raises a point of information

1. Would you explain who the freedom caucus is?
2. What is included in #9
3. What is included in new business
  - Bryan Christ cannot answer the first question
  - For #9, is it limited just to the two named committee chairs
  - For new business, other things can be conducted in new business

Dale Bible speaks against the motion (2)

Robert Walker raises a point of information. Becky Vance raises a point of order "Are we not talking about the agenda, not the bylaws at this time?" Bryan Christ indicates that discussion needs to be regarding the agenda. Becky Vance raises a point of order. "We are talking about the agenda and the approval of the agenda" Not germane. John Wertz raises a point of information

Anna Greathouse speaks against the motion (3)

Susan Johnson raises to speak against the motion [We are currently under Robert's Rules which has no limit]

Ken Earnest calls the question

- Not recognized
- Susan was recognized previously
- Bryan Christ indicates that anyone wishing to be recognized must raise after the previous person

Susan Johnson speaks against the motion (4)

Allison speaks for the motion (2)

Dale Iman motion to call the question. Motion seconded. Takes 2/3 vote. Motion to end discussion passes. Vote on the original motion to amend the agenda

DJ Fike raises a point of information: What is the substitution

James Byers calls for division of the question, Seconded. Bryan Christ explains what a division of the question is. Cathie Locetta raises a point of order, Doesn't think dividing is correct. Fred Sundermann raises a point of information, Encourages the chair to enforce decorum. Bryan Christ explains decorum. Glenn Speight requests a roll call vote. John Wertz raises a point of information: Can you please explain the division of the question? Bryan Christ allows James B to speak on the division. James would be agreeable to include just the items that are not on the original agenda. Adrian Kaiser raises a parliamentary inquiry: Is division in order? Bryan Christ indicates that the roll call request is in order.

Bryan Christ confers with the parliamentarian

Sue Carranza raises a point of personal privilege: Too loud. George Hyde refers to Robert's Rules: We are discussing division of the question, not the assembly. Adrian Kaiser requests clarification Roll call vote is for division? Parliamentarians speaks that is related to all votes regarding the division of the question. DJ Fike raises a point of information. What are we debating? Bryan Christ indicates that a call for a roll call vote does not need a second and it is not debatable Vote will be done by roll call. We are going to take a vote on dividing the question. John Wertz raises a point of information. Answer: Divide the question by majority. Point of personal privilege

No one can hear. Fred Sundermann raises a point of information: Why would his amendment not be in order. Answer: Motion is not amendable. John Wertz raises a point of information: Can you please explain what a vote yes would be for and what a vote no would be for?

Steve Lawrence raises a point of order: Need to include #11. Bryan Christ indicates that the person who called for division would be the person that makes that decision. Robert Walker raises a point of information: #11 appears to be different. Bryan Christ doesn't control what is included. James Byers would need to clarify. James indicates that items are #7 through #10. Robert Walker indicates that the numbers were not originally included. Answer: It is up to James B. Dale Inman raises a point of information: "Numbers 7, 8, 9, 10?"

Dennis Tibbs raises a point of information

If we vote to divide, does that mean they go to the top of the list, are they deleted, what does it mean?

Bob Coats raises a point of order: Call the question should have stopped everything else.

Bryan Christ explains the difference between calling the question and division of the question.

Bryan Christ indicates that if adopted, these amendment items would fall in after oath of office.

Cathie Locetta requests to approach the bench for a parliamentary inquiry. We can move forward by voting on this stuff. Bryan Christ explains what voting yes and voting no does.

Parliamentarian speaks regarding the temperature in the room

Fred Sundermann raises a point of information: "Explain the difference between earlier roll call and current role call"

Raquel Lewis takes roll: No = 52, Yes = 26. No's have it for a call for division. We will not be dividing the question

Robert Walker raises a point of information. Fred raises a point of information: Question was called, correct? Answer: Yes. Motion to substitute on the floor for the agenda. Scott Robbins raises a point of information: Call the question was already taken. Glenn Speight requests roll call vote. Adrian Kaiser raises a parliamentary inquiry. We don't know what the division will be. Answer: We were getting ready to vote, so this is appropriate

Raquel Lewis Lewis raises a point of information: We are still in the motion to amend the agenda. Ken Earnest raises a point of information: A no vote is to keep the original agenda? Answer: Yes. James Byers raises a point of information. If motion to amend is passed, does that mean the bylaws are also substituted? Answer: It just means that is the line item on the agenda. Cathie Locetta raises a point of information: Have we already had discussion? Answer: Yes. Kristin Plaisance raises a point of information: Are we switching to the freedom caucus bylaws will be used and not the original bylaws? Bryan Christ indicates that we have to start off with the freedom caucus bylaws. Motion is to substitute agenda. John Wertz requests to approach the bench. Please explain which agenda we are voting on

Raquel Lewis calls roll: Yes = 47, No = 31. Motion passes. John Wertz requests outcome of vote

Any other amendments? Scott Baker moves to amend the bylaws to strike the word Freedom Caucus from item 8. Seconded. No discussion. Vote: Not discernable. Standing vote, Yes = 32 No = 42. No's have it. Motion fails.

Adrian Kaiser raises a parliamentary inquiry: Was a sergeant at arms appointed? Answer: Yes, running late. Fred Sundermann calls the question. Seconded. Scott raises a point of order, there is no motion. Fred Sundermann indicates he calls the question for amending the agenda. Bob Coats motions to adopt the agenda as amended. Seconded. Steve Lawrence raises a point of information. DJ Fike raises a point of information. Please clarify the motion currently in order

Any objection to adopting the amended agenda? No, agenda adopted

James Byers raises a point of order. Dale Inman raises a point of personal privilege, "can James go to the microphone". James indicates it is very difficult for him to walk. James indicates the purpose of the meeting's amended agenda is different from the original agenda. Bryan Christ indicates the point of order is in line. Fred raises a point of information: We voted as the CEC not the freedom caucus.

Bryan Christ stands the meeting at ease while he confers with the parliamentarian

Adrian Kaiser raises a point of information: Can we entertain a motion for a 20-minute recess, 10-minute? Adrian Kaiser motions for a 10-minute recess. Seconded. Meeting is called to recess at 8:08 pm. Bryan Christ addresses the body to indicate we are still at ease

Bryan Christ calls the meeting back to order at 8:30 pm

Bryan Christ explains the current circumstances. The Freedom Caucus agenda is in question. There is a remedy. Robert Walker raises a point of information, "Can you please point out where the title matters?" Bryan Christ finishes his statement. Robert Walker requests the specific item that is in question. James Byers raises a point of order: "No one has the standing to question how the chairman comes to a decision" Bryan Christ stated Adrian Kaiser can raise a motion to reconsider. James Byers raises a point of order, a motion to reconsider cannot be addressed in the same session.

Ken Earnest raises a point of information: "Is the chairman and Parliamentarian supposed to be neutral?" Answer: Yes. Ken Earnest requests that the parliamentarian surrender his phone. James Byers raises a point of order, not in order. Ken Earnest indicates that the parliamentarian may not be neutral.

Fred raises a point of information: "Can the Chair rule that the title and other issues with the agenda included errors?" Parliamentarian answers the questions.

Bryan Christ calls the meeting at ease for five minutes at 8:37 pm

Bryan Christ addresses the body, still at ease, at 8:43 pm

Bryan Christ calls the meeting back to order at 8:45 pm

Bryan Christ indicates he is disagreeing with James Byers that was referring to a motion to renew. A motion to reconsider is in order. Must be offered by someone who originally voted for the agenda. Bryan Christ entertains a motion to reconsider. You must be in the prevailing side

Fred introduces a motion to reconsider. Seconds. Linda Stuckey raises a point of order: Confirm how Fred voted. Scott Robbins raises a point of order" Vote is backwards. Bryan Christ recites Robert's Rules. Must have voted yes, and be willing to change to no to introduce a motion to reconsider. Fred requests that respect is considered for everyone. Raquel Lewis confirms that Fred voted yes. Ken Earnest raises a point of information: We just have a motion to reconsider, to place the document back before the body to vote again, with the intent to amend the title to clarify. Ken Earnest raises a point of information: Can we have a motion to reconsider just for the title? Answer: Not in order. John Wertz raises a Point of Information:

What precludes us from voting on this? Can we just amend the title? Answer: The reason is that it is a previously disposed of question. Robert's Rules only has 2 mechanisms to cover, motion to renew (subsequent session), or motion to reconsider (same session)

Fred raises a Point of Information: Chair did not conclude that this can be treated as clerical error, must be non substantive. Allison raises a Point of Information: Can we amend the agenda with 2/3 vote to change the title? Bryan Christ confers with the parliamentarian. Bob Coats raises a Point of Information. Bob Coats requests to approach the bench. Bryan Christ and parliamentarian review rules.

James Byers raises a Point of Order: Everyone must be seated first, then raise and be recognized. James Byers raises a Point of Order: One person must raise to be recognized, not two people. James Byers raises a Point of Order. Bryan Christ permits both to address the chair. Ken Earnest and John Wertz approach the bench. James Byers requests to approach the chair. James Byers approaches the bench. Bryan Christ requests that everyone be seated.

Laurie Clifton raises a Point of Information: Questions regarding the freedom caucus. Dennis Tibbs raises a Point of Information: What is the real objection to the agenda? Is it the title or the freedom caucus? Answer: Bryan Christ explains that the agenda indicates it is for the freedom caucus. Robert Walker raises a Point of Information: Lots of noise. Fred raises a Point of Order: Robert's Rules and RPT rules have time limits for discussion. Answer: Only apply for conventions. Neda Henery raises a Point of Information: The discussion for the title should have been handled previously during discussion. Robert Coats motions: Out of order, we already have a motion on the floor. Need to dispose of his motion. Fred Sundermann disposes of his motion. Robert coats motions to amend, To replace language to read in confines of the RPT language We reaffirm the vote. Bryan Christ indicates that Robert can motion to amend what was previously adopted (2/3 vote). Instead of language regarding Freedom Caucus replace with Montgomery Executive Committee and strike language in first part of Freedom Caucus Seconded. Becky Vance raises a Point of Order. Motion seconded. Robert Coats Calls to Question. Robert Walker raises a Point of Information: Clarification for just replacing the title from Freedom Caucus to Montgomery County Executive Committee. Strike second line in title Freedom Caucus to Montgomery County Executive Committee Agenda. Answer: Cannot call the question if not recognized. Scott raises a Point of Information: Would Bob be willing to remove Freedom Caucus from line 8 as well? Are you offering an amendment to the motion? Answer: Yes. Robert Walker raises a Point of Order, "If something is passed, can you amend it again?" Bryan Christ clarifies that Bob Coats is changing the title. Scott has introduced an amendment to strike Freedom Caucus from #8. Seconded by Mark Frank. Robert Walker raises a Point of Order" It is in order. Need 2/3 vote. Amendment to amendment only needs a majority. Discussion about the amendment to the main motion. Steve Lawrence requests roll call

Bryan Christ clarifies, the vote is to the amendment to the main motion. Amendment to the main motion is to remove Freedom Caucus from #8. Ken Earnest raises a Point of Information: Do we start over? Answer: No, just change Bob Coats amendment. Fred raises an amendment to the amendment to motion. Dale Inman raises a Point of Order: Can only have an

amendment to amendment. Are you introducing a vote to amend the amendment? Fred  
 Answers: Yes. Fred motions to strike Freedom caucus from amendment, replace with 2022-2024  
 MCRPTx bylaws proposal presented by John Wertz, Precinct 69. Seconded. Scott raises a point  
 of privilege. Withdraws amendment to amendment.

Back to Bob Coats main motion. James Byers raises a Point of Information. Motion to reconsider  
 can be followed by a motion to reconsider. Fred motions to amend Freedom caucus with  
 2022-2024 MCRPTX bylaws proposal presented by John Wertz, Precinct 69. Seconded. John  
 Wertz raises a Point of Information: Please restate motion to amend. Anna Greathouse raises a  
 Point of Information: What are we voting on? Answer: We are voting on the amendment to the  
 main motion. Dennis Tibbs raises a Point of Information: "We are talking about the Freedom  
 Caucus in the middle of the page". Cathie Locetta raises a Point of Information. Bryan Christ  
 clarifies. Fred clarifies. Ken Earnest raises a Point of Information: Is there any objection to the  
 wording? Bob Coats raises a Point of Information: How can he incorporate Fred's amendment in  
 his original motion? Answer: Fred should withdraw his amendment, then Bob Coats can  
 amend. Fred withdraws his amendment. Bob Coats speaks to his motion. Bob changes his  
 original motion to stating striking Freedom Caucus and replacing with 2022-2024 MCRPTX  
 bylaws proposal presented by John Wertz, Precinct 69. Seconded. SREC Member Tom Nobis  
 raises a Point of Information: Is this replacing the motion?

Fred restates Bob's motion to change item #8 to replace the title with MCRPEC for Freedom  
 Caucus. Seconded. Remember it takes 2/3 vote. Dennis Tibbs raises a Point of Information:  
 2/3 vote is only for subsequent meetings, not the organizational meeting. Motion to adopt that  
 which was previously adopted takes 2/3 vote. Dennis Tibbs approaches the bench. Dennis  
 confers with the chairman and parliamentarian. Judi Thomas raises a Point of Information:  
 Can we move on? Robert Walker calls the question. No further discussion. Motion that requires  
 2/3 vote. George Hyde raises a Point of Information: Bryan Christ clarifies the motion. Voice  
 vote not discernible. Standing vote required. Susan Johnson calls for quorum count.  
 John Wertz raises a Point of Information: What is the requirement for a quorum? Answer: Bryan  
 Christ confers with parliamentarians. Scott Baker recites it as those present in voting. No floor.  
 Motion of precedence for a roll call. Raquel Lewis will take roll call for those present. Sue  
 Carranza raises a Point of Information: Reiterates what we are voting on to change the title and  
 #8 in the agenda? Answer: Voting yes means the amendment is passed, Voting no means it does  
 not. Susan Johnson raises a Point of Information: What is being conducted now? Roll call only?  
 77 present. Dennis Tibbs raises a Point of Information: If this agenda doesn't pass, do we have  
 to go back and approve the other agenda?. Answer: There are 2 options, 1. We can go with the  
 original agenda, if approved 2. Default to the other agenda, if approved. George Hyde raises a  
 Point of Order: If 2/3 fails, could go a different route for simple majority. Ken Earnest raises a  
 Point of Information: Is chairman and parliamentarian okay with this wording? Answer: No issue  
 with change in language in both places

Robert Coats raises a Point of Order. Allison raises a Point of Information: Thought we were just  
 changing the title. Bryan Christ clarifies: Changing the document, Requires a 2/3 vote. Vote



indiscernible. Standing vote required. Results: No = 25, Yes = 49. Robert Walker raises a Point of Information: There are some that didn't vote. Answer: They are allowed to abstain.

Bryan Christ will stand meeting at ease while votes are calculated

Motion fails.

Fred raises a Point of Order: Motions that we adjourn. Seconded. Not debatable. Not amendable. Motion carries

Meeting adjourned at 9:49 pm

Items not addressed:

1. Invocation
2. Pledges
3. Oath of Office
4. Adoption of Bylaws

## Call for Emergency Meeting for the CEC - Saturday, July 23 @ 9am

Inbox

**Robert Walker** <[rw4mocotx@outlook.com](mailto:rw4mocotx@outlook.com)>

Thu, Jul 21,  
8:55 AM

to Bryan, Raquel

Mr. Chairman, Madam Secretary, and Precinct Chairmen

Pursuant to Article VI Section 2 of the bylaws, an emergency meeting has been called by Robert Walker and the undersigned Precinct Chairs.

The stated emergency is that we must reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment.

Please see the attached document with the agenda as well as the precinct chairs who have called for this meeting.

Robert Walker  
Precinct 87 Chair  
832-341-2917  
[rw4mocotx@outlook.com](mailto:rw4mocotx@outlook.com)

## NOTICE OF CALL OF EMERGENCY SPECIAL CEC MEETING

**Date/Time:** July 23, 9:00a.m.

**Location:** 1201 Lake Woodlands Dr., Suite 4020, The Woodlands, TX

**Meeting Type:** Emergency Special Meeting

**Stated Purpose:** Reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment.

**Called by:** Robert Walker, and the Precinct Chairs listed in the Notice

1. Call to Order
2. Invocation
3. Pledges
4. Roll Call
5. Approval of Agenda
6. Oath of Office
7. Treasurer's Report
8. Adoption of Bylaws (Freedom Caucus) - Roll Call Vote
9. Elections of Officers (including other members of the Steering Committee, as well as Vacancy & Victory Committee Chairs) - Secret Ballot
10. New Business - Discussion of Appointees  
(Pct. 72, 92, 94, 98, 103 & 104)
11. Adjourn at the completion of this agenda.

Meeting Called by:

1. Robert Walker, Precinct 87 Chair
2. Kenneth Earnest, Precinct 06 Chair
3. John Wertz, Precinct 69 Chair
4. D.J. Fike, Precinct 102 Chair
5. Allison Winter, Precinct 59 Chair
6. George Hyde, Precinct 100 Chair
7. Kristen Plaisance, Precinct 37 Chair
8. Steve Lawrence, Precinct 48 Chair
9. Kim Weber, Precinct 97 Chair
10. Dale Fessenden, Precinct 17 Chair
11. John Schluter, Precinct 44 Chair
12. Neda Henery, Precinct 108 Chair
13. Larry Rogers, Precinct 75 Chair
14. Juanita Simmons, Precinct 19 Chair
15. Melinda Olinde, Precinct 89 Chair
16. Dennis Tibbs, Precinct 76 Chair
17. Ginger Russell, Precinct 74 Chair
18. Donna McAleer, Precinct 61 Chair

19. Suzanne Rapitoni, Precinct 99 Chair
20. Scott Robbins, Precinct 33 Chair
21. Adrian Kaiser, Precinct 66 Chair
22. Betty Anderson, Precinct 31 Chair
23. Tammy Kelter, Precinct 35 Chair
24. Christina Lightfoot, Precinct 50 Chair
25. Luis Pedraza, Precinct 110 Chair
26. Theresa Haag, Precinct 68 Chair
27. Patricia Carr, Precinct 83 Chair
28. Dale Inman, Precinct 27 Chair, SREC SD-4 Committee Man
29. Kathryn Ross, Precinct 67 Chair
30. Paul Crowson, Precinct 36 Chair
31. Susan Carranza, Precinct 49 Chair
32. Susan Scruggs, Precinct 81 Chair
33. Kent Frappier, Precinct 2 Chair
34. Herschel Williams, Precinct 63 Chair
35. Ronnie Trojanowski, Precinct 73 Chair
36. Mark Pruitt, Precinct 84 Chair
37. Mark Fusca, Precinct 47 Chair
38. Torrey Bingham, Precinct 85 Chair
39. Catherine Locetta, Precinct 71 Chair
40. Gwen Withrow, SREC SD-4 Committee Woman

**From:** Bryan Christ <bryan4mcrp@gmail.com>  
**Sent:** Thursday, July 21, 2022 4:47 PM  
**Subject:** Fwd: Call for Emergency CEC meeting - Online

Precinct Chairs of the Montgomery County Republican Party County Executive Committee:

The following call has been issued in accordance with Article VI Section 2 of the enacted bylaws. Pursuant to the stated emergency clause thereof, James Byers has satisfied the (2) day requirement. Pursuant to RPT Rule 8j, I declare a stated emergency and electronic means of participation is hereby permitted in accordance thereof.

----- Forwarded message -----

From: **James Byers** <[byersjt@yahoo.com](mailto:byersjt@yahoo.com)>  
Date: Thu, Jul 21, 2022 at 4:36 PM  
Subject: Call for Emergency CEC meeting - Online  
To: Bryan CHRIST <[bryan4mcrp@gmail.com](mailto:bryan4mcrp@gmail.com)>

Pursuant to the Bylaws of the MONTGOMERY COUNTY REPUBLICAN PARTY OF TEXAS, **ARTICLE VI – Meetings, Section 2. Meeting Calls**

We, the undersigned MCRP Precinct Chairs (see attached Notice), call by written petition by more than 20% of the executive committee's total membership (not including vacancies). The stated emergency is our County Executive Committee's continued noncompliance with our biennium Bylaws for 2022-2024. The purpose of this meeting is to bring our Executive Committee in compliance with our Bylaws.

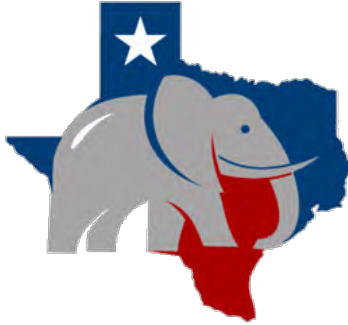
Time: 09:00 AM. July 23, 2022  
Place: Online and optionally, TWFG Insurance Offices, 1201 Lake Woodlands Dr., Suite 4020, The Woodlands, TX 77380

The agenda and signatories are attached.

[James Byers](#)  
(281) 300-0058

--

Bryan Christ  
MCRP Chairman



**MONTGOMERY COUNTY**  
**REPUBLICAN PARTY**  
of Texas

**NOTICE OF CALL OF EMERGENCY SPECIAL MEETING of Montgomery County Republican Party of Texas, referred to as the Executive Committee**

**Date/Time:** July 23, 2022, 09:00 AM

**Location:** Online and optionally, TWFG Insurance Offices, 1201 Lake Woodlands Dr., Suite 4020, The Woodlands, TX 77380

**Meeting Type:** Emergency Special Meeting

**Stated Purpose:** To complete business required by the enacted Bylaws.

**Called by:** James Byers, Precinct 24 Chair and the Precinct Chairs listed in this Notice

1. Call to Order
2. Roll Call
3. Invocation
4. Pledges
5. Administer Oath of Office for Precinct Chairs
6. Nomination and Elections of Officers
  - \* Vice Chair
  - \* Secretary
  - \* Treasurer
  - \* 5 at-large EC representatives for the steering committee.
7. Nomination and election of Victory 2020 committee chair
8. Nomination and election of Vacancy committee chair
9. Victory Committee
10. Legislative priorities committee
11. Adjourn

Meeting Called by:

Becky Vance, Precinct 18 Chair  
Dale Bible, Precinct 65 Chair  
Glenn Speight, Precinct 86 Chair  
James Byers, Precinct 24 Chair  
Annette Kerr, Precinct 91 Chair  
Laurie Clifton, Precinct 13 Chair  
Greg Long, Precinct 16 Chair

Chris Crawford, Precinct 53 Chair  
Katherine Rummell, Precinct 45 Chair  
Jamie Metts, Precinct 12 Chair  
Jeff Filbin, Precinct 38 Chair  
Matt Mitchell, Precinct 30 Chair  
Anna Greathouse, Precinct 22 Chair  
Linda Stuckey, Precinct 29 Chair  
John Webb, Precinct 90 Chair  
Raquel Lewis, Precinct 96 Chair  
Wendy Lynch, Precinct 25 Chair  
Wayne Long, Precinct 41 Chair  
Wesley Doolittle, Precinct 106 Chair  
Susan Johnson, Precinct 20 Chair  
Scott Baker, Precinct 23 Chair

## Statement from the Chairman

Bryan Christ <bryan4mcrp@gmail.com>

Thu 7/21/2022 5:50 PM

Precinct Chairs of the Montgomery County Republican Party County Executive Committee:

As of this email, two Precinct Chairs have issued calls for a special emergency meeting in accordance with Article VI Section 2 of the enacted bylaws. Both petitioners have satisfied the requirements thereof.

I have spent a significant portion of my day in phone correspondence with an attorney whose expertise includes the Texas Election Code, Robert's Rules of Order, and RPT Rules.

- The Organizational Meeting was properly adjourned on the evening of July 19th.
- As a result of adjournment, the bylaws from the previous biennium were previously enacted (RPT Rule 8e).
- Both petitioners have called for a special emergency meeting pursuant to Article VI Section 2 in accordance with the 2 day rule and have thereby acknowledged the enactment of the previous beinnium bylaws (2 days and 48 hours are legally distinct).
- When the meeting adjourned, and the previous bylaws were enacted, certain activities (such as electing officers, Article V Section 1 were impossible to fulfill for a body not convened).
- Pursuant to RPT Rule 8j, I have declared a stated emerged. The stated emergency is that we are no longer in compliance with our enacted bylaws and must convene to do so.
- In accordance with RPT Rule 8J, I will be permitting electronic voting at the meeting, and I will be providing details for that as soon as possible.
- Any proposed amendments to the bylaws will need to be done so in accordance with Article XIV of the enacted bylaws.

On a personal note...

All of this weighs heavy on me. This is not the outcome I had hoped for a few days ago. I'm very disappointed in how things have turned out. It was my adamant desire that we all had come together and worked together on some much needed changes. This is why I set up bylaw workshops with *everyone*. There are many flaws and inefficiencies in our previous bylaws that are now enacted that needed to be addressed. I also think debating the issues and creating bylaws is a great team-building experience. I strongly advise that we all come together in an unofficial meeting so we can work together unencumbered by Robert's Rules (which I believe can lead to squashing of healthy discussion) and figure out a way forward that the vast majority can agree on. A divided house cannot stand.

--

Bryan Christ  
MCRP Chairman



<b>PCT</b>	<b>CHAIR</b>	<b>1st Roll Call</b>	<b>2nd Roll Call</b>	<b>Roll Call Vote for ByLaws</b>
1	Barbara Ray	n	n	y
2	Kent Frappier	y	y	
3	Alex Chandel	y	y	
4	Nelson Reyes	n	n	
5	Doug Taylor	y	y	y
6	Kenneth Earnest	y	y	y
7	Rapunzel Myers	n	n	
8	Bill Kercheval	n	y	y
9	Quentin Smith	y	y	y
10	Mark Frank	n	n	
11	Marliese Stripling	n	n	
12	James Metts Jr.	n	n	
13	Laurie Clifton	y	y	
14	Danielle Walters	n	n	
15	Gary D. Reynolds	y	n	
16	Greg Long	n	n	
17	Dale Fessenden	y	y	y
18	Becky Vance	y	n	
19	Juanita G. Simmons	n	n	
20	Susan Johnson	y	y	
21	Alan A. Moore	n	n	
22	Anna Greathouse	y	y	
23	Scott Baker	n	n	
24	James Byers	y	n	
25	Wendy Lynch	n	n	
26	VACANT			
27	Dale Inman	y	y	y
28	Ken Walling	y	y	
29	Linda Stuckey	y	y	
30	Matt Michell	y	n	

<b>PCT</b>	<b>CHAIR</b>	<b>1st Roll Call</b>	<b>2nd Roll Call</b>	<b>Roll Call Vote for ByLaws</b>
31	Betty Anderson	y	y	y
32	Thomas L. Gardner	n	n	
33	Scott Robbins	y	y	y
34	Ken Allen	y	y	y
35	Tammy Kelter	n	n	
36	Paul Crowson	n	n	
37	Kristen Plaisance	y	y	y
38	Jeff Filbin	n	n	
39	Brady Walding	n	n	
40	Josh Graff	y	y	y
41	Wayne Long	n	n	
42	Alan Mallard	n	n	
43	Charlotte Belin	n	n	
44	John Schluter	y	y	y
45	Kat Rummell	n	n	
46	Yvonne Wunsche	n	n	
47	Mark Fusca	y	y	y
48	Steve Lawrence	y	y	y
49	Susan Carranza	y	y	y
50	Christina Lightfoot	y	y	y
51	Victoria Tompkins	n	n	
52	Wayne Pearson	y	y	y
53	Chris Crawford	y	y	
54	VACANT			
55	Sandra Mobley	n	n	
56	Srini Katta	n	n	
57	Terri Saxton	n	n	
58	Lana Hazlett	n	n	
59	Allison Winter	y	y	
60	Judi Thomas	n	n	

<b>PCT</b>	<b>CHAIR</b>	<b>1st Roll Call</b>	<b>2nd Roll Call</b>	<b>Roll Call Vote for ByLaws</b>
61	Donna McAleer	y	y	
62	VACANT			
63	Herschel Williams	y	y	y
64	Roy Jimenez	n	n	
65	Dale Bible	y	y	
66	Adrian Kaiser	y	y	y
67	Kathryn Ross	n	n	
68	Theresa Haag	y	y	y
69	John Wertz	y	y	y
70	Jack Munich	n	n	
71	Catherine Locetta	y	y	
72	Ann Kate	n	n	
73	Ronnie Trojanowski	y	n	y
74	Ginger Russell	y	y	y
75	Larry Rogers	y	y	y
76	Dennis Tibbs	y	y	y
77	Robert Coats	y	y	y
78	Keith Wagner	n	n	
79	Thomas Lancaster	n	n	
80	VACANT			
81	Susan Scruggs	y	y	y
82	Walter Simms	n	n	
83	Patricia Carr	n	n	
84	Mark Pruitt	y	y	y
85	Torrey Bingham	y	y	y
86	Glenn Speight	y	y	
87	Robert Walker	y	y	y
88	Frederick Sunderman	n	n	
89	Melinda Olinde	y	y	y
90	John Webb	n	n	

<b>PCT</b>	<b>CHAIR</b>	<b>1st Roll Call</b>	<b>2nd Roll Call</b>	<b>Roll Call Vote for ByLaws</b>
91	Annette Kerr	y	y	
92	VACANT			
93	Denise Ebert	n	n	
94	VACANT			
95	Trish Fahrenthold	n	n	
96	Raquel Lewis	y	y	
97	Kimberly Weber	y	y	y
98	VACANT			
99	Suzanne Rapattoni	n	n	
100	George Hyde	y	y	y
101	VACANT			
102	DJ Fike	y	y	y
103	VACANT			
104	VACANT			
105	Charlie Parada	y	y	
106	Wesley Doolittle	n	n	
107	VACANT '			
108	Neda Henery	y	y	y
109	Mike Medved	n	n	
110	Luis Pedraza	y	y	y
111	VACANT			
Yes		55	51	37
No		43	47	0

PCT	CHAIR	1st Roll Call	2nd Roll Call	Roll Call Vote for ByLaws
-----	-------	---------------	---------------	---------------------------------

**PCT**

**CHAIR**

**1st Roll Call**

**2nd Roll Call**

**Roll Call  
Vote for  
ByLaws**

PCT	CHAIR	1st Roll Call	2nd Roll Call	Roll Call Vote for ByLaws
-----	-------	---------------	---------------	---------------------------------

Yes  
No

54  
43

**Fwd: Call for Emergency Meeting for the CEC**

**Bryan Christ** <bryan4mcrp@gmail.com>

Wed 7/20/2022 10:14 AM

 1 attachments (33 KB)

NOTICE OF CALL OF EMERGENCY SPECIAL MEETING.docx;

Pursuant to Article VI Section 2 of the bylaws, an emergency meeting has been called by Becky Vance and the undersigned Precinct Chairs.

----- Forwarded message -----

From: **Becky Vance** <[beckyvance1@gmail.com](mailto:beckyvance1@gmail.com)>

Date: Wed, Jul 20, 2022 at 10:10 AM

Subject: Call for Emergency Meeting for the CEC

To: Bryan Christ <[bryan4mcrp@gmail.com](mailto:bryan4mcrp@gmail.com)>

Cc: Raquel Lewis <[raquel-lewis@outlook.com](mailto:raquel-lewis@outlook.com)>

Mr. Chairman,

The stated emergency is that we have unfinished business that must be completed as required by the enacted bylaws.

Please see the attached document with the agenda as well as the precinct chairs who have called for this meeting.

Thank you,  
Becky Vance  
Precinct Chair 18



Texas Law requires all real estate licensees to give the Information About Brokerage Services to prospective buyers, sellers, tenants and landlords. Please click here to review this information:

[Information About Broker Services](#)

**Becky Vance, REALTOR®**

**Sky Real Estate Professionals**

**281-386-8378 Cell**

**713-481-0118 Fax**





## BECKY VANCE

LANI'S LUCKY SHEPHERDS  
A DOGS BEST FRIEND

[Becky@luckyshepherds.com](mailto:Becky@luckyshepherds.com)

18640 FM 1488

Suite A300

Magnolia, Texas 77354

[www.luckyshepherds.com](http://www.luckyshepherds.com)

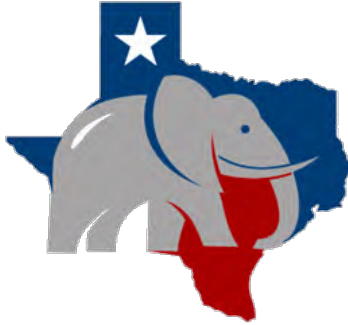
[Lani's Lucky Shepherds](http://Lani's Lucky Shepherds)

*"A Dog's Best Friend!"*

--

Bryan Christ

MCRP Chairman



**MONTGOMERY COUNTY**  
**REPUBLICAN PARTY**  
 of Texas

## **NOTICE OF CALL OF EMERGENCY SPECIAL MEETING**

**Date/Time:** July 25th at 6:30 p.m.

**Location:** 501 N Thompson St, Conroe, TX 77301 (Alan Sadler Building, 4th floor)

**Meeting Type:** Emergency Special Meeting

**Stated Purpose:** To complete business required by the enacted Bylaws to consider the addition of two Ad Hoc Committees, and to consider any candidate wishing to fill a vacancy.

**Called by:** Becky Vance, and the Precinct Chairs listed in the Notice

1. Call to Order
2. Roll Call
3. Invocation
4. Pledges
5. Administer Oath of Office for Precinct Chairs
6. Nomination and Elections of Officers
  - \* Vice Chair
  - \* Secretary
  - \* Treasurer
  - \* 5 at-large officers
7. Nomination and election of Victory 2020 Committee Chair
8. Nomination and election of Vacancy Committee Chair
9. Nomination of Ad Hoc Victory Committee Chair
10. Nomination of Ad Hoc Legislative Priorities Committee Chair
11. Filling vacancies
12. Adjourn

Meeting Called by:

Becky Vance, Precinct 18 Chair

Dale Bible, Precinct 65 Chair

Glenn Speight, Precinct 86 Chair

Gary Reynolds, Precinct 15 Chair

Annette Kerr, Precinct 10 Chair

Charlotte Belin, Precinct 43 Chair  
Lana Hazlett, Precinct 58 Chair  
Laurie Clifton, Precinct 13 Chair  
Greg Long, Precinct 16 Chair  
Chris Crawford, Precinct 53 Chair  
Katherine Rummell, Precinct 45 Chair  
Keith Wagner, Precinct 78 Chair  
Jamie Metts, Precinct 12 Chair  
Mike Medved, Precinct 109 Chair  
Jeff Filbin, Precinct 38 Chair  
Matt Mitchell, Precinct 30 Chair  
Anna Greathouse, Precinct 22 Chair  
Linda Stuckey, Precinct 29 Chair  
John Webb, Precinct 90 Chair  
Raquel Lewis, Precinct 96 Chair  
Ann Kate, Precinct 72 Chair  
Adrian Kaiser, Precinct 66 Chair  
Wendy Lynch, Precinct 25 Chair  
Walter Simms, Precinct 82 Chair  
Susan Johnson, Precinct 20 Chair



## MONTGOMERY COUNTY REPUBLICAN PARTY OF TEXAS

Call for a Special Meeting of County Executive Committee  
 1201 Lake Woodlands Dr., Ste 4020, The Woodlands, TX  
 9:00 AM -until conclusion of Agenda,  
 August 13, 2022

Called by Precinct Chair Dennis Tibbs, Precinct # 76 plus the precinct chairs listed below,  
 pursuant to the MCRPTX By-laws, Article VI, Section 2 and 3

Stated Purpose: To conduct regular Party business, Fill Standing Committee Chairmanships,  
 establish a regular CEC meeting schedule, and seat recommended Precinct Chair vacancy  
 candidates

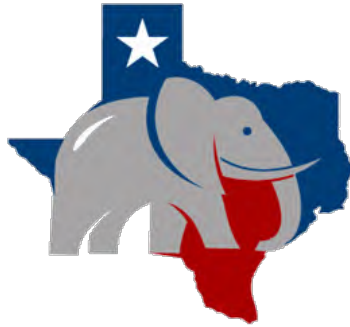
### Agenda

1. Convene
2. Invocation
3. Pledges
4. Roll Call
5. Call to Order
6. Approve Agenda—not amendable
7. Approve Organization Meeting Minutes
8. Vacancy Committee Report
  - a. Nominations of candidates to fill vacancies
  - b. Oath of Office
9. Victory Committee Report
10. Good of the Order
11. Officer Reports
  - a. Chairman
  - b. Vice Chairman
  - c. Secretary
  - d. Treasurer
12. Nominations and appointments to Sub-committee chairmanships
13. New Business
  - a. Resolution to establish a meeting schedule for the CEC
14. Adjourn at the conclusion of this agenda

Page 2, Special Meeting Call for Saturday, Aug. 13, 2022

Meeting called by:

1. Dj Fike, Pct. 102 Chair
2. Robert Walker, Pct 87 Chair
3. Donna McAleer, Pct 61 Chair
4. John Wertz, Pct. 69 Chair
5. Allison Winter, Pct. 59 Chair
6. Kenneth Earnest, Pct 06 Chair
7. Dale Inman, Pct. 27 Chair, SREC SD-4 Committee Man
8. Melinda Olinde, Pct 89 Chair
9. Susan Scruggs, Pct 81 Chair
10. Dennis Tibbs, Pct 76 Chair
11. Kim Webber, Pct 97 Chair
12. Suzanne Rapitoni, Pct 99 Chair
13. Tammy Kelter, Pct 35 Chair
14. Neda Henery, Pct 108 Chair
15. Ginger Russell, Pct 74 Chair
16. Adrian Kaiser, Pct 66 Chair
17. Kristin Plaisance, Pct. 37 Chair
18. Wayne Pearson, Pct 52 Chair
19. Paul Crowson, Pct 36 Chair
20. Kathryn Ross, Pct 67 Chair
21. Luis Pedraza, Pct 110 Chair
22. Nedra Henery, Pct 108 Chair
23. Juanita Simmons, Pct 19 Chair
24. Cathie Loetta, Pct. 71 Chair
25. Christina Lightfoot, Pct 50 Chair
26. Herschel Williams, Pct. 63 Chair
27. Steve Lawrence, Pct 48 Chair



**MONTGOMERY COUNTY**  
**REPUBLICAN PARTY**  
of Texas

**NOTICE OF CALL OF SPECIAL MEETING of Montgomery County Republican Party of Texas, referred to as the Executive Committee**

**Date/Time:** August 13 at 9:00 a.m.

**Location:** Lone Star Community Center, 2500 Lone Star Pkwy, Montgomery, TX 77356

**Meeting Type:** Special Meeting

**Stated Purpose:** Vacancies of Officers, Steering Committee, and Committees and other business

**Called by:** James Byers, Precinct 24 Chair and the Precinct Chairs listed in the Notice

1. Call to Order
2. Roll Call
3. Invocation
4. Pledges
5. Filling vacancies
6. Officers
  - \* Vice Chair
  - \* Secretary
  - \* Treasurer
  - \* 5 at-large Steering Committee EC Representatives
7. Victory 2020 Committee
8. Vacancy Committee
9. Ad Hoc Victory Committee
10. Ad Hoc Legislative Priorities Committee
11. Adjourn

Meeting Called by:

James Byers, Precinct 24 Chair

Becky Vance, Precinct 18 Chair

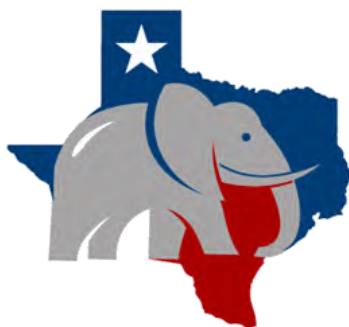
Dale Bible, Precinct 65 Chair

Glenn Speight, Precinct 86 Chair

Annette Kerr, Precinct 91 Chair

Charlotte Belin, Precinct 43 Chair

Charlie Parada, Precinct 105 Chair  
Laurie Clifton, Precinct 13 Chair  
Greg Long, Precinct 16 Chair  
Jamie Metts, Precinct 12 Chair  
Matt Mitchell, Precinct 30 Chair  
Mark Frank, Precinct 10 Chair  
Anna Greathouse, Precinct 22 Chair  
Linda Stuckey, Precinct 29 Chair  
John Webb, Precinct 90 Chair  
Raquel Lewis, Precinct 96 Chair  
Susan Johnson, Precinct 20 Chair  
Scott Baker, Precinct 23 Chair  
Wesley Doolittle, Precinct 106 Chair



**MONTGOMERY COUNTY**  
**REPUBLICAN PARTY**  
 of Texas

## **Montgomery County Republican Party**

SPECIAL MEETING of

Montgomery County Republican Party of Texas,  
 referred to as the Executive Committee

Date/Time: August 13 at 9:00 a.m.

Location: Lone Star Community Center, 2500 Lone Star Pkwy, Montgomery, TX 77356

Meeting Type: Special Meeting. Stated Purpose: Vacancies of Officers, Steering Committee, Committees and other business. Called by: James Byers, Precinct 24 Chair and the Precinct Chairs listed in the Notice

1. Chairman Bryan Christ called the meeting to order at 9:00 am. Bryan calls the meeting at ease. Bryan calls the meeting back to order at 9:08 am.
2. Roll Call. Quorum is 25%. 111 precinct chair positions, 13 vacancies. 98 active precinct chairs, 28 present. We have a quorum.
3. Invocation led by Billy Graff.
4. Pledges led by Charlie Parada.
5. Filling vacancies. Requires 33% present, we do not have quorum to fill vacancies.
6. Elect Officers: Vice Chair, Secretary and Treasurer require a 40% threshold. The 5 at large Steering Committee members are elected with a 25% threshold. Article 5, Section 3. The Steering Committee appoints positions, confirmed by CEC. Bryan Christ is the only steering committee member. The following are the Steering Committee appointments:
  - a. The Steering Committee proposes Scott Baker for position 1. No other nominations. No opposition. Scott Baker is elected for position 1.
  - b. The Steering Committee proposes Judi Thomas for position 2. No other nominations. No opposition. Judi Thomas is elected for position 2.



- c. The Steering Committee proposes James Byers for position 3. No other nominations. No opposition. James Byers is elected for position 3.
  - d. The Steering Committee proposes Jamie Metts for position 4. No other nominations. No opposition. Jamie Metts is elected for position 4.
  - e. The Steering Committee proposes Becky Vance for position 5. No other nominations. No opposition. Becky Vance is elected for position 5
7. Victory 2020 Committee. [Sandra Mobley arrives, precinct 55] The steering committee nominates Laurie Clifton for Victory 2020 Committee chair. No other nominations. No opposition. Laurie is elected Victory 2020 Committee chair.
8. Vacancy Committee. The steering committee nominates Becky Vance for Vacancy Committee chair. No other nominations. No opposition. Becky is elected Vacancy Committee chair.
9. Legislative Priorities Committee. Paused...
10. Ad Hoc Victory Committee:
- a. James Byers motions to call the committee the Victory 2022 Committee. Mark Frank seconds. Need a motion to establish the committee, then we can do other things. Charlie raises a point of information, will we need to change the name again in 2024. It is an ad hoc committee so the committee expires in the next biennium. Raquel Lewis raises a point of information. Anna Greathouse motions to establish an ad hoc victory committee. Charlie Parada seconds. Susan raises a POI, can we make it permanent? We cannot make it a permanent committee without a higher threshold. James Byers raises a POI: Do we need to establish duties? Mark Frank raises a POP: When we nominate the chair, we give them the full backing to run their committee. There was a lot of waste in the 2020 general election, we don't want to see that again. Mark Frank motions to amend the motion to add chair of said committee has full authority and they are the only committee that will have the ability to ~~dictate~~ design and control all of the materials that will be used for the victory committee. Becky Vance seconds. Gary Reynolds motions to amend the amendment, strike dictate. Friendly amendment. Mark accepts. Anna seconds.
  - b. Annette Kerr raises a POI: Our PEC is doing how to vote on the machines. Would that committee have to dictate whether or not they can do that? Bryan clarifies TEC infrastructure. State EC, District EC, County EC, Precinct EC, RPT rules stop at CEC. Bryan has authority to establish PEC, which he has been doing by JP precinct. Each PEC has the authority to elect their own chair. The PEC is an independent organization. Chairs have been elected for three of those PEC. PEC chairs are Scott Baker, Jamie Metts and Becky Vance. The Victory committee chair cannot impose their will on the PEC.

- c. Back to the original amendment to the main motion. James Byers raises a POI, can we restate the amendment. Charlie Parada motions to amend the amendment to add county-wide. Al Moore seconds. Becky raises a POI. For county wide, does that mean there will be no funds distributed for PEC. Answer: That is a separate discussion. Amendment to amendment passes. Back to the amendment to the main motion. No objection. Amendment passes. Back to main motion. No objection to the main motion as amended. We now have an ad hoc Victory Committee established.
  - d. Becky motions to nominate Laurie Clifton as chair of the Victory Committee. No objection. Laurie is elected to the ad hoc Victory Committee.
11. Resume Ad Hoc Legislative Priorities Committee: James motions to establish an ad hoc Legislative Priorities committee. Becky Vance seconds. James seconds to amend name to be ad hoc Legislative Priorities committee. Mark Frank motions to at any point in time if the committee chair is found to be abusing their power, i.e. telling people that the position is already filled even if CEC did not vote on said indicative, they are immediately removed. Bryan indicates that is out of order, we already have a provision in the bylaws for that. No objection. Motion carries
- a. Becky nominates James Byers to be chair of Legislative Priorities committee. No other nominations. No objection. Motion carries.

11. Adjourn

<b>PCT</b>	<b>CHAIR</b>	<b>Roll Call Yes = Present No = Not Present</b>	<b>Roll Call Vote for Financial Resolution</b>	<b>Notes</b>	<b>Y= Yes N = No 0 = No Vote A= Abstain</b>
1	Barbara Ray	n	0		
2	Kent Frappier	y	y		
3	Alex Chandel	n	0		
4	Nelson Reyes	y	y		
5	Doug Taylor	y	y		
6	Kenneth Earnest	y	y		
7	Rapunzel Myers	n	0		
8	Bill Kercheval	n	0		
9	Quentin Smith	n	0		
10	Mark Frank	n	0		
11	Marliese Stripling	n	0		
12	James Metts Jr.	n	0		
13	Laurie Clifton	n	0		
14	Danielle Walters	n	0		
15	Gary D. Reynolds	n	0		
16	Greg Long	n	0		
17	Dale Fessenden	y	y		
18	Becky Vance	n	0		

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Roll Call Vote for Financial Resolution	Notes	Y= Yes N = No 0 = No Vote A= Abstain
19	Juanita G. Simmons	n	0		
20	Susan Johnson	n	0		
21	Alan A. Moore	n	0		
22	Anna Greathouse	n	0		
23	Scott Baker	n	0		
24	James Byers	n	0		
25	Wendy Lynch	n	0		
26	Caleb Smith		y	Sworn In at beginning of meeting and after roll call	
27	Dale Inman	n	0		
28	Ken Walling	n	0		
29	Linda Stuckey	n	0		
30	Matt Michell	n	0		
31	Betty Anderson	y	y		
32	Thomas L. Gardner	y	0	Not present for vote	
33	Scott Robbins	y	y		

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Roll Call Vote for Financial Resolution	Notes	Y= Yes N = No 0 = No Vote A= Abstain
34	Ken Allen	y	y		
35	Tammy Kelter	y	y		
36	Paul Crowson	y	y		
37	Kristen Plaisance	y	y		
38	Jeff Filbin	n	0		
39	Brady Walding	n	0		
40	Josh Graff	y	n		
41	Wayne Long	n	0		
42	Alan Mallard	n	0		
43	Charlotte Belin	n	0		
44	John Schluter	y	y		
45	Kat Rummell	n	0		
46	Yvonne Wunsche	n	0		
47	Mark Fusca	y	n		
48	Steve Lawrence	y	y		
49	Susan Carranza	y	y		
50	Christina Lightfoot	y	y		
51	Victoria Tompkins	n	0		

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Roll Call Vote for Financial Resolution	Notes	Y= Yes N = No 0 = No Vote A= Abstain
52	Wayne Pearson	y	y		
53	Chris Crawford	n	0		
54	Bobbi Bodenhamer		y	Sworn In at beginning of meeting and after roll call	
55	Sandra Mobley	n	0		
56	Srini Katta	n	0		
57	Terri Saxton	n	0		
58	Lana Hazlett	n	0		
59	Allison Winter	y	y		
60	Judi Thomas	n	0		
61	Donna McAleer	y	y		
62	Jennfier Bowling		y	Sworn In at beginning of meeting and after roll call	
63	Herschel Williams	y	y		
64	Roy Jimenez	n	0		

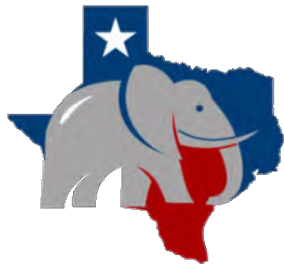
PCT	CHAIR	Roll Call Yes = Present No = Not Present	Roll Call Vote for Financial Resolution	Notes	Y= Yes N = No 0 = No Vote A= Abstain
65	Dale Bible	n	0		
66	Adrian Kaiser	n	0		
67	Kathryn Ross	y	y	Arrived at 10:18 a.m.	
68	Theresa Haag	y	y		
69	John Wertz	y	y		
70	Jack Munich	n	0		
71	Catherine Locetta	y	y		
72	Gwen Withrow	y	A		
73	Ronnie Trojanowski	n	0		
74	Ginger Russell	y	y		
75	Larry Rogers	y	y		
76	Dennis Tibbs	y	y		
77	Robert Coats	n	0		
78	Keith Wagner	n	0		
79	Thomas Lancaster	y	y		

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Roll Call Vote for Financial Resolution	Notes	Y= Yes N = No 0 = No Vote A= Abstain
80	Steven Foster		0	Sworn In at beginning of meeting and after roll call	
81	Susan Scruggs	y	y		
82	Walter Simms	n	0		
83	Patricia Carr	n	0		
84	Mark Pruitt	y	y		
85	Torrey Bingham	y	y		
86	Glenn Speight	n	0		
87	Robert Walker	y	y		
88	Frederick Sunderman	n	0		
89	Melinda Olinde	n	0		
90	John Webb	n	0		
91	Annette Kerr	n	0		
92	Mara Wasar	y	y		
93	Denise Ebert	n	0		
94	Mary Lewis	y	y		



PCT	CHAIR	Roll Call Yes = Present No = Not Present	Roll Call Vote for Financial Resolution	Notes	Y= Yes N = No 0 = No Vote A= Abstain
95	Sherry Tavel		y	Vacant per Website and Allison; Sworn in at beginning of meeting and after roll call	
96	Raquel Lewis	n	0		
97	Kimberly Weber	y	y		
98	Stephanie Cox	y	y		
99	Suzanne Rapattoni	y	y		
100	George Hyde	y	A		
101	Stephanie Schwantes	n	y	Sworn In at beginning of meeting and after roll call	
102	DJ Fike	y	y		
103	Thomas Bartley	y	y	Arrived at 10:00 a.m.	

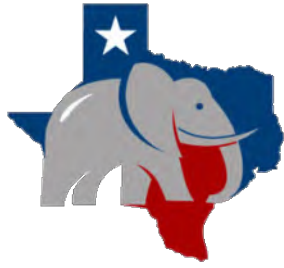
PCT	CHAIR	Roll Call Yes = Present No = Not Present	Roll Call Vote for Financial Resolution	Notes	Y= Yes N = No 0 = No Vote A= Abstain
104	Diane Campbell	n	0		
105	Charlie Parada	n	0		
106	Wesley Doolittle	n	0		
107	Jackie Williams		y	Sworn In at beginning of meeting and after roll call	
108	Neda Henery	y	y		
109	Mike Medved	n	0		
110	Luis Pedraza	y	y		
111	Partick Teich		y	Sworn In at beginning of meeting and after roll call	
	Yes	45	47		
	No	58	2		
	Abstain		2		



**MONTGOMERY COUNTY**  
**REPUBLICAN PARTY**  
 of Texas

**County Executive Committee Special Meeting Minutes**  
 1201 Lake Woodlands Dr., Ste 4020, The Woodlands, TX  
 August 13 2022, 9:00 a.m.

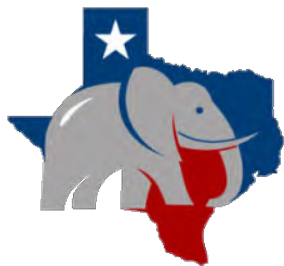
1. Convene at 9:10 a.m. by Vice Chairman (VC), Jon Bouche.
  - a. Meeting called by Dennis Tibbs (76) in accordance with Article VI, Section 2 & 3 in bylaws – **Exhibit A**
  - b. It was noted that Bryan Christ (Chairman) was not present
  - c. Parliamentarian - Sherry Tavel (95)
  - d. Sergeant of Arms – Calvin Russell
2. Invocation by Dale Fessenden (17)
3. Pledges by Jon Bouche (Vice Chair)
4. Roll Call
  - a. Completed by Staci Earnest, Secretary with assistance from Dale Fessenden (17).
  - b. POP by Kristin Plaisance (37) asked that Precinct Chair #s and names be called out when doing roll
  - c. Quorum was established with 43 members present. **Note:** 2 Precinct chairs arrived later and are noted on the roll call sheet. **Exhibit B**
5. Call to Order at 9:25 a.m.
6. Approve Agenda—not amendable since this is a special meeting
  - a. Kenneth Earnest (6) motions to approve agenda
  - b. Dale Fessenden (17) seconds the motion
  - c. By voice vote the agenda passes
7. Approve Organization Meeting Minutes –
  - a. Larry Rogers (75) motions to approve
  - b. Scott Robbins (33) seconds the motion;
  - c. The I's have the majority and no objections by voice vote
8. Vacancy Committee Report - Attach Allison's report – **Exhibit C**
  - a. Nominations of candidates to fill vacancies presented by Allison Winter (59)
    - i. Caleb Smith (26)
    - ii. Bobbi Bodenhamer (54)
    - iii. Jennifer Bowling (62)
    - iv. Steven Foster (80) – not present
    - v. Sherry Tavel (95)
    - vi. Stephanie Schwantes (101)
    - vii. Jackie Williams (107)



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- viii. Patrick Teich (111)
  - b. Kent Frappier (2) motions to accept the vote by group for new precinct chairs
  - c. John Wertz (69) makes a second
  - d. motion passes by voice vote; all precinct chairs were approved.
  - e. Oath of Office given by Gwen Withrow (72 & SREC) ; all newly elected precinct chairs agreed to the oath
  - f. No additional vacancies at this time
  - g. Jon Bouche (VC) recognized Allison Winter (59) for her leadership on the Vacancy committee.
  - h. Jon Bouche (VC) thanked the new precinct chairs and those currently serving and asked that they stay the course even in this current environment and fulfill their precinct chair duties.
- 9. Victory Committee Report
  - a. POO – George Hyde (100) asked that the CEC address the Chair not the audience
  - b. John Wertz (69) presented a presentation – **Exhibit D**
  - c. Committee participants
  - d. Early voting starts 10/24
  - e. Races & Props were reviewed
  - f. Nov 2022 Mailer to be developed; showed copy of the Nov 2020 mailer
  - g. Historical spend was \$40K in mailers, push cards and texts in 2020
  - h. Trifold created. Will be used as an Intro to new movers and will be stored at the MCRPTX office; need precinct chairs to distribute; Robert Walker (87) to get list of new movers to precinct chairs
  - i. October 11 is the last day to register
  - j. Action Items – Trifolds, Mailers and Social Media
  - k. POI – Kim Weber (97) – can we add Next Door and Telegram to Social Media list
  - l. POI – Jennifer Bowling (62) Do we need anything special to register voters? Jon Bouche (VC) Yes – you have to deputized to register people; See those precinct chairs who are deputized to assist. Take the test online to be deputized. Another way to reach voters is through your church and special events in your neighborhood
  - m. Jon Bouche (VC) recognized John Wertz (69) for his leadership and fundraising efforts.
- 10. Good of the Order
  - a. This was implemented by request of DJ Fike (102) following Robert Rules of Order
  - b. No motions will be done during this time. This is discussion only.
  - c. DJ Fike (102) was recognized by Jon Bouche (VC)



**MONTGOMERY COUNTY**  
**REPUBLICAN PARTY**  
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## **County Executive Committee Special Meeting Minutes**

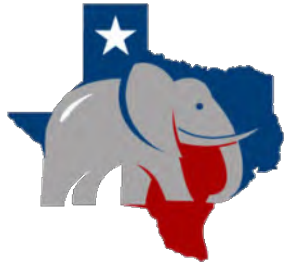
1201 Lake Woodlands Dr., Ste 4020, The Woodlands, TX

August 13 2022, 9:00 a.m.

- d. DJ Fike (102) discussed a new Vision and Action Plan
  - i. Hand-outs were provided to all CEC precinct chairs at the start of the meeting.  
**Exhibit E**
  - ii. Kristen Plaisance (37) - can we add the constitution values to the vision statement
  - iii. Kenneth Earnest (6) – can we add – honor God in all endeavors in the vision statement
  - iv. Jon Bouche (VC) asked that they email DJ Fike (102) with those suggestions
  - v. Kim Weber (97) – Freedom Caucus has a similar vision and mission statement.;  
 Jon Bouche (VC) stated to talk to Kim if you have any questions on that group.

### 11. Officer Reports

- a. Chairman – Bryan Christ is not present
- b. Vice Chairman
  - i. No additional updates
- c. Secretary
  - i. Provided the Minutes from the July 23, 2022 Emergency Meeting on July 25, 2022 to the Steering Committee and Chairman.
  - ii. Requested the information and the ability to load the minutes to the MCRPTX website from the Chairman; July 25, July 29 and August 2(Raquel Lewis (current Secretary & 96)), 2022.
  - iii. POI – Robert Walker (87) – did you receive a response on any of those communications/emails? Staci Earnest (Secretary) answered “no.”
- d. Treasurer
  - i. John Wertz (69) – Asst Treasurer gave an update
  - ii. \$53,857 in the bank – see report handed out to all precinct chairs – **Exhibit F**
  - iii. Charles Shirley (Treasurer) stated that Charles and Jon Bouche (VC) are to be added to the account.
  - iv. Resolution handed out by Charles Shirley (T). Resolution Authorization to conduct business with any bank, financial institution and or government agency - **Exhibit G**
  - v. Jon Bouche (VC) – there are multiple accounts. The resolution is for the fundraising needs to help run the campaign.
  - vi. POI – Dale Fessenden (17) – is there a need to have the Vice Chair or Chairman Christ to be on the account? Response by Jon Bouche (VC) I did request not to



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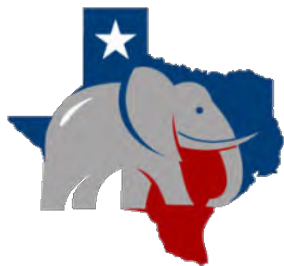
**County Executive Committee Special Meeting Minutes**  
 1201 Lake Woodlands Dr., Ste 4020, The Woodlands, TX  
 August 13 2022, 9:00 a.m.

be on the account; John Wertz (69) and Charles Shirley(T) agreed that having 3 signers would be more beneficial and add creditability to the situation.

- vii. POI – Allision Winter (59) – Concerned with the word “individually”; Good to have 2 signatories.
- viii. John Wertz (69)– for every check, large and small, would require 2 signatures, i.e. rent, supplies, etc.
- ix. Jon Bouche (VC) – in our bylaws there is a \$250 threshold; Is he Ok with anyone else in the CEC being a signer; We need to put in safeguards.
- x. POI – Kenneth Earnest (6)– being a signer on another account, it is good to have a threshold put in for when 2 signers are needed.
- xi. Jon Bouche (VC) - Article VII states the threshold
- xii. POO – George Hyde (100)– This is a special meeting, and this item was not include in the meeting notice
- xiii. Charles Shirley (T) and Sherry Tavel (Parliamentarian & 95) discussed the POO
- xiv. Jon Bouche (VC) stated the motion is ruled in favor of George Hyde (100) that discussing this resolution now is out of order. This item will be deferred and discussed under new business.

**12. Nominations and appointments to Sub-committee chairmanships**

- a. Resolutions – Neda Henery (108) was nominated by SC. Vice Chair asked for nominations 3 times – no objections; Neda Henery (108) is appointed.
- b. Rules – Robert Walker (87) was nominated by SC. Vice Chair asked for nominations 3 times – no objections. Robert Walker (87) is appointed.
- c. Finance – Doug Taylor (5) was nominated by SC. Vice Chair asked for nominations 3 times – no objections. Doug Taylor is appointed.
- d. Candidates – Jon Bouche (VC) opened up nominations. Ginger Russell (74) nominated Susan Scruggs (81); Susan Scruggs (81) accepts; Vice Chair asked for nominations 3 times – no objections. Susan Scruggs (81) is appointed.
- e. Fundraising – Lindsey Kasprzak was nominated by the SC. However, no one has spoken to Lindsey. This committee chair remains open.
- f. Technology – Torrey Bingham (85) was nominated by SC. Vice Chair asked for nominations 3 times – no objections. Torrey Bingham (85) is appointed.
- g. POI Neda Henery (108) – anyone who would want to be nominated for Fundraising; POI – Nelson Reyes (4) – What are the requirements? Jon Bouche (VC) - to fundraise; Ginger Russell (74) nominates John Wertz (69); John Wertz (69) declined.



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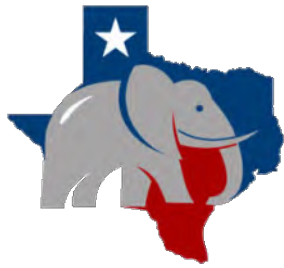
**County Executive Committee Special Meeting Minutes**  
 1201 Lake Woodlands Dr., Ste 4020, The Woodlands, TX  
 August 13 2022, 9:00 a.m.

- h. Marketing/PR – Kim Weber (97) was nominated by SC. Vice Chair asked for nominations 3 times – no objections. Kim Weber (97) was appointed.
- i. Headquarters – Jon Bouche (VC) asked for nominations.
  - i. POI by DJ Fike (102) – would it help if we read the description of the role?
  - ii. Jon Bouche(VC) read the description found in the Bylaws.
  - iii. POI – Kim Weber (97) – can we keep the headquarter stocked with push cards;
  - iv. Nelson Reyes (4) nominated himself. Vice Chair asked for nominations 3 times – no objections; Nelson Reyes (4) is appointed.
- j. Community Engagement - Bob Bagley was nominated by the SC; Vice Chair asked for nominations 3 times – no objections; Bob Bagley is appointed.
- k. Training & Development – Karen Zeller was nominated by the SC; Vice Chair asked for nominations 3 times – no objections; Karen Zeller is appointed.
- l. Communications – Lisa Railey was nominated by the SC; Betty Anderson (31) stated that Lisa Railey is interested. Vice Chair asked for nominations 3 times – no objections; Lisa Railey is appointed.
- m. Elections - George Hyde (100) was nominated by the SC; Vice Chair asked for nominations 3 times – no objections; George Hyde (100) is appointed.
- n. Legislative – Kent Frappier (2) was nominated by the SC; DJ Fike(102) nominated Bonnie Lyons; Kent Frappier (2) withdrew his nomination; Vice Chair asked for nominations 3 times – no objections; Bonnie Lyons is appointed.
- o. Education – Ginger Russell (74) was nominated by the SC. Vice Chair asked for nominations 3 times – no objections; Ginger Russell (74) is appointed.

**13. New Business**

- a. Resolution to establish a meeting schedule for the CEC – **Exhibit H**
  - i. Kent Frappier (2) made a motion to adopt as proposed; Neda Henery (108) provided second.
  - ii. Discussion – Dale Fessenden (17) has some conflicts but will make it work; but have we have secured a location for those meeting dates? Jon Bouche (VC) as per the resolution, location is TBD.
  - iii. POI George Hyde (100) – who can make the meeting call, only the chair? Jon Bouche (VC) - No, anyone can make that meeting call
  - iv. POI DJ Fike (102) – on the back of CEC meeting schedule resolution is also the SC meeting schedule resolution. The adoption of the CEC meeting schedule impacts the SC meeting schedule.
  - v. Jon Bouche (VC) stated there is a motion on floor to adopt the resolution





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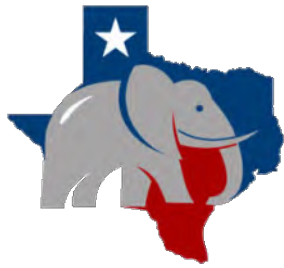
**County Executive Committee Special Meeting Minutes**

1201 Lake Woodlands Dr., Ste 4020, The Woodlands, TX

August 13 2022, 9:00 a.m.

- vi. Discussion was closed
- vii. The I's have the voice vote, no objections
- viii. SC meeting date and times passed at the SC meeting.
- b. Resolution Authorization to conduct business with any bank, financial institution and or government agency revisited **Exhibit G**
  - i. Jon Bouche (VC) re-read the resolution
  - ii. POI – Susan Carranza (49) – Has this been discussed with the bank about how to add/remove signers?
  - iii. Charles Shirley (T) responded that this resolution was created in conjunction with counsel and the bank
  - iv. POI – Susan Carranza (49) will this be a roll call vote? Jon Bouche (VC) - No, unless someone calls for a roll call vote
  - v. POI – John Wertz (69)– We need to provide the minutes and the resolution to the bank
  - vi. Jon Bouche (VC) recognizes Cathy Locetta (71)
  - vii. POI Cathy Locetta (71) - what other accounts are there?
    - 1. Corporate Account – support MCRPTX Headquarter overhead
      - a. POI by George Hyde (100) – It is called corporate account to run the business? The response was yes by Jon Bouche (VC)
    - 2. Primary Account – to fund the primary elections; judges, clerks, state, push cards, texts, etc.
    - 3. Pioneer/Sunflower Account – Misc. Income and expenses for the MCRPTX, i.e. rent, legacy copier and other party expenses.
  - viii. POI by Neda Henery (108) – can we put in the name of the account in the resolution? John Wertz (69) – it was done this way under the counsel given by the attorney should the bank change their name or we change banks.
  - ix. POI Ginger Russell (74) – I have complete trust in those who drafted this resolution and support this resolution
  - x. Jon Bouche (VC) recognizes Josh Graff (40); Concerned about the optics at this time; could we add the 2-signature verification? Josh made a motion to amend to add the requirement for a 2<sup>nd</sup> signature. There was no second. Motion does not pass
  - xi. 2<sup>nd</sup> motion by Josh Graff (40) to remove Jon Bouche and nominate someone else. There was a second by Hershel Williams (63). Hershel Williams (63)





**MONTGOMERY COUNTY**  
**REPUBLICAN PARTY**  
 of Texas

**County Executive Committee Special Meeting Minutes**  
 1201 Lake Woodlands Dr., Ste 4020, The Woodlands, TX  
 August 13 2022, 9:00 a.m.

withdrew the second; Neda Henery (108) seconded and then withdrew her second. Mark Fusca (47) made a second.

xii. Discussion:

1. Scott Robins (33) spoke against
2. Ginger Russell (74) spoke against
3. Dale Fessenden (17) spoke against
4. No discussion was given in favor of the motion

xiii. POI Neda Henery (108) – the resolution says it needs to have two Executive members; POI Robert Walker (87) – asked similar question.

xiv. POI – Ginger Russell (74) – could Chairman Christ do the same process to add signature card? Charles Shirley (T) responded with yes – he would have to follow the same process.

xv. Jon Bouche (VC) recognizes Steve Lawrence (48) – this is an urgent need to resolve today.

xvi. Jon Bouche (VC) recognizes John Wertz (69)– there is a risk that the Chair could take funds out, up to \$250. We have an appt on Monday with the bank.

xvii. Call to question by Christina Lightfoot (50); Kim Weber (97) second. Amendment fails to remove Jon Bouche by voice vote.

xviii. POI – Mary Lewis (94) can this change be made done today? Charles Shirley (T) – bank is closed today

xix. Kirsten Plaisance (37) – called for a roll call vote; John Wertz (69) provided second

xx. Resolution passes by 47 yes; 2 No and 2 abstains by roll call vote. **Exhibit B**

xxi. POI – Bobbi Bodenhamer (54) – was in banking for a long time, the bank did not recognize 2 signatures, it was more of an internal control. A person could still write a check above that limit, and the organization would have to file an injunction; Jon Bouche (VC) thanked Bobbi Bodenhamer (54) for her information.

14. Adjourn at the conclusion of this agenda

- a. Motion to adjourn was made by Scott Robbins (33) and second by Dale Fessenden (17); motion passes by voice vote
- b. Adjourned at 11:15 a.m.

**Vacancy Committee Report to CEC**  
**Special Meeting**  
August 13, 2022

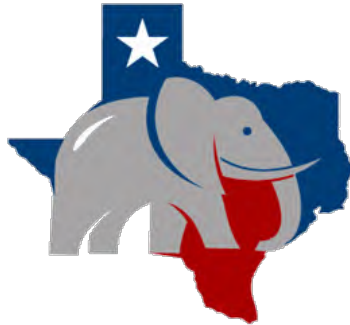
The Vacancy committee met on August 10th. A quorum was present.

We have 8 people today to consider for appointment to fill their precinct vacancies. All are being recommended **by unanimously consent.**

**Pct 26- Caleb Smith**  
**Pct 54- Bobbi Bodenhamer**  
**Pct 62- Jennifer Bowling**  
**Pct 80- Steven Foster**  
**Pct 95- Sherry Tavel**  
**Pct 101- Stephanie Schwantes**  
**Pct 107- Jackie Williams**  
**Pct 111- Patrick Teich**

**Jay Wright, Republican Nominee for the 9th Court of Appeals, PI 2**  
Will administer the oath.

From: Allison Winter  
Vacancy Chair 2022-2024



**MONTGOMERY COUNTY**  
**REPUBLICAN PARTY**  
of Texas

**NOTICE OF CALL OF SPECIAL MEETING of Montgomery County Republican Party of Texas, referred to as the Executive Committee**

**Date/Time:** September 6, 2022, at 6:30 p.m.

**Location:** Lone Star Community Center, 2500 Lone Star Pkwy, Montgomery, TX 77356

**Meeting Type:** Special CEC Meeting

**Stated Purpose:** Vacancies, Officers, Committees and other business

**Called by:** James Byers, Precinct 24 Chair and the Precinct Chairs listed in the Notice

1. Call to Order
2. Roll Call
3. Invocation
4. Pledges
5. Filling vacancies
6. Officers
  - \* Vice Chair
  - \* Secretary
  - \* Treasurer
7. Committees
8. Rules Changes
9. Adjourn

Meeting Called by:

James Byers, Precinct 24 Chair

Greg Long, Precinct 16 Chair

Wayne Long, Precinct 41 Chair

Jamie Metts, Precinct 12 Chair

Raquel Lewis, Precinct 96 Chair

Dale Bible, Precinct 65 Chair

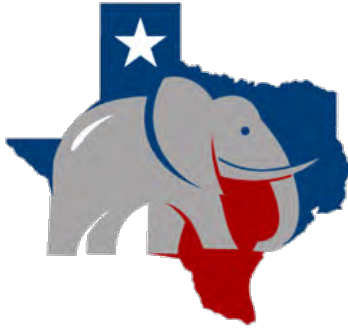
Judi Thomas, Precinct 60 Chair

Annette Kerr, Precinct 91 Chair

Linda Stuckey, Precinct 29 Chair

Charlotte Belin, Precinct 43 Chair

Scott Baker, Precinct 23 Chair  
Danielle Walters, Precinct 14 Chair  
Susan Johnson, Precinct 20 Chair  
Matt Mitchell, Precinct 30 Chair  
Laurie Clifton, Precinct 13 Chair  
Becky Vance, Precinct 18 Chair  
John Webb, Precinct 90 Chair  
Marliese Stripling, Precinct 11 Chair  
Glenn Speight, Precinct 86 Chair  
Wesley Doolittle, Precinct 106 Chair  
Charlie Parada, Precinct 105 Chair  
Victoria Tompkins, Precinct 51 Chair  
Lana Hazlett, Precinct 58 Chair  
Anna Greathouse, Precinct 22 Chair  
Ann Kate, Precinct 72 Chair



# MONTGOMERY COUNTY REPUBLICAN PARTY of Texas

## Montgomery County Republican Party

SPECIAL MEETING of Montgomery County Republican Party of Texas,  
referred to as the Executive Committee

Date/Time: September 6, 2022 at 6:30 pm

Location: Lone Star Community Center, 2500 Lone Star Pkwy, Montgomery, TX 77356

1. Chairman Bryan Christ calls meeting to order at 6:32 pm
  - Bryan Christ calls meeting at ease while Raquel Lewis prepares for meeting
  - Bryan Christ calls meeting back to order at 6:37
2. Roll Call. Raquel Lewis calls roll: 30 present, we have a quorum.
3. Invocation led by Charlotte Belin.
4. Pledges led by Scott Baker.
5. Filling Vacancies. Sufficient quorum is not present to fill County Executive Committee vacancies. Vacancy Committee Chair Becky Vance speaks to the status of vacancies
  - Three Precinct Chair candidates to consider and vote on when quorum is present: Destiny Stark – Precinct 92, John Irvin Thomas – Precinct 26, Kenneth Ditto – Precinct 103
  - Becky Vance motions for Resolution, per RPT rules 7c, to allow for electronic voting on vacancies as sent by Vacancy Committee Chair Becky Vance. Anna Greathouse seconds.
  - Mark Frank raises a point of information: Did anyone else show interest in those positions? Answer: No
  - James Byers raises a point of information: Were others invited? Answer: Yes
  - James Byers asks Bryan Christ to express his view on the Freedom Caucus filling vacancies. Freedom Caucus claims they have filled the vacancies, but they have not been reported to the state. Bryan Christ provides feedback on the clear difference of opinion. Rules are very clear.
  - Scott Baker raises a point of information: Would voting be accepted digitally for vacancies? Answer: Yes, once they have been vetted by the committee. Question 2, Is this permissible under the rules? Answer: Yes, under RPT rule 7c. James Byers reads rule 7c
  - James Byers speaks for the motion (1). All precinct chairs would be able to participate

- Scott Baker raises a point of information: How will that be credentialed?  
Answer: name and email can be required in the survey requesting votes.
  - Matt Mitchell raises a point of information: What happens if there is a split?  
Answer: Chairman is permitted a tie breaker vote. Mark Frank clarifies the question: What happens if there are a majority that vote no? It is a simple majority vote. James Byers provides an example. Online meetings have had great attendance.
  - Anna Greathouse speaks for the motion (2)
  - Lana Hazlett raises a point of information: Who will be included? Answer: Just the people that are vetted by the Vacancy Committee chaired by Becky Vance.
  - Question called. No objection. Motion carried unanimously.
6. Officers. Sufficient quorum is not present to fill Officer vacancies of Vice Chair, Secretary, and Treasurer.
- a. James Byers motions to allow appointed Officers not yet confirmed to serve as temporary Officers as such time as an appointment is confirmed. James Byers explains: It allows the job to be performed to be extended outside the meeting so work can be done.
  - b. Scott Baker raises a point of information: We need 40% for officers? Answer: Article 3, section 4, item 2 indicates that only 25% is required if the person is already an elected Precinct Chair. Answer: It has to do with filling Precinct Chair vacancies, not Officers. There is a defect in the language, which is egregious enough to be in-actionable.
  - c. Motion is on the floor. Becky Vance seconds motion. Bryan Christ indicates this motion is out of order in the current form and calls the meeting at ease at 7:13 pm. Bryan Christ calls the meeting back to order at 7:14 pm. James Byers withdraws his motion and makes a new motion.
  - d. James Byers motions to allow appointed Officers not yet confirmed to serve as temporary Officers until such time a permanent Officer is established. Bryan Christ explains the changes in the motion. Mark Frank seconds. Charlotte Belin raises a point of information: If we appoint temporary officers, can they be replaced? Answer: Yes. Scott Baker raises a point of information: Is this action already covered in the Steering Committee duties? Answer: When the Steering Committee does the appointment or recommendation, that is for permanent Officers which is not what we are discussing here.
  - e. No additional discussion. No objection. Motion carries.
  - f. Charlie Parada raises a point of information: Seems that we can fill Precinct Chairs tonight based on previous biennium bylaws. Charlie Parada withdraws
  - g. Mark Frank raises a point of information: Has anyone been nominated? Answer: The Steering Committee nominated individuals for those roles: Raquel Lewis, Vice Chair...Darlene Kurtz, Treasurer...Danielle Walters, Secretary.
  - h. Scott Baker motions that we appoint as temporary Officers those that the Steering Committee recommends for the permanent. Linda Stuckey seconds. No additional discussion. No objection. Motion carries.

- i. Lana Hazlett raises a point of information: Who is handling the money? Are there two of every Officer? Answer: There is only one recognized as legitimate. POI: Who controls the checkbook and the bank accounts? Bryan Christ is sole signatory on the corporate account, Bryan Christ is sole signatory on the primary account, Bryan Christ indicates that he was removed from the general account. Bryan Christ also has an officeholder account, where he is the sole signatory.
- j. Linda Stuckey raises a point of privilege: Hopefully this will be resolved when we go to mediation.
- k. Mark Frank raises a point of privilege: If there is no treasurer, Bryan Christ is required to handle the books.
- l. Laurie Clifton raises a point of information: Now that we have a temporary Treasurer, do we need to add access to bank accounts for the temporary role or is that person just to handle the books? Answer: TEC and FEC is simply reporting dollars in and dollars out, That is the person on file with them.
- m. James Byers raises a point of information: For us, the Treasurer duties are defined by the bylaws. They stipulate financial reports made to the County Executive Committee, nothing about being a signatory or signing checks. The role is limited to reporting.
- n. Anna Greathouse raises a point of information: Can Bryan Christ speak to what has happened to the money in the general account? Does Bryan Christ have to report on what the Freedom Caucus is doing with the money of the account for which Bryan Christ was removed? Answer: Bryan Christ does not have access, and does not know what is being done with the money?
- o. Mark Frank speaks to the responsibilities: It is the responsibility of the Treasurer to file reports.
- p. Jeff Filbin raises a point of information: How much money was in that account? Answer: About \$50K.
- q. Scott Baker raises a point of information: Under what authority did they claim to remove you from the bank account since you have not been removed from office? Bryan Christ responds.
- r. James Byers raises a point of information: Normally, when someone is removed, the bank expects the person to be removed and the person to be added to appear. The Freedom Caucus prepared documentation indicating that Bryan Christ had been removed and presented to the bank. James Byers explains rule 8n.
- s. Scott Baker raises a point of information: Does the Freedom Caucus believe they actually removed Bryan Christ as chair. Answer: No, They indicated they are justified in removing him.
- t. Dale Bible raises a point of information: What happens when two financial reports are filed with the state? Answer: Don't know how this will go forward, but it has been done in the past. Two codes have been permitted in the past

7. Committees. Bryan Christ introduces this section because it comes out of the Steering Committee. When the Steering Committee met, they made some nominations for votes on committee chairs as follows:
  - a. Rules – James Byers. No objection.
  - b. Financial Review – Mark Frank. No objection.
  - c. Fundraising – Susan Johnson. No objection.
  - d. Technology – Scott Baker. No objection.
  - e. Headquarters – Dorothy Woodall. No objection.
  - f. Community Engagement – Annette Kerr. No objection.
  - g. Marketing & PR – Raquel Lewis. No objection.
  - h. James Byers raises a point of information: Another ad hoc committee was added  
Answer: Bryan Christ confirms.
  - i. Conduct & Ethics. Did not establish a chair for that committee. James Byers nominates himself. No objection
  - j. Legislative Priorities committee was established in a previous meeting
  - k. Other committees have already been established and chairs appointed
  
8. Rules Changes. James Byers speaks to rules changes, He has prepared a set of bylaw changes. James Byers explains process according to the bylaws:
  - Marked up and clean versions were shared electronically, James Byers reviews the changes. James Byers requested that everyone and provide any comments to the Rules committee
  - James Byers moves as the chair of the committee that the revisions received by email be referred to the Rules committee for incorporation as a permanent change, which will then come back to the County Executive Committee for permanent changes. Scott Baker seconds.
  - Susan raises a point of information. Who is on the rules committee? Answer: James Byers indicates he needs volunteers. Committee chairs have authority to appoint members to their committees. Just reach out to the committee chairs. Anyone can be a member of a committee, they do not have to be a precinct chair
  - Mark Frank raises a point of information: Mark Frank wants to change the title of his committee. Answer: You can have an ad hoc committee for that
  - James Byers raises a point of order: He is still discussing rules:
    - The party will be going into mediation, James Byers explains Mediation is on the 16th and the mediator is State Chairman Matt Rinaldi. Mediator's role is not to be taking sides. Mediator will not be determining who is right and who is wrong. James Byers entertains questions.
    - Question: Who are the persons attending mediation? Answer: On our side, James Byers, Linda Stucky and Raquel Lewis. Do not know who will be attending on the Freedom Caucus side
  - James Byers moves "seeing no prohibition in the bylaws for County Executive Committee online meetings: (verbiage to be added)
  - Charlie Parada raises a point of information: How do RPT rules allow for that? Answer: James Byers explains based on rule 8j



- Bryan Christ asks if this is a resolution? Answer: Yes. Motion is out of order. Bryan Christ indicates that online meetings are prohibited except for indicated circumstances. James Byers withdraws his motion
  - Gary Reynolds raises a point of information: RPT allows it only in the case of Chairman calling a meeting in a stated emergency.
9. Financial Review Committee. Bryan Christ explains options for committee name change. Mark Frank declines. Will need a rules change. Mark Frank requests Rules change.
  10. Catfish Festival. Scott Baker speaks to the festival. Bill Kercheval has gotten the party a tent at the festival. Need volunteers. Daytime. Promote party, Push cards, New voting system.
  11. Prayer. Scott Baker requests that everyone is prayerful about the upcoming mediation
  12. Mediation. Linda Stuckey speaks to the topic
  13. Adjourn

Meeting adjourned at 8:05 pm

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Votes No roll call votes were taken this meeting	Notes	Y= Yes N = No 0 = No Vote A= Abstain
1	Barbara Ray	n			
2	Kent Frappier	y			
3	Alex Chandel	n			
4	Nelson Reyes	y			
5	Doug Taylor	y			
6	Kenneth Earnest	y			
7	Rapunzel Myers	n			
8	Bill Kercheval	n			
9	Quentin Smith	n			
10	Mark Frank	n			
11	Marliese Stripling	n			
12	James Metts Jr.	n			
13	Laurie Clifton	n			
14	Danielle Walters	n			
15	Gary D. Reynolds	n			
16	Greg Long	n			
17	Dale Fessenden	y			
18	Becky Vance	n			
19	Juanita G. Simmons	y			
20	Susan Johnson	n			
21	Alan A. Moore	n			
22	Anna Greathouse	n			
23	Scott Baker	n			
24	James Byers	n			
25	Wendy Lynch	n			
26	Caleb Smith	y			
27	Dale Inman	y			
28	Ken Walling	n			

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Votes No roll call votes were taken this meeting	Notes	Y= Yes N = No 0 = No Vote A= Abstain
29	Linda Stuckey	n			
30	Matt Michell	n			
31	Betty Anderson	y			
32	Thomas L. Gardner	n			
33	Scott Robbins	y			
34	Ken Allen	y			
35	Tammy Kever	y			
36	Paul Crowson	n			
37	Kristen Plaisance	y			
38	Jeff Filbin	n			
39	Brady Walding	n			
40	Josh Graff	y			
41	Wayne Long	n			
42	Alan Mallard	n			
43	Charlotte Belin	n			
44	John Schluter	y			
45	Kat Rummell	n			
46	Yvonne Wunsche	n			
47	Mark Fusca	y			
48	Steve Lawrence	y			
49	Susan Carranza	y			
50	Christina Lightfoot	n			
51	Victoria Tompkins	n			
52	Wayne Pearson	n			
53	Chris Crawford	n			
54	Bobby Bodenhamer	n			
55	Sandra Mobley	n			
56	Srini Katta	n			

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Votes No roll call votes were taken this meeting	Notes	Y= Yes N = No 0 = No Vote A= Abstain
57	Terri Saxton	n			
58	Lana Hazlett	n			
59	Allison Winter	y			
60	Judi Thomas	n			
61	Donna McAleer	y			
62	Jennfier Bowling	y			
63	Herschel Williams	y			
64	Roy Jimenez	n			
65	Dale Bible	n			
66	Adrian Kaiser	y			
67	Kathryn Ross	y			
68	Theresa Haag	y			
69	John Wertz	y			
70	Jack Munich	n			
71	Catherine Locetta	y			
72	Gwen Withrow	y			
73	Ronnie Trojanowski	y			
74	Ginger Russell	y			
75	Larry Rogers	n			
76	Dennis Tibbs	y			
77	Robert Coats	n			
78	Keith Wagner	n			
79	Thomas Lancaster	y			
80	Steven Foster	y			
81	Susan Scruggs	y			
82	Walter Simms	n			
83	Patricia Carr	y			
84	Mark Pruitt	y			

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Votes No roll call votes were taken this meeting	Notes	Y= Yes N = No 0 = No Vote A= Abstain
85	Torrey Bingham	n			
86	Glenn Speight	n			
87	Robert Walker	y			
88	Frederick Sunderman	n			
89	Melinda Olinde	y			
90	John Webb	n			
91	Annette Kerr	n			
92	Mara Wasar	n			
93	Denise Ebert	n			
94	Mary Lewis	y			
95	Sherry Tavel	y			
96	Raquel Lewis	n			
97	Kimberly Weber	y			
98	Stephanie Cox	y			
99	Suzanne Rapattoni	y			
100	George Hyde	n			
101	Stephanie Schwantes	n			
102	DJ Fike	y			
103	Thomas Bartley	y			
104	Diane Campbell	y			
105	Charlie Parada	n			
106	Wesley Doolittle	n			
107	Jackie Williams	y			
108	Neda Henery	n			
109	Mike Medved	n			
110	Luis Pedraza	y			
111	Partick Teich	y			

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Votes <b>No roll call votes were taken this meeting</b>	Notes	Y= Yes N = No 0 = No Vote A= Abstain
	Yes	49	0		
	No	55	0		
	Abstain		0		



## Montgomery County Republican Party

### County Executive Committee Meeting Agenda

1201 Lake Woodlands Dr., Suite 4020, The Woodlands, TX

September 6, 2022 at 6:30 p.m.

1. Convene
2. Prayer
3. Pledges
4. Roll Call
5. Call to order
6. Approval of the Agenda
7. Approval of the Minutes
8. Vacancy Committee Report
9. Officer Reports
  - a. Chairman
  - b. Vice Chairman
  - c. Secretary
  - d. Treasurer
10. Good of the Order
11. Committee Reports
  - a. Victory Campaign Committee
  - b. Resolutions Committee (For non CEC Members)
  - c. Rules Committee
  - d. Financial Review Committee
  - e. Candidates Committee
  - f. Fundraising Committee
  - g. Technology Committee
  - h. Marketing/PR Committee
  - i. Headquarters (HQ) Committee
  - j. Community Engagement Committee
  - k. Training & Support Committee
  - l. Communications Committee
  - m. Elections Committee
  - n. Legislative Committee
12. New Business
13. Adjourn at completion of Agenda

Meeting called by the Steering Committee - adopted resolution establishing meeting schedules on 8/13/22 (Art V Sect 4; Art VI Sect 2).

## Amended Agenda:

1. Call to Order at 6:42 p.m.
2. Prayer
3. Pledges
4. Roll Call
  - a. Roll call was conducted and a quorum is present
5. Approval of Substitute Agenda
  - a. Motion made by John Wertz (69) to amend the agenda
  - b. 2<sup>nd</sup> by Dale Inman (27)
  - c. Discussion called for by Jon Bouche (VC). No discussion.
  - d. Motion passes by unanimous voice vote
6. Approval of Minutes from 8/13/2022 CEC Meeting
  - a. Motion by Dale Inman (27) to adopt the minutes
  - b. 2<sup>nd</sup> by Kent Frappier (2)
  - c. Discussion called for by Jon Bouche (VC). No discussion.
  - d. Motion passes by unanimous voice vote
7. 2020 Bylaws Acceptance
  - a. POI – Dennis Tibbs (76) - what is the advantage of adopting the 2020 Bylaws?
  - b. Jon Bouche (VC) provided opinion based on an opinion letter from Steve Evans – State Republican Rules Committee Chair.
  - c. Motion made by Dale Fessenden (17) to adopt the 2020 Bylaws (located here: [https://drive.google.com/file/d/1VT\\_h9mA-07Fkn3UF-49XfvH0koPjI5Ym/view](https://drive.google.com/file/d/1VT_h9mA-07Fkn3UF-49XfvH0koPjI5Ym/view))
  - d. 2<sup>nd</sup> by Dale Inman (27)
  - e. POI by Kim Weber (97) – the comment was not in reference to this topic and was ruled out of order by Jon Bouche (VC)
  - f. POI by Steve Lawrence (48) on mediation process
  - g. Call to Question by Dale Inman (27)
  - h. POI by Tammy Kelter (35) on mediation process
  - i. POI by Susan Carranza (49) on 2020 Bylaws
  - j. POI by Cathy Locetta (71) question on mediation process and can we operate as two separate groups?
  - k. Discussion called for by Jon Bouche (VC). No additional discussion.
  - l. Motion passes by unanimous voice vote
8. Vacancy Report: Reconfirm Appointments for Each Appointee
  - a. Reconfirming Precinct appointees under the 2020 Bylaws for all new PC chairs was done by Allison Winter (59) and Vacancy Chair.
    - i. Sherry Tavel (95)
    - ii. Jennifer Bowling (62)
    - iii. Jackie Williams (107)
    - iv. Patrick Teich (111)
    - v. Diane Campbell (104)
    - vi. Stephanie Cox (98)



- vii. Mary Lewis (94)
- viii. Thomas Bartley (103)
- ix. Caleb Smith (26)
- x. Gwen Withrow (72)
- xi. Stephen Foster (80)
- xii. Mara Waser (92)
- xiii. Bobby Bodenhamer (54)
- xiv. Stephanie Schwantes (101)

~~b. All new Precinct Chairs listed above pass by unanimous voice vote.~~

**January 3, 2023 – Amended to All new precinct chairs listed above were voted on individually and each received a unanimous voice vote.**

- c. POI by Adrian Kiser (66) – how many precinct positions are open? The response was none.
- d. Allison Winter (59, Vacancy Chair) read her report – **Exhibit A**
- e. Motion made by Ginger Russell (74) to appoint Jon Bouche (VC) to file a complaint if needed based on information received via a FOIA request with the Secretary of State in reference to the required per the new Precinct Chair report filing by the MCRPTX Chairman.
  - i. 2nd by Kim Weber (97)
  - ii. Jon Bouche (VC) called for discussion. No discussion.
  - iii. Motion passes by unanimous voice vote
- 9. Officer Reports (Chairman, VP, Secretary- minutes approval, etc, Treasurer)
  - a. Chairman – Not present
  - b. Vice Chairman – Updates provided when discussing the 2020 Bylaws
  - c. Secretary
    - i. New Google document site was created to store meeting documents and precinct chair list as I am still unable to gain access to the main site. <https://sites.google.com/view/mcrptx-documents/home>
    - ii. Reminder for Committee Chair's to send in Committee reports 3 days prior to CEC meeting.
  - d. POI by Kent Frappier (2) – when will Raquel Lewis and the Chairman provide the information the new Secretary needs to do her job? Jon Bouche (VC) stated that is unknown at this time.
  - e. Treasurer
    - i. **Exhibit B – MCRP 2022-2023 Biennium Income Statement**
    - ii. ~\$2k spent on rent and some office supplies. Gearing up for Get out the Vote (GOTV)
    - iii. POI by Ginger Russell (74) – question on why the copier expense varies
    - iv. Charles Shirley (Treasurer) – catch up payments from prior months
    - v. Motion made by Dale Inman (27) to approve the budget report
    - vi. 2<sup>nd</sup> by John Wertz (69)
    - vii. Jon Bouche (VC) called for discussion. No discussion.
    - viii. Budget report is approved by unanimous voice vote

- ix. POI by DJ Fike (102) – has everything been paid? Yes, but we are still waiting on receipts from Susan Johnson (20) and/or Chairman.
  - x. POI by Adrian Kaiser (66)– who has ownership of the bank account? Response is the CEC does.
10. Motion by Adrian Kaiser (66) to pause the meeting to let the School Board Candidates speak. 2<sup>nd</sup> by Kim Weber (97).
- a. Misty Odenweller, Tiffany Nelson and Melissa Dungan were in attendance and spoke briefly
11. Victory Committee Report
- a. John Wertz (69) and Victory 2022 Chair, reviewed the estimated expenses for mailers, Push Cards, Texting – **Exhibit C**
  - b. Estimated grand total \$19,190 as of now but could go as high as \$25,000.
  - c. John Wertz (69) asked for a motion to be made to pass the estimated budget of \$25,000
  - d. Dale Fessenden (17) made the motion to adopt the Victory Committee proposed budget
  - e. 2<sup>nd</sup> by Dale Inman (27)
  - f. Motion passes by voice vote where the I's have the majority
  - g. Adrian Kaiser (66) was opposed
12. Add Standing Committees and affirm Chairs as appointed by Steering Committee.
- a. Revert to the 2020 Bylaws vs the 2022 Bylaws
  - b. Different committees between the two Bylaws are: legislative, Training & Support, Communications and Victory committees.
  - c. Robert Walker (87) makes a motion to adopt the committees in the 2020 Bylaws and the Committee Chair's who are already elected.
  - d. 2<sup>nd</sup> by Kenneth Earnest (6)
  - e. Motion passes by unanimous voice vote
  - f. Robert Walker (87) makes motion to create the additional 4 standing committees (Legislative, Training & Support, Communications and Victory) under the 2020 Bylaws and the Committee Chair's who are already elected.
  - g. 2<sup>nd</sup> by Kent Frappier (2)
  - h. Motion passes by unanimous voice vote
13. Committee Reports:
- a. Headquarters – Provided by Nelson Reyes (4) and read by Jon Bouche (VC). **Exhibit D**
  - b. Elections – Provided by George Hyde (100) and read by Jon Bouche (VC) – **Exhibit E**
  - c. Communications – provided by Lisa Railey and read by Jon Bouche (VC) **Exhibit F**
  - d. Legislative – provided and read by Bonnie Lyons; See **Exhibit G**
  - e. Resolutions – provided by Neda Henery (108) and read by Jon Bouche **Exhibit H**

- f. POI – Allison Winter (59) – How will this fall under the 2020 Bylaws – i.e. non-members. Jon Bouche (VC) – that is a good question that will need to be researched.
  - g. Marketing/PR - Kim Weber (97) and Melinda Olinde (89) provided update
    - i. Name Badges – order to be placed
    - ii. If you need help with ordering business cards, reach out to Kim
    - iii. Working on draft document to be used for introductions to your precincts
    - iv. Creating more of a presence on the social media platforms. Any ideas send them to Melinda Olinde. Purpose is to engage voters.
    - v. Will be working with Robert Walker (87) on ways to post to all social media platforms at once.
  - h. Community – Bob Bagley provided update
    - i. Working on getting into churches
    - ii. Will have a table at the Youth summit
    - iii. Learn how to be a voter registrar, reach out to Bob
    - iv. Parades – Go Texan parade in Conroe in May 2023 and 4<sup>th</sup> of July in The Woodlands.
14. Steering Committee Budget Presentation
- a. Charles Shirley (Treasurer) handed out the proposed budget through 2022. **Exhibit I**
  - b. Starting at \$51,305. After GOTV and other expenses, balance would be estimated at \$16,360.
  - c. Fundraising will be important
  - d. Charles Shirley asked that a motion be made to pass this proposed budget.
  - e. Robert Walker (87) made a position to adopt the to adopt the proposed budget
  - f. 2<sup>nd</sup> by Scott Robbins (33)
  - g. Motion passes by unanimous voice vote
15. New Business
- a. POI Dennis Tibbs (26) – Mediation process – when is it and where?
  - b. Jon Bouche (VC ) stated the mediation is on Sept 16 at a site TBD. Mediator will be Matt Rinaldi and one other.
  - c. They have asked for 3 attendees from each side
  - d. Kent Frappier (2) made a motion to have Jon Bouche (VC) attend the mediation meeting
    - i. 2<sup>nd</sup> by Scott Robbins
    - ii. POI by Adrian Kaiser (66) – is that allowed? Yes, by Jon Bouche (VC) and the CEC body
    - iii. POI by Kristen Plaisance (37) – is it better or worse for Jon Bouche to be there?
    - iv. POI by Allison Winter (59) – will they know in advance who is coming from each side?
    - v. Jon Bouche (VC) called for discussion to end.
    - vi. Motion passes by unanimous voice vote

- e. Dennis Tibbs (76) makes a motion to vote on the other 2 attendees
  - i. Susan Carranza (49) asked to amend to add 2 alternates.
  - ii. 2<sup>nd</sup> by Steve Lawrence (48)
  - iii. Motion with amendment passes by unanimous voice vote
  - iv. Scott Robbins (33) nominates John Wertz (69)
  - v. 2<sup>nd</sup> by Steve Lawrence (48)
  - vi. John Wertz (69) accepts nomination
  - vii. John Wertz (69) is selected by unanimous voice vote
  - viii. Betty Anderson (31) nominates for Allison Winter (59) to attend
  - ix. 2<sup>nd</sup> by Gwen Withrow (72).
  - x. POI – Dale Fessenden (17) - Can there be spectators. Jon Bouche (VC) responded with I don't know.
  - xi. Jon Bouche (VC) calls for discussion. No discussion.
  - xii. Allison Winter (59) accepts the nomination
  - xiii. Allison Winter (59) is selected by unanimous voice vote
  - xiv. John Wertz (69) nominates Robert Walker (87) as alternate
  - xv. 2<sup>nd</sup> by Tammy Kelter (35)
  - xvi. Jon Bouche (VC) calls for discussion. No discussion.
  - xvii. Robert Walker (87) accepts nomination as alternate
  - xviii. Robert Walker (87) is selected by unanimous voice vote as alternate
  - xix. Ginger Russell (74) nominates DJ Fike (102) as alternate
  - xx. 2<sup>nd</sup> by Cathy Locetta (71)
  - xxi. Jon Bouche (VC) calls for discussion. No discussion
  - xxii. DJ Fike (102) declines the nomination
  - xxiii. Dale Fessenden (17) nominates Kenneth Earnest (6) as alternate
  - xxiv. 2<sup>nd</sup> by Cathy Locetta (71)
  - xxv. Jon Bouche (VC) called for discussion. No discussion.
  - xxvi. Kenneth Earnest (6) accepts nomination as alternate
  - xxvii. Kenneth Earnest (6) is selected by unanimous voice vote as alternate
- f. DK Fike (102) presented Resolution - Revoke the Establishment and Organization of Precinct Executive Committees based on Justice of the Peace Precincts. **Exhibit J**
  - i. DJ Fike (102) makes a motion to adopt the resolution
  - ii. John Wertz (69) asked for an amendment to amend Steve Edwards to Steve Evans.
  - iii. 2<sup>nd</sup> by Kim Weber
  - iv. Jon Bouche (VC) called for discussion. No discussion
  - v. Resolution with amendment passes by unanimous voice vote
- g. Adrian Kaiser (66) presented Resolution – Involving Emergency and Special Meetings. **Exhibit K**
  - i. Adrian Kaiser (66) makes a motion to adopt the resolution
  - ii. 2<sup>nd</sup> by Scott Robbins (33)
  - iii. Dennis Tibbs (76) asked for amendment to be in person meetings only.

- iv. Adrian Kaiser (66) provided the resolution is defining the term emergency and should still be within the RPT rules for in-person meetings.
- v. POI by Kim Weber (94) - will these be opened to the public?
- vi. POI by DJ Fike (102) Can this resolution be specifically for emergency meetings.
- vii. Dennis Tibbs (76) withdrew his amendment.
- viii. Jon Bouche (VC) called for discussion. No discussion
- ix. Resolution passes by unanimous voice vote
- h. Jon Bouche (VC) read a petition to the body related to the 2020 - 2022 Bylaws. **Exhibit L**
- i. Resolution to Compel County Chairman Bryan Christ to Fulfill his Duties as County Chairman of the Montgomery County Republican Party **Exhibit M**
  - i. Jon Bouche (VC) read the resolution to the body.
  - ii. Scott Robbins (33) requests an amendment to change "request" to "demand"
  - iii. DJ Fike (102) makes a motion to adopt the resolution with the amendment
  - iv. 2<sup>nd</sup> by Adrian Kaiser (66)
  - v. Jon Bouche (VC) called for discussion. No discussion
  - vi. Resolution passes by unanimous voice vote
    - 1. Updated on 9/7/2022 – Jon Bouche (VC) received a text to change a vote from I to Nay for Josh Graff (40).
- j. Robert Walker (87) presents Resolution to End Electronic Meetings unless they Comply with RPT rule 8J and the 2020-2022 Bylaws. **Exhibit N**
  - i. Robert Walker (87) makes a motion to adopt the resolution.
  - ii. 2<sup>nd</sup> by DJ Fike (102)
  - iii. Dennis Tibbs (76) requests amendment the title to include MCRPTX Bylaws.
  - iv. Jon Bouche (VC) called for discussion. No discussion
  - v. Resolution with amendment passes by unanimous voice vote
- k. POI – Ginger Russell (74) – how many petitions to sign? Response is there are 2.
- l. Allison Winter (59) makes a motion affirm Ann Kate's resignation on June 7th.
- m. 2<sup>nd</sup> by Scott Robbins (33)
- n. Jon Bouche (VC) called for discussion. No discussion
- o. Motion passes by unanimous voice vote
- p. Allison Winters (59) makes a motion for the Chair to notify the Secretary of the State of the new Precinct Chairs immediately.
- q. 2<sup>nd</sup> by Kent Frappier (2).
- r. Scott Robbins (33) requested amendment to motion include the new precinct chairs names. They are:
  - i. Sherry Tavel (95)
  - ii. Jennifer Bowling (62)

- iii. Jackie Williams (107)
  - iv. Patrick Teich (111)
  - v. Diane Campbell (104)
  - vi. Stephanie Cox (98)
  - vii. Mary Lewis (94)
  - viii. Thomas Bartley (103)
  - ix. Caleb Smith (26)
  - x. Gwen Withrow (72)
  - xi. Stephen Foster (80)
  - xii. Mara Waser (92)
  - xiii. Bobby Bodenhamer (54)
  - xiv. Stephanie Schwantes (101)
  - s. Jon Bouche (VC) called for discussion. No discussion
  - t. Motion with amendment passes by unanimous voice vote
  - u. Robert Walker (87) presents Resolution Declaring the August 8/13/22 Meeting Petitioned by PCT 24 Chair James Byers as Out of Order and Invalid. **Exhibit O.**
    - i. Robert Walker (66) makes motion to adopt the resolution
    - ii. 2<sup>nd</sup> by Mark Pruitt (84)
    - iii. Jon Bouche (VC) called for discussion. No discussion
    - iv. Resolution passes by unanimous voice vote
  - v. POI by DJ Fike to remind all Precinct Chairs that resources are available on the Main MCRPTX website - <https://mcrptx.org/precinct-chair-resources>. Password is needed and was provided in the meeting. Reach out to Steering Committee or Training Support Chair (Karen Zeller) if you need the password again.
16. Adjourn at Completion of Agenda
- a. Scott Robbins (33) makes a motion to adjourn
  - b. 2<sup>nd</sup> by Adrian Kaiser (660)
  - c. Meeting adjourned at 8:51 p.m.

**RESOLUTION DECLARING THE AUGUST 13, 2022 MEETING PETITIONED BY PCT 24  
CHAIR JAMES BYERS AS OUT OF ORDER AND INVALID**

Whereas, the meeting petitioned by Pct.24 Chair James Byers for August 13, 2022 lacked the required 20% of the C.E.C. signatures to petition the meeting as it only had 19 signatures;

Be it resolved that because that meeting does not comply with party bylaws, it is out of order and no business conducted in that meeting is valid and in effect up to and including any attempt to elect officers, fill vacancies or appoint sub-committee chairs.

A Resolution submitted for consideration to the  
Montgomery County Republican Party of Texas  
September 6, 2022

Title: Resolution to revoke the establishment and organization of Precinct Executive Committee based on Justice of the Peace precincts in Montgomery County, Texas, as established by Chairman Christ following the Organizational Meeting dated, July 19, 2022.

Whereas, the establishment of a Precinct Executive Committee is not authorized in the Montgomery County Republican Party of Texas Bylaws;

AND

Whereas, there is no precedent for the establishment of a Republican Precinct Executive Committee in Montgomery County;

AND

Whereas, the establishment of a Precinct Executive Committee (PEC) as described in TEC 171.071 and clarified by Election Advisory No. 2021-19 from Keith Ingram, Director of Elections, dated November 10, 2021 is tasked with the responsibility of making a “Party Nomination if Vacancy Occurs in a State or County Office That Would Not Normally be on the 2022 Ballot” (Appendix A)

AND

Whereas, Mr. Steve Evans, SREC, SD 28, Chairman-Rules Committee, Member-Election Integrity Committee explains in the following email,

**From:** [steve.evanstx@att.net](mailto:steve.evanstx@att.net) <[steve.evanstx@att.net](mailto:steve.evanstx@att.net)>

**Sent:** Monday, August 29, 2022 1:46 PM

**To:** Bouche, Jon P **Subject:** RE: TEC 171.072 Precinct Executive Committee

Jon,

A precinct executive committee would only be formed if for instance you had a county commissioner on the ballot for November or any other county office that only comprised a certain precinct and they were removed from the ballot under another section of code. That group of precinct chairs would form a committee for the purpose of replacing a name on the ballot for their precinct.

It would not be used for general party organization.”



AND

Whereas, the reason for the establishment of a Precinct Executive Committee as described above does not exist;

**Therefore, let it be resolved,** that all Republican Precinct Executive Committees (PEC) established in Montgomery County by Chairman Christ are hereby dissolved, all officers are relieved of duty, and all business conducted by said PECs is null and void.

Therefore, let it also be resolved that any future attempt to re-organize the Montgomery County Republican Party of Texas structure through the establishment of Precinct Executive Committee(s) must be approved by a two-thirds majority of the County Executive Committee and may only be established in accordance with the described purpose(s) authorized by TEC 171.071 and clarified by Election Advisory No. 2021-19 from Keith Ingram, Director of Elections, dated November 10, 2021 or any such clarifications published subsequent to this Resolution.

Submitted by DJ Fike

Passed/Rejected by the CEC on Sept. 6, 2022

Accepted by Staci Earnest, Secretary, \_\_\_\_\_

**RESOLUTION TO COMPEL COUNTY CHAIRMAN BRYAN CHRIST TO  
FULFILL HIS DUTIES AS COUNTY CHAIRMAN OF THE  
MONTGOMERY COUNTY REPUBLICAN PARTY**

Whereas, the Montgomery County Executive Committee recognizes and confirms that the Montgomery County Republican Party was formed in accordance with Texas Election Code 171.021 which states that a county party is formed in counties where the state party holds a Primary;

Whereas, the Montgomery County Republican Party operates under the authority of the relevant sections of the Texas Election Code and the entirety of the United States Constitution, Republican Party of Texas Rules, Montgomery County Republican Party Bylaws and where those rules are silent, Robert's Rules of Order in accordance with RPT Rule 5.;

Whereas, the County Party Chairman is the presiding officer over the business of the County Executive Committee and is therefore bound by the laws of our country, state and party rules as well as Robert's Rules of Order - **Newly Revised** (RONR);

Whereas, the Montgomery County Organizational Meeting that began on July 19, 2022, **with an adopted agenda**, was recessed and was then continued and completed on July 23, 2022 in a properly called and noticed Organizational Meeting that was completed within the 45 day deadline as prescribed in RPT Rule 8(e);

Whereas, Precinct Chair vacancies have been filled in accordance with party bylaws but have not been reported to the Secretary of State by the County Chairman as required in T.E.C. 171.024 (e) **and 172.118**;

Whereas, Chairman Christ has not maintained an updated list of Precinct Chairs in accordance with RPT Rule 8(h) and continues to try and replace Precinct Chairs **(9/6/22)** that have already been properly elected and appointed **(on 7/23/22 & 8/13/22)** to the County Executive Committee;

Whereas; Chairman Christ has caused the party to divide by calling dual meetings with competing agendas for the same date and at the same time in violation of RONR 8:2.1;

Whereas; Chairman Christ is improperly applying T.E.C. 171.072 regarding Precinct Executive Committees in an attempt to circumvent party rules, remove duly elected officers and change party structure;

Whereas; Chairman Christ continues to refuse to fulfill his statutory responsibility of presiding over the entire County Executive Committee so that the party business can be done in accordance with the laws of our state and the rules of our party(**TEC 171.022**);

Be it resolved that we the undersigned members of the Montgomery County Republican Party find that Chairman Christ is derelict in his statutory duties and is also in violation of party rules. We therefore demand that he comply and do his duty, resign, or that any and all remedies available under RPT Rule 8(k) be pursued by the Republican Party of Texas and/or the Montgomery County Republican Party.

**From:** GeneralCounsel <generalcounsel@sos.texas.gov>**To:** 'Ginger' <gingerdr@sbcglobal.net>  
**Cc:** GeneralCounsel <generalcounsel@sos.texas.gov>  
**Sent:** Friday, September 9, 2022 at 08:21:52 AM CDT  
**Subject:** RE: Public Information Request

Good morning,

Consistent with our September 1, 2022 email, please find the attached information relating to your request. The attached spreadsheet—which contains information extracted from the Office's reporting system—reflects a list of Montgomery County Republican Party precinct chairs that meet the following two conditions: (1) all precinct chairs flagged as winners that were moved over from the Office's candidate filing system to the Office's contact information system for 2022, including the date they were moved; and (2) any precinct chair changes made since the aforementioned action.

Kind regards,

Jennifer Williams

Legal Assistant to the General Counsel

Office of the Texas Secretary of State

PRECINCT	FIRST_NAME	LAST_NAME	SAVE_DATE	EFFECTIVE_DATE_OF_OFFICE
1	Barbara	Ray	6/23/2022	6/13/2022
3	Alexander	Chandel	6/23/2022	6/13/2022
5	Douglas	Taylor	6/23/2022	6/13/2022
6	Kenneth	Earnest	6/23/2022	6/13/2022
7	Rapunzel	Myers	6/23/2022	6/13/2022
8	William	Kercheval	6/23/2022	6/13/2022
9	Quentin	Smith	6/23/2022	6/13/2022
10	Mark	Frank	6/23/2022	6/13/2022
12	James	Metts	6/23/2022	6/13/2022
14	Danielle	Walters	6/23/2022	6/13/2022
15	Gary	Reynolds	6/23/2022	6/13/2022
16	Gregory	Long	6/23/2022	6/13/2022
17	Dale	Fessenden	6/23/2022	6/13/2022
18	Becky	Vance	6/23/2022	6/13/2022
19	Juanita	Simmons	6/23/2022	6/13/2022
20	Susan	Johnson	6/23/2022	6/13/2022
21	Alan	Moore	6/23/2022	6/13/2022
22	Anna	Greathouse	6/23/2022	6/13/2022
23	Scott	Baker	6/23/2022	6/13/2022
24	James	Byers	6/23/2022	6/13/2022
25	Wendy	Lynch	6/23/2022	6/13/2022
27	Dale	Inman	6/23/2022	6/13/2022
28	Kenneth	Walling	6/23/2022	6/13/2022
30	Matthew	Mitchell	6/23/2022	6/13/2022
31	Elizabeth	Anderson	6/23/2022	6/13/2022
32	Thomas	Gardner	6/23/2022	6/13/2022
33	Scott	Robbins	6/23/2022	6/13/2022
34	Kenneth	Allen	6/23/2022	6/13/2022
35	Tammy	Kelver	6/23/2022	6/13/2022
36	Paul	Crowson	6/23/2022	6/13/2022
37	Kristen	Plaisance	6/23/2022	6/13/2022
38	Thomas	Filbin	6/23/2022	6/13/2022
39	Brady	Walding	6/23/2022	6/13/2022
40	Joshua	Graff	6/23/2022	6/13/2022
42	Fred	Mallard	6/23/2022	6/13/2022
43	Charlotte	Belin	6/23/2022	6/13/2022
44	John	Schluter	6/23/2022	6/13/2022
45	Katherine	Rummell	6/23/2022	6/13/2022
46	Yvonne	Wunsche	6/23/2022	6/13/2022
47	Mark	Fusca	6/23/2022	6/13/2022

48	Steven	Lawrence	6/23/2022	6/13/2022
49	Susan	Carranza	6/23/2022	6/13/2022
50	Christina	Lightfoot	6/23/2022	6/13/2022
51	Victoria	D'Angelo-Tompkins	6/23/2022	6/13/2022
52	Jerral	Pearson	6/23/2022	6/13/2022
53	Christopher	Crawford	6/23/2022	6/13/2022
55	Sandra	Mobley	6/23/2022	6/13/2022
56	Srinivasa	Katta	6/23/2022	6/13/2022
57	Theresa	Saxton	6/23/2022	6/13/2022
58	Lana	Hazlett	6/23/2022	6/13/2022
59	Allison	Winter	6/23/2022	6/13/2022
60	Judi	Thomas	6/23/2022	6/13/2022
61	Donna	McAleer	6/23/2022	6/13/2022
63	Herschel	Williams	6/23/2022	6/13/2022
64	Roy	Jimenez	6/23/2022	6/13/2022
65	Dale	Bible	6/23/2022	6/13/2022
66	Adrian	Kiser	6/23/2022	6/13/2022
67	Kathryn	Ross	6/23/2022	6/13/2022
68	Theresa	Haag	6/23/2022	6/13/2022
69	John	Wertz	6/23/2022	6/13/2022
70	John	Munich	6/23/2022	6/13/2022
71	Catherine	Locetta	6/23/2022	6/13/2022
73	Ronnie	Trojanowski	6/23/2022	6/13/2022
75	Larry	Rogers	6/23/2022	6/13/2022
76	Dennis	Tibbs	6/23/2022	6/13/2022
77	Robert	Coats	6/23/2022	6/13/2022
78	Keith	Wagner	6/23/2022	6/13/2022
79	Thomas	Lancaster	6/23/2022	6/13/2022
81	Susan	Scruggs	6/23/2022	6/13/2022
82	Walter	Simms	6/23/2022	6/13/2022
83	Patricia	Carr	6/23/2022	6/13/2022
84	Mark	Pruitt	6/23/2022	6/13/2022
85	Daniel	Bingham	6/23/2022	6/13/2022
87	Robert	Walker	6/23/2022	6/13/2022
88	Frederick	Sunderman	6/23/2022	6/13/2022
90	John	Webb	6/23/2022	6/13/2022
93	Denise	Ebert	6/23/2022	6/13/2022
96	Raquel	Lewis	6/23/2022	6/13/2022
100	George	Hyde	6/23/2022	6/13/2022
106	Wesley	Doolittle	6/23/2022	6/13/2022
108	Neda	Henery	6/23/2022	6/13/2022

110	Jose	Pedraza	6/23/2022	6/13/2022
13	Laurie	Clifton	8/11/2022	6/13/2022
11	Marliese'	Stripling	8/11/2022	6/13/2022
29	Linda	Stuckey	8/11/2022	6/13/2022
74	Rajene	Russell	8/11/2022	6/13/2022
72	Martha	Kate	8/11/2022	6/13/2022
41	Marvin	Long	8/11/2022	6/13/2022
86	Glenn	Speight	8/11/2022	6/13/2022
89	Melinda	Olinde	8/11/2022	6/13/2022
91	Cora	Kerr	8/11/2022	6/13/2022
97	Kimberly	Weber	8/11/2022	6/13/2022
99	Suzanne	Rapattoni	8/11/2022	6/13/2022
102	Doris	Fike	8/11/2022	6/13/2022
105	Charles	Parada	8/11/2022	6/13/2022
109	Michael	Medved	8/11/2022	6/13/2022
2	Kent	Frappier	8/11/2022	6/13/2022
4	Nelson	Reyes	8/11/2022	6/13/2022



## RESOLUTION to CENSURE County Chairman Bryan Christ

**Whereas** The County Chairman, Bryan Christ, has not fulfilled his statutory duties to report all duly elected precinct chairs to the Secretary of State.

**Whereas** He has failed to recognize duly CEC appointed precinct chairs to the CEC, the Party and report them to the Secretary of the State.

**Whereas** he has failed to chair the regularly scheduled CEC meetings.

**Whereas** he has failed to recognize the duly elected officers and Steering Committee elected at the 7/23/2022 CEC meeting. He has failed to attend and chair the regularly scheduled Steering Committee meetings.

**Therefore, he has not fulfilled his duties as Chairman of the Montgomery County Republican Party.**

**Let it be resolved** that County Chairman Bryan Christ be censured by the Montgomery County Republican Party County Executive Committee and

**Let it further be resolved** that the censure be forwarded to the SREC to concur and impose both penalties.

Robert Walker  
Submitted by

87  
Precinct

12/6/2022  
Date Submitted

Adopted this 6<sup>th</sup> day of December, 2022 by the Montgomery County Republican Party.

Bryan Christ  
Secretary Signature



## **NOTICE OF CALL OF SPECIAL CEC MEETING**

Date/Time: December 6, 6:30 p.m.

Location: 1201 Lake Woodlands Dr., Suite 4020, The Woodlands, TX

Meeting Type: Special CEC Meeting

Stated Purpose: “Unity Meeting” seeking to resolve the issues dealing with appointed Precinct Chairs and elected officers of the Montgomery County Republican Party.

Called by: Robert Walker, and the Precinct Chairs listed in the Notice

Meeting Called by:

1. Robert Walker, Precinct 87 Chair
2. Kenneth Earnest, Precinct 06 Chair
3. John Wertz, Precinct 69 Chair
4. D.J. Fike, Precinct 102 Chair
5. Allison Winter, Precinct 59 Chair
6. George Hyde, Precinct 100 Chair
7. Dale Inman, Precinct 27 Chair, SREC SD-4 Committee Man
8. Neda Henery, Precinct 108 Chair
9. Kim Weber, Precinct 97 Chair
10. Herschel Williams, Precinct 63 Chair
11. Donna McAleer, Precinct 61 Chair
12. Dennis Tibbs, Precinct 76 Chair
13. Larry Rogers, Precinct 75 Chair

14. Kathryn Ross, Precinct 67 Chair
15. Ginger Russell, Precinct 74 Chair
16. Ronnie Trojanowski, Precinct 73 Chair
17. Scott Robbins, Precinct 33 Chair
18. Tammy Kelter, Precinct 35 Chair
19. Cathie Locetta, Precinct 71 Chair
20. Dale Fessenden, Precinct 17 Chair
21. Kent Frappier, Precinct 2 Chair
22. Betty Anderson, Precinct 31 Chair
23. Kristen Plaisance, Precinct 37 Chair
24. Steve Lawrence, Precinct 48 Chair
25. Joshua Graff, Precinct 40 Chair
26. Melinda Olinde, Precinct 89 Chair



**Special County Executive Committee Meeting Agenda  
In Person Meeting Only**

1201 Lake Woodlands Dr., Suite 4020, The Woodlands, TX  
December 6, 2022 at 6:30pm

1. Call to Order at 6:30 p.m. by Bryan Christ (Chairman)
2. Prayer led by Patricia Carr
3. Pledges by Jon Bouche (Vice Chairman)
4. Roll Call
  - a. Present officers are: Bryan Christ (Chairman), Jon Bouche (Vice Chairman), and Staci Earnest (Secretary)
  - b. Bryan Christ (Chairman) asked Mark Frank to conduct the roll call, the CEC asked Staci Earnest (Secretary) to conduct the roll call.
  - c. Discussion took place about the secretary and roll call. Several objections were heard and by a majority voice vote, the CEC stated that Mark Franks is not the secretary and that Staci Earnest (Secretary) should conduct the roll call.
  - d. Staci Earnest (Secretary) completed the roll call for the Special CEC meeting.
  - e. A quorum is present. **Exhibit A**
  - f. John Wertz (69) was recognized by Bryan Christ (Chairman). After Chairman Christ stated that Mark Frank (10) was the duly elected Secretary, several CEC members made points of order challenging that ruling including Robert Walker(87), Steve Lawrence(48), Scott Robbins(33) and John Wertz (69). Wertz (69) then appealed the decision of the chair. The Chairman then said that the meeting was going to stand at ease but his call to be "at ease" was also objected to by Wertz(69), Walker(87), Frappier(2), Robbins(33), Lawrence(48) and several others. Wertz(69) continued to appeal the decision of the chair three times in total all of which were seconded by Precinct Chair Scott Robbins (33) all

- three times. Since Chairman Christ then refused to put John Wertz (69) appeal to a vote of the body, John Wertz (69) citing Robert's Rules of Order 62:9, appealed to the CEC for a vote and his appeal was upheld unanimously. So by a unanimous vote of the CEC, the Chairman's statements regarding Mark Frank(10) being the Secretary and that his attempt to put the meeting "at ease" during debate were all overruled.
- g. Chairman Christ announced again that he was going to have the group stand at ease but this was again objected to by several Precinct Chairs including John Wertz (69), Scott Robbins (33), Robert Walker (87), Kent Frappier (2) and Steve Lawrence (48) among others.
  - h. When the Chairman persisted that the meeting was standing "at ease", the Wertz(6), Walker(87) and others once again objected and insisted that the meeting move forward with the duly elected Secretary, Staci Earnest, being recognized. Robert's Rules of Order 8:2.4, states: "A meeting is said to stand at ease if the chair, **without objection**, simply permits a brief pause without declaration of a recess." Since there were many objections to the Chairman's statement that the CEC was "at ease" while the CEC was confronting the Chair about his false pronouncements regarding the Secretary, the meeting was not "at ease" according to Robert's Rules of Order.
  - i. When Chairman Christ refused to move the meeting forward, John Wertz (69) then cited Robert's Rules of Order 62:10 and declared that the Chairman had abandoned the Chair for refusing to perform his duties.
  - j. 2nd by Scott Robbins (33).
  - k. John Wertz (69) called for a vote of the CEC and by a unanimous voice vote, Chairman Christ was removed as Chair of the meeting.
  - l. Scott Robbins (33) nominated Jon Bouche to chair the remainder of the meeting and the body voted unanimously (voice vote) to have Jon Bouche chair the remainder of the Special Meeting for the official record.
  - m. Fred Sunderman (88) POI – asked to move on with the agenda
  - n. Motion - Point of Personal Privilege by Neda Henery (108) that the guests who were making noise relocate to the rear of the room.
  - o. 2<sup>nd</sup> by Kenneth Earnest.
  - p. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - q. Motion passes by unanimous voice vote
  - r. Motion by Adrian Kaiser (66) to have a standing vote for adjournment of the meeting.
  - s. 2<sup>nd</sup> by Robert Walker (87).
  - t. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - u. Motion passes by unanimous voice vote.
  - v. Motion by Kenneth Earnest (6) that Sherry Tavel (95) be acknowledged as the party Parliamentarian for the Special Meeting since Chairman Christ had brought his attorney Eric Opeila and had announced that Mr. Opeila would be the parliamentarian for the meeting to replace Sherry Tavel (95).
  - w. 2<sup>nd</sup> by John Wertz (69).

- x. Jon Bouche (Vice Chairman) called for discussion. No discussion.
- y. Motion passes by unanimous voice vote.
- z. Motion by John Wertz (69) to recognize Pete Goeddertz as the Sergeant at Arms.
- aa. 2<sup>nd</sup> by Scott Robbins (33).
- bb. Jon Bouche (Vice Chairman) called for discussion. No discussion.
- cc. Motion passes by unanimous voice vote.
- dd. Motion by Scott Robbins (33) for Mark Frank (10) to be removed from the front desk. Mark Frank (10) became combative and indicated that no matter what the body voted, he would not move and stated, "You will have to physically remove my fat ass from up here because I am not moving." so Jon Bouche (Vice Chairman) asked that not be done so that the meeting could move forward in a peaceful and orderly way without incident.
- ee. Scott Robbins (33) withdrew the motion.
- 5. Discuss and take action regarding County Chairman Bryan Christ's refusal to acknowledge the County Executive Committee Elections of the following Precinct Chairs in accordance with party bylaws (MCRP Bylaws 2020-2022, Art. III, Sec 4.) and the Chairman's continued public pronouncements that these people have not been properly elected.

<b><u>Pct #</u></b>	<b><u>Precinct Chair Name</u></b>
26	Caleb Smith
54	Bobbi Bodenhammer
56	Jim Doyle
62	Jennifer Bowling
72	Gwen Withrow
80	Steven Foster
92	Mara Wasar
94	Mary Lewis
95	Sherry Tavel
98	Stephanie Cox
101	Stephanie Schwantes
103	Thomas Bartley
104	Diane Campbell

107	Jackie Williams
111	Patrick Teich

- a. Allison Winter (59) makes a motion for this item. The motion is to disavow Chairman Christ's public pronouncements regarding the legitimacy of the Precinct Chairs listed on this agenda, as those Precinct Chairs were already appointed and confirmed by this body in accordance with the laws of this state and our party bylaws. I further move that this body declares Chairman Christ is derelict in his duties and in violation of the Texas Election Code for not filing these positions and that he update the Secretary of State roster, as well as all party resources, to include the names of the Precinct Chairs listed on this agenda item within the next 48 hours.
- b. 2<sup>nd</sup> from Mark Pruitt (84)
- c. Motion by Kristen Plaisance to conduct a roll call vote.
- d. Jon Bouche (Vice Chairman) called for discussion. No discussion.
- e. Roll call vote was conducted. The motion passes. **Exhibit A**
6. Discuss and take action regarding Chairman Bryan Christ's continued public pronouncements that the officers, Steering Committee, as well as Vacancy and Victory Committee Chairs elected by the County Executive Committee as listed below were not properly elected in accordance with the party bylaws.

**Officers:**

Vice Chairman – Jon Bouche

Secretary – Staci Earnest

Treasurer – Charles Shirley

**Steering Committee:**

George Hyde

Quentin Smith

Kenneth Earnest

Robert Walker

D.J. Fike

**Vacancy Chair:**

Allison Winter

**Victory Chair:**

John Wertz

- a. Motion by Scott Robbins (33) for this item. The motion is to disavow Chairman Christ's public pronouncements regarding the legitimacy of the Officers, Steering Committee, Vacancy Chair, Victory Chair and all

- other Committee Chairs as elected by this body. I also move that this body formally declares that all of the names listed on this agenda item were properly elected and appointed in accordance with the laws of this state and our party bylaws. I further move that this body declares that Chairman Christ is derelict in his duties and demands that he update all party resources to include the names of the Officers, Steering Committee, Vacancy Chair and Victory Chair as listed on this agenda item within the next 48 hours.
- b. 2<sup>nd</sup> by Steve Lawrence (48).
  - c. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - d. Motion passes by unanimous voice vote.
7. Discuss and take action regarding Chairman Bryan Christ continuing to divide the party by calling multiple meetings at the same time and on the same date but in different locations.
- a. Motion by Robert Walker (87) to table this agenda item.
  - b. 2<sup>nd</sup> by Fred Sunderman (88)
  - c. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - d. Motion passes by unanimous voice vote.
8. Motion Discuss and take action regarding Chairman Christ's continuing public pronouncements that the County Executive Committee Meetings are not valid if he simply chooses not to attend and declares them as "caucus meetings".
- a. Robert Walker (87) makes motion for this item. The motion is to disavow Chairman Christ's public pronouncements that the County Executive Committee Meetings are not valid if he chooses to simply not attend and declares them as "caucus meetings." I motion that this Body declares all the regularly scheduled CEC meetings as valid as all of these meetings have been scheduled and noticed properly in accordance with the MCRPTX 2020-22 Bylaws that are in place.
  - b. 2<sup>nd</sup> from Ginger Russell (74).
  - c. POI by Fred Sunderman (88) on the website. Jon Bouche (Vice Chairman) stated that the official website for the Montgomery County Republican Party is [mctxgop.org](http://mctxgop.org)
  - d. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - e. Motion passes by unanimous voice vote.
9. Discuss and take action regarding Chairman Bryan Christ's having multiple complaints filed against him with the Secretary of State for multiple violations of election code by not reporting Precinct Chair vacancies and appointments in a timely manner (T.E.C. 171.024 e)
- a. Motion by Kenneth Earnest (6) for this item. The motion is that this body votes to confirm that Chairman Christ has knowingly violated the Texas Election Code for not reporting the names of Precinct Chairs to the Secretary of State in a timely manner, not maintaining an updated roster with the Secretary of state.
  - b. 2<sup>nd</sup> from Steve Lawrence (48).
  - c. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - d. Motion passes by unanimous voice vote.

10. Discuss and take action regarding Chairman Christ having criminal complaints filed against him for three (3) separate violations of Texas Penal Code (Sec. 37.10- Tampering with a government record) for falsely reporting the names of Precinct Chairs for precincts 26, 92, and 103 to the Secretary of State for the official record. Chairman Christ was notified repeatedly via email and was aware at the time that the people he was reporting to the Secretary of State were not elected in accordance with our Bylaws but he went ahead and registered those people with the Secretary of State to those positions anyway.
  - a. POI Fred Sunderman (88) asked that those emails from Bryan Christ be added to these meeting minutes on this topic. **Exhibit B**
  - b. Motion by Kenneth Earnest (6) on the item. The motion is that this body find that Chairman Christ has knowingly violated Texas Penal Code Section 37:10 ( Altering a Government Document) by reporting the names of people to the Secretary of State who were not properly elected by this body and that in eight (8) separate instances he reported people's names for positions that were not vacant.
  - c. 2<sup>nd</sup> by Kent Frappier (2).
  - d. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - e. Motion passes by unanimous voice vote.
11. Discuss and take action regarding removal of officers and Precinct chairs as well as rule changes that are under discussion by the Steering Committee.
  - a. Robert Walker (87) motion to table this item.
  - b. 2<sup>nd</sup> by Fred Sunderman (88).
  - c. POI by Kent Frappier (2) – how long until we get an answer? Robert Walker (87) responded with, in the next CEC meeting.
  - d. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - e. Motion passes by unanimous voice vote
12. Discuss and take action to supplement the SREC Report and Secretary of State complaints with these meeting minutes for consideration during adjudication
  - a. Motion by Scott Robbins (33) on this item. The motion is that we supplement the SREC RPT Rule 8 complaint documentation and the Secretary of State complaints with the meeting minutes and any other documentation from this Special Meeting.
  - b. 2<sup>nd</sup> from Neda Henery (108).
  - c. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - d. Motion passes by unanimous voice vote.
13. Discuss and take action regarding County Executive Committee Electing the County Chair in 2024 and to have this added to the legislative priority list for the party.
  - a. Motion by John Wertz (69) for this item. The motion is in consideration of what we are experiencing with our County Chairman, I move that this body makes having the County Chairman elected by the County Executive Committee a legislative priority and that we initiate a rule



- change within our bylaws to allow the County Executive Committee to elect the County Chair going forward.
- b. 2<sup>nd</sup> by Ginger Russell (74).
  - c. POI by Allison Winter (59) clarification of the party referenced in the motion. Response provided by Jon Bouche (Vice Chairman), the party is the Montgomery County Republican Party of Texas.
  - d. Jon Bouche (VC) called for discussion. No discussion.
  - e. Motion passes by unanimous voice vote
14. Discuss and take action regarding having the [www.mctxgop.org](http://www.mctxgop.org) website recognized as the official party website by the Republican Party of Texas and to have that link on the state party's County Party directory page.
- a. Motion by Scott Robbins (33) for this item. The motion is since this body has already voted that [www.mctxgop.org](http://www.mctxgop.org) is the official website and this website contains all updated information for the party, I move that we request the Republican Party of Texas to update the Montgomery County link on the State Party website and change it to [www.mctxgop.org](http://www.mctxgop.org) immediately
  - b. 2<sup>nd</sup> by Steve Lawrence.
  - c. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - d. Motion passes by unanimous voice vote
15. Discuss and take action on disciplinary action up to and including censure of Chairman Bryan Christ for any or all of the above-mentioned violations/issues.
- a. Motion by Robert Walker (87) for this item. Robert Walker (87) asked that Bryan Christ be allowed to speak to the CEC.
  - b. Bryan Christ stated that we are still at ease and he will speak once his meeting starts. Jon Bouche told Chairman Christ that we were not at ease since his call to put the meeting "at ease" was objected to by the body.
  - c. Scott Robbins (33) stated that Bryan Christ was dismissed from this meeting by the CEC.
  - d. Jon Bouche (Vice Chairman) twice asked Bryan Christ if he would like to speak to this motion.
  - e. Bryan Christ declined to speak to the motion.
  - f. Robert Walker (87) presented the resolution for the Censure. **Exhibit C**
  - g. 2<sup>nd</sup> by John Wertz (69).
  - h. POI Kent Frappier (2) what are the rules for censure?
  - i. Robert Walker (87) gave explanation of rule 44 of the Texas Republican Party to the CEC. Link to RPT Rules - <https://texasgop.org/rules/>
  - j. POI by Adrian Kaiser (66) – this is going to SREC? The response from Vice Chair Jon Bouche is "yes".
  - k. John Wertz (69) reminded the CEC that RONR 62.9-10 was invoked and is appealing on the comment that Bryan Christ (participant) stated this meeting is at ease.

- l. 2<sup>nd</sup> by Neda Henery (108).
  - m. Jon Bouche (Vice Chairman) called discussion.
  - n. POI by Scott Robbins (33) - Bryan Christ is not the Chair. Jon Bouche (Vice Chairman) stated that is correct.
  - o. No other discussion.
  - p. Motion passes by unanimous voice vote.
16. Adjourn at completion of Agenda
- a. Motion by Fred Sunderman (88) to adjourn the special meeting.
  - b. 2<sup>nd</sup> by Scott Robbins (33).
  - c. Jon Bouche (Vice Chairman) stated that anyone opposed to adjournment, please stand.
  - d. No one rose to stand.
  - e. Motion to adjourn passes
  - f. Meeting adjourned at 7:30 p.m.

**NOTE:** Following the meeting, Chairman Christ who had been consulting with his attorney, once again, made the assertion that the meeting was still “at ease”. As noted in the official minutes, the Chairman’s call to be “at ease” was objected to vigorously by the body and Chairman Christ was also told by the Vice Chair that the CEC was not “at ease” when he initially made that claim. To ensure that the matter was clearly addressed on video and for the record even though it was after the meeting was adjourned, Chair Scott Robbins addressed the Chairman Directly and quoted Robert’s Rules 8:2:4 and read it aloud which states: “A meeting is said to stand at ease if the chair, **without objection**, simply permits a brief pause without declaration of a recess.” Robbins then said, “There were many objections to your call to be at ease so we were not at ease.”



**Montgomery County Republican Party**  
**County Executive Committee Regular Schedule Meeting Agenda (Amended 12/21/2022)**  
1201 Lake Woodlands Dr., Suite 4020, The Woodlands, TX  
January 3, 2023 at 6:30pm

1. Convene
2. Prayer
3. Pledges
4. Roll Call
5. Call to Order
6. Approval of the Agenda
7. Vacancy Committee Report
8. Officer Reports
  - a. Chairman
  - b. Vice Chairman
  - c. Secretary
    - i. Approval of minutes from the December 6, 2022 Special meeting
    - ii. Approval of minutes from the December 6, 2022 Regular meeting
  - d. Treasurer
9. Good of the Order
10. Committee Chairman Reports
  - a. Committee Chairs - Send reports to Staci Earnest @slearnes@me.com or post in your committee folder by **December 30, 2022**
  - b. Communications
    - i. Web and email user agreement
  - c. Rules
    - i. Rule changes
  - d. Resolutions (last)
    - i. Resolution process
11. New Business
12. Adjourn at completion of Agenda



**Montgomery County Republican Party**  
**County Executive Committee Regular Schedule Meeting Minutes**  
 1201 Lake Woodlands Dr., Suite 4020, The Woodlands, TX  
 January 3, 2023 at 6:30pm

1. Convene at 6:34 p.m.
2. Prayer by Patricia Carr (83)
3. Pledges conducted
4. Roll Call conducted
  - a. Quorum is present – **Exhibit A**
5. Call to Order
6. Approval of the Agenda
  - a. Motion by Scott Robbins (33) to approve
  - b. 2<sup>nd</sup> by John Wertz (69)
  - c. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - d. Motion passes by unanimous voice vote
7. Vacancy Committee Report
  - a. Dale Fessenden (17) provided the report – **Exhibit B**
  - b. Nominations of Vacant Precinct Chairs
  - c. Lauren Vickers – Precinct Chair nominee for Precinct 39 provided summary of qualifications
    - i. Motion by Dale Fessenden (17) to accept nomination of Lauren Vickers to Precinct 39
    - ii. 2<sup>nd</sup> by Ginger Russell (74)
    - iii. Jon Bouche (Vice Chairman) called for discussion. No discussion.
    - iv. By individual unanimous voice vote, Lauren Vickers was elected
  - d. Bill Philibert - Precinct Chair nominee for Precinct 42 provided summary of qualifications
    - i. Motion by Dale Fessenden (17) to accept nomination of Bill Philibert to Precinct 42
    - ii. 2<sup>nd</sup> by Kent Frappier (2)
    - iii. Jon Bouche (Vice Chairman) called for discussion. No discussion.
    - iv. By individual unanimous voice vote, Bill Philibert was elected

- e. Blake Hall – Precinct Chair nominee for Precinct 82 provided a summary of qualifications
  - i. Motion by Dale Fessenden (17) to accept nomination of Blake Hall to Precinct 82
  - ii. 2<sup>nd</sup> by John Wertz (69)
  - iii. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - iv. By individual unanimous voice vote, Blake Hall was elected
- f. Tanya Martinez – Precinct Chair nominee for Precinct 90 provided a summary of qualifications
  - i. Motion by Dale Fessenden (17) to accept nomination of Tanya Martinez to Precinct 90
  - ii. 2<sup>nd</sup> by Suzanne Rapattoni (99)
  - iii. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - iv. By individual unanimous voice vote, Tanya Martinez was elected
- g. Judge Laird provided the swearing in of the new Precinct Chairs
- h. Precinct 10 vacant and the Vacancy Committee is seeking candidates
- 8. Officer Reports
  - a. Chairman
    - i. None provided as Chairman was not present
  - b. Vice Chairman
    - i. Report provided by Jon Bouche (Vice Chairman) **Exhibit C**
  - c. Secretary
    - i. Approval of minutes from the December 6, 2022 Special meeting
      - 1. Motion by Scott Robbins (33) to approve
      - 2. 2<sup>nd</sup> by Dale Fessenden (17)
      - 3. Jon Bouche (Vice Chairman) called for discussion. No discussion.
      - 4. Motion passes by unanimous voice vote.
    - ii. Approval of minutes from the December 6, 2022 Regular meeting
      - 1. Motion by Steve Lawrence (48) to approved
      - 2. 2<sup>nd</sup> by Kristen Plaisance (37)
      - 3. Jon Bouche (Vice Chairman) called for discussion. No discussion.
      - 4. Motion passes by unanimous voice vote.
  - d. Treasurer
    - i. Charles Shirley (Treasurer) provided the report on Income Statement – **Exhibit D**
    - ii. Quarterly report is due to the Texas Ethics Commission. Charles has been removed of his ability to file the report by Bryan Christ (Chairman). Charles is working with General Counsel on this item.
    - iii. POI by Kristen Plaisance (37) inquired about the status of the Headquarters location.
      - 1. Mr. Poole (Landlord) provided the information to Charles Shirley (Treasurer) that Bryan Christ (Chairman) was moving out of the facility.
      - 2. We are continuing to pay the rent for the headquarters. The Corporate Account has no \$ to pay the rent which is really where these types of expenses should be paid from. The General fund does have \$ to pay the rent.
      - 3. Mr. Poole (Landlord) has indicated that he can get more rent for potential future occupants.

4. Based on this information, the Steering Committee agreed to have Charles Shirley reach out to Mr. Poole (Landlord) to negotiate a new lease. Nothing has been pursued further at this time as Mr. Poole was not willing to discuss further.
5. Steering Committee members have requested the new door code several times to Mark Frank, Steve Baker (23) and Bryan Christ (Chairman). As of today, the door codes have not been received.
- iv. POI by Kent Frappier (2), has a committee investigated securing a new space? The response was no, not at this time.
- v. POI by Fred Sunderman (88), is the equipment/assets secured? The response was we don't know at this time. Who is the lease owner? The response was Bryan Christ (Chairman).
- vi. POI by George Hyde (100), are you confident if Bryan Christ (Chairman) is the lessor, that he will notify the CEC within 30 days of the move? The response is no, we are not confident.
- vii. POI by Susan Carranza (49), in letter/email from Bryan Christ dated 12/21/2022 (that was shared indirectly) he states he was given \$20k. Where did that \$\$ go? The response was we don't know.
- viii. POI by DJ Fike (102), Bryan Christ (Chairman) did file a report under the Republican Vacancy Committee PAC
- ix. POI by Robert Walker (87), could Bryan Christ be referring to the \$20k for Get out the Vote? The response was it is possible.

#### 9. Good of the Order

- a. Jon Bouche (Vice Chairman) provided a statement that he believes it would be in the best interest of the MCRPTX that he should resign as Vice Chairman and the CEC should consider Dale Inman (27/SREC). Jon Bouche will continue to work Communications Committee.
  - i. POI by Fred Sunderman (88), would Dale Inman (27/SREC) need to go through the voting process? The response was yes.
  - ii. Jon Bouche (Vice Chairman) called for discussion on the topic
    1. Susan Carranza (49) Any ethical issues with Dale Inman (27/SREC) being on SREC? The response was no.
    2. Dennis Tibbs (76) and Larry Rogers (75), that means you must resign, correct. The response was yes.
    3. Kristen Plaisance (37), does this put us in a position that we will not have a legitimate VP? The response was the Republican party of Texas states the county party need to work this out.
    4. Fred Sunderman (88) my concern is that we are just whacking moles through this situation.
    5. Kent Frappier (2) what prevents them from doing the same to Dale Inman (27/SREC)? The response was nothing.
    6. Dale Inman (27/SREC), could have state convention impacts
    7. George Hyde (100) supports Jon's decision but doesn't feel that this will resolve the problem. Argument for legitimacy
    8. Scott Robbins (33) is opposed with Jon resigning as a strategic move

9. Steve Lawrence (48) supports Jon and his decision
10. Fred Sunderman (88) didn't state convention decided there would be a different way to elect the party chairman? The response was that has not changed at this time.
11. Herschel Williams (63), we are the legitimate CEC. If we vote on something tonight, we need to stand by it.
12. Kent Frappier (2), if a PC chair is not present for 4 consecutive regular meetings, can be removed.
13. It was note that the Secretary will compile attendance list
14. Ginger Russell (74), many of us have been in this fight for some time.
15. Blake Hall (82) has been coming to these meetings as a guest. It is time to get people to vote. He wishes Jon would remain as Vice Chairman.
- iii. Motion by Kent Frappier (2) to table the notion of Jon Bouche (Vice Chairman) resigning until we get Precinct Chair attendance and resolution from the Republican Party of Texas.
- iv. Amendment by Fred Sunderman (88) that we need to hear from the Secretary of State.
- v. 2<sup>nd</sup> by Dale Inman (27/SREC)
- vi. POI by Kristen Plaisance (37), how many undisputed precinct chairs do we have? The response was that we need to determine that answer.
- vii. POI by Scott Robbin (33), we will appear that the county party will be more splintered
- viii. POI by Susan Carranza (49), how are the new precinct chairs getting reported to the Secretary of State? The response was that they will not be reported by Bryan Christ (Chairman) as he has been refusing to acknowledge the CEC.
- ix. The next regular scheduled CEC meeting is March 7, 2023.
- x. Jon Bouche (Vice Chairman) called for a vote on the motion made by Kent Frappier (2) to table the notion of Jon Bouche (Vice Chairman) resigning.
- xi. Motion passes by unanimous voice vote

## 10. Committee Chairman Reports

### a. Communications

- i. Report provided by Stephanie Cox (98) – **Exhibit E**
- ii. Web and email user agreement presented by DJ Fike (102) – **Exhibit F**
  1. POI by George Hyde (100), the queue of messages going out, do we still have the bottleneck of messages going out? Response - 24 emails per month can go out without increasing our fees.
  2. POI by Susan Carranza, (49), in section lai, what is the definition of good standing? The response is that an individual cannot be on the censured list.
  3. POI by Susan Scruggs (81), what email list are we using? The response was it has over 4800 people on it
  4. POI by Kim Weber (97), can the list be sorted by Precinct? The response was no, not at this time.
  5. Motion by DJ Fike (102) to accept the agreement.
  6. 2<sup>nd</sup> by Neda Henery (108)
  7. Jon Bouche (Vice Chairman) called for discussion. No discussion.

8. Motion passes by unanimous voice vote.
- b. Legislative
  - i. Report by Bonnie Lyons (Legislative Chair)– **Exhibit G**
- c. Marketing
  - i. Report by Kim Weber (97) – **Exhibit H**
  - ii. Need volunteers to help with social media – reach to Kim Weber (97)
  - iii. PMS # for the red color is A9000
- d. Education
  - i. Report by Ginger Russell (74) – **Exhibit I**
- e. Fundraising
  - i. Report provided by Jackie Williams (Fundraising Chair)
  - ii. Need volunteers. First meeting to be in the next few weeks
  - iii. Ideas – Bowling, Golf, BBQ event, Burgers and Beans, Family Night
  - iv. Call Jackie at 713-240-1698 to volunteer
- f. Rules
  - i. Rule changes were tabled to the next meeting by Robert Walker (87) – **Exhibit J**
- g. Resolutions
  - i. Resolution process presented by Neda Henery (108) - **Exhibit K**
  - ii. Motion by Neda Henery (108) to approve the process
  - iii. 2<sup>nd</sup> by DJ Fike (102)
  - iv. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - v. Motion passes by unanimous voice vote.

## 11. New Business

- a. Motion by Suzanne Rapattoni (99) to amend the minutes on September 6, 2022 in Section 8 – Vacancy Report to read “All new precinct chairs listed above were voted on individually and each received a unanimous voice vote.”
  - i. 2<sup>nd</sup> by George Hyde (100)
  - ii. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - iii. Motion passes by unanimous voice vote.
  - iv. Secretary to amend the minutes and post to website – **completed on 1/4/2023**
- b. Gwen Withrow (72/SREC) asked to address the CEC
  - i. She will be in Austin next week when session kicks off.
  - ii. Dale Inman (27/SREC) and she fought as hard as they could to get the 6 PCs recognized at the SREC meeting last month.
- c. John Wertz (69) presented resolution – Evans Due Process Resolution J6 Defendants – **Exhibit L**
  1. Motion by Kristen Plaisance (37) to amend strike the word “granted” replace it with “guaranteed”
  2. 2<sup>nd</sup> by Mark Pruitt (84)
  3. Donna McAleer (61) amend the resolution to add Dan Patrick
  4. 2<sup>nd</sup> by Scott Robbins (33)
  5. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  6. Motion passes by unanimous voice vote with amendments.
- d. DJ Fike (102) presented A Call for a Vote of No Confidence on County Chair, Bryan Christ Resolution – **Exhibit M**
  - i. Due to technical issues with the room display monitor, a discussion took place on the best way to present the resolution since copies were not available. After thoughts of discussion from various CEC members, the officers were able to find



an alternative monitor to display the resolution. Time has allowed for all present CEC members to view the resolution. Jon Bouche (Vice Chairman) also read the resolution to the present CEC members.

- ii. POI by Kenneth Earnest (6) – will there be a special election for the County Chairman? The response was the CEC can elect the County Chairman.
- iii. Motion by DJ Fike (102) to approve the resolution.
- iv. Discussion called by Jon Bouche (Vice Chairman)
- v. Motion by George Hyde (100), this resolution needs to be tabled and reviewed in more detail
- vi. 2<sup>nd</sup> by Scott Robbins (33)
- vii. Discussion called for by Jon Bouche (Vice Chairman) for tabling the vote on the resolution
  - 1. Scott Robbins (33) spoke in favor
  - 2. DJ Fike (102) spoke against
  - 3. Kirsten Plaisance (37) spoke in favor
  - 4. Neda Henery (108) spoke against
  - 5. Scott Robbins (33) withdrew his 2<sup>nd</sup>
  - 6. Susan Carranza (49) provided a new 2<sup>nd</sup>.
  - 7. John Wertz (69) spoke against
- viii. Jon Bouche (Vice Chairman) called for standing vote.
- ix. Motion to table this resolution was voted down by standing vote.
- x. 2<sup>nd</sup> by Neda Henery (108) to approve the resolution
- xi. Jon Bouche (Vice Chairman) called for voice vote.
- xii. Motion passes by majority voice vote
- e. Motion by Robert Walker (87) to have the Steering Committee to investigate the Precinct Chairs attendance and to give proper notice in accordance with the Bylaws. This information will be shared in the next CEC meeting.
  - i. POI by Mark Fusca (47) on notice to all PC's
  - ii. 2<sup>nd</sup> by Scott Robbins (33)
  - iii. Jon Bouche (Vice Chairman) called for discussion. No discussion.
  - iv. Motion passes by majority voice vote. Mark Fusca (47) opposes
- f. J6 Prayer Event
  - i. Jon Bouche (Vice Chairman) recognizes Phil Cady to provide an update on the event
  - ii. Prayer rally to be held on Saturday, January 7, 2023, from 2:00 – 4:00 p.m. at the Lonestar Convention Center in Conroe – Bluebonnet Room
  - iii. The party will have a table at the event per DJ Fike (102). Volunteers are needed man the table.
  - iv. Neda Henery (108) asked that Precinct Chairs consider volunteering at the event or contribute monetary donations to Phil Cady.
- g. Motion by Robert Walker (87) to have Maureen Ball draft a letter to send to the RPT to make [mctxgop.org](http://mctxgop.org) as the official site.
- h. 2<sup>nd</sup> by Suzanne Rapattoni (99)
- i. Jon Bouche (Vice Chairman) called for discussion. No discussion.
- j. Motion passes by unanimous voice vote.

12. Adjourn at completion of Agenda

- a. Motion by Kent Frappier (2)
- b. 2<sup>nd</sup> by Mark Fusca (47)
- c. Jon Bouche (Vice Chairman) called for discussion. No discussion.
- d. Motion passes by unanimous voice vote.
- e. Meeting adjourned at 9:11 p.m.

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Vote	Notes	Y= Yes N = No 0 = No Vote A= Abstain
1	Barbara Ray	n			
2	Kent Frappier	y			
3	Alex Chandel	n			
4	Nelson Reyes	y			
5	Doug Taylor	n			
6	Kenneth Earnest	y		Joined at 7:30 p.m.	
7	Rapunzel Myers	n			
8	Bill Kercheval	n			
9	Quentin Smith	n			
10	<b>Vacant</b>				
11	Marliese Stripling	n			
12	James Metts Jr.	n			
13	Laurie Clifton	n			
14	Danielle Walters	n			
15	Gary D. Reynolds	n			
16	Greg Long	n			
17	Dale Fessenden	y			
18	Becky Vance	n			
19	Juanita G. Simmons	n			
20	Susan Johnson	n			
21	Alan A. Moore	n			
22	Anna Greathouse	n			
23	Scott Baker	n			
24	James Byers	n			
25	Wendy Lynch	n			
26	Caleb Smith	y			
27	Dale Inman	y			
28	Ken Walling	n			
29	Linda Stuckey	n			

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Vote	Notes	Y= Yes N = No 0 = No Vote A= Abstain
30	Matt Michell	n			
31	Betty Anderson	y			
32	Thomas L. Gardner	n			
33	Scott Robbins	y			
34	Ken Allen	n			
35	Tammy Kelter	y			
36	Paul Crowson	y			
37	Kristen Plaisance	y			
38	Jeff Filbin	n			
39	<b>Vacant - Lauren Vickers</b>	y		sworn in	
40	Josh Graff	n			
41	Wayne Long	n			
42	<b>Vacant - Bill Philibert</b>	y		sworn in	
43	Charlotte Belin	n			
44	John Schluter	n			
45	Kat Rummell	n			
46	Yvonne Wunsche	n			
47	Mark Fusca	y			
48	Steve Lawrence	y			
49	Susan Carranza	y			
50	Christina Lightfoot	y			
51	Victoria Tompkins	n			
52	Wayne Pearson	y			
53	Chris Crawford	n			
54	Bobby Bodenhamer	n			
55	Sandra Mobley	n			
56	Jim Doyle	y			
57	Terri Saxton	n			
58	Lana Hazlett	n			

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Vote	Notes	Y= Yes N = No 0 = No Vote A= Abstain
59	Allison Winter	n			
60	Judi Thomas	n			
61	Donna McAleer	y			
62	Jennfier Bowling	y			
63	Herschel Williams	y			
64	Roy Jimenez	n			
65	Dale Bible	n			
66	Adrian Kaiser	n			
67	Kathryn Ross	y			
68	Theresa Haag	y			
69	John Wertz	y			
70	Jack Munich	n			
71	Catherine Locetta	n			
72	Gwen Withrow	y			
73	Ronnie Trojanowski	n			
74	Ginger Russell	y			
75	Larry Rogers	y			
76	Dennis Tibbs	y			
77	Robert Coats	n			
78	Keith Wagner	n			
79	Thomas Lancaster	y			
80	Steven Foster	y			
81	Susan Scruggs	y			
82	<b>Vacant - Blake Hall</b>	y		sworn in	
83	Patricia Carr	y			
84	Mark Pruitt	y			
85	Torrey Bingham	n			
86	Glenn Speight	n			
87	Robert Walker	y			

PCT	CHAIR	Roll Call Yes = Present No = Not Present	Vote	Notes	Y= Yes N = No 0 = No Vote A= Abstain
88	Frederick Sunderman	y			
89	Melinda Olinde	y			
90	<b>Vacant- Tanya Martinez</b>	y		sworn in	
91	Annette Kerr	n			
92	Mara Wasar	y			
93	Denise Ebert	n			
94	Mary Lewis	y			
95	Sherry Tavel	y			
96	Raquel Lewis	n			
97	Kimberly Weber	y			
98	Stephanie Cox	y			
99	Suzanne Rapattoni	y			
100	George Hyde	y			
101	Stephanie Schwantes	n			
102	DJ Fike	y			
103	Thomas Bartley	n			
104	Diane Campbell	n			
105	Charlie Parada	n			
106	Wesley Doolittle	n			
107	Jackie Williams	y			
108	Neda Henery	y			
109	Mike Medved	n			
110	Luis Pedraza	y			
111	Partick Teich	y			
	Yes	51	0		
	No	59	0		
	Abstain		0		

Montgomery County Republican Party of Texas

January 3, 2023 CEC

Meeting

**Resolution: A Call for a Vote of No Confidence on County Chair, Bryan Christ**

Whereas, Chairman Bryan Christ is elected by the Republican voters of Montgomery County to represent the county party in a fair and impartial manner

AND

Whereas, the county chair is elected as the presiding officer of the County Executive Committee,

AND

Whereas, Chairman Bryan Christ has caused and created division, acrimony, and irreparable harm to the Montgomery County Republican Party name by effectively dividing the party into two entities, by

1. June 21, 2022, failing to report the elected Precinct Chairs to the Secretary of State as required by law TEC 172.118 and the MCRPTX Bylaws (Bylaws).
2. July 19, 2022, improperly adjourning the statutorily required Organizational Meeting (OM) in violation of RONR 21:3.2 and 21:12.
3. July 21, 2022, allowing two special meeting calls to be issued for the same date, place, and time but with differing agendas, violating RONR 8:2.1.
4. July 23, 2022, Chairman refused to accept the will of the majority to Chair the meeting that was called to complete the OM meeting agenda as adopted on July 19, 2022; then Chairman Christ abandoned the Chair leading to him being removed as Chair in accordance with RONR 62:9-10 but continued disrupt the meeting until security was called.
5. July 23, 2022, Chairman improperly calls a meeting with an electronic voting option in violation of our Bylaws which do not allow "electronic" CEC meetings.
6. July 23, 2022, Chairman calls dual meetings at the same place, at the same time and in the same location in violation of RONR 8:2.1 for the purpose of disrupting an "in person" meeting which was properly called in accordance with RPT Rule 8(e).

7. July 23, 2022, In accordance with the rules governing an OM, the July 19th agenda was completed by the elected precinct chairs present; Officers, Steering Committee and other key Committee members were elected which Mr. Christ, to this day, refuses to acknowledge.
8. July 25, 2022, the Chairman attempted to hold an improperly noticed "electronic" meeting without publishing the required information and when questioned about the procedures to be in accordance with RONR 90:30-36, he did not respond until July 31 and did so with inadequate information to allow an electronic meeting.
9. July 30, 2022, Precinct Chair Dennis Tibbs petitions for a CEC meeting to be held on August 13, 2022 with more than the required number of petitioners(27).
10. July 30, 2022, Precinct Chair James Byers petitions for a CEC meeting to be held on August 13, 2022 for the same date and time but with a different agenda. However, this meeting call does not meet the required number of petitioners (19 of 20 required per the Bylaws); it affects everything deriving from that meeting thereafter.
11. July 30, 2022, again Mr. Christ sends out dueling meeting calls that continue to divide the party.
12. August 13, 2022, the improperly called CEC meeting by Mr. Byers proceeded to elect steering committee members and conduct "business" all of which is invalid, but Mr. Christ refuses to acknowledge such and continues to recognize those elected as "official" members of the steering committee of the CEC. All meetings/actions thereafter from that meeting are ruled as null and void by the CEC..
13. September 6, 2022, the CEC convened and agreed to be under the 2020-2022 bylaws in an effort to unify the party. All officers, committee chairs and precinct chairs were, once again, elected by the majority of the body, in accordance with the agreed upon bylaws and a petition was then signed by sixty- four (64) members of the CEC to attest to this. Chairman Christ still refused to recognize these officers, committee chairs and Precinct Chairs and continued to recruit people to fill vacancies that didn't exist in defiance of the majority of the party and then falsified the Precinct Chair record on file with the Secretary of State.
14. September 30, 2022 - Chairman Christ attends mediation after being compelled to do so by the State Party in accordance with RPT Rule 8m. During mediation, Chairman Christ admits that he does not have the majority of the CEC supporting him. Then, despite agreeing to confidentiality, following mediation Chairman Christ sends out an email to the CEC in which he gives false information regarding the mediation discussions and results. This causes further division in the party.



15. December 6, 2022, the CEC held a Special Meeting as called in accordance with our bylaws (Article VI, Sec. 2) and by Precinct Chairs elected in the Primary, since Chairman Christ was not protesting the legitimacy of those people. With a quorum present and more than a majority voting (57 CEC Members), after the meeting was called to order, the party objected to Chairman Christ's statement that Mark Frank (Pct 10) was the duly elected Secretary as well as Chairman Christ's refusal to acknowledge and accept the CEC objections against his call to be "at ease". The CEC then voted unanimously that Christ had abandoned the chair for not acknowledging and accepting the objections to his call to be "at ease" and his statement that Mark Frank (Pct 10) was the duly elected Secretary. Because Chairman Christ would not chair the meeting in accordance with Robert's Rules and party bylaws and move the business forward, he was removed from the chair. (RONR 62:10). Christ then continued to claim that the meeting was "at ease" so no business was done despite the vote of fifty-seven (57) members of the CEC who voted unanimously to the contrary.

Chairman Christ's actions are causing great harm to the Republican Party of Montgomery County and the State of Texas as he continues to divide and create acrimony between the CEC members by knowingly spreading false information and turning the party membership against itself. Therefore, due to Mr. Christ's total disregard for the will of the body as expressed time and time again by a majority vote of the County Executive Committee and in consideration of Chairman Christ's refusal to acknowledge properly called meetings and the results derived from those meetings, the County Executive Committee must take action.

#### THEREFORE, LET IT BE RESOLVED

That the CEC members call for a VOTE OF NO CONFIDENCE in Chairman Bryan Christ on this day, **January 3, 2023**.

#### LET IT ALSO BE RESOLVED

That the CEC members call for the immediate resignation of Chairman Bryan Christ for the good of the Republican Party of Montgomery County and the State of Texas.

#### LET IT FURTHER BE RESOLVED

That a copy of this VOTE OF NO CONFIDENCE be referred to the Republican Party Of Texas and that the Montgomery County Republican Party demands that the State Executive Committee take action in accordance with TEC 171.029(c) and declares that Chairman Christ has abandoned the Chair.



Staci Earnest - Secretary

Passed 1/3/23 by voice vote with 2 dissenting votes.

## 01/03/2023 - Vice Chairman's Report –Jon Bouche

Despite my constant communications and efforts to ensure compliance with state laws, party rules, our 2020 Bylaws and Robert's Rules of Order, and to maintain order within the party, Chairman Christ has recruited several people to fill vacancies that did not exist and he has even continued to claim that the duly elected officers as listed on the party's official website [www.mctxgop.org](http://www.mctxgop.org) are not legitimate.

To address this situation directly and in the proper way, on December 6, 2022 a Special Meeting of the Montgomery County Republican Party County Executive Committee was held to resolve several issues. Two key issues were addressed at this Special meeting.

1. Chairmen Christ's continued public pronouncements regarding the legitimacy of the elected officers.
2. Chairman Christ's continued the public pronouncements regarding the legitimacy of the Precinct Chairs appointed by the County Executive Committee(CEC).

With a quorum present of 57 members, the CEC voted unanimously to disavow Chairman Christ's claims regarding both of these issues and confirm that the following officers were elected by the CEC and are to be considered the legitimate officers and Committee Chairs of record for the party.

### **Officers:**

Vice Chairman – Jon Bouche  
Secretary – Staci Earnest  
Treasurer – Charles Shirley

### **Steering Committee:**

George Hyde

Quentin Smith  
 Kenneth Earnest  
 Robert Walker  
 D.J. Fike

**Vacancy Chair:**

Allison Winter

**Victory Chair:**

John Wertz

Also, with a quorum of 57 members present, the CEC voted unanimously to disavow Chairman Christ's claims regarding the legitimacy of the Precinct Chairs listed below and the CEC confirmed for the record that the following Precinct Chairs were properly appointed by a majority of the CEC and are to be considered the legitimate Precinct Chairs of record for the party. And that these names should be reported to the Secretary of State within 48 hour of the adjournment of the meeting on December 6, 2022.

<b><u>Pct #</u></b>	<b><u>Precinct Chair Name</u></b>
26	Caleb Smith
54	Bobbi Bodenhammer
56	Jim Doyle
62	Jennifer Bowling

72	Gwen Withrow
80	Steven Foster
92	Mara Wasar
94	Mary Lewis
95	Sherry Tavel
98	Stephanie Cox
101	Stephanie Schwantes
103	Thomas Bartley
104	Diane Campbell
107	Jackie Williams
111	Patrick Teich

As of today, January 3, 2023, Chairman Christ has not complied and reported the names of these Precinct Chairs to the Secretary of State.

The Chairman's tactic of recruiting unsuspecting or in some cases unscrupulous people to disrupt, frustrate and confuse the business of this party is unacceptable and will no longer be tolerated.

If there is something on the agenda or a disagreement about a ruling or rule that any member of this body wishes to protest or debate, this should be done within the party rules and under Robert's Rules of Order (RONR) so that we may function as civil society. Once the issues is debated and the vote is taken, that should be the end of the matter. The Chairman's continued approach of ignoring voting results he doesn't like and his hiring a lawyer because he is unable to win the vote should be condemned by every member of this body.

**Vacancy Committee Report to CEC**  
**Special Meeting**  
January 3, 2023

The Vacancy committee met on December 20th. A quorum was present.

We conducted interviews for 4 open precincts. The Vacancy Committee voted to recommend the following people for appointment to their respective precincts.

**Pct 39- Lauren Vickers**

**Pct 42- Bill Philibert**

**Pct 82- Blake Hall**

**Pct 90- Tanya Martinez**

From: Allison Winter  
Vacancy Chair 2022-2024

From: "Ann Kate"  
To: "Bryan Christ", "Raquel Lewis", "[Aywinter@gmail.com](mailto:Aywinter@gmail.com)"  
Cc: "Gwen Withrow"  
Sent: Tuesday June 7 2022 11:07:12AM  
Subject: Precinct chair resignation

## **Exhibit 5-38**

Please accept my resignation as Precinct 72 chairman. After 8 years as chairman I feel it is time for me to let someone else be in charge of my wonderful, heavily Republican, precinct. I hope to become involved in something other than politics, but will continue to support the Republican Party in other ways.

I would like to recommend Gwen Withrow to replace me as chairman of precinct 72. Gwen and her husband recently moved to Bentwater, in Precinct 72, but she has been active in Republican politics for many years and in many capacities. She is currently the SD4 SREC representative.

Good luck to the CEC in the coming two years. I hope some real work will get done for the Party.

Ann Kate  
Pct. 72 Chairman



## Montgomery County Republican Party

### County Executive Committee Meeting Minutes

1201 Lake Woodlands Dr., Suite 4020, The Woodlands, TX

July 23, 9:00a.m

**Stated Purpose:** Reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment.

Called by: Robert Walker, and the Precinct Chairs listed in the Notice - **Exhibit A**

1. Call to Order
2. Invocation
3. Pledges
4. Roll Call
5. Approval of Agenda
6. Oath of Office
7. Treasurer's Report
8. Adoption of Bylaws (Freedom Caucus) - Roll Call Vote
9. Elections of Officers (including other members of the Steering Committee, as well as Vacancy & Victory Committee Chairs) - Secret Ballot
10. New Business - Discussion of Appointees  
(Pct. 72, 92, 94, 98, 103 & 104)
11. Adjourn at the completion of this agenda.

At approximately 8:55 a.m, GOP County Chairman Bryan Christ addressed those in attendance and stated that he wanted to talk with everyone about how the day was going to go though he did not call the meeting to order.

Chairman Christ stated that he had been consulting with an attorney and that he would be following the guidance given to him. He said, "There is no precedence for the situation we find ourselves in. None what-so-ever". The Chairman then stated that the guidance he received



from this attorney was for the body to conduct an out-of-session, unofficial vote on which agenda would be used for the meeting that was scheduled to start at 9:00 a.m..

The two agendas that the Chairman then presented for consideration were the agendas presented by Robert Walker(87) and an alternate agenda presented by James Byers(24).

The agenda presented by Mr. Walker was submitted within the required 2 day notification period for Emergency Meetings and it was the same agenda from the Organizational Meeting on July 19, 2022 which had not been completed before the meeting was adjourned to recess for that night. Mr Byer's agenda was sent out at 4:46 p.m. the same day which several people immediately objected to because it did not give the required 2 day notice per MCRPTX Bylaws Article VI, Section 2. In response to those objections, Chairman Christ reiterates that the group is not in session but asked for what amounted to be a straw poll vote to choose between those agendas.

Mr. Walker then called the Chairman "Out of Order" for his attempt to have an unofficial straw poll to replace Mr. Walker's agenda with Mr. Byers agenda that was clearly "Out of Order". The Chairman replied that since the body was not in session he would not consider "Points of Order". Mr. Walker asked the Chair which agenda he was there to follow because he had called this meeting in accordance with MCRPTX Bylaws Article IV, Section 2 and not Mr. Byers and that his meeting call was timely and in order while Mr. Byers' meeting call was not. Despite the protestations of Mr. Walker and several others in attendance including Dale Inman (27 and SREC), the Chairman continues to insist that there be an out of session vote to decide which agenda would be followed. Mr. Walker continues to ask if the Chairman is going to preside over his agenda or not and asks for a "Yes or No" response. Chairman Christ responds that he isn't going to answer Mr. Walker's(87) question in the way that he had requests and once again calls for an unofficial straw poll. Mr. Walker(87) states that since it is 9:00 a.m., it is time for the meeting to start and again asks if the chairman is going to call the meeting to order and chair the meeting as called for by Mr. Walker(87). Mr. Christ continues to insist on an unofficial, out of session straw poll so Mr. Walker(87) tells the Chairman that the meeting is being called to order and that since the Chairman is not going to chair it, then he should leave.

The meeting is called to order at 9:00 a.m. and the chairman refuses to participate as the chair but continues to disrupt the meeting by speaking loudly over the microphone while Mr. Walker is addressing the body. The Chairman is joined in the disruption by Glenn Speight(86) and Mr. Byers(24). Neda Henery(108) calls for a Point of Order since the Chairman is refusing to chair the meeting but will not leave. Mr. Walker once again asks the Chairman to leave and calls for the Sgt. at Arms to ask the chair to leave. Chairman responds, "We aren't in session" and this was refuted by several including Neda Henery(108), Treasurer John Wertz(69) and Kim Weber(97).

Mr. Walker(Pct 87) asks once again if the chair is going to lead the meeting called by Walker and if not, for the chair to leave so we could proceed with business. At appx. 9:05am John Wertz(69) tells Mr. Walker(87) that we need to move along with the meeting so the Chairman is

again asked to leave by Mr. Walker (87), if he's not going to fulfill his duties as presiding officer. Linda Stuckey(29) then approaches the front without being recognized and addresses the group in support of the Chairman.

Allison Winter (59) reads from Robert's Rules of Order citing (RONR 8:2.1) which states that you can't call more than one meeting for the same time and place. The Chairman responds by saying that since the meeting is not called to order, no "Points of Order" will be considered.

Though the meeting is called to order and Mr. Walker (87) is moving forward, Chairman Christ continues to speak out and is called "Out of Order" again by numerous CEC Precinct Chairs. Chairman Christ tells Mr. Walker(87) to be quiet while insisting that the body is not in session. John Wertz(69, Party Treasurer), declares that it is past time to call the meeting to order and to get going on the agenda. The Chairman continues to talk and continues to be ruled "Out of Order" by the CEC Precinct chairs. At this time, former Vice Chairman Jon Bouche turned off all of the microphones except the one that Mr. Walker (87) is using it so that the business of the meeting could be conducted without further interruptions from competing microphones.

Mr. Walker(87) asks the Sergeant Arms (Calvin Russell) to remove the Chair. Prior to this, John Wertz(69) made a point of order, appealing to the Chair a third time, seconded by Neda Henery(108). Mr. Wertz declares the Rules are Suspended (RONR 62:12), seconded by many and asks for the mic, so business can proceed. Discussion ensues between Chairman Christ, Mr. Walker(87), Calvin Russell(Sergeant of Arms), with Dale Bible(65) observing. Mr. Walker (87) declares that three appeals to (and of) the chair have been made and that, as a consequence, the rules have been suspended, as per RONR 62:12 (But a simple use of RONR 62:10 removes the chair's authority).

Mr. Wertz(69) calls mall security.

Mr. Walker(87) read RONR governing the meeting. The Chairman was appealed to 3 times to chair the official meeting. He refused each time.

The Chairman was using his position as Chair to make rulings which were appealed numerous times to which he would respond "we are not in session".

Mr. Wertz(69) stated to the body that the body consisting of 40 precinct chairs had called the meeting and that Mr. Walker(87) who had called the meeting was the representative at this time since the Chairman Christ refused to call the meeting to order and Chair the meeting. Per Robert's Rules of order, Mr Walker or another member of the body would have to nominate someone to chair that meeting and that person would have to be elected by a majority of those present and voting to chair the meeting.

Mr. Walker reiterated that the session once again wss in order as he Chairman's followers continued to disrupt by yelling loudly. Several attempts to quell the continued discussions, including Former Vice Chair Jon Bouche and Party Chaplain Billy Graff.

**Execution of the Agenda(approved on 7/19/22)**

Mr. Walker(87) had called the meeting to order at 9:05 a.m. The chairman's few supporters continued to shout from the back of the room. Jon Bouche asks everyone to calm down. He explains that the meeting is called to order based on the first agenda that was sent. The agenda was approved on July 19, 2022.

**Invocation**

Billy Graff took the mic as the Chaplin of MCRPTX. Mr. Graff provides the Invocation.

Gary Reynolds(15) asks the body to run with Robert Walker's agenda with Bryan Christ being the chair. He was called out of order since the chair had already refused to serve and had been removed.

**Pledges**

Led by John Wertz

PoO by Ms. Henery(108)that we're not online; Mr. Wertz(69) asks to amend. Mr. Wertz(69) reads that a 7/22 (7:08pm) email sent by Mr. Walker(87) to the chairman about an online meeting. In it, it indicated that the online meeting component doesn't follow RONR (9:36), MCRPTX bylaws(Art. XVI) nor even RPT (8J) rule(as Mr. Walker(87) called the meeting, not the chairman. Furthermore, Mr. Walker's(87) approved agenda did not state that there was an online meeting. Therefore, the online format is not valid.

PoO by Raquel Lewis(96) said emergency sessions do allow online meetings.

Mr. Walker(87) indicates that credentials and the login information must be provided in the meeting notice. That information was not provided and was not in Mr. Walker's(87) call to a meeting with the majority of precinct chairs. This meeting was approved by the chairman(noted above) and he was offered to preside over this meeting. The Chairman had refused to call the meeting to order on time and repeatedly refused to chair the meeting as called by Mr. Walker (87).

RPT rules 9B (quorum rules) is read by Allison Winter(59) - Statutory meeting requirements are for those members present.

PoO by Charlie Prada(105) questions whether or not adjournment was called at the previous meeting and is called out of order by Mr. Walker(87), who explains that Mr. Sundermans(88) premature and out of order adjournment(on 7/19; a fixed time was set for meeting to end only when agenda was complete) was conditional until the parties could come back together and work things out to complete the business according to the approved agenda (on 7/19).

Multiple interruptions continue. Mr. Wertz(69) calls for Order of the Day to continue roll call.

**Roll Call**

- Temporary Secretary, Staci Earnest, takes roll call.
- After some delays, Mr. Wertz(69) calls for order of the day to continue with the roll call.
- Roll call is completed. Some disparity in numbers, as some on the Zoom call were answering present, when they weren't
- Allison Winter calls for a standing roll call
- Robert Walker repeatedly asks for the disruptive Zoom phone to be shut off and everyone to remain quiet. Precinct 22 Chair Anna Greathouse closes Chairman Christ's laptop which was making noise because the speakers were left on and the volume was up. That did not quiet the laptop so Former Vice Chair Jon Bouche looked at it but it was screen locked so he did not mess with it and just asked that the Zoom feed be muted entirely by Precinct 3 Chair Alex Chandel who was facilitating the Zoom feed.
- Quorum is established, 51 present in the room **Exhibit B**

#### **Nominations for Temporary Chairman**

- Nominations for Temp Chairman are heard
- Dale Inman(27, SREC SD-4) is nominated by Mr. Wertz(69)
- Adrian Kaiser(66) is nominated by Linda Stuckey(29)
- POI by Raquel(96) to restate candidate names
- POI by Allison Winter(59) asks the candidates to step out of the room.
- The nominees decided to leave the room
- Standing count of vote is taken
- Dale Inman is elected by vote of Dale Inman - 32, Adrian Kaiser - 6

Chairman Christ returns to the room and interrupts the meeting, stating he is leaving. He is called "Out of Order" again by Mr. Walker.(87) At this time several additional CEC members leave the meeting.

#### **Oath of Office**

- Dale Inman(27), Temp Chairman, calls for the Precinct Chairs to be sworn in by Gwen Withrow, SREC Chairwoman.
- All precinct chairs sworn in

#### **Treasurer's Report**

- Dale Inman (Temp Chairman, 27 & SREC) calls for the Treasurer to read the final treasurer's report of the last biennium by John Wertz, Treasurer, dated July 19, 2022 for the month ending June 30, 2022.
- Account balance at that time, which was filed July 13, 2022 with the Texas Ethics Commission, was 54,401.09. Approximately \$326 income; almost \$700 in expenses were either pending/outstanding. Balance now appx. just over \$54K. **Exhibit C**
- POI by DJ Fike(102), states this is an emergency meeting for completing the Organization meeting, therefore, the statutory report states that a quorum are those members present.
- After Mr. Wertz finishes his Treasurer report, he then asks to be recognized/granted and makes a motion to adopt the Freedom Caucus Bylaws. **See Exhibit D**

- Second is made.
- John Wertz notes that slight changes were made to those distributed 7/12 & 7/19 (as a courtesy) and highlighted in yellow on pages 1(Art. III, Sect. 1, 4); Art. VI, Sect 6 p. 9; and Art. VII Sect. II, p10.
- Allison Winter asks for a recess and a second is made at 10:13 a.m.

Dale Inman (27, Temp Chairman) called the meeting back to order at 10:21 am

#### **Adoption of ByLaws**

- Dale Inman (27, Temp Chairman) calls to continue the vote on the Bylaws and reminds the CEC body that a motion and a second was provided prior to the recess
- Roll Call vote is taken on the bylaws presented by the Freedom Caucus members.
- By a vote of 37 Yay's and 0 Nays the Bylaws pass **Exhibit B**

George Hyde(100) motions to suspend rules, removing agenda required roll call vote and move to voice vote. The body passes the motion and the Bylaws.

#### **Election of Officers**

- Dale Inman (27, Temp Chairman) asks for nominations for **Vice Chairman**
- Mr. Wertz(69) nominates Jon Bouche
- Jon Bouche accepts
- Any other nominations repeated 3 times
- By point of acclamation of the body, Jon Bouche is elected Vice Chair.

POI by DJ Fike are we operating under the new bylaws? The Temp Chairman responded yes.

- Dale Inman(27, Temp Chairman) asked for nominations for **Secretary**
- Adrian Kaiser(66) nominates Staci Earnest for Secretary
- Any other nominations repeated 3 times
- No other nominations
- By point of acclamation of the body, Staci Earnest is elected
- Dale Inman(27, Temp Chairman) asked for nominations for **Treasurer**
- Mr. Wertz(69) nominates Charlie Shirley
- Any other nominations repeated 3 times
- No other nominations
- By point of acclamation of the body, Charlie Shirley is elected

#### **Election for County Steering Committee**

- Position 1 Robert Walker(87) is nominated by Kim Weber(97)
- Dale Fessenden(17) nominates Quentin Smith(9)
- POI by Robert Walker(87) to clarify the nominations are for position 1

- Upon hearing response, Dale Fessenden(17) withdrew nomination of Quentin Smith(9)
- POI by Neda Henery(108) refers to Article 5 Section C of new Bylaws - nominate all 5 positions at once and vote via secret ballot, if there are more than 5 nominees.
- Dale Inman (Temp Chairman) agreed.
- Nominations continue
- Robert Walker(87) is nominated by Kim Weber(97) and Robert Walker accepts
- Quentin Smith(9) is nominated by Dale Fessenden(9) and Quentin Smith accepts
- DJ Fike(102) is nominated by Neda Henery(108) and DJ Fike accepts
- Kenneth Earnest(6) is nominated by DJ Fike(102) and Kenneth Earnest accepts
- George Hyde(100) is nominated by John Schluter(44) and George Hyde accepts
- Any other nominations repeated 3 times
- No other nominations
- With only 5 nominees for the 5 positions, motion to vote via point of acclamation made by Doug Taylor(5), Dale Fessenden(17) provides second.
- Voice vote was all Yay's.
- The 5 are elected to the County Steering Committee
  - Robert Walker
  - Quentin Smith
  - DJ Fike
  - Kenneth Earnest
  - George Hyde

**Election of Vacancy Committee Chair**

- Dale Inman(Temp Chairman) asked for nominations for Vacancy Committee Chair
- Theresa Haag(68) nominates Allison Winter(59)
- Second is provided
- Ms.Winter(59) accepts the nomination
- Any other nominations repeated 3 times
- By point of acclamation of the body, Ms. Winter(59) is elected

**Election of Victory Committee Chair**

- Dale Inman(Temp Chairman) asked for nominations for Victory Chairman
- Mr. Wertz (69)is nominated by Kenneth Earnest(6) and second by Ms. Weber(97).
- Any other nominations repeated 3 times.
- By majority voice vote of the body, Mr. Wertz(69) is elected.

**New Business**

- Ms. Winter(59) passed out PCT chair information - **Exhibit E.**
- Ms. Winter(59) reads an email dated June 7th (2022) from PCT Chair Ann Kate (72). Ms. Kate resigned via email sent to secretary Raquel Lewis(96), Chairman Christ and Ms. Winter(59) with a cc to Gwen Withrow(SREC). In the email, Ms. Kate(72) suggested Gwen Withrow(SREC SD-4) as her replacement (for the new biennium). Ms. Winter(59) said that chairman Christ incorrectly indicated that he could not accept her

resignation because it was for the last biennium and not the new one, though she indicated it was for both. RONR 32:8 states that when a PCT chair resigns, it is immediate (unless specified for some other time, which it wasn't).

**Vacancy report**

- Ms. Winter(59) presents the Vacancy Committee report
- There are currently 13 vacancies: 26, 54, 62, 72, 80, 92, 94, 98, 101, 103, 104, 107, 111

POI by Mr. Walker(87) that the Prct chairs listing on the website and google sheet do not match. Temp Chairman, Dale Inman said that is a clerical error and will be corrected.

POI - Mr. Earnest(6) - on nomination of PCT chairs. The CEC needs to make a recommendation to the vacancy chair and the body will need to vote. As stated in Article III, Section 4-Membership of new Bylaws.

- Ms. Winter(59) clarifies that we are considering the 5 that did serve in the last biennium, plus Ms. Withthrow(SREC SD4).
  - Gwen Withrow - PCT 72
  - Stephanie Cox - PCT 98
  - Mara Wasar - PCT 92
  - Mary Lewis - PCT 94
  - Thomas Bartley - PCT 103
  - Diane Campbell - PCT 104
- Mr.Wertz(69) makes a motion to vote by point of acclamation
- Ms. Weber(97) provides a second
- Voice vote is taken
- Passes by majority
- Ms. Winter(59) provides the Oath of office to Ms. Withrow(72) and Ms. Cox(98).
- Allison Winter indicates there are now 7 new vacancies after new PCT chairs elected as noted above. Those 7 vacancies are: 26, 54, 62, 80, 101, 107, 111

POI by John Wertz(69) to recognize Calvin Russell(Sargent of Arms), Charles Shirley(Parliamentarian) and Staci Earnest(Secretary).

**Adjourn**

- Ginger Russell(74) motions to adjourn
- Scott Robbins(33) provides a second
- Mr. Inman(Temp Chairman) clarifies all business is completed in accordance with the agenda
- Mr. Inman(Temp Chairman) called the meeting adjourned at 10:57 a.m.

**DECLARATION FOR AUTHENTICATION OF BUSINESS RECORDS**

My name is Matthew Patrick, my date of birth is [REDACTED], and my address is [REDACTED]. I declare under penalty of perjury that the following statements are within my personal knowledge and true and correct.

1. I make this declaration as a member of the State Republican Executive Committee and my role as a mediator in the dispute between factions of the Montgomery County Republican Executive Committee revolving around the appointment of precinct chairs.
2. I am the custodian of my records concerning this dispute, which includes a summary memorandum attached to this declaration.
3. As the custodian of these records, I am familiar with the manner in which they are created and maintained by virtue of my duties and responsibilities as a custodian of my records.
4. Attached are three (3) pages of records, which are exact duplicates of the original memorandum that was circulated with the Officials Committee.
5. The records were made at or near the time of each act or event set forth in the record, which I created for the Officials Committee.
6. The memo was kept by me, as a person with knowledge of the dispute, as stated in the memo.
7. The memo was kept in the course of regularly conducted business activity.
8. It is my regular practice to make and keep a record of my political activities.
9. Though this memo was originally created for confidential use of the Officials Committee, I have become aware that it has been leaked and now available. I am providing this copy to ensure that any discussion of this memo is based on an accurate version with its full context.

Executed in Dallas County, State of Texas, on February 9, 2023.



Matthew Patrick, Declarant



# Confidential

November 18, 2022

To: RPT Officials Committee (Not for Distribution)

From: Matthew Patrick, SD-16

Re: Montgomery County Mediation

The purpose of this memorandum is to provide a summary to the Officials Committee of the events of September 30, 2022 when Chairman Rinaldi and I conducted a mediation for the Montgomery County Republican Party pursuant to Section 8m of the Rules of the Republican Party of Texas. It is not an assessment or a judgement of the validity or the invalidity of the positions, complaints, or facts set out by either side; rather it is my assessment of the events of that day and the conduct of the individuals involved.

As you all know, the parties did not resolve their differences and no agreement was reached. That is unfortunate, and leaves the split in the MOCO CEC essentially unchanged.

The two sides were represented by the following individuals:

Chairman Bryan Christ; James Bryers; Linda Stucky and Raquel Lewis. This side had a bit of a surprise to all involved by having legal counsel attending via zoom—Eric Opiela. Of note, Mr. Christ attempted to avoid the meeting and disclaim involvement in the dispute, attending only at the insistence of the Chair. He also began the meeting in the same vein by claiming that he ‘only followed the direction of the CEC and the rules.’ In this memo I will refer to this group as ‘the Christ group’.

The other group was represented by Jon Bouche; Allison Winter; John Wertz and Robert Walker. In this memo I will refer to this group as ‘the precinct chair group’.

Given the history of acrimony and tendency to devolve into ‘he said/she said’ recounts of past details the mediation was conducted by placing each group in separate rooms, with the Chair and I going back and forth, sometimes together and sometimes not. We made a point of pushing each group out of their comfort zone in an effort to move both sides toward an agreement. The meeting was scheduled to last 4 hours, but lasted about 5 ½.

The notable events were:

- Both sides agreed that Chairman Christ was the duly elected Chair of the County Party. Both sides agreed that the list of chairs elected in the primary was correct and represented all duly elected precinct chairs at that point in time (with 1 dispute from the precinct chair group).
- Both sides acknowledge that the precinct chair group has the majority of the members of the above referenced precinct chair list. This point is particularly important, since it impacts so much of what has been happening since -- the calling of competing meetings, whether those meetings have quorum, and whether any decisions at those meetings are valid (including subsequent appointments of new precinct chairs).
- While each side rehashed its grievances, the precinct chair group was more inclined to make concessions and more desirous of bringing the County party back together. The Christ group was more combative and unyielding, and only paid lip-service on 1 occasion to a desire to heal the rift. Ms. Stuckey & Lewis rarely provided comments, although they did participate in sidebar conversations.
- Mr. Byers seems to be a significant source of the problems. At one point, when confronted by the Chair on his misreading of the bylaws, he proclaimed that they were poorly written. Within 2 minutes of that, he was thundering at me that he *authored* the bylaws himself. When I reminded him that he had only moments before condemned the bylaws as poorly written and that if he authored them then he was the source of the problems

stemming therefrom—is that true & what he wanted to maintain?-- he responded with a simple “Yes, it is true”.

- Mr. Byers also concocted an excuse worthy of a Democrat when he attempted to explain that the Christ group’s violation of the bylaws by calling zoom CEC meetings was because some elderly precinct chairs were ‘afraid’ to attend in-person meetings. The Christ group did not respond to the idea of having sergeant-at-arms or additional security at the meetings.
- The precinct groups’ primary goal was to have a single meeting with all precinct chairs present. They repeatedly expressed willingness to just follow the bylaws, or make concessions if necessary to have a 3<sup>rd</sup> party led ‘organizational’ meeting to bring the sides together.
- After hours of prodding, we seemed to have achieved some agreement from the Christ group on minor concessions, although Mr. Christ was unyielding on the 1 thing I believed was most necessary to bring the 2 sides together (the chairing of a redone ‘organizational’ meeting by a neutral 3<sup>rd</sup> party.) Chairman Rinaldi asked the Christ group to write out a ‘best offer’ list of terms. Shockingly when this was produced not only were NONE of the things we had agreed to verbally included, but they returned to their original proposal and **added new conditions that had never been brought up.**
- I strongly admonished Mr. Christ & Mr. Byers about the dueling meetings, noting that their continued calling of such meetings would provide the basis for additional possible actions by the SREC.

Ultimately, the rift is, in my assessment, a result of a complete failure of leadership by Chair Christ. CEC’s across the state frequently have factions and/or disputes, and it is the Chair’s **job** to find a path through those disputes that works for both sides. Mr. Christ has not only failed in this principal duty, but seemed entirely uninterested in solving the problem. On questioning, he offered no solutions nor explanations of how things have gotten this far under his tenure. It will be unfortunate for the precinct chairs and for the Republican voters of Montgomery County if he continues in this vein, but ultimately it will be up to the voters of the county to replace him in the next cycle, barring further action before then.

Respectfully submitted,

Matthew Patrick, SD-16

**In the Supreme Court of Texas,  
Austin, Texas**

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**In Re:**

**The MoCo Precinct Chair Group, et al.,  
Relators.**

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**Petition for Writ of Mandamus  
Appendix III**

III. Declarations of Relators

Exhibit 7. Kenneth Allen (Pct 34, elected)  
Exhibit 8. Betty Anderson (Pct 31, elected)  
Exhibit 9. Thomas Bartley (Pct 103, 7/23/22)  
Exhibit 10. Daniel Bingham (Pct 85, elected)  
Exhibit 11. Patricia Carr (Pct 83, elected)  
Exhibit 12. Susan Carranza (Pct 49, elected)  
Exhibit 13. Stephanie Cox (Pct 98, 7/23/22)  
Exhibit 14. Paul Crowson (Pct 36, elected)  
Exhibit 15. James (Jim) Doyle (Pct 56, 10/4/22)  
Exhibit 16. Kenneth Earnest (Pct 6, elected)  
Exhibit 17. Dale Fessenden (Pct 17, elected)  
Exhibit 18. Doris “DJ” Fike (Pct 102, elected)  
Exhibit 19. Steven Foster (Pct 80, 8/13/22)  
Exhibit 20. Kent Frappier (Pct 2, elected)  
Exhibit 21. Josh Graff (Pct 40, elected)  
Exhibit 22. Theresa Haag (Pct 68, elected)  
Exhibit 23. Blake Hall (Pct 82, 1/3/2023)  
Exhibit 24. Neda Henery (Pct 108, elected)

NOTE: Counsel has all of these declarations available, but to avoid repetitive evidence and minimize file size, this filing includes only the following exhibits included:

8 Betty Anderson  
16 Kenneth Earnest  
17 Dale Fessenden  
25 Dale Inman  
38 Kristen Plaisance  
50 Fred Suderman  
53 Patrick Teich  
54 Dennis Tibbs  
63 Allison Winter  
64 Gwen Withrow  
65 Jon Bouché  
66 Staci Earnest  
67 Charles Shirley

Opposing counsel will be provided all exhibits.

Exhibit 25. Dale Inman (Pct 27, elected)  
Exhibit 26. Tammy Kelter (Pct 35, elected)  
Exhibit 27. Tom Lancaster (Pct 79, elected)  
Exhibit 28. Steven Lawrence (Pct 48, elected)  
Exhibit 29. Mary Lewis (Pct 94 7/23/2022)  
Exhibit 30. Christina Lightfoot (Pct 50, elected)  
Exhibit 31. Catherine Locetta (Pct 71, elected)  
Exhibit 32. Tanya Martinez (Pct 90, 1/3/2023)  
Exhibit 33. Donna McAleer (Pct 61, elected)  
Exhibit 34. Melinda Olinde (Pct 89, elected)  
Exhibit 35. Wayne Pearson (Pct 52, elected)  
Exhibit 36. Luis Pedraza (Pct 110, elected)  
Exhibit 37. Bill Philibert (Pct 42, 1/3/2023)  
Exhibit 38. Kristen Plaisance (Pct 37, elected)  
Exhibit 39. Suzanne Rapattoni (Pct 99, elected)  
Exhibit 40. Nelson Reyes (Pct 4, elected)  
Exhibit 41. Scott Robbins (Pct 33, elected)  
Exhibit 42. Larry Rogers (Pct 75, elected)  
Exhibit 43. Kathy Ross (Pct 67, elected)  
Exhibit 44. Ginger Russell (Pct 74, elected)  
Exhibit 45. John Schluter (Pct 44, elected)  
Exhibit 46. Stephanie Schwantes (Pct 101, 8/13/22)  
Exhibit 47. Susan Scruggs (Pct 81, elected)  
Exhibit 48. Juanita Simmons (Pct 19, elected)  
Exhibit 49. Caleb Smith (Pct 26, 8/13/22)  
Exhibit 50. Fred Sudermann (Pct. 88, elected)  
Exhibit 51. Sherry Tavel (Pct 95, 8/13/22)  
Exhibit 52. Doug Taylor (Pct 5, elected)  
Exhibit 53. Patrick Teich (Pct 111, 8/13/22)  
Exhibit 54. Dennis Tibbs (Pct 76, elected)  
Exhibit 55. Ronnie Trojanowski (Pct 73, elected)  
Exhibit 56. Lauren Vickers (Pct 39, 1/3/2023)  
Exhibit 57. Robert Walker (Pct 87, elected)  
Exhibit 58. Mara Wasar (Pct 92, 7/23/22)  
Exhibit 59. Kim Weber (Pct 97, elected)  
Exhibit 60. John Wertz (Pct 69, elected)  
Exhibit 61. Herschel Williams (Pct 63, elected)  
Exhibit 62. Jackie Williams (Pct 107, 8/13/22)  
Exhibit 63. Allison Winter (Pct 59, elected)  
Exhibit 64. Gwen Withrow (Pct 72, 7/23/22)  
Exhibit 65. Jon Bouche (Vice Chair, 7/23/2022)  
Exhibit 66. Staci Earnest (Secretary, 7/23/2022)  
Exhibit 67. Charles Shirley (Treasurer, 7/23/2022)

### **DECLARATION OF BETTY ANDERSON**

My name is Betty Anderson; Voter Registration is under Elizabeth Anderson. My date of birth is [REDACTED] and my address is [REDACTED] 1.

**I declare under penalty of perjury that the following statements are true and correct:**

I write this declaration as the undisputed Republican elected chair of precinct 31, in support of legal action to help resolve the most recent division now going on within our local Party structure. Bryan Christ has either been negligent or willfully incompetent in chairing the Mo. Co. Executive Committee (CEC) since he's held this Party position. He has also been continually unwilling to accept the will of the Conservative Majority CEC members. I've never seen this level of what appears to be ongoing deception within our Party.

This division has impeded the CEC's orderly participation in county elections and Get-Out-The- Vote participation. I have observed that Brian Christ, the Montgomery County Republican Party Chair:

1. He has not accurately reported many properly vetted & seated precinct chairs.
2. In addition, there are too many times he has not followed our legitimately voted on MCRP Rules & Bylaws for this Biennium.
3. To add to the division, Bryan's wife, Kristin Nichole Christ, has been a political consultant for over 10 years, paid by Republican candidates running for election or re-election against other Republicans in GOP Primaries. She now benefits financially even more from Bryan's position as County Chair and many Republican Party resources. She has also recruited some Republicans to run against other Republican Precinct Chairs. This has been a family business which is clearly divisive & a conflict of interest.

### **Examples of Chairman Christ's Inaccurate Reporting to the Secretary of State (SOS):**

I served on the MCRP Vacancy Committee as Vice Chair from 2018 - 2022. I also served as a member of this committee in several previous years or attended the meetings as an observer. Under Committee Chairman Allison Winter's leadership since 2018, the Vacancy Committee has spent countless hours searching, vetting & reporting our findings to each CEC meeting for approval,

---**Violations of TEC 172.029:** Bryan Christ never removed the names of two former precinct chairs who officially resigned their positions.

- Martha (Ann) Kate from Pct. 72 resigned June 7, 2022.
- Srini Katta from Pct. 56 resigned August 20, 2022.

Their names continued to be registered on the SOS website, long after it was time to remove them, in violation of TEC 172.029.

---**Violations of TEC 172.118:** Bryan Christ committed fraud by not reporting to the SOS fifteen people whom he knew had officially been appointed to Precinct Chair positions at three separate Montgomery Co. Executive Committee meetings which I attended & voted to approve these appointments. Their names are still NOT registered on the SOS website.

**\*Appointed July 23, 2022, but not reported:** Gwen Withrow - Pct 72, Mara Wasar - Pct. 92, Mary Lewis - Pct. 94, Stephanie Cox - Pct. 98, Thomas Bartley - Pct 103, Diane Campbell - Pct 104. I attended this meeting & voted to approve these appointments.

**\*Appointed August 13, 2022, but not reported:** Caleb Smith - Pct. 26, Bobbi Bodenhamer - Pct 54, Jennifer Bowling - Pct 62, Steven Foster - Pct 80, Sherry Tavel - Pct 95, Stephanie Schwantes - Pct 101, Jackie Williams - Pct 107, Patrick Teich - Pct 111. I attended this meeting & voted to approve these appointments.

**\*Appointed October 4, 2022, but not reported:** James Doyle - Pct. 56. I attended this meeting & voted to approve these appointments.

**---Violations of TEC 171:024 and Texas Penal Code, Section 37:10:** Bryan Christ committed fraud by reporting names of four people to Precinct Chair positions that he knew had already been filled. Martha (Ann) Kate - Pct. 72, Destiny Stark - Pct 92, Kenneth Ditto - Pct 103, John Thomas - Pct. 26.

The conservative majority of the CEC, led by Vice Chair Jon Bouche (due to Chairman Bryan Christ's absence), had proper percentage of chairs to call each of these meetings, sufficient quorums to elect officers & appoint precinct chairs. The establishment minority of the CEC, led by James Byers, disagreed over the 2022 Bylaws at the July 19 Organizational Meeting so the Majority CEC compromised later & agreed to operate under the 2020 Bylaws. Everything the Majority CEC did was in accordance to both sets of Bylaws.

Bryan Christ's Minority CEC has claimed to fill precinct chair vacancies through a vacancy committee, supposedly established at their illegitimate 8/13/22 meeting, chaired by Becky Vance and 20 or so supporting precinct chairs approving each candidate, which is not the required 1/3 quorum nor close to a majority of the CEC; so all of their appointments are invalid.

Having been a member of the legitimate Majority Vacancy Committee the past few years, I'm a witness to the tireless work of Committee Chair Allison Winter (the last two bienniums) and our other committee members recruiting & vetting candidates by researching voting records, social media posts, reviewing their applications & then interviewing them in order to recommend the most qualified, conservative & committed Republican candidates to these important posts. By not recognizing our approved chairs, but replacing them with their own favored establishment candidates, Chairman Bryan Christ is undermining our legitimate, hard working Vacancy Committee & wasting our time and theirs. We have detailed, transparent minutes & votes. On the other hand, the Minority "Vacancy Committee" has not been transparent & detailed in their vetting of candidates. From what I can tell, it seems like their only qualification to be a Precinct Chair is total support of the Chairman controlling the CEC instead of fairly chairing the CEC meeting according to the rules & Bylaws.

### **Examples of Chairman Bryan Christ's Unwillingness to follow our legitimate MCRP Rules & Bylaws for this Biennium**

**7-14-22 Private Collusion Email from James Byers to Bryan Christ (MCRP Chair), & Jason Millsaps (parliamentarian.)** This is a damning email exposing the ulterior plans of James Byers to take control of the Organizational Meeting for the 2022 - 2024 Biennium. Byers mentions that he would be prepping a volunteer on Sat. July 16 to help him with his scheme.

**7-19-22, 6:30 pm I attended this Organizational Meeting at M.C. Commissioners Courtroom -**

James Byers proceeded with his pre-planned agenda to totally take over the meeting & thereby thwart the will of the Majority of the sitting CEC members. He started out by complaining about the title of the Amended (Freedom Caucus) Agenda. They knew after our first vote (47-31) that they didn't have even close to a majority, so their only weapon was to stall & object. There was so much time wasted with ridiculous Points of Order by Byers & his egregious plans to thwart the important work of the Majority going forward. —Finally, around 10 pm, Pct. Chair Fred Sunderman made some statement that he had to get back to his TXDOT work that night, so he impulsively called for an early adjournment before the agenda was completed. Chairman Christ should have called the Motion to Adjourn out of order, since the adopted agenda required that all business be completed before adjournment, in violation of RONR 21:3.2 and 21:12. Now we would have to reconvene on another day to finish our important Organizational Meeting.

**7-23-22, 9 am - I attended this Emergency CEC Meeting at TWFG community room - called by Robert Walker on Sat. July 21, 8:55 am**

The stated emergency meeting call was that we must reconvene to complete the continuation of business of the approved agenda from the 2022 Organizational Meeting on Tues., July 19 which was not completed due to improper adjournment. This was a properly called continuation of the 7-19 Organizational Meeting. We had sufficient percentage of chairs to call the meeting, more than a sufficient quorum to elect officers & appoint precinct chairs. In fact, we agreed to operate under the 2020 Bylaws as a show of compromise to the minority. Everything we did was in accordance with both 2020 & 2022 adopted Bylaws.

Chairman Christ showed up and proceeded, minutes before the meeting was to convene (9:00 am), to attempt a vote on which agenda from 7/19/22 to use. The one (aka Freedom Caucus agenda) substituted and adopted by the majority of 7/19/22 or one by James Byers. The body objected to this and both chairs Robert Walker and John Wertz objected to this attempt to hijack the meeting, after it started and eventually challenging the chair (with seconds) and removing him via Roberts Rules of Order (RONR 62:10). SREC Committeeman Dale Inman was then elected to temporarily run the meeting until officers could be appointed.

James Byers continued to interrupt the meeting with Points of Order. They were clearly refusing to recognize the will of the majority of members in attendance. Finally, James Byers bloviated a statement & left the room. Not long after that Chairman left the room too, abandoning the chair. After that, business was conducted smoothly according to rules & Bylaws.

**7-25-22, 6:30 pm I attended this CEC ZOOM meeting - called by Becky Vance on July 20 (24 pct chairs, excluding Ann Kate who had officially resigned on June 7)**

The stated "emergency" was that there could be a threat of disorderly conduct "which has many in the group concerned for their safety." [First of all, what is the purpose of a Sergeant at Arms? Secondly, ZOOM is a great way to control who gets recognized to speak & make motions. It also does not provide the clear transparency of actual votes taken. People on either side can be called to get online if extra votes are needed & we noticed that going on. Roll call votes by ZOOM are also very time- consuming.]

I went to MCRP headquarters to join the ZOOM meeting, making sure I would have a good internet connection to my laptop. I witnessed how confusing the ZOOM meeting was and how



much time was wasted. Raquel Lewis initially recognized the chairs appointed on 7/23/22 then stated later in the call that those chairs weren't recognized. [And this date was my 75th birthday. It was worth the sacrifice to me to represent the conservative majority, but the lack of being able to accomplish our business was disgusting and a complete waste of everyone's time!]

**Chairman Christ sent out dual meeting announcements for the same time, different locations on 8/13/22 which continued to divide the party. Dennis Tibbs called the meeting at 8:52 am on July 30 by email to all PCs. James Byers's call was only announced by Chairman Christ at 9:47 pm that night. Chairman Christ attended the illegitimate CEC meeting.**

**8-13-22, 9:00 am I attended this CEC meeting at TWFG community room - called by Dennis Tibbs at 8:52 am on July 30 (28 pct chairs).** We had proper percentage of chairs to call the meeting, sufficient quorum to appoint pct. chairs, which we did. The body also removed Chairman Christ from the CEC bank account and appointed Jon Bouche (Vice Chair), Charles Shirley (Treasurer) and John Wertz (Asst. Treasurer) as signatories on the CEC bank account.  
**8-13-22, 9:00 am CEC meeting at Lone Star Comm. Cntr. - called by James Byers at 9:47 pm on July 30 (19 pct chairs of 97 eligible, which was not 20% the required by the MCRP Bylaws Art. VI, Sect 2.** They needed 20 PCs, so this meeting was invalid, but it was nevertheless the one that Chairman Christ attended & "officiated.")

**8-31-22, 6:30 pm I attended this Emergency CEC ZOOM meeting - called by Susan Johnson**  
 Agenda: discussion to pay headquarters lease, because an autopayment was not issued from our bank to the lessor. [\*\*Why didn't Bryan Christ just pick up his phone & call Treasurer Charles Shirley?] **What a waste of our time when Precinct Chairs are preparing for the GOTV efforts in the Nov. General Election.**

**9/6/22 - Chairman Christ on 8/23/22 calls dual CEC meetings again. This is clearly divisive! Chairman Christ attended the illegitimate meeting at Lone Star Comm. Center**

**9-6-22, 6:30 pm I attended this CEC meeting at TWFG community room - Meeting called by our Steering Committee which established meeting schedules on 8/13/22 (Art V Sect 4; Art VI Sect 2). We had a sufficient quorum to elect officers & appoint pct. chairs. Chairman Bryan Christ was not present, so Vice Chair Jon Bouche chaired the meeting in Christ's absence. Much business was conducted & Committee Reports were presented. 14 new Precinct Chairs were seated, whereby all 111 Republican Precincts were now filled at that time. Push cards were being processed by John Wertz's Victory Committee, and walk lists were being processed by Robert Walker as we were moving closer to the Nov. 2022 General Election. Significantly, we had voted to operate under the 2020 Bylaws as a show of compromise to the minority. Everything we did was in accordance with both 2020 & 2022 Bylaws.**

**9-6-22, 6:30 pm CEC meeting at Lone Star Community Center - called by James Byers. (Of my count from the video, it appears only 10 precinct chairs attended) \***  
 \*According to Article VI, Section 2 of the CEC's Bylaws, special meetings must have 20 % of the total CEC (excluding vacancies) who are supporting that call. Ten Precinct Chairs was far below the required number needed. --What a waste of time & energy!

Meanwhile, I was spending WEEKS printing & assembling voter info & block walking packets for over 1100 Republican homes in my precinct, representing an average of 2-3 voters / home. I have volunteers who help me deliver this info before early voting begins.

I also spent a couple more weeks helping to line up over 100 Republicans who responded to my email request to help clerk for precincts on Election Day, we didn't want to have to call upon Democrats to help run these elections at 111 election sites.

**All of this division is very distracting from the actual work we grassroots Republicans are trying to accomplish!**

**10-4-22, 6:30 pm - I attended this properly called meeting at TWFG community room - Chairman Bryan Christ was not present, so Vice Chair Jon Bouche chaired the meeting in Christ's absence.** Business was conducted & Committee Reports were presented. Precinct Chairs were able to pick up 20,000 GOTV push cards to deliver to their 2R voters before the General election. None of Chairman's Christ 30%+ side was there, leaving nearly 7,000-8,000 cards uncollected by them.

**11-1-22, 6:30 pm - I attended this short meeting at Herrera's Mexican Restaurant - Chairman Bryan Christ was not present, so Vice Chair Jon Bouche chaired the meeting in Bryan's absence.** Precinct Chairs were able to pick up more push card (those not picked up by Chairman Christ people) to deliver to their voters before the General election.

**12-5-22, 8:30 pm** at Shout House, Conroe - CEC meeting (after the 12-6-22 meeting below had already been called.) – This was called by Bryan Christ's steering committee. I did not attend this meeting. =Waste of time.

**12-6-22, 6:30 pm - I attended this Special CEC at TWFG community room - Called by:** Robert Walker & 23 additional PCs. Stated Purpose: "Unity Meeting" seeking to resolve the issues dealing with appointed dual Precinct Chairs and dual elected officers of the Montgomery County Republican Party. The Chairman arrived, attempted to run the meeting by appointing Mark Frank as Secretary, to which the body objected vociferously and said Staci Earnest was our chair. We challenged him three times (with seconds) to run the meeting according to Walker's agenda, he refused, and he was removed from his presiding officer position for the evening. (RONR 62:10). He continued disruptions throughout the meeting, calling the meeting at ease, when it was not. Once we adjourned the meeting, precinct chair John Wertz, responsible for the meeting space, had to call security to have Christ, Byers, Mark Frank and their attorney Eric Opiela escorted out of the meeting space.

During the meeting, we discussed disciplinary action up to and including censure of Chairman Bryan Christ for any or all of the above-mentioned violations/issues from the beginning of this document.

**12-6-22 - Immediately following the Special CEC meeting** scheduled by the legitimate Steering Committee – **I also attended this short CEC meeting at TWFG community room. Business was conducted without hassles. Neither Bryan Christ nor James Byers were present.**

1-3-23, 6:30 pm - I attended this meeting - at TWFG community room - Business was conducted without hassles. . Neither Bryan Christ nor James Byers were present.

To magnify the Party division, on January 17, **Chairman Christ** emailed a message titled, **“What's Going on in the Montgomery County Republican Party?”** to the vast number of Republican contacts in the Party's email database. It's full of lies & disinformation but towards the end, he has a very clever, left-wing censorship recommendation for Republicans who receive the new M.C. Republican Party Reporter” newsletter.

**Bryan's Quote:** "HOW YOU CAN HELP. In the meantime, if you receive their “Montgomery County Republican Party Reporter” or any email that points to a website other than mcrptx.org, please forward it to [abuse@constantcontact.com](mailto:abuse@constantcontact.com). Be sure to point out that you never subscribed to their Newsletter or Alerts and that you don't appreciate Constant Contact sending you a fraudulent 'Newsletter'." <https://mailchi.mp/4809d6550370/whats-going-on-in-the-montgomery-county-republican-party?e=618e2ca9c4>

The egregious censorship statement above is an attempt by Chairman Christ to silence the Majority of our CEC, which approved creation and distribution of the new newsletter on October 4th, 2022, lead by Communications Committee chair Lisa Railey.

This is similar to what has been going on with communication on other local social media platforms like Facebook & NextDoor for years now.

**Examples of how Chairman Bryan Christ & wife Kristin Nichole Christ's family business is clearly compounding the division & is a conflict of interest for their financial gain.**

Using the word REPUBLICAN explicitly in the name of a voter's guide, which endorses one Republican over another Republican in a Primary Election, is a DIVISIVE issue which can easily deceive voters.

During the Republican Primary Election in 2020, the REPUBLICAN Voters of TX PAC (RVT) endorsed opponents that they ran against me & 30 other sitting Republican precinct chairs. They also endorsed some of Kristin Christ's clients including her husband Bryan, the former of whom were running for re-election. The RVT was not an organization officially recognized by our M.C.R.P. & they never had regular meetings. If Kristin had been a volunteer, an unpaid Campaign Manager, this wouldn't be nearly so divisive, but Kristin is the Republican Party Chairman's wife, benefitting financially from the use of Party resources & deceptive campaign techniques, recruiting & running “Republicans” against other Republicans.

My opponent in the 2020 Primary was Ritzy Fletcher. She had several people passing out RVT voter guides at early voting & our election day location. One temp worker told us they were being paid \$15 / hour. They were wearing red Republican t-shirts & asking voters if they wanted the “REPUBLICAN” Voter Guide, to which many replied,

**“OH YES, I want the Republican guide!”**

**On the other hand, Montgomery Co. Tea Party's unpaid volunteers** (actual organization with 2 monthly meetings year-round) were also in the parking lot passing out voter guides which had a different slate of **Republicans** listed, **including me**. The RVT endorsements were almost totally opposite the Tea Party slate.

Some of the voters were surprised & angry that they had almost been snookered by the **“Republican Voters of TX.”** Most voters absolutely do not know the difference between the RVT & MCRP.

More on the Riley/Christ deception, courtesy of Reagan Reed on the RVT.

<https://texasscorecard.com/local/fake-republican-pac-created-to-deceive-voters/>

Note: Voters were first deceived in 2014 by a "fake tea party" (the TX Conservative Tea Party PAC) which got Charlie Riley (commissioner) & Craig Doyle (county judge) elected. And when they were exposed, they changed the name to Republican Voters of TX PAC.

Bryan was elected as MCRP chairman in 2020 by deceiving voters. I've attended almost every CEC for past 25 years & I never saw Bryan at a CEC meeting before he ran for Chairman. He was elected to preside over an organization he had never even attended previously! The voters had no idea what was really going on.

**Deception IS divisive - and we need to expose it & take a strong stand against it.**

Before the 2020 Republican Primary, Ritzzy **Fletcher** (President of RVT PAC at the time), **Kristin Nichole Christ**, Bryan's wife (Charlie Riley's PAID consultant & campaign manager), & **Linda Stuckey** (Charlie Riley's campaign treasurer) were leading the charge that has actually been the cause of more divisive rifts in Party. Their goal was to take out the PCs who hadn't supported Riley in the Primary & take out the conservative majority in the CEC. <https://texasscorecard.com/local/commissioner-charlie-riley-threatens-republican-precinct-chairs/>

Here's the video of County Commissioner Charlie Riley announcing the threats against the Precinct Chairs who didn't support his candidacy. [https://youtu.be/nSknd\\_hBOuY](https://youtu.be/nSknd_hBOuY)

Many of the top donors to this RVT PAC, according to their February 2020 campaign financial report, were either Commissioner Charlie Riley, former commissioner James Metts & their contractors or other candidates who want to get elected & endorsed by the PAC. Some were Kristin Christ's clients, like Riley, Robert Walker & James Metts who paid a lot to help fund their campaign materials. And this list is similar to the previous "fake tea party" of 2014 & 2016, "TX Conservative Tea Party Coalition." Similar donors/supporters & similar style of deceiving the voters – it's just a new name.

Meanwhile, Kristin Nichole Christ's political consulting company is Southern Heritage Consulting, LLC. Ethics Commission campaign finance reports show her candidates paying her firm & funding the RVT Voter Guide - a pay-for-play scheme.

The Primary Election recruiting & campaigning for candidates to run against other Republican candidates by Kristin & Bryan is an ongoing example of how Chairman Bryan Christ's family business is compounding the division & is a conflict of interest. They have been using Republican Party resources to promote one Republican candidate over another during Primary elections for financial gain. This needs to end if Chairman Christ is actually serious about unifying the Party.

**I'm very supportive of grassroots conservative leadership within our Republican Party structure, not top-down control.** Bryan Christ's divisive approach towards chairing the Montgomery Co. Republican Party resulted in a 123-page **RPT Rule 8m complaint** signed by a majority of the CEC (including me) in September 2022, along with a **Vote of No Confidence**. A short summary of the complaints is attached, faithfully copied below:



### 8m Summary to RPT, Thursday, September 22, 2022

On August 15, an RPT Rule 8m petition was filed against Montgomery County Republican Party(MCRP) Chairman Bryan Christ by a majority of 52 precinct chairs through our SD - 4 representatives, Committeeman Dale Inman and Committeewoman Gwen Withrow. On Thursday, September 1st, the RPT requested MCRP Vice Chairman Jon Bouche provide this one page synopsis of the 123 page complaint.

In summary, the detailed 8m complaint lays out the many willful and egregious steps Chairman Christ has made to divide and take away control of our party from the CEC, as follows:

- In a total lack of respect for the CEC, Pct. Chair 24 James Byers Collusion email to the chairman and his parliamentarian to coordinate hijacking of the July 19th Organization Meeting (accomplished) and thwarted the will of the majority during the meeting;
- His abrupt/unqualified/improperly adjourned 7/19/22 meeting by misstating the adjournment made by Mr. Sunderman (88), which should've been repeated for clarity to the body. As well, he should have called the motion to adjourn out-of-order due to the adopted agenda, which specified that all business must be completed prior to adjournment(RONR 21:3). Additionally, he ignored all calls for division as he hurried to adjourn. (violating RONR 21:12);
- Refusal to chair the reconvened 7/23/22 Organization meeting ([TEC 171.022](#)) - subsequently removed him via RONR 62:10;
- Statutory required failure to report multiple (16) precinct chairs to Secretary of State from the 5/24/22 election, as well as 13 others that were seated thereafter on 7/23/22 and 8/13/22 ([TEC 172.118](#)), potentially hindering our November GOTV effort;
- Statutory required failure to report resigned precinct chair(72 - Ann Kate) and allowing her to participate in voting and counting her in calls for special meetings;
- Purposely scheduling dual meetings 3 times, on top of already properly noticed meetings, at same date & time, assuring conflict, confusion & division (especially amongst new chairs), dividing everyone's loyalties, time and effort (RONR 8:2.1);
- Improperly noticed online meetings by his precinct chairs(should be the chairman). Neither proper credentials nor instructions were included (7/25/22 & 9/1/22) and meetings were rigged to control the outcome in disallowing open participation by muting everyone's mic, nor providing properly required transparent business protocol or simultaneous documentation during zoom meeting (RPT Rule 8j and RONR 9:36). Also on 7/25 he refused to accept some motions. In addition, he kept members in the waiting room(8/31), not allowing participation in the zoom meeting. His failure to send to the CEC the meeting minutes and post to the website in accordance with bylaws has caused confusion by not having the record of the business that occurred and to be taken up at (future) meetings. The new technology chair needs to be involved in this process. In addition, any and all party contact lists must be made available to Secretary Staci Earnest;
- He's prevented conservative leadership access to HQ and to the website, stifling GOTV;
- The CEC has since removed him from the bank account(primarily for GOTV). Has also been negligent in providing (20) receipts for bank withdrawals, despite repeated requests.

We, the duly elected CEC, do request that the RPT censure County Chairman Bryan Christ as appropriate, up to and including removal from office to prevent further division, chaos and embarrassment within the party. Our SREC Rep Dale Inman(SD-4) has asked Mr. Christ to resign. We feel it is in the best interest of MCRPTX to unite the party which would require the RPT to acknowledge the 2022-24 bylaws and elected officers, steering committee, and precinct chairs.

Respectfully,

Robert L. Walker (Pct. 87 Chair) - Elected Steering Committee (SC) Member  
 John Wertz(Pct. 69 Chair) - Assistant Treasurer; former elected Treasurer(2018-2022)  
 Allison Winter (Pct. 59 Chair) - Elected Vacancy Committee Chair(former elected SC Member)

**I also testify to the following about myself:**

- Pct 31 GOP Chairman (2006 - 2023)
- President of Montgomery County (Mo.Co.) Eagle Forum since 2008 (Paid memberships & monthly meetings.)
- Former chairman of Mo.Co. Christian Coalition (1998 - 2008)
- Married to Dave Anderson, ThM, PhD 55 yrs.

I moved to Montgomery County in 1972 after my husband Dave finished his ThM degree. He founded & pastored several thriving churches & 3 prominent Christian schools in Montgomery Co.

I have also attended in person almost every legitimately called Montgomery County Republican Party Executive Committee ("CEC") meeting for over 25 years, first as a concerned citizen, then as Chairman of Mo.Co. Christian Coalition, and now, as President of Mo.Co. Eagle Forum.

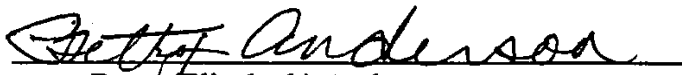
I have voted in every Republican Primary & attended or chaired every Precinct Caucus since 1992. I was elected to the position of Mo. Co. Republican Precinct 31 Chair during the 2006 Republican Primary & have served dutifully ever since then. In fact, I was soundly re-elected when Ritzy Fletcher contested my position in March 2020. (She had been recruited & supported by Chairman Bryan Christ's wife Kristin Nichole Christ & her "Republican Voters of TX PAC.")

I preface all this background because over the past 3 decades that I've been actively involved, I've not only met a lot of conservative activists & voters, but I've also witnessed ongoing division within the Mo. Co. GOP through the years, including MCRP control by Wally Wilkerson, the previous Chairman for over 55 yrs. It was like having a king vs. "We the People." The CEC was establishment, big tent Republicans, supported by contractors, developers, lobbyists, and even Democrat crossovers vs. grassroots, pro-Republican Party Platform conservatives. During those years, the grassroots conservative precinct chairs (including me) were in the minority. Even though we didn't always have the votes to get what we wanted to achieve, we agreed that we would speak up, yet allow the majority of the CEC have its way without major hassles.

Almost 20 yrs. ago, I was attending the first CEC meeting after a heated Primary Election and I listened to MCRP Chairman Wally Wilkerson advise the Executive Committee to be "neutral on divisive issues, in order to have unity within the Party." After the meeting I told him that the only reason I'm involved in the Party is precisely BECAUSE of the divisive issues. I refuse to be neutral to simply keep peace. I told him I believe our unity should be based on the conservative issues we Republicans believe in, especially, Republican Platform Priorities – not based on being neutral!

Montgomery County is not unique. There's been much division within other counties, states & even the national GOP organizations as well. This is not something new.

Executed in Montgomery County, State of Texas on February 9, 2023,

signed:   
printed name: Betty (Elizabeth) Anderson



**DECLARATION OF KENNETH EARNEST**

My name is Kenneth Earnest; my date of birth is [REDACTED] and my address is [REDACTED]  
[REDACTED] I declare under penalty of perjury that the following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary.
2. I have been personally present at events concerning a division of the Montgomery County Republican Party Executive Committee ("CEC"), and write this declaration in support of legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC's orderly participation in county elections, as I am aware that Brian Christ, the elected Montgomery County Republican Party Chair, is not accurately recognizing properly seated chairs, is exhibiting bias in favor of the minority faction of the CEC during meetings or derelict in his responsibilities in the management of the CEC's resources, such as the space leased by the Montgomery County Republican party and its website.
3. I hold the position of Republican Precinct Chair 6 in Montgomery County, having obtained that seat as indicated below by the checked paragraph:  
  
☒ ELECTED AND NOT DISPUTED - I was elected to the office of Precinct Chair during the 2022 Republican Primary and to my knowledge, no one contests my election or position as a duly elected Precinct Chair and member of the CEC.
4. After reviewing a copy of the list of precinct chairs given by Bryan Christ to the Texas Secretary of State, I learned that Christ has refused to recognize Gwen Withrow's appointment on July 23, 2022, which followed the written resignation of Martha Ann Kate, her predecessor. I am aware that Christ's failure to list Withrow properly is a violation of his ministerial duties described at section 172.118 of the Texas Election Code.
5. I have also seen a call for a specially called meeting on or about August 13, 2022, issued by Christ. According to section 2 of the CEC's Bylaws, special meetings must have a list of precinct chairs who are supporting that call which equals 20% of the total membership (not including vacancies). Christ is using Martha Ann Kate on his list of supporting precinct chairs when he called that meeting.
6. I have been a long-time activist in the Republican Party and I am aware that dueling sets of precinct chairmen will cause difficulties as the election draws near. Additionally, precinct chair lists are public information (see section 172.029(b) of the Texas Election Code). I am aware that candidates depend on these lists.



7. Additionally, precinct conventions are historically run by precinct chairs or their agents and allies. If this matter is not resolved, we may well have competing claims and disputes about which precinct convention held for a precinct is valid.
8. Chairman Christ never called any meeting on July 23<sup>rd</sup>, though he stated that he had two good meeting calls, one submitted by his ally, Byers, and the other by Walker, which was a continuation of the Organizational Meeting of July 19<sup>th</sup>. Christ stated that he wanted to vote on which agenda he would use by voting on them before calling the meeting to order. Though the chairs were assembled, and the 9 a.m. start time came and went, the chairman refused to reconvene the 7/19/22 Organization Meeting. The body subsequently called the meeting to order, removed Christ pursuant to RONR 62:10 and continued with the meeting.
9. Christ has failed to report the 13 chairs who were appointed on 7/23/22 and 8/13/22, potentially hindering our November GOTV effort.
10. Christ is also improperly deciding unilaterally to allow online participation by determining that some unnamed emergency necessitates online voting, even when the call of the meeting does not include such. Neither proper credentials nor instructions were included (7/25/22 & 9/1/22).
11. Even when Christ held his online meeting, his meetings were rigged to control the outcome in disallowing open participation by muting everyone's mic, and providing properly required transparent business protocol or simultaneous documentation during zoom meeting (RPT Rule 8j and RONR 9:36). Also, on 7/25 he refused to accept some motions. In addition, he kept members in the waiting room on 8/31, not allowing participation in the zoom meeting. Then he failed to post the minutes on the CEC's website in accordance with bylaws, causing further confusion by not having the record of the business that occurred and to be taken up at future meetings.
12. Aside from the challenges of disputed precinct chair lists, Christ is refusing to allow access to CEC resources and meeting space and claiming to fill precinct chair vacancies through a committee of his 30+ supporting precinct chairs, which is not close to a majority of the CEC; all these appointments appear to be invalid to me.
13. As I have watched the division in the CEC, it appears that about one-third of the precinct chairs support Christ, and two-thirds are opposed to his leadership actions. The result of his lack of leadership and support means that none of his meetings can appoint a person to a vacant precinct chair, as such votes require a one-third quorum of the CEC. His divisive approach resulted in a RPT Rule M complaint signed by a majority of the CEC on August 15, 2022, along with a vote of no confidence on January 3, 2023.

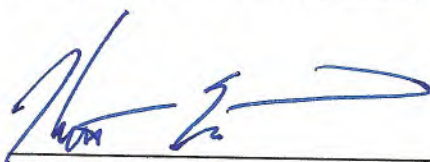


14. On January 9, 2023 I received an email from James Byers from the illegitimate "Conduct and Ethics Committee", of which he proports to be the Chairman of the Committee. I am accused of a "Level 1 violations": 1) Conspiracy to commit bank fraud; 2) Committed bank fraud with intent to embezzle; 3) Conspired to embezzle and did in fact embezzle County Executive Committee funds; 4) Missed four (4) consecutive CEC meetings. I responded to Mr. Byers by asking two questions; 1) Provide confirmation that Chairman Christ is aware and endorses your investigation, and 2) Provide documentation that you have the authority you are claiming. Mr. Byers response to Chairman Christ knowing was non-responsive and he indicated this was within his authority. On the second point Mr. Byers said the committee was created at the illegitimate August 16, 2022 meeting and he was illegitimately elected at the September 6, 2022. Based on a review of the September 6, 2022, meeting minutes, it appears that after all other committees are assigned, Mr. Byers nominated himself for chair of the "Conduct and Ethics Committee" and was accepted by the 30 chairs present.

15. Based on the email notice that Byers sent me, which I have attached as an exhibit to this declaration, and others that I know of, Byers is attempting misuse the abandonment rules of section 171.029 of the Texas Election Code to eliminate chairs who are not appearing at his special meetings improperly called, to reduce his opposition.

16. I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on 2/11, 2023.

  
Kenneth Earnest

From: James Byers <[mcrp.conduct.and.ethics@gmail.com](mailto:mcrp.conduct.and.ethics@gmail.com)>  
Date: January 9, 2023 at 10:51:58 PM CST  
To: Kenneth Earnest <[kenearnest@icloud.com](mailto:kenearnest@icloud.com)>  
Subject: Notice of Investigation for Violations of the MCRP Code of Conduct and Ethics

Precinct 6 Chair Kenneth Earnest,

This is your notice that the MCRP Committee on Conduct and Ethics on January 12, 2023, @6:30 PM will examine evidence of actions you have made in violation of the MCRP Code of Conduct and Ethics (attached), RPT Rules, and the Texas Election Code. You will be given an opportunity to speak in your defense, but at that time a vote will be taken only on whether to proceed with a formal investigation.

If approved, once the formal investigation has been completed. you will be given a 7 day notice of the meeting during which a final vote will be taken on these violations.

Documentation will be presented regarding the following **Level 1 violations**:

- 1) Conspiracy to commit bank fraud
  - a. On Saturday August 13, 2022, at a Freedom Caucus meeting purporting to be a Special CEC Meeting, you were presented the document "Exhibit G 2022 Bank Authorization.pdf" signed by Staci Earnest. Jon Wertz, Jon Bouche, and Charles Shirley explained and advocated use of that document to lead Sunflower bank into thinking the County Chairman had been removed as Chairman and therefore should also be removed from the MCRP bank account at Sunflower Bank without the County Chairman's knowledge or consent.
  - b. At that same meeting you voted to approve and support the plan presented by John Wertz, Jon Bouche, and Charles Shirley to defraud Sunflower Bank with the purpose of embezzling Party funds.
- 2) Committed bank fraud with intent to embezzle
  - a. On August 15, 2022, John Wertz, Jon Bouche and Charles Shirley, presented the fraudulent document "Exhibit G 2022 Bank Authorization.pdf" to Sunflower Bank, which you approved doing in accordance with the plan you supported. Because of your approval and support for the fraudulent bank authorization document and plan, Sunflower Bank removed the primary signatory County Chairman Bryan Christ from the account without the County Chairman's knowledge or consent and without Executive Committee approval, all of which you intended to happen.
- 3) Conspired to embezzle and did in fact embezzle County Executive Committee funds
  - a. When with your approval and support, fellow conspirators John Wertz, Jon Bouche, and Charles Shirley seized and took possession of the Sunflower Bank account, the reported balance was \$54,401 on August 15, 2022.
  - b. From August 15, 2022, to date, with the account balance now at \$31,134, a total of \$23,267 have been embezzled.
- 4) Missed four(4) Consecutive CEC Meetings. You were absent from the following meetings:
  - a. Special CEC 8/13/2022
  - b. Emergency CEC 8/31/2022
  - c. Special CEC 9/6/2022
  - d. Regular CEC 12/5/2022

**ZOOM MEETING INFORMATION**

Topic: Conduct and Ethics Committee Meeting, Thursday January 12, 2023, at 6:30 PM  
Time: Jan 12, 2023 06:30 PM Central Time (US and Canada)

Join Zoom Meeting

<https://us06web.zoom.us/j/88960845285?pwd=NDdJWm9ZT1ZKTzc4TTNBVVKdk5XUT09>

Meeting ID: 889 6084 5285

Passcode: 884962

One tap mobile

+13462487799,,88960845285#,,,\*884962# US (Houston)

+12532050468,,88960845285#,,,\*884962# US

Dial by your location

+1 346 248 7799 US (Houston)

+1 253 205 0468 US

+1 253 215 8782 US (Tacoma)

+1 669 444 9171 US

+1 719 359 4580 US

+1 720 707 2699 US (Denver)

+1 564 217 2000 US

+1 646 558 8656 US (New York)

+1 646 931 3860 US

+1 689 278 1000 US

+1 301 715 8592 US (Washington DC)

+1 305 224 1968 US

+1 309 205 3325 US

+1 312 626 6799 US (Chicago)

+1 360 209 5623 US

+1 386 347 5053 US

+1 507 473 4847 US

Meeting ID: 889 6084 5285

Passcode: 884962

Find your local number: <https://us06web.zoom.us/u/kvrRUNFfs>

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**Chairman James Byers, Conduct and Ethics Committee  
Montgomery County Republican Party, Texas**



**Conduct and Ethics Committee**

Montgomery County Republican Party of Texas

<https://mcrptx.org>

**DECLARATION**

(TEX. CIV. PRAC. & REM. CODE § 132.001)

My name is Dale Fessenden; my date of birth is [REDACTED] and my address is [REDACTED] I declare under penalty of perjury that the following statements are true and correct:

I am a resident of Montgomery County and voted in the 2022 Republican Primary.

I hold the position of Republican Precinct Chair 17 in Montgomery County, having obtained that seat as indicated below by the checked paragraph:

☒ ELECTED AND NOT DISPUTED - I was elected to the office of Precinct Chair during the 2022 Republican Primary and to my knowledge, no one contests my election or position as a duly elected Precinct Chair and member of the CEC.

☐ APPOINTED AND NOT DISPUTED - I was appointed to the office of Precinct Chair on \_\_\_\_\_, after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. To my knowledge, no one has challenged my position and all members of the CEC accept my appointment.

☐ APPOINTED BUT DISPUTED - I was appointed to the office of Precinct Chair on \_\_\_\_\_, after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. I am aware that Brian Christ has claimed to have appointed someone else to this position or otherwise asserts that my claim to this position is not valid.

Background:

- The Organizational Meeting (OM) of the Montgomery County Republican Party (MCRP) was held on July 19, 2022.
- The July 23, 2022 Emergency Meeting (7/23 EM) called by Robert Walker was properly noticed and distributed by the County Chairman and included the stated purpose of “*we must reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment.*”

- The January 17, 2023 “*What's Going On in the Montgomery County Republican Party?*” email was distributed by the faction of the MCRP led by County Chairman Bryan Christ with his name headlining the authority. The names of the “Freedom Caucus” (FC) leaders were named, but the Precinct Chairs were unnamed, thus all Precinct Chairs are implicated.
- ARTICLE VI, Section 6 of the Bylaws of the MONTGOMERY COUNTY REPUBLICAN PARTY OF TEXAS 2020-2022, Re-Enacted July 19, A.D. 2022 (Bylaws) states that “*The agenda for all county executive committee meetings must be approved by majority vote at the beginning of each meeting.*” The County Chairman refused to convene the July 23, 2022 Emergency Meeting (EM) until the County Executive Committee (CEC) “voted” on which agenda would be followed – the agenda of the meeting call by Robert Walker (the first call) or the agenda of the meeting call by James Byers (the second call). Both meeting calls listed the same date, time, and location.

Harms to me, as Precinct 17 Chairman, from the January 17, 2023 email:

- The County Chairman falsely alleges that “*there is a minority group of elected Precinct Chairs calling themselves the Freedom Caucus*” when the FC-affiliated “group” (FC-A) was clearly the majority attending the OM, by adopting the FC-A Majority amended agenda by a vote of 47 Yeas and 31 Nays, and in the majority at the 7/23 EM, which was opened as a reconvening of the OM. The false allegation associates me with a “group” purported to be in defiance of the will of the majority.
- The County Chairman falsely alleges that the FC-A Majority (and me by association) has “*no regard for the law and no regard for Party Rules, and they have a complete disregard for the authority and responsibility of the County Chairman.*”
- The County Chairman, regarding the July 19, 2022 OM, misconstrues the motion for adjournment as follows: “*Out of frustration, their own caucus members called for the meeting to adjourn which passed by a nearly two-thirds majority.*” The motion by Precinct Chair Fred Sunderman for adjournment included words with the intent that the adjournment was until a time when the meeting could be reconvened. Calls for a “division” of the vote were not recognized. The adopted FC-A Majority agenda required the completion of business before adjournment (RONR 21:3).
- The County Chairman repeatedly employs derogatory terms (“*They failed to hijack the Party*”; “*Humiliated by their abject failure*”; “*went (and remains) entirely off the rails*”) to refer to the FC-A Majority (and me by association).



- The County Chairman misstates the events of the 7/23 EM by saying “*Dale Inman hijacked the meeting, claiming to conduct a second Organizational Meeting (State Rules allow only a single organizational meeting per biennium, which had already occurred)*” The facts are that the County Chairman had not called any meeting to order on July 23, 2022, so those present chose to proceed with the agenda included with the Robert Walker meeting call and chose Dale Inman to call the meeting to order as stated in the meeting call, “*we must reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment.*”
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- The County Chairman states in the January 17, 2023 email “*while the rest of Montgomery County Republicans were all busy campaigning to elect good Republicans to office, they focused their efforts on trying to “remove” our County Chairman from office.*” Countless testimonies and documentation will confirm that FC-A Majority Precinct Chairs worked extensively to get-out-the-vote to get Republican candidates elected.
- The County Chairman slanderously states that others “*financed the campaign despite the money taken by Bouche, Wertz, and Shirley.*” The funds allegedly “*taken*” exist, are secure, have been used solely for legitimate party expenses, and were not “*taken*” by FC-A Majority leadership.

- The County Chairman defames the FC-A Majority, *“In all appearances, this Freedom Caucus has little, if any regard for the Republican voters of Montgomery County”* despite the tireless efforts of the FC-A to inform Montgomery County voters and to get them to the polls to vote for Republican candidates. The FC-A Majority Victory Committee mailed 33,000 push cards to voters throughout the county and it is estimated that 10,000 to 12,000 doors were knocked. The FC-A Majority Victory Committee printed approximately 20,000 push cards to cover all 111 precincts, though the County Chairman's group did not pick up and distribute the ones for their precincts.
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- The January 17, 2023 email was sent to the entire distribution list in possession of the County Chairman's minority “group,” which includes all email addresses known to the County Chairman from previous bienniums. The defamations thus went to countless numbers of my Precinct 17 constituents. Those who I've never had an opportunity to meet will have been presented with a false, slanderous, defaming depiction of me. Even those who know me will have cause to wonder if they had a wrong opinion of me. This will damage my ability to be believed by my constituents, thus crippling my ability to accomplish the duties required of a Precinct Chair.

On January 23, 2023 an email was sent specifically addressed to me entitled, “Notice of Investigation for Violations of the MCRP Code of Conduct and Ethics,” from **Chairman James Byers, Conduct and Ethics Committee, Montgomery County Republican Party, Texas**. A copy of this email has been provided to the legal team by John Wertz. Other FC-A Majority Precinct Chairs have received almost identical emails.

- The email begins, “*This is your notice that the MCRP Committee on Conduct and Ethics on January 20, 2023, @6:30 PM will examine evidence of actions you have made in violation of the MCRP Code of Conduct and Ethics (attached), RPT Rules, and the Texas Election Code. You will be given an opportunity to speak on your behalf, but at that time a vote will be taken only on whether to proceed with a formal investigation.*”

Please note that the email was sent on January 23<sup>rd</sup> informing me of an inquisition that was to take place on January 20<sup>th</sup>. But I suppose that was 'made right' by an email with the same Subject from the same sender that was sent approximately an hour later informing me that the date of my inquisition was changed to January 27<sup>th</sup>.

- The email slanderously says that I “*voted to authorize the execution of that plan to defraud Sunflower Bank, NA*”, thus accusing me of authorizing “*bank fraud.*”
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- The email alleges “*With your authorization, Charles Shirley fraudulently files financial reports as the MCRP Treasurer with the TEC and you refuse to file lawfully as a PAC*”, thus accusing me of being complicit in fraudulent filing of official reports.
- The email accuses me of “*four (4) Consecutive CEC Meetings*”, listing meetings called by the County Chairman's minority, not by the FC-A. I have attended all FC-A Majority called CECs. It is the County Chairman's clear intent to remove me from the office of Precinct Chair.

I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on February 7, 2023.



/signed/

Dale Fessenden

Chairman, Precinct 17

Montgomery County, Texas



**DECLARATION**

(TEX. CIV. PRAC. &amp; REM. CODE § 132.001)

My name is Dale R. Inman ; my date of birth is [REDACTED] and my address is [REDACTED]  
[REDACTED] I declare under penalty of perjury that the following statements are true and correct:

I am a resident of Montgomery County and voted in the 2022 Republican Primary.

I hold the position of Republican Precinct Chair 27 in Montgomery County, having obtained that seat as indicated below by the checked paragraph:

☒ ELECTED AND NOT DISPUTED - I was elected to the office of Precinct Chair during the 2022 Republican Primary and to my knowledge, no one contests my election or position as a duly elected Precinct Chair and member of the CEC.

☐ APPOINTED AND NOT DISPUTED - I was appointed to the office of Precinct Chair on \_\_\_\_\_, after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. To my knowledge, no one has challenged my position and all members of the CEC accept my appointment.

☐ APPOINTED BUT DISPUTED - I was appointed to the office of Precinct Chair on \_\_\_\_\_, after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. I am aware that Brian Christ has claimed to have appointed someone else to this position or otherwise asserts that my claim to this position is not valid.

**Background:**

- The Organizational Meeting (OM) of the Montgomery County Republican Party (MCRP) was held on July 19, 2022 and video-recorded.
- The July 23, 2022 Emergency Meeting (7/23 Email), also video-recorded called by Robert Walker was properly noticed and distributed by the County Chairman and included the stated purpose of "*we must reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment.*"
- The January 17, 2023 "What's Going On in the Montgomery County Republican Party?" email was distributed by the faction of the MCRP led by County Chairman Bryan Christ with his name headlining the authority. The names of the "Freedom Caucus" (FC) leaders were named, but the Precinct Chairs were unnamed, thus all Precinct Chairs are implicated.
- ARTICLE VI, Section 6 of the Bylaws of the MONTGOMERY COUNTY REPUBLICAN PARTY OF TEXAS 2020-2022, Re-Enacted July 19, A.D. 2022 (Bylaws) states that "*The agenda for all county executive committee meetings must be approved by majority vote at the beginning of each meeting.*" The County Chairman refused to convene the July 23, 2022 Emergency Meeting (EM) until the County Executive Committee (CEC) "voted" on which agenda would be followed – the agenda of the meeting call by Robert Walker (the first call) or the agenda of the meeting call by James Byers (the second call). Both meeting calls listed the same date, time, and location.



Harms to me, as Precinct 27 Chairman, from the January 17, 2023 email:

- The County Chairman falsely alleges that *“there is a minority group of elected Precinct Chairs calling themselves the Freedom Caucus”* when the FC- affiliated “group” (FC-A) was clearly the majority attending the OM, by adopting the FC-A amended agenda by a vote of 47 Yeas and 31 Nays, and in the majority at the 7/23 EM, which was opened as a reconvening of the OM. The false allegation associates me with a “group” purported to be in defiance of the will of the majority.
- The County Chairman falsely alleges that the FC-A (and me by association) has *“no regard for the law and no regard for Party Rules, and they have a complete disregard for the authority and responsibility of the County Chairman.”*
- The County Chairman, regarding the July 19, 2022 OM, misconstrues the motion for adjournment as follows: *“Out of frustration, their own caucus members called for the meeting to adjourn which passed by a nearly two-thirds majority.”* The motion by Precinct Chair Fred Sunderman for adjournment included words with the intent that the adjournment was until a time when the meeting could be reconvened. Calls for a “division” of the vote were not recognized. The adopted FC-A agenda required the completion of business before adjournment (RONR 21:3).
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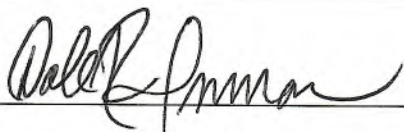
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Executed in Montgomery County, State of Texas on February \_03\_, 2023.

/signed/

\_\_\_\_ Dale Inman \_\_\_\_\_



Chairman, Precinct \_\_\_\_27\_\_\_\_  
Montgomery County, Texas

**Declaration**

Pursuant to TEX. CIV. PRAC. & REM. CODE § 132.001, I, Kristen Plaisance, make the following declaration/affidavit:

**Affiant** supports in writing the following:

1. My full name is Kristen Cole Plaisance, my date of birth is [REDACTED] My address is [REDACTED]
2. I declare under penalty of perjury that I personally know or believe that all allegations are true and correct to the best of my knowledge.
3. I am a registered voter of Montgomery County and the State of Texas and have been a resident of this State since 2001.
4. I applied to be a Montgomery County Republican Party Precinct Chair in November of 2021. The Precinct Chair position in my precinct was vacant. Since it was vacant, I interviewed for and was appointed the Precinct Chair for Precinct 37 of Montgomery County. The position would terminate in June of 2022.
5. I also filed a second application to appear on the May 2022 ballot for the same position in the 2022-2024 biennium. I did not have a primary opponent for the 2022 election, so I did not have to appear on the ballot but was elected to the position for the 2022-2024 biennium. My position as Precinct Chair for Precinct 37 of Montgomery County for the 2022-2024 biennium is not in question by either side of this dispute.
6. I have personally witnessed events concerning a division between Montgomery County Republican Party Chairman, Bryan Christ, and the majority members of the Montgomery County Republican Party Executive Committee ("CEC"), and write this declaration in support of legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC's orderly participation in county elections, as I am aware that Chairman Christ is not accurately recognizing properly seated chairs or managing the CEC's resources, such as the space leased by the Montgomery County Republican party, its bank account, and its website.
7. Prior to my applying for the Precinct Chair position, I did not know nor associate with any of the parties involved in either side of this dispute.
8. On June 25, 2022, I met Chairman Christ and some other Precinct Chairs from the county for the first time at a bylaws workshop that was called by Chairman Christ. Chairman Christ stated at the beginning of the meeting that the intent of the workshop was to allow all precinct chairs to provide input into the drafting of the bylaws for the new biennium. This was to be the first of multiple bylaw workshops I would attend.
9. I missed 2 County Executive Committee (CEC) meetings after becoming a Precinct Chair because I was very ill for one and due to my son's college graduation out of state for the other. This was my first encounter with most of the CEC members and the first time I would observe how the body works together. This was not a CEC meeting, so attendance was not statutory. As such, it was a smaller group of around 15-20 precinct chairs by my best estimate.



10. It appeared to me from the beginning that there was animosity between some of the members of the committee. There was a small group in this meeting advocating for all power to be condensed in the hands of the Chairman. For example, they wanted the chairman to appoint all officers, as opposed to the body of the CEC nominating and voting on the officers. They also wanted only the Chairman to have the ability to nominate precinct chairs for vacant positions, as opposed to having a vacancy committee vet and nominate people for open positions.
11. There was another group in the meeting advocating that Chairman Christ not be able to nominate anyone.
12. For Chairman Christ's part, he seemed to remain out of the back-and-forth conversation, not really saying much. However, at one point, someone accused him of wanting to be a dictator. At that Chairman Christ made a point that he did not want to appoint the officers and that he only wanted to be allowed to make nominations for vacancies, not be the only one that could make nominations. He repeated this statement multiple times throughout the conversation after this.
13. Someone made a motion (it may have been me, but I cannot recall for sure) that Chairman Christ should be allowed to make nominations for officers and vacant chairs as well as the rest of the CEC, to the vacancy committee for the vacancy committee to vet them and then the CEC as a body would vote on the nominations. The motion was voted on and passed by a clear majority of those present. According to Chairman Christ at the start of the bylaw workshop, there would also be an opportunity at the organizational meeting for others to motion to amend and change things, so the entire body could vote to change this later if they did not want it.
14. However, even after everyone had already voted, arguments kept being made that Chairman Christ should appoint all the officers and be the only one to nominate new chairs. I finally got up and made the point that Chairman Christ had already stated multiple times that he did not want what they were asking for, and the vote had already been taken, so we should move on and stop wasting time on this one thing. At that point Chairman Christ stated that maybe he would like to appoint his own officers because he had to work side by side with them. **It appeared to me that I was watching an orchestration between Chairman Christ and certain members of the group. It seemed that Chairman Christ's roll was to appear neutral and uncaring about the outcome of the votes, and it was the other roll pleyer's job to vigorously advocate for what the Chairman really wanted. This argument continued for most of the entire 2-hour meeting and little else was accomplished, even though the vote had already been taken. Chairman Christ never ruled against these repeated arguments so that we could move on.**
15. I attended all but one of several bylaw workshops, all were multiple hours long. I negotiated in good faith with my fellow Precinct Chairs and was happy to concede to the majority when they voted against me. However, there were multiple other incidents where there was a clear consensus of the majority on an issue but a couple of people, with the capitulation or assistance of Chairman Christ, held up the meeting with repeated arguments that had already been voted against. One such example was the allowance of online (by email) voting. Because of these tactics, we were not able to get through the entire bylaws in the workshops, despite adding additional days and hours to the workshops.
16. During one of the first workshops Chairman Christ asked that no one go into the online working bylaw document and make changes because the document was getting cluttered

with all the draft changes. He asked that we instead use the comments tool and make comments about any proposed changes. However, after this statement, he allowed one of his supporters and main instigators of issues in the bylaw workshops, Precinct Chair Prada, to go into the document and redline most of the changes made during the workshops and to add in provisions that had clearly been voted against in the workshops such as the online (email) voting provision.

17. On July 12, 2022, Chairman Christ sent out an email (A true and faithful copy is attached as Exhibit A) to serve as the official meeting call for the 2022-2024 CEC Organizational Meeting to be held on July 19<sup>th</sup>. This email included attachments of the proposed bylaws (A true and faithful copy is attached as Exhibit B) and agenda for the meeting (A true and faithful copy is attached as Exhibit C). The email stated that: “The proposed bylaws represent one of many possibilities. Where there was significant debate, variations have been captured in a separate doc. This doc will be circulated soon as a set of possible amendments (which we called options) during the workshops. We will walk through the proposed bylaws and apply **these options** through the amendment and voting process.” (Bold for emphasis by me) **The choice of the words “these options” indicated to me that the options presented in the document soon to be circulated were the only options that were to be considered for amendment. I made a mental note to review the proposed bylaws and amendment documents very carefully.**
18. After reading through the proposed bylaws attached to Chairman Christ’s email I noted that many provisions of the document were not consistent with what the majority had voted for in the workshops.
19. On July 13, 2022, I sent an email (A true and faithful copy is attached as Exhibit D) to Chairman Christ asking if the proposed amendments document had been sent out, because I had not received the document.
20. Only July 14, 2022, Chairman Christ responded to my email (A true and faithful copy is attached as Exhibit D) that the document would be ready later that day. Later in the day I did receive another email (A true and faithful copy is attached as Exhibit E) with the amendment document attached (A true and faithful copy is attached as Exhibit F). I was very disappointed to see that there were multiple provisions in the bylaws that were not consistent with the majority vote, that also did not contain a change provision in the proposed amendment document.
21. On July 18, 2022, Precinct Chair John Wertz sent an email (A true and faithful copy is attached as Exhibit G) that included an attachment that was an email sent from Precinct Chair James Byers to the parliamentarian, Jason Millsaps, that had been chosen by Chairman Christ to officiate the July 19<sup>th</sup> organizational meeting. (A true and faithful copy is attached as Exhibit H) Chairman Christ was copied in the email as well. Byers’ email contained a script of how the 3 men (Byers, Millsaps and Christ) plus an unnamed volunteer would control the meeting and what amendments would be allowed to be addressed. Mr. Byers’ email included a shocking note that stated: “the blank lines will be a volunteer, **whom I will prep Saturday. Whoever volunteers will not be able to speak against the amendments.**” (bold added for emphasis by me)
22. Mr. Byers responded to Mr. Wertz’s email (A true and faithful copy is attached as Exhibit I) and attempted to explain away his actions as him simply laying out his understanding of the issues to the parliamentarian for the July 19<sup>th</sup> meeting. I will allow Mr. Byers original email (Exhibit H) to speak truth for itself.

23. On July 19, 2022, at 8:35 AM I sent an email (A true and faithful copy is attached as Exhibit J) to Chairman Christ outlining my concerns about the email between himself, Byers and Millsaps. In this email I discussed my concerns that there were provisions of the bylaws that did not represent the discussion and majority votes during the workshops and that they were also not placed on the proposed amendment document. I discussed my disappointment in what clearly looked like collusion to prevent open debate and manipulation of the process. I asked Chairman Christ to be a better man than that and asked for open debate and an unmanipulated process. I also suggested that Jason Millsaps should resign as parliamentarian for this meeting.
24. Chairman Christ called me soon after to address my concerns. To the best of my memory, Chairman Christ stated that he cannot control Mr. Byers' email habits nor when Mr. Byers copies him in an email. He stated that he had spoken to Mr. Byers and told him, like he would tell me now, that he has no intention of limiting debate, or motions to amend, to only those amendments in the document. He assured me that all motions to amend any part of the bylaws would be honored and voted on. I suggested that he should send out an email stating what he told me because many people were rightfully upset and believed that there would be no good faith negotiation. He also stated that he could not replace Jason Millsaps this close to the start of the meeting because there were not many parliamentarians that would work with our group because of past issues.
25. Chairman Christ sent out an email (A true and faithful copy is attached as Exhibit K) to all precinct chairs stating: "I am aware of an allegation that I intend to conduct the meeting in such a way as to stifle debate and the amendment process. I want each of you to know that will not be the case. I assured the workshop participants that other options and amendments will be heard. I will be keeping my word and I will be holding feet to the fire for those who plan to go back on theirs."
26. After seeing Chairman Christ announce publicly that he intended to honor his promise that we would have full and open debate on any options and amendments I wondered if perhaps I had misjudged him. I even sent him a reply email and apologized for jumping to conclusions. (A true and faithful copy is attached as Exhibit L) However, his later actions would confirm that my initial concerns about him were correct.
27. During the organizational meeting on July 19, 2022, Precinct Chair Wertz made a motion to substitute the agenda for the meeting. The substitute agenda allowed for officers and new precinct chairs to be voted in during this meeting and the original agenda did not. The substitute agenda also prevented the meeting from being adjourned until all business had been conducted.
28. As can be seen on the video of the July 19, 2022, meeting Precinct Chair Byers and others tried multiple tactics to frustrate the process of adopting the substitute agenda. Their attempts were unsuccessful as a clear majority out voted them each time.
29. The substitute agenda was finally adopted after close to one and a half hours by a majority of 47 for, including myself, and 31 against. Of important note is that the substitute agenda adopted clearly stated that the meeting could not be adjourned until all business had been conducted.
30. After the agenda was adopted, someone motioned for the words "Freedom Caucus" to be stricken from the agenda. No reason was given for the need to strike the words. This motion was out voted 31 or 32 in favor (it was unclear to me if there was a 32<sup>nd</sup> voter or not) of striking the words and 42 against striking.



31. Precinct Chair Sunderman then made a motion to call the question. This was followed by some discussion as to whether or not the agenda had been adopted.
32. Chairman Christ stated that we had not adopted the agenda but that we had approved a motion to substitute the agenda and stated that Precinct Chair Coats had made a motion to adopt the agenda and that the motion had been seconded.
33. Chairman Christ then asked if there were any objections to adopting the substitute agenda. Chairman Christ, Mr. Byers nor anyone else stood to object to the title of the document as written nor anything else about the agenda. Chairman Christ then announced that seeing no objections the agenda was adopted.
34. When watching the video of the July 19, 2022, meeting you can see at 1:34:29 that as Chairman Christ is still announcing that the substitute agenda is adopted, Mr. Byers is already moving to rise. Precinct Chair Byers makes a point of order and Chairman Christ recognizes him. Precinct Chair Byers then claims that the title printed at the top of the adopted agenda made it so the CEC would now have to leave so that the “Freedom Caucus” could meet because the title printed on the top of the page had somehow changed the body that was meeting. This claim was made despite the fact that the title stated that it was the **MCRP** (MCRP stands for Montgomery County Republican Party) **Organizational Meeting** Freedom Caucus Substitute Agenda and that we had voted to adopt the substitute agenda as the MCRP CEC. (Bold for emphasis by me) **Chairman Christ quickly ruled this a valid motion and acted as if this was a grave concern that he would need to discuss with the parliamentarian. He took a motion for a 10-minute break.**
35. Why didn’t Chairman Christ or Mr. Byers address their issues with the title prior to the agenda being adopted? According to RONR 41:63, once an agenda is adopted, it requires a 2/3 vote to change anything on the agenda.
36. When the break was over Chairman Christ announced that the mere title of the page could somehow leave the entire meeting open to litigation or a possible voidance of the meeting. Chairman Christ never said who exactly would spend money litigating the title of a document or where any law, code or rule made specific statements on exactly what needed to be in the title of the agenda for the document to be considered legitimate.
37. At this point there were multiple attempts by Chairman Christ, Precinct Chair Byers and others to get the vote to adopt the substitute agenda overturned with a motion to reconsider. They were unsuccessful, leaving the adopted agenda in place.
38. After three and a half hours Precinct Chair Sunderman made a motion to adjourn “until the 2 camps can resolve this and call us back”. This motion was out of order because the adopted agenda stated that the meeting could only adjourn after all business was complete. Instead of calling the motion out of order, Chairman Christ quickly took a vote on the motion to adjourn, ignored multiple calls for division and declared we were adjourned.
39. On July 20, 2022, I received an email (A true and faithful copy is attached as Exhibit M) from Precinct Chair Robert Walking petitioning my signature to call an emergency meeting to be held on July 23, 2022. The stated purpose of the meeting was: “that we must reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment”. I agreed to sign the petition via email. (A true and faithful copy is attached as Exhibit M)
40. On July 21, 2022, 3:38pm, Chairman Christ sent an email (A true and faithful copy is attached as Exhibit N) acknowledging that Precinct Chair Walker’s meeting call was in

order essentially approving the stated purpose of the meeting which was to reconvene the July 19, 2022, organizational meeting.

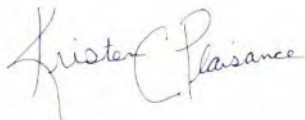
41. On July 21, 2022, 4:48pm, Chairman Christ sent a 2nd email (A true and faithful copy is attached as Exhibit O) claiming that Precinct Chair James Byers had also called an emergency meeting for the same date, time and location as PC Walker's meeting and declared that PC Byers call was also in order.
42. On July 23, 2022, Chairman Christ attempted to force the body of the CEC to take a nonbinding vote, outside of the meeting, as to which meeting, PC Byers' or PC Walker's, we would conduct. Chairman Christ was outvoted by a majority but refused to call any meeting to order at the properly called meeting time. PC Walker called his meeting to order. Chairman Christ continued to disrupt the meeting and was finally asked to leave.
43. Chairman Christ has since scheduled multiple other dueling meetings on top of already properly noticed meetings, at same date & time, assuring conflict, confusion & division (especially amongst new chairs), dividing everyone's loyalties, time, and effort.
44. I have voted on multiple occasions with the majority of the CEC including voting in favor of the substituted agenda on July 19, 2022. The actions of Chairman Christ have disenfranchised my, and my constituents, votes by colluding with others to ignore and manipulate the majority votes in the bylaw workshops, the majority vote in favor of the substituted agenda, as well as all the events that have transpired since in further attempts to thwart the will of the majority. This includes, but is not limited to, not recognizing majority votes on appointments to vacant precinct chair positions and later appointing people to precent chair positions that were previously filled, leaving dueling precinct chairs in multiple precincts.
45. I am aware that dueling sets of precinct chairmen will cause difficulties as the election draws near. Precinct chair lists are public information (see section 172.029(5)b of the Texas Election Code) and I am aware that candidates depend on these lists.
46. Additionally, precinct conventions are historically run by precinct chairs or their agents and allies. If this matter is not resolved, we may well have competing claims and disputes about which precinct convention held for a precinct is valid and which slate of elected delegates will attend the state convention.
47. Further, on January 17, 2023 an email was distributed by Chairman Christ and his minority group titled "What's Going On in the Montgomery County Republican Party?" The email names who they call the "Freedom Caucus" (FC) leaders, but the Precinct Chairs were unnamed, thus all Precinct Chairs are implicated.
48. In the January 17, 2023, email Chairman Christ falsely alleges that *"there is a minority group of elected Precinct Chairs calling themselves the Freedom Caucus"*. The fact of the matter is that the "Freedom Caucus" affiliated group was clearly the majority attending the organizational meeting on July 19, 2022, as is evidenced by the fact that the substitute (Freedom Caucus suggested) agenda was adopted by a vote of 47 Yeas to 31 Nays. They were also in the majority at the 7/23 meeting, which was opened as a reconvening of the organizational meeting. However, since I voted with the majority in both of these meetings, and those meetings are public record, these false allegations associate me with a "group" purported to be in defiance of the will of the majority.
49. Chairman Christ falsely alleges that the Freedom Caucus group (and me by association) has *"no regard for the law and no regard for Party Rules, and they have a complete disregard for the authority and responsibility of the County Chairman."*

50. Chairman Christ, regarding the July 19, 2022, organizational meeting, misconstrues the motion for adjournment as follows: *“Out of frustration, their own caucus members called for the meeting to adjourn which passed by a nearly two-thirds majority.”* The motion by Precinct Chair Fred Sunderman for adjournment included words with the intent that the adjournment was until a time when the meeting could be reconvened. Calls for a “division” of the vote were purposefully ignored by Chairman Christ. The properly adopted substitute agenda required the completion of business before adjournment.
51. Chairman Christ repeatedly employs derogatory terms (*“They failed to hijack the Party”*; *“Humiliated by their abject failure”*; *“went (and remains) entirely off the rails”*) to refer to the Freedom Caucus group (and me by association).
52. Chairman Christ misstates the events of the 7/23 meeting by saying *“Dale Inman hijacked the meeting, claiming to conduct a second Organizational Meeting (State Rules allow only a single organizational meeting per biennium, which had already occurred)”* The facts are that the County Chairman had not called any meeting to order on January 23, 2023, so those present chose to proceed with the agenda included with PC Walker’s meeting call and chose Dale Inman to officiate the meeting. As stated in the meeting call this was a reconvening of the organizational meeting, not a second organizational meeting, *“we must reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment.”* Chairman Christ had approved the stated purpose of PC Walker’s meeting in his email on July 21, 2022, 3:38pm, (Exhibit N)
53. Chairman Christ misstates the number of Precinct Chairs present at the 7/23 meeting - *“with just 37 out of 111 Precinct Chairs present, far shy of the required quorum”*. The 1<sup>st</sup> Role Call records 12 vacancies and 55 Precinct Chairs present in-person. He misstates that there were only “37” present, as there were 37 remaining after the Chairman's caucus (18 precinct chairs) left in protest and the vote on the Bylaws was 37 Yeses and 0 Nays. Republican Party of Texas (RPT) Rule 8e, regarding the organizational meeting of the CEC, makes no statements regarding a required quorum for the organizational meeting. RPT Rule 9 specifically addresses quorums. Rule 9a states, *“Non-Statutory Business and Filling Vacancies – At County or District Executive Committee meetings, one-fourth (1/4) of the membership, excluding vacancies, shall constitute a quorum for conduct of non-statutory business.”* Rule 9b states, *“Statutory Business – At SREC, County or District Executive Committee meetings, a quorum for conduct of statutory business shall consist of those members present.”*
54. Chairman Christ defames the Freedom Caucus group (and me by association) in the January 17, 2023, email, *“the Freedom Caucus broke away from the official Republican Party and have done their best to sow discord and cause confusion in Montgomery County at every opportunity since.”* It is Chairman Christ who has repeatedly sought to cause discord and confusion.
55. Chairman Christ states in the January 17, 2023, email *“while the rest of Montgomery County Republicans were all busy campaigning to elect good Republicans to office, they focused their efforts on trying to “remove” our County Chairman from office.”* I attended multiple meetings and events where the majority of the party (the “Freedom Caucus group”) worked extensively and tirelessly to get-out-the-vote to get Republican candidates elected and to conduct party business that had nothing to do with Chairman Christ.
56. Chairman Christ slanderously states that others *“financed the campaign despite the money*

*taken by Bouche, Wertz, and Shirley.*” The funds allegedly “*taken*” have been secured by the Montgomery County Republican Party County Executive Committee Treasurer, Charles Shirley, and reported as such with the Texas Ethics Commission as required by law. The funds have been used solely for legitimate party expenses as voted on by the majority of the CEC and were not “*taken*”.

57. Chairman Christ defames the majority of the Montgomery County Republican Party County Executive Committee by stating, “*In all appearances, this Freedom Caucus has little, if any regard for the Republican voters of Montgomery County*”. The group he defames worked tirelessly to inform Montgomery County voters and to get them to the polls to vote for Republican candidates. The Victory Committee of the Montgomery County Republican Party CEC, mostly comprised of Freedom Caucus members, mailed 33,000 push cards to voters throughout the county and it is estimated that 10,000 to 12,000 doors were knocked. This Victory Committee also printed approximately 20,000 push cards to cover all 111 precincts, though Chairman Christ's small minority of precinct chair followers did not pick up or distribute the ones for their precincts. Their precincts’ push cards were distributed to voters by the same majority group they defame.
58. Chairman Christ claims that “*From the beginning, we attempted to have formal talks with them, then informal discussions, and even had a mediation sponsored by the State Party. The Freedom Caucus rebuffed all of these attempts, insisting that the County Chairman must first resign before they would agree to anything—all of this in writing.*” The documented notes of the mediation by SREC Officials Committee Member Matt Patrick, one of the mediation team from the RPT, records how patently false this claim is.
59. The January 17, 2023, email was sent to the entire distribution list in possession by Chairman Christ's minority group which includes all email addresses from previous bienniums. The defamations thus went to countless of my Precinct 37 constituents. Those whom I've never had an opportunity to meet will have been presented with a false, slanderous, defaming depiction of me. Even those who know me will have cause to wonder if they had a wrong opinion of me. This will damage the trust of my constituents, thus crippling my ability to accomplish the duties required of a Precinct Chair and potentially damage my reputation in my community in general as well as for future elections.
60. I have employed Warren V. Norred of Norred Law, PLLC to resolve the dispute and have contributed funds to pay for him and his firm for that purpose.
61. I personally know or believe that all allegations in the complaint and this affidavit to be true and correct to the best of my knowledge.

Executed in Montgomery County, 31<sup>st</sup> day of January 2023.



Kristen Plaisance  
22355 Log Orchard Lane  
Porter, TX 77365



Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

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**Notice of CEC Organizational Meeting**

1 message

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**Bryan Christ** <bryan4mcrp@gmail.com>  
Bcc: kristencplaisance@gmail.com

Tue, Jul 12, 2022 at 5:58 PM

All Pct Chairs,

This is the official meeting call for the 2022-2024 CEC Organizational Meeting to be held on July 19th at 6:30p at the Sadler Building. Attached you will find the agenda for the meeting and the proposed bylaws. The proposed bylaws are the collective product of the 5 workshops that many of you participated in. The sharing of ideas and collaboration was wonderful!

The proposed bylaws represent one of many possibilities. ***Where there was significant debate, variations have been captured in a separate doc.*** This doc will be circulated soon as a set of possible amendments (which we called options) during the workshops. ***We will walk through the proposed bylaws and apply these options through the amendment and voting process.***

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Bryan Christ  
MCRP Chairman

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**2 attachments****MCRP Texas Bylaws for 2022-2024.pdf**  
252K**2022 Organizational Meeting.pdf**  
84K

**Bylaws of the MONTGOMERY COUNTY REPUBLICAN PARTY OF TEXAS  
COUNTY EXECUTIVE COMMITTEE 2022-2024**

Adopted July 19, A.D. 2022

**ARTICLE I – Name**

The name of this organization shall be the “Montgomery County Republican Party of Texas County Executive Committee”, hereinafter referred to as the “CEC”.

**ARTICLE II – Purpose**

For the purpose of advancing the political interests and effectiveness of Montgomery County Republicans and complying with laws governing political parties, the CEC shall:

1. Recruit, promote and support the election of Republican candidates to public office;
2. Perform such duties as specified in the Texas Election Code (TEC), Republican Party of Texas (RPT) Rules and these Bylaws;
3. Observe all state and federal election laws and the RPT Rules;
4. Promote the State Republican Party platform and positions;
5. Educate and inform voters through voter registration and get out the vote efforts; and
6. Perform such other duties as are consistent with the objectives stated in this Article.

**ARTICLE III – Membership**

**Section 1. Composition**

The voting members of the CEC shall consist of the County Chairman and the Precinct Chairmen of the respective election precincts, otherwise known as the County Executive Committee (CEC).

**Section 2. Eligibility**

To be eligible to be a candidate for or to serve as Precinct Chairman or County Chairman, a person must be a qualified voter residing (permanent residence) within the bounds of the entity represented, and that person must have voted in the most recent prior Republican primary or have taken an oath of affiliation to the Republican Party.

**Section 3. Term**

Each CEC member serves for a term of up to two (2) years (or until the Officer replacement is elected) ending on the twentieth (20th) day after the primary runoff election day.

**Section 4. Filling Vacancies**

Any vacancy in the office of Precinct Chairman shall be filled by appointment of the CEC. The person selected to fill the vacancy must be vetted by the Vacancy sub-committee (Article VII, Section 2), receive a majority vote of those CEC members voting and must be eligible (Article III, Section 2).

- A. Except as provided in section B, one-third (33.33%) of the total membership, excluding vacant chairs, of the CEC must participate in the election to fill a vacancy in the office of Precinct Chair (RPT Rule 9.a).
- B. If there is only one candidate to fill a vacancy and that person was elected as a Precinct Chairman in the most recent primary election in Montgomery County and is eligible to serve in the office, twenty-five percent (25%) or more of the total membership of the CEC must participate in the election to fill the vacancy (RPT Rule 9.a).
- C. The CEC may authorize a vote to fill a vacancy in person, by mail or by email (RPT Rule 7.c). Votes not cast in person must be received by the Secretary and/or County Chairman by 5:00 PM the day of the CEC meeting.
- D. Candidates who have served previously as a Precinct Chair shall be seated at the organizational meeting, provided there are no challengers. In the event of two or more candidates, the vacancy will be addressed through the normal vacancy vetting process.

## **Section 5. Duties of CEC Members**

- A. Follow the RPT Rules and CEC Bylaws for 2022-2024.
- B. In all matters concerning the Republican Party, all CEC members, as well as Party Officials, must observe civility with mutual respect of all persons.
- C. Provide the County Chairman with your name and keep the County Chairman apprised of your current mailing address, phone number, and email address (RPT Rule 8.h). This information, with the exception of the physical address, may be placed on the MCRP website. An exception may be made to keep confidential such information for certain government officials who also serve as Precinct Chair [Gov. Code 552.1175].
- D. Regularly attend CEC meetings.
- E. Serve as Election Judge or identify an Election Judge for their Precinct for each election.
- F. Fulfill the duties outlined in the Precinct Chair Handbook.
- G. Promote party news, events and activities to their constituents. And
- H. Support the purposes listed in Article II.

## **Section 6. Resignation and Removal**

- A. Resignation. For a member or Officer of the CEC to resign:
  - 1. The member or Officer must resign through the MCRP website form; and the notification of the resignation/vacancy shall be immediately distributed automatically to all members of the Steering Committee, and give written notice to the Secretary delivered in person, by mail, or email.
  - 2. If the notice is not specific to the position of resignation, it applies to all positions held within the CEC.
  - 3. If the notice is not specific to the effective date of the resignation, it is effective immediately upon receipt through the website form and/or by the Secretary and/or County Chairman.
- B. Removal.
  - 1. Failure to follow the duties by any member is subject to formal reprimand, censure, and removal in accordance with the resolution adopted by the CEC, RPT Rules 8.j, 8.m and 8.n. The quorum to consider the matter is 50% of the non-vacant Precinct Chairs, present at the beginning of the meeting. Approval requires a vote of two-thirds ( $\frac{2}{3}$ ) or more of those present.

2. Absence from four (4) consecutive CEC meetings may be grounds up to and including removal by majority vote.

## ARTICLE IV – Officers

### Section 1. Elected and Appointed Officers

The Officers of the CEC shall be the County Chairman, the Vice Chairman, the Secretary, and the Treasurer.

#### A. County Chairman

1. The County Chairman is the Presiding Officer, elected at the general primary election by majority vote of the qualified voters of the county who vote in the primary on that office or elected by the CEC and is subject to all applicable laws, RPT Rules and these Bylaws.
2. The County Chairman is an ex officio member of all MCRP Committees and Subcommittees.

#### B. Vice Chairman, Secretary, and Treasurer

1. The Vice Chairman, Secretary, and Treasurer must currently reside within Montgomery County and continue to do so while serving as an Officer. They must have voted in the most recent Republican primary election.
2. The Vice Chairman and Secretary shall be elected by the CEC at the biennial organization meeting.
3. Elections at the biennial organization meeting.
  - i. **Nominations** shall be made from the floor, which consists of the CEC and the County Chairman. After nominations have been made, the nominees shall draw numbered lots as to speaking order. The nominee drawing the number 1 shall speak first. Each nominee shall have a total of three (3) minutes to speak. Each nominee may speak on their own behalf and/or have representatives speak. If the nominee is not present, they may appoint someone to speak on their behalf.
  - ii. **Voting:** After nomination speeches have concluded, voting shall be conducted by paper ballot. The Chairman shall appoint three (3) non-nominated Precinct Chairs to count the ballots. Each nominee may have one (1) teller to witness the vote counting. The candidate receiving the majority of the votes shall win the election.
  - iii. **Runoff:** If no candidate receives the majority of the votes, a runoff election shall be conducted for the two (2) recipients receiving the two highest vote counts. There shall be no additional time for speeches. A new paper ballot shall be used.
  - iv. **Voice Vote:** If there is only one nomination for a position, the voting may be by voice vote, or the Presiding Chairman may declare the sole nominee elected.
4. The Treasurer shall be appointed/replaced by the County Chairman and presented at the CEC meeting following the appointment.
  - i. **Qualifications:** A professional in business accounting, such as a CPA.
  - ii. **Non-voting:** The Treasurer will be a non-voting member of the CEC.

### Section 2. Officer Terms

The term of office for all Officers expires concurrently with that of the CEC.



**Section 3. Removal of Officers**

If an Officer violates any Federal or State Law, RPT Rules, or these Bylaws as it pertains to their duties as an Officer of the CEC, the Officer may be removed by a two-thirds ( $\frac{2}{3}$ ) vote of the CEC members present with at least 50% of the non-vacant Precinct Chairs voting.

**Section 4. Filling Officer Vacancies**

- A. County Chairman: A vacancy in the office of County Chairman shall be filled in accordance with the provisions of the Texas Election Code. A majority of the total membership of the CEC must participate in the election to fill a vacancy in the office of County Chairman.
- B. Vice Chairman, Secretary or Treasurer: A vacancy in the office of Vice Chairman, Secretary or Treasurer shall be filled in accordance with the procedures in Article IV, Section 1 of these Bylaws at the next called CEC meeting with at least 40% of members voting.

**Section 5: Officer Duties**

Duties of the Officers shall be as follows:

- A. County Chairman shall:
  - 1. As the Presiding Officer of the CEC, ensure compliance of the CEC with all applicable federal and state laws, with these Bylaws, with the Rules of the RPT and, where they do not conflict with Roberts Rules of Order Newly Revised.
  - 2. Preside over the Steering Committee.
  - 3. Make available relevant information to Steering, Permanent and Ad-Hoc Committees, within a reasonable time, depending on the urgency of the situation.
  - 4. Assist with garnering financial support for the Montgomery County Republican Party, an important duty and responsibility of the chairman.
  - 5. Supervise the overall conduct of primary elections.
  - 6. Administer a biennial County Primary and manage the county primary fund.
  - 7. The Bylaws shall not deprive the Chairman of statutory authority and duties outlined in the Texas Election Code, or conflict with the Texas Election Code in any way.
- B. Vice Chairman shall:
  - 1. Preside over the Steering Committee in the absence of the Chairman.
  - 2. Assist the Chairman, as requested, in performance of the office.
  - 3. In the event of the Chairman's absence or inability to serve, serve as acting Chairman until the Chairman resumes their duties or until a new Chairman is elected.
  - 4. With the approval of the County Chairman, may publish a communique regarding party activities.
- C. Secretary shall:
  - 1. Carry out the usual duties of that office.
  - 2. Keep an up-to-date roll of the CEC members.
  - 3. Ensure that each member receives timely notices of meetings.
  - 4. Maintain a permanent file containing the minutes and meeting notes of all CEC meetings.
  - 5. In the event of a vacancy in the office of County Chairman, call a meeting of the CEC for the purpose of electing a new Chairman.
  - 6. The Secretary is authorized to receive and preserve applications for a place on the primary ballot.

7. Shall preside over CEC meetings in the absence of the Chairman and Vice Chairman, and the Steering Committee in the absence of the Chairman and Vice Chairman.
  8. At the start of each meeting, the Presiding Officer shall direct the Secretary to do a roll call to assess who is present.
  9. Maintain CEC attendance records.
- D. Treasurer shall:
1. Be responsible for keeping the financial records for the CEC, for complying with all applicable state and federal laws with regard to reporting contributions and expenditures.
  2. Prepare periodic reports of the financial condition for presentation to the CEC and the Steering Committee.
  3. The Treasurer is also on the Financial Review committee as a non-voting member.
  4. The Treasurer shall preside in the absence of the Chairman, Vice Chairman and Secretary.

## **ARTICLE V – Steering Committee**

### **Section 1. Composition and Election**

The Steering Committee shall be composed of the County Chairman, the Vice Chairman, the Secretary, the Treasurer, and four (4) Area Coordinators, and one (1) Precinct Chair elected at-large from the body.

- A. Presiding Officer: The Chairman shall preside over the Steering Committee. In his or her absence, the Vice Chairman, then the Secretary, and then the Treasurer (in the aforementioned absences) shall preside over the Steering Committee.
- B. Voting Members: The voting members of the Steering Committee shall be the Chairman, the Vice Chairman, the Secretary, the Treasurer, and the four (4) elected Area Coordinators and at-large Precinct Chair.
- C. Area Coordinators
  1. Area: The geographical boundaries of each of the four (4) County Commissioner Precincts shall determine the Area for each Precinct Chair and the Area for which the Area Coordinator is responsible.
  2. Duties:
    - i. Coordinate the Party activities within the respective area.
    - ii. Conduct periodic meetings with the Precinct Chairs within the Area Coordinator's respective area.
    - iii. Identify issues, events, need for community participation, and any other matter of concern or opportunity within the respective area.
    - iv. Report to the Steering Committee findings relevant to the respective area.
  3. Election:
    - i. The CEC Meeting Chair shall declare a recess for the purpose of allowing Precinct Chairs to caucus by their area in order to elect their Area Coordinator.
    - ii. The Area Caucus shall elect a Caucus Chair for the purpose of conducting the Area Coordinator election.
    - iii. The Caucus Chair shall conduct the election and any runoff by paper ballot.
    - iv. Election of the Area Chair requires a majority vote if there is more than one candidate.
    - v. The Caucus Chair shall report the election result to the CEC Meeting Chair and Secretary.
- D. At-Large Precinct Chair

1. Duties:
  - i. Assist Area Coordinators as needed.
  - ii. Attend the Area Meetings held by the Area Coordinators.
  - iii. Represent any Area at the Steering Committee or Area Meeting for any Area for which the respective Area Coordinator is unable to attend.
2. Election:
  - i. Nominations from the floor will be made at a CEC Meeting.
  - ii. The candidate(s) will each have three (3) minutes to speak.
  - iii. If there is more than one (1) candidate, the vote and any runoff will be by paper ballot.
  - iv. A majority vote is required.

## **Section 2. Quorum, Meetings, Voting, and Proxies**

- A. Quorum: A quorum for the Steering Committee shall consist of 40% or more of the voting members. Matters shall only be voted on in a meeting where a quorum of Steering Committee members is present. A meeting will allow any member to attend in person, by telephone conference or by an online meeting service.
- B. Meeting Minutes: The Secretary shall keep written minutes with meeting notes of all Steering Committee meetings and shall distribute the written minutes to the CEC with the call for the next scheduled CEC meeting.
- C. Proxies: No proxies are allowed for Steering Committee members (RPT Rule 6).
- D. Any Steering Committee meeting is open to the CEC or any Standing or Ad-Hoc committee member.

## **Section 3. Steering Committee Duties**

It shall be the duty of the Steering Committee to:

- A. Assume responsibility for the transaction of business necessary between meetings of the CEC and to:
  1. Prepare a biennial budget revised on an annual basis for the CEC, adjusted by the CEC with majority vote, if necessary;
  2. Submit that budget to the CEC at the next CEC meeting after the organizational meeting;
  3. Examine and recommend approval of any contract that subjects the MCRP to any liability or obligation – financial or otherwise; and
  4. Authorize expenditures in accordance with the adopted budget or an emergency and as funds are available.
  5. Recommend to the CEC whom to remove and/or whom to appoint for any of the following positions:
    - i. The Parliamentarian;
    - ii. The Sergeant at Arms;
    - iii. The Legal Counsel;
    - iv. All standing, special, and ad hoc committee chairs and
    - v. Other Officers as needed
- B. Develop the agenda for the CEC meetings, and for any CEC meeting called by the Steering Committee;
- C. Embrace all initiatives of the RPT.

- D. Work with the County Chairman to recommend to the convening authority, members of the CEC or other eligible Montgomery County voters, a list of personnel to officiate primary, runoff and general elections pertaining to the Republican Party. The Steering Committee must refrain from arbitrarily removing experienced members from being Election Judges, without due cause, primarily resulting from actionable complaints from Montgomery County Election Central and/or the Texas Secretary of State, regarding the conduct of an election.

#### **Section 4. Steering Committee Terms**

The elected Steering Committee members' terms expire concurrent with that of the CEC.

#### **Section 5. Steering Committee Meeting Calls**

Meetings may be called by the Chairman or Vice Chairman or at least three (3) members of the Steering Committee by a petition sent to the entire Steering Committee.

#### **Section 7. Steering Committee Meeting Notice**

Notice of regular Steering Committee Meetings must be at least seven (7) days before the meeting. Notice of an emergency Steering Committee Meetings must be at least two (2) days before the meeting.

Notice of all Steering Committee meetings consist of:

- Notice of date, time, location, and agenda,
- Posting on website calendar, and
- Notice emailed to CEC members and Officers, all Subcommittee Chairs and Steering Committee members.

#### **Section 8. Agenda**

Whoever has called the Steering Committee meeting shall prepare an agenda to be sent pursuant to Article V Section 6. The agenda for all Steering Committee meetings must be approved by majority vote at the beginning of each meeting. The Steering Committee may amend the agenda at the beginning of the meeting.

### **ARTICLE VI – Meetings**

#### **Section 1. Meeting Calls**

Regular and statutory meetings shall be called by the County Chairman or the Steering Committee. Special meetings of the CEC may be called by the County Chairman, with the approval of a majority of the Steering Committee. Special meetings also may be called by written petition signed by twenty percent (20%) of the total membership (not including vacancies) of the CEC delivered to the Chairman, the Steering Committee, or to the Secretary at least seven (7) days before the desired meeting date, or in the event of a stated emergency, two (2) days. The purpose and order of business of the meeting must be stated in the call for any statutory, regular, or special meeting.

### **Section 3. Meeting Notice**

Notice of regular and special meetings of the CEC shall be sent to each member of the CEC by e-mail at least seven (7) days in advance, two (2) days in advance for an emergency meeting.

Notice of meetings of standing, special or ad hoc Subcommittees shall be posted on the website and emailed to committee members at least seven (7) days in advance, one (1) day in advance for an emergency meeting.

Notice of all CEC meetings consist of:

- Notice of date, time, location, and agenda,
- Posting on website calendar, and
- Notice emailed to CEC members and Officers, all Subcommittee Chairs and Steering Committee members.

### **Section 4. Committee Report Submission**

All Subcommittee reports shall be submitted in writing prior to the CEC meeting, in accordance with Section A below.

- A. To promote informed votes, Committee Reports shall be delivered to the Secretary via email no later than three (3) days prior to the CEC meeting, and such report shall be emailed by the Secretary to all Precinct Chairs by email at least 24 hours prior to the CEC meeting.
- B. When a Committee vote is taken on any matter to be presented to the CEC, the report reflecting the will of the majority vote shall be submitted to the CEC as the Committee Majority Report. The Committee Chair will then ask if any committee member in the minority desires to write a report reflecting the minority position. If a member of the minority vote agrees, that will be submitted to the CEC as the Minority Report. Multiple Minority Reports may be presented on the same matter, but only one Majority Report per matter is allowed. Such reports may only be written by a committee member who voted in favor of that position. For a unanimous vote on a matter to be submitted to the CEC, a Report Without Opposition will be submitted.
- C. A Committee Report may not be made public until such report is approved by the CEC.
- D. When a Committee Report is made public, such report must show both the Majority and Minority Report(s), if a Minority Report is available.

### **Section 5. Quorum**

A quorum for all meetings, in which only statutory required business is conducted, shall be those members present (RPT Rule 9.b). A quorum for the conduct of non-statutory business except filling vacancies shall be twenty-five percent (25%) of the total membership of the CEC, unless otherwise noted within these Bylaws.

### **Section 6. Agenda**

The agenda for regular meetings of the CEC shall include New Business. The Presiding Officer shall respectfully give all Precinct Chairs an opportunity to present information during New Business. The Chairman or Steering Committee, whichever has called the CEC meeting, shall prepare an agenda,

and send it to the Precinct Chairs with the meeting call. The CEC may amend the agenda at the beginning of the meeting, by two-thirds ( $\frac{2}{3}$ ) vote of members present.

### **Section 7. Discussion and Debate**

Discussion or debate on any resolution or other matter of business brought before the CEC shall be limited to a total of three (3) speakers "For" and three (3) speakers "Against". (There does not need to be an equal number of "For" and "Against" speakers.) Each speaker shall be entitled to speak not more than three (3) minutes on a main motion and two (2) minutes on amending motions, provided, however, that the limitations contained in this section may be suspended by a majority vote of those members present and voting.

### **Section 8. Open to the Public**

All CEC meetings shall be open to the public. The public shall be allowed to film or record at any time from a position that is not disruptive to the meeting.

For matter(s) for which there is significant disagreement, within the CEC or community, the County Chairman will call for a closed meeting until the matter(s) are resolved, tabled, or otherwise ended for the current meeting. The County Chairman shall adjourn the meeting, and after a recess, shall reconvene a closed CEC meeting.

## **ARTICLE VII – Subcommittees**

### **Section 1. Establishing Committee Chairs & Members for Permanent Committees**

Within 30 days of passing Bylaws for the 2022-2024 biennium, the County Chairman shall call a special meeting for the purpose of nominating and electing subcommittee chairs.

For any committee chair vacancy that occurs, nominations will be from the floor of the next CEC meeting and elected by a majority of the body of those present.

A member of the respective committees above are not required to be a member of the CEC but must be a resident of Montgomery County who voted in the most recent Republican Primary or take an oath of Party Affiliation.

Membership shall be no less than three (3) members. nominated by the Subcommittee Chair and confirmed by the CEC, by majority vote of members present and voting.

### **Section 2. Subcommittee Quorum and Removal**

Subcommittee meeting quorum shall be 33% of subcommittee membership, but never no less than 3 people. Subcommittee members who have never attended the Subcommittee meeting shall not be counted when calculating a quorum. Subcommittee members who have missed 3 meetings in a row shall be automatically removed from the Subcommittee.

### **Section 3. Subcommittee Chair Responsibilities**

The Subcommittee Chair shall select the members of the subcommittee.

When members of any committee(s) are selected, the names and positions for said committee(s) shall be published on the MCRP website and sent to all CEC members no less than 14 days prior to the meeting to vote on said committee(s). It is the responsibility of the committee chair to maintain the list of members on the website.

Notice for all committee meetings shall be published on the MCRP website at least three (3) days before the scheduled meeting.

Within seven (7) days of receiving the notice, subcommittee chairs shall reach out to each person who has expressed an interest in joining their committee, whether or not a position is available, to provide feedback on their inquiry.

Each committee chair shall provide a written report, using the template provided, in electronic format no later than three (3) days prior to each CEC meeting regarding the actions of the committee since the last CEC meeting. If the committee has not conducted any actions, no report is required.

#### **Section 4. Victory 2024 Committee**

The purpose of the committee is to lead, organize, and encourage the effort to “get out the vote” for all uncensured Republican candidates in the November 2024 election. At the organizational CEC meeting, the CEC shall elect by majority vote the chair of the Victory 2024 Committee. The Victory 2024 Committee chair shall select the members of the committee.

#### **Section 5. Vacancy Committee**

The purpose of the committee is to review and recommend individuals to fill vacancies. There should be a minimum of 5 and a maximum of 15 members on this committee. The Vacancy Committee shall report vacancy recommendations to the CEC for a vote. Each vacancy is voted separately.

#### **Section 6. Rules Committee**

The Rules Committee shall consider supplemental rules that are not in conflict with the most recent Texas Election Code, Republican Party of Texas Rules, or these Bylaws.

#### **Section 7. Financial Review Committee**

The Financial Review Committee shall provide review of financial matters related to CEC funds. The Treasurer is a member of the Finance Committee.

#### **Section 8. Candidates Committee**

The subcommittee shall vet candidates and/or issues in non-partisan races. The subcommittee shall present their report to the CEC. Passage of a motion to endorse or oppose a candidate or issue in a non-partisan election shall require a majority vote of the CEC members present and voting.

#### **Section 9. Fundraising Committee**

The Fundraising subcommittee exists to raise money for the party. The subcommittee may also plan fundraising events. Any expenditures made to raise funds must be approved through normal policies and procedures established by the Party. The Treasurer is a member of the Fundraising Committee.

### **Section 10. Technology Committee**

The Technology Committee for the shall assist the party with technology to support the purposes of the party. Duties include recommending and/or maintaining the hardware, software and infrastructure for the MCRP headquarters equipment and social media applications. Training should also be provided on the use of the hardware, software and infrastructure to precinct chairs and headquarters volunteers.

### **Section 11. Marketing/PR Committee**

The purpose of the committee is to promote the efforts of the MCRP and its brand through public relations initiatives and marketing efforts, including postings via website content, the email distribution list, social media, and press releases and other sources. In addition, the Marketing/PR Committee works with other committees to maximize efforts for successful events and other community involvement activities.

### **Section 12. Headquarters Committee**

The purpose of the committee is to develop and maintain a list and schedule of volunteers to support the day-to-day operations of the Montgomery County Republican Party headquarters. Volunteers will also maintain a current and accurate on-line calendar of office use. Also, maintain a log of phone calls and visitors to the HQ, that list names, contact info and reason for call/visit. This info must be reported to the CEC in the same manner as all other committee reports

### **Section 13. Community Engagement Committee**

The purpose of the committee is to engage Republican voters in voter registration drives, sponsoring and attending other events, and community involvement activities.

### **Section 14. Training & Development Committee**

The purpose of the committee is to develop and conduct training programs and prepare training materials and resources for Precinct Chairs, election judges, clerks, poll watchers and all Republican voters. The committee is also responsible for developing a mentorship program to support new Precinct Chairs. This committee should develop subject matter experts throughout the year.

### **Section 15. Election Committee**

The purpose of the committee is to ensure that we have integrity in our elections. Also, promote Republican candidates and issues in non-primary elections (Article VII), as well as assist the County Chairman in finding judges and clerks for all local elections, including coordinating with Election Central the training for them.



## **Section 16. Legislative Priorities Committee**

The purpose of the committee is to track local elected officials' actions regarding their adherence to the Legislative Priorities and Party Platform, as well as their voting patterns. This would include going to meetings across the county, as well as to Austin, in addition to reporting to the Marketing Committee.

## **Section 17. Special or Ad Hoc Committees**

The CEC may establish and appoint such special or ad hoc committees as it deems necessary to assist in carrying out such duties not specifically assigned to a standing committee, subject to the confirmation of a majority of the CEC.

## **Section 18. Transparency**

Notice for all committee meetings shall be published on the MCRP website as soon as possible before the scheduled meeting.

# **ARTICLE VIII – Publication of Bylaws and Meeting Minutes**

A copy of the Bylaws of the CEC, as adopted by the CEC, shall be posted on the Montgomery County Republican Party website within three (3) business days of adoption. A copy of the CEC meeting minutes shall be posted on the Montgomery County Republican Party website within three business days.

# **ARTICLE IX – Paid Staff Policy**

## **Section 1. Paid Staff Member Neutrality**

Paid staff members shall remain neutral in intraparty contests for both public and Party offices.

## **Section 2. Hiring and Termination of Paid Staff**

Authority to hire or terminate all paid staff shall rest with the CEC. All employment opportunities shall be considered "At-Will". A majority vote by the CEC with at least 50% of the membership voting shall be required to hire or terminate any paid staff.

## **Section 3. Performance Review**

The Steering Committee shall review the performance of all paid staff at least annually and present a report on their findings to the CEC at least fourteen (14) days in advance of the next scheduled meeting and presented at that meeting the CEC.

# **ARTICLE X – Parliamentary Authority**

The rules contained in the most recent edition of Robert's Rules of Order shall govern the CEC in all cases in which they are applicable and in which they are not inconsistent with these Bylaws, any special rules the CEC may adopt, the rules of the Republican Party of Texas, or applicable law.

## **ARTICLE XII – Resolutions, Candidate/Issue Endorsements, Censure**

### **Section 1. Primary Ballot Endorsement (Prohibited)**

The CEC and Steering Committee, as a collective body, shall not endorse any candidate or issue on the Republican primary or primary runoff ballot. The exception to this rule is found in Section 3 of this Article. This does not preclude a Precinct Chair, or a group of chairs, from supporting, recommending, or endorsing candidates or issues. The resources of the MCRP, including the official email system, social media accounts, mailing list, etc. may not be used by any CEC member(s) to support a candidate, to promote any endorsement by any CEC member(s), or issue in the Republican primary or primary runoff.

### **Section 2. Non-Partisan Election Endorsement (Allowed)**

The CEC may endorse identifiable and uncensured Republican candidates in non-partisan races. If more than one identifiable and uncensured Republican candidate is running in a non-partisan race, they shall endorse all of the identifiable and uncensured Republican candidates or none of them. The CEC shall not choose one identifiable and uncensured Republican over another identifiable Republican in a non-partisan race. The Montgomery CEC may support or oppose any issue in a nonpartisan election when it is clearly spelled out in the current Texas GOP Platform.

### **Section 3. Censured Candidate**

The CEC may by a two-thirds ( $\frac{2}{3}$ ) vote of those present and voting, with 50% or more of the members voting, adopt a resolution censuring a Republican public or party office holder or candidate representing all or a portion of the County for not fulfilling their duties or for three (3) or more actions taken during the current biennium in opposition to the core principles of the Republican Party of Texas defined in the Preamble of the Party Platform as described in Rule 43A. Such a resolution may include that the named office holder be penalized and censured and declare that no Rule or Bylaw enacted by any division of the Party at any level that demands the CEC be neutral intraparty contests shall be observed with respect to the named candidate, and no financial or other support shall be provided to their campaign by the Party except that which is required by law. Any such penalty shall expire after the current biennium. If there is more than 1 other candidate in the race with the named candidate, all candidates other than the named candidate must be treated equally.

### **Section 4. Resolutions**

The Resolution is a formal motion, instructions, or sense of the body on important or complex questions, meeting the following requirements:

- A. Put in writing in the format of "WHEREAS," followed by pertinent facts or observations, followed by "Therefore, be it RESOLVED the Montgomery County Republican Party of Texas" followed by instructions or sense of the body.

- B. If the CEC vote on the motion to adopt a Resolution is unanimous, the "Therefore" will have the addition: Therefore, by Unanimous Vote, be it resolved...
- C. If the vote is not unanimous, the votes in the minority may provide a written Minority Report within 3 days of the passing of the Resolution. The Minority Report(s) will follow below the Resolution with the "Therefore": Therefore, by Minority Vote, be it RESOLVED...
- D. If the County Chairman concurs with the Unanimous vote, the Majority Vote, or the Minority Vote, the phrase "In Agreement with the County Chairman" may be added to the Resolution. Otherwise, but not both, the County Chairman may add "Observation(s) of the County Chairman" immediately below the Resolution and before any Minority Report, with observations as written by the County Chairman. All of this item is at the prerogative of the County Chairman:
- E. For a Resolution to be considered, all of the following must be met:
  - 1. The Resolution must be submitted in writing in an electronic format no less than three (3) business days prior to the CEC meeting;
  - 2. The quorum to consider a Resolution is 50% of the non-vacant Precinct Chairs present at the beginning of the meeting;
  - 3. In order to clearly represent the sense of the CEC, approval requires 2/3rds or more vote of those present.
- F. When available on the MCRP website, the Resolution may be promulgated by any member of the CEC.
- G. If the Resolution is published in any medium, omitting any portion or omitting any Minority Report(s) or omitting any County Chairman Observations, the County Chairman has discretion to take any steps necessary to issue or place a notification that the Resolution so published is not in fact a Resolution of the MCRP.

## **ARTICLE XIII – Website and Social Media**

### **Section 1. Website and Social Media**

The Subcommittee shall oversee the website and social media functions. All members and Officers of the CEC shall only use the official website and social media accounts for official CEC functions.

At the beginning of the biennium, all previous online presence of the CEC shall be transferred to the current CEC. Failure to do so is misconduct and subject to formal reprimand, censure, and removal from membership in the CEC, pursuant to the rules set forth in these Bylaws.

### **Section 2. Contact and Email Lists**

The CEC shall be ultimately responsible for control, maintenance and usage of the contact and email list.

## **ARTICLE XIV – Amendment of Bylaws**

### **Section 1. Proposal of Amendments**

Any member or Officer desiring to propose an amendment to these Bylaws shall submit a written copy to the Secretary not less than 21 days prior to a statutory, regular, or special meeting of the

CEC, at which meeting such proposed amendments shall be referred to the Rules Committee for its consideration. The Rules Committee shall report its recommendation to the CEC at its next statutory, regular meeting or special meeting called for the purpose of amending the rules.

## **Section 2. Notification to CEC**

All members of the CEC shall be emailed all proposed amendments within 3 days of receipt by the Secretary. All members of the CEC shall be emailed the Rules Committee report no less than 7 days prior to the scheduled meeting at which the CEC shall vote on the proposed rule changes.

## **Section 3. Adoption of Amendments**

Amendments to the Bylaws need a yeas vote of two-thirds ( $\frac{2}{3}$ ) vote of the members present when at least 50% of the members are voting at a scheduled CEC meeting.

# **ARTICLE XV – Contracts**

## **Section 1. Approval**

Any contract shall need the review of the Steering Committee before consideration and approval by the CEC.

## **Section 2. Signatory Authority**

Contracts can only be signed by the County Chairman, and/or Vice Chairman, and/or Treasurer after approval by the CEC.

## **Section 3. Duration**

No contract has any effect beyond the 20th day after the 2022 Montgomery County Republican Runoff election.

## **Section 4. Responsibility**

The signer(s) bear personal financial responsibility and other obligations for any contracts extending or having any effect beyond the 20th day after the 2022 Montgomery County Republican Runoff election.

Any executed contract on behalf of the CEC not approved by the CEC is null and void.

# **ARTICLE XVI – Online Meetings**

By majority vote of any Subcommittee, the Subcommittee may choose an online meeting format for their committee. In person and online meetings of a Subcommittee are open to all CEC members and Officers, Subcommittee members & Steering Committee members as well as those persons identified in RPT 8.g.

By majority vote of the Steering Committee, the Steering Committee may choose an online meeting format for their committee. In person and online meetings of a Steering Committee are open to all CEC members and Officers, Subcommittee chairs & Steering Committee members as well as those persons identified in RPT 8.g.

**Addendum A - Definitions - (these are not part of the Bylaws)**

The terms used throughout these Bylaws are defined as follows:

1. "Area" - A defined, geographical boundary.
2. "Area Chair" - Representatives elected in caucuses that lead and organize Republican efforts and to assist the Precinct Chairs within their respective areas of responsibility [Article XI].
3. "Caucus" - Closed meeting of a group of persons belonging to the same political party or faction usually to select candidates or to decide on policy.
4. "County Chairman" - The Presiding Officer, elected at the general primary election [Article IV, Sec. 1].
5. "County Executive Committee" and "CEC" - The Montgomery County Republican Party of Texas County Executive Committee.
6. "Elected Officer" - County Chairman, Vice Chairman, Secretary, Treasurer.
7. "Election Precinct" - A numbered political subdivision, determined by a county's commissioners court, that is compact and contiguous, based mainly on geography boundaries, population, and access to voting [TEC Title 4, Chapter 42].
8. "Precinct Chairman" - An elected (or appointed) Republican Party representative from each county election precinct [Article III].
9. "Majority Vote" means greater than 50%.
10. "Primary" - A process by which the general public can indicate their preference for a candidate in an upcoming general election or by-election, thus narrowing the field of candidates. And/or to vote on issues.
11. "Qualified Voter" – A person who is 18 years or older; a United States citizen; has not been determined to be totally or partially mentally incapacitated; not a convicted felon; is a resident of Texas and is a registered voter [TEC Title 2, Chap. 11].
12. "Primary Runoff" - An initial vote did not result in a winner because it was tied or too close to call. A runoff election settles the matter, providing a final decision.
13. "Quorum" - A minimum number of members required to be present.
14. "RPT" - Republican Party of Texas.
15. "Special" or "Ad Hoc" Committee - For a special purpose or end at hand; also, by extension, improvised or impromptu.
16. "Standing Committee" - Committee/s with a continued existence, formed to do its assigned work on an ongoing basis.
17. "TEC" – Texas Election Code.



## **Montgomery County Republican Party**

County Executive Committee Meeting Agenda

Alan Sadler Commissioner's Court

July 19, 2022 at 6:30 p.m.

1. Call to Order
2. Roll Call
3. Approval of Agenda
4. Invocation
5. Pledges
6. Oath of Office
7. Adoption of Bylaws
8. Adjournment



Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

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**Re: Notice of CEC Organizational Meeting**

1 message

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**Bryan Christ** <bryan4mcrp@gmail.com>  
To: Kristen Plaisance <kristencplaisance@gmail.com>

Thu, Jul 14, 2022 at 8:24 AM

Kristen,

They should be ready to circulate some time today. I'll message you directly just to ensure you get them when they go out.

On Wed, Jul 13, 2022 at 8:27 PM Kristen Plaisance <kristencplaisance@gmail.com> wrote:

Hey Bryan,

I never received the supplemental document you referenced in your email. Did I miss it or has it still not been sent out yet?

Kristen

On Tue, Jul 12, 2022 at 5:59 PM Bryan Christ <bryan4mcrp@gmail.com> wrote:

All Pct Chairs,

This is the official meeting call for the 2022-2024 CEC Organizational Meeting to be held on July 19th at 6:30p at the Sadler Building. Attached you will find the agenda for the meeting and the proposed bylaws. The proposed bylaws are the collective product of the 5 workshops that many of you participated in. The sharing of ideas and collaboration was wonderful!

The proposed bylaws represent one of many possibilities. **Where there was significant debate, variations have been captured in a separate doc.** This doc will be circulated soon as a set of possible amendments (which we called options) during the workshops. **We will walk through the proposed bylaws and apply these options through the amendment and voting process.**

--

Bryan Christ  
MCRP Chairman

--

Bryan Christ  
MCRP Chairman



Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

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**Proposed Amendments**

1 message

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**Bryan Christ** <bryan4mcrp@gmail.com>  
Bcc: kristencplaisance@gmail.com

Thu, Jul 14, 2022 at 5:25 PM

All,

Earlier this week I sent out a copy of the proposed bylaws we will take up for discussion and vote this coming Tuesday. The copy that I sent you was the product of an open and collaborative set of workshops conducted both digitally and in-person. I am thankful to all who participated. At times there were decisions that required far more conversation than we had time for. As a result, those "options" were captured as a set of amendments in this document. Please take the time to review it before our meeting next week.

--

Bryan Christ  
MCRP Chairman

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 **Amendments MCRP Texas Bylaws for 2022-2024.pdf**  
146K



**Bylaws of the MONTGOMERY COUNTY REPUBLICAN PARTY OF TEXAS  
COUNTY EXECUTIVE COMMITTEE 2022-2024**

*AMENDMENTS*

**ARTICLE III – Membership**

**Section 4. Filling Vacancies**

(Amendment 1)

ADD:

- E. Vacancies shall be placed and voted upon at the conclusion of meetings. Selection of new Precinct Chairs shall not to be moved up in order of agenda. New Precinct Chairs shall not vote at the meeting during which they were selected as members.

**ARTICLE IV – Officers**

**Section 1. Elected and Appointed Officers**

(Amendment 2)

REPLACE item B.2 with:

- B. Vice Chairman, Secretary, and Treasurer
  - 2. The Vice Chairman, Secretary and Treasurer shall be elected by the CEC at the biennial organization meeting.

OMIT:

- 4. The Treasurer shall be appointed/replaced by the County Chairman and presented at the CEC meeting following the appointment.
  - i. Qualifications: A professional in business accounting, such as a CPA.
  - ii. Non-voting: The Treasurer will be a non-voting member of the CEC.

**ARTICLE V – Steering Committee**

(Amendment 3)

OMIT all of:

Section 1. Composition and Election

**ADD / REPLACE with:**

**Section 1. Composition and Election**

The Steering Committee shall be composed of the County Chairman, the Vice Chairman, the Secretary, the Treasurer, and five (5) at-large Area Coordinators.

- A. Voting Members: The voting members of the Steering Committee shall be the Chairman, the Vice Chairman, the Secretary, the Treasurer, and the five (5) at-large CEC Representatives.
- B. Election of the five (5) at-large CEC Representatives.

The at-large CEC Representatives shall be nominated from the floor and elected by the CEC at the biennial organizational meeting.

1. Nominations: Nominations shall be made from the floor. After nominations have been made, the nominees shall draw numbered lots as to speaking order. The nominee drawing the number 1 shall speak first, followed by number 2, and so forth in sequential number order. Each nominee shall have a total of three (3) minutes to speak, with no time for those who wish to speak on behalf of the nominee.
2. Voting: After all nomination speeches have concluded, voting shall be conducted by secret paper ballot. The Chairman, Vice Chairman, and Secretary shall count the votes. Each nominee may have one (1) teller to witness the vote counting.
3. Ballots: Each paper ballot shall consist of up to five (5) blank lines, one for each open CEC Representative position. Each Precinct Chair present shall be entitled to receive one paper ballot. On the paper ballot, those entitled to vote may write up to five names - one name per line. The order in which the names are written on the ballot is of no consequence. A ballot may not contain the name of any nominee(s) multiple times; in such an event the name of nominee(s) shall be counted as having received only one vote per nominee on the particular paper ballot. However, if a ballot contains six or more different names, then that entire cast ballot shall be declared invalid and shall not be counted.
4. Declaring Winner: Each open position is filled in descending order of votes received, provided that the nominee so assigned has received a majority of the total votes cast.
5. Runoff: In the event that any open CEC Representative positions remain after each nominee receiving a majority of votes has been assigned a position, a runoff election shall be conducted for the nominees who did not receive a majority of votes. There shall be no additional time for speeches. A new paper ballot containing lines for the number of positions remaining to be filled shall be prepared. Each voting member present shall be entitled to receive one paper ballot. On the paper ballot, those entitled to vote may write up to one name per line. A ballot may not contain the name of any nominee(s) multiple times; if a ballot contains the name of any nominee(s) multiple times, the name(s) of nominee(s) shall be counted as having received only one vote per nominee on that particular paper ballot. If a ballot contains more different names than remaining positions, then that entire cast ballot shall be declared invalid and shall not be counted.
6. Conclusion of Voting: Each open position is filled in descending order of votes received, provided that the nominee so assigned has received a majority of the total votes cast. If necessary, the runoff process is repeated until all open EC Representative positions have been filled.
7. Voice Vote: If the number of nominees is the same or less than the number of open CEC Representative positions, then voting may be by voice vote, or the Presiding Officer may declare those nominees elected.

**ARTICLE VI – Meetings**

(Amendment 4)

**Section 6. Agenda**

OMIT:

The agenda for all CEC meetings must be approved by majority vote at the beginning of each meeting. The CEC may amend the agenda at the beginning of the meeting, by two-thirds ( $\frac{2}{3}$ ) vote of members present.

REPLACE:

“by two-thirds ( $\frac{2}{3}$ ) vote”

WITH

“by majority vote” or “three-fifths ( $\frac{3}{5}$ ) vote”

The agenda for all CEC meetings must be approved by majority vote at the beginning of each meeting. The CEC may amend the agenda at the beginning of the meeting, by \_\_\_\_\_ of members present.

(Amendment 5)

**ARTICLE XII – Resolutions, Candidate/Issue Endorsements, Censure**

REPLACE Article XII Title with:

**ARTICLE XII – Candidate/Issue Endorsements, Censure**

OMIT: All of Section 4.

**Section 4. Resolutions**



Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

## Establishment Power Hungry naked power grab of the MCRP...

1 message

**John Wertz** <lsutigah@comcast.net>  
 To: John Wertz <lsutigah@comcast.net>

Mon, Jul 18, 2022 at 2:33 PM

Dear fellow GOP Precinct Chairs;

Good afternoon!

You may have [no doubt heard](#) about fellow chair James Byer's apparent collusive and damning email attempt(attached) addressed to Chairman Christ' appointed parliamentarian Jason Millsaps(Judge Mark Keoghs COS) for tomorrow evening, while copying Chairman Christ. This corrosive and divisive email is what appears to be a scheme to hi-jack our County Executive Committee meeting tomorrow night to force their controlling agenda and bylaws down our collective throats. As Republicans, is this sort of behavior acceptable to you?!? I sure hope not!

This all goes back to RINO Commissioners and their followers, in an attempt at a naked power grab of our party apparatus. This is to also squash complaints from conservatives who've called them out before when they stray from the party rules/platform. These followers include the Christs(the chairman Bryan and his wife Kristin Nicole, as noted in the linked article, the latter of who's the political consultant for Commissioners Riley, Walker and others in the county). Doesn't that seem to be a clear conflict of interest?

And now, not only do they want to consolidate that power through their bylaw rewrite via this attempted sham, claiming collaboration when it was merely Alinskyesque Delphi technique exercises(under the guise of collaborative "workshops"), they want to go about it in an under-handed manner, that only democrats could dream up! It's despicable that so-called Republicans would resort to this underhanded tactic against fellow Republicans. If one supports this type of behavior, they either seemingly have something to gain financially or maybe they're just in the wrong party! We shouldn't and won't tolerate it!

I will take issue with part of the article linked above and some of the claims from people like Mr. Byers that the party has been dysfunctional(as a result of a few). Despite the hurdles and divisiveness from some in the party(who're always hypocritically claiming to want unity) that we've experienced over the last 2-4 years under our conservative leadership and most recent bylaws/biennium, we've had a Luau, two very successful golf tournament fundraisers(2019/2021), an office upgrade, and a GALA fundraiser honoring law enforcement that altogether grossed over \$100,000, leaving us over \$50,000 currently in the bank. Those who didn't participate in those party events and/or even leadership or on committees, chose not to.

For those who don't know, proceeds from those events are typically used for Get-Out-The-Vote Efforts(GOTV). In the 2020 GOTV, we developed a GOP slate card that went out to 85,000 households(over 120,000 voters), 25,000+ push cards and 37,000 texts the day before the election, to not only result in the highest MoCo GOP turnout ever, but increased the rate almost 10% for the 2020 over the 2016 POTUS elections in MoCo. That's results folks. And that's never been done here before! Ever!!

So if you want to get Republicans elected and defeat democrats, join us! If you want to return to the days of do-nothing, top-down autocratic leadership, then that's your prerogative.

In closing, I think Mr. Millsaps should recuse himself as the chairman appointed parliamentarian and Mr. Byers & the Chairman should consider doing the same from their respective positions, so that we can have a productive and fair meeting tomorrow evening.

Respectfully,

John Wertz

Treasurer

Montgomery County Republican Party

P.S. Mr. Byers, someone forwarded to me the attached list you developed of supposed Freedom Caucus members. This is what Democrats do. What do you and your supporters intend to do with this?

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### 2 attachments



**Byers unethical scheming 071422 email.pdf**  
1129K



**Byers MCRPTX Freedom Caucus Precinct Chairs.pdf**  
111K



**Exhibit H****Exhibit 38****Parliamentary and RPT Rules Questions for the July 19 CEC Organizational Meeting**

From: James Byers (byersjt@yahoo.com)

To: jason.millsaps@hotmail.com

Cc: bryan4mcrp@gmail.com

Date: Thursday, July 14, 2022 at 04:09 PM CDT

Jason,

Thank you for volunteering to serve as our Parliamentarian for our July 19 CEC Organizational Meeting. To get you started, let me know if you have any issues with the following approach:

Once Chairman Christ begins the meeting, we will have prayer and pledges. The Precinct Chairs will then be sworn in.

I will then rise, or will remain standing to be recognized. Chairman Christ will recognize me first. Once I have the floor, I will say:

Mr. Chairman, I am James Byers, Chair of Precinct 24. RPT Rule 8.e, reads in part, "Notice of the organizational meeting and a copy of any proposed Bylaws and/or Rules shall either be mailed via the USPS or emailed, and be posted on the county party website, if available. Delivery will be to the last known address of the members of the executive committee at least seven (7) days prior to the date of the meeting."

Mr. Chairman, all Precinct Chairs received your Official Notice at 5:59 PM July 12, 2022, which exceeded the minimum notice of 7 days. The Official Notice included one (1) set of proposed Bylaws. Those Bylaws were the result of five (5) workshops conducted over 2 months, to which all Precinct Chairs were invited.

Mr. Chairman, I now MOVE that we adopt those same Bylaws, a copy of which we all received. With your permission, Mr. Chairman, in the spirit of the cooperative efforts of the Workshops, I now ask my colleague and Precinct Chair \_\_\_\_\_ to present the Amendments to the proposed Bylaws, which amendments are for the sections of the proposed Bylaws for which there were alternate proposals.

Chairman Christ: "The Chair recognizes Mr. \_\_\_\_\_."

Note: the blank lines will be a volunteer, whom I will prep Saturday. Whoever volunteers will not be able to speak against the amendments.

Precinct Chair \_\_\_\_\_: Mr. Chairman, I am \_\_\_\_\_, Chair of Precinct ?? I MOVE that we adopt the five (5) amendments. You have a written copy. Thank you."

*(See Robert's Rule 27:11 "A series of amendments to a pending main motion may be offered in one motion.")*

Precinct 24 Chair Byers: "Mr. Chairman, I call for Division of the Question. If you will permit, we can examine the sixteen Articles of the Proposed Bylaws and consider each of the five Amendments in that order, as well as any other amendments."

*(see Robert's Rule 27:11 "... any member may demand a separate vote on one or more of them.", no second, no vote)*

At this point, it is likely that someone will stand and Move to Substitute in Whole, using a set of proposed bylaws that were emailed by Precinct Chair John Wertz at 6:02 PM July 12, 2022. If this is done, I will object.

Precinct 24 Chair Byers: "Point of Order. Mr. Chairman, Robert's Rule 12:69 reads in part, "... A substitute offered for a main motion .. is a primary amendment and can therefore be moved only when no other amendment is pending." *Cannot be overruled*

We will then proceed through the amendments.

Once all of the amendments have been resolved, prior to the final vote on the Bylaws, a Precinct Chair might Move to Substitute in Whole, using the Bylaws emailed by John Wertz.



**Exhibit 38**

If such a Move to Substitute is made, I will have three (3) different points of order:

Precinct 24 Chair Byers: Mr. Chairman, I have three (3) Points of Order. **First Point of Order:**  
The email sent by Precinct John Wertz was signed by "Montgomery County Republican Party Freedom Caucus Precinct Chairs". Mr. Chairman, is there any official Party affiliation with any group named the "Montgomery County Republican Party Freedom Caucus Precinct Chairs"?

Chairman Christ: No, Mr. Byers, there is no such group in affiliation with the Republican Party at any level.

Precinct 24 Chair Byers: Then, Mr. Chairman, such an unaffiliated group has no standing to submit any proposals, Bylaws or otherwise, to this Body of the Republican Party, and so is OUT OF ORDER.

Chairman Christ shall rule.

Precinct 24 Chair Byers: Mr. Chairman, my **2nd Point of Order.**

As was read earlier, RPT Rule 8.e requires: "Notice of the organizational meeting and a copy of any proposed Bylaws and/or Rules shall either be mailed via the USPS or emailed, and be posted on the county party website, if available. Delivery will be to the last known address of the members of the executive committee at least seven (7) days prior to the date of the meeting."

Mr. Chairman, since RPT Rule 8.e requires that "a copy of ANY proposed Bylaws" will be sent with your official Notice, did you receive a 2nd or more copies of proposed Bylaws for you to include in your Official Notice?

Chairman Christ: Mr. Byers, I did not receive a 2nd set of proposed Bylaws to include in my Official Notice. Nor was I asked to post such a 2nd set on the website, at any time prior to the 7 Day notice requirement.

Precinct 24 Chair Byers: Mr. Chairman, the Move to Substitute violates RPT Rule 8.e and cannot be considered at this meeting, and so is OUT OF ORDER.

Chairman Christ shall rule.

Precinct 24 Chair Byers: Mr. Chairman, my **3rd Point of Order.**

The Bylaws of the so-called "Montgomery County Republican Party Freedom Caucus Precinct Chairs" These issues have already been heard.

*Robert's Rule 38:1. Renewal of motions is limited by the basic principle that an assembly cannot be asked to decide the same, or substantially the same, question twice during one session...*

The Move to Substitute would require us to decide the same questions twice, and so is OUT OF ORDER.

Chairman Christ shall rule.

If any of the above Orders are supported by the Parliamentarian and Chairman, then that takes us back to the Main Motion as amended, or not amended, for a final vote. Regardless of this final vote, the meeting can end. The Officers and Committee Chairs can be elected at a special session later.

Let me know if you have any concerns. Enjoy your weekend vacation. Go easy on the casino - not!

James Byers

MCRP Texas, Precinct 24 Chair

(281) 300-0058



Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

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## The Next Two Years for the Republican Party - A New Direction

1 message

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**James Byers** <byersjt@yahoo.com>  
To: Bryan CHRIST <bryan4mcrp@gmail.com>

Mon, Jul 18, 2022 at 6:12 PM

Our Organizational CEC Meeting is important and is required by our Republican Party of Texas (RPT) Rules. For our Organizational Meeting, the RPT Rules require that our Proposed Bylaws be distributed in a specific manner and within a specific timeframe. The RPT Rules also require that we strictly follow Robert's Rules (12th Edition) while conducting our meeting. It all has to be done correctly to be legitimate. That's why we have a Parliamentarian.

As Precinct Chairs, we each have a right to speak to our Parliamentarian, before, during, or after our meeting. Rather than take up time during the meeting, I laid out my understanding of the issues I foresee, and the RPT Rules and Robert's Rules that are relevant. As is my right, I then asked our Parliamentarian for his assessment. Presently, I do not know what will be his ruling. But at least, our Parliamentarian will be prepared.

I saw a note from Precinct 69 Chair Wertz. It looked like another rant, so I did not bother reading past the first sentence. I'm in an article for the Golden Hammer? Sweet!

**So I ask**, do we want a repeat of the previous two (2) years, with endless backbiting and personal attacks? Of course not.

I suggest a new direction, one of civility, probity, and mutual respect for all our meetings.

At the meeting tomorrow night, you will be pleasantly surprised to see that each amendment to the Proposed Bylaws will be presented, debated, and submitted for a vote. I expect no one to get everything they want. As President Trump would say, we don't need to compromise, but we will have to negotiate.

We each need to be on our best behavior, as befitting an elected official of the Republican Party. Our country needs us to be. I look forward to seeing you all.

James Byers  
MCRP Texas, Precinct 24 Chair  
10204 Forest Glade Court, Conroe, TX 77385  
(281) 300-0058





Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

## Tonight's meeting

1 message

**Kristen Plaisance** <kristencplaisance@gmail.com>

Tue, Jul 19, 2022 at 8:35 AM

To: Bryan Christ &lt;bryan4mcrp@gmail.com&gt;

Good morning Bryan,

I am trying my best to dodge all the mud being slung back and forth between Wertz and Byers but it is impossible to completely ignore. I am not a member of the Freedom Caucus although I have been asked to join and I was not asked to be a member of Byers Independent Alliance. I have never been one to follow a crowd. I prefer to look at all sides and make my own assessments of what I think is going on. That being said, I would like to address a couple of concerns that I have and give you an opportunity to address them.

In the email Byers handed out at his private meeting, and shared by Wertz in another email, it appeared that Byers' plan is to attempt a smash down of the bylaws you sent out and that the only amendments that will be allowed to be considered are the ones on your amendment list you sent out. This is concerning to me because this is contrary to what you stated in our workshops. In more than one of the workshops you stated that it was your intention to include all of the possible amendments so that the entire CEC body could vote on them. There are items missing from your amendment list. For example, on the bylaws you sent, under article III section 4 item C, this was a provision where it was virtually unanimously expressed that people did not want this item. It is still in the bylaws and there is no amendment to discuss it or change it. Also, under article IV section 1 item A 2 there was a lot of discussion as to what exactly "ex officio" meant. Does that make you a voting member or a non voting member of every committee? This was never answered nor spelled out in the meetings. I have looked up the term and the history of the word and it gives no indication as to the answer to my question. The CEC members have a right to know the answer to that question and to decide if that is what they want, or not. There is no provision in your amendments to discuss or vote on this. In article VI section 8 second paragraph, I believe I missed the meeting where this section was discussed but I would like an opportunity to debate this. I understand the premise behind it but I believe the people have a right to see their government in action. The good, the bad and the ugly. When there is significant disagreement I think it's important for the people to see all of the arguments for why we voted for or against something. This helps the people to know if their representatives are aligned with their values and wishes. I also think that if the people saw how some of these people act, maybe they wouldn't vote for them again. Anyway, there is no provision in your amendments to debate this item either.

I understand that we do not want to redebate every item and have another meeting that lasts until 4am and at the same time there needs to be an opportunity for members to address things they feel strongly about.

Second, I will say that the email that Byers handed out at his private meeting does not look good. I read Byers last email where he claims that the email was just him informing the parliamentarian of his understanding of the issues and asking for his assessment. I fundamentally reject this lie for what it is. That email looks, feels and smells like collusion. It does not look good for you and it does not look good for Jason Millsaps. I will also add that when Byers sent out his first email something jumped out to me that caused me concern. In that email he stated that HE had verified that Wertz's email was correct in the BCC list. How did Byers verify Wertz's email address in a Blind Carbon Copy list unless you had shown him the email including the BCC list? Did Byers lie or did you instruct Byers to send out that email denouncing the Freedom Caucus? I tried to dismiss it at the time but with this new email it is harder to ignore. Bryan, I am calling on you to be a stronger man than this. To be a better man than this. When I first became a precinct chair your wife called me and asked me not to listen to others when they said bad things about you or her. She praised you and talked about what a good man you are. I assured her that I would not listen to anyone else and that I would make up my own mind about who each of you are. I am watching, I am seeing. I am calling on you to show me something better. Be a man of your word and do not attempt a smash down of these bylaws with only limited, manipulated debate. Let us have true debate about the bylaws so that we can have something that is representative of the body as a whole.

I will also strongly suggest that for appearances sake that you and Jason Millsaps both publicly denounce the email that Byers handed out and that Millsaps respectfully recuse himself from this meeting. I like Jason, and at the same time, for this meeting, he would be seen as the fruit of a poisoned vine. It would be hard for him to officiate over this meeting fairly and properly because if he says something in favor of Byers, or you, everyone will look at that with suspicion. He knows this, which might make him overcompensate and make an unfair judgment against Byers or you for fear of being seen as favoring one of you. He is in a no win situation if he officiates this meeting.

Thank you for your time and consideration of this matter.

Respectfully,  
Kristen Plaisance

**Exhibit 38**



Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

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**README - Organizational Meeting Tonight**

1 message

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**Bryan Christ** <bryan4mcrp@gmail.com>  
Bcc: kristencplaisance@gmail.com

Tue, Jul 19, 2022 at 10:51 AM

All,

I am aware of an allegation that I intend to conduct the meeting in such a way as to stifle debate and the amendment process. I want each of you to know that will not be the case. I assured the workshop participants that other options and amendments will be heard. I will be keeping my word and I will be holding feet to the fire for those who plan to go back on theirs. **I will address this in greater detail this evening.**

There are also a couple of allegations about the workshop bylaws that must be addressed.

1. The workshop bylaws do permit the MCRPTX to endorse in non-partisan races. This is very much untrue as can be seen in [Article XII, Section 2](#). It is my personal opinion that we should make sure all non-partisan races have Republican candidates and support from the MCRPTX.
2. The 2020 bylaws took the power away from Pct Chairs to establish committees and determine who the chair of the committees are. The workshop bylaws restore this right of you, the Pct Chair, to make that decision.

--

Bryan Christ  
MCRP Chairman



Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

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**Re: README - Organizational Meeting Tonight**

1 message

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**Kristen Plaisance** <kristencplaisance@gmail.com>  
To: Bryan Christ <bryan4mcrp@gmail.com>

Tue, Jul 19, 2022 at 11:23 AM

Well done Bryan. Thank you for addressing this and being a man of your word. I owe you an apology, it seems that in my own fears, I made assumptions about your intentions that I should not have made and placed them in an email. I should have addressed my concerns without jumping to conclusions and I apologize for those assumptions. Thank you for calling me this morning and clarifying things with me.

Kristen

On Tue, Jul 19, 2022 at 10:51 AM Bryan Christ <[bryan4mcrp@gmail.com](mailto:bryan4mcrp@gmail.com)> wrote:  
All,

I am aware of an allegation that I intend to conduct the meeting in such a way as to stifle debate and the amendment process. I want each of you to know that will not be the case. I assured the workshop participants that other options and amendments will be heard. I will be keeping my word and I will be holding feet to the fire for those who plan to go back on theirs. **I will address this in greater detail this evening.**

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2. The 2020 bylaws took the power away from Pct Chairs to establish committees and determine who the chair of the committees are. The workshop bylaws restore this right of you, the Pct Chair, to make that decision.

--

Bryan Christ  
MCRP Chairman



Exhibit M

Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

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**Re: Petition to Sign Notice - Call for Emergency Meeting for the CEC**

1 message

---

**Kristen Plaisance** <kristencplaisance@gmail.com>

Wed, Jul 20, 2022 at 8:40 PM

To: Robert Walker &lt;rw4mocotx@outlook.com&gt;

You have my permission to use my signature

Kristen Plaisance  
Plaisance Photography  
713-724-0474  
[www.PlaisancePhotography.com](http://www.PlaisancePhotography.com)

On Jul 20, 2022, at 7:33 PM, Robert Walker <[rw4mocotx@outlook.com](mailto:rw4mocotx@outlook.com)> wrote:

Precinct Chair,  
I would am petitioning your signature on Call for Emergency Meeting of the CEC for the following purpose.

The stated emergency is that we must reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment.

Please respond as soon as possible with authorization for signature on the meeting call.

Thank you,

Robert Walker  
Precinct 87 Chair  
832-341-2917  
[rw4mocotx@outlook.com](mailto:rw4mocotx@outlook.com)



Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

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**Fwd: Call for Emergency Meeting for the CEC - Saturday, July 23 @ 9am**

1 message

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**Bryan Christ** <bryan4mcrp@gmail.com>  
Bcc: kristencplaisance@gmail.com

Thu, Jul 21, 2022 at 3:38 PM

Precinct Chairs of the Montgomery County Republican Party County Executive Committee:

The following call has been issued in accordance with Article VI Section 2 of the enacted bylaws. Pursuant to the stated emergency clause thereof, Robert Walker has satisfied the (2) day requirement. Pursuant to RPT Rule 8j, I declare a stated emergency and electronic means of participation is hereby permitted in accordance thereof.

----- Forwarded message -----

From: **Robert Walker** <[rw4mocotx@outlook.com](mailto:rw4mocotx@outlook.com)>  
Date: Thu, Jul 21, 2022 at 8:55 AM  
Subject: Call for Emergency Meeting for the CEC - Saturday, July 23 @ 9am  
To: Bryan Christ <[bryan4mcrp@gmail.com](mailto:bryan4mcrp@gmail.com)>  
Cc: Raquel Lewis <[raquel-lewis@outlook.com](mailto:raquel-lewis@outlook.com)>

Mr. Chairman, Madam Secretary, and Precinct Chairmen

Pursuant to Article VI Section 2 of the bylaws, an emergency meeting has been called by Robert Walker and the undersigned Precinct Chairs.

The stated emergency is that we must reconvene to complete the continuation of business on the approved agenda from the 2022 Org Meeting on Tuesday, July 19th (6:30pm) that was not completed due to improper adjournment.

Please see the attached document with the agenda as well as the precinct chairs who have called for this meeting.

Robert Walker  
Precinct 87 Chair  
832-341-2917  
[rw4mocotx@outlook.com](mailto:rw4mocotx@outlook.com)

--

Bryan Christ  
MCRP Chairman

**NOTICE OF CALL OF EMERGENCY SPECIAL MEETING.pdf**

138K



Kristen Plaisance &lt;kristencplaisance@gmail.com&gt;

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**Fwd: Call for Emergency CEC meeting - Online**

1 message

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**Bryan Christ** <bryan4mcrp@gmail.com>  
Bcc: kristencplaisance@gmail.com

Thu, Jul 21, 2022 at 4:47 PM

Precinct Chairs of the Montgomery County Republican Party County Executive Committee:

The following call has been issued in accordance with Article VI Section 2 of the enacted bylaws. Pursuant to the stated emergency clause thereof, James Byers has satisfied the (2) day requirement. Pursuant to RPT Rule 8j, I declare a stated emergency and electronic means of participation is hereby permitted in accordance thereof.

----- Forwarded message -----

From: **James Byers** <byersjt@yahoo.com>  
Date: Thu, Jul 21, 2022 at 4:36 PM  
Subject: Call for Emergency CEC meeting - Online  
To: Bryan CHRIST <bryan4mcrp@gmail.com>

Pursuant to the Bylaws of the MONTGOMERY COUNTY REPUBLICAN PARTY OF TEXAS, **ARTICLE VI – Meetings, Section 2. Meeting Calls**

We, the undersigned MCRP Precinct Chairs (see attached Notice), call by written petition by more than 20% of the executive committee's total membership (not including vacancies). The stated emergency is our County Executive Committee's continued noncompliance with our biennium Bylaws for 2022-2024. The purpose of this meeting is to bring our Executive Committee in compliance with our Bylaws.

Time: 09:00 AM. July 23, 2022

Place: Online and optionally, TWFG Insurance Offices, [1201 Lake Woodlands Dr., Suite 4020, The Woodlands, TX 77380](#)

The agenda and signatories are attached.

[James Byers](#)  
(281) 300-0058

--

Bryan Christ  
MCRP Chairman

**NOTICE OF CALL OF EMERGENCY SPECIAL MEETING.07.23.22.pdf**

79K

**DECLARATION OF FREDERICK SUNDERMAN**

My name is Frederick Sunderman; my date of birth is [REDACTED]. My address is [REDACTED]. I declare under penalty of perjury that the following statements are true and correct:

1. I reside in Montgomery County, TX and voted in the 2022 Republican Primary.
2. I have been personally present at events concerning a division of the Montgomery County Republican Party Executive Committee ("CEC"), and write this declaration in support of legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC's orderly participation in county elections, as I am aware that Bryan Christ, the elected Montgomery County Republican Party Chair, has attempted to disrupt CEC meetings, has not accurately been recognizing properly seated chairs or managing the CEC's resources, such as the space leased by the Montgomery County Republican party, its bank account, and its website.
3. I hold the positions of Republican Precinct Chair 88 in Montgomery County, having obtained that seat as indicated below by the checked paragraph:  
  

☒ **ELECTED AND NOT DISPUTED** - I was elected to the office of Precinct Chair during the 2022 Republican Primary and to my knowledge, no one contests my election or position as a duly elected Precinct Chair and member of the CEC.
4. I've been a precinct chair in the party since 2008. Coming from a family steeped in military tradition, including my father Captain Fred Sunderman who retired from the United States Army Civil Service after 25 years of service, I felt compelled in 2008 to give back through volunteering by engaging with the local GOP.
5. I got engaged in county politics to help clean up the corruption I'd heard about, including our own party and to help elect republicans that believe in the Texas Republican Platform and party discipline to office.
6. Bryan Christ is the current chair who was elected in a Texas open primary system, meaning Democrats can cross over to vote for liberal vs. conservative candidates. Before that election, I attended almost all meetings and never once do I remember seeing Mr. Christ at any CEC meetings, until he put his name on the ballot. It should be noted that Christ's wife Kristin is a paid political consultant, normally representing the establishment/elite in the county, which most would consider a conflict of interest with Mr. Christ being in the party chair position.



Please find below some of the many issues with Chairman Bryan Christ that I've witnessed over the last 4-1/2 years:

7. His right-hand spokesperson, James Byers, started much of the existing contentiousness leading up to this biennium's organization meeting with what appeared to be a collusion email dated 7/14/22, designed to high-jack the 7/19/22 formation meeting with the parliamentarian. Two weeks prior to that, an amended agenda was sent to Chairman Christ which he failed to circulate and post in accordance with RPT Rule 8e.
8. At that 7/19/22 meeting, after adopting (47-31 vote of those chairs present) the conservative's amended agenda, the chairman and Mr. Byers embarked on a deleterious campaign to confuse and frustrate the majority of the body by attempting to change the title of the agenda. At the end of the 3-hour-plus meeting, I "called for an adjournment so that the two sides could work on differences and the chair could bring them back together again". I stand by my recorded request. Instead of articulating the adjournment to the body, nor responding to three audible calls for a division (violating RONR 21:12), the Chairman Christ took a quick vote and claimed the majority had the necessary votes to adjourn even though the adopted agenda also indicated adjournment could not occur until the agenda was completed (RONR 21:3). At the time of the adjournment other members of my precinct were present and I felt that my leaving the meeting in its current state would not serve the republicans that had elected me. It can be over an hour trip back and forth to Conroe in person meetings. The time was after 9pm. My intent was to adjourn the meeting to restart during a convenient meeting time either another evening or a Saturday. Our younger precinct chairs have families and careers. I had a proposal due the next day at 1 pm. I trusted that both sides would reconvene with agenda issues resolved per the votes conducted on 7/19. This never happened. I left the meeting after I was informed there would not be a reconvening that night and I waited for a statement from Mr. Christ as to a date and time of the continuance of the meeting. This statement was never received.
9. Since the July 19, 2023 was considered to be in recess and the Chairman refused to send out the meeting call to complete the agenda, many of the 47 conservative chairs that made up the majority on 7/19, properly called another meeting on 7/23/22 (within the 45-day RPT Rule 8e requirement) to reconvene (finish) the 7/19/22 meeting. Chairman Christ also called a competing meeting for the same time and place (against (RONR 8:2.1). He then showed up, trying to conduct a vote before the meeting even started. This was out-of-order so Robert Walker, John Wertz and the majority of the C.E.C. members in attendance objected. The chairman then refused repeated attempts to conduct Walkers' meeting based on the 7/19 adopted agenda (TEC 171.022) and was subsequently removed by a majority of the body using RONR 62.09 & 62.10. He then left the meeting thus abandoning the chair. In accordance with Robert's Rules, the body then elected SD4 SREC Dale Inman to chair the meeting and complete the Organizational Meeting Agenda. And since this was still a formation meeting, a quorum was established by those present and voting. The agenda was completed and the C.E.C. elected our officers,

remainder of the steering committee, Vacancy chair (Allison Winter) and John Wertz as Victory Chair.

10. Chairman Christ then began calling duplicate meetings from then on, further attempting to divide the party and creating absences of conservatives at his illegitimate meetings. He even called one illegitimate online meeting (7/25/22) that was totally out-of-order, due to lack of proper credentials, notification, participation, changing roll calls, and inconsistent vote tallies.
11. Christ was responsible for a statutory required failure to report multiple (16) precinct chairs to Secretary of State(SOS) from the 5/24/22 election, as well as 13 others that were seated thereafter on 7/23/22 and 8/13/22 (TEC 172.118), potentially hindering our November GOTV effort. He has yet to report four who were appointed at the 1/3/23 meeting. And he's not properly announcing or reporting positions to the SOS that come open.
12. During one of our properly called meetings (8/13/22), the CEC majority voted to remove Chairman Christ from the bank account in fear that he would remove the CEC's funds and hinder the party's get out the vote efforts. This action to remove Christ was codified (p. 13b of the minutes) with a Resolution to remove Chairman Christ from the account and add Vice Chair Jon Bouche, Treasurer Charles Shirley, and to keep John Wertz (Asst. Treasurer) to the account. This motion passed with 47 yes votes; 2 no votes and 2 abstains (in a roll call vote). Since that time, Chairman Christ and James Byers have publicly defamed the three people assigned to that bank account as chosen and voted on by the CEC by claiming in a newsletter dated 1/17/22 that Bouche, Shirley and Wertz embezzled funds from the bank by committing fraud in the process.
13. James Byers had also called a meeting competing with and after ours (approved by Chairman Christ) on 8/13/22, but they did not have the proper number of chairs {20% (only 19 of 98 occupied chairs) for calling the meeting which makes that meeting invalid. At that illegitimate meeting, they purportedly elected officers, and filled some committee chairs. Subsequently, the majority of the C.E.C. asserts that all meetings after and as a result of Christ's invalid meeting on 8/13 are also invalid.
14. Our 125+ page RPT Rule 8m calling for mediation resulted in a conference on 9/30/22, which was conducted by RPT Chair Matt Rinaldi and SREC Officials Committee's Chair Matt Patrick. Mr. Patrick's after-action report as approved by Chairman Rinaldi was damning to both Chairman Christ and Mr. Byers as to their unwillingness to work towards a resolution of our differences.
15. Since that time, other than Dec. 6th, Chairman Christ has been ignoring our properly called meetings, in which we have conducted party business and appointed chairs to vacant positions. At the 10/4/22 meeting, the Victory Committee which had been authorized by the CEC had ordered and paid approximately \$15,500 for 20,000 GOP push cards for distribution in our GOTV (Get Out the Vote Campaign), which is one of our primary party charges. Not only did neither Chairman Christ nor any of

his followers attend the meeting, they also refused to pick up their allotment of push cards which meant that several precincts containing hundreds of voters each weren't contacted. Later in his 1/17 newsletter, Christ implied that those funds that were authorized and spent for GOTV just disappeared. It should also be mentioned that CEC funds are used to pay for HQ Rent and a legacy copier (\$260/mo. For 5 years) that Christ's mentor left us when he didn't refile to run again and all of this is accounted for in the T.E.C. reports submitted by the elected Treasurer Charles Shirley.

16. At the illegitimate follow-up meetings scheduled by his illegitimate steering committee (stemming from his illegitimate 8/13/22 meeting), Chairman Christ continued to lead out-of-order meetings where his favored precinct chairs were appointed, often into positions that were not vacant, thus sowing much more confusion and division within the party.
17. In his 1/17/23 newsletter, the Chairman also lied and claimed that the headquarters rent had NOT been paid.
18. I am aware that dueling sets of precinct chairmen will cause difficulties as an election and conventions draws near. Additionally, precinct chair lists are public information (see section 172.029(b) of the Texas Election Code). I am aware that candidates depend on these lists.
19. Additionally, precinct conventions are historically run by precinct chairs or their agents and allies. If this matter is not resolved, we may well have competing claims and disputes about which precinct convention held for a precinct is valid, going into a district and the state convention.
20. There is so much more that Chairman Christ and James Byers have done to further sow confusion and separate the party (which includes violating statutory duties to report the proper precinct chairs, to violating RPT rules our bylaws and RONR), that would fill up 125+ pages here like the RPT Rule 8m mediation request that was filed in August 15, 2022.
21. As was indicated in the mediation recap, Chairman Christ and his spokesperson are not honorable people and should resign from our party.
22. I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on February 13, 2023.

signed:   
Frederick S Sunderman

**DECLARATION**

(TEX. CIV. PRAC. &amp; REM. CODE § 132.001)

My name is Doug Taylor and my date of birth is [REDACTED] and my address is [REDACTED]  
[REDACTED] and I declare under penalty of perjury that the following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary.
2. I have been personally present at events concerning a division of the Montgomery County Republican Party Executive Committee ("CEC"), and write this declaration in support of legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC's orderly participation in county elections, as I am aware that Bryan Christ, the elected Montgomery County Republican Party Chair, is not accurately recognizing properly seated chairs or managing the CEC's resources, such as the space leased by the Montgomery County Republican party, its bank account, and its website.
3. I hold the position of Republican Precinct Chair 5 in Montgomery County, having obtained that seat as indicated below by the checked paragraph:

☐ ELECTED AND NOT DISPUTED - I was elected to the office of Precinct Chair during the 2022 Republican Primary and to my knowledge, no one contests my election or position as a duly elected Precinct Chair and member of the CEC.

☒ APPOINTED AND NOT DISPUTED - I was appointed to the office of Precinct Chair on January 11, 2022 after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. To my knowledge, no one has challenged my position and all members of the CEC accept my appointment.

☐ APPOINTED BUT DISPUTED - I was appointed to the office of Precinct Chair on \_\_\_\_\_, after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. I am aware that Bryan Christ has claimed to have appointed someone else to this position or otherwise asserts that my claim to this position is not valid.

4. I have also seen a call for a specially called meeting on August 13, 2022, issued by Christ. According to Art. VI, Section 2 of the [CEC's 2020 Bylaws](#), special meetings



must have a list of precinct chairs who are supporting that call which equals 20% of the total membership (not including vacancies). He did not reach that threshold.

5. I have been a long-time activist in the Republican Party. I am aware that dueling sets of precinct chairmen will cause difficulties as the election draws near. Additionally, precinct chair lists are public information (see section 172.029(5)b of the Texas Election Code). I am aware that candidates depend on these lists.

6. Additionally, precinct conventions are historically run by precinct chairs or their agents and allies. If this matter is not resolved, we may well have competing claims and disputes about which precinct convention held for a precinct is valid.

7. During the July 19th meeting when voting on the amended agenda prior to the vote Mr. Byers “calls for division” (44 minutes and 6 seconds [in the video](#)). After deliberation with the parliamentarian, the chairman ruled that it was division of the question (44 minutes and 40 seconds [in the video](#)) and therefore every point on the agenda must be voted on separately. The call for division was clearly a call for the division of the assembly (vote), not division of the question. The Chairman made decisions to be dilatory and to unnecessarily extend the meeting in an effort to frustrate the process.

8. The amended agenda, by the conservative majority, for the July 19th meeting was approved (47 for to 31 against, at the [1hr 19min mark of the video](#)). The last item on the agenda was that the meeting will “adjourn at the completion of the agenda”(RONR 21:3). Mr. Fred Sunderman motioned for an adjournment (meaning a recess) “until the two sides can work it out”. The chairman got a second and it quickly went to a voice vote without the chairman articulating the motion to adjourn.

9. Upon saying we were adjourned, at least two precinct chairs asked for division of the vote. The chairman ignored them(violating RONR 21:12). The voice vote was questionable if even it made a majority, much less 2/3rds that he claims. In this instance it would have required a 2/3 vote to amend the adopted agenda (adjournment (RONR 41:63)).

10. In the 7/23 reconvening Organizational meeting, the chairman wanted to vote on a “preferred” agenda (of two) prior to the start of the meeting. This was out of order since the conservative (amended) agenda had been adopted on July 19, 2022 (see No. 10 above). After this meeting was started the chairman refused to chair the reconvened meeting ([TEC 171.022\(a\)1](#)) - subsequently the body removed him via RONR 62:10.

11. Statutory required failure to report multiple (16) precinct chairs on time to Secretary of State from the 5/24/22 election, as well as 13 others that were seated thereafter on 7/23/22 and 8/13/22 ([TEC 172.118](#)), potentially hindering our November GOTV effort.

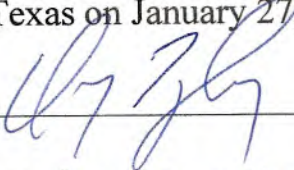


12. Statutory required failure to report resigned precinct chair (72 - Ann Kate) and allowing her to participate in voting and counting her in calls for special meetings.
13. Purposely scheduling dual meetings 3 times, on top of already properly noticed meetings, at same date & time, assuring conflict, confusion & division (especially amongst new chairs), dividing everyone's loyalties, time and effort (RONR 8:2.1).
14. Improperly noticed online meetings by his precinct chairs (should be the chairman - [RPT rule 8J](#)).
15. Neither proper credentials nor instructions were included (7/25/22 & 9/1/22) and meetings were rigged to control the outcome in disallowing open participation by muting everyone's mic, nor providing properly required transparent business protocol or simultaneous documentation during zoom meeting ([RPT Rule 8j](#) and RONR 9:36). Also, on 7/25 he refused to accept some motions. In addition, he kept members in the waiting room (8/31), not allowing participation in the zoom meeting. His failure to send to the CEC the meeting minutes and post to the website in accordance with bylaws has caused confusion by not having the record of the business that occurred and to be taken up at (future) meetings.
16. He's prevented conservative leadership access to HQ and to the website, stifling GOTV.
17. Aside from the challenges of disputed precinct chair lists, Christ is refusing to allow access to CEC resources and meeting space and claiming to fill precinct chair vacancies through a committee of his 30+ supporting precinct chairs, which is not close to a majority of the CEC; all these appointments appear to be invalid to me.
18. As I have watched the division in the CEC, it appears that about one-third of the precinct chairs support Christ, and two-thirds are opposed to his leadership actions. The result of his lack of leadership and support means that none of his meetings can appoint a person to a vacant precinct chair, as such votes require a one-third quorum of the CEC. His divisive approach resulted in a RPT Rule M complaint signed by a majority of the CEC on August 15, 2022, along with a vote of no confidence on January 3, 2023.

Executed in Montgomery County, State of Texas on January 27, 2023.

signed: \_\_\_\_\_

printed name: \_\_\_\_\_

  
DOUG TAYLOR

## DECLARATION OF PATRICK A. TEICH

My name is **Patrick A. Teich**; my date of birth is [REDACTED] My address is [REDACTED] I declare under penalty of perjury that the following statements are true and correct.

1. I reside in Montgomery County, TX and voted in the 2022 Republican Primary Election. I have been personally present at an event concerning a division of the Montgomery County Republican Party Executive Committee (“CEC”), and write this declaration in support of legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC’s orderly participation in county elections, as I am aware that Bryan Christ, the elected Montgomery County Republican Party Chair, has attempted to disrupt CEC meetings, has not accurately been recognizing properly seated chairs or managing the CEC’s resources, such as the space leased by the Montgomery County Republican Party, its bank account, and its website.
2. I hold the position of Republican Precinct Chair 111 in Montgomery County, which I obtained by an appointment on August 13, 2022 and ratification on 09-06-2022, by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. I am aware that Bryan Christ has claimed to have appointed someone else to this position and disputes that my claim to this position.
3. Though I was appointed properly to precinct 111, I am aware that **Bryan Christ has refused to recognize my appointment, and has not** submitted my name to the Secretary Of State of Texas. Among my activities as a precinct chair, I have performed the following tasks:

08-11-2022 Thu 7:00p CEC interview meeting (hour)  
 08-13-2022 Sat attended CEC meeting - appointed Precinct Chair #111 (hours)  
 09-03-2022 Sat bought laptop for data, communication and Zoom access \$1149.99+  
 09-06-2022 Tue attended CEC meeting at 6:30p - ratified as Precinct Chair #111 (hours)  
 10-01-2022 Sat Precinct Support Training (hours)  
 10-04-2022 Tue 6:30p attended CEC meeting;  
 10-13-2022 Thu Willis – Election Day Clerk Training 8:00a – 12:00p (hours)  
 10-20-2022 Thu left push card for a neighbor of Homer Oatis  
 10-20 Thu / 21 Fri / 22 Sat -2022 made in person contacts of 58 people (hours)  
 10-28 Fri / 29 Sat / 30 Sun / 31 Mon -2022 made in person contacts of 109 people (hours)  
**I walked virtually every street in Precinct # 111.**  
 11-08-2022 Tue Election Day – at the poll from 6:15a to 10:00p (15.75 hours)

**I have had additional experiences and comments that I would like to convey, including:**

12-06-2022 Tue 6:30p Special CEC meeting – **Bryan Christ** was there but did not meet him. There was tension in the air. Then it started bad. The CEC secretary was calling roll and at the same time **Bryan Christ**'s chosen secretary started calling roll. This is December 6<sup>th</sup>. First time since August 16<sup>th</sup> when I was appointed that I saw Mr. Christ. I had attended all meetings, attended training and workshops and worked the election. He came across as arrogant and disrespectful.

12-14-2022 Wed - received email from Dale Fessenden (# 17, my mentor) that Bryan Christ and his cabal still considered Pct #111 vacant and had chosen a Stanley Oatis as 'their' Precinct Chair. I know he (Mr. Oatis) was never informed that the CEC majority had appointed me back on 08-13-2022 and confirmed that Bryan

Christ never reported me to the SOS as required.

12-17-2022 Sat - went to see if Homer Oatis knew Stanley Oatis since I had been to his place, maybe it was a relative. Homer was a little surprised to see me. His name is Homer Stanley Oatis. When I asked him what was going on, he was as confused as I was. He knew something 'not right' was up. He was not interested in doing what he had seen me do(blockwalking). He was told that he did not need to do anything and they would contact him to vote by text or maybe email. He did not have to go to any meetings and if that was necessary, someone could go for him. He was contacted on Sunday, 12-11-2022 by a woman, possibly Barbara 'Bobbi' Bodenhamer or Becky Vance and asked if he would be precinct chair for # 111. Becky Vance or Bodenhamer sent a text on Tuesday 12-13-2022 that said he was elected and another text of congratulations. I have screen shots of Homer's phone and asked him if he would help me or others at a later time possibly with exposing the way Christ / Vance / Bodenhamer handled the procedure of making him Precinct Chair. He said yes. I believe he will help in any way to explain their procedure and do what is right.

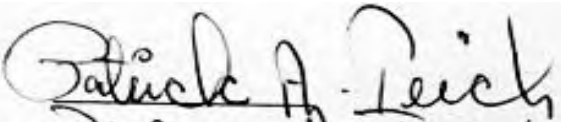
01-03-2023 Tue 6:30p CEC Meeting (**Gwen Withrow** filing a legal suit)

I talk about corruption and **Suzanne Rappatoni** got me to stop talking and do something. I am engaged in this county's politics to help clean up the corruption I've lived with but was too busy making a living and raising kids. Cleaning up DC starts with cleaning up Montgomery County and getting good conservatives elected to office.

These dueling sets of meetings, officers and precinct chairs engineered by Christ need to be stopped, because difficulties are damaging the next election right now.

I have employed **Warren V. Norred** of Norred Law, PLLC to resolve the CEC division and have contributed funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on January 24, 2023,

Signed:   
 Printed Name: PATRICK A. TEICH  
 01-24-2023  
 p. 454



**DECLARATION OF DENNIS TIBBS**

My name is Dennis Tibbs; my date of birth is [REDACTED] and my address is [REDACTED]  
[REDACTED] I declare under penalty of perjury that the following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary, during which I was elected to the office of Precinct Chair for Precinct 76. No one contests my election and member of the CEC.
2. My name was not submitted to the Texas Secretary of State until June 23, 2022 (more than 20 days after the Republican party canvassed the election and a full 54 days after the actual election). I believe that Chairman Christ's delay of promptly report precinct chairs is a violation of section 172.118 of the Texas Election Code.
3. I have been personally present at events concerning a division of the Montgomery County Republican Party Executive Committee ("CEC"), and write this declaration in support of necessary legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC's orderly participation in county elections, as I am aware that Bryan Christ, the elected Montgomery County Republican Party Chair, is not accurately recognizing properly seated chairs or managing the CEC's resources, such as the space leased by the Montgomery County Republican party, its bank account, and its website.
4. On July 16, 2022 I learned of the 7/14 email from Precinct 24 Chairman James Byers to Chairman Bryan Christ. This email outlined an orchestrated conspiracy to illegally control the July 19 CEC meeting by literally "scheduling" the recognition of Precinct Chair Byers to the exclusion of other precinct chairs with different opinions. Had that ploy not been discovered, many precinct chairs and their constituents would have been disenfranchised.
5. I was in attendance at the July 19, 2022 Organizational Meeting. At that meeting the CEC adopted an amended agenda that required completion of all items on the agenda before the meeting could be adjourned. After several contentious hours, Precinct 88 Chairman Fred Sunderman moved for an adjournment until the interested parties could schedule another meeting to complete the Organizational Meeting. Chairman Christ arbitrarily declared the motion "passed" and the meeting "adjourned" despite numerous and vocal calls for Division and Appeal.

6. I was in attendance at the July 23, 2022 continuation of the Organizational Meeting. Despite the fact that the amended agenda had been adopted at the July 19 meeting Chairman Christ openly attempted to manipulate the meeting to use some different agenda. Chairman Christ was repeatedly asked to Chair the first called meeting. He could simply have accepted the gavel and proceeded with the meeting. Instead, he attempted to call the meeting “at ease” and “invalid” and he eventually abandoned the chair. The remainder of this meeting was very peaceful and successful and our officers and precinct chairs were elected as required.

7. On July 30, 2022 at 8:52 am I, as Precinct 76 Chairman, called for an Emergency Meeting for 9 am on August 13, 2022 (Tibbs meeting). I have attached a true copy of that meeting call, which was signed by 27 members as Exhibit 1. Chairman Christ did forward the notice to all precinct chairs at 9:47 pm on July 30, 2022. He also forwarded a notice of a conflicting CEC meeting called by Precinct 24 Chairman James Byers.

8. The Byers meeting call was a half-day later, and included the names of only 19 signatories. As I understand our bylaws, Byers failed to meet the minimum threshold requirement of the required 20% of the precinct chairs, and thus not effective to call a meeting (MCRP Bylaws Art. VI, Sect. 2).

9. At the meeting that my call initiated for August 13, 2022, we met quorum with an attendance of 49 precinct chairs, which was enough to conduct business with ease, irrespective of whether we counted the improper chairs added by Christ.

10. On September 8, 2022 Chairman Christ claimed, in an email that I have attached as Exhibit 2, that there were 13 precinct chair vacancies, as well as other officer vacancies, that had not been filled because of his “challenge” in meeting the quorum threshold. In fact, all precinct chair vacancies had been filled at the 8/13/22 CEC meeting and all 111 precincts had a chairman that had been elected in the Republican primary or elected by the majority of the CEC. I believe that this is another violation of section 172.118 of the Texas Election Code.

11. Chairman Christ or his illegitimate Steering Committee (appointed at their illegitimate 8/13/22 meeting) has called for multiple meetings claiming required precinct chairs and claiming to have a quorum for such meetings. The claimed quorum is based on his appointment of “allies” to positions that are already occupied! The actions of these meetings and positions filled at these meeting are not valid because those voting are not legitimate precinct chairs.

12. I am long-time activist in the Republican Party and have served as Precinct 76 Chairman, Precinct 76 Convention Chairman and served as Montgomery County SD 7 Convention Chairman. I believe that dueling sets of precinct chairmen will cause great difficulties for future Precinct Conventions, Senatorial Conventions and State Conventions. This will also lead to confusion for candidates and their campaigns as precinct chair lists are public information (see section 172.029(b) of the Texas Election Code).

13. As I have watched the division in the CEC, it appears that about one-third of the precinct chairs support Christ, and two-thirds are opposed to his leadership actions. The result of his lack of support means that none of his meetings can appoint a person to a vacant precinct chair, as such votes require a one-third quorum of the CEC. His divisive approach resulted in a complaint signed by a majority of the CEC in late 2022, along with a vote of no confidence.

14. I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on February 7, 2023,



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Dennis Tibbs

From: Dennis <[dwtibbs@aol.com](mailto:dwtibbs@aol.com)>  
To: [bryan4mcrp@gmail.com](mailto:bryan4mcrp@gmail.com) <[bryan4mcrp@gmail.com](mailto:bryan4mcrp@gmail.com)>  
Cc: [kearnest@fisherarnold.com](mailto:kearnest@fisherarnold.com) <[kearnest@fisherarnold.com](mailto:kearnest@fisherarnold.com)>; [quentin.smith27783@gmail.com](mailto:quentin.smith27783@gmail.com) <[quentin.smith27783@gmail.com](mailto:quentin.smith27783@gmail.com)>; [dj@fikeling.com](mailto:dj@fikeling.com) <[dj@fikeling.com](mailto:dj@fikeling.com)>; [jon.bouche@cbunited.com](mailto:jon.bouche@cbunited.com) <[jon.bouche@cbunited.com](mailto:jon.bouche@cbunited.com)>; [slearnes@me.com](mailto:slearnes@me.com) <[slearnes@me.com](mailto:slearnes@me.com)>; [robert.walker@highstacks.net](mailto:robert.walker@highstacks.net) <[robert.walker@highstacks.net](mailto:robert.walker@highstacks.net)>; [gmhyde@gmail.com](mailto:gmhyde@gmail.com) <[gmhyde@gmail.com](mailto:gmhyde@gmail.com)>; [dj@fikeling.com](mailto:dj@fikeling.com) <[dj@fikeling.com](mailto:dj@fikeling.com)>; [charles.r.shirley@aidancapital.com](mailto:charles.r.shirley@aidancapital.com) <[charles.r.shirley@aidancapital.com](mailto:charles.r.shirley@aidancapital.com)>

Sent: Sat, Jul 30, 2022 8:52 am

Subject: Call for Special Meeting of the CEC, Saturday August 13 @ 9am

Mr. Chairman, Madam Secretary, and Precinct Chairmen,

Pursuant to Article VI Sections 2 and 3 of the bylaws, a special meeting has been called by myself, Dennis Tibbs and the undersigned Precinct Chairs.

The purpose of this call is to continue organizing our party in lieu of the upcoming election.

Please see the attached document with the agenda as well as the precinct chairs who have called for this meeting.

Respectfully,

Dennis Tibbs

MCRP Precinct Chair 76

-----Original Message-----

From: Bryan Christ <[bryan4mcrp@gmail.com](mailto:bryan4mcrp@gmail.com)>

Sent: Thu, Sep 8, 2022 8:41 am

Subject: MCRP State of Affairs

Precinct Chairs,

As the prospect of RPT mediation approaches, I want to thank everyone who has been diligently pressing forward since the Organizational Meeting which brought with it a reenacting of the 2020-2022 Bylaws. Despite some of its shortcomings we've made good progress in establishing an operational framework which will be needed for GOTV efforts and the November election. As a result, I want to share with you where we stand.

### **Precinct Chairs**

Due to a busy summer schedule, it's been a challenge to meet the quorum threshold required to fill vacancies. That leaves us with 13 outstanding vacancies but I'm optimistic we will be able to move forward soon.

### **Steering Committee**

With a higher threshold required for Officer confirmations, the Steering Committee still lacks a permanent Vice Chair, Secretary, and Treasurer. However, we have been able to fill the 5 at-large positions (EC Representatives). The current roster for the Steering Committee is as follows:

Chair – Bryan Christ

Vice Chair – Vacant

Treasurer – Vacant

Secretary – Vacant

EC Rep 1 – Scott Baker

EC Rep 2 – Judi Thomas

EC Rep 3 – James Byers

EC Rep 4 – Jamie Metts

EC Rep 5 – Becky Vance

While we do not have permanent officers for Vice Chair, Treasurer, and Secretary, the functions that they serve were not something that could remain neglected. For this reason we have established temporary stewards for these functions with a similar title until such a time that we can fill the permanent officer positions.

Vice Chair Pro Tem – Raquel Lewis

Treasurer Pro Tem – Darlene Kurtz

**Standing and Ad-hoc Committees**

Many critical Standing and Ad-hoc committees now have confirmed chairs. If you would like to participate on one of these committees, or know someone in the community that would like to participate, please reach out directly to the chair.

Vacancy Committee – Becky Vance  
Fundraising Committee – Susan Johnson  
Legislative Priorities – James Byers  
Financial Review Committee – Mark Frank  
Community Outreach Committee – Annette Kerr  
Victory Committee – Laurie Clifton  
Technology Committee – Scott Baker  
Rules Committee – James Byers  
Conduct and Ethics Committee – James Byers  
Headquarters Committee – Dorothy Woodall  
Marketing/PR Committee – Raquel Lewis

**Precinct Executive Committees**

While not under the jurisdiction of the County Executive Committee, five Precinct Executive Committees (PEC) have been established to ensure good communication within smaller, more manageable regions. Pursuant to TEC 171.071, each PEC was called to order according to Constable/JP district and the agenda included the election of a permanent chair as required by the statute. The PECs operate independently from the County Executive Committee and the chairs were elected by Precinct Chairs within their JP district. The roster of PEC Chairs are as follows:

PEC JP1 – Scott Baker  
PEC JP2 – Judi Thomas  
PEC JP3 – Robert Walker  
PEC JP4 – Jamie Metts  
PEC JP5 – Becky Vance

Based on the reports I have received from each of the PEC Chairs, all districts except JP3 have met twice to discuss regional GOTV efforts. As these activities take shape I will be communicating them internally and to constituents of Montgomery County.

-  
Bryan Christ  
MCRP Chairman

**DECLARATION OF ALLISON WINTER**

My name is Allison Winter; my date of birth is [REDACTED]; and my address is [REDACTED]. I declare under penalty of perjury that the following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary. I hold the position of Republican Precinct Chair 59 in Montgomery County, having obtained that seat during the 2022 Republican Primary. I have been Precinct Chair 59 for Montgomery County Republican Party (MCRP) for approximately 10 years and served as the Senate District 4 State Republican Executive Committeewoman for the Republican Party of Texas from 2018-2020. My biggest commitment has been to MCRP serving as the Vacancy Chairman the last two biennium (2018-2020 & 2020-2022) recruiting strong conservatives to fill precinct chair vacancies while implementing new processes and procedures with the goal of abiding by our bylaws which were not being adhered to.

Timeline & Account of Events of meetings:

2. On July 19, 2022, concerning the Organizational Meeting. After 3 ½ hours ([7.19.22 OM video<sup>11</sup>](#)), the only business conducted was the adoption of the substituted agenda (47-31 at 1:27:00). The agenda was not followed to completion as listed on the adopted agenda which stated in item 11: “Adjourn at the completion of this agenda.” RONR 47:7(11). The newly elected chairs were not sworn in.

3. James Byers (Pct. 24) planned collusion with Bryan Christ and his parliamentarian Jason Millsaps, as described in the email thread between them, faithfully copied below. They worked in conjunction with one another throughout the evening when Chairman Christ and Byers became aware that they did not have the majority. (See July 19th video 1:27:05, where Chairman Christ encourages amendments to the adopted agenda.) Mr. Byers and his allies made dilatory motions with the aid of Christ to prevent the meeting from progressing (see July 19th video at 1:35:03; RONR 39:1-4). Threats of our adopted agenda ending up in court was brought up by Chairman Christ to intimidate members and cause concern. (July 19th video at 2:30:30 minute- Christ). I moved to amend the adopted agenda, but he never addressed my motion. (July 19<sup>th</sup> 2:21:01 mark)

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<sup>11</sup> “7.19.22 OM video” refers to the video taken and publicly posted at <https://www.youtube.com/watch?v=zBMEzhblycA>. I have watched this video and attest to its authenticity as of February January 29, 2023. It reflects what actually occurred at the Organizational Meeting. I am referencing specific points in the video.

4. Byer's July 14, 2022 collusion email is copied below. In discussions with Byers and Christ about this email, neither have denied that it is accurate:

7/16/22, 4:36 PM (128 unread) - byersjt@yahoo.com - Yahoo Mail

**Parliamentary and RPT Rules Questions for the July 19 CEC Organizational Meeting**

From: James Byers (byersjt@yahoo.com)  
 To: jason.millsaps@hotmail.com  
 Cc: bryan4mcrp@gmail.com  
 Date: Thursday, July 14, 2022 at 04:09 PM CDT

Jason,

Thank you for volunteering to serve as our Parliamentarian for our July 19 CEC Organizational Meeting. To get you started, let me know if you have any issues with the following approach:

Once Chairman Christ begins the meeting, we will have prayer and pledges. The Precinct Chairs will then be sworn in. I will then rise, or will remain standing to be recognized. Chairman Christ will recognize me first. Once I have the floor, I will say:

Mr. Chairman, I am James Byers, Chair of Precinct 24. RPT Rule 8.e, reads in part, "Notice of the organizational meeting and a copy of any proposed Bylaws and/or Rules shall either be mailed via the USPS or emailed, and be posted on the county party website, if available. Delivery will be to the last known address of the members of the executive committee at least seven (7) days prior to the date of the meeting."

Mr. Chairman, all Precinct Chairs received your Official Notice at 5:59 PM July 12, 2022, which exceeded the minimum notice of 7 days. The Official Notice included one (1) set of proposed Bylaws. Those Bylaws were the result of five (5) workshops conducted over 2 months, to which all Precinct Chairs were invited.

Mr. Chairman, I now MOVE that we adopt those same Bylaws, a copy of which we all received. With your permission, Mr. Chairman, in the spirit of the cooperative efforts of the Workshops, I now ask my colleague and Precinct Chair \_\_\_\_\_ to present the Amendments to the proposed Bylaws, which amendments are for the sections of the proposed Bylaws for which there were alternate proposals.

Chairman Christ: "The Chair recognizes Mr. \_\_\_\_\_."

Note: the blank lines will be a volunteer, whom I will prep Saturday. Whoever volunteers will not be able to speak against the amendments.

Precinct Chair \_\_\_\_\_: Mr. Chairman, I am \_\_\_\_\_, Chair of Precinct ?? I MOVE that we adopt the five (5) amendments. You have a written copy. Thank you."  
*(See Robert's Rule 27:11 "A series of amendments to a pending main motion may be offered in one motion.")*

Precinct 24 Chair Byers: "Mr. Chairman, I call for Division of the Question. If you will permit, we can examine the sixteen Articles of the Proposed Bylaws and consider each of the five Amendments in that order, as well as any other amendments."  
*(see Robert's Rule 27:11 "... any member may demand a separate vote on one or more of them.", no second, no vote)*

At this point, it is likely that someone will stand and Move to Substitute in Whole, using a set of proposed bylaws that were emailed by Precinct Chair John Wertz at 6:02 PM July 12, 2022. If this is done, I will object.

Precinct 24 Chair Byers: "Point of Order. Mr. Chairman, Robert's Rule 12:69 reads in part, "... A substitute offered for a main motion .. is a primary amendment and can therefore be moved only when no other amendment is pending." *Cannot be overruled*

We will then proceed through the amendments.

Once all of the amendments have been resolved, prior to the final vote on the Bylaws, a Precinct Chair might Move to Substitute in Whole, using the Bylaws emailed by John Wertz.

[https://mail.yahoo.com/d/folders/2/messages/AEEXgAp1hYhQYICGAg06uH8cjAM?guce\\_referrer=aHR0cHM6Ly9tYWlsLnIhaG9vLnNvbS8&guce\\_refe...](https://mail.yahoo.com/d/folders/2/messages/AEEXgAp1hYhQYICGAg06uH8cjAM?guce_referrer=aHR0cHM6Ly9tYWlsLnIhaG9vLnNvbS8&guce_refe...) 1/2



5. I was re-elected as Vacancy Chairman at the July 23, 2022 Emergency Meeting by 40.82% of the total body. As Vacancy Chair, I take my position seriously and feel a weight on my shoulders to bring the qualified people to fill vacancies. My committee of 15 have spent a great deal of time recruiting, vetting, and interviewing qualified candidates to fill the vacancies to recommend to the CEC for appointment.

July 23, 2022 Emergency Meeting:

6. 40 Precinct Chairs called a CEC meeting on July 23<sup>rd</sup> at 9am at TWFG offices which CEC members of the Freedom Caucus secured. The agenda was to finish the business of the Organizational Meeting which was adjourned incorrectly and the agenda was not completed as stated in the adopted agenda. The call was sent to Chairman Christ at 8:55am on July 21 to be in compliance with the prescribed 48-hour notice in our bylaws for a Special Emergency meeting. Later that day, James Byers also sent a call to the Chairman for a CEC Special ZOOM meeting with the option of meeting in-person at the same time, same place at the location we secured (TWFG). Our bylaws do not prescribe online meetings except for sub-committee and Steering Committee meetings. (Article XVI MCRP bylaws). I personally contacted at least three people from their caucus to urge them to come in person as our bylaws do not allow Zoom CEC meetings. They said they had been assured that it was perfectly permissible. Those three CEC members blindly trusted Bryan Christ and Byers that Zoom voting was acceptable. When we assembled, Chairman Christ wanted to take an “unofficial vote” before he meeting commenced to decide which agenda to follow that day (2:25 video minute mark, [7.23.22 Reconvened OM](#)). That is when havoc ensued. The Chairman would not call the meeting to order for the properly noticed meeting called by Robert Walker (with signatories of 40 Precinct Chairs). At about 1:30:18, Christ walked out, along with his supporters. After his supporters left, we still had 40 members present. A majority of 40 Precinct Chairs remained. We elected a temporary chair, Dale Inman (Pct 27 chair and SREC Committeeman), to conduct the business specified in the agenda. All business was conducted in a timely, efficient manner. We adopted the 2022 Bylaws, elected officers, the five Steering Committee members, and chairs for the Victory and Vacancy Committees. I was elected the Vacancy Chairman on 7/23/22.

7. During the vote to adopt bylaws, I and two other (Precinct Chair 61 and Precinct Chair 71) missed that particular vote because we were out of the room at the time the voting began, However, we were present for all other votes including election of officers and appointments for precinct chairmen.

8. Six people were appointed by the CEC on July 23, 2022 (see list below of July 23<sup>rd</sup> appointees) by 40 elected chairs present (40.82% of the total CEC body). Five had served last biennium. Gwen Withrow, our SREC Committeewoman SD-4 was appointed to fill Pct 72 which was vacated by Martha Ann Kate. Ann Kate sent a formal resignation dated June 7, 2022 to Secretary, Raquel Lewis, Chairman Bryan Christ, myself- Allison Winter, the Vacancy Chairman and Gwen Withrow. As prescribed in our bylaws, a resignation must give written notice to the secretary (Article III, Section 6.1) is effective immediately upon receipt (Article III, Section 6.3). Ann Kate had also talked to me prior to that to let me know she desired to resign and had already talked with Gwen Withrow about taking her place which Gwen agreed to. Additionally, she recommended Gwen as her replacement in her resignation email. The CEC officially accepted Ann Kate's resignation and desire to have Gwen succeed her. RONR 47:57.

### Precinct chair resignation

Inbox

Ann Kate <annkate43@gmail.com>

Tue, Jun 7,  
11:06 AM

to Bryan, Raquel, me, Gwen

Please accept my resignation as Precinct 72 chairman. After 8 years as chairman I feel it is time for me to let someone else be in charge of my wonderful, heavily Republican, precinct. I hope to become involved in something other than politics, but will continue to support the Republican Party in other ways.

I would like to recommend Gwen Withrow to replace me as chairman of precinct 72. Gwen and her husband recently moved to Bentwater, in Precinct 72, but she has been active in Republican politics for many years and in many capacities. She is currently the SD4 SREC representative.

Good luck to the CEC in the coming two years. I hope some real work will get done for the Party.

Ann Kate  
Pct. 72 Chairman

9. The six new appointments were emailed on July 23 to Chairman Christ to be reflected on our website and also to upload as required by TEC to the Secretary of State. Chairman Christ has refused to recognize these appointed chairs to date and has deliberately not submitted their names to the SOS which is a violation of his

statutory duties. Chairman Christ has since uploaded other people's names for all of these positions listed below (with the exception of Pct 98) which is a violation of the law (violation: TEC 172.029). Three other names were uploaded around September 11, 2022 and the others were around December 1, 2022. I submitted a FOIA inquiry on January 18, 2023 to the SOS (still awaiting results) to document all changes made to the SOS since May 24, 2022.

These individuals were appointed on July 23, 2022:

<b>PCT</b>	<b>NAME</b>	<b>OCCUPATION</b>	<b>ADDRESS</b>
<b>72</b>	<b>GWEN WITHROW</b>	RETIRED CFO	54 Brookgreen Circle North, Montgomery, TX 77356
<b>92</b>	<b>MARA WASAR</b>	RETIRED	2815 Legends Crest Drive, Spring, TX 77386
<b>94</b>	<b>MARY LEWIS</b>	SALES	200 Kellington Dr, #17204
<b>98</b>	<b>STEPHANIE COX</b>	INVESTOR RELATIONS/ADMIN ASST	51 Trilling Bird Pl, Conroe, TX 77384
<b>103</b>	<b>THOMAS BARTLEY</b>	COMMERCIAL FLEET SALES DIRECTOR	2803 Lockridge Place Dr, Spring, TX 77386
<b>104</b>	<b>DIANE CAMPBELL</b>	RETIRED TEACHER	14137 Emory Peak Ct., Conroe, TX 77384

July 25, 2022 CEC Zoom Meeting:

10. A CEC Zoom meeting called for July 25<sup>th</sup> by Becky Vance and a group of Precinct Chairs. At that meeting, the chairman silenced everyone's mics. They accepted at least some of our newly appointed Precinct Chairs into the meeting & called their names during roll call. The meeting was extremely frustrating and people were not being counted present that were physically there where many of us gathered at the HQ, people were left in the waiting room, some couldn't connect with their devices, members were kicked off, motions were ignored or denied. We had votes on motions for adjournment resulting in inaccurate votes counts. When we questioned the vote totals, the numbers kept changing. We then realized they were taking out the newly appointed chairs votes even though they had called their names

during roll call and swore them in that evening. The zoom meeting protocol as specified in RPT 8.J. was not followed as we were not able to view the results in real time to ascertain that each persons' vote was counted. Additionally, the Chairman did not secure a Parliamentarian that evening which was discovered towards the end of the evening. Finally, the Chairman suddenly announced the meeting was adjourned after 4 hours and twenty minutes with nothing being accomplished.

August 13, 2022 (CEC- Freedom Caucus Precinct Chairs)

11. At the Special CEC meeting called by Dennis Tibbs, Precinct 76 on August 13<sup>th</sup>, the Vacancy Committee recommended & the CEC appointed 8 people to fill the vacancies of their respective precincts. We had a quorum of 45 chairs (43.69% of the entire body) to conduct appointments (33.33% required, Article III, 4.A.). I promptly sent these appointments on August 14<sup>th</sup> to both Chairman Christ and Secretary, Staci Earnest. I also sent the names of the July 23<sup>rd</sup> appointees again as Chairman Christ never acknowledged them. Christ has refused to recognize all of our appointments which is a violation of his statutory duties. Chairman Christ deliberately uploaded other names to the SOS 11/30/22 (violation: TEC 172.029) and later (with the exception of Pct 107) which is a violation of the law. All of our 111 Precinct Chair positions were filled at that time, leaving no vacancies.

<b>PCT</b>	<b>NAME</b>	<b>DATE APPOINTED</b>	<b>OCCUPATION</b>	<b>ADDRESS</b>
<b>26</b>	<b>CALEB SMITH</b>	8/13/22	MAINTENANCE DIRECTOR	17328 SYCAMORE TRAIL, CONROE, TX 77302
<b>54</b>	<b>BOBBI BODENHAMER</b>	8/13/22	DIRECTOR OF OPERATIONS	20130 ROADWAY, NEW CANEY, TX 77357
<b>62</b>	<b>JENNIFER BOWLING</b>	8/13/22	DOMESTIC ENGINEER	2 GREY FINCH CT, THE WOODLANDS, TX 77381
<b>80</b>	<b>STEVEN FOSTER</b>	8/13/22	SALES REPRESENTATIVE	31007 KINGSWAY PARK LANE, SPRING, TX 77386
<b>95</b>	<b>SHERRY TAVEL</b>	8/13/22	ATTORNEY	27105 CROWN CHASE DR, NEW CANEY, TX 77357
<b>101</b>	<b>STEPHANIE SCHWANTES</b>	8/13/22	HOMEMAKER	150 CEZANNE WOODS PLACE, THE WOODLANDS, TX 77382
<b>107</b>	<b>JACKIE WILLIAMS</b>	8/13/22	RETIRED	33222 KATY LEE LN, MAGNOLIA, TX 77354
<b>111</b>	<b>PATRICK TEICH</b>	8/13/22	SEMI-RETIRED	11184 DAMICO LANE, CONROE, TX 77306

August 13, 2022 Meeting (Independence Alliance Caucus Chairs)

12. Again, they called a meeting for the same date & time on August 13 but this time different location. Again, it was petitioned after our meeting call...they merely mirrored our meeting rather than meeting together, causing confusion and division. The Chairman recognized both as properly called meetings which does not comply with RONR 8:2(1).

13. At their August 13<sup>th</sup> meeting, they failed to obtain 20% of the CEC members signatures so it was an improperly called and noticed meeting. Additionally, they lacked a quorum to elect officers or appoint chairs. They “elected” a Steering Committee which were not elected in accordance with the bylaws. “Nominations shall be made from the floor” (Article V, Sec 1., A.,2.). The nominations as documented by their meeting minutes and the video of it, were by Bryan Christ, who claimed he was the only Steering Committee member so therefore he could appoint. The Steering Committee does not exist until it has properly elected members. Our bylaws also specify that a committee can be no less than three people (MCRP 2020 Bylaws Article VII, Section 15). None of the business conducted that day was legitimate that day as the meeting was not called with the proper threshold of members and was incorrectly noticed. Additionally, these positions had already been filled on 7/23/22 TWFG meeting called by Robert Walker.

September 6, 2022 CEC Meeting (called by the Precinct Group Steering Comm.):

14. At our called September 6, 2022 meeting at TWFG, no vacancies existed at that time. At that meeting, in an effort to unify the party, we voted to abide by the 2020 Bylaws. We then meticulously went back through all of our elected party positions as well as reconfirmed each of the appointed chairs. Each one was individually reconfirmed to be in total compliance with the 2020 Bylaws.

15. September 6, 2022 Special Meeting (called by the Christ Group Steering Comm.):

16. At the September 6th meeting, 29 members were present and when Christ announced they had a quorum, he announced 30 by simply adding himself. They did not have a quorum (40%) to elect officers or a quorum to appoint Precinct Chairs (33.33%). James Byers presented bylaw changes that he authored as the sole Rules Committee member (he admitted that night that he was the Chair and only member of that committee) which is a violation of minimum size is three on a committee (MCRP bylaws Article VII, Section 15). His amendments included a change to our bylaws to 25% to elect officers, remove that paper ballot votes are needed and

replace with “secret ballot” so as to modernize the party to be able to vote on positions online. Byers moved to allow CEC meetings to be either in-person and by zoom so that “everyone” can participate by invoking RPT Rule 8.J. (which is intended for declared emergencies). I believe that he was admitting that our bylaws do not permit online CEC meetings.

17. After their September 6th meeting, since they were unable to appoint new Precinct Chairs for lack of quorum required (if openings existed), the Christ Group resorted to invoke RPT Rule 7.c. to appoint chairs by online voting. With email voting, they have attempted to appoint 12 new chairs on top of chairs we had already appointed. An additional appointment was Pct 54 who was already appointed on August 13, 2022 by us but they appointed her again on December 17, 2022.

October 4, 2022 CEC Meeting (called by CEC Steering Committee)

18. Srini Katta, Pct 56 resigned on 9/20/22 to Chairman Christ, James Byers, Vice-Chairman Jon Bouche, and Asst. Treasurer, John Wertz. This resignation was forwarded to me and sent to our Secretary, Staci Earnest, and is copied below:

**From:** Srini Katta <[skatta@iserviceglobe.com](mailto:skatta@iserviceglobe.com)>  
**Date:** September 20, 2022 at 11:44:26 AM CDT  
**To:** Bryan Christ <[bryan4mcrp@gmail.com](mailto:bryan4mcrp@gmail.com)>, Jon P Bouche <[jon.bouche@cbunited.com](mailto:jon.bouche@cbunited.com)>  
**Cc:** John Wertz <[lsutigah@comcast.net](mailto:lsutigah@comcast.net)>, James Byers <[byersjt@yahoo.com](mailto:byersjt@yahoo.com)> **Subject:** Resignation from Precinct 56 chair

To the Montgomery County Republican Party Chair

I became the Chair of Precinct 56 in hopes of creating a political power that will serve the needs of the people of Montgomery County. I envisioned a county where RPT serves the interests of its constituents. Unfortunately, this was not the case, and I can no longer stand by and watch helplessly. Freedom Caucus conceded to follow the 2020-22 biennium bylaws which were contentious since the first CEC meeting. I am not sure why Chairman is not calling one combined CEC meeting to fill the positions that both Freedom and Independent caucuses are claiming to be filled by a majority of the CEC vote and put the competing executive committees to rest.

Instead, I get hit with a barrage of emails from both the caucuses with accusations and counter-accusations while both the caucuses claim that work is being done on the ground. Imagine the quality and impact of the work on the ground if both the caucuses work together!

I continue to work at the state and national level for the republican party and it was so unfortunate my goal of doing good work in the county that I live in is thrashed by the infighting in the party.

Please accept my resignation with immediate effect. Thank you all

Srini Katta  
 56 Precinct Chair.

PS: Signed resignation letter is attached to the email.

Regards, Srinu Katta

19. We recognized that Katta officially resigned as it was quite clear in his email of his intent. Christ never ensured that the resignation was posted. Nor did Christ update the Secretary of State to remove Mr. Katta's name.

20. Jim Doyle was appointed to fill the vacancy of Precinct 56 on October 4, 2022 by 41.81% (46 chairs) of the total body of 110 chairs. Jim Doyle's appointment was sent to Chairman Christ on October 6, 2022 to update the website and the SOS which is required by law.

21. Bryan Christ refused to recognize the appointment of Jim Doyle and did not upload to the SOS. The Christ Group later appointed Keith Lincoln on November 30, 2022 (almost two months later) by an email vote. Keith Lincoln's name was fraudulently uploaded to the SOS, a violation of TEC 172.029.

22. After October 4<sup>th</sup>, we developed and launched a new party website, Mctxgop.org as we were denied access to post meetings, minutes, vacancies, etc. to the existing website since July 2022.

December 5, 2022 CEC Meeting (called by Christ Group's Steering Comm.):

23. On Dec 5<sup>th</sup>, Chairman Christ held a Party put on himself (not by MCRP). A CEC Meeting was called by their incorrectly elected "Steering Committee" at the conclusion of the party. No sign-in sheets were attached to their minutes to document the purported quorum. They "appointed 4 new chairs" that evening which were quick swaps of names for vacancies never posted. There was no previous notification on their website or SOS that these precincts had been vacated.

December 6, 2022 Special and CEC Meeting (called by the Precinct Group):

24. We scheduled a special meeting and immediately following a CEC meeting for Dec 6<sup>th</sup> at TWFG location. As always, all CEC members are invited to attend. Chairman Christ came with a handful of people purporting that Mark Alan Frank was the Secretary. Mayhem ensued as Staci Earnest is the elected Secretary for the CEC. Mark Frank proceeded to call roll (most of their people who were on Zoom) at the same time as Staci. It was very chaotic. We demanded that they stop through proper motions. We proceeded with our scheduled meetings with Vice-Chair Jon Bouche leading the meeting since Chairman Christ would not conduct it. Upon completing the agenda, Chairman Christ claimed we were "at ease" the entire time and now the meeting would begin. These actions caused further division and

confusion for the body.

January 3, 2023

25. At our January 3, 2022 CEC meeting (FC), I was out of town but secured Dale Fessenden (Vacancy member and Pct Chair 17) to conduct the Vacancy Report in my absence. Four (4) new chairs were appointed by 47 precinct chairs (44.34% of the entire CEC) to fill vacant precincts positions.

Our Vacancy Committee met and vetted and interviewed qualified people on December 20, 2022 to fill vacancies after we became aware of the chairs that had resigned. Chairman Christ and our secretary, Staci Earnest were notified by email on 1/5/23 of these appointments. Chairman Christ has failed to upload these appointees to the SOS as required by TEC 172.029.

PCT	NAME	DATE APPOINTED	OCCUPATION	ADDRESS
39	LAUREN VICKERS	1/3/23	HOMESCHOOL MOM	8413 Prince Charles Ct, Montgomery, TX 77316
42	BILL PHILIBERT	1/3/23	SALES	13455 Rogilio Rd, Conroe, TX 77306
82	BLAKE HALL	1/3/23	RETIRED	20612 SOUTHWOOD OAKS DR PORTER, TX 77365
90	TANYA MARTINEZ	1/3/23	REALTOR	146 Sugar Pine Ct Montgomery, TX 77316

26. On January 3, Becky Vance (member of the Christ Group, and pretend chair of that faction's Vacancy Committee) announced that Clarence Lewis, Jr., Pct 10 had been appointed to Precinct Chair 10 by an email vote. This vacancy was never announced nor posted on their website. They made a quick swap of names on their website and the SOS. We suspected that Mark Alan Frank (Pct 10) had moved from precinct 10. Mark Frank told a handful of members at the May 2022 CEC Pot Luck Dinner/meeting that he had moved. When confronted, he denied that he had moved.

Account of Damaging and personally harmful things that have transpired:




27. James Byers, with the apparent blessing of Bryan Christ, is browbeating and attacking those of us who were legitimately elected as committee chairs, as follows:

Allison Winters - Pretender of the Vacancy Committee

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Inbox



Thu, Jul 28, 2022, 12:35 AM

James Byers [byersjt@yahoo.com](mailto:byersjt@yahoo.com)

to [citizenbyers@yahoo.com](mailto:citizenbyers@yahoo.com), Bryan

To all Montgomery County Republican Party (MCRP) Precinct Chairs:

Ms. Allison Winters chose to bother us all yet again. This is just a short note. If you know sincere persons interested in serving as a Precinct Chair to fill a vacancy, please save them the awkwardness of finding out that Ms. Allison Winters is actually not the Chairman of the Vacancy Committee. Her claim is a continuation of the thoroughly abominable charade from Saturday morning July 23, 2022. No matter how many pretenders announce they have an official capacity in our MCRP, absolutely nothing from that morning has been recognized as a legitimate meeting of the County Executive Committee (CEC) by any Party Official, specifically not by our County Chairman, the State Chairman, nor the SREC. Until that occurs, all emails such as this are frauds, and Allison Winters knows it.

When notices such as the one below from Allison Winters are sent to us, as much as it might bother you, I will accompany such emails with another to counter this willful deception.

Please be patient and wait for order in the MCRP to be restored.

Sincerely,  
[James Byers, Precinct 24 Chair](#)  
[Montgomery County Republican Party of Texas](#)  
 (281) 300-0058

On Wednesday, July 27, 2022 at 11:44:59 PM CDT, A W <[aywinter@gmail.com](mailto:aywinter@gmail.com)> wrote:  
 Hello fellow Precinct Chairs!

It has been a pleasure to serve in the past as MCRP Vacancy Chairman and I look forward to serving the next two years!

If you are interested in serving on the Vacancy Committee, please let me know. Several have expressed interest in being on it. The minimum is five and the maximum allowed on the Vacancy Committee is fifteen.

We typically meet the week before each CEC meeting. As a committee, we will choose the day that is best while keeping in mind when most prospects can attend interviews.

I am looking for people who are willing to work (it can be tedious), are dependable in their attendance, have strong conservative values, are friendly, and respect the confidential nature of a candidate's interview. Recruiting experience is a plus as are research skills.

Please reply to this email if you are interested in being a part of the Vacancy Committee.

Thank you,  
 Allison Winter  
 Montgomery County Republican Party  
 2022-2024 Vacancy Chair

28. I also received this email from Byers on January 17, 2023, falsely accusing me of embezzlement, bank fraud, and threatening to remove as Precinct Chair 59 (I've removed the graphics and Zoom information, and kept the text only.)

Notice of Investigation for Violations of the MCRP Code of Conduct and Ethics

James Byers [mcrp.conduct.and.ethics@gmail.com](mailto:mcrp.conduct.and.ethics@gmail.com)

Tue, Jan 17, 8:01 AM (11 days ago)

to me

Precinct 59 Chair Allison Winter,

This is your notice that the MCRP Committee on Conduct and Ethics on January 20, 2023, @6:30 PM will examine evidence of actions you have made in violation of the MCRP Code of Conduct and Ethics (attached), RPT Rules, and the Texas Election Code. You will be given an opportunity to speak in your behalf, but at that time a vote will be taken only on whether to proceed with a formal investigation.

If approved, once the formal investigation has been completed, you will be given a 7 day notice of the meeting during which a final vote will be taken on these violations.

Documentation will be presented regarding the following Level 1 violations:

- 1) Conspiracy to commit bank fraud
  - a. On Saturday August 13, 2022, at a Freedom Caucus meeting purporting to be a Special CEC Meeting, you were presented the document "Exhibit G 2022 Bank Authorization.pdf" signed by Staci Earnest. Jon Wertz, Jon Bouche, and Charles Shirley explained and advocated use of that document to lead Sunflower bank into thinking the County Chairman had been removed as Chairman and therefore should also be removed from the MCRP bank account at Sunflower Bank without the County Chairman's knowledge or consent.
  - b. At that same meeting you voted to approve and support the plan presented by John Wertz, Jon Bouche, and Charles Shirley to defraud Sunflower Bank with the purpose of embezzling Party funds.
- 2) Committed bank fraud with intent to embezzle
  - a. On August 15, 2022, John Wertz, Jon Bouche and Charles Shirley, presented the fraudulent document "Exhibit G 2022 Bank Authorization.pdf" to Sunflower Bank, which you approved of their doing so in accordance with that plan that you supported. Because of your approval and support for the fraudulent bank authorization document and plan, Sunflower Bank removed the primary signatory County Chairman Bryan Christ from the account without the County Chairman's knowledge or consent and without Executive Committee approval, all of which you intended to happen.
- 3) Conspired to embezzle and did in fact embezzle County Executive Committee funds
  - a. When with your approval and support, fellow conspirators John Wertz, Jon Bouche, and Charles Shirley seized and took possession of the Sunflower Bank account, the reported balance was \$54,401 on August 15, 2022.
  - b. From August 15, 2022, to date, with the account balance now at \$31,134, a total of at least \$23,267 have been embezzled.
- 4) Missed four(4) Consecutive CEC Meetings. You were absent from the following meetings:
  - a. Special CEC 8/13/2022
  - b. Emergency CEC 8/31/2022
  - c. Special CEC 9/6/2022
  - d. Regular CEC 12/5/2022

...

Chairman James Byers, Conduct and Ethics Committee  
Montgomery County Republican Party, Texas

29. Christ sent out an email by Chairman Christ to MCRP entire county-wide database with incorrect, misstated facts, and false information on January 17, 2023.

30. On December 20, Christ advertised “two vacancies’ that do not exist and announced new MCRP officers that were elected for positions (they were already filled on July 23, 2022). This disinformation was sent to the entire MCRP database.

31. As Vacancy Chair, it has been very discouraging to work tirelessly to find strong conservatives who are qualified and desire to serve as a precinct chair only to have Bryan Christ deny they were indeed properly appointed. It is discouraging to the new Precinct Chairs who have committed to serve in this capacity as well disheartening to me as well.

32. CEC members are exhausted from the duplicate and unnecessary frequent meetings which are a direct product of Christ’ and Byers’ actions.

33. Christ had the locks were changed on the Headquarters and we have been denied access to hold meetings there and do party work.

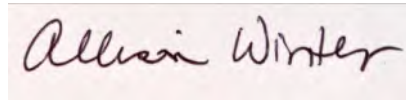
34. Christ has denied our access to the party website to post upcoming committee meetings, committee minutes, or to post vacancies and appointed precinct chairs.

35. The Christ Group has created a Code of Conduct and Ethics Committee which is not listed in our bylaws. The rules of the Code of Conduct and Ethics were sent out to the CEC by James Byers. They are restrictive, punitive, threatening and unnecessary, as shown in the above email that Byers sent to me.

I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on January 29, 2023.

signed: \_\_\_\_\_

A rectangular box containing a handwritten signature in dark ink that reads "Allison Winter".

Allison Winter

**DECLARATION of GWEN WITHROW**  
 (TEX. CIV. PRAC. & REM. CODE § 132.001)

My name is Gwen Withrow; my date of birth is [REDACTED] and my address is [REDACTED]  
 [REDACTED] I declare under penalty of perjury that the following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary.
2. I have been personally present at events concerning a division of the Montgomery County Republican Party Executive Committee ("CEC"), and write this declaration in support of legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC's orderly participation in county elections, as I am aware that Bryan Christ, the elected Montgomery County Republican Party Chair, is not accurately recognizing properly seated chairs or managing the CEC's resources, such as the space leased by the Montgomery County Republican party, its bank account, and its website.
3. I hold the position of Republican Precinct Chair 72 in Montgomery County, which I obtained by appointment on July 23, 2022, after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day.
4. My predecessor, Martha Ann Kate resigned from her position as precinct chair #72 from her position as precinct chair on June 7, 2022, by email to Bryan Christ and Raquel Lewis, and Allison Winter, Vacancy Chairman. Raquel Lewis was the secretary of the Montgomery County Republican Party at the time. I have faithfully reproduced that email here, on which I was copied and received:

From: "Ann Kate"  
 To: "Bryan Christ", "Raquel Lewis", "[Aywinter@gmail.com](mailto:Aywinter@gmail.com)"  
 Cc: "Gwen Withrow"  
 Sent: Tuesday June 7 2022 11:07:12AM  
 Subject: Precinct chair resignation

Please accept my resignation as Precinct 72 chairman. After 8 years as chairman I feel it is time for me to let someone else be in charge of my wonderful, heavily Republican, precinct. I hope to become involved in something other than politics, but will continue to support the Republican Party in other ways.

I would like to recommend Gwen Withrow to replace me as chairman of precinct 72. Gwen and her husband recently moved to Bentwater, in Precinct 72, but she has been active in Republican politics for many years and in many capacities. She is currently the SD4 SREC representative.

Good luck to the CEC in the coming two years. I hope some real work will get done for the Party.

Ann Kate  
 Pct. 72 Chairman

5. Section 6 of the Montgomery County Republican Party Bylaws<sup>1</sup> governs resignations of precinct chairs, stating that written resignations given in writing to the secretary of the CEC are effective immediately. I have copied the relevant section below:

**Section 6. Resignation and Removal**

If a member or an officer of the Executive Committee wishes to resign,

1. The member or officer must give written notice to the Secretary.
2. If the notice is not specific to position of resignation, it applies to all positions held within the Executive Committee.
3. If the notice is not specific to the effective date of the resignation, it is effective immediately upon receipt by the Secretary.
4. Failure to follow the duties of a member is subject to formal reprimand, censure, and removal in accordance with the resolution adopted by the Executive Committee, TEC 171.029 and RPT rule 8n. Any such action requires two thirds (2/3) approval of members present and voting (not counting vacancies) with at least 50% of the members voting.

6. In spite of the resignation email sent by Martha Ann Kate, her name was called as though she was still on the list of precinct chairs during the July 23, 2022 meeting. During that meeting, the CEC determined that she had resigned, and I was nominated to fill the vacancy caused by Martha Ann Kate at an emergency meeting of the CEC on July 23, 2022, and appointed by the CEC by unanimous vote at that meeting.

7. I have obtained a copy of the list of precinct chairs given by Bryan Christ to the Texas Secretary of State, and learned that Christ has refused to recognize my appointment. I am aware that Christ's failure to list me properly is a violation of his ministerial duties described at section 172.118 of the Texas Election Code.

8. I have also seen a call for a specially called meeting on July 25, 2022, issued by Christ. According to section 2 of the CEC's Bylaws, special meetings must have a list of precinct chairs who are supporting that call which equals 20% of the total membership (not including vacancies). Christ is using Martha Ann Kate on his list of supporting precinct chairs when he called that meeting.

9. I have been a long-time activist in the Republican Party, and currently serve on the State Republican Executive Committee. I am aware that dueling sets of precinct chairmen will cause difficulties as the election draws near. Additionally, precinct chair lists are public information (see section 172.029(b) of the Texas Election Code). As a long-time activist, I am aware that candidates depend on these lists in their outreach efforts.

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<sup>1</sup> These by-laws are maintained on the CEC's website at <https://static1.squarespace.com/static/632a33aaad395c03987c7993/t/632f6561c02a616c3061630b/1664050530030/MCRP+2020-2022+Bylaws+-+FINAL.pdf> (last accessed on January 15, 2023).

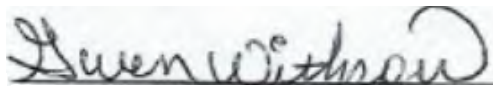
10. Additionally, precinct conventions are historically run by precinct chairs or their agents and allies. If this matter is not resolved, we may well have competing claims and disputes about which precinct convention held for a precinct is valid.

11. Aside from the challenges of disputed precinct chair lists, Christ is refusing to allow access to CEC resources and meeting space, and claiming to fill precinct chair vacancies through a committee of his ~20 supporting precinct chairs, which is not close to a majority of the CEC; all of these appointments appear to be invalid to me.

12. As I have watched the division in the CEC, it appears that about one-third of the precinct chairs support Christ, and two-thirds are opposed to his leadership actions. The result of his lack of support means that none of his meetings can appoint a person to a vacant precinct chair, as such votes require a one-third quorum of the CEC. His divisive approach resulted in a complaint signed by a majority of the CEC in late 2022, along with a vote of no confidence.

13. I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on January 24, 2023.

A handwritten signature in cursive script, appearing to read "Gwen Withrow", written in dark ink on a light background.

printed name: Gwen Withrow

From: "Ann Kate"  
To: "Bryan Christ", "Raquel Lewis", "[Aywinter@gmail.com](mailto:Aywinter@gmail.com)"  
Cc: "Gwen Withrow"  
Sent: Tuesday June 7 2022 11:07:12AM  
Subject: Precinct chair resignation

## Exhibit 64

Please accept my resignation as Precinct 72 chairman. After 8 years as chairman I feel it is time for me to let someone else be in charge of my wonderful, heavily Republican, precinct. I hope to become involved in something other than politics, but will continue to support the Republican Party in other ways.

I would like to recommend Gwen Withrow to replace me as chairman of precinct 72. Gwen and her husband recently moved to Bentwater, in Precinct 72, but she has been active in Republican politics for many years and in many capacities. She is currently the SD4 SREC representative.

Good luck to the CEC in the coming two years. I hope some real work will get done for the Party.

Ann Kate  
Pct. 72 Chairman



From: Bryan Christ <bryan4mcrp@gmail.com>  
Date: Tue, Jun 7, 2022 at 12:04 PM  
Subject: Re: Precinct chair resignation  
To: Ann Kate <annkate43@gmail.com>  
Cc: Raquel Lewis <raquel-lewis@outlook.com>, Aywinter@gmail.com  
<aywinter@gmail.com>, Gwen Withrow <greck@gt.rr.com>

Ann,

I'm sorry to hear that. As a matter of technicality I can accept your resignation only for the current biennium. As far as the SOS is concerned and the Texas Election Code goes, you will be seated as a Pct Chair on June 13th. Related to this, there are two governing clauses in the TEC which preclude a Pct Chair vacancy from being filled until after we have codified our Bylaws for the new biennium at the Organizational Meeting. Feel free to give me a call if you have any questions.

Bryan

On Tue, Jun 7, 2022 at 11:06 AM Ann Kate <annkate43@gmail.com> wrote:

Please accept my resignation as Precinct 72 chairman. After 8 years as chairman I feel it is time for me to let someone else be in charge of my wonderful, heavily Republican, precinct. I hope to become involved in something other than politics, but will continue to support the Republican Party in other ways.

I would like to recommend Gwen Withrow to replace me as chairman of precinct 72. Gwen and her husband recently moved to Bentwater, in Precinct 72, but she has been active in Republican politics for many years and in many capacities. She is currently the SD4 SREC representative.

Good luck to the CEC in the coming two years. I hope some real work will get done for the Party.

Ann Kate  
Pct. 72 Chairman



From: "Ann Kate"  
To: "Gwen Withrow"  
Cc:  
Sent: Tuesday July 12 2022 7:43:49PM  
Subject: Fwd: Notice of CEC Organizational Meeting

FYI in case you didn't get this. As you know, I will be in Dallas babysitting my grandson.

Ann

----- Forwarded message -----

From: **Bryan Christ** <bryan4mcrp@gmail.com>  
Date: Tue, Jul 12, 2022 at 5:59 PM  
Subject: Notice of CEC Organizational Meeting  
To:

All Pct Chairs,

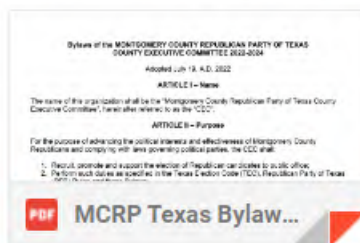
This is the official meeting call for the 2022-2024 CEC Organizational Meeting to be held on July 19th at 6:30p at the Sadler Building. Attached you will find the agenda for the meeting and the proposed bylaws. The proposed bylaws are the collective product of the 5 workshops that many of you participated in. The sharing of ideas and collaboration was wonderful!

The proposed bylaws represent one of many possibilities. ***Where there was significant debate, variations have been captured in a separate doc.*** This doc will be circulated soon as a set of possible amendments (which we called options) during the workshops. ***We will walk through the proposed bylaws and apply these options through the amendment and voting process.***

--

Bryan Christ  
MCRP Chairman

2 Attachments • Scanned by Gmail ⓘ



From: "Ann Kate"  
To: "Gwen Withrow"  
Cc:  
Sent: Monday June 13 2022 6:57:34PM  
Subject: Fwd: Bylaw Workshops

I'm not sure if you will have replaced me by then, but I'll be in Colorado.

----- Forwarded message -----

From: **Bryan Christ** <bryan4mcrp@gmail.com>  
Date: Mon, Jun 13, 2022 at 6:34 PM  
Subject: Bylaw Workshops  
To:

Good evening 2022 Pct Chairs. There will be 4 bylaw workshops conducted in late June / early July. Here are the dates and times. I encourage everyone that can attend to do so. Your thoughts and ideas are important!

Location: Conroe Chamber of Commerce

Saturday, June 25th, 9:30a - 11:30a  
Thursday, June 30th, 6:30p - 8:30p  
Tuesday, July 5th, 6:30p - 8:30p  
Saturday, July 9th, 9:30a - 11:30a

I look forward to seeing you there!

--

Bryan Christ  
MCRP Chairman

**DECLARATION**

(TEX. CIV. PRAC. &amp; REM. CODE § 132.001)

My name is Jon Bouché and my date of birth is [REDACTED] and my address is [REDACTED]  
[REDACTED] and I declare under penalty of perjury that the  
following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary.
2. I have been personally present at events concerning a division of the Montgomery County Republican Party Executive Committee ("CEC"), and write this declaration in support of legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC's orderly participation in county elections, as I am aware that Bryan Christ, the elected Montgomery County Republican Party Chair, is not accurately recognizing properly seated chairs or managing the CEC's resources, such as the space leased by the Montgomery County Republican party, its bank account, and its website.
3. I hold the position of Republican Vice Chair in Montgomery County, having obtained that seat as indicated below by the checked paragraph:
  - ☐ ELECTED AND NOT DISPUTED - I was elected to the office of Precinct Chair during the 2022 Republican Primary and to my knowledge, no one contests my election or position as a duly elected Precinct Chair and member of the CEC.
  - ☐ APPOINTED AND NOT DISPUTED - I was appointed to the office of Precinct Chair on \_\_\_\_\_ after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. To my knowledge, no one has challenged my position and all members of the CEC accept my appointment.
  - ☒ APPOINTED BUT DISPUTED - I was appointed to the office of Vice Chairman on July 23, 2022 after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. I am aware that Bryan Christ has claimed to have appointed someone else to this position or otherwise asserts that my claim to this position is not valid.

4. I have also seen a call for a specially called meeting for August 13, 2022, issued by Christ. According to Art. VI, Section 2 of the [CEC's 2020 Bylaws](#), Special Meetings must have a list of precinct chairs who are supporting that call which equals 20% (20 of 97 of the total membership, not including vacancies). He did not reach that threshold in only gathering 19 signatures. In that illegitimate meeting, they elected officers and carried on business that is null & void.
5. I have been a long-time activist in the Republican Party. I am aware that dueling sets of precinct chairmen will cause difficulties as the election draws near. Additionally, precinct chair lists are public information (see section 172.029(5)b of the Texas Election Code). I am aware that candidates depend on these lists.
6. Additionally, precinct conventions are historically run by precinct chairs or their agents and allies. If this matter is not resolved, we may well have competing claims and disputes about which precinct convention held for a precinct is valid.
7. I was provided a copy of Pct. Chair 24 James Byers Collusion email (via the RPT Rule 8M complaint) that he sent prior to the Organizational Meeting to Chairman Christ and his selected parliamentarian to coordinate hijacking of the July 19th meeting. This email laid out the process of the meeting, thereby predetermining the outcome and disfranchising public debate and the will of the body.
8. During the July 19th meeting when voting on the amended agenda prior to the vote Mr. Byers "calls for division" (44 minutes and 6 seconds [in the video](#)). After deliberation with the parliamentarian, the chairman ruled that it was division of the question (44 minutes and 40 seconds [in the video](#)) and therefore every point on the agenda must be voted on separately. The call for division was clearly a call for the division of the assembly (vote), not division of the question. The Chairman made decisions to be dilatory and to unnecessarily extend the meeting in an effort to frustrate the process.
9. The amended agenda, by the conservative majority, for the July 19th meeting was approved (47 for to 31 against, at the [1hr 19min mark of the video](#)). The last item on the agenda was that the meeting will "adjourn at the completion of the agenda"(RONR 21:3). Mr. Fred Sunderman motioned for an adjournment (meaning a recess) "until the two sides can work it out". The chairman got a second and it quickly went to a voice vote without the chairman articulating the motion to adjourn.

10. Upon saying we were adjourned, at least two precinct chairs asked for division of the vote. The chairman ignored them(violating RONR 21:12). The voice vote was questionable if even it made a majority, much less 2/3rds that he claims. In this instance it would have required a 2/3 vote to amend the adopted agenda (adjournment (RONR 41:63)).
11. In the 7/23 reconvening Organizational meeting, the chairman wanted to vote on a “preferred” agenda (of two) prior to the start of the meeting. This was out of order since the conservative (amended) agenda had been adopted on July 19, 2022 (see No. 10 above). After this meeting was started the chairman refused to chair the reconvened meeting ([TEC 171.022\(a\)1](#)) - subsequently the body removed him via RONR 62:10.
12. Statutory required failure to report multiple (16) precinct chairs on time to Secretary of State from the 5/24/22 election, as well as 13 others that were seated thereafter on 7/23/22 and 8/13/22 ([TEC 172.118](#)), potentially hindering our November GOTV effort. Four others were appointed on Jan 3rd but not reported by Christ.
13. Statutory required failure to report resigned precinct chair (72 - Ann Kate) and allowing her to participate in voting and counting her in calls for special meetings.
14. Purposely scheduling dual meetings 3 times, on top of already properly noticed meetings, at same date & time, assuring conflict, confusion & division (especially amongst new chairs), dividing everyone's loyalties, time and effort (RONR 8:2.1).
15. Improperly noticed online meetings by his precinct chairs (should be the chairman - [RPT rule 8J](#)).
16. Neither proper credentials nor instructions were included (7/25/22 & 9/1/22) and meetings were rigged to control the outcome in disallowing open participation by muting everyone’s mic, nor providing properly required transparent business protocol or simultaneous documentation during zoom meeting ([RPT Rule 8j](#) and RONR 9:36). Also, on 7/25 he refused to accept some motions. In addition, he kept members in the waiting room (8/31), not allowing participation in the zoom meeting. His failure to send to the CEC the meeting minutes and post to the website in accordance with bylaws has caused confusion by not having the record of the business that occurred and to be taken up at (future) meetings, violating Art. VIII of the 2020 MCRP bylaws.
17. He’s prevented conservative leadership access to HQ and to the website, stifling GOTV since at least mid-December.
18. Aside from the challenges of disputed precinct chair lists, Christ is refusing to allow access to CEC resources and meeting space and claiming to fill precinct chair

vacancies through a committee of his 30+ supporting precinct chairs, which is not close to a majority of the CEC; all these appointments appear to be invalid to me.

19. As I have watched the division in the CEC, it appears that about one-third of the precinct chairs support Christ, and two-thirds are opposed to his leadership actions. The result of his lack of leadership and support means that none of his meetings can appoint a person to a vacant precinct chair, as such votes require a one-third quorum of the CEC. His divisive approach resulted in a RPT Rule 8M complaint signed by a majority of the CEC on August 15, 2022, along with a vote of No Confidence on January 3, 2023.

20. On January 17, 2023, Chairman Christ sent an email out to the Republican Party mailing list in Montgomery County in which he defamed me by claiming that I had committed fraud and embezzlement and that this matter was “in the hands of law enforcement”. After Chairman Christ sent out that email on January 17, 2023, I have received several calls in which people have asked if I had been arrested. I believe Chairman Christ’s dishonest actions in spreading this false information has damaged my reputation in Montgomery County.

21. I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on January 30, 2023.

signed: Jon Bouche

printed name: Jon Bouché



## DECLARATION OF STACI EARNEST

My name is Staci Earnest; my date of birth is [REDACTED] and my address is [REDACTED]  
[REDACTED] I declare under penalty of perjury that the following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary.
2. I have been personally present at events concerning a division of the Montgomery County Republican Party Executive Committee ("CEC"), and write this declaration in support of legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC's orderly participation in county elections, as I am aware that Brian Christ, the elected Montgomery County Republican Party Chair, is not accurately recognizing properly seated chairs, is exhibiting bias in favor of the minority faction of the CEC during meetings or derelict in his responsibilities in the management of the CEC's resources, such as the space leased by the Montgomery County Republican party and its website.
3. I hold the position of Secretary for the Montgomery County Republican Party in Montgomery County, having obtained that position during the properly called reconvened organizational meeting on at the 7/23/22.
4. Martha Ann Kate resigned from her position as precinct chair #72 from her position as precinct chair on June 7, 2022, by email to Bryan Christ and Raquel Lewis, who was the secretary of the Montgomery County Republican Party at the time. Additionally, Allison Winter (Vacancy Chair) was cc'd on Ms. Kates email and I have faithfully reproduced that email here, on which was properly received

From: "Ann Kate"  
To: "Bryan Christ", "Raquel Lewis", "[Aywinter@gmail.com](mailto:Aywinter@gmail.com)"  
Cc: "Gwen Withrow"  
Sent: Tuesday June 7 2022 11:07:12AM  
Subject: Precinct chair resignation

Please accept my resignation as Precinct 72 chairman. After 8 years as chairman I feel it is time for me to let someone else be in charge of my wonderful, heavily Republican, precinct. I hope to become involved in something other than politics, but will continue to support the Republican Party in other ways.

I would like to recommend Gwen Withrow to replace me as chairman of precinct 72. Gwen and her husband recently moved to Bentwater, in Precinct 72, but she has been active in Republican politics for many years and in many capacities. She is currently the SD4 SREC representative.

Good luck to the CEC in the coming two years. I hope some real work will get done for the Party.

Ann Kate  
Pct. 72 Chairman



5. Art. III, Sect 6(3) of the Montgomery County Republican Party Bylaws<sup>1</sup> governs resignations of precinct chairs, stating that written resignations given in writing to the secretary of the CEC are effective immediately. I have copied the relevant below:

**Section 6. Resignation and Removal**

If a member or an officer of the Executive Committee wishes to resign,

1. The member or officer must give written notice to the Secretary.
2. If the notice is not specific to position of resignation, it applies to all positions held within the Executive Committee.
3. If the notice is not specific to the effective date of the resignation, it is effective immediately upon receipt by the Secretary.
4. Failure to follow the duties of a member is subject to formal reprimand, censure, and removal in accordance with the resolution adopted by the Executive Committee, TEC 171.029 and RPT rule 8n. Any such action requires two thirds (2/3) approval of members present and voting (not counting vacancies) with at least 50% of the members voting.

6. In spite of the resignation email sent by Martha Ann Kate, her name was called as though she was still on the list of precinct chairs during the July 23, 2022 meeting. During that meeting, the CEC determined that she had resigned, and Gwen Withrow was nominated to fill the vacancy caused by Martha Ann Kate at an emergency meeting of the CEC on July 23, 2022, and appointed by the CEC by unanimous vote at that meeting.

7. After reviewing a copy of the list of precinct chairs given by Bryan Christ to the Texas Secretary of State, I learned that Christ has refused to recognize Gwen Withrow's appointment. I am aware that Christ's failure to list Gwen Withrow properly is a violation of his ministerial duties described at section 172.118 of the Texas Election Code.

8. I have also seen a call for a specially called meeting on or about August 13, 2022, issued by Christ. According to Art VI, Section 2 of the CEC's Bylaws, special meetings must have a list of precinct chairs who are supporting that call which equals 20% of the total membership (not including vacancies). Christ is using Martha Ann Kate on his list of supporting precinct chairs when he called that meeting.

9. I have been a long-time activist in the Republican Party and I am aware that dueling sets of precinct chairmen will cause difficulties as the election draws near. Additionally, precinct chair lists are public information (see section 172.029(b) of the Texas Election Code). I am aware that candidates depend on these lists.

<sup>1</sup> These by-laws are maintained on the CEC's website at

<https://static1.squarespace.com/static/632a33aaad395c03987c7993/t/632f6561c02a616c3061630b/1664050530030/MCRP+2020-2022+Bylaws+--FINAL.pdf> (last accessed on January 15, 2023).



10. Additionally, precinct conventions are historically run by precinct chairs or their agents and allies. If this matter is not resolved, we may well have competing claims and disputes about which precinct convention held for a precinct is valid.

11. I was provided a copy of Pct. Chair 24 James Byers Collusion email that he sent prior to the Organizational Meeting to Chairman Christ and his selected parliamentarian to coordinate hijacking of the July 19th meeting. This email laid out the process of the meeting, thereby predetermining the outcome and disfranchising public debate and the will of the body.

12. During the July 19th meeting when voting on the amended agenda prior to the vote Mr. Byers "calls for division" (44 minutes and 6 seconds in the video). After deliberation with the parliamentarian, the chairman ruled that it was division of the question (44 minutes and 40 seconds in the video) and therefore every point on the agenda must be voted on separately. The call for division was clearly a call for the division of the assembly (vote), not division of the question. The Chairman made decisions to be dilatory and to unnecessarily extend the meeting in an effort frustrate the process. Please see #11 above.

13. The amended agenda, by the conservative majority, for the July 19th meeting was approved (47 for to 31 against). The last item on the agenda was that the meeting will "adjourn at the completion of the agenda". Mr. Fred Sunderman motioned for a recess "until the two sides can work it out". The chairman got a second and it went to a voice vote. Upon saying we were adorned, I immediately (with at least two other people) asked for division of the vote. The chairman looked me square in the eye shaking his head NO! (Violating RONR 21:12). The voice vote was questionable if even made 50%. In this instance it would have required a 2/3 vote to amend the adopted agenda (adjournment (RONR 41:63)).

14. The chairman wanted to vote on a "preferred" agenda prior to the start of the July, 23, 2002 meeting. This was out of order since an agenda had ben adopted on July 19, 2022 (see 13 above). After this meeting was started the chairman refused to chair the reconvened 7/23/22 Organization meeting (TEC 171.022) -subsequently the body removed him via RONR 62:10.

15. Statutory required failure to report multiple (16) precinct chairs on time to Secretary of State from the 5/24/22 election, as well as 13 others that were seated thereafter on 7/23/22 and 8/13/22 (TEC 172.118), potentially hindering our November GOTV effort.

16. Statutory required failure to report resigned precinct chair (72 - Ann Kate) and allowing her to participate in voting and counting her in calls for special meetings.



17. Purposely scheduling dual meetings 3 times, on top of already properly noticed meetings, at same date & time, assuring conflict, confusion & division (especially amongst new chairs), dividing everyone's loyalties, time and effort (RONR 8:2.1).

18. Improperly noticed online meetings by his precinct chairs (should be the chairman-RPT rule 8J).

19. Neither proper credentials nor instructions were included (7/25/22 & 9/1/22) and meetings were rigged to control the outcome in disallowing open participation by muting everyone's mic, nor providing properly required transparent business protocol or simultaneous documentation during zoom meeting (RPT Rule 8j and RONR 9:36). Also, on 7/25 he refused to accept some motions. In addition, he kept members in the waiting room (8/31), not allowing participation in the zoom meeting. His failure to send to the CEC the meeting minutes and post to the website in accordance with bylaws has caused confusion by not having the record of the business that occurred and to be taken up at (future) meetings.

20. He's prevented conservative leadership access to HQ and to the website, stifling get-out-the-vote efforts.

21. Aside from the challenges of disputed precinct chair lists, Christ is refusing to allow access to CEC resources and meeting space and claiming to fill precinct chair vacancies through a committee of his 30+ supporting precinct chairs, which is not close to a majority of the CEC; all these appointments appear to be invalid to me.

22. As I have watched the division in the CEC, it appears that about one-third of the precinct chairs support Christ, and two-thirds are opposed to his leadership actions. The result of his lack of leadership and support means that none of his meetings can appoint a person to a vacant precinct chair, as such votes require a one-third quorum of the CEC. His divisive approach resulted in a RPT Rule M complaint signed by a majority of the CEC on August 15, 2022, along with a vote of no confidence on January 3, 2023.

23. On January 9, 2023 my husband (Kenneth Earnest Precinct 6 chair) received an email from James Byers from the illegitimate "Conduct and Ethics Committee", of which he proports to be the Chairman of the Committee. Kenneth is accused of a "Level 1 violations": 1) Conspiracy to commit bank fraud; 2) Committed bank fraud with intent to embezzle; 3) Conspired to embezzle and did in fact embezzle County Executive Committee funds; 4) Missed four (4) consecutive CEC meetings. Kenneth responded to Mr. Byers by asking two questions; 1) Provide confirmation that Chairman Christ is aware and endorses your investigation and 2) Provide documentation that you have the authority you are claiming. Mr. Byers response to Chairman Christ knowing was non-responsive and he indicated this was within his authority. On the second point Mr. Byers

said the committee was created at the illegitimate August 13, 2022 meeting and he was illegitimately elected at the September 6, 2022. Based on a review of the September 6, 2022, meeting minuets, it appears that after all other committees are assigned, Mr. Byers nominated himself as "Chairman of the Conduct and Ethics Committee." These accusations are being leveled by the minority faction in the CEC in an effort to silence Kenneth and to replace Kenneth with a precinct chair the minority faction favors.

24. On January 17, 2023, Chairman Bryan Christ sent out email to the undisclosed distribution list and attached a document titled "What's Going on in the Montgomery County Republican Party?" In this document, he includes my name and associates me with unfounded accusations of "defiance, false statements and bank fraud," defaming me.

25. I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on February 2, 2023.

  
Staci Earnest



**DECLARATION**

(TEX. CIV. PRAC. &amp; REM. CODE § 132.001)

My name is Charles R. Shirley; my date of birth is \_\_\_\_\_; and my address is \_\_\_\_\_ I declare under penalty

of perjury that the following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary.
2. I have been personally present at events concerning a division of the Montgomery County Republican Party Executive Committee ("CEC") and write this declaration in support of legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC's orderly participation in county elections, as I am aware that Bryan Christ, the elected Montgomery County Republican Party Chair, is not accurately recognizing properly seated chairs or officers, or managing the CEC's resources properly, such as the space leased by the Montgomery County Republican party, its bank account, and its website.
3. I hold the position of Republican Party Treasurer in Montgomery County, having obtained that seat as indicated below by the checked paragraph:

☐ ELECTED AND NOT DISPUTED - I was elected to the office of Precinct Chair during the 2022 Republican Primary and to my knowledge, no one contests my election or position as a duly elected Precinct Chair and member of the CEC.

☐ APPOINTED AND NOT DISPUTED - I was appointed to the office of Precinct Chair on \_\_\_\_\_, after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. To my knowledge, no one has challenged my position and all members of the CEC accept my appointment.

☒ APPOINTED BUT DISPUTED - I was appointed to the office of Treasurer on July 23, 2022, after nomination and election by a majority of CEC members, as reflected by the minutes of the CEC meeting held that day. I am aware that Bryan Christ has claimed to have appointed someone else to this position or otherwise asserts that my claim to this position is not valid.

4. On July 23rd, at a reconvening meeting from the July 19th organization meeting, and attended by a majority of the CEC, Chairman Bryan Christ was removed as presiding officer of that meeting, due to his unwillingness to chair it. Later in that meeting according to the agenda, along with other officers, I was appointed as Treasurer.
5. On July 28, 2022, I filed with Texas Ethics Commission ("TEC") the Form CECTA, the Appointment of a Campaign Treasurer by the Montgomery CEC (Filer ID #00083126), in accordance with appointment made on July 23, 2022 by a majority of the CEC.
6. On August 13, 2022, the majority of the CEC voted to pass a banking resolution, which added me, Vice Chair Jon P. Bouche, and John H. Wertz, Precinct 69 chair and former Treasurer, as signatories to the CEC's bank account, while removing Chairman Christ from the bank account.
7. On October 31, 2022, I filed a Form CEC with the Texas Ethics Commission (TEC), in accordance with the Texas Election Code, which is also known as the Eight Day report. This was done in conjunction with Treasurer Wertz formally retiring his CEC officer position from the TEC.
8. On December 20, 2022, Christ sent an email to the TEC stating that he did not recognize me as Treasurer and that he had already appointed another individual to that position on December 5, 2022, and he asked the TEC to remove as me as the Treasurer for Filer ID #00083126 and replace me with the individual that he appointed. Chairman Christ's actions were a result of an illegitimately called CEC meeting by an illegitimately formed Steering Committee at their illegitimate 8/13/22 meeting (they failed to reach the 20% threshold (only 19 of 97) to call that meeting).

**From:** Bryan Christ [mailto:bryan4mcrp@gmail.com]

**Sent:** Monday, November 21, 2022 5:42 PM

**Cc:** Judi Thomas; Scott Baker; James Byers; Jamie Metts, Jr.; Rebecca Vance

**Subject:** CEC Meeting December 5th

Pct Chairs,

In accordance with the MCRP Bylaws for 2020-2022 reenacted on 07/19/2022 for 2022-2024, the MCRP Steering Committee pursuant to Article VI, Section 2 calls a CEC meeting for December 5th. The agenda prepared by the Steering Committee on 11/20 is attached and includes all relevant information including time and location.

Bryan Christ

MCRP Chairman

- 
9. On December 21, 2022, the TEC asked Christ to file Form Amendment:  
Declaration



Appointment of a Campaign Treasurer by a County Executive Committee (Form ACECTA) to have me replaced with the individual that Christ appointed. Later that day, the TEC sent a Confirmation Letter to the individual that Christ appointed stating that December 21, 2022 would be his effective start date, removing me from the Treasurer position on TEC paperwork.

10. On December 22, 2022, Wertz and I reached out to our TEC contact in Austin and made an informal complaint over the telephone about Christ removing me as the Treasurer on the CEC TEC account by simply sending an email. Our contact stated that she would talk to TEC General Counsel and follow up with us.

11. After Christmas and New Year's break, on January 10, 2023, under the direction of our contact at TEC, I filed another Form CECTA with TEC, restoring me to the position of Treasurer for the CEC (Filer ID #00083126).

12. On January 12, 2023, I filed the semi-annual TEC report for CEC, which was due on January 17.

13. On January 13, 2023, Wertz filed a Freedom of Information Act ("FOIA") Request with the TEC and requested all email correspondence between the TEC and Christ, concerning Christ's attempts to remove me as Treasurer.

14. On January 26, 2023, the TEC responded to Wertz's FOIA request. I have attached a copy of the FOIA request response sent to us by the TEC.

15. I have been a long-time activist in the Republican Party, I am aware that dueling sets of precinct chairmen will cause difficulties as the election draws near. Also, having dueling sets of bank accounts and party Treasurers will also cause difficulties as the election nears. Additionally, the name of the appointed Treasurer and precinct chair lists are public information (see section 172.029(b) of the Texas Election Code). I am aware that candidates depend on these lists.

16. Additionally, precinct conventions are historically run by precinct chairs or their agents and allies. If this matter is not resolved, we may well have competing claims and disputes about which precinct convention held for a precinct is valid.

17. Aside from the challenges of disputed precinct chair lists, Christ is refusing to allow access to CEC resources and meeting space, and claiming to fill precinct chair vacancies through a committee of his ~30 supporting precinct chairs, which is not close to a majority of the CEC; and all of these appointments appear to be invalid to me.

18. As I have watched the division in the CEC, it appears that slightly less than one-third of the precinct chairs support Christ during his meetings, and two-thirds are opposed

to his leadership actions. The result of his lack of support means that none of his meetings can appoint a person to a vacant precinct chair, as such votes require a one-third quorum of the CEC, which he does not have. His divisive approach resulted in a Republican Party of Texas (RPT) Rule 8M complaint signed by a majority of the CEC in August of 2022, along with a vote of no confidence on January 3rd, 2023.

19. I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on February 10,, 2023.

signed: Charles R. Shirley

printed name: Charles R. Shirley

Dear Mr. Wertz,

This email is in response to your public information request received by the Texas Ethics Commission ("Commission") on January 13, 2023. Specifically, you requested any and all correspondence between the Commission on GOP Chairman Bryan Christ regarding his written request to remove Mr. Charles Shirley, Treasurer of Montgomery County Republican Party and replace him with Mike Medved on or about 12/20/22.

We are providing electronic copies of the documents responsive to your request. The information is included with this email as a separate attachment in PDF format. Due to the small volume of information being delivered by e-mail, there is no charge for this information.

If you have any questions, please feel free to contact our office.

Natalie McDermon  
Assistant General Counsel  
TEXAS ETHICS COMMISSION  
P.O. Box 12070  
Austin, Texas 78711-2070  
Main: (512) 463-5800  
Direct: (512) 463-5793  
[Natalie.McDermon@ethics.state.tx.us](mailto:Natalie.McDermon@ethics.state.tx.us)

The information contained in this email message (and any attachments) contains confidential information, which may also be legally privileged attorney work product and/or exempt from disclosure under applicable law. The information is intended only for the exclusive use of the addressee(s) named above and is the property of the Texas Ethics Commission. Nothing in this email is intended by the attorney to constitute a waiver of the confidentiality of this message. If the reader of this message is not the intended recipient or employee/agent of the intended recipient, you are hereby notified that any use, disclosure, dissemination, duplication, distribution or the taking of any action because of this communication is unauthorized and strictly prohibited. If you have received this email transmission in error, please contact the sender by reply e-mail and destroy all copies of the original message and its attachments. Please virus check all attachments to prevent widespread contamination and corruption of files and operating systems.



**From:** [Bryan Christ](#)  
**To:** [treasappoint](#)  
**Cc:** [Eric Opiela](#); [Mike Medved](#)  
**Subject:** Fwd: DRAFT - 00083126 - Treasurer Appointment for Montgomery county republican party  
**Date:** Tuesday, December 20, 2022 10:05:20 AM  
**Attachments:** [e\\_agta.pdf](#)  
[form\\_security.pdf](#)

---

Please see the attached amended Treasurer Appointment form for the Montgomery County Republican Party. I'm aware that Mr. Medved has already sent this but I want the Commission to be clear that I, the County Chairman, support this appointment as the duly elected Treasurer in accordance with our bylaws. This is the only new appointment I recognized since 2020.

I understand that in August of this year this Commission received an amended Treasurer appointment naming Charles Shirley as Treasurer, but Mr. Shirley was NOT elected according to our bylaws. In addition, since that time, the CEC filing under our ID of 00083126 has lost control of the bank account beginning in August., so unfortunately we cannot account for any monies that have been reported since the illegitimate appointment of Charles Shirley. I had hoped to resolve this through Party mediation but we are at an impasse. Therefore, we are starting anew with zero dollars cash on hand. I'm sorry for the inconvenience.

--

Bryan Christ  
MCRP Chairman

# AMENDMENT: APPOINTMENT OF A CAMPAIGN TREASURER BY A GENERAL-PURPOSE COMMITTEE

FORM **AGTA**  
PG 1

See AGTA Instruction Guide for detailed instructions.		1 Total pages filed: 1	
2 COMMITTEE NAME Montgomery County GOP		3 FILER ID # 00083126	
4 COMMITTEE NAME NEW		OFFICE USE ONLY Date Received	
5 ACRONYM NEW			
6 COMMITTEE ADDRESS NEW ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE		Date Hand-delivered or Postmarked	
		Receipt # Amount \$	
		Date Processed	
7 REPORTING TYPE NEW <input checked="" type="checkbox"/> REGULAR <input type="checkbox"/> MONTHLY		Date Imaged	
8 CAMPAIGN TREASURER NAME NEW MS / MRS / MR FIRST MI NICKNAME LAST SUFFIX Mr. Mike Medved			
9 CAMPAIGN TREASURER STREET ADDRESS NEW STREET ADDRESS; APT / SUITE #; CITY; STATE; ZIP CODE (residence or business)			
10 CAMPAIGN TREASURER MAILING ADDRESS NEW ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE <input type="checkbox"/> same as above			
11 CAMPAIGN TREASURER PHONE NEW AREA CODE PHONE NUMBER EXTENSION ( 936 ) 539-5858			
12 PERSON APPOINTING TREASURER FIRST MI LAST SUFFIX Bryan Christ			
13 SIGNATURE I understand that I have been appointed as the campaign treasurer for this general-purpose committee and that I am responsible for filing all required reports and that I may be subject to fines for failure to do so. I am aware of the restrictions in title 15 of the Election Code on contributions from corporations and labor organizations.  _____ Signature of Campaign Treasurer			
14 ASSISTANT CAMPAIGN TREASURER NEW FIRST MI LAST SUFFIX None			
15 ASSISTANT CAMPAIGN TREASURER ADDRESS NEW ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE None			
16 ASSISTANT CAMPAIGN TREASURER PHONE NEW AREA CODE PHONE NUMBER EXTENSION ( ) None			
<p align="center"><b>CONTINUE ON PAGE 2</b></p> <p align="center">This appointment is effective on the date it is filed with the commission.</p>			

Reset Form

Reset Page

# AMENDMENT: GENERAL-PURPOSE COMMITTEE

## CONTROLLING ENTITY INFORMATION

FORM AGTA  
PG 2

17 COMMITTEE NAME

18 FILER ID #

19 CONTROLLING  
ENTITY  
INFORMATION
☐ add  
☐ delete

FULL NAME OF CONTROLLING ENTITY

ACRONYM

☐ add  
☐ delete

FULL NAME OF CONTROLLING ENTITY

ACRONYM

☐ add  
☐ delete

FULL NAME OF CONTROLLING ENTITY

ACRONYM

☐ add  
☐ delete

FULL NAME OF CONTROLLING ENTITY

ACRONYM

20 CONTRIBUTION  
DECISION  
MAKERS
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☐ delete

First

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Last

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Suffix

21 EXPENDITURE  
DECISION  
MAKERS
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☐ delete

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ATTACH ADDITIONAL COPIES OF THIS FORM AS NEEDED

# AMENDMENT: GENERAL-PURPOSE COMMITTEE RECIPIENT COMMITTEES

FORM AGTA  
PG 3

22 COMMITTEE NAME

23 FILER ID #

24 RECIPIENT  
GENERAL  
PURPOSE  
COMMITTEES

ADD

Committee name

Committee address;

City;

State;

Zip Code

ADD

Committee name

Committee address;

City;

State;

Zip Code

ADD

Committee name

Committee address;

City;

State;

Zip Code

ADD

Committee name

Committee address;

City;

State;

Zip Code

ADD

Committee name

Committee address;

City;

State;

Zip Code

Filers may send this form to the TEC electronically at [treasappoint@ethics.state.tx.us](mailto:treasappoint@ethics.state.tx.us)  
or mail to  
Texas Ethics Commission  
P.O. Box 12070  
Austin, TX 78711-2070

For more information about where to file go to:  
<https://ethics.state.tx.us/filinginfo/QuickFileAREport.php>

ATTACH ADDITIONAL COPIES OF THIS FORM AS NEEDED

**AMENDMENT: GENERAL-PURPOSE COMMITTEE  
STATEMENT AUTHORIZING DIRECT CAMPAIGN EXPENDITURES  
FROM CORPORATION OR LABOR ORGANIZATION POLITICAL  
CONTRIBUTIONS UNDER SECTION 252.003, ELECTION CODE**

**FORM AGTA  
PG 4**

**25 COMMITTEE  
NAME**

**26 AFFIRMATION  
(If applicable)**

I swear, or affirm, under penalty of perjury that the following statement is in all things true and correct:

☐  
(Check if  
applicable)

The political committee named above is not established or controlled by a candidate or an officeholder, and will not use any political contribution from a corporation or a labor organization to make a political contribution to: (1) a candidate for elective office or an officeholder, or (2) a political committee that has not included in its campaign treasurer appointment a Statement Authorizing Direct Campaign Expenditures from Corporation or Labor Organization Political Contributions declaring the same.

☐  
(Check if  
applicable)

The Statement Authorizing Direct Campaign Expenditures from Corporation or Labor Organization Political Contributions that the political committee named above included in its campaign treasurer appointment no longer applies to the committee.

**PLEASE COMPLETE EITHER OPTION (1) OR (2) BELOW:**

**(1) Affidavit Jurat:**

\_\_\_\_\_  
Signature of Committee Representative

Notary Stamp/Seal

Sworn to and subscribed before me by \_\_\_\_\_, this the \_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_, to certify which, witness my hand and seal of office.

Signature of officer administering oath

Printed Name of officer administering oath

Title of officer administering oath

**OR**

**(2) Unsworn Declaration Jurat:**

My name is \_\_\_\_\_, and my date of birth is \_\_\_\_\_.

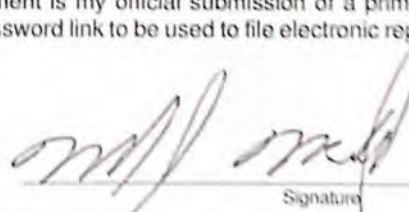
My Address is \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_.  
(street) (city) (state) (zip code) (country)

Executed in \_\_\_\_\_ County, State of \_\_\_\_\_, on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

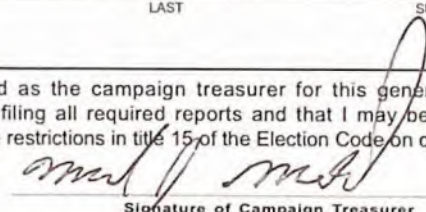
\_\_\_\_\_  
Signature of Committee Representative (Declarant)

Filers may send this form to the TEC electronically at [treasappoint@ethics.state.tx.us](mailto:treasappoint@ethics.state.tx.us) or by mail to:

Texas Ethics Commission, P.O. Box 12070, Austin, TX 78711-2070

FORM SECURITY FOR: CAMPAIGN FINANCE (Texas Ethics Commission Filers Only)		FORM SECURITY - CF																																					
Please print or type everything other than your signature. See the next page for additional information.		OFFICE USE ONLY																																					
1 FILER ID # (Ethics Commission Filers)	00083126		Date Received																																				
2 NAME OF FILER SUBMITTING PRIMARY EMAIL ADDRESS	MS / MRS / MR Mr Mike	FIRST MI	Date Hand-delivered or Date Postmarked  Date Processed  Date Imaged																																				
	NICKNAME <del>Nedved</del>	LAST Medved																																					
	SUFFIX																																						
3 COMMITTEE NAME (if committee)																																							
4 REASON FOR FILING THIS FORM (check at least one)	I want to provide my primary email address for the Texas Ethics Commission to send email password links and other notices.  I want the Texas Ethics Commission to set/reset my password.  I want the Texas Ethics Commission to clear my Security Questions and Answers.																																						
4A PRIMARY EMAIL ADDRESS																																							
5 FILER CONTACT TELEPHONE (to be used if email address is invalid)	AREA CODE (936)	PHONE NUMBER 524-3060	EXTENSION																																				
6 CAMPAIGN FINANCE FILER TYPE	<table border="0"> <tr> <td><input type="checkbox"/> COH</td> <td>CANDIDATE/OFFICEHOLDER</td> <td><input checked="" type="checkbox"/> OEC</td> <td>COUNTY EXECUTIVE COMMITTEE</td> </tr> <tr> <td><input type="checkbox"/> JOH</td> <td>JUDICIAL CANDIDATE/OFFICEHOLDER</td> <td><input type="checkbox"/> MCEC</td> <td>MONTHLY COUNTY EXECUTIVE COMMITTEE</td> </tr> <tr> <td><input type="checkbox"/> SCC/OH</td> <td>STATE/COUNTY CHAIR</td> <td><input type="checkbox"/> DCE</td> <td>DIRECT CAMPAIGN EXPENDITURES</td> </tr> <tr> <td><input type="checkbox"/> MPAC</td> <td>MONTHLY GENERAL-PURPOSE COMMITTEE</td> <td><input type="checkbox"/> ASIF SPAC</td> <td>AS IF-SPECIFIC-PURPOSE COMMITTEE</td> </tr> <tr> <td><input type="checkbox"/> GPAC</td> <td>GENERAL-PURPOSE COMMITTEE</td> <td><input type="checkbox"/> LEG</td> <td>LEGISLATIVE CAUCUS</td> </tr> <tr> <td><input type="checkbox"/> JSPAC</td> <td>JUDICIAL SPECIFIC-PURPOSE COMMITTEE</td> <td><input type="checkbox"/> PTYCORP</td> <td>POLITICAL PARTY</td> </tr> <tr> <td><input type="checkbox"/> SC SPAC</td> <td>STATE/COUNTY SPECIFIC-PURPOSE COMMITTEE</td> <td><input type="checkbox"/> SPK</td> <td>SPEAKER</td> </tr> <tr> <td><input type="checkbox"/> SPAC</td> <td>SPECIFIC-PURPOSE COMMITTEE</td> <td></td> <td></td> </tr> <tr> <td><input type="checkbox"/> SPAC</td> <td colspan="3">FILING FOR SCHOOL BOND ELECTIONS ONLY. Attach a copy of your treasurer appointment stamped by your school district.</td> </tr> </table>			<input type="checkbox"/> COH	CANDIDATE/OFFICEHOLDER	<input checked="" type="checkbox"/> OEC	COUNTY EXECUTIVE COMMITTEE	<input type="checkbox"/> JOH	JUDICIAL CANDIDATE/OFFICEHOLDER	<input type="checkbox"/> MCEC	MONTHLY COUNTY EXECUTIVE COMMITTEE	<input type="checkbox"/> SCC/OH	STATE/COUNTY CHAIR	<input type="checkbox"/> DCE	DIRECT CAMPAIGN EXPENDITURES	<input type="checkbox"/> MPAC	MONTHLY GENERAL-PURPOSE COMMITTEE	<input type="checkbox"/> ASIF SPAC	AS IF-SPECIFIC-PURPOSE COMMITTEE	<input type="checkbox"/> GPAC	GENERAL-PURPOSE COMMITTEE	<input type="checkbox"/> LEG	LEGISLATIVE CAUCUS	<input type="checkbox"/> JSPAC	JUDICIAL SPECIFIC-PURPOSE COMMITTEE	<input type="checkbox"/> PTYCORP	POLITICAL PARTY	<input type="checkbox"/> SC SPAC	STATE/COUNTY SPECIFIC-PURPOSE COMMITTEE	<input type="checkbox"/> SPK	SPEAKER	<input type="checkbox"/> SPAC	SPECIFIC-PURPOSE COMMITTEE			<input type="checkbox"/> SPAC	FILING FOR SCHOOL BOND ELECTIONS ONLY. Attach a copy of your treasurer appointment stamped by your school district.		
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<input type="checkbox"/> SPAC	FILING FOR SCHOOL BOND ELECTIONS ONLY. Attach a copy of your treasurer appointment stamped by your school district.																																						
7 FILER SIGNATURE	I swear, or affirm, under penalty of perjury, that I am the person required by law under the Texas Ethics Commission jurisdiction to file Campaign Finance reports with the Texas Ethics Commission. This document is my official submission of a primary email address for the purpose of receiving a password link to be used to file electronic reports with the Texas Ethics Commission.   Signature																																						



<b>AMENDMENT: APPOINTMENT OF A CAMPAIGN TREASURER BY A GENERAL-PURPOSE COMMITTEE</b>		<b>FORM AGTA PG 1</b>	
<b>See AGTA Instruction Guide for detailed instructions.</b>		<b>1</b> Total pages filed: <b>1</b>	
<b>2</b> COMMITTEE NAME Montgomery County GOP		<b>3</b> FILER ID # 00083126	
<b>4</b> COMMITTEE NAME NEW		<b>OFFICE USE ONLY</b>	
<b>5</b> ACRONYM NEW			
<b>6</b> COMMITTEE ADDRESS NEW ADDRESS / PO BOX: APT / SUITE #: CITY: STATE: ZIP CODE		Date Received	
<b>7</b> REPORTING TYPE NEW <input checked="" type="checkbox"/> REGULAR <input type="checkbox"/> MONTHLY		Date Hand-delivered or Postmarked	
<b>8</b> CAMPAIGN TREASURER NAME NEW MS / MRS / MR FIRST MI NICKNAME LAST SUFFIX <b>Mr. Mike Medved</b>		Receipt # Amount \$	
<b>9</b> CAMPAIGN TREASURER STREET ADDRESS (residence or business) NEW STREET ADDRESS: APT / SUITE #: CITY: STATE: ZIP CODE		Date Processed	
<b>10</b> CAMPAIGN TREASURER MAILING ADDRESS NEW ADDRESS / PO BOX: APT / SUITE #: CITY: STATE: ZIP CODE <input type="checkbox"/> same as above		Date Imaged	
<b>11</b> CAMPAIGN TREASURER PHONE NEW AREA CODE PHONE NUMBER EXTENSION ( 936 ) 539-5858		Date	
<b>12</b> PERSON APPOINTING TREASURER FIRST MI LAST SUFFIX <b>Bryan Christ</b>		Date	
<b>13</b> SIGNATURE I understand that I have been appointed as the campaign treasurer for this general-purpose committee and that I am responsible for filing all required reports and that I may be subject to fines for failure to do so. I am aware of the restrictions in title 15 of the Election Code on contributions from corporations and labor organizations.		 Signature of Campaign Treasurer	
<b>14</b> ASSISTANT CAMPAIGN TREASURER NEW FIRST MI LAST SUFFIX <b>None</b>		Date	
<b>15</b> ASSISTANT CAMPAIGN TREASURER ADDRESS NEW ADDRESS / PO BOX: APT / SUITE #: CITY: STATE: ZIP CODE <b>None</b>		Date	
<b>16</b> ASSISTANT CAMPAIGN TREASURER PHONE NEW AREA CODE PHONE NUMBER EXTENSION ( ) None		Date	
<b>CONTINUE ON PAGE 2</b> This appointment is effective on the date it is filed with the commission.			

Forms provided by Texas Ethics Commission

Reset Form

Date:

Reset Page

Revised 4/2/2021

**From:** [treasappoint](#)  
**To:** [Bryan Christ](#)  
**Cc:** [Eric Opiela](#); [Mike Medved](#)  
**Subject:** RE: DRAFT - 00083126 - Treasurer Appointment for Montgomery county republican party  
**Date:** Tuesday, December 20, 2022 3:01:00 PM  
**Attachments:** [e\\_acecta.pdf](#)

---

Thanks Bryan. However this is an incorrect form for your filer type. Can you fill out the amendment form for a CEC? One is attached.

Thanks!

*Aidan Shaughnessy*  
Program Specialist II  
Disclosure Filings Division  
Texas Ethics Commission

**From:** Bryan Christ [REDACTED]  
**Sent:** Tuesday, December 20, 2022 10:05 AM  
**To:** [treasappoint <treasappoint@ethics.state.tx.us>](mailto:treasappoint@ethics.state.tx.us)  
**Cc:** Eric Opiela <[REDACTED]>; Mike Medved [REDACTED]  
**Subject:** Fwd: DRAFT - 00083126 - Treasurer Appointment for Montgomery county republican party

Please see the attached amended Treasurer Appointment form for the Montgomery County Republican Party. I'm aware that Mr. Medved has already sent this but I want the Commission to be clear that I, the County Chairman, support this appointment as the duly elected Treasurer in accordance with our bylaws. This is the only new appointment I recognized since 2020.

I understand that in August of this year this Commission received an amended Treasurer appointment naming Charles Shirley as Treasurer, but Mr. Shirley was NOT elected according to our bylaws. In addition, since that time, the CEC filing under our ID of 00083126 has lost control of the bank account beginning in August., so unfortunately we cannot account for any monies that have been reported since the illegitimate appointment of Charles Shirley. I had hoped to resolve this through Party mediation but we are at an impasse. Therefore, we are starting anew with zero dollars cash on hand. I'm sorry for the inconvenience.

--

Bryan Christ  
MCRP Chairman



**AMENDMENT: APPOINTMENT OF A CAMPAIGN  
TREASURER BY A COUNTY EXECUTIVE COMMITTEE**
**FORM ACECTA  
PG 1**

See ACECTA Instruction Guide for detailed instructions.		1 FILER ID #	2 Total pages filed:	
<b>3</b> COMMITTEE NAME	<b>OLD</b>			
	<b>NEW</b>			
		<b>OFFICE USE ONLY</b>		
		Date Received		
<b>4</b> ACRONYM	<b>NEW</b>	Date Hand-delivered or Postmarked		
<b>5</b> PRINCIPAL COMMITTEE	<b>NEW</b>	<input type="radio"/> NO <input type="radio"/> YES		
<b>6</b> COMMITTEE ADDRESS	<b>NEW</b>	ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE		
		Date Processed		
		Date Imaged		
<b>7</b> REPORTING TYPE	<b>NEW</b>	<input type="radio"/> REGULAR <input type="radio"/> MONTHLY		
<b>8</b> CAMPAIGN TREASURER NAME	<b>NEW</b>	MS / MRS / MR FIRST MI NICKNAME LAST SUFFIX		
<b>9</b> CAMPAIGN TREASURER STREET ADDRESS (residence or business)	<b>NEW</b>	STREET ADDRESS; APT / SUITE #; CITY; STATE; Z P CODE		
<b>10</b> CAMPAIGN TREASURER MAILING ADDRESS	<b>NEW</b>	ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; Z P CODE		
<input type="checkbox"/> same as above				
<b>11</b> CAMPAIGN TREASURER PHONE	<b>NEW</b>	AREA CODE PHONE NUMBER EXTENSION		
		( )		
<b>12</b> PERSON APPOINTING TREASURER		FIRST MI LAST		
<b>13</b> SIGNATURE	<p>I understand that I have been appointed as the campaign treasurer for this county executive committee and that I am responsible for filing all required reports and that I may be subject to fines for failure to do so. I am aware of the restrictions in title 15 of the Election Code on contributions from corporations and labor organizations.</p> <div style="text-align: right; margin-top: 20px;">           _____            Signature of Campaign Treasurer         </div>			

**CONTINUE ON PAGE 2**

This appointment is effective on the date it is filed with the commission.

**AMENDMENT: COUNTY EXECUTIVE COMMITTEE  
ASSISTANT TREASURER & RECIPIENT COMMITTEES**
**FORM ACECTA  
PG 2**

<b>14</b> COMMITTEE NAME		<b>15</b> FILER ID #	
<b>16</b> ASSISTANT CAMPAIGN TREASURER	<b>NEW</b>	F RST MI LAST SUFFIX	
<b>17</b> ASSISTANT CAMPAIGN TREASURER ADDRESS	<b>NEW</b>	ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; Z P CODE	
<b>18</b> ASSISTANT CAMPAIGN TREASURER PHONE	<b>NEW</b>	AREA CODE PHONE NUMBER EXTENSION (       )	
<b>19</b> RECIPIENT GENERAL PURPOSE COMMITTEES	<b>ADD</b>	Committee name ..... Committee address; City; State; Zip Code	
	<b>ADD</b>	Committee name ..... Committee address; City; State; Zip Code	
	<b>ADD</b>	Committee name ..... Committee address; City; State; Zip Code	
	<p>Filers may send this form to the TEC electronically at <a href="mailto:treasappoint@ethics.state.tx.us">treasappoint@ethics.state.tx.us</a> or mail to  Texas Ethics Commission  P.O. Box 12070  Austin, TX 78711-2070</p> <p>For more information about where to file go to:  <a href="https://www.ethics.state.tx.us/filinginfo/QuickFileARepor.php">https://www.ethics.state.tx.us/filinginfo/QuickFileARepor.php</a></p>		

**ATTACH ADDITIONAL COPIES OF THIS FORM AS NEEDED**

**From:** [Bryan Christ](#)  
**To:** [treasappoint](#)  
**Cc:** [Eric Opiela](#); [Mike Medved](#)  
**Subject:** Re: DRAFT - 00083126 - Treasurer Appointment for Montgomery county republican party  
**Date:** Wednesday, December 21, 2022 9:38:09 AM  
**Attachments:** [IMG\\_0085.jpg](#)  
[IMG\\_0083.jpg](#)

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Aidan,

I believe this should be correct. Please let us know if you need anything else.

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Thanks!

*Aidan Shaughnessy*

Program Specialist II

Disclosure Filings Division

Texas Ethics Commission

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**To:** treasappoint <[treasappoint@ethics.state.tx.us](mailto:treasappoint@ethics.state.tx.us)>  
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**Subject:** Fwd: DRAFT - 00083126 - Treasurer Appointment for Montgomery county republican party

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--

Bryan Christ

MCRP Chairman

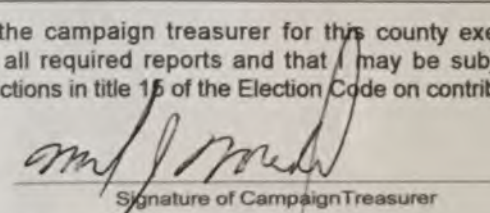
--

Bryan Christ

MCRP Chairman



**AMENDMENT: APPOINTMENT OF A CAMPAIGN  
TREASURER BY A COUNTY EXECUTIVE COMMITTEE**
**FORM ACECTA**
**PG 1**

See ACECTA Instruction Guide for detailed instructions.		1 FILER ID # 00083126		2 Total pages filed:			
3 COMMITTEE NAME	OLD	OFFICE USE ONLY					
	NEW						
Montgomery County GOP		Date Received					
4 ACRONYM	NEW	Date Hand-delivered or Postmarked					
5 PRINCIPAL COMMITTEE	NEW	<input type="radio"/> NO <input checked="" type="radio"/> YES		Receipt #	Amount \$		
6 COMMITTEE ADDRESS	NEW	ADDRESS / PO BOX, APT / SUITE #, CITY, STATE, ZIP CODE		Date Processed			
	[REDACTED]		Date Imaged				
7 REPORTING TYPE	NEW	<input checked="" type="radio"/> REGULAR <input type="radio"/> MONTHLY					
8 CAMPAIGN TREASURER NAME	NEW	MS / MRS / MR	FIRST	MI	NICKNAME	LAST	SUFFIX
Mr. Mike					Medved		
9 CAMPAIGN TREASURER STREET ADDRESS (residence or business)	NEW	STREET ADDRESS, APT / SUITE #, CITY, STATE, ZIP CODE		115 Wild Garden Ct. Conroe TX 77304			
10 CAMPAIGN TREASURER MAILING ADDRESS	NEW	ADDRESS / PO BOX, APT / SUITE #, CITY, STATE, ZIP CODE					
<input checked="" type="checkbox"/> same as above							
11 CAMPAIGN TREASURER PHONE	NEW	AREA CODE	PHONE NUMBER		EXTENSION		
(936) 524-3060							
12 PERSON APPOINTING TREASURER		FIRST	MI	LAST			
Bryan				Christ			
13 SIGNATURE	I understand that I have been appointed as the campaign treasurer for this county executive committee and that I am responsible for filing all required reports and that I may be subject to fines for failure to do so. I am aware of the restrictions in title 15 of the Election Code on contributions from corporations and labor organizations.						
 Signature of Campaign Treasurer							

CONTINUE ON PAGE 2

This appointment is effective on the date it is filed with the commission.

**AMENDMENT: COUNTY EXECUTIVE COMMITTEE  
ASSISTANT TREASURER & RECIPIENT COMMITTEES**
**FORM ACECTA  
PG 2**

<b>14 COMMITTEE NAME</b>		<b>15 FILER ID #</b>	
<b>16 ASSISTANT CAMPAIGN TREASURER</b>	<b>NEW</b>	FIRST <i>None</i>	MI LAST SUFFIX
<b>17 ASSISTANT CAMPAIGN TREASURER ADDRESS</b>	<b>NEW</b>	ADDRESS / PO BOX, APT / SUITE #, CITY, STATE, ZIP CODE <i>None</i>	
<b>18 ASSISTANT CAMPAIGN TREASURER PHONE</b>	<b>NEW</b>	AREA CODE PHONE NUMBER EXTENSION (      )	
<b>19 RECIPIENT GENERAL PURPOSE COMMITTEES</b>	<b>ADD</b>	Committee name ..... Committee address; City; State; Zip Code	
	<b>ADD</b>	Committee name ..... Committee address; City; State; Zip Code	
	<b>ADD</b>	Committee name ..... Committee address; City; State; Zip Code	
	<p>Filers may send this form to the TEC electronically at <a href="mailto:treasappoint@ethics.state.tx.us">treasappoint@ethics.state.tx.us</a> or mail to</p> <p>Texas Ethics Commission P.O. Box 12070 Austin, TX 78711-2070</p> <p>For more information about where to file go to: <a href="https://www.ethics.state.tx.us/filinginfo/QuickFileAREport.php">https://www.ethics.state.tx.us/filinginfo/QuickFileAREport.php</a></p>		
ATTACH ADDITIONAL COPIES OF THIS FORM AS NEEDED			



**From:** [treasappoint](#)  
**To:** [Bryan Christ](#)  
**Cc:** [Eric Opiela](#); [Mike Medved](#)  
**Subject:** RE: DRAFT - 00083126 - Treasurer Appointment for Montgomery county republican party  
**Date:** Wednesday, December 21, 2022 12:30:00 PM  
**Attachments:** [83126-Mike Medved-ACECTA.pdf](#)

---

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Sincerely,

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Program Specialist II  
Disclosure Filings Division  
Texas Ethics Commission

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--

Bryan Christ  
MCRP Chairman

--

Bryan Christ  
MCRP Chairman



# TEXAS ETHICS COMMISSION

P.O. Box 12070, Capitol Station  
Austin, Texas 78711-2070

Mary K. "Katie" Kennedy  
Chair

Randall H. Erben  
Vice Chair

J.R. Johnson  
Executive Director



Commissioners

Chad M. Craycraft  
Chris Flood  
Patrick W. Mizell  
Richard S. Schmidt  
Joseph O. Slovacek  
Steven D. Wolens

December 21, 2022

Mr. Mike Medved

**FILER ID:** 00083126  
**COMMITTEE NAME:** **Montgomery County GOP (CEC)**  
**DOCUMENT RECEIVED:** Amendment: Appointment of a Campaign Treasurer by a  
County Executive Committee  
**ASSISTANT TREASURER:** No One Indicated  
**EFFECTIVE DATE:** December 20, 2022  
**REPORTING TYPE:** Regular

Dear Mr. Medved:

The Ethics Commission has received the document referenced above appointing you as the committee's campaign treasurer. Please use the committee's Ethics Commission Filer ID number on all correspondence and documents that you submit to the Ethics Commission.

**Reporting Requirements:** You must file semiannual reports with the Ethics Commission not later than January 15 and July 15 of each year. *These reports must be filed even if there was no activity during the reporting period.* Other reports are required in connection with elections. You should review the appropriate Ethics Commission campaign finance guide and filing schedule for more detailed information about filing requirements.

**Late-Filing Penalties:** As the committee's campaign treasurer, you are personally responsible for filing the committee's reports and for any late-filing penalties in connection with the committee's reports. The late-filing penalty for most reports is \$500. For a report due eight days before an election and for the first semiannual report required to be filed after a primary election or after a general election, the late-filing penalty is \$500 for the first day the report is late and \$100 for each day thereafter that the report is late.

**Electronic Filing Requirement:** A committee who files with the Ethics Commission is required to file campaign finance reports electronically unless the committee is eligible for an exemption from that requirement. To file electronically we must first receive the FORM SECURITY-CF. It will provide us with an email address to which we will send a link to obtain password access.

**We have received** your Form Security-CF where you provided us with an email address. That email has now been entered into our system. The email will set you up to receive notices regarding filing deadlines, notices of importance, as well as provide you with a link for password access. By the time you receive this letter you should have received an email from the Ethics Commission with your link for password access. If you have not received this email, or if you experience any difficulties, please contact us at the number listed on the front page of this letter.

Visit our website at <https://www.ethics.state.tx.us> for upcoming deadlines as well as announcements. We strive to keep you informed. Other information also for review on our website:

1. Learn about the software at <https://www.ethics.state.tx.us/filinginfo/ptycorp>.
2. Filing Schedules: *Use the applicable filing schedule to determine when you will be required to file reports. Although the Ethics Commission may send notices to remind you of certain filing deadlines, it is your responsibility to make sure you file all required reports.*
3. Political Advertising Guide: *Review this guide to help you understand certain laws relating to political advertising.*
4. Campaign Finance Guide for Political Committees: *Review this guide to help you understand the restrictions and filing requirements in the campaign finance law.*
5. Campaign Finance Guide for Political Parties: *Review this guide to help you understand the special rules that apply to political party political committees.*
6. Qualified Paper Filers: The forms and instructions you may need are available on the Ethics Commission's website at <https://www.ethics.state.tx.us/forms/PTYindex.php>.

**Notice to Campaign Treasurers of Political Committees:** The campaign treasurer of a political committee is individually responsible for filing reports and for any penalties for late filing or failure to file. A new campaign treasurer does not assume responsibility for a previous campaign treasurer's reporting obligations or for penalties incurred by a previous campaign treasurer. A political committee may use political committee funds to pay a late fine assessed against a current or former campaign treasurer.

**NOTE:** *You will be required to file reports until your position as campaign treasurer ends. Your position as campaign treasurer ends when one of the following occurs:*

- *You file a campaign finance report designated as a "Dissolution Report" with a "Political Committee Affidavit of Dissolution;"*
- *You submit a written notice to the Texas Ethics Commission that you are resigning as treasurer; or*
- *Another person is appointed to replace you as campaign treasurer.*

*If your position as campaign treasurer ends, you will be required to file a campaign finance report designated as a "Termination Report" within 10 days. However, if your campaign treasurer appointment ends on the last day of a reporting period, no separate termination report is required. For additional information regarding the requirements to file, please see the Ethics Commission's "Campaign Finance Guide for Political Committees," on our website at <https://www.ethics.state.tx.us/filinginfo/ptycorp/>.*

**From:** [Bryan Christ](#)  
**To:** [treasappoint](#)  
**Cc:** [Eric Opiela](#); [Mike Medved](#)  
**Subject:** Re: DRAFT - 00083126 - Treasurer Appointment for Montgomery county republican party  
**Date:** Wednesday, December 21, 2022 12:42:37 PM

---

Adrian,

I assume the reset question is directed toward Mike... correct?

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Disclosure Filings Division

Texas Ethics Commission

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---

Yes, as he would be the current treasurer.

Mike: if you already know the password then you can just sign in with the filer id and the password and you're good to go—no need to worry about updating the password. However if your past treasurer is out of the picture and can't give it to you then I would certainly reset.

AIDAN

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Bryan Christ  
MCRP Chairman

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Bryan Christ  
MCRP Chairman



**No. 23-0127**

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**In the Supreme Court of Texas,  
Austin, Texas**

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In Re:

The MoCo Precinct Chair Group, et al.,  
Relators.

---

**Petition for Writ of Mandamus  
Appendix IV**

IV. Declarations of Non-Party Witnesses

Exhibit 68. Lisa Railey

Exhibit 69. Bob Bagley

Exhibit 70. Bill Graff (videographer)

Exhibit 71. Pat Tibbs

DECLARATION

(TEX. CIV. PRAC. & REM. CODE § 132.001)

My name is Lisa Railey; my date of birth is [REDACTED] and my address is [REDACTED]

[REDACTED]. I declare under penalty of perjury that the following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary. I was a delegate to the 2022 Republican Party of Texas State Convention.
2. I am a member of the Communication Committee of the Montgomery County Republican Party County Executive Committee (CEC). I am not a Precinct Chair, but serve as a volunteer member of the committee.
3. I worked with the Communication Committee and the Victory 2022 Committee to create a new website for the Montgomery County Republican Party. The new website focuses on educating voters and provides CEC members the opportunity to post events, updates, news articles, and other content that is informative and educational. In the past, CEC members have been denied the opportunity to post events and other information on the old website. The new website went live during the October 4, 2022, CEC meeting and the CEC then voted to make the new website (mctxgop.org) the official website for the party and to defund the old website (mcrptx.org)<sup>1</sup>. The website is paid with the party credit card and the domains are registered to the party Treasurer, Charles Shirley.
4. Also at the October 4, 2022, CEC meeting, the CEC members voted to create a new newsletter for the Montgomery County Republican Party<sup>2</sup> that focuses on informing and educating voters by providing content relating to issues in Montgomery County and the Texas legislature.
5. I attended the October 12, 2022, Steering Committee Meeting where potential email platforms were discussed. Precinct 111 Chair Luis Pedraza presented research he had done on several email platforms. Discussion was held and Luis was asked to conduct additional research and report back to the committee. After this research, Luis recommended the CEC use Constant Contact for party emails. The Steering Committee agreed and purchased an account on October 16, 2022, using the party credit card<sup>3</sup>. The

<sup>1</sup> See Oct. 2022 CEC meeting minutes.

<https://drive.google.com/drive/folders/1gsxBAWv-3iAM0r2ICADUB8e0sbXpmJ7Q> (last accessed on January 22, 2023).

<sup>2</sup> See Oct. 2022 CEC meeting minutes.

<https://drive.google.com/drive/folders/1gsxBAWv-3iAM0r2ICADUB8e0sbXpmJ7Q> (last accessed on January 22, 2023).

<sup>3</sup> See Attachment 1 - CC Payment Receipt for October 16.

Constant Contact account is owned by the party Treasurer, Charles Shirley.

6. I worked with the Communication Committee and the Steering Committee to create the new newsletter. Steering Committee member Robert Walker and Precinct 98 Chair Stephanie Cox uploaded the email list owned by the party to Constant Contact. The first edition was sent to the email list on October 24, 2022.<sup>4</sup>

7. On January 3, 2023, I received an email from James Byers stating that he is the "Chairman of the Montgomery County Republican Party Rules Committee." The email was copied to County Chairman Bryan Christ and Raquel Lewis. The email insinuates that the CEC is not the lawful Montgomery County Republican Party, claims that the email list "was not built by persons actually subscribing to your newsletter," and goes on to state:

"At least now when we are asked who is sending out a newsletter claiming to be the "official" newsletter of the Montgomery County Republican Party, we can tell them - it's not the MCRP, it's Lisa Suzanne Railey."

This email implies that I am personally responsible for sending out a fraudulent newsletter, even though all meeting minutes are posted to the public mctxgop.org website, so Byers has access to the minutes showing that the newsletter was created by a unanimous vote of the CEC members.

8. As I was in Florida at the time, my husband replied to Byers' email, referring him to Vice Chairman Jon Bouche:

My wife is in Florida this week. The list and the account are owned by the party and registered to party officers, not my wife. There are multiple users on the account.

If you have questions about the party email list or anything else, I would advise you to contact Vice Chairman Jon Bouche and make sure you have correct facts before sharing them as you threaten to do below.

Sincerely,

Scott Railey

9. Byers replied to this email on January 11, 2023, stating that I (Lisa Railey) am the

---

<sup>4</sup> See newsletter archive.

<https://www.mctxgop.org/republican-reporter> (last accessed on January 22, 2023).



Editor and distributor of the "Freedom Caucus Newsletter, Reporter, and other notices they send, claiming they are the Montgomery County Republican Party (MCRP), a fraudulent claim." He goes on to state: "It's a free country, so Ms. Railey can write what she chooses. But when we get questions from recipients who are not subscribers, we will form them as above: it is not a MCRP email, and the Editor and Distributor is Ms. Railey."<sup>5</sup> These statements claim that I am generating fraudulent emails and sending them to people who are not subscribers, rather than sending them on behalf of the CEC to the party-owned email list. I did not reply to this email.

10. I am a volunteer with the sole motivation of educating voters in Montgomery County as a member of the CEC's Communication Committee. All communication vehicles used by the committee have been approved by the CEC by unanimous vote, and these votes are recorded in public minutes available to Byers, Christ, and Lewis at mctxgop.org. All communication content (website/newsletter articles and other content) is submitted by CEC committee members or CEC Steering Committee members, and is written, edited, and distributed by the Communication Committee as a team. It appears to me that these emails are meant to threaten or intimidate me, and to set a narrative that I am acting alone rather than working with the majority of duly elected precinct chairs on the CEC.

11. I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.

Executed in Montgomery County, State of Texas on January 23, 2023.

signed: Lisa Railey

printed name: Lisa Railey

---

<sup>5</sup> See email thread dated January 11, 2023, forwarded to John Wertz.



## Payment Receipt for October 16, 2022

Thank you for your recent payment. Your payment receipt is found below.

Attention: Charles Shirley

Montgomery County Republican Party of Texas

310 Metcalf St.

Conroe, TX 77301

US

7133980036

**User Name:** slrailey@protonmail.com

**Today's Date:** October 16, 2022

**Payment Date:** October 16, 2022

**Payment Method:** VI (last 4 digits: 9039)

**Amount:** \$85.28

Thank you for your payment!

Amounts shown may reflect sales tax which is applicable in certain areas.

You can view payment receipts at any time in the Billing tab of your account.

*Important Notice: To help maintain Constant Contact's strong sending reputation, we have implemented a monthly email send allowance and overage fee if the allowance is exceeded. This charge will be reflected on your next invoice, if you exceed the allowance. While most of our customers won't be impacted, [click here](#) to learn more.*

We appreciate your business.

Best Regards,

Constant Contact Billing

1601 Trapelo Road, Suite 329 - Waltham, MA 02451

Questions? [Please give us a call!](#)

US / Canada Toll Free: (855) 229-5506

UK Toll Free: 0808-234-0942

Outside US / Canada: 0808-234-0945

Need to cancel your account? [Just give us a call!](#)

US / Canada Toll Free: 855-229-5506

UK Toll Free: 0808-234-0945

Outside US / Canada: +1 781-472-8120

Please do not reply to this email, as the reply address does not go to a monitored mailbox. If you have additional questions, please visit our Help Center at

<https://www.constantcontact.com/help>.

©2022 Constant Contact



**DECLARATION**

(TEX. CIV. PRAC. & REM. CODE § 132.001)

My name is Bob Bagley, my date of birth is [REDACTED], my address is [REDACTED]  
[REDACTED], and I declare under penalty of perjury that the following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary.
2. I have been personally present at events concerning a division of the Montgomery County Republican Party Executive Committee ("CEC"), and write this declaration in support of legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC's orderly participation in county elections, as I am aware that Bryan Christ, the elected Montgomery County Republican Party Chair, is not accurately recognizing properly seated chairs or managing the CEC's resources, such as the space leased by the Montgomery County Republican party, its bank account, and its website.
3. While I do not hold the position of Republican Precinct Chair in Montgomery County, I have been present at CECs when Precinct Chairs were appointed by a majority of Precincts Chairs attending those meetings, after a quorum was obtained. The information from those meetings was passed on to the County Chairman, whom failed to attend some of the meetings, which were legally announced. The names of these newly appointed Precinct Chairs were not sent to the Secretary Of State by the County Chairman, as required by law.
4. I have obtained a copy of the list of precinct chairs given by Bryan Christ to the Texas Secretary of State, and learned that Christ has refused to recognize those appointments. I am aware that Christ's failure to list those properly appointed, is a violation of his ministerial duties described at section [172.118](#) of the Texas Election Code.
5. I have been a long-time activist in the Republican Party. I am aware that dueling sets of precinct chairmen will cause difficulties as the election draws near. Additionally, precinct chair lists are public information (see section 172.029(5)b of the Texas Election Code). I am aware that candidates depend on these lists.
6. Additionally, precinct conventions are historically run by precinct chairs or their agents and allies. If this matter is not resolved, we may well have competing claims and disputes about which precinct convention held for a precinct is valid.



7. I was provided a copy of Pct. Chair 24 James Byers Collusion email (via the RPT Rule 8M complaint) that he sent prior to the Organizational Meeting to Chairman Christ and his selected parliamentarian to coordinate hijacking of the July 19th meeting. This email laid out the process of the meeting, thereby predetermining the outcome and disfranchising public debate, my vote and the will of the body.

8. During the July 19th meeting when voting on the amended agenda prior to the vote Mr. Byers "calls for division" (44 minutes and 6 seconds [in the video](#)). After deliberation with the parliamentarian, the chairman ruled that it was division of the question (44 minutes and 40 seconds [in the video](#)) and therefore every point on the agenda must be voted on separately. The call for division was clearly a call for the division of the assembly (vote), not division of the question. The Chairman made decisions to be dilatory and to unnecessarily extend the meeting in an effort to frustrate the process.

9. The amended agenda, by the conservative majority, for the July 19th meeting was approved (47 for to 31 against, at the [1hr 19min mark of the video](#)). The last item on the agenda was that the meeting will "adjourn at the completion of the agenda"(RONR 21:3). Mr. Fred Sunderman motioned for an adjournment (meaning a recess) "until the two sides can work it out". The chairman got a second and it quickly went to a voice vote without the chairman articulating the motion to adjourn.

10. Upon saying we were adjourned, at least two precinct chairs asked for division of the vote. The chairman ignored them(violating RONR 21:12). The voice vote was questionable if even it made a majority, much less 2/3rds that he claims. In this instance it would have required a 2/3 vote to amend the adopted agenda (adjournment (RONR 41:63)).

11. In the 7/23 reconvening Organizational meeting, the chairman wanted to vote on a "preferred" agenda (of two) prior to the start of the meeting. This was out of order since the conservative (amended) agenda had been adopted on July 19, 2022 (see No. 9 above). After this meeting was started the chairman refused to chair the reconvened meeting ([TEC 171.022\(a\)1](#)) - subsequently the body removed him via RONR 62:10.

12. I have also seen a call for a specially called meeting on August 13, 2022, issued by Christ. According to Art. VI, Section 2 of the [CEC's 2020 Bylaws](#), special meetings must have a list of precinct chairs who are supporting that call which equals 20% of the total membership (not including vacancies). He did not reach that threshold (only 19 of 97).

13. Statutory required failure to report multiple (16) precinct chairs on time to



Secretary of State from the 5/24/22 election, as well as 13 others that were seated thereafter on 7/23/22 and 8/13/22 ([TEC 172.118](#)), potentially hindering our November GOTV effort.

14. Statutory required failure to report resigned precinct chair (72 - Ann Kate) and allowing her to participate in voting and counting her in calls for special meetings.

15. Purposely scheduling dual meetings 3 times, on top of already properly noticed meetings, at same date & time, assuring conflict, confusion & division (especially amongst new chairs), dividing everyone's loyalties, time and effort (RONR 8:2.1).

16. Improperly noticed online meetings by his precinct chairs (should be the chairman - [RPT rule 8J](#)).

17. Neither proper credentials nor instructions were included (7/25/22 & 9/1/22) and meetings were rigged to control the outcome in disallowing open participation by muting everyone's mic, nor providing properly required transparent business protocol or simultaneous documentation during zoom meeting ([RPT Rule 8j](#) and RONR 9:36). Also, on 7/25 he refused to accept some motions. In addition, he kept members in the waiting room (8/31), not allowing participation in the zoom meeting. His failure to send to the CEC the meeting minutes and post to the website in accordance with bylaws has caused confusion by not having the record of the business that occurred and to be taken up at (future) meetings.

18. He's prevented conservative leadership access to HQ and to the website, stifling GOTV.

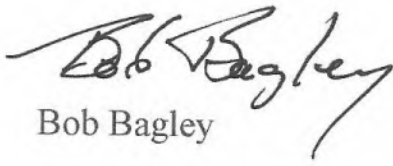
19. Aside from the challenges of disputed precinct chair lists, Christ is refusing to allow access to CEC resources and meeting space and claiming to fill precinct chair vacancies through a committee of his 30+ supporting precinct chairs, which is not close to a majority of the CEC; all these appointments appear to be invalid to me.

20. As I have watched the division in the CEC, it appears that about one-third of the precinct chairs support Christ, and two-thirds are opposed to his leadership actions. The result of his lack of leadership and support means that none of his meetings can appoint a person to a vacant precinct chair, as such votes require a one-third quorum of the CEC. His divisive approach resulted in a RPT Rule M complaint signed by a majority of the CEC on August 15, 2022, along with a vote of no confidence on January 3, 2023.

I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.



Executed in Montgomery County, State of Texas on August 9, 2023.

A handwritten signature in black ink, appearing to read "Bob Bagley". The signature is stylized with a large, sweeping "B" and a long, trailing flourish.

Bob Bagley

Committeeman, Montgomery County Republican Party

Vice Chairman, Montgomery County Eagle Forum

Board Member, Montgomery County Tea Party PAC

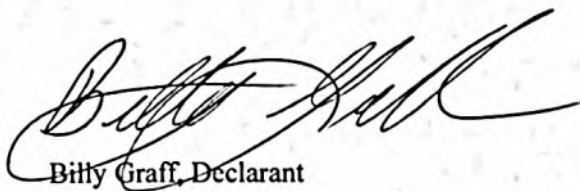
Former Vice Chairman, Montgomery County Hospital District

**DECLARATION FOR AUTHENTICATION OF BUSINESS RECORDS**

My name is Billy Graff, my date of birth is [REDACTED] and my address is [REDACTED]. I declare under penalty of perjury that the following statements are within my personal knowledge and true and correct.

1. I make this declaration to assist those seeking to resolve the existing schism in the Montgomery County Republican Party Executive Committee ("CEC").
2. Over time, I have become what I believe to be a trusted if unofficial videographer of CEC proceedings. In the last two years, I have been a consistent presence at the CEC meetings, recording the meetings and keeping them unedited for use by all interested parties.
3. I have been the custodian of these video records, including many meetings that are part of the present schism in the CEC, which I would characterize as the Christ/Byers faction, and the Precinct Chair faction. I have recorded all meetings that I could, missing only those that occurred when the Christ/Byers faction scheduled a meeting at the same time as the Precinct Group first scheduled theirs.
4. As the custodian of these records, I am familiar with the manner in which they are created and maintained. I have not edited these recordings in any way; they are the true recorded video.
5. I have kept these videos and posted them publicly on youtube.com, though one must have the link in order to access them. A public person simply searching for them will not find them.
6. I have made these records and posted them at or near the time of each act or event set forth in these videos, typically either immediately or within a few days of the meeting.
7. I keep these records in the course of regularly conducted business activity, as it is my regular practice as a member of the community of Republican activists to keep such records.
8. In providing this declaration, I am taking no side in the dispute, but herein simply provide assurance that the videos are unedited and available for those involved and the Court's use. I have provided a list of these videos post-signature as an attached exhibit.
9. ANY OTHER COMMENT YOU WANT TO MAKE.

Executed in Montgomery County, State of Texas, on February 13, 2023.



Billy Graff, Declarant

**EXHIBIT: VIDEO RECORDS OF CLAIMED EXECUTIVE MEETINGS**

1. July 19, 2022 (all chairs): <https://youtu.be/zBMEzhhblycA>
2. July 23, 2022 Org. Mtg. Cont. (All, then Precinct Chair Group): <https://youtu.be/k-sdj-oDqqS>
3. July 25, 2022 (All by Zoom): <https://youtu.be/WPA9jjpn3Zo>
4. August, 13, 2022 (Christ Group): <https://youtu.be/wjEi7gVTKXU>
5. September 6, 2022 (Christ Group) - [https://youtu.be/7ofWrb\\_M7l4](https://youtu.be/7ofWrb_M7l4)
6. December 6, 2022 (All then Precinct Chair Group) - <https://youtu.be/xqLKmflhAK8>
7. December 6, 2022 #2 (All then Precinct Chair Group) - <https://youtu.be/xqLKmflhAK8>

<<< END LIST >>>

**DECLARATION**

(TEX. CIV. PRAC. & REM. CODE § 132.001)

My name is Paricia Tibbs; my date of birth is [REDACTED] and my address is [REDACTED]  
[REDACTED] I declare under penalty of perjury that the following statements are true and correct:

1. I am a resident of Montgomery County and voted in the 2022 Republican Primary.
2. I have been personally present at events concerning a division of the Montgomery County Republican Party Executive Committee (“CEC”), and write this declaration in support of necessary legal action to resolve the division. As the CEC has duties concerning elections, I believe that this division imperils the CEC’s orderly participation in county elections, as I am aware that Bryan Christ, the elected Montgomery County Republican Party Chair, is not accurately recognizing properly seated chairs or managing the CEC’s resources, such as the space leased by the Montgomery County Republican party, its bank account, and its website.
3. I have been active in the Montgomery County Republican Party for many years and have been on several party committees. I am also active in other conservative groups such as Eagle Forum and am president of the Montgomery County Tea Party.
4. I am aware of the 7/14 email from Precinct 24 Chairman James Byers to Chairman Bryan Christ. This email outlined an orchestrated conspiracy to illegally control the July 19 CEC meeting by literally “scheduling” the recognition of PC Byers to the exclusion of other precinct chairs with different opinions. Had that ploy not been discovered I and fellow constituents would have been disenfranchised.
5. I was in attendance at the July 19, 2022 Organizational Meeting. At that meeting the CEC adopted an amended agenda that required completion of all items on the agenda before the meeting could be adjourned. After several contentious hours Precinct 88 Chairman Fred Sunderman motioned for an adjournment until the interested parties could schedule another meeting to complete the Organizational Meeting. Chairman Christ arbitrarily declared the motion “passed” and the meeting “adjourned” despite numerous and vocal calls for Division and Appeal.
6. I was also in attendance at the July 23, 2022 continuation of the Organizational Meeting. Despite the fact that the amended agenda had been adopted at the July 19 meeting Chairman Christ openly attempted to manipulate the meeting to use some different agenda. Chairman Christ was repeatedly asked to Chair the Called meeting.

He could simply have accepted the gavel and proceeded with the meeting. Instead, he attempted to call the meeting “at ease” and “invalid” and he eventually abandoned the chair. The remainder of this meeting was very peaceful and successful and our officers and precinct chairs were elected as required.

7. A CEC Zoom meeting called for July 25<sup>th</sup> by Becky Vance and a group of Precinct Chairs. At that meeting, the chairman silenced everyone’s mics. They accepted our newly appointed Precinct Chairs into the meeting & called their names during roll call. The meeting was extremely frustrating and people were not being counted present that were physically there where many of us gathered at the HQ, people were left in the waiting room, some couldn’t connect with their devices, members were kicked off, motions were ignored or denied. We had votes on motions for adjournment resulting in inaccurate votes counts. When we questioned the vote totals, the numbers kept changing. We then realized they were taking out the newly appointed chairs votes even though they had called their names during roll call and swore them in that evening. The zoom meeting protocol as specified in RPT 8.J. was not followed as we were not able to view the results in real time to ascertain that each persons’ vote was counted. Additionally, the Chairman did not secure a Parliamentarian that evening which was discovered towards the end of the evening. Finally, the Chairman suddenly announced the meeting was adjourned after 4 hours and twenty minutes with nothing being accomplished.

8. On July 30, 2022 at 8:52 am my husband, Precinct 76 Chairman Dennis Tibbs, called for an Emergency Meeting for 9 am on August 13, 2022 (Tibbs meeting). Chairman Christ did forward the notice to all precinct chairs at 9:47 pm on July 30, 2022. He also forwarded a notice of a conflicting CEC meeting called by Precinct 24 Chairman James Byers. The Byers meeting was called much later and failed to include the names of the required 20% of the precinct chairs (MCRP Bylaws Art. VI, Sect. 2). At the (Tibbs meeting), August 13, 2022, there was a quorum and an attendance of, at lease, 49 precinct chairs (of 97). The Byers meeting call included names of 19 precinct chairs and was thus not a valid meeting. Any action taken at and from that meeting thereafter was not valid.

9. On September 8, 2022 Chairman Christ claimed, in an email, that there were 13 precinct chair vacancies, as well as other officer vacancies, that had not been filled because of his “challenge” in meeting the quorum threshold. In fact, all precinct chair vacancies had been filled at the 8/13/22 CEC meeting and all 111 precincts had a chairman that had been elected in the Republican primary or elected by the majority of the CEC. This is another violation of section 172.118 of the Texas Election Code.

10. Chairman Christ or his illegitimate Steering Committee (appointed at their illegitimate 8/13/22), meeting has called for multiple meetings claiming required

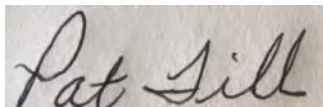
precinct chairs and claiming to have a quorum for such meetings. The claimed quorum is based on his appointment of “allies” to positions that are already occupied! The actions of these meetings and positions filled at these meeting are not valid because those voting are not legitimate precinct chairs.

11. As a long-time activist in the Republican Party I believe that dueling sets of precinct chairmen will cause great difficulties for future Precinct Conventions, Senatorial Conventions and State Conventions. This will also lead to confusion for candidates and their campaigns as precinct chair lists are public information (see section 172.029(b) of the Texas Election Code).

12. As I have watched the division in the CEC, it appears that about one-third of the precinct chairs support Christ, and two-thirds are opposed to his leadership actions. The result of his lack of support means that none of his meetings can appoint a person to a vacant precinct chair, as such votes require a one-third quorum of the CEC. His divisive approach resulted in a complaint signed by a majority of the CEC in late 2022, along with a vote of no confidence.

13. I have employed Warren V. Norred of Norred Law, PLLC to resolve the CEC division and have contributed to funds to pay for him and his firm for that purpose.

Executed, remotely, in Montgomery County, State of Texas on February 3, 2023.

A handwritten signature in cursive script that reads "Pat Tibbs". The signature is written in dark ink on a light-colored, slightly textured background.

Printed name: Pat Tibbs

### **Automated Certificate of eService**

This automated certificate of service was created by the eFiling system.  
The filer served this document via email generated by the eFiling system  
on the date and to the persons listed below:

Warren Norred on behalf of Warren Norred  
Bar No. 24045094  
wnorred@norredlaw.com  
Envelope ID: 72946641  
Status as of 2/21/2023 12:31 PM CST

Associated Case Party: MoCo Precinct Chair Group

Name	BarNumber	Email	TimestampSubmitted	Status
Norred Law, PLLC		court@norredlaw.com	2/21/2023 11:39:44 AM	SENT

Associated Case Party: John Wertz

Name	BarNumber	Email	TimestampSubmitted	Status
Warren Norred		wnorred@norredlaw.com	2/21/2023 11:39:44 AM	SENT

Associated Case Party: Gwen Withrow

Name	BarNumber	Email	TimestampSubmitted	Status
Warren Norred		wnorred@norredlaw.com	2/21/2023 11:39:44 AM	SENT