

**VIRGINIA:**

**IN THE CIRCUIT COURT OF CAMPBELL COUNTY**

REPUBLICAN PARTY OF VIRGINIA, and	)	
	)	
CAMPBELL COUNTY REPUBLICAN	)	
COMMITTEE,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CL
	)	
CAMPBELL COUNTY ELECTORAL	)	
BOARD, and	)	
	)	
KELLY L. MARTIN, in her official capacity	)	
as General Registrar for Campbell County,	)	
	)	
Defendants.	)	
	)	
	)	
	)	

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**VERIFIED PETITION FOR WRIT OF MANDAMUS  
AND  
COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

1. Plaintiffs Republican Party of Virginia and Campbell County Republican Committee bring this action seeking declaratory relief pursuant to Virginia Code § 8.01-184, injunctive relief pursuant to Virginia Code § 8.01-620 *et seq.*, and a writ of mandamus pursuant to § 8.01-644 *et seq.*, against the Campbell County Electoral Board (“Electoral Board”) and Ms. Kelly L. Martin, in her official capacity as General Registrar and Director of Elections for Campbell County (collectively, “Defendants”) to prevent Defendants’ continuing violation of Article II, § 8 of the Virginia Constitution and Virginia Code §24.2-115 and to require their compliance with the rights and duties set forth therein.

## JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to Virginia Code §§ 8.01-620, 8.01-184, and 8.01-644.

3. Venue is proper in this Court pursuant to Virginia Code § 8.01-261.

## PARTIES

4. Plaintiff Republican Party of Virginia (“RPV”) is one of the two major political parties in Virginia, empowered by law to “make its own rules and regulations, . . . provide for the nomination of its candidates[,] . . . [and] perform all other functions inherent in political party organizations.” Va. Code § 24.2-508. It is also a “party” or “political party” for purposes of Virginia Code § 24.2-115. *See* Va. Code § 24.2-101 (defining “Party” or “political party”). Plaintiff has an interest in defining for itself who speaks on its behalf and in ensuring that the 2025 general election is and is perceived to be free and fair.

5. Plaintiff Campbell County Republican Committee (“CCRC”) is the county unit of the Republican Party of Virginia for Campbell County. *See* Republican Party of Va., Plan of Organization Art. VI (adopted Aug. 16, 2025).

6. Defendant Campbell County Electoral Board is the board appointed pursuant to Virginia Code § 24.2-106 to administer elections for Campbell County. *See* Va. Code § 24.2-101 (defining “Electoral Board”).

7. Defendant Kelly L. Martin, in her official capacity as General Registrar and Director of Elections for Campbell County, was appointed by the electoral board of Campbell County pursuant to Virginia Code § 24.2-110. *See* Va. Code § 24.2-101 (defining “General Registrar”).

## STATEMENT OF FACTS

8. Defendants persist in two ongoing violations of the Code of Virginia, to the detriment of the fair conduct of elections in Campbell County, and the rights of Plaintiffs as one of the two major political parties in Campbell County.

9. Article II, § 8 of the Constitution of the Commonwealth of Virginia provides: “Each electoral board shall appoint the officers of election and general registrar for its county or city. In appointing such officers of election, representation, as far as practicable, shall be given to each of the two political parties which, at the general election next preceding their appointment, cast the highest and next highest number of votes.”

10. Among the election officers, “[t]he electoral board shall ensure that one officer is designated as the chief officer of election and one officer is designated as the assistant for each precinct. The officer designated as the assistant for a precinct, whenever practicable, shall not represent the same political party as the chief officer for the precinct.” Va. Code § 24.2-115.

11. Only where representatives of the two largest political parties are “unavailable” may citizens who do not represent either political party be designated chief or assistant chief election officer. *Id.*

12. In such cases, “the general registrar shall provide notice to representatives of both parties at least 10 days prior to the election that he intends to use nonaffiliated officers so that each party shall have the opportunity to provide additional nominations.” *Id.*

13. Chief and assistant chief election officers are to receive training “not less than three nor more than 30 days before each election.” *Id.*

14. In addition, Va. Code § 24.2-115 provides, “[t]he representation of the two parties shall be equal at each precinct having an even number of officers and shall vary by no more than

one at each precinct having an odd number of officers. If practicable, officers shall be appointed from lists of nominations filed by the political parties entitled to appointments.... If practicable, no more than one-third of the total number of officers appointed for each precinct may be citizens who do not represent any political party.”

15. These legal requirements are mandatory and non-discretionary.

16. Despite these mandatory requirements, Defendants have persistently refused to provide the required party parity across precincts. Indeed, in Brookneal precinct, only one election official is a Republican, and in Gladys precinct, there are no Republican election officials.

17. Defendants have ample Republican election officials available, as there are more than 40 such officials, and only 17 total precincts including the Central Absentee Precinct (“CAP”).

18. Katherine Decker, the Chairwoman of the CCRC, and Chris Marston, general counsel for RPV, have made repeated combined requests in writing to Defendant Martin to ensure as much as practicable party parity across all precincts. In all events, there should be at least two Republican election officers at each precinct, including one Republican election officer as either chief or assistant chief at each precinct.

19. Yet as of this filing, Defendants’ latest list of election officials includes numerous precincts with less than two Republican elections officials. Indeed, Morris Church has only one Republican election official, and Brookneal and Gladys have no Republican election officials. (A list of proposed election officials provided by Defendants is attached as **Exhibit A**).

20. Defendants have continued to refuse to honor their mandatory requirements under the law.

21. On September 15, 2006, the Attorney General of Virginia issued an official advisory opinion interpreting Virginia Code § 24.2-115. 2006 Va. Att’y Gen. Op. No. 06-058, 2006 WL



4286452 (Sept. 15, 2006). The Attorney General’s opinion stated: “The use of [the] word ‘shall’ ordinarily implies that such provisions are mandatory” in reference to Article II, § 8, and Virginia Code § 24.2-115. The Attorney General went on to interpret “practicable” as synonymous with “feasible,” and concluded: “It is my opinion that the Constitution of Virginia requires a local electoral board, where it is feasible to do so, to appoint officers of election who represent the two dominant political parties. It is further my opinion that when it is not feasible to appoint representatives of such parties, a board may appoint nonpartisan officers of election.”

22. “Although it is not binding on this Court, an Opinion of the Attorney General is ‘persuasive’ and may be used as an aid in construing legislative intent.” *Nejati v. Stageberg*, 286 Va. 197, 203 (2013).

23. On October 2, 2023, the Attorney General of Virginia issued an advisory opinion echoing the conclusions of the Commonwealth’s Attorney General in 2006. 2023 Va. Att’y Gen. Op. No. 23-031, 2023 WL 6537837 (Oct. 2, 2023). There, the Attorney General reiterated that party parity should be achieved wherever “practicable”—*i.e.*, wherever it is “feasible to do so”—and concluded: “[I]t is my opinion that, when appointing officers of election, an electoral board must make its appointments with an effort to ensure party parity among appointments to the extent practicable and that appointees are to be chosen, to the extent practicable, from nominations provided by the respective qualifying political parties pursuant to law. It is my further opinion that the duty to ensure party parity to the extent practicable applies to every electoral board, regardless of the size of the jurisdiction.”

24. Virginia courts have found it feasible to appoint chief and assistant chief officers of election just seven days prior to election day. *See Order, Republican Party of Va. v. Prince William Cnty. Electoral Bd.*, No. CL22-008769 (Nov. 2, 2022) (attached hereto as **Exhibit B**)

25. By letter dated July 17, 2025, the Republican National Committee (“RNC”) and RPV notified the Electoral Board of its failure to comply with Virginia Code § 24.2-115 in its administration of the November 5, 2024, election (attached hereto as **Exhibit C**). The RNC and RPV identified fifteen precincts across Campbell County that listed a chief and assistant chief officer of election who did not meet the requirements of § 24.2-115, despite there being “61 officers of election representing the Republican Party” who were available to serve as officers of election across Campbell County’s seventeen precincts during that election. The RNC and RPV also informed the Electoral Board that “[o]fficers representing the Republican Party are available to serve as chiefs and assistant chiefs,” asserted that “it is practicable to appoint them so that all precincts can meet the requirements of the [Virginia] Code,” and stated its interest in ensuring that the assignment of chief and assistant chief officer of election comply with Virginia law for the November 4, 2025, general election.

26. On July 29, 2025, F.E. “Tripp” Isenhour, III, the Campbell County Attorney, responded to the RNC’s July 17, 2025, letter (attached hereto as **Exhibit D**). In his response, Mr. Isenhour stated that Defendants had sent a letter to all election precinct workers on July 21, 2025, requesting “that those who are willing to designate their party should do so” and “specifically request[ing] individuals [to] designate their willingness to serve in the leadership role of chief or assistance [*sic*] chief.”

27. On October 21, 2025, the RNC and RPV replied to Mr. Isenhour’s correspondence (attached hereto as **Exhibit E**). The RNC and RPV identified four precincts in which Defendants had failed to assign either a Republican chief or assistant chief officer of election: (1) Precinct 102 (New London); (2) Precinct 202 (Bedford Springs); (3) Precinct 601 (Kings); and (4) Precinct 702 (Gladys).

28. Subsequently, Defendants sent to the Chair of the Campbell County Republican Committee the following notice: "In compliance with §24.2-115 of the Code of Virginia, members of the Campbell County Electoral Board and the General Registrar are providing notice to the Democratic and Republican Party of Campbell County, VA that we intend to use nonaffiliated election officers in the upcoming November General and Special Election. If you wish to provide a list of Democratic or Republican nominations to serve as election officials, you must do so in writing within 10 days from the date of this email." (attached hereto as **Exhibit F**).

29. Based upon the information provided by Defendants, as of this date, Defendants have refused to assign a Republican chief or assistant chief officer of election to **three precincts**:

Precinct 102 (New London);

Precinct 701 (Brookneal);

Precinct 702 (Gladys).

30. Appointment of Republican chief or assistant chief election officers in these precincts, as well as the appointment of no less than two total Republican election officers in each precinct, is feasible because there is a sufficient number (over 40) of Republican officers available to serve in those positions.

31. Defendants have been given ample notice of their obligations under Virginia law, they have received several requests to respect the rights of Plaintiffs, and they have ample time to bring each precinct into compliance. Despite these circumstances, Defendants have intentionally refused to comply with the law.

32. The failure to appoint chief and assistant chief election officers who represent Plaintiffs, and the failure to appoint at least two total Republican election officers in each precinct harms Plaintiffs by denying them their rights under the Virginia Constitution and statutes and by

limiting Plaintiffs' ability to ensure a free and fair election for its members and nominees. The purpose of these legal requirements is straightforward: It allows each party to have a hand in the administration of the election. By allowing Democrats to see what Republicans are doing and Republicans to see what Democrats are doing, the citizens of Campbell County can be confident that neither party gained an unfair advantage in the election through the means of election administration.

33. The failure to appoint chief and assistant chief officers of election from different political parties, and to seek party parity including at minimum no less than two total Republican election officials per precinct, harms Plaintiffs. Plaintiffs have an interest in seeing that the 2025 general election not only *is* fair but also *is perceived* as fair. For the reasons described above, the appointment of officers of election from different political parties and a minimum of two total Republican election officers in each precinct improves the perception of fairness in election administration and public confidence in election results.

34. Defendants' failure to enforce the Commonwealth's election administration requirements described above harms Plaintiffs and violates Article II, § 8 of the Constitution of Virginia and Virginia Code § 24.2-115.

**COUNT 1**  
**Declaratory Judgment**  
**Va. Code § 8.01-184**

35. The allegations set forth above are reincorporated herein.

36. Plaintiffs are entitled to a judicial declaration that Defendants have violated the requirements of Article II, § 8 of the Constitution of Virginia and Virginia Code § 24.2-115.

**COUNT 2**  
**Temporary & Permanent Injunction**  
**Va. Code § 8.01-620 *et seq.***

37. The allegations set forth above are reincorporated herein.

38. Plaintiffs are entitled to a temporary and permanent injunction prohibiting Defendants from appointing chief or assistant chief election officers that do not comply with the requirements of Article II, § 8 of the Constitution of Virginia and Virginia Code § 24.2-115 and affirmatively requiring them to appoint at least one Republican election officer to the position of chief or assistant chief officer in each precinct in Campbell County, and at least a total of two Republican election officers to each precinct.

**COUNT 3**  
**Writ of Mandamus**  
**Va. Code § 8.01-644 *et seq.***

39. The allegations set forth above are reincorporated herein.

40. Plaintiffs are entitled to a writ of mandamus requiring Defendants to comply with the requirements of Article II, § 8 of the Constitution of Virginia and Virginia Code § 24.2-115 by appointing at least one Republican election officer to the position of chief or assistant chief officer in each precinct in Campbell County, and to seek party parity, including appointing a minimum of two total Republican election officials at each precinct.

**REQUESTED RELIEF**

Plaintiffs respectfully request that this Court:

- (1) Assume jurisdiction over this matter and maintain jurisdiction until Defendants comply with the requirements of Article II, § 8 of the Constitution of Virginia and Virginia Code § 24.2-115 and any and all orders of this Court.
- (2) Grant Plaintiffs' Motion for Temporary Restraining Order, being filed concurrently with this Complaint.

- (3) Immediately enjoin Defendants from proceeding with the appointment of the chief and/or assistant chief officers of election in the precincts identified in ¶ 29, *supra*, pending the appointment of Republican representatives.
- (4) Permanently enjoin Defendants from appointing chief and/or assistant chief officers of election in the precincts identified in ¶ 29, *supra*, pending the appointment of Republican representatives.
- (5) Issue a permanent injunction requiring Defendants to appoint Republican election officers to the positions of chief or assistant chief election officers in all precincts and in the precincts set forth in ¶ 29, *supra*.
- (6) Issue a permanent injunction requiring Defendants to achieve as close to parity as possible between the parties at each precinct, including no less than two total Republican election officials at each precinct.
- (7) Issue a writ of mandamus requiring Defendants to appoint Republican election officers to the positions of chief or assistant chief election officers in all precincts and in the precincts set forth in ¶ 29, *supra*.
- (8) Issue a writ of mandamus requiring Defendants to achieve as close to parity as possible between the parties at each precinct, including no less than two total Republican election officials at each precinct.
- (9) Grant Plaintiffs other such relief as the Court deems just and proper.

Dated: October 24, 2025

Respectfully submitted,

REPUBLICAN PARTY OF VIRGINIA  
CAMPBELL COUNTY REPUBLICAN  
COMMITTEE

By Counsel:



Rick Boyer

*Counsel for Plaintiffs*

**VERIFICATION**

Pursuant to Va. Code § 8.01-4.3, I verify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

October 24, 2025



KATHERINE DECKER, ESQ.

**CERTIFICATE OF SERVICE**

I certify that on this 24<sup>th</sup> day of October 2025, a true courtesy copy of the foregoing pleading was served on the parties and counsel via hand delivery and via email, at the addresses indicated below:

**Kelly Martin**

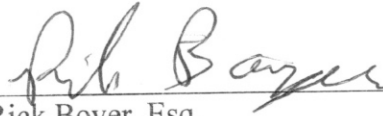
Campbell Co. Registrar  
41 Courthouse Lane  
(P.O. Box 103)  
Rustburg, VA 24588  
klmartin@co.campbell.va.us

**Campbell County Electoral Board**

41 Courthouse Lane  
(P.O. Box 103)  
Rustburg, VA 24588.  
cmmartula@co.campbell.va.us  
drwooldridge@co.campbell.va.us  
dmraner@co.campbell.va.us

**F. E. "Tripp" Isenhour, III**

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*Counsel for Plaintiffs*

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# **EXHIBIT A**



First Name	Last Name	Party	Precinct	Role
Cheyenne	Myers	R	Altavista	Assistant Chief
Debra	Kiraly	D	Altavista	Chief
Tommie	McCune	D	Altavista	Election Officer
Irma	Slayton	D	Altavista	Election Officer
Hannah	Derrick	N	Altavista	Election Officer
Carol	Haskins	N	Altavista	Election Officer
Margaret	Martula	N	Altavista	Election Officer
Audrey	Payne	N	Altavista	Election Officer
Margaret	Stevens	N	Altavista	Election Officer
Brian	Davis	R	Altavista	Election Officer
Crystal	Passley	R	Altavista	Election Officer
Houston	Walthall	R	Bedford Springs	Assistant Chief
Marquita	Martin	I	Bedford Springs	Chief
Linda	Anthony-Austin	N	Bedford Springs	Election Officer
Edwin	Hanson	N	Bedford Springs	Election Officer
Leanne	Hanson	N	Bedford Springs	Election Officer
Edward	Martin	N	Bedford Springs	Election Officer
Larry	Scott	N	Bedford Springs	Election Officer
Angela	Moore	R	Bedford Springs	Election Officer
Erica	Duffy	N	Brookneal	Assistant Chief
Jamie	Dickerson	D	Brookneal	Chief
Edith	Burks	D	Brookneal	Election Officer
Diane	Harvey	D	Brookneal	Election Officer
Eunique	Solomon	D	Brookneal	Election Officer
Adejai	Chambers	N	Brookneal	Election Officer
Judy	Hamlette	N	Brookneal	Election Officer
Christine	Jennings	N	Brookneal	Election Officer
Kenneth	Jennings	N	Brookneal	Election Officer
Audrey	Jones	N	Brookneal	Election Officer
Linda	Carroll	R	Brookville	Assistant Chief
Sandra	Bost	N	Brookville	Chief
Ronnie	Durie	D	Brookville	Election Officer
John	Jones	N	Brookville	Election Officer
Cynthia	Bryant	R	Brookville	Election Officer
Michael	Christensen	R	Brookville	Election Officer
Brenda	Mini	R	Brookville	Election Officer
Brenda	Davidson	R	Central Absentee Prec	Assistant Chief
Anne	Williams	R	Central Absentee Prec	Chief
Valeria	Chambers	D	Central Absentee Prec	Election Officer
Charlotte	Bryant	N	Central Absentee Prec	Election Officer
Rebecca	Coates	N	Central Absentee Prec	Election Officer
Anne	Smith	R	Central Absentee Prec	Election Officer
Robert	Moeller	N	Concord	Assistant Chief
Jeremiah	Melvin	R	Concord	Chief
Amy	CasaGrande	N	Concord	Election Officer
Dorothy	Dove	N	Concord	Election Officer
Shelby	Litchford	N	Concord	Election Officer



Robert	Finson	R	Concord	Election Officer
Sandra	Mayo	R	Concord	Election Officer
George	McDonald	R	Concord	Election Officer
James (Jim)	Bowman	R	Courthouse	Assistant Chief
Larry (Bud)	Pickett	D	Courthouse	Chief
Claude	Bryant	D	Courthouse	Election Officer
Katherine	Bryant	D	Courthouse	Election Officer
Patricia	Jones	D	Courthouse	Election Officer
Carrie	Alleman	N	Courthouse	Election Officer
Chelta	Bailey	N	Courthouse	Election Officer
Tabatha	Robertson	N	Courthouse	Election Officer
Robert	Sarver	R	Courthouse	Election Officer
Patricia	Worrell	R	Courthouse	Election Officer
Morris	Dews	D	Evington	Assistant Chief
Gerilyn	Doss	R	Evington	Chief
Duann	Kremer	D	Evington	Election Officer
Robert	Brown	N	Evington	Election Officer
Thelma	Carlson	N	Evington	Election Officer
Mary	King	N	Evington	Election Officer
Teresa	Tharp	N	Evington	Election Officer
Kathy	Johnson	R	Evington	Election Officer
Ruth	Wallisky	R	Evington	Election Officer
Marvena	Lockett	N	Gladys	Assistant Chief
Shenda	Scott	D	Gladys	Chief
Dianetta	Easley	D	Gladys	Election Officer
Marcee	Jones	D	Gladys	Election Officer
Diann	Lovelace	D	Gladys	Election Officer
Floyd	Scott	D	Gladys	Election Officer
Jennifer	Doubrey	N	Gladys	Election Officer
James	Elliott	N	Gladys	Election Officer
Shawntae	Nowlin	N	Gladys	Election Officer
Beverly	Puckette	N	Gladys	Election Officer
David	Gifford	R	Kings	Assistant Chief
Yvette	Harris	D	Kings	Chief
Melody	Callahan	D	Kings	Election Officer
Betty	Corbin	D	Kings	Election Officer
Phyllistine	Mosley	D	Kings	Election Officer
Kathy	Cornett	N	Kings	Election Officer
Ken	Cornett	N	Kings	Election Officer
Lillian	Marie	N	Kings	Election Officer
Charleen	Fogarty	R	Kings	Election Officer
John	Davidson	R	Morris Church	Assistant Chief
Brenda	Clark	D	Morris Church	Chief
Joyce	Adams	D	Morris Church	Election Officer
Wanda	Lee-Ballou	D	Morris Church	Election Officer
Jacqueline (Jackie)	Morton	D	Morris Church	Election Officer
Piperlynn	Cheatham	N	Morris Church	Election Officer
Sophie	McGann	N	Morris Church	Election Officer



Donna	Stewart	N	New London	Assistant Chief
Michael	Wise	N	New London	Chief
Jacqueline	Mendez	N	New London	Election Officer



Alyssa	Wise	N	New London	Election Officer
Samuel	Wood	N	New London	Election Officer
Ross	Ellis	R	New London	Election Officer
James	Fowler	R	New London	Election Officer
David	Groves	R	New London	Election Officer
Albert	Wilson	R	New London	Election Officer
Florence	Burnette	N	Otter River	Assistant Chief
Peronneau (Robbie)	Robertson	R	Otter River	Chief
Sandra	Bale	N	Otter River	Election Officer
Cindy	Faulkner	N	Otter River	Election Officer
Phyllis	Clary	R	Otter River	Election Officer
Kimberly	Cox	R	Otter River	Election Officer
Judy	Eades	R	Otter River	Election Officer
Matthew	Gaston	R	Otter River	Election Officer
Richard	Grabowski	R	Otter River	Election Officer
Glenda	Blanks	N	Spring Hill	Assistant Chief
Kathryn	Sweatman	R	Spring Hill	Chief
Linda	Hall	R	Spring Hill	Election Officer
Kimberly	Keller	R	Spring Hill	Election Officer
Ashby	McCray	R	Spring Hill	Election Officer
Eileen	Miller	R	Spring Hill	Election Officer
Tamara	Nuckols	R	Spring Hill	Election Officer
Deanna	Pate	R	Spring Hill	Election Officer
John	Roark	R	Spring Hill	Election Officer
Christine	Sheridan	R	Three Forks	Assistant Chief
Salinda	Ponce	N	Three Forks	Chief
Gloria	Tune	D	Three Forks	Election Officer
James	Berrigan	N	Three Forks	Election Officer
Brenda	Bryant	N	Three Forks	Election Officer
Bernadette	Jones	N	Three Forks	Election Officer
Katherine	Paine	N	Three Forks	Election Officer
Dawn	Berrigan	R	Three Forks	Election Officer
Harold	Glass	R	Three Forks	Election Officer
Brian	Haaff	R	Three Forks	Election Officer
Teresa	Billingsley	N	Walker	Assistant Chief
Elisah	McGee	R	Walker	Chief
Melvin	Graves	D	Walker	Election Officer
James	Brizard	N	Walker	Election Officer
Juliana	Lucas	N	Walker	Election Officer
Danny	Rogers	R	Walker	Election Officer
Matthew	Snyder	R	Walker	Election Officer
Robert	Thompson	R	Walker	Election Officer
Charlie	Watts	R	Yellow Branch	Assistant Chief
Timothy	Robertson	N	Yellow Branch	Chief
Claude	Dixon	N	Yellow Branch	Election Officer
Melissa	Robertson	N	Yellow Branch	Election Officer
Patricia	Tracey	N	Yellow Branch	Election Officer
Veronica	Hall	R	Yellow Branch	Election Officer



David

Holder

R

Yellow Branch

Election Officer



## **EXHIBIT B**



VIRGINIA: IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY

REPUBLICAN PARTY OF VIRGINIA,

and

PRINCE WILLIAM COUNTY REPUBLICAN COMMITTEE,

Plaintiffs,

v.

CL. 22008769-00

PRINCE WILLIAM COUNTY ELECTORAL BOARD,

and

ERIC OLSEN, in his official capacity as General

Registrar for Prince William County,

Defendants

**Order**

This case came before the Court on the motion of the Plaintiffs for the entry of an order temporarily enjoining the Defendants from proceeding with the appointment of chief and/or assistant chief election officers in certain precincts located in Prince William County, pending the appointment of individuals nominated by the Plaintiffs as Republican representatives. Those precincts identified by the Plaintiffs are nos. 102, 210, 310, 315, 404, ~~414~~, 505, 511, 602, 613, ~~615~~, 616, 707, and 712.

They also seek to enjoin the Defendants from proceeding with the appointment of designated chief or assistant chief election officers in other precincts pending the appointment of individuals nominated by the Plaintiffs as Republican representatives. Those precincts identified by the Plaintiffs, and office for which an injunction is sought

are nos. 108 [assistant chief], 303 [chief], 507 [assistant chief], 516 [chief], 604 [assistant chief], 614 [chief], 706 [assistant chief], and 709 [chief]. Lastly, Plaintiffs seek to enjoin Defendants from proceeding with the appointment of those chief and assistant chief election officers pending the appointment of individuals nominated by the Plaintiffs as Republican representatives. Those precincts identified by the Plaintiffs and the office for which an injunction is sought are the following: 103 [assistant chief], 112 [assistant chief], 206 [assistant chief], 215 [assistant chief], 301 [assistant chief], 307 [assistant chief], 316 [assistant chief], 412 [assistant chief], 509 [assistant chief], 609 [assistant chief], ~~701~~ [assistant chief], 704 [assistant chief] and 711 [assistant chief].

Plaintiffs assert that the Defendant's failure to appoint election officials nominated by them, and the appointment of individuals either self-designated or designated as Republicans by the Defendant General Registrar of Defendant Electoral Board, is violative of Article 11 Section 8 of the Constitution of Virginia and Va. Code Ann. § 24.2-115.

Were it to grant the relief sought in the instant motion for temporary injunctive relief, the Court must be satisfied of the Plaintiff's equity. § 8.01-628, Va. Code Ann. To aid the Court in this determination the Federal Courts have identified factors to be considered in granting such relief. *Real Truth About Obama, Inc. v. FEC*, 575 F.3d 342 (4th Cir. 2009); *Winter v. NRDC, Inc.*, 129 S. Ct. 365 (2008). A consideration of those factors supports the relief sought by the Plaintiffs.

In considering the relevant factors articulated by the 4th Circuit, the Plaintiff must satisfy each of the factors to be entitled to relief. Based upon the Verified Complaint, papers filed, and arguments thereupon, the Court finds that the Plaintiffs have standing to proceed and that they have clearly shown that they are likely to succeed on the merits of case, are likely to suffer irreparable harm absent relief being accorded them by this Court, that the balance of equities tips in their favor, and that the relief sought is in the public interest. Training prescribed by Statute may still take place. Va. Code Ann. § 24.2-115. ["The electoral board shall ensure that each chief officer and assistant is instructed in his duties no less than three days nor more than 30 days prior to the election."].

The Court is persuaded by the arguments made by the Plaintiffs that they have satisfied the requisite showing as to the factors to be considered when determine the

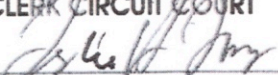


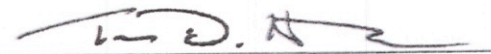
equities of the parties and that they are entitled to temporary injunctive in this case. The General Assembly has identified the manner of selection of the officers of election. That selection method is predicated upon the participation of political parties in the process. The evidence does not support the conclusion that, were the Court to grant the relief sought, the dictates of the statute and training of officials cannot be effectuated. The integrity of the election process requires that the public policy of the Commonwealth enunciated by the General Assembly. If it to be otherwise, the Plaintiffs will suffer irreparable harm.

Accordingly, the Court will grant the temporary injunctive relief sought. Bond will be set at \$1,000.00. The injunction shall be reviewed at a time convenient to the parties but no longer than 30 days from this date.

Entered this 2<sup>nd</sup> day of November 2022

A COPY TESTE:  
PRINCE WILLIAM COUNTY  
CLERK CIRCUIT COURT

BY:   
DEPUTY CLERK



Judge

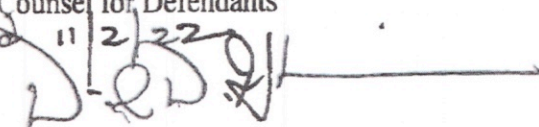
Seen:



Counsel for Plaintiffs

Seen: Objected to for the  
REASONS STATED in the  
PLEADINGS and in ARGUMENT  
BEFORE THE COURT on Nov 14/22

Counsel for Defendants

and 11/2/22  


# EXHIBIT C

**REPUBLICAN**  
\*\*\*  
NATIONAL COMMITTEE

Campbell County Electoral Board  
41 Courthouse Lane  
PO Box 103  
Rustburg VA 24588

Via E-mail

July 17, 2025

Dear Chairwoman Raner, Vice Chairman Woolridge, and Secretary Millson-Martula,

Thank you for your continuing work to ensure a fair, honest, and open election conducted in accord with Virginia law on November 4.

We write regarding a particular provision of law regarding the assignment of chief and assistant chief officers of election to the precincts. As you know, § 24.2-115(C) requires that the chief and assistant chief represent different political parties whenever practicable, and that an officer who does not represent a party only be assigned where no officer representing a party is available. In the latter case, there is also a requirement that you provide notice to both parties ten days prior to the election so that they may have time to make additional nominations.

In the list of officers provided to the Campbell County Republican Committee for the November 5, 2024 election, it appears that the Board may not have complied with these requirements. We write today in hope that you will have sufficient time to revise your assignment process in advance of this year's election to ensure compliance with this important statute.

According to the list provided for the 2024 election, the following precincts listed a chief and an assistant chief that do not meet the statutory requirements—

- Altavista—Unaffiliated chief and Democratic assistant chief
- Bedford Springs—Unaffiliated chief, no assistant chief listed
- Brookneal—Republican chief and Republican assistant chief
- Brookville—Unaffiliated chief and Republican assistant chief
- Concord—Republican chief and unaffiliated assistant chief
- Courthouse—Democratic chief and unaffiliated assistant chief
- Gladys—Democratic chief and unaffiliated assistant chief
- Kings—Democratic chief and unaffiliated assistant chief
- Morris Church—Democratic chief and unaffiliated assistant chief
- New London—Unaffiliated chief and unaffiliated assistant chief
- Otter River—Republican chief and Republican assistant chief
- Spring Hill—Unaffiliated chief and unaffiliated assistant chief
- Three Forks—Unaffiliated chief and Republican assistant chief
- Walker—Republican chief and Unaffiliated assistant chief
- Yellow Branch—Unaffiliated chief and Republican assistant chief

With respect to unaffiliated officers who were assigned, we are not aware of any notice provided to the Campbell County Republican Committee ten days prior to the election.

We note that there were 61 officers of election representing the Republican Party who were assigned for the last election. With 17 precincts, there can be no argument that officers representing the Republican Party are “available” and that it is “practicable” to appoint them as chief and assistant chief officers. Two legal resources provide guidance on these factors. An Attorney General opinion provides a precise working definition of the phrase “whenever practicable” as “where it is feasible to do so.” Op Va. Att’y Gen. 23-031 (Oct. 2, 2023). In a recent decision, the Prince William County Circuit Court found that it was feasible to finally appoint opposite party chiefs and assistants chiefs just seven days prior to election day. *Republican Party of Virginia v. Prince William County Electoral Board*, Va.Cir. Ct. Prince William Co. CL 22-008769 Order (Nov. 2, 2022).

Officers representing the Republican Party are available to serve as chiefs and assistant chiefs and it is practicable to appoint them so that all precincts can meet the requirements of the Code.

I look forward to chief and assistant chief assignments that comply with the law for the November 4, 2025, general election. If I may be of any assistance, please don’t hesitate to contact me.

Sincerely,

/s/ Chris Marston

Chris Marston  
General Counsel  
Republican Party of Virginia

/s/ Mandy Lester

Mandy Lester  
Chief Counsel  
Republican National Committee



# EXHIBIT D

# Campbell County

Virginia

**County Attorney**

F.E. "Tripp" Isenhour, III  
2306 Atherholt Rd.  
Lynchburg, Virginia 24501  
feisenhour@co.campbell.va.us  
Phone: 434-846-2731  
Fax: 434-846-0496

July 29, 2025

Chris Marston, Esquire  
General Counsel, Republican Party of Va.  
PO Box 26141  
Alexandria, VA 22313  
(and by email to [chris@virginia.gop](mailto:chris@virginia.gop))

Mandy Lester, Esquire  
Chief Counsel, Republican National Committee  
310 First Street, SE  
Washington, DC 20003

**Re: Your Correspondence dated July 17, 2025 concerning  
Party Parity Amongst Precinct Chiefs and Asst. Chiefs in Campbell County**

Fellow Counsel,

As you may know, the undersigned is the County Attorney for Campbell County, Virginia. The Electoral Board and the Registrar for Campbell County recently received your July 17, 2025 letter concerning party parity amongst precinct chiefs and assistant precinct chiefs in Campbell County, Virginia. Thank you for your interest in and attention to this matter.

I write in reply to supply information helpful for your respective offices related to the content of your letter, as well as to additionally provide context which I hope allays any concerns related to the process of selecting precinct workers in Campbell County. First, you had mentioned in your letter that you were not aware of any notice provided to the Campbell County Republican Committee prior to the November 5, 2024 election. You should be pleased to hear that not only was an official notice of the party affiliation of precinct workers in Campbell County sent ten days prior to the election as required by Va. Code § 24.2-115(C) (Exhibit A), but that in addition to the legally required letter the Registrar additionally provided "FYI" notices of the preliminary scheduled precinct worker assignments on October 3, 2024 and October 10, 2024 (Exhibits B and C). In the spirit of positive cooperation for the purpose of open, free, and fair elections, it should reassure you to know that not only was the legal requirement met, but that the Registrar went above and beyond to ensure that the parties had every opportunity to provide additional names of precinct workers if the parties so chose.

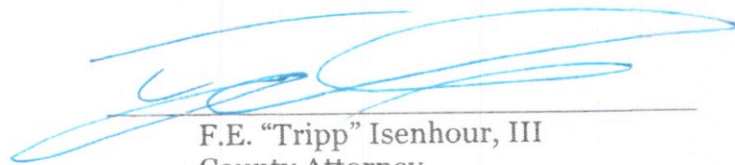


Letter to Martson and Lester  
July 29, 2025  
Page 2 of 2

Further, and as I am certain you are aware, locating the necessary number of volunteers willing to serve the important role of election precinct workers is a challenge in any locality. For rural localities that challenge is exacerbated. It appears that the repeated language of "if practicable" contained in Va. Code § 24.2-115 is the General Assembly's recognition of this inescapable fact. Likewise the Attorney General's opinion of October 2, 2023 cited in your letter uses the term "feasible" correspondingly with the term "practicable", both with the seeming connotation that while good faith best efforts are required, ultimate results are often outside the control of the responsible staff, particularly in more rural locations.

With that said, in order to make an additional good faith attempt to achieve as much parity as is practicable or feasible under local circumstances, the Registrar sent out the correspondence attached hereto as Exhibit D to all election precinct workers on July 21, 2025. As you can see, the letter requests that those who are willing to designate their party should do so, and specifically requests individuals designate their willingness to serve in the leadership role of chief or assistance chief. Prior informal attempts by the Registrar to prompt individuals to designate party identification have not meaningfully increased the number of individual precinct workers willing to designate their party. Further, informal surveys sent in previous years (by internet poll) have determined that the majority of individuals do not want to serve in leadership, although all prior surveys have been anonymous. The intention of the most recent letter is to formalize and document what has been conducted informally previously—to seek to have as many individuals as are willing designate their party, and to have as many of those who have designated and as are willing serve as chief or assistant chief. Responses to the request have not been received as of the date of this letter, but it is my hope that the additional effort of specific direct communication to each individual precinct worker requesting individual and specific responses will make this year's election more compliant with the goals and direction of Va. Code § 24.2-115. Unless you request additional information sent to your offices as follow up, the Registrar will forward to the local parties the updated lists as required by Code at such time is required, which we can all hope to have increased party parity pursuant as a result of the Registrar's additional and renewed efforts towards that end.

Thank you for your time and attention to this matter. Please feel free to contact me with any questions you may have.



F.E. "Tripp" Isenhour, III  
County Attorney

Enclosures as noted  
cc: Electoral Board  
Frank J. Rogers, IV, County Administrator  
Kelly Martin, Registrar

**REPUBLICAN**  
\*\*\*  
NATIONAL COMMITTEE

Campbell County Electoral Board  
41 Courthouse Lane  
PO Box 103  
Rustburg VA 24588

Via E-mail

October 21, 2025

Dear Chairwoman Raner, Vice Chairman Woolridge, and Secretary Millson-Martula,

We write to follow up on our letter of July 17 in light of additional information.

First, thank you for the information provided by Mr. Isenhour, the county attorney. We found it very helpful.

Second, we noted that in the tentative assignments reviewed at the October 7, 2025, meeting of your Board, you had not yet assigned chief and assistant chief officers of opposite parties in several precincts:

- Bedford Springs—Unaffiliated chief, no assistant chief
- Brookville—Republican chief, unaffiliated assistant chief
- Central Absentee Precinct—No chief, Republican assistant chief
- Concord—Republican chief, unaffiliated assistant chief
- Gladys—Democratic chief, unaffiliated assistant chief
- Kings—Democratic chief, no assistant chief
- New London—unaffiliated chief, unaffiliated assistant chief
- Otter River—Republican chief, unaffiliated assistant chief
- Spring Hill—Republican chief, unaffiliated assistant chief
- Three Forks—Unaffiliated chief, Republican assistant chief
- Walker—Republican chief, unaffiliated assistant chief
- Yellow Branch—Unaffiliated Chief, Republican assistant chief

We also noted that the distribution of Republican officers of election across precincts was very uneven. For example, Gladys precinct has 1 Republican, 4 Democrats, and 6 unaffiliated, whereas Spring Hill has 8 Republicans and 1 unaffiliated. Courthouse, on the other hand, is a model precinct with 5 Republicans, 4 Democrats, and 3 unaffiliated.

We look forward to an update on your work since October 7 in complying with 24.2-115(C). The sooner we receive an update, the more likely it will be that we can avoid legal action to enforce the requirements of Virginia law.

Thank you for your prompt attention to these concerns. Please feel free to contact Chris at [chris@virginia.gov](mailto:chris@virginia.gov) or 571-482-7690 if you would like to discuss this matter.

Sincerely,

/s/ Chris Marston

Chris Marston  
General Counsel  
Republican Party of Virginia

/s/ Mandy Lester

Mandy Lester  
Chief Counsel  
Republican National Committee

# EXHIBIT E



# COUNTY OF CAMPBELL



## ELECTORAL BOARD MEMBERS

DON WOOLDRIDGE  
DEBBIE RANER  
CHRIS MILLSON-MARTULA

## DIRECTOR OF ELECTIONS/REGISTRAR

KELLY L MARTIN

BROOKNEAL (434) 283-9579  
LYNCHBURG (434) 592-9579  
RUSTBURG (434) 332-9579  
FAX (434) 332-9689

## DEPARTMENT OF ELECTIONS

41 COURTHOUSE LANE  
POST OFFICE BOX 103  
RUSTBURG, VIRGINIA 24588  
[www.co.campbell.va.us](http://www.co.campbell.va.us)

October 24, 2024

Katherine Decker  
Republican Party Chairman  
PO Box 1213  
Rustburg, VA 24588

Dear Chairman Decker:

In compliance with §24.2-115 of the Code of Virginia, members of the Campbell County Electoral Board and the General Registrar are providing notice to the Republican Party of Campbell County, VA that we intend to use nonaffiliated election officers in the upcoming November General and Special Election. If you wish to provide a list of Republican nominations to serve as election officials you must do so in writing 5 days from the date of this letter.

Sincerely,

Kelly L. Martin  
Director of Elections/General Registrar

cc: Campbell County EB  
Enclosure

RESPECTING THE PAST, ATTENDING THE PRESENT, CONCENTRATING ON THE FUTURE

