

PENDING REVIEW FOR TAX LISTING

DATE 5/23/14 BY KH.



2014003691

HAYWOOD CO, NC FEE \$30.00
PRESENTED & RECORDED

05-23-2014 11:43:16 AM

SHERRI C. ROGERS
REGISTER OF DEEDS
BY: AMANDA GUTIERREZ
DEPUTY

BK: RB 866

PG: 1857-1872

State of North Carolina

NCGOP / HCGOP

County of Haywood

AFFIDAVIT

Charges leveled against Pat Carr, Chairman, Haywood County Republican Party (GOP) for violation of the North Carolina Party Plan of Organization by HCGOP Executive Committee Members.

Monroe A. Miller Jr.

Monroe A. Miller Jr., being first duly sworn deposes and says:

1. I am a Haywood County Taxpayer, and have lived in Haywood County since 2004.
2. Executive Committee Members of the Haywood County GOP called a Special Called Meeting on April 7, 2014, for the purpose of the removal of Pat Carr as Chairman of the HCGOP from office when Pat Carr created a Party Plan of Organization Convention committee of 3 without the advice, consent or knowledge of the Executive Committee. See attachment: 140409 Summary - Special Called Meeting 4-7-2014 - Carr.
3. Following the April 7, 2014 Special Called Meeting, a summary, and plan of continued action was created. See attachment: 140415 Charges Against Carr.
4. One-third (1/3) of the members of the Haywood County, ten (10) members, signed charges against Pat Carr, which would lead to a second Special Called Meeting. See attachment: 140522 Formal Charges Filed Against Pat Carr Signature Sheets.
5. I presented a copy of these charges to Pat Carr during a GOP "Round Table" meeting at the GOP headquarters on May 22, 2014 at approximately 7:00pm.
6. Brian Strum, Executive Secretary of the Haywood County GOP physically and forcefully grabbed the white envelop containing the charges and signatures, intercepting the envelop before it could be presented to Pat Carr, and threw the envelop on the ground.

7. I retrieved the white envelope and attempted to serve Pat Carr with the charges, and Pat Carr asked: "Do these charges contain the "original" signatures"?"
8. I indicated that Pat Carr would be getting copies of the signatures, and would not get the original signature sheets.
9. Pat Carr then said: "I do not accept these charges", and refused to take the white envelop.
10. These events were witnessed by sixteen (16) people attending the meeting, twelve (12) people were Executive Committee Members, and four (4) people were not Executive Committee Members.
11. Executive Committee Members present were:

Jonnie Cure
Barbara Buck
Monroe Miller
Eddie Cabe
Brian Strum
Hanna Strum
Wayne Wyles
Ted Carr
Pat Carr
Andrew Jackson
Matt Hebb
Debbie King

12. Non-Executive Committee Members present were:

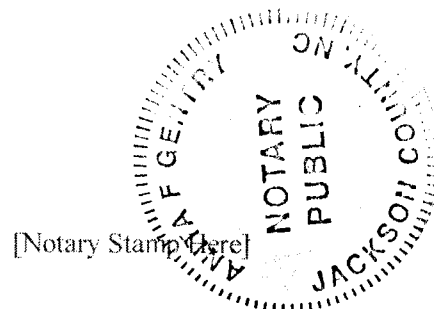
Savannah (last name unknown)
Lynda Bennett
Susan Brown
Samantha Battell

13. Todd Poole, Executive Director of the North Carolina GOP was appraised of the actions of Pat Carr and Brian Strum at the May 22, 2014 "Round Table" meeting at the GOP Headquarters.
14. The document, "140522 Formal Charges Filed Against Pat Carr Signature Sheets", was sent via e-mail to Todd Poole and every Executive Committee Member who provided an available e-mail address, and in addition, sent to, Michael McKnight, Katie Sullivan, Craig Collins and Pat Carr.
15. This Affidavit serves Pat Carr with the Charges and Signatures in the document: 140522 Formal Charges Filed Against Pat Carr Signature Sheets.

I swear under pains and penalties of perjury that the above is true and accurate.

This document is hereby recorded pursuant to Rules of Federal Evidence, 901 and 902. The preceding items of evidence are self-authenticating or identifying evidence; they require no extrinsic evidence of authenticity in order to be admitted.

Monroe A. Miller Jr.
Monroe A. Miller Jr.
19 Big Spruce Lane
Waynesville, NC 28786
(828) 456-3718
May 23, 2014



Jurat

Signed and sworn before me Aritz F. Gentry, on this day, the 23 day of May, 2013.

Signed: Aritz F. Gentry

Printed: Aritz F. Gentry

My commission expires on October 22, 2016

Monroe A. Miller Jr.
19 Big Spruce Lane
Waynesville, NC 28786
Vice-Chair, Allens Creek Precinct
April 9, 2014

Subject: Summary of the Special Called Meeting, April 7, 2014, Pat Carr charged.

The Special Called Meeting of the Executive Committee was called to order at 6:30pm by both Pat Carr and myself. After about ten (10) minutes of not getting very far, a very distinguished lawyer type walked into the room. He announced that his name was Craig Collins, a lawyer from Gastonia, and was sent here to attend this meeting by Todd Poole and Claude Pope, NCGOP. He offered any assistance in the way of procedure or other help.

Roll Call was eventually taken. There were 15 voting members present. A quorum was met, with the requirement being seven (7). The Roll Call list is appended to this Summary. Names encircled were present.

Members of the press attended the meeting. Vicki Hyatt [D], of the Mountaineer, had told me earlier in the day, that she had received an invitation to attend the meeting from Pat Carr. Jonathan Key, owner of the Mountaineer [R] accompanied Vicki Hyatt [D]. Becky Johnson [RINO], from the Smoky Mountain News, who had changed her party affiliation earlier in the day from DEM to REP was also present.

Eventually, motions were made and voted regarding the attending press, and the press was requested to leave the meeting.

After a point of order was called, Craig Collins ruled Pat Carr had the right to chair the meeting, so I stepped aside. However, the whole meeting was about removing Pat Carr, so a conflict of interest arose, and when Craig Collins was made aware of this, he advised Pat Carr to name another chair. Pat Carr named Craig Collins to chair the meeting.



Eddie Cabe made the following Motion:

I move that Pat Carr, Chairman of the Haywood County GOP, having failed to adhere to the North Carolina Republican Party Plan of Organization, when she created a "Party Plan of Organization Convention committee of 3 without the advice, consent or knowledge of the Executive Committee be removed from office. Further, Pat Carr is served notice to prepare a defense within two weeks, to present to another Called Special Meeting, upon which Pat Carr can be removed with a 2/3 vote of the Executive Committee.

Jonnie Cure added the following amendments to Eddie Cabe's motion:

WHEREAS, at the March 15, 2014, Haywood County Republican Convention, a report from a sol called Party Plan of Organization Committee was presented to the assembly presumably requesting * the Haywood County Republican Executive Committee be replaced in its entirety. If passed, the Executive Committee could have been reduced from approximately 30 to 5;

WHEREAS, the NC PoP states "In every odd-numbered year, the County Convention shall elect a County Executive Committee..." Notice was not given to the Haywood County Executive Committee that a Party Plan of Organization group was proposing their removal from office in an even-numbered year; and Haywood County Republicans were not notified that election of a new (significantly reduced) Executive Committee was being proposed during the 2014 Convention;

WHEREAS, we believe the actions of the Chair and the 2014 Party Plan of Organization group have injured the possibility of unity for the Executive Committee and the Chair to work together to accomplish the goals of placing in office Republican candidates. As a result of these actions, we believe the Chairman has lost the confidence of this body to serve as the Chairman of the Haywood County Republican Executive Committee.

Both the amendment and the motion passed. A name count was requested of how people voted, and that is reflected on the attached Roll Call Sheet. There is either a "Y", "N" or "X" after each encircled name, signifying a Yes, No, or Abstain. All voted Yes, with the exception of Brian and Hanna Strum, and Pat Carr abstained. Interestingly, (this is not a mistake), Ted Carr voted to remove his wife as chair.

The meeting adjourned.

After the meeting, I asked Craig Collins if this meeting served as notification to Pat Carr that she had been charged. He indicated in the affirmative.

I also offered to Craig Collins that I appreciated his presence at the meeting. There were three significant factors:

- Pat Carr was removed as chair at this meeting,
- Craig Collins conducted the meeting professionally, adhering to Parliamentary Procedures,
- and most impressively, was able to reduce the Temper temperature of everyone at the meeting.

I was very impressed, and hope he is available to assist with an upcoming meeting in approximately two weeks.

Monroe A. Miller Jr.
Vice-Chair, Allens Creek Precinct

Monroe A. Miller Jr.
19 Big Spruce Lane
Waynesville, NC 28786
Vice-Chair, Allens Creek Precinct
April 9, 2014

Subject: Formal Charges to be filed against Pat Carr from April 7, 2014 Meeting.

The Special Called Meeting of the Executive Committee was called to order at 6:30pm with the following Motion and Amendments approved (re: see roll call sheet appended at the end of this letter).

Eddie Cabe made the following Motion:

I move that Pat Carr, Chairman of the Haywood County GOP, having failed to adhere to the North Carolina Republican Party Plan of Organization, when she created a "Party Plan of Organization Convention committee of 3 without the advice, consent or knowledge of the Executive Committee be removed from office. Further, Pat Carr is served notice to prepare a defense within two weeks, to present to another Called Special Meeting, upon which Pat Carr can be removed with a 2/3 vote of the Executive Committee.

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Michael McKnight, of Ogletree Deakins Nash Smoak & Stewart in Raleigh [re: NCGOP], kindly spent over a half an hour on the phone with me yesterday answering some questions I had on this procedure. He indicated there is no precedent for this. I posed three (3) questions to him:

- A motion was read and passed at the April 7, 2014 Special Called Meeting. I had asked Craig Collins if this had served as Notice to Pat Carr for her to begin her Two Week defense period. Craig Collins indicated the meeting served Pat Carr Notice. What was Michael McKnight's opinion?

Michael McKnight indicated there is no precedence. We need to create a Notice of Charges, with the Intent to Remove, signed by 1/3 of the members of the Executive Committee.

- Who calls the second Special Called Meeting?

Craig Collins indicated that Pat Carr calls the second meeting. Michael McKnight indicated it must be called by the 1/3 members of the Executive Committee.

- Is there a time period that the Executive Committee can study Pat Carr's defense prior to the second Special Called Meeting. His opinion was that this would be like a trial, and the Defense would make the presentation at the "trial", then the Executive Committee members would then vote on Removal

It always is best to get second opinions, and since Michael McKnight is higher up on the food chain than Craig Collins, we will go with Michael McKnight's opinions.

One question that Michael McKnight raised himself, was, "Could this all be mediated?" Good question.

The first Special Called Meeting was signed by the following Executive Committee Members:

Eddie Cabe
Debbie King
Greg Burrell
Tomile Cure
Jonnie Cure
Lisa Womack
Ken Henson
Eleanor Worley
Mark Zaffrann
Andrew Jackson

In addition, the following people cast a "Yes" vote for the above Motion:

Ted Carr (this is not a mistake)
John Kihnel
Rebecca Mathews

The count for the Executive Committee now stands at 26, so 1/3 would be nine (9) Executive Committee Members signing this charge, any of the above.

I have created a "Charge" with a signature page(s) and both e-mail and send a hard copy to each of the above named individuals via USPS (excepting Ted Carr). The actual "Charge" is contained within the Motion. Please sign in your signature space and return it (either scanned via e-mail) or hard copy by via USPS, and I will assemble them all into a single document to be presented to Pat Carr.

The "Charge" and signature sheet(s) are the two last pages of this letter. Print it out and return to me at the above address or return the USPS hard copy signed.

Monroe A. Miller Jr.
Vice-Chair, Allens Creek Precinct

April 15, 2014

HCGOP Special Called Meeting,
Plaintiff,

v.

**FORMAL CHARGES FILED AGAINST PAT CARR
SIGNATURE SHEETS**

Pat Carr
HCGOP Chairman

Defendant

re: 140409 Summary - Special Called Meeting 4-7-2014 - Carr.pdf

The "Charge" is contained within the Motion of the Special Called Meeting on April 7, 2014.

I move that Pat Carr, Chairman of the Haywood County GOP, having failed to adhere to the North Carolina Republican Party Plan of Organization, when she created a "Party Plan of Organization Convention committee of 3 without the advice, consent or knowledge of the Executive Committee be removed from office. Further, Pat Carr is served notice to prepare a defense within two weeks, to present to another Called Special Meeting, upon which Pat Carr can be removed with a 2/3 vote of the Executive Committee.

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Eddie Cabe

Date

Debbie King

Date

Greg Burrell

Date

Tomile Cure

Date

Jonnie Cure

Date

Lisa Womack

Date

Ken Henson

Date

Eleanor Worley

Date

Mark Zaffrann

Date

Andrew Jackson

Date

John Kihnel

Date

Rebecca Mathews

Date

April 15, 2014

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Plaintiff,

v.

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HCGOP Chairman

Defendant

APR 18 2014

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Eddie Cabe
Eddie Cabe

4/16/2014
Date

Debbie King

Date

Greg Burrell

Date

Tomile Cure

Date

Jonnie Cure

Date

Lisa Womack

Date

April 15, 2014

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Plaintiff,

v.

Pat Carr
HCGOP Chairman

Defendant

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SIGNATURE SHEETS

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Eddie Cabe

Date

Debbie King


Date

Greg Burrell

Date

Tomile Cure

Date



4-15-14

Jonnie Cure

Date

Lisa Womack

Date

April 15, 2014

HCGOP Special Called Meeting,
Plaintiff,

v.

FORMAL CHARGES FILED AGAINST PAT CARR
SIGNATURE SHEETS

Pat Carr
HCGOP Chairman

Defendant

APR 15 2014

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Monroe Miller
MONROE MILLER

5/6/2014
Date

Eddie Cabe

Date

Debbie King

Date

Greg Burrell
Greg Burrell

5-3-14
Date

Tomile Cure

Date

Jonnie Cure
Jonnie Cure

4-15-14
Date

Lisa Womack

Date

Ken Henson
Eleanor Worley
Eleanor Worley

Date
07/17/14
Date

Mark Zaffrann

Date

Andrew Jackson

Date

John Kihnel

Date

Rebecca Mathews

Date

APR 19 2014



Ken Henson

5-8-14

Date

Eleanor Worley

Date

Mark Zafirann

Date



Andrew Jackson

5-8-14

Date

John Kihnel

Date

Rebecca Mathews

Date

Ken Henson

Date

Eleanor Worley

Date

Mark F. Zaffrann

5/15/2014

Mark Zaffrann

Date

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Rebecca Mathews

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Ken Henson

Date

Eleanor Worley

Date

Mark Zaffrann

Date

Andrew Jackson

Date

John Kihncl

Date

Rebecca Mathews
Rebecca Mathews

5/19/14
Date