

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

COUNTY OF WAKE

NORTH CAROLINA REPUBLICAN PARTY, )  
THE JEFFERSON GRIFFIN COMMITTEE, )  
and JEFFERSON GRIFFIN )

Plaintiffs, )

v. )

NORTH CAROLINA STATE BOARD OF )  
ELECTIONS; ALAN HIRSCH, in his official )  
capacity as Chair of the State Board of Elections; )  
JEFF CARMON, in his official capacity; )  
STACY EGGERS IV, in his official capacity; )  
KEVIN N. LEWIS, in his official capacity; )  
SIOBHAN O'DUFFY MILLEN, in her official )  
capacity; and KAREN BRINSON BELL, in her )  
official capacity as Executive Director of the )  
State Board of Elections, )

Defendants. )

**VERIFIED COMPLAINT**

**INTRODUCTION**

NOW COMES, Plaintiffs the North Carolina Republican Party (“NCGOP”), The Jefferson Griffin Committee, a North Carolina unincorporated state campaign committee, and Jefferson Griffin, candidate for Associate Justice on the North Carolina Supreme Court, Seat 06

(collectively “Plaintiffs”), hereby seek enforcement of the right to inspect public records pursuant to North Carolina’s Public Records Law, N.C.G.S. § 132 *et seq.* In support thereof, Plaintiffs hereby state as follows:

**PARTIES**

1. Plaintiff NCGOP is a North Carolina state political party organization recognized under state and federal law. *See* 11 C.F.R. 100.15; N.C.G.S. § 163-96.

2. Plaintiff The Jefferson Griffin Committee is a North Carolina state campaign committee as defined under state law. *See* N.C.G.S. § 163-278.6(74)(a).

3. Plaintiff Jefferson Griffin is the authorizing candidate of The Jefferson Griffin Committee, seeking election as Associate Justice on the North Carolina Supreme Court, Seat 06. *See* N.C.G.S. § 163-96.

4. Defendant North Carolina State Board of Elections is the state agency responsible for overseeing and managing many of the election processes in North Carolina, including the collection of data related to North Carolina elections and the issuance of guidance and information to the county boards of elections throughout the state. Defendant is also the legal custodian of the public records at issue in this action.

5. Defendant Alan Hirsch is the Chair of the North Carolina State Board of Elections. Mr. Hirsch is sued in his official capacity.

6. Defendant Jeff Carmon is the Secretary of the North Carolina State Board of Elections. He is sued in his official capacity.

7. Defendant Stacy “Four” Eggers IV is a Member of the North Carolina State Board of Elections. He is sued in his official capacity.

8. Defendant Kevin N. Lewis is a Member of the North Carolina State Board of Elections. He is sued in his official capacity.









































