

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

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SABRINA PRITCHETT-EVANS and  
KIMBERLY HARRIS,

Plaintiffs,

v

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.

Case No. 2023-0169-CZ

HON. CURTIS J. BELL

---

DEPOSITION OF WILLIAM BENNETT

DATE: June 29, 2023  
TIME: 12:03 p.m.  
LOCATION: Fairfield Inn & Suites by Marriott  
3303 Retail Place Drive  
Kalamazoo, Michigan  
REPORTER: Rebecca S. Renzema, CSR-1435

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6 KIMBERLY HARRIS,

7 Plaintiffs,

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10 COUNTY, STATE OF MICHIGAN (KGOP),

11 KALAMAZOO GRAND OLD PARTY

12 EXECUTIVE COMMITTEE (KGOPEC); and

13 (AKA) KALAMAZOO COUNTY

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1 APPEARANCES:

2  
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9 On behalf of Witness

10  
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16 On behalf of Defendants

17  
18 ALSO PRESENT: Charley Coss

19 Kelly Sackett

20 Kimberly Harris

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Kalamazoo, Michigan

June 29, 2023; 12:03 p.m.

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MR. DePERNO: We're here for the deposition today of William Bennett. In the room with me is Kelly Sackett, a named defendant, Charley Coss will be here in a few minutes, and also Steve Hessen on behalf of William Bennett, and Kim Harris is here. It's my understanding that Jimmy Thomas will not be attending the deposition.

\* \* \*

WILLIAM BENNETT,

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

EXAMINATION

BY MR. DePERNO:

Q. Mr. Bennett, can you state your full name and spell your name?

A. William Bennett. W-i-l-l-i-a-m B-e-n-n-e-t-t.

Q. Do you go by any other names?

A. Bill.

Q. Have you ever been in a deposition before?

A. Yes.

Q. So the basic rules that I want to go over is I'm going to ask you questions and please wait until I finish asking the question before you respond so that we don't talk over each

1 other so the court reporter can get down exactly what you're  
2 saying. If you need a break at any time, just say you need a  
3 break and we'll stop. Fair enough?  
4 A. Okay.  
5 Q. Do you have any conditions that would affect your memory?  
6 A. No.  
7 Q. Do you have any conditions that would affect your ability to  
8 answer questions today completely and truthfully?  
9 A. No.  
10 Q. Are you taking any medication that would affect your memory?  
11 A. No.  
12 Q. Are you taking any medication that would affect your ability  
13 to answer questions today completely and truthfully?  
14 A. No.  
15 Q. Do you have any other reason to believe or are there any other  
16 things that you believe are affecting your memory today or  
17 your ability to answer completely and truthfully today?  
18 A. No.  
19 Q. What is your home address?  
20 A. 4262 Autumn, like the season, Joy, J-o-y, Street, Galesburg,  
21 Michigan, 49053.  
22 Q. And what is your date and place of birth?  
23 A. November 23rd, 1964, Lansing, Michigan.  
24 Q. Have you ever been convicted of fraud or any other crime?  
25 A. No.

1 Q. Have you ever been investigated for fraud or any other  
2 crime?

3 (Short pause.)

4 A. I don't know.

5 Q. Okay. Have you been contacted by the police about any  
6 investigation?

7 A. No.

8 Q. Have you ever been involved in any civil litigation?

9 A. No.

10 Q. What is your current employer?

11 A. I am retired from the United States Air Force and I am  
12 self-employed.

13 Q. What is your company?

14 A. Houghtons, Incorporated. H-o-u-g-h-t-o-n-s.

15 Q. And what is the address of your company?

16 A. Same as my home.

17 Q. And what type of consulting do you do?

18 A. Hazardous materials response and identification of unknown  
19 hazards.

20 Q. How long have you been doing this job regarding hazardous  
21 materials?

22 A. Including my Air Force career, 23 years.

23 Q. So I assume then by your answer that you did this type of work  
24 for the Air Force?

25 A. Yes, sir.

- 1 Q. What was your last rank and title in the military?
- 2 A. Master sergeant.
- 3 Q. Do you do any government consulting work?
- 4 A. I just started. I haven't actually done the work yet, but I
- 5 just secured new business.
- 6 Q. Do you have a high school diploma?
- 7 A. Yes.
- 8 Q. Do you have a college diploma?
- 9 A. Yes.
- 10 Q. What years did you attend college?
- 11 A. 1985 through 2012.
- 12 Q. What university?
- 13 A. It's kind of a long list. Lansing Community College, Michigan
- 14 State University, University of Phoenix, and Cornerstone
- 15 University.
- 16 Q. What degree did you get from Lansing Community?
- 17 A. Emergency medicine. Actually, I didn't actually receive a
- 18 degree from there. That was my field of study.
- 19 Q. How about Michigan State University?
- 20 A. Never received a degree from there.
- 21 Q. How about University of Phoenix?
- 22 A. Bachelor of science.
- 23 Q. In what field?
- 24 A. Security management.
- 25 Q. And how about Cornerstone?

1 A. Master of science in management.

2 Q. Other than a driver's license do you have any licenses or  
3 certificates?

4 A. I probably have hundreds of certificates from the Air Force  
5 over my 32-year career. I have a concealed pistol license.

6 Q. How about any licenses regarding your job regarding hazardous  
7 materials?

8 A. Not licenses, no.

9 Q. Did they require periodic training in that field?

10 A. Yes.

11 Q. Is there an organization that oversees that field?

12 A. International Association of Fire Chiefs. And it's very  
13 jurisdictional dependent beyond that.

14 Q. Have you ever had any disciplinary actions in the Air Force?

15 A. No.

16 Q. How about any disciplinary actions regarding any licensing  
17 authority?

18 A. No.

19 Q. Are you member of any professional associations?

20 A. Yes. International Association of Bomb Technicians and  
21 Investigators.

22 (Exhibit 1 marked for identification.)

23 BY MR. DePERNO:

24 Q. I'm going to show you -- this is Exhibit 1, which is a  
25 subpoena that you were given. Have you reviewed this

1 previously?

2 A. Yes.

3 Q. And take the time now if you want to look at it to make sure  
4 it's complete.

5 (Short pause.)

6 A. Yes.

7 Q. Is this subpoena how you found out that you needed to be here  
8 today?

9 A. Yes.

10 Q. And you understand that you're here today as a witness  
11 regarding a lawsuit filed by Sabrina Pritchett-Evans and  
12 Kimberly Harris?

13 A. Yes.

14 Q. Have you helped the plaintiffs raise money for their  
15 lawsuit?

16 A. Yes.

17 MR. HESSEN: Objection, vague.

18 MR. DePERNO: I'm sorry?

19 MR. HESSEN: Objection, vague. Go ahead. You can  
20 answer.

21 THE WITNESS: Yes.

22 BY MR. DePERNO:

23 Q. How did you help the plaintiffs raise money?

24 A. I established a fundraising site through Give, Send, Go.

25 Q. Do you know how much money has been raised?

1 A. No.

2 Q. Do you have any responsibility with the Give, Send, Go account  
3 after you established it?

4 A. No.

5 Q. Who did you turn control over to after you established it?

6 A. Jimmy Thomas.

7 Q. Why did you get involved in establishing a Give, Send, Go  
8 account?

9 A. I was asked to.

10 Q. Who asked you to?

11 A. Sabrina Pritchett-Evans.

12 Q. And what did she ask you to do specifically?

13 A. She just asked me to establish the fundraiser on that site.

14 Q. Did she ask you to join in this lawsuit?

15 A. I don't know if she did personally.

16 Q. Did anybody ask you to join in this lawsuit?

17 A. I can't say for certain if any one person asked me to join it.

18 Q. Did you decline that invitation from anybody?

19 MR. HESSEN: Object to the form of the question.

20 You can go ahead and answer.

21 THE WITNESS: I'm sorry?

22 MR. HESSEN: You can answer the question if you  
23 understand it.

24 THE WITNESS: Yes, I believe so.

25

1 BY MR. DePERNO:

2 Q. Why did you decline an invitation to join in this lawsuit?

3 A. Because I didn't feel it was in my best interest.

4 Q. In what way was it not in your best interest?

5 A. I spoke to legal advisors and spoke to my wife, discussed it  
6 with my wife, and I came to the conclusion I did not want to  
7 join it.

8 Q. The subpoena in front of you asks that you bring with you  
9 certain documents today and prior to the deposition you did  
10 hand a box of documents to me, correct?

11 A. Yes.

12 Q. Now, in paging through this set I noticed that there are some  
13 blacked-out pages. Can you explain why there's redacted  
14 portions?

15 A. I believe those were photos and that's just the way they  
16 printed.

17 Q. Okay. So there's no text under there?

18 A. No.

19 Q. Understood. There wasn't any objection you were making as to  
20 the content of the information, is there?

21 A. No, sir.

22 Q. Did you produce Telegram chats for Michigan Precinct First?

23 A. Yes.

24 Q. Okay. Are you an administrator of that group?

25 A. Yes.

1 Q. Did you produce Telegram chats for Kalamazoo County  
2 Patriots?  
3 A. No.  
4 Q. Why not?  
5 A. Because I don't believe I'm a member of that group.  
6 Q. Okay. How about for Kalamazoo County Precincts First?  
7 A. I believe so.  
8 Q. Are you an administrator of that group?  
9 A. Not that I'm aware of.  
10 Q. How about Michigan Conservatives Take Action?  
11 A. No.  
12 Q. Are you a member of that group?  
13 A. No.  
14 Q. And how about Michigan Congressional District 4?  
15 A. Yes.  
16 Q. Are you an administrator of that group?  
17 A. No.  
18 Q. Is there anything within this production request that you did  
19 not produce?  
20 A. Well, I didn't produce anything for Districts 7, 9, or 10  
21 because I'm not a part of any of that. I produced all of the  
22 correspondence I had with the folks I had it for that are  
23 listed here on the bottom of page 2, but I don't honestly know  
24 two-thirds of these people.  
25 Q. Understood. For number 9 did you produce documents regarding

1 the February 17th district caucuses or convention?

2 A. Yes.

3 Q. And did you produce documents you had regarding the

4 February 18th state convention?

5 A. Yes, those that I still had.

6 Q. And how about number 11 for the "Good Neighbor Program"?

7 A. I'm not familiar with that.

8 Q. Are you familiar with number 12 about the "America First

9 Playbook"?

10 A. I've heard about it, but I've not seen anything regarding

11 that.

12 Q. And how about number 13 for something called "Tactical

13 Civics"?

14 A. Same. I've heard of it, but I don't know and I haven't

15 attended anything concerning that.

16 Q. And for 14, how about "The Doctrine of the Lesser

17 Magistrates"?

18 A. Never heard of that ever.

19 Q. How about 15 for something called "Michigan Precincts First"?

20 Are you familiar with that?

21 A. I don't believe so.

22 Q. Have you heard of number 16, something called "We the People"?

23 A. Not as an organization, no.

24 Q. Have you heard of the concept then?

25 A. I don't believe so, no.

1 Q. Have you ever talked to David Zuniga?

2 A. Not to my knowledge.

3 Q. Have you ever talked to Matthew Trewhella?

4 A. Not to my knowledge.

5 Q. And number 19 asked you about some telephone numbers. Did you  
6 have any information regarding any of those numbers?

7 A. I inputted all those numbers to see if I had any  
8 correspondence that came up and I don't.

9 Q. And it's fair to say then that you don't own any of those  
10 numbers?

11 A. That's absolutely true.

12 Q. Okay. We may come back to 21 through 28. And is it your  
13 belief that you produced everything that you would have to  
14 produce?

15 A. Absolutely.

16 Q. Okay. How did you prepare for this deposition today?

17 A. Spent a couple days going through e-mail, Telegram, and  
18 messages, comparing everything you asked for against my  
19 records and printing everything that you asked for.

20 Q. Did you talk to anybody in preparation for this deposition?

21 A. Just my wife and my attorney.

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

23 A. Just trying to be a knowledgeable, concerned citizen, and as  
24 a member of the United States Military you have to be very  
25 careful about being involved in politics. Overtly involved.

1 Q. Does that preclude you from joining a political  
2 organization?  
3 A. No, I don't believe so.  
4 Q. And when did you leave the military?  
5 A. I retired in October of 2017.  
6 Q. Were you a member of any political organization after you  
7 retired from the military?  
8 A. Not until last year when I started attending KGOP meetings.  
9 Q. So it's fair to say then that your first attendance at an  
10 organized political function was in 2022?  
11 A. Yes.  
12 Q. And what got you interested in politics to where you wanted to  
13 attend an organization's meeting?  
14 A. I came to the realization that I couldn't complain about  
15 what was going on without doing something affirmative to be  
16 involved.  
17 Q. Was there any particular issue that sparked your interest?  
18 A. I don't think so. Just a lifelong conservative.  
19 Q. When did you become a delegate?  
20 A. Precinct delegate?  
21 Q. Yes, precinct delegate.  
22 A. Last year during the August primary.  
23 Q. Why did you want to become a precinct delegate?  
24 A. From my time attending meetings with KGOP and wanting to do  
25 more affirmative things, that seemed like a good match for me

1 to become more involved.

2 Q. What is a precinct delegate in your own words?

3 A. Somebody who represents -- not represents, but communicates  
4 information from the party to the citizens of the precinct  
5 that I live in and that I represent and also to attend state  
6 conventions if the opportunity affords it -- is afforded to  
7 me.

8 Q. Do you see any other role as a precinct delegate?

9 A. Also county convention.

10 Q. Is there any other role that you see as a precinct delegate?

11 A. No.

12 Q. When you filed your affidavit of candidacy, which I assume you  
13 did, with the Kalamazoo County Clerk's office, did you check a  
14 box regarding party affiliation?

15 A. I don't recall.

16 Q. When did you become a member of the Kalamazoo County  
17 Republican Committee?

18 A. In 2022.

19 Q. When did you -- when were you elected to serve on the  
20 Executive Committee?

21 A. I believe that was the November convention that was delayed  
22 until December because of weather.

23 Q. And you're saying 2022, is that correct?

24 A. Yes.

25 Q. When you were elected to serve on the Executive Committee, did

1       you make an oath of office?

2 A.    I believe so. I don't recall specifically, but I believe so.

3                   (Exhibit 2 marked for identification.)

4 BY MR. DePERNO:

5 Q.    I'm going to hand you Exhibit 2. Does this look familiar to  
6        you?

7 A.    Yes, it sounds familiar.

8 Q.    Can you acknowledge that this was the oath of office that you  
9        took upon being elected as an executive member or as a member  
10       of the Executive Committee?

11 A.   I would presume I did, but I don't have specific memory that I  
12       did.

13 Q.   Did you make any objection to this oath of office?

14 A.   No.

15 Q.   Did anyone train you on what it means to be a precinct  
16       delegate?

17 A.   Train me specifically? No.

18 Q.   Have you ever attended any training regarding precinct  
19       delegates?

20 A.   I've attended some meetings.

21 Q.   Okay. Have you ever attended any meetings that specifically  
22       stated they were for training purposes for precinct  
23       delegates?

24 A.   I wasn't -- I've never been able to because of my travel  
25       schedule.

1 Q. How did you become associated with Sabrina Pritchett-Evans?

2 A. Through my association with KGOP.

3 Q. How did you become associated with Kim Harris?

4 A. Same.

5 Q. How did you become associated with Joel Studebaker?

6 A. Met him at the state convention in February.

7 Q. Had you talked to him prior to the February 17 through 18  
8 state convention?

9 A. No.

10 Q. Had you ever communicated with him prior to that convention?

11 A. No.

12 Q. How did you become associated with Ken Beyer?

13 A. Same.

14 Q. Had you ever communicated with Ken Beyer before the  
15 February 17 to 18 state convention?

16 A. No.

17 Q. How did you become associated with Anna Kamp?

18 A. I don't know that name.

19 Q. How did you become associated with Michael Labadie?

20 L-a-b-a-d-i-e.

21 A. Again, I don't recognize that name.

22 (Exhibit 3 marked for identification.)

23 BY MR. DePERNO:

24 Q. Handing you number 3. This was a subpoena you were also  
25 served with. Do you recall this subpoena? It's for

1 appearance at a July 3rd hearing?

2 A. Yes.

3 Q. And do you recall that you were served this along with the  
4 prior subpoena?

5 A. Yes.

6 Q. And just so you understand, the July 3rd date has been  
7 adjourned.

8 A. Yes.

9 Q. I wasn't sure you were aware of that or not, so I wanted to  
10 advise you of that. We do not have a rescheduled date, but  
11 Judge Bell indicated that it would probably be in September.

12 A. Okay.

13 (Exhibit 4 marked for identification.)

14 BY MR. DePERNO:

15 Q. Handing you Exhibit 4. At the bottom is a message it  
16 appears that you sent to Kim Harris where you state, "No  
17 precinct delegate is beholden to a county political party  
18 organization. Pretty simple." Did you write that message?

19 A. Yes.

20 Q. Why is it that you believe that a precinct delegate is not  
21 beholden to a county political party organization?

22 A. Because they're elected independently.

23 Q. So you don't recall that on your affidavit of candidacy that  
24 you were required to select a political party in order to be  
25 placed on the ballot for the election for precinct delegate?

1 MR. HESSEN: Objection, lack of foundation. You can  
2 go ahead and answer.

3 THE WITNESS: I don't recall it specifically, but it  
4 makes sense that it would be there.

5 BY MR. DePERNO:

6 Q. So even if you had checked that box, stating that you were  
7 affiliated with the Republican party, you still believe that  
8 you as a precinct delegate are not beholden to the county  
9 political party organization?

10 A. That's my belief.

11 Q. And why do you believe that?

12 A. It's just my belief.

13 Q. Do you think precinct delegates do the work to help support  
14 the political organization?

15 A. Yes.

16 Q. So if you're not beholden to a county political party  
17 organization, why even get involved as a precinct delegate?

18 A. Because it's a good way to support local Republican  
19 activities.

20 Q. So does it stand to reason then that if you are not associated  
21 with the Republican party or don't care to be, do you believe  
22 you could still be a precinct delegate for the Republican  
23 party?

24 A. Yes.

25 Q. What if you're a member of the U.S. Taxpayer party? Could you

1 still be a Republican precinct delegate?

2 MR. HESSEN: Objection, lack of foundation. Go  
3 ahead if you can answer it.

4 THE WITNESS: I don't believe so.

5 BY MR. DePERNO:

6 Q. Why not?

7 A. Because you're not declaring for a Republican.

8 Q. What if you associate with the Reform party? Could you be a  
9 precinct delegate for the Republican party?

10 A. I don't believe so.

11 Q. So how does that square then with this text message that you  
12 sent?

13 A. I guess I don't know.

14 Q. Do you understand that Kim Harris, who's a plaintiff in this  
15 lawsuit, has declared herself to be a precinct delegate  
16 captain for Kalamazoo County?

17 A. I've heard that terminology.

18 Q. Do you recognize Kim Harris as a precinct delegate captain for  
19 Kalamazoo County?

20 A. I don't know if precinct delegate captain is an actual  
21 position.

22 Q. Okay. Regardless of whether it is or not, do you recognize  
23 her as a precinct delegate captain for Kalamazoo County?

24 A. I think she's a leader.

25 Q. Do you report to her?

1 A. No.

2 Q. Have you ever seen Kim Harris's training materials?

3 A. I don't believe so.

4 (Exhibit 5 marked for identification.)

5 BY MR. DePERNO:

6 Q. I'll hand you number 5 which says, "Subject: Michigan America  
7 First Precinct Delegate Information." Have you ever seen this  
8 e-mail?

9 A. I don't believe so.

10 Q. It was sent April 1, 2022. It sounds to me like you were at  
11 least involved in the Kalamazoo County Republican Party at  
12 that time, correct?

13 A. I would say that may be around the time when I first stopped  
14 in I believe a Saturday morning and Mr. Coss was there and I  
15 spoke to him. I don't know the specific date, but it was in  
16 the spring of 2022. And I definitely wouldn't have known Kim  
17 Harris at that time.

18 Q. In this it states in the second sentence, "We are attempting  
19 to build a Precinct Delegate force across our state to remove  
20 all RINOs and their useless pawns from party leadership at the  
21 county, district and state committee levels. This is the only  
22 way to truly save our counties, states and country from the  
23 tyranny we see all around us!" Do you agree with that  
24 statement?

25 A. No.

1 Q. In what way do you not agree with it?

2 A. I believe regardless of what any of us think, we should always  
3 try to work together.

4 Q. Do you know who the RINOs are?

5 MR. HESSEN: Object to the form of the question.

6 It's vague.

7 BY MR. DePERNO:

8 Q. Do you know what a RINO is?

9 A. I know what the acronym stands for.

10 Q. What does it stand for?

11 A. Republican in name only, I believe.

12 Q. Okay. Do you hold to the belief that the precinct's delegates  
13 must be a force to remove RINOs from the party?

14 A. Do I agree with that?

15 Q. Yes.

16 A. No.

17 Q. Do you think -- is your philosophy more of an inclusive  
18 philosophy or an exclusionary philosophy within politics in  
19 the party?

20 A. Inclusionary.

21 Q. Have you ever had a conversation with Kim Harris regarding the  
22 idea of removing all RINOs from the party?

23 A. Not that I recall.

24 Q. If you'll look at the next page, this talks about being what's  
25 termed a "Michigan America First Delegate" and talks about

1 "Taking over control of your county convention," stating, "We  
2 are in a War" and using the term "Weapons of War." Do you  
3 agree with that imagery?

4 A. No.

5 Q. What do you believe "America first" stands for?

6 A. Conservative values.

7 Q. When you ran to be the secretary for District 4 with the  
8 election being February 17th, you ran as an America First  
9 candidate, correct?

10 A. Yes.

11 Q. Does America First mean anything else to you other than being  
12 a conservative?

13 A. I don't believe so.

14 Q. When did you first meet Christine Augustine?

15 A. Specifically I can't recall, but it would have been in 2022  
16 through the KGOP.

17 Q. Have you ever had a conversation with Christine Augustine  
18 regarding tactical civics?

19 A. No.

20 Q. Have you ever had a conversation with Christine Augustine  
21 regarding taking over the county party?

22 A. Not that I recall.

23 Q. Have you ever had a conversation with Sabrina Pritchett-Evans  
24 regarding taking over the county party?

25 A. Not that I recall.

1 Q. Have you ever had a conversation with Kim Harris regarding  
2 taking over the county party?

3 A. Not that I recall.

4 Q. Kelly Sackett and Charley Coss were elected to Kalamazoo  
5 County Republican Committee leadership in December. Do you  
6 recall that?

7 A. I do.

8 Q. Did you support Kelly and Charley in their election to be  
9 chair and vice chair?

10 A. No.

11 Q. Who did you support?

12 A. I believe I supported Sabrina Pritchett-Evans.

13 Q. And why did you support Sabrina?

14 A. At the time I thought she more aligned with my values or my  
15 beliefs.

16 Q. And do you still believe that today?

17 A. I'm unsure.

18 Q. After that December election for chair and vice chair, did  
19 you start having discussions with Sabrina Pritchett-Evans  
20 regarding removal of Kelly Sackett and Charley Coss?

21 A. Not that I recall.

22 Q. Have you ever had a conversation regarding the removal of  
23 Kelly Sackett and Charley Coss?

24 MR. HESSEN: From the position that they were  
25 elected to in December?

1 MR. DePERNO: That's correct. I'll rephrase. Thank  
2 you.

3 BY MR. DePERNO:

4 Q. Did you ever have a conversation with anyone regarding the  
5 removal of Kelly Sackett and Charley Coss from their elected  
6 positions as chair and vice chair?

7 A. I'm sure I have.

8 Q. Do you recall anything specific?

9 A. No.

10 Q. Why would you want to remove Kelly Sackett and Charley Coss  
11 from their elected positions as chair and vice chair?

12 MR. HESSEN: Objection. It's a compound question.

13 MR. DePERNO: In what way?

14 MR. HESSEN: It could be two different answers for  
15 the two different people.

16 MR. DePERNO: Okay.

17 BY MR. DePERNO:

18 Q. We'll start with Kelly Sackett. Why would you want to remove  
19 Kelly Sackett from her elected position as chairwoman of the  
20 Kalamazoo County Republican Committee?

21 A. A couple reasons. One is personal. I believe -- as a veteran  
22 I believe she was exclusionary towards me because she often  
23 referred to "her veterans" in regards to two individuals and  
24 then with the election of statutory EC members.

25 Q. Did you ever have a conversation with Kelly Sackett about your

1 first point being personal and exclusionary to veterans?

2 A. No.

3 Q. Why didn't you approach Kelly Sackett and talk about that  
4 issue?

5 A. No good reason.

6 Q. Okay. Have you ever approached Kelly Sackett to talk about  
7 your issue regarding statutory Executive Committee members?

8 A. No.

9 Q. Why not approach Kelly Sackett and have a conversation if  
10 there was something that she did that offended you?

11 A. Because I didn't think there would be any point to it.

12 Q. Why didn't you think there would be a point to it?

13 A. That was just my feeling.

14 Q. Regarding Charley Coss, why did you want to remove Charley  
15 Coss from his elected position as vice chair for the Kalamazoo  
16 County Republican Committee?

17 A. I don't think I ever specifically stated anything about  
18 Charley Coss.

19 Q. Do you have any personal issues with Charley Coss?

20 A. No.

21 (Exhibit 6 marked for identification.)

22 BY MR. DePERNO:

23 Q. I'm handing you number 6 which is a flyer. It says at the  
24 top, "America First District 4." Was this a flyer that you  
25 used during your campaign to run for secretary of the

1 District 4 committee?

2 A. I suppose so, yes.

3 Q. Who put this flyer together?

4 A. I don't specifically know or remember anyway.

5 Q. Did you prepare it?

6 A. No.

7 Q. Who asked you to be a part of this so-called slate for

8 District 4?

9 A. If I remember I received a call. I don't recall from who. It

10 was a woman, telling me that I had been drafted to run for

11 District 4 secretary and hoped that I would.

12 Q. Do you recall that person's name?

13 A. Not specifically.

14 Q. Was it Anna Kamp?

15 A. I don't know that name.

16 Q. So can you specifically say it was not Anna Kamp?

17 A. Yes.

18 Q. But you don't recall the name of the person who called you?

19 A. No. I will say it's one of the ladies from Richland.

20 Q. And who are the ladies from Richland?

21 A. So Veronica Pero, Renee Saar, Sandra VanderLugt. I believe it

22 was one of those three, but I can't say for sure which one.

23 Q. Did you ask any questions about why you had been drafted to

24 participate in this slate?

25 A. I'm sure I did. I don't recall what they would have been,

1       though.

2 Q.   Do you have any other recollection of that telephone call?

3 A.   No.

4 Q.   Did you understand the process by which you would be elected  
5       as secretary for District 4?

6 A.   I didn't really understand it until I arrived at the Lansing  
7       Center on the 17th.

8 Q.   And describe to us what your understanding was of the process  
9       by which you would be elected.

10 A.   At the February 17th caucus that there would be a vote  
11       amongst -- for the entire caucus to elect the officers for  
12       District 4.

13 Q.   And who would participate in that vote?

14 A.   Precinct delegates from around the district.

15 Q.   Did you not understand that the first step in your election  
16       process would be to win a caucus, a majority vote, in a  
17       break-out group of Kalamazoo County delegates?

18 A.   Not specifically, but I remember I did contact Kelly Sackett  
19       and let her know that I had put my name in to be on the  
20       ballot.

21 Q.   So you're telling us today that you were not informed that at  
22       the February 17th district caucus each county would break out  
23       into separate groups and hold separate elections among county  
24       delegates for these elections?

25 A.   I suppose that's true.

1 Q. Does that make sense to you that each county would have the  
2 ability to elect their representatives to go to the district  
3 executive committees and state committee?  
4 A. That doesn't square with what my understanding was at that  
5 time.  
6 Q. And what is your understanding exactly?  
7 A. Is that that would have happened prior to the convention or  
8 prior to the state convention at the county convention or  
9 prior to that date.  
10 Q. Had you done any campaigning for this election that you were  
11 involved in?  
12 A. No.  
13 Q. You didn't call any Kalamazoo County delegates?  
14 A. I did not.  
15 Q. So is it fair to say then that walking into that room on  
16 February 17th you had no idea whether you had support or not  
17 support?  
18 A. That is true.  
19 Q. Who did you travel to the state convention with on Friday,  
20 February 17th?  
21 A. Just myself.  
22 Q. Were you aware that there were District 4 caucus rules agreed  
23 to by the District 4 county chairs prior to the February 17th  
24 caucus?  
25 A. I had heard that, yes.

1 Q. Did you have a chance to review them prior to the  
2 February 17th caucus?

3 A. No.

4 Q. Did you discuss the rules with anybody prior to the  
5 February 17th caucus?

6 A. Prior to that date? No.

7 (Exhibit 7 marked for identification.)

8 BY MR. DePERNO:

9 Q. Handing you Exhibit 7. This is -- page 1 is the 4th District  
10 Caucus Agenda and page 2 and 3 are the 4th District Committee  
11 Rules and Procedures. Have you ever seen these documents  
12 before?

13 A. I guess I have to say I don't recall.

14 Q. I want to turn your attention to page 3. There is a specific  
15 rule. It's referred to commonly as Rule 9. It's titled  
16 "Nomination Process for State and District Committee  
17 openings." Are you familiar with Rule 9?

18 A. Yes.

19 Q. Did you have an objection to Rule 9 as written in this  
20 document?

21 A. Yes.

22 Q. What was your objection?

23 (Short pause.)

24 A. My objection was that the nominations for Kalamazoo County  
25 hadn't been discussed openly.

1 Q. Had they been discussed openly in other counties?

2 A. It's my understanding --

3 MR. HESSEN: Objection, lack of foundation. Go  
4 ahead. You can answer.

5 THE WITNESS: My understanding is yes.

6 BY MR. DePERNO:

7 Q. It's your understanding that the -- when you say yes, does  
8 that mean for every other county except Kalamazoo County?

9 A. It's my understanding.

10 Q. And what do you mean by discussed openly? Can you clarify?

11 A. I was told that the other counties had made those nominations  
12 in their county convention.

13 Q. Who told you that?

14 A. Specifically I don't recall.

15 Q. Can you identify when you may have heard this?

16 A. I believe it was on Friday the 17th.

17 Q. Can we narrow it down? Do you know if this was a man or a  
18 woman who told you this?

19 A. Woman.

20 Q. Does that help you refresh your memory in terms of who it may  
21 have been that made the statement to you?

22 A. I received a call on Friday the 17th from Kim Harris and  
23 Sabrina Pritchett-Evans.

24 Q. Early in the day or late in the day?

25 A. Early in the day.

1 Q. And what specifically -- was it one phone call where they were  
2 both on the phone?

3 A. Yes.

4 Q. And what do you recall about that conversation? What did they  
5 specifically tell you?

6 A. They asked me to make the motion that I made at the Friday  
7 night caucus and why.

8 Q. What is the why?

9 A. What I already explained.

10 Q. So you're saying Kim Harris and Sabrina Pritchett-Evans asked  
11 you to make a motion because other counties made nominations  
12 in their county conventions, is that right?

13 A. More or less.

14 Q. Did you ask any questions at that time of Sabrina Pritchett or  
15 Kim Harris?

16 A. I don't recall.

17 Q. And you agreed to make the motion?

18 A. I did.

19 (Exhibit 8 marked for identification.)

20 BY MR. DePERNO:

21 Q. Number 8 is an exhibit which is titled "Bill Bennett statement  
22 on February 17, 2023." Can you please read this? And I'd  
23 like you to acknowledge, if you could, whether this is the  
24 statement that you made.

25 A. "So the reason I made the motion was because of our Executive

1 Committee meeting on Monday night, primarily. And at that  
2 meeting, an illegal vote was held to fill statutory executive  
3 committee seats that were vacant to just a straight vote at  
4 the county level and that's in violation of state law MCL  
5 158.198. According to that the only way that those statutory  
6 seats can be filled is through a special election to elect  
7 people for those seats, the elected seats and that can only be  
8 called by the governor and cannot just be done willy-nilly at  
9 any of our county level organizations. And I'm afraid, the  
10 concern is, is that when we caucus as a county that some sort  
11 of activity will reoccur in our caucus and we can't get a fair  
12 shake."

13 Q. Do you recall that this is the statement that you made at the  
14 February 17th, 2023 caucus?

15 A. That sounds correct.

16 Q. Were you aware that delegates from other counties, including  
17 Ottawa County, were going to support your motion to set aside  
18 Rule 9 for Kalamazoo County?

19 A. Yes.

20 Q. How did you become aware that other delegates from other  
21 counties would support your motion?

22 A. At a brief meeting on Friday the 17th before the caucus  
23 convened.

24 Q. Who was present at that meeting?

25 A. Lots of people, but primarily Joel Studebaker, Ken Beyer,

1 Sabrina Pritchett-Evans, Kim Harris, Veronica Pero, Sandra  
2 VanderLugt. That's all I can say for sure. But there were a  
3 lot of people.

4 Q. Would you describe any of those people in particular as being  
5 the most vocal?

6 A. From what I recall I don't think any one person did.

7 Q. Was there anyone you recall who was the driving force behind  
8 this process to set aside Rule 9?

9 A. No, I don't believe so.

10 Q. And what did you hope to accomplish by making the motion  
11 to exclude Kalamazoo County delegates from Rule 9 on  
12 February 17th?

13 A. To have open nominations on the caucus floor.

14 Q. The first part of your statement references an "Executive  
15 Committee meeting on Monday night, primarily" is what you  
16 state. What is that in reference to?

17 A. An Executive Committee meeting held earlier that week.

18 Q. Do you remember what day that was? You say Monday. So if  
19 Friday was the 17th, then Monday would be the 13th?

20 A. Sounds right.

21 Q. And were you present at that Monday night Executive Committee  
22 meeting?

23 A. I guess I can't recall for certain if I was or not.

24 Q. Okay. And yet it seems your entire process was based on a  
25 disagreement you had regarding what happened that Monday

1 night. Are you now stating that you weren't there?

2 A. Honestly, I would have to look at my calendar.

3 Q. Do you have your calendar with you?

4 A. I do.

5 Q. Are you opposed to looking at it now to verify whether you

6 were in attendance?

7 A. No.

8 Q. You don't want to look at it?

9 A. No, I'm not opposed to it.

10 Q. Okay. Can you look at it?

11 (Short pause.)

12 A. It's on my calendar, so I have to assume I was there, but I

13 also had a really busy day that day.

14 Q. Well, do you recall Kelly Sackett giving a lengthy discussion

15 that evening about how nominations would be open and

16 transparent on February 17th when the counties broke into

17 caucuses?

18 A. No.

19 Q. You don't recall that at all?

20 A. No.

21 Q. You state that "at that meeting, an illegal vote was held to

22 fill statutory Executive Committee seats." Can you explain

23 what was illegal about the vote to fill statutory Executive

24 Committee seats?

25 A. My understanding is that statutory EC members can only be

1       elected in conjunction with running for a county or state  
2       position during the August primary.

3 Q.   And how did you come to that conclusion?

4               MR. HESSEN: Let me object to the extent that you  
5       can answer it without any guidance from an attorney. You're  
6       using the term legal and you're referring to the statute. If  
7       you got advice from an attorney, I'm going to tell you not to  
8       answer it because of privilege. If you formed an opinion  
9       separate from a lawyer, you can go ahead and answer it.

10              THE WITNESS: I formed my opinion by reviewing the  
11       appropriate MCL.

12 BY MR. DePERNO:

13 Q.   And do you know what MCL that was?

14 A.   Sitting here right now off the top of my head I'd have to  
15       refer to what's in the statement here. I don't have it  
16       written down in front of me.

17 Q.   Do you recall it could have been MCL 168.599? Or is it  
18       MCL 158.198?

19 A.   I don't -- I don't know.

20 Q.   Are you accusing people of a crime?

21 A.   No.

22 Q.   So when you use the term "illegal" you're using the term in  
23       the sense of violating a statute, but not a crime, correct?

24 A.   I guess a better word would have been inappropriate.

25 Q.   And you stated that, "According to that the only way that

1 those statutory seats can be filled is through a special  
2 election to elect people for those seats." And then you state  
3 that "that can only be called by the governor." Does that  
4 remain your belief today?

5 A. As I understand it.

6 Q. Can you tell us how the vote to fill statutory seats was  
7 illegal under MCL 168.198?

8 A. Again, my understanding was that it could -- statutory  
9 Executive Committee members could only be elected in  
10 conjunction with a primary vote, general election primary.

11 Q. Are you suggesting that the governor has to call a special  
12 election for a county political party to fill empty seats on  
13 its Executive Committee?

14 A. I'm saying that at the time I believe that was one of the  
15 options.

16 Q. Did you check into the Republican party history regarding a  
17 county's ability to fill a statutory seat on its Executive  
18 Committee?

19 A. The Republican party history?

20 Q. Correct.

21 A. No.

22 Q. Did you contact anybody at MiGOP regarding the ability of  
23 a county political party to fill a statutory seat on its  
24 Executive Committee?

25 A. Not that I recall.

1 Q. So sitting here today you can't tell us how many times in the  
2 last 35 years a county Executive Committee has filled an empty  
3 statutory seat across 83 counties, can you?

4 A. Correct.

5 Q. And by your own testimony you only became involved in the  
6 party in 2022, right?

7 A. Correct.

8 Q. And without checking on any party history or any procedures  
9 regarding filling statutory seats, you decided to make a  
10 motion on February 17th to set aside a rule because you were  
11 upset with the process of filling statutory seats?

12 MR. HESSEN: Hold on a second. I object. It's  
13 argumentative, it's assuming facts not in evidence, lack of  
14 foundation. Go ahead if you can answer it.

15 THE WITNESS: Can you restate it, please?

16 BY MR. DePERNO:

17 Q. Well, you've already stated that you only became part of the  
18 party in 2022. And without discussing with anyone within the  
19 party, MiGOP or within the county, regarding the historical  
20 process of filling statutory seats on an Executive Committee,  
21 you decided to make a motion on February 17th to set aside  
22 Rule 9?

23 MR. HESSEN: Same objections.

24 THE WITNESS: As you stated it, yes.

25

1 BY MR. DePERNO:

2 Q. Did you have any concern regarding the division that  
3 would occur by making the motion to set aside Rule 9 on  
4 February 17th?

5 MR. HESSEN: Objection, lack of foundation. Go  
6 ahead and answer it if you can.

7 THE WITNESS: I believed at the time that the  
8 division had already occurred.

9 BY MR. DePERNO:

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

11 MR. HESSEN: Objection, lack of foundation. Go  
12 ahead if you know.

13 THE WITNESS: It's a member of the Executive  
14 Committee who is not elected at the county convention, but  
15 rather is -- I guess the word I would use is appointed because  
16 of having run for county or state legislative elections.

17 (Exhibit 9 marked for identification.)

18 BY MR. DePERNO:

19 Q. Have you ever read the bylaws for the Republican Party of  
20 Kalamazoo County?

21 A. Yes.

22 Q. Article III, Section 3, deals with membership of the Executive  
23 Committee. Are you familiar with this section?

24 A. Yes.

25 Q. And according to your understanding, what is the membership of

1 the Executive Committee?

2 A. It's what I've already stated, which is folks elected at the  
3 county convention and also statutory members.

4 Q. And how many statutory members are there on the Executive  
5 Committee for Kalamazoo County?

6 A. Specifically I don't know.

7 Q. And how many elected members are on the Executive Committee?

8 A. I don't know.

9 Q. Well, the bylaws state in Section 3A that the statutory  
10 members shall be a number equal to persons nominated in the  
11 last two preceding fall primary elections. Do you agree with  
12 that?

13 MR. HESSEN: Do you agree that that's what the  
14 bylaws say?

15 MR. DePERNO: Yes.

16 THE WITNESS: Yes.

17 BY MR. DePERNO:

18 Q. Okay. And if I tell you -- and I'm not trying to trick you,  
19 but I'm telling you that the number established by Kalamazoo  
20 County regarding 3A is 18. So there's 18 statutory members.

21 A. Okay.

22 Q. Section B then states that the elected members shall be a  
23 number equal to the statutory number. Do you agree with  
24 that?

25 MR. HESSEN: Do you agree that that's what the

1       bylaws say?

2                   THE WITNESS:  Yes.

3 BY MR. DePERNO:

4 Q.    So in that context you'd have 18 statutory members and  
5        18 elected members.  What happens when a statutory member  
6        resigns?

7                   MR. HESSEN:  Objection, lack of foundation.  
8        Go ahead if you know.

9                   THE WITNESS:  My understanding is that that seat  
10        remains vacant until the next primary election.

11 BY MR. DePERNO:

12 Q.    And yet the bylaws require an equal number of statutory  
13        members and elected members, correct?

14 A.    That's what the bylaws say.

15 Q.    And would you consider yourselves -- would you consider  
16        yourselves a grassroot Republican?

17                   MR. HESSEN:  Objection, vague.  If you can answer it  
18        answer it.

19                   THE WITNESS:  I guess I don't know.

20 BY MR. DePERNO:

21 Q.    Okay.  Do you understand what the term grassroots means?

22 A.    No.

23 Q.    Do you have any issue with the way elected representatives  
24        vote in Lansing?

25                   MR. HESSEN:  Objection, vague.

1 THE WITNESS: I would say as much as anybody does on  
2 an issue-by-issue basis.

3 BY MR. DePERNO:

4 Q. Do you sometimes feel like your elected representatives don't  
5 listen to you?

6 A. Of course.

7 Q. Do you sometimes feel like your elected representatives go to  
8 Lansing and they don't fulfill their campaign promises?

9 A. Of course.

10 Q. Sometimes they promise you, for instance, that they care about  
11 gun rights and then they go to Lansing and vote with the  
12 Democrats on bills that strip people's gun rights? Do you  
13 agree with that?

14 A. Hypothetically, yes.

15 Q. And you recognize -- do you recognize that statutory members  
16 on Executive Committees across the state are our elected  
17 representatives in large part, correct?

18 A. Makes sense.

19 Q. Okay. And the elected members who are elected at county  
20 conventions who are delegates, correct, they -- most people  
21 would like to have an equal number of those elected members as  
22 statutory members. Does that make sense?

23 MR. HESSEN: Objection, lack of foundation. You're  
24 asking the witness to opine on what the world at large wants  
25 to do and I don't think that's a fair question. If you can

1 answer it, answer it.

2 MR. DePERNO: I can rephrase.

3 BY MR. DePERNO:

4 Q. According to the bylaws, don't you agree that there should be  
5 equal representation between the statutory members and elected  
6 members?

7 A. Generally speaking, yes.

8 Q. And if certain statutory members resign or don't participate  
9 or don't assume the office as Executive Committee members,  
10 doesn't the county party have a duty to fill those seats to  
11 make equal representation?

12 MR. HESSEN: I object. You're asking the witness  
13 to form a legal conclusion. If you're asking for his  
14 understanding, that's okay.

15 MR. DePERNO: Well, I'm asking for his  
16 understanding.

17 THE WITNESS: Without violating the law, sure.

18 BY MR. DePERNO:

19 Q. So how do you remedy the situation in your mind when you have  
20 an unequal number of statutory versus executive members on  
21 your committee when your bylaws require that number to be  
22 equal?

23 MR. HESSEN: Objection, that assumes facts not in  
24 evidence, but if you can answer, go for it.

25 THE WITNESS: Again, my understanding is that if

1       there's an Executive Committee statutory member vacancy, that  
2       can only be filled at the next general election, primary.

3 BY MR. DePERNO:

4 Q.   And am I correct to state that you were offended that the  
5       Executive Committee filled three statutory seats?

6 A.   Yes.

7 Q.   And are you offended strictly because you believe there was a  
8       violation of a statute or is there something else?

9 A.   I guess I'd have to say violation of a statute, my  
10      understanding of it.

11 Q.   Is there anything else about filling three statutory seats  
12      that offended you?

13 A.   No.

14 Q.   Is there anything in the Kalamazoo County bylaws that  
15      prohibits the Executive Committee from filling those statutory  
16      seats?

17               MR. HESSEN: Objection, lack of foundation.

18               THE WITNESS: Can I ask a question about the bylaws?

19 BY MR. DePERNO:

20 Q.   Sure.

21 A.   What's the date of these? Because there were several versions  
22      of the Kalamazoo County GOP bylaws floating around.

23 Q.   Well, I think if you look at the last page, page 9 tells you  
24      that this was last amended March 2, 2015.

25 A.   Okay.

1 Q. And I can tell you that my understanding is that these are the  
2 most recent amendments.

3 A. So can you restate your question, please? Or just repeat it,  
4 I mean, not restate it.

5 Q. The question was, is there anything within the Kalamazoo  
6 County bylaws that prevents the Executive Committee from  
7 filling statutory seats?

8 MR. HESSEN: Same objection.

9 THE WITNESS: I would say 6A.

10 BY MR. DePERNO:

11 Q. And is that the only section you can point to that would  
12 support your position?

13 MR. HESSEN: Do you want him to read the entire  
14 bylaws?

15 MR. DePERNO: No. I asked him if he was familiar  
16 with them and I assume he is.

17 THE WITNESS: I'm familiar. I don't have them  
18 memorized.

19 BY MR. DePERNO:

20 Q. I don't have a problem with you taking time to read them if  
21 that's what you need to do. I'm not trying to trick you in  
22 any way.

23 A. I just don't want to answer incorrectly, that's all.

24 Q. Of course.

25 (Short pause.)

1 A. So, yes, I would point to 6A.

2 Q. Do you believe or do you agree that the Kalamazoo County  
3 Republican Committee runs itself and polices itself from  
4 everything in how it chooses to organize, operate, and how it  
5 chooses to compose itself?

6 A. Yes.

7 MR. HESSEN: Objection, compound.

8 THE WITNESS: Sorry?

9 MR. HESSEN: I said objection, compound. If you can  
10 answer it, answer it.

11 THE WITNESS: Yes.

12 BY MR. DePERNO:

13 Q. Do you have any understanding that based on prior MiGOP  
14 history, Executive Committees that have vacancies and  
15 statutory vacant seats can simply designate a person as a  
16 replacement nominee?

17 A. I'm not familiar with that.

18 Q. And then through that process as designating somebody as a  
19 replacement nominee, a motion can be brought to the floor  
20 during an Executive Committee meeting to nominate people to  
21 fill those empty seats as replacement nominees?

22 A. I'm not familiar with that.

23 Q. Would you agree that because you already stated that the party  
24 can police itself, a majority vote by the Executive Committee  
25 is sufficient to designate a person as a replacement nominee

1 to fill a statutory seat?

2 MR. HESSEN: Objection, lack of foundation. Go  
3 ahead.

4 THE WITNESS: So long as it doesn't violate a  
5 statute.

6 BY MR. DePERNO:

7 Q. Do you think a statute has controlling authority over the  
8 county bylaws?

9 A. My opinion is yes.

10 Q. So essentially either a committee could meet, the Executive  
11 Committee could meet and say, "We're filling these spots," or  
12 they could meet as a committee and say, "We're calling these  
13 people replacement nominees for the former statutory members  
14 who resigned," and they then become statutory members. The  
15 net result is the same, correct?

16 MR. HESSEN: Objection, compound and lack of  
17 foundation. Answer if you can answer it.

18 THE WITNESS: I don't believe that's true.

19 BY MR. DePERNO:

20 Q. When you made the motion to set aside Rule 9, did you  
21 understand that you were taking away the right of Kalamazoo  
22 County delegates to caucus amongst themselves and vote for  
23 their preferred nominee for state committee?

24 A. I don't believe that's what I did.

25 Q. Did Kalamazoo County delegates have the ability to vote

1 separately as a county on their nominee for state committee?

2 A. No.

3 Q. In looking back on it, do you have any regret at all about  
4 making that motion which took away those delegates' right to  
5 caucus?

6 MR. HESSEN: Objection, calls for a legal  
7 conclusion, but if you can answer it, answer it.

8 THE WITNESS: No, I don't have any regrets.

9 BY MR. DePERNO:

10 Q. What would you say to Kalamazoo County delegates who feel like  
11 you disenfranchised them by taking away their right to caucus  
12 and vote as a county on the county nominee?

13 MR. HESSEN: Objection, lack of foundation, calls  
14 for a legal conclusion, too. Go ahead.

15 THE WITNESS: I would say I made a motion and it  
16 passed by more than a two-thirds vote.

17 BY MR. DePERNO:

18 Q. And you recognize that people who were voting amongst those  
19 two-thirds were people from other counties, correct?

20 A. Correct.

21 Q. And, therefore, those people who were voting from other  
22 counties then, because of your motion, were able to  
23 essentially elect the Kalamazoo County nominees for state  
24 committee, correct?

25 A. I don't agree with that.

1 Q. Did Kalamazoo County delegates have a vote in the Ottawa  
2 County nominees for state committee?

3 A. No.

4 Q. Did the Ottawa County delegates have a vote in the Kalamazoo  
5 County nominees for state committee?

6 A. Yes.

7 Q. Does that not in your mind violate the one person, one vote  
8 rule?

9 A. No.

10 Q. Do you care about election integrity issues?

11 A. Of course.

12 Q. How can you square the fact that you say you care about  
13 election integrity issues yet not care about the fact that you  
14 made a motion to strip away the rights of Kalamazoo County  
15 delegates to caucus and vote for their nominee?

16 MR. HESSEN: I object to the form of the question  
17 and it's also argumentative. Go ahead if you can answer it.

18 THE WITNESS: I felt like we had been wronged and  
19 that was a remedy for it.

20 BY MR. DePERNO:

21 Q. So the ends justify the means?

22 MR. HESSEN: Objection, argumentative, lack of  
23 foundation. Go ahead.

24 THE WITNESS: I can't -- I don't know.  
25

1 BY MR. DePERNO:

2 Q. Do you believe a county political party has a right to control  
3 its membership?

4 A. Yes.

5 Q. So if a Democrat or third-party person infiltrates into the  
6 party, what do you think can be done about that?

7 MR. HESSEN: Objection, lack of foundation.

8 THE WITNESS: I guess I would refer to the  
9 administrative rules and the bylaws.

10 BY MR. DePERNO:

11 Q. Do you think the county party has a right to punish or  
12 discipline people who act against the interest of the county  
13 party?

14 A. Again, according to the bylaws, yes.

15 Q. Article III, Section 7E I think on page 3 is the section of  
16 the bylaws that deals with removal of an elected member from  
17 the Executive Committee. Are you familiar with this  
18 section?

19 A. Yes.

20 Q. This section states that "A motion to consider the removal of  
21 an Elected Member from the Executive Committee requires a  
22 two-thirds vote of the Elected Members present at a regular  
23 meeting of the committee." Do you agree?

24 A. That's what it says.

25 Q. Do you recall a meeting on March 1st where two-thirds of the

1 elected members voted to remove you from the Executive  
2 Committee?

3 A. Yes. I'd have to -- I'd want to look at my calendar, but it  
4 sounds right, the date, the specific date.

5 (Exhibit 10 marked for identification.)

6 BY MR. DePERNO:

7 Q. Handing you Exhibit 10. Following the meeting on March 13th  
8 you received a letter dated March 14th, which is the first  
9 page of this. Do you agree?

10 A. Yes.

11 Q. In this letter you were notified of your right to appear at  
12 the next scheduled meeting of the Executive Committee on  
13 April 10, 2023, correct?

14 A. Yes.

15 Q. Did you appear at that April 10, 2023 meeting?

16 A. Honestly, I don't recall, but I don't think so.

17 Q. Did you send a proxy?

18 A. No.

19 Q. The last page is a letter dated April 17th and this states --  
20 or is your notice that you were removed from the Executive  
21 Committee, correct?

22 A. Yes.

23 Q. Did you receive this letter?

24 A. Yes.

25 Q. Do you dispute that proper procedure was followed in removing

1       you from the Executive Committee?

2               MR. HESSEN: Objection, lack of foundation.

3               THE WITNESS: I seem to remember that some statutory  
4       people voted on the initial vote, but that would be my only  
5       objection, but I didn't object to the removal.

6 BY MR. DePERNO:

7 Q.   Following the state convention on February 17th and 18th,  
8       did you attend Kim Harris's delegate meeting at Juliana's(ph)  
9       restaurant?

10 A.   Again, I don't recall.

11 Q.   Have you heard from any delegates from Kalamazoo County who  
12       have stated that they're angry because you stole their vote?

13 A.   Yes.

14 Q.   Who has told you that?

15 A.   Personally one-on-one nobody, but it was at one of the  
16       precinct delegate meetings at Juliana's restaurant where quite  
17       a few folks showed up and stated that sort of thing.

18 Q.   How did you react to their statements?

19 A.   I don't believe I did react because I saw it as dramatics,  
20       staged dramatics.

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

23 A.   No.

24 Q.   Have you offered to redo the caucus from February 17th of the  
25       39 delegates from Kalamazoo County for the purpose of voting

1 for the -- or re-voting for the district Executive Committee  
2 and state committee seats?

3 A. No.

4 (Exhibit 11 marked for identification.)

5 BY MR. DePERNO:

6 Q. Exhibit 11 is titled "Kalamazoo County Republican Party  
7 Resolution to Censure Bill [sic] Bennett." Did you receive a  
8 copy of this censure?

9 A. Yes.

10 Q. Is there anything within this censure that you disagree  
11 with?

12 (Short pause.)

13 A. I disagree with paragraph 4 because nominations were made from  
14 the floor. And I disagree with the second-to-the-last  
15 paragraph which states I made a false statement.

16 Q. Anything else that you disagree with?

17 A. Well, paragraph 2 says I made a false statement.

18 (Short pause.)

19 I also disagree that the motion reduced the voting  
20 power of Kalamazoo County delegates.

21 (Exhibit 12 marked for identification.)

22 BY MR. DePERNO:

23 Q. Exhibit 12 is a letter you received from Chairwoman Kelly  
24 Sackett dated April 6, 2023. Do you recall this letter?

25 A. Yes.

1 Q. Did you receive it on or about April 6, 2023?

2 A. I can't say for sure.

3 Q. Did you receive it sometime soon after April 6, 2023?

4 MR. HESSEN: Asked and answered.

5 THE WITNESS: I assume so.

6 BY MR. DePERNO:

7 Q. Have you conducted any official business with District 4 in  
8 your position as secretary after you were notified that you  
9 are no longer a delegate?

10 A. Yes.

11 (Exhibit 13 marked for identification.)

12 BY MR. DePERNO:

13 Q. Exhibit 13 are some text messages produced by plaintiff Kim  
14 Harris and yourself. If you go to page 3, near the bottom you  
15 state, "Do you have a game plan in mind for Monday if Cruella  
16 (Kelly) and/or her goons show up?" Why do you refer to -- I  
17 assume you're referring to Kelly Sackett?

18 A. That's correct.

19 Q. Why do you call her Cruella?

20 A. It was intended to be funny, but it wasn't.

21 Q. Who are her goons?

22 A. The people who showed up at one of the precinct delegate  
23 meetings and made a big display, yelled, and screamed.

24 Q. Now, you admitted earlier you never actually approached Kelly  
25 Sackett to talk about any of your disagreements with her and

1 yet you feel it's appropriate to call her Cruella in text  
2 messages?

3 MR. HESSEN: Objection, argumentative. Is there a  
4 question?

5 MR. DePERNO: That was a question.

6 MR. HESSEN: You were just arguing with the witness.

7 BY MR. DePERNO:

8 Q. Page 6 near the top is a text message you apparently wrote  
9 where you discuss not allowing delegates into meetings, is  
10 that correct?

11 MR. HESSEN: Are you referring to the March 20th,  
12 2023 text at 14:54?

13 MR. DePERNO: It starts, "I'll check on the phone  
14 number."

15 MR. HESSEN: Okay. Thank you.

16 THE WITNESS: I'm sorry. What was your question?

17 BY MR. DePERNO:

18 Q. Am I correct that you're discussing your procedure to not  
19 allow delegates into meetings?

20 A. I think it was discussion.

21 Q. Why don't you want delegates to come to meetings?

22 A. Well, I do.

23 Q. Well, your text says you should deny entry to precinct  
24 delegates.

25 A. If they're going to be disruptive. I believe that's what that

- 1 was about, but I can't say for sure.
- 2 Q. On page 8 you are discussing something about a letter to Matt  
3 Hall at the top.
- 4 A. Okay.
- 5 Q. Can you explain what that letter to Matt Hall was about?
- 6 A. I believe it was in regards to the way he had voted on a  
7 particular issue that we collectively were not happy about and  
8 we were writing a letter to him to just express that, if I  
9 recall correctly.
- 10 Q. And was this an issue that was taken up in the 4th district?
- 11 A. I don't recall that it was.
- 12 Q. But you were spending some amount of energy regarding this  
13 letter to Matt Hall, right?
- 14 A. As a resident of his state representative district, yes.
- 15 Q. Was there one person in particular who was in charge of  
16 preparing this letter to Matt Hall?
- 17 A. I believe I did.
- 18 Q. So it was your brainchild?
- 19 A. No, I don't believe so.
- 20 Q. Was it anyone's brainchild then?
- 21 A. I don't recall.
- 22 Q. Have you taken up a motion in District 4 to censure Matt  
23 Hall?
- 24 A. Not that I'm aware of, no.
- 25 Q. Why were you upset about a vote by Matt Hall? Do you recall

1 what that issue was?

2 A. No, I don't.

3 Q. Did it have something to do with gun legislation?

4 A. Possibly, but I don't recall.

5 (Exhibit 14 marked for identification.)

6 BY MR. DePERNO:

7 Q. Exhibit 14 are text messages between you and Sabrina  
8 Pritchett-Evans. Page 3 on February 22 at 5:33 p.m. you  
9 discuss a letter from Attorney Thomas. Do you see that?

10 A. Yes.

11 Q. Did you help draft that letter from Attorney Thomas?

12 A. I guess I don't know which letter it is, but no, I've never  
13 helped him draft any letter.

14 Q. Apparently you were reviewing the letter, correct?

15 A. I don't know which letter it is.

16 MR. DePERNO: We'll mark it.

17 (Exhibit 15 marked for identification.)

18 THE WITNESS: I am familiar with this, yes.

19 BY MR. DePERNO:

20 Q. Okay. Well, these text messages seem to indicate that you had  
21 a role in preparing that letter and making revisions to that  
22 letter.

23 MR. HESSEN: I object to the form of the question.  
24 He has not substantiated that this letter is what this text  
25 message is about. He's testified otherwise, that he doesn't

1 know what the letter is referring to.

2 BY MR. DePERNO:

3 Q. Do you agree that your text messages are in reference to that  
4 letter prepared by Jimmy Thomas?

5 A. Possibly, but I can't say for sure.

6 Q. Do you have a recollection of another letter that you helped  
7 Jimmy Thomas prepare?

8 A. I didn't help him prepare a letter. I may have reviewed a  
9 letter, but I did not help him prepare a letter.

10 Q. You state on page 5 at February 22, 2023, 7:21 p.m., you  
11 say, "I think it's a great letter that hopefully puts Coss,  
12 Sackett, and their henchmen on their heels a bit." Who are  
13 their henchmen?

14 A. I do not know.

15 Q. What do you mean "put them on their heels"?

16 A. I don't recall.

17 Q. On page 13 near the middle of the page on March 13th, you're  
18 discussing your review of two versions of minutes. Do you see  
19 that?

20 A. Yes.

21 Q. Do you recall what minutes you were discussing here?

22 A. I believe -- not specifically, but I would assume it's the  
23 state convention.

24 Q. And who is Emily?

25 A. Emily -- I believe Emily is or was the secretary at the

1 state -- or the caucus.

2 Q. And why do you want to exclude her from future correspondences  
3 and discussions?

4 A. I don't recall.

5 Q. But you agree you don't think she was much help, right?

6 A. I don't think I would say that.

7 Q. Well, you did say that right below on March 13th at 4:36 p.m.

8 A. I don't know what I meant by that.

9 MR. DePERNO: Can we take a break?

10 (Recess taken from 2:06 p.m. until 2:08 p.m.)

11 MR. DePERNO: I have no further questions.

12 MR. HESSEN: I have no questions.

13 (Deposition concluded at 2:08 p.m.)

14 \* \* \*

CERTIFICATE

STATE OF MICHIGAN     )  
  )  
COUNTY OF KENT         )

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

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

IN WITNESS WHEREOF, I have hereunto set my hand this  
5th day of July of 2023 at Allegan, Michigan.

*Rebecca Renzema*

REBECCA S. RENZEMA, CSR-1435

Notary Public for Allegan County.

My Commission Expires: 12-31-2028

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