



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**

Joshua Dovi	Cumberland
<i>Name</i>	<i>County</i>
2078 Lothbury Drive	
<i>Address</i>	
Fayetteville	NC
<i>City</i>	<i>State</i>
joshdovi@me.com	28304
<i>E-Mail Address</i>	<i>Zip Code</i>
	3522015377
	<i>Telephone Number</i>

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

Linda Devore	Cumberland
<i>Name</i>	<i>County</i>
<i>Address</i>	
<i>City</i>	<i>State</i>
	<i>Zip Code</i>

Date the alleged violation occurred:
April 27th, May 1st, May 18th

Place the alleged violation occurred:
Cumberland County Board of Elections offices.

III. APPLICABLE RULES, LAWS, AND DUTIES

This complaint is filed pursuant to **08 NCAC 03 .0101**, which permits any voter to file charges against a member of a county board of elections with the State Board of Elections. The charges herein are submitted in writing, signed and sworn under oath or affirmation, as required.

Pursuant to **08 NCAC 03 .0102**, the State Board of Elections is required to set a hearing upon receipt of charges that include prima facie evidence of one or more of the following:

- (1) A violation of the State Board's rules or of any election law under Chapter 163 of the North Carolina General Statutes.
- (2) A breach of duty imposed by Chapter 163; or
- (3) Participation in irregularities, incapacity, or incompetency to discharge the duties of the office.

The Complainant alleges that the conduct of the Respondent described herein constitutes violations under grounds (1), (2), and/or (3) above, as further detailed in Section IV.

Additionally, the Respondent's conduct may implicate duties and obligations imposed by **N.C.G.S. Chapter 163**, including but not limited to the duties of county board members to act in accordance with law and to refrain from conduct constituting irregularity or incompetency in the exercise of official duties. The authority of the State Board over county board members is grounded in **N.C.G.S. § 163-22(c)**.

IV. STATEMENT OF FACTS AND ALLEGED VIOLATIONS

A. Pattern of Conduct Regarding Voting Equipment

On multiple occasions prior to the specific incidents described below, the Chairwoman engaged the Complainant in prolonged and repeated conversations regarding the County's voting equipment. These conversations, which frequently lasted approximately one hour, involved the Chairwoman repeatedly questioning the reliability and security of the voting machines and suggesting that the equipment was inadequate to capture voters' votes in a timely manner and did not meet proper security specifications. The Complainant, acting in the course of their official duties, consistently advised the Chairwoman that the equipment met all required specifications and functioned without interruption to voters, and directed her to the vendor's authoritative guidance. Despite these repeated assurances, the Chairwoman continued to raise unfounded concerns, demonstrating a pattern of interference with staff functions and a potential lack of competency to discharge her duties as Chair.

B. April 27 — Private Pre-Meeting (approximately 1:30 PM)

Prior to a mandatory all-staff meeting called by the Chairwoman, the Complainant was summoned into a private office by the Chairwoman. During this private meeting, the Chairwoman stated that the office Director did not have authority to create office policy and that an existing policy established by the Director would not be permitted. The

Complainant was then interrogated as to why they had approved of the policy and was subsequently asked whether they had a personal reason for supporting it. This inquiry, into the Complainant's personal circumstances in relation to a policy matter constitutes an inappropriate and coercive use of the Chairwoman's position. The Chairwoman further declared that the policy would not be approved because, in her words, she is the Chair, suggesting unilateral decision-making authority inconsistent with the statutory structure governing county boards of elections under Chapter 163.

C. April 27 — Staff-Only Meeting (approximately 3:00 PM)

The Chairwoman subsequently convened a private, staff-only meeting in which she announced that she would be making all policy decisions for the office and that any employee concerns about office matters were to be directed solely to her, with her retaining sole discretion to determine whether such concerns would be elevated to the full Board. This directive, if implemented, would improperly concentrate authority in a single Board member, the Chair, rather than the Board as a whole, in potential violation of the collective governance structure required under Chapter 163. This conduct may constitute a breach of duty and participation in irregularities in the discharge of official duties.

D. April 27 — Prolonged Confrontation in Complainant's Office (4:00 PM – 5:20 PM)

The Chairwoman entered the Complainant's personal office and engaged in a prolonged, one-sided confrontation lasting approximately one hour and twenty minutes. During this time, the Chairwoman repeatedly, on at least eight separate occasions, demanded to know the personal reason behind the Complainant's support for the Director's policy. Despite the Complainant stating clearly and repeatedly that the matter was private and that they did not wish to discuss it, the Chairwoman persisted. The Chairwoman's stated justification, to create an understanding in order to offer a personal exception to the Complainant; while denying the policy to all other staff, was explicitly identified by the Complainant as favoritism.

The Chairwoman remained in the Complainant's office after 5:00 PM when other staff had departed, continuing to impede the Complainant's ability to complete work tasks. The Complainant felt unsafe asking the Chairwoman to leave out of a reasonable fear of retaliation. During this encounter, the Complainant also reasonably believed they were being recorded without their consent, a concern that had arisen on prior occasions while being questioned privately by this chairwoman. While North Carolina is one party consent state to recordings; topics discussed are those of voter rights, concerns that supersede the one-party consent standing.

Prior to these events, the Chairwoman sent an office-wide email stating that no employees' jobs were at risk and attaching a news article indicating that prior disciplinary charges against her had been dismissed by the State. The Complainant was previously unaware of any such disciplinary proceedings placing staff in general and Complainant in an uncomfortable and awkward position. The following day, the Complainant learned that the Director had been placed under investigation and placed on administrative leave despite the previous day's email indicating that no jobs or

employees were threatened. This sequence of events caused the Complainant to reasonably fear for their own employment.

E. May 1 — Closed Special Meeting (approximately 1:00 PM)

The Chairwoman scheduled a special closed meeting, which the Complainant understood to be a general staff meeting regarding the Director's policy. In fact, the meeting was convened specifically and exclusively to question the Complainant about their role in the policy and to compel disclosure of the personal medical matter underlying their support for it.

During this meeting, before the full Board, the Chairwoman pressured the Complainant to disclose a sensitive personal and family health matter. Despite the Complainant's repeated refusals and explanations that the matter was private, the Chairwoman continued to press until the Complainant was effectively compelled to disclose protected personal health information. This conduct constitutes a violation of the Complainant's privacy rights and may implicate protections under the Health Insurance Portability and Accountability Act (HIPAA), as well as applicable state law protections regarding the confidentiality of personal health information. After the disclosure was forced, the Chairwoman expressed personal discomfort, further illustrating the absence of any legitimate official purpose for demanding the information.

F. May 18 — Private Email Offering Newly Created Position (Potential Improper Inducement)

On or about May 18, the Chairwoman sent the Complainant a private email encouraging them to apply for a higher-level management position within the office. Notably, this position did not yet exist at the time of the email; the Chairwoman indicated she was in the process of having it created. The Chairwoman acknowledged in the email that the Complainant had previously been informed of this opportunity and had declined interest in it.

The Chairwoman's stated rationale for renewing this offer was the Complainant's demonstrated professional ability to assume greater responsibility during the Director's absence, an absence directly resulting from the Director being placed under investigation and administrative leave, circumstances the Chairwoman herself set in motion through her aggressive involvement in office affairs and staff matters as described throughout this complaint.

This email was sent in close temporal proximity to the coercive and boundary-violating conduct documented above, including the forced disclosure of protected personal information at the May 1 closed meeting. The Complainant views the offer as an improper inducement, in effect, a professional bribe, intended to discourage the Complainant from reporting or opposing the Chairwoman's conduct. The creation of a new position of authority by a Board Chair, offered privately to an employee who has been subjected to the Chairwoman's pattern of pressure and coercion, raises serious concerns about the integrity of the office and the Chairwoman's fitness to discharge her duties.

The Complainant acknowledges the professional significance of having their work recognized, but their ethical obligations require that this email and the circumstances surrounding it be fully disclosed to the State Board. The Chairwoman's conduct, including this offer, continue(s) to call into question her judgment, her impartiality, and her adherence to the duties imposed upon her by Chapter 163 of the North Carolina General Statutes, to the detriment of Cumberland County voters and the integrity of the state-regulated elections office.

V. GROUNDS FOR CHARGES

Based on the foregoing facts, the Complainant respectfully asserts that the Chairwoman's conduct constitutes prima facie evidence of one or more of the following grounds under **08 NCAC 03 .0102**:

- **Violation of election rules or election law under Chapter 163 (Ground 1):** The Chairwoman's unilateral assertion of authority to control all office policy, override the Director, and dictate which employee concerns reach the Board may constitute a violation of the governance structure required by Chapter 163 for county boards of elections.
- **Breach of duty imposed by Chapter 163 (Ground 2):** County board members have statutory duties to act collectively and lawfully. The Chairwoman's conduct in assuming sole authority, intimidating staff, overriding the Director's administrative decisions, and offering improper inducements to employees constitutes a breach of those duties.
- **Participation in irregularities, incapacity, or incompetency (Ground 3):** The Chairwoman's persistent unfounded questioning of certified voting equipment, her coercive interrogation of an employee regarding personal health matters, her apparent disregard for employee privacy rights, her potential recording of an employee without consent, her efforts to create a new office position as a private inducement to a staff member she had subjected to pressure and coercion, and her overall pattern of intimidation and self-serving conduct collectively demonstrate incompetency and irregularity in the discharge of her official duties.



NORTH CAROLINA

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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.

Name #1

Address

City

State

Zip Code

Name #2

Address

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:

Joshua Dovi

X

Joshua Dovi

Signature of Complainant

Date

6/2/2026

6

Notarization

State of North Carolina, County of CUMBERLAND

Sworn to (or affirmed) and subscribed before me,

This 24th day of JUNE, 2026

Signature of Notary Public:

Jennifer Bell Bradham

Printed Name of Notary Public:

JENNIFER BELL BRADHAM

My Commission Expires 01-27-2027

Notary Stamp or Seal

