

On behalf of the Sixth District Republican Committee I received a packet containing a challenge to the February 12, 2026, Mass Meeting with signatures.

Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

Date: 3-11-26

Brian Hamer

# Formal Contest of February 12, 2026, Mass Meeting and Request for Remedial Action

## Submitted Pursuant to the Republican Party of Virginia State Party Plan

Candidate for Chairman of the Warren County Republican Committee (WCRC) Scott Lloyd and the undersigned members of the Republican Party in Warren County respectfully submit the following challenges to the February 12, 2026, Mass Meeting of the Warren County Republican Committee to the Sixth Congressional District Republican Committee pursuant to the procedures set forth in the Republican Party of Virginia State Party Plan.

Article X, Section B, Paragraph 4 of the State Party Plan states in relevant part that, “All Contests and Appeals [...] must be made in writing within thirty (30) days after the decision appealed from and the appeal must be accompanied by a petition signed by at least twenty-five (25) Party members of the respective Unit [...] affected.”

The undersigned Party members request review of the February 12, 2026, Mass Meeting of the Warren County Republican Committee at which the position of Chairman, and the structure of the WCRC going forth from the meeting, which were determined under materially irregular circumstances.

Substantial irregularities occurred relating to the credentialing, ballot distribution, attestation, and facility access, the conduct within the committees, and the procedural order of the overall Mass Meeting. These irregularities materially affected the integrity of the election and the structure of the Committee, which the current leadership purports to be limited to 102 members at a time of record participation in a WCRC Mass Meeting.<sup>1</sup> These irregularities call into question the validity of the reported outcomes.

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<sup>1</sup> The 2020 WCRC Mass Meeting had 43 voting members. 431 people cast ballots in the February 12, 2026, meeting. *See*, <https://royalexaminer.com/warren-county-republican-committee-holds-mass-meeting/>

This appeal is not about personalities or factions. It is about the integrity of the Committee's processes. If the Republican Party is to demand election integrity from others, it must enforce it within its own ranks.

The remedy we seek here is not intended to be punitive in any way— it is corrective. A lawful, orderly, and transparent process protects every Republican voter and strengthens the Party as a whole. Only by setting aside a materially flawed mass meeting can the Party restore confidence and unity.

Accordingly, petitioners request that the District Committee review these matters and grant appropriate relief to ensure compliance with governing rules and to preserve confidence in the Party's processes and the Committee's ability to conduct its business legitimately over the next two years.

#### **I. Executive Summary of Material Irregularities**

The February 12, 2026, Mass Meeting of the Warren County Republican Committee (WCRC) was conducted outside of the governing laws and procedures, including the State Party Plan, WCRC bylaws, and Roberts Rules of Order, on several key points. These were not minor irregularities or procedural issues. They were, rather, failures to adhere to mandatory rules and guidelines designed to protect the rights of qualified Republican voters to choose their leadership and the structure of the WCRC in the days ahead.

#### **Regarding the vote for Chairman:**

##### **1. Qualified voters were denied entry and denied the opportunity to participate.**

Individuals who arrived before or at the announced start time were turned away. Others who arrived on time but could not secure parking were excluded. Some arrived after the start of the meeting and were turned away despite there being nothing in the official Call indicating that the vote

would close at 7 p.m. and despite there being no order or vote to disallow potential voters waiting to gain entry. Multiple qualified voters were excluded.

**2. The Chairman did not preside over the meeting.** The State Plan indicates that the “Chairman shall” preside over mass meetings until a temporary chair is chosen. He received advice from the RPV attorney, however, that another person was able to preside over the meeting and thought it was acceptable to ask John Massoud, the 6<sup>th</sup> District Chair, to preside over the opening of the meeting. This is inconsistent with the State Plan.

**3. Voter qualification safeguards were not enforced.** Attestations were not uniformly required, were not collected, and did not contain the renunciation language required under the RPV Plan. Known Democratic participants were observed casting ballots while Republican voters were simultaneously denied entry.

**4. Ballot distribution was chaotic and inconsistent.** At least 10–15 ballots were issued without any record of recipient names, and there are at least three “official” totals for ballots: 425 (the number tallied in the Credentials Committee); 441 (the number of eligible voters reported on the Floor without a vote of the Credentials Committee); 431 (the total number of votes cast). There was no vote on a final tally in the Credentials Committee.

**5. Official records were discarded or removed.** Attestation forms were destroyed. Required records were not preserved. Complete ballot distribution lists have not been produced despite repeated requests. Without the documentary record necessary to verify compliance, reconciliation is impossible. An election that cannot be verified cannot be validated.

**Regarding the WCRC’s structure:**

There was an attempt to change the structure of the Mass Meeting to the Optional structure allowing for only 102 members. There was no discussion of the proposed change in the lead-up to the Mass Meeting, and this proposed change was not part of the official call for the Mass Meeting.

1. **Voters audibly opposed the Motion to accept the rules.** The report of the Rules Committee is where this purported change occurred, and in the video of the vote it is possible to hear several people oppose the vote. The Temporary Chair did not acknowledge this opposition.

2. **The vote to change the structure was not announced in the official call.** It is irregular and presumptively improper for votes about the overall structure of the Committee to occur as a result of the Rules Committee's actions—a time when the Mass Meeting is voting to adopt the rules for Mass Meeting only. This change or proposed change is not part of the model rules found in the State Plan, and it was not a part of the Official Call for the Mass Meeting.

## **II. Complete Narrative of Irregularities with Reference to Authorities**

### **A. The Vote for Chairman**

#### **Before the Meeting**

1. In the lead-up to the Mass Meeting, there appeared to be a dearth of knowledge regarding contested mass meetings among the people in positions of responsibility for running it. It furthermore appeared that the people who were brought in to run it had not had recent experience with a contested mass meeting.

2. It appears from communications from Tom McFadden, Jr., the Chairman, that he was relying on Steve Kurtz, a member of the State Central Committee, to provide the background and expertise to have the meeting run as it the rules require it to be run. (Exhibit A).

3. There were explicit appeals by candidate David Silek to Democratic voters to vote in the Mass Meeting. (Exhibit B).

#### **Eligible Voter Access, Venue, and Capacity**

4. Article I, Section A of the Warren County Republican Committee bylaws states:

All legal and qualified voters of Warren County, regardless of race, religion, color, national origin, or sex, under the laws of the Commonwealth of Virginia, who are in accord with the principles of the Republican Party and who express in open meeting, if requested, their intent to support all of its nominees for public office in the

ensuing election, may participate in its Mass Meetings, Party Canvasses, Conventions, or Primaries in their respective Election Districts.

5. The call for the Mass Meeting, which RPV lawyer Chris Marston approved, did not provide any indication of when registration to vote would end, only when it would begin and when the meeting would start:

I, Thomas McFadden Jr., do hereby issue this notice and call for a Mass Meeting to be held at the Front Royal Volunteer Fire and Rescue Department, 221 N Commerce Ave, Front Royal, VA 22630, starting at 7:00 PM with registration beginning at 6:00 PM on Thursday, February 12, 2026 for the following purposes: (Exhibit C).

6. The notice did not specify a closing time for voting or indicate that the committee would prevent individuals arriving after 7:00 p.m. from voting. Some read the above notice and concluded that they would be able to arrive after 7:00 p.m. and still be able to vote. They planned around competing obligations and arrived accordingly. (Affidavits ██████████)

7. Prospective voters relied on the accuracy of the public pronouncements to arrange to go to the meeting in time to vote. (Affidavit of ██████████ Affidavit of ██████████).

8. At 7 p.m. or soon after, Steve Kurtz apparently ordered that the doors be shut and no additional voters be allowed in to register. This decision contradicts the language of the official call, which did not specify a closing time for registration, and it was a decision that neither the Chairman, Tom McFadden, Jr., who was absent, nor Scott Lloyd, the senior officer present at the meeting, authorized. There was, furthermore, no vote within the meeting itself to close voter registration. (Affidavit of ██████████; Affidavit of Scott Lloyd).

9. Silek supporter George Cline, without any legitimate authority to do so, remained at the door turning away potential voters (Affidavit of ██████████). No authorized WCRC officer told Cline to do so. (Affidavit of Scott Lloyd).

10. The vote did not actually start until after 8:00 p.m. Numerous individuals who arrived after 7 p.m. were turned away. (Affidavit of ██████████; Affidavit of ██████████; Affidavit of ██████████)

[REDACTED]). Some arrived at the venue on time but could not find parking. (Affidavit of [REDACTED]  
[REDACTED]; Affidavit of [REDACTED]; Affidavit of [REDACTED]). These voters leaned heavily in  
favor of Scott Lloyd. (Affidavit of Scott Lloyd).

11. The chosen venue was insufficient to accommodate the turnout. That led to a bottleneck at  
the door that led to at least one Lloyd voter leaving in frustration. (Affidavit of Scott Lloyd).

12. This issue coupled with the unauthorized and improper “close” of voting at 7p.m. led to the  
denial of entry to qualified voters and the denial of the opportunity to participate in the vote.  
(Affidavit of [REDACTED]; Affidavit of [REDACTED]; Affidavit of [REDACTED]; Affidavit of  
[REDACTED]; Affidavit of [REDACTED]; Affidavit of [REDACTED]).

13. The number of people shut out varies in estimates from 9 to 40 or more. (Affidavit of [REDACTED]  
[REDACTED]; Affidavit of [REDACTED]; Affidavit of [REDACTED]; Affidavit of [REDACTED]). The  
fact that the doors were shut and not more voters would be permitted to enter was also  
communicated via text and email to others who intended to attend, thereby denying them the  
opportunity to participate in the process. (Affidavit of [REDACTED]).

14. The number of people turned away was, by multiple accounts, more than enough to sway  
the election of the Chairman in the opposite direction, and the decision to cut off the vote and  
exclude potential voters was one that occurred without any authorization and without a vote.

**The Chairman did not Preside over the Mass Meeting / Agreement that Potential Voters  
Outside Would be Allowed to Vote**

1. The Virginia State Party Plan Article VI, Section D, 2c, states that the [County] Chairman  
“shall... preside over [Mass Meetings] until a temporary organization is put in place.”

2. Chairman McFadden arrived at the Mass Meeting during the registration period in the 6  
o'clock hour.

3. He received advice, however, from RPV attorney Chris Marston that it was acceptable for another person to open the meeting and preside over the election of a temporary chair. He asked John Massoud, Sixth District Chairman, to do it in his stead and left.

4. He left sometime between 6:15 and 6:30 p.m. (Affidavit of [REDACTED]). Scott Lloyd, the Secretary, was the senior WCRC officer in the room after this but did not know McFadden had left. He spent a considerable amount of time looking for him so that he could answer questions that had come up. (Affidavit of Scott Lloyd).

5. At around 7 p.m., the candidates were informed that the hall was at capacity. Together the candidates agreed that those who were inside would be allowed to vote, and once they voted and left, the others outside would be allowed to enter, check in, and vote. (Affidavit of Scott Lloyd; Affidavit of [REDACTED]).

6. Also around 7 p.m., it became time to open the meeting. Because Chairman McFadden had already left, Secretary Scott Lloyd addressed the crowd. He announced that because the room was at capacity, the people in the room would be allowed to vote, and those outside would be allowed in as those who voted left, as previously agreed between the candidates. (Affidavit of Scott Lloyd; Affidavit of [REDACTED]). He stated in relevant part:

We are at capacity from a fire safety standpoint and we have some people who are outside and they're waiting to come in and vote. Both David [Silek] and I want those people to have the opportunity to vote 'cause they came out just like you guys did. We want you all to have [...] a proper vote count as well. So, what we're going to do is we're going to call this meeting to order, we're going to proceed to the vote as quickly as possible, the people who are...who have a ballot they can cast their ballot, they can leave; as each person leaves another person can come in. We can move [...] through this evening as quickly as we can.

[...] Just in the interest of keeping things going [...] the current Chairman is Tom McFadden Jr. We can't [...] locate him at the moment; the vice chairman is not available tonight either. So it devolves into the Secretary, and I am the current Secretary so I am just going to call this meeting to order and pass the mic to [...] John [Massoud] who is going to give a brief introduction, and we'll do the invocation, pledge of Allegiance, and we'll get rolling.

7. Candidate Lloyd truncated his remarks according to the understanding that the first group of voters must exit the hall to allow those outside to enter, so he wanted to proceed to the first vote and begin the check-in process for the second group of voters. (Affidavit of Scott Lloyd).

**Voter Qualification and Attestation Failures**

8. The WCRC used the Model Rules of the Republican Party Plan for the State of Virginia for the designation of a Credentials Committee for the Mass Meeting, and accordingly, the WCRC created the Credentials Committee and appointed members to that committee.

(<https://virginia.gov/wp-content/uploads/sites/10/2025/09/Party-Plan-Amended-August-16-2025.pdf>).

9. The Mass Meeting adopted the rule that “the Credentials committee shall report on the proper credentials of each voter and decide any questions that may arise concerning eligibility to participate.” (Report of Cheryl Cullers, Chair of the Nominations Committee, MVI\_0002.MP4 7:48:00).

10. The Credentials Committee was insufficiently briefed on the procedures that they were to follow.

11. The Credentials Committee never met as a committee to discuss any disputes over any voter’s credentials and never met as a committee to formalize the number of ballots or the final vote. (Affidavit of [REDACTED] Affidavit of [REDACTED] Affidavit of [REDACTED]).

12. The Credentials Committee was not consulted on voter credentials, could not answer basic questions from prospective voters, was not provided with a final count of individuals admitted to the meeting until the report was presented on the floor, did not receive a complete list of all individuals who were issued ballots, and did not take a vote on the Credentials Committee report. (Affidavit of [REDACTED] Affidavit of [REDACTED] Affidavit of [REDACTED]).

13. At least one person who checked in was not asked to show identification. (Affidavit of [REDACTED]

[REDACTED]; Affidavit of [REDACTED]; Affidavit of [REDACTED].

14. According to at least one attendee/voter, Silek supporter Crystal Cline told two people who did not want to sign the attestation that they did not have to sign it, and the Committee was not collecting them. The Committee did not look at or collect the attestation from that same attendee. One was observed crumpling the affidavit and placing it in his pocket. (Affidavit of [REDACTED]).

15. According to one member of the credentials committee, many of the dozens of people who were turned away were Republican voters, and Democrat voters remained in the room during the meeting while these Republicans were refused entry because of capacity issues. (Affidavit of [REDACTED]).

16. Of those ballots cast, members witnessed several prominent members of the Democratic Party casting ballots. This includes at least four prominent members whom eyewitnesses saw casting ballots. (Affidavit of [REDACTED]).

17. According to Article I, Section A, Paragraph 5 of the State Plan, anyone who voted in the primary of another party within the past five years was obligated to renounce their affiliation with that party in writing before voting.<sup>2</sup> The language of the State Party Plan is unequivocal and does not provide for any discretion on the part of the Committee or the Mass Meeting regarding whether or not it must collect these renunciations.

18. The Credentials Committee did not collect any such renunciations.

19. The form provided to prospective voters did not contain the requisite Renunciation language. (Affidavit of [REDACTED]; Affidavit of [REDACTED]). Copy of form below:

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<sup>2</sup> 4. a person otherwise qualified hereunder shall not have participated in Virginia in the nomination process of a party other than the Republican Party with in the last five years...5. A single exception to Paragraph 4 shall be approved for a voter that renounces affiliation with any other party in writing...”

# Warren County Republican Committee

I, \_\_\_\_\_, do hereby declare that I am seeking to be admitted to the Warren County Republican Committee Mass Meeting, Thursday, Feb 12 at 7:00 P.M.

I certify that I am a qualified and registered voter and reside in Warren County. I am in accord with the principles of the Republican Party and intend to support the Republican nominees and endorsees in the next General Election that will be held on November 3, 2026.

Furthermore, I certify that I have not participated in Virginia in the nomination process of a party other than the Republican Party within the last five years.

Signature \_\_\_\_\_

20. Steve Kurtz also assured candidate Scott Lloyd repeatedly before the meeting that Democrats and “hard Democrats” (as indicated in the RPV voter information system) would not be allowed to vote. (Affidavit of Scott Lloyd).

21. Despite these reassurances, members of the Democratic Party cast their vote for Chairman of the Warren County Republican Party without the written renunciation required in the State Party Plan.

## Chaotic Ballot Distribution and Vote Count Discrepancy

22. The Credentials Committee checked in voters and gave them a sticky note that they could use to retrieve a ballot once checked in. This process appeared without any instruction; the members of the Credentials Committee guessed at the process from what they saw others doing and began doing the same. (Affidavit of [REDACTED]; Affidavit of [REDACTED]).

23. Steve Kurtz began as the only person handing out ballots, writing down names as he handed them out. When his line got too long, others stepped in—two at first, then another three for a total of six individuals. Each of these six individuals wrote down names as they handed out ballots. (Affidavit of [REDACTED]; Affidavit of [REDACTED]).

24. According to another member of the Credentials Committee, fellow Credentials Committee members informed him that they gave out 10–15 ballots without writing down any names. (Affidavit of ██████████).

25. When the six individuals handing out ballots came together, they had 62, 139, 54, 15, 68, and 87 people on their respective lists. The Credentials Committee tallied 425 eligible voters. (Affidavit of ██████████).

26. Steve Kurtz confirmed this number—425—with members of the Credentials Committee. (Affidavit of ██████████).

27. The number of ballots cast was 431—six more than the number of eligible voters identified. (Affidavit of ██████████).

28. Steve Kurtz reported to the floor that there were 441 eligible voters, which differs from the tally of ballots handed out by 16. (MVI\_0002.MPF at 07:45:03)

29. His announcement to the floor was inaudible to the people in the back of the room, which is where the Credentials Committee was set up. (Affidavit of ██████████).

30. The Temporary Chair, Matt Tederick, did not call a vote to accept that number as accurate. (MVI\_0002.MPF at 07:45:13)

31. The chaotic, unsupervised process described above, with six individuals independently handing out ballots and 10–15 ballots distributed with no names recorded, resulted in a final ballot count (431) exceeding the number of eligible voters on record (425).

32. The Credentials Committee never met and / or voted on any disputes over any potential voters and never voted on the final tally of ballots issued.

33. It is clear from this testimony that the Credentials Committee handed out at least ten, but as many as sixteen, ballots without creating any record of who they handed them out to. The

Credentials Committee never voted on a final tally, but to the extent that it arrived at a final tally, it was less than the number reported on the floor and was less than the number of ballots cast.

34. No member of the Party can have any confidence in the accuracy of this process, which was fatally flawed and 100% inconsistent from the final tally, to the vote on the floor, to the final number of ballots cast, and which does not have the benefit of a vote by the Credentials Committee, whose entire purpose is to ensure the integrity of the balloting process.

### **Destruction and Withholding of Official Records**

35. After distributing the ballots, Steve Kurtz instructed members of the Credentials Committee to discard all attestation forms and used ballots. (Affidavit of ██████████).

36. When Scott Lloyd returned to the fire hall to retrieve them from the trash, he was told that someone had already removed the discarded attestation forms and ballots from the fire hall early in the day on Friday, February 13, 2026, before Warren County Fire Department members could take the trash down to the dumpster. (Affidavit of Scott Lloyd).

37. Six members of the credentials committee were handing out ballots to people who had been checked in. Candidate Lloyd requested the list of people who had received ballots from Steve Kurtz at 1:21 a.m., 8:22 a.m., 11:29 a.m., 5:15 p.m., and 7:55 p.m. on February 14, 2026. (Affidavit of Scott Lloyd).

38. So far, Lloyd has received only two lists representing a fraction of the final list of ballots distributed. (Affidavit of Scott Lloyd).

39. Lloyd renewed his request to Steve Kurtz for the list(s) of ballots issued on Monday, February 16, 2026, copying David Silek and John Massoud, Sixth District Chairman. He stated:

I am asking you [Steve Kurtz] in your capacity as the Chairman of the Credentials Committee to turn over your partial list and 1) identify the other three individuals who were issuing ballots 2) contact them and retrieve the lists they created 3) turn them over to me.

Mr. Chairman, I am requesting access to the GOP database to check the list of individuals who received ballots against the database to determine whether they have voted in

Democratic primaries in the past five years. This is in response to the assertion made by several of the attendees Thursday night that several prominent members of the Warren County Democratic Party casted ballots. I will report any findings back to this group once I am able to check. (Affidavit of Scott Lloyd).

40. Instead of providing the requested documentation, Mr. Silek issued a “Warning Notice to Cease and Desist.” (Exhibit D; Affidavit of Scott Lloyd).

41. He later followed up by stating in relevant part, “Your request is hereby denied until I have time to speak with RPV Counsel. I am in court all day today, so it will have to be tomorrow.”

42. Mr. Silek has not followed up with the results of any discussion with RPV Counsel.

43. The destruction or removal of these materials prevents meaningful verification of the vote and frustrates review of compliance with governing rules. It calls into question the integrity of the vote and renders the vote both unreliable and untrustworthy.

#### **B. The Structure of the WCRC**

44. Regarding membership, Article VI, Section A, Paragraph 3 of the State Party Plan states (emphasis added):

##### Members—Optional Method

a. At-Large Members - the number shall be determined by the Unit Committee, but, if limited, not less than one (1) member per 250 votes based upon Republican Party Voting Strength for the Unit, **with such limit being included in the Unit’s call for the Mass Meeting**, Party Canvass, Convention, or Primary for the purpose of electing delegates to the Biennial District Convention.

b. This method is only available to Units serving localities with a population of fewer than 300,000.

54. The Official Call for the February 12, 2026, WCRC Mass Meeting states in relevant part (emphasis added):

[P]ursuant to the Plan of Organization and as recommended and directed by the Committee, I, Thomas McFadden Jr., do hereby issue this notice and call for a Mass Meeting to be held at the Front Royal Volunteer Fire and Resue Department, 221 N Commerce Ave, Front Royal, VA 22630, starting at 7:00 PM with registration beginning at 6:00 PM on Thursday, February 12, 2026 for the following purposes:

### 3. Elect up to 251 members of the Warren County Republican Committee.

55. The report of the Rules Committee, however, stated:

Pursuant to the Party Plan at large Optional Method the Warren County Republican Committee shall...total membership shall be limited to one member per 250 votes based upon Republican voting strength of the Committee. MVI\_0002.MP4 7:48:15.

56. Cheryl Cullers provided the report of the Rules Committee. She did not speak into the microphone, so it was not possible for the people in the back of the room to hear. When people informed her of this, she did not correct it.

57. The report of the Nominations Committee stated:

I would just like to remind everybody our report is that at large maximum membership is 102. We had a total number of applications to requesting membership of 181. We selected these randomly which we will read off. Anyone who did not have their application accepted please remember that you can always join at the first meeting. MVI\_004.MP4 8:24:49.

58. The vote to accept these members was as follows:

I make a motion that the name...the 102 names read by [...] Ms. Cockrell be accepted. MVI\_0004.MP4 8:29:00.

59. There was no vote relating to the limit of membership at that time.

60. Members of the Nominations Committee reported that few if any of the applicants accepted at the February 12, 2026, meeting paid any dues to the committee. This concern was dismissed as something the Committee could rectify later.

61. It became clear at the next meeting of the WCRC on February 26, 2026, that the current WCRC leadership intended to treat the 102 new members as the exclusive membership of the WCRC. Although asked, the Executive Committee did not hold a vote on new membership.

62. The outgoing Vice Chair made a motion to accept new membership applications. After the new Vice Chair Steve Kurtz suggested that he could not make a motion because he was no longer a member, the motion died on the floor without a second.

### **III. CONCLUSION AND REQUESTED RELIEF**

Regarding the election of the Chairman, the margin of the reported vote was 19 votes. The number of individuals excluded, the number of ballots distributed without record, and the discrepancy between ballots issued and ballots counted each independently exceed or approach that margin. Accordingly, the procedural violations were outcome-determinative or, at minimum, render the outcome indeterminate.

Each of these violations independently undermines the February 12 vote for Chairman. Taken together, they establish that the meeting was conducted in material disregard of mandatory bylaws governing participation, presiding authority, voter qualification, and ballot control.

Because the procedural safeguards designed to protect election integrity were not followed, the rights of qualified Republican voters were violated. The resulting vote is unreliable and invalid. Accordingly, the February 12, 2026 Mass Meeting vote for Chairman must be set aside.

Regarding the purported change in the membership structure of the WCRC, there was clearly no indication in the Official Call for the Mass Meeting that there would be any discussion of a change in the structure of the Committee, as required in Article VI, Section A, Paragraph 3 of the State Party Plan.

Even setting aside this fatal procedural flaw, and supposing for the sake of argument that this was a proper matter for consideration at the Mass Meeting, nothing occurred during the meeting that could have effectuated this change. The purported change that seems to have its origin in the report of the Rules Committee, a vote that members of the meeting opposed without acknowledgement, and in any case is a vote to adopt procedures for the meeting, not for the Committee's structure. To the extent that anyone would claim that the change happened during the report of the Nominations Committee, the motion on the floor from that committee was that the meeting accept the names read off, not change the structure of the committee. The initial report of

the Nominations Committee before the motion indicated that people could join at the next meeting, which did not happen.

Even though these flaws, too, are fatal, the project never got off the ground, because the Official Call did not include this matter, as required in the State Party Plan.

Therefore, for the reasons set forth in the foregoing affidavits, exhibits, and supporting statements, and in order to preserve the integrity of the Warren County Republican Committee and the confidence of its members and participants, and to preserve the primacy of the WCRC's bylaws and the rules of the State Party Plan, the undersigned respectfully request the following relief:

**1. Set Aside the Results of the Vote for Chairman.**

The undersigned request that the February 12, 2026, election for Chairman of the WCRC that occurred at the Mass Meeting of February 12, 2026, be declared void and of no effect due to substantial procedural irregularities, lack of ballot control, inconsistent attestation requirements, and the exclusion of qualified participants.

**2. Set Aside all Votes and Decisions of Current the Leadership that has Served Pursuant to the Mass Meeting that Occurred on February 12, 2026.**

The undersigned furthermore request that all decisions that the Leadership purportedly chosen at the February 12, 2026, be set aside and declared null and void.

**3. Interim Leadership.**

That Thomas McFadden, Jr., as the duly elected Chairman prior to the February 12 meeting, be restored to serve as Chairman on an interim basis until a properly conducted election is held; or, should Mr. McFadden decline to serve, that the duly elected Vice-Chairman assume the duties of Chairman in accordance with governing documents pending a valid election.

**4. Call a New Mass Meeting**

That the Sixth District assist in calling and running a new and proper Mass Meeting for the Warren County Republican Committee.

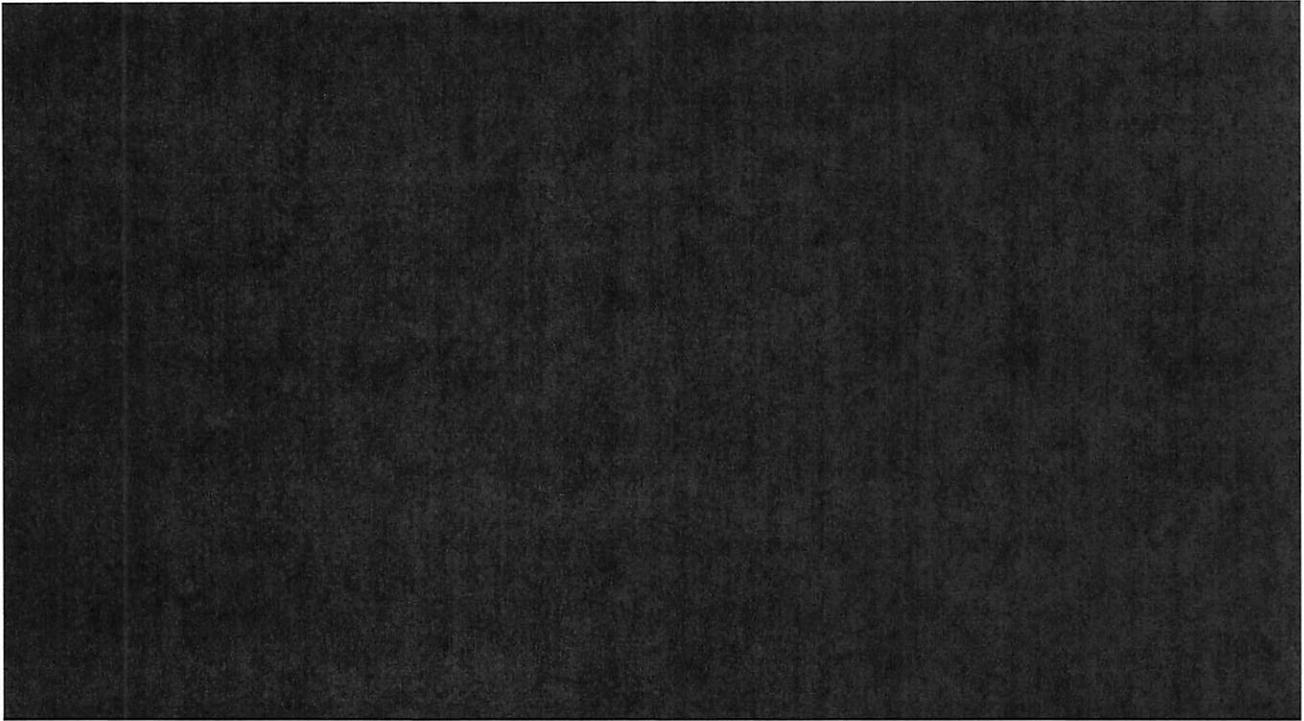
# **EXHIBIT A**

**From:** Tom McFadden tmcfaddenjr@yahoo.com  
**Subject:** Re: Last night  
**Date:** February 13, 2026 at 3:39 PM  
**To:** [REDACTED]  
**Cc:** Edward Lloyd edwardscottlloyd@gmail.com



Steve Kurtz was basically in charge of the evening, so he booked the place, he arrived when he arrived, he set up the computer screeners, and so on. I have no further comment on any of this.

Tom McFadden



# **EXHIBIT B**



Top fan

**David Silek**

Dear Fellow Citizens:

If you feel that in the past few years our County has gotten off-track and that the proverbial "cart" or course needs a "correction," please join with me and other concerned citizens of Warren County in seeking that course correction starting this Thursday evening.

I first started volunteering with the Warren County Republican Committee in 1986—that would be 40 years ago—and through high school, college, and immediately after college, I supported the work of the Committee. I believe it was Bernie Stokes, **Carolyn Swiger**, and her daughter Joanne who got me to start working the polls in 1986. My high school government teacher, **Barbee Brown**, further encouraged direct civic involvement and urged all of us in our AP Government class to get out to work the polls and to be engaged. She instilled in me a love of **The Constitution of the United States of America** and an appreciation for what early Virginians fought to provide us: a representative government.

It is time that our local government starts to better represent its citizens.

Back in the 1980s, Warren County was still a Democrat-controlled place, and being a Republican was not the popular position. The Democrats controlled the Board of Supervisors and nearly every elected office in this county. It was a struggle back then to be a Republican in Warren County.

Somehow, in the past few years, the local committee has simply lost its way. It has forgotten who and where the majority of our county's residents are. The local committee has failed in its role to support statewide candidates or even local candidates in the last election. As a result, we now face 83 tax increases in this Commonwealth, not to mention a complete loss of freedom in the classroom. The local committee championed people who sought to close our library and put people in place who do not promote our common good—people who seem to promote divisiveness rather than a sense of community. That is not who we are.

candidates in the last election. As a result, we now face 83 tax increases in this Commonwealth, not to mention a complete loss of freedom in the classroom. The local committee championed people who sought to close our library and put people in place who do not promote our common good—people who seem to promote divisiveness rather than a sense of community. That is not who we are.

It's time for the local committee to get back to basics. In Warren County, we believe in hard work, accountability, and putting our neighbors first. For those of us who survived the closure of Avtex and the economic depression that resulted—the horrible effect that closure had on both white-collar and blue-collar working families with the loss of local living-wage jobs, forcing hour+ long commutes for a living wage, creating latchkey children and the consequences of that, and the total shift of a tax base from majority manufacturing to residential taxes having to bear the bulk of our local tax burden—well, my friends, these are the people who have not been represented, or who have been ignored.

Not all of Warren County has IT jobs or works from home or can afford to stay home and educate at home. Thousands depend upon public schools and our library to help educate their children, and their voice needs to be heard too. That's the kind of representation you'll get from me. Banning books and shuttering the library are not things I believe promote the common good.

My faith teaches me that God gave each of us an inquiring and discerning heart, the courage and will to persevere, a spirit to know and to love God and all of His children, and the gift of joy and wonder in all His works. We live in a beautiful part of God's creation. He gave it to us to use and to have life abundantly—and to be good stewards of His creation.

I ask that others outside of typical Republican ranks also please consider supporting me. You do not have to be a "registered Republican"—not that we register by party in the Commonwealth—just a registered voter. You might be asked to sign a statement that you intend to support the Republican candidate in the next election. This is not a barrier to your participating on Thursday. Just remember that some of these same people requesting this of you are the same "Republicans" who failed to support the Republican candidate for Board of Supervisors last fall in Warren County—the

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The restructuring of the Warren County Republican Committee is this Thursday, February 12, 2026, at 6:00 PM at the Front Royal Fire Hall. I would suggest that you come earlier if possible!

Thank you!

4w Like Reply

43  

[View all 10 replies](#)



**Deborah Hickerson**

Proud of you, good luck.

4w Like Reply



# **EXHIBIT C**

# Warren County Republican Committee

## Official Call for a Mass Meeting of the Warren County Republican Committee of the Republican Party of Virginia

As Chairman of the Warren County Republican Committee of the Republican Party, and pursuant to the Plan of Organization and as recommended and directed by the Committee, I, Thomas McFadden Jr., do hereby issue this notice and call for a Mass Meeting to be held at the Front Royal Volunteer Fire and Resue Department, 221 N Commerce Ave, Front Royal, VA 22630, starting at 7:00 PM with registration beginning at 6:00 PM on Thursday, February 12, 2026 for the following purposes:

1. Elect 102 Delegates and an equal number of Alternate Delegates to represent the Committee at the Republican 6th District Convention which shall be held on April 25, 2026, at Peter Muhlenberg Middle School, 1251 Susan Ave., Woodstock, VA 22664, or its alternate site starting at 10:00 am., local time. The Warren County Committee shall have 102 delegate votes.
2. Elect a Chairman of the Warren County Republican Committee.
3. Elect up to 251 members of the Warren County Republican Committee.
4. Transact such other business as may properly come before the Mass Meeting.

### Qualifications for Participation

All legal and qualified voters of Warren County under the laws of the Commonwealth of Virginia, regardless of race, religion, national origin or sex, who are in accord with the principles of the Republican Party and who, if requested, express in open meeting either orally or in writing as may be required, their intent to support all of its nominees for public office in the ensuing election, may participate as members of the Republican Party of Virginia in its mass meetings, party canvasses, conventions or primaries encompassing their respective election districts.

### Filing Requirements

**Candidates for election as Delegates and Alternates to the 6th Congressional District Convention** shall file a form, which is a written statement of intention, by mail, email or in person, to the Secretary of the Warren County Republican Committee, Scott Lloyd, P.O. Box 2020, Front Royal, VA 22630, [secretary.republicancommittee@gmail.com](mailto:secretary.republicancommittee@gmail.com). In addition to the filing the form, candidates for Delegate and Alternate to the 6<sup>th</sup> District Convention must pay the \$20 filing fee made payable to the Warren County Republican Committee by check or online at <https://www.warrencountyvagop.com>. The form and filing fee must be received no later than 5:00 pm, Monday, February 2, 2026. The form for filing to be a candidate for Delegate or Alternate is attached to this Call. Postmarks do not govern.

**Candidates for election to the office of Chairman of the Warren County Republican Committee** shall file a form, which is a written statement of intention, by mail, email or in person, to the Secretary of the Warren County Republican Committee, Scott Lloyd, P.O. Box 2020, Front Royal, VA 22630, secretary.republicancommittee@gmail.com. The form must be received no later than 5:00 pm, Friday, January 30, 2026. In addition to filing the form, candidates for Chairman of the Warren County Republican Committee must pay the \$200 filing fee made payable to the Warren County Republican Committee by check or online at <https://www.warrencountyvagop.com>. A form for filing to be a candidate for Chairman is attached to this Call. Postmarks do not govern.

**Candidates for election as Members of the Warren County Republican Committee** shall file a Warren County Republican Committee Application, by mail, email or at the Mass Meeting, to the Secretary of the Warren County Republican Committee, Scott Lloyd, P.O. Box 2020, Front Royal, VA 22630, secretary.republicancommittee@gmail.com. The application if mailed should be received by mail Monday, February 9, 2026, 5:00 P.M., or delivered to the Mass Meeting on February 12, 2026, before the vote to accept all new committee members by the Mass Meeting. The application for filing to be a candidate for Member of the Warren County Republican Committee is attached to this Call. In addition to the filing the form, candidates for membership of the Warren County Republican Committee must pay a \$50 annual due as member made payable to the Warren County Republican Committee by check or online at <https://www.warrencountyvagop.com> at or before the first scheduled regular WCRC meeting. A form for filing to be a candidate for membership to the Warren County Republican Committee is attached to this Call. Postmarks do not govern.

The total membership of the Committee shall be set at 251 Members. Based on the results of the 2024 Presidential Election Republican votes and the 2025 Virginia Governor Election votes, membership shall be allotted as follows: 101 Fork Town, 15 Members; 102 Otterburn, 36 Members; 201 Happy Creek, 27 Members; 202 Linden, 27 Members; 301 North River, 18 Members; 302 Riverton, 30 Members; 401 East Shenandoah, 36 Members; 402, West Shenandoah, 16 Members; 501 South River, 26 Members; 502 Bentonville, 12 Members; 504 Browntown, 8 Members.

At-Large Memberships will be capped at 75 members total.

No nominations for offices to be filled by the Mass Meeting may be made from the Floor except upon the vote of two-thirds of those properly credentialed to vote at the Mass Meeting.

## **Mandatory Non-Refundable Filing Fees for the District Convention**

To assist the operations of the 6<sup>th</sup> District Republican Committee in supporting Unit mass meetings and conventions, and the administration of the 6<sup>th</sup> District Convention, a mandatory non-refundable contribution of \$20.00 made payable to the Warren County Republican Committee is requested of each person standing for election as a delegate or alternate delegate to the 6<sup>th</sup> District Convention.

A mandatory candidate filing fee of \$20.00 made payable to the Warren County Republican Committee is requested of each person standing for election as a delegate or alternate to the 6<sup>th</sup> District Convention.

## **Registration Fee**

There will be no registration fee to participate in the Mass Meeting.

## **Publication of Call**

A full copy of this Call for a Mass Meeting shall be posted, and available on the Sixth Congressional District Committee of the Republican Party of Virginia website ([www.sixthdistrictgop.org](http://www.sixthdistrictgop.org)), the Warren County Republican Committee website ([www.warrencountyvagop.com](http://www.warrencountyvagop.com)) and the Republican Party of Virginia website ([www.virginia.gop](http://www.virginia.gop)). In accordance with Article 8, Section A2 of the Republican Plan of Organization the required publication in a newspaper is waived.

## **Authorization**

This Mass Meeting Call is authorized and paid for by the Warren County Republican Committee. Thomas McFadden Jr. is the Chairman of the Committee. Inquiries or questions may be addressed to Mr. McFadden.  
[chairman.republicancommittee@gmail.com](mailto:chairman.republicancommittee@gmail.com)

**The Official Filing Forms are on the following pages.**

**Warren County Republican Committee  
Official Filing Form  
Mass Meeting, February 12, 2026, 7:00 pm**

I am filing for:

\_\_\_ 6th District Convention Delegate or Alternate (include \$20 fee)

\_\_\_ Committee Chairman (include \$200 fee)

I, \_\_\_\_\_, do hereby declare that I am seeking to be elected to the Republican Party position(s) noted above.

I certify that I am a qualified and registered voter and reside in the City of Warren County. I am in accord with the principles of the Republican Party and intend to support the Republican nominees and endorsees in the next General Election that will be held on November 3, 2026. **Signature** \_\_\_\_\_

All legal and qualified voters of Warren County, Virginia,, under the laws and ordinances of Warren County, the Commonwealth of Virginia and the United States of America, regardless of race, religion, national origin, or sex, who are in accord with the principles of the Republican Party and who, if requested, express in open meeting, either orally or in writing as may be required, their intent to support all its nominees and endorsees for public office in the ensuing election, may participate as members of the Warren County Republican Committee in its mass meetings, party canvasses, conventions, or primaries encompassing their respective Election Districts.

Name: \_\_\_\_\_

Residence Address: \_\_\_\_\_  
\_\_\_\_\_

Mailing Address, if different: \_\_\_\_\_  
\_\_\_\_\_

Email address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Candidates for election as Delegates or Alternates to the 6<sup>th</sup> District Convention or Chairman of the Warren County Republican Committee on February 12, 2026, shall file this Application by mail, email or in person to the Secretary of the Warren County Republican Committee, Scott Lloyd, PO Box 2020, Front Royal, VA 22630, chairman.republicancommittee@gmail.com. **This application form must be received no later than 5:00 pm, Monday, February 2, 2026, for Delegates and Alternates to the 6<sup>th</sup> District Convention and 5:00 pm, January 30, 2026, for Warren County Republican Committee Chairman.**

## Warren County Republican Committee Membership Application

Candidates for election as Members of the Warren County Republican Committee on February 12, 2026, shall file this Application by mail, email or at the Mass Meeting to the Secretary of the Warren County Republican Committee, Scott Lloyd, PO Box 2020, Front Royal, VA 22630, chairman.republicancommittee@gmail.com. **This application form if mailed should be received no later than 5:00 pm, Monday, February 9, 2026, or at the Mass Meeting before the vote to elect new members.**

All those seeking membership to the Committee must pay \$50 annual dues, made payable to the Warren County Republican Committee (WCRC) either by mail, or at the Mass Meeting, or online at <https://www.warrencountyvagop.com> at or before the first regular scheduled WCRC meeting.

Persons who wish to become members of the Committee but are unable to mail, email or attend the Mass Meeting may request membership at a subsequent meeting of the Committee.

### Checks should be made payable to WCRC.

Name (pls print): \_\_\_\_\_

Address: \_\_\_\_\_

Town: \_\_\_\_\_ Zip: \_\_\_\_\_

Home Phone: \_\_\_\_\_ Cell Phone: \_\_\_\_\_

Email Address: \_\_\_\_\_

Magisterial District and Precinct (if known):

\_\_\_\_\_ Fork District: Precinct \_\_\_ Fork Town \_\_\_ Otterburn

\_\_\_\_\_ Happy Creek District: Precinct \_\_\_ Happy Creek \_\_\_ Linden

\_\_\_\_\_ North River District: Precinct \_\_\_ North River \_\_\_ Riverton

\_\_\_\_\_ Shenandoah District: Precinct \_\_\_ East Shenandoah \_\_\_ West Shenandoah

\_\_\_\_\_ South River District: Precinct \_\_\_ Bentonville \_\_\_ Browntown \_\_\_ South River

All legal and qualified voters of Warren County, Virginia,, under the laws and ordinances of Warren County, the Commonwealth of Virginia and the United States of America, regardless of race, religion, national origin, or sex, who are in accord with the principles of the Republican Party and who, if requested, express in open meeting, either orally or in writing as may be required, their intent to support all its nominees and endorsees for public office in the ensuing election, may participate as members of the Warren County Republican Committee in its mass meetings, party canvasses, conventions, or primaries encompassing their respective Election Districts.

**I am in accord with the principles of the Republican Party and intend to support the Republican nominees and endorsees in all General Elections.**

Signature \_\_\_\_\_ Date \_\_\_\_\_

*Authorized and paid for by the Warren County Republican Committee*

# **EXHIBIT D**

# WARNING NOTICE TO CEASE AND DESIST

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From David Silek <dsilek@sileklaw.com>

To Scott Lloyd<scott@lloydlg.com>, David Silek<dsilek@sileklaw.com>

Date Monday, February 16th, 2026 at 7:54 PM

---

Dear Mr. Lloyd:

This letter serves as a formal

**demand that you immediately cease and desist** from any further unauthorized actions in your capacity as Secretary (or purported or lame duck Secretary) of the Warren County Republican Committee (WCRC), including but not limited to:

- **#1 - Accessing, using, or disseminating WCRC records, membership lists, emails, financial information, or other committee property without authorization from the Chairman or Executive Committee.**
- **#2 - issuing statements, correspondence, or communications on behalf of the WCRC, using official letterhead, email addresses (such as secretary.republicancommittee@gmail.com), social media, or any other means implying official authority to act on behalf of the Committee of which you are no longer a member.**
- **#3 - representing yourself as having ongoing authority to act for the WCRC in meetings, public statements, or dealings with third parties."**

As you are aware you are **no longer a member** of the WCRC. Please do not conduct yourself as being a member of the Committee or acting on behalf of the Committee at this time.. Your authority to conduct business due to the absence of the Chair and vice-chair ceased immediately upon my election. Please do not do any thing that amounts to unauthorized conduct and may violate party rules regarding officer eligibility, removal provisions (Article X, Section C I think of the RPV Plan), fiduciary duties, or prohibitions on misrepresentation.

This unauthorized conduct must stop

**immediately** upon receipt of this letter. You are directed to:

1. Cease all such activities outlined herein effective immediately; and
2. Return or destroy any WCRC property in your possession, including records, devices, passwords, or materials on or before the next Committee meeting.

Failure to comply may result in further action, including but not limited to:

- Seeking removal from your officer position pursuant to applicable party rules (e.g., by vote of the committee after proper notice);
- Pursuing any available remedies under Virginia law for e.g., trespass to chattels, conversion of property, breach of fiduciary duty, or other claims as applicable;
- Referral to the Republican Party of Virginia or other authorities if the conduct involves misuse of official party resources or election-related matters.

This is a good-faith effort to resolve this matter without escalation. I urge you to comply promptly to avoid unnecessary conflict.

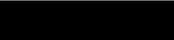
Govern yourself accordingly.

VR,

David W. Silek

# **AFFIDAVITS**

**AFFIDAVIT OF**   
**COMMONWEALTH OF VIRGINIA**  
**COUNTY OF WARREN**

I, , am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

1. This affidavit concerns the Warren County Republican Committee Mass Meeting held on February 12, 2026.
2. I assisted with the check-in and ballot distribution process at the meeting as a member of the Credentials Committee.
3. I did not personally hand out any ballots.
4. Initially, my role was to check identification to determine whether individuals were registered voters, provide them with a Post-it note, and direct them to a second line to receive a yellow ballot.
5. After that, I directed individuals into the appropriate line to receive their ballots.
6. At one point, I attempted to collect the lists of names of individuals who were issued ballots in order to provide those lists to Steve Kurtz.
7. The individuals stationed at the table closest to the door told me that they had not written down any names and were distributing ballots without recording the names of the recipients.
8. Those individuals told me that they had distributed approximately ten to fifteen ballots.
9. I do not know the names of these individuals.
10. I was not provided with instructions regarding the overall ballot-handling process other than checking voter registration.

Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

Date: 2/23/2026



**AFFIDAVIT OF** [REDACTED]  
**COMMONWEALTH OF VIRGINIA**  
**COUNTY OF WARREN**

I, [REDACTED] am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

1. I attended the WCRC mass meeting held on February 12, 2026, in Front Royal, Virginia.
2. My wife, [REDACTED] was present with me at the meeting.
3. During the credentialing and ballot distribution process, my wife and I personally observed a woman in her 50s wearing a blue and white blouse moving from person to person in the meeting area.
4. We observed this woman collecting Post-it notes from individuals.
5. We further observed her writing names on a yellow legal pad while collecting those Post-it notes.
6. The actions we observed were occurring in the area where credentialing and ballot processing were taking place.
7. I asked several individuals present at the meeting to identify the woman and to explain her role. No one I asked was able to identify her.
8. I then located Thomas Ranieri, and we attempted to approach the woman to determine her identity and purpose.
9. Before we were able to speak with her, she moved into a back room located behind the voting area, where we were not permitted.
10. Despite our efforts we were unable to determine her identity or official role in the meeting.
11. It was unclear to me what she was doing with the Post-it notes she collected or the names she recorded.
12. Members of the Credentials Committee whom I questioned were unable to explain her actions or her role in the process.
13. The activities I observed appeared to differ from the credentialing and ballot procedures that had been described to participants.
14. I make this affidavit based upon my personal observations.

Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

Date:

*Feb. 27, 2026*

[REDACTED]

**AFFIDAVIT OF [REDACTED]**  
**COMMONWEALTH OF VIRGINIA**  
**COUNTY OF WARREN**

I, [REDACTED] am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

1. This affidavit concerns the Warren County Republican Committee Mass Meeting held on February 12, 2026.
2. I attended the meeting together with my wife, my mother-in-law, and my father-in-law.
3. During the check-in process, I signed a slip of paper attesting that I supported the principles of the Republican Party. The attestation did not say that I had not voted in a Democratic primary in the previous 5 years.
4. While waiting in line at the registration table, I observed two men standing ahead of me state to the individual checking identification that they did not wish to sign the attestation slips.
5. I heard Crystal Cline state to those two men that they did not need to sign the slips and that the slips were not being used.
6. I observed one of the two men crumple his slip of paper and place it in his pocket.
7. When my wife and I proceeded to check in, we presented our identification and our signed attestation slips.
8. The individual checking our identification did not review or collect our attestation slips.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 2/25/26

[REDACTED]

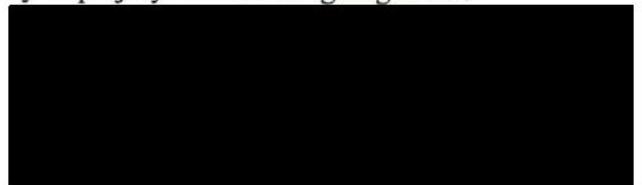
**AFFIDAVIT OF [REDACTED]**  
**COMMONWEALTH OF VIRGINIA**  
**COUNTY OF WARREN**

I, [REDACTED] am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

1. My name is [REDACTED]
2. I have served as a member of the vetting committee of the Warren County Republican Committee ("WCRC") in Front Royal, Virginia.
3. I was sent an email that there was to be a meeting to elect a chairman of the Warren County Republican Committee ("WCRC") at the Firehouse starting at 7pm Feb. 12th.
4. The following happened to me on February 12, 2026.
5. The meeting started at 7pm but I was running late.
6. I arrived about 7:05 pm and as I walked to the door to go in there were two people standing in front of closed doors. One of them was George Cline.
7. As I tried to go around them, and George told me I couldn't go in. I asked him why and he informed me that there are 400 people inside and the fire marshal has said that is the limit and no more people can go in. I asked if he was sure, and he confirmed.
8. I half turned to go and stood there thinking for about 30 seconds.
9. George inquired what I was doing or why I was still there. I told him that I was trying to figure out where I could go so that I could come back and vote later.
10. He told me I wouldn't be able to come back and vote. He informed me that the fire marshal has closed the meeting and nobody who was not in the room currently would be able to vote.
11. I said, "So even after some people vote and leave the building no one is going to be allowed to go in and vote?"
12. He confirmed that that was correct. I just shook my head and said, "Well, there no sense waiting around here then."
13. I walked back to my car and drove home. After getting home I texted Steve Kurtz hoping he would get the message and figure out if I could still get in since it was only 7:30 and the meeting ended at 9.
14. I never heard anything from Steve Kurtz to this day from my text.
15. I make this affidavit based upon my personal knowledge and observations.

Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

Date: 3/10/2026



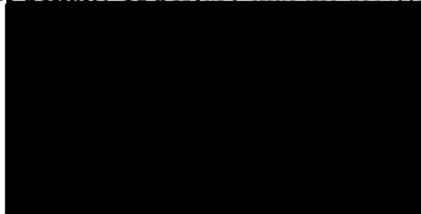
**AFFIDAVIT OF [REDACTED]**  
**COMMONWEALTH OF VIRGINIA**  
**COUNTY OF WARREN**

I, [REDACTED] am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

1. This affidavit concerns the Warren County Republican Committee Mass Meeting held on February 12, 2026.
2. I arrived at the fire station location of the meeting at approximately 6:45 p.m.
3. When I arrived at the entrance, approximately six to eight individuals were waiting outside.
4. One of the individuals waiting outside informed me that the building had reached maximum capacity and that as voters exited, individuals waiting outside would be permitted to enter.
5. Approximately five to six individuals waiting outside with me were parishioners of St. John the Baptist Catholic Church—I recognized them from my attendance and activities at the Church, including my service as an usher.
6. At approximately 7:00 p.m., the gentleman positioned at the entrance informed those of us waiting outside that we would not be permitted to enter.
7. After being told we would not be permitted to enter, I remained at the entrance area for approximately thirty minutes.
8. During that time, I observed approximately twenty additional individuals arrive and be turned away.
9. Based on my personal knowledge, approximately half of those additional individuals were parishioners of St. John the Baptist Catholic Church.

Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

Date: 03/05/2026



**AFFIDAVIT OF SCOTT LLOYD  
COMMONWEALTH OF VIRGINIA  
COUNTY OF WARREN**

I, **Scott Lloyd**, am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

1. This affidavit concerns the Warren County Republican Committee Mass Meeting held on February 12, 2026.
2. I am the immediate past Secretary of the Warren County Republican Committee (“WCRC”), and I make this affidavit based upon my personal knowledge.
3. I was a candidate for the Chairmanship of the Warren County Republican Committee at the Mass Meeting on February 12, having filed a timely application for my candidacy.
4. In the lead-up to the meeting, it was my understanding from the communications that I received that then-Chairman Thomas McFadden would run the meeting, with Steve Kurtz providing support and institutional knowledge as a person who had run and / or attended a Mass Meeting in the past. I understood that Matt Tederick would be the Temporary Chair of the meeting.
5. Steve Kurtz was the Chair of the Credentials Committee, in charge of vetting voters and making sure they were actually Republicans, and ensuring those who were not Republicans would not vote.
6. I had several conversations in person, by phone, and through text with both Tom McFadden, Jr. and Steve Kurtz regarding who would be allowed to vote, and how to ensure that Democrats would not be allowed to vote and thereby tip the election for Chairman.

7. The discussions revolved around whether people would have to affirm that they intend to support Republicans in the upcoming election and whether those who came up in the voter rolls as Democrat would be allowed to vote.
8. I raised two specific issues multiple times in writing: 1) that people sign a pledge indicating they are in accord with Republican principles, and 2) that they indicated they have not participated in a Democratic primary in the past five years.
9. Specifically, on February 10, 2026, at 12:44 p.m. I stated to Mr. Kurtz that “The oath should also include a statement affirming that they have not voted in another primary in the past five years.”
10. Mr. Kurtz responded at 12:56 on the same day, “Yes. That has been added”
11. After Mr. Kurtz responded to another email that, “Not everyone needs to sign the oath. Only the ones that are questionable.”
12. At 5:57 p.m. on February 11, Tom McFadden, Jr. wrote from his Chairman email, “Everyone relax [sic] All people who attend will sign the pledge.” Eric Bartock, myself, and Mr. Kurtz were copied on the email.
13. At 6:15p.m. on February 11, 2026, I sent a text to Mr. Kurtz with a screen shot of the Warren County VA Republican Committee Facebook page which had announced at 1:54 p.m. on February 10 that “Any registered Warren County voter who wishes to vote at the upcoming Mass Meeting on February 12<sup>th</sup> where we will choose a new Committee Chairman will be required to sign a document before receiving a paper ballot to vote.” I asked him by text, “It’s not settled already?”
14. I took this to be the end of the matter, as the person chairing the meeting had spoken definitively and directly to the head of the Credentials Committee in writing. I fully

expected that anyone who was going to vote would sign a pledge that indicated that they supported Republican principles and that they had not voted in the primary of another party in the past five years.

15. Steve Kurtz furthermore indicated to me in person that anyone who was a Democrat would be asked to leave, and they would not be allowed to vote.
16. I understood these comments in his capacity as Committee Chairman who would potentially be called on to vote on any one voter or group of voters and with authority over these matters.
17. I arrived at the Warren County fire hall at about 5:15 p.m. or a little later.
18. Steve Kurtz arrived shortly after I did, as did Tom McFadden, Jr.
19. I focused on helping the Credentials Committee set up, including moving tables to the proper part of the room.
20. I was confused about the lack of direction to the Credentials Committee but remembered that Mr. Kurtz had indicated that he was going to speak to the Credentials Committee before the evening of the vote. I figured that this had occurred.
21. Mr. McFadden and I discussed where in the room the Chairman would run the meeting; we identified a stage in the room and agreed that this was the “front” of the room for the purpose of leading the meeting.
22. We walked up to the front of the room where the stage was. He had a box in his hand for ballots. He began speaking to someone else, so I returned to the “back” of the room where people were checking in. I had some additional questions for Mr. McFadden, including what he would like for me to do with the applications for membership that

would be voted in later that evening. I figured I would wait until he finished his conversation to ask the questions I had.

23. I did not see Mr. McFadden leave the venue, and I had no indication from him or anyone else that he planned to do so.
24. Sometime after 6 p.m. someone asked me a question. I determined that it was a question for the Chairman, so I walked around the entire meeting room, which was by then filled with people, looking for Mr. McFadden. I let the person know that I could not find him.
25. At the time, I thought that he was in another part of the building; I even considered that he was in the bathroom or not feeling well and stepped out of the room which was getting hot from all of the people. I did not think at any time that he had left, because I expected him to open the meeting.
26. The person (I believe it was Amber Vietenthal) renewed his or her inquiry, and I told the person that I did not know where Mr. McFadden was, that I had looked throughout the whole room for him and did not find him.
27. Just before 7p.m., I walked through the stairwell greeting people who were there to vote. The line stretched out of the building, and the people assembled waiting to enter leaned heavily in my favor judging from the amount of people I knew personally in the line.
28. I learned later that one of those supporters left in frustration because they were not letting people into the hall and there was no information reaching the people in the stairwell.
29. At around 7p.m., when it was time to begin the meeting, someone let me know that it was already 7p.m., and since nobody could find Mr. McFadden and the Vice Chair Aiden Miller was not present, it was best for me to open the meeting.

30. Around the same time, someone let me know that the room had reached capacity. Mr. Silek was present for that discussion as was the fire marshal, Deputy Chief Gerry Maiatico. We discussed the possibility of asking those not old enough to vote to leave the room, and the person I was speaking to indicated this could be a problem, since we would have children roaming around the parking lot or mothers leaving with their children after waiting for more than an hour and not getting the chance to vote.
31. Mr. Silek and I decided in the presence of the Assistant Chief that we would proceed to a vote for those who had checked in and once they left, those who were waiting outside the room could come in, check in and vote.
32. I explained to Mr. Silek that I would be opening the meeting since we could not find Mr. McFadden, and I was the senior Committee member in the room. He indicated that he understood.
33. I immediately went to the front of the room and explained that the room was at capacity, and the parties had agreed that those in the room would be allowed to vote. Once those people left, those outside would be allowed to come in to vote.
34. At no point as the Acting Chairman did I instruct anyone to close the door to potential voters or to turn anyone away.
35. There was no vote and no motion to close registration.
36. I proceeded through the rest of the meeting, including my remarks, which I intentionally kept short, according to the assumption that we were working to have the first round of votes happen as quickly as possible so that people waiting outside could vote.

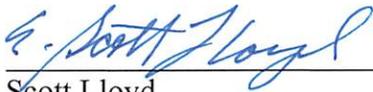
37. After I concluded my remarks and the process began, the “one-in, one-out” arrangement never happened. I learned that the doors had been shut and that prospective voters had been informed that they would not be permitted to vote, and to leave.
38. Following the meeting, I made multiple requests to the Credentials Committee Chairman for the full list of individuals who received ballots. I made these requests at 1:21 a.m., 8:22 a.m., 11:29 a.m., 5:15 p.m., and 7:55 p.m. on February 13, 2026.
39. I copied David Silek on the request at 8:22 a.m.
40. Mr. Kurtz never turned over the information he had, if any.
41. I learned from a member of the Credentials Committee on February 13, 2026, that Mr. Kurtz instructed them to discard the attestation forms and the ballots.
42. Also on February 13, 2026, I returned to the fire hall between 4 and 4:30 p.m. to inquire about any discarded ballots, attestation forms, and any other election material.
43. The personnel indicated that someone had come by the fire hall and removed the trash from the night before.
44. I renewed my request to Steve Kurtz for the list(s) of ballots issued on Monday, February 16, 2026, copying David Silek and John Massoud, Sixth District Chairman. I stated:
- I am asking you [Steve Kurtz] in your capacity as the Chairman of the Credentials Committee to turn over your partial list and 1) identify the other three individuals who were issuing ballots 2) contact them and retrieve the lists they created 3) turn them over to me.
- Mr. Chairman, I am requesting access to the GOP database to check the list of individuals who received ballots against the database to determine whether they have voted in Democratic primaries in the past five years. This is in response to the assertion made by several of the attendees Thursday night that several prominent members of the Warren County Democratic Party casted ballots. I will report any findings back to this group once I am able to check. (Affidavit of Scott Lloyd).

45. I received an email from Mr. Silek in response titled "Warning Notice to Cease and Desist."

46. The email instructed me to cease all activities as Secretary.

Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

Date: 3/11/20

  
\_\_\_\_\_  
Scott Lloyd

**AFFIDAVIT OF [REDACTED]  
COMMONWEALTH OF VIRGINIA  
COUNTY OF WARREN**

I, [REDACTED] am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

- 
3. Based on my professional experience, I have extensive familiarity with the organization and management of large public meetings.
  4. On February 12, 2026, I attended the Warren County Republican Committee (“WCRC”) mass meeting held in Front Royal, Virginia.
  5. In my experience, the February 12, 2026 meeting was the most disorganized and chaotic public meeting I have ever attended.
  6. Tom McFadden, Jr., the outgoing Chairman of the WCRC, was responsible for calling and organizing the Mass Meeting.
  7. Mr. McFadden left the building approximately thirty (30) minutes before the scheduled start of the meeting and did not return.
  8. As a result of his absence, Scott Lloyd—who was one of the two candidates for Chairman and the senior WCRC member present—opened the meeting.

9. Because Mr. McFadden was not present, the meeting was not opened or presided over by the County Chairman as required by the Bylaws.
10. In the week preceding the meeting, it was widely anticipated that there would be a large turnout of supporters for the two candidates for Chairman.
11. In my observation, adequate procedures were not implemented to manage the anticipated turnout.
12. The Credentials Committee appeared insufficiently briefed regarding procedures governing registration and voting.
13. I personally observed voters expressing confusion and frustration because members of the Credentials Committee were unable to answer basic procedural questions regarding how the meeting would be conducted.
14. Based on my observations, the February 12, 2026 meeting was not organized in a manner consistent with the responsibility of the Chairman to open the Mass Meeting.
15. Prior to the meeting, I prepared a two-page document encouraging supporters of Scott Lloyd to attend and vote. That document was distributed to more than 100 individuals. A copy is attached.
16. Five days before the meeting, I telephoned Mr. McFadden and read the document to him in full.
17. Mr. McFadden indicated that the contents of the document were accurate.
18. The document included the following statement:  
  
"Tom McFadden Jr., current chairman of the WCRC, has confirmed that you don't have to be a member of the WCRC to vote in this election — nor do you have to promise to

**join the WCRC to vote. All you have to do to vote is sign a statement that you espouse Republican principles.”**

**19. On the night of the meeting, individuals seeking to vote were required to sign a statement reading:**

**“I intend to support the Republican nominees and endorsees in the next general election to be held on Nov. 3, 2026.”**

**20. In my view, the requirement to affirm intent to support all Republican nominees and endorsees differs materially from merely affirming that one espouses Republican principles.**

**21. The evening of the Mass Meeting, I handed out pledge forms to voters as they came through the door from the outside, with instructions that, “these have to be filled out and signed upstairs in the presence of a Credentialing Committee member after you present a photo ID card.”**

**22. As I was handing out the pledge forms, at least two self-identified Silek supporters indicated that they had “pre-registered” as a result of a form received earlier in the week via email.**

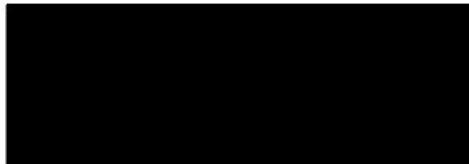
**23. The procedural confusion and inconsistencies described above contributed to disorder at the meeting.**

**24. Based on my observations and professional experience organizing public events, the February 12, 2026, mass meeting was not conducted in an orderly or properly organized manner.**

**25. For these reasons, I believe the validity of the meeting’s results should be reviewed by the appropriate authorities.**

Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

Date: 2-26-2026



**AFFIDAVIT OF [REDACTED]  
COMMONWEALTH OF VIRGINIA  
COUNTY OF WARREN**

I, [REDACTED] am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

1. This affidavit concerns the Warren County Republican Committee Mass Meeting held on February 12, 2026.
2. I attended the location of the Mass Meeting on February 12, 2026, together with my son [REDACTED] who is also over the age of 18.
3. Shortly after 7:00 p.m., I arrived at the firehouse to vote and Joseph and I were turned away and not permitted to enter the building.
4. We asked whether we could wait outside until other individuals exited the building.
5. We were told that we would not be permitted to wait outside, that the voting was closed, and that no one standing outside at that time would be allowed to vote.
6. This information was given to us by an older gentleman standing in front of the doors. I do not know his name or position.
7. While present, I observed other individuals being turned away by the same gentleman.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 2 24 26

[REDACTED]

**AFFIDAVIT OF [REDACTED]**  
**COMMONWEALTH OF VIRGINIA**  
**COUNTY OF WARREN**

I, [REDACTED], am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

1. I provide the following background to explain my familiarity with Republican events and election processes:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

2. I did not publicly endorse any candidate for WCRC Chairman prior to the February 12, 2026 mass meeting. This affidavit should not be interpreted as support for either candidate for Chairman.
3. I arrived at the Front Royal Volunteer Fire Department prior to 7:00 p.m. with my husband.
4. We stood in line outside the building in freezing temperatures. The line extended outside and then up the interior stairwell as we progressed toward registration.
5. While we were still in line, a volunteer came down the stairs and announced that the room was at capacity and that anyone who had not yet made it inside to register would not be allowed to vote.
6. I responded that I had arrived and was in line prior to 7:00 p.m. and expected to be permitted to vote.
7. A short time later, another announcement was made that those already inside the building and in line would be allowed to vote, but those still outside would be turned away.
8. When I reached the credentialing tables, my identification was checked at the first table, and I was given a small torn portion of a Post-it note.

9. I then proceeded to a second table where I was issued a ballot.
10. At a third table, I believed I was to cast my ballot; however, I was handed a second ballot.
11. My husband and I informed the individual that we had already received ballots and declined the second ballot.
12. While standing in the meeting room, I observed individuals whom I recognized from prior elections as active participants supporting Democratic candidates at polling locations.
13. I was concerned that individuals who appeared to be political opponents were present while some individuals who identified as Republicans had been denied entry due to capacity limitations.
14. I reported my concerns to Steve Kurtz and John Massoud.
15. I took photographs and video of at least one individual casting a ballot whom I recognized from prior elections as a Democratic activist.
16. I reported my concerns to Matt Tederick.
17. I expressed to Scott Lloyd that I believed a formal complaint should be filed before the winner was announced.
18. My concern at that time was the integrity of the election process, not the identity of the winning candidate.
19. During the reading of the names of newly selected WCRC members, I heard multiple names that I recognized as individuals who have previously opposed Republican candidates.
20. I also observed individuals in the audience expressing concern that they had submitted applications to join the WCRC but had not been accepted.
21. One individual stated that he had been accepted but that his spouse, who applied at the same time, had not.
22. Another individual stated that he had paid and registered online in advance but did not receive a position.
23. I did not observe a vote on individual membership names.
24. I was not aware prior to the meeting of any rule change limiting the number of WCRC members.

25. During the meeting, Cheryl Cullers read the rules aloud; however, the microphone was not functioning properly, she spoke very softly, and many individuals, including myself, stated that we could not hear her clearly.

26. I did not see any rule change listed in the published call for the meeting.

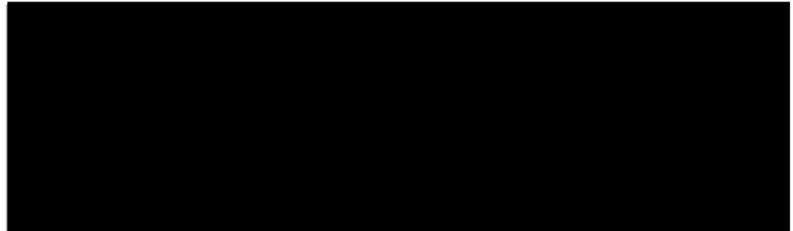
27. I do not believe in contesting elections simply because of dissatisfaction with the outcome.

28. However, based upon my observations, the election process was disorganized and lacked the safeguards I would expect to ensure integrity and transparency.

29. I make this affidavit based upon my personal knowledge and observations.

Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

Date: 3/4/26



**AFFIDAVIT OF [REDACTED]**  
**COMMONWEALTH OF VIRGINIA**  
**COUNTY OF WARREN**

I, [REDACTED] am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

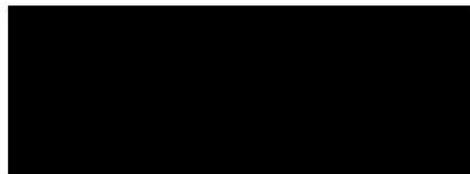
1. My name is [REDACTED]
2. On February 12, 2026, I served as a member of the Credentials Committee at the special mass meeting of the Warren County Republican Committee ("WCRC") held in Front Royal, Virginia.
3. I was invited to serve on the Credentials Committee as a designee of Scott Lloyd and accepted.
4. I was instructed to arrive at the Firehouse at approximately 5:30 p.m. and to bring my laptop computer. I was told that there would be ten (10) members of the Credentials Committee: five selected by Mr. Lloyd and five selected by Mr. Silek.
5. Although I provided my contact information ahead of time to receive communication from the head of the Credentials Committee, I did not hear from him.
6. When I arrived at approximately 5:40 p.m., the parking lot was nearly full.
7. Upon entering the meeting room, I observed more than 100 people already present. I observed a lack of organization and did not receive instructions regarding procedures.
8. [REDACTED]
9. We were given a website to consult for vetting voters. No one knew the Firehouse Wi-Fi password, so we used personal hotspots to attempt to access the database.
10. I was not provided specific instructions on how to screen individuals, including whether residency requirements applied.
11. Lines began forming and grew long. Individuals became frustrated. It appeared that no clear authority was directing the process.
12. At some point, Post-it notes were distributed. I was told to give a Post-it note to each person whom I had screened in the database.

13. Many individuals presented a signed attestation stating that they supported Republican nominees. I was not instructed whether to collect these attestations or allow individuals to retain them. When I asked for guidance, no definitive instruction was given. The attestation that was handed out to prospective voters did not contain a statement that anyone who had previously voted in a Democratic primary in the last five years was renouncing that affiliation.
14. After screening individuals, I provided them with a Post-it note (or portion thereof, due to limited supply) and directed them to join a separate line to receive a ballot from Steve Kurtz.
15. It became apparent that it was difficult for one person to enter names into the Excel spreadsheet before issuing ballots. I offered to assist.
16. Eventually, Steve Kurtz moved to the end of the table. At that point, [REDACTED] and I were permitted to assist in processing individuals in the ballot line and issuing ballots.
17. When issuing ballots, I checked identification when presented, reviewed attestation forms if provided, typed the individual's name into a Word document on my laptop, and provided a ballot.
18. Ballots were taken in groups from an envelope as needed. To my knowledge, there was no contemporaneous count maintained of ballots distributed from that envelope as they were handed to committee members.
19. At some point, additional individuals began assisting in processing the ballot line.
20. When the time came to tally the total number of ballots issued, Steve Kurtz had written down six separate totals representing ballots distributed by the six members of the Credentials Committee who had been handing out ballots.
21. The numbers written were: 62, 139, 54, 15, 68, and 87.
22. Steve Kurtz added these numbers. I also calculated the total using my phone calculator.
23. The correct total was 425. My phone calculator displayed 425. After re-adding the numbers, Steve Kurtz also confirmed the total as 425.
24. Steve Kurtz then left to report that total.
25. From the back of the room where I had been checking in voters, I was not able to hear what Mr. Kurtz reported to the floor.
26. After the total had been reported, several individuals approached requesting ballots. We informed them that the total had already been finalized and they could no longer vote.

27. Some of these individuals indicated that they had been present earlier in the evening but did not understand that they were required to obtain the small gold ballot slip.
28. At approximately 7:00 p.m., I heard that the Fire Marshal had determined that no additional individuals could be allowed into the building due to capacity limits.
29. I observed discussion about whether individuals could be admitted as others exited the building; however, I did not observe that this occurred.
30. I am aware that individuals remained outside the building who wished to vote but were not admitted. I do not know the exact number.
31. Prior to the tally, I offered to provide Steve Kurtz with the list of names I had typed into my Word document and to assist in entering those names into his spreadsheet. He declined and stated that he only needed the total numbers.
32. I still possess the Word document containing the names of individuals to whom I issued ballots. I am unaware if others also maintained such records.
33. [REDACTED] maintained a handwritten list and retained certain attestation forms.
34. I left the meeting before the counting of the ballots due to responsibilities at home.
35. Based on my observations, there was significant confusion in the credentialing and ballot distribution process.
36. I observed that some individuals who wished to vote were unable to do so.
37. The number of individuals unable to vote appeared to be substantial; however, I do not know the precise number.
38. I make this affidavit based upon my personal knowledge and observations.

Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

Date: 03/10/26



AFFIDAVIT OF [REDACTED]

COMMONWEALTH OF VIRGINIA

COUNTY OF Warren

I, Peter Schofield, being first duly sworn, depose and state as follows:

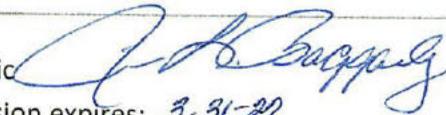
1. On February 12, 2026, I intended to vote in the election for Chairman of the Warren County Republican Committee ("WCRC") mass meeting.
2. At approximately 7:00 p.m., I departed my residence located in Front Royal, Virginia, to attend the meeting.
3. I arrived at approximately 7:15 p.m. at the Front Royal Volunteer Fire Department, the designated location for the event.
4. Upon arrival, I was informed by individuals stationed at the entrance that I was not permitted to enter the building because it was over capacity.
5. I was further informed that even if individuals exited the building, I would not be allowed to enter.
6. [REDACTED] who arrived with me, was also denied entry.
7. I observed at least six other individuals who appeared to have been denied entry for the same reason, as well as additional individuals returning to their vehicles after being turned away.
8. After initially leaving, I returned to my office to obtain paper so that I could collect names or signatures from other individuals who had been denied entry in order to preserve a record of the events.
9. When I returned to the fire department, I observed several individuals in the parking lot discussing the situation.
10. I spoke with an unidentified couple who were attempting to determine why they were not being permitted to vote.
11. At that time, a man exited the building and informed those present that there had been a registration period from 6:00 p.m. to 7:00 p.m., and that registration had closed at 7:00 p.m.
12. Neither I nor the unidentified couple were aware that registration would close at 7:00 p.m.

13. The public notice I had seen stated that registration began at 6:00 p.m. and that the meeting was scheduled to begin at 7:00 p.m. No notice I received indicated that registration would close at 7:00 p.m.
14. Had I been aware that registration would close at 7:00 p.m., I would have arrived earlier to ensure the opportunity to vote.
15. The explanation regarding a 7:00 p.m. registration cutoff was presented as an additional reason for denying me entry, beyond the initial explanation that the building was over capacity.
16. The unidentified couple was eventually permitted to enter the building after questioning those at the entrance; however, they were informed that they would not be permitted to vote due to the asserted registration deadline.
17. I remained at the premises until approximately 8:15 p.m., at which time I departed without being afforded the opportunity to vote.
18. I make this affidavit based upon my personal knowledge and observations.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

  
Subscribed and sworn before me this 20<sup>th</sup> day of February, 2026.

Notary Public

  
My commission expires: 3-31-27

**AFFIDAVIT OF [REDACTED]**  
**COMMONWEALTH OF VIRGINIA**  
**COUNTY OF WARREN**

I, [REDACTED] am over 18 years of age and am of sound mind and otherwise competent to provide the following declaration and state as follows:

1. This affidavit concerns the Warren County Republican Committee Mass Meeting held on February 12, 2026.
2. I served as a member of the Credentials Committee for the meeting.
3. The introduction of sticky notes to certify voters was thrust upon many members of the credentialing without any notice or instruction. Hence, the confusion arose later that the sticky note was a ballot.
4. I did not see a complete list of all individuals who were issued ballots.
5. One member of the Credentials Committee, Steve Kurtz, distributed ballots until near the end of the process, at which time additional lanes were opened.
6. The Credentials Committee did not take a vote on the Credentials Committee report before presenting it on the floor.
7. The final count of individuals admitted to the meeting was not communicated to the Credentials Committee until the report was presented on the floor.
8. The only opportunity to object to potential voters was provided during the individual check-in process.
9. Any opportunity for members of the Credentials Committee to object to ballots after issuance was not communicated to me.
10. No formal votes were taken by the Credentials Committee regarding objections to individual voters.
11. To my understanding and from my estimation, the tables turned away more than three dozen individuals who were profiled by the GOP Data Center as "Strong Democratic," possibly more who were profiled as "Lean" or "Weak Democratic." I saw those same individuals with ballots, implying that they had been checked in after being turned away initially.

12. I personally observed people I understood to be prominent members of the Democrat party cast votes—these include Bertha Jenkins, Dominic Ruibal, Jason Neale, and Bob Hill. I understand Dominic Ruibal has been active on social media attacking the Republican Party and promoting Democratic policies. From my vantage point as an active member of the Republican Party in Warren County and the Sixth District Committee, I understand Bertha Jenkins to be one of the largest contributors in Warren County to Democratic politicians and causes. I understand Jason Neale was profiled as “Strong Democratic” in the GOP Data Center. I recall viewing on social media photographs of Bob Hill holding signs at Democratic Committee meetings declaring “I have seen better cabinets at IKEA.” I have witnessed him publicly promote the Warren County Democratic Committee on social media, alongside serving as the Democratic appointee to the Electoral Board. None of these activities ceased in the lead-up or aftermath of the meeting.
13. It is my understanding that many of the dozens of people who were turned away over capacity issues were Republican voters, and people I understand to be Democrat voters from their public statements and records at check-in remained in the room during the meeting while these Republicans were refused entry because of capacity issues.
14. On instruction from the Chairman of the Credentials Committee, I went and closed the exterior door at 7:00pm. There was no one waiting outside the building at the closing of the door. I informed everyone in line inside the building that they would be allowed to vote.
15. I was informed that no one who was not already in the building could vote once the doors were closed.
16. When I returned upstairs the Warren County Assistant Fire Chief (Fire Marshal) was informing potential voters with pledge forms already signed that they would not be allowed in the room.
17. To my understanding, this decision of the Warren County Assistant Fire Chief (Fire Marshal) was changed shortly afterwards, but according to witnesses there were already individuals who had left. Some attempted to return once hearing of the change, but were turned away due to having left the building.
18. At the same time, numerous other people who had briefly left the building were allowed to return, given that they had already been in the building.

Pursuant to Va. Code § 8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

Date: Tuesday, March 10, 2026

