



Sarah Dunklin &lt;sarahedunklin@gmail.com&gt;

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## Rules Review Complaint

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**Jennifer Lancaster** <jennifer@thelancasterlawfirm.com>

Wed, Sep 25, 2024 at 5:27 PM

To: Joseph Wood <joseph@arkansasgop.org>, Seth Mays <seth@arkansasgop.org>, Bilenda Harris-Ritter <Bilenda@aol.com>

Cc: Sarah Dunklin <sarahedunklin@gmail.com>

Mr. Chairman,

I am aware of a Rules Review Complaint that has been filed against me. At the outset, I unequivocally deny the salacious allegations in this false and baseless review request.

I ask that you rescind the formation of the rules review committee because the complaint is defective for three reasons.

First, Article III, § 8 and Article VII, § 1(A) requires that a rules review request be signed by one fifth of the district committee. The document provided to me has no signatures. As such, it is defective on its face because of the lack of signatures. Additionally, our rules do not permit anonymous review requests.

Second, I have seen the signatures of those who have signed as the list was provided to me by third parties. The vast majority of the signatures are from members of the First District. There are not near enough signatures from Second District members to file a valid complaint. The rules state that any complaint against a District Member must be signed and submitted by members within the district in which they are a member.

There is no mechanism by which the members of the First District can seek review of the actions of the Second District as cross district complaints are neither contemplated nor permissible by our rules.

Finally, it has come to my attention that the justification of fear of retaliation is being used, likely due to the fact that there are insufficient signatures to file a valid complaint. It's curious that those who signed did not fear retaliation while the complaint was being circulated with their signatures. It appears the fear only arose when it was time to file the complaint. This is again further evidence that the complaint lacks the requisite number of valid signatures, and this excuse is nothing more than a tactic to hide the fact that there are insufficient signatures. Furthermore, it is widely known within the Second District that Ms. Dunklin and her supporters were unable to gather the required signatures to proceed with this complaint from the Second District.

The claim that those who signed the complaint fear retaliation from me is baseless, particularly considering that the same individuals have actively engaged in a campaign to damage my reputation. This includes the creation of a website dedicated to defaming me, the production of edited videos attacking me, and the expenditure of significant funds to distribute defamatory text messages. While there have been allegations of retaliation on my part, no evidence supports

these claims, nor will any ever emerge, as no such actions have occurred.

That being said, from my review of what has been purported to be the signatures to this complaint, there is significantly less than 1/5 of the active members of the Second District and the complaint is lodged against me in my role as the chair of the Second District. It lacks sufficient signatures and should not have been filed.

It is for these reasons that I ask you to recall the rules review committee and dismiss the complaint.

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Jennifer M. Lancaster  
Partner, Attorney at Law

**LANCASTER & LANCASTER  
LAW FIRM, PLLC**

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**\*\*\*\*IMPORTANT: This communication contains information which may be confidential and privileged attorney-client communications. If it appears that this communication was addressed or sent to you in error, you may not use or copy this communication or any information contained therein, and you may not disclose this communication or the information contained therein to anyone else. If you have received this electronic mail transmission in error, please delete it from your system without copying it, and notify me immediately by reply email or by calling (501) 776-2224.**



Sarah Dunklin &lt;sarahedunklin@gmail.com&gt;

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## Rules Review Complaint

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**Sarah Dunklin** <sarahedunklin@gmail.com>

Thu, Sep 26, 2024 at 5:16 PM

To: Jennifer Lancaster &lt;jennifer@thelancasterlawfirm.com&gt;

Cc: Joseph Wood &lt;joseph@arkansasgop.org&gt;, "Clinton W. Lancaster" &lt;clint@thelancasterlawfirm.com&gt;

Ms. Lancaster:

Chairman Wood and I received and reviewed your email. The Rules Review will proceed.

Sarah Dunklin  
Rules Review Committee Chair  
Republican Party of Arkansas

### RPA Rules Article VII Section 1 – Request for Review

- A. Members of a County or District Committee may file a "Request for Review" with the State Chairman if there is evidence of a failure, within the County or District Committee, to observe these rules and/or local rules of the County or District Committee. A "Request for Review" may be filed if signed by not less than one-fifth (1/5) of the active membership of the County or District Committee, provided that in no instance shall a "Request for Review" be filed by less than five (5) members.
- B. The "Request for Review" shall be filed, in writing, with the State Party Chairman by U.S. Mail or email. The State Party Chairman shall appoint a Review Committee within 15 days of receipt of the "Request for Review" to include the following:
  1. The District Chairman for the district in which the County from which the request was received is located. The District Chairman shall serve as Chairman of the Review Committee. If the request comes from a District Committee, the State Chairman shall appoint another District Chairman to serve in this capacity.
  2. The District Representative to the State Executive Committee representing the district in which the County from which the request was received is located. If the request comes from a District Committee, the State Chairman shall appoint another District Representative to serve in this capacity.
  3. At least one other member of the State Executive Committee.
  4. Chairman of the State Party Rules Committee
  5. One County Chairman from a County outside the District from which the request was received appointed by the State Chairman.
  6. A Republican Party of Arkansas staff member as appointed by the State Chairman shall serve as the non-voting secretary of the Review Committee.
- C. The Review Committee shall investigate the matter referred, review appropriate documents, receive and review written representations from the parties involved in the dispute. The Review Committee shall hold hearings with members of the County or District Committee, if it deems necessary, within thirty (30) days of the appointment of the Review Committee. Any hearing should be held at the regular meeting place of the County Committee or at a convenient meeting place within the county at a time that would permit interested parties to attend. For a request from a District Committee the hearing should be held at the State Party headquarters.
- D. The Review Committee shall make a written report to members of the State Executive Committee, with findings and recommendations, within twenty (20) days after the date of the hearing with members of the County or District Committee or within forty-five (45) days after the date of the appointment of the Review Committee if no hearing is held.
- E. At the next meeting of the State Executive Committee, following receipt of the Review Committee Report, and with no less than ten (10) days notice being provided to the interested parties, the Chairman of the Review Committee shall make a verbal report to the State Executive Committee. A representative from each side of the issue(s) considered by the Review Committee will be permitted to make a five (5) minute presentation to the State Executive Committee. Representatives may provide a written summary prior to

the convening of the State Executive Committee Meeting.

- F. The State Executive Committee shall consider all reports and presentations and take appropriate action upon a majority vote. The decision of the State Executive Committee may include, but is not limited to, the removal of a County or District Chairman, the removal of a County Committee Member, the loss of County Committee votes on the District or State Committee or at the State Convention, or the declared vacancy of a County Committee.

[Quoted text hidden]

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

From: **Sarah Dunklin** <sarahedunklin@gmail.com>  
Date: Tue, Sep 24, 2024 at 6:59 PM  
Subject: Article VII Rules Review-Lancaster  
To: Jennifer Lancaster <jennifer@thelancasterlawfirm.com>  
Cc: Clinton W. Lancaster <clint@thelancasterlawfirm.com>

Ms. Lancaster:

The attached complaint has been submitted to the State Party, and the Rules Review Committee has been appointed. The written representations referenced in RPA Rules Article VII Section 1 C are due by email Friday, September 27th no later than 5:00 pm. RPA Rules Article VII Section 1 is below for your reference.

Thank You,

Sarah Dunklin  
Rules Review Committee Chairman  
Republican Party of Arkansas

cc: Rules Review Committee

**RPA Rules Article VII Section 1 – Request for Review**

- A. Members of a County or District Committee may file a "Request for Review" with the State Chairman if there is evidence of a failure, within the County or District Committee, to observe these rules and/or local rules of the County or District Committee. A "Request for Review" may be filed if signed by not less than one-fifth (1/5) of the active membership of the County or District Committee, provided that in no instance shall a "Request for Review" be filed by less than five (5) members.
- B. The "Request for Review" shall be filed, in writing, with the State Party Chairman by U.S. Mail or email. The State Party Chairman shall appoint a Review Committee within 15 days of receipt of the "Request for Review" to include the following:
1. The District Chairman for the district in which the County from which the request was received is located. The District Chairman shall serve as Chairman of the Review Committee. If the request comes from a District Committee, the State Chairman shall appoint another District Chairman to serve in this capacity.
  2. The District Representative to the State Executive Committee representing the district in which the County from which the request was received is located. If the request comes from a District Committee, the State Chairman shall appoint another District Representative to serve in this capacity.
  3. At least one other member of the State Executive Committee.
  4. Chairman of the State Party Rules Committee
  5. One County Chairman from a County outside the District from which the request was received appointed by the State Chairman.
  6. A Republican Party of Arkansas staff member as appointed by the State Chairman shall serve as the non-voting secretary of the Review Committee.
- C. The Review Committee shall investigate the matter referred, review appropriate documents, receive and review written representations from the parties involved in the dispute. The Review Committee shall hold hearings with members of the County or District Committee, if it deems necessary, within thirty (30) days of the appointment of the Review Committee. Any hearing should

be held at the regular meeting place of the County Committee or at a convenient meeting place within the county at a time that would permit interested parties to attend. For a request from a District Committee the hearing should be held at the State Party headquarters.

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- F. The State Executive Committee shall consider all reports and presentations and take appropriate action upon a majority vote. The decision of the State Executive Committee may include, but is not limited to, the removal of a County or District Chairman, the removal of a County Committee Member, the loss of County Committee votes on the District or State Committee or at the State Convention, or the declared vacancy of a County Committee.

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## 2 attachments



**RPA Rules Review 2nd District 9-10-24.pdf**

120K



**RPA Rules Review 2nd District Exhibits.pdf**

112K

To: Rules Review Committee

Your chair, Sarah Dunklin only gave me 72 hours during a work week to respond to this complaint. Also, the exhibits are blocked so I cannot access them to see what evidence has been created against me. Please forgive any typos or grammatical errors.

This complaint was filed in retaliation to my husband's complaint against the executive members of the Saline County Republican Committee. Sarah Dunklin has acknowledged the dishonest and divisive ways specific members of the Saline County Executive Committee, specifically the Gray family, has behaved but she said they're too valuable for her to address.

The members of the Gray family are all unemployed, they do not have any hobbies, and they are not involved in church. All their time is dedicated to political maneuvering. Sarah told me that she does not want to remove them because they are the only ones who will make flyers, send texts, and do whatever she asks when she asks.

My position is that Saline County Republican Committee members are subject to extreme bullying by its executive board members. Their behavior became worse after the RPA's Convention, presumably from feeling empowered after prevailing at the Convention. While I was warned that standing up to the Grays and the other members of the executive committee would jeopardize my position as Second District Chair and Convention Chair, I decided to move forward because I refuse to be silent when others are being bullied. You have witnessed examples of this bullying by the multiple texts the Grays have sent out with edited videos of me, of the multiple Facebook posts slandering me and now even this frivolous complaint. This is a small example of what they and the other members of the Saline County Executive Board have done to our members of the Saline County Republican Committee. Something must be done to stop the incessant bullying. I have done all I can. I support reorganizing the committee and starting fresh with a new executive board.

### **Allegation #1 – Risking State Convention Presidential Electors**

**Response to Issue #1.** This is not a violation of our rules as our rules do not require me to sign the certification. Furthermore, this matter is moot. The issue arose by many non-lawyers pretending they were lawyers because they can use Google. It includes Sarah Dunklin who did not understand the electors process and chose to engage in fear mongering instead of rational discussion. The RPA executive committee filled the elector vacancies on September 20 as allowed by statute.

See the **Attached Exhibit** for evidence that I tried to remedy the situation as quickly as possible.

The RPA's General Counsel, A.J. Kelly, has maintained and repeated as recently as September 20, 2024, that the certification filed on June 10<sup>th</sup> was sufficient. If that is the position of the RPA, it cannot find that I held up the certification of the electors.

To say that I was holding up the electors is a blatant lie. I was the one who did the research and discovered the RPA's error, brought it to the attention of the RNC, spoke to elite members of the Trump campaign who all agreed that what I proposed was reasonable and they could not understand why the RPA was refusing to work with me.

Any rational review of my actions reveals that I was not working against the interest of the party, but working to protect the electors. (See Exhibit #1 for email chain). You will notice that Sarah Dunklin was cc'd on one as I kept her informed of the discussions regarding the electors. She was in full support and it was her position that the electors needed to be expunged and re-elected.

Dunklin abruptly and without explanation changed her position on September 3<sup>rd</sup>. That is when the fear mongering and name calling towards me began.

## **Allegation #2 – Wrongful Credentialing Second District Committee:**

### Response #2

There is no process under our RPA rules for the First District to complain about how the Second District conducts its business. These district members were elected at a properly called meeting. The First District is complaining about membership of the Second District. This is clearly an attempt for the First District to control the business and activities in another district.

Again, Alison Gray, Saline County's State Committee Woman, one of the people against whom multiple complaints have been filed, was seen taking pictures of our members to corroborate this planned attack.

As to the validity of the special meetings, former Committee chairmen Doyle Webb and Ken Yang agreed that the special meetings were properly called. Many of the people complaining about not receiving notice were talking about the call on social media within hours of the call being issued. They are also openly hostile and go to great lengths to defame me. Please call Doyle Webb or Ken Yang for more information on the validity of the meetings.

Furthermore, the Saline County Secretary executive committee members did not appear at the meeting and therefore have no actual knowledge of who voted.

## **Allegation #3 – Personal Attacks Against Committee Members**

### Response #3

This complaint was written by party members not only outside the Saline County Committee but outside the Second District. The lack of accurate facts and knowledge is a basis for why those from an outside district are not permitted by our rules to challenge the workings of a different District. The accusation that I personally attack anyone is a lie and there is no evidence provided to substantiate it.

3(a) After succeeding at the convention, members of our Saline County Executive Committee became very prideful. At the county committee meeting following the convention, the Saline County Executive Committee recommended removing 33 Saline County members most of whom are elected officials and those the executive committee members labeled “RINOs.” (See the list of those the executive committee wished to remove and how they were labeled by our chairman.) The executive team members not only failed to include this item on the agenda for the meeting, they did not notify the 33 members that they were facing removal. Alison Gray made a motion for a flexible agenda and the the executive team members proceeded to tell the body that if they did not vote to remove the 33 members, they would be violating the rules.

I spoke against the Executive Committee’s recommendation to remove the 33 members from our rolls citing the rules do not require us to adopt the executive committee’s recommendation and that the individuals facing removal were not notified of the body’s consideration for removal. Most of our members agreed with me. (See Exhibit with minutes from the meeting.)

Members of the executive committee, beginning with Scott Gray immediately began attacking me for speaking against their attempt at removal. Scott Gray, in front of many people after the meeting called me and those who agreed with me “milquetoasters” and claimed that because we did not vote with his recommendation for removal, he was no longer going to buy the Saline County Committee members a building as the Saline County members were facing eviction from Doyle Webb. (See exhibits ).

The attacks did not stop after the meeting. They continued the following morning through personal texts and Facebook messenger. (See Exhibit from Rena Allmond)

It is no secret that for more than a year, Saline County has been subject to a great deal of controversy and chaos. Most of this chaos has been purposefully created by the Gray family. Scott Gray has claimed that the chaos, including orchestrating votes of “no confidence” in Senators Boozeman and Cotton, was done solely for marketing, which he prides himself on doing.



**Allegation 3(b)** There is no evidence that I did any of the accused allegations. Even if the allegations in 3(b) were true, there is no rule that prohibits private conversations among members. However, the allegation in 3(b) is not true. See Exhibits including statements from the 2 other people on the call. This allegation was made by former Treasurer Thomas Harper. When the Grays published this accusation on their website, Thomas Harper immediately called me to apologize. He said that the Grays embellished what he said, that he asked them to take it down because it was not accurate but they refused to take it down from their website.

**Allegation 3(c)** The allegation that I was “incensed” about being called a narcissist is inaccurate. The issue that led to the chairman calling me this name began when he and other members of the executive committee attempted to remove more than thirty-three members (mostly elected officials and “RINOs” as the executive committee referred to them) from our committee without affording the affected members any notice. (See Exhibit for a list of the proposed removal that was provided to me by the chairman). You will see that most are elected officials and “RINOs” as labeled by the executive members. Please note that I have not made a motion to remove or censure anyone.

The decision arose when select members of the SCRC executive committee intentionally failed to notify all the members of the executive committee about the meeting to ensure it had the votes to pass favorably out of the executive committee. They also did not include the vote for removal on our committee meeting’s agenda and they did not notify the elected officials and others of the fact that they were being considered for removal.

Nonetheless, I had a private conversation with chairman Frank Curtis that night, the following morning, and by text. During all those conversations, I told him that he would have to lead, he should not be allowing the name calling and division in our county committee, and that he would need to get out of the echo chamber in which he had put himself. I told him then that our committee was headed down a “very dangerous path” and he needed to start leading quickly.

When I attempted to discuss and remedy the issues in the county committee I was called names including a “narcissist.” I quit discussing the matter because it was a waste of my time. I only have conversations with adults who know how to effectively communicate without engaging in name calling.

I have refused to communicate anything further with the Grays or Chairman Frank Curtis because they repeatedly apologize but they do not change their behavior. Their behavior and attacks towards good people have become worse. Also, regarding Frank Curtis, John Newcomb, and Rena Allmond, their words and behavior depends on who they are talking to. When they talk to me, they agree with me, when they talk to the Grays, they agree and do as the Grays tell them. It is not productive to have any discussions with them as they are malleable to the thoughts and actions of whoever they are around.

The JP elect that the committee wants removed regularly attacks other members and elected officials. When I sent out the call to the special meeting, she responded with the following email. (See Exhibit of email from Stephanie Johnson)

This complaint is filled with false allegations. The claim that I did not want a ten-year-old to help is an obvious lie as I often have kids including my own help during meetings. However, the Gray's ten-year-old was repeatedly going up to Chairman Frank Curtis during the meeting to tell him the rules. Mr. Curtis needs to learn the rules. Having a ten-year-old, or anyone repeatedly running to the front to talk to the chairman throughout a meeting is disruptive. The body wanted this disruption to stop. I suggested to the chairman that he ask for volunteers from the membership to serve as parliamentarian at each meeting. The suggestion was ignored.

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For more than a year, the Gray family has engaged in damaging behavior and has recruited others to assist them in such behavior. The following are just a few examples of such behavior:

- 1) Scott Gray was the campaign manager for a JP candidate in Saline County. He started a rumor at a Saline County Committee Meeting that his client's opponent, another Republican candidate, was a pedophile. When pressed for his evidence, he admitted he had none. I expressed my extreme disapproval and he responded that he thought he could say that to me because we were friends. Many other members of the Saline County Committee heard this allegation from the Scott Gray family and can testify to the truth of it.

I had a private conversation with Scott about this behavior and told him how extremely disgusted I was with his unfounded allegation towards another Republican candidate who happened to be his client's opponent and that I will not associate with him if he continued such behavior. He apologized, and we moved on.

Witnesses: Stephanie Duke: (501) 860-1262 Former Chairman David Gibson Sr. (501) 860-2803 and Amanda Bernard (501) 326-4938.

- 1) False Ethics complaints. The Grays have been behind false ethics complaints against our Republican Candidates. Alison Gray ran against Justin Rue in the Republican primary. Justin Rue won handily. Alison and her family claim he won due to cheating with the machines. During the primary, Alison and our Saline County Committee Secretary prompted a trusting committee member to file an ethics complaint against Rue based on Alison and Rena Almonds allegations. In the ethics complaint, they accus Justice of the Peace Rue of a pattern of sexual misconduct against women. I've

been told a lawsuit for slander against the committee member is forthcoming. (See exhibit) Witness Justice of the Peace Justin Rue: (501) 442-6503

The Grays were also involved in the ethics complaint against Doyle Webb. They drafted it, but used a mentally unstable member of our committee, Stephanie Johnson to file it. This ethics complaint was filed just days after Doyle evicted the members from the Saline County Republican headquarters. I will not speak to the merit of the complaint, but it is evident to me that the intent behind filing the complaint was pure retaliation for the eviction, which I will not condone.

- 2) False Police Reports. The Grays used Stephanie Johnson again to file false police reports against two women who disagreed with the Grays on other issues. Stephanie Johnson admitted that after talking to the Grays, she was convinced that the women attempted to blackmail Ms. Johnson with \$100. No one in their right mind thinks anyone can be blackmailed or bribed with \$100, but Ms. Johnson. (See exhibit) Witnesses: Kandi Cox (501)-993-6487 and Stephanie Duke (501)860-1262
- 3) Theft of property. A few months ago, it was discovered that Doyle and Barbara Webb's pictures that were hanging in the Saline County Republican Headquarters are missing. Angela Gray was observed taking the pictures after making the remark that "She was sick of looking at the pictures." The witness said she intended to throw them away but after it was pointed out that the pictures are personal property, Angela packaged them up and put them in her car and presumably took them home. The pictures have been returned but a plaque is still missing. The name of the witness is being withheld due to fear of retaliation by the Grays.
- 4) Scott Gray yelled at a candidate for state representative. We had a meeting where a candidate for State representative introduced himself to the committee and announced his candidacy. The issue of inappropriate books in the library came up. The candidate currently sits on the school board. Scott Gray yelled at the candidate that he was not doing enough to get rid of the books. When the candidate asked for clarification, Scott Gray continued to yell at him and told him he should be doing his research. He was very condescending and rude. The majority of the committee members were appalled by Scott's behavior.

I had another private conversation with Scott and our county chairman about Scott's behavior. I told him that it was inappropriate and embarrassing. I emphasized the need to disagree in a civil manner. I told him that he appears to not have control of his emotions. He admitted that he does not have control of his emotions. I suggested that he work on it. Scott apologized and we moved on.

Witnesses: Paul Childress (501) 860-3424 was the candidate Scott Gray yelled at. Scott did this in front of nearly 75 people. I can provide names and numbers upon request.

Scott will claim that he and the candidate are fine now, but that is because the candidate is a classy gentleman. No one has forgotten that embarrassing day.

- 5) Alison Gray sent a voluminous FOIA request in what many perceive to be retaliation for the County Judge asking for receipts proving the work that was done to justify the Grays being paid thousands of dollars by the committee. To my knowledge, the Grays have never provided a valid receipt despite being paid thousands of dollars from our committee. Multiple members have asked for the receipts, but none have ever been provided. Those who have asked for the receipts at a meeting, have been yelled at by the Grays.
- 6) Scott admitted to intentionally excluding people in our committee from notifications because they are "milquetoasters" or "not with us." Eugene Jamison, Stephanie Duke, and Amanda Bernard
- 7) Scott has personally called people names and smeared the character of good people who he perceived to have more influence than him.
  - a. Please see attached list of witnesses you can call who corroborate this.
- 8) Scott Gray created a video smearing Senator Kim Hammer and calling him a liar over his defense of paper ballots. This video can be seen on the Saline County Republican Committee's Facebook page.
- 9) He has consistently attacked, for more than two years, the very woman who invited him to our committee, because he thinks she has more influence in the committee than him.
  - a. He personally told me that she was a liar and a troublemaker.
  - b. I know this woman. She is well respected in our community for being a woman of integrity. Democrats hate her because she stands on principle. This woman is and should be revered, but the Grays were consistently targeting her for made up reasons. I eventually came to the conclusion that they were trying to tear her down due to her influence.
- 10) Secret executive meetings without notifying all executive members. At one executive committee meeting, Stephanie Duke wanted to discuss funding candidates and the Grays shut it down. Alison Gray argued that one candidate had around \$70k in the bank and therefore didn't need any of the committee's money. The Executive committee then wanted to remove 30+ inactive members from our roll without notice. Stephanie Duke objected.

- a. Knowing that Stephanie Duke would be out of town, the executive members who did not want Stephanie present at the meeting when the removal was suggested, had a secret executive meeting and voted to present the removal at the meeting that same night. Witnesses: Election Commissioner Robert Scott 501-317-8125, Audit Chair Stephanie Duke 501-860-1262

### **Allegation: Illegitimate Meetings**

Response to #4 Illegitimate Meetings: I did send out the call, with approximately 55 members signed on. I did not pay for the venue, did not chair the meeting, and I did not send the complaints.

I sent out the call using the contact list provided by the county committee secretary Rena Allmond in July of 2024. A few of Frank Curtis's and the Gray's followers claimed they never got the call even though they were posting about it within hours of it being sent out.

If we are now going to begin arguing that a meeting is illegitimate because a few people claim to not receive the call, you will never have a meeting.

The one of the objectives of the special meeting was to fund the Republican candidates, which the members of our executive committee purposefully stonewalled. (Witnesses Stephanie Duke: (501)860-1262 Election Commissioner Robert Scott (501) 317-8125 The committee also wished to stop the obvious targeting of members by the Gray family who disagreed with them. (See minutes from the special meeting) Since they have been exposed and realize they are outnumbered, they are trying to make it appear that they intended to fund our candidates all along, which is simply not true, and approximately 85% of our county committee will testify to this.

Our group who has held the special meetings did so in large part to add to the executive committee to create a committee that would work to fund our candidates. They asked the chairman to join them for a meeting to discuss funding the candidates, which he refused and then they, determined amounts to fund the candidates. We held a second special meeting to vote on funding the candidates,

At our special meeting, we elected members to the executive committee who immediately set to work determining amounts to contribute to the candidates.

**Witnesses** to the truth of the matter: Stephanie Duke, Kandi Cox, Keith and Terry Kellum, Randy and Marla Sams, Shannon Everett, Kevan Bradshaw, Amber and Ty Johnston and approximately 60 more committee members all of whose contact information can be provided upon request.

## **Allegation #5 Hostility and Division**

Response to #5 – This is nothing but salacious accusations with not a shred of evidence. Again, written by someone not even from our county or our district.

- a) The complainants are blaming me for the actions of two grown men. It is absurd to blame me for the fight that broke out between third vice chair Jon Newcomb and Jimmie Cavin. My husband had made a few motions, Third Vice chair, Jon Newcomb, yelled at my husband from across the room, calling him a “pussy” then told him to “shut up you fucking bitch” and he flipped him off. The chairman of the Saline County Committee did nothing to stop the yelling by his friend and Third Vice.
- b) As discussed above and can be proven by more than 50 members of our county committee, I have worked hard to get our candidates funded.
- c) The author is blaming me for my husband’s actions. This is absurd.
- d) I did not say this. This is a lie.
- e) This is speculation and reeks of desperation to find some shred of guilt.
- f) Again, more false accusation by the author. The authors couldn’t even get enough signatures from the second district to file a valid complaint.

Response to the Requested Remedy:

It is widely known that the complainants could not get enough signatures from the Second district to file a valid complaint which is why this complaint is going through the first district. However, based on evidence that I’ve seen, the First District couldn’t get enough signatures either which is the real reason why they are hiding the signatures.

# Exhibits



Jennifer Lancaster <jennifer@thelancasterlawfirm.com>

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## Arkansas Electors

12 messages

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**Mandy Lester - Legal** <[REDACTED]>  
To: "jennifer@thelancasterlawfirm.com" <jennifer@thelancasterlawfirm.com>  
Cc: Cristina Del Rosso - Legal <[REDACTED]>

Mon, Aug 12, 2024 at 5:23 PM

Hi Jennifer,

It was nice to meet you at RNLA. I spoke with Dave Warrington from the Trump campaign today, and we would like to put together a cover memo for your elector submission. We'll aim to get you something tomorrow.

Just to confirm, will you be able to coordinate a signature from the state convention secretary, as well? It looks like both of you will need to sign.

Thanks,  
Mandy

—  
Mandy Lester

Republican National Committee

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This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

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**Jennifer Lancaster** <jennifer@thelancasterlawfirm.com>  
To: Mandy Lester - Legal <[REDACTED]>

Tue, Aug 13, 2024 at 8:01 AM

Hi Mandy,

It was nice to meet you as well.

Yes, I can get the convention secretary to sign. However, I have concerns about this method of



curing as well.

Under Ark. Code Ann. 7-8-302(b), the convention chair and secretary shall certify to the Secretary of State the total list of electors by September 15th in the year of the election. Section (c) requires the certification to be filed by the respective political parties within 2 days after the state convention.

The Chair of the RPA (who I ran against for chair of the convention) filed the certification claiming I was on vacation, which is simply not true. I tried multiple times to reach anyone at the headquarters, but I have still never received a response back.

Additionally, under our Republican Party Rules, Article I, Section 10, "each candidate for Elector must certify in writing to the Republican Party of Arkansas that he/she will vote for the Republican candidate for President and Vice President of the United States of America."

None of our electors did this. I didn't even know I was going to be nominated for the elector position. I was elected an elector during the convention, and I have still not been asked to sign a certificate. I realize that this applies to candidates not elected electors. Our electors were nominated and then immediately elected by acclamation. Our electors were ineligible candidates at the time of their election, as they did not meet the qualifications for the post.

Under Arkansas Code Ann. 7-3-107, "each political party shall hold a state convention...for the purpose of performing other duties as may be required by party rules or by law."

Our Republican Party executives rarely follow our party rules or the law. It has been challenging, but at this point, I have serious concerns about our electors.

Our convention was recessed, as allowed under our rules and Robert's rules, to the call of the state convention chair. I suggest that we reconvene the convention, expunge the election of the electors, open the floor to nominations, have all candidates who are nominated at the convention sign a pledge to vote for our Republican candidates for President and Vice-President, hold another election for the electors, and then the convention secretary and I will file the certification within 2 days of the convention.

All this must be done by September 12th so we have time to file the certification. I think it is the safest route considering the members of the RPA have nullified everything the convention did, except the things that they approved of and have put it in writing that we may not have even had a quorum when the electors were elected. The democrats have been watching this play out.

I'm attaching the relevant Arkansas law below. Please let me know how you'd like to proceed.

Thank you for your help with this matter.

--

Jennifer M. Lancaster  
Partner, Attorney at Law

**LANCASTER & LANCASTER**  
**LAW FIRM, PLLC**

jennifer@TheLancasterLawFirm.com  
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[Quoted text hidden]

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**2 attachments**



**7-8-302 Election and certification of electors--Ballots--Contesting conventions-.pdf**  
114K



**7-3-107 State convention requirements.pdf**  
94K

---

**Mandy Lester - Legal** [redacted] - [redacted]  
[redacted] >

Thanks, Jennifer. Please hold for now. My paramount concern is making sure we do everything we can to protect President Trump's interests, so I've flagged for his campaign legal team.

---

Mandy Lester

Republican National Committee

[redacted]  
[redacted]  
[redacted]  
[redacted]

---

**Mandy Lester - Legal** [redacted] >  
To: Jennifer Lancaster <jennifer@thelancasterlawfirm.com>  
Cc: Cristina Del Rosso - Legal [redacted] >

Fri, Aug 16, 2024 at 8:28 PM

Hi Jennifer,

Apologies for the late email, but do you have any availability to hop on a call tomorrow, likely in the afternoon, with the Trump campaign?

Thanks,  
Mandy

---

Mandy Lester

Republican National Committee  
(202) 863-8719  
[mlester@gop.com](mailto:mlester@gop.com)

---

**From:** Mandy Lester - Legal  
**Sent:** Tuesday, August 13, 2024 6:45:20 PM  
**To:** Jennifer Lancaster <[jennifer@thelancasterlawfirm.com](mailto:jennifer@thelancasterlawfirm.com)>  
**Cc:** Cristina Del Rosso - Legal <[REDACTED]>  
**Subject:** RE: [External]Re: Arkansas Electors

[Quoted text hidden]

---

**Mandy Lester - Legal** <[REDACTED]>  
**To:** Jennifer Lancaster <[jennifer@thelancasterlawfirm.com](mailto:jennifer@thelancasterlawfirm.com)>  
**Cc:** Cristina Del Rosso - Legal <[REDACTED]>

Fri, Aug 16, 2024 at 8:35 PM

It sounds like 10:30 EDT actually would work best for the campaign. Are you available then?

—  
Mandy Lester  
Republican National Committee  
[REDACTED]

---

**From:** Mandy Lester - Legal <[REDACTED]>  
**Sent:** Friday, August 16, 2024 9:28:11 PM  
**To:** Jennifer Lancaster <[jennifer@thelancasterlawfirm.com](mailto:jennifer@thelancasterlawfirm.com)>  
**Cc:** Cristina Del Rosso - Legal <[REDACTED]>  
**Subject:** Re: [External]Re: Arkansas Electors

[Quoted text hidden]

---

**Jennifer Lancaster** <[jennifer@thelancasterlawfirm.com](mailto:jennifer@thelancasterlawfirm.com)>  
**To:** Mandy Lester - Legal <[REDACTED]>  
**Cc:** Cristina Del Rosso - Legal <[REDACTED]>

Fri, Aug 16, 2024 at 9:19 PM

Yes, how does 2:00 CST sound?

Jennifer Lancaster

On Aug 16, 2024, at 8:35 PM, Mandy Lester - Legal <[REDACTED]> wrote:

[Quoted text hidden]

---

**Jennifer Lancaster** <[jennifer@thelancasterlawfirm.com](mailto:jennifer@thelancasterlawfirm.com)>  
**To:** Mandy Lester - Legal <[REDACTED]>

Fri, Aug 16, 2024 at 9:21 PM

4:30 CST works too

Jennifer Lancaster

On Aug 16, 2024, at 9:19 PM, Jennifer Lancaster <jennifer@thelancasterlawfirm.com> wrote:

Yes, how does 2:00 CST sound?

[Quoted text hidden]

---

**Mandy Lester - Legal** <MLester@gop.com>  
To: Jennifer Lancaster <jennifer@thelancasterlawfirm.com>

Fri, Aug 16, 2024 at 9:23 PM

The campaign initially mentioned an afternoon call but then asked for 10:30 am EDT. Does that work on your end?

—  
Mandy Lester  
Republican National Committee  
[Redacted]

---

**From:** Jennifer Lancaster <jennifer@thelancasterlawfirm.com>  
**Sent:** Friday, August 16, 2024 10:21:19 PM  
**To:** Mandy Lester - Legal <[Redacted]>

[Quoted text hidden]

[Quoted text hidden]

---

**Jennifer Lancaster** <jennifer@thelancasterlawfirm.com>  
To: Mandy Lester - Legal <[Redacted]>

Fri, Aug 16, 2024 at 9:43 PM

Yes, that works. Can the convention parliamentary advisor join us?

Jennifer Lancaster

On Aug 16, 2024, at 9:23 PM, Mandy Lester - Legal <[Redacted]> wrote:

[Quoted text hidden]

---

**Mandy Lester - Legal** <[Redacted]>  
To: Jennifer Lancaster <jennifer@thelancasterlawfirm.com>

Fri, Aug 16, 2024 at 9:45 PM

Yes. Here's the dial-in: 866-253-8518, passcode: 38795464#

—  
Mandy Lester  
Republican National Committee  
[Redacted]

---

**From:** Jennifer Lancaster <jennifer@thelancasterlawfirm.com>  
**Sent:** Friday, August 16, 2024 10:43:56 PM

[Quoted text hidden]

[Quoted text hidden]

**Jennifer Lancaster** <jennifer@thelancasterlawfirm.com>  
To: Mandy Lester - Legal <[REDACTED]>

Sat, Aug 17, 2024 at 9:29 AM

I'm told that's the wrong passcode  
Jennifer Lancaster

On Aug 16, 2024, at 9:45 PM, Mandy Lester - Legal <[REDACTED]> wrote:

[Quoted text hidden]

---

**Mandy Lester - Legal** <[REDACTED]>  
To: Jennifer Lancaster <jennifer@thelancasterlawfirm.com>

Sat, Aug 17, 2024 at 9:31 AM

Try this passcode 35387793#

—  
Mandy Lester  
Chief Counsel  
Republican National Committee  
[REDACTED]

---

**From:** Jennifer Lancaster <jennifer@thelancasterlawfirm.com>  
**Sent:** Saturday, August 17, 2024 10:29:13 AM  
**To:** Mandy Lester - Legal <[REDACTED]>

[Quoted text hidden]

[Quoted text hidden]



Jennifer Lancaster <jennifer@thelancasterlawfirm.com>

---

**FW: Recall of the convention**

11 messages

---

al algage.com [REDACTED] >

Sat, Aug 17, 2024 at 10:37 AM

To: Seth Mays <seth@arkansasgop.org>, Mandy Lester - Legal <[REDACTED]>, "jennifer@thelancasterlawfirm.com" <jennifer@thelancasterlawfirm.com>

Sorry Jennifer I typoed your email on the first distribution.

Here is my draft!

AI

AI Gage, CPP-T, PRP, PAP

Certified Professional Parliamentarian w/Teacher Designation

Professional Registered Parliamentarian

Professional Accredited Parliamentarian

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** al algage.com

**Sent:** Saturday, August 17, 2024 8:34 AM

**To:** jennifer@lancasterlawfirm.com; Seth Mays <seth@arkansasgop.org>; Mandy Lester - Legal

<[REDACTED]>

**Subject:** Recall of the convention

Hello all,

Here is a draft of what is required to recall the convention from recess. To be clear, in the normal application of a recess, it would simply be an announcement to come back into the hall but in this case I think some form of notice is appropriate but not necessarily required.

Thanks,

Al

Al Gage, CPP-T, PRP, PAP

Certified Professional Parliamentarian w/Teacher Designation

Professional Registered Parliamentarian

Professional Accredited Parliamentarian



---

 Recall of the convention.docx  
16K

---

Jennifer Lancaster <jennifer@thelancasterlawfirm.com>

Sat, Aug 17, 2024 at 11:27 AM

To: "al algage.com" <[REDACTED]>

Cc: Seth Mays <seth@arkansasgop.org>, Mandy Lester - Legal <[REDACTED]>  
[REDACTED]

Al, Mandy and Seth,

I do not approve of the call as written. There should be ZERO questions over our electors. The RPA has put Trump's electors in jeopardy and this should be remedied immediately.

The following should happen:

- 1) The RPA must immediately rescind their vote to adopt the advisory opinion and acknowledge that it was in error and they had no authority to issue it. This opinion questions the Order of Business and quorum at the time the electors were elected.
- 2) Send the Convention Delegate List to the Convention Secretary at [district1ar@gmail.com](mailto:district1ar@gmail.com) and 'cc me.
- 3) The convention secretary will send the call to all members on the convention list within 48 hours of receiving the complete and accurate list.
- 4) If all of the above happens, we will gavel in and gavel out.

The executive team of the Republican Party of Arkansas has repeatedly proven they will not adhere to the rules and, as a result, has caused many problems including the one at hand. This needs to be resolved correctly and immediately. I am prepared to do just that which is why I reached out to you, Mandy.

—  
Jennifer M. Lancaster  
Partner, Attorney at Law

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[Quoted text hidden]

---

**Jennifer Lancaster** <jennifer@thelancasterlawfirm.com>

Sat, Aug 17, 2024 at 11:35 AM

To: "al algage.com" <[REDACTED]>

Cc: Seth Mays <seth@arkansasgop.org>, Mandy Lester - Legal <[REDACTED]>, [REDACTED]

For clarification on #4, while that will be my intention, it will require a vote of the body to adjourn.

--

Jennifer M. Lancaster  
Partner, Attorney at Law

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[Quoted text hidden]

---

**Jennifer Lancaster** <jennifer@thelancasterlawfirm.com>

Tue, Sep 3, 2024 at 2:20 PM

To: Mandy Lester - Legal <[REDACTED]>

Mandy,

It has been almost a month since I contacted you to inform you that our electors are in jeopardy due to the actions of Joe Wood, A.J. and other members of the RPA. As you and the members of the Trump team acknowledged on our call on August 17th, this is a very serious situation that could cost Trump the election. I have not heard back from you since August 17th when I told you what I need to properly correct the situation. The deadline to file the proper certificate is just around the corner. Are we going to work together to correct this situation?

Thanks.

[Quoted text hidden]

---

**Mandy Lester - Legal** <[REDACTED]>

Tue, Sep 3, 2024 at 9:27 PM

To: Jennifer Lancaster <jennifer@thelancasterlawfirm.com>



Jennifer,

Thanks for reaching out. While recalling the convention was one option that we were exploring, it is not necessary and since time is of the essence, it is no longer our preference.

The deadline in Arkansas Code § 7-8-302(1)(C) to certify presidential electors is two days after the state convention ends. Because the convention recessed, it has not ended. As long as the certification is submitted no later than two days after the convention ends and that date is also no later than September 15, the submission will be timely.

Attached is a copy of the certification document, and we will plan to send someone down, as we have been doing across the country, to facilitate signatures and signing. Are there any days this week or next that you would be unavailable?

Best,

Mandy

---

Mandy Lester

Republican National Committee

[REDACTED]

[REDACTED]

---

This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

[Quoted text hidden]

---

 **AR Certification of Electors.pdf**  
66K

---

Jennifer Lancaster <jennifer@thelancasterlawfirm.com>  
To: Mandy Lester - Legal <[REDACTED]>

Wed, Sep 4, 2024 at 9:08 AM

Mandy,

Thanks for sending this. How do you reconcile the fact that the RPA Executive Committee voted to adopt the "advisory opinion" that claimed the Convention was adjourned *sine die* on June 8th, that the convention did not have quorum at the time the electors were elected, and that acts done outside the order of business prepared by the Rules committee are null and void? The election of the electors was not done according to their order of business and is therefore, according to them, null and void.

--

Jennifer M. Lancaster  
Partner, Attorney at Law

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[Quoted text hidden]

---

Mandy Lester - Legal <[REDACTED]>  
To: Jennifer Lancaster <jennifer@thelancasterlawfirm.com>

Thu, Sep 5, 2024 at 2:48 PM

Hi Jennifer,

My view that the electors were properly elected and that the convention currently stands in recess has not changed since we last spoke on the phone. Do you have a different take on either of those issues?

Thanks,  
Mandy

[Quoted text hidden]

---

Jennifer Lancaster <jennifer@thelancasterlawfirm.com>  
To: Mandy Lester - Legal <[REDACTED]>

Mon, Sep 9, 2024 at 4:15 PM

Mandy,

Then it seems to follow that you do not believe the advisory opinion passed by the RPA executive committee is valid. Is that correct? It is the advisory opinion that states the convention adjourned *sine die* on June 8th. If it is true that the

convention adjourned *sine die* on June 8th, then I cannot sign the certificate because the law requires the certificate to be signed and filed within two days of the convention.

--

Jennifer M. Lancaster  
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[Quoted text hidden]

---

Jennifer Lancaster <jennifer@thelancasterlawfirm.com>

Tue, Sep 10, 2024 at 2:14 PM

To: Mandy Lester - Legal <[REDACTED]>, Seth Mays <seth@arkansasgop.org>, "al algage.com" <[REDACTED]>

All,

The final deadline to file a Certificate of Electors on September 15th is quickly approaching. Despite my repeated efforts to address this matter, you continue to allow President Trump's Arkansas electors to remain in jeopardy.

As stated in the "Advisory Opinion" adopted by the RPA State Executive Committee, the State Convention adjourned *sine die* on June 8th, establishing the deadline to file the certificate as June 10th under A.C.A. 7-8-302. If the "Advisory Opinion" is rescinded, it will be undisputed that the Convention stands in recess allowing me to sign a valid certificate as required by the law. While this does not offer the same level of protection for the electors as the approach I recommended a month ago, the delay has made timely action critical.

Therefore, the RPA must rescind its "Advisory Opinion" in full, issue a public statement confirming the rescission, and I will then immediately sign and file the certificate with the Secretary of State.

If you chose not to withdraw the "Advisory Opinion," I will interpret that decision as a lack of seriousness regarding this issue and I will then feel I have done my duty to protect the election for President Trump.

--

Jennifer M. Lancaster  
Partner, Attorney at Law

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[Quoted text hidden]

---

**Jennifer Lancaster** <jennifer@thelancasterlawfirm.com>

Tue, Sep 10, 2024 at 2:39 PM

To: Mandy Lester - Legal <[REDACTED]>, Seth Mays <seth@arkansasgop.org>, "al algage.com" <[REDACTED]>

I must also be provided with the original delegate list from each county.

Jennifer Lancaster

On Sep 10, 2024, at 2:14 PM, Jennifer Lancaster <jennifer@thelancasterlawfirm.com> wrote:

[Quoted text hidden]

---

**Jennifer Lancaster** <jennifer@thelancasterlawfirm.com>

Sat, Sep 14, 2024 at 7:08 PM

To: "Clinton W. Lancaster" <clint@thelancasterlawfirm.com>

--

Jennifer M. Lancaster  
Partner, Attorney at Law

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[Quoted text hidden]



**AR Certification of Electors.pdf**

66K

Members labeled by the executive committee members.

Sheet 1

1	Edward	Albares	Albares, Edward	current JP District 8	Current
2	Carlton	Billingsley	Billingsley, Carlton	current JP District 3	Current
3	Pat	Bisbee	Bisbee, Pat	current JP District 2	Current
4	Thomas	Bragg	Bragg, Thomas	filed for constable	
5	Gil	Carpenter	Carpenter, Gil	filed for JP District 4	Current
6	Jennifer	Carter	Carter, Jennifer	current collector / 4 yr	
7	Lance	Carter	Carter, Lance	collector husband	
8	Clint	Chism	Chism, Clint	current JP District 11	
9	Kevin	Cleghorn	Cleghorn, Kevin	current collector	cornoner
12	Karen	Crowson	Crowson, Karen	filed for JP District 13	
13	Doug	Curtis	Curtis, Doug	current county clerk / 4 yr	
14	Josh	Curtis	Curtis, Josh	current JP District 7	
15	C.J.	Engel	Engel, C.J.	current JP District 9	
16	Steven	Fay	Fay, Steven	Tammy Schmidt's husband	
17	Kelley	Ferguson	Ferguson, Kelley	Renee Rogers bestie	(RING)
18	Everette	Hatcher, III	Hatcher, III, Everette	current JP District 2	
19	Barbara	Howell	Howell, Barbara	current JP District 4	
20	Rustin	Jackson	Jackson, Rustin	state yr chairman	
21	Reagan	Jones	Jones, Reagan	filed for JP District 4	
22	Michael	McClain	McClain, Michael	Not sure who he is but we think he was born against	
23	Clint	Newcomb	Newcomb, Clint	current constable	
24	Holly	Payne	Payne, Holly	current county treasurer	
25	Lonny	Payne	Payne, Lonny	county treasurer's husband	
26	Lana	Prosen	Prosen, Lana	HSV RING (Lux friend)	
27	Bob	Ramsey	Ramsey, Bob	current county assessor / 4 yr	
28	Justin	Rue	Rue, Justin	current JP District 5	
29	Billy	Sample	Sample, Billy	Don't know them	
30	Jeanie	Sample	Sample, Jeanie		
32	Tammy	Schmidt	Schmidt, Tammy	outgoing state commit. treasurer	
33	Devon	Waite	Waite, Devon	filed for JP District 12	

2:56

75

< 84



5 People >

iMessage

Tue, Jul 2 at 4:09 PM

Rena Allmond

**Stephanie and Jennifer, I want to thank you ladies for the division among the Patriots in the SCRC because of your text, Stephanie, and your rally to vote against the Executive Committee last night, Jennifer. Now we will never be able to pass things that require a 2/3rds vote, AND we've been kicked out of the building. We also lost a donation of &500,000 to buy a building for us to use permanently. You two did a bang up job. I can't believe it. Thanks a lot.**



+

iMessage



to me, bcc: mdfriadams207, bcc: carrieaa, bcc: rallmond2, bcc: rockenback, bcc: krfb1981, bcc: anrbarnard, bcc: reginakaybeck, bcc: garydonbeck, bcc: riversidegrocery, bcc: nina92668, bcc

**Saline County Republican Committee Members,**

**The below named members of the Saline County Republican Committee issue this call to a special meeting to occur on Monday, August 26th at 6:00 pm at the Gene Moss Building at Tyndall Park.**

The purpose of this meeting is to consider items listed in the agenda below.

- 1) Call to Order
- 2) Invocation
- 3) Pledge
- 4) Elections
  - a) District members
  - b) Executive Committee Members
- 5) Resolutions
- 6) Matters of Interest
  - a) Censure, expulsion, and removal of certain members.
- 7) Business
  - a) Meetings for the remainder of the year.
- 9) Adjourn

4:10

69



Susan >

Thu, Sep 5 at 10:09 PM

Hey! Did you file an ethics complaint against Justin Rue?

Fri, Sep 6 at 6:26 AM

A long time ago yes

When?

During the Primary

Fri, Sep 6 at 8:24 AM

Why did you file it?

He was developing a pattern of verbally abusing women and I wanted to stop it

Can you give me examples of what you heard?

I got statements from Rena



iMessage

