



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

Etsil Mason

Pitt

Name

County

4192 West Lang St.

Address

Farmville

NC

27828

City

State

Zip Code

etsilmason@gmail.com

252-753-4513

E-Mail Address

Telephone Number

2

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

Neal Driver

Pitt

Name

County

104 NORTH LONGMEADOW ROAD

Address

GREENVILLE

NC

27858

City

State

Zip Code

Date the alleged violation occurred:

March 27, 2026 through April 21, 2026

Place the alleged violation occurred:

Greenville, Pitt County



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 statement

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper has a slight shadow on the right side, suggesting it's resting on a surface. There is no handwriting or other markings on the paper.

**Description of Violation
(continued)**

See attached statement

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NORTH CAROLINA

STATE BOARD OF ELECTIONS

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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.

see attached statement

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:

X *[Signature]*

Signature of Complainant

6/18/2026

Date

6

Notarization

State of North Carolina, County of Pitt

Sworn to (or affirmed) and subscribed before me,

This 18th day of June, 2026

Signature of Notary Public:

[Signature]

Printed Name of Notary Public:

Josh Olmsted

My Commission Expires

3/6/2027



NORTH CAROLINA

BEFORE THE NORTH CAROLINA
STATE BOARD OF ELECTIONS

WAKE COUNTY

IN RE. COMPLAINT OF ETSIL MASON
AGAINST PITT COUNTY BOARD
CHAIR NEAL DRIVER

**COMPLAINT ALLEGATIONS AND
SUPPLEMENTARY MATERIALS**

The following allegations pertain to the complaint of Etsil Mason against Pitt County Board of Elections Chair Neal Driver and are incorporated into that complaint by reference. Potential witnesses are identified below the allegations.

INTRODUCTION

1. The chair of a county board of elections is responsible for ensuring that the county board and its staff operate in accordance with the law. The Pitt County Board Chair, Neal Driver, has not lived up to that responsibility. Instead, Driver has conducted board business in secret, in violation of North Carolina's Open Meetings Law. He also instructed the county director of elections to fire a member of the county board staff, something neither he nor the director had the authority to do without board approval. Not only was this firing unauthorized; it was also for an illegal purpose. Driver directed the firing in retaliation for the staff member's complaint of harassment and bias in the workplace, including complaints about the director's conduct toward poll workers, which violates federal civil rights law and

the First Amendment of the United States Constitution. The State Board should hear these allegations and remove Driver from his position.

FACTUAL ALLEGATIONS

2. Respondent Neal Driver is the chair of the Pitt County Board of Elections. At all times relevant to this complaint, he was the chair of the Pitt County Board.

3. Complainant Etsil Mason is a member of the Pitt County Board of Elections. At all times relevant to this complaint, she was a member of the Pitt County Board.

4. In February 2026, the [REDACTED] for the county board, [REDACTED], filed a complaint with Driver alleging a hostile working environment under newly installed director of elections Janet Turner. [REDACTED], who is black, had been working at the county board for over three years at that point, helping to conduct five separate elections. Turner, who is white, was hired as deputy director of elections in May 2025, and was promoted to director of elections on January 1, 2026, after working one election.

5. [REDACTED]'s complaint alleged that her supervisor, the director of elections, regularly chastised her and demeaned her work with no justification—sometimes in front of members of the public, falsely accused her of improperly recording her time, blamed her for deficiencies in work that the director was responsible for, and denied her volunteer support to complete pre-election tasks while other staff members received such support.

6. Driver did not address [REDACTED]'s complaint.

7. Having received no response to her complaint, [REDACTED] requested assistance with the county human resources department, who directed [REDACTED] to file her complaint with the State Board. State Board staff instructed [REDACTED] to pursue her complaint with the county board. The county human resources department agreed that Driver, the chair, should address the complaint.

8. [REDACTED] requested Driver to conduct an investigation into the complaint, and he never responded. On March 11, Mason, who had become aware of the allegations in [REDACTED]'s complaint, asked Driver to conduct interviews with the staff to investigate the allegations in [REDACTED]'s complaint.

9. In response to Mason's request, Driver organized two meetings with a quorum of the county board members to interview county board staff. The impetus for these meetings was to address the allegations of a hostile work environment under Director Turner, but in announcing the interviews to staff, Driver wrote, "we don't want this to be a meeting where we spend a lot of time on complaints and personal gripes." Driver never provided public notice of these meetings.

10. On March 20, 2026, four members of the county board, including Driver and Mason, interviewed four staff members.

a. One of the staff members reported that some chief judges of elections had confided that they would never work elections again under Director Turner due to her demeaning behavior toward the chief judges. The

staff member reported that Turner publicly dressed down multiple judges on election night, March 3, 2026.

b. Three staff members reported that, under Turner, there was constant tension in the office, with Turner regularly dressing down █████ in front of the entire office staff.

c. Another staff member gave a specific example of how Turner treated █████ differently than the rest of staff by refusing to allow █████ to make use of volunteer assistance from poll workers to accomplish pre-election tasks—something other staff members were allowed to do.

At no point in this interview did any staff member raise any question or concern about █████'s job performance.

11. On March 27, 2026, three members of the county board, including Driver and Mason, interviewed █████ about the situation in the office. █████ elaborated on her concerns about the working environment under Director Turner. She also raised concerns with how Turner had treated poll workers poorly in a public setting. Driver repeatedly questioned █████ on her recollections and accounts, displaying a skepticism of █████'s complaints—something he had not done with the other four staff members who reported concerns. Later in the interview, █████ said, "Mr. Driver, I think you have a bias against me." In response to the concern █████ raised about Driver's impartiality, Driver became visibly upset and was defensive. He argued that he has no biases at all and then cut the

interview short. At no point in this interview did Driver or any other board member raise any question or concern about ██████'s job performance.

12. Driver met with Director Turner the following week and, upon information and belief, directed Turner to dismiss ██████ from her employment with the county board, based in whole or in part on ██████'s complaints about the chair's bias.

13. On April 6, Turner served paperwork on ██████ purporting to dismiss her from her position. One of the grounds for the termination was ██████'s alleged hostile tone toward the board members during the March 27 interview. On information and belief, Driver instructed Turner to pursue this as a basis for dismissal. It was false, however. ██████'s tone was not hostile; she was calm and candid when raising concerns about her work conditions. It was Driver who became hostile at the suggestion of his bias.

14. The next day, on April 7, an employee from county human resources conducted a pre-dismissal hearing with ██████, with both Driver and Turner in attendance. Approximately 15 individuals—most of whom are longtime poll workers for the county—came to attend the hearing in support of ██████. Mason also attended. No one other than the hearing officer and ██████ were permitted to speak. After the hearing, Driver, Turner, and the human resources employee met privately.

15. Also on April 7, Mason asked Driver to hold a closed session at the next county board meeting so the entire board could address these issues. Driver

responded that he would do so at the next board meeting, which was scheduled for April 15.

16. On April 8, Driver reversed course, telling Mason that he was declining to hold a closed session at the April 15 meeting unless Mason offered specific topics to be addressed in closed session.

17. On April 9, Mason explained that the board needed to address the [REDACTED] dismissal process and, based on advice from the county manager, the county board should wait until its next board meeting to address the personnel matter. Driver responded that [REDACTED]'s dismissal would not wait until the next board meeting and that he would be authorizing Turner to terminate [REDACTED]'s employment, without board involvement.

18. The Pitt County Board has never adopted a resolution setting forth the duties of Director Turner. Whether in resolution form or in some other official action, the county board has never authorized Turner to hire and fire county board staff. Nor has the county board authorized its chair to do this. Therefore, under N.C.G.S. § 163-33(10), only the county board, acting collectively, is authorized to hire and fire board staff.

19. The next day, April 10, on information and belief, Driver contacted Turner, purporting to authorize her to terminate [REDACTED]'s employment, and [REDACTED] was removed from her position that same day.

20. On April 14, Mason met with board member Debbie Avery to seek Avery's assistance in calling a closed session to discuss the personnel issues at the

board meeting. Avery said she would discuss it with Driver and, on information and belief, she did discuss it with Driver; but Driver refused to conduct a closed session with the board on personnel issues.

21. Later that day, Director Turner circulated an agenda for the April 15 meeting which included no closed session. On information and belief, Driver approved that agenda.

22. On April 15, having been denied any opportunity for the board to discuss and consider in closed session the deeply concerning personnel matters taking place among the board staff, and after the Board chair and director took it upon themselves to fire a longtime staff member without legal authority to do so, Mason complained about these issues during the board's open meeting.

23. On April 21, Driver and the two other Republican appointees to the county board conducted an unnoticed and private meeting and agreed upon a statement to send to the media opposing the statements from Mason that she made at the April 15 meeting. The statement was characterized as an official act of the County Board, despite there having been no noticed meeting or vote in an open meeting on the statement. The two Democratic appointees on the county board were not notified about this meeting or the contents of the statement.

24. On April 23, Driver filed a complaint against Mason with the State Board which is pending as of the date of this complaint.

LEGAL ALLEGATIONS

25. Driver violated the Open Meetings law, N.C.G.S. § 143-318.12, by convening a quorum of the board to purport to conduct county board business and take action as a board without notice to the public, on three separate occasions—on March 20, March 27, and April 21, 2026.

26. Driver violated an election law, N.C.G.S. § 163-31(d), by convening a meeting of the board without notifying two of the members of the board, on April 21, 2026.

27. Driver violated an election law, N.C.G.S. § 163-33(10), by authorizing the termination of a board employee without a board vote.

28. Driver violated the federal Civil Rights Act of 1964, 42 U.S.C. § 2000e-3(a), by directing the termination of a board employee in retaliation for her raising a complaint of a hostile work environment and racial bias.

29. Driver violated the First Amendment of the United States Constitution by directing the termination of a public employee in retaliation for concerns she raised about a matter of public concern—the director’s abusive behavior toward fellow election officials in public, which would undermine the public’s faith in their elections and undermine the ability to adequately staff polling places with members of the public willing to serve in those positions.

30. Driver has subjected the county board to unacceptable legal risk through the forgoing actions.

31. The foregoing actions by Driver constitute violations of the election laws and duties imposed by Chapter 163, and the participation in irregularities and incompetency to discharge the duties of the office of chair of the county board of elections, such that a hearing must be conducted on these charges under 08 NCAC 03 .0102.

32. The foregoing actions by Driver also constitute failure or neglect of a county board member to comply with any part of the election laws imposing duties upon a county board; incompetency, neglect or failure to perform duties; and “other satisfactory cause” that would justify the State Board’s removal of Driver from his position under N.C.G.S. § 163-22(c).

For the foregoing reasons, Etsil Mason requests that the State Board hear her complaint and remove Neal Driver from his position as chair of the Pitt County Board of Elections.

Dated: June 18, 2026


Etsil Mason

Acknowledgement

STATE OF North Carolina
COUNTY OF Pitt

I certify that Etsil Maron personally appeared before me this day, acknowledging to me that he or she signed the foregoing document: Complaint Form.
Name or description of attached document

I further certify that (select one of the following identification options):

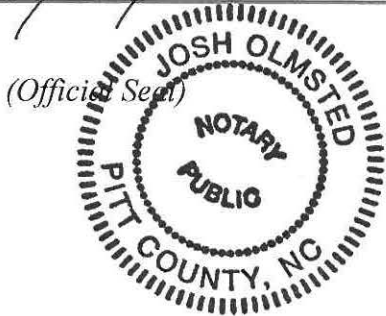
☐ I have personal knowledge of the identity of the principal(s)

☒ I have seen satisfactory evidence of the principal's identity, by a current state or federal identification with the principal's photograph in the form of a NC Driver License.
type of identification

☐ A credible witness, _____, has sworn or affirmed to me the
name of credible witness

identity of the principal, and that he or she is not a named party to the foregoing document, and has no interest in the transaction.

Date: 6/18/2026



[Signature]
Notary Public

Josh Olmsted
Typed or Printed Notary Name

My commission expires: 3/6/2027

WITNESSES TO THE FACTS IN THE COMPLAINT

Etsil Mason, member of Pitt County Board
(contact info on complaint form)

Neal Driver, chair of Pitt County Board
(contact info on complaint form)

Debbie Avery, member of Pitt County Board
3010 Sapphire Lane
Winterville, NC 28590

Kenton Moyer, member of Pitt County Board
2101 Sir Raleigh Ct
Greenville, NC 27858

Janet Turner, director of elections for Pitt County
1800 North Greene St., Suite C
Greenville, NC 27834

[REDACTED] for Pitt County Board
[REDACTED]
[REDACTED]

Dawn Peaden, Tammy Murchinson, and C J Wethington, county board staff
members
1800 North Greene St., Suite C
Greenville, NC 27834