

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

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 KEN BEYER

DATE: July 17, 2023
TIME: 10:10 a.m.
LOCATION: Allegan District Library
331 Hubbard Street
Allegan, Michigan
REPORTER: Rebecca S. Renzema, CSR-1435

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6 KIMBERLY HARRIS,

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8 v

HON. CURTIS J. BELL

9 REPUBLICAN PARTY OF KALAMAZOO

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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8 On behalf of Plaintiffs

9
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15 On behalf of Defendants

16
17 ALSO PRESENT: Charley Coss

18 Kimberly Harris

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Allegan, Michigan

July 17, 2023; 10:10 a.m.

KEN BEYER

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

EXAMINATION

BY MR. DePERNO:

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

A. Ken Beyer. B-e-y-e-r.

Q. What's your middle name?

A. Jon. J-o-n.

Q. Do you go by any other names?

A. Kendall.

(Exhibit 1 marked for identification.)

BY MR. DePERNO:

Q. Handing you what's titled Third Amended Notice of Deposition
of Ken Beyer. Have you seen this before?

A. I believe it was e-mailed to me.

Q. Have you ever had your deposition taken?

A. Nope.

Q. Okay. I'll explain sort of the basic ground rules. I'll ask
you questions and if you could please wait until I'm done
asking the question before you answer and then answer in a way
that the court reporter can pick up what you're saying. And

1 don't use words like um or nodding or stuff like that. We've
2 got to vocalize so that the court reporter can take down
3 exactly what's being said.

4 A. Uh-huh.

5 Q. Make sense?

6 A. Yes.

7 Q. If you need to take a break at any time, just let us know and
8 we'll take a break. Do you have any conditions that would
9 affect your memory?

10 A. Not that I'm aware of.

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

13 A. No.

14 Q. Are you taking any medications that would affect your
15 memory?

16 A. No.

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

19 A. No.

20 Q. Do you have other reasons to believe or are there any other
21 things that you believe are affecting your memory today or
22 your ability to answer completely and truthfully today?

23 A. Being 57, possibly.

24 Q. What's your date and place of birth?

25 A. 11-24-65, South Haven, Michigan.

1 Q. And your home address, please?

2 A. 3238 Wildwood -- you're not going to post this on the

3 Internet, right?

4 Q. I don't intend to.

5 A. Okay. 3238 Wildwood Drive, Hamilton, Michigan, 49419.

6 Q. How long have you lived at that address?

7 A. Ten years. Possibly longer.

8 Q. Where did you live before you lived in Hamilton, Michigan?

9 A. Overisel.

10 Q. I'm sorry?

11 A. Overisel.

12 Q. Can you repeat that again?

13 A. Overisel.

14 Q. Overisel. What's that?

15 A. That's a town.

16 Q. Where is it?

17 A. Just north of Hamilton.

18 Q. Okay. Never heard of it. Have you ever lived out of the

19 state of Michigan?

20 A. Yes.

21 Q. Where have you lived?

22 A. Arizona. How's this relevant to the case?

23 Q. I'm just getting background information.

24 A. Okay.

25 Q. Yeah. Where did you live in Arizona?

1 A. Mesa.

2 Q. Have you ever been convicted of fraud or any other crime,
3 misdemeanor or felony?

4 A. No.

5 Q. Have you ever been investigated for fraud or any other crime,
6 misdemeanor or felony?

7 A. No.

8 Q. Do you have any arrest warrants out in your name?

9 A. No.

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

11 A. No.

12 Q. What's your current business?

13 A. Plumbing.

14 Q. What's the name of it?

15 A. Clog Squad.

16 Q. Clog Squad? How long have you owned that business?

17 A. Since 2006.

18 Q. Do you have a high school diploma?

19 A. Yes.

20 Q. Do you have any college degrees?

21 A. One year. No degree.

22 Q. Where did you go to college?

23 A. Grand Valley.

24 Q. What did you study?

25 A. Psychology.

1 Q. Other than a driver's license, do you own any other
2 licenses?
3 A. Master plumbing license.
4 Q. Is that it?
5 A. I'm not single if this is, like, a dating app.
6 Q. Do you have a CPL?
7 A. No.
8 Q. Now, you understand you're here today as part of a lawsuit,
9 correct?
10 A. Yep.
11 Q. Did you bring any documents with you today?
12 A. No.
13 Q. You are the chairman of District 4 in the state of Michigan
14 for the Republican party, is that correct?
15 A. Yes, sir.
16 Q. And that election took place February 17th, 2023, is that
17 correct?
18 A. That's correct.
19 Q. Are you familiar with the current lawsuit which is titled
20 Sabrina Pritchett-Evans and Kim Harris versus the Kalamazoo
21 County Republican Party and --
22 A. Roughly I don't --
23 Q. -- the Executive Committee?
24 A. I don't know much about it.
25 Q. You're roughly familiar with it?

1 A. Yeah.

2 Q. When you say you're roughly familiar, can you try to describe
3 your level of understanding of this case?

4 A. Not to the point where I would be able to make any sense of
5 it. I mean it's, like, they're suing I believe the party for
6 kicking people out and not holding a --

7 Q. Can you speak up?

8 A. -- not holding a legal county convention.

9 Q. Okay. So you think the case is about kicking people out?

10 A. Delegates, yeah.

11 Q. Kicking delegates out of what?

12 A. Out of their positions, out of the party I guess you'd call
13 it, whatever it is. Out of the Kalamazoo party.

14 Q. And you said not holding a valid county convention?

15 A. Yeah.

16 Q. Why do you think that? Why do you think this case is about
17 not holding a valid county convention?

18 A. Am I wrong? If I'm wrong, then I don't know.

19 Q. I'm asking you.

20 A. I really haven't read the lawsuit, so I'm not familiar with
21 it. Would you like to read it to me?

22 Q. No, but I want to get your understanding because you seem to
23 have some --

24 MR. THOMAS: It's asked and answered. I'm going to
25 object at this point. He already said he doesn't know. So

1 you should just move on.

2 BY MR. DePERNO:

3 Q. Okay. Have you donated money for this lawsuit?

4 A. Yes.

5 Q. Why did you donate money if you don't know what the case is

6 about?

7 A. Because they're good people fighting bad people.

8 Q. Who are the good people?

9 A. I would say Sabrina and Kim Harris.

10 Q. Who are the bad people?

11 A. I think that would be you, Charley, Kelly Sackett, some people

12 on the EC, Executive Committee.

13 Q. So the bad people are me, Charley. Are you referring to

14 Charley Coss?

15 A. Yeah, sitting right there.

16 Q. Kelly Sackett?

17 A. Yep.

18 Q. And people on the Executive Committee?

19 A. Certain people, yeah.

20 Q. Who?

21 A. I guess who would approve a vote, you know, getting rid of a

22 delegate without due process.

23 Q. Does that offend you when you say getting rid of a delegate?

24 A. I don't get offended by this. Why would I get offended?

25 Q. Well, I don't know. You said these are bad people, so --

1 A. I'm just saying that when you take away somebody's right as a
2 delegate, you know, that's not -- that's more acting like more
3 of a tyrant, I guess, would be the best way to put it.

4 Q. Are you opposed to tyranny?

5 A. Who isn't?

6 MR. DePERNO: Well, we can explore that today.

7 (Exhibit 2 marked for identification.)

8 BY MR. DePERNO:

9 Q. Showing you Exhibit 2. This is you -- a receipt for you
10 donating \$500, correct?

11 A. Yeah.

12 Q. And you say, "This is my John Hancock, my signing of
13 Kalamazoo's Declaration of Independence from tyranny.
14 Delegates in Kalamazoo County have had their rights suppressed
15 for way too long. We are restoring the power back to the
16 people." So what is the tyranny that you're fighting
17 against?

18 A. I think it's probably named in the lawsuit. But I would say
19 when you and Kelly went down to the clerk to ask the clerk if
20 you could unseat duly elected delegates, I think that would be
21 a good sign of tyranny. Because the only way you can get rid
22 of a delegate is if they were, you know, a felon, died, or
23 moved. And I believe you did that on the 16th of February.

24 Q. So let's see. You believe the only way to remove a delegate
25 is if they're a felon. What else? Died?

1 A. Moved or died, yep.

2 Q. And it's your understanding that Kelly Sackett and myself went
3 to the county clerk to ask how we can remove a delegate?

4 A. No. I think you had an idea on how to do it. I wasn't there,
5 so I can't speak for that. But my understanding from talking
6 to the clerk when we went there is that, you know, she didn't
7 think it was the best idea and I don't think the lawyer that
8 responded to that attempt thought it was a good idea either.

9 Q. So you talked to -- is it Meredith Place?

10 A. Yep.

11 Q. When did you talk to Meredith Place?

12 A. I don't know. In the spring.

13 Q. Did you contact her or did she contact you?

14 A. We went down as a group.

15 Q. Who is "we"?

16 A. Me and I believe it was, like, 12 other delegates that got a
17 letter from Kelly Sackett by the power invested by her to
18 remove them.

19 Q. Now, you didn't get a letter, did you?

20 A. No.

21 Q. Okay. So why were you with these other 12 people at the
22 county clerk's office? Why were you part of the group?

23 A. Because I support their -- somebody's got to be there to
24 support them.

25 Q. So you support them. And what do you support in this

1 situation? When you say you went there to support them, what
2 support were you providing?

3 A. I was providing just the moral support.

4 Q. And did you talk directly with Meredith Place?

5 A. Yep.

6 Q. Who else was in the meeting? Can you name -- first let's see
7 if you can name the 12 people that were there.

8 A. I can't name hardly any of them.

9 Q. Was Sabrina Pritchett-Evans there?

10 A. Yep.

11 Q. Was Kim Harris there?

12 A. Yep.

13 Q. Veronica Pero?

14 A. I don't remember.

15 Q. You don't know any of the other names of the 12 people?

16 A. I didn't -- I didn't put that into my memory bank, no. I
17 didn't write it down, so I don't want to say something that
18 I'm going to be held --

19 Q. Right. So under oath here today you're saying you went to
20 the clerk's office with 12 delegates to support them in the
21 spring and it's now in July and you're saying you don't
22 remember who they were?

23 MR. THOMAS: Object. It's been asked and answered.
24 If he doesn't remember, he doesn't remember, and that was your
25 answer.

1 THE WITNESS: Yep.

2 BY MR. DePERNO:

3 Q. What did Meredith Place tell you?

4 A. She didn't say you were a liar, but she said you were being
5 dishonest with your interpretation back to the Executive
6 Committee or in an e-mail. She said you did not have the
7 power to do that.

8 Q. Did not have the power to do what?

9 A. To remove delegates.

10 Q. Who asked her that question specifically?

11 A. I think we all did at one point. I mean somebody did.

12 Q. So you're all talking at once?

13 A. No, but we did get our point across. So eventually everybody
14 did say something.

15 Q. Okay. So there were 12 of you in a room talking to the clerk,
16 expressing your opinion, and you're claiming that she
17 agreed?

18 A. My opinion based on law, yeah.

19 Q. Okay. Let's get into that, your opinion based on law. What
20 is your understanding of the law?

21 A. I just told you that. Being able to remove a delegate, they
22 either have to die, move --

23 MR. THOMAS: I'm going to object. You're asking for
24 a legal conclusion and he's not a lawyer, so move on. It's
25 not a good question, Matt.

1 MR. DePERNO: Of course it is because he said it.

2 MR. THOMAS: It's not a good question. It's an
3 opinion and he's not a lawyer. You're asking for a legal
4 conclusion, so I'm objecting and you need to move on. It's
5 not a good question.

6 MR. DePERNO: You can object all you want. I'm
7 going to explore the answer because he made the statement --

8 MR. THOMAS: It's a legal conclusion. He doesn't
9 have to provide you a legal conclusion.

10 MR. DePERNO: Well, he made the statement that he
11 was giving her his opinion based on law and I'm able to ask
12 for his opinion that he said he gave to her.

13 MR. THOMAS: Okay. Well, I mean if he doesn't know
14 what that legal conclusion is, you know, the interpretation of
15 what the law is, then that's -- you're going to end up with
16 the answer that you don't want.

17 MR. DePERNO: Well, he said it so I can ask it.
18 Your attempt to interfere in --

19 MR. THOMAS: I'm not attempting to interfere. I
20 objected on the basis that it's a legal conclusion.

21 BY MR. DePERNO:

22 Q. So when you say your opinion based on law, are you saying a
23 delegate can only be removed if they're a felon, they died, or
24 they moved?

25 A. Yes.

1 Q. Do you think there's any established law that allows a
2 delegate to be removed simply for going against the party?

3 MR. THOMAS: Object, it's speculation. It's
4 speculation.

5 THE WITNESS: I don't know how to answer that one.

6 BY MR. DePERNO:

7 Q. Okay. What if a -- what if a delegate running in an election
8 is running against another candidate endorsed by the party?
9 Could that delegate be removed from the party?

10 MR. THOMAS: Object to speculation and also object
11 to a legal conclusion. It's not relevant. It's not none of
12 that.

13 MR. DePERNO: It is. Well, it's very relevant and
14 it's relevant to get his understanding of what he's talking
15 about.

16 BY MR. DePERNO:

17 Q. So you are the District 4 chairman, right?

18 A. You said yourself I'm not -- I don't know what I'm doing, so I
19 may not have to go with that. I don't -- I don't have any
20 idea of what you're asking.

21 Q. So you don't know what you're doing. Is that your
22 testimony?

23 A. That's your testimony.

24 Q. I'm asking you for your testimony.

25 A. No, I know what I'm doing, but not when it comes to legal

1 questions like that. That's why I have a lawyer with me.

2 Q. But not your lawyer, right? Jimmy is not your lawyer,
3 correct?

4 A. He's representing me right now, right?

5 Q. Are you claiming that Jimmy Thomas is your lawyer?

6 MR. DePERNO: Are you making an appearance here on
7 behalf of Ken Beyer?

8 MR. THOMAS: No, I'm not making an appearance. I'm
9 not his lawyer and you know I'm not his lawyer. I'm sitting
10 in --

11 MR. DePERNO: Well, he seems to be --

12 MR. THOMAS: -- for Greg Todd.

13 MR. DePERNO: He seems to be saying that you're his
14 lawyer.

15 MR. THOMAS: I'm sitting in for Greg Todd.

16 MR. DePERNO: You can't sit in for another lawyer.
17 You're either his attorney today or you're not.

18 MR. THOMAS: I'm sitting here as the attorney for
19 the plaintiffs overseeing your deposition to make sure that
20 you don't go into questions that aren't supposed to be
21 asked.

22 BY MR. DePERNO:

23 Q. Okay. So we're clear. Jimmy Thomas is not your lawyer,
24 correct?

25 A. Correct.

1 Q. Because you seem confused about that issue.

2 A. Greg Todd is.

3 Q. Greg Todd is, but Jimmy is not your lawyer?

4 A. Once again, you're asking me about a legal proceeding and I
5 have no idea what's going on with that part.

6 Q. So you have no idea who your lawyer is?

7 A. No. I don't know what is being said right now.

8 Q. You don't know --

9 MR. THOMAS: Time out.

10 MR. DePERNO: No, we're not --

11 MR. THOMAS: Off the record.

12 MR. DePERNO: We are not off the record.

13 MR. THOMAS: You are trying to put words in his
14 mouth and you need to knock it off.

15 BY MR. DePERNO:

16 Q. We are not off the record. We are on the record and the
17 record is I was asking a simple question of who your lawyer is
18 today.

19 MR. THOMAS: He just answered. It's asked and
20 answered. He said Greg Todd. I'm not his lawyer and you know
21 that.

22 MR. DePERNO: Jimmy, you don't have to yell. You
23 need to calm down.

24 MR. THOMAS: No, I'm not going to calm down. You're
25 out of line, Matt.

1 MR. DePERNO: You need to calm down.

2 MR. THOMAS: You're out of line.

3 MR. DePERNO: You're being unprofessional right
4 now.

5 MR. THOMAS: Yeah, you're being unprofessional.

6 MR. DePERNO: I'm simply asking a question, trying
7 to get an understanding from the witness as to --

8 MR. THOMAS: It's been asked and answered. He told
9 you who his lawyer is.

10 MR. DePERNO: No. He said he doesn't seem to
11 understand and I can explore that issue because we have a
12 witness here who seems to think you're his lawyer.

13 MR. THOMAS: He did not say that I'm his lawyer.

14 BY MR. DePERNO:

15 Q. Do you recognize today that Jimmy Thomas is not your lawyer?

16 A. I recognize that he's not my lawyer.

17 Q. Okay. When did you get involved with the Michigan Republican
18 party?

19 A. Probably when I was 18.

20 Q. What did you do when you were 18?

21 A. Registered to vote. Registered as a Republican.

22 Q. And yet you've given donations to Democrats, right?

23 A. Yes.

24 Q. Why?

25 A. I read "The Art of the Deal" by President Trump where if

1 you're going to start a business in an area, you know, you
2 make friends with the politicians that are in that area and,
3 unfortunately, Kalamazoo is a Democrat-ran area. So we were
4 going to expand our plumbing business to Kalamazoo and, you
5 know, I gave money. I gave a lot of money to you. How do you
6 explain that?

7 Q. So you gave money to a Democrat because you were starting a
8 business in the area?

9 A. Yeah.

10 Q. What did you think that donation was going to buy you?

11 A. I didn't think it was going to buy me anything.

12 Q. Then why did you give the donation?

13 A. Because when you give somebody money like yourself, you know,
14 usually, you know, you're supporting, you know -- you're
15 letting people know in that area because -- you're doing
16 business with the City. So if you read "The Art of the Deal"
17 -- have you ever read it?

18 Q. Well, we're here --

19 A. I'm just saying --

20 Q. -- to ask you questions.

21 (Overlapping discussion.)

22 A. Yeah, I gave money to a Democrat. That doesn't make me a
23 Democrat. President Trump gives money to Democrats, so --

24 Q. So what favors were you thinking you were going to obtain by
25 giving money to a Democrat?

1 A. I gave you money without expecting a favor.
2 Q. That's not --
3 A. So that's what I'm saying.
4 Q. That's not the answer --
5 A. You give money to people because -- in the business, like when
6 you're -- it lets people know who you are and get us on a list
7 for the City I was hoping, but I wasn't looking to pay anybody
8 to do that.
9 Q. Well, you said it got you on the list for the City. You're
10 saying that giving a donation to a Democrat got you on a
11 list --
12 A. No, I did not --
13 Q. You've got to wait until I'm finished. What you just said --
14 and I want to clarify -- is you gave money to a Democrat so
15 that you could get on a list with the City. Is that because
16 you hoped to then get business from the City?
17 A. I was -- of course, yes.
18 Q. What makes Charley Coss a bad person?
19 A. You'd have to ask Charley.
20 Q. No, you said it. You said he's a bad person. So I'm asking
21 you --
22 A. I think anybody that supports the removal of delegates from
23 their duly elected position aren't good people.
24 Q. Have delegates ever been removed across the state of Michigan
25 within the Republican party?

1 A. I have no idea.

2 Q. You don't? And yet, again, you're the District 4 chair?

3 A. Am I supposed to know that?

4 Q. Yes. Why is Kelly Sackett a bad person?

5 A. She removed 17 delegates by the power invested in her. And

6 she also got drunk and got into a bar fight at the first state

7 committee meeting.

8 Q. And you filmed that, right?

9 A. Absolutely.

10 Q. Why were you filming that?

11 A. Because I saw her. I was sitting out there and John Smith

12 asked me to come out and I'm sitting in the area with these

13 people. And Kelly Sackett said, "I won my election." She was

14 arguing with somebody. She said, "I won my election by so

15 many votes, so many votes. Those losers can fuck off." So I

16 thought, "Huh, maybe I should be recording this because people

17 in Kalamazoo should see who's representing them at the state

18 meeting." So I got my phone out to record that and it

19 escalated into a fight, so --

20 Q. But you were recording before that.

21 A. I recorded when I heard her say that.

22 Q. But you were recording --

23 A. No.

24 Q. -- earlier than that.

25 A. No. No. I recorded when she said that the losers could fuck

1 off. That's when I started recording because I'm, like, "Huh,
2 this isn't how a good person would act."
3 Q. And then you posted that on social media, correct?
4 A. No.
5 Q. Who posted it?
6 A. I have no idea.
7 Q. You don't know?
8 A. I sent it to a few people, but I never posted it anywhere.
9 Q. Mr. Beyer, you're under oath.
10 A. Yeah.
11 Q. You know what perjury is?
12 A. I do.
13 Q. What is perjury?
14 A. Perjury is not telling the truth.
15 Q. And there's penalties for perjury, correct?
16 A. Show me where I did that. I did not post it anywhere.
17 Q. Okay. I asked you the question. Do you know who did post
18 it?
19 A. No, I do not.
20 Q. Did you ask anyone to take that video down after they posted
21 it?
22 A. Yes.
23 Q. Then you do know who posted it.
24 A. I asked -- I said, "Whoever posted it, take it down," but then
25 it got taken down.

1 Q. We'll come back to that. So earlier you said that you also
2 thought this case was about not holding a valid county
3 convention, correct? What did you mean by that?

4 A. How did you get appointed to the EC? Because you didn't get
5 voted in. So maybe I'm confused on how the convention is ran
6 because I wasn't there, but I know that you're holding a
7 position within the EC that didn't go through the proper --

8 Q. So let's break that down. First, because you say you don't
9 know, the vote to replace three people from the EC who
10 resigned was not at the county convention.

11 A. Okay.

12 Q. Okay? So let's separate the two. Do you have any reason --
13 other than that, do you have any reason to believe that the
14 KGOP did not hold a valid county convention?

15 A. Like I said, that was an answer to your question what I
16 thought the lawsuit was, which I haven't read.

17 Q. Okay.

18 A. So, yeah, that was just my conclusion, but it must be wrong,
19 so --

20 Q. Okay. So if we can agree that that's wrong, your conclusion
21 is wrong, because the vote to replace three members in the EC
22 was not done at a county convention, it was done at an
23 Executive Committee meeting, not a convention.

24 A. Uh-huh.

25 Q. Can we agree on that at least?

1 A. Yeah, sure.

2 Q. Okay. Do you understand that there were three statutory
3 members on the Executive Committee who resigned?

4 A. At what point?

5 Q. After the November election?

6 A. After the November election, before the February election?

7 Q. Correct.

8 A. Yeah, I would have no idea what was going on in Kalamazoo.

9 Q. Do you know what a statutory member on an Executive Committee
10 is?

11 A. Why don't you enlighten me?

12 Q. I'm asking you if you know.

13 A. That's somebody that ran for election at one point, was
14 appointed to that because they ran, but I don't think attorney
15 general counts.

16 Q. It's a person who ran for an election and won their primary in
17 the last two election cycles.

18 A. Okay.

19 Q. Those people have a seat on the Executive Committee as
20 statutory members.

21 A. Okay.

22 Q. Makes sense?

23 A. Uh-huh.

24 Q. In Kalamazoo we have --

25 MR. THOMAS: I'm going to object. You've got to ask

1 him questions. You're filling him with filler here. Ask a
2 question. This is a deposition.

3 BY MR. DePERNO:

4 Q. In Kalamazoo we have 18 statutory members. After the November
5 election there were three of those Executive Committee
6 statutory members who resigned, okay?

7 A. Uh-huh.

8 Q. Does that make sense?

9 A. Yep.

10 Q. There's also 18 elected members on the Executive Committee.
11 Do you know what an elected member is?

12 A. Absolutely.

13 Q. You do?

14 A. Yeah.

15 Q. What's an elected member?

16 A. Where you had an election to elect them, the body elected
17 them.

18 Q. So you have 18 statutory and 18 elected members?

19 A. Uh-huh.

20 Q. When three of those statutory members resigned, the Executive
21 Committee held a meeting at which time there were nominations
22 to replace those three statutory members. There were
23 nominations and an election by the Executive Committee. Does
24 that make sense?

25 A. Yep.

1 Q. Does that change your thought as to what you think happened?

2 A. Not really.

3 Q. Not really.

4 A. I mean -- I don't know what I need to think right now. I
5 don't know what you're asking. I don't know if this is a
6 question or --

7 Q. Well, you said --

8 A. And I don't understand what your point is.

9 Q. Well, you said that you thought this lawsuit was about the
10 KGOP not holding a valid county convention. You said at which
11 time they replaced three members on the Executive Committee.

12 A. Uh-huh.

13 Q. So I'm explaining to you what happened.

14 MR. THOMAS: And I'm going to object again. You're
15 going to either ask a question or move on. He's already
16 answered it. He's already answered it. It's been asked and
17 answered. You've asked this five times already. Let's move
18 on.

19 BY MR. DePERNO:

20 Q. So I'm trying to get your understanding now as to whether
21 what I'm explaining to you is different than what your
22 understanding was when you walked in this room today.

23 A. On what specifically?

24 Q. On the replacement of these three statutory members.

25 A. So how would they be replaced?

1 Q. Well, they were replaced through a nomination and a vote by
2 the Executive Committee, okay?
3 A. How many people were part of that vote?
4 Q. The Executive Committee.
5 A. The entire Executive Committee?
6 Q. The Executive Committee.
7 A. Was there a quorum? I mean how many people do you need to
8 have a quorum?
9 Q. There's minutes prepared which detail all of that. I'm
10 asking --
11 A. Do you have those minutes and can I read them because --
12 Q. I don't have the minutes with me today. I'm asking you if
13 anything has changed based on your understanding of when you
14 walked in today. Because you said that you didn't think that
15 those people could be replaced.
16 A. They can't be appointed.
17 Q. Okay.
18 A. Did you get voted in?
19 Q. Yes. So they weren't --
20 A. Was there a quorum? How many people voted you in?
21 Q. They weren't --
22 A. How many people voted you in?
23 Q. They weren't appointed. They were elected by the Executive
24 Committee. Does that change your mind at all?
25 A. I'm just asking. Was there a quorum and how many people voted

1 you in at the time?

2 Q. Yes to all of that. The question is --

3 A. That wasn't a yes question. I'm trying to understand. You're
4 trying to get me to understand something, so I'm asking
5 questions to understand it.

6 Q. Okay. In other words, you don't know what happened. You came
7 into this deposition today making assumptions about what
8 happened and it seems obvious now that what you're saying is
9 you don't know?

10 MR. THOMAS: I'm going to object. This is a
11 discovery deposition. You're supposed to ask him questions to
12 see what he knows. You're trying to give him your information
13 so he'll understand. That's not what we're here for. You
14 asked him -- if he doesn't know, he doesn't know the answer,
15 Matt. You know better than that.

16 MR. DePERNO: Is that your objection as to the
17 plaintiffs or for your client, Ken Beyer?

18 MR. THOMAS: It's for my plaintiffs because we're
19 sitting here, it's our time that we're sitting here listening
20 to you trying to educate him on how things work. That's not
21 what we're here for.

22 MR. DePERNO: I'm just trying to understand what he
23 actually knows.

24 MR. THOMAS: I don't care if you understand or
25 not.

1 MR. DePERNO: He's the 4th District chair.

2 MR. THOMAS: So what?

3 (Exhibit 3 marked for identification.)

4 BY MR. DePERNO:

5 Q. Handing you Exhibit 3. It's a series of text messages. You
6 may recognize these. Do you recognize these?

7 A. Not right off the bat. Who is it between?

8 Q. These are messages between yourself and Sabrina
9 Pritchett-Evans.

10 A. Okay.

11 Q. Do you recognize them?

12 A. Back in February? I don't recognize them, but it looks like
13 text messages.

14 Q. So on the first page at the bottom it says page number 6.
15 These are -- on February 10th you say, "We are the new
16 Republicans and we make changes and those will include her."
17 You're talking about Kelly Sackett, right?

18 A. Yeah.

19 Q. What do you mean, "We make changes and those will include
20 her"?

21 A. We're not here to uphold the status quo of the Republican
22 party. We're here to be the change makers of the Republican
23 party. That's what that is.

24 Q. What is the status quo?

25 A. A status quo would be losing the 2021 election, the 2022

1 election, keeping, you know, the old Republicans, you know,
2 around that are just here to be in it for power. I'm not here
3 because I want to be in power. I'm here because I want to
4 make changes that are going to help with -- save my
5 grandkids', you know, country. That's why I'm here.

6 Q. And you believe that Kelly Sackett is one of those old
7 Republicans?

8 A. I believe Kelly Sackett is controlled by you and a group of
9 people and I believe that. And I hope she's just, like, naive
10 to what she's doing, but I believe that, you know, she is not
11 working for the betterment of our country. I think she's
12 trying to keep control for her own means.

13 Q. What means?

14 A. I don't know. You'd have to ask her.

15 Q. How would I control her?

16 A. She'd be looking for somebody's expertise, right? I mean,
17 you think she's acting alone in all this when you go into a
18 meeting with her? You know, you guys are side by side with
19 every decision that you're making with her, which I don't
20 understand.

21 Q. So how are we side by side with every decision?

22 A. Who's writing her letters, "by the power invested in me"?
23 Who's giving her the confidence to do stuff like that? Do you
24 think she's interpreting the law? I don't know. I might be
25 making assumptions, but I think you're helping her with those

1 decisions.

2 Q. So when you say "and those will include her," what do you
3 mean? Are you talking about removing Kelly Sackett?

4 A. Oh, I'd love to remove Kelly Sackett. If I could do -- if you
5 could support me in the decision to remove her, I would love
6 to do that.

7 Q. Why do you want to remove Kelly Sackett?

8 A. Because anybody that would write 17 people "by the power
9 invested in me you're no longer a delegate" has no reason to
10 be in power.

11 Q. A couple of minutes later on February 10th you say, "We are
12 here to make changes and establish a renewed government."
13 What is a "renewed government"?

14 A. I would say a renewed government is one that isn't following
15 the status quo that we talked about, something that would
16 allow the delegates to have the power, not a top-down
17 organization like you guys created at the GOP.

18 Q. That "you guys created at the GOP." What do you mean by that?

19 A. At the KGOP.

20 Q. So you think the KGOP is a top-down organization?

21 A. Based on everything that I've seen so far, yes. I don't think
22 you're empowering delegates when you write them 17 letters
23 telling them they're no longer delegates.

24 Q. And you want government to be delegate empowered?

25 A. I want government to be people empowered. We the people, a

1 concept you're not familiar with obviously.

2 Q. Well, why do you say that, "a concept you're not familiar
3 with"?

4 A. That's in your heart.

5 Q. Well, you said it. I'm asking, why do you say that?

6 A. Because of your actions, because of your attitudes, because of
7 your frivolous subpoenas, because of everything that you've
8 done, because of complaints that I've read about you. You
9 know, that's what I'm talking about. You think that you've
10 got an entitlement, that you are there for power. To me, it's
11 been an embarrassment, the fact that my wife has worked for
12 you, that I supported you during your whole, you know,
13 campaign to find out who you are at this moment.

14 Q. Well, it's not about me. You can make it about me, but this
15 is not about me.

16 A. From what I hear about Telegram it is about you.

17 (Clarification by Reporter.)

18 THE WITNESS: If you hear what I hear from him on
19 Telegram, he went from being the Attorney General to a
20 Telegram troll.

21 BY MR. DePERNO:

22 Q. What do you think the term America First means?

23 A. It's what it says it is. Make America first. You know, make
24 decisions based on American values, American principles,
25 America's -- you know, the same concept that our founding

1 fathers would have had. The fact that, you know, we're here
2 for God, country, and family. And if you get into the
3 manufacturing aspect of it, you know, manufacturing is
4 probably better off here in the United States.

5 Q. And what is the establishment in your view?

6 A. In my view it would be the people that want to uphold the
7 status quo --

8 (Clarification by Reporter.)

9 THE WITNESS: In my opinion it would be the people
10 that want to uphold the status quo of the Republican party and
11 not want to change it to be a party that is for the people, by
12 the people, and more constitutional than it is.

13 BY MR. DePERNO:

14 Q. For the District 4 chair you ran against a guy named Shawn,
15 correct?

16 A. Yeah.

17 Q. What was his full name?

18 A. I don't know his full name. I know he goes by the last name
19 of Calder(ph).

20 Q. Calder?

21 A. Yeah.

22 Q. Did you get along with Shawn Calder?

23 A. I did.

24 Q. Do you still?

25 A. No.

1 Q. Why not?

2 A. Because he threw me the bird, told me to fuck off and told me
3 I was a bad leader. And he didn't want to help me at all when
4 it came to the elections or passing on any information from
5 District 4. He handed the torch, let's say, like most
6 Republicans seem to do. And after burning down everything,
7 not having any records, not having any e-mails, not giving me
8 a bank account, nothing to go by, just an "F you" and "Kiss my
9 ass" is what I got from him.

10 So I didn't do that. He did it. It's like what you
11 guys are doing now. You're having a hissy fit because you
12 guys didn't gain power on the 17th and you think that we're
13 going to capitulate to your hissy fit. Not doing it.

14 Q. Okay. I'm totally lost and confused now. What does
15 February 17th have to do with anything?

16 A. Exactly. Thank you. We don't need to talk about
17 February 17th from this point on.

18 Q. Well, I'm asking you.

19 A. No. It's perfect. I agree with you.

20 Q. But you brought it up.

21 A. I agree with you. It doesn't have anything to do with
22 anything. It is what you guys have been, you know, grabbing
23 ahold of to rationalize and justify Kelly's actions of
24 removing 17 delegates.

25 Q. Okay. So --

1 A. But I'm happy with not talking about February 17th ever again.
2 So if you say it doesn't matter, I agree with you, it doesn't
3 matter.

4 Q. Well, I did not say it didn't matter. I was asking you about
5 your comment. Bottom of 17, page 17 at the bottom. Well,
6 midpoint. This is Sabrina Pritchett-Evans saying something to
7 you about her husband is laughing and is in tears. Is this a
8 conversation where you're making fun of Shawn Calder?

9 (Short pause.)

10 A. Where exactly would you get the idea that I'm making fun of
11 Shawn Calder?

12 Q. Well, she's talking about -- she says, "My husband has me in
13 tears laughing. He said that they look like you are going in
14 front of school board and they are about to tell you your kid
15 has to" --

16 A. Oh, yeah. That was their wonderful campaign ad that they made
17 where they cut and pasted their team or whatever it was, their
18 slate, that Shawn and everybody was running with. Yeah, it
19 was comical. That was comical.

20 Q. Okay.

21 A. So I don't think I was making fun of it, but it was funny.

22 Q. Okay. You've got to enlighten me because I don't know
23 anything about their campaign ad. So you're describing it as
24 a flyer they put out?

25 A. I don't know if it was a flyer. I don't have privy [sic] to

1 that, but I know it was an e-mail that I saw that went out to
2 everybody and I believe they text messaged it also.

3 Q. And then at the bottom you say, "I just showed Sally. She
4 laughed so hard she pulled a rib muscle. Now she is praying
5 for forgiveness." Who's Sally?

6 A. She's my wife.

7 Q. Why was she praying for forgiveness?

8 A. Because she was laughing at somebody that unfortunately -- a
9 horrible ad.

10 Q. So is that how it works? You laugh at them and then you
11 pray?

12 A. I would say she's a good person and she felt bad that she was
13 laughing at somebody's misfortunate of having a horrible ad
14 like that, yeah.

15 Q. Yeah, but that's how it works, right? You make fun of someone
16 and then you pray for forgiveness, correct?

17 A. You'd have to ask Sally.

18 Q. I'm asking you.

19 A. No, I --

20 Q. Is that how it works?

21 A. No, that's not how it works. Maybe with the Catholic religion
22 it is, but not with mine.

23 Q. What religion are you?

24 MR. THOMAS: Objection. It's not relevant.

25 MR. DePERNO: No, it is. He just --

1 MR. THOMAS: It's not.

2 MR. DePERNO: He brought it up.

3 MR. THOMAS: It's not.

4 MR. DePERNO: He raised the issue.

5 MR. THOMAS: It's not. It's none of his business
6 what your religion is. It's none of his business.

7 THE WITNESS: It's none of your business.

8 BY MR. DePERNO:

9 Q. Well, you just made a negative comment about the Catholics.

10 A. Because you were --

11 MR. THOMAS: Why, because you're a Catholic? Is
12 that what you're concerned about?

13 THE WITNESS: You were making a negative, you know,
14 about my belief system.

15 BY MR. DePERNO:

16 Q. No. I'm asking the question and you made a disparaging
17 comment, so I'm trying to explore that. What do you think the
18 Catholics believe?

19 A. I wouldn't know. I'm not Catholic.

20 Q. Okay. The next page, page 18, Sabrina says, "I'm still
21 laughing. I'll pray in a few minutes." So that is how it
22 works, correct? You laugh and then pray?

23 MR. THOMAS: Object. Asked and answered. Let's
24 move on, please.

25

1 BY MR. DePERNO:
2 Q. Correct?
3 A. I love you. You're so funny.
4 MR. THOMAS: Asked and answered.
5 BY MR. DePERNO:
6 Q. Correct?
7 A. I don't know. You'd have to ask Sabrina.
8 Q. Okay.
9 A. You haven't seen this ad?
10 Q. I've not --
11 A. Oh, it's horrible. I'll send it to you because it was
12 terrible.
13 Q. I have no idea.
14 A. You'd be laughing, too.
15 Q. On page 26 there was an issue with Allegan County selecting
16 its nominees prior to February 17th, correct?
17 A. Allegan County, they voted on who they wanted to nominate
18 before the 17th, yes.
19 Q. Was that okay?
20 A. I don't know. Shawn was running it. You would have to ask
21 him.
22 Q. Shawn Calder ran the Allegan County --
23 A. No. He was part of the District 4 at that time. He was the
24 appointed person at that time. So I don't -- you know, you'd
25 have to ask Allegan County how they did it. It seemed like

1 every county was doing it a little bit different.

2 Q. But you didn't have a problem with Allegan County selecting
3 their delegate nominees --

4 A. The delegates made the decision --

5 Q. Hold on. You've got to --

6 A. Yeah.

7 Q. Wait until I'm done asking the question. We just can't be
8 talking over each other. So were you okay with the Allegan
9 County delegates selecting their nominees for district and
10 state committee prior to February 17th?

11 A. The delegates chose who they wanted to nominate, yes. I
12 didn't see anything wrong with that. What I see wrong is when
13 a chairperson or anybody at the -- somebody makes that
14 decision, you know, based on the rules that Charley wrote.

15 Q. I'm confused now what that answer means.

16 A. Well, this seemed to me that the delegates choosing seems more
17 of the way that it should be because if they're choosing who
18 their nominations are, which isn't that how the county is
19 supposed to choose them? Or is it appointed by the
20 chairperson?

21 Q. Well, I believe the county delegates would select their
22 nominees.

23 A. Yeah. And that's what they did.

24 Q. I would think every person in this room would probably agree
25 that the county delegates should select the nominee.

1 A. Then how come Charley wrote a rule, I guess, for Rule 9 or
2 something like that that made it possible for the chair to go,
3 "Well, we don't accept those delegates."

4 MR. DePERNO: Oh, here. I've got two copies.
5 (Exhibit 4 marked for identification.)

6 BY MR. DePERNO:

7 Q. Handing you Exhibit 4. This is the agenda and the rules for
8 the -- oh, no, this is the wrong thing.

9 (Long pause.)

10 Exhibit 4 is the 4th District Agenda and Rules for
11 the February 17th, 2023 caucus. Do you agree?

12 A. Yeah.

13 Q. And you're familiar with these rules, correct?

14 A. No.

15 Q. You're not familiar with the rules?

16 A. I wasn't District 4 chair at that point, so no, I was not -- I
17 was as familiar as anyone else at that meeting was with the
18 rules.

19 Q. Do you understand that the county chairs prior to the
20 February 17th caucus agreed to these rules for the
21 February 17th caucus?

22 MR. THOMAS: Is that a question?

23 MR. DePERNO: Yes.

24 MR. THOMAS: Okay. Put it in a question.

25 MR. DePERNO: I did.

1 MR. THOMAS: That was a statement.

2 MR. DePERNO: I did. I said, "Do you understand."

3 Pay attention, Jimmy. Keep up.

4 BY MR. DePERNO:

5 Q. On the third page of paragraph 9 is Rule 9. Do you see
6 that?

7 A. Uh-huh.

8 Q. What is it about Rule 9 that you -- where you believe a county
9 chair can select the nominees?

10 A. Which -- which selection -- which sentence here did the
11 parliamentarian strike as being illegal?

12 Q. I don't know.

13 A. You should know.

14 Q. I don't know.

15 A. You were there. This has been your whole argument. You don't
16 know? Then how am I supposed to know? If you don't know what
17 sentence was striked in there, how am I supposed to know?

18 Q. The question I asked you was what about Rule 9 --

19 MR. THOMAS: I think it's that one.

20 BY MR. DePERNO:

21 Q. What about Rule 9 --

22 A. "County chairs will announce their nominees to the District
23 delegation at large. The District delegation shall accept as
24 final, each counties nominees."

25 Q. Okay.

1 A. So wasn't that the one that was removed? It was stricken by
2 the parliamentarian --

3 Q. I don't know --

4 A. -- Thomas Balch.

5 Q. I don't know what was stricken. I'm asking you which part of
6 the rule you believed would allow a county chair to select
7 nominees?

8 A. I'm saying the one that they eliminated. So if you don't know
9 which one it is, I can't say that I do either, but I'm saying
10 the second sentence is the one I believe that it is, but --
11 but you seriously don't know which one was stricken?

12 MR. DePERNO: Well, let's go off the record. I'll
13 have to ask Charley.

14 (Recess taken from 11:05 a.m. until 11:07.)

15 BY MR. DePERNO:

16 Q. So we're back on the record. I conferred with Charley Coss
17 and he's advised that the second sentence of the second
18 paragraph is what was stricken by the parliamentarian at the
19 February 17 caucus. And that language says, "The District
20 delegation shall accept as final, each counties nominees."
21 So the first sentence of the second paragraph remained. Do
22 you believe that first sentence allows a county chair to
23 disregard the vote within a caucus and select his or her
24 personal nominees?

25 A. You'd have to ask the parliamentarian why he struck that, why

1 he said it was illegal for that sentence to be in there
2 because he said that. He also held up the book and he said,
3 "My name is at the bottom of the book." So that argument is
4 not my argument, nor my interpretation. I just voted as I
5 should.

6 Q. No. I'm asking you about -- we're not talking about the
7 second sentence. That was stricken. I'm talking simply about
8 the first sentence. Do you believe the first sentence of
9 paragraph 2 in Rule 9 allows a county chair to disregard the
10 delegate's vote in a caucus and announce his or her own
11 personal nominee?

12 A. So what's the question?

13 Q. Is that how you interpret that first --

14 A. No. Say it again. Which sentence am I looking at?

15 Q. The first sentence of paragraph 2 --

16 A. Point it out here, please.

17 Q. It starts with --

18 A. Yeah.

19 Q. The sentence says, "County chairs will announce their nominees
20 to the District delegation at large." How do you interpret
21 that sentence?

22 A. This is the one that was struck.

23 Q. No.

24 A. This was not the one that was struck?

25 Q. No.

1 A. Which one was struck?

2 Q. The second sentence of paragraph 2 was struck. It reads,
3 "The District delegation shall accept as final, each counties
4 nominees." That was stricken.

5 MR. THOMAS: Are you stating that as a fact? I
6 mean, do we know for sure?

7 MR. DePERNO: That's what Charley Coss has told
8 me.

9 MR. THOMAS: Well, he's not here to testify.

10 THE WITNESS: Has he been sworn in? If you want to
11 swear him in, then I'll take his -- I'm saying whatever
12 sentence they struck out of this whole thing, no conversation
13 after that.

14 MR. DePERNO: Agreed.

15 MR. THOMAS: You're asking for a legal opinion of --

16 BY MR. DePERNO:

17 Q. So I want your --

18 MR. THOMAS: Objection. You're trying to give a
19 legal opinion of something written in a rule by somebody who
20 can't interpret. You're asking for a legal conclusion.

21 BY MR. DePERNO:

22 Q. Okay. I'll take an answer to the question of what do you
23 think the first sentence of paragraph 2 means?

24 A. I don't have an opinion on it.

25 Q. Okay. So we just went through this whole exercise about

1 Rule 9 based on a statement you made previously about
2 Kalamazoo County Chair Kelly Sackett wanting to install
3 someone at the district caucus.

4 MR. THOMAS: Is that a question? I'm not following
5 the question.

6 BY MR. DePERNO:

7 Q. I don't understand.

8 A. I don't understand the question.

9 MR. THOMAS: Can you repeat the question? Because I
10 don't even know what the question was.

11 BY MR. DePERNO:

12 Q. Let's go back to page 26 then. We were having a discussion
13 about whether or not the delegates within a county should be
14 able to pick or elect their nominees for district and state
15 committee.

16 A. Yeah. That's how it should be.

17 Q. Okay. And you think Allegan County did that just fine?

18 A. I believe so.

19 Q. Do you think -- and then we had a discussion about Rule 9.
20 You brought up Rule 9 as to how the delegate election was
21 handled in -- or the nominee election was handled in Kalamazoo
22 County. Did you have an issue with what was happening in
23 Kalamazoo County?

24 A. Why would I personally have an issue with anything that they
25 did in Kalamazoo County until we got to the district and then

1 it was all handled by the body of the delegation at that
2 point, which I was just part of the body. I had no leadership
3 position.

4 Q. You voted to set aside Rule 9 as to Kalamazoo County,
5 correct?

6 A. Absolutely.

7 Q. Why?

8 A. Because it was -- that sentence in there that was struck
9 didn't set well with a lot of people. So the fact that the
10 state parliamentarian came in and removed that sentence, why
11 would we have allowed it to go through if it didn't make
12 sense, if it didn't set right, if it didn't -- I mean, just
13 something stunk, you know.

14 So when they came in and he said, "Remove that
15 sentence out of Rule 9," then I didn't have a problem with it.
16 But why was that sentence in there to begin with? So if that
17 sentence wasn't in there to begin with, I wouldn't have
18 anything to do with removing Rule 9.

19 But since that sentence was deemed illegal by the
20 parliamentarian having to explain to you at one point, "My
21 name is on the book," you know, "I know what I'm doing" -- he
22 did have to pull that rank on you because nobody was listening
23 to him as I guess nobody was listening for -- before, I guess.
24 I don't know. I wasn't part of those meetings.

25 Q. Did you have a problem with Rule 9 after that sentence was

1 struck?

2 A. No.

3 Q. Then why did you vote to strike Rule 9 as --

4 A. Didn't vote to strike Rule 9. We voted to set it aside, Matt.

5 Don't put words in my mouth. You know what happened.

6 Q. You voted to set aside Rule 9 as to Kalamazoo County only.

7 A. Right. And then we -- no, no. That is your words and that's

8 the lie that you've been spreading and it's got to stop

9 because I have video of this and if you want it, I'll sell you

10 the video. But we do have video of the whole thing and it

11 wasn't struck. It was set aside. Stop feeding those lies to

12 your minions on the Internet.

13 Q. Okay. First, you have video and you'll sell it to me?

14 A. I'm not going to give it to you.

15 Q. You own it?

16 A. Yeah.

17 Q. Who did the video?

18 A. None of your business.

19 Q. I'll take an answer to the question. Who did the video?

20 A. We did the video.

21 Q. Who did the video?

22 A. We did the video.

23 Q. Who's "we"?

24 A. Me and my video guy.

25 Q. Who's your video guy?

1 A. I'm not telling you.

2 Q. What's his name? You have to answer the question.

3 A. I have to answer the question?

4 Q. Yes.

5 A. Do you want to buy the video?

6 Q. I want to know the name of the person who did the video.

7 A. What happens when we watch the video and everything that

8 you've been saying is a lie? That's my question. I'll

9 actually let the video go, but what I want you to do is every

10 lie that you put out there on the Internet about striking

11 Rule 9 only for Kalamazoo is a blatant lie, Matt.

12 Q. Who took the video?

13 A. Kent Esmeyer(ph).

14 Q. Kent --

15 A. Yeah.

16 Q. -- Esmeyer?

17 A. Yeah.

18 Q. How do you spell it?

19 A. I have no idea.

20 Q. You don't know how to spell his name?

21 A. No, I don't know how to spell his name.

22 Q. Esmeyer?

23 A. Yeah.

24 Q. Like E-s-m-e-y-e-r maybe?

25 A. Could be. So are you going to retract every lie that you put

1 out there on the Internet? That's what I want to know, Matt.

2 Do you have the honor to do that? That's my question to you.

3 Q. Will you be producing the video on Friday according to
4 discovery requests?

5 A. I don't have anything that says a discovery request on there.

6 Q. Okay. Now, what is -- explain to me the lie. What do you
7 believe is a lie?

8 A. I believe that you're lying when you're breathing. When your
9 mouth is open right now for some reason, you know -- you
10 baffle me. I can't believe that I supported you. I can't --
11 I mean, it's one of the most -- I have regrets. The only
12 regret that I have when it comes to politics is supporting
13 you.

14 Q. Okay.

15 A. And then watching what you're doing with lies and just
16 dividing. I mean, I thought you could be an honorable, good
17 loser, but you're not, Matt. It's disappointing.

18 Q. What do you believe is the lie about setting aside --

19 A. I believe when --

20 Q. You have to wait. I know you're upset.

21 A. I'm not upset.

22 Q. Listen. I know you're upset. I know you want to lash --

23 A. I'm disgusted with you. This is different than upset.

24 Q. I know you want to lash out at me, okay?

25 MR. THOMAS: Knock it off.

1 THE WITNESS: I'm not lashing out. You're putting
2 words in my mouth.

3 MR. THOMAS: I'm going to object. You need to knock
4 that off. That's not a question. It's not professional.
5 Stop.

6 BY MR. DePERNO:

7 Q. You're getting upset and --

8 A. I'm not upset.

9 Q. -- you need to calm down.

10 A. I'm not upset.

11 MR. THOMAS: This is why you shouldn't be the lawyer
12 in this case, Matt.

13 BY MR. DePERNO:

14 Q. You need to calm down. The question is, what is the lie that
15 you think was told about setting aside Rule 9?

16 A. When you say strike and it was only for Kalamazoo, you are
17 totally mistaken.

18 Q. Okay. Explain to me why that is a mistake to say that.

19 A. Because it's a lie.

20 Q. Okay.

21 A. You're saying that it's only for Kalamazoo. You're creating
22 all kinds of hate and discontent with that narrative. So why
23 don't we go to the truth instead of a narrative? And when you
24 do find out that it is the truth when you do watch the video,
25 what are you going to do about it?

1 Q. Well, I want to see the video, obviously, but the question is,
2 are you saying today under oath that Rule 9 was set aside as
3 to the entire delegation, as to all counties?

4 A. Yes. I've got video. I just watched it. Just because you
5 guys believe --

6 Q. Okay. So --

7 A. Because Berrien went right along with the same thing.

8 Q. Okay. All right. Now I just want to be clear and I'm giving
9 you a chance to change your testimony now. But under oath,
10 you're saying that you just watched the video and --

11 A. From the way I understand it, yes.

12 Q. Let me finish asking the question. You're under oath. I'm
13 asking you a question. Are you saying that Rule 9 was set
14 aside as to every county?

15 A. From the way I understand it, yes.

16 Q. Don't give me this, "the way I understand it."

17 MR. THOMAS: Objection.

18 THE WITNESS: The way I understand it --

19 (Overlapping discussion.)

20 BY MR. DePERNO:

21 Q. Yes or no?

22 MR. THOMAS: He just answered it.

23 THE WITNESS: It's not a yes or no answer.

24 BY MR. DePERNO:

25 Q. Yes, it is. It's a yes or no question.

1 A. No, it's not. You asked me for my legal opinion once again,
2 which I don't have a legal opinion.

3 Q. All right. So when I point out you're under oath, then you
4 qualify your answer. Very good.

5 A. I would love to put you under oath and you qualify your
6 answers because you know you're lying. Aren't you more of a
7 witness than a lawyer in this whole case?

8 Q. Page 30 at the bottom you say -- this is on February 16th.
9 You say, "Go Linwood on them after we win!" What does that
10 mean?

11 A. I have no idea.

12 Q. Who is Linwood?

13 A. A lawyer.

14 Q. So are you saying, "Get a lawyer to go after them" after you
15 win?

16 A. No.

17 Q. What does "Go Linwood on them after we win" mean?

18 A. "Cause pain and" --

19 (Clarification by Reporter.)

20 THE WITNESS: I'm sorry. I was just reading out
21 loud.

22 (Short pause.)

23 THE WITNESS: Yeah. I don't know.

24 BY MR. DePERNO:

25 Q. You don't know what you meant?

1 A. No.

2 Q. Let's see. Page 38 at the top you say, "First come up with
3 list of who you want to sanction. Change the letterhead to an
4 official KGOP [sic] county committee letterhead on this
5 resolution." What are you discussing here?

6 A. Oh. Hillsdale had a good resolution.

7 Q. A resolution about what?

8 A. Empowering delegates.

9 Q. And so you're saying you wanted to -- number one, you're
10 talking about sanctioning people?

11 A. Yeah, it was politicians.

12 Q. What politicians?

13 A. Democrat politicians. I think this is something that -- yeah,
14 it was a resolution that they were sanctioning.

15 Q. Hillsdale was sanctioning --

16 A. Yeah.

17 Q. -- Democrats?

18 A. I believe so, yeah. I don't know.

19 Q. And what do you mean, "Change the letterhead to an official
20 Kzoo GOP county committee letterhead"?

21 A. Well, I didn't know what letterhead they would have had if
22 they had any at that point. But if they did, it would have
23 been a good, you know, resolution to use. I remember that. I
24 just don't know the specifics of it. It looks like the
25 download didn't come through.

1 Q. You wanted -- you wanted somebody to put a resolution on
2 Kalamazoo GOP letterhead?
3 A. County committee, but I didn't know they didn't have a county
4 committee. We have a county committee in Allegan.
5 Q. Well, Kalamazoo has a county committee. Do you understand
6 that?
7 A. Do they?
8 Q. Yes.
9 A. What's the official name of it?
10 Q. Kalamazoo County Republican Committee.
11 A. Okay.
12 Q. So on February 20th at the bottom of page 38, you and Sabrina
13 are talking about finding an attorney. What do you need an
14 attorney for?
15 A. We were probably looking at this lawsuit.
16 Q. February 24th on page 47 at the top you ask is there "Any
17 kickback from the lawyers letter?" What are you referring to
18 there?
19 A. I believe it was a letter to cease and desist.
20 Q. What kickback do you think there would be?
21 A. I think at that time she was looking on the Internet or
22 somebody -- your minions coming out after her on Telegram.
23 Q. What's a minion?
24 A. It would be, like, your -- I'd say Beverly Wheeler, Maggie
25 Kurtzell, John Chapman, Joe Brandis. I think they're your

1 minions. I think they do your bidding.

2 Q. You think I'm that involved, right?

3 A. I think -- I think it's sad that you resorted from going to be
4 our attorney general to becoming a Telegram terrorist to just
5 going out causing hate and discontent and divide. I would be
6 embarrassed.

7 Q. On February 24th in the middle, page 47, you say, "Dan Hartman
8 and his wife will be staying here this weekend to go over
9 strategies moving forward." What did you discuss at that
10 meeting?

11 A. They never came down.

12 Q. What is -- on page 48, what is the -- what are you discussing
13 about the D9 caucus, not certifying the D9 caucus?

14 A. Oh, yeah. That's when I got a call from John Smith and he
15 said that you would -- his exact words were, you would leave
16 District 4 alone if I voted to not register -- not -- if I
17 voted against D9 on our first state committee.

18 Q. Who would leave D4 alone?

19 A. You would.

20 Q. I would?

21 A. Yeah. He said you were helping him.

22 Q. I'm helping who?

23 A. He was working for you at this time because you were causing
24 hate and discontent in D9 and in D4 at the time.

25 (Clarification by Reporter.)

1 THE WITNESS: In District 9 and District 4. So
2 John Smith said Matt DePerno was telling him that they would
3 drop the hate and discontent and what they were doing in
4 District 4, you know, by saying we had a coup and all this
5 other stuff if I would vote against D9 during the state
6 committee caucus.

7 BY MR. DePERNO:

8 Q. So what was the issue with D9? I don't understand what the
9 issue was.

10 A. You know exactly what the issue was with D9. Your friend
11 Castiglia, who's probably funding you, is, you know, against
12 Mark Forton.

13 Q. And you believed what John Smith told you?

14 A. Well, yeah. I mean, absolutely. It's not that unbelievable
15 that you would be doing this, Matt. Your reputation has gone
16 horribly down the drain. So yes.

17 Q. And you said this is a "DePerno and Forton grudge match"?

18 A. You called it that.

19 Q. I did?

20 A. Yeah.

21 Q. When did I call it that?

22 A. Just now.

23 Q. I didn't say that. I'm reading --

24 A. You just said it.

25 Q. I'm reading --

1 A. Oh.

2 Q. -- what's written here.

3 A. Where?

4 Q. In that top left. It says --

5 A. Yeah. "DePerno and Forton grudge match," yep. Yeah, because

6 he -- according to Mark Forton because he wasn't going to

7 endorse you. You've had it out for D9 ever since according to

8 Mark Forton.

9 Q. And you believe that, also?

10 A. I believe actions. I look at your fruit and I watch what's

11 falling from your tree and it's rotten fruit, Matt.

12 Q. Who is Melonie? You're talking about --

13 A. Come on.

14 Q. On page 49.

15 A. You know Melonie Kurdys. She's the vice chair of the

16 Allegan --

17 Q. We're on page 49. In the top you reference someone named

18 Melonie. I asked who Melonie was. You said Melonie Curtis?

19 A. Kurdys.

20 Q. Kurdys.

21 A. I love this. You know exactly who she is.

22 Q. You don't like Melonie?

23 A. Melonie doesn't like me. I like everybody. I even like you,

24 Matt. I like Charley.

25 Q. Who is Bill that you're referencing up here at the top of page

1 49?

2 A. Huizenga(ph).

3 Q. Do you like Bill Huizenga?

4 A. I don't like the way Bill Huizenga votes.

5 Q. What don't you like about his vote?

6 A. What do you like about his vote? That's what I've got to ask
7 you.

8 Q. What don't you like about his vote?

9 A. I think he votes more like a Democrat than he does a
10 Republican.

11 Q. Give me an example.

12 A. The border. He's got a 30-percent rating on the border and he
13 thinks that an open border is a good thing, you know.

14 Q. You believe Bill Huizenga wants an open border?

15 A. Well, his voting record does.

16 Q. Okay. What else can you point to about Bill Huizenga's voting
17 record you don't like?

18 A. He endorsed you. Did he endorse you? I thought he supported
19 you. That would be something I don't like about him, his
20 voting record.

21 Q. Okay. You believe Bill Huizenga endorsed me? For what?

22 A. You had every endorsement, didn't you? You had the Trump
23 endorsement.

24 Q. So you say, "I will do everything in my power as D4 chairman
25 to make sure Bill loses ... said that I would be happier with

1 a Democrat." Why would you be happier with a Democrat?

2 A. Because you would know what a Democrat is up to. You know
3 they're against you. What's the most disappointing thing that
4 I see with the Republican party is that you expect something.
5 Like with you. I expected a lot from you and look what we
6 get. I mean --

7 Q. It's not about me.

8 A. No, it's not.

9 Q. You can try to make it about me, but it's not about me.

10 A. It's a lot about you.

11 Q. What are you doing right now to ensure that Bill Huizenga
12 loses?

13 A. I don't have to do anything right now to ensure that Bill
14 Huizenga loses. He's lost all the support of the people that
15 I know from Allegan County because of his voting record and
16 his stance.

17 MR. THOMAS: You know what? I'm going to object at
18 this point because you brought this up during motion hearings
19 with Bill Huizenga and you were talking about it's not
20 relevant and getting the judge to ask me questions in regard
21 to that and now you're asking about Bill Huizenga. So you're
22 either in or you're out on that. You either need to move on
23 or do something else because you specifically objected to
24 it.

1 BY MR. DePERNO:

2 Q. Are you working to find someone to primary Bill Huizenga?

3 A. I'm not.

4 Q. No?

5 A. Huh-uh.

6 Q. Is D4 working to primary Bill Huizenga?

7 A. I don't think so, no. No, not the body is not.

8 (Clarification by Reporter.)

9 THE WITNESS: The body of D4 is not, no.

10 BY MR. DePERNO:

11 Q. So other than the border, is there any other issues with Bill
12 Huizenga's voting record and you think he endorsed me? So
13 those two issues. Can you point to anything else?

14 A. No. I think -- I think that covers it.

15 Q. Are you trying to remove Melonie Kurdys from her position?

16 A. No, I'm not.

17 Q. Is anybody?

18 A. Possibly.

19 Q. Who?

20 A. I wouldn't know names. I wouldn't know who, but I know the
21 rumblings are he's --

22 Q. Rumblings from who?

23 A. What does this have to do with --

24 Q. Rumblings from who?

25 A. What does this have to do with --

1 Q. Rumbblings from who?

2 A. If you can tell me how this is relevant to the case I'll
3 answer it. I don't think it's relevant.

4 Q. Well, I believe it's relevant, so --

5 A. I don't believe it's relevant.

6 Q. So who's working then to remove Melonie Kurdys?

7 A. She's working to remove herself.

8 Q. Page 50 at the top you say, "Huizenga's team has been
9 interviewing my wife's coworkers."

10 A. Yeah, that's true.

11 Q. About what?

12 A. I have no idea, but he sent his team out to talk to my wife's
13 coworkers. I don't know if that's an intimidation tactic or I
14 don't know how you work, but --

15 Q. Who are your wife's coworkers?

16 A. I don't know. They're her coworkers.

17 Q. You don't know who they are?

18 A. No. I don't know which ones she was talking about. She just
19 said coworkers.

20 Q. And you believe that Huizenga sent a team out to interview
21 your wife's coworkers?

22 A. About me, yes. They also threatened to sue Kalamazoo from
23 what I heard, like they did Ottawa County.

24 Q. Who threatened to sue?

25 A. Boomer(ph), I believe.

1 Q. Boomer threatened to sue --

2 A. Is that his name? Boomer or -- I don't know what his other
3 little guy's name is.

4 Q. Boomer threatened to sue Kalamazoo County?

5 A. They said, "We don't want to have another event like Ottawa
6 happen here." So I don't know if that's a threat, but it
7 sounds like it. And then I had people going around and
8 interviewing my wife's coworkers.

9 Q. Were you in Washington, D.C. on January 6?

10 A. Yes.

11 Q. What were you doing on January 6?

12 A. I was at the Trump rally.

13 Q. Okay. Did you go to the Capitol?

14 A. I went to --

15 MR. THOMAS: Object. This is absolutely irrelevant
16 and I'm telling you, you don't need to answer that.

17 THE WITNESS: Okay.

18 MR. THOMAS: It's got nothing to do with this case,
19 zero. Unless you can articulate it on the record, he's not
20 answering that.

21 BY MR. DePERNO:

22 Q. Did you go to the Capitol?

23 MR. THOMAS: Objection.

24 THE WITNESS: I'm not answering.

25 MR. THOMAS: He's not answering the question. You

1 can bring it to the judge and ask him why you're talking about
2 that.

3 MR. DePERNO: Well, I'm talking about it --

4 MR. THOMAS: We're going to absolutely take it to
5 the judge and you can tell the judge why he needs to answer
6 that.

7 MR. DePERNO: Because they're talking about it in
8 their text messages.

9 MR. THOMAS: I don't care. It's not relevant to the
10 case. How is that relevant to the issues in our case?
11 Articulate it. Put it on the record, Matt. Put it on the
12 record right now.

13 MR. DePERNO: You need to calm down, Jimmy.

14 MR. THOMAS: No, I'm not going to calm down.

15 MR. DePERNO: You've got to stop yelling.

16 MR. THOMAS: You are asking questions that have got
17 nothing to do with what --

18 MR. DePERNO: You've got to stop yelling.

19 MR. THOMAS: I'm not yelling.

20 MR. DePERNO: You are yelling.

21 MR. THOMAS: You want to hear yelling? I can get my
22 voice up.

23 MR. DePERNO: You are yelling.

24 BY MR. DePERNO:

25 Q. So the FBI contacted you about January 6?

1 MR. THOMAS: Objection.

2 THE WITNESS: No. I'm not answering that.

3 BY MR. DePERNO:

4 Q. And you think it was Bill Huizenga that turned you in?

5 MR. THOMAS: Objection. Again, this is not relevant
6 to anything. Object.

7 BY MR. DePERNO:

8 Q. Yes, no?

9 A. I'm not answering.

10 MR. THOMAS: He can explain it to the judge. He can
11 explain these questions to the judge why these are relevant to
12 our case.

13 BY MR. DePERNO:

14 Q. Is Dave Clements your attorney?

15 A. No.

16 Q. On page 52 at the top you say, "If I get arrested it will go
17 out to David Clements. He will get it into the hands of Steve
18 Bannon and Tucker Carlson."

19 MR. THOMAS: Objection, again. Objection. We're
20 going to take these questions to the judge. Not answering the
21 question. Move on. I'm perfectly at ease at that. You can
22 explain your relevance, you know, to the judge why he needs to
23 answer these questions.

24 MR. DePERNO: Well, he's the District 4 chairman.

25 MR. THOMAS: I don't care. This has got nothing to

1 do with our case. And the judge was very specific when he
2 told you that. So you're violating a court order right now.

3 MR. DePERNO: Calm down, Jimmy.

4 MR. THOMAS: But at least you've got stuff to look
5 at to read. You didn't provide me with any discovery so I
6 could do that.

7 MR. DePERNO: Calm down, Jimmy.

8 MR. THOMAS: Yeah.

9 BY MR. DePERNO:

10 Q. On page 56 you're talking about preparing a flyer for
11 District 4 with "an elephant holding up a cross," and you say,
12 "would be cool"?

13 A. Page 56?

14 Q. Page 56.

15 A. Okay. Yeah.

16 Q. And you say, "Engaging, Educating, and Empowering Delegates
17 Through Christ, With, In Christ." Is that what you want the
18 slogan to be for District 4?

19 A. It's not.

20 Q. Well, I'm asking.

21 A. "Standing In The Gap" is the slogan for District 4.

22 Q. But was this an idea you had to be the slogan?

23 A. I don't think it was put on there as a slogan. Do you have
24 something against Christ?

25 Q. Me? No. Not at all. I'm asking you the question.

1 February 27th at page 58. There's a -- Sabrina sent out an
2 invitation to you for a Zoom call with Attorney Thomas. Did
3 you join that call?

4 A. I don't believe so. I don't remember.

5 Q. Page -- page 60 at the bottom, Sabrina asks you to contact the
6 MiGOP attorney, to contact the attorney that wrote the demand
7 letter. I assume the MiGOP attorney is Dan Hartman, is that
8 correct?

9 A. I believe so at the time.

10 Q. Is he not anymore?

11 A. At that time I believe so.

12 Q. Is he still?

13 A. I believe so.

14 Q. And did you contact Dan Hartman to speak to James Thomas?

15 A. Could have.

16 Q. But you don't remember?

17 A. I don't remember.

18 Q. Okay. Page 61 you say at the top, "Kelly and crew didn't
19 follow the law. They followed the followers rules of
20 traditions for disenfranchising the delegates." What are the
21 followers rules of traditions?

22 A. I would say the status quo of actually traditions and not laws
23 and rules and that's why we were so shocked on Saturday or
24 Friday night, you know, the 17th when, you know, the law had
25 to be followed and that's why they struck that rule, that

1 sentence out of Rule 9.

2 Q. Do you know Jason Mikkelsen [sic]?

3 A. Mikkelsen?

4 Q. Mikkelsen?

5 A. I know Jason Mikkelsen.

6 Q. Mikkelsen. Okay. Thank you. You do know him?

7 A. Yeah. He's on my District 4 committee. He's the guy that

8 does the tape-recordings for you and sends them to you.

9 Q. Are you trying to remove Jason from District 4?

10 A. I would love to remove Jason from District 4.

11 Q. Why?

12 A. Because he's tape-recording and sending you all of our

13 meetings. He's also a known liar. He'll stand up and say

14 things that aren't true. He seems to be working against us,

15 but I mean I won't remove him because I don't have that power

16 like Kelly does, unless you say I do. If I can do what

17 Kelly's doing, let me know because then I would get rid of

18 him.

19 Q. Do you not like when people record your meetings?

20 A. KGOP doesn't like it when people record their meetings. I

21 mean, so why would that be such a shock? I can't believe the

22 hypocrisy that you guys have. It's amazing. It's okay for

23 somebody to record my meeting, but not your meeting? It's

24 okay for us to have --

25 Q. What's the D4's policy on recording meetings?

1 A. You can record.
2 Q. Okay. So he can do it?
3 A. Yeah.
4 Q. And KGOP has a policy of no recording. You understand that?
5 A. Yes. So should I --
6 Q. Do you see the difference?
7 A. I should probably change it to having no recordings then.
8 Q. Well, I think that would be up to you as the chair to --
9 A. Do I have your support to do that?
10 Q. No. I'm asking you the question.
11 A. I'd love to have --
12 Q. I mean, you said there's a hypocrisy and I'm pointing out --
13 A. So we should make that -- make a note for me because what
14 we're going to do is start --
15 Q. Do you have bylaws yet?
16 A. No.
17 Q. Oh, okay.
18 A. Why would I?
19 Q. Maybe bylaws are the rules to run an organization. You might
20 want to think about getting them.
21 A. Do you promote that in all counties?
22 Q. I do.
23 A. Okay.
24 Q. I think every county --
25 A. Talk to VanBuren, you know.

1 Q. -- should have bylaws. I believe all counties should have
2 bylaws. Okay. Page 65, who is Chuck at the top?
3 A. I would be referring to Chuckie over there.
4 Q. Charley Coss --
5 A. Yeah.
6 Q. -- is Chuck?
7 A. Yep.
8 Q. And the masons? Who are the masons?
9 A. You know exactly who the masons are.
10 Q. Who are the masons?
11 A. You know who the masons are. The Masonic.
12 Q. Okay. What's the reference to the masons?
13 A. You'd have to think that there is a Masonic order of things
14 here with your -- with you and your group here I would think.
15 Q. You think the Catholic group is involved with the Free
16 Masons?
17 A. A fragment. I don't know. Possibly. I'm just trying to
18 explain what your -- what your motivations are and how your
19 network works and why people would be following, you know,
20 just -- just orders that go against the good of the country.
21 Q. So who's Ken DenHollander?
22 A. Keith DenHollander?
23 Q. I'm sorry. Keith DenHollander?
24 A. He's from Ottawa County. He's a gentleman that sued Ottawa
25 County when forcing them to redo their convention.

1 Q. And are you saying he's a Free Mason?

2 A. I'm just guessing.

3 Q. And that the masons took him down a degree or two? What does
4 that mean?

5 A. I don't know how that works.

6 Q. Okay. But you said it. So it seems to be -- do you generally
7 espouse wild conspiracy theories of which you have no fact or
8 basis to promote?

9 A. I would have to say I think thou doth protest too much right
10 now.

11 Q. Okay.

12 A. Your facial expression is telling me everything, Matt.

13 Q. So do you -- you didn't answer my question. Do you push
14 conspiracy theories where you have no facts --

15 A. Apparently not since you just found only one in here. So I
16 don't think it's much of a conspiracy to think that you guys
17 are involved in an organization of some kind that, you know,
18 is trying to stay in control in Michigan, whether that is the
19 boys club or whatever you guys have going on, coffee club. I
20 don't know what you call yourselves. But, you know, there is
21 a -- to think that there wouldn't be something like that, I
22 don't know.

23 Q. It doesn't sound like a very unifying message from you as the
24 District 4 leader?

25 MR. THOMAS: Is that a question or was that a

1 statement, Matt?

2 MR. DePERNO: It's a question.

3 MR. THOMAS: Well, what was the question? Because I
4 didn't hear it as a question.

5 BY MR. DePERNO:

6 Q. I said it doesn't sound like a very unifying message from the
7 D4 leader, does it?

8 A. That's not a question. I don't think that was a -- "does it"
9 at the end, does that qualify?

10 Q. Does it?

11 A. I don't think you should be the one preaching unity to anyone.

12 Q. I'm asking a question. Was I preaching it? Did you think I
13 was just preaching unity to you?

14 A. I believe so, the way you said the question.

15 Q. Do you think unity is a bad thing?

16 A. I think the unity that says, "Sit down, shut up," is a bad
17 thing. You know, "Take your place," you know, like you said
18 that. Yeah, I would say.

19 Q. Are you happy right now with the unity in the Michigan
20 Republican party?

21 A. You can't cause a disunity and then say that we're happy with
22 it. I mean, it's like you look at the people that are causing
23 disunity. They're everybody that are associated with you.
24 The fact that you haven't -- I would say that disunity is the
25 fact that you haven't conceded yet to the race, have you?

1 Q. To what race?

2 A. To the chair race.

3 Q. No.

4 A. Okay. Do you think that that causes unity? I think that's
5 causing disunity. The fact that you conceded right away to
6 Dana Nessel, right away, before the election was even over,
7 Matt. Right away. That's when I thought there was something
8 wrong with you.

9 I thought why would he do that? A man that's
10 supposed to be a part of election integrity and all of a
11 sudden, boom, I'm going to -- was it because she's got a
12 lawsuit against you, that you're being indicted? Is that why
13 you did it? Because you're not causing unity at all. So
14 don't preach to me about unity.

15 Q. So you seem to think that I'm solely responsible for the
16 disunity in the party?

17 A. I believe that -- great question. I believe, yes, right now
18 you are part of the biggest problem in the state of Michigan
19 to cause disunity. It's a definite probability, wouldn't you
20 say? Or else you would concede --

21 Q. Okay. Let's go to --

22 A. -- and move on.

23 Q. Let's go to page 84. You say at the top, "Counties can only
24 give us shit! They can complain, comment but no control."
25 And then Sabrina says, "We can have policy and procedures

1 which allow us to pick chairs." Explain to me this theory
2 that you and Sabrina are talking about where you believe you
3 can ignore county chairs and set policy and procedure to
4 select the county chairs. How does that work?

5 A. I think she was talking as a delegate. Because I don't have
6 the previous e-mails to gain reference on, I won't be able to
7 answer that one.

8 Q. Let's see. 84. All right. Here's 83. On 83 you are saying,
9 "We don't have to include county chairs unless they chair a
10 committee. Sweet. It's the second best news I've heard.
11 That made my day." And then you say, "How can we invite some
12 and not others?" Sabrina says, "Nothing requires us to
13 include county chairs."

14 A. Well, she's talking about going to our meetings.

15 Q. She says, "We should not include it in bylaws." She then
16 says, "Counties don't give the districts automatic positions."
17 And then you say, "We don't want it to be used on us." And
18 then we get into page 84 where you say, "Counties can only
19 give us shit! They can complain, comment but no control."
20 And Sabrina then says, "Agreed. We have to get rid of the
21 evil. We can have policy and procedures which allow us to
22 pick chairs." So what --

23 A. This is in context of allowing chairs to come to the District
24 4 meetings, so --

25 Q. So you're saying you can pick which chairs you want to attend

1 the meeting?

2 A. I wish I could. Yeah, that would be great, but I don't think
3 that that's right. I think if you're going to allow chairs,
4 then you should allow all the chairs. So that's what we're
5 adding to the bylaw part of things.

6 Q. And she says, "We have to get rid of the evil." Who is the
7 evil?

8 A. You'd have to ask Sabrina.

9 Q. Okay. That doesn't sound like a very unifying statement, does
10 it?

11 A. When we're fighting evil, then I guess it is, isn't it? I
12 don't know.

13 Q. Sounds to me like you're only fighting "evil" within the
14 Republican party. When are you going to go out and actually
15 start to fight Democrats?

16 A. When you concede.

17 Q. Okay.

18 A. Right? I mean, when you stop fighting us. So you blame us
19 for the fights that you're in. It's amazing. The hypocrisy
20 is beyond belief with you.

21 Q. Page 90 you say, "When you get a free moment let's talk. If
22 Jason shows up again, do we vote him out? We are not giving
23 county chairs or politicians a seat at the d4 table/
24 membership. They are not welcome at meetings unless invited
25 correct?" Then "Do we follow through with the Matt DePerno

1 resolution?" So let's unpack this. You add at one point the
2 thought about voting Jason out, correct?

3 A. Oh, like I said, that would be incredible to have a whole
4 team of people that nod heads, but you need people in an
5 organization that don't see things the same way. So I --
6 unless Jason continues to play his role, I think he's great.
7 I think what he's doing is, you know -- I don't disagree with
8 people that don't agree with me, you know. That didn't make
9 sense.

10 I think Jason is fine in our district committee,
11 unless you think I can get him out of there, like Kelly can
12 remove people. Do you support that? I mean, because this is
13 what we're talking about. This is exactly, you know, what she
14 did. She looked at people that did what he did and got rid of
15 him or got rid of those people, but you think it's so absurd
16 that I would want to get rid of somebody.

17 Q. You don't have bylaws?

18 A. I don't need bylaws.

19 Q. But you did just say a few seconds ago you're working on
20 them?

21 A. Yeah.

22 Q. Okay. So you are working on them, but now you say you don't
23 need them?

24 A. Well, VanBuren doesn't have them. You just named the counties
25 out there right now that don't have them. There's a lot of

1 them I don't think -- with the new redistricting, I think
2 there's quite a few districts that don't have bylaws right
3 now.

4 Q. I've heard about all kinds of stuff happening at VanBuren and
5 Allegan right now. It's pretty interesting to me. And then
6 why not give county chairs or politicians a seat at the D4
7 table? Wouldn't that be a unifying message to welcome them?

8 A. To welcome who?

9 Q. The county chairs or politicians to give them a seat at the
10 table.

11 A. They -- politicians already have a seat at the table. They're
12 our politicians. They are representatives. They hold a
13 position of power already. I believe that in this position
14 the delegates should be the ones that have the seat at that
15 table.

16 Q. And what is the "Do we follow through with the Matt DePerno
17 resolution?"

18 A. Oh, yeah. We had a great resolution to censure you.

19 Q. Why censure a private citizen?

20 A. You're not a private citizen. You haven't --

21 Q. I'm not?

22 A. You haven't conceded. So you're somebody that's actively
23 trying to overtake Kristina Karamo's position in the state of
24 Michigan.

25 Q. How am I actively doing anything to overtake her position?

1 A. How are you not? Come on.

2 Q. But, again, it's not me.

3 A. No. You've got your --

4 Q. But in --

5 A. We'll go back to the minions comment.

6 Q. In your resolution you stated that "Matt DePerno is the true
7 extremist." What does that mean?

8 A. I would say that you're the true extremist of extremists to
9 cause divide, to cause division. I would say that would be
10 the definition of that. You're the person that's trying to
11 cause division because you haven't given up your battle for
12 the Michigan Republican chair. So I would say that you're a
13 poor loser and I think that your actions prove it.

14 Q. And then on page 92, "Did they get notice from the clerk?" Do
15 you know what that meant?

16 A. No, I don't.

17 Q. Okay. And then down near the bottom on page 92, April 11th,
18 "Matt is f'n crazy"?

19 A. Yeah. I would say you've lost it.

20 Q. Okay.

21 A. I'm not -- the fact that I did study a little bit of
22 psychology, I can tell you that you are crazy.

23 Q. So then at the top of page 95 you say you're exposing "the
24 crazy anti America First people and their efforts of how they
25 are destroying the Republican Party so they can take over."

1 How do you think this is working right now where -- do you
2 actually believe there's what you refer to as a "crazy anti
3 America First people" that are trying to take over the
4 Republican party?

5 A. Yes.

6 Q. Do you believe that?

7 A. Yes, I do.

8 Q. Who do you think is leading the effort to -- and who do you
9 think is leading that effort?

10 A. I think you have a good part in it. I believe that CRG, the
11 Coalition for Responsible Government, the shadow government
12 brought up by Terri Lynn Land to create a shadow, you know,
13 government that -- I mean, I've seen the list of the people
14 that are on it that will be taking over when they can prove
15 that Kristina Karamo, you know, can't raise money and isn't a
16 good leader and the whole --

17 Q. Who are those people on that list?

18 A. Oh, the list -- I mean, way beyond. Go to Terri Lynn land and
19 ask her. I don't have the list. I know that Kenny Clevenger
20 was on the list.

21 Q. Kenny --

22 A. Clevenger.

23 Q. Kenny Clevenger is on the list --

24 A. Yeah.

25 Q. -- on Terri Lynn Land's list?

1 A. For the CRG.

2 Q. Am I on the list?

3 A. I don't know.

4 Q. And you said, "When they expose that Kristina cannot raise
5 money?"

6 A. Oh, yeah. Matt Hall, you know, talked to the HRCC.

7 Q. What does the HRCC have to do with this?

8 A. They're the ones that are calling up their big money donors
9 right now.

10 Q. But they've always done that.

11 A. To say, you know, that they need to donate all their money to
12 HRCC and not give any money to the MiGOP because they want to
13 prove that Kristina can't raise money.

14 Q. Well, I think you're misreading that.

15 A. No, I'm not misreading it.

16 Q. The HRCC has always done that. They've always tried to divert
17 money to their agency and away from MiGOP.

18 MR. THOMAS: Is that a question?

19 BY MR. DePERNO:

20 Q. Do you think this has something to do --

21 MR. THOMAS: Can we ask questions again, please?

22 BY MR. DePERNO:

23 Q. Do you think this has to do with Karamo specifically?

24 A. You know it does.

25 Q. And you said that "Terri Lynn Land's agency, CRG, wants to

1 take over when they can prove that Kristina can't raise
2 money."

3 A. When they get the vote of confidence or however you're going
4 about it. That's why you haven't conceded. If you didn't
5 have hopes, wouldn't you concede? If you weren't in an active
6 plot to overthrow Kristina, wouldn't you concede? I believe
7 you would. Most normal people would.

8 Q. I think it's an interesting conspiracy theory.

9 A. I think it's the only way you can win an election is to do
10 that.

11 Q. Who is "missionary position Tamara Mitchell" on page 96?

12 A. I have to say that's one of your screaming minions.

13 Q. Okay. Why do you refer to her as "missionary position
14 Tamara Mitchell"?

15 A. Because I think it is a fraud that she calls herself a
16 missionary. So I made fun on that, yes.

17 Q. So you're making a sexual innuendo against Dr. Mitchell?

18 A. I'm saying that she shouldn't call herself a missionary. The
19 only way that she can say that she was a missionary is if she
20 was on her back with her legs spread, yes.

21 Q. Wow. Now I've looked through all these text messages. I've
22 seen you make no type of sexual comments like that against
23 men. Why just against a woman?

24 A. I'm saying she's a fraud.

25 Q. Okay. Then you say, "My wife wants to punch her now." That's

1 the way it's done, right?

2 MR. THOMAS: I'm going to object. We're getting
3 into spousal, spousal immunity. You don't have to answer
4 anything about your spouse.

5 MR. DePERNO: Well, it's written right here.

6 MR. THOMAS: I don't care. It's spousal immunity.

7 MR. DePERNO: Then it's waived --

8 MR. THOMAS: It's not waived.

9 MR. DePERNO: -- because he wrote about it. It
10 is.

11 BY MR. DePERNO:

12 Q. "My wife wants to punch her now." So, again, this is how it
13 works, right? You make derogatory sexual comments about
14 Dr. Mitchell. You say that your wife wants to physically
15 assault her. And then what do you do? You ask for
16 forgiveness from that?

17 MR. THOMAS: Again, I'm going to object. You're way
18 outside the relevance of our complaint.

19 MR. DePERNO: I'm not.

20 MR. THOMAS: You're way outside -- what is it
21 relevant to?

22 MR. DePERNO: Calm down, Jimmy.

23 MR. THOMAS: What issue?

24 MR. DePERNO: Calm down. Stop yelling.

25 MR. THOMAS: What issue is this relevant to?

1 MR. DePERNO: Stop yelling.

2 MR. THOMAS: What is it relevant to?

3 MR. DePERNO: It gets directly to the issue of your
4 slander complaint, which I can explore because --

5 MR. THOMAS: My slander complaint as far as what?
6 What issue in my slander complaint would this --

7 MR. DePERNO: You raised the issue that there is
8 slander because there was a reference to a Christian cult
9 mentality.

10 MR. THOMAS: Yeah, you. You are the defendant that
11 said that.

12 MR. DePERNO: I'm not a defendant.

13 MR. THOMAS: You are -- you are a defendant. You
14 said you are.

15 MR. DePERNO: I'm not a defendant.

16 MR. THOMAS: Well, we'll see if the judge disagrees
17 with that.

18 BY MR. DePERNO:

19 Q. So that's how it works, right, with the Christian cult
20 mentality, correct?

21 A. So are you calling me a Christian cult?

22 Q. I'm asking you --

23 A. You're saying that I'm a Christian cult?

24 Q. I'm asking --

25 A. Did you just accuse me of being a Christian cult?

1 Q. No, no. I'm not accusing you of that. I'm asking you if
2 that's how it works within the Christian cult?
3 A. I have no idea because I'm not part of the Christian cult
4 community.
5 Q. Based on your -- now, Tamara Mitchell is a delegate, right?
6 A. I assume so.
7 Q. She's a delegate in the 4th District. You just made a sexual
8 reference to her. Your wife has stated she wants to punch her
9 in the face. Will you now as the District 4 chair resign
10 based on that comment?
11 A. Absolutely not.
12 Q. Page 106 you say, "Kelly just raised a white flag." What do
13 you mean by that?
14 A. I believe she wanted to -- she was talking to Kenny Clevenger
15 and she wanted to -- you'd have to ask Kenny what she wanted
16 with that, but -- she wanted peace at that time.
17 Q. Was that a bad thing, wanting peace?
18 A. It depends on what she wanted with the peace, I guess.
19 Q. Page 110. You're talking about John Smith. You say, "I told
20 Jon Smith; God makes an enemy of our enemy." What does that
21 mean?
22 A. It's a Bible verse. God will make an enemy of your enemy.
23 Q. Who's the enemy that you're making or he's making? I'm not
24 sure of the reference.
25 A. I'd say Maggie and probably you.

1 Q. And me you said?
2 A. Yeah, probably you.
3 Q. So it's about me again, right?
4 A. I would say yes.
5 Q. And who are the enemies that we're talking about? The enemy
6 of the enemy, who's that?
7 A. I would say you made me your enemy.
8 Q. I did?
9 A. Yeah.
10 Q. How did I make you my enemy?
11 A. How?
12 Q. Yeah. What did I do to you?
13 A. You got on the phone and you were calling people and telling
14 them that -- you know, weren't you trying to send around a
15 petition against me?
16 Q. No.
17 A. No?
18 Q. No.
19 A. So I was getting calls from people saying, "Matt DePerno
20 called me up" and was trying to turn them against me is what I
21 was getting.
22 Q. I've not done any petition against anybody.
23 MR. THOMAS: Is that a question?
24 BY MR. DePERNO:
25 Q. You actually believe that I had a petition against you?

1 A. Yes.

2 Q. And you think that is why I'm your enemy?

3 A. No. I believe that you're against all America First people.

4 Q. But specifically about you, who told you that I -- who are the
5 delegates that called you and said I started a petition
6 against you? Who are these people?

7 A. They're the Kalamazoo delegates.

8 Q. What delegates? Give me a name.

9 A. I'm not going to give you a name because I don't think that
10 you would --

11 Q. You have to.

12 A. -- do the same thing.

13 Q. I'm asking you to give me a name.

14 A. I don't know the names. I know the conversations I've had,
15 you know, but I don't know the names. I don't remember the
16 names.

17 Q. Now suddenly you don't remember their names?

18 A. That's right. I don't remember their names.

19 Q. But you believe that I had a petition against you?

20 A. I believe that, yeah. I believe that you -- yeah, absolutely.

21 Q. Okay. So if that's true, why didn't you call me up and ask if
22 that had happened?

23 A. Because you haven't been very nice, Matt. I mean, the text
24 messages that you've had with me is less than nice. Why would
25 I want to talk to somebody that treats me the way you did on

1 the text message.

2 Q. On page 118, this goes back to the Kalamazoo clerk. You say,
3 "Got the Email, powerful letter from clerks lawyer. Kelly and
4 the crazys should not be able to continue their bs." What do
5 you mean by that?

6 A. You didn't get the letter?

7 Q. I'm asking you what you meant by it.

8 A. I meant that she's not going to be able to keep writing
9 letters, getting rid of delegates.

10 Q. Why do you believe that?

11 A. Because the lawyer said that she -- that she can't do that
12 anymore.

13 Q. You read in that letter that the clerk's office said Kelly
14 Sackett can't get rid of delegates?

15 A. Yeah. You didn't read that? You still believe that you can
16 get rid of delegates for not agreeing with you? I'm asking
17 you.

18 Q. I'm asking you about the letter. You think there's something
19 in that letter that says that the county chair can't remove
20 delegates?

21 A. Yes.

22 Q. Page 120 you're talking about removing a Battle Creek district
23 member from District 4 at the top. Who's that person?

24 A. She showed up. Yeah, she showed up. So I don't remember --
25 I don't remember her name off the bat.

1 Q. You said, "I think after the third unexcused absence she is
2 gone." What is that based on?

3 A. That's based on other people's bylaws and if you look at the
4 District 6 bylaws, which is what we inherited, but we didn't
5 adopt the rules. It's either, like, the third unexcused
6 absence, someone not showing up to a meeting.

7 Q. Is the Good Neighbor Program a program you created?

8 A. I helped with it, yeah.

9 Q. Who else helped you with that program?

10 A. It was Kristina Karamo.

11 Q. She helped create it?

12 A. Uh-huh. Yeah.

13 Q. At the top of 122 you talk about -- you say, "We are
14 prioritizing our efforts on the largest fire and that is
15 cleaning up the QVF and keeping illegal massive data dumps
16 from happening." What is -- explain that to me. What do you
17 mean by that?

18 A. Didn't you run on this?

19 Q. What did you mean by that?

20 A. You ran on election integrity and I've got to explain this one
21 to you?

22 Q. Yes. What did you mean by that?

23 A. The data dumps, like, going back to 2012 during the 2020
24 election.

25 Q. What data dumps?

1 A. The data dumps that have been dropping in.

2 Q. What data dumps?

3 A. You don't know what they are. I understand why you didn't
4 follow through with --

5 Q. No, I'm asking you --

6 A. -- your commitment to go after election integrity. And you're
7 over-talking me. So what data dumps?

8 Q. Yes.

9 A. The data dumps that the QVF shows, you know, when --
10 April 10th I believe, you know, you'd have, like, a whole
11 bunch of data that was entered into the qualified voter
12 file.

13 Q. April 10th?

14 A. Yeah. They had, like, markers where you could see where the
15 data was being downloaded into the QVF when you look at the
16 numbers.

17 Q. And cleaning up the qualified voter file, what is that going
18 to do?

19 MR. THOMAS: What is the relevance of this with our
20 lawsuit? I'm objecting. Please put on the record --

21 MR. DePERNO: He's the District 4 chair.

22 MR. THOMAS: What does that have to do with our
23 lawsuit? What does that have to do with our lawsuit, Sabrina
24 and Kim's claims against you guys? What does that have to do
25 with us? Because you're way outside the boundaries of what

1 the judge said you could ask. So put it on the record right
2 now, please, what this has to do with it.

3 MR. DePERNO: Is that your objection?

4 MR. THOMAS: I'm objecting to your --

5 BY MR. DePERNO:

6 Q. So what is the QVF --

7 MR. THOMAS: Don't answer. If he's not going to put
8 it on the record, then don't answer the question.

9 MR. DePERNO: We can't explore this issue?

10 MR. THOMAS: No. You're not putting the relevance
11 on there. I'm objecting to the relevance on it. You're
12 outside the parameters of the judge's order.

13 MR. DePERNO: A relevance objection is never a good
14 objection in --

15 MR. THOMAS: I don't care.

16 MR. DePERNO: -- a deposition.

17 MR. THOMAS: The judge told you that you needed to
18 be within the parameters of our lawsuit and you are not. So
19 that's the judge's order. Unless you can articulate a reason
20 why you're going into this subject for our lawsuit, he doesn't
21 need to answer that. It's way outside the boundaries.

22 MR. DePERNO: Okay.

23 MR. THOMAS: Well, obviously I'm right because you
24 can't articulate it.

25 MR. DePERNO: I don't think you're right at all.

1 MR. THOMAS: Good. Well, you can bring it up to the
2 judge.

3 MR. DePERNO: You're just saying you're refusing to
4 answer any questions about his theories about the QVF or these
5 massive illegal data dumps that he thinks is happening?

6 MR. THOMAS: What does that have to do with our
7 lawsuit? How is it relevant to our lawsuit?

8 MR. DePERNO: Relevant is not a good objection for a
9 deposition.

10 MR. THOMAS: The judge gave you parameters of
11 talking and asking questions to both him and Joel Studebaker.
12 He gave you parameters. If it's not within the boundaries of
13 that, then you're not in the relevance of our lawsuit and
14 you're just fishing. Probably for your overthrow of Karamo,
15 so --

16 BY MR. DePERNO:

17 Q. Did you watch the video on Bluewater Health Living where Dan
18 Hartman said that it is outrageous, I think he said, that
19 "We've allowed non-Christian voices into the marketplace of
20 ideas"?

21 A. I don't remember watching it, no.

22 Q. Well, you posted it on, I think, page 123.

23 A. 123? Is there a number at the bottom of yours?

24 Q. Well, there's no number at the bottom of that page for some
25 reason, but it's between 122 and 124.

1 A. And where is this?

2 Q. Well, on May 12th --

3 A. What's the time stamp?

4 Q. 10:42. Sabrina Pritchett-Evans says -- she posts an article
5 that says, "KGOP Chair Kelly Sackett calls on MiGOP in-house
6 counsel to resign." Do you see that?

7 A. Yeah.

8 Q. And then you said, "Time to resign her," and you posted a
9 video of an interview with Mark Forton and Lisa Manciewicz
10 and --

11 A. Ken Beyer.

12 Q. Okay. That's with Ken Beyer?

13 A. Yeah.

14 Q. Okay. You said, "I told her to resign and apologize!" What
15 Kelly Sackett was saying, is my understanding, is she was
16 telling Dan Hartman to resign because of his --

17 A. Yeah.

18 Q. -- because of his statement that it was "crazy that we've
19 allowed non-Christian ideas into the marketplace," right?

20 A. I don't know.

21 Q. You don't know?

22 A. But I doubt if that's what he said if it's coming out of you.

23 MR. THOMAS: Unless you're going to pull the whole
24 clip up of what he said instead of just a little segment of
25 what you always try to say, you've got to give him the whole

1 piece if you're going to have him read it or look at it. Not
2 just the one clip because it's taken out of context.

3 BY MR. DePERNO:

4 Q. I'm looking at a news article that states -- it's called --
5 it's on the Detroit News from May 9th, 2023. "Michigan
6 GOP lawyer, 'Crazy to allow non-Christian voices in the
7 marketplace of ideas." Specifically Dan Hartman is quoted as
8 saying, "It's crazy as Christians that we're allowed any other
9 voice" -- I'm sorry, I'm going to repeat that -- "It's crazy
10 as Christians that we've allowed any other voice but a
11 Christian voice into the marketplace of ideas."

12 A. Are you going to play the clip?

13 MR. THOMAS: I'm objecting because it's --

14 MR. DePERNO: I don't have the clip.

15 MR. THOMAS: I'm objecting because it's not the
16 whole clip. You're only giving him a segment of what was
17 actually said. So as your objections were to all my stuff
18 that you don't have a completeness of what you are reading to
19 him and you want him to read something out of context.

20 BY MR. DePERNO:

21 Q. Do you not recall Dan Hartman saying that? Because you're
22 specifically talking about it in your interview with Mark and
23 Lisa.

24 A. All I remember talking about to Mark and Lisa was the fact
25 that you had a one star rating as a lawyer. I mean, that's

1 what I remember in that conversation. I looked you up as I
2 was driving in and I'm, like, "Man, I was going to vote for
3 this guy for Attorney General and he's got a one star rating
4 as a lawyer?" That's what I remember of that whole
5 conversation.

6 Q. When you said, "Time to resign her," you're referring to Kelly
7 Sackett, right?

8 A. Absolutely. She needs to resign and apologize.

9 Q. For what? For saying that Dan Hartman should resign? Because
10 that's what the context of this conversation was.

11 A. You don't know what the context of that conversation was.
12 What I'm saying there is she needs to resign and apologize for
13 what she's done to the delegates and what you're defending her
14 for.

15 Q. So are you not wanting to answer the questions about why you
16 wanted Kelly Sackett to resign in this context and this
17 context being that she asked Dan Hartman to resign because of
18 his statement that "We should only allow Christian voices in
19 the marketplace of ideas"?

20 A. No, it wasn't just in that context. And I haven't seen the
21 clip, so I can't answer that question unless you want to show
22 me the whole entire video. Because that to me, the Detroit
23 Free Press giving a little snippet on what he said, that isn't
24 what he said. I can just tell you that's probably not what he
25 said. I would like to see what the entire --

1 Q. Okay. So you're testifying that you --

2 A. I'm saying --

3 Q. Hold on, hold on. I'm saying you're testifying that you
4 gave an interview with Mark and Lisa, Mark Forton and Lisa
5 Manciewicz, and it wasn't about the comment about Kelly
6 Sackett asking Dan Hartman to resign?

7 A. It was about CRG, what we just talked about, and it was about
8 the fact that you became an Internet Telegram troll and the
9 fact that I should have -- and whoever I'm ever going to give
10 money to before they become a politician, I'm going to Google
11 their business and find out if they're worth the salt that
12 they claim to have. One star rating.

13 (Exhibit 5 marked for identification.)

14 (Recess taken from 12:24 p.m. until 12:31 p.m.)

15 BY MR. DePERNO:

16 Q. Did you ever live in Maricopa County?

17 A. That would be Mesa.

18 Q. Mesa County?

19 A. Yeah.

20 Q. Is Maricopa in Mesa County or are they different counties?

21 A. I believe so.

22 Q. Tell me about the warrant for your arrest for disorderly
23 conduct.

24 A. I don't remember a disorderly conduct. When was it?

25 Q. You testified earlier that there was no warrants; you never

1 had a warrant out for your arrest. That wasn't true, was it?

2 A. I didn't know -- I wasn't aware of a warrant being out for my
3 arrest, no.

4 Q. You're not aware of several warrants out for your arrest
5 coming out of Maricopa County?

6 A. No.

7 Q. You've never been contacted by the police out of Arizona or
8 Maricopa County regarding a disorderly conduct charge?

9 A. I don't remember being contacted by the police for a
10 disorderly conduct, no.

11 Q. Giving you Exhibit 5. This is a letter written by Kenny
12 Clevenger. Do you recall this?

13 (Long pause.)

14 A. Yep, I remember it.

15 Q. Do you agree with Kenny's idea or not?

16 A. No.

17 Q. Why not?

18 A. Which idea specifically? There's numerous ideas on the --

19 Q. Let's start at the top. Why don't you read through it? What
20 ideas do you not agree with?

21 A. What I don't agree with is the fact that he did not -- he
22 signed it Allegan County GOP chair and Allegan County Vice GOP
23 chair --

24 (Clarification by Reporter.)

25 THE WITNESS: He signed it the AGOP Chair and AGOP

1 with Melanie Kurdys, Vice-Chair. I don't agree with the
2 letter as a whole because he should have talked to the other
3 officers. He should have talked to the EC and probably should
4 have talked to the delegates before submitting any type of
5 letter like this.

6 BY MR. DePERNO:

7 Q. Why would he have to talk to the Executive Committee before
8 sending a letter?

9 A. You would -- you would have to ask that question, Matt. And I
10 would say because he did not get the -- this is the root of
11 the problem if you want to pay attention. He doesn't have the
12 power to do so. He didn't talk to his officers. He didn't
13 talk to the EC and he acted as the Allegan County chair.

14 Q. Isn't he the Allegan County chair?

15 A. Yeah, but that doesn't give him the right to weigh opinions on
16 this type of a decision using the Allegan County chair or, you
17 know, Melanie's vice chair's position. You're confused. This
18 is what the whole problem is is that you think he does have
19 the right to do that confronting -- without talking to the
20 body, without talking to the EC or communicate with anybody.
21 So that's why we're in this mess.

22 Q. That's why we're in this mess. Didn't the delegates --

23 A. I'm glad you agree.

24 Q. Didn't the delegates elect Kenny Clevenger and Melanie
25 Kurdys?

1 A. Not to act on his own, like Kelly with "the power invested in
2 me." I mean, as a -- as our Allegan County GOP chair, he
3 doesn't have the right to act outside the body.

4 Q. Then what's the point of having a chair and a vice chair?

5 A. To facilitate.

6 Q. No. They're elected for a purpose and that's to run the
7 organization and they're given authority during the election
8 and through bylaws to act on behalf of the organization. I
9 think that's not what you -- you don't understand that. You
10 think that the chair and the vice chair have to go to the body
11 for every decision, don't you?

12 A. Not every decision. Paying the light bill and doing things
13 like that, no, but when they're making the decision that is
14 trying to overthrow an election, which would be the district
15 caucus, I think that that's something that they should
16 absolutely talk to the --

17 Q. And what informs you to have that opinion?

18 A. What informs me?

19 Q. Yeah.

20 A. I don't understand your question.

21 Q. What is your opinion based on to make that -- to make you come
22 to that conclusion?

23 A. I understand why you want to understand that. I really do.
24 It's how -- we're supposed to be ran by the delegates, the
25 body. It's not supposed to be one person making these

1 decisions.

2 Q. Why? What informs you of that? Why do you believe that?

3 A. I believe the constitution does, don't you? Doesn't the
4 Michigan constitution do that and state law and, you know,
5 Allegan County bylaws specifically say that he's not supposed
6 to do a letter like this?

7 Q. You've already said that Allegan County doesn't have bylaws.

8 A. I did not say that Allegan County doesn't --

9 Q. Yes, you have.

10 A. No, I did not.

11 Q. You said it several times.

12 A. I did not.

13 Q. Does Allegan County have bylaws?

14 THE WITNESS: Can we go back and look?

15 (Off-the-record statement by Reporter.)

16 THE WITNESS: No, I never said that Allegan --

17 BY MR. DePERNO:

18 Q. Does Allegan County have bylaws?

19 A. Yes.

20 Q. Okay. You believe the constitution --

21 A. And I believe that --

22 Q. You believe the Michigan constitution dictates -- hold on.

23 You believe the Michigan constitution dictates the way a
24 county political party is run?

25 A. I think the philosophy is in the constitution. You know, it

1 gives us the freedom, you know, for the people to rule. With
2 the bylaws here what it says is that he is not supposed to
3 act alone without talking to the officers, the EC, or the
4 delegates.

5 Q. Didn't the body elect him to act by electing him as chair?

6 A. We elected him to follow the bylaws.

7 Q. Do you understand the concept of free association under the
8 constitution?

9 A. No. Why don't you explain it to me?

10 Q. You don't know what free association is?

11 A. Why don't you tell me?

12 Q. Well, it means that people of like mind, like political ideas,
13 have the freedom to associate without government interference.
14 Does that make sense?

15 A. Uh-huh.

16 Q. Okay. So then in what way would the constitution dictate to
17 a county political party what they're supposed to do? I'm
18 confused by that.

19 A. You would be.

20 Q. I am confused by your statement as to how the constitution
21 plays into this issue of dictating to a private organization
22 how you're supposed to act.

23 MR. THOMAS: And I'm going to object to drawing
24 legal conclusions. If you think you can answer it, answer it.
25 If not, let's move on, please.

1 THE WITNESS: We're moving on.

2 BY MR. DePERNO:

3 Q. You can't answer it?

4 A. No. We're moving on.

5 Q. Okay. So you can't answer it, correct?

6 A. I answered the question regarding this. If you want to get
7 into a constitutional debate, I guess we could do that
8 later.

9 Q. What else do you not like about the letter other than the fact
10 that you believe he didn't have authority to send it?

11 A. I don't think he had authority to write any of this according
12 to the bylaws. Do you have the Allegan County bylaws in front
13 of you?

14 Q. I do not have the bylaws.

15 A. Okay.

16 Q. Okay. So everything you think is based on the Allegan County
17 bylaws and no authority to send the letter?

18 A. Exactly.

19 Q. Do you know Ron Riseter(ph)?

20 A. Yes.

21 Q. Is he a friend of yours?

22 A. He's an associate.

23 Q. What does that mean, an associate?

24 A. Somebody that I've gotten to know. I don't know if I consider
25 him a friend yet. We don't --

(Exhibit 6 marked for identification.)

BY MR. DePERNO:

Q. This is Exhibit 6. This is an e-mail you sent out talking about a closed District 4 meeting --

A. Yes.

Q. -- on July 20th.

A. Yeah.

Q. Why is the meeting closed?

A. Because we want to keep it closed.

Q. Was there a vote taken to close the meeting?

A. I don't have to close -- I don't have that vote to close the meeting.

Q. You don't think you have to take a vote as the district chair to close a meeting?

A. Did the Kalamazoo GOP do anything? Did they take a vote to close all their meetings?

Q. I'm asking you a question.

A. I'm asking you. I mean, what precedence are you asking? I mean, because this is one more of these hypocrisies that you're throwing out there.

Q. You don't think that under Robert's Rules you have to first --

A. No.

Q. -- get a vote to close a meeting?

A. No, absolutely not.

Q. Do you have to give certain advance notice to people?

1 A. Five days.

2 Q. Where is that laid out?

3 A. State law. We went through this last week and at the state
4 meeting, so I understand that.

5 Q. And this was sent out before that state committee meeting or
6 after?

7 A. July 10th?

8 Q. So you say in here that you're going to conduct a hearing on
9 July 20th regarding the dismissal of duly elected delegates by
10 the Kalamazoo County chairperson, is that correct?

11 A. Yep.

12 Q. You claim that the delegates were removed without precedent
13 and statutory authority, right?

14 A. Absolutely.

15 Q. How long have you been involved specifically in the Michigan
16 Republican party?

17 A. Involved as in politicswise?

18 Q. Yeah.

19 A. I became a delegate in August.

20 Q. So you've made the statement a lot today where you've said,
21 "This is the problem," right? This is the problem. You've
22 become a delegate in August --

23 A. Is this a question?

24 Q. Yes.

25 A. Okay.

1 Q. You've become a delegate in August. You're now district
2 chair. You now want to hold a hearing to talk about delegates
3 being removed without precedent and yet you've only been
4 involved for less than a year, correct?

5 A. Yep.

6 Q. Do you see that as a problem?

7 A. No, not at all.

8 Q. Okay. Now when you say, "delegates were removed without
9 precedent," I'll ask you, based on the history of the Michigan
10 Republican party over, let's say, the last 40 years, has a
11 county chair ever removed a precinct delegate?

12 A. I don't know.

13 Q. Well, you say without precedent in your letter.

14 A. Yep.

15 Q. So tell me how it's without precedent if you don't know if
16 it's ever been done before. Because you don't know, do you?

17 A. I know what she did is wrong.

18 Q. You don't know, do you? Answer the question.

19 A. Do you have precedence?

20 Q. I just asked you a question and you're not answering the
21 question. Do you know?

22 A. No, I don't.

23 Q. No, you don't know. You don't know anything prior to August
24 of 2022, correct?

25 A. That is why I will be having somebody else chair the meeting

1 for this meeting.

2 Q. No, but that's not what you wrote.

3 A. And I hope it's going to be an Ottawa County person. That

4 would be great.

5 Q. That's not what you wrote. You wrote, "These Delegates were

6 removed without precedent and without statutory authority."

7 So let's stick just to the without precedent. You just

8 acknowledged you don't know if there's precedent, right?

9 A. I don't think there is precedence. So I'm going based on my

10 knowledge, there's no precedence.

11 Q. So why didn't you write, "These delegates, to my knowledge,"

12 or you could have wrote, "These delegates were removed without

13 precedent, to my knowledge"? Or you could have wrote, "I've

14 only been involved since August of 2022, so I really have no

15 idea."

16 A. Can I ask what the relevance in this case is?

17 Q. Yeah, because this case is entirely about, as you've said,

18 removal of delegates. So we get to explore the District 4's

19 knowledge of county politics, state politics, and district

20 politics of which --

21 A. Settle down, Matt. Settle down, Matt. Settle down. Relax.

22 Settle down. Lower your voice or I'm leaving. If you're

23 going to get intimidating toward me like that, I'm out of

24 hereSo if you're going to threaten -- I mean, that's --

25 Q. I'm going to threaten you?

1 A. Well, look at you. You got out of your seat practically.
2 Q. No, I didn't.
3 A. Yes, you did. Settle down. Ask it in a civil manner.
4 Q. I'm asking it in a civil manner.
5 A. No, you're not. You're badgering me.
6 Q. Because you're not answering the question.
7 A. I answered the question three times if you would listen.
8 Q. Okay. Give it again.
9 A. What do you want me to say? I'm going to say I have as much
10 precedence as what Kelly had to remove her people. So tell me
11 where she had the precedence to do that and where -- now since
12 she's done that, I guess I can do the same thing to her. I
13 can do the same exact thing to her that she did to the other
14 people, can't I? Based on your argument.
15 Q. It's been done many times in the past.
16 A. Okay. Well, great. Then why are you disagreeing with --
17 MR. THOMAS: Is that a statement or a question? My
18 God.
19 BY MR. DePERNO:
20 Q. Okay. We're talking about the ability of the county chair to
21 remove a delegate, which has been done in the past, within the
22 last 40 years, which you didn't know about, but yet you made a
23 statement saying it's without precedent. You also say it's
24 without statutory authority. Do you know what MCL 168.599
25 is?

1 A. So what you're telling me is I can't do to her what she's did
2 to other people. So you're arguing with yourself.

3 Q. No, I'm not.

4 A. Yes, you are. You're looking right in a mirror right now and
5 arguing an argument that you're fighting for right now with
6 Kelly.

7 Q. Well, we're going to get to that. But we're talking
8 specifically about your statement saying the chair -- there's
9 no precedent and it's without statutory authority, which
10 you're wrong about. Do you agree with that?

11 A. I'm not agreeing to that.

12 Q. Okay. Now, under what authority does a district chair have to
13 remove a county chair?

14 A. The same authority that you're giving Kelly.

15 Q. Has it ever happened in the past? In the last 40 years has a
16 district chair ever removed a county chair?

17 A. Has it?

18 Q. No. Where's the precedent? And where's the statutory
19 authority that allows it? Where's your bylaws that allow it?
20 Three questions I asked you right now. Where's the precedent
21 for a county chair or a district chair to remove a county
22 chair?

23 A. It doesn't say. I can't. So state --

24 MR. THOMAS: So, again, you're way outside the
25 parameters.

1 MR. DePERNO: No. I'm right inside the parameters.

2 MR. THOMAS: Object --

3 (Overlapping discussion.)

4 MR. DePERNO: I am right in the parameters right
5 now.

6 MR. THOMAS: What does a district chair --

7 MR. DePERNO: I am right in the parameters.

8 MR. THOMAS: No, you're not.

9 MR. DePERNO: Stop interrupting my question.

10 MR. THOMAS: Stop. I'm objecting.

11 (Overlapping discussion.)

12 MR. THOMAS: I'm objecting.

13 MR. DePERNO: Well, you can object --

14 MR. THOMAS: You're outside the parameters.

15 MR. DePERNO: I am right in the parameters.

16 MR. THOMAS: No, you're not. What does it have to
17 do with a district chair -- there's no county person that's
18 been removed by a district at this point. It hasn't
19 happened.

20 MR. DePERNO: Stop yelling, Jimmy.

21 MR. THOMAS: No, I'm not going to stop.

22 MR. DePERNO: Stop yelling, Jimmy. Calm down.

23 So can I get back to my question?

24 MR. THOMAS: No.

25

1 BY MR. DePERNO:

2 Q. What is the precedent for a district chair to remove a county
3 chair?

4 MR. THOMAS: It hasn't happened here, so I'm
5 objecting. It's outside the parameters.

6 MR. DePERNO: It's never happened. I agree with
7 you. It's never happened.

8 MR. THOMAS: It has not happened at this point.

9 BY MR. DePERNO:

10 Q. What statutory authority --

11 MR. THOMAS: It's not even ripe, Matt. Objection to
12 ripeness on this question.

13 MR. DePERNO: Okay.

14 MR. THOMAS: It's not ripe.

15 MR. DePERNO: Are you done with your objection?

16 MR. THOMAS: No. I'm going to object as soon as you
17 open your mouth again. Go ahead.

18 BY MR. DePERNO:

19 Q. What authority does the district chair have to remove -- what
20 statutory authority does the district chair have to remove a
21 county chair?

22 MR. THOMAS: Objection. He asked and answered. He
23 told you the same thing that Kelly did to the delegates that
24 he can do there at the district. So he's already asked and
25 answered that question. I just answered it because he's

1 already told you. So move on. He asked and answered it.

2 BY MR. DePERNO:

3 Q. You say, "During the hearing" -- "During the meeting, a
4 hearing will be conducted to allow all parties involved to
5 present their perspectives." Are they allowed counsel?

6 A. Did she allow counsel?

7 Q. Okay. You have to stop answering my questions with a
8 question.

9 A. Well, I'm just saying. I'm just going based on what you're
10 doing already in Kalamazoo. The same thing is happening here,
11 so --

12 MR. THOMAS: Objection. It's not ripe. It hasn't
13 happened. It hasn't happened yet and it's got nothing to do
14 with our case.

15 MR. DePERNO: It has everything to do with our
16 case.

17 MR. THOMAS: No, it doesn't.

18 BY MR. DePERNO:

19 Q. So getting back to our question --

20 MR. THOMAS: It's not ripe.

21 BY MR. DePERNO:

22 Q. -- is counsel allowed?

23 MR. THOMAS: It's not ripe. It's not relevant, not
24 part of this case.

25

1 BY MR. DePERNO:

2 Q. Is counsel allowed at your inquisition?

3 MR. THOMAS: You don't have to answer. Let him take
4 it to the judge.

5 BY MR. DePERNO:

6 Q. Are you refusing to answer?

7 MR. THOMAS: No. He's going to let you take it to
8 the judge. You can ask the judge if that's an appropriate
9 question under the parameters that you were allowed to take
10 this depo in the first place.

11 MR. DePERNO: This is exactly related to our case.

12 MR. THOMAS: It's not related. It hasn't happened.
13 It's not ripe.

14 BY MR. DePERNO:

15 Q. Do you know that I am out of town on July 20th and that I
16 announced that in court on July 3rd?

17 A. I don't think I invited you.

18 Q. So you can't have counsel?

19 A. It's a closed meeting.

20 MR. THOMAS: Objection, objection, objection. It's
21 not ripe. It hasn't happened.

22 BY MR. DePERNO:

23 Q. You say, "We aim to thoroughly examine the actions taken by
24 the chair [sic] ..." Under what authority in the district --

25 MR. THOMAS: Objection. It's not ripe.

1 MR. DePERNO: Will you stop --

2 MR. THOMAS: It's not part of this case.

3 MR. DePERNO: Will you stop interrupting me?

4 MR. THOMAS: No.

5 MR. DePERNO: Wait till I'm done asking the question
6 and then you can object.

7 BY MR. DePERNO:

8 Q. What authority does the District 4 chair have under the
9 District 4 bylaws to call in the county chair and "evaluate
10 whether she has the authority to act in this manner and should
11 she remain in power"?

12 MR. THOMAS: Objection. It's not relevant to our
13 case. It's outside the parameters. It's not ripe. It hasn't
14 happened yet, all these things. So let's move on. You don't
15 have to answer it. He can take it to the judge and ask him if
16 that's an appropriate question.

17 MR. DePERNO: It's directly related to our case.

18 MR. THOMAS: It's got nothing to do with it.
19 Nothing to do with it. What he does to somebody else has
20 nothing to do with what Kelly did to the delegates in this
21 case.

22 BY MR. DePERNO:

23 Q. When did you first become associated with Sabrina
24 Pritchett-Evans?

25 A. Right before February 17th.

1 Q. Are you saying under oath today you didn't have a conversation
2 with Sabrina Pritchett-Evans before February 17th?
3 A. I said before. Listen closely, Matt. I said before.
4 Q. When?
5 A. I don't know specifically. It wasn't, like, a highlight of my
6 existence. I didn't write it down. I have no idea. It was
7 before.
8 Q. Okay.
9 A. I don't know how much before.
10 Q. Was it before January 1st or after January 1st?
11 A. I don't know.
12 Q. Was it before Christmas or after Christmas?
13 A. Your text message thread should tell you.
14 Q. You're suggesting that the text messages were the first time
15 you communicated with her?
16 A. I'm suggesting that probably if you're going to get down to
17 the specific date.
18 Q. The first text message in here is February 3rd. Did you have
19 any contact with Sabrina Pritchett-Evans before February 3rd
20 of 2023?
21 A. Possibly, but not much before that. I'd say within a week or
22 two of that.
23 Q. Did you help Sabrina Pritchett-Evans set up any Telegram
24 groups?
25 A. Telegram groups? No.

1 Q. Did you help Sabrina Pritchett-Evans set up any chat groups
2 following her loss as county chair on December 12, 2022?

3 A. No.

4 Q. How did you first become associated with Kim Harris?

5 A. I don't remember.

6 Q. How did you first become associated with Joel Studebaker?

7 A. I met Joel at the Ottawa County convention.

8 Q. You said earlier that you hope someone from Ottawa County
9 chairs your inquisition on July 20th?

10 A. My inquisition?

11 Q. Is that right?

12 A. It's not an inquisition. Could you rephrase that question?

13 MR. THOMAS: Well, you just answered the question.
14 You said inquisition and you said it's not an inquisition. So
15 he can ask you something.

16 BY MR. DePERNO:

17 Q. Okay. You said you hope someone from Ottawa County chairs
18 your kangaroo court on July 20th?

19 MR. THOMAS: Objection to the terminology. It's not
20 an appropriate question. Very unprofessional, inappropriate.

21 THE WITNESS: Any more like that and I'm out of
22 here. I'm done with this whole conversation.

23 BY MR. DePERNO:

24 Q. You said earlier you think someone from Ottawa County would
25 chair your meeting on July 20th?

- 1 A. I would like somebody from Ottawa County to. I would like
2 somebody from Allegan County to. I want somebody other
3 than -- somebody that's involved with the management of
4 District 4 or have any type of -- that could have any type of
5 really bias towards what's going on. I would like someone to
6 be fair so we can have a fair hearing.
- 7 Q. What's the purpose of a hearing when there is a court hearing
8 on the morning of July 20th, right?
- 9 A. Aren't you arguing that this is a political issue and should
10 be handled by the party? I mean, that's really what I'm
11 trying to do here is, like, handle it by the party and not
12 worry about the court having to get involved.
- 13 Q. But you're not inviting everybody from the party?
- 14 A. No, it's closed. Just like the meetings in Kalamazoo are
15 closed and you said earlier I could have a closed meeting,
16 so I'm having one.
- 17 Q. No. Actually, I said you can't have a closed meeting because
18 you didn't vote on a closed meeting.
- 19 A. Well, you don't have to vote on a closed meeting.
- 20 Q. Actually, Robert's Rules says you do.
- 21 A. No, it doesn't. Show me in Robert's Rules where it says it
22 does.
- 23 Q. How did you become associated with Anna Kamp?
- 24 A. I'm not associated with Anna Kamp.
- 25 Q. Have you ever met Anna Kamp?

1 A. I met Anna Kamp at a convention in Grand Rapids was the first
2 time I met her, but I met a lot of people --

3 MR. THOMAS: I'm going to object at this point
4 because Anna Kamp was quashed by the judge. It's outside the
5 parameters of questions that we need to be asking here, Matt.

6 MR. DePERNO: That's totally false.

7 MR. THOMAS: What's false? Put on the record what's
8 false.

9 MR. DePERNO: The judge said all communications
10 regarding Anna Kamp would be turned over.

11 MR. THOMAS: Anna Kamp?

12 MR. DePERNO: Yeah.

13 MR. THOMAS: You're saying that Anna Kamp was
14 granted by the judge?

15 MR. DePERNO: Isn't that right? I think that's
16 right.

17 MR. THOMAS: I think you should read up on that,
18 Matt.

19 MR. DePERNO: I can. Let's see.

20 MR. THOMAS: Represented by Greg Todd, Anna Kamp and
21 Mike Labadie, your motions to quash were granted by the Court.

22 (Short pause.)

23 MR. DePERNO: No. The Court said that on or before
24 July 21, Mr. Studebaker and Mr. Beyer shall produce any and
25 all communications with Mike Labadie and Anna Kamp.

1 MR. THOMAS: I don't recall that.

2 MR. DePERNO: Sorry, Jimmy. You're wrong.

3 MR. THOMAS: No, I'm not wrong.

4 MR. DePERNO: So I can ask about Anna Kamp.

5 MR. THOMAS: And he asked and answered. He said he
6 doesn't know Anna Kamp and doesn't have an opinion. So asked
7 and answered.

8 MR. DePERNO: No, that's not what he said. He said
9 he met her at a convention in Grand Rapids. Sorry, Jimmy, pay
10 attention.

11 BY MR. DePERNO:

12 Q. So at this convention in Grand Rapids, when was it?

13 A. When I was leaving there was a guy across the street --

14 Q. What day?

15 A. It would have been Saturday. There was a guy across the
16 street and he rolled up on a bicycle in a clown uniform and
17 just started, "I hate Republicans." And he started screaming,
18 "F you" and that type of thing, and I said, "I love you." And
19 the guy said, "I love you, too, man," and then he rolled away.
20 And then the girl standing next to me said she liked it and I
21 met her and that was it.

22 Q. What date?

23 A. I don't know. Whenever the convention in Grand Rapids was.

24 Q. Their county convention?

25 A. No, state.

1 Q. The county --
2 A. That would be the state convention in April, I believe.
3 Q. April of 2022?
4 A. Whenever it was, yeah.
5 Q. How did you meet Mike Labadie?
6 A. I don't know Mike Labadie like that. I've never met him.
7 (Clarification by Reporter.)
8 THE WITNESS: I said I've heard a lot about him, but
9 I've never personally engaged with him.
10 BY MR. DePERNO:
11 Q. Have you ever participated in a Unite America rally
12 coordinated by Bernadette Smith?
13 A. In Kalamazoo?
14 Q. Anywhere.
15 A. Yeah, in Kalamazoo I did.
16 Q. Did you speak at the rally?
17 A. Yeah.
18 Q. At the rally did you present your political ideas?
19 A. I imagine so.
20 Q. Did you present your religious views at the rally?
21 A. Probably.
22 Q. Are you planning to run for elected office?
23 A. No.
24 Q. Have you ever given public remarks at the Capitol in
25 Washington, D.C. on January 6?

1 A. No.

2 MR. THOMAS: Objection again, not relevant.

3 BY MR. DePERNO:

4 Q. Have you ever publicly or privately stated that you were with
5 Ashli Babbitt on January 6, 2021 just prior to her death at
6 the Capitol?

7 MR. THOMAS: What does that have to do with this?
8 Objection. It's got nothing to do with -- you don't have to
9 answer that. It's got nothing to do with this case.

10 BY MR. DePERNO:

11 Q. Have you ever publicly or privately stated that Ashli Babbitt
12 was next to you before her death at the Capitol on January 6,
13 2021?

14 MR. THOMAS: Objection. What does it have to do,
15 Matt? Put it on the record why this is relevant to this case.
16 Put it on the record, please.

17 MR. DePERNO: It goes to --

18 MR. THOMAS: I thought so.

19 MR. DePERNO: It goes directly to the issues you've
20 raised in your slander claim.

21 MR. THOMAS: Yeah, what? Like, what? Him being
22 next to Ashli Babbitt, what does that have to do with this
23 case? How does that have to do with something with slander?

24 MR. DePERNO: Well, you wrote it in your complaint.

25 MR. THOMAS: I wrote Ashli Babbitt?

1 MR. DePERNO: No, not Ashli Babbitt, but you raised
2 the issue. You stated that, "It's slander to state that the
3 plaintiffs want to focus on burning down the party, where
4 raising money and getting Republicans elected is not
5 important, but instead they desire to push a radical agenda
6 through a Christian only cult mentality that will purify the
7 party and only" --

8 MR. THOMAS: You should know that by heart because
9 you wrote that.

10 MR. DePERNO: -- "and only when the party is
11 purified will the party be able to attract the right kind of
12 donors needed to transform the party into their image."

13 MR. THOMAS: Yeah. And Ken Beyer's got nothing to
14 do with that. And being in D.C. and around Ashli Babbitt,
15 what does that have to do with that?

16 MR. DePERNO: Well, I think we can explore the
17 issues of the anarchist minds of delegates.

18 MR. THOMAS: No, object. You can make that argument
19 to the judge.

20 MR. DePERNO: Okay. So you don't want to answer any
21 questions about that?

22 MR. THOMAS: Not about that. Talking about D.C. and
23 Ashli Babbitt is ridiculous. You're grasping for straws.
24 Here's my relevant questions so far that I've jotted down that
25 you've asked. (Indicating)

1 BY MR. DePERNO:

2 Q. Is Sabrina Pritchett-Evans currently a precinct delegate?

3 A. Yes.

4 Q. Have you ignored the removal of her from her position as a
5 precinct delegate in Kalamazoo?

6 MR. THOMAS: What was the question? Can you repeat
7 the question?

8 BY MR. DePERNO:

9 Q. Have you ignored the removal of Sabrina Pritchett-Evans as a
10 precinct delegate in Kalamazoo County?

11 A. Why would I be ignoring what -- I mean, I don't understand
12 what you're talking about. What am I ignoring?

13 Q. The removal. Her removal as a delegate. Have you ignored
14 that?

15 A. Who's removed her?

16 Q. The Kalamazoo County chair. The Kalamazoo County party has
17 removed her as a delegate.

18 A. The clerk only has that power.

19 Q. You think the Democrat elected Kalamazoo County clerk has the
20 power to remove a county party elected position?

21 A. Show me where I'm ignoring any type of order from anybody that
22 would have any type of authority other than you and Kelly
23 Sackett to remove a delegate.

24 Q. Have you allowed Sabrina Pritchett-Evans to act in any
25 capacity of District 4 vice chair after she was removed as a

1 precinct delegate?

2 A. Show me where she was removed as a delegate and I'll answer
3 that question.

4 Q. So I take it that you don't want to -- you refuse to answer?

5 A. You refuse to give me context of where she was removed.

6 Q. You received -- you've seen a letter sent by the Kalamazoo
7 County party removing both Sabrina Pritchett-Evans and Kim
8 Harris as delegates, correct?

9 A. Where was the letter sent to?

10 Q. Well, I'm asking you.

11 A. I'm asking you. Where was the letter sent and when was it
12 sent? Because I never saw a letter like that sent to
13 District 4. And besides that, what makes you think that that
14 is an authority to remove a delegate? Give me the proof that
15 she has been removed as a delegate.

16 Q. There was a vote taken in Kalamazoo County where she was
17 removed as a delegate. So have you ignored that?

18 A. She was not removed as a delegate. Show me where she was
19 removed as a delegate?

20 Q. She was removed.

21 A. She was not removed as a delegate. She's still a delegate.

22 Q. She's not a delegate.

23 A. She's a delegate.

24 Q. You can say that, but --

25 A. You can say that she's removed, too. You're full of shit.

1 Q. I'm asking the question, have you ignored that removal
2 notice?

3 A. I have not seen a legitimate removal of Sabrina
4 Pritchett-Evans.

5 Q. Likewise, have you ignored the removal of Kim Harris as a
6 delegate in Kalamazoo County?

7 A. I've not received any evidence from any authority that can
8 remove Kim Harris as a delegate.

9 Q. Have you allowed Kim Harris to act in any capacity pertaining
10 to District 4 after she was removed as a delegate in Kalamazoo
11 County?

12 A. I object to the premise that she was removed as a delegate.

13 Q. Have you allowed Sandra Vander Lugt to act in any capacity
14 pertaining to District 4 after she was removed as a Kalamazoo
15 County delegate?

16 A. I have not seen anything pertaining to her being removed as a
17 delegate that I would believe would be a legal standing.

18 Q. Have you had any conversations with Sandra Vander Lugt about
19 the pending criminal charges against her for assault and
20 battery on Dr. Tamara Mitchell at the KGOP Executive Committee
21 on April 10, 2023?

22 MR. THOMAS: Objection. This has got nothing to do
23 with -- you can answer if you know the thing, but --

24 THE WITNESS: What? Is there charges against her
25 right now?

1 BY MR. DePERNO:

2 Q. Have you had any conversations with Sandra Vander Lugt about
3 the pending criminal charges against her for assault and
4 battery on Dr. Tamara Mitchell at the KGOP Executive Committee
5 meeting on April 10, 2023?

6 A. I don't remember any conversation with her about it.

7 Q. Have you allowed Christine Augustine to act in any capacity
8 pertaining to District 4 after she was removed as a delegate,
9 a precinct delegate in Kalamazoo County?

10 A. Now she moved. She's no longer a delegate. So, no, she has
11 not acted since she's moved out of her precinct.

12 Q. Is it the responsibility of the District 4 chair to inform the
13 state party chair when District 4 committee persons become
14 ineligible to serve for any reason?

15 MR. THOMAS: I'm going to object to this. Again,
16 you're talking about things that are going on in the district
17 that have got nothing to do with the county. It's outside the
18 parameters. It's not -- it's not relevant.

19 BY MR. DePERNO:

20 Q. I'll take an answer.

21 MR. THOMAS: No, no, no. You don't have to give an
22 answer to that. And he's already answered. He said he
23 doesn't know. He already said he doesn't recognize it as
24 being removed.

25 MR. DePERNO: I'll take an answer.

1 MR. THOMAS: He already answered the question.

2 MR. DePERNO: He hasn't answered that question.

3 MR. THOMAS: He has answered the question.

4 MR. DePERNO: Different question.

5 MR. THOMAS: Not a different question. It's the
6 same irrelevant question that you've been asking.

7 BY MR. DePERNO:

8 Q. Yes or no?

9 A. What was the question?

10 Q. Is it the responsibility of the District 4 chair to inform the
11 state party chair when District 4 committee persons become
12 ineligible to serve for any reason?

13 A. It's the -- no.

14 Q. No? Okay. Have you provided any information to Dan Hartman
15 regarding this case?

16 A. No.

17 Q. Is it the responsibility of the District 4 chair to make
18 committee adjustments when District 4 committee persons become
19 ineligible to serve?

20 MR. THOMAS: I'm going to again object. Same
21 objection that I've been putting on the record. How does this
22 have anything to do with our case? What is the relevance for
23 our case? You're outside the parameters of the Court's order.

24 MR. DePERNO: I'm not --

25 MR. THOMAS: You are outside the parameters. Put it

1 on the record.

2 MR. DePERNO: Again, relevant objections are
3 inappropriate in any deposition.

4 MR. THOMAS: You had parameters by the judge that
5 was put on you with these depositions.

6 MR. DePERNO: Which is directly related to the
7 case.

8 MR. THOMAS: How is it relevant to our case?

9 MR. DePERNO: Whether or not the District 4 chair
10 recognizes the removal of precinct delegates is absolutely
11 relevant. But, again, it's an inappropriate objection.

12 MR. THOMAS: I don't care if it's inappropriate.
13 You can call it all you want. I don't care what you call it.

14 BY MR. DePERNO:

15 Q. Yes or no?

16 A. I'm not answering that.

17 Q. You won't even answer a simple question like that. Have
18 you informed Kim Harris that she is ineligible to serve in
19 District 4 because she is no longer a Kalamazoo County
20 Republican precinct delegate?

21 A. You haven't shown me any evidence from an authority that she
22 has been removed besides Kelly's letter.

23 Q. I'll take that as a no. Have you informed Sandra Vander Lugt
24 that she's ineligible to serve in District 4 because she's no
25 longer a Kalamazoo County Republican precinct delegate?

1 A. She is still a delegate. All of these people, except for
2 Christina Augustine, are still delegates.

3 Q. Have you taken any steps to include Kalamazoo County
4 Republican party officers, Executive Committee members, in
5 your District 4 meetings?

6 A. No.

7 Q. Have you taken steps to exclude Kalamazoo County Republican
8 party officers and Executive Committee members from your
9 District 4 meetings?

10 A. No.

11 Q. Will you in the future agree to invite Kalamazoo County
12 officers, Kalamazoo County Republican party officers and
13 Executive Committee members to your District 4 meetings?

14 A. That would be up to the body.

15 Q. Were you at the Allegan County Executive Committee meeting on
16 June -- in June of 2023?

17 A. Yes.

18 Q. Did you address the members at that meeting?

19 A. Yep.

20 Q. Were you aware that the Kalamazoo County chair, Kelly Sackett,
21 was present?

22 A. Yes.

23 Q. Did you speak about the current pending litigation in this
24 case?

25 A. Yes.

1 Q. What exactly did you say regarding Kalamazoo County in your
2 role as chair of District 4?

3 MR. THOMAS: Objection. How is he going to say
4 exactly what he said? I mean, you mean paraphrase? Because
5 he's not going to be able to say exactly unless you -- well, I
6 know that Kelly videoed or taped it or whatever, so -- do you
7 need him to say exactly what he said?

8 BY MR. DePERNO:

9 Q. You can paraphrase if you'd like.

10 MR. THOMAS: Go ahead. If you can answer the
11 question, answer it.

12 THE WITNESS: I don't really know exactly what I
13 said.

14 BY MR. DePERNO:

15 Q. Were you asked to refrain from talking about the ongoing
16 litigation by the Allegan vice chair?

17 A. Asked to stop talking about what?

18 Q. Were you asked to refrain from talking about the ongoing
19 litigation by the Allegan vice chair?

20 A. No. What I remember is that she asked me to expound on it.

21 Q. Did you -- did you make the comments about the Kalamazoo chair
22 that it is your intention to have the district decide Kelly
23 Sackett's fate?

24 A. Did I say fate? I don't think I said fate.

25 Q. Well, what did you say?

1 A. I don't know specifically what I said. You've got the
2 recording, play it.

3 Q. Well, if you know you didn't say fate, then what do you think
4 you said?

5 A. Well, that's not a word that I would normally use.

6 MR. THOMAS: Object to speculation. He already said
7 he doesn't know.

8 BY MR. DePERNO:

9 Q. Did you ever have a discussion with Sabrina Pritchett-Evans
10 about running for chair of Kalamazoo County Republican party
11 in the fall of 2022?

12 A. I don't remember talking about that, no.

13 Q. Have you had any communications with Sabrina Pritchett-Evans
14 and Anna Kamp prior to the December 4 caucus in February of
15 2023?

16 A. No. Possibly Sabrina. I mean, if we talked about if we were
17 running together, I guess, but I don't -- nothing to do with
18 Anna.

19 Q. Did you have any communications with Kim Harris and Anna Kamp
20 prior to the District 4 caucus in February 2023?

21 A. I would have communications with Kim Harris, but not Anna
22 Kamp. What does Anna Kamp have to do with District 4?

23 Q. Have you ever made any statements about struggles with Tony
24 Lorenz as chair of the Kalamazoo County Republican party?

25 A. Nope.

1 Q. Were you involved in creating any District 4 Telegram
2 groups?

3 A. Nope.

4 Q. When did you decide to run for District 4 chair?

5 A. I think six weeks before.

6 Q. Are you aware that Kim Harris describes herself as a Kalamazoo
7 County precinct delegate captain?

8 A. I wasn't aware of it.

9 Q. Have you had any communications with Kalamazoo County precinct
10 captains?

11 A. Who would be the captains?

12 Q. Anyone who may --

13 A. If you're saying that she's a captain, then yes, I've worked
14 with and talked with Kim.

15 Q. Do you think people who are no longer precinct delegates
16 should hold positions only designated as precinct delegate
17 positions?

18 MR. THOMAS: In what context? As District 4, in the
19 state, in the county? Where at?

20 MR. DePERNO: I don't think it matters.

21 MR. THOMAS: It matters because you're asking him --
22 you're asking a guy that's the chair who's already told you
23 that he doesn't recognize your layoffs or whatever you want to
24 call them, so --
25

1 BY MR. DePERNO:

2 Q. Do you think that people who are no longer precinct delegates
3 should hold positions only designated as precinct delegate
4 positions?

5 A. Like you in the state committee or the EC?

6 Q. It's just a simple yes or no question.

7 A. I'm just saying. I mean, you're there and you weren't a
8 delegate.

9 Q. I am a delegate. Yes, I'm a delegate. You did not know
10 that?

11 A. No, I didn't.

12 Q. Okay. Yeah, I'm a delegate.

13 A. Okay.

14 Q. Do you think that people who are no longer precinct delegates
15 should hold positions only designated as precinct delegate
16 positions?

17 A. Not based on your definition of who's a delegate and who isn't
18 a delegate.

19 Q. Okay. That aside --

20 MR. THOMAS: Asked and answered now. He asked and
21 answered your question.

22 MR. DePERNO: It's not an answer.

23 MR. THOMAS: It is. He did answer it.

24 BY MR. DePERNO:

25 Q. It's just a simple question.

1 A. I gave you a simple answer, Matt.

2 Q. Do you care about county autonomy within the Republican
3 party?

4 A. As long as it's good autonomy.

5 Q. Do you condone the alleged stealing of votes in the
6 presidential election of 202?

7 A. Do I condone?

8 Q. Yeah.

9 MR. THOMAS: Objection. And, again, what does that
10 have to do with our case? Please put it on the record. No --
11 (Overlapping discussion.)

12 MR. THOMAS: He doesn't have to answer the question.
13 Put it on the record why that's relevant.

14 BY MR. DePERNO:

15 Q. If there was fraud in the 2022 election and you could prove
16 someone defrauded voters in Allegan County, would you pursue
17 removing them or asking them to resign from office?

18 MR. THOMAS: Objection, it's speculation. We're not
19 going to speculate if something was going to happen in 2022
20 for purposes of your question. And it's got nothing to do
21 with this case. It's got nothing to do with it. So don't
22 answer the question. Let him explain it to the judge why it's
23 relevant.

24 BY MR. DePERNO:

25 Q. Do you care about election integrity?

1 A. Explain it to the judge.

2 Q. Do you care about election integrity?

3 A. Of course I care about election integrity.

4 Q. So if you had a situation in your Allegan County Executive
5 Committee, would you expect them to resign?

6 A. What kind of --

7 Q. Well, it's a question based on the prior two questions.

8 A. If anyone within the Allegan Republican party did what Kelly
9 Sackett did, yes, I would expect her to resign.

10 Q. Okay. That has nothing to do with the question. Do you think
11 you need to use courts to address inter-party matters?

12 A. No.

13 Q. And yet you have financially supported this lawsuit,
14 correct?

15 A. I financially supported a bunch of people that were being
16 illegally --

17 MR. THOMAS: Object. It's been asked and answered.
18 He told you 500 bucks or whatever he donated earlier.

19 BY MR. DePERNO:

20 Q. Do you think a person's religious practices should determine
21 their position in an organization?

22 A. Nope.

23 Q. What form of governmental organization and representational
24 theory do you subscribe to in simple terms?

25 A. Representative republic.

1 Q. Would regionalism or centralism be preferred in a state or
2 district party?

3 MR. THOMAS: Do you want to define that, regionalism
4 or centralism? Do you want to define those terms? Because
5 it's a multi-question. You've got two questions in one
6 there.

7 BY MR. DePERNO:

8 Q. Would you like regionalism or centralism --

9 MR. THOMAS: I don't care how you ask it. Just ask
10 one at a time.

11 BY MR. DePERNO:

12 Q. -- in a state or district party? It's one or the other. It's
13 A or B. It's not a compound question.

14 MR. THOMAS: Well, he can say neither if he wanted
15 to.

16 MR. DePERNO: Well, he could say neither.

17 THE WITNESS: Neither.

18 BY MR. DePERNO:

19 Q. What preferred form would you like to see?

20 A. I'd like to see the counties in charge of being empowered. I
21 believe the counties should, you know -- I think it should be
22 more localized.

23 Q. So you would prefer more regionalism than centralism?

24 A. Is that your answer to my question?

25 Q. I'm trying to understand your answer. I mean, when you say

1 more local, isn't that more regional?

2 A. Regional I'm looking at what region, you know. A region is
3 more than a precinct level or a county level.

4 Q. So what's the purpose do you think of the district
5 organization within the MiGOP?

6 A. What's the purpose of it?

7 Q. Yeah.

8 A. Right now to fight you. That's what our whole purpose has
9 been for this last little bit is just to keep battling the
10 fires, keep putting out the fires that you keep starting. So
11 I think the purpose should be to help, you know, win elections
12 against Democrats. That's what it should be, but you're not
13 allowing us to do this because you won't concede. You won't
14 step down.

15 You just continue to play this charade that you're a
16 one-star lawyer wanting to be an attorney general and we all
17 believed in you. And then you burned every single bridge of
18 everybody that reached out to help you during the election.
19 You burned more bridges than anybody I've ever met.

20 Q. How many fundraisers have you had in District 4 since
21 February 18 of 2023?

22 A. One.

23 Q. How much money did you raise?

24 A. I don't know. I'd have to ask the treasurer.

25 Q. What was the fundraiser?

1 A. It was a beach party.

2 Q. When was it?

3 A. A month ago.

4 Q. Do you think you could do better than one fundraiser in --

5 A. Oh, yeah.

6 Q. -- six months?

7 A. We've got a plan to raise the money.

8 Q. Do you think your beliefs are inherently correct in guiding
9 your decision making in District 4?

10 A. Absolutely.

11 Q. Are there examples where compromise of principles is
12 necessary?

13 A. No.

14 Q. When did you decide to remove Kelly Sackett and Charley Coss
15 from chair and vice chair positions in the Kalamazoo County --

16 MR. THOMAS: Again, I'm going to object. This is
17 outside the parameters. It's not ripe. It hasn't happened
18 yet. You're going into an area that the judge said you're not
19 supposed to be in, so -- it's got nothing to do with our
20 case.

21 MR. DePERNO: He didn't say that at all.

22 BY MR. DePERNO:

23 Q. So when did you decide to remove Kelly --

24 MR. THOMAS: You don't have to answer the
25 question.

1 BY MR. DePERNO:

2 Q. -- Sackett and Charley Coss?

3 MR. THOMAS: It has nothing to do with this case.

4 THE WITNESS: That's not my decision to make.

5 BY MR. DePERNO:

6 Q. Have you discussed with them their potential removal?

7 A. Not that I'm aware of. I mean, possibly.

8 THE WITNESS: Charley, I want to remove you. There,
9 I just discussed it. Pass it on to Kelly.

10 BY MR. DePERNO:

11 Q. When did you start using Basecamp as a communication tool?

12 A. I don't think I've ever used Basecamp as a communication tool.

13 Q. Are you communicating with the state chairperson regarding the
14 KGOP situation?

15 MR. THOMAS: Again, the state chair, Karamo, is that
16 who you're talking about?

17 MR. DePERNO: I think she's the state chairperson,
18 isn't she?

19 MR. THOMAS: Well, you need to say it on the record.
20 So you're asking him if he's having communications about
21 removing --

22 BY MR. DePERNO:

23 Q. Are you communicating with the state chairperson regarding the
24 KGOP situation, this case?

25 A. No, no. They've got a conflicts resolution committee that

1 handles that.

2 Q. Is that up and running? I was not aware it was actually
3 operating.

4 A. Well, that's who I communicate with.

5 Q. Who is that?

6 A. The conflicts resolution. I don't know. I send my stuff to
7 Malinda Pego.

8 (Clarification by Reporter.)

9 THE WITNESS: Malinda Pego is who I would send any
10 type of communications with.

11 BY MR. DePERNO:

12 Q. Did you discuss this case this last weekend at the state
13 committee meeting with Dan Hartman?

14 A. No.

15 (Exhibit 7 marked for identification.)

16 BY MR. DePERNO:

17 Q. Exhibit 7 is a flyer that was handed out at one of your
18 District 4 committee meetings. Do you recognize it?

19 A. Nope. What District 4 committee meeting was this handed out
20 at?

21 Q. I don't know exactly which one. I think two meetings ago.

22 A. I don't -- I've never seen it before.

23 Q. So as the District 4 chair, you're not aware that this type of
24 stuff is being handed out --

25 A. Unless you can tell me when specifically it was handed out --

1 MR. THOMAS: Was it maybe one of your people that
2 handed it out there?

3 THE WITNESS: Yeah. This was not anything that I've
4 seen handed out officially from any District 4 meeting. I've
5 never even seen this.

6 BY MR. DePERNO:

7 Q. Do you believe county political parties are free to constitute
8 their own rules without interference?

9 A. I'm sorry. I wasn't paying attention.

10 Q. Do you believe that county parties are free to constitute
11 their own rules without interference?

12 A. If they go along with the state laws.

13 Q. So in other words, state law interference is okay?

14 A. If it -- I mean, isn't that what the rules say? Doesn't
15 everything have to go -- you can't go against state law.

16 Q. This is the problem, Ken. The answer -- if you're asking me
17 that question, it's no, you don't have to go along with state
18 law. This is the problem.

19 MR. THOMAS: Unless you invoke it in the bylaws,
20 which is invoked in the KGOP bylaws.

21 THE WITNESS: If it says in the bylaws that you need
22 to follow state law, then you have to follow state law.

23 MR. THOMAS: We've got a judge getting ready to make
24 a ruling on this stuff, so --
25

1 BY MR. DePERNO:

2 Q. Do you think the Democrat controlled legislature in Michigan
3 can pass laws that require the Republican county parties to
4 follow parameters that they set forth? You believe that?

5 A. No, I don't believe that.

6 Q. But you just said when I asked, "Are political parties free to
7 constitute their own rules without interference," you said,
8 "Yes, but they have to follow state law." So Democrats can
9 set the policy for county Republican parties, correct?

10 MR. THOMAS: Object. It's so out of context.

11 BY MR. DePERNO:

12 Q. Correct?

13 A. I'm not a lawyer, so I don't know how to answer that.

14 Q. Do you agree that county political parties have a right to
15 control their membership?

16 A. Their membership?

17 Q. Yeah.

18 A. I would assume so.

19 Q. If Democrats or third-party people infiltrate a county party,
20 can the county chair then remove them?

21 A. The county chair? Absolutely not. It should be the body and
22 you should have a hearing and there should be, you know,
23 evidence and you just can't -- I mean, I heard you call me a
24 Democrat.

25 Q. Well, I said you donated to Democrats.

1 A. No. You said I was a Democrat --

2 Q. Because you donated to Democrats.

3 A. -- in a cultist plan that's here to destroy the Republican
4 party if I remember the conversations you were having with
5 everybody.

6 Q. I don't think I said that about you.

7 MR. THOMAS: Is that a question?

8 BY MR. DePERNO:

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

12 MR. THOMAS: What's the question? Re-read the
13 question.

14 BY MR. DePERNO:

15 Q. These are simple questions.

16 MR. THOMAS: Re-read it.

17 BY MR. DePERNO:

18 Q. Do you think the county party has a right to punish or
19 discipline people who act against the interest of the county
20 party?

21 A. County party's opinion, their bylaws? I mean, this is a very
22 vague question.

23 Q. No. It's the interest of the county party.

24 A. The interest of the county party based on whose interest? The
25 chair's or the delegates or the EC? You know, whose opinion

1 are you going on?

2 Q. Leadership within the county party. Let's put it at that.

3 A. Leadership within the Kalamazoo party, no. I don't think that

4 they have the -- no.

5 Q. So -- okay. Were you at Kim Harris's Juliana restaurant

6 precinct delegate meeting after the state convention in

7 February of 2023?

8 A. I could have been. I don't know the date.

9 Q. Did you hear anyone state that they were upset about the

10 February 17th caucus, people from Kalamazoo, who stated that

11 their vote was stolen?

12 A. No.

13 Q. Have you signed an affidavit as others have acknowledging that

14 the set-aside motion on February 17th to set aside Rule 9 was

15 a mistake?

16 A. Run that one by me again.

17 Q. Have you signed an affidavit as others have acknowledging that

18 the set-aside motion to set aside Rule 9 was a mistake?

19 A. No.

20 Q. Have you offered to redo the February 17th caucus?

21 A. No.

22 Q. Does it concern you that you have a body of people in

23 Kalamazoo County who feel like their vote was stolen on

24 February 17th?

25 A. It's Kelly, him --

1 Q. Does it concern you?

2 A. -- and a few other people. It concerns me that they are
3 having -- creating such division, that concerns me is the
4 division that they have. They're not just going, "Hey, we've
5 got representatives," you know, "We've got people that" -- you
6 know, "part of Kalamazoo and moving on." So it concerns me
7 that people are still five months later still not conceding.
8 Still doing what you're doing.

9 I mean, basically what this boils down to is you
10 haven't conceded and neither have they. So it's, like, you
11 know, we won, we've had more numbers than what you had, and we
12 ran a good campaign and we won.

13 Q. And, likewise, Kalamazoo County Executive Committee had more
14 numbers to vote Kim Harris off the Executive Committee and to
15 remove --

16 MR. THOMAS: Objection.

17 BY MR. DePERNO:

18 Q. -- Sabrina and Kim Harris as delegates, correct?

19 MR. THOMAS: Objection. It's a misstatement because
20 you didn't have a quorum of the elected members which need to
21 be 12. They voted with 11 and Kelly Sackett voted in that as
22 the 12th member. So, again, wrong.

23 MR. DePERNO: I disagree with your complete
24 analysis.

25 MR. THOMAS: I don't care if you disagree. That's

1 fine.

2 MR. DePERNO: Coming from someone who says they've
3 never actually attended an Executive Committee meeting.

4 BY MR. DePERNO:

5 Q. So you didn't answer that last question I posed.

6 A. I did answer it.

7 Q. How did you answer it? I didn't hear your answer.

8 THE WITNESS: Can you read it back?

9 (Question read back by Reporter.)

10 THE WITNESS: Can you read the question again?

11 BY MR. DePERNO:

12 Q. I said likewise, the Kalamazoo County Executive Committee had
13 more numbers to remove Kim Harris from the Executive Committee
14 and remove Kim Harris and Sabrina Pritchett-Evans and others
15 as precinct delegates, correct?

16 A. And there was a quorum?

17 Q. Yes, there was a quorum.

18 A. How many was in the quorum?

19 Q. There was a quorum. I don't know the number. It's in the
20 minutes.

21 A. The numbers -- well, then give me the minutes and I'll be able
22 to answer that. You're asking me to speculate and I'm not
23 going to do that.

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

25 A. Well, that's not a simple question. You can call it simple,

1 but it's a snake-in-the-grass question that you're trying to
2 make me answer without giving me the specifics on it, which
3 would be the minutes. How many people were there and who
4 actually voted and did Kelly make an illegal vote at that
5 point? Because I believe the chair was only supposed to vote
6 for a tie-breaker, correct?

7 Q. Correct.

8 A. Yeah.

9 Q. Which there was a tie-breaker.

10 A. Was there? Okay. A tie-breaker out of what? Out of what
11 numbers?

12 Q. I don't remember the numbers, but she was the voice -- she was
13 the vote to break the tie, which she's allowed to do, which
14 therefore established a quorum.

15 A. So a tie on what? What was the number that they had?
16 Two-thirds? What was she breaking the tie on?

17 Q. Yeah, she was breaking a vote on two-thirds. Yes.

18 A. And that's --

19 MR. THOMAS: That's the whole point. There wasn't a
20 quorum because there was only 11 people. So there wasn't
21 12 --

22 (Overlapping discussion.)

23 THE WITNESS: Yeah, so you didn't have a quorum.

24 MR. THOMAS: You can't add a statutory member to
25 make a quorum to make 12.

1 MR. DePERNO: Okay. The objection coming from
2 someone again who's admitted in court he never attended an
3 Executive Committee meeting.

4 MR. THOMAS: What's that got to do with anything?

5 THE WITNESS: Well, you seem like a witness actually
6 being a lawyer.

7 MR. THOMAS: What does me not being a part of an EC
8 have anything to do with this? I certainly would tell you
9 that I would run it a lot better than what's going on with you
10 guys, that's for sure.

11 BY MR. DePERNO:

12 Q. Do you believe that people's religious views have been
13 squashed in Kalamazoo County?

14 A. I wouldn't know. I'm not from Kalamazoo County. I believe
15 your rhetoric in calling us a Christian cult is an attempt to
16 quash us or quash anybody that has a religious view or an
17 opinion.

18 Q. Are you trying to intimidate anyone by holding your meeting on
19 July 20th when you know that the court is in session that
20 morning?

21 A. No. I wasn't even aware. Court's being held the 20th?

22 Q. Correct.

23 A. No.

24 Q. So it seems like your notice was an attempt to intimidate by
25 holding your meeting on the evening of the 20th?

1 MR. THOMAS: Objection. That's not a question and
2 he's already asked and answered. He said he didn't know there
3 was even a court date on the 20th.

4 THE WITNESS: As somebody that has a complaint
5 levied against you by the bar for that exact practice, I
6 understand why you're asking it.

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

8 (Deposition concluded at 1:50 p.m.)

9 * * *

CERTIFICATE

STATE OF MICHIGAN)
)
COUNTY OF KENT)

I, REBECCA S. RENZEMA, Certified Shorthand Reporter
and Notary Public, do hereby certify that the foregoing video-
conferencing deposition was taken before me at the time and
date hereinbefore set forth.

I FURTHER CERTIFY that this deposition was taken in
shorthand and thereafter transcribed by me and that it is a
true and accurate transcript, to the best of my ability.

IN WITNESS WHEREOF, I have hereunto set my hand this
26th day of August 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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