

FILED

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE  
TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

RICHARD R. ROOKER, CLERK

JAMES GIBBS

Plaintiff

v.

CANNON COUNTY REPUBLICAN  
PARTY, COREY DAVENPORT,  
DANA DAVENPORT, BONNIE  
THOMAS, JOHN WILKINSON,  
RANDALL REID, AND JENNIFER  
WINFREE individually and collectively  
d/b/a CANNON COUNTY  
REPUBLICAN PARTY EXECUTIVE  
COMMITTEE

Defendants

*[Handwritten Signature]*

"JURY DEMAND"

No. 16C289

COMPLAINT

COMES NOW Plaintiff James Gibbs ("Gibbs") Pro Se and hereby files his Complaint against Defendants Corey Davenport, Dana Davenport, Bonnie Thomas, John Wilkinson, Randall Reid, Jennifer Winfree individually and collectively d/b/a/ the Cannon County Republican Party Executive Committee representing the Cannon County Republican Party under the authority of the Tennessee Republican Party complaining of the Defendants' malicious and intentional conduct and asserting claims against them for slander, libel and false light invasion of privacy states as follows:

PARTIES

1. Plaintiff is an adult resident of the State of Tennessee.
2. Plaintiff is a licensed real estate broker, licensed security trainer, licensed professional investigator and a notary public in the State of Tennessee for which a good reputation is an invaluable commodity. Plaintiff has enjoyed a good reputation and has been

elevated to the positions of Vice Commander of the American Legion, Secretary of the Cannon County Regional Planning Commission and Chairman of the Cannon County Republican Party all positions of honor and prestige which Plaintiff values.

3. Upon information and belief, Defendant Corey Davenport and Defendant Dana Davenport are husband and wife and are adult residents of Cannon County, Tennessee and may be served at 182 New Street, Woodbury, TN 37190.

4. Upon information and belief, Defendant Bonnie Thomas is an adult resident of Cannon County, Tennessee and may be served at 3832 Murfreesboro Road, Readyville, TN 37149.

5. Upon information and belief, Defendant John Wilkinson is an adult resident of Cannon County, Tennessee and may be served at 198 Ray Hare Lane, Milton, TN 37118.

6. Upon information and belief, Defendant Randall Reid is an adult resident of Cannon County, Tennessee and may be served at 120 Peeler Hill Road, Woodbury, TN 37190.

7. Upon information and belief, Defendant Jennifer Winfree is an adult resident of DeKalb County, Tennessee and may be served at 186 Ashburn Circle, Lancaster, TN 38569.

8. Upon information and belief, the aforementioned Defendants paragraphs 3-7 are elected or appointed members of the Cannon County Republican Party Executive Committee representing the Cannon County Republican Party at all times mentioned in this complaint with the exception of Dana Davenport who served from February 9, 2015 until she resigned as treasurer in September or October of 2015.

9. The Defendant Cannon County Republican Party Executive Committee is an unincorporated local political organization created in Cannon County Tennessee under the rules and bylaws of the Republican Party of Tennessee and the rules and bylaws of the Republican National Committee and may be served in care of Chairman Corey Davenport at 182 New Street, Woodbury, TN 37190.

## **JURISDICTION AND VENUE**

10. This Court has jurisdiction to resolve the issues presented in this lawsuit pursuant Tenn. Code Ann. 16-11-102(a). Since the unliquidated damages for injuries to character arose in whole or in substantial part within the State of Tennessee and within Davidson County, Tennessee, venue is properly placed in this Court pursuant to Tenn. Code Ann. 20-4-101(a)

## **FACTUAL ALLEGATIONS**

11. On or about May 25, 2015 defendants published a series of false and declamatory statements casting false light on the Plaintiff good name and reputation. Addressed to "Everyone" on the Cannon County Republican Party Facebook page, which alleges in part that the Executive Committee of the Cannon County Republican Party as of April 15th, 2015, has formally begun an impeachment process of Chairman Jim Gibbs (Exhibit A)

12. The Facebook post referred to Plaintiff by name throughout, was made of and concerning Plaintiff, and was so understood by those who read the Cannon County Republican Party Facebook page willfully and maliciously casting the Plaintiff in false light by stating that the impeachment process was outlined within the State republican Party for due cause because of the Plaintiff's own action.

13. On July 9, 2015 Defendants C. Davenport, D. Davenport, Thomas, Wilkinson and Winfree (Defendants 3, 4, 5 and 7) secretly met and conspired to intentionally and maliciously draft and document listing false and defamatory statements pertaining to Jim Gibbs naming him by name and caused that document to be transmitted on July 10, 2015 via email to the Tennessee Republican Party in Nashville Tennessee for the specific purpose of defaming Plaintiff and casting his good character and casting Plaintiff in false light. (Exhibit B)

14. The aforementioned email letter falsely states that Mr. Gibbs began stating as early as March 2015 to members of the Executive Committee in a derogatory manner that he had manipulated the election for the office of Chairman during our February 2015 reorganization meeting to favor his election to the position of Chairman.

15. The aforementioned email letter falsely states that Mr. Gibbs stated to the Past Party Chairman Corey Davenport on April 1st, 2015 that “he beat us at our own game” in reference to his election as Chairman at the reorganization meeting in February 2015. Mr. Gibbs implied that he stacked the deck with people to ensure his election to the role of Chairman.

16. The aforementioned email letter placed Plaintiff in false light by stating that It has been determined that five persons who voted in the February 9th, 2015 reorganization meeting for Mr. Gibbs were not eligible to vote due to not meeting the requirements of eligibility per the Tennessee Republican Party By-Laws.

17. The aforementioned email letter placed Plaintiff in false light by stating Mr. Gibbs conducted an interview on Channel Four News in March 2015 in opposition to State Representative Judd Matheny’s (R) bill HB0934. Representative Matheny’s bill concerned exploding shooting targets called Tannerite. Mr. Gibbs was adamantly opposed to the bill and identified his title as Cannon County Republican Party Chairman during the interview and did so without the consent or knowledge of the Executive Committee.

18. The aforementioned email letter falsely states Mr. Gibbs ignored repeated requests by members of the Executive Committee to stop using the title “Cannon County Republican Party Chairman” when conducting media interviews on matters not directly related to the Cannon County Republican Party and or its members.

19. The aforementioned email letter falsely states Mr. Gibbs ignored repeated requests to stop using the Cannon County Republican Party name when expressing his own personal views on matters unrelated to the Cannon County Republican Party and or its members.

20. The aforementioned email letter placed Plaintiff in false light by stating Mr. Gibbs created the email address [gop@cannoncounty.net](mailto:gop@cannoncounty.net) without the consent or knowledge of the Executive Committee and maintains exclusive control of the email to send out content to members of the Cannon County Republican Party that is not being viewed or authorized by the Executive Committee prior to publication.

21. The aforementioned email letter placed Plaintiff in false light by stating that Mr. Gibbs wrote and submitted an article to the Cannon County Courier newspaper entitled “Republican Party Chairman Jim Gibbs Clarifies Election Commission Process” without the knowledge or consent of the Executive Committee.

22. The aforementioned email letter placed Plaintiff in false light by falsely stating that Mr. Gibbs remains obstinate that he is the “Chief Executive Officer of the Cannon County Republican Party and he will continue to do as he pleases and “if the people don’t like it then they can vote for someone else in two years”.

23. During an improperly called special meeting on September 8th, 2015, Defendants C. Davenport, D. Davenport, Thomas, Wilkinson, Reid and Winfree (Defendants 3 - 7) agreed to a letter directed toward Mr. Ryan Haynes, Chairman Tennessee Republican Party located at 2424 21st Ave. Suite 200 Nashville, TN 37212., (Exhibit C)

24. The aforementioned letter placed Plaintiff in false light by intentionally and maliciously listing false and defamatory statements pertaining to Plaintiff Gibbs naming him by name stating, "Despite repeated requests by the Executive Committee and by the State of Tennessee Republican Party, Mr. Gibbs is continuing to violate the by-laws and policies that have been approved by the T.R.P. He is in blatant disregard to repeated requests to comply with the approved individual policies of the C.C.R.P."

25. On or about September 22, 2015, Plaintiff discovered that Defendant Dana Davenport had been appointed as a judicial commissioner on or about February 2015 had been holding a position as an officer in the Republican Party in violation of the Tennessee Supreme Court Rule 10 Prohibiting judicial commissioners from holding an office in a political organization. (Exhibit D)

26. Plaintiff initially requested the resignation of Defendant Dana Davenport from the Cannon County Republican Party Executive Committee and subsequently filed a formal ethics complaint against Defendant Dana Davenport with the Tennessee Board of Judicial Conduct.

27. On October 18, 2015, Defendants C. Davenport, B. Thomas, R. Reid and J. Wilkinson secretly met as the Cannon County Republican Party Executive Committee and created a letter addressed To Whom It May Concern: which intentionally and maliciously cast Plaintiff in false light with the

explicit intent to discredit Plaintiff as a witness before the Tennessee Board of Judicial Conduct. (Exhibit E)

28. The aforementioned letter falsely states Mrs. Davenport's dual role within our organization and yours was a known fact from the very beginning of her appointment as a Judicial Commissioner by all members of the Executive Committee to include Mr. Gibbs casting the Plaintiff in false light.

29. The aforementioned letter placed Plaintiff in false light by stating that during the August 3rd, 2015 meeting of the Republican Party Mrs. Davenport was elected by unanimous consent to the office of Treasurer and there were no objections made to her election by any member of the committee to include Mr. Gibbs.

30. The aforementioned letter placed Plaintiff in false light by stating during a special called meeting on September 8th, 2015 Mr. Gibbs was removed from the meeting by a Deputy Sheriff. And falsely states Mrs. Davenport was not involved with any decision making process concerning Mr. Gibbs removal from the meeting in any shape or form nor did she have any conversation with the Deputy during the meeting. Mr. Gibbs actions alone were the determining factor that caused his removal from the meeting.

31. The aforementioned letter placed Plaintiff in false light by stating the Cannon County Sheriff's department and the District Attorney's Office had been previously consulted because of an ongoing issue of Mr. Gibbs and theft of Cannon County Republican Party property.

32. The aforementioned letter placed Plaintiff in false light by stating it had also become alarmingly clear that Mr. Gibbs increased hostility toward the board members could produce an explosive situation that might warrant the need for a member of law enforcement to be present. The CCRP Executive Committee will continue to request a Deputy Sheriff be present as long as Mr. Gibbs continues in his role as Chairman.

33. On December 5, 2015 Defendants C. Davenport, J Wilkinson and B Thomas appeared before a meeting of the Tennessee Republican Party Executive Committee at 2500 21st Avenue South, Suite 200 Nashville. The three Defendants appeared as representatives of the Cannon county Republican Party Executive Committee.

34. During the aforementioned meeting, Defendant Corey Davenport spoke to an audience of approximately eighty (80) people in which he specifically referred to Plaintiff by name throughout a five minute attack on Plaintiff's character and reputation during which time he intentionally and maliciously uttered false statements concerning Plaintiff and willfully and maliciously cast the Plaintiff in false light by stating of the Plaintiff that, "I have personally never met an individual more determined to cause turmoil."

35. During the aforementioned meeting, Defendant Corey Davenport also intentionally and maliciously uttered the following statements (paragraphs 34 - 49) of which Defendant C. Davenport new or should have know were completely false or misleading casting the Plaintiff in false light with the deliberate intention to discredit and embarrass the Plaintiff.

36. Defendant Corey Davenport falsely stated Mr. Gibbs has decided that he alone makes all the decisions on behalf of the Cannon County Republican Party.

37. Defendant Corey Davenport falsely stated, "Mr. Gibbs decided on his own accord that all policies presented to this board on July 24<sup>th</sup> and additional policies adopted by our executive committee at the August 3<sup>rd</sup> meeting are in his words "null and void" and unconstitutional and therefore he does not have to recognize or follow any of them."

38. Defendant Corey Davenport falsely stated, "In July Mr. Gibbs violated federal law by illegally closing our post office box that had been in service for 4 years."

39. Defendant Corey Davenport falsely stated, "Mr. Gibbs has refused to follow the bylaws approved by the SEC on July 25 by acknowledging our web master John Wilkinson."

40. Defendant Corey Davenport falsely stated and cast false light on Plaintiff by stating, "Since March of this year, Mr. Gibbs has held hostage and refused to turn over access to our website and email account paid for and belonging to the Republican Party besides being specifically directed to by the Tennessee Republican Party at our Aug 3<sup>rd</sup> meeting."

41. Defendant Corey Davenport falsely stated and cast false light on Plaintiff by stating, "At a special called meeting Sept 8<sup>th</sup> Mr. Gibbs refused to acknowledge our video

recording policies and set up a camera despite the request of the entire executive committee to stop the recording and take the camera down.”

42. Defendant Corey Davenport falsely stated and cast false light on Plaintiff by stating, “At the Sept 8<sup>th</sup> meeting, Mr. Gibbs aggressively agitated with our chairwoman Bonnie Thomas. Mr. Gibbs was witnessed by numerous people standing almost toe to toe to Ms. Thomas’ screaming in her face.”

43. Defendant Corey Davenport falsely stated, “Six days later on Sept 14<sup>th</sup>, Mr. Gibbs and members of the Cannon County Executive Committee attended a meeting of the Cannon county election commission and Mr. Gibbs was also asked to leave that meeting by a member of that board for speaking out of turn and once again for his angry comments toward vice chair Bonnie Thomas.”

44. Defendant Corey Davenport falsely stated and cast false light on Plaintiff by stating, “In October, Mr. Gibbs posted a highly edited video on two of his personal Facebook pages and sent out an email that included a link to the videos to all members of the Cannon County Republican Party to include State Senator Mae Beavers and State Representative Mark Pody in attempt to embarrass the executive committee members.”

45. Defendant Corey Davenport falsely stated and cast false light on Plaintiff by stating Mr. Gibbs web tagged the highly edited video to include the name Cannon County Republican Party, Gannon GOP, Corey Davenport, SEC Republican Party, GOP Chair Ryan Haynes in attempt to further embarrass the party

46. Defendant Corey Davenport cast false light on Plaintiff by stating, “In October Mr. Gibbs contacted the Cannon county Commission and asked them to request our DA Jennings Jones to investigate the deputy who removed him from the meeting for the charge of official oppression.”

47. Defendant Corey Davenport falsely stated and cast false light on Plaintiff by stating, “DA Jones returned a rule on December 2nd that corroborated our version of the events that determined that Mr. Gibbs’ aggressive behavior toward chairwoman Bonnie Thomas justified the officer to remove Mr. Gibbs from the meeting.”

48. Defendant Corey Davenport falsely stated, "In October, Mr. Gibbs filed an unfounded ethics complaint against former treasurer Dana Davenport for being a dual member of the executive committee and judicial commissioner as a method of retaliation against her."

49. Defendant Corey Davenport cast false light on Plaintiff by stating, "Mr. Gibbs sent vice chair Thomas a two page letter on Nov 18th threatening her with a law suit in attempt to intimidate her into making a public apology to him."

## **CAUSES OF ACTION**

### **COUNT I (LIBEL)**

50. The averments contained in paragraphs 1-30 are realleged as if set forth fully herein,

49. The Defendants' intentional, malicious and/or reckless publication and broadcast of materially false statements of and concerning the Plaintiff, Gibbs injured his character and diminished his reputation and standing in the community and caused him personal humiliation, mental anguish and suffering. The published letters and electronic broadcasts of these false and libelous statements were contained in the Defendants' written communication delivered to the leadership of the Tennessee Republican Party for the intentional, malicious purpose of undermining, embarrassing and destroying the good reputation of Plaintiff Gibbs.

50. The conduct by the Defendants entitles the Plaintiff, Gibbs to the relief sought.

### **COUNT II (SLANDER)**

51. The averments contained in paragraphs 1-10 and 32-49 are realleged as if set forth fully herein,

52. The Defendants' intentional, malicious and/or reckless uttered false statements of and concerning the Plaintiff, Gibbs injured his character and diminished his reputation and

standing in the community and caused him personal humiliation, mental anguish and suffering. The presentation of these false and slanderous statements were made in a intentional, malicious and/or reckless effort to cause Plaintiff Gibbs to be removed as chairman of the Cannon County Republican Party.

53. The conduct by the Defendants entitles the Plaintiff, Gibbs to the relief sought.

### **COUNT III (FALSE LIGHT INVASION OF PRIVACY)**

54. The averments contained in paragraphs 1-47 are realleged as if set forth fully herein.

55. The Defendants, through their intentional, malicious and/or reckless portrayal of the Plaintiff Gibbs in their electronic broadcasts on May 25, 2015, and subsequently by postings on their website, have cast him in a false light before the public, caused him emotional distress, personal humiliation, mental anguish and suffering.

56. The Defendants, through their intentional, malicious and/or reckless portrayal of the Plaintiff Gibbs in their written communications have cast him in a false light before the public, caused him emotional distress, personal humiliation, mental anguish and suffering.

57. The Defendants, through their intentional, malicious and/or reckless portrayal of the Plaintiff Gibbs in their spoken presentation on December 5, 2015 have cast him in a false light before the public, caused him emotional distress, personal humiliation, mental anguish and suffering.

58. The Plaintiff, Gibbs has sustained special injuries of which the false light invasion of his privacy is the legal cause, This conduct by the Defendants entitles Plaintiff, Gibbs to the relief sought.

**RELIEF**

59. WHEREFORE, the Plaintiff, James Gibbs, demands judgment against the Defendants as follows,

60. That compensatory damages be awarded to the Plaintiff, Gibbs in an amount of Two Hundred Fifty Thousand Dollars (\$250,000.00);

61. That punitive damages be awarded to the Plaintiff, Gibbs in an amount of Two Hundred Fifty Thousand Dollars (\$250,000.00);

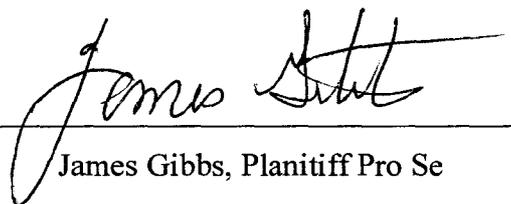
62. That the Defendants be ordered to retract each and every publication and broadcast of the defamatory and libelous and or slanderous statements regarding the Plaintiff, Gibbs;

63. That the costs of this matter be taxed to the Defendants;

64. That, pursuant to Rule 38,02, Tenn. R. Civ. P., a jury of twelve (12) persons be empanelled to try this cause; and

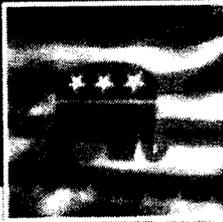
65. That such further and general relief as the Court deems reasonable and/or necessary be granted to the Plaintiff, Gibbs.

Respectfully submitted

A handwritten signature in black ink, appearing to read "James Gibbs", is written over a horizontal line.

James Gibbs, Plaintiff Pro Se  
4230 Burt Burgen Road  
Woodbury, TN 37190

Create Page



# Cannon County Republican Party

Political Organization

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2014  
2013  
2012  
2011

104 people like this

### ABOUT

The Cannon County Republican Party meets bi-monthly during non-election years. Please send us a message for further information.

### PHOTOS



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### Cannon County Republican Party

Everyone.

It is with deep sadness and regret that the Executive Committee of the Cannon County Republican Party must inform its members and supporters that as of April 15th, 2015, the Committee has formally begun an impeachment process of Chairman Jim Gibbs.

This impeachment process, as outlined within the State Republican Party's Bylaws, will ultimately lead to a formal hearing in Nashville where nine members of the State Executive Committee will hear evidence, vote, and determine Mr. Gibbs' future. Once that hearing takes place, the full 66 member body will vote to remove or retain Mr. Gibbs as Chairman of the Cannon County Republican Party.

Please note, the Cannon County Executive Committee's decision to ask for Mr. Gibbs removal was unanimous due to cause and his own actions.

Our Executive Committee has worked diligently to keep this matter as private as possible. We held a meeting with a member of the State SEC on April 9th, 2015 to act as a mediator in an effort to share our concerns with Mr. Gibbs and hopefully come to a resolve. Unfortunately, Mr. Gibbs refused to acknowledge the requests made by the Executive Committee and left the meeting.

All members of the Executive Committee signed a letter asking for Mr. Gibbs resignation prior to the impeachment process to try and resolve this problem before it was presented to the State Republican Party. However, as we were unable to persuade Mr. Gibbs to resign for the betterment of the party, we saw no option but to proceed with asking the State Republican Party to remove Mr. Gibbs from his role as Chairman due to cause.

Until this process is complete, and in accordance with the Cannon County Republican Party media policy passed on 5/11/2015 by unanimous consent, all official communications will be distributed by the party through our Facebook account.

We would also like to ensure everyone knows our correct mailing address is:

Cannon County Republican Party  
P.O. Box 262  
Woodbury, TN 37190

We are aware of the mass emails being produced and distributed with innuendos and misinformation by Mr. Gibbs that attack the integrity of the members of the Cannon County Executive Committee and the recently passed Cannon County 2015-2017 Bylaws. We are very disappointed in Mr. Gibbs continued efforts to mislead the members of our party here in Cannon County, but will not engage in a tit for tat that could divide or embarrass the party further. We choose to allow the State Republican Party to resolve the matter with fairness to both sides of the issues.

As there can be no winners in any decision made by the State Party concerning Mr. Gibbs Chairmanship we ask for your patience as we work through this difficult time.

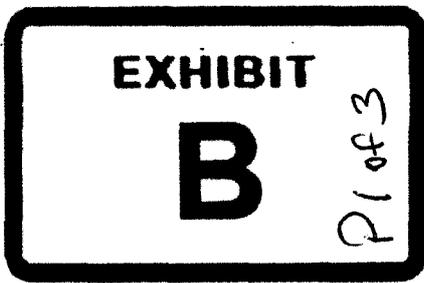
Respectfully,

Cannon County Republican Party Executive Committee

Like Comment Share

Jennifer Franklin Winfree likes this.





FILED

2016 FEB -1 PM 12:17

RICHARD R. ROCKER, CLERK

*Richard R. Rocker*  
D.C.

Reasons of Cause

The Cannon County Republican Party Executive Committee cites the following reasons of "cause" for removal of current Chairman Jim Gibbs from the Executive Committee.

1. The Cannon County Republican Party called for a Republican Primary to be held in Cannon County in May 2014 for all elected offices held in Cannon County. Prior to the primary Mr. Gibbs picked up papers from the Cannon County Election Commission Office and ran for the elected position of Cannon County Commissioner as an Independent candidate and **NOT** as a Republican candidate.
2. Mr. Gibbs began stating as early as March 2015 to members of the Executive Committee in a derogatory manner that he had manipulated the election for the office of Chairman during our February 2015 reorganization meeting to favor his election to the position of Chairman.
3. Mr. Gibbs stated to the Past Party Chairman Corey Davenport on April 1<sup>st</sup>, 2015 that "he beat us at our own game" in reference to his election as Chairman at the reorganization meeting in February 2015. Mr. Gibbs implied that he stacked the deck with people to ensure his election to the role of Chairman.
4. It has been determined that five persons who voted in the February 9<sup>th</sup>, 2015 reorganization meeting for Mr. Gibbs were not eligible to vote due to not meeting the requirements of eligibility per the Tennessee Republican Party ByLaws.
5. Mr. Gibbs conducted an interview on Channel Four News in March 2015 in opposition to State Representative Judd Matheny's (R) bill HB0934. Representative Matheny's bill concerned exploding shooting targets called Tannerite. Mr. Gibbs was adamantly opposed to the bill and identified his title as Cannon County Republican Party Chairman during the interview and did so without the consent or knowledge of the Executive Committee. Members of the Executive Committee received phone calls after the interview wanting to know "why the Cannon County Republican Party was against the 2<sup>nd</sup> Amendment" due to Mr. Gibbs Channel Four interview.
6. Mr. Gibbs posted on his own personal Facebook page a video link to the Channel Four News interview where his title of "Chairman of the Cannon County Republican Party" was used without the knowledge or consent of the Executive Committee. This video was viewed over 200 times.
7. Mr. Gibbs posted on his own personal Facebook page a link to a video using the unauthorized [www.cannongop.com](http://www.cannongop.com) website showing exploding Tannerite targets to impress his own personal view to others in an effort to discredit State Representative Judd Matheny's (R) HB0934 without the consent or knowledge of the Cannon County Republican Party Executive Committee and refused to remove the link when asked to do so by the Executive Committee.
8. Mr. Gibbs ignored repeated requests by members of the Executive Committee to stop using the title "Cannon County Republican Party Chairman" when conducting media interviews on matters not directly related to the Cannon County Republican Party and or its members.

**EXHIBIT****B**

Page 3

9. Mr. Gibbs ignored repeated requests to stop using the Cannon County Republican Party name when expressing his own personal views on matters unrelated to the Cannon County Republican Party and or its members.
10. Mr. Gibbs created the email address [gop@cannoncounty.net](mailto:gop@cannoncounty.net) without the consent or knowledge of the Executive Committee and maintains exclusive control of the email to send out content to members of the Cannon County Republican Party that is not being viewed or authorized by the Executive Committee prior to publication.
11. Mr. Gibbs purchased the website domain [www.cannongop.com](http://www.cannongop.com) without the consent or knowledge of the Cannon County Republican Party and maintains exclusive control of the website and refuses to acknowledge the name and use of the domain should belong to the Cannon County Republican Party and not remain in Mr. Gibbs exclusive control.
12. Mr. Gibbs maintains exclusive control of the [cannoncountygop@yahoo.com](mailto:cannoncountygop@yahoo.com) email address and refuses to acknowledge the name and use of the email address belongs to the Cannon County Republican Party and not remain in Mr. Gibbs exclusive control.
13. Mr. Gibbs wrote and submitted an article to the Cannon County Courier newspaper entitled "Republican Party Chairman Jim Gibbs Clarifies Election Commission Process" without the knowledge or consent of the Executive Committee.
14. Mr. Gibbs stated in the Cannon Courier article that "The Cannon County Republican Party will monitor the activities of the Cannon County Election Commission" without the knowledge or consent of the Executive Committee.
15. Mr. Gibbs submitted an article to the WBRY Radio station in Cannon County for publication on the website and on the radio restating that the Cannon County Republican Party would monitor the activities of the Cannon County Election Commission without the consent or knowledge of the Executive Committee.
16. The Executive Committee requested a meeting with Mr. Gibbs to discuss the issues the board felt were detrimental to the Cannon County Republican Party as a whole. The board requested a mediator (SEC Representative Beth Campbell) to be present to ensure both Mr. Gibbs and the Executive Committee had ample opportunity to explain their differences and try to come to an amicable resolve. Mr. Gibbs stated to the Executive Committee during the meeting that "he was not elected Chairman by the Executive Committee" and was not subject to the Executive Committee's counsel.
17. Mr. Gibbs remains obstinate that he is the "Chief Executive Officer of the Cannon County Republican Party and he will continue to do as he pleases and "if the people don't like it then they can vote for someone else in two years".
18. Mr. Gibbs refuses to work with the Cannon County Executive Board and refuses to acknowledge that the Chairman and the board work in unison together in an effort to grow the party and help elect bonafide members of the Republican Party to elected office.
19. Mr. Gibbs has become an embarrassment to the Executive Committee and to the members of the Cannon County Republican Party who have worked diligently to make it a great organization over the last five years. He remains obstinate in his belief that he and he alone has total control over the messaging and positions taken by the Cannon County Republican Party.

20. Mr. Gibbs behavior is not supportive of the Cannon County Republican Party or the Executive Committee and is advancing his personal opinions above those of the party.
21. Mr. Gibbs has threatened a lawsuit against every member of the Cannon County Republican Party Executive Committee to include SEC Representatives Albert McCall, Jr. and Jennifer Winfree.

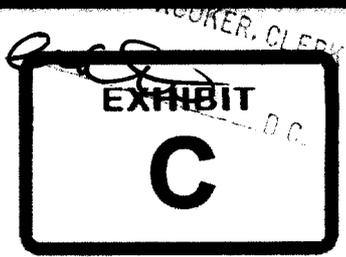




FILE

September 8<sup>th</sup>, 2015

Ryan Haynes, Chairman  
Tennessee Republican Party  
2424 21<sup>st</sup> Ave. Suite 200  
Nashville, TN 37212



Dear Chairman Haynes,

As members of the Cannon County Executive Committee we are officially notifying you of the Executive Committee's request to reinstate the removal of Jim Gibbs from his position as Chairman of the Cannon County Republican Party and as a member of the Cannon County Executive Committee. Once again, we also request that the T.R.P. instruct Mr. Gibbs to remove all references to the Cannon County Republican Party from his own personal Facebook page, turn over access to the email entitled [gopnews@cannoncounty.net](mailto:gopnews@cannoncounty.net) , turn over access to the email entitled [cannoncountygop@yahoo.com](mailto:cannoncountygop@yahoo.com) and turn over access to the website entitled [www.cannongop.com](http://www.cannongop.com) .

The request for his removal is in accordance with T.R.P. Bylaws below:

1. **Rule G Removal of County Officers: Section 1.** "the County Party Chairman may be removed for "cause" by action of the State Chairman and the State Executive Committee in a manner similar to that described in Article III, Section 4 of these Bylaws and rules, upon written request signed by two-thirds (2/3) of the County Executive Committee.

Despite repeated requests by the Executive Committee and by the State of Tennessee Republican Party, Mr. Gibbs is continuing to violate the by-laws and policies that have been approved by the T.R.P. He is in blatant disregard to repeated requests to comply with the approved individual policies of the C.C.R.P.

We asked the T.R.P. this past July to suspend the request to remove Mr. Gibbs from his role as Chairman in the hopes that we could resolve the issues between us and move forward. Unfortunately, matters have deteriorated over the previous several weeks. We see no end to the conflict that has rendered the CCRP impotent as long as Mr. Gibbs remains in the position of Chairman.

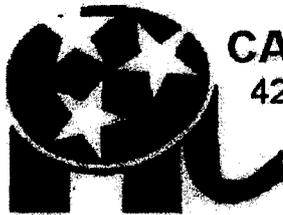
A copy of this letter has been sent to Mr. Gibbs via Registered Mail to ensure he is aware of the issues and concerns of the Cannon County Executive Committee. We understand that Mr. Gibbs has ten (10) days to respond.

We are requesting that the T.R.P. provide assistance in this matter and help guide us to a conclusion that will ensure that Mr. Gibbs and the members Executive Committee are provided with all due respect necessary.

Sincerely,

Cannon County Executive Committee

*[Handwritten signatures]*  
 Dana Davenport  
 Bonnie L. Thomas  
 Randall Reed

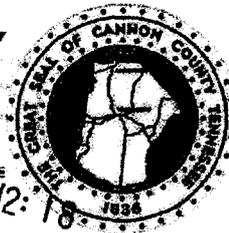


# CANNON COUNTY REPUBLICAN PARTY

4230 Burt Burgen Rd., Woodbury, Tennessee 37190

Phone: 615-494-5100 - Fax: 888-496-0270

Email: [GOP@CannonCounty.net](mailto:GOP@CannonCounty.net)



September 22, 2015

Dana Davenport  
182 New Street  
Woodbury, TN 37190

Dear Mrs. Davenport,

Hand delivered by *Richard R. Rooker* Chairman Jim Gibbs to  
Dana Davenport at approximately 2pm  
September 22, 2015 at the Chancery Court  
Clerk's office, Woodbury TN.

It has been brought to my attention that in February of 2015, you were appointed by Sessions Court Judge Susan Melton as a judicial commissioner. I am surprised that you did not realize the importance to disclose your appointment to the Chairman of the Cannon County Republican Party who oversees the executive committee to which you were also appointed as treasurer.

The Tennessee Supreme Court has adopted a Code of Judicial Conduct, which sets forth the ethics rules for Tennessee judges, magistrates and judicial commissioners. Chief Justice Cornelia A. Clark said, "Maintaining a high standard of judicial ethics is paramount to the public's trust and confidence in the courts and the judges who preside over them."

As the elected Vice-Treasurer and ultimately appointed Treasurer of the Cannon County Republican Party you have violated the Code of Judicial Conduct by failing to disclose your appointment to the Judiciary as a judicial commissioner serving the Session Court of Cannon County and immediately resigning your position as a leader in a political organization.

Tennessee Supreme Court Rule 10, Canon 4; Rule 4.1 Political and Campaign Activities of Judges and Judicial Candidates in General, prohibits: (A) Except as permitted by law, or by RJC's 4.2, 4.3, and 4.4, a judge or a judicial candidate shall not: (1) act as a leader in, or hold an office in, a political organization.

Therefore, I ask your immediate resignation from the executive committee today Tuesday, September 22, 2015 via email to [jimgibbs@careerinstitute.us](mailto:jimgibbs@careerinstitute.us).

Sincerely,

Jim Gibbs, Chairman





RICHARD R. PECKER, CLERK

October 18, 2015  
D.C.

To Whom It May Concern:

It has come to our attention that there is a matter in front of your board concerning Mrs. Dana Davenport and her previous role as a member of the Cannon County Executive Committee and her role as a Judicial Commissioner. First, let us apologize that our internal disciplinary action concerning our current Chairman Jim Gibbs has now become entangled with your organization and Mrs. Davenport. For the purposes of your investigation, allow us to set the record straight on several key issues.

1. Mrs. Davenport's dual role within our organization and yours was a known fact from the very beginning of her appointment as a Judicial Commissioner by all members of the Executive Committee to include Mr. Gibbs.
2. At no time did anyone within our party attempt to deceive or hide Mrs. Davenport's dual role.
3. What was not known was an apparent rule within your policies that do not allow the dual role. Any suggestion made by Mr. Gibbs to that effect is false and misleading.
4. During the August 3<sup>rd</sup>, 2015 meeting of the Republican Party Mrs. Davenport was elected by unanimous consent to the office of Treasurer and there were no objections made to her election by any member of the committee to include Mr. Gibbs.
5. During a special called meeting on September 8<sup>th</sup>, 2015 Mr. Gibbs was removed from the meeting by a Deputy Sheriff. Mrs. Davenport was not involved with any decision making process concerning Mr. Gibbs removal from the meeting in any shape or form nor did she have any conversation with the Deputy during the meeting. Mr. Gibbs actions alone were the determining factor that caused his removal from the meeting.
6. The Cannon County Sheriff's department and the District Attorney's Office had been previously consulted because of an ongoing issue of Mr. Gibbs and theft of Cannon County Republican Party property. It had also become alarmingly clear that Mr. Gibbs increased hostility toward the board members could produce an explosive situation that might warrant the need for a member of law enforcement to be present. The CCRP Executive Committee will continue to request a Deputy Sheriff be present as long as Mr. Gibbs continues in his role as Chairman.
7. The CCRP Executive Committee was notified as soon as Mrs. Davenport became aware of her inability to continue as a part of our leadership team.
8. Mrs. Davenport's resignation is on file with the CCRP Secretary and the State of Tennessee Republican Party was notified of her resignation.

**EXHIBIT**  
**E**  
P1 of 2

9. A meeting took place on September 14<sup>th</sup>, 2015 at the Cannon County Election Commission Office on a matter concerning Mr. Gibbs and the CCRP Executive Committee. There were four members of the CCRP Executive Committee present to discuss those matters to include Mr. Gibbs. Mr. Gibbs was the only officer that was identified by his title during the meeting. Although Mrs. Davenport was in attendance she was never identified as a member of the Executive Committee nor did she provide testimony concerning any matter before that board. She had already resigned her position as Treasurer of the C.C.R.P and was there on her own accord.
10. Our board has now been placed on probationary status and all meetings are expressly forbidden without the consent of the State of Tennessee Republican Party Chairman Ryan Haynes. This probation is due to a request made by the Executive Committee to remove Mr. Gibbs from his role as Chairman due to cause.

We as a party will truly miss Mrs. Davenport's involvement on our board. She has built a reputation of integrity on a lifetime of service within our community. We sincerely hope you will not allow the effects of an internal disciplinary action between Mr. Gibbs and our board damage her reputation as a Judicial Commissioner.

You may contact us by mail or by email at the addresses listed below:

Cannon County Republican Party  
P.O. Box 262  
Woodbury, TN 37190

Vice-Chairman Bonnie Thomas at: [blpqt415@gmail.com](mailto:blpqt415@gmail.com)  
Vice-Treasurer Randall Reid at: [randallpat04@gmail.com](mailto:randallpat04@gmail.com)  
Secretary John Wilkinson at: [wilkinsonsawmill@gmail.com](mailto:wilkinsonsawmill@gmail.com)  
Past Chairman Corey Davenport at: [coreydavenport25@yahoo.com](mailto:coreydavenport25@yahoo.com)

Sincerely,

*Bonnie Thomas - vice chairman*

*Corey Davenport - Past Chairman*

*Randall Reid - Vice Treasurer*

*John Wilkinson - Secretary*

Cannon County Republican Party Executive Committee

EXHIBIT

E

*Proof*