# Exhibit 15

# **Tyranny Unmasked**

1 message

Kzoodelegates < kzoodelegates@gmail.com>

Sat, Sep 16, 2023 at 5:34 PM

To: Kzoodelegates <kzoodelegates@gmail.com>

Bcc: matthew@depernolaw.com

Below is an updated link for the video shown at the Special Convention. The link sent earlier has expired.

Tyranny Unmasked in Kalamazoo, MI (rumble.com)

God Bless,

**Kzoo Delegates** 

# Exhibit 16

# **Special Message from Chair**

1 message

**Kzoodelegates** <kzoodelegates@gmail.com>

Mon, Sep 18, 2023 at 8:41 PM

To: Kzoodelegates <kzoodelegates@gmail.com>

Bcc: matthew@depernolaw.com

To: Kalamazoo County Precinct Delegates,

My name is Rod Halcomb and on Friday night, September 15, 2023, I was elected to be the Chairperson of the New Kalamazoo County Republican Executive Committee.

September 15, 2023 a special convention was held to determine whether or not to replace the current Kalamazoo County Republican Executive Committee.

The purpose of the convention was to have the delegates vote to either keep or replace the current Kalamazoo County Republican Executive Committee. A total of 73 precinct delegates attended. The vote was an overwhelming "Yes" to replace the current Kalamazoo County Republican Executive Committee.

There were: 69 "Ayes" 1 "Nay" 2 "Present"

One precinct delegate arrived after the replacement vote.

At the special convention the assembly voted to recognize the 18 duly elected precinct delegates that were removed. They are in fact delegates in good standing.

After the replacement vote passed the next order of business was to elect a new Kalamazoo County Republican Executive Committee. Eighteen precinct delegates were elected to the new Kalamazoo County Republican Executive Committee to "represent" you.

The new Kalamazoo County Republican Executive Committee is here to represent you! Your voices will be heard without retribution or condemnation.

If you have a concern or recommendation, please feel free to bring it to our attention.

The new executive committee believes we should work in conjunction with District 4 and the State of Michigan Republican Party. Synergy with other like minded patriots like District 4 and the MRP is our strength! Declaring to be a standalone organization is a weakness.

Attached are the minutes from the Special Convention for your review. We believe in transparency. Also attached is a page comparing the former executive committee to the new executive committee illustrating the huge difference between the two.

We represent ALL of you, not just those that agree with us.

Rod Halcomb

# Chair Kalamazoo County Republican Executive Committee

#### 2 attachments



Special Convention Minutes 9.15.23 (1).docx 24K



CURRENT vs NEW Executive Committee 3 (1).pdf

FORMER Executive Committee	NEW Executive Committee
Chairperson attempted to remove 17 Precinct Delegates unilaterally	New leadership won't exclude or expel people because they have a different point of view.
Chairperson cast an improper vote to consider removal of 3 Executive Committee members Improper vote violating both KGOP bylaws and Robert Rules of Order	New Executive committee will follow the bylaws, MRP rules and Robert Rules of Order
Chairperson violated KGOP bylaws by attempting to remove an ex-officio Executive Committee member	New Executive committee will follow the bylaws, MRP rules and Robert Rules of Order
KGOP doesn't Support the MRP and its officers by saying they will not be attending the Mackinac Republican Conference	New Executive committee believes in supporting the Republican Party as a whole, not pick and choose
Threatening to fine the MRP if they criticize KGOP operations and/or conduct	People are entitled to have differing opinions and we believe in open discussions
Banning people from the KGOP for 6 years for supporting an alternate Republican candidate the KGOP doesn't endorse	There will be no Banning of delegates
Banning people from the KGOP for 10 years who the Chairperson improperly kicked out of the KGOP	There will be no Banning of delegates
Mandatory membership in the KGOP if you want to serve your community as a Precinct Delegate	We hope and anticipate people will want to become members to support conservative ideas, but it will not be mandatory
Precinct Delegates serve at the PLEASURE of the KGOP Executive Committee	Precinct delegates DO NOT serve at the pleasure of the executive committee, the executive committee represents the Precinct Delegates they are NOT their rulers
Precinct Delegates can be "removed from such position for any reason."	Bylaws, MCL, MRP rules and Robert Rules of Order will be followed if an issue arises
Has declared themselves as an "autonomous self- governing private political organization." (Otherwise known as a club?)	The NEW executive committee will work with the district and state republican party to forward conservative ideas and values

# SPECIAL CONVENTION OF THE KALAMAZOO COUNTY REPUBPICAN PRECINCT DELEGATES

#### Call to Order

At 6:30 convention was called to order by RJ Breganzer

#### **Attendees**

Voting members in attendance included Precinct Delegates from Districts 4 and 5

# National Anthem, Invocation, Pledge of Allegiance, Welcome Introduction and Appointment of Temporary Secretary – Emily Crawford

Read Call to Convention

- MOTION Have on record the 18 duly elected precinct delegates that were removed are in fact delegates in good standing.
  - o Lori Malakowski, 2<sup>nd</sup> multiple delegates
  - o Motion carried without objection.

#### **Credentials Committee Report**

Cedential Committee presented 70 voting delegates have checked in

- MOTION To accept delegates to constitute a quorum
  - o Kim Harris, 2<sup>nd</sup> multiple delegates
  - o Motion carried without objection

## **Appointment of Temporary Officers**

Temporary Parliamentarian: Ralph Rebandt

Temporary Sargent at Arms: Vincent Wilson

Temporary Tellers: Kelly Cox, Dan Hoffman, Gail Koporetz, Paul Seals, Sarah LaSota

## **Rules Report**

- MOTION: To amend rules part 4 to reflect the same as the call to convention.
  - Sabrina Pritchett-Evans, 2<sup>nd</sup> multiple present
  - o Motion carried without objection.
- MOTION: To waive the reading of the rules
  - o Gary Mitchell, 2<sup>nd</sup> multiple delegates
  - Motion carried without objection

## **Agenda Approval**

- MOTION: To approve agenda
  - o Megan Haan, 2<sup>nd</sup> multiple present
  - Motion carried without objection

#### **Election of Permanent Chair**

Sandra Vanderlugt nominated Rod Halcomb for permanent chair. Multiple seconds. No additional nominations

Roll Call Vote Rod Halcomb – 69 votes Dale Sugars – 1

#### **Appointment of Permanent Officers**

Secretary: Emily Crawford

Parliamentarian: Ralph Rebandt Sargent at Arms: Vincent Wilson

Tellers: Kelly Cox, Dan Hoffman, Gail Koporetz, Paul Seals, Sarah LaSota

Organization Committee Chair: Kerry Lynn Elieff

Credentials Committee Chair: Kim Harris

No objection

- MOTION to view video.
  - Sabrina Pritchett-Evans
  - o body agreed to view per common consent.

#### **Vote to Replace Current Executive Committee**

- MOTION to replace current delegate elected executive committee members.
  - o David Stevens, 2<sup>nd</sup> multiple delegates
  - Vote conducted by secret ballot.
  - AYES: 69 NAYS: 1 PRESENT: 2 Motion carried

#### **Vote to Elect New Executive Committee**

- MOTION: Randomize Selection List
  - Kathy Stoll, 2<sup>nd</sup> Dennis Kehoe
  - Motion failed
- MOTION: Change rules to a ballot vote
  - o Todd White, 2<sup>nd</sup> multiple delegates
  - o Motion failed did not reach 2/3 required.
- MOTION: Allow each candidate 1 minute to speak, if they wish to
  - o Bruce Lenardson, no second
  - Motion failed as there was no second.
- MOTION: Move all 22 nominated candidates onto EC
  - Kerry Lynn Elieff
  - Motion ruled out of order, as only 18 are allowed at this time, per bylaws.
- POINT OF INQUIRY Can we vote for more than 18 candidates
  - Chair clarified they should only be voting for 18 candidates.
  - Chair asked body to if they wanted to re-start vote or change their vote with this
    information and suggested they would entertain a motion to this effect. No motion made.

Candidates	Total Votes
Ruth Berjawi	68
Sabrina Pritchett-Evans	68
Rod Halcomb	68
Gary Mitchell	67
David Stevens	66
David Harris	66
Kim Harris	66
Mark Chilcott	65
Dennis Kehoe	65
Kerry Lynn Elieff	64
Megan Haan	64
Vincent Wilson	63
Emily Crawford	63
Robyn Maxson	62
Rene Saar	62
Sandra Vanderlaugt	60
Todd White	59
John Elieff	58
Sandy Bloomfield	57
Lori Malakowski	50
Jerry Amos	47
Pamela Herbert	43
Brian Kincade	14

## MOTION – Read and approve the minutes –

- o Kerry Lynn Elieff, 2<sup>nd</sup> Sandy Bloomfield
- o Carried Unopposed.
- AMENDMENT MOVED update count of credentialed delegates to 73.
  - $\circ$  Kim Harris,  $2^{nd}$  multiple delegates
  - o Motion Carried without objection.

## **Vote to Approve Minutes**

- MOTION to accept agenda as necessary
  - o Sabrina Pritchett-Evans, 2<sup>nd</sup> multiple delegates
  - o Motion carried.
- MOTION to adjourn the meeting
  - o Sabrina Pritchett-Evans, 2<sup>nd</sup> multiple delegates
  - Motion carried

# Exhibit 17



Angela Palomaki 708 N Boulevard St Vicksburg, Michigan 49097

RE: Membership Status

Dear Angela Palomaki,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Ann Brissette 2656 Orange Meadow Ln Kalamazoo, Michigan 49004

RE: Membership Status

Dear Ann Brissette,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Bruce Lenardson 7534 Farmington Ave Kalamazoo, Michigan 49009

RE: Membership Status

Dear Bruce Lenardson,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



C.James Mallinson 1311 Manor St Kalamazoo, Michigan 49006

RE: Membership Status

Dear C.James Mallinson,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Christian Chojnowski 11243 Delmar Richland, Michigan 49083

RE: Membership Status

Dear Christian Chojnowski,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

**KGOP** Chairwoman

Kathleen Olmsted



Cindy Little 525 Grand Pre Ave Kalamazoo, Michigan 49006

RE: Membership Status

Dear Cindy Little,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Dana Craft 7757 Bowers Harbor Ave Kalamazoo, Michigan 49009

RE: Membership Status

Dear Dana Craft,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Dana Hatfield 6039 Danford Creek Dr Apt 1 Kalamazoo, Michigan 49009

RE: Membership Status

Dear Dana Hatfield,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Daniel Hoffman 6841 Evergreen St Portage, Michigan 49024

RE: Membership Status

Dear Daniel Hoffman,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



David Stevens 6224 Avon St Portage, Michigan 49024

RE: Membership Status

Dear David Stevens,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Debra Thompson-Smith 4040 Greenleaf Cir Apt 211 Kalamazoo, Michigan 49008

RE: Membership Status

Dear Debra Thompson-Smith,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Dennis Kehoe 11806 Heron St Schoolcraft, Michigan 49087

RE: Membership Status

Dear Dennis Kehoe,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Gail Koporetz 8736 E D Ave Richland, Michigan 49083

RE: Membership Status

Dear Gail Koporetz,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Gary Mitchell 2977 Hickory Nut Ln Kalamazoo, Michigan 49004

RE: Membership Status

Dear Gary Mitchell,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



George Beuckelaere 1903 Lakeway Ave Kalamazoo, Michigan 49001

RE: Membership Status

Dear George Beuckelaere,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Heather Triqueros 1548 Notley Field Ln Vicksburg, Michigan 49097

RE: Membership Status

Dear Heather Triqueros,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



James Bloomfield Jr 2304 W Gleneagle Dr Kalamazoo, Michigan 49048

RE: Membership Status

Dear James Bloomfield Jr,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

**KGOP** Chairwoman

Kathleen Olmsted



James Mitchell 2513 Outlook St Kalamazoo, Michigan 49001

RE: Membership Status

Dear James Mitchell,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Jamie Calder 4044 Ivy St Galesburg, Michigan 49053

RE: Membership Status

Dear Jamie Calder,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Jeremy Smith 4040 Greenleaf Cir Apt 211 Kalamazoo, Michigan 49008

RE: Membership Status

Dear Jeremy Smith,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Joshua Losota 6867 Jr Dr Kalamazoo, Michigan 49009

RE: Membership Status

Dear Joshua Losota,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Julie Henderson 1304 Lakeway Ave Kalamazoo, Michigan 49001

RE: Membership Status

Dear Julie Henderson,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Julie Pieper 3580 W C Ave Kalamazoo, Michigan 49009

RE: Membership Status

Dear Julie Pieper,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Kathy Stoll 2656 Orange Meadow Ln Kalamazoo, Michigan 49004

RE: Membership Status

Dear Kathy Stoll,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Kelly Cox 7031 N 32Nd St Richland, Michigan 49083

RE: Membership Status

Dear Kelly Cox,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Kevin Little 6433 Old Log Trl Kalamazoo, Michigan 49009

RE: Membership Status

Dear Kevin Little,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Kurt Calder 4044 Ivy St Galesburg, Michigan 49053

RE: Membership Status

Dear Kurt Calder,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

**KGOP Chairwoman** 

Kathleen Olmsted



Lorraine Malackowski 8031 W U Ave Schoolcraft, Michigan 49087

RE: Membership Status

Dear Lorraine Malackowski,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

**KGOP Chairwoman** 

Kathleen Olmsted



Manfred Martin 1622 Plumtree Ave Portage, Michigan 49002

RE: Membership Status

Dear Manfred Martin,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

**KGOP Chairwoman** 

Kathleen Olmsted



Mark Chilcott 6909 Crest Point Ct Portage, Michigan 49024

RE: Membership Status

Dear Mark Chilcott,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

**KGOP Chairwoman** 

Kathleen Olmsted



Megan Haan 8574 Doe Ave Galesburg, Michigan 49053

RE: Membership Status

Dear Megan Haan,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

**KGOP** Chairwoman

Kathleen Olmsted



Melvin Reeves 504 Keyes Dr Parchment, Michigan 49004

RE: Membership Status

Dear Melvin Reeves,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Pamela Herbert 6717 S 30Th St Kalamazoo, Michigan 49048

RE: Membership Status

Dear Pamela Herbert,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Patricia Doran 12346 N Sherman Lake Dr Augusta, Michigan 49012

RE: Membership Status

Dear Patricia Doran,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Paul Seals 5829 Vista Rdg Kalamazoo, Michigan 49009

RE: Membership Status

Dear Paul Seals,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

**KGOP** Chairwoman

Kathleen Olmsted



Paula Hochstetler 12867 S 36Th St Vicksburg, Michigan 49097

RE: Membership Status

Dear Paula Hochstetler,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Rebecca Larsen 6209 Winddrift Ave Kalamazoo, Michigan 49009

RE: Membership Status

Dear Rebecca Larsen,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Robert Heuermann 7534 Yorktown Richland, Michigan 49083

RE: Membership Status

Dear Robert Heuermann,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Rodney Halcomb 10715 S S Ave E Scotts, Michigan 49088

RE: Membership Status

Dear Rodney Halcomb,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

**KGOP** Chairwoman

Kathleen Olmsted



Ruth Berjawi 717 Chalfonte Ave Portage, Michigan 49024

RE: Membership Status

Dear Ruth Berjawi,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Sandra Bloomfield 2304 W Gleneagle Dr Kalamazoo, Michigan 49048

RE: Membership Status

Dear Sandra Bloomfield,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Sarah Gage 10301 Terry Ln Portage, Michigan 49002

RE: Membership Status

Dear Sarah Gage,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Sarah Losota 6867 Jr Dr Kalamazoo, Michigan 49009

RE: Membership Status

Dear Sarah Losota,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Shelby Crouse 10172 W Kl Ave Kalamazoo, Michigan 49009

RE: Membership Status

Dear Shelby Crouse,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Shelby Nowak 5902 Baywood Dr Portage, Michigan 49024

RE: Membership Status

Dear Shelby Nowak,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Shelly Misak 10743 Callaway Ave Kalamazoo, Michigan 49009

RE: Membership Status

Dear Shelly Misak,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Taukir Gill 1960 Shuring Rd. Portage, Michigan 49204

RE: Membership Status

Dear Taukir Gill,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Theresa Devries 8888 Mountain Pine Ln Kalamazoo, Michigan 49009

RE: Membership Status

Dear Theresa Devries,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Thomas Little 525 Grand Pre Ave Kalamazoo, Michigan 49006

RE: Membership Status

Dear Thomas Little,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (https://kgop.org/?page\_id=1918).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



Veronica Carra 6313 Trotwood St Portage, Michigan 49024

RE: Membership Status

Dear Veronica Carra,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted



William Hochstetler 12867 S 36Th St Vicksburg, Michigan 49097

RE: Membership Status

Dear William Hochstetler,

This letter is to notify you that your membership with the Kalamazoo County Republican Committee (KGOP) has been revoked in accordance with Section 4.3. of the KGOP Bylaws (<a href="https://kgop.org/?page\_id=1918">https://kgop.org/?page\_id=1918</a>).

If you wish to appeal this decision, you may contact the Secretary at <a href="mailto:secretary@kgop.us">secretary@kgop.us</a>.

Sincerely,

Kelly Sackett

KGOP Chairwoman

Kathleen Olmsted

# Exhibit 18

To: Kristina Karamo, Former Chair of the Michigan Republican Party

From: Malinda Pego, Acting Chair of the Michigan Republican Party

Re: Notice of Removal, Cease and Desist and Return of Property

Dear Ms. Karamo,

## 1. Notice of Removal

Effective immediately, you have been removed from the position of Chair of the Michigan Republican Party pursuant to a properly noticed Special Meeting of the Michigan Republican State Committee.

#### 2. Cease and Desist

You are to Cease and Desist any and all activities related to your former position of Chair of the Michigan Republican Party. You no longer have authority to represent the Michigan Republican Party in any capacity, in any forum, nor do you have signatory authority as to any document or financial matter.

# 3. Return of Property

Please deliver all Michigan Republican Party materials, including but not limited to documents, all keys to the office located at 101 S. Washington Square, Lansing, MI 48933, the keys to the MRP post office box, all bank account information including passwords and usernames, all MRP credit cards, usernames and passwords for the MRP website and social media accounts, electronic devices (including phones, laptops or tablets), equipment or any other property purchased with MRP funds to me **before 5:00 PM on Monday, January 8, 2024.** 

If you have any further questions, please contact me.

Sincerely,

Malinda Pego

Acting Chair, Michigan Republican Party

(231) 286-6240

To: Daniel J. Hartman, Former Legal Counsel of the Michigan Republican Party

From: Malinda Pego, Acting Chair of the Michigan Republican Party

Re: Notice of Removal, Cease and Desist and Return of Property

Dear Mr. Hartman,

## 1. Notice of Removal

Effective immediately, you have been removed from the position of General Counsel of the Michigan Republican Party pursuant to a properly noticed Special Meeting of the Michigan Republican State Committee.

#### 2. Cease and Desist

You are to Cease and Desist any and all activities related to your former position of General Counsel of the Michigan Republican Party. You no longer have authority to represent the Michigan Republican Party, the Michigan Republican State Committee or any committee, subcommittee, employee, or otherwise on any legal matter, in any forum, nor do you have signatory authority as to any document or financial matter.

# 3. Return of Property

Please deliver all Michigan Republican Party materials, including but not limited to documents, legal files, all keys to the office located at 101 S. Washington Square, Lansing, MI 48933, the keys to the MRP post office box, all bank account information including passwords and usernames, all MRP credit cards, usernames and passwords for the MRP website and social media accounts, electronic devices (including phones, laptops or tablets), equipment or any other property purchased with MRP funds to me **before 5:00 PM on Monday, January 8, 2024.** 

If you have any further questions, please contact me.

Sincerely,

Malinda Pego

Acting Chair, Michigan Republican Party

(231) 286-6240

To: James Michael Copas, Former Executive Director of the Michigan Republican Party

From: Malinda Pego, Acting Chair of the Michigan Republican Party

Re: Notice of Termination, Cease and Desist and Return of Property

Dear Mr. Copas,

# 1. Notice of Termination

Effective immediately, you have been terminated from the position of Executive Director of the Michigan Republican Party pursuant to my authority and as directed by the Michigan Republican State Committee.

#### 2. Cease and Desist

You are to Cease and Desist any and all activities related to your former position of Executive Director of the Michigan Republican Party. You no longer have authority to represent the Michigan Republican Party, the Michigan Republican State Committee or any committee, subcommittee, employee, in any capacity, in any forum, nor do you have signatory authority as to any document or financial matter. You are prohibited from using or copying MRP data, email lists, donor lists, or precinct delegate lists or any other property of MRP, whether intellectual, tangible or intangible.

# 3. Return of Property

Please deliver all Michigan Republican Party materials, including but not limited to documents, files, all keys to the office located at 101 S. Washington Square, Lansing, MI 48933, the keys to the MRP post office box, all bank account information including passwords and usernames, all MRP credit cards, usernames and passwords for the MRP website and social media accounts, electronic devices (including phones, laptops or tablets), equipment or any other property purchased with MRP funds to me **before 5:00 PM on Monday, January 8, 2024.** 

If you have any further questions, please contact me.

Sincerely,

Malinda Pego

Acting Chair, Michigan Republican Party

(231) 286-6240

January 6, 2024

To: Lori Skibo, Chief of Staff for the Michigan Republican Party

From: Malinda Pego, Acting Chair of the Michigan Republican Party

Re: Notice of Termination, Cease and Desist and Return of Property

Dear Mr. Copas,

### 1. Notice of Termination

Effective immediately, you have been terminated from the position of Chief of Staff for the Michigan Republican Party pursuant to my authority and as directed by the Michigan Republican State Committee.

#### 2. Cease and Desist

You are to Cease and Desist any and all activities related to your former position of Executive Director of the Michigan Republican Party. You no longer have authority to represent the Michigan Republican Party, the Michigan Republican State Committee or any committee, subcommittee, employee, in any capacity, in any forum, nor do you have signatory authority as to any document or financial matter. You are prohibited from using or copying MRP data, email lists, donor lists, or precinct delegate lists or any other property of MRP, whether intellectual, tangible or intangible.

# 3. Return of Property

Please deliver all Michigan Republican Party materials, including but not limited to documents, files, all keys to the office located at 101 S. Washington Square, Lansing, MI 48933, the keys to the MRP post office box, all bank account information including passwords and usernames, all MRP credit cards, usernames and passwords for the MRP website and social media accounts, electronic devices (including phones, laptops or tablets), equipment or any other property purchased with MRP funds to me **before 5:00 PM on Monday, January 8, 2024.** 

If you have any further questions, please contact me.

Sincerely,

Malinda Pego

Acting Chair, Michigan Republican Party

(231) 286-6240

To: Joel Studebacker, Former Deputy Chief of Staff for the Michigan Republican Party

From: Malinda Pego, Acting Chair of the Michigan Republican Party

Re: Notice of Termination, Cease and Desist and Return of Property

Dear Mr. Copas,

## 1. Notice of Termination

Effective immediately, you have been terminated from the position of Deputy Chief of Staff for the Michigan Republican Party pursuant to my authority and as directed by the Michigan Republican State Committee.

### 2. Cease and Desist

You are to Cease and Desist any and all activities related to your former position of Executive Director of the Michigan Republican Party. You no longer have authority to represent the Michigan Republican Party, the Michigan Republican State Committee or any committee, subcommittee, employee, in any capacity, in any forum, nor do you have signatory authority as to any document or financial matter. You are prohibited from using or copying MRP data, email lists, donor lists, or precinct delegate lists or any other property of MRP, whether intellectual, tangible or intangible.

# 3. Return of Property

Please deliver all Michigan Republican Party materials, including but not limited to documents, files, all keys to the office located at 101 S. Washington Square, Lansing, MI 48933, the keys to the MRP post office box, all bank account information including passwords and usernames, all MRP credit cards, usernames and passwords for the MRP website and social media accounts, electronic devices (including phones, laptops or tablets), equipment or any other property purchased with MRP funds to me **before 5:00 PM on Monday, January 8, 2024.** 

If you have any further questions, please contact me.

Sincerely,

Malinda Pego

Acting Chair, Michigan Republican Party

(231) 286-6240

To: Robert Morris Owens, Former Associate/Mackinac Fundraiser of the Michigan Republican Party

From: Malinda Pego, Acting Chair of the Michigan Republican Party

Re: Notice of Termination, Cease and Desist and Return of Property

Dear Mr. Owens,

# 1. Notice of Termination

Effective immediately, you have been terminated and all ties to you with respect to the Michigan Republican Party are severed, pursuant to my authority and as directed by the Michigan Republican State Committee.

#### 2. Cease and Desist

You are to Cease and Desist any and all activities related to any position you have had or continue to hold, officially or unofficially, with the Michigan Republican Party. You no longer have authority to represent the Michigan Republican Party, the Michigan Republican State Committee or any committee, subcommittee, employee, policy formation activity or otherwise, in any capacity, in any forum, nor do you have signatory authority as to any document or financial matter.

# 3. Return of Property

Please deliver all Michigan Republican Party materials, including but not limited to documents, files, all keys to the office located at 101 S. Washington Square, Lansing, MI 48933, the keys to the MRP post office box, all bank account information including passwords and usernames, all MRP credit cards, usernames and passwords for the MRP website and social media accounts, electronic devices (including phones, laptops or tablets), equipment or any other property purchased with MRP funds to me **before 5:00 PM on Monday, January 8, 2024.** 

If you have any further questions, please contact me.

Sincerely,

Malinda Pego

Acting Chair, Michigan Republican Party

(231) 286-6240

# Exhibit 19



JANUARY 17<sup>TH</sup>, 2024

# STATEMENT ON STATE INTERVENTION

There are four levels of political committees within the convention of delegates in the Republican Party nationally.

The **DELEGATES** which are the building block of the **REPUBLICAN PARTY** form through conventions a County, a District and a State body.

They also send representatives from all States to the RNC to form the Republican National Committee.

While it's true that these are in fact, four (4) separate political committees, there are not independent of each other as collectively they form **our REPUBLICAN PARTY**.

This creates a delegation through delegated authority. While it is true that the State Committee has a serious duty to protect the will of properly functioning County Committee's or District Committee's, the State Committee also has the duty to address and control any County Committee or District Committee from acting or functioning inappropriately. The County Committee's and District Committee's through the authority of the collective voice at the State Committee govern rogue County or District Committees that harm the interests of the delegates.

We adhere wholeheartedly to the United States Court of Appeals, Sixth Circuit Heitmanis v. Austin 899 F.2d 521 (6th Cir. 1990) Decided Mar 29, 1990, stating that we SHALL MANAGE, DECIDE AND RESOLVE ANY AND ALL MIGOP RELATED DISPUTES INTERNALLY. THE REPUBLICAN PARTY OF MICHIGAN IN THE EXERCISE OF ITS CONSTITUTIONAL RIGHTS OF ASSOCIATION AND SPEECH, RESERVES THE RIGHT TO ACCEPT OR DECLINE THE APPLICATION OF MICHIGAN STATUATORY PROVISIONS, WHICH APPEAR TO GOVERN ITS AFFAIRS.. During our time as General Counsel and Executive Director we have counseled the chair and have taken a non-intervention process as to District and County disputes. This is because the bylaws have not delegated authority to the State to intervene into County and District disputes.

One recent exception was when on motion, the State was required to recognize the convention of delegates from Kalamazoo County who had rescinded the grant of authority to an executive committee and County chairwoman and replace them. We were required to make a formal recognition for purposes of state compliance with campaign finance law under MCL 169 to 11. In addition, the body felt it was inappropriate for the Kalamazoo County executive committee chairwoman to refuse to send invitations to the call of convention to delegates from Kalamazoo County. It is clear that under state law that the state party has the ability/authority to recognize one District and one County as legitimate. This is not the power of the chairwoman but of the State Committee which voted to make this recognition.



We have been asked what happens if a District Chair states that they have an opinion about who is the chairwoman of the Michigan Republican Party. Remember, it is the actual District or County members (delegates) (not just a District chair) who vote in County or District matters and take a resolution in favor of or against such matters as they can determine who they choose to recognize but at the end of the day the State chairwoman has her authority derived from the convention of delegates and the bylaws which provides for the manner in which meetings are called and removal actions proceed. Chair Karamo has not been removed according to these safeguards and controls.

As such, it does not matter what a District Chair determines when he/her shares their personal opinion of such a matter. While the RNC has not expressed an opinion, their opinion would be irrelevant as well because they may choose to state who they recognize by vote of the Republican national committee but a statement by a Chairwoman or Officer of the RNC, <u>TO BE CLEAR</u> has no effect.

FURTHERMORE, THE ONLY FORSEEABLE SITUATIONS THAT WILL TRIGGER DIRECT AND STRICT STATE INTERVENTION INTO COUNTY OR DISTRICT BUSINESS OR AFFAIRS BY MIGOP IS WHEN THE COUNTY COMMITTEE OR DISTRICT COMMITTEE IN QUESTION ENGAGES IN ACTIVITIES THAT COUNTERVIEN, CONFLICT OR ARE REPUGNET TO THE STATE MIGOP CONSTITUTION (IF ONE IS ULTIMATELY AFFIRMED BY THE STATE COMMITTEE AND/OR CONVENTION OF DELEGATES) OR STATE BY-LAWS.

Such controlled restraint is the <u>DUTY</u> of the <u>STATE COMMITTEE</u> and necessary to maintain a consistently well-functioning and productive State Committee and therefore County and District Committees as well.

JÁMÉS M COPAS, JD LLM LLM LLM

**EXECUTIVE DIRECTOR** 

**MIGOP** 

DANIEL J. HARTMAN ESQ.

**GENERAL COUNSEL** 

MIGOP

# Exhibit 20

#### **Big Announcement!**

1 message

**Kzoodelegates** <kzoodelegates@gmail.com>

To: Kzoodelegates <kzoodelegates@gmail.com>

Bcc: matthew@depernolaw.com

Sun, Jan 14, 2024 at 4:08 PM

Dear Delegates of Kalamazoo County,

I am pleased to inform you that January 13, 2024, marked a momentous occasion for our county delegates. The Michigan State Republican Party Central Committee, in a decisive vote, officially recognized the newly elected executive committee, which assumed office on September 15, 2023, as the legitimate executive committee of Kalamazoo County.

As your Chairman, I want to emphasize the following commitments:

- 1. **Representation:** The executive committee now serves as a true representation of you, the delegates. This shift means that your voices and concerns will be at the forefront of decision-making within the committee.
- 2. **Inclusive Participation:** Duly elected precinct delegates are now entitled to participate in party activities without fear of exclusion. This ensures that your role as a delegate is respected, and you can actively engage in the democratic process without hindrance.
- 3. **End of "Pay to Play":** The era of "pay to play" is officially over. As a duly elected precinct delegate, your participation is based on merit and commitment, not financial considerations.

The new leadership of the executive committee is wholeheartedly dedicated to serving your interests and ensuring a fair and inclusive environment within the party.

I invite you to join us at the Official Kalamazoo County Convention, which is scheduled to take place at the Scotts Community Center on February 15, 2024. This convention will provide a platform for collaboration, discussion, and unity among the delegates.

With Sincere Respect,

Rod Halcomb Kalamazoo County Republican Chair

## Exhibit 21



January 16th, 2024

Sent via email <a href="mailto:lovegrovea1@michigan.gov">lovegrovea1@michigan.gov</a>

State of Michigan
Bureau of Elections
Filings, Disclosure & Compliance Division
Disclosure & Compliance Section

Attention: Amy Lovegrove, Manager,

Ms. Lovegrove:

Please be advised that the following individuals are the properly recognized members and leadership of the Kalamazoo County GOP Political Committee as recognized by the Michigan GOP (MIGOP). There are no others such recognized.

The Members of the Leadership and Executive Committee voted in by the delegates at the special convention on September 15, 2023 – Recognized as the official Kalamazoo County Republican Committee at State Committee meeting January 13, 2024

- 1. Rod Halcomb Chair
- 2. Kerry Lynn Elieff Vice Chair
- 3. Emily Crawford Secretary
- 4. Robyn Maxson Treasurer
- 5. Ruth Berjawi
- 6. Dave Stevens
- 7. Mark Chilcott
- 8. Dr. Gary Mitchell
- 9. Sabrina Pritchett-Evans



- 10. Kim Harris
- 11. David Harris
- 12. Dennis Kehoe
- 13. Megan Haan
- 14. Vincent Wilson
- 15. Rene Saar
- 16. Sandra VanderLugt
- 17. John Elieff
- 18. Lori Malokowski
- 19. Pamela Herbert

#### **Statutory Members**

- 1. Kelly Sackett
- 2. Charley Coss
- 3. Jeff Heppler
- 4. John Gisler
- 5. Gary Hahn
- 6. Mary Balkema
- 7. Nicole Sabel
- 8. Pete Strazdas
- 9. Sarah Lightner
- 10. Dr. Tamara Mitchell
- 11. Terry Haines
- 12. Thomas Albert
- 13. Tom Graham
- 14. Wendy Mazer
- 15. Matt Hall

James M Copas, JD, LLM

**Executive Director** 

**MIGOP** 

Daniel J. Hartman, Esq.

**General Counsel** 

**MIGOP** 



Attachment: Jan 13th, Special MIGOP State Committee Meeting Minutes

#### CC:

Township

Richland Township

Ross Township

Jurisdiction Clerk Name Alamo Township Barbara Venema **Brady Township Beverly Wenzlick** Charleston Township Linda Kramer Climax Township Marcia Lewis Comstock Township Nicole Beauchamp Cooper Township DeAnna Janssen City of Galesburg Lisa McNees City of Kalamazoo Scott Borling Meredith Place Kalamazoo County Kalamazoo Township Lisa Mackie Oshtemo Township **Dusty Farmer** City of Parchment **Shannon Stutz** Karen Siegwart **Pavilion Township** City of Portage Erica Eklov Prairie Ronde Dale Smith

Schoolcraft Virginia Mongreig Township Texas Township **Emily Beutel** Wakeshma Township Shawn Fritz

Rod Halcomb rodo55@att.net Kim Harris kaharris1@att.net hillcrestequity@aol.com Kerry Lynn Elieff Sabrina Prichett-Evans pritchettevans@yahoo.com Kristina Karamo kristina@migop.org

**Bear Priest** 

Mary Stage

Email clerk@alamotownship.org bradyclerk@centurytel.net clerk@charlestontownship.org Clerk@climaxtownship.org clerk@comstockmi.gov clerk@coopertwp.org clerk@galesburgcity.org

cokcityclerk@kalamazoocity.org

clerk@kalcounty.com Clerk@ktwp.org dfarmer@oshtemo.org

clerk@parchment.org clerk@paviliontwpmi.gov cityclerk@portagemi.gov

clerk@prairierondetwp.net bpriest@richlandtwp.net clerk@rosstownshipmi.gov

vmongreig@schoolcrafttownshipmi.gov emilyb@texastownship.org clerk@wakeshmatownship.com



#### STATE COMMITTEE SPECIAL MEETING

January 13, 2024, 10:00am

Northern Michigan Banquet & Event Center
7784 Stone School Rd.

Houghton Lake, MI 48629

Dan Bowe led the Pledge of Allegiance. Daire Rendon opened with prayer.

The meeting was called to order at 10:45am.

The Secretary announced there were 83 credentialed members present. The meeting paused to reconnect to wi-fi for virtual attendees.

Dan Bonamie presented a report on better political representation.

Heath Wall, Policy Committee Chair was asked to present a report.

A point of order was called by Kristin Lee for a roll call attendance to be made. The Chair put it to a vote and the vote fell. Heath Wall presented the Policy Committee's report that the January 6, 2024 meeting was illegitimate and that there was a recommendation that Co-Chair Malinda Pego violated conflicts of interest under MRSC Bylaws Article III Section M.9.&10. Further, the Policy Committee recommended that members Andy Sebolt, Bree Moeggenberg, Tim Ross, Anne DeLisle, JD Glaser and Dan Lawless be further investigated for conflicts of interest violations under MRSC Bylaws Article III Section M.9.&10. The motion to find Malinda Pego in violation of MRSC Bylaws Article III Section M.9.&10 was moved and seconded by the Policy Committee. Discussion was opened to the floor. Dan Hartman made a motion to move this agenda item to the bottom of the agenda. A second was made. Discussion was opened to the floor. The Chair called a vote, and the result was inconclusive. A standing counted vote was taken, and the motion carried.

Dan Hartman made a motion to not accept the legitimacy of the January 6<sup>th</sup> meeting per the Policy Committee's findings. A second was made. Discussion was opened to the floor. Fred Niedstandt called the question. A second was made. The vote was taken, and the motion carried. The Chair called for a vote to accept the motion on the floor and the motion carried.

Dr. Phil O'Halloran gave the Election Integrity Committee Report.

Dr. Angela Hall gave the Issues Committee Report that included the three resolutions previously emailed to all SC members. The adoption was moved and seconded by the Issues Committee. Kim Harris made a motion to adopt all three resolutions. Dan Hartman asked to consider each individually via a friendly amendment. Kim Harris accepted the friendly amendment. There was a second. The adoption of the Michigan Republican Party State Committee Resolution To Stop The Prosecutions Of Donald J. Trump was opened for discussion. Monika Feibing called the question. A second was made. The Chair called for a vote and the motion carried. The Chair called for a vote on the motion on the floor and the motion carried.

The adoption of the Resolution to End the United States of America's Financial and Military Involvement in the War in Ukraine was opened for discussion. Monika Fiebing called the question. A second was made. The Chair called for a vote and the motion carried. The Chair called for a vote on the motion on the floor and the motion carried.

The adoption of the Resolution to End the United States of America's Financial and Military Involvement in the War in Ukraine was opened for discussion. John Schaut called the question. A second was made. The Chair took a vote and the motion carried. The Chair called for a vote on the motion on the floor and the motion carried.

Dan Bonamie, Chair of Budget Committee presented report. This was screenshared with the virtual attendees. Kristin Lee called a point of order that this report is out of order. Chair Karamo ruled the point of order is not well taken. Jennifer Standerfer, Treasurer spoke on the expenses. Dan Bonamie presented the remainder of the report. Dan Hartman, General Counsel answered questions regarding the Seymour building and the trust. John Schaut made a motion to accept the budget committee report. A second was made. The Chair took a vote and the motion carried.

The Chair turned the meeting over to Joel Studebaker to chair the next two agenda items. Joel Studebaker opened the floor for the Karamo Q&A.

Joel Studebaker asked if there was a motion for Removal of Chair Karamo under MRSC Bylaws Article V. Viviene Curenca made the motion. A second was made. Ken Beyer made a motion for a roll call vote. A second was made. The vote was taken. The result was unclear. Division was called. A standing vote was taken and the vote for a roll call vote carried. Joel Studebaker opened discussion on the motion on the floor for removal of Chair Karamo. Dan Bonamie made a motion to suspend the 54-signature requirement for removal of Chair Karamo and that the findings will be final. A second was made. Bill Lethemon called the question. A second was made. A vote was called on the previous question. The motion carried. Joel Studebaker took a vote on the motion to include suspending the 54-signature rule of the bylaws. The parliamentarian Ralph Rebandt spoke to explain that Chair Karamo is waving the 54-vote requirement and that RONR allows for this.

Joel Studebaker moved the motion to suspend the 54-signature rule in the bylaws. A second was made. A vote was taken. The motion carried. The motion on the floor to remove Chair Karamo was opened for discussion. Dan Hartman called the question. A second was made. The motion carried. A roll call vote was taken. The result of the vote was 59 No and 1 Yes.

Chair Karamo re-assumed the Chair duties of the meeting.

Dan Bonamie motioned for the removal of Andy Sebolt, Bree Moeggenberg, Randy Guppy, Jon Rocha, JD Glaser, Daniel Lawless, Anne DeLisle, Bill Rauwerdink, and Dan Wholihan for violating their fiduciary duties, duty of loyalty and duty of care under Article 3.M.1. A second was made. The Chair conferred with the parliamentarian.

The Chair called a for a brief recess. At 1:53pm the meeting was called back to order.

Dan Bonamie amended his motion to only include members Andy Sebolt, Bree Moeggenberg, JD Glaser, Dan Lawless, Anne DeLisle and Tim Ross per the report from the Policy Committee without the recommendation from the Policy Committee for violations of conflict of interest. A second was made. Bonnie Burke offered an amendment to add Jon Rocha and Randy Guppy. A second was made. The motion was not moved to the floor and Bonnie Burke withdrew her motion.

Dan Bonamie motioned to move the removal motion to the bottom of the agenda. A second was made. Call to question was made by Peggy Doornbos. A second was made. The Chair took a vote and the motion carried. The Chair took the vote on the motion on the floor to move the item to the bottom of the agenda. The motion carried.

Cheryl Costantino presented the rules for the August Convention Rules. The motion was moved and seconded by the Policy Committee. Discussion was open. A question was called by Ken Beyer. A second was made and the motion carried. A vote was taken on the motion on the floor to adopt the August Convention Rules and the motion passed.

Ken Beyer made a motion that this Michigan Republican Party State Central Committee vote to accept the will of the delegates of Kalamazoo County according to their September 15, 2023 special convention by recognizing Rod Holcomb as chair, Kerry Lynn Elieff as vice chair, and recognize all other officers and members of the executive committee in Kalamazoo as elected on September 15, 2023 and register them with the Secretary of State's Bureau of Elections. A second was made. Discussion was opened to the floor. Margo Aseltine called the question. A second was made. The Chair took a vote, and the motion did not carry. Discussion continued. Previous question was called. A second was made. The Chair took a vote and the motion carried. A vote was taken on the motion on the floor. The motion passed unanimously.

The Chair announced that the motion on the floor is to re-visit the agenda item from the Policy Committee that Co-Chair Malinda Pego violated conflicts of interest under MRSC Bylaws Article III Section M.9.&10. The Chair opened discussion to the floor. Previous question was called. A

second was made. The Chair took a vote and the motion carried. The Chair called for a vote on the motion on the floor. Roll call vote was requested and taken. The result of the vote is 76 Yes, 2 No, 3 Abstain. (The votes from only state committee members; the result is 52 Yes, 2 No, 3 Abstain.) The motion carried.

Dan Bonamie returned to the floor to repeat his item of business that was moved down the agenda. He motioned to find Andy Sebolt, Bree Moeggenberg, Tim Ross, Anne DeLisle, JD Glaser and Dan Lawless in violation of conflicts of interest. A second was made. Discussion was opened to the floor. Dan Hartman made a motion to postpone the item of business to another day. A second was made. Discussion was opened to the floor. Peggy Doornbos called the question. A second was made. The Chair took a vote and the motion carried. The Chair took a vote to postpone the main motion and the motion fell. Discussion was re-opened for the main motion. Dan Bonamie called the question, a second made and motion carried. The Chair announced there was a vote on the main motion. A roll call vote was requested and taken. The result of the vote is 61 Yes, 5 No, 15 abstain. (The votes from only state committee members; the result is 41 Yes, 5 No, 10 Abstain.) The motion carried.

The Chair asked for a motion to adjourn. Fred Nienstedt moved to adjourn. A second was made and the motion carried. The meeting was adjourned at 3:35pm.

Submitted:

Angela Gillisse Secretary Monday, January 15, 2024

## Exhibit 22











# **Rodney Halcomb**

10:24 PM

To: chair@kgop.us Cc: Rodney >

# Access Code to Amend Statement of Organization

Hi Kelly,

Since the MIGOP has recognized the new Executive Committee leadership elected on September 15th, 2023, as the official leadership team in Kalamazoo, would you be willing to provide me with the SOS access code so we can amend the Statement of Organization?

I'm really sorry it came down to this.

I'm willing to discuss issues and try to work them out between our two groups. I hope we can work together moving forward and by working together we can accomplish our similar goals of getting conservatives elected.

Rod







