



NORTH CAROLINA

STATE BOARD OF ELECTIONS

COMPLAINT AGAINST COUNTY BOARD OF ELECTIONS MEMBER

P.O. Box 27255
Raleigh, NC
27611-7255
Mailing Address

legal
@ncsbe.gov
E-mail

(919) 814-0700 or
(866) 522-4723
Phone

(919) 715-0135
Fax

*Submitting fraudulently or falsely
completed declarations is a Class I
felony under Chapter 163 of the
General Statutes.*

Instructions (08 NCAC 03 .0101)

Any voter desiring to bring charges of a violation of the North Carolina Administrative Code or of Chapter 163 of the North Carolina General Statutes with the State Board of Elections against a member of any county board of elections may do so by filing with the Board a written statement, signed and sworn under oath or affirmation of the voter. The statement must contain:

- 1) the name, residence address, and county of the member against whom the charges are brought;
- 2) a statement of the facts constituting the violation alleged, with a reference to the date and place of such misconduct; and
- 3) the names and addresses of persons who have knowledge or information of the matters referred to in the charges as filed.

Visit <https://bit.ly/2Z89VtS> for all requirements.

1

Information About Person Filing Complaint

James K. Womack, Jr.

Lee

Name

County

1615 Boone Trail Rd

Address

Sanford

NC

27330

City

State

Zip Code

james.k.womack@gmail.com

919-770-4783

E-Mail Address

Telephone Number

2

Information about County Board Member Against Whom You are Filing a Complaint

Linda Shoemaker Devore

Cumberland

Name

County

1413 Brentwood Place

Address

Fayetteville

NC

28304

City

State

Zip Code

Date the alleged violation occurred:

Continuously from at least March 1, 2025 through May 4, 2025

Place the alleged violation occurred:

On-line Zoom Meetings, Emails, Phone Conversations



Provide a statement of the facts constituting the violation alleged.

Be as specific as you can, providing all relevant facts and circumstances of the potential violations.

You should also include a citation to the applicable rule, law, or duty you believe has been violated. 08 NCAC 03 .0102 states that the State Board shall set a hearing if the charges preferred include prima facie evidence of any of the following: “(1) a violation of these Rules or of any election law under Chapter 163 of the North Carolina General Statutes; (2) a breach of a duty imposed by Chapter 163; or (3) participation in irregularities, incapacity, or incompetency to discharge the duties of the office.” **Attach additional pages if needed.**

--See Attached Affidavit --



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**Description of Violation
(continued)**

--See Attached Affidavit --



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Names &
Addresses of
Persons who
Have Knowledge
Related to the
Charges Filed

Provide the names and addresses, so far as you know, of persons who have knowledge or information of the matters referred to in the charges as filed.
Attach additional pages if necessary.

Roxan Maureen Wetzel

Name #1

488 Fern Valley Dr.

Address

Marion

NC

28752

City

State

Zip Code

Janice Eileen Quilty

Name #2

1413 Brentwood Place

Address

Fayetteville

NC

28304

City

State

Zip Code

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Attestation

I hereby swear or affirm, under penalty of perjury and other penalties established by North Carolina law, that the information provided in this complaint is true, correct, complete, and of my own personal knowledge, or if not, I believe the information to be true based upon the following:

X

Signature of Complainant

Date

5-6-2025

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Notarization

State of North Carolina, County of Lee

Sworn to (or affirmed) and subscribed before me,

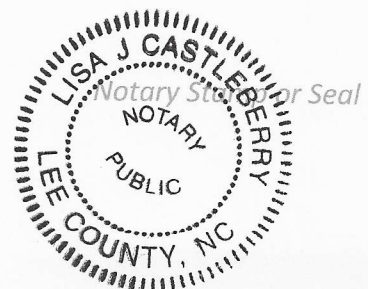
This 10th day of May, 2025

Signature of Notary Public:

Printed Name of Notary Public:

Lisa J Castleberry

My Commission Expires Aug. 17, 2028



A-F-F-I-D-A-V-I-T

In accordance with NCGS 163-30(b)(2) no "officer" of a political party is eligible to serve concurrently as a county board of elections member.

In consultation with Associate General Counsel Steele of the NCSBE, seeking clarification on the definition of "officer," I received this advice- *"The definition of "office" depends on the official governing documents for the party because NCGS 163-30 does not define "office" or "officer." We have traditionally interpreted "office," as that term is used in NCGS 163-30(b)(2) to refer to an official party officer. These positions are typically identified and described in a party's plan of organization, and would generally include a President, Vice President(s), Secretary, Treasurer, Chair, Vice Chair, and anyone else the political party or political organization itself deems an office or officer."*

Please note the governing document of the NCGOP is the current State Party Plan of Organization, found at this link:

https://assets.nationbuilder.com/ncgop/mailings/27635/attachments/original/2024_NCGOP_Plan_of_Organization.pdf?1743705278

Article VI.B.4.(a) of the document indicates: *"The State Chair, with the advice and consent of the Central Committee, shall have general supervision of the affairs of the Party within the State. In addition to overseeing the general operation of the Party, the State Chair shall be the primary fundraiser for the Party. He shall preside at all meetings of the State Executive Committee and shall perform such duties as may be prescribed by the State Executive Committee...The State Chair shall appoint the temporary officers of the State Conventions."* (Note- these temporary officers include state Credentials Committee Chair as outlined in Section VII.D.3. of the same document.)

This language clearly refers to the State Party's temporary appointments as "officers" of the party. They are vested with and exercise all the rights and privileges of senior, partisan political decision makers. In this case, Ms. Devore has for two months been busy deliberating over thousands of prospective delegates to attend the state convention and actively disallowing participation by some otherwise eligible delegates. This position is a very powerful, partisan influence in the party with delegated powers and authority much greater than those of precinct, county, or district officers who are clearly prohibited from serving on county boards of elections. In fact, the Chairman of the NCGOP Credentials Committee has the ability to shape the attendance at state convention to serve nefarious purposes like manipulating election results, controlling votes on party platform and plan of organization changes, etc.

There is discernable conflict of interest with someone serving in such a senior partisan position while also deliberating important non-partisan matters as a sitting county board of elections member. A local board of elections member must *not* be improperly motivated or influenced by partisan concerns that might impact judgment on contentious local election issues- including contested (partisan) primary races in his or her home county.

Ms. Devore's significant role in state party credentialing could well come into conflict as she is appointed by the state party chair and serves his interests in state, district, and local party races with potential to influence selection and support of candidates running for office. In fact, Ms. Devore has so aggressively administered her credentialing committee that one member of the committee was recently compelled to resign and others have communicated claims of a discordant committee environment. This is not the sort of personality the state should permit on a local or state board of elections.

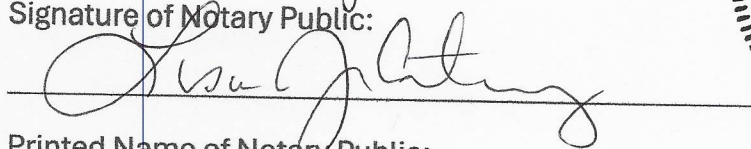
I have requested that Ms. Devore resign as State Credentials Committee Chair, and she has refused. Therefore, it is incumbent on the NCSBE to discharge Ms. Devore from her seat on the Cumberland County Board of Elections. She has consciously chosen to serve in conflicting capacities, in direct violation of NCGS 163-30, and therefore needs state board action to relieve her from the conflict.

State of North Carolina, County of Lee

Sworn to (or affirmed) and subscribed before me,

This 6th day of May 2025

Signature of Notary Public:



Printed Name of Notary Public:

Lisa J Castleberry

My Commission Expires Aug 17, 2028

