

CAUSE NO. C2024193

ROBERTA ZAMARRON,	§	IN THE DISTRICT COURT
ROBERT GRANGER,	§	
PRECINCT 112 CHAIRMAN,	§	
BRAD YARBOROUGH,	§	
PRECINCT 409 CHAIRMAN,	§	
and MARK JACKSON,	§	
PRECINCT 404 CHAIRMAN	§	
 	§	
v.	§	355TH JUDICIAL DISTRICT
 	§	
GREG HARRELL,	§	
CHAIRMAN OF THE HOOD	§	
COUNTY REPUBLICAN	§	
PARTY, THE HOOD COUNTY	§	
REPUBLICAN PARTY,	§	
STEPHANIE COOPER,	§	
ELECTIONS	§	
ADMINISTRATOR, and	§	HOOD COUNTY, TEXAS
MELANIE GRAFT	§	

**PLAINTIFFS' FIRST AMENDED VERIFIED PETITION FOR
DECLARATORY JUDGMENT, PETITION FOR WRIT OF MANDAMUS, AND
APPLICATION FOR INJUNCTIVE RELIEF**

TO THE HONORABLE DISTRICT COURT:

Plaintiffs, ROBERTA ZAMARRON, ROBERT GRANGER, PRECINCT 112 CHAIRMAN OF THE HOOD COUNTY REPUBLICAN PARTY, BRAD YARBOROUGH, PRECINCT 409 CHAIRMAN OF THE HOOD COUNTY REPUBLICAN PARTY, and MARK JACKSON, PRECINCT 404 CHAIRMAN OF THE HOOD COUNTY REPUBLICAN PARTY, hereby file Plaintiffs' First Amended Verified Petition for Declaratory Judgment, Petition for Writ of Mandamus, and Application for Injunctive Relief complaining of Defendants, GREG HARRELL, in his

capacity as Chairman of the Hood County Republican Party, the HOOD COUNTY REPUBLICAN PARTY, STEPHANIE COOPER, in her capacity as Elections Administrator, and MELANIE GRAFT and respectfully shows the Court as follows:

DISCOVERY CONTROL PLAN SELECTION

1. Plaintiff intends that this suit be governed under the procedures set forth in the Texas Election Code.

PARTIES AND SERVICE OF PROCESS

2. Plaintiff, ROBERTA ZAMARRON, is a resident of Hood County, Texas and is the currently serving District Clerk of the 355th Judicial District.

3. Plaintiff, ROBERT GRANGER, is a resident of Hood County, Texas, and the current Precinct 112 Chairman of the Hood County Republican Party.

4. Plaintiff, BRAD YARBOUROUGH, is a resident of Hood County, Texas, and the current Precinct 409 Chairman of the Hood County Republican Party.

5. Plaintiff, MARK JACKSON, is a resident of Hood County, Texas, and the current Precinct 404 Chairman of the Hood County Republican Party.

6. Defendant, GREG HARRELL, is being sued in his capacity as Chairman of the Hood County Republican Party, is before the court, and may be served through his counsel, Eric Opiela.

7. Defendant Hood County Republican Party (hereinafter the “Party”), is a political party organized in Hood County and has been served with citation.



8. Defendant, STEPHANIE COOPER, in her capacity as Elections Administrator only, has appeared, and may be served through the 355th Judicial District Attorney, Ryan Sinclair, 1200 W. Pearl Street, Granbury, Texas 76048.

9. Defendant, MELANIE GRAFT, may be served with process at 3815 Buena Vista Cir., Granbury, Texas 76049.

10. Plaintiffs request that the Court issue Citation for Melanie Graft and that Graft be served with process of this suit, along with a copy of the Court's Order Setting Final Hearing.

JURISDICTION AND VENUE

11. This Court has subject matter jurisdiction.

12. Venue is proper in Hood County, Texas.

EXHIBITS

13. Plaintiffs attach the following exhibits which are incorporated herein as if restated in full verbatim:

- a. Affidavit of Robert Granger
- b. Affidavit of Roberta Zamarron
- c. The Hood County Republican Party Bylaws
- d. Written Demand to Chairman Greg Harrell

STATEMENT OF FACTS

14. Tonna Hitt Newman took office as the District Clerk for the 355th Judicial District on January 1, 1991. Newman, a fixture in the 355th Judicial District Court, held that seat until her tragic passing on Sunday, February 18, 2024. The task



of appointing a replacement to fill the seat that Newman held for more than 30 years fell to the Honorable Bryan Bufkin, District Judge of the 355th Judicial District Court.

15. On March 12, 2024, Judge Bufkin fulfilled his duty and appointed Roberta Zamarron as District Clerk. Zamarron took her oath of office on March 20, 2024. Although new to her post as District Clerk, Zamarron is not an unknown figure in the Hood County Judicial system. Zamarron has worked for the Hood County Attorney's Office since 2017, and had served as its office manager since 2019. Among other reasons, Judge Bufkin is cited as having selected Zamarron over other candidates because, in addition to being a strong conservative, she has experience working in the courthouse and is a team leader.

16. Due to the timing of Newman's unfortunate passing, the office of District Clerk was not included on the 2024 primary ballot, but must be included on the November 2024 general election ballot to elect a person to serve the remainder of Newman's unexpired term. On June 26, 2024, the Hood County Republican Executive Committee held a meeting entirely in executive session to receive nominations and vote for the Republican candidate for the District Clerk during the November 2024 election cycle. In the process, two persons were nominated to be the Republican Party candidate: Zamarron and Melanie Graft.

17. Unlike Zamarron, Graft, the Precinct 408 Chair, is an officer in the Hood County Republican Party and a current member of the Granbury Independent School District Board of Trustees. Notably, while Graft advocated for herself as a candidate for nomination before the Executive Committee, she did not previously apply to serve



as the interim-District Clerk. As result, she did not participate in the interview process with Judge Bufkin or seek the appointment.

18. Members of the Hood County Republican Party's Executive Committee voted by way of a secret ballot. The voting portion of the executive session, in which Graft participated, resulted in a 7-to-7 tie between Zamarron and Graft. Note, three members of the Executive Committee were not present during the vote. Rather than reconvening at a later date when all Executive Committee members could be present, a revote was taken, again with Graft participating, which resulted in Graft prevailing 8-to-6.

19. Following the June 26, 2024, members of the Executive Committee attempted to work with Chairman Harrell to rectify the errors and illegality in the candidate nomination and voting process. Unable to obtain any response from Chairman Harrell, Precinct 409 Chairman, Brad Yarborough, made written request for Chairman Harrell to take action to remedy the injustice. Chairman Harrell has not, however, responded or taken any further action.

CONDITIONS PRECEDENT

20. All conditions precedent to Plaintiffs' claims have been performed or have occurred.

ARGUMENT

21. Plaintiff incorporates herein all facts stated above as if restated in full verbatim. Section 202.006 of the Texas Election Code sets forth the circumstances in which a political party's state, district, county, or precinct executive committee may



select a candidate for public office. To the extent applicable, Subchapter B, Chapter 145 of the Texas Election Code sets forth the procedure whereby the appropriate executive committee selects the party's candidate.

A. GRAFT NOT ELIGIBLE TO SERVE AS PRECINCT CHAIRMAN AND MEMBER OF THE EXECUTIVE COMMITTEE DURING THE CANDIDATE NOMINATION AND VOTING PROCESS

22. Under Texas Election Code § 161.005, to serve as an officer of a political party a person must not be a candidate for nomination or election to an elective office of the federal, state, or county government.¹ For purposes of that specific statute, a person becomes a candidate if “the person is nominated by a convention or executive committee.”² Here, upon becoming a candidate, Graft became ineligible to serve as a precinct chairman and member of the Executive Committee. Only the members of the Executive Committee are permitted to participate in the candidate nomination and voting process.³ Since Graft became ineligible to serve as a precinct chair and member of the Executive Committee, her vote during the candidate nomination process constituted an illegal vote.

B. THE SELF-APPOINTMENT DOCTRINE PROHIBITS THE EXECUTIVE COMMITTEE'S SELECTION OF GRAFT AS CANDIDATE FOR DISTRICT CLERK

23. Texas law has long maintained a prohibition against self-appointment. Self-appointment, along with self-employment, and conflicting loyalties, make up the

¹ Tex. Elec. Code § 161.005(a)(1) (West 2023).

² *Id* at § 161.005(a)(b)(2).

See id at § 145.036(a) (providing that “the political party’s state, district, county, or precinct executive committee, as appropriate for the particular office, may nominate . . .”).



three categories of common-law incompatibility. The self-appointment category of incompatibility finds root in the Texas Supreme Court’s decision in *Ehlinger v. Clark*⁴ where the Court observed that “because of the obvious incompatibility of being both a member of a body making the appointment and an appointee of that body that the courts have with great unanimity throughout the country declared that all officers who have the appointing power are disqualified for appointment to the offices to which they appoint.”⁵ There, the Court wrote that: “We think the employment of the county judge as an attorney by the commissioners’ court, over which he presided, comes clearly within the rule that the appointing power, in this instance the commissioners’ court, cannot appoint as its attorney one of its own members, to wit, the county judge.”⁶ Since the commissioners’ court appointment of the county judge as an attorney violated common-law incompatibility – the self-appointment prohibition – the Court held his employment contract void.⁷

C. THE HOOD COUNTY REPUBLICAN PARTY BYLAWS PROHIBITED THE EXECUTIVE COMMITTEE’S NOMINATION OF GRAFT AS CANDIDATE FOR DISTRICT CLERK

24. Article IV of the Hood County Republican Party Bylaws expressly provides that a member of the Executive Committee “cannot be a holder of an elected public office or a candidate for such office at the county, state or federal level.” Unlike



⁴ 8 S.W.2d 666 (Tex. 1928).

⁵ *Id.* at 674.

⁶ *Ehlinger*, 8 S.W.2d at 565.

⁷ *Id.* at 565-66.

the Texas Election Code, the Bylaws do not define “public office” or “candidate.” Applying the plain and ordinary meaning of both terms, Graft is ineligible to serve as a member of the Executive Committee under the Bylaws. Indeed, as an elected member of the Board of Trustees of Granbury Independent School District, Graft is a “holder of an elected public office.” Additionally, Graft being nominated made her a “candidate” for District Clerk. Accordingly, Graft’s participation, as a member of the Executive Committee, in the voting process constituted an ultra-vires act.

DECLARATORY JUDGMENT

25. Plaintiffs incorporate herein all facts stated above as if restated in full verbatim. Pursuant to the provisions of Chapter 37 of the Texas Civil Practice and Remedies Code, Plaintiffs seek a judgment declaring that the nominations and voting process that the Hood County Republican Party Executive Committee utilized in selecting a Republican Party candidate for nomination for office of the 355th Judicial District Clerk violated the Texas Elections Code, the Hood County Republican Party Bylaws, and the Self-Appointment Doctrine. This matter is ripe for adjudication and a judicial declaration will resolve the controversy. Plaintiffs contend that Graft could not simultaneously serve on the Board of Trustees of the Granbury Independent School District, as the Precinct 408 Chairman, a member of the Executive Committee, and be a candidate for nomination for the 355th Judicial District Clerk.

26. Even if, assuming for argument only, Graft can be an elected member of the Board of Trustees, the elected Precinct 408 Chairman, and a member of the Executive Committee, she cannot also “be a candidate for nomination or election to



. . . an elective office of federal, state, or county government.”⁸ Upon Graft becoming the candidate for nomination, she became ineligible to serve as the elected Precinct 408 Chairman and member of the Executive Committee. Indeed, Graft’s candidacy for the nomination constituted an automatic resignation or otherwise rendered her ineligible to serve as the Precinct 408 Chairman and member of the Executive Committee. As a result, Graft could not lawfully participate or vote on those persons nominated to be the Republican Party nominee or candidate for the Office of District Clerk.

27. Even if, again assuming for argument’s sake, Graft’s nomination did not make her ineligible to participate or serve as the Precinct 408 Chairman or member of the Executive Committee and vote for those persons nominated to be the Republican Party nominee for District Clerk, the self-appointment doctrine prohibited the Party from selecting Graft as its nominee or candidate for election to the District Clerk’s office.

28. Note, in *Ehlinger*, the result is not automatic resignation of the prior office – that is, the county judge’s employment as an attorney did not result in automatic resignation as county judge.⁹ Rather, if the incompatibility that precludes holding the second office is “self-appointment,” then the appointment to the second office would be altogether void. In that case, the first office is not relinquished since



⁸ See Tex. Elec. Code § 161.005(a)(1).

⁹ See *Ehlinger*, 8 S.W.2d at 565-66

the appointment to the second never had effect.¹⁰ Here, assuming that Graft being a candidate for nomination did not trigger automatic resignation, she remained the Precinct 408 Chairman and member of the Executive Committee, but the “self-appointment” category of incompatibility rendered her nomination void.

29. Plaintiffs further contend that the Bylaws prohibited Graft from being nominated and then participating in the voting process. Plaintiffs further contend that, under the Bylaws, Graft is not eligible to serve as member of the Executive Committee.

30. Ultimately, Plaintiffs request that the Court declare that Roberta Zamarron is the individual entitled to have her name printed on the ballot during the 2024 General Election as the Republican Party candidate for the 355th Judicial District Clerk. Plaintiffs request that the Court declare that Zamarron is the Republican Party nominee and candidate for District Clerk.

PETITION FOR WRIT OF MANDAMUS

31. Plaintiffs incorporate the facts recited above as if restated verbatim. Under Texas law, a district court is vested with original mandamus jurisdiction over county officials.¹¹ A district court may issue a writ of mandamus to compel a public official to perform a ministerial act.¹² An act is ministerial when the law clearly spells



¹¹ *Town of Annetta South v. Seadrift Development Corp.*, 446 S.W.3d 823, 832 (Tex. App.—Fort Worth 2014, pet. denied); *Vondy v. Comm'rs Court of Uvalde Cnty.*, 620 S.W.2d 104, 109 (Tex. 1981) (citing former Tex. Const. art. V, § 8).

¹² *Annetta South*, 446 S.W.3d at 832 (citing *Sheppard v. Thomas*, 101 S.W.3d 577, 580 (Tex. App.—Houston [1st Dist.] 2003, pet. denied)).

out the duty the official must perform with sufficient clarity that nothing is left to the exercise of discretion.¹³

32. The Executive Committee of the Hood County Republican Party had a ministerial act to select the Republican Party's candidate in the 2024 general election for 355th Judicial District Clerk in accordance with Texas law. Chairman Harrell, as well as the other members of the Executive Committee, had a duty to ensure that only those individuals eligible to serve as members of the Executive Committee participated and voted for the nominee to run for District Clerk. Since Chairman Harrell and the Hood County Republican Party Executive Committee failed to carry out its ministerial duty, this Court should issue a Writ of Mandamus.

**APPLICATION FOR TEMPORARY RESTRAINING ORDER AND
TEMPORARY AND PERMANENT INJUNCTION**

33. Plaintiffs incorporate the facts recited above as if restated verbatim. Under Texas Election Code 273.081, a "person who is being harmed or is in danger of being harmed by a violation or threatened violation of this code is entitled to appropriate injunctive relief to prevent the violation from continuing or occurring."

34. Plaintiffs seek a temporary restraining order and, after a hearing, a temporary injunction, that:

- a. Enjoins all Defendants from destroying any files, documents, records, or other material and evidence regarding the nomination and voting process for office of the 355th Judicial District Clerk during the meeting



Id.

of the Executive Committee of the Hood County Republican Party, including any and all correspondence, text messages, emails, or other forms of written communication.

- b. Enjoins Chairman Harrell from tendering any document, communicating, or otherwise certifying to the election administrator that Melanie Graft is the Republican Party Candidate for the office of the 355th Judicial District Clerk, or otherwise taking any action to have Melanie Graft included on the November 2024 general election ballot as the candidate for office of the 355th Judicial District Clerk.
- c. Enjoins Elections Administrator Stephanie Cooper from printing, preparing, mailing, certifying, issuing, or circulating any ballots that include Melanie Graft as the Republican Party's candidate for 355th Judicial District Clerk.

35. Plaintiffs request that the temporary injunction be converted into a permanent order after a trial of this case. Plaintiffs' application for temporary restraining order and injunction are authorized under Texas Civil Practice and Remedies Code § 65.011 and Texas Elections Code § 273.018, which provides that "[a] person who is being harmed or is in danger of being harmed by a violation or threatened violation of this code is entitled to appropriate injunctive relief to prevent the violation from continuing or occurring."



36. Plaintiffs are likely to prevail in their suit for declaratory judgment against Defendants because Defendants' actions violated the Texas Elections Code, the Hood County Republican Party Bylaws, and the Self-Appointment Doctrine.

37. If Zamarron's name does not appear on the November 2024 ballot as the Republican Party candidate, she will suffer irreparable injury. Plaintiffs, especially Zamarron, have no adequate remedy at law. Money damages will not suffice to prevent the damages that will result if Zamarron's name is not included as the Republican Party candidate on the November 2024 ballot. Moreover, it is necessary that the Court take immediate action because, if Zamarron's name is not included on the November 2024 ballot before those ballots are printed and mail-in ballots are sent, it will be impossible for Zamarron to be included as the Republican Party candidate in the November 2024 election.

38. The irreparable injury to Zamarron is imminent, as the Chair of the Hood County Republican Party must certify to the election administrator the Republic Party's candidate for office of the 355th Judicial District Clerk.

39. Plaintiffs are willing to post a bond prior to the issuance of the injunctive relief requested herein to mitigate any potential harm to Defendants.

ATTORNEY FEES

40. As a consequence of Defendants' acts and omissions, Plaintiffs have been forced to retain the services of legal counsel. In accordance with Chapter 37 of the Texas Civil Practice and Remedies Code, Plaintiffs seek to recover from Defendants all costs and attorney fees incurred in the trial court and on appeal.



PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiffs, ROBERTA ZAMARRON, ROBERT GRANGER, PRECINCT 112 CHAIRMAN OF THE HOOD COUNTY REPUBLICAN PARTY, BRAD YARBOROUGH, PRECINCT 409 CHAIRMAN OF THE HOOD COUNTY REPUBLICAN PARTY, and MARK JACKSON, PRECINCT 404 CHAIRMAN OF THE HOOD COUNTY REPUBLICAN PARTY, pray that Citation issue and that Defendants be served with process. Plaintiffs further pray that, upon final hearing, the Court grant the declaratory relief requested herein along with a permanent injunction and writ of mandamus as requested herein, together with any other relief necessary to carry into effect, or otherwise enforce this Court's judgment, and award to Plaintiffs any and all other relief to which Plaintiffs may be entitled, either at law or in equity.

Respectfully submitted,

/s/ Ryan Taylor

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ATTORNEYS FOR PLAINTIFFS

I, ROBERTA ZAMARRON, District Clerk, Hood County, Texas, do hereby certify that the above and foregoing is a true and correct copy of the Instruments of Cause No. C2024193 as filed In the Civil Records at the 355th District Court of Hood County, Texas

Witness my hand and seal of office, this 12TH day of AUGUST, 2024.

**ROBERTA ZAMARRON, DISTRICT CLERK
HOOD COUNTY, TEXAS**

BY

Shel A. Roach
DEPUTY



EXHIBIT A

AFFIDAVIT OF ROBERT GRANGER

STATE OF TEXAS §
 §
COUNTY OF HOOD §

BEFORE ME, the undersigned notary public, on this day personally appeared Robert Granger, a person known or proved to me, and who after being duly sworn stated the following under oath:

1. “My name is Robert Granger. I am over the age of 18 years, am of sound mind, and am capable of making this affidavit. All of the facts stated herein are within my personal knowledge and are true and correct.

2. “I am the current Precinct 112 Chair of the Hood County Republican Party. I took the oath and was duly sworn on June 17, 2024, after winning a runoff in the Republican Party primary election. After the new Chair of the Hood County Republican Party, Greg Harrell, was sworn into office, the Executive Committee approved the new Bylaws of the Hood County Republican Party. Before the time we approved those Bylaws, I had not previously seen a copy. After being sworn and approving the Bylaws, we, being the other officers of the Hood County Republican Party, were advised that we would meet again on June 26, 2024, to address candidates for nomination for the Hood County Clerk’s Office and the 355th Judicial District Clerk’s Office.

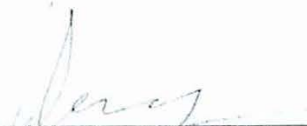
3. “The week before the June 26, 2024, meeting, I learned that Precinct Chair Melanie Graft planned to seek the nomination as candidate for District Clerk. This caused me some concern since Ms. Graft currently serves on the school board for Granbury Independent School District and is also a Precinct Chair.

4. “At the June 26, 2024, meeting, two other Precinct Chairs were not able to attend due to previously scheduled events, and another missed due to illness. In total, 13 Precinct Chairs attended the meeting, along with the County Chair Greg Harrell. Prior to the meeting, Harrell advised that he was eligible to vote on nominees to serve as the Republican Party candidate for each office just like the Precinct Chairs. Multiple people inquired regarding whether Ms. Graft could participate as a Precinct Chair and member of the Executive Committee in the voting process. Harrell advised that Ms. Graft, as a Precinct Chair and member of the Executive Committee, could in fact participate in the voting process and vote for herself.

5. “During the course of the meeting, Harrell opened the floor to nominations for the District Clerk seat. Two candidates received nominations: (a) Roberta Zamarron and (b) Melanie Graft. Harrell, as the County Chair, then asked both Zamarron and Graft if they would accept the nomination, and both affirmed that they would. Both candidates were allotted five-minute speeches. Both spoke on their own behalf, and both had two speakers who advocated their support. After the speeches, the members of the Executive Committee, including Graft, cast secret ballots. The first vote for the nominee to serve as Republican Party candidate for District Clerk ended in a 7-to-7 tie vote. Thereafter, the Harrell, as County Chair, called for a re-vote. On the re-vote, again with Graft participating, Graft prevailed 8-to-6.

6. “Both before and after the Executive Committee vote, I and other Precinct Chairs and members of the Executive Committee questioned Graft’s eligibility to serve and participate in the voting process as a Precinct Chair and member of the Executive Committee after becoming a nominee. It did not seem right that Graft could simultaneously serve in the capacity as Precinct Chair and member of the Executive Committee and a nominee to be the candidate for the very same office. Following the second vote, I and others continued to question the legality of what had transpired. On July 23, 2024, Precinct 409 Chair Brad Yarborough wrote to Chairman Harrell outlining three main legal issues apparent in how the voting process unfolded. To date, Chairman Harrell has not responded to Mr. Yarborough or any other Precinct Chairs to address the issue.

7. “I believe wholeheartedly in transparency, fairness, and integrity, not just in everyday life, but also in our elections process. Fair and honest elections are fundamental to freedom and democracy. Although I and others have expressed our concerns with the fundamental unfairness that took place, those concerns have fallen on deaf ears. Since I do not believe that the Executive Committee acted in accordance with the laws of the State of Texas or the Hood County Republican Bylaws, and Chairman Harrell has ignored the grievances, I and others believe that our only recourse is to file suit.”


Robert Granger

Sworn and subscribed to before me by the said Robert Granger on the 2nd of August, 2024.

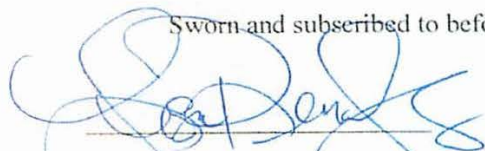

Notary Public, State of Texas



EXHIBIT B

AFFIDAVIT OF ROBERTA ZAMARRON

STATE OF TEXAS §
 §
COUNTY OF HOOD §

BEFORE ME, the undersigned notary public, on this day personally appeared Roberta Zamarron, a person known or proved to me, and who after being duly sworn stated the following under oath:

1. “My name is Roberta Zamarron. I am over the age of 18 years, am of sound mind, and am capable of making this affidavit. All of the facts stated herein are within my personal knowledge and are true and correct.

2. “I am currently serving as the 355th Judicial District Clerk. Judge Bufkin appointed me to that position following the death of Tonna Hitt Newman. I was sworn in as the 355th Judicial District Clerk on March 20, 2024. Prior to being sworn in as the District Clerk, I worked in the County Attorney’s office. I had worked in the County Attorney’s office since 2017, and served as its office manager since 2019.

3. “On June 26, 2024, the Executive Committee of the Hood County Republican Party met in executive session to decide on candidates for nomination for the Hood County Clerk’s Office and the 355th Judicial District Clerk’s Office. The Executive Committee selected me and Melanie Graft as candidates for nomination to the office of District Clerk. I am not a member of the Executive Committee. Melanie Graft, however, is a member of the Executive Committee, in addition to being an elected member of the Board of Trustees of the Granbury Independent School District and an elected Precinct Chair. As a Precinct Chair, Melanie Graft was allowed to participate and vote for those candidates nominated to the District Clerk’s office.

4. “If Melanie Graft had not been allowed to participate and vote for herself during the Executive Committee’s vote on the candidates for District Clerk, then the vote would not have resulted in a 7-to-7 tie, and there would have been no re-vote.”


Roberta Zamarron

Sworn and subscribed to before me by the said Roberta Zamarron on the 2nd of August, 2024,



Notary Public, State of Texas



EXHIBIT C

THE HOOD COUNTY REPUBLICAN PARTY BYLAWS

ARTICLE I – NAME

The name of the organization shall be the Hood County Republican Party. The headquarters of the Hood County Republican Party shall be located in Hood County, Texas.

ARTICLE II – PURPOSE

- A. The purpose of the Hood County Republican Party (hereinafter referred to as the "HCRP") shall be:
1. to act as the governing body of the HCRP and exercise those powers and fulfill those duties and responsibilities conferred upon it by the Republican Party of Texas (hereinafter referred to as "RPT") Rules, these Bylaws, Addendums, and any Standing Rules adopted herein;
 2. to establish general policy for the HCRP, subject to the direction of the biennial County, Senatorial District and State Conventions;
 3. to foster and encourage growth in the HCRP by articulating and promoting principles consistent with the RPT Platform and Legislative Priorities and by promoting and electing Republican officeholders;
 4. to provide an opportunity for full participation in the HCRP to all Hood County citizens who subscribe to the beliefs and principles advocated by the RPT subject to the RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted herein;
 5. to cooperate in carrying out programs initiated by the RPT, including but not limited to:
 - a. conducting a Republican Primary in as many election precincts within the county as practicable, but, at a minimum, having a voting location in each County Commissioner's precinct; and,
 - b. organizing a coordinated effort, preceding each general election, to publicize Republican candidates and to maximize Republican voter turnout.

B. The Constitution of the United States and the Constitution of the State of Texas, insofar as they may be applicable, are hereby adopted by reference and shall govern the conduct of all HCRP meetings. Nothing in these rules shall be deemed to waive any rights of the HCRP or the RPT.

ARTICLE III – ORGANIZATION

- A.** The HCRP is comprised of the following:
- 1.** County Executive Committee - The County Chair and the Precinct Chairs
 - 2.** Officers - The County Chair, County Vice-Chair, Treasurer and Secretary
 - 3.** Committees Chairs
 - 4.** Other Members - RPT Officials, Sergeant at Arms, Parliamentarian, and Honorary Members, as appropriate

ARTICLE IV – COUNTY EXECUTIVE COMMITTEE

The County Executive Committee (hereinafter referred to as “CEC”) conducts the official business of the HCRP as specified in the RPT Rules, these Bylaws, Addendums and any Standing Rules adopted herein.

- A.** Members – The voting members of the CEC shall be limited to the County Chair and the Precinct Chairs, who are elected at Primary election or seated through the prescribed vacancy process.
- B.** Term of Office - The term of office shall be for two (2) years, commencing on the twentieth (20th) day after the Run-Off Primary Election Day.
- C.** Qualifications – The County Chair and Precinct Chairs must affiliate with the Party in the year in which the CEC is elected and in which he or she runs for CEC, must be a qualified voter residing within the bounds of the county election precinct represented and, cannot be a holder of an elected public office or a candidate for such office at the county, state or federal level.
- D.** Vacancies - Any vacancy in the office of County Chair or Precinct Chair shall be filled by the CEC. Such vacancies shall be filled in accordance with the RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted herein as follows:
- 1.** County Chair - A majority of the total membership of the CEC must participate in filling a vacancy in the position of County Chair and the person selected must

receive a majority of the votes cast by those members participating in a properly noticed election, as provided by the RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted herein.

2. Precinct Chair - One-fourth (1/4) of the total seated membership of the CEC shall constitute a quorum for filling a vacancy for Precinct Chair and the person selected must receive a majority of the votes cast of those members participating in a properly noticed election, as provided by the RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted herein.

E. Duties – The CEC shall exercise those powers conferred upon it by the RPT, these Bylaws, Addendums, and any Standing Rules adopted herein, and perform all duties necessary to promote the best interest of the HCRP and the RPT.

1. County Chair – The County Chair shall be the HCRP and CEC’s official Spokesperson and Presiding Officer; and performs the following responsibilities:
 - a. Duties required by these Bylaws, Addendums, any Standing Rules and the RPT Rules
 - b. Shall be ex officio member of all Standing and Ad Hoc Committees
 - c. May be a member of the Texas Republican County Chair’s Association (TRCCA) and any assessments or dues levied by the TRCCA shall be paid by the HCRP
 - d. Recruit Republicans to fill key positions
 - e. Help promote and grow the HCRP
 - f. Attend all meetings of the CEC
 - g. Conduct Precinct and County Conventions in even numbered years
 - h. Keep election records and take all steps to ensure election integrity
 - i. Authorize disbursing of funds up to \$500.00 for time-sensitive needs, provided however, expenses exceeding \$100.00 shall require prior concurrence via email of one of the following: County Vice-Chair, Treasurer, Chair of Finance/Budget Committee; and the entire CEC shall be notified promptly of such expenditures
 - j. The County Chair shall not officially endorse a specific candidate in any primary election involving two or more Republican candidates running for the same office.
 - k. Any such other duties applicable to the office as prescribed by the RPT, RPT Rules, the HCRP, these Bylaws, Addendums, and any Standing Rules adopted herein
2. Precinct Chairs – Precinct Chairs have the following responsibilities:
 - a. Maximize the Republican votes in their precincts
 - b. Help promote and grow the HCRP

- c. Help recruit, promote and elect Republican candidates
- d. Attend all meetings of the CEC
- e. Participate in the HCRP Precinct and County Conventions
- f. Serve as and recruit volunteers in the HCRP's activities and events
- g. Fulfill the purposes of the HCRP as stated in Article II of these Bylaws, Addendums, any Standing Rules adopted herein and RPT Rules
- h. Serve as an Officer, Committee Chair, or Committee Member as needed
- i. Assist the County Chair and County Vice-Chair as needed
- j. Any such other duties applicable to the office as prescribed by the RPT Rules, the HCRP, the County Chair, the CEC, these Bylaws, Addendums, and any Standing Rules adopted herein

F. Removal from Office - A County Chair or Precinct Chair who has failed to perform duties outlined by the RPT, the RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted herein or who has failed to attend four or more regular consecutive meetings of the CEC may be removed for abandonment of office as provided by the RPT rules, these Bylaws, Addendums, and any Standing Rules adopted herein.

ARTICLE V – OFFICERS

A. Officers of the CEC shall be the County Chair, County Vice-Chair, Treasurer, and Secretary. The County Vice-Chair and Treasurer shall be appointed by the County Chair at the Organizational Meeting, and in no case shall the Office of County Vice-Chair or Treasurer be vacant more than (90) days. The County Secretary shall be appointed by the County Chair and confirmed by the CEC at the first Organizational Meeting. Each officer shall perform those duties assigned to them by the RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted herein.

B. The term of office for officers shall be concurrent with that of the CEC, except in the event of a vacancy in the office of County Chair, at which time the County Vice-Chair shall serve only until the election of a new County Chair.

C. It shall be the duty of each CEC Officer to attend all CEC meetings and to fulfill the purposes of the HCRP as stated in the RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted herein. Duties of Officers shall be those prescribed by the parliamentary authority adopted by the CEC, the RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted as follows:

- 3. County Chair – See ARTICLE V, Paragraph F, Item 1
- 4. County Vice-Chair – The County Vice-Chair has the following responsibilities:

- a. Shall assist the County Chair as requested. The County Vice-Chair may not perform any statutory duties but may assist in other functions of the County Chair, including appointment to committees.
- b. In the absence of County Chair, the County Vice-Chair presides over the meetings
- c. In the event the office of the County Chair becomes vacant, the County Vice-Chair shall serve as Acting County Chair until the County Chair resumes his/her duties or until the election of a new County Chair. When serving as Acting Chair, the County Vice-Chair shall have all the authority and powers of the County Chair
- d. Serve as Committee Chair or Committee Member as needed
- e. Coordinate with the Hood County Elections Administrator on behalf of the HCRP including, but not limited to, participating in the selection of election clerks, election judges, poll workers and the scheduling of workers for elections
- f. Any such other duties applicable to the office as prescribed by the RPT, the County Chair, the HCRP, these Bylaws, Addendums and any Standing Rules adopted herein

5. **Secretary - The Secretary has the following responsibilities:**

- a. Maintain records of the minutes of all CEC meetings
- b. Keep on file all committee reports
- c. Keep permanent record of the CEC minutes and HCRP Bylaws, Addendums and any Standing Rules adopted, which shall be brought to each CEC meeting
- d. Carry out the usual duties of that office, keeping an up-to-date roll of the CEC members, distributing such roll (including contact information) to the CEC, and ensuring that all CEC members receive timely notices of meetings
- e. Make the Secretary's books and records available for viewing to any CEC member upon request at such time and place as may be convenient to the Treasurer. At no time shall the Treasurer make copies or images or allow any CEC member to make copies or images unless the records are customarily distributed to the CEC
- f. Maintain a current list of the names, and mailing addresses of the Precinct Chairs. The list shall be updated promptly with any changes
- g. Transfer records of the HCRP and the CEC to the new Secretary or County Chair upon leaving office
- h. In the event of a vacancy in the office of County Chair, call a meeting of the CEC for the purpose of electing a new County Chair
- i. In the event of a simultaneous vacancy in the offices of County Chair and County Vice-Chair, preside over the election of a new County Chair, relinquishing presiding officer duties immediately upon election of the new County Chair

- j. Receive applications for a place on the Primary Ballot in accordance with the RPT, the RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted herein.
 - k. Any such other duties applicable to the office as prescribed by the County Chair, the RPT, the RPT Rules, the HCRP, these Bylaws, Addendums, and any Standing Rules adopted herein
6. Treasurer – The Treasurer has the following responsibilities:
- a. Shall be custodian of the funds deposited in the HCRP’s accounts
 - b. The HCRP’s accounts shall have signature authority of the Treasurer, the County Vice-Chair and the Chair of the Finance and Budget Committee with two signatures required to write checks
 - c. The General Purposes / Operating Account shall be used for the HCRP’s routine and normal expenses for conducting HCRP’s business
 - d. The Campaign Account is used strictly for the purpose of conducting Primary elections and candidate filing fees in conjunction with the Texas Secretary of State. The Primary Account shall not be used for CEC’s routine business.
 - e. Shall perform applicable duties required by federal and state statutes including listing of names, address, occupation, amount and the date of contributions and expenditures
 - f. Prepare a current financial report for presentation to the CEC at each regular meeting; and if requested, at any Special called meeting or committee meetings.
 - g. Pay all bills and disburse funds by check on the order of the County Chair as approved by the CEC
 - h. Make the records available for viewing to all voting members of the CEC upon request at such time and place as may be convenient to the Treasurer. At no time shall the Treasurer make copies or images or allow a member to make copies or images unless the records are customarily distributed to the CEC.
 - i. Serve as a member of the Finance and Budget Committee
 - j. Support the Finance and Budget Committee to generate and present the annual budget
 - k. Commission an independent audit or financial review of the HCRP finances at the request of either the County Chair or the CEC; however, an independent audit or independent financial review of the HCRP finances must be commissioned not less than once per calendar year.
 - l. Complete and submit financial reports, as required, to the appropriate entities such as the RPT or governmental agencies
 - m. Any such other duties applicable to the office as directed by the County Chair, the CEC, RPT Rules, the HCRP, these Bylaws, Addendums, and any Standing Rules adopted herein

ARTICLE VI – COMMITTEES

A. Members - The Committee Chairs are non-voting ex officio members of the CEC, unless they also serve as Precinct Chair. The County Chair shall appoint the Chair of all Standing and Ad Hoc Committees deemed necessary to carry out the policies of the HCRP and CEC. Committee Chairs may serve for such time as the County Chair may hold office, except as provided in Section C and Section F of this Article.

The Committee Chair may appoint members as he/she may choose. Members are not required to be precinct chairs.

Each Standing Committee Chair must provide a list of each committee member, including name, address, phone number, and email address to the secretary.

B. Reports - The Committee Chairs are expected to present their progress status at the CEC Regular meetings; and if requested, at Special meetings. The Committee Chair shall obtain CEC approval for implementing recommended proposals and related expenses.

C. Qualification – All committee members shall be registered voters in Hood County and voted in the last Republican Primary election

D. Member Removal – A committee chair or committee member may be removed from a committee upon request of the County Chair or the Committee Chair.

E. Procedures – Each committee is authorized to develop procedures for conducting the business within that committee's jurisdiction, subject to review and amendment by the CEC pursuant to the RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted herein.

F. Standing Committees – All Standing Committees shall be listed in the Standing Committee Addendum attached herein.

G. Ad Hoc Committees – Ad Hoc Committees may be established by the County Chair or by vote of the CEC as necessary and shall have a limited term and scope. A majority vote of the CEC members present at such meeting is required for the CEC to establish an Ad Hoc Committee.

H. Quorum for Committee Meetings – A quorum is a majority of the committee membership.

ARTICLE VII – OTHER MEMBERS

The Parliamentarian, Sergeant-At-Arms, and Honorary Members, including RPT Officials present at any CEC meetings, are non-voting ex officio members.

- A. Parliamentarian – A Parliamentarian may be appointed by the County Chair. The duties of this Office are to advise the County Chair on matters of parliamentary procedure and compliance with RPT Rules, these Bylaws, Addendums, and any Standing Rules herein adopted.
- B. Sergeant-At-Arms – A Sergeant-At-Arms may be appointed by the County Chair. The duties of this office are to maintain proper order and decorum at any meetings and events of the HCRP including CEC meetings.
- C. Honorary Members – May be appointed by the County Chair or by vote of the CEC

ARTICLE VIII – MEETINGS

The CEC shall meet upon call of the County Chair, at such times as provided by the RPT Rules, these Bylaws and any Standing Rules adopted herein. All Meetings of the CEC shall be subject to the applicable provisions of RPT Rules.

- A. Statutory Meetings - Statutory Meetings shall be duly called by the County Chair, or in the County Chair's absence by the County Vice-Chair, for the purpose so designated by law or by RPT Rules, these Bylaws, Addendums, and any Standing Rules adopted here; and no other business may be transacted at such statutory meetings.
- B. Regular Meetings - The CEC shall meet no less frequently than quarterly for the conduct of business necessary to fulfill its objectives and purposes. In even-numbered years, the fourth quarterly meeting shall be held after the November general election.
- C. Organizational Meetings - One or more organizational meetings of the newly elected CEC shall be held within (45) days following the commencement of the term of office for County Chair and Precinct Chairs for the purpose of organizing the CEC, adopting Bylaws, Addendums and any Standing Rules, and consideration of the County Chair's appointments for Officers and other members.
- D. Special Meetings - Special meetings of the CEC may be called by the County Chair; or shall be called by the County Chair upon petition signed by at least nine (9) members of the CEC, representing no fewer than fifty percent (50%) of the precincts, delivered to the Secretary (or to the County Headquarters if the Secretary is not available), at least three (3) days prior to the date specified for the meeting. Any notice of a special meeting must contain the purpose for which the meeting is called.

E. Notices -

1. **Organizational, Regular, Statutory and Non-Statutory Meetings** - A written call containing notice of the Organizational, Statutory meeting or Non-Statutory meeting may be given by electronic mail, electronic messaging, telephone, personally delivered to available CEC members, or mailed no later than seven (7) days prior to the meeting, to each CEC member's email, phone number, or address appearing on the Secretary's record. The seven-day notice may be waived in the event of a stated emergency as declared by the Parliamentarian or the Chair of the Rules, Bylaws and Resolutions Committee, in which case forty-eight (48) hours' notice shall be given by electronic mail, electronic messaging, telephone, or personally delivered to available CEC members.
2. **Special Meetings** - A written call containing notice of the Special Meeting may be given by electronic mail, electronic messaging, telephone, or personally delivered to available CEC members, no later than three (3) days prior to the meeting.

F. Proxies – The use of Proxies or Proxy voting is prohibited.

G. Quorum -

1. **Non-Statutory and Special Meetings.** A quorum for all Non-Statutory and Special Meetings of the CEC shall be twenty five percent (25%) of the voting members of the CEC, excluding vacancies.
2. **Statutory Meetings.** A quorum for all Statutory Meetings shall be the majority of the voting members of the CEC, excluding vacancies.

H. **Voting** - Each member of the CEC, including the County Chair, shall have the right to cast his/her individual vote. The method of voting shall be by voice, show of hands, or ballot, as determined by the County Chair, unless otherwise ordered by a majority vote of the CEC, provided, however, that upon demand of a member present, in person, a roll-call vote shall be taken. The "ayes" and "nays" of any roll-call vote shall be entered into the minutes of such a meeting.

ARTICLE IX – FINANCE AND EXPENDITURES

A. The Party shall hold funds in two accounts. One account shall be designated for General Purposes / Operating Expenses and the other account shall be designated for Campaign expenses. Two (2) of the three (3) signatures will be required for all expenditures.

B. The County Vice-Chair, Treasurer, or Chair of the Finance and Budget Committee shall be authorized to sign checks for routine expenditures which are \$1000.00 or less without prior

CEC approval. Any non-budgeted expenditure over the amount of \$250.00 shall require ratification or authorization of the CEC and must be recorded in the minutes of the meeting in which such action was taken.

C. In the event of a non-budgeted and time-sensitive expense, the County Chair may authorize the disbursement of funds up to \$500.00; provided, however, expenses exceeding \$100.00 shall require prior concurrence via email of one of the following: County Vice Chair, Treasurer, Committee Chair of Finance and Budget. All voting members of the CEC shall be notified promptly of the details of such expenditures.

D. Any expenditure falling within a budget previously approved by the CEC for events, (for example, the Lincoln Reagan Dinner, Precinct and County Conventions, etc.) shall not be subject to another CEC approval process.

E. Neither the County Chair nor any other office, employee, or representative of the CEC shall borrow funds on behalf of the HCRP or the CEC or commit the HCRP or the CEC to repay any loan or note.

ARTICLE X – PARLIAMENTARY AUTHORITY

The rules contained in the most current edition of *Robert's Rules of Order* shall govern the CEC in all cases in which they are applicable and when they are not inconsistent with the RPT Rules, these Bylaws, Addendums, Standing Rules herein adopted, or any state or federal statute.

ARTICLE XI – PUBLIC STATEMENTS

No individual or organization shall be authorized to make public statements on policy or specific candidate recommendations in any manner purporting to represent the Hood County Republican Party or the CEC. This prohibition includes public statements to the press or media, social media posts, websites, texts, paid advertisements (e.g. newspaper, television or radio), signage, including signage adjacent to Rights-of-way, or by printed material delivered by mail or by hand. Upon a majority vote at a CEC meeting, such individual or organization violating this Article shall be formally censured and be required to immediately cease any such activity. Further, any such individual or the leadership or any such organization shall be denied formal participation in the Hood County Republican Party for a period of not less than four (4) years. This denial shall include any formal participation as a Delegate to county conventions or consideration as a Delegate to a Texas Republican Party Convention. The elected Hood County Republican Chair is the official spokesperson for the HCRP and is authorized to make public statements on behalf of the Hood County Republican Party and the CEC.

ARTICLE XII - AMENDMENT OF BYLAWS

These Bylaws may be amended by a two-thirds (2/3) vote of the members of the CEC present and voting at a properly called and noticed Regular, Organizational or Special meeting of the CEC.

ARTICLE XIII – EFFECTIVE DATE

These Bylaws shall remain in force until otherwise revised or amended, subject to provisions in Article XII and are effective as of June 17, 2024 as approved by the Hood County Republican Party's Executive Committee.

ARTICLE XIV - SEVERABILITY

If any provision of these Bylaws violates or is inconsistent with RPT Rules or statute, that provision shall be deemed to be of no effect and the remaining provisions of these Bylaws shall not be affected thereby.

EXHIBIT D

July 23, 2024

Chairman Harrell,

I'm writing to inform you that it appears clear to me and others that the vote taken on June 26 to select Melanie Graft as the Republican candidate for district clerk should be reversed immediately. I don't believe this was done in bad faith. However, you were asked by multiple people before the meeting if she could simultaneously act as a member of the executive committee while seeking the nomination for district clerk. You affirmed that she could, and you affirmed that she could vote for herself. After careful review, I believe this was wrong for the reasons listed below:

I. It violated Election Code 161.005

According to this statute, for a person to be eligible to serve as a precinct chair, they must not be a candidate for nomination to an elected county government position. Thus, at the moment Ms. Graft put herself forward as a candidate for district clerk, she was no longer eligible to serve as precinct chair. As such, she was no longer eligible to vote for herself. Had she not been able to vote for herself, she would have lost the initial vote seven to six.

II. It violated Hood County Republican Party bylaws

Under Article IV, Section C, a precinct chair "cannot be a holder of an elected public office or a candidate for such office at the county, state or federal level." This language is slightly broader than the Election Code, in that it made Ms. Graft ineligible to serve as a precinct chair in the first place, due to her being a holder of an elected public office (Granbury ISD school board). In addition, it disqualified her from serving as a precinct chair and voting for herself after she became a candidate for a county office.

III. It violated the self-appointment doctrine

Case law and attorney general opinions in Texas have long maintained a prohibition against self-appointment. This dates back as far as a Supreme Court case in 1928. "It is because of the obvious incompatibility of being both a member of a body making the appointment and an appointee of that body that the courts have with great unanimity throughout the country declared that all officers who have the appointing power are disqualified for appointment to the offices to which they may appoint." *Ehlinger v. Clark*, 8 S.W.2d 666, 674 (Tex. 1928).

Under the self-appointment prohibition, the executive committee is barred from appointing one of its own to a position, even if the member in question doesn't vote. Tex. Att'y Gen. Op. No. GA-0377 (2005) at 5-6. Other attorney general opinions have stated the same thing over the years. *See* Tex. Att'y Gen. Op. No. JC-0455A (2002) and Tex. Att'y Gen. Op. No. KP-0119 (2016).

While I don't believe there is a case or AG opinion with our exact set of facts, I believe precedent is there for courts to take a dim view of the executive committee's self-appointment of one of its own members.

Please review the three issues listed above and consider doing the right thing immediately to remedy this injustice, before this matter goes any further. Thanks for your attention to my concerns.

Automated Certificate of eService

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Whitney Alexander on behalf of Ryan Taylor
Bar No. 24103709
whitney@coanlaw.com
Envelope ID: 90795481
Filing Code Description: Amended Filing
Filing Description: Plaintiffs' First Amended Petition
Status as of 8/12/2024 4:08 PM CST

Associated Case Party: GregHarrell

Name	BarNumber	Email	TimestampSubmitted	Status
Eric Opiela		eopiela@ericopiela.com	8/12/2024 2:56:17 PM	SENT
Eric Opiela		eopiela@ericopiela.com	8/12/2024 2:56:17 PM	SENT

Associated Case Party: Greg Harrell

Name	BarNumber	Email	TimestampSubmitted	Status
Eric Opiela		eopiela@ericopiela.com	8/12/2024 2:56:17 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Ryan Taylor		taylor@coanlaw.com	8/12/2024 2:56:17 PM	SENT
Hood County Constable 1 YOLANDA FIGUERO		YFIGUEROA@CO.HOOD.TX.US	8/12/2024 2:56:17 PM	SENT
Hood County Constable 1 CHAD DAVIS		cwdavis@co.hood.tx.us	8/12/2024 2:56:17 PM	SENT

Associated Case Party: Roberta Zamarron

Name	BarNumber	Email	TimestampSubmitted	Status
RYAN TAYLOR		TAYLOR@COANLAW.COM	8/12/2024 2:56:17 PM	SENT

Associated Case Party: Robert Granger

Name	BarNumber	Email	TimestampSubmitted	Status
RYAN TAYLOR		TAYLOR@COANLAW.COM	8/12/2024 2:56:17 PM	SENT

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Whitney Alexander on behalf of Ryan Taylor
Bar No. 24103709
whitney@coanlaw.com
Envelope ID: 90795481
Filing Code Description: Amended Filing
Filing Description: Plaintiffs' First Amended Petition
Status as of 8/12/2024 4:08 PM CST

Associated Case Party: Brad Yarborough

Name	BarNumber	Email	TimestampSubmitted	Status
RYAN TAYLOR		TAYLOR@COANLAW.COM	8/12/2024 2:56:17 PM	SENT

Associated Case Party: Mark Jackson

Name	BarNumber	Email	TimestampSubmitted	Status
RYAN TAYLOR		TAYLOR@COANLAW.COM	8/12/2024 2:56:17 PM	SENT