



MONTGOMERY COUNTY REPUBLICAN PARTY OF TEXAS

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Petition for Writ of Mandamus Filed Against Montgomery County Republican Party Chairman Bryan Christ

MONTGOMERY COUNTY, TX - After months of attempting reconciliation, a [Petition for Writ of Mandamus](#) was filed on Feb. 14, 2023, with the Supreme Court of Texas against Party Chairman Bryan Christ for failing to report properly elected precinct chairs to the Secretary of State as required by law. More than 60 people have signed onto the lawsuit thus far, including 58 Montgomery County Republican Party precinct chairs and three party officers.

The action was taken on private recommendation from individual members of Republican Party of Texas (RPT) leadership and members of the RPT Officials Committee, and was initiated by a member of the Officials Committee after a failed mediation attempt led by RPT Chairman Matt Rinaldi and delayed response to complaints made with the Texas Secretary of State.

At last count there were 11 complaints submitted to the Secretary of State against Chairman Christ for various violations of the Texas Election Code and the Texas Penal Code.

A remedy must be found before the May 6 Joint Election so that elections may be conducted in Montgomery County precincts where Chairman Christ has reported improperly elected precinct chairs to the Secretary of State.

The petition was filed by Attorney Warren Norred, who was recommended by a member of RPT leadership. "Chairman Bryan Christ has caused and created division, acrimony, and irreparable harm to the Montgomery County Republican Party name by effectively dividing the party into two entities," said Norred.

The majority group of precinct chairs petitioning for the writ represent everyday citizens on the front lines of elections in Montgomery County, putting out yard signs, making phone calls, and educating their neighbors. They are standing up for election integrity, which extends all the way down to the appointment of individuals who fill precinct chair vacancies. When one elected person can violate the law at will, we no longer have an election system.

Click [here](#) to view supporting documents on Attorney Warren Norred's website.

Details of the Complaint

[Section 171.024\(e\)](#) of the Texas Election Code requires chairs of county parties to submit a list of newly appointed precinct chairs from their respective counties to the Texas Secretary of State, a ministerial act enforceable by mandamus in the courts of appeal, including the Supreme Court of Texas, under sections [161.007](#), [161.009](#), and [273.081](#) of the Texas Election Code.

Following a July 19, 2022, required Organizational Meeting of the County Executive Committee that Chairman Christ improperly adjourned, Chairman Christ repeatedly abandoned his duty to preside over properly called meetings and ignored the precinct chair appointments and other decisions made during those meetings.

Instead, he chose to preside over improperly called meetings with a minority group of precinct chairs who support him, violating rule after rule in an attempt to claim a majority in the party. Since Chairman Christ was never able to establish a quorum at any of these illegitimate meetings, he then started recruiting people, telling them they were now precinct chairs for precincts that were not vacant. He then conducted precinct chair elections with his minority group and illegally reported those individuals to the Secretary of State. Afterwards, he declared that he now had a quorum to appoint his own party officers, who were guaranteed to support and agree with him on party issues.

Chairman Christ has done all he can to thwart the will of the majority of the party, including claiming that he has the power to “nullify” the vote of the County Executive Committee. His rulings regarding these meetings, and his assertions of invalidity of majority-elected precinct chairs, have resulted in bifurcation of the county party, preventing the County Executive Committee from functioning properly. He is misrepresenting the county's precinct chairs to candidates and vendors who rely on correct information to conduct elections. He has violated party rules, state laws, and divided the party through what the Republican Party of Texas Mediation team called a “total failure of leadership” (see below).

"Chairman Christ believes that he can operate the County Executive Committee like a private fiefdom and ignore two-thirds or more of the precinct chairs in the county who may not align exactly with his approach," continued Norred.

Mediation Attempt

In an effort at reconciliation, the precinct chair majority group reached out to the State Republican Executive Committee for guidance. RPT Chairman Matt Rinaldi and Officials Committee Member Matt Patrick conducted a mediation between Chairman Christ's group and the precinct chair majority group on Sept. 30, 2022. The mediation effort was unsuccessful.

Patrick wrote an [official summary](#) of the failed mediation on Nov. 18, 2022, for the Officials Committee. The summary was originally confidential, but has since been released and is included in a declaration from Patrick in the Petition for Writ of Mandamus.

"Ultimately the rift is, in my assessment, a result of a complete failure of leadership by Chair Christ," Patrick said in the official summary. "CECs [County Executive Committees] across the state frequently have factions and/or disputes, and it is the chair's job to find a path through those disputes that works for both sides. Mr. Christ not only failed in this principal duty but seemed uninterested in solving the problem."

Chairman Christ was unwilling to agree to mediation requests that he (1) chair County Executive Committee meetings according to the rules set by the Republican Party of Texas and the [bylaws of the county party](#) and (2) respect the majority vote of the County Executive Committee members.

Notably, Chairman Rinaldi offered to chair the Oct. 17, 2022, County Executive Committee meeting to ensure that it was conducted impartially, but this was refused by Chairman Christ.

In the summary, Patrick said that the precinct chair majority group's primary goal of mediation was to "have a single meeting with all precinct chairs present. They repeatedly expressed willingness to just follow the bylaws, or make concessions [and] if necessary to have a third party led organizational meeting to bring the sides together."

Click [here](#) to read the full Mediation Summary.

Special Meeting Called to Settle Disputes Within the Party

In Dec. 2022, the precinct chair majority group called a Special Meeting to address disputed issues, and again asked Chairman Christ to preside. This meeting was particularly important to settle concerns internally and bring the party together. It was the first properly called meeting attended by Chairman Christ since July 2022.

The County Executive Committee had adopted a [resolution](#) on Sept. 6, 2022, to compel Chairman Christ to fulfill his duties as County Chairman of the Montgomery County Republican Party. Along with the requirement to preside over properly called meetings, the resolution demanded that he file newly elected precinct chairs with the Secretary of State as required in [Texas Election Code 171.024 \(e\)](#) and [172.118](#). The resolution was forwarded to the Republican Party of Texas Officials Committee.

Chairman Christ's attendance at the Dec. 6 meeting looked like a step in the right direction. Attendees were hopeful that reconciliation could be achieved through a properly conducted meeting, but right away it became clear that Chairman Christ was not focused on reconciliation or compromise. Chairman Christ brought his attorney to the meeting and has insinuated on more than one occasion that if overruled by the County Executive Committee, there could be legal action.

Chairman Christ immediately began creating chaos by refusing to recognize the duly elected Party Secretary so that roll call could be conducted. When he realized that not enough of his supporters were in attendance to give him the votes he needed, even though he claimed, and continues to falsely claim, that he controls a majority of the party, the Chairman declared the meeting "at ease" to stop any business from being conducted. This attempt was objected to by more than five County Executive Committee members. When the Chairman refused to move the meeting forward, the body voted to remove him as chair of the Dec. 6 meeting, citing Robert's Rules of Order (RONR 62:10), so that the agenda could be completed.

Ultimately, the meeting resulted in a [resolution to censure](#) the Chairman for failing to fulfill his duties as county chairman and refusal to fulfill his statutory duties to report all duly elected precinct chairs to the Secretary of State.

After the meeting was adjourned, Christ subsequently claimed that none of the business conducted was valid because he had put the meeting "at ease." Robert's Rules is clear that a meeting cannot be put "at ease" if there are objections from the body.

Guidance From the State Republican Executive Committee

The County Executive Committee next set their hopes for resolution on the Dec. 10, 2022, meeting of the State Republican Executive Committee (SREC). The SREC had received more than 100 pages of documentation along with a debrief of the mediation session from Chairman Rinaldi. The County Executive Committee asked the SREC to recommend that Chairman Christ submit all properly elected precinct chairs to the Secretary of State's office and follow all party rules, bylaws, and Texas Election Code.

The SREC debated the issue, but determined that it was best for the county to settle its differences in house. They passed a resolution "encouraging amity in the Montgomery County Republican Party" and requesting that "all county executive committees follow the Texas Election Code, Republican Party of Texas Rules, and the bylaws of each executive committee to govern its conduct."

Rather than abiding by the SREC's resolution "encouraging amity in the Montgomery County Republican Party," Chairman Christ's group sent out a Jan. 17, 2023, press release accusing the precinct chair majority group of multiple false accusations including conspiring to take over the party's bank account, improper usage of the party's email list, and sowing discord in the party.

In that press release, Chairman Christ and his group also defamed the Vice Chairman, Treasurer, and the Assistant Treasurer of the party by falsely accusing them of Fraud, Conspiracy to Commit Fraud, and

Embezzlement, and then insinuated that law enforcement would be taking action. Chairman Christ has been notified that he must print a retraction for those false accusations or he may be sued for defamation.

They also blatantly misrepresented the mediation process, claiming that the precinct chair majority group "rebuffed" attempts at mediation, when in reality, the Mediation Summary memo states that "Mr. Christ attempted to avoid the meeting and his involvement in the dispute, but the RPT Chair insisted he attend."

Their press release further states that the precinct chair majority group insisted "that the County Chairman must first resign before they would agree to anything - all of this in writing." The Mediation Summary memo clearly shows that this is false.

The actual process and results of mediation may be read in the official [Mediation Summary](#) memo.

Also in January, Chairman Christ endorsed an improperly elected "ethics committee" chairman to hold inquisitorial meetings, in which one of his lieutenants would send an email to a properly elected precinct chair threatening loss of office if the chair didn't appear before the "ethics committee," a committee not recognized in the party's bylaws.

Why It Matters

The Montgomery County Republican Party is meant to represent conservative voters, yet Chairman Christ seems more interested in protecting his wife's political consulting firm, Southern Heritage Political Consulting, and political action committee, the Republican Voters of Texas PAC (RVT).

Since the RVT's creation in 2018, they have sent deceptive mailers to voters and showed up at the polls impersonating the Montgomery County Republican Party to mislead voters into thinking that they are voting for candidates endorsed by the local Republican Party. Some of the same people involved in the RVT, including Chairman Christ and his wife, also used this tactic in 2014 when they formed a fake Tea Party to deceive voters into electing their candidates.

In 2018, the Montgomery County Republican Party condemned the RVT for deceptive electioneering, yet they continued with their unethical election practices. Chairman Christ and his minority faction of the local party recently passed a resolution apologizing to his wife's PAC, the Republican Voters of Texas PAC, for the 2018 resolution condemning their deceptive election practices.

While members of the RVT continue to claim that they only endorse conservative Republican candidates, this is simply not true. For example, one of the RVT founders openly endorsed Claire Lindsay (Democrat) when she ran against Matt Beasley (Republican) for Justice of the Peace. She even had a fundraiser for Lindsay at her home. In the most recent primary, the RVT targeted Representative Steve Toth (HD 15), who consistently has one of the most conservative voting records in the State House.

Chairman Christ has also formed the Montgomery County Republican Club PAC, the MCTX Republican Victory PAC, and registered his own Treasurer with the Texas Ethics Commission since he refuses to recognize the Treasurer that was elected by the majority of the County Executive Committee.

These actions do not bode well for conservative Republicans in upcoming Montgomery County primaries. While many people say the County Executive Committee should stand down because "Chairman Christ was elected by Montgomery County voters," they forget that the precinct chairs also were elected to represent Montgomery County voters and they make up the body of the County Executive Committee.

The Chairman's role is to facilitate County Executive Committee meetings, not rule over them. Precinct chairs have a responsibility to ensure that decisions made within their meetings are in the best interests of Montgomery County Republicans.

Moving Forward

The [Petition for Writ of Mandamus](#) asks for properly elected precinct chairs to be reported to the Secretary of State and for Chairman Christ to refrain from submitting any name to the Texas Secretary of State who has obtained his or her position by vote at a meeting of less than one-third quorum.

In addition, the petition asks the Supreme Court to direct Chairman Christ not to interfere with the properly elected party Treasurer as he files required financial reports with the Texas Ethics Commission.

The Texas Supreme Court is busy. The Court may take the case, refer it to district court, require the Secretary of State to make a ruling on disputed precinct chairs, or send it back to the Republican Party of Texas for resolution according to party bylaws and Texas Election Code.

However they choose to rule, a remedy will be needed before the upcoming May 6 Joint Election so that elections may be conducted in Montgomery County precincts where Chairman Christ has reported improperly elected precinct chairs to the Secretary of State.

While the County Executive Committee would prefer for the Chairman to preside over properly called meetings, he must abide by the party bylaws, Robert's Rules of Order, and Texas Election Code when doing so for the meetings to be valid. He cannot twist the rules according to his own narrative in order to create a false majority against the wishes of properly elected precinct chairs.

The majority of the Montgomery County Republican Party is taking a principled stand against Chairman Christ and his unethical behavior. Although the precinct chair majority group did not want to file litigation, Chairman Christ and his attorney seem to have calculated that the Republican Party of Texas would not take action to enforce their own rules if there was a chance that they could be enjoined in a lawsuit for doing so, leaving it up to the precinct chair majority group to take action.

The treatment of political parties within the Texas Election Code and within the court system must be hashed out so that the Republican Party of Texas will be able to address rogue chairmen, such as Bryan Christ, who are abusing the Republican brand, without having to worry about costly, time-consuming litigation.

Across the state, more than 40 counties currently are experiencing similar disputes within the local Republican Party as new grassroots precinct chairs seek to compel county chairs to follow the bylaws of the party. As long as corrupt politicians and political consulting organizations are able to continue to buy party chairmanships and then have Democrats cross over to vote for their candidates in Texas' open primaries, the Republican Party will continue to struggle and be divided.

Everyday Americans are being forced to choose between standing up for the rules or looking the other way in the name of "unity." Their response will determine whether America will be saved, one county at a time.

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★ Montgomery County Republican Party of Texas

The Montgomery County Republican Party of Texas is committed to honoring God by exhibiting the highest levels of honesty, integrity, and accountability. It is our goal to inform and engage the voting public. We support conservative Republicans to allow Montgomery County to be a safeguard for preserving the Constitutional principles and values upon which our great country and state were founded.