



# 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 1  
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**

Bob Hall	Orange	
<i>Name</i>	<i>County</i>	
5706 Old Stony Way		
<i>Address</i>		
Durham	NC	27705
<i>City</i>	<i>State</i>	<i>Zip Code</i>
sprc@mindspring.com	919-489-1931	
<i>E-Mail Address</i>	<i>Telephone Number</i>	

**2  
Information  
about County  
Board Member  
Against Whom  
You are Filing a  
Complaint**

Linda S. Devore	Cumberland	
<i>Name</i>	<i>County</i>	
2616 Dartmouth Drive		
<i>Address</i>		
Fayetteville	NC	28304
<i>City</i>	<i>State</i>	<i>Zip Code</i>

**Date the alleged violation occurred:**  
on or about January 2023 and thereafter

**Place the alleged violation occurred:**  
Cumberland County, North Carolina







# NORTH CAROLINA

## STATE BOARD OF ELECTIONS

**4**  
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.

Juanita Maria Gonzalez

Name #1

222 Wickford Court

Address

Fayetteville

NC

28314

City

State

Zip Code

Nina Douglas Morton

Name #2

227 Hillsboro Street

Address

Stedman

NC

28391

City

State

Zip Code

**5**  
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:

interviews, affidavits, documents and attachments

X

*[Handwritten Signature]*

3/27/26

Signature of Complainant

Date

**6**  
Notarization

State of North Carolina, County of Orange

Sworn to (or affirmed) and subscribed before me,

This 27<sup>th</sup> day of March, 2026

Signature of Notary Public:

*[Handwritten Signature]*

Printed Name of Notary Public:

Jose Gonzalez Chavez

My Commission Expires 06-11-2030



**ATTACHMENT FOR PAGES 3 & 4 FOR  
"COMPLAINT AGAINST LINDA S. DEVORE"**

Linda Devore's problematic actions came to my attention in relation to her involvement in an apparent campaign finance violation, but two more areas of activities described below raise substantial problems with her continued service on the Cumberland County Board of Elections. Based on the information below, I am petitioning the State Board for the removal of Devore under its authority "to remove from office any member of a county board for incompetency, neglect or failure to perform duties, fraud, or for any other satisfactory cause" [NCGS 163-22(c)]

**Biased Leadership**

Linda Devore has been a member of the Cumberland County Board of Elections (CCBOE) since 2019. Since becoming CCBOE chair in July 2025, she has repeatedly misused her authority to advance her personal agenda. As recently as the 2026 primary, she twice inappropriately and negligently insisted that a canopy tent promoting certain candidates should remain inside the 50-foot buffer zone at an early voting site. In response to complaints, CCBOE staff asked the tent occupants to move to the electioneering area



designated by the CCBOE in a January 2026 Board action, which the occupants were willing to do. But Devore intervened and directed that the tent could remain in place. The CCBOE director then visited the site and sent Devore photographs of the tent within the buffer zone, which is well-marked with a white line. The CCBOE director noted in the email, "Everyone needs to be treated the same." Nevertheless, Devore directed that the tent and signs remain in place, in violation of state law. And so the tent remained, sending the damaging message that the CCBOE gives favored treatment to some groups over others.

As early as August 2025, Devore began demonstrating an authoritarian and intimidating type of leadership as board chair. She insisted on her choices for new Republican poll workers as chief judges and judges, despite warnings of their lack of experience and the better option to begin their service as assistant judges. Eight or nine of these new appointees failed to fill out their required paperwork, despite reminders by the staff. They also failed to respond to notices to attend trainings in September 2025 before the October municipal primary. Nevertheless, Devore repeatedly pushed staff to give unusual, favored treatment to these Republican judges. Frustrated, the CCBOE director asked the State Board of Elections for guidance in how far to go to provide exceptional treatment to one group of judges. Not surprisingly, many of these new judges had to be replaced before the 2026 primary.

Devore's authoritarian leadership has impacted election boards in other counties, as illustrated by a press release she ordered CCBOE staff to distribute on the day before the 2026 primary. Without consulting with the State Board of Elections or her CCBOE colleagues, Devore provided the wording for a March 2, 2026 press release that announced election night results could be delayed "due to a state-required software update to the election reporting system." The announcement was picked up and spread across the state, generating confusion and calls from the public to county boards of elections. In the midst of their busy pre-Election Day activities, some counties decided it was necessary to issue their own announcement to counteract the one from Cumberland County. This is an example of the statewide effect of Devore's strong-willed and poor leadership that turns her personal opinions into dictates that override responsible decision-making and that harm public confidence in the election process.

Devore's leadership is also inflicting unacceptable harm on the people who administer elections in Cumberland County. Observers at CCBOE meetings describe her frequent "belittling," "bullying" and "beating up" CCBOE staff members. In one recent meeting, Devore ridiculed another board member, who was not born in the United States, by saying she has "not culturally assimilated" to this country. Combined with her other actions, I urge the State Board to conclude that Devore is not fit to serve as chair of the CCBOE.

### **Political Party Quasi-Treasurer**

Unlike many county parties, the Cumberland County Republican Party (CCGOP) has an annual audit committee. The chair is elected each year by the CCGOP Executive Committee. Linda Devore told me she created the audit committee when she was CCGOP chair in 2013 because of problems with financial recordkeeping in earlier years. CCGOP members told me they recognize Devore has a personal investment in the audit committee and she is routinely nominated and elected to serve as its chair each year. She is an attorney, a self-described "numbers person," smart and strong-willed.

Devore told me the function of the annual audit is to reconcile the CCGOP's bank statements with the balances on the campaign finance reports and ensure that there are receipts for all expenses. Maintaining accurate financial records with proper documentation of income and expenses is the core duty of the treasurer. Devore said the audit committee may also provide recommendations for improved financial policies and notify the treasurer of corrections needed for campaign reports. The treasurer is always a member of the audit committee.

In practice, it appears that the CCGOP audit committee and its chair oversee and essentially supervise the work of the treasurer. State law prohibits a treasurer from serving as a county board of elections member for good reason [NCGS 163-30(b)(3)]. The inherent conflict of interest is perhaps even greater for a party's audit committee chair who serves on the county board of elections. If the audit committee chair identifies a major campaign finance violation, which direction does she turn: internally, to clean up

or cover up a problem, or externally, to report a significant violation to the State Board of Elections? County boards of elections do not handle campaign finance complaints, but they are charged with the fair administration of election laws. The board chair in particular must not “fail or neglect, willfully or of malice, to perform any duty, act, manner or thing required . . . to be performed in relation to any primary, general or special election” [NCGS 163-274(11)].

### **Failure to Report Possible Felony Violation of Election Law**

This brings me to the matter of Brenda Eldridge \$25,000 contribution that is the subject of my campaign finance complaint filed today. The complaint is summarized below. It is not necessary to prove Eldridge’s *actual violation* of the state’s campaign finance laws before it is appropriate to hold Linda Devore responsible for failing to report her knowledge of an *apparent violation* by Eldridge. The contribution occurred in 6466, but a felony violation has no statute of limitation in North Carolina. Devore had a duty to report her information in 2022, as well as in 2025 when Brenda Eldridge was appointed to the Cumberland County Board of Elections, and even now.

According to the attached affidavits, Devore possessed and communicated information to other Republican Party members about a \$25,000 contribution that a reasonable person would understand to be illegal. Her failure to report her information to the State Board of Elections amounts to a violation of her oath of office to “be faithful and bear true allegiance to the State of North Carolina and to the constitutional powers and authorities which are or may be established for the government thereof. . . .” [NCGS 163-30(e)]. That failure means the public cannot have faith that Devore will carry out her fundamental duties as a board of elections member without favor or bias, including the responsibility of the county board to “investigate irregularities, nonperformance of duties, and violations of laws by election officers and other persons, and to report violations to the State Board of Elections.” [NCGS 163-33(3)].

Here are substantive facts related to Brenda Eldridge’s \$25,000 contribution in 2022:

- Linda Devore is an attorney and longtime leader of the Cumberland County Republican Party (CCGOP). She is a former CCGOP chair and received the State Board of Elections’ training for treasurers in 2016. She is routinely elected to chair the annual audit committee of the CCGOP. She chaired the audit committee that reviewed the financial activity for 2022, which included the period of a fundraising event featuring General Michael Flynn. She resigned from that audit committee after its first meeting.
- The minutes of the December 7, 2021 meeting of the Executive Board of CCGOP show that (page 3) the CCGOP chair, Brenda Eldridge, presented plans for a fundraising event with Gen. Michael Flynn as the featured speaker. It includes this statement about Eldridge: “She has raised the speaking fee of \$25,000 to secure General Michael Flynn to speak.”

- Bank records show that on March 1, 2022, a personal check for \$25,000 signed by Brenda Eldridge and payable to the Cumberland County Republican Party was deposited in the Truist Bank for the general fund of the Cumberland County Republican Party (CCGOP).
- In a recorded interview, Richard Button, who was the CCGOP treasurer in early 2022, recalls Eldridge telling him that she raised money for the \$25,000 contribution from other donors. Eldridge told him that “she had been able to contact some friends or friend or whatever that wanted to help get General Flynn in, and so she gave the money under her name.” He added, “It was money given to her to be used for that [purpose].” Button left Cumberland County in July 2022 and now lives in Minnesota.
- An internal CCGOP financial report of the fundraising event’s income and expenses identifies the source of the \$25,000 contribution as “Private Donations” – note the plural “Donations.” By contrast, the report lists the source of income from each single individual as “Individual” (without a name), next to the amount the individual donated.
- Making a contribution with someone else’s money or in the name of another donor is a violation of NC General Statute 163-278.14(a). In addition, NCGS 163-278.27(c) states, “A person or individual who intentionally violates G.S. 163-278.14(a) or G.S. 163-278.19(a) and the unlawful contributions total more than ten thousand dollars (\$10,000) per election is guilty of a Class I felony.” A felony offense has no statute of limitation in North Carolina.
- Affidavits from two members of the 2025 CCGOP Executive Board attest that Linda Devore told them in 2025 that she resigned from the 2022 audit committee because she believed Eldridge’s \$25,000 contribution was a violation of law and was the same type of violation involving straw donors that resulting in Dinesh D’Souza going to prison. D’Souza is a prominent conservative commentator and author; he was convicted of a felony in 2014 for violating federal campaign finance laws.
- One of those affidavits is from Juanita Gonzalez, a CCGOP leader who served with Linda Devore on the audit committee in 2025. Devore chaired the audit committee that year. Gonzalez is only person to have been elected to the Cumberland County Board of Education, Cumberland County Board of Commissioners, and Fayetteville City Council. In her affidavit she describes a conversation with Devore in early 2025, during a break in the work of the audit committee: “Linda Devore told us that she had to get off of Brenda’s audit committee because she and Brenda disagreed with what was being put down for the \$25,000. Linda is always on the audit committee, every year. But Linda told us that she could not be on the audit committee for Brenda because of the \$25,000. She didn’t want to sign off on an audit that she knew was not correct. She said making donations by using other people’s money was what sent Dinesh D’Souza to prison.”
- In my conversation with Linda Devore, she acknowledged mentioning Dinesh D’Souza

in 2025 and in the first meeting of the 2022 audit committee when the \$25,000 contribution was discussed – but in both instances she said she was “just making a joke.” She denied telling anyone that there was something wrong with Eldridge’s \$25,000 contribution.

- An affidavit from Nina Morton describes a conversation with Devore in 2024 that contradicts Devore’s denial. Nina Morton became CCGOP chair after Eldridge’s term ended, and in one Executive Committee meeting the two women got into a heated argument about recording a financial transaction between the CCGOP General Fund and CCGOP Building Fund. After the meeting, Devore called Morton and told her she was surprised with how Eldridge acted considering “what she did . . . with the \$25,000.” Given Devore’s words, Morton concluded Devore knew something was wrong with how Eldridge handled the \$25,000.
- Based on interviews, affidavits and the attached documents, it seems apparent that Devore had knowledge of, or reason to believe, that a campaign violation had occurred with the \$25,000 contribution, but she failed to report her information to county elections officials or the State Board of Elections.

In summary, I am petitioning the State Board of Elections to remove Linda Devore from the Cumberland County Board of Elections in accordance with NCGS 163-22(c) for “incompetency, neglect or failure to perform duties, fraud, or for any other satisfactory cause.” Other statutes are also relevant to this petition, including (but not limited to) those referenced in this petition, such as NCGS 163-30, NCGS 163-33, and NCGS 163-274.

#### **ATTACHMENT FOR PAGE 4**

Persons with knowledge or information of the matters referred to in the charges as filed:

Juanita Maria Gonzalez, 222 Wickford Court, Fayetteville, NC 28314

Nina Douglas Morton, 227 Hillsboro Street, Stedman, NC 28391

Venus Recod De La Cruz, 240 Summertime Road, Fayetteville, NC 28303

Calista Breann Cuevas, 5316 Bluewater Place, Fayetteville, NC 28311

Angela Amaro, 227 Fountainhead Lane, Fayetteville, NC 28301

Irene C. Grimes, 3918 Colorado Drive, Hope Mills, NC 28348