

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF KALAMAZOO

---

SABRINA PRITCHETT-EVANS and  
KIMBERLY HARRIS,

Plaintiffs,

Case No. 2023-0169-CZ

v

HON. CURTIS J. BELL

REPUBLICAN PARTY OF KALAMAZOO  
COUNTY, STATE OF MICHIGAN (KGOP),  
KALAMAZOO GRAND OLD PARTY  
EXECUTIVE COMMITTEE (KGOPEC); and  
(AKA) KALAMAZOO COUNTY  
REPUBLICAN COMMITTEE (KGOPEC),  
and KELLY SACKETT,  
Defendants.

---

DEPOSITION OF SABRINA PRITCHETT-EVANS

DATE: June 30, 2023  
TIME: 9:07 a.m.  
LOCATION: Fairfield Inn & Suites by Marriott  
3303 Retail Place Drive  
Kalamazoo, Michigan  
REPORTER: Rebecca S. Renzema, CSR-1435

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1 APPEARANCES:

2

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9

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15 On behalf of Defendants

16

17 ALSO PRESENT: Charley Coss (starting at page 41)

18 Kelly Sackett

19

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21

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1 Kalamazoo, Michigan

2 June 30, 2023; 9:07 a.m.

3 \*\*\*

4 SABRINA PRITCHETT-EVANS,

5 after having been duly sworn, was examined and  
6 testified as follows:

7 EXAMINATION

8 BY MR. DePERNO:

9 Q. Good morning.

10 A. Good morning.

11 Q. Can you please state your full name and spell your name?

12 A. Sabrina Pritchett-Evans. S-a-b-r-i-n-a P-r-i-t-c-h-e-t-t-  
13 E-v-a-n-s.

14 Q. What is your maiden name?

15 A. Pritchett.

16 Q. Do you go by any other names?

17 A. Like, my family name?

18 Q. Any other names that people may call you.

19 A. Like you? You called me a lot of names. But you can say  
20 Brina. My mom calls me that.

21 Q. Brina?

22 A. Uh-huh.

23 Q. Have you ever had your deposition taken before?

24 A. Yes, I have.

25 Q. So we understand the rules and you must be familiar with them,

1 I'll ask you a series of questions and you'll provide answers.  
2 Please wait till I'm done asking the question before you  
3 answer the question so that the court reporter can take down  
4 an accurate record. Fair enough?

5 A. Uh-huh. Fair.

6 Q. Also, when you give answers, make sure you give an audible  
7 answer, a yes, no, for instance, rather than a shaking of the  
8 head or some other indication of your answer. So we want a  
9 clear record, verbal responses. Fair enough?

10 A. Yes.

11 Q. Okay. Do you have any conditions today that would affect your  
12 memory?

13 A. No.

14 Q. Do you have any conditions that would affect your ability to  
15 answer questions today completely and truthfully?

16 A. No.

17 Q. Are you taking any medication that would affect your memory?

18 A. No.

19 Q. Are you taking any medication that would affect your ability  
20 to answer questions today completely and truthfully?

21 A. No.

22 Q. Do you have any other reason to believe or are there any other  
23 things that you believe are affecting your memory today or  
24 your ability to completely answer and truth -- to answer  
25 completely and truthfully today?

- 1 A. No.
- 2 Q. What is your date of birth?
- 3 A. 5-3-66.
- 4 Q. And your place of birth?
- 5 A. Battle Creek, Michigan.
- 6 Q. What is your home address?
- 7 A. 4925 Pepperbush Lane, Kalamazoo, Michigan, 49004.
- 8 Q. Are you married?
- 9 A. Yes.
- 10 Q. Do you have any children?
- 11 A. Yes.
- 12 Q. How many children?
- 13 A. Two.
- 14 Q. Have you ever been convicted of fraud or any other crime,  
15 misdemeanor or felony?
- 16 A. No.
- 17 Q. Have you ever been investigated for fraud or any other crime,  
18 misdemeanor or felony?
- 19 A. No. Investigated? No.
- 20 Q. Have you ever been involved in any civil litigation?
- 21 A. Civil litigation? Yes.
- 22 Q. How many times?
- 23 A. A couple.
- 24 Q. A couple is --
- 25 A. Two.

1 Q. Two? Were you the plaintiff or the defendant?

2 A. One time I was a plaintiff and one time I was -- it was just  
3 business stuff. It was business. That was -- part of it for  
4 business.

5 Q. When you were a plaintiff do you recall the case name?

6 A. No, I do not.

7 Q. Do you recall what year it was filed?

8 A. No, I do not.

9 Q. Do you recall what county it was filed in?

10 A. I would assume Kalamazoo County, but I'm not sure.

11 Q. Who did you sue?

12 A. State Farm.

13 Q. Who was your attorney?

14 A. Stephen Drew.

15 Q. Why did you sue State Farm?

16 A. Discrimination.

17 Q. What type of discrimination?

18 A. Racial discrimination.

19 Q. What was the outcome?

20 A. It was settled out of court.

21 Q. What was the case where you were a defendant?

22 A. I was never a defendant. Well, I wasn't a defendant.  
23 Actually, it was State Farm. I was not a defendant.

24 Q. You were not?

25 A. No, it was State Farm. I was just -- it was my office, but

1 State Farm actually got sued, so -- so one, put one.  
2 Q. So you've been sued one time?  
3 A. No. I have not been sued.  
4 Q. I'm sorry. You were a plaintiff one time?  
5 A. Yes, and the other time it was just involved in State Farm.  
6 So never mind.  
7 Q. Were you a witness in that case?  
8 A. I was deposed.  
9 Q. What was that case about?  
10 A. I have no idea. Somebody had an accident.  
11 Q. What is your business?  
12 A. Insurance and financial services.  
13 Q. Do you have an employer?  
14 A. No.  
15 Q. So you run your own business?  
16 A. A 1099.  
17 Q. Who sends you the 1099?  
18 A. State Farm. And other individuals, whoever --  
19 Q. What is your address for your business?  
20 A. 2618 Portage Street, Kalamazoo, Michigan, 49001, and  
21 1400 Kalamazoo Street, Suite 2, South Haven, Michigan, 49090.  
22 Q. How long have you been operating this business?  
23 A. '93.  
24 Q. Do you have a high school diploma?  
25 A. Yes, I do.

- 1 Q. Do you have any college degrees?
- 2 A. Yes, I do.
- 3 Q. How many?
- 4 A. One.
- 5 Q. From what university?
- 6 A. Western Michigan University.
- 7 Q. What year did you graduate?
- 8 A. I think it was winter of '88. I think that's when it was.
- 9 I'm not quite sure. I think it was winter of '88.
- 10 Q. What was your major?
- 11 A. Business administration.
- 12 Q. Other than a driver's license, do you have any other licenses  
13 and certifications?
- 14 A. Various insurance certifications, yes.
- 15 Q. Insurance?
- 16 A. Insurance and financial services certifications.
- 17 Q. Are you required to be licensed to sell insurance?
- 18 A. Yes, you are.
- 19 Q. So you have a license to sell insurance, correct?
- 20 A. Yes, I do.
- 21 Q. Are you required to be licensed to provide financial  
22 consulting?
- 23 A. Yes, you are.
- 24 Q. So you have two licenses; one to sell insurance and one to do  
25 financial services?

1 A. Well, the licenses are broken up. It's various licenses.

2 Q. Okay. Other than your insurance and financial licenses and  
3 certifications, are there any other licenses or  
4 certifications?

5 A. I have a CPL.

6 Q. Have you ever had any disciplinary actions?

7 A. No.

8 Q. Any revocations of your licenses?

9 A. No.

10 Q. Are you member of any professional associations?

11 A. NAFA(ph), National Association of Insurance Professionals.

12 (Exhibit 1 marked for identification.)

13 BY MR. DePERNO:

14 Q. Exhibit 1 in front of you is a notice of deposition. Are you  
15 familiar with this?

16 A. Yes, I am.

17 Q. Do you understand that you're here today for a deposition as  
18 part of a lawsuit?

19 A. Yes, I do.

20 Q. And this is a lawsuit that you filed, correct?

21 A. Yes.

22 Q. Did you bring any documents with you today other than what you  
23 have previously produced?

24 A. Just what I produced, unless you see something I didn't.

25 Q. Well, I mean, I don't know. I'm asking you if there's --

1 A. Well, I believe I produced it, unless you want a couple of  
2 Bible verses. I have those.

3 (Clarification question by Reporter.)

4 THE WITNESS: I have a couple Bible verses if you  
5 would like those. I didn't produce those.

6 BY MR. DePERNO:

7 Q. Not unless you think they're relevant to your document  
8 production or if you're wanting to supplement your document  
9 production.

10 A. No. Only if you want them. They're for me.

11 Q. Okay. Do you believe that you produced everything there is to  
12 produce pursuant to the document request?

13 A. I believe I have. You asked for a lot, so there could be  
14 something missing. But I believe I have produced what I could  
15 find.

16 Q. Have you turned over all of your chat messages or text  
17 messages?

18 MR. THOMAS: Objection. There is objections on  
19 those.

20 BY MR. DePERNO:

21 Q. Outside of the objections that were made, do you believe you  
22 turned over all the chat messages or text messages?

23 A. I produced what I had.

24 Q. Did you delete any chat messages or text messages prior to  
25 production?

- 1 A. What text messages?
- 2 Q. Did you delete from your texts or chat groups any messages  
3 that were required to be produced?
- 4 A. When?
- 5 Q. I'm asking you. Would you have deleted any text messages?
- 6 A. Are you talking about in my life? Are you talking about --  
7 within what time frame?
- 8 Q. Well, within the time frame requested in the document  
9 production.
- 10 A. Well, if I did it was accidental because my phone basically  
11 ran out of space.
- 12 Q. What did you do to prepare for this deposition today?
- 13 A. Drove here.
- 14 Q. Did you talk to anyone about this deposition?
- 15 A. No.
- 16 Q. Were you prepared by counsel for this deposition?
- 17 A. No.
- 18 Q. Did you read any documents in preparation for this  
19 deposition?
- 20 A. Yeah, I read the bylaws, MCL 168.599.  
21 (Exhibit 2 marked for identification.)
- 22 BY MR. DePERNO:
- 23 Q. The bylaws are marked as Exhibit 2 in front of you.
- 24 A. Uh-huh.
- 25 Q. When you say you read the bylaws, are those the bylaws that

1 you've referred to?

2 A. Let's see. "Republican Party of Kalamazoo County, State of  
3 Michigan." Yes, I read those bylaws, I read the state bylaws,  
4 I read 168.599.

5 Q. What was your involvement in politics prior to 2020?

6 A. I was not involved in politics.

7 Q. What was your involvement in politics after 2020?

8 A. I attended meetings.

9 Q. Where did you attend meetings?

10 A. The Kalamazoo Republican luncheons, breakfasts.

11 Q. When did you first contact the Kalamazoo County Republican  
12 Committee?

13 A. I never contacted them. I went to a lunch and I don't  
14 remember the date.

15 Q. Why did you go to that lunch?

16 A. Kelly Sackett invited me to a lunch.

17 Q. When did you first meet Kelly Sackett?

18 A. I met Kelly Sackett online. Well, actually -- in person, I  
19 can't remember.

20 Q. But you remember meeting her online?

21 A. Yes.

22 Q. On what platform?

23 A. I think it was Walk Away.

24 Q. What is Walk Away?

25 A. Walk Away is, like, walk away from the Democrat party. It's a

1 website.

2 Q. Were you a member of the Democratic party?

3 A. No, I wasn't a member of the Democratic party.

4 Q. Did you create a profile on this website called Walk Away?

5 A. A profile?

6 Q. Yeah.

7 A. I don't know anything about a profile.

8 Q. How was it that Kelly Sackett and you connected on this  
9 website called Walk Away?

10 A. I made a post.

11 Q. Do you recall about the time you made that post?

12 A. No, I do not.

13 Q. Do you recall what that post said?

14 A. No, I do not.

15 Q. Do you recall who initiated the contact between yourself and  
16 Kelly Sackett?

17 A. Kelly Sackett.

18 Q. Do you recall what she stated?

19 A. No, I do not.

20 Q. Were you on the board for the League of Women Voters?

21 A. Yes, I was.

22 Q. When was that?

23 A. I don't remember.

24 Q. How long were you a member of the board for League of Women  
25 Voters?

1 A. I don't remember.

2 Q. Was it prior to 2020 or after 2020?

3 A. I don't remember.

4 Q. Why did you join the board of the League of Women Voters?

5 (Interruption in proceedings.)

6 A. Hold on. Let me turn my phone off. A customer asked me.

7 Q. Who was that customer?

8 A. I can't remember.

9 Q. What were your duties as a board member for the League of  
10 Women Voters?

11 A. Attend meetings.

12 Q. Was that your sole responsibility?

13 A. Yes.

14 Q. Did you view the League of Women Voters as a Democratic  
15 organization or a Republican organization?

16 A. The League of Women Voters posts itself as a nonpartisan  
17 organization.

18 Q. And do you believe that to be true?

19 A. That would be conjecture because it's a nonpartisan  
20 organization.

21 Q. Do you believe that the League of Women Voters has a political  
22 bias one way or the other?

23 MR. THOMAS: Objection, speculation. She's already  
24 answered it.

25 MR. DePERNO: I'm asking for her opinion.

1 MR. THOMAS: It's speculation.

2 BY MR. DePERNO:

3 Q. I'll take an answer.

4 A. Conjecture since it's a nonpartisan organization.

5 Q. So you're refusing to answer the question?

6 MR. THOMAS: No, she answered the question. She  
7 says conjecture. She doesn't know.

8 BY MR. DePERNO:

9 Q. Did you disclose to the Kalamazoo County Republican party that  
10 you were a board member of the League of Women Voters?

11 A. Is that required? That's not required.

12 Q. I'm asking if you did.

13 A. It's not required.

14 Q. I'm asking whether or not you did.

15 A. I talked to -- Kelly knows I was a member of the -- so if  
16 Kelly is considered the Kalamazoo Republican Committee, then  
17 yes, but that is not required.

18 Q. The question is not whether it's required. I simply asked,  
19 did you disclose to the Kalamazoo County Republican  
20 Committee --

21 A. It's not required.

22 MR. DePERNO: Okay. I'll take that as a refusal to  
23 answer.

24 MR. THOMAS: She answered it. It's not required.  
25 So she's saying she didn't.

1 MR. DePERNO: No, she didn't say she didn't. She  
2 said it's not required. She's not giving an actual answer to  
3 the question.

4 BY MR. DePERNO:

5 Q. The question is a yes or no question. Did you or did you  
6 not --

7 A. I told Kelly Sackett.

8 Q. Were you a board member for the Boys & Girls Club?

9 A. Never.

10 Q. Were you a board member for Tendaji Giving Circle?

11 A. You don't even understand what that is. It is not a board.

12 Q. Explain to me what Tendaji Giving Circle is.

13 A. It's just women that get together once a year and give money.  
14 There's no board.

15 Q. Who do you give money to on this group called Tendaji Giving  
16 Circle?

17 A. Women get to nominate organizations.

18 Q. Have you ever nominated an organization?

19 A. I nominated Ascension.

20 Q. Ascension?

21 A. Uh-huh.

22 Q. What is Ascension?

23 A. A hospital. And First Day Shoe Fund. I believe I nominated  
24 First Day Shoe Fund, too.

25 (Exhibit 3 marked for identification.)

1 BY MR. DePERNO:  
2 Q. I'm showing you Exhibit 3.  
3 A. Yes.  
4 Q. This is a post from the Boys & Girls Club of Greater  
5 Kalamazoo.  
6 A. Uh-huh.  
7 Q. It says, "Thank you to Tendaji Giving Circle! We recently  
8 received their grant for Diversity, Equity, Accessibility and  
9 Inclusion ..." It's a picture of you, I believe, holding a  
10 \$5,000 check. Who are the other people in this picture?  
11 A. It is Belinda Tate and -- oh, gosh, I can't remember the other  
12 name.  
13 Q. Who is the man?  
14 A. I don't know him.  
15 Q. Which is one is Belinda Tate?  
16 A. Belinda has the glasses on.  
17 Q. Were you proud to give a \$5,000 check to Boys & Girls Club on  
18 behalf of Diversity, Equity, and Inclusion?  
19 A. I did not know that it was for DEI.  
20 Q. How did you not know it was for DEI?  
21 A. Because I was not involved that year in the -- I didn't  
22 participate that year. I only went for the check  
23 presentation.  
24 Q. Do you regret giving \$5,000 to Boys & Girls Club for DEI?  
25 A. I did not give \$5,000.

1 Q. Do you regret handing a check to Boys & Girls Club for the --

2 A. I held the check. I didn't hand him the check.

3 Q. Do you regret holding the check for Boys & Girls Club for  
4 DEI?

5 A. I did not know it was DEI.

6 Q. Are there any other liberal organizations in which you were a  
7 member of the board of directors?

8 A. I have no idea what you would call a liberal organization.

9 Q. So you don't understand the term liberal?

10 A. Apparently not, so could you tell me -- ask me which  
11 organizations since you know.

12 Q. It's not my job to define --

13 A. Okay. Then --

14 MR. THOMAS: Object to ambiguity. If you're going  
15 to ask a question, ask it specifically, please. Don't just  
16 throw out liberal because -- what is liberal? She's right.  
17 Name something and if she has an issue with it, she can say  
18 yes or no if that's a liberal organization.

19 BY MR. DePERNO:

20 Q. I'll take it as a -- that you don't understand the term  
21 liberal. Were you at one point an ex officio member for the  
22 Kalamazoo County Republican Committee Executive Committee?

23 A. Yes.

24 Q. Why were you an ex officio member?

25 A. Because I am the chair of the Kalamazoo Republican Women's

1 Association.

2 Q. Who is the president of that association?

3 A. Of the Kalamazoo Republican Women's Association?

4 Q. Yes.

5 A. Well, I am the chair of it.

6 Q. Is there a president of --

7 A. Not of the Kalamazoo Republication Women's Association. There  
8 is no chair or president of that.

9 Q. What does the Republican Women's Association do?

10 A. We have meetings once a month, invite speakers.

11 Q. Who are the other board members on that association?

12 A. Sarah Gage, Adrian McClelland.

13 Q. Is Robyn Peake part of the Kalamazoo Republican Women's  
14 Association?

15 A. She's part of the Republican Federation -- Republican -- I  
16 always get that name mixed up, something Kalamazoo -- not  
17 Kalamazoo -- Republican Federation of Women, Michigan. I  
18 could have the words kind of twisted there.

19 Q. Are you friends with Robyn Peake?

20 A. Personal friends?

21 Q. Yes.

22 A. Like, we hang out friends?

23 Q. Friends.

24 A. We're associates.

25 (Exhibit 4 marked for identification.)

1 BY MR. DePERNO:

2 Q. Exhibit 4 is a social media post made by Robyn Peake wherein  
3 she states her opposition to Muslims running for state party  
4 seats. Do you agree with Robyn Peake's statement?

5 A. No. I've never seen it. I mean, I hadn't seen it until you  
6 did it as an exhibit.

7 Q. Have you ever talked to Robyn Peake about her statements  
8 regarding Muslims?

9 A. No.

10 Q. Have you ever condemned Robyn Peake's statement regarding  
11 Muslims?

12 A. I just told you I had not seen it.

13 Q. Now that you have seen it and it's been attached to exhibits  
14 in this case or as an exhibit in this case, do you agree with  
15 Robyn Peake's statement regarding Muslims?

16 A. No.

17 Q. At the beginning of May of 2023 Dan Hartman, the MiGOP  
18 attorney, stated, "It's crazy as Christians that we've allowed  
19 any other voice but a Christian voice into the marketplace of  
20 ideas." Do you recall that statement?

21 A. It was a video. I watched the video.

22 Q. Okay. Have you made any public comment regarding that  
23 statement?

24 A. Yes, I did.

25 Q. What was your statement?

- 1 A. I said that you don't know history. Matt DePerno does not  
2 know history is what I said in my statement.
- 3 Q. So in response to --
- 4 A. Well, actually no, that wasn't the one which you didn't know  
5 history. That one was another one, post, that I said that you  
6 didn't know history. This one was the fact that Dan Hartman's  
7 statement was taken out of context because what he said is  
8 Christians have allowed other ideologies -- or whatever the  
9 wording was -- into the marketplace of Christianity and no  
10 other religion would have allowed that, and he is absolutely  
11 right about that.
- 12 Q. So you are the vice chair of District 4, is that correct?
- 13 A. Yes.
- 14 Q. So the vice chair -- as the vice chair of District 4, you  
15 support Dan Hartman's statement?
- 16 A. No other religion would have allowed other ideologies into  
17 their religions. Yes, I support that portion of it.
- 18 Q. When did you become a delegate?
- 19 A. August of 2022.
- 20 Q. Why did you want to be a delegate?
- 21 A. To get involved.
- 22 Q. When was your first interaction with Anna Kamp?
- 23 A. I've never met her.
- 24 Q. Have you ever talked to Anna Kamp?
- 25 A. No.

1 Q. Have you ever engaged on her Telegram group or any other chat  
2 group for Unity for MRP?

3 A. Not that I know of.

4 Q. Describe what a delegate is.

5 A. A delegate is a representative for your county. You represent  
6 your precinct. You are the voice for your precinct within  
7 the party and you also have -- you also attend conventions,  
8 county and state conventions.

9 Q. Any other duties of a delegate?

10 A. I would have to look them all up.

11 Q. So sitting here today you can't describe to me, other than  
12 what you've already described, what an actual delegate does?

13 A. Like I said, I'd have to look them up.

14 MR. THOMAS: Asked and answered. She just said she  
15 would have to look them up for you.

16 BY MR. DePERNO:

17 Q. When did you first meet Joel Studebaker?

18 A. When did I first meet Joel Studebaker? I think I met him in  
19 passing. We went to their second convention.

20 Q. Who is "their"?

21 A. Like, Ottawa had a second convention so we went there, but I  
22 met him in passing.

23 Q. Why did you go to Ottawa's second convention?

24 A. To support Ottawa.

25 Q. Why did you feel the need to support Ottawa?

1 A. Because they had had a second convention. They needed to have  
2 a second convention, so I went there to see the process.

3 Q. Were you -- so who was the -- do you recall the group that  
4 forced a second convention?

5 A. No, I do not know.

6 Q. Were you there then -- so what was the issue, do you recall,  
7 as to why --

8 A. No, I do not.

9 Q. You've got to wait until I'm done asking the question.

10 A. Okay.

11 Q. Do you recall what the issue was as to why Ottawa had to have  
12 a second convention?

13 A. No, I do not.

14 Q. So you said you were there to support Joel Studebaker. I'm  
15 curious why you felt the need to support him.

16 A. No, I did not say that.

17 Q. Okay.

18 A. I said I met Joel in passing there. I did not know Joel.

19 Q. Okay. So you just -- you're testifying today under oath  
20 that you went to the Ottawa second convention strictly to  
21 observe?

22 A. You got it.

23 Q. How many times -- so you met Joel in passing at the Ottawa  
24 second convention. Did you develop a relationship with Joel  
25 after that second convention?

- 1 A. No.
- 2 Q. Have you talked to Joel Studebaker on the telephone after that  
3 second convention?
- 4 A. For District 4, yes.
- 5 Q. What did you talk to Joel Studebaker about regarding  
6 District 4?
- 7 A. I asked for his brother's telephone number after our first  
8 meeting.
- 9 Q. Why did you want his brother's telephone number?
- 10 A. Because he's on District 4.
- 11 Q. What does he do on District 4?
- 12 A. He's a member of District 4.
- 13 Q. When you say he's a member, what does someone have to do to be  
14 a member of District 4?
- 15 A. He was elected as a member of District 4.
- 16 Q. Are you saying he's on the District 4 Executive Committee?
- 17 A. Yes, I am.
- 18 Q. Why did you want to talk to his brother?
- 19 A. I had a question.
- 20 Q. What question did you have?
- 21 A. If he wanted to work on a committee and I don't remember which  
22 committee.
- 23 Q. You asked his brother if he wanted to work on a committee?
- 24 A. Yes.
- 25 Q. Was this telephone call after you were elected as vice chair

1 or before?

2 A. After.

3 Q. Is that the -- so following the August -- following the Ottawa  
4 second convention, how many times have you talked to Joel  
5 Studebaker?

6 A. I don't know.

7 Q. More than one?

8 A. Could be two. Could be three. I don't know.

9 Q. Do you recall -- other than you asking for his brother's  
10 telephone number -- what the other topics of conversation  
11 were?

12 A. No, I do not.

13 Q. When did you first meet Ken Beyer?

14 A. Actually, I met Ken in passing at that same convention.

15 Q. The Ottawa second convention?

16 A. Yes.

17 Q. Did you develop a relationship with Ken after that Ottawa  
18 second convention?

19 A. Only after I decided to run for vice chair.

20 Q. Did you know Ken was running for chair before you announced  
21 that you were running for vice chair?

22 A. Yes, I did.

23 Q. Did you have any conversation with Ken to discuss that you  
24 were running for vice chair?

25 A. I sent him a message saying that I would run for vice chair.

- 1 Q. Have you produced that message?
- 2 A. I don't have it.
- 3 Q. Why don't you have it?
- 4 A. My phone space locked up on me. I don't have it.
- 5 Q. What do you mean your phone space locked up?
- 6 A. It kept telling me that I was out of space. I had too much  
7 stuff on my phone.
- 8 Q. After you contacted Ken regarding running for vice chair, did  
9 you have further conversations with Ken Beyer?
- 10 A. We did a video together.
- 11 Q. Did you and Ken discuss your vision for District 4?
- 12 A. Our vision?
- 13 Q. Did you have a platform or a vision for District 4?
- 14 A. To represent the people. That's all I remember.
- 15 Q. Did you also talk with Ken Beyer about the idea that as  
16 district chair -- District 4 chair and vice chair you would --  
17 you wanted to be able to pick, hand-pick the county chairs?
- 18 A. Never.
- 19 Q. Did Ken Beyer ever express that view to you?
- 20 A. Never.
- 21 Q. Did you -- did you or Ken Beyer state in a text message that  
22 you did not want that view to be put in bylaws, but you would  
23 do it through policy and procedure?
- 24 A. What are you talking about?
- 25 Q. I'm talking about the fact that you and Ken Beyer had a plan

1 to hand-pick county chairs without delegate representation.

2 A. That would be a no, we did not.

3 Q. So you're saying that is false?

4 A. That is false.

5 Q. You're testifying under oath that you and Ken Beyer never had  
6 that conversation?

7 MR. THOMAS: Objection, asked and answered. She  
8 already answered the question.

9 THE WITNESS: We never had a conversation about  
10 picking county chairs, no.

11 BY MR. DePERNO:

12 Q. Have you voted or participated in any official matters with  
13 the 4th District Committee since receiving your notice that  
14 you are no longer a precinct delegate in Kalamazoo?

15 MR. THOMAS: Can you repeat that question?

16 BY MR. DePERNO:

17 Q. Have you voted or participated in any official matters with  
18 the 4th District since receiving your notice that you are no  
19 longer a Kalamazoo County precinct delegate?

20 A. The unlawful notice I received? Is that the one you're  
21 talking about? Because I've not received a lawful notice.

22 Q. I'm waiting for an answer to my question.

23 A. An unlawful notice or a lawful notice?

24 Q. Should I repeat the question again or are you refusing to  
25 answer?

1 A. I received an unlawful notice and, yes, I have participated  
2 with votes in District 4.

3 Q. When you were an ex officio member of the Kalamazoo County  
4 Republican Committee Executive Committee, did you record  
5 meetings?

6 A. Meetings were allowed to be recorded until after  
7 February 17th when the fort was built at Kalamazoo Republican  
8 Committee.

9 (Clarification question by Reporter.)

10 THE WITNESS: Kalamazoo County Republican, KGOP.

11 BY MR. DePERNO:

12 Q. I'll ask the question again. Did you record Executive  
13 Committee meetings when you were an ex officio member of the  
14 Kalamazoo County Republican Committee?

15 A. Yes, meetings were allowed to be recorded there.

16 Q. Did you post those recordings in social media channels?

17 A. I might have posted a couple.

18 Q. Why did you post meetings on social media channels?

19 A. Because I could.

20 Q. Do you believe it's proper to record Executive Committee  
21 meetings and then post them on social media channels?

22 A. Conjecture, proper.

23 Q. Are you refusing to answer the question?

24 A. What do you mean by proper? Because KGOP posts them all the  
25 time. So if that is proper, then yes, it is proper.

1 Q. Okay. Are you an operative for the Democratic party?

2 A. No, I'm not.

3 Q. Then why would you post private Executive Committee meetings  
4 on social media channels?

5 A. KGOP posts them. It is a public organization as far as  
6 memberships are public.

7 Q. When did you first start to train with Kim Harris who was a  
8 self-described precinct delegate captain?

9 A. Self-described? I've been to meetings.

10 Q. You've been to Kim Harris's meetings?

11 A. Actually, KGOP had people go through Kim Harris for training.

12 Q. When did you first start to train with Kim Harris who is a  
13 self-described --

14 A. I don't remember.

15 Q. We just have to get to the point of you answering the  
16 questions. Were you a member of the Kalamazoo County  
17 Republican Committee before you were a precinct delegate?

18 A. Yes.

19 Q. When did you become a member of the Kalamazoo County  
20 Republican Committee?

21 A. Actually, I gave my membership paperwork to Tony Lorentz who  
22 lost it, so I don't know what happened to it at that point,  
23 but that was in, I believe, July of 2022.

24 (Exhibit 5 marked for identification.)

25

1 BY MR. DePERNO:

2 Q. This is Exhibit 5. These are training materials presented by  
3 Kim Harris. Have you seen this e-mail before?

4 A. I don't recall.

5 Q. You don't recall seeing this attached to any documents in this  
6 case?

7 A. I answered. I don't recall.

8 Q. Have you reviewed the documents filed in this case?

9 A. Well, attached to this case, yes, I have.

10 Q. So do you recall seeing that e-mail?

11 A. Attached to this case, yes.

12 Q. This material states, "We are attempting to build a Precinct  
13 Delegate force across our state to remove all RINOs and their  
14 useless pawns from party leadership at the county, district  
15 and state committee levels." Do you agree with that  
16 statement?

17 A. Do you agree with that statement? Because you ran on it,  
18 stormed the conventions and get rid of RINOs. So you actually  
19 agree with that statement. I did not make that statement.

20 Q. I'm asking if you agree with that statement.

21 MR. THOMAS: Objection. She just answered the  
22 question.

23 MR. DePERNO: She didn't answer the question at all.  
24 The question is does she agree with it.

25 THE WITNESS: Actually, you agree with that

1 statement. You ran on that.

2 BY MR. DePERNO:

3 Q. Do you agree with that statement?

4 A. I didn't make the statement. So I don't know about useless  
5 pawns and the RINOs.

6 Q. So is your answer a yes or no? Do you agree with it or not?

7 A. If they're useless, yes.

8 MR. DePERNO: Okay. So you do agree with it. Very  
9 good.

10 MR. THOMAS: She said if they're useless.

11 THE WITNESS: If they're useless.

12 MR. THOMAS: Don't put words in her mouth, please.

13 BY MR. DePERNO:

14 Q. So you're not answering the question?

15 A. I said if they're useless. Yes, I answered the question.

16 Q. So what would you consider someone to be a useless pawn?

17 A. You.

18 Q. Me?

19 A. Yeah, you've been useless.

20 Q. Okay. So your definition of a useless pawn is me?

21 A. Yeah, you ran on this.

22 Q. Okay. I did not run on this, but nevertheless. So your  
23 definition of a useless pawn is --

24 MR. THOMAS: Objection. She's asked [sic] and  
25 answered that question three times now. You don't like the

1 answer.

2 BY MR. DePERNO:

3 Q. Your goal here is to attack me as the attorney for the county  
4 party and describe me --

5 MR. THOMAS: No, objection, describe you as a  
6 defendant in this case, Matt. You're a defendant in this  
7 case. You are a member of the KGOPEC, meaning that you are a  
8 defendant with the rest of the KGOPEC, and you're acting as  
9 the attorney for the rest of the defendants. So you are the  
10 one that are the defendant in this case.

11 MR. DePERNO: Well, okay, Jimmy.

12 MR. THOMAS: Well, prove me wrong. Tell me I'm  
13 wrong. Am I wrong? Put it on the record. Am I wrong?

14 MR. DePERNO: You are very wrong. You're wrong  
15 about a lot of things.

16 MR. THOMAS: Well, I am wrong about a lot of things,  
17 but you are, too.

18 MR. DePERNO: Thank you very much.

19 BY MR. DePERNO:

20 Q. Can you think of any other people who are useless pawns?

21 A. No.

22 Q. So as a precinct delegate you would agree that your only goal  
23 is to remove RINOs such as myself and me being the only one.

24 Is that your position?

25 A. Conjecture. I answered that question earlier and I actually

1       said I need to look at all the duties of the delegates. You  
2       just answered that question in a totally different way.  
3 Q.     Turn to the next page, it states -- this talks about using  
4       weapons of war and stating that "We are in a War," correct?  
5 A.     We are in a spiritual war. I agree with that.  
6 Q.     What type of spiritual war are we in?  
7 A.     Revelations talks about it. You can go read it.  
8 Q.     So you believe we are in Revelations right now?  
9 A.     I believe we are in a spiritual war, yes.  
10 Q.    Can you describe the spiritual war to me?  
11 A.    No.  
12 Q.    So how do you know we're in a spiritual war?  
13 A.    I feel it.  
14 Q.    You feel it?  
15 A.    Yes. There, my answer.  
16 Q.    So what you do and how you act is based on how you feel --  
17 A.    I said that.  
18 Q.    -- and you believe you are in a spiritual war because you feel  
19       it?  
20 A.    I answered the question.  
21 Q.    Okay. But you don't want to describe further as to what that  
22       spiritual war is?  
23 A.    No.  
24 Q.    What are weapons of war and how should we use them?  
25 A.    I don't know.

1 Q. The next page says, "Your elected position as a Delegate is  
2 much more than stuffing candidate literature bags and knocking  
3 on doors. Arm yourself with the knowledge of Roberts Rules of  
4 Order, State Party, and Election Laws to speak truth to power  
5 and begin to restore your County Party." Do you agree with  
6 that statement?

7 MR. THOMAS: Is this being read off of an exhibit?

8 MR. DePERNO: It is.

9 MR. THOMAS: Is it at the bottom of this?

10 MR. DePERNO: It's page 3.

11 THE WITNESS: It's JD's stuff.

12 MR. THOMAS: Where is it at? Point to me where --

13 THE WITNESS: No, not that page.

14 MR. DePERNO: Page 3 at the top.

15 MS. HARRIS: Not that page, Sabrina. Flip back.

16 MR. THOMAS: You're going to have to repeat the  
17 question, Matt.

18 BY MR. DePERNO:

19 Q. At the top of page 3 this states, "Your elected position as a  
20 Delegate is much much more than stuffing candidate literature  
21 bags and knocking on doors. Arm yourself with the knowledge  
22 of Roberts Rules of Order, State Party and Election Laws to  
23 speak truth to power and begin to restore your County Party."  
24 Do you agree with that statement?

25 A. You agree with it, too, because you were endorsed by JD who

1 wrote this. And, yes, we should arm ourselves with knowledge.  
2 So, yes, I agree we should arm ourselves with knowledge, we  
3 should know Roberts Rules of Order, we should know State Party  
4 and Election Laws, and we should speak the truth. I agree  
5 with that portion of that statement.

6 Q. The statement further states, "to restore your County Party."  
7 Restore your County Party to what?

8 A. Didn't I just answer the portion that I agree with? If the  
9 party -- I agree with we need to know Roberts Rules of Order,  
10 State Party, Election Laws, and speak the truth to power. Now  
11 restore your county to what, I don't know.

12 Q. What is an America First Republican precinct delegate?

13 A. It means we care about America first.

14 Q. Does it mean anything else to you?

15 A. Nope.

16 Q. When did you first meet Kim Harris?

17 A. I don't know the date.

18 Q. How is it that you and Kim Harris decided to be plaintiffs  
19 together in this lawsuit?

20 A. After being defamed by Kelly Sackett and the KGOPEC, after  
21 sending a demand letter to Kelly Sackett, you, and the other  
22 EC members with no response, and in that demand letter it  
23 stated that if we did not receive a response that there would  
24 be a lawsuit.

25 Q. Why are just you and Kim Harris the plaintiffs in this case?

1 A. Because we chose.

2 Q. Do you know Michael Labadie?

3 A. No, I do not.

4 Q. Is Kim Harris the precinct delegate captain for Kalamazoo?

5 A. Kim Harris is the precinct delegate captain for Kalamazoo,  
6 yes.

7 Q. How did she take on that title? Do you have any idea?

8 A. No.

9 Q. Do you report to her?

10 A. I don't report to anyone.

11 Q. Are you one of Kim Harris's lieutenants?

12 A. What the heck is that?

13 Q. I'll take that as a no or a yes. I don't know what it is.

14 A. No, because I've never heard of a lieutenant and neither has  
15 Kelly Sackett, nor you.

16 Q. How would you describe a RINO?

17 A. Republican In Name Only. That's the definition.

18 Q. What does that mean to you?

19 A. It means that you're a Republican in name only, that you do  
20 not uphold the party platform.

21 Q. What is the party platform?

22 A. You can read it. Well, it's several pages here and I put it  
23 in my discovery. It's too much to put out. So if you want me  
24 to take the time and read the whole thing, we can do that now,  
25 too.

1 Q. Well, can you highlight any things that are important to you  
2 on the Republican --

3 A. We can read the whole thing. Here it is right here. What  
4 page would you like to start on?

5 Q. I'm asking you what is the Republican party platform?

6 A. Okay. How long do we have? We can read it.

7 MR. THOMAS: Go ahead and read it. Read it all into  
8 the record. I'm going to go use the bathroom.

9 THE WITNESS: Okay.

10 MR. DePERNO: She can take as long as she wants.

11 THE WITNESS: Okay.

12 MR. DePERNO: I was hoping she --

13 THE WITNESS: So restoring the American dream,  
14 rebuilding the economy and creating jobs. We are the party of  
15 a growing economy that gives everyone a chance in life and  
16 opportunity to learn, work, and realize the prosperity freedom  
17 makes possible. Government cannot create prosperity, though  
18 government can limit or destroy it. Prosperity is a product  
19 of self discipline, enterprise, saving and investment by  
20 individuals, but is not an end in itself. Prosperity provides  
21 the means by which citizens and families can maintain their  
22 independence from government, raise their children by their  
23 own values, practice their faith, and build communities of  
24 cooperation and mutual respect. It is also --

25

1 BY MR. DePERNO:

2 Q. Okay. I'm going to interrupt you. I'm happy to enter that as  
3 an exhibit rather than having you read the entire thing.

4 A. Well, I gave it to you.

5 Q. I mean, how many pages are you going to read?

6 A. You asked me about the platform. I'm going to read it all to  
7 you.

8 Q. No. I asked you what your understanding of the platform is.

9 A. Okay. I would need to read it all. We can read it all now.

10 Q. Well, it's many, many pages. You're just -- you are  
11 intentionally trying to be a difficult witness --

12 A. Okay.

13 Q. -- right now.

14 A. Do you want me to read this or not?

15 Q. I don't want you to read it.

16 A. Okay.

17 Q. I want to -- let's enter it as an exhibit.

18 A. Okay.

19 Q. If you would be willing to do that so that --

20 A. Well, it's already in. You have all my documents.

21 Q. I don't have it as an exhibit here today, so we'll --

22 A. Why not? You asked a question and you didn't bring the  
23 document?

24 MR. DePERNO: Can we go off the record? Jimmy,  
25 let's talk.

1 (Recess taken from 10:01 a.m. until 10:36 a.m.)

2 (Mr. Coss joins deposition.)

3 BY MR. DePERNO:

4 Q. Back on the record. We're back on the record, the attorneys  
5 having had a discussion off the record. The question I had  
6 asked was what is -- what is your understanding of the primary  
7 points of the Republican party platform?

8 A. Actually, I agree with all the bullet points; rebuilding  
9 economy and creating jobs, fair and simple taxes for growth,  
10 our tax principles, trade policies, a competitive America,  
11 free and financial markets, responsible home ownership and  
12 rental opportunities, America on the move, building a future  
13 America's electric grid, start-up Century [sic] small  
14 businesses and entrepreneurship.

15 (Clarification question by Reporter.)

16 THE WITNESS: Start-up small businesses and  
17 entrepreneurship, workplace freedom for 21st Century  
18 workforce, federal reserve, reducing the federal debt, a  
19 federal workforce serving the people. And we the people, the  
20 First Amendment religious liberty, I believe in that, and the  
21 Second Amendment, our right to keep and bear arms, the Fourth  
22 Amendment, our liberty and privacy, the Fifth Amendment,  
23 protecting human life, the Fifth Amendment, protecting private  
24 property, that's -- so, yeah. The Tenth Amendment, federalism  
25 and the foundation of personal liberty, and the Ninth

1 Amendment, the people's retained right, and also education.

2 BY MR. DePERNO:

3 Q. Kelly Sackett and Charley Coss were elected to the Kalamazoo  
4 County Republican committee leadership in December, is that  
5 correct?

6 A. Yes.

7 Q. Did you run against Kelly Sackett for the chair position?

8 A. Yes.

9 Q. And Kelly Sackett won, is that correct?

10 A. Yes.

11 Q. Did you start planning to remove Kelly Sackett and Charley  
12 Coss shortly after that December election?

13 A. No.

14 Q. Did you have any discussion with anyone about the removal of  
15 Kelly Sackett and Charley Coss after that December election?

16 A. After February 17th?

17 Q. After December, after the December election.

18 A. Between what dates?

19 Q. Well, let's start with between the day of the election in  
20 December and February 17th.

21 A. No.

22 Q. Did you have a discussion with anyone about removing Kelly  
23 Sackett as the chair of the Kalamazoo County Republican  
24 Committee after February 17th?

25 A. Yes.

1 Q. Who?

2 A. I had a discussion with Kim and other delegates and I don't  
3 remember everyone.

4 Q. Why did you start having discussions with people to remove  
5 Kelly Sackett after February 17th?

6 A. Because of the defamation that was happening by Kelly Sackett  
7 and the KGOPEC, the unanswering of our demand letter, the  
8 unlawful notices that were sent to us, and the tyrannical  
9 behavior.

10 Q. Did you recruit William Bennett to run for district for  
11 secretary?

12 A. I don't recall recruiting him for secretary.

13 Q. Do you believe delegates are beholden to a political party?

14 A. Okay. Beholden -- the definition of beholden means that we  
15 are owed something based on something that was given to us.  
16 The Republican party does not give us anything. So,  
17 therefore, we are not beholden to the Republican party.  
18 We don't owe anything to the Republican party. We owe  
19 things -- we owe to the representation that we have in our  
20 communities.

21 Q. When you -- when you file the affidavit of candidacy to be  
22 a delegate, are you required to select whether you're a  
23 Republican or Democrat?

24 A. I'm a Republican.

25 Q. And did you select Republican on your form?

1 A. Yes.

2 Q. If you're not beholden to the political party, who are you  
3 representing within your precinct?

4 A. That's not the definition of beholding. I represent the  
5 Republican party.

6 Q. You ran for District 4 vice chair for the February 17th  
7 district caucus, correct?

8 A. Yes.

9 Q. What is the process that you had to go through in order to get  
10 elected to that position?

11 A. I was voted in.

12 Q. And the process is -- is that a -- do you receive an initial  
13 county vote at the county level?

14 A. No.

15 Q. Is your name just put in for district-wide election?

16 A. Anyone can run.

17 Q. What I'm asking is, is the process that you would be -- you  
18 would announce your candidacy on the floor of the district?

19 A. You can run -- you can if you want to. You can be nominated  
20 on the floor. There is no rule that says you cannot be  
21 nominated on the floor. Someone can be nominated on the floor  
22 at district.

23 Q. And was that your process?

24 A. That was not my process, but you can be nominated on the  
25 floor.

- 1 Q. So what was your process?
- 2 A. I decided to run for vice chair.
- 3 Q. So at some point you announced that you would be running,  
4 correct?
- 5 A. Yes.
- 6 Q. Did you have to fill out a form?
- 7 A. No, there is no form.
- 8 Q. So how was your name placed on a ballot if you didn't fill out  
9 a form?
- 10 A. As far as I know my name was not placed -- well, I don't know  
11 about a form. I didn't fill out any form. There was no form  
12 to fill out.
- 13 Q. Was there a person that made a motion for your nomination at  
14 the District 4 caucus?
- 15 A. Someone did. I don't know who did it.
- 16 Q. Who did you travel to the state convention with on  
17 February 17th?
- 18 A. Kim Harris, Emily Crawford, and Christine Augustine.  
19 (Exhibit 6 marked for identification.)
- 20 BY MR. DePERNO:
- 21 Q. I'm handing you Exhibit 6.
- 22 A. Uh-huh.
- 23 Q. The first page is the 4th District Caucus Agenda.
- 24 A. Uh-huh.
- 25 Q. And the next two pages are the 4th District Committee Rules

1 and Procedures.

2 A. Yes.

3 Q. Page 3 paragraph 9 is titled "Nomination Process for State (6)  
4 and District (15) Committee openings."

5 A. Page 3. Okay.

6 Q. Explain to me your understanding of Rule 9.

7 A. "Each County will caucus and its voting delegates shall elect  
8 the nominees for each State & District position assigned to  
9 said county, as available ..." "County chairs will announce  
10 their nominees to the District delegation at large. The  
11 District delegation shall accept as final, each counties  
12 nominees. If a County does not fill all of their allotted  
13 nominees for State and District seats, those empty seats,  
14 lacking a county nominated representative, shall be filled by  
15 the District Delegation. The District shall hold nominations  
16 and vote to fill those unfilled seats. The county shall have  
17 the right to reject any nominees they feel will not represent  
18 their county properly." So that is what it says.

19 Q. Was there something about Rule 9 that you did not like?

20 A. Well, all rules are only -- rules are a consideration to the  
21 body. That's all it is. The rules are presented to the body  
22 for consideration and --

23 Q. I'm sorry. Go ahead.

24 A. Thomas Balch, who was the state chair for that evening,  
25 actually came in and struck part of this rule after, which

1 was, "The District delegation shall accept as final, each  
2 counties nominees." He said it was illegal and in violation  
3 of state party rules.

4 MR. THOMAS: Which part of the rules is that, just  
5 for clarification?

6 THE WITNESS: This part right here, "The District  
7 delegation shall accept as final, each counties nominees."

8 MR. THOMAS: So the second paragraph of Rule 9?

9 THE WITNESS: Yeah, he struck that.

10 MR. THOMAS: Just for the record, I'm just  
11 clarifying it's the second paragraph of the rule.

12 THE WITNESS: Yeah.

13 MR. THOMAS: And Thomas Balch said that?

14 THE WITNESS: Uh-huh. Yes, this is Thomas Balch.

15 MR. DePERNO: Let's go off the record.

16 (Discussions off the record.)

17 MR. DePERNO: Let's go back on.

18 BY MR. DePERNO:

19 Q. Were you aware that all of the county chairs agreed to these  
20 rules prior to the February convention?

21 A. I'm aware that that does not matter because even a rules  
22 committee can only put forth rules for consideration. They  
23 are not binding rules. They can be changed. There's a  
24 hierarchy of rules.

25 Q. Were you involved in the preparation of these rules?

- 1 A. I wasn't on the rules committee, no.
- 2 Q. Did you have any input when these rules were being drafted?
- 3 A. No.
- 4 Q. Did you have any discussion prior to these rules being --  
5 prior to February 17th with Joel Studebaker about these  
6 rules?
- 7 A. We just knew that rules were coming out. We didn't know what  
8 the rules were going to be. Kelly Sackett sent rules on  
9 February 13th.
- 10 Q. So on February 13th you were able to see the proposed rules?
- 11 A. I was able to see part of the -- they changed from between  
12 February 13th and February 17th.
- 13 Q. Okay. This Rule 9 has four paragraphs in it.
- 14 A. Uh-huh.
- 15 Q. Was there a particular paragraph in this Rule 9 that you found  
16 offensive?
- 17 A. Offensive?
- 18 Q. That you didn't like.
- 19 A. Rules, once again, are only put forth as consideration. We  
20 have an opportunity to change it. I did not like the fact  
21 that "The District delegation shall accept as final, each  
22 counties nominees," which was stricken by Thomas Balch at  
23 convention.
- 24 Q. So is that the first paragraph that you're talking about?
- 25 A. That is the second paragraph.

1 Q. Why didn't you like the second paragraph?

2 A. Because the district is there as a district. The district has  
3 an opportunity to look at rules and amend rules. Counties do  
4 not run the district. The district body -- otherwise, the  
5 district body has no reason to show up. The district body is  
6 there to elect people for the district, not to just take a  
7 blanket, "We accept all rules." We can amend them.

8 Q. When did you come up with the plan to set aside Rule 9 at the  
9 February 17th caucus?

10 A. February 17th at convention.

11 Q. If I recall, the February 17th caucus started in the evening,  
12 is that correct?

13 A. Yes.

14 Q. Is it your testimony that you showed up in the evening with no  
15 plan to set aside Rule 9?

16 A. That is my testimony. There was no plan to set aside Rule 9  
17 when we got to the convention.

18 Q. Have you ever made the statement to somebody that your plan  
19 worked perfectly on February 17th?

20 A. I don't recall making that statement.

21 Q. Were you aware on February 17th that delegates from Ottawa  
22 County and other counties were going to support the motion to  
23 set aside Rule 9 for Kalamazoo County?

24 A. No.

25 Q. When you -- when the caucus started, who made the motion to

1 set aside Rule 9?

2 A. William Bennett.

3 Q. Did you ask William Bennett to make that motion?

4 A. William Bennett was asked to make any type of motion, first  
5 motion, so we didn't know what the rules were going to be  
6 until we got to convention. So, therefore, there was no coup  
7 d'etat as you have said.

8 Q. So I don't understand what you just said. You seem to have  
9 contradicted yourself. You knew what the rules --

10 MR. THOMAS: Objection. Matt, you can't put words  
11 into her mouth that she contradicted herself. If you have  
12 something specific that you think was inconsistent, you can  
13 follow up on that question, but don't put words into her  
14 mouth, please.

15 BY MR. DePERNO:

16 Q. You had stated that you had saw the rules prior to the  
17 February 17th convention, but then you just stated you didn't  
18 know what the rules were going to be.

19 A. I stated that on February 13th Kelly Sackett sent out rules.  
20 The rules changed between February 13th and February 17th.  
21 That is exactly what I stated.

22 Q. And you read these rules before the February 17th caucus,  
23 correct?

24 A. We got rules on -- the final rules came on February 17th  
25 and, yes, I did review them.

1 Q. So you knew prior to the caucus what the rules looked like?  
2 A. Yes. Any delegate would be smart to read the rules.  
3 Q. So the -- I had asked the question, which I don't believe I  
4 got an answer to, did you ask William Bennett to make the  
5 motion to set aside Rule 9?  
6 A. We asked William Bennett at convention to make a motion. That  
7 happened at convention.  
8 Q. And what motion did you ask William Bennett to make?  
9 A. The motion he made.  
10 Q. Why did you want Bill Bennett to make the motion rather than,  
11 say, for instance, you make the motion?  
12 A. Because we asked him. Because we decided that we wanted to  
13 ask him, period.  
14 Q. So why didn't you make the motion?  
15 A. Because I didn't.  
16 Q. And why did you want Bill Bennett to make the motion?  
17 A. Because of his presence as a man.  
18 Q. Why does being a man make a difference?  
19 A. Just stature. So we asked him to make it and he did.  
20 Q. Are you suggesting that men have greater stature than women?  
21 A. Sometimes.  
22 Q. And in this context you believe that a man had greater stature  
23 than a woman?  
24 A. We asked him to make the motion and I've already answered  
25 that.

1 Q. With the rules as presented in this document, Rule 9, what  
2 were you -- was there something you were afraid of that was  
3 going to happen?

4 A. I was not afraid of anything.

5 Q. Well, the motion that Bill Bennett made stated that he was  
6 afraid. So when you asked him to make the motion, did you  
7 provide the language to him about the motion?

8 A. No.

9 Q. Did you believe the county chair of Kalamazoo County had the  
10 power to select the nominee to the district delegation?

11 A. No.

12 Q. So if Kalamazoo went into a caucus, multiple people could have  
13 been nominated, correct?

14 A. Multiple people were nominated on the floor.

15 Q. That's not the question I asked.

16 A. Multiple people were nominated. You can nominate people in a  
17 caucus or you can nominate them on the floor.

18 Q. If Kalamazoo County went into a caucus, multiple people could  
19 have been nominated within the Kalamazoo County caucus?

20 A. They could have been.

21 Q. And then the Kalamazoo County delegates would have had the  
22 opportunity to vote on multiple nominees within the caucus,  
23 correct?

24 A. Actually, they had it on the floor, also.

25 Q. Again, not the question I asked. Within the Kalamazoo County

1 caucus, if Kalamazoo County went into caucus, multiple people  
2 could have been nominated and the Kalamazoo County delegates  
3 would have had the opportunity to vote on multiple nominees,  
4 correct?

5 A. You say would have as if they didn't later. They had the  
6 opportunity to vote on the floor or in caucus.

7 Q. Well, they didn't have the opportunity to vote in caucus  
8 because that was taken from them.

9 A. Either way they had a vote, on the floor or in caucus.

10 Q. Okay. Is there a reason you're refusing to answer this  
11 question?

12 MR. THOMAS: Objection. She said in caucus and/or  
13 on the floor. She answered your question. She answered it  
14 twice, in fact. You've asked it twice. She gave you the same  
15 response both times.

16 BY MR. DePERNO:

17 Q. What did you hope to accomplish by making the motion to  
18 exclude Kalamazoo County delegates from Rule 9 on  
19 February 17th, 2023?

20 A. There was no process of saying exclude Kalamazoo delegates  
21 from Rule 9. You are putting that in your mouth and saying it  
22 as if we said it and we never said it.

23 Q. Do you agree that setting aside Rule 9 as to Kalamazoo County  
24 took away the vote of Kalamazoo County delegates to vote on  
25 their nominee in caucus?

1 A. I did not take away the votes or we did not take away the  
2 votes of Kalamazoo nominees. You're trying to push a  
3 narrative that is not there. They had a vote and the vote was  
4 on the floor.

5 Q. Did Ottawa County delegates have the opportunity to vote for  
6 their county delegate nominee in a separate Ottawa County  
7 caucus?

8 A. As far as I know Ottawa County didn't even caucus.

9 Q. Did Allegan County have the opportunity to select their  
10 nominee through a vote of their separate Allegan County  
11 delegates?

12 A. I like how you twisted that. Allegan County did not caucus,  
13 either. And actually on the floor when this was stricken  
14 right here, on this right here when Thomas Balch came in and  
15 he struck this, "The District delegation shall accept" --  
16 "The District delegation shall accept as final, each counties  
17 nominees," he said that that was illegal and in violation of  
18 the rules, that meant that even though Ottawa or Allegan did  
19 anything prior to that convention that those nominees did not  
20 have to be accepted. And Kenny Clevenger said at that point,  
21 "Oh, we'll just go along with what we did." That's what  
22 happened.

23 Q. Even if your concerns are valid, didn't Rule 9 protect all  
24 counties by allowing each individual county to caucus  
25 separately?

1 A. That's your opinion. Not mine.

2 Q. So is that a no or a yes?

3 A. That is -- you're putting words in my mouth. No, I did not  
4 say that. I'm saying I don't know what the law would have  
5 been related to that.

6 Q. Did you understand the vision -- I'm sorry. Did you  
7 understand the division which would occur by making a motion  
8 to set aside the Rule 9 of the District 4 rules?

9 A. No, because as a district we have an opportunity as delegates  
10 on the voting floor to make motions.

11 Q. Did you think there would be any division based on that  
12 motion?

13 A. We made a motion. No. Division would have been for people  
14 that maybe wanted somebody else or -- like, with any vote.

15 Q. Did you know that the motion to set aside Rule 9 would result  
16 in many of your fellow Kalamazoo County precinct delegates  
17 becoming angry when you supported that motion?

18 MR. THOMAS: I'm going to object. I mean, that's  
19 speculation. How does she know if people are going to get  
20 angry? Can you either reword the question or modify it  
21 or something?

22 BY MR. DePERNO:

23 Q. Did you anticipate that any of your fellow Kalamazoo County  
24 delegates would become angry when you supported the rule to  
25 set aside Rule 9?

1 A. I assumed that they would be civil because we were in a  
2 district meeting where delegates can make motions. They can  
3 be sacking [sic] it, there can be arguments, there can be  
4 objections, there can be a fort. So I assume that all  
5 delegates would be knowledgeable on the rules, on the bylaws,  
6 and the state party rules.

7 Q. Following the convention did you come to learn that, in fact,  
8 some of your fellow Kalamazoo County delegates were upset?

9 A. Charley Coss was on a chair screaming. Your wife was  
10 screaming back there. I wasn't there, though.

11 Q. I'm talking about following the February 17th caucus. Did you  
12 come to understand that some of your fellow delegates were  
13 upset?

14 A. Your wife was screaming. Charley Coss was on a chair  
15 screaming.

16 Q. I'm asking specifically following the February 17th  
17 convention.

18 A. Okay.

19 Q. Following February 17th. After February 18th did there come  
20 a point where you realized or understood that some of your  
21 fellow delegates were upset?

22 A. I understood that fellow delegates did not understand the  
23 rules. They had not been educated on the rules. Therefore,  
24 they did not understand the process. So there's winners and  
25 there's losers. If you lose, you've got to move on.

1 Q. Okay. You were removed from the -- as an ex officio member of  
2 the Kalamazoo County Executive Committee, correct?

3 A. I never got a letter to that effect.

4 Q. There was a vote taken, correct, to remove you?

5 A. No.

6 Q. You were removed as a Kalamazoo County delegate, correct?

7 A. As a Kalamazoo County delegate? By who?

8 Q. By the county party, correct?

9 A. By who?

10 Q. By the county party.

11 A. By Kelly Sackett?

12 Q. I'm not trying to be argumentative.

13 A. Okay.

14 Q. I'm trying to ask questions.

15 A. I received an unlawful letter from Kelly Sackett as from a  
16 delegate. She has no authority to remove me as a delegate.

17 I did not receive any vote or -- to remove me as an ex officio  
18 member. That is my answer.

19 Q. Sometimes you win and sometimes you lose and you just have to  
20 move on, correct?

21 A. Well, in a vote situation. In a delegate situation where  
22 you're on the floor and you have to take a vote, I lost to  
23 Kelly. Okay. I moved on. Even though she had someone stand  
24 up and say, "God said" do things.

25 (Clarification question by Reporter.)

1 THE WITNESS: "God said, 'Vote for Kelly Sackett.'"  
2 (Exhibit 7 marked for identification.)

3 BY MR. DePERNO:

4 Q. I'm handing you Exhibit 7, which is a letter prepared by your  
5 attorney, dated February 23, 2023.

6 MR. THOMAS: Before you ask questions with that,  
7 please don't ask any attorney-client privilege questions,  
8 Matt.

9 BY MR. DePERNO:

10 Q. Did you help prepare this letter?

11 A. I read it. It was prepared by my attorney.

12 Q. Did you have input into preparation of this letter?

13 A. I talked to him.

14 Q. The first paragraph deals with three precinct delegates  
15 becoming statutory seat holders for the Executive Committee.  
16 The letter says, "This is in violation of MCL 168.599," and  
17 states, "you do not have the authority under the KGOP By-Laws  
18 to override the statute." Is it your understanding that the  
19 statute of MCL 168.599 takes precedent over the bylaws?

20 A. That is not my understanding.

21 Q. Do you then disagree with this statement that says, "you do  
22 not have the authority under KGOP By-Laws to override the  
23 statute"?

24 A. The KGOP bylaws bind itself to the law and state rules.

25 Q. Who taught you that?

1 A. I know how to read.

2 MR. THOMAS: I want to object to this as  
3 argumentative. You want her to draw a legal conclusion, Matt.  
4 You know the argument here. The bylaws incorporate and  
5 ratified 168.599. It's that simple. So the judge is either  
6 going to agree with that or he doesn't.

7 BY MR. DePERNO:

8 Q. Why did you take issue with three precinct delegates becoming  
9 statutory seat holders for the Executive Committee?

10 A. It's in violation of the bylaws.

11 Q. You have the bylaws in front of you. Can you please point to  
12 a paragraph in the bylaws that support your statement?

13 MR. THOMAS: Where is that exhibit? It's right  
14 here.

15 THE WITNESS: Actually, I have the bylaws here, too.  
16 And it's under -- I think it's under "Vacancies," under 6 --  
17 is it 6? Let's see. Go to 6. Let me find mine and make sure  
18 it's the same.

19 MR. THOMAS: Here.

20 THE WITNESS: Okay. I've got it. I've got 6.  
21 What's the question again?

22 BY MR. DePERNO:

23 Q. The question was, point to the paragraph in the bylaws that  
24 supports your argument.

25 A. "The vacancy may only," "only," meaning no other way, "be

1 filled by the person who is the new Republican nominee for the  
2 office in question."

3 Q. What are you looking at?

4 A. "Vacancies," 6.

5 MR. THOMAS: 6A.

6 BY MR. DePERNO:

7 Q. Okay. Read exactly what you're referring to.

8 A. "The vacancy may only" --

9 MR. THOMAS: Read the -- just read the paragraph.

10 THE WITNESS: "If a vacancy occurs in the position  
11 of a Statutory Member of the Executive Committee and there is  
12 a special election held to fill the office, the vacancy may  
13 only be filled by the person who is the new Republican nominee  
14 for the office in question."

15 BY MR. DePERNO:

16 Q. Was there a special election held to fill the office?

17 A. No.

18 Q. Thank you. Any other paragraphs in these bylaws that support  
19 your argument?

20 A. In this paragraph right here?

21 Q. I'm asking you, is there any other paragraph in these bylaws  
22 that support your argument other than what you pointed to  
23 which was 6A?

24 A. Yeah. It cannot be filled by any person other than the new  
25 Republican nominee. And the fact that under "Purposes" --

1 MR. DePERNO: Okay. Just so we're clear, the  
2 attorney is pointing to the bylaws indicating how Sabrina  
3 Pritchett-Evans should answer.

4 MR. THOMAS: No, I'm not doing that. I'm just  
5 showing -- you were asking her where the rules are and I'm  
6 helping her with the rules.

7 THE WITNESS: And, actually, I answered that  
8 question to you earlier. I said that the bylaws bound the  
9 Kalamazoo Republican party to the state law. I answered that  
10 earlier.

11 BY MR. DePERNO:

12 Q. And what is it about the state law that you think was illegal?  
13 I think those have been your words.

14 A. I didn't say the state law was illegal. How could the state  
15 law be illegal? I didn't say that.

16 Q. What state statute are you referring to that are bound by the  
17 bylaws?

18 A. 168 -- well, actually, the bylaws actually bind itself to it.  
19 It says here, "This committee is established by law, section  
20 168.599 MCLA, and State Party Rules."

21 Q. What is a statutory member of the Executive Committee?

22 A. 168.599 tells you that. Do you have that as one of your  
23 exhibits?

24 MR. DePERNO: I don't know.

25 MR. THOMAS: Since she's asking for it, if you don't

1 have it, I can pull it up on my phone for her to look at if  
2 you don't mind.

3 MR. DePERNO: No, go ahead.

4 (Short pause.)

5 MR. THOMAS: I've got 168.599 up there. I'm going  
6 to let her to look at it.

7 BY MR. DePERNO:

8 Q. The question is, what is a statutory member of the Executive  
9 Committee?

10 A. It says here --

11 MR. THOMAS: Well, she alluded to 168.599, so you  
12 were inquiring as to what 168.599 is.

13 MR. DePERNO: I'm not inquiring. I'm asking the  
14 question.

15 MR. THOMAS: Well, do you need her to look at that  
16 or no?

17 MR. DePERNO: I don't need her to do anything. I  
18 asked the question, what is a statutory member --

19 THE WITNESS: A statutory member -- it's defined in  
20 168.599. So "County offices and state legislative offices for  
21 which candidates were nominated at the last two preceding fall  
22 primary elections." Those are statutory members.

23 BY MR. DePERNO:

24 Q. So what is a statutory member of the Executive Committee?

25 A. I just said that. It says here, "County offices and

1 legislative offices for which candidates were nominated at the  
2 last two preceding fall primary elections."

3 Q. Isn't that part of the bylaws, Article III, Section 3A?

4 A. Yes, because the bylaws bind itself to MCL 168.599.

5 Q. So do you have a -- so in your -- so your view of a statutory  
6 member is simply a person who ran for election for county and  
7 state legislative office in the fall election, correct?

8 A. That is what the law says and that is what the bylaws say.

9 Q. What is an elected member of the Executive Committee?

10 A. Elected member is those who are elected by the delegates at  
11 county convention to represent the delegates on Executive  
12 Committee.

13 Q. How many members are on the Executive Committee?

14 A. There's 18 on the Executive Committee. Well, there were.

15 Q. Only 18?

16 A. There were 18 -- oh, members total?

17 Q. Yes.

18 A. I don't know the total number.

19 Q. How many statutory members? According to what you're looking  
20 at, how many statutory members would be on the Executive  
21 Committee for Kalamazoo County?

22 A. At the time based on those numbers it doesn't matter whether  
23 or not they're serving their purpose or not. There were  
24 18 positions on the statutory based on those people who had  
25 won their nominations.

1 Q. And how many spaces for elected members?

2 A. Eighteen based on that number.

3 Q. Do you agree that the bylaws state that the number of  
4 statutory and elected shall be equal?

5 MR. THOMAS: I'm going to object for  
6 mischaracterization.

7 THE WITNESS: Well, I can --

8 MR. THOMAS: Are you asking about the bylaws or are  
9 you asking statutory?

10 BY MR. DePERNO:

11 Q. I'm asking, do you agree that the number of statutory members  
12 and elected members on the Executive Committee shall be  
13 equal?

14 A. No. I agree that there's a reading comprehension problem in  
15 this room related to that and it's coming from you.

16 Q. Why is there a reading comprehension problem?

17 A. Because that is not what it says.

18 Q. What does Article III, Section 3B state?

19 A. "A number of persons, equal to the number of candidates of the  
20 Party for election to county and state legislative office in  
21 Kalamazoo County, shall be selected by the precinct delegates  
22 to the Fall County Convention of the Party taking place in  
23 even-numbered years." So what this means is that the precinct  
24 delegates get to elect the number of positions that were  
25 available based on candidates that were nominated on county

1 and legislative offices. That's all that means.

2 Q. You don't believe that the word equal has any meaning then?

3 A. It does have a meaning. The meaning is, based on those  
4 candidates who were nominated -- you were not nominated,  
5 Matt -- that based on those candidates who were nominated, the  
6 delegates get to have a number based on that number, because  
7 you have to have some way to measure that and it was measured  
8 based on the nominees, the delegates get to pick those.

9 Q. So if there's 18 statutory members then there would be 18  
10 executive or elected members?

11 A. If there's 18 nominees, whether or not they serve or don't  
12 serve, the delegates get to pick 18 members.

13 Q. And what happens when a statutory member resigns?

14 A. Nothing. You can't fill it.

15 Q. Who taught you that?

16 A. I knew that.

17 Q. How did you know that?

18 A. Reading comprehension.

19 Q. Does it offend you that those three statutory seats were  
20 filled with delegates?

21 A. It offends me that the rules were not followed and there was a  
22 breach of fiduciary responsibility by not following the rules,  
23 which the bylaws say under here that you will follow.

24 Q. What does party history tell you about vacancies of statutory  
25 members on Executive Committees?

1 A. I have no party history regarding -- party in Kalamazoo  
2 County?

3 MR. THOMAS: Do you have a document or something for  
4 her, if you're getting that from a source or a legal source or  
5 a statute or rule or anything else that you may have?

6 BY MR. DePERNO:

7 Q. The question was, what does party -- what does history of  
8 the party say about filling statutory seats on Executive  
9 Committee?

10 MR. THOMAS: I'm going to object unless you're  
11 asking a specific question about history. If she doesn't know  
12 the history, then she doesn't know the history. But if you're  
13 alluding to something in the history, then you need to procure  
14 that.

15 MR. DePERNO: I believe she has the ability to  
16 answer because the question is pretty simple.

17 BY MR. DePERNO:

18 Q. What does the history of the party say about filling statutory  
19 seats on Executive Committees?

20 A. The KGOP bylaws say it is not done. I don't know any history  
21 other than that.

22 Q. Did you reach out and inquire with anyone within either the  
23 Kalamazoo County party or the state party regarding events in  
24 the past across the state where statutory seats may have been  
25 filled when they were vacated?

1 A. It is not my responsibility and from county to county I don't  
2 know what another county does. This is regarding KGOP bylaws,  
3 not another county's bylaws.

4 Q. Do you believe that the Kalamazoo County Republican Committee  
5 runs itself and polices itself from everything in how it  
6 chooses to run itself and how it composes itself?

7 A. I believe that the Kalamazoo County party has to go by its  
8 bylaws as it was established under. Otherwise, it's in  
9 violation of its laws of creation.

10 Q. Is there anything in -- well, I'm not going to ask that. Can  
11 there be nominations to fill the vacated seats of statutory  
12 members?

13 A. How many times are you going to ask me this, Matt? It is a  
14 violation of the bylaws.

15 Q. Can the Executive Committee designate a replacement nominee to  
16 fill a statutory seat?

17 A. Go back to this 6. Once again we've already been through  
18 this. "If a vacancy occurs in the position of a Statutory  
19 Member of the Executive Committee and there is a special  
20 election held to fill the office, the vacancy may only be  
21 filled by the person who is the new Republican nominee for the  
22 office in question."

23 Q. That literally has nothing to do with the question I asked.

24 MR. THOMAS: I'm going to object. She asked [sic]  
25 and answered that. That's her answer to your question. She

1 read that particular bylaw as her answer to your question.

2 BY MR. DePERNO:

3 Q. Do you know what a replacement nominee is?

4 A. You cannot replace statutory members unless they are put in  
5 the office through a special election, which the Kalamazoo  
6 County GOP cannot put people in county office, nor can they  
7 put people in legislative offices.

8 Q. Are political parties free to constitute their own rules  
9 without interference?

10 A. You have constitutional rules, the KGOP bylaws. There you go.  
11 Operate under them.

12 (Exhibit 8 marked for identification.)

13 BY MR. DePERNO:

14 Q. I'm going to hand you Exhibit 8. Exhibit 8 is a letter that  
15 was sent to you on March 3rd, 2023. Do you recognize this  
16 letter?

17 A. Yes, I do.

18 Q. At the end of this letter it states, "You will no longer  
19 be allowed to attend and or participate in any and all  
20 activities, enter any properties of, engage with, and or be  
21 involved in any way with the KGOP in future." Do you agree?

22 A. That is in violation of MCL 168.624.

23 Q. Do you agree that that's what the letter says at the bottom?

24 A. Yes, in violation of MCL 168.624.

25 Q. You stated earlier that you had not received any notification

1 that you were removed as an ex officio member.

2 A. This does not remove me as an ex officio member.

3 Q. Do you believe you're still an ex officio member?

4 A. According to the bylaws it says "shall be." You like that  
5 word.

6 (Clarification question by Reporter.)

7 THE WITNESS: I said he likes that word.

8 MR. THOMAS: Just for the record and clarification,  
9 where are you getting the "shall be" that --

10 THE WITNESS: In the bylaws.

11 MR. THOMAS: Because that's kind of confusing.

12 THE WITNESS: Yeah. So it's in the bylaws, under  
13 "3 - Membership." "The President or Chairman of any  
14 Republican Organization in Kalamazoo County shall be" --  
15 "shall be an ex-officio, nonvoting member of the Executive  
16 Committee. The committee may appoint other ex-officio members  
17 by majority vote. Ex-Officio members shall have a voice on  
18 the Executive Committee, but not a vote." That is under "3 -  
19 Membership," "C."

20 (Exhibit 9 marked for identification.)

21 BY MR. DePERNO:

22 Q. Let me hand you Exhibit 9. Is this an e-mail that you sent  
23 upon receiving that?

24 A. I sure did.

25 Q. So we've at least established that your prior testimony was

1 false?

2 MR. THOMAS: You need to allude to what you're  
3 talking about if you're going to make that kind of comment on  
4 the record.

5 BY MR. DePERNO:

6 Q. Okay. Let's go back to Exhibit 7, which is the letter.  
7 You make reference at the bottom of the letter to a text  
8 message on February 19, 2023?

9 A. Bottom of what letter?

10 Q. Page 1 on Exhibit 7.

11 A. Oh, Exhibit 7. What is Exhibit 7? Okay. We're moving around  
12 to different things. Hold on. Yes. Okay.

13 Q. Who did that text message smear?

14 A. Myself, Kim Harris, and other voting delegates.

15 Q. Did it mention you?

16 A. Actually, what it did is later on in the press releases it  
17 tied itself back to that press release.

18 Q. And is that text message your case for slander?

19 A. It is more than that text message. It is everything that  
20 happened after the press releases, it is the censures,  
21 everything that tied back to this text message.

22 Q. When you filed your lawsuit in this case, you brought a claim  
23 under the Elliott Larsen Act, correct?

24 A. It's moot.

25 MR. THOMAS: Objection, it's moot and she's not --

1 we're not going into that.

2 BY MR. DePERNO:

3 Q. I'm asking you. Did you file --

4 A. Moot.

5 MR. THOMAS: Objection. She's not going to answer  
6 it. It's moot. It's not relevant.

7 MR. DePERNO: It is relevant.

8 MR. THOMAS: It's not relevant. It's moot, it's  
9 moot. It's not part of this lawsuit.

10 MR. DePERNO: Well, of course it's part of the  
11 lawsuit.

12 MR. THOMAS: It's not part of the lawsuit.

13 BY MR. DePERNO:

14 Q. I mean, you can refuse to answer, but I'm going to ask my  
15 questions and you can say, "I'm not going to answer it."

16 A. Moot.

17 Q. What basis did you have to bring an Elliott Larsen claim?

18 A. Moot.

19 MR. THOMAS: Objection, it's moot. Move on to the  
20 next question.

21 BY MR. DePERNO:

22 Q. Do you know that you were not an employee of the Kalamazoo  
23 County Republican Party?

24 MR. THOMAS: Objection, it's moot. Move on to the  
25 next question.

1 BY MR. DePERNO:

2 Q. Do you know that your claim was completely frivolous in --

3 A. Moot.

4 MR. THOMAS: Objection. Move on to the next  
5 question.

6 BY MR. DePERNO:

7 Q. Please let me finish my question. You may not like the  
8 questions I'm asking, but I get to ask the questions.

9 Do you agree that your claim was entirely frivolous  
10 when you sued Kelly Sackett for a violation of Elliott Larsen,  
11 knowing that you were not an employee of the party?

12 A. Moot.

13 MR. THOMAS: Objection, it's moot. Move on to the  
14 next question.

15 BY MR. DePERNO:

16 Q. Who told you to file an Elliott Larsen claim?

17 A. Moot.

18 MR. THOMAS: Objection, it's moot and  
19 attorney-client privilege.

20 BY MR. DePERNO:

21 Q. Did you file the claim because you thought it was successful  
22 when you sued State Farm for racial discrimination, also?

23 A. Moot.

24 MR. THOMAS: Objection, it's moot.  
25

1 BY MR. DePERNO:

2 Q. You did sue State Farm for racial discrimination --

3 A. Which has nothing to do with this.

4 Q. You've got to let me finish asking the question. It does have  
5 something to do with this. You have a history of filing  
6 racial discrimination claims, correct?

7 A. No, incorrect.

8 Q. Did you think that the racial discrimination claim in this  
9 case would be beneficial to you in the fact that it would  
10 intimidate people?

11 MR. THOMAS: Objection.

12 THE WITNESS: Objection.

13 BY MR. DePERNO:

14 Q. Do you use your race as a weapon against other people?

15 A. Objection.

16 Q. I'll take an answer.

17 A. Objection.

18 Q. You can object, but it's a question that --

19 A. No, I do not.

20 Q. Was it successful for you in the State Farm case?

21 MR. THOMAS: Objection, it's a privileged  
22 settlement.

23 BY MR. DePERNO:

24 Q. How much money were you paid in the --

25 A. Privileged.

1 MR. THOMAS: Objection, it's privileged. It's a  
2 privileged settlement.

3 BY MR. DePERNO:

4 Q. You've got to wait until I'm finished asking the questions.  
5 Is that a confidential settlement agreement?

6 A. Yes.

7 Q. Were you paid money in that settlement?

8 MR. THOMAS: Objection, it's privileged.

9 BY MR. DePERNO:

10 Q. I'm not asking how much. I'm asking if you were paid money?

11 A. I can't talk about it.

12 Q. Do you have a copy of the settlement agreement with you?

13 A. No.

14 Q. You filed a motion in this case to amend your complaint to add  
15 a quo warranto claim. Why did you withdraw that motion to  
16 amend your complaint?

17 MR. THOMAS: I'm going to object in that it's  
18 attorney-client privilege for one and that still can be  
19 refiled and amended.

20 BY MR. DePERNO:

21 Q. Did you realize that after the response was filed that your  
22 motion to add a quo warranto claim was entirely frivolous?

23 MR. THOMAS: Objection. Again, it's attorney-client  
24 privilege.

25

1 BY MR. DePERNO:

2 Q. How is Kelly Sackett a state actor?

3 A. Kelly Sackett has put herself out there as a state actor by  
4 her meetings with Shardae, by her sending out notices to  
5 the county clerk's office, to the township clerk's office,  
6 sending out notices to 17 delegates that "By my authority you  
7 are no longer a precinct delegate," sending out an e-mail to  
8 Shardae saying, "If you need any help, let me know; we knew  
9 that this was going to happen, we're in unchartered waters."  
10 So she is acting as a state -- as a state -- what's the word?

11 MR. THOMAS: Actor.

12 THE WITNESS: -- state actor.

13 BY MR. DePERNO:

14 Q. You honestly believe in good faith that having a meeting with  
15 a Kalamazoo County clerk makes a person a state actor?

16 MR. THOMAS: Objection. You're characterizing --  
17 she just told you the other things, letters and her conduct in  
18 doing the letters and trying to dismiss delegates from their  
19 office on her authority alone. She just told you that. So  
20 it's asked and answered, Matt.

21 BY MR. DePERNO:

22 Q. Were you upset that nobody responded to your demand letter?

23 A. I wasn't upset, but it was a demand letter. And nobody --  
24 and at the end of the demand letter, that is also a breach of  
25 your fiduciary duty as sitting on that Executive Committee.

1 It is a breach of Kelly's fiduciary duty as being the chair of  
2 that committee, because on that letter it stated that we  
3 wanted you removed and the other two that were unlawfully put  
4 on as Executive Committee members and a retraction of the KGOP  
5 release of a press release to retract what they had stated.  
6 There was no response. There was no attempt to get with us to  
7 have a conversation with us. It was completely ignored. And  
8 at the end of that letter it said that if we did not receive a  
9 response that the KGOP would be sued.

10 Q. With the way you act and your hostility towards people and the  
11 way you use race as a weapon against people, why would you  
12 expect anyone --

13 MR. THOMAS: Object to the characterization of the  
14 question.

15 BY MR. DePERNO:

16 Q. -- why would you expect anyone to want to sit down and have  
17 that civil discussion with you?

18 A. Matt, you're putting words in my mouth.

19 MR. THOMAS: Objection to the characterization of  
20 your question, Matt. You know, you're putting those words in  
21 there and it's not right. It's not right.

22 BY MR. DePERNO:

23 Q. Do you agree that a county political party has a right to  
24 control its membership?

25 A. A county political party has a right to operate under its

1 bylaws.

2 Q. Do you agree that a county political party has a right to

3 control its membership?

4 A. I agree that a county party should operate under its bylaws.

5 Q. So you're not going to answer that question?

6 A. I answered that question.

7 Q. If a Democrat or third-party person runs as a delegate for the

8 Kalamazoo County Republican party, can the party do anything

9 about that?

10 A. Actually, I don't know because who's running? Did you run as

11 a Democrat, Matt?

12 Q. So your answer is "I don't know"?

13 A. Yeah. Did you run as a --

14 Q. Do you care about the issue of election integrity?

15 A. What's that got to do with this?

16 Q. Do you care about the issue --

17 A. Yes, I do care about the issue of election integrity.

18 Q. Do you believe that everyone is entitled to have a vote?

19 A. The law says that.

20 Q. Do you believe that everyone has a right to have a vote?

21 A. Everyone has a right to have a vote under the proper

22 circumstances.

23 Q. What are the proper circumstances?

24 A. Well, apparently if you're a felon and you're in prison you

25 don't have a right to vote, do you? So you said everyone.

1 Q. Do you think the county party has a right to punish or  
2 discipline people who act against the interest of the county  
3 party?

4 A. Well, if you're a tyrant and you just want things your way,  
5 no, I do not believe that.

6 Q. Do you agree that the votes of the Kalamazoo County delegates  
7 were diluted when you set aside Rule 9?

8 A. No.

9 Q. Were you at a meeting at Juliana's(ph) restaurant on or about  
10 February 22nd, maybe 23rd, where there were Republican county  
11 precinct delegates?

12 A. Yes.

13 Q. How did you react to people who voiced their concern that you  
14 stole their vote?

15 A. Their vote was not stolen.

16 Q. Did anyone at that meeting voice their position that their  
17 vote was stolen?

18 A. Everyone has a right to voice their position, but their vote  
19 was not stolen.

20 Q. The question is, did anyone at that meeting voice their  
21 concern that their vote was stolen?

22 A. I did not say those exact words.

23 MR. THOMAS: I'm going to object. She just asked  
24 [sic] and answered the --

25 MR. DePERNO: She did not --

1 MR. THOMAS: It's the same question. She answered  
2 it.

3 MR. DePERNO: She's not answering the questions.  
4 She's giving --

5 MR. THOMAS: Go ahead and answer that. Answer the  
6 question.

7 THE WITNESS: I do not recall those exact words, but  
8 everyone has a right to voice their opinion.

9 BY MR. DePERNO:

10 Q. Did you tell people that you had a plan and your plan worked  
11 perfectly?

12 A. I do not recall saying that.

13 Q. Does that sound like something you would say?

14 A. I do not recall saying that.

15 Q. Have you signed an affidavit as others have acknowledging that  
16 the set-aside motion was a mistake?

17 A. I didn't know people were signing affidavits.

18 Q. Have you offered to redo the caucus of the 39 delegates for  
19 the purpose of re-voting for the district Executive Committee  
20 and state committee seats?

21 A. No, because everything was done properly.

22 Q. Do you believe that the concerns of your fellow delegates are  
23 unfounded when they expressed their opinion that their votes  
24 were stolen?

25 A. They can have that opinion.

1 Q. Okay. The question was -- well, I'll ask a different  
2 question. Do you care that people, your fellow delegates in  
3 Kalamazoo County, were upset or angry and voiced their  
4 position that their vote was stolen?

5 A. Their vote was not stolen.

6 Q. Do you care about their opinion?

7 A. Their opinion is their opinion, Matt. That doesn't matter.  
8 That doesn't change anything. I can have an opinion, too.

9 Q. Okay. Do you intend to run for public office in the future?

10 A. Hell no. Not that I know of. I have not talked to anyone  
11 about running for public office.

12 Q. What is the relief that you're requesting in Count I of your  
13 complaint which deals with violation of MCL 168.599?

14 MR. THOMAS: It also deals with Chapter 13 of the  
15 state bylaws and also deals with the KGOP bylaws.

16 THE WITNESS: I think it's Article 13, not Chapter.

17 MR. THOMAS: Or Article 13. I'm sorry.

18 THE WITNESS: Article 13, Article 13.

19 MR. THOMAS: So it's not just -- it's not just the  
20 statute, as I recall.

21 BY MR. DePERNO:

22 Q. What do you want?

23 A. You removed.

24 Q. So what you want in Count I is the three delegates who were  
25 elected to the statutory seats to be removed?

1 A. I want the three delegates who were unlawfully elected to  
2 statutory seats to be removed because it's in violation of the  
3 KGOP bylaws, which would then make the KGOP in violation of  
4 the laws of its creation.

5 Q. Is that the only reason why you care that delegates were  
6 elected to those statutory seats?

7 A. There is a fiduciary duty to follow the bylaws. Otherwise  
8 you're rogue, which you are right now.

9 Q. Is that the only reason that you care?

10 A. Yes. I care about the following of the KGOP bylaws.  
11 Otherwise, you're rogue.

12 Q. What relief are you demanding in Count II of your complaint?

13 A. Count II?

14 Q. It's stated, "Judicial Declaration: Michigan Constitution:  
15 Article 1, Section 2, Equal Protection Of The Laws And Due  
16 Process."

17 A. The relief would be whatever the Court would give us.

18 Q. Are you asking for something in particular?

19 A. Whatever the Court would decide, which hasn't happened yet.

20 MR. THOMAS: Do you want to let her look and read  
21 that to refresh her memory?

22 THE WITNESS: Yeah, because I don't remember.

23 MR. DePERNO: I think I have it.

24 (Short pause.)

25 MR. THOMAS: What page is Count II on?

1 MR. DePERNO: There's no page numbers.

2 THE WITNESS: There's no page numbers here.

3 MR. THOMAS: Oh, yeah, I'm bad about that.

4 (Short pause.)

5 THE WITNESS: Do you want to look?

6 MR. THOMAS: I think it's one, two, three pages, if  
7 just want to read it.

8 (Long pause.)

9 MR. THOMAS: Off the record.

10 (Discussion off the record.)

11 BY MR. DePERNO:

12 Q. Have you had a chance to look at your Count II of the  
13 complaint?

14 A. Yes. And so my answer before was based on whatever the Court  
15 decides, but now it's listed here so I can go and read it. It  
16 says, "Wherefore, the plaintiffs request this Court issue an  
17 order declaring that, Under MCR 2.605, grant equitable relief  
18 and a declaratory judgment in favor of Plaintiffs, Grant a  
19 declaratory judgment that Defendants violated Plaintiffs  
20 Michigan Constitutional rights, Grant Plaintiffs' costs,  
21 expenses and attorney fees incurred for having to bring this  
22 action to protect the plaintiffs' rights, Grant compensatory,  
23 incidental, noneconomic, and punitive damages that a jury may  
24 find on any disputed facts, Grant any other relief this Court  
25 deems just and proper [sic]."

1 Q. Paragraph 46 of your complaint states that the Defendants are  
2 trying to quash the religious views of Plaintiffs. Can you  
3 explain how the Defendants are doing that?

4 A. You wrote it in what --

5 (Clarification question by Reporter.)

6 THE WITNESS: Matt wrote it. Matt wrote it in  
7 his writings to the Court and he called us Christian cult  
8 members.

9 BY MR. DePERNO:

10 Q. Do you understand that your complaint in Count II deals with  
11 censoring [sic] and removing delegate-elected KGOPEC members  
12 and ex-officio members of the KGOPEC? That's your paragraph  
13 44.

14 A. Paragraph 44?

15 Q. Right.

16 A. I understand that there's a bunch of lines in this paragraph  
17 as far as you stating that we're here to burn down the party.  
18 You stated that, so we're just stating what you stated.  
19 "Specifically, through the Defendants own words and admissions  
20 states ... delegates who support Plaintiff Pritchett-Evans  
21 want to focus on burning down the party," which is a lie,  
22 "where raising money and getting Republicans elected is not  
23 important," which is a lie, and you say this, Matt, "but  
24 instead desire to push a radical agenda through a 'Christian  
25 only'" -- "Christian only" is what you said -- "cult mentality

1 that will 'purify' the party; and only when the party is  
2 'purified' will the party be able to attract the 'right kind'  
3 of donors needed to transform the party into their image."  
4 You don't have anything with me saying any of those words.  
5 You were putting this out there, Matt.

6 Q. So your Count II, as you just described, is based on words  
7 that were written in a legal brief after you filed your  
8 original lawsuit, correct?

9 A. You were speaking on behalf of the defendants in your legal  
10 brief, so, therefore, I take you for your word that the  
11 defendants are saying these things.

12 Q. Again, you're not -- I'm going to ask the question again. I  
13 just -- I hope you can just sort of comprehend what I'm saying  
14 and focus on the question and answer the question without  
15 veering off into your rhetorical comments.

16 The question is, your Count II then is based on what  
17 was written in a legal brief after you were removed as an  
18 ex-officio member, correct?

19 A. You put this garbage in here, Matt, so I'm assuming that it is  
20 based on the words of the KGOP and the defendants. You put it  
21 in there, Matt. I didn't put it in there. You did.

22 Q. Okay. Let's try it a different way. What are you asking --  
23 what is your complaint, Count II, about?

24 A. You claim that this is the reason that we were kicked out,  
25 because of these things.

1 Q. So Count II is about you being kicked out, correct?

2 A. Everything. Defamation of character, tyranny, removal from --

3 Q. All right. Let's move on because it's obvious you have no  
4 idea what Count II is about.

5 A. Okay.

6 Q. Let's move on to Count III. What is your Count III about, in  
7 your words?

8 (Short pause.)

9 A. This is regarding Kelly's breach of her fiduciary duty.  
10 Kelly Sackett's breach of fiduciary duty.

11 Q. In what way did Kelly Sackett, in your words, breach her  
12 fiduciary duty?

13 A. I stated that actually earlier when I talked about the bylaws.  
14 And the bylaws bind it to -- bound -- bind the KGOP to the  
15 Michigan state laws and the party rules, state party rules.  
16 And under there there are ways that you can remove and you can  
17 add statutory members. She completely violated that. And  
18 so, therefore, when you violate the bylaws which you were  
19 established under as the chair, you are in breach of your  
20 fiduciary duties.

21 Q. And you want \$25,000 for that?

22 A. Over.

23 Q. Over. Why do you want money for that, what you allege is a  
24 breach of fiduciary duty?

25 A. There's harm done, Matt.

1 Q. What harm is done?

2 A. She breached her fiduciary duty. She caused issues with  
3 defamation of character, which then also lowers standards in  
4 the community based on Kelly Sackett and what Kelly Sackett  
5 said and what the KGOP said. What they did to Kim Harris is  
6 all a violation of the bylaws.

7 Q. So how do you -- how do you calculate damages of more than  
8 \$25,000?

9 A. That will be decided in court.

10 Q. Do you have any evidence of any monetary damages?

11 A. That will be decided in court.

12 Q. Can you tell me anything right now in any way where you've  
13 been monetarily damaged?

14 A. That will be decided in court.

15 Q. Count IV is a slander claim where you again ask for monetary  
16 damages. Can you explain to me how you have been monetarily  
17 damaged?

18 A. I've already said that, Matt.

19 Q. No, this is a different count. This is Count IV now.

20 A. Okay.

21 Q. How have you been monetarily damaged?

22 A. It reduced in standing [sic] in the community based on press  
23 releases, comments, posts by the KGOP. It has reduced us in  
24 standards in the community. Therefore, that right there is a  
25 violation and a defamation of character by what was posted by

1 the KGOPEC.

2 Q. So I've looked through the discovery you produced and I didn't  
3 see any discovery that indicated any evidence of damage within  
4 the community. Can you explain then how you've been damaged  
5 within the community?

6 A. That will be decided at court.

7 Q. So you don't have any evidence of your damages?

8 A. That will be decided in court.

9 (Exhibit 10 marked for identification.)

10 BY MR. DePERNO:

11 Q. Exhibit 10 is your Answers to Request for Admissions.

12 A. Uh-huh.

13 Q. Are you familiar with these?

14 A. Yes.

15 Q. Number 5 asks you to "Admit that MCL 168.599 protects the  
16 so-called 'establishment' or 'old guard' of the Republican  
17 party and disenfranchises grassroots activists." You objected  
18 and stated it called for a legal conclusion. I'm going to  
19 give you the opportunity now to amend your answer if you would  
20 like.

21 A. Objection, calls for a legal conclusion. I answered it.

22 Q. Do you understand that the court rule permits the defendants  
23 to ask you questions regarding a legal opinion as it relates  
24 to facts? Yes or no?

25 A. First of all, these are not facts. It's your words.

1 Q. Did you vote for Barack Obama for President of the United  
2 States?

3 A. Objection.

4 MR. THOMAS: Objection, Article II, Section 4 of the  
5 Constitution. It's preservation of secrecy of the ballot in  
6 presidential elections.

7 BY MR. DePERNO:

8 Q. Paragraph 14 --

9 A. Question 14 or paragraph 14?

10 Q. Question 14 says, "Admit that you have not been censored by  
11 any of the defendants." You denied that and you said you have  
12 been censored.

13 A. Uh-huh.

14 Q. How have you been censored?

15 A. According to the censure that was placed on the KGOP website  
16 and the reading of Kelly's docket.

17 Q. Do you understand the difference between the word censored and  
18 censured?

19 A. Oh, sorry. I got that wrong then. Sorry.

20 Q. So how have you been censored?

21 A. Censored as far as not being able to speak up or not being  
22 able to talk.

23 Q. Has anyone ever denied you the right to speak up or talk?

24 A. Actually, in the March 1st meeting of 2013 or 2023 when Kelly  
25 Sackett read off all of her censures, we were not allowed to

1 talk. So, therefore, we were censured.

2 (Exhibit 11 marked for identification.)

3 BY MR. DePERNO:

4 Q. These are your answers to the request for production of  
5 documents. Do they look familiar?

6 A. Yes.

7 Q. Number 4 asks you to produce the Telegram chat download for  
8 MI Precinct First. Did you produce that?

9 A. Unreasonable and harassing. You basically never even put any  
10 dates on here and I don't even know how to produce this to  
11 do this, but there were no dates and so, no, there's no  
12 production for that and there was an objection for  
13 unreasonable and harassing and ambiguous.

14 Q. Are you a member of the Michigan Precinct First Telegram chat  
15 group?

16 A. Actually, I don't even think I'm a member of that. I don't  
17 even know what that is. Is that the one -- I don't even know.  
18 Is that the one that Kim had?

19 Q. We'll move on. Your answer clearly indicates you made no  
20 effort to actually figure this one out.

21 Number 5 asks the same for Kalamazoo County  
22 Patriots. Are you a member of Kalamazoo County Patriots?

23 A. A member? I'm on the channel.

24 Q. Okay. And so you're refusing to produce that chat group  
25 channel, right?

1 A. It's oppressive, unreasonable, harassing. You have no dates.

2 Q. How is it oppressive?

3 A. Because it has no dates on it and, therefore, you're asking me  
4 to produce something that really I don't even have a clue how  
5 to go on there and produce, like, 20,000 pages of something  
6 that has nothing to do with this case.

7           And, actually, go back to the other question where  
8 you asked about Michigan Precinct First. I'm not a member  
9 of that because I see Kim's group is the Kalamazoo County  
10 Precincts. So I'm not a member of Michigan Precinct First.

11 Q. You filed a complaint with the FBI against Kelly Sackett,  
12 correct?

13 A. Actually, I filed a complaint with the DOJ. The DOJ sent it  
14 to the FBI.

15 Q. Why did you file a complaint with the DOJ?

16 A. Do you have the complaint there? You can read it.

17 Q. I don't have the complaint. I'm asking you why you filed  
18 the complaint.

19 A. Well, you have it there. And I'll read it, why I filed it,  
20 because it's all in the complaint.

21 Q. I don't have it. I'm asking you why did you file --

22 A. I gave it to you.

23 Q. I'm asking you why did you file --

24 A. Okay. It's in the complaint.

25 Q. You're saying your DOJ is in here?

1 MR. THOMAS: That's not what she said.

2 THE WITNESS: It's in your discovery.

3 BY MR. DePERNO:

4 Q. Okay. It may be. I'm asking you why you filed a complaint?

5 A. Let me see if I have it here so I can read it and I will tell  
6 you why. I don't want to misspeak on this. I want every word  
7 of this. It says right here --

8 (Clarification by Reporter.)

9 THE WITNESS: I know I read fast.

10 (Short pause.)

11 Okay. "I'm reporting a possible abuse of power  
12 in violation of Michigan Election Law. Kelly Sackett of  
13 Kalamazoo County is a chair of the Kalamazoo Republican  
14 Party Committee, State of Michigan, KGOP. She has been  
15 intimidating duly elected precinct delegates that use their  
16 constitutionally protected First Amendment right to speak,  
17 assemble, and represent their precincts. Duly elected  
18 precinct delegates are election officials elected by  
19 registered voters in their respective precincts. This week  
20 Kelly Sackett sent 22 duly elected Kalamazoo County delegates  
21 a letter that they are removed as precinct delegates by her  
22 authority. No due process has occurred or recall. She is  
23 sending a message to all duly elected precinct delegates that  
24 if they don't follow her and agree with her, they will be  
25 removed. That is an abuse of power and the sending of the

1 letters is a violation of Michigan Election Laws established  
2 by Michigan legislators. It also disenfranchises all the  
3 voters that voted for the duly elected precinct delegates."

4 Q. Did you file any other criminal complaints in this matter?

5 MR. THOMAS: Objection. That's not a criminal  
6 complaint.

7 MR. DePERNO: You're suggesting that filing a  
8 complaint with the DOJ is not a criminal complaint?

9 MR. THOMAS: It's not a criminal complaint. It's a  
10 complaint, but it's not a criminal complaint unless they deem  
11 it to be criminal.

12 BY MR. DePERNO:

13 Q. Did you file any other criminal complaints in this matter?

14 A. Related to this?

15 Q. In this case.

16 A. I think I filed something with the Secretary of State because  
17 Kelly was accepting money above and beyond for her campaign  
18 above the 1,050 amount and then putting it back in under her  
19 husband's name.

20 Q. Have you filed any other complaints related to this case?

21 A. I believe I called the Sheriff's Department.

22 Q. So we have the DOJ, we have the Secretary of State, and we  
23 have the Sheriff's Department?

24 A. Correct.

25 Q. Anyone else?

- 1 A. That's all I recall.
- 2 Q. Did you file a complaint with Dana Nessel?
- 3 A. The AG? If I did, it would have been the same thing. I don't  
4 recall, though. I could have.
- 5 Q. Are there any other agencies you could possibly think of that  
6 you would like to file complaints with regarding this?
- 7 A. If I do, I will file them.
- 8 Q. Will there be any based on race?
- 9 A. If it's based on race, yes.
- 10 Q. Have you been paid in any way by anyone or any entity for your  
11 political activities since 2020?
- 12 A. No.
- 13 Q. Have you ever attended a Democrat fundraiser or event?
- 14 A. It was not for a -- was it a Democrat? I'm sure I've attended  
15 an event somewhere.
- 16 Q. Have you ever been to the Democratic party office on  
17 Westnedge?
- 18 A. Not that I can recall. You know what? My massage therapist  
19 is in that same office. So they were in the same office as my  
20 massage therapist. So I guess I have been at that office.  
21 Not for the Democratic party, though, but for a massage.
- 22 Q. Have you ever had contact with Elizabeth Byrd(ph)?
- 23 A. Elizabeth Byrd? Who is that?
- 24 Q. She's the deputy clerk. She resigned in the fall of 2022.
- 25 A. No. I don't know her.

1 Q. How many Ottawa County events have you attended?

2 A. Just that one, the convention.

3 Q. Have you ever met with the president of Planned Parenthood?

4 A. No. Not that I recall.

5 MR. THOMAS: Can you name his name, please?

6 MR. DePERNO: I don't know.

7 THE WITNESS: He's just throwing anything out there.

8 BY MR. DePERNO:

9 Q. Why do you want to be the chair of the Kalamazoo County  
10 Republican party?

11 A. I'm not the chair.

12 Q. Did you complain to Joel Studebaker about the rules, the  
13 District 4 rules prior to February 16th?

14 A. I did not complain to Joel Studebaker.

15 Q. When did your group start using the Base Camp app to  
16 communicate?

17 A. What the hell is that? I don't even know what that is.

18 (Short pause.)

19 THE WITNESS: Hi, Charley.

20 BY MR. DePERNO:

21 Q. Did you take an oath of office when you became the District 4  
22 vice chair?

23 A. Yes.

24 Q. Did you change the District 4 caucus secretary's minutes after  
25 they had been submitted to you?

1 A. Changed the minutes? Well, the minutes were submitted to us  
2 prior to the meeting which Emily put on there that those  
3 minutes had been approved and they had not been approved. So  
4 I sent them back to her. And then at the meeting they were  
5 approved with changes.

6 MR. THOMAS: Can we articulate what minutes we're  
7 talking about, like, the month or the date? So we're not  
8 talking about three months ago or two months ago or a month  
9 ago.

10 MR. DePERNO: It seems obvious the witness  
11 understands what --

12 MR. THOMAS: Well, I don't care what she  
13 understands. I don't understand so I want to be able to  
14 understand.

15 BY MR. DePERNO:

16 Q. Have you ever changed any District 4 caucus minutes sent to  
17 you by the secretary?

18 A. I haven't changed any minutes.

19 MR. THOMAS: Let him produce whatever it is he's  
20 going to produce so you can look.

21 (Short pause.)

22 BY MR. DePERNO:

23 Q. Did you donate money to the Democratic party in 2021?

24 A. Are we moving on to another question? Because you asked me  
25 one question and now we're moving on to something else.

1 Q. Did you donate money to the Democratic party in 2021?

2 A. In 2021? Oh, you're talking about that -- wait a minute.

3 (Clarification question by Reporter.)

4 THE WITNESS: I'm trying to think to myself. Sorry.

5 Do you have something there to look at? Because I don't

6 recall donating in 2021.

7 BY MR. DePERNO:

8 Q. Did you donate money to anyone in the Democratic party in

9 2020?

10 A. In 2020? Yes, I did. I donated to several Republicans,

11 too.

12 Q. Did you donate money to the Democratic party in 2019?

13 A. 2019, 2019. Do you have something I can look at?

14 Q. It's just a question.

15 A. Do you have something I can look at? Because I don't recall

16 who I donated to in 2019.

17 Q. Did you donate money to anyone in the Democratic party in

18 2018?

19 A. I don't recall. Actually, 2018? I gave \$500 to Margaret

20 O'Brien in 2018 I know for sure. I don't remember what else I

21 did in 2018 and she's a Republican.

22 Q. Who is Peter Battani to you?

23 A. Peter Battani is a friend.

24 Q. How did you become associated with Peter Battani?

25 A. He's a friend.

1 Q. Have you ever attended Democratic functions with Peter  
2 Battani?

3 A. No. Actually, yeah, I did do something. It was, like, a --  
4 something popcorn, movie, or something like that that I went  
5 with Peter years ago.

6 Q. Have you ever attended Democratic functions as Peter Battani's  
7 guest?

8 A. Not that I recall.

9 Q. Does Peter Battani advise you on political matters?

10 A. No.

11 Q. Has Peter Battani advised you on this case?

12 A. No.

13 Q. Have you ever devised political strategies with Peter  
14 Battani?

15 A. No.

16 Q. In 2021 did you bring Peter Battani to the KGOP coffee meeting  
17 with Dr. Tamara Mitchell that she was leading where Peter  
18 Battani was asked to leave because he became disruptive?

19 A. I think Peter just left. He was not asked to leave.

20 Q. Have you at any time stated that the Kalamazoo County  
21 Republican Committee Executive Committee took an illegal  
22 vote?

23 A. You did. You violated the bylaws. You took an unlawful vote  
24 in violation of your bylaws to put delegates in statutory  
25 positions.

1 Q. The question was, have you at any time stated that the  
2 Kalamazoo County Republican Committee Executive Committee took  
3 an illegal vote?

4 A. I did not state that at convention if that's what you're  
5 asking, no, and I don't know about any other time. I don't  
6 remember. I don't recall.

7 Q. Have you at any time stated that the Kalamazoo County  
8 Republican Committee Executive Committee is corrupt?

9 A. I don't recall making that statement.

10 Q. Have you ever solicited members of the Kalamazoo County  
11 Republican Committee members at Kalamazoo County Republican  
12 Committee meetings to purchase insurance products from your  
13 insurance business?

14 A. Never. Not that I recall, no.

15 Q. Are you upset with the Executive Committee because members on  
16 the Executive Committee refused to purchase insurance products  
17 from your insurance business?

18 A. Matt, you know that's a bunch of bullshit. I've never asked  
19 anybody to purchase anything from me at the Executive  
20 Committee. I keep it separate.

21 Q. Have you ever solicited anyone from the Kalamazoo County  
22 Democratic party to purchase products from your insurance  
23 business?

24 A. I do not go after political parties to purchase insurance from  
25 me. Anyone can purchase insurance from me no matter their

1 political affiliation.

2 Q. Which KGOP Executive Committee members did you target for  
3 removal from the Executive Committee?

4 A. I didn't target anyone for removal except for you and the  
5 three that were unlawfully put in the position.

6 Q. Did you tell Kerry Lynn Elieff to send out Facebook messages  
7 to county delegates telling them not to vote for Kalamazoo  
8 County delegates?

9 A. Kerry Lynn is her own person. No, I have never told her what  
10 to do.

11 Q. Did you ever have any discussions with Kerry Lynn Elieff about  
12 removing Kelly Sackett as chair of the Kalamazoo County  
13 Republican Committee?

14 A. After February 17th and after everything happened, a  
15 discussion did -- I didn't have it with just Kerry Lynn.  
16 There were other people. I don't know all the people involved  
17 with wanting to remove Kelly. There's more than just me and  
18 Kerry Lynn that would like Kelly removed.

19 Q. And is the same true regarding removal of Charley Coss as vice  
20 chair?

21 A. Charley Coss's name doesn't come up as far as -- it's Kelly  
22 Sackett.

23 Q. Did you have any discussion with Kerry Lynn Elieff about  
24 blocking Charley Coss from any post on the MiGOP state  
25 committee?

- 1 A. What? I don't know what you're talking about, Matt. No.
- 2 Q. Have you had any discussions with Kerry Lynn regarding Roger  
3 McMillen?
- 4 A. Other than Roger McMillen standing up and lying at that  
5 meeting that you said that the delegates were there and said  
6 that their vote was stolen. Roger McMillen stood up and lied.  
7 So I might have had conversations with her about that. I'm  
8 not for sure, though.
- 9 Q. Were you angry with Dr. Tamara Mitchell for asking her  
10 supporters to support Kelly Sackett for KGOP chair?
- 11 A. No, I was not angry with Dr. Mitchell.
- 12 Q. Have you ever crafted any Facebook posts or Telegram posts for  
13 Kerry Lynn Elieff that are later sent by Kerry Lynn Elieff?
- 14 A. No.
- 15 Q. Did you offer to pay Kerry Lynn Elieff's legal fees if she was  
16 sued for defamation?
- 17 A. Where are you coming up with this crap? No.
- 18 Q. Did you prepare statements made by Sandra VanderLugt before  
19 any Kalamazoo County Executive Committee meetings?
- 20 A. People can prepare their own statements. They're very smart.  
21 No, I did not prepare any statements for anyone.
- 22 Q. Have you had any discussions with Mary Balkema regarding the  
23 April 10, 2023 Executive Committee meeting?
- 24 A. Is that where the false police reports were made?
- 25 Q. I don't know.

1 A. Yeah, if that's where the false police reports were made, Mary  
2 saw what happened and she knew that it was false.

3 Q. Have you called anyone at the office of the Kalamazoo County  
4 Prosecuting Attorney and asked that charges not be filed  
5 against Sandra VanderLugt?

6 A. No, I have not called anyone and asked for charges not to be  
7 filed.

8 Q. Did you say to anyone that Sandra VanderLugt never assaulted  
9 Dr. Tamara Mitchell on April 10th?

10 A. Yes, I did.

11 Q. Who did you say that to?

12 A. I said it to Mary Balkema and I also said it to -- I did tell  
13 the prosecuting attorney that Sandra VanderLugt [sic], but I  
14 didn't call him and tell him that.

15 Q. What is your financial arrangement with Ken Beyer pertaining  
16 to the legal costs of this case?

17 A. These are a joke. There is no financial with Ken Beyer.

18 Q. Is Ken Beyer contributing financially to this case?

19 A. I don't know if he donated to the fund.

20 Q. Have you had any discussion with Robyn Peake about this case?

21 A. Other than the fact that you posted something about her.

22 Q. Does Robyn Peake support you in this case?

23 A. I don't know.

24 Q. Did you call William Bennett on the morning of February 17th,  
25 2023 and tell him to make the motion to set aside Rule 9?

1 A. No, I did not call Bill Bennett and tell him to make a motion  
2 to set aside Rule 9. I called Bill Bennett to say, "If  
3 there's a motion to make, can you make the motion?" We did  
4 not even know at that point what Rule 9 was going to be. So,  
5 no, there was no call in the morning to Bill to say, "Set  
6 aside Rule 9."

7 MR. DePERNO: I don't have any other questions.

8 (Deposition concluded at 12:31 p.m.)

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CERTIFICATE

1  
2  
3 STATE OF MICHIGAN )  
4 )  
5 COUNTY OF KENT )  
6

7 I, REBECCA S. RENZEMA, Certified Shorthand Reporter  
8 and Notary Public, do hereby certify that the foregoing matter  
9 was taken before me at the time and place hereinbefore set  
10 forth.

11 I FURTHER CERTIFY that this matter was taken in  
12 shorthand and thereafter transcribed by me and that it is a  
13 true and accurate transcript.

14 IN WITNESS WHEREOF, I have hereunto set my hand this  
15 10th day of July of 2023 at Allegan, Michigan.

16 *Rebecca Renzema*  
17

18 REBECCA S. RENZEMA, CSR-1435

19 Notary Public for Allegan County.

20 My Commission Expires: 12-31-2028  
21  
22  
23  
24  
25

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