

TO: JENNIFER BLACK, CHAIRMAN, AND THE GREENVILLE COUNTY REPUBLICAN PARTY EXECUTIVE COMMITTEE

FROM: 2021 REORGANIZATION AND CONVENTION REVIEW SPECIAL COMMITTEE

SUBJECT: FINAL REPORT OF THIS SPECIAL COMMITTEE

DATE: JULY 3, 2021

SPECIAL COMMITTEE FORMATION

Within weeks of her election as Party Chair, Chairman Black formed a Special Committee of the Greenville County Republican Party (hereinafter "GCRP") for the specific and limited purpose of reviewing the 2021 Greenville County Republican Party Reorganization and County Convention with regard to how the reorganization was conducted in accordance with the governing law and the applicable Republican Party Rules. Rule 6C of the GCRP authorizes the County Party Chairman to appoint special committees, including a special committee chairman. In accordance with that Rule, on May 2, 2021, the following persons were notified of their selection to serve on this Special Committee:

Stephen Brown, Chairman

Evert Headley

Julie Hershey

Jeff Holmes

Stacey Owens

Tim Schuyler

Jennifer Black, ex-officio member, as GCRP Chairman pursuant to Rule 6A of the GCRP Rules.

The Special Committee was specifically directed to submit a report of its findings on credentialed delegates, voting issues, and the vote totals. The Special Committee was authorized to explore these matters at the level it saw fit and to provide its report prior to the June 7, 2021, regularly scheduled meeting of the GCRP Executive Committee. For reasons explained below, the Special Committee determined that it was unable to complete its task and provide a full report prior to June 7, 2021, so it advised Chairman Black that it would complete its work and issue its report prior to the next regularly scheduled meeting of the GCRP Executive Committee. At that time, it was anticipated by the Special Committee that the next regularly scheduled meeting of the GCRP Executive Committee would be held on the first Monday in August, consistent with the long-established meeting schedule for the GCRP Executive Committee. However, the newly elected GCRP Executive Committee, at its first regularly scheduled meeting, held June 7, 2021, changed its schedule going forward such that its meetings will now be held monthly. Accordingly, the Special Committee was directed to complete its work and report its findings prior to the July 2021 meeting, currently scheduled for July 12, 2021. In addition to submitting this written report, the Special Committee anticipates taking part in a Special Meeting of the GCRP Executive Committee, called by the Chairman, on July 6, 2021, for the express and sole purpose of reporting the findings set forth in this Final Report, discussing the work performed by the Special Committee, and, to the best of its ability, answering all questions that may be raised by GCRP Executive Committee members relating to

the investigation performed by the Special Committee and the application of the governing law and the relevant Republican Party Rules to the facts as reported by the Special Committee.

REASONS WHY THIS SPECIAL COMMITTEE WAS FORMED

It is well known to anyone with a passing knowledge of the GCRP that a hotly contested election for County Party GOP offices took place at the GCRP County Convention, held virtually, on April 13, 2021. A highly coordinated effort was made by a group calling itself mySCGOP.com, prior to and during the 2021 Republican Party reorganization process, to fill GCRP convention delegate slots, and all other GOP offices it could, with like-minded persons supporting the stated objectives of mySCGOP.com. That group even presented a slate of candidates for election for each of the three officer positions to be elected at the GCRP Convention. The candidates for those three positions, and the results from the electronic voting conducted by the convention delegates at the virtual GCRP Convention on April 13, 2021, were reported as follows:

<u>Chairman</u> - <u>Votes</u>	<u>Vice Chairman</u> - <u>Votes</u>	<u>Executive Committeeman</u> - <u>Votes</u>
Jennifer Black 680	Stacy Shea 659	Randy Page 686
Jeff Davis 594	Walter Horin 614	Pressley Stutts 596
Abstain 12	Abstain 13	Abstain 4

As routinely occurs at the biennial GCRP reorganization meetings, the number of people attending any particular precinct meeting and desiring to attend the GCRP Convention as a delegate are generally less than the total number of delegates allotted to that particular precinct at the GCRP Convention. Of course, there are the occasional instances where all convention delegate slots are filled at the initial precinct reorganization meeting, but such instances are rare. They are the exception, not the rule. In this 2021 reorganization cycle, many people left their precinct meeting on the evening of March 22, 2021, knowing that there were a finite number of delegate slots to the county convention still available from that particular precinct. Many of those people thought that a person could not become a delegate to the county convention and fill one of those remaining county convention delegate positions from a particular precinct until/unless they attended the April 6, 2021, make-up meeting and were “elected” as a delegate to the county convention. As a result, when potential county delegates they recruited attended the make-up meeting on April 6th and learned in many cases that there were no additional delegate positions available from a particular precinct, they cried “foul” because they believed those people had been cheated out of an opportunity to become a GCRP Convention delegate. That fact pattern led to a significant amount of mistrust concerning how the Republican Party’s reorganization process was being conducted. The tensions mounted when registered delegates to the county convention received a “delegate list” on April 9, 2021, some four days prior to the convention scheduled for April 13, 2021, that provided no email addresses for hundreds of delegates. There were more than 155 delegates on the list for whom no contact information at all

was provided, constituting more than eleven percent of the total delegates. The percentage of named delegates with no email address provided was approximately fifteen percent. There was no home address nor precinct identification for any of the delegates, and the list was not in alphabetical order. The “delegate list” served little purpose for a candidate intending to use the list as a way to reach potential voters for a county convention being held in four days.

Finally, some people were permitted to electronically cast ballots after the originally posted 9 p.m. convention ending time. The last delegate permitted to cast a ballot successfully submitted her ballot at 11:14 p.m. on April 13, 2021. All of these facts, combined with the report that all of the mySCGOP.com candidates running for Chairman, Vice Chairman and Executive Committeeman were defeated at the GCRP convention, despite the fact that at the same time nearly the entire slate of mySCGOP.com state convention candidates obtained the largest number of votes, gathering around 75 of the 79 state delegate seats to the South Carolina Republican Party Convention to be held in May, led some people to question the legitimacy of the officer elections and the integrity of the vote. These concerns were of course amplified by the allegations of election fraud we all witnessed in other states around the nation, with little to no corrective action taken, in the 2020 general elections held last fall. Together, the ingredients for an explosion were present when a number of people felt they had been cheated by the manner in which the GCRP 2021 Reorganization, and the Convention, were conducted. The understandable resulting unrest and discontent led to the formation of this Special Committee to investigate all of these matters, and other related issues, and report our findings to the GCRP Executive Committee. The Special Committee has taken this duty, and this opportunity, very seriously.

SPECIAL COMMITTEE ACTIONS

The Special Committee recognized that each step of our review process had to be, and hopefully also perceived to be, even-handed, fair-minded, and consistent with all applicable state laws and Republican Party Rules. We knew our task needed to be completed thoroughly, expeditiously, and without any appearance of impropriety or partiality. The Special Committee promptly sent emails to each of the six officer candidates who sought election at the GCRP Convention, soliciting their input as to areas of concerns, or complaints, to be investigated. Jeff Davis sent several emails raising some issues to be reviewed, one of which referenced the shortcomings of the “delegate list” already mentioned. Chairman Black forwarded to the Special Committee any emails she had received concerning issues within its purview. The Special Committee itself saw and followed-up on other potential leads. The Special Committee requested, received and selectively reviewed the completed Form 1s, as the investigation proceeded. The Form 1 is the Republican Party document party members complete, and ink sign, as they evidence their involvement in the GCRP and file to become delegates to the GCRP Convention. The initial review of the completed Form 1s, from various precincts across Greenville County, quickly revealed that hundreds of the Form 1s had been redacted (information “blacked out” so that it could not be read) in part of the block where financial information was to be recorded in the bottom right-hand corner of the page. This initial review of the completed Form 1s also quickly revealed that hundreds of the Form 1s were submitted without email addresses or telephone numbers on the designated lines on the form, but did contain certain contact information, email addresses and telephone numbers in many instances,

written on the back, otherwise “blank” side, of the Form 1. These facts concerned the Special Committee. Actually, the redaction of information from hundreds of otherwise standard Republican Party forms used for the statutorily required purpose of biennial Party reorganization, shocked us. Members of the Special Committee have been unable to come up with a legitimate reason why a responsible Party official, acting in good faith, would intentionally redact information from these forms. The various possible nefarious reasons for such an action are apparent. The best case, assuming a well-intentioned Party official simply used bad judgment in authorizing the redactions, obviously results in someone reviewing the redacted forms coming to the conclusion that it was part of an effort to hide something, but not a very sophisticated effort, since the redaction itself leads to additional questions. In any event, learning of these issues with the Form 1s in late May caused the Special Committee to conclude that additional investigation was required and that we could not possibly complete our assigned task by the original June 7, 2021 deadline.

The Special Committee reached out to a number of delegates whose contact information was not included on the delegate list, but was available to the Special Committee on the back of the Form 1s. Some of those contacts were made randomly. Others were made deliberately because of specific complaints or unusual facts brought to the attention of the Special Committee. Rigorous efforts were made by members of the Special Committee to ascertain the bona fides of persons who took part as delegates at the GCRP Convention, particularly those delegates whose contact information was intentionally withheld from the delegate list.

The Special Committee met with the immediate past GCRP Chairman, Nate Leupp, and specifically reviewed with him procedures and data related to the “Election Runner” electronic voting system utilized at the GCRP virtual convention. Members of the Special Committee also asked him many other questions, unrelated to the “Election Runner” program, related to the various other issues the Special Committee was investigating. To his credit, Mr. Leupp was direct and responsive, even if the members of the Special Committee did not agree with the conclusions he drew from the admitted facts. For example, Mr. Leupp admitted that he directed the redactions on the Form 1s. While he never told us what words or numbers were redacted, the explanation for the redactions on hundreds of forms was that the word or words redacted could have been misleading to or misinterpreted by a reader. Mr. Leupp also admitted that hundreds of Form 1s were intentionally completed without information on the designated lines on the Form 1, but included instead on the back of the Form 1. The explanation given for such actions was that the information written on the back of the Form 1 was not going to be disclosed to other delegates because the person completing the form did not want his/her contact information shared with other delegates. The investigation by the Special Committee revealed that in some instances, an email address and/or a telephone number written on the back of a Form 1 was in fact included on the delegate list forwarded to GCRP Convention delegates on April 9, 2021. In other words, some of the people who wrote their contact information on the back of the Form 1 were not the delegates whose contact information was withheld from the rest of us. When directly confronted with this point, Mr. Leupp acknowledged that he was aware of that fact and that mistakes were made. The point was that an even larger number of delegates’ contact information was intended to be withheld. Simple “errors” made by volunteers, acting in good faith, resulted in some delegate contact information being revealed on the delegate list when the intention was to withhold that information, just as it had been withheld for hundreds of other delegates to the GCRP Convention.

A FEW WORDS ON GREENVILLE COUNTY REPUBLICAN PARTY VOLUNTEERS

The GCRP is comprised of volunteers. That includes the current Chairman, the immediate past Chairman, all the members of this Special Committee, and all of the GCRP officers and volunteers who worked so hard to conduct the 2021 Reorganization and the GCRP Convention. We/they are all human. Sometimes mistakes are made. This Special Committee took great pains to “cut some slack” for mistakes made by any of our volunteers. Generally, they do superior work, motivated by their own sense of patriotic duty. The Special Committee clearly delineates “good-faith errors” from intentional actions. For example, collecting and compiling all of the Form 1s and entering the information from those forms into the GCRP data base, required to complete a “certified list of delegates and alternates”, is a lot of work and requires many man hours (more accurately woman hours in many cases). There are important deadlines that must be met, as later discussed in this report. Timely completing this task requires a lot of work to be done over a limited amount of time, usually by a handful of volunteers, making the effort rather stressful. We should all thank and appreciate those volunteers. This Special Committee does. In contrast, intentionally not providing the necessary and required contact information was not an error, but was a deliberate decision made by those in authority over the process. To be rude, unkind or threatening in any fashion to the volunteers following instructions in good-faith is totally unacceptable; even when the basis for the frustration may be understandable. A little grace can go a long way.

GOVERNING STATE LAW AND REPUBLICAN PARTY RULES

1. The laws of the State of South Carolina require that certified political parties complete a reorganization process every two years consistent with the applicable statutes and the governing Party Rules. The South Carolina Republican Party is now, and has been for many years, a certified political party. The Rules of the South Carolina Republican Party (hereinafter “SCGOP Rules”) govern the process for Republican Party reorganization across the state of South Carolina, including Greenville County.

2. Rule 4 of the SCGOP Rules, entitled “Precinct Organization”, generally governs the process by which the Republican Party across the State of South Carolina organizes, or reorganizes, its precincts. Specifically, Rule 4(c) sets forth the precinct reorganization proceedings and provides the guidance on how Republican Party precincts determine which of its members will be “elected” as delegates and alternates to the County Convention.

3. SCGOP Rule 4(c)(5) provides very specific guidance as to how delegates and alternates to the county convention “shall be elected from the members of the precinct” at the reorganization meeting. That same Rule is not very clear as to how delegates and alternates are to be elected AFTER the precinct reorganization meeting is held. It does however clearly state that “No delegate or alternate shall be elected by the precinct less than five (5) days before the County Convention.”

4. SCGOP Rule 4(c)(8) directs the county chairman to set a date “no later than five days prior to the county convention for precincts to meet, referred to as a make-up meeting, that have

failed to organize or re-organize or that need to conduct further business, including the ability of precincts to fulfill their delegate allotment to the county convention.”

5. SCGOP Rule 4(c)(5) requires the county chairman to submit a “certified list of precinct members, precinct officers and delegates and alternates” to the State Chairman no later than seven (7) days following the initial meeting, and no later than three (3) days after a make-up meeting.

6. SCGOP Rule 4(c)(5) specifically requires the following: “The county chairman shall make the certified list of delegates and alternates to the county convention available to any delegate, alternate or precinct officer no later than three (3) days after a make-up meeting. Such certified lists shall contain all contact information known to the county party.”

FINDINGS OF FACT BY THE SPECIAL COMMITTEE

1. The Greenville County Republican Party precinct reorganization meetings were held on Monday, March 22, 2021, for this most recent biennial reorganization cycle.

2. Across Greenville County, 877 delegates and 20 alternates to the GCRP Convention were elected from the various precincts at the reorganization meetings held on March 22, 2021. Those delegates and alternates each paid a fee of \$20.00, as required by the GCRP, to be credentialed as either a delegate or an alternate to the county convention.

3. The Greenville County Republican Party “make-up meeting” was held on Tuesday, April 6, 2021.

4. 173 delegates and 44 alternates to the GCRP Convention were elected from the various precincts at the make-up meeting on April 6, 2021. Those delegates and alternates each paid a fee of \$20.00, as required by the GCRP, to be credentialed as either a delegate or an alternate to the county convention.

5. 337 delegates and 48 alternates to the GCRP Convention were signed up by “agents of the Party” between the time the precinct reorganization meetings were held on March 22, 2021, and the make-up meeting was held on April 6, 2021. Of these 385 delegates and alternates signed up in this interim period, only 25 of them paid \$20.00, as required by the GCRP, to be credentialed as either a delegate or an alternate to the county convention. Stated conversely, 360 people who were signed up to be delegates or alternates to the GCRP Convention in the time period between the precinct reorganization meetings held on March 22, 2021, and the make-up meeting held on April 6, 2021, did not pay the required county convention registration fee of \$20.00.

6. As of April 13, 2021, when the GCRP Convention was held, and the new GCRP administration was elected, the GCRP treasury was short \$7,200.00 as a result of 360 people who were signed up as delegates or alternates without paying the required \$20.00 GCRP Convention registration fee.

7. On or about June 11, 2021, approximately two months after the GCRP Convention had been held and elections conducted, the GCRP received an SCGOP State Operating Account check in the sum of \$7,200.00 made payable to the Greenville County Republican Party.

8. “Agents of the Party” signing up Greenville County voters to be delegates or alternates to the GCRP Convention in the time window between the precinct reorganization meetings on March 22, 2021, and the make-up meeting on April 6, 2021 (hereinafter the “interim period”), included several volunteers and at least one paid Field Director of the SCGOP.

9. These “agents of the Party” told the Greenville County voters signed up as delegates or alternates during this interim period that they did not have to pay a convention registration fee.

10. The “agents of the Party” signing up Greenville County voters during this interim period were told that the people they signed up did not have to pay the \$20.00 convention registration fee because an anonymous donor either had made or was going to make a contribution to the GCRP to cover the convention registration fees.

11. No donation, anonymous or otherwise, was ever made to the GCRP to cover the uncollected convention registration fees.

12. Upon inquiry, the Special Committee was told that the anonymous contribution had to be made to the SCGOP, instead of the GCRP, because the GCRP periodically files Ethics Statements which would have made such an anonymous contribution to the GCRP impossible.

13. Upon inquiry, the Special Committee was told that there were multiple donors to the SCGOP who made contributions to cover the \$7,200.00 paid to the GCRP by the SCGOP in June of 2021. We were also advised that the largest chunk of the money was donated to the SCGOP around the third week of March, 2021. The Special Committee was given no details as to exactly how many anonymous donors gave funds to the SCGOP, how much each such donor contributed, or when such donations were actually received by the SCGOP.

14. No explanation was given to the Special Committee as to why the SCGOP did not timely pay money to cover convention registration fees to the GCRP, prior to April 13, 2021, when the GCRP Convention was held, if the SCGOP intended to cover the uncollected fees, as was reported to the Special Committee.

15. 360 Greenville County voters were certified and credentialed as either delegates or alternates to the GCRP Convention held on April 13, 2021, although they paid no convention registration fee and the \$20.00 convention registration fee had not been paid to the GCRP prior to the county convention. Officials with the SCGOP, of which the GCRP is a local affiliate, repeatedly assured both former and current GCRP officials of a donor(s) who would be paying the convention fees for these delegates. In conversations and texts sent by the SCGOP, the SCGOP stated that most of the money was received by the SCGOP prior to the GCRP Convention; however, it was not provided to the GCRP until on or about June 11, 2021.

16. The delegates and alternates referenced in Paragraph #15 did not intentionally do anything wrong or improper, as they had been permitted to sign up for the GCRP Convention without paying a registration fee and had been led to believe that the fee was being covered by an anonymous donor to the GCRP. This fee was subsequently provided by the SCGOP to the GCRP. Each of these delegates were qualified as voters residing in their respective Greenville County precincts to cast ballots for the GCRP officer positions and to elect delegates to the state party convention.

17. The Special Committee has no reason to believe that the “agents of the Party” intentionally did anything wrong or improper as they were instructed to sign up delegates and alternates without collecting convention registration fees and were told that an anonymous donor was making a contribution to the GCRP to cover the convention registration fees.

18. No GCRP funds are missing. Neither the immediate past nor current Treasurer of the GCRP “mishandled” any funds related to the 2021 GCRP convention. They can only “handle” funds received by the GCRP. Delegate fees for 360 Greenville County voters who were improperly credentialed to take part in the 2021 GCRP Convention on April 13, 2021, totaling \$7,200.00, were not received by the GCRP until June 11, 2021, approximately two months after the GCRP Convention was held and the officer elections were conducted.

19. The SCGOP Rules do not require the payment of a registration fee to attend a county convention.

20. Some South Carolina county Republican Parties require no county convention registration fees.

21. The GCRP does require a convention registration fee, and has done so for many years. Just from the first-hand knowledge of the Special Committee, this requirement of a county convention registration fee is a practice that goes back at least thirty (30) years.

22. The Special Committee, upon inquiry, was told by Mr. Leupp that the promise of the SCGOP to pay the uncollected convention registration fees was sufficient to permit those 360 Greenville County voters who paid no convention registration fee to take part in the April 13, 2021, GCRP Convention, even though no payment had been made as of the date of the GCRP Convention and we now know that payment by the SCGOP was only just made in June, some two months after the GCRP Convention was held.

23. The lack of collection of some 360 convention registration fees, amounting to \$7,200.00, is not the only “irregularity” the Special Committee found associated with the Greenville County voters signed up by “agents of the Party” in the interim period. 356 of the 385 Form 1s collected from Greenville County voters by “agents of the Party” during the interim period had redactions made in either a portion of or all of the block in the bottom right-hand corner of the Form 1 where financial information for the transaction is to be recorded. Additionally, 237 of the Form 1s collected from Greenville County voters by “agents of the Party” during the interim period were submitted with the lines for an email address and a telephone number left blank on the designated lines on the form, but did contain that contact information written on the back, on the otherwise “blank” side of the Form 1.

24. Mr. Leupp admitted that he directed that the redactions be made to the Form 1s in the financial information block. He explained that the redactions were made on hundreds of the Form 1s because the information redacted could have been misleading to or misinterpreted by a reader. He never did advise the Special Committee what the actual words or numbers were that were redacted.

25. Mr. Leupp also admitted that hundreds of Form 1s were intentionally completed without contact information being provided on the designated lines on the Form 1, but included instead on the back of the Form 1. The explanation given to the Special Committee for such actions was that the information written on the back of the Form 1 was not going to be disclosed

to other delegates because the person completing the form did not want his/her contact information shared with other delegates.

26. The Special Committee found no evidence that an announcement was made at any precinct reorganization meeting on March 22, 2021, that convention registration fees did not have to be paid or that any anonymous donor was going to pay such fees on behalf of others.

27. The Special Committee found no evidence that an announcement was made at any precinct reorganization make-up meeting held on April 6, 2021, that convention registration fees did not have to be paid or that any anonymous donor was going to pay such fees on behalf of others.

28. The Special Committee's investigation revealed that only those Greenville County voters who were signed up by "agents of the Party" in the interim period were told that the convention registration fee was being covered by an anonymous donor and were not required to pay a convention registration fee.

29. On Friday, April 9, 2021, registered delegates and alternates to the GCRP Convention to be held on April 13, 2021, received an email that contained a "delegate list" as an attachment. There were some two hundred persons identified on the list as delegates to the upcoming GCRP Convention for whom no email address was provided, at least 155 of whom had no contact information at all.

30. The only delegates who wrote an email address or telephone number on the back side of his/her Form 1 were those Greenville County voters who were signed up by "agents of the Party" in the interim period.

31. The names on the delegate list sent out by the GCRP on April 9, 2021, for whom email addresses and/or telephone numbers were not provided, were those Greenville County voters who were signed up by "agents of the Party" in the interim period.

32. SCGOP Rule 4(c)(5) which specifically requires that the county chairman make the certified list of delegates and alternates to the county convention available to any delegate, alternate or precinct officer no later than three (3) days after a make-up meeting, specifically to contain all contact information known to the county party, was not followed. To the contrary, the Special Committee's investigation revealed that the email addresses for approximately fifteen (15%) of the delegates, telephone numbers for approximately ten (11%) of the delegates, and home addresses for one hundred (100%) of the delegates, was intentionally and deliberately withheld. That information was known by the Greenville County Republican Party, but deliberately, and admittedly, was not shared with the registered delegates to the GCRP Convention.

33. The Special Committee, upon inquiry, was advised that the GCRP was not obligated to follow the directives of SCGOP Rule 4(c)(5) concerning a certified delegate list in the instance where a delegate did not wish to have his/her contact information provided to fellow delegates to the GCRP Convention. The Special Committee could find no authority, in law, Party Rules, or past practice, which supported that assertion.

34. The Special Committee has very diligently reviewed the SCGOP Rules governing precinct reorganization, including, but not limited to, SCGOP Rule 4. The limited guidance provided by the governing rules for the election of delegates and alternates to a Republican Party County Convention after the initial reorganization meeting has been concluded leaves a lot of room for differing interpretations, but the past practice of the GCRP on this issue is clear. For decades, the interpretation of the governing Rules has included a default to inclusion and increased participation in the Party. From the first-hand knowledge of members of the Special Committee, Greenville County voters approaching the GCRP after the initial precinct reorganization meeting, but before five (5) days prior to the GCRP Convention, have always been permitted to sign up to attend the county convention. Provided they completed the Form 1, submitted to the GCRP the required contact information, and paid the required convention registration fee, they were permitted to sign up as a delegate or an alternate. At whatever time they signed up, and paid the convention registration fee, such a Greenville County voter has always been considered to have been immediately elected as a “delegate” to the GCRP Convention, from his/her precinct, provided, of course, that an allocated delegate position for that precinct was still available. If not, that Greenville County voter signed up and paid to attend the GCRP Convention as an alternate. Accordingly, the only precinct delegate slots to be filled at the county-wide make-up meeting would be those precinct county convention delegate positions not already filled by other Greenville County voters from that precinct at the initial precinct reorganization meeting or at any other time prior to the make-up meeting.

35. The Special Committee, upon inquiry, is unaware of any “agents of the Party” ever previously having made an orchestrated effort to sign up Greenville County voters as delegates to the GCRP Convention during the period between the initial precinct reorganization meeting and the make-up meeting, as was obviously done in this Party reorganization cycle. In prior cycles, those Greenville County voters signing up as delegates in such an “interim period” contacted the GCRP desiring to become affiliated with the Party, not the other way around. There was never any reason to prohibit such affiliation and participation within the Party. Such affiliation and participation was always encouraged.

36. In 2021, for the first time, the GCRP Convention was held virtually. Voting for the three party offices elected at the county convention, as well as voting for county delegates to the SCGOP State Convention, was done electronically. A business known as Election Runner was contracted to provide the services necessary for the GCRP Convention voting to be conducted electronically, over the internet. Election Runner is a business unrelated to the GCRP, or any of its officers, that was paid a negotiated fee to provide the services rendered.

37. The Special Committee met with Mr. Leupp and reviewed with him procedures and data related to the Election Runner electronic voting system utilized at the GCRP virtual convention. Mr. Leupp and the Special Committee have been very careful with and protective of the sensitive data on the Election Runner system. One reviewing the data now is unable to determine who a delegate actually voted for, but one can see if the delegate voted and at what time the delegate’s ballot was successfully submitted.

38. The 2021 GCRP Convention was scheduled to take place as a virtual convention between the hours of 7:00 pm and 9:00 pm on the evening of Tuesday, April 13, 2021. In fact, the virtual convention did not technically end until the last convention delegate vote was successfully cast at 11:14 pm. Questions were raised, which in part led to the formation of the

Special Committee, concerning why any ballots were permitted to be cast, and counted in the final certified election results, after the published 9:00 pm ending time. The Special Committee carefully reviewed these questions and found appropriate, legitimate answers. At any regular “in-person” convention, alternates are moved up to the status of delegate at a certain time in the convention process, usually before the first vote is taken. During such an in-person convention, as delegates leave early, they are promptly replaced by a waiting alternate. The process for a virtual convention has to be different, and it was for the 2021 GCRP Convention. The two hour, 7:00 pm to 9:00 pm time window, was provided for registered delegates to obtain their ballots. At or shortly after 9:00 pm, if a registered delegate had not logged in to Election Runner to obtain his/her ballot, the first alternate in that delegate’s specific precinct had to be contacted and subsequently sent over the internet the credentials to electronically obtain and cast a valid ballot. That process was rigorously followed for each delegate in each precinct that failed to timely obtain a ballot. This was the first time this electronic voting process was utilized by the GCRP and it took time. Only duly authorized delegates, including some who had held the status of alternate at the beginning of the convention, were permitted to cast ballots at the GCRP convention.

39. The Special Committee, upon inquiry, was able to determine that at 9:00 pm on the evening of April 13, 2021, each of the three officer candidates who were ultimately declared to be the winners of the officer election contests, were winning in their respective races. In other words, if the election had simply been ended and the respective officer races called without permitting alternates to participate and cast ballots, the results would have been exactly the same. Black, Shea and Page would have been elected to their respective offices. The voting done by the alternates whose status was upgraded to delegate as certain delegates failed to timely obtain or cast ballots had no impact on the outcome of these officer elections.

40. The Special Committee found no evidence to support any allegation that anything wrong, improper, or irregular was done in any fashion related to the Election Runner voting procedures.

41. The Special Committee desires to make clear that the Election Runner voting procedures were properly utilized for Greenville County voters who had been credentialed as delegates or alternates to the GCRP Convention. Of course, as set forth above, hundreds of these credentialed delegates did not pay a registration fee, no registration fee had been paid for them, no contact information had been set forth related to them on the required certified delegate list, and for reasons unknown to the Special Committee, information on their Form 1s was redacted. The Special Committee finds only that so far as Election Runner is concerned, all information entered into the system concerning credentialed delegates appeared to be done properly and in good faith. No irregular operations or voting irregularities of any type were found by the Special Committee.

42. The Special Committee carefully reviewed allegations that fictitious names were created to be delegates, or that names of real people were wrongfully used, and delegate ballots cast, without their knowledge or consent. Without question, the actions at the center of such allegations, if they took place, would constitute fraud. The Special Committee found no evidence to support any such allegations, nor any reason to suspect any such wrongdoing.

43. The Special Committee reached out to a number of delegates whose contact information was not included on the delegate list, but was available to the Special Committee on the back of the Form 1s. Some of those contacts were made randomly. Others were made deliberately because of specific complaints or unusual facts brought to the attention of the Special Committee. Rigorous efforts were made by members of the Special Committee to ascertain the bona fides of persons who took part as delegates at the GCRP Convention, particularly those delegates whose contact information was intentionally withheld from the delegate list. No evidence was found to support any allegations of wrongdoing, nor did the Special Committee find any reason to suspect such improper actions. The Special Committee's investigation revealed that all persons credentialed and permitted to take part in the 2021 GCRP Convention were real people registered to vote in Greenville County who willingly and intentionally participated. This is the case even for those delegates who failed to pay a registration fee, had no registration fee paid for them, had no contact information set forth related to them on the required certified delegate list, and for reasons unknown to the Special Committee, had information on their Form 1s redacted.

44. The Special Committee found that Jeff Davis had submitted a nominating seconding speech that should have been played for him during the 2021 GCRP virtual convention, but was not played as part of the convention proceedings. Upon inquiry, the Special Committee learned that as a result of the software being used, the video sent by Mr. Davis as an attachment to an email was inadvertently overlooked. The Special Committee found no evidence to believe that the seconding video in question was intentionally left out of the convention proceedings.

CONCLUSION

The Special Committee has spent a significant number of hours diligently investigating all allegations of fraud or other forms of voting irregularities relating to the 2021 GCRP Reorganization and Convention. A lot of thought and careful analysis has gone into the preparation of this report. The Special Committee intends to attend the Special Meeting of the GCRP Executive Committee on July 6, 2021, to discuss this report, explain our work, and answer questions of the Executive Committee to the best of our ability. Please know, in advance, that we may not have the answer to some, even many, of your questions. The GCRP is a volunteer organization. The Special Committee consists of volunteers. We are all doing this on our own time. This is a political matter, not a legal proceeding. The Special Committee has no staff, no budget, and most significantly, no subpoena power. The Special Committee has no authority to force anyone to speak to us or to require anyone to turn over to us any documents or other materials they may have. All of the Special Committees investigative efforts were performed to the best of our abilities under such limitations.

Complaints have been made that the Special Committee has a conflict of interest, and cannot be trusted to properly perform the assigned task, because it was appointed by Jennifer Black, the Chairman elected at the same GCRP Convention resulting from the challenged reorganization process. The obvious implicit assumption, sometimes even expressly stated, is that the members of the Special Committee are not honorable enough to perform the assigned task and honestly report their findings. As is no doubt understandable to all, for obvious reasons, the members of the Special Committee reject such complaints and allegations. Jennifer Black is now the Chairman of the GCRP. Rule 6C of the Rules of the Greenville County Republican

Party expressly provides the Chairman the authority to select members of any Special Committee, including the Special Committee Chairman. No other person or entity has that authority. Each member of this Special Committee has devoted his/her time and effort, in good faith, to find and report the truth. We ask only that we be given the benefit of the doubt as you review and carefully consider our findings set forth in this report.

Respectfully submitted,

GCRP 2021 REORGANIZATION AND CONVENTION REVIEW SPECIAL COMMITTEE

Stephen H. Brown, Chairman

Evert Headley

Julie Hershey

Jeff Holmes

Stacey Owens

Tim Schuyler

Jennifer Black, ex-officio member, as GCRP Chairman pursuant to Rule 6A of the GCRP Rules.