

## NOTICE OF MEETING

Please be advised you are requested to attend a summit to discuss issues related to the following topics:

- The lawsuit filed by Sandra Pritchard Evans and Kim Harris against the Kalamazoo Republican Party and Kelly Sackett.
  - Removal of members from the Executive Committee
  - Removal of delegates from the County Party
  - Pending Defamation
- The issues related to 4<sup>th</sup> District Convention in 2/23
  - Rule 9
- The call for a county convention on 9/15/23
- Any other issue of conflict between the parties.

Invited Attendees:

### Kalamazoo County

Matt Deperno-Attorney

Kelly Sackett

One additional member of the Kalamazoo Executive Committee

### Plaintiffs

James Thomas-Attorney

Sabrina Pritchard-Evans

Kim Harris

### 4<sup>th</sup> District

Greg Todd-Attorney

Ken Beyer

Joel Studebaker

### MIGOP

Kristina Karamo

Malinda Pego

James Copas

Braden Giacobazzi- Conflict Chair (or his designee)

Andy Sebolt- Policy Chair (or his designee)

Ralph Rebrandt (Parliamentarian)

The rules of the meeting will be as follows:

Dan Hartman will run the meeting as a mediation (I will be acting as an attorney-mediator). Please review MCR 2.412 related to the limits of disclosure and confidentiality of mediation.

<https://casetext.com/rule/michigan-court-rules/michigan-court-rules/chapter-2-michigan-rules-of-civil-procedure/subchapter-2400-pretrial-procedure-alternative-dispute-resolution-offers-of-judgment-settlements/rule-2412-mediation-communications-confidentiality-and-disclosure>

A second component is that the matter will be heard by Kristina Karamo simultaneously as a non-binding arbitrator. She will receive input and advice from the identified members of MIGOP leadership.

**Attendees:**

Kelly Sackett and Matt Deperno will have the right to bring anyone they chose as a participant from the Kalamazoo Party EC. Two additional observers are permitted by Kalamazoo GOP but will be governed by MCR 2.412.

No additional participants will be permitted by Plaintiffs or the 4<sup>th</sup> District however each may bring an additional observer.

All attendees must be identified by Tuesday, September 5, before 5 pm and must be a delegate of the Michigan Republican party or a bar admitted attorney.

Braden and Andy may invite all or part of their committees as observers. Any vice chairs may attend. All members of the MIGOP will observe the proceedings and be available to consult privately with the mediators to present questions BUT will not be allowed to participate in the discussion with the parties. All persons attending, including those of MIGOP, will be bound by MCR 2.412 as participants in the mediation. As there is a pending lawsuit each participant will have legal counsel present.

The mediator will meet with the participants (along with their designated observers, if any) collectively and individually. The format will be that an initial caucus will take place with each side. After which a group meeting will be held in which Dan Hartman will summarize the identified issues that are in contention. A led discussion will take place that will permit each side to discuss both the history of the problems and possible solutions. All sides will have the opportunity to resolve the differences, but no side will be forced to participate or settle the case. In the event, that part or all issues can be resolved they will be reduced to writing.

In the event the matter is unresolved then Kristina Karamo, Malinda Pego, Andy Sebolt, James Copas and Braden Giacobazzi will meet to make a recommendation on how to proceed from MIGOP as an internal party matter which will be scheduled prior to Saturday, September 9 at 8 PM. Kristina will issue her decision which will include her summary of the positions on the contested issues before Sunday September 10, at 8 pm. Failure to participate or participation in an unprofessional manner will be considered in a final decision. If either side wishes to object to all or part of the chair's decision, then they may do so by requesting in writing to Kristina and Dan Hartman prior to Monday, September 11, at 8 pm. In the event of objection then the written decision will be presented sent to all the state committee members by email on September 12, 2023, informing them that the matter will be scheduled to be voted on at the regularly scheduled state committee meeting at Mackinac Island on September 24, 2023, in the form of a resolution.

Kalamazoo is requested to be prepared to discuss the removal of delegates on an individual basis as discussed with Matthew Deperno. Each side should be prepared to request relief.

Please be advised that the 4<sup>th</sup> District call to county convention on September 15, 2023, will likely continue absent a settlement but the effect of such convention, if it occurs, will be determined at the Mackinac Island State Committee by majority vote. The validity of any such convention will be opined on in the decision of Chair Karamo.

The duration of the summit is limited to four (4) hours unless extended by mutual agreement and in the opinion of the mediator that progress is being made toward resolution.

The lawsuit opinion has been reviewed by Dan Hartman in preparation, as well as Robert's Rules of Order, the Michigan State Committee Bylaws, the Kalamazoo County Bylaws, the *Heitmanis* decision. In addition, Dan Hartman has had consultations with RNC legal and completed other legal research. Finally, Dan Hartman has conducted research regarding conflict resolution provisions in all nearly all 50 state bylaws. This process of resolution is designed to provide a fair opportunity to settle any issues considering where the matter currently is positioned.

Let us all work toward a resolution.

Thank you for your time and attention to this matter.

**Daniel J. Hartman**  
MRP General Counsel  
[Dan@migop.org](mailto:Dan@migop.org)