

## **DECLARATION OF ALLISON WINTER**

My name is Allison Winter; my date of birth is December 31, 1956; and my address is 31 Day Lily Place, The Woodlands, TX 77381. 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

APR 25 2022

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.

PCT	NAME	DATE APPOINTED	OCCUPATION	ADDRESS
26	CALEB SMITH	8/13/22	MAINTENANCE DIRECTOR	17328 SYCAMORE TRAIL, CONROE, TX 77302
54	BOBBI BODENHAMER	8/13/22	DIRECTOR OF OPERATIONS	20130 ROADWAY, NEW CANEY, TX 77357
62	JENNIFER BOWLING	8/13/22	DOMESTIC ENGINEER	2 GREY FINCH CT, THE WOODLANDS, TX 77381
80	STEVEN FOSTER	8/13/22	SALES REPRESENTATIVE	31007 KINGSWAY PARK LANE, SPRING, TX 77386
95	SHERRY TAVEL	8/13/22	ATTORNEY	27105 CROWN CHASE DR, NEW CANEY, TX 77357
101	STEPHANIE SCHWANTES	8/13/22	HOMEMAKER	150 CEZANNE WOODS PLACE, THE WOODLANDS, TX 77382
107	JACKIE WILLIAMS	8/13/22	RETIRED	33222 KATY LEE LN, MAGNOLIA, TX 77354
111	PATRICK TEICH	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.



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

Inbox



James Byers [byersjt@yahoo.com](mailto:byersjt@yahoo.com) Thu, Jul 28, 2022, 12:35 AM

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.

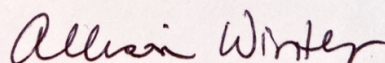
34. Christ has denied our access to the party website to post upcoming committee meetings, committee minutes, or to post vacancies and appointed precinct chairs.

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 handwritten signature in dark ink, reading "Allison Winter", is written over a light pink rectangular background.

Allison Winter