

From: "McMullen, Austin" <AMcMullen@bradley.com>
Date: September 9, 2022 at 1:26:15 PM EDT
To: Christopher Richards <musikbiz@mac.com>
Subject: FW: Williamson County

See Scott's response to me, and then my response back to him

Austin L. McMullen
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From: McMullen, Austin
Sent: Friday, September 9, 2022 12:25 PM
To: Scott Golden <golden@tngop.org>
Subject: RE: Williamson County

Scott,

Thanks for this response. Is it correct to say that you have not received any challenges to bona fide status in connection with the upcoming Williamson County convention?

A call might be helpful about the rules you linked below, and I'm available most of the day today until 5pm. Or I have availability over the weekend. Here are a few questions I have after reading Rule D, and the County Party's answers to some of those questions.

Rule D isn't written in the context of the special nominating convention that the WCRP has scheduled. It is written for the every-other-year county reorganization process. I understand the desire to use these procedures, but it's like putting a square peg in a round hole. With some clarification, Rule D could work. Here are some of the specifics that need to be clarified...

Will the WCRP special nominating convention be a mass convention or a delegated convention? TRP Bylaws, Rule D, Part I, Section 2 (WCRP Bylaws, Art. X, Part I, Section 2) expresses a preference for mass conventions over delegated conventions. Delegated conventions are only allowed if approved by the State Chairman. If this will be delegated convention, did you approve this to be a delegated convention? The August 30 email from the WCRP refers to this as a "Mass Convention." When I spoke with WCRP counsel Sean Aiello about it yesterday, he said this would be a mass convention for one county commission district, not a delegated convention. If this is a delegated convention, then the procedures become much more complicated because precinct conventions are required in advance of the county convention. The August 30 email from the WCRP includes an agenda but doesn't say anything about precinct conventions.

If this is a mass convention, then my understanding is that TRP Bylaws Rule D, Part II (WCRP Bylaws, Art. X, Part II) and TRP Bylaws, Rule D, Part III, Section 2(B) (WCRP Bylaws, Art. X, Part III, Section 2(2)) would not apply because those apply only to delegated conventions. Do you agree?

The duties of the Contest and Credentials Committee are listed in TRP Bylaws, Rule D, Part I, Section 4

(WCRP Bylaws, Art. X, Part 1, Section 4). Those duties all involve precinct conventions, which are part of a delegated convention. If this is a mass convention, then the Contest and Credentials Committee has no role.

The final determination concerning an individual's bona fide Republican status shall be determined by a majority vote of the State Chairman and the applicable SEC members. TRP Bylaws, Art. IX, Section 1, unnumbered paragraph after sub-section C (WCRP Bylaws, Art. VI, Section 2, unbulleted paragraph after the second bullet). As a result, a challenge to the bona fide status is to be decided by the State Chairman and the applicable SEC members, not a Contest and Credentials Committee. Please let me know if you disagree.

I would request a copy of any other rules, instructions or interpretations of bylaws that will be used in connection with the upcoming Williamson County convention.

If you'd like to schedule a call please let me know, or just call me directly. Thank you, - Austin

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From: Scott Golden <golden@tngop.org>
Sent: Friday, September 9, 2022 11:22 AM
To: McMullen, Austin <AMcMullen@bradley.com>
Subject: Re: Williamson County

CAUTION - EXTERNAL EMAIL

Austin -

I've encouraged all interested to read Rule D of the TNGOP bylaws... It lays the process by which the convention/caucus will run.

The State Party does not determine the Bona Fide status of either candidates or delegates. That job is left with Contest and Credentials committee that is appointed by the CEC.

Hopefully, Rule D will give everyone a better explanation of the process. Nonetheless, I plan on being there to troubleshoot any potential conflicts.

<https://storage.googleapis.com/production-constantcontact-v1-0-6/696/550696/BunSGqbF/ebdde41249644b3886b76d287ed3923c?fileName=WEBSITE%20COPY%20TRP%20Bylaws%20Updated%20December%2016,%202020-6.pdf>

Let me know if you questions... thanks.

sg

From: "McMullen, Austin" <AMcMullen@bradley.com>
To: "golden@tngop.org" <golden@tngop.org>
Sent: 9/9/2022 5:32 AM

Subject: Williamson County

Chairman Golden,

Please advise if you have received any challenges to bona fide status in connection with next week's Williamson County convention.

If so, please forward a copy. Or if it's more convenient, please send a list of the voters challenged, the individuals who made the challenge, and the date the challenge was received.

If you have resolved any challenges, please let me know the outcome.

I am available to discuss this request or any related issues and can be reached at 615-252-2307. Thank you,
- Austin

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