

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF KALAMAZOO

SABRINA PRITCHETT-EVANS
and KIMBERLY HARRIS,

Plaintiffs,

Case No. 2023-0169-CZ
Hon. Curtis J. Bell

vs

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

Defendant.

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VIDEOCONFERENCE DEPOSITION OF JOEL STUDEBAKER,  
taken on Wednesday, July 19, 2023, at 10:00 a.m.,  
pursuant to Notice.

Reported remotely by DEBORAH LINEHAN, CER 7251

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A P P E A R A N C E S

Appearing for Plaintiffs:

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ALSO PRESENT: Kim Harris, Charley Coss,

Kelly Sackett, Sabrina Pritchett-Evans.

W I T N E S S I N D E X

Witness	Page
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Examination by Mr. DePerno	6

E X H I B I T I N D E X

(Exhibits retained by Mr. DePerno)

(Reporter was remote and did not receive or mark exhibits)

Exhibit	Description	Page
None marked.		

1 Wednesday, July 19, 2023

2 Approximately 10:31 a.m.

3 * * *

4 This deposition is being held via
5 videoconferencing. The witness and reporter are not in
6 the same room. The witness is being sworn remotely
7 pursuant to agreement of all parties. All parties
8 stipulate that the oath has the same force and effect
9 as if the witness was sworn in person.

10 ** ** **

11 JOEL STUDEBAKER

12 was thereupon called as a witness herein, and after
13 having been first duly sworn to tell the truth, the
14 whole truth, and nothing but the truth, was examined
15 and testified as follows:

16 MR. DEPERNO: Can you please state your full
17 name and spell your name?

18 THE WITNESS: Joel Studebaker. J-O-E-L,
19 S-T-U-D-E-B-A-K-E-R.

20 MR. DEPERNO: Have you ever had your
21 deposition taken before?

22 THE WITNESS: No.

23 MR. DEPERNO: So I'll go over some basic
24 rules with you. The court reporter's here. She'll be
25 taking down what we say for the record. I'll be asking

1 questions. Please wait until I finish asking the
2 question before you answer so that we don't talk over
3 each other so we can get a clean record.

4 THE WITNESS: Uh-huh.

5 MR. DEPERNO: Does that makes sense?

6 Does that sound good to you?

7 All right. Do you have any conditions that
8 would affect your memory?

9 THE WITNESS: No.

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

13 THE WITNESS: No.

14 MR. DEPERNO: Are you taking any medication
15 that would affect your memory?

16 THE WITNESS: No.

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

20 THE WITNESS: No.

21 MR. DEPERNO: Do you have any other reason to
22 believe or are there any other things that you believe
23 are affecting your memory today or your ability to
24 answer completely and truthfully today?

25 THE WITNESS: No.

1 ** ** ** ** **

2 E X A M I N A T I O N

3 BY MR. DEPERNO:

4 Q What is your date and place of birth?

5 A Fort Recovery, Ohio. July 3, 1980.

6 Q And your home address?

7 A 200 24th Avenue, Hudsonville, 49426.

8 Q How long have you lived at that address?

9 A Five years.

10 Q And where did you live before that address?

11 A Byron Center.

12 Q How long have you lived in Michigan?

13 A Since 1998. So 25 years.

14 Q Have you ever been convicted of fraud or any other
15 crime or misdemeanor or felony?

16 A No.

17 Q Have you ever been investigated for fraud or any other
18 crime, misdemeanor, or felony?

19 A No.

20 Q Have you ever been involved in any civil litigation?

21 A I don't think so.

22 Q So have you -- you've never been a plaintiff or a
23 defendant in a lawsuit?

24 A I guess, technically, no.

25 Q What do you mean technically? Is there some --

1 A We had an Ottawa issue last fall, and apparently I was
2 not a plaintiff or a defendant even though -- I don't
3 know, but you can explain it.

4 Q Okay.

5 A It was a mess.

6 Q So in the Ottawa County -- I think you're referring to
7 a lawsuit that was filed in Ottawa County regarding the
8 Ottawa County Republican Party?

9 A Correct.

10 Q You were not --

11 A I was not listed.

12 Q -- who filed that lawsuit?

13 A Three delegates.

14 Q And did they list as a defendant the Ottawa County
15 Republican Party?

16 A Ottawa County Republican Party Executive Committee.

17 Q Understood. And you were a part of the executive
18 committee?

19 A I was a part of the new executive committee, and we
20 were left out of the case effectively.

21 Q And other than that case, you haven't been involved in
22 any other civil litigation?

23 A Correct.

24 Q Where are you currently employed?

25 A I have my own business.

1 Q And what is your business?

2 A I'm not willing to say because I don't want it used
3 against me.

4 Q Well, you have to answer the question.

5 A I don't want to answer the question. You can look it
6 up on LARA. I mean, it's listed so...

7 Q Well, if it's listed, then you should have no problem
8 telling us because --

9 A It's a digital marketing company.

10 Q And what's the name of it?

11 A Is there any legal recourse? I don't want -- this
12 can't be used against me in any way, shape, or form.

13 Q I don't know how it would be used against you, but
14 we're certainly able to explore your experience, and
15 what you do for a living. I mean, if you can explain
16 what your concern is, I could try to help alleviate
17 your concern.

18 A Yeah. That you and others would try to use it to
19 damage my business, and go to people that would cause
20 damage to my business.

21 Q Well, I can assure you I have no interest in damaging
22 your business. I'm just trying to understand what your
23 work experience is and --

24 A It's a digital marketing company.

25 Q -- but, otherwise, you're not willing to tell me the

1 name of it?

2 A I need some sort of legal guarantee on that.

3 Q So you're saying we can just look up your business on
4 LARA?

5 A Or whatever the LLC thing is, you could look it up.

6 Q And when you say digital marketing, what type of
7 digital marketing do you do?

8 A It's all online and indoor -- it's called an indoor
9 builder network.

10 Q Does that mean that you -- your clients hire you to
11 place ads on the internet; is that what it is?

12 A No.

13 Q Can you explain to me what you --

14 A On TVs and businesses, local businesses. All local --
15 local advertising.

16 Q How many employees does your business have?

17 A Zero other than myself.

18 Q Are there any other owners?

19 A No.

20 Q Do you have a high school diploma?

21 A Yes.

22 Q Where'd you graduate high school?

23 A Genesee.

24 Q Do you have a college degree?

25 A Yes.

1 Q From where?
2 A Cornerstone.
3 Q When did you graduate college?
4 A 2002.
5 Q And what type of degree do you have?
6 A BS in accounting.
7 Q What years did you attend?
8 A '99 to '02.
9 Q Other than your driver's license, do you have any other
10 licenses?
11 A No.
12 Q Do you have a CPL?
13 A No.
14 Q Do you have any certifications?
15 A What do you mean, professional or what?
16 Q Yeah, professional certifications.
17 A No professional certifications.
18 Q I'll give you Exhibits 1 and 2. So Exhibit 1 is titled
19 Amended Notice of Deposition. Have you seen that
20 document?
21 A Yep.
22 Q Is this how you knew that you were required to be here
23 today?
24 A Yeah.
25 Q And you understand today that you're here as part of a

1 lawsuit, correct?

2 A Correct.

3 Q The plaintiffs in this case are Sabrina Pritchett-Evans
4 and Kimberly Harris, correct?

5 A Yep.

6 Q And the defendants are the Republican Party of
7 Kalamazoo County, State of Michigan; the Kalamazoo
8 Grand Old Party Executive Committee; and the Kalamazoo
9 County Republican Committee and Kelly Sackett, correct?

10 A Sure.

11 Q What did you do today to prepare for your deposition?

12 A Effectively nothing.

13 Q Did you talk to anybody?

14 A No.

15 Q Exhibit 2 --

16 A To be clear, nothing beyond a little chitchat. I don't
17 know what you're looking for but...

18 Q Well, I mean, the question is, did you talk to anybody
19 about your deposition? So you're saying there was
20 chitchat then who did you talk to?

21 A Well, me and Jimmy had a short conversation out in the
22 hallway. Effectively tell the truth and I'm not
23 coaching you. I mean, because I need to be able to
24 speak the truth and carry the integrity that I always
25 do. That would be it.

1 Q Did you bring any documents with you today?

2 A No.

3 Q I see some papers in front of you.

4 A This is my papers.

5 Q Okay. Exhibit 2 is a subpoena that was served on you.
6 Do you recall that?

7 A Yep.

8 Q And as of today you don't have any documents that you
9 would produce pursuant to the subpoena?

10 A Correct.

11 Q You mentioned earlier that you had some involvement
12 with the Ottawa County Republican Party. Can you
13 describe when that involvement started?

14 A I was elected a precinct delegate in August of last
15 year.

16 Q That's 2022, correct?

17 A Correct.

18 Q Prior to August of 2022, have you ever been a precinct
19 delegate?

20 A No.

21 Q Prior to August of 2022, had you been a member of the
22 Ottawa County Republican Party?

23 A No.

24 Q Have you been a member of any county Republican party?

25 A No.

1 Q Have you been a member of any other political
2 organization?

3 A No.

4 Q After August 2022, did you -- were you elected as the
5 county chair for Ottawa County Republican Party?

6 A Yes.

7 Q When was that election?

8 A December 15 and January 16. It happened twice.

9 Q Why did it happen twice?

10 A There was a lawsuit that I referred to earlier. That
11 the result of which forced us to redo our convention to
12 elect our executive committee, and our election of our
13 officers.

14 Q So the first election or county convention was
15 December 15, 2022, correct?

16 A The convention was December 1, and then according to
17 MCL 168.599 the election was December 15.

18 Q Do you know the names of the people who filed the
19 lawsuit?

20 A Not off the top of my head. It's been a while. A lot
21 has happened.

22 Q But you're saying they were delegates?

23 A There were three delegates.

24 Q Why did they file a lawsuit?

25 A They didn't like how the convention was -- how it was

1 run or how it occurred.

2 Q Can you be more specific in telling me what
3 specifically they didn't like?

4 A I don't know. They just didn't like it.

5 Q Did the Ottawa County Republican Party hire an
6 attorney?

7 A Yes.

8 Q Who was the attorney?

9 A Well, wait a minute. The Ottawa County Republican
10 Party, no.

11 Q The Ottawa County Republican Executive Committee?

12 A Which one, old or new?

13 Q Well, the old one. I guess the one -- well --

14 A The old one hired an attorney and so did we.

15 Q Okay. So the -- was the old executive committee a
16 plaintiff or a defendant?

17 A Defendant.

18 Q And what about the new executive committee, were they
19 also a defendant?

20 A We still don't know. It was a messed up case, and we
21 don't know.

22 Q So in terms of the polls --

23 A I can tell you what the judge ruled.

24 Q -- okay. Let's -- let's -- Yeah, that's a good idea.

25 A The ruling would have indicated that the old executive

1 committee was the defendant.

2 Q So who did the old executive committee hire as their
3 attorney?

4 A I can't remember his name.

5 Q Who did the new executive committee hire as an
6 attorney?

7 A Jimmy. James Thomas.

8 Q Was there -- what was the ultimate decision made by the
9 Court?

10 A They ruled that the -- what's it called? --

11 MR. THOMAS: Consent judgment.

12 THE WITNESS: -- consent judgment, thank you.
13 They ruled the consent judgment stood, and so we had to
14 redo our convention to elect our executive committee.

15 BY MR. DEPERNO:

16 Q So if I understand this correctly, three delegates sue
17 the old executive committee, and then the parties to
18 the case enter into a consent judgment --

19 A Uh-huh.

20 Q -- stating that the convention has to be redone?

21 A Correct.

22 MR. THOMAS: Just so you know, Denhollander
23 was also a defendant in that case.

24 MR. DEPERNO: Okay.

25 MR. THOMAS: It was the OCREC and

1 Denhollander.

2 THE WITNESS: He was not listed.

3 MR. THOMAS: He was listed and he consented
4 to the judgment.

5 BY MR. DEPERNO:

6 Q Well, that doesn't sound very fair to the new executive
7 committee, does it?

8 A We would agree.

9 Q So you then redo the convention in January on
10 January 16th?

11 A Correct.

12 Q And what was -- was there a different result from
13 January 16th compared to December 1st?

14 A So we have 24 delegate members, and 23 were the same
15 and one changed.

16 Q And then you were elected a second time as the county
17 chair?

18 A Yep, that same evening. Yep.

19 Q Have you ever been the chair of the district committee?

20 A No.

21 Q Do you have any training in parliamentary procedure or
22 Robert's Rules of Order?

23 A Yes.

24 Q What training do you have?

25 A Robert's Rules boot camp, two sessions, four hours

1 each, and personal study.

2 Q Who was the instructor for the boot camp?

3 A J.D. Glaser.

4 Q After your boot camp are you issued any type of
5 certification?

6 A No.

7 Q Does J.D. Glaser have any type of certification?

8 A Not to my knowledge.

9 Q Have you ever been a parliamentarian at any meeting?

10 A Yes.

11 Q When?

12 A The initial District 4 committee meeting.

13 Q When was that?

14 A Late February, early March. I don't remember the exact
15 date.

16 Q Any other meetings where you were a parliamentarian?

17 A No.

18 Q Do you have any role with the Michigan Republican Party
19 or the MIGOP?

20 A Yes.

21 Q What is your role?

22 A Chief of staff.

23 Q What are your duties as the chief of staff?

24 A I oversee the business side of the party: HR, IT,
25 things like that, accounting.

1 Q On the HR side, how many employees does the MIGOP have?

2 A There are three on payroll.

3 Q Who are they?

4 MR. THOMAS: I'm going to object. This has
5 got nothing to do with our case.

6 MR. DEPERNO: Of course it does.

7 MR. THOMAS: No, it's got nothing to do with
8 it. You're way outside the boundaries again.

9 MR. DEPERNO: Of course it does. I can
10 explore his qualifications.

11 MR. THOMAS: You're asking about names of
12 employees of my guy. We're not going there. Sorry.
13 Move on. I'm objecting. You can bring it to the
14 judge.

15 I'm going to be objecting a lot about that
16 today. Every time you get out of bounds I'm going to
17 object now.

18 MR. DEPERNO: Well, so you're instructing the
19 witness to --

20 MR. THOMAS: I'm not instructing the witness
21 anything. I'm telling you you're out of bounds.
22 You're not in the parameters that the Court ordered so
23 we're not going to go there. You can bring it up to
24 the judge. File your motion and do whatever you've got
25 to do. We're not going to go into employees of my guy.

1 It's got nothing to do with this case.

2 MR. DEPERNO: Objection noted for the record,
3 and I'll ask that the witness again.

4 BY MR. DEPERNO:

5 Q Who are the three employees that --

6 (Indiscernible crosstalk.)

7 MR. THOMAS: Objection.

8 BY MR. DEPERNO:

9 Q -- oversees?

10 MR. THOMAS: He's not going to answer it. He
11 doesn't have to answer it. You're outside the
12 parameters.

13 MR. DEPERNO: If you could not speak over
14 each other, that'd be great for the court reporter.

15 BY MR. DEPERNO:

16 Q So you're refusing to answer about the employees you
17 oversee?

18 MR. THOMAS: Objection. He's not refusing to
19 answer. I'm telling him not to answer because you are
20 out of bounds. This is not a fishing expedition. The
21 judge specifically told you we're not doing a fishing
22 expedition.

23 BY MR. DEPERNO:

24 Q Okay. What is your role as the IT director from --

25 A I'm not the IT director.

1 Q -- well, you said you oversee IT?

2 A That doesn't make me the IT director.

3 Q So what do you -- what's your job if you oversee IT?
4 What do you do?

5 A To manage whoever would handle IT.

6 Q Who handles IT?

7 A Actually, right now nobody. We just internal make it
8 happen. We're in between either a vendor or employee.
9 We don't have anybody right now.

10 Q That's a problem, isn't it?

11 MR. THOMAS: Objection. It's got nothing to
12 do with this case. Matt, you haven't conceded your
13 seat yet over there. You're trying to fish for
14 information. I'm objecting. You can bring it to the
15 judge, and explain to him why you need to know the
16 answers to those questions.

17 MR. DEPERNO: Okay. Jimmy, it's not about
18 me.

19 MR. THOMAS: It is about you.

20 MR. DEPERNO: No.

21 MR. THOMAS: You're a defendant in this case,
22 you're a witness in this case, and you have not
23 conceded your loss for the MIGOP chair so move on. You
24 can -- you can make a record, and you can bring it back
25 to the judge.

1 MR. DEPERNO: It's not about me, but
2 certainly I'm able to inquire about the witness's level
3 of expertise, his experience, his job credentials, and
4 what he does for the MIGOP. It's totally within
5 bounds. And to make an objection that I can't inquire
6 into those issues, and to instruct the witness then to
7 not answer is absolutely interfering with our ability
8 to take the deposition.

9 MR. THOMAS: If I'm wrong, then I'm wrong. I
10 think you're outside the parameters, and the judge
11 specifically told you not to go on a fishing
12 expedition, and you're trying to get names and
13 information that are not relevant to this case. Now if
14 you want to ask him about his IT experience and his job
15 at MIGOP, that's fine. But you're asking about other
16 people and what they're doing or what -- and you
17 said -- that poses a problem.

18 So you're obviously in disagreement with what
19 they're doing over there because you have personal
20 ties.

21 MR. DEPERNO: I don't care about what --

22 MR. THOMAS: Matt, I'm not going to argue
23 with you.

24 MR. DEPERNO: -- you are arguing. You're
25 spending your entire time arguing with me when I'm

1 simply trying to ask a question about who handles the
2 IT because it's relevant to the issue.

3 MR. THOMAS: How is that relevant? Put on
4 the record why it's relevant to the issue.

5 BY MR. DEPERNO:

6 Q Mr. Studebaker --

7 MR. THOMAS: Please put on the record why
8 it's relevant.

9 MR. DEPERNO: -- stop yelling, Jimmy.

10 MR. THOMAS: No, I'm not yelling.

11 BY MR. DEPERNO:

12 Q Okay. Mr. Studebaker, so if you manage whoever handles
13 IT, what are your qualifications for IT?

14 A I was a finance director in a corporation, and I handle
15 HR, IT, marketing, accounting, all sorts of functions
16 of the business. Everything I'm doing now I've done
17 before.

18 Q And what business did you do with before?

19 A Pregis Films.

20 Q Pregis?

21 A Correct?

22 Q How do you spell it?

23 A P-R-E-G-I-S.

24 Q How long did you work in Pregis Films?

25 A Four years.

1 Q And what do you -- when you say IT, will you please,
2 for the record, describe what you mean by IT?

3 A All things technology.

4 Q Are you paid by MIGOP?

5 A No.

6 Q You also said you oversee accounting. What do you do
7 in the area of accounting?

8 A I am the -- as chief of staff my job is to oversee the
9 members of the team, and what they do from a managerial
10 perspective. The answer is the same to all of these
11 functions, it's management.

12 Q So when you oversee the accounting team, how many
13 people are on the accounting team?

14 A I've got to question relevancy here.

15 Q Relevance is not an appropriate objection in a
16 deposition, and certainly I'm able to inquire when you
17 talk about your experience and your job, how many
18 people do you oversee is certainly a relevant question.
19 Not that relevance is a proper objection.

20 A Why? Why is it relevant?

21 Q Well, I get to know. Is it hundred people? That's
22 significant.

23 A Why is it relevant to this case?

24 Q It's -- it's relevant to your qualifications as Jimmy
25 Thomas naming you as a person with experience regarding

1 the Michigan Republican Party. And I'm, therefore,
2 able to properly ask you questions about your role in
3 the party, what you do, who you oversee, what your job
4 duties are, how many people you manage. That's all
5 certainly relevant to this deposition.

6 So how many people do you manage on the accounting
7 team?

8 A One.

9 Q How many MIGOP state party chairs have you advised in
10 the past?

11 A What does -- what do you mean by MIGOP state party
12 chair?

13 Q Michigan Republican Party state party chair, chairman
14 or chairwoman.

15 A The chair of the entire party?

16 Q Yeah. How many have you advised?

17 A Zero.

18 Q How many district chairs have you advised in the past?

19 A When you say past, you need to put parameters on that.
20 What are your date parameters?

21 Q Ever.

22 A From today?

23 Q From now until the day you were born, how many district
24 chairs have you advised?

25 A What's your definition of advise?

1 Q Offered advice to.

2 A I don't know, four or five.

3 Q Who are they?

4 MR. THOMAS: What's the purpose of going into
5 that? Put on the record why you need that --

6 MR. DEPERNO: To understand his experience.
7 It's an absolutely perfect relevant question --

8 (Indiscernible crosstalk.)

9 MR. THOMAS: In regard to what?

10 MR. DEPERNO: His experience in the
11 Republican Party. There's nothing wrong with that
12 question.

13 MR. THOMAS: Why do you need to know? If he
14 says five people, then what's the difference?

15 MR. DEPERNO: I want to know who they are.

16 MR. THOMAS: You don't need to know who they
17 are.

18 MR. DEPERNO: Of course I need to know who
19 they are.

20 MR. THOMAS: Why?

21 BY MR. DEPERNO:

22 Q Okay. Can you tell me --

23 MR. THOMAS: Why do you need to know who they
24 are? I'm asking the question, Matt.

25 MR. DEPERNO: Because it's relevant to know

1 who he advised.

2 MR. THOMAS: Why?

3 MR. DEPERNO: It's absolutely relevant to
4 understand the names of who he has advised.

5 MR. THOMAS: Why do you need to know the
6 names?

7 MR. DEPERNO: Dave DeShaw had no problem
8 answering that question in his deposition, and he gave
9 you multiple names of multiple people he has advised in
10 the past. No one made an objection because it is
11 perfectly relevant to understand who someone is giving
12 advice to.

13 BY MR. DEPERNO:

14 Q So please answer the question.

15 A Yeah, I don't see the relevance either.

16 MR. DEPERNO: Can we go off the record now.

17 (Break in proceeding taken from
18 11:00 a.m. to 11:10 a.m.)

19 MR. THOMAS: I want to put this on the record
20 real quick that I do not represent Joel Studebaker.
21 I'm not his attorney, and so I'm making my objection as
22 to Mr. DePerno's question and as -- as the plaintiffs'
23 attorney, not as Mr. Studebaker's attorney. So he is
24 free to either answer or not answer the questions that
25 Mr. DePerno asks. I'm not instructing him either way

1 to answer or not answer the questions. I'm making my
2 objection based on the Court's prior ruling.

3 MR. DEPERNO: Okay. So the record will show
4 and the record will be clear that you have actually
5 advised the witness to not answer, but the record is
6 what the record is. So --

7 MR. THOMAS: I'm not advising him not to
8 answer. I made my objection on the record to the --

9 MR. DEPERNO: The record will be what the
10 record is, Jimmy, when you previously advised the
11 witness not to answer. So let's move on.

12 I tried to call the Court to see if we could
13 get some direction from the Court. Judge Bell was not
14 available, but a staff attorney apparently stated that
15 we can -- we should try to do what we can in the
16 deposition, and if required, perhaps I should file a
17 motion for show cause and for contempt.

18 BY MR. DEPERNO:

19 Q So I'll ask you the question again because in my view
20 it's certainly relevant regarding Jimmy Thomas stating
21 in Court that you were -- that he's calling you as a
22 witness tomorrow, and with the Court having issued an
23 order requiring you to be a witness tomorrow it's
24 certainly relevant for me to have an understanding in
25 this capacity of who -- what district chairs you have

1 advised.

2 A So I'm going to go back and ask you again. What is the
3 definition of advice?

4 Q Well, as I said, giving any advice. You said you've
5 given four or five district chairs advice. I'd like to
6 know the name of those four or five chairs --

7 A What constitutes advice? Because I'm questioning
8 whether I've actually given any of them advice because
9 it depends on what that actually means.

10 Q Well, why don't we start with you giving the four or
11 five names of the people you --

12 A No, you need to define advice for me.

13 Q -- I don't have to define anything. I can ask you
14 questions --

15 A Okay. Then I've given zero. No advice to anybody
16 then. You have to define advice.

17 Q As I said, giving advice. Advice is a very common
18 term. We all know what the term advice means.

19 A Great. So what I provided was opinions. So if
20 opinions constitute advice, you need to define that for
21 me.

22 Q Okay. Then which four or five district chairs have you
23 given opinions to?

24 A That wasn't your original question.

25 Q No. Let's change the question and now talk about

1 opinions. Which four or five district chairs have you
2 given opinions --

3 A And how is that relevant to my level of expertise?

4 Q It's absolutely relevant. It's probably a critical
5 issue in terms of who you're giving advice to, and then
6 once you give me those names --

7 A I give opinions to everybody in my life that I talk to.
8 You want me to list everybody in my life that I give
9 opinions to?

10 Q I care right now about the district chairs you've given
11 opinions to.

12 A So since we're on the record it's my opinion that you
13 are executing a fishing expedition right now to learn
14 everything you can about my -- I don't understand how
15 this is relevant to the case at hand that I have in my
16 hand right here that is about District 4 and about
17 Kalamazoo. Actually, it's entirely about Kalamazoo to
18 be exact. It's not about District 4. So how is it
19 relevant?

20 Q Well, it's relevant as to your credentials. That's
21 what it's relevant to. You are a person who's being
22 called to testify tomorrow, based on Jimmy Thomas's own
23 representation in the Court, that you would be called
24 as someone who has knowledge about party history,
25 parliamentary procedure, and bylaws. Therefore,

1 understanding your ability to give opinions and advice
2 to people is absolutely relevant, and it would be a
3 standard question any attorney would ask any testifying
4 witness about.

5 A Right. But you're not asking what advice I've given or
6 what my expertise is. You're asking who I've given it
7 to, which doesn't prove anything about what my level of
8 expertise is.

9 Q Well, we're going to --

10 A The question doesn't make any sense.

11 Q -- we're going to talk about what -- what advice or
12 opinions you've given to people, but it certainly --
13 we're entitled to know who you've given those opinions
14 to, and I don't understand why this is a difficult
15 question. If I was deposing any so-called expert in
16 any field, I'd be able to ask the question, who have
17 you given advice or opinions to in the past. And they
18 would not only welcome that question, they would
19 probably provide a CV to me with a list of their
20 credentials and who they have advised.

21 A Awesome. You know what, the way the party moves
22 forward is not the way it's done in the past. The way
23 that I operate is not based on how other people have
24 done it. So with all due respect, I don't care what
25 other people say or would be happy to say or what makes

1 them -- their ability to defend their so-called
2 expertise.

3 Q Okay. So --

4 A What they do is theirs, and what I do is mine. That's
5 that that was an irrelevant comment you just made.

6 Q So let's start again with -- give me the names of the
7 four or five district chairs you would give opinions
8 to.

9 A So I give opinions to every district chair I've ever
10 talked to. So I'd have to think through all the
11 district chairs that I've ever known, and just list off
12 all their names. I'd have to fill out a list and read
13 them all, and I don't have that all in my memory.

14 Q Well, you just said four or five. Let's start with the
15 four or five you must have --

16 A That was for advice. And now I'm questioning your
17 definition of advice so I'm not willing to admit that
18 I've given any advice to anybody. In terms of
19 opinions, I've given opinions to lots of people.

20 Q Okay. So what district chairs have you given opinions
21 to?

22 A Everybody I've ever talked to.

23 Q Everybody?

24 A I have lots of opinions. I give them all the time.

25 Q Okay. Let's -- what types of opinions do you give to

1 district chairs?

2 A Anything related to politics. Anything related to
3 personal stuff. We talk about faith. I talk about how
4 Jesus is the answer for everybody. I talk about
5 everything with them. Those are all my opinions.

6 Q Let's talk about --

7 A First Amendment freedom of speech.

8 Q -- let's talk specifically about politics. What advice
9 would you give to the District 1 chair?

10 A That our party is based on the Constitution first and
11 our platform second, and everything should fall
12 underneath that.

13 Q Have you given the first district chair any other
14 advice or any other opinions other than what you just
15 stated?

16 A I don't even know who the first district chair is.
17 Who's the first district chair? I'd have to look it
18 up. I don't memorize this stuff.

19 Q Okay. So as --

20 A I never said -- I never --

21 MR. THOMAS: Wait a minute. You picked the
22 first district out of the blue.

23 BY MR. DEPERNO:

24 Q So as the -- as the chief of staff for the party, you
25 don't know who the district chair is?

1 A Go ahead and tell me the name or her name, and then
2 I'll tell you if I know who they are. Einstein was
3 asked his phone number once and he said I don't know.

4 Q Well, it's --

5 A I write it down. Why would I memorize something I can
6 write down. I take that to heart. I can look it up.

7 Q Well, let's see what we can find up on this website.
8 I'm looking at the MIGOP website. First district chair
9 is Sue Allor. Have you given Sue Allor any opinions?

10 A No.

11 Q This doesn't have to be difficult. It really doesn't.

12 A You're asking me to say stuff from memory that I don't
13 have on memory.

14 Q District 2 chair is Andy Sebolt. Have you given Andy
15 Sebolt any opinions?

16 A No.

17 Q Have you given Dan Cool any opinions?

18 A Yes.

19 Q He's third district chair.

20 A He's in Ottawa.

21 Q What opinions have you given Dan Cool?

22 A I've had multiple conversations with Dan over the last
23 year. He's one of our Ottawa delegate members.

24 Q And so as the district chair, what opinions have you
25 given?

1 A The same things I just told you. We just talk about
2 the Constitution, the platform, how we're operating as
3 a party, and are we aiming at the right things.

4 Q Okay. So in that context, are we aiming at the right
5 things?

6 A Some of us are.

7 Q And how do you define aiming at the right things?

8 A By the Constitution and the party platform. All the
9 tenants of the platform in alignment underneath the
10 Constitution, which the entire platform does.

11 Q Ken Beyer is the fourth district chair. Have you given
12 him any advice?

13 A Opinions.

14 Q Opinions, I'm sorry.

15 A Yes.

16 Q What opinions have you given Ken Beyer?

17 A Same line of logic as Dan Cool.

18 Q On Monday Ken Beyer made a statement about a Kalamazoo
19 County delegate -- I want to get this correct for the
20 record.

21 MR. THOMAS: Matt, I'm going to object
22 because you're going to get into something that's got
23 nothing to do with our case. Unless you can put a
24 reason on the record why this is relevant to our case
25 I --

1 BY MR. DEPERNO:

2 Q Ken Beyer stated on Monday -- he referred to a
3 Kalamazoo County delegate as the missionary position
4 Tamara Mitchell. When I asked him what he meant by
5 that he stated -- he said, I'm saying that she should
6 call herself a missionary, and the only way that she
7 could say that she is a missionary is if she were on
8 her back with her legs spread.

9 Is that a --

10 MR. THOMAS: Objection --

11 BY MR. DEPERNO:

12 Q -- is that a statement that you support?

13 MR. THOMAS: Objection. It's not relevant to
14 our case. It's outside the parameters of the case.
15 It's outside of what the judge told you to talk about.
16 You're talking about a fourth district guy that has
17 nothing to do with this case. He's already testified
18 and told you point blank what his opinion is as to that
19 and it's not relevant. It's not relevant to this case.

20 BY MR. DEPERNO:

21 Q As the chief of staff and as the so-called expert that
22 Jimmy has called to --

23 MR. THOMAS: I didn't ever call him an expert
24 so don't mischaracterize what I've said.

25 BY MR. DEPERNO:

1 Q So as the chief of staff for MIGOP, do you support Ken
2 Beyer's statement as he made regarding Tamara Mitchell?

3 A I will answer as a Christian and as a person of
4 integrity, I do not support that statement.

5 Q Have you asked Ken Beyer to resign yet?

6 MR. THOMAS: Objection. Again --

7 THE WITNESS: What do you mean by yet?

8 MR. THOMAS: -- objection. And I -- again,
9 Matt, you're outside the boundaries. Why -- why are
10 you outside the boundaries of what the judge told you?
11 Do you just not care what the judge says? Do you not
12 care? Put it on the record. Do you not care that the
13 judge told you not to go outside the parameters?

14 MR. DEPERNO: I think I'm well within the
15 parameters of talking about the witness's
16 qualifications as the chief of staff for MIGOP.

17 THE WITNESS: I saw your letter that you
18 wrote.

19 BY MR. DEPERNO:

20 Q Oh, good.

21 A It was full of false statements, contradictions, and
22 lies so I'm not going to answer. And then you -- you
23 just asked a leading question by putting the word "yet"
24 on the end. So fix your question or we're going to
25 have a problem.

1 Q Well, that would be an objection that -- that your
2 attorney could make.

3 A I don't have an attorney here.

4 MR. THOMAS: I'm not -- I put that on the
5 record as well.

6 (Indiscernible crosstalk.)

7 THE COURT REPORTER: One at a time. One at a
8 time, please.

9 MR. DEPERNO: Stop yelling, Jimmy.

10 MR. THOMAS: I'm not yelling.

11 BY MR. DEPERNO:

12 Q So as the chief of staff --

13 A Why do you keep asking as the chief of staff?

14 Q -- because that's your role. You are a chief of staff
15 for the MIGOP. So as the chief of staff, in that
16 capacity, you've testified that you manage HR for the
17 MIGOP.

18 A So you need to understand management.

19 Q Yeah.

20 A You clearly don't.

21 Q Okay. So as a manager of the MIGOP chief of staff,
22 what would you do if an employee of the MIGOP made a
23 statement about a female delegate that -- the same
24 statement that Ken Beyer made. What would you do about
25 it?

1 MR. THOMAS: Again, objection. It's
2 speculation. It's not anything to do this case, Matt.
3 Can we not -- I mean, why are you going into this?

4 MR. DEPERNO: It has everything to do with
5 this case because it talks about his qualifications.

6 MR. THOMAS: It's got nothing to do with this
7 case.

8 MR. DEPERNO: His management qualifications.
9 He's the guy that's going to be called to testify --

10 MR. THOMAS: Management qualifications --

11 THE WITNESS: What do my management
12 qualifications have to do with this case?

13 MR. DEPERNO: It has everything to do with
14 this case.

15 THE WITNESS: Why specifically? You can't
16 just say everything. What specifically?

17 MR. DEPERNO: I'm not here to get in a debate
18 with you.

19 THE WITNESS: You are. You're doing it.

20 MR. DEPERNO: I'm here to ask you questions.
21 You are trying to debate me.

22 THE WITNESS: Your questions are leading.

23 MR. DEPERNO: Well, then your attorney can
24 object.

25 THE WITNESS: I don't have an attorney here.

1 MR. DEPERNO: You can object to a leading
2 question, and I can try to rephrase --

3 THE WITNESS: Then go ahead and rephrase it.

4 MR. DEPERNO: Okay.

5 THE WITNESS: It's a leading question. Go
6 ahead.

7 BY MR. DEPERNO:

8 Q Is Ken Beyers' statement regarding Tamara Mitchell an
9 appropriate statement to make --

10 MR. THOMAS: Objection. That's a leading
11 question. It's yes or no.

12 BY MR. DEPERNO:

13 Q Is it appropriate, yes or no?

14 A I already answered that.

15 MR. THOMAS: He did. It's asked and answered
16 already.

17 BY MR. DEPERNO:

18 Q Okay. If it's not appropriate, then as the MIGOP chief
19 of staff why would you not ask the fourth district
20 chair to resign?

21 A Because districts are autonomous from state party. As
22 are counties autonomous from districts from state party
23 so I don't have the right to do that. I could do it as
24 a friend, but I don't have the right to do that as part
25 of MIGOP.

1 Q Have you -- have you advised him to resign as a friend?

2 A That's between me and him. You don't get to ask me
3 that question.

4 Q Of course I do.

5 A No, you don't.

6 Q So are you refusing to answer that question also?

7 A I don't have to answer questions about what I tell
8 somebody as a friend. Are you going to start asking
9 what I talk to my wife about at night?

10 Q No, that would be completely inappropriate.

11 A So is what you're asking right now.

12 Q So I can ask Ken Beyer or I can ask you what you talked
13 to Ken Beyer about. That is a completely appropriate
14 question.

15 MR. THOMAS: It's not an appropriate question
16 because it's outside the parameters of our case. What
17 does it have to do with our case, the facts in this
18 case?

19 MR. DEPERNO: It has to do with his -- his
20 inability to --

21 MR. THOMAS: You want it to. You would like
22 it to because you want information. You would like it
23 to, but it's got nothing to do -- for whatever your
24 future endeavors are, Matt -- nothing to do with this
25 case.

1 MR. DEPERNO: It's not about me. It is about
2 the witness being --

3 MR. THOMAS: You can say that to yourself all
4 you want. We all -- everybody knows what's going on.
5 All right? Everybody knows.

6 BY MR. DEPERNO:

7 Q John Smith is the fifth district chair. Have you given
8 him any opinions?

9 A No.

10 Q Hima is the 6th district chair. Have you given her any
11 opinion?

12 A No.

13 Q Dan Wholihan is the chair of the 7th district. Have
14 you given him any opinions?

15 A No.

16 Q Anne DeLisle is the 8th district chair. Have you given
17 her any opinions?

18 A No.

19 Q Warren Carpenter is the 9th district chair. Have you
20 given him any opinions?

21 A Yes.

22 Q What opinions have you given Warren Carpenter?

23 A It was just personal chitchat at a few events. Barely
24 even politically related, and I don't remember any of
25 the content. I don't remember it very well.

1 Q Barb Zinner is the 10th district chair. Have you given
2 her any opinions?

3 A No.

4 Q William Rauwerdink is the 11th district chair. Have
5 you given him any opinions?

6 A No.

7 Q Jessica Toth is the 12th district chair. Have you
8 given her any opinions?

9 A No.

10 Q Cheryl Costantino is the 13th district chair. Have you
11 given her any opinions?

12 A Yes.

13 Q What opinions have you given her?

14 A The same answer as Warren Carpenter.

15 Q Now let's go back to the 1st district chair again, Sue
16 Allor. Have you given her any advice regarding the way
17 she runs the 1st district?

18 A No.

19 Q Have you given Andy Sebolt any advice regarding the way
20 he runs the 2nd district?

21 A No.

22 Q And Dan Cool any advice the way he runs the 3rd
23 district?

24 A Yes.

25 Q What advice have you given Dan Cool on how he runs the

1 3rd district?

2 A The same answer as the party answer. It's generic and
3 it's in relation to how -- what the party looks like,
4 the Constitution platform.

5 Q Ken Beyer is the 4th district chair --

6 A Same answer as Dan Cool. All the rest are going to be
7 no.

8 Q I'm going to hand you what's going to be Exhibit 3 as
9 part of this record. It's going to be your text
10 messages with the plaintiff in this case, Sabrina
11 Pritchett-Evans. They have page numbers at the bottom.
12 Do you see that?

13 A Uh-huh.

14 Q Page 2 at the top seems to relate to a text message
15 that Ms. Sabrina Pritchett-Evans sent regarding
16 Kalamazoo, and you respond -- you say, or better yet,
17 start following the law and conservative principles in
18 their actions.

19 What is it about that text message that you
20 believe does not follow the law?

21 A No clue. You're asking me to go back to February. I
22 don't even know what this is about.

23 Q Well, you can read it and get an understanding of what
24 it was about.

25 A Okay. Give me a minute.

1 Okay. So what's your question again?

2 Q You state, quote, or better yet, start following the
3 law and conservative principles in their actions, end
4 quote.

5 What do you mean by better start following the
6 law?

7 A This is out of context. I don't know what I meant by
8 that.

9 Q Do you know what you meant by following conservative
10 principles in their actions?

11 A I would assume the same thing I've been answering all
12 along, the Constitution and the party platform, but,
13 again, this is out of context. I don't remember this.
14 I would need to see more context.

15 Q On page 5 at the top there's a discussion regarding
16 Huizenga and Hall team, and Sabrina Pritchett-Evan says
17 the text message was to sow discord and you said
18 absolutely.

19 A You didn't give me page 5. I have 3, 4 and it goes to
20 7.

21 Q I'll give you this package. At the top you see where
22 Ms. Pritchett-Evans is talking about Huizenga and Hall?
23 Talking about the text message was to sow discord, and
24 you say absolutely.

25 Can you explain what the Huizenga and Hall team

1 have to do with sowing discord?

2 A Nope. No. I don't know what this is about.

3 Q Sabrina Pritchett-Evans then says, I figured it out a
4 while back. Huizenga feels like he has lost control of
5 his own party. He is trying to build alliances outside
6 of Ottawa to go against Ottawa, and you say absolutely
7 on Huizenga.

8 What do you mean by that? So what are you
9 referencing here?

10 A I'm referencing Sabrina's text.

11 Q And what do you mean absolutely on Huizenga?

12 A That I -- currently I agreed with Sabrina's text.

13 Q You think Huizenga has lost control of his own county?

14 A Our county used to be one district, and it was the
15 district that he -- I don't know the district number --
16 but he was the -- the rep to DC out of that district.
17 With redistricting -- with the redistricting our county
18 is split, and he doesn't have control of it like he
19 used to. Everybody knows that. That's common
20 knowledge.

21 Q Do you think that Representative Huizenga was behind
22 the lawsuit in Ottawa County?

23 A I don't know.

24 Q Well, you say that. You say we believe he was behind
25 the lawsuit in Ottawa, and actively trying to undermine

1 us.

2 A Right, belief. Do I have proof? No.

3 Belief. I can believe whatever I want.

4 Q Why did you believe that Representative Huizenga was
5 trying to undermine Ottawa County?

6 A I could believe it just because I felt like it.

7 Q Well, I'm asking you why did he believe?

8 A I don't remember. It's been six months.

9 Q You then ask, may I get the name of the Ottawa -- the
10 attorney Ottawa used and you say are you suing, and
11 then you say our attorney was just okay.

12 Who are you referring to there?

13 A Jimmy.

14 Q Jimmy was just okay?

15 A Yeah, he was pretty new. We all had a lot of
16 challenges. I think he would admit that, but that was
17 my opinion.

18 Q On page 6 there you say all designed to waste time and
19 money.

20 What do you think was designed to waste time and
21 money?

22 A I have no idea.

23 Q You think the Ottawa County lawsuit was a waste of time
24 and money?

25 A Absolutely.

1 Q Why do you think that would be a waste of time and
2 money?

3 A I think you said it earlier. Don't you think that was
4 unfair to the new executive committee? Because it was
5 unfair to the new executive committee.

6 Q Page 7 at the bottom you say, we used parliamentary
7 procedures to our advantage. Probably should have
8 changed the rules for everyone.

9 What rules do you think you should have changed
10 for everyone?

11 A I'm on record on this one. This is in an email that
12 went out yesterday. There's -- that's easy.

13 Q Okay.

14 A I believe that the way that Kalamazoo was handled at
15 the D-4 district convention should have been the way
16 everybody was operated, but I also am on record stating
17 that the -- at a convention that the delegation has the
18 right to ultimately set the rules, and the job of
19 whoever is reading the rules to the convention is
20 simply to propose the rules. The delegates by
21 two-thirds majority according to Robert's Rules can
22 accept, deny, or amend the rules. And I was on
23 record -- I was on the chair call that both of them
24 were on, and I said I actually believe that everyone
25 should operate the way that Kalamazoo ultimately ended

1 up operating. But I advised on that call with the other
2 six chairs of the county and Shawn Calder (sp) that's
3 how the meeting should be run.

4 However, the delegates chose not to vote for the
5 rules that way. They voted for the rules the way they
6 did, and that's their right.

7 Q So you believe that Kalamazoo County should not have
8 been singled out, and had Rule 9 set aside only for
9 Kalamazoo County?

10 A If I would have had my personal wish, all counties
11 would have had Rule 9 set aside.

12 Q Do you believe that, setting aside Rule 9 only for
13 Kalamazoo disenfranchised delegates in Kalamazoo
14 County?

15 A No.

16 Q Why not?

17 A Because I believe that's what should have happened for
18 all the counties. I actually believe the other five
19 counties were disenfranchised because they voted to
20 have representatives go to the district convention and
21 elect the district committee, and they were not allowed
22 to do that in the way that the system is designed to do
23 it in the form of a constitutional republic and a
24 representative democracy by which our party should try
25 to replicate what our government and our nation is

1 founded as.

2 Q So if --

3 A I think Kalamazoo is the only one that did it right to
4 be honest.

5 Q -- did you make that objection at the District 4 caucus
6 on February 17th?

7 A I did not.

8 Q Why not? Why didn't you stand up for Kalamazoo --

9 A Because I had already been told that Allegan County
10 would vote against it so I knew it was pointless.

11 Q But do you think it might have been helpful to make
12 that objection on the record?

13 A No. Because all the other chairs were against me on
14 that. They made that clear. I knew that they would
15 influence their counties differently.

16 Q You've donated money to this lawsuit, correct?

17 A Which lawsuit?

18 Q This current lawsuit.

19 A Yes.

20 Q How much money have you donated?

21 A I don't remember.

22 Q Why did you decide to put your money behind the
23 plaintiffs in this case?

24 A Because I believe that what -- I believe in the
25 plaintiffs' side of the case.

1 Q Okay. Do you believe that we should involve court
2 systems within our inter-party disputes?

3 A I believe there's a time and a place for that.

4 Q And when is the time and place?

5 A That's my subjective opinion. I mean, I can conjecture
6 on it all day long if you'd like but...

7 Q Why do you think this case in particular would require
8 courts to intervene?

9 A So my opinion, at the time when I donated the money was
10 that this case, and specifically this lawsuit in terms
11 of dealing with the improper procedures and improper
12 decisions that were made in Kalamazoo was appropriate.
13 I may have -- that was my opinion at the time that I
14 donated.

15 Q Has your opinion changed?

16 A Yes.

17 Q What's your opinion now?

18 A I think the best answer -- again, lawsuits can have
19 their place, but I think the best answer is that the
20 Kalamazoo delegates should take care of their business.
21 I'm already on record on that too.

22 Q This is Exhibit 4. This is the 4th district agenda and
23 the rules. Now the rules are page 2 and 3. You were
24 part of the group of county chairs that agreed to these
25 rules, correct?

1 A I was part of the group of county chairs that met three
2 times to build these rules. I did not vote on them
3 because I left the third meeting with the final vote to
4 approve it.

5 Q Did you have a problem with these rules?

6 A Yes.

7 Q What was the problem you had with the rules?

8 A I wrote different rules. I submitted them to the
9 group. They didn't like them. Charley wrote these
10 rules, and we objected to things the best that we
11 could, or I objected to the things that -- the best
12 that I could representing Ottawa County, and got some
13 things changed. But in my opinion they're
14 insufficient, and these rules were designed to allow
15 counties to select their members prior to the
16 convention, and I disagreed with that.

17 Q Was there anything about Rule 9 in particular that you
18 were opposed to?

19 A I'll go back and read it.

20 So the sentence that -- what was the name, Thomas
21 Belch (sp) -- that he struck, I definitely disagreed
22 with.

23 The district delegation shall accept its final of
24 each county's nominees. Again, I stated earlier,
25 delegations ultimately hold the authority in a

1 convention, the entire delegation. So saying that each
2 county's nominees are final and the district -- the
3 delegation doesn't have any say in that. I disagree
4 with that.

5 As for the rest of it, again, it's an okay rule
6 aside from that, but I think the -- it was not the best
7 rule by far. There was a lot better options in this,
8 and I liked the ones I wrote. I'm biased of the ones
9 that I wrote.

10 Q Do you believe that county chairs would have the sole
11 authority under Rule 9 to select the nominees for their
12 county?

13 A I think you're combining two things and leading --
14 asking a leading question.

15 Q Okay.

16 A I'll break it down for you this way. According to Rule
17 9, the right thing to do, if everybody was operating
18 with integrity, would be counties go to their little
19 groups, pick their people, come back, and the chair
20 announces whatever happened whether they like it --
21 whether they agree with it or not. Under Rule 9,
22 technically, it says county chairs will announce their
23 nominees to the district delegation at large. If the
24 county chair were to go and lie and name off the names
25 of the people they liked, other than a bunch of

1 screaming and shouting, it says the district delegation
2 shall accept as final each county's nominees, which is
3 prefaced by the county chair announcing it.

4 That's why Ballard had that -- Thomas Belch had
5 that removed because the county chair doesn't have the
6 final say. The delegation does.

7 So in a worst-case scenario, unless the delegation
8 did something about it, technically, according to this
9 rule, without objection by the delegation, yeah, a
10 county chair could have announced and that would have
11 been final. And it could have been in opposition to
12 what their own county voted. Much less in opposition
13 to what the overall delegation would like.

14 Q So your rule that you're reading, the first sentence of
15 paragraph 2, the word there, you're reading that word
16 there to modify or reference the term "county chairs,"
17 and you're reading in a way where you're saying the
18 county chair could ignore their county vote in their
19 caucus, and simply select someone they want which goes
20 against the county delegates choice; is that right?

21 A I'm saying that technically could happen.

22 Q Was there any evidence that would happen?

23 A I'm telling you what my opinion was at the time when we
24 were all meeting to build these rules. I'm trying to
25 think of everything that could happen from good to bad,

1 and make sure that we write rules that give the
2 delegates the best chance -- the delegation who's
3 supposed to be voting at that convention, the best
4 chance to make the right decisions, and that the final
5 decisions are that of the delegation. So why wouldn't
6 I think of worst-case scenario and try to make it
7 better? That's worst-case scenario. I'm not saying it
8 was going to happen. I didn't know whether it would
9 happen. I said I was considering worst-case scenario,
10 and I thought I had better rules than these. But some
11 people complain that four pages is too much to read.
12 Apparently, they think the delegates are stupid.

13 Q Do you think courts have the ability to intervene in
14 party politics?

15 A You're going to have to give me more specifics.

16 Q Well, this case, for instance.

17 A If you're -- you're aiming at Heitmanis and that's --

18 Q Well, I think --

19 A -- I think I know what you're doing.

20 Q I think we'll get there. Sure. I'm building up to --

21 A Of course you are.

22 Q -- so, I mean, in terms of court intervention in party
23 politics, do you believe that courts have jurisdiction
24 to get involved in party politics?

25 A I don't know that my belief is -- has any relevance. I

1 know what -- I know what -- I know the limited
2 knowledge that I have of the law. I know the limited
3 knowledge that I have of the hierarchy of law and --
4 but my opinion on that is irrelevant. Courts are going
5 to rule and parties are going to act, and there's cases
6 where they've intervened and cases where they haven't.
7 There's cases where it's gone well. There's cases
8 where it hasn't. So I don't know where you're -- I
9 know what you're trying to get with this because you're
10 going go to Heitmanis and you're going to make some
11 claims so...

12 Q Well, what about -- I mean, you think it's wise for
13 political parties to allow courts to intervene in their
14 disputes?

15 A That's a better question. I think that -- it depends
16 on the scenario. I mean, you're just asking a very
17 generic question so give me an example.

18 Q Well, this case, for instance. This case --

19 A I've already stated that I think it would be best --
20 you know, good, better, best. It would be best for the
21 Kalamazoo delegates to handle their own business
22 outside of the courts. So in this case, no, I don't
23 think that's the best solution.

24 Q Do you think the time and energy put into this case,
25 and the money put into this case would be better spent

1 fighting Democrats?

2 A I think, again, you're combining two things causing a
3 leading question. So I'm going to separate it out for
4 you.

5 So specific to this case, again, I think we should
6 solve it in a best-case scenario by working it through
7 the delegates in Kalamazoo to handle their business.

8 To answer the second part of your leading
9 question. I think the party needs to figure out who it
10 is and what it is before it can find Democrats because
11 we clearly don't have that figured out. You ran on
12 that as attorney general.

13 Q Well, we're -- we're in the party. I mean, all the way
14 from the top down it seems to me we're arguing about
15 each other, fighting each other, and the Democrats are
16 dropping felony charges on people. That seems like a
17 bad strategy. Do you agree?

18 A I disagree with your premise. You said as a party, and
19 baked into your statement "as a party" is your
20 assumption that everybody with an R by their name is a
21 real Republican. I would disagree with that.

22 Q Yeah, I don't make that assumption.

23 A You did in your -- that's -- that's baked into your
24 statement. So this contradicts what you ran for on
25 attorney general when I supported you. All your

1 actions that you've taken since are in opposition to
2 what you ran on.

3 Q Well, it's not about me.

4 A Again, you keep saying that, but the evidence is in
5 opposition to what you're saying.

6 Q Do you know why the state party chair has not responded
7 to letters sent by Kalamazoo County GOP regarding this
8 very issue?

9 A I do not.

10 Q Do you think the state party chair should intervene in
11 this issue in this case?

12 A In what way?

13 Q Well, number one, would she have the authority?
14 Second, if she did have the authority, would it be wise
15 or would you advise her to get involved in inter-party
16 political disputes --

17 MR. THOMAS: I'm going to --

18 MR. DEPERNO: -- in the county?

19 MR. THOMAS: -- I'm going to object. You
20 need to break it down. You've asked three different
21 questions in one question. So if you're going to ask
22 that question break it down individually into --

23 BY MR. DEPERNO:

24 Q Well, first, would the state party chair have the
25 authority to intervene within this case specifically or

1 within -- disputes within county Republican parties?

2 A Intervene in what way?

3 Q Intervene through some type of declaration. Some type
4 of opinion. Intervene in any way.

5 A Again, you're asking a generic leading question so I'm
6 going to give you my best answer given that this is a
7 garbage question. She has very limited ability to
8 intervene because, as I stated earlier, legally the
9 county, the district, and the state parties are
10 autonomous. So her ability to intervene is extremely
11 limited, if at all.

12 Q So the second question would be if she had the ability
13 at all would it be wise even to intervene?

14 MR. THOMAS: I'm going to object because he
15 just said she doesn't have the ability. You're --
16 you're --

17 MR. DEPERNO: No, he said limited. He
18 qualified it as limited.

19 BY MR. DEPERNO:

20 Q So would it be wise?

21 A It depends on the -- the context.

22 Q Well, was it wise for Ron Weiser to get involved in
23 Macomb County dispute?

24 A He had no choice. You're bringing up the scenario in
25 which that limited ability to intervene connects, which

1 is where county district and state parties come
2 together at something like a state convention. The
3 state party makes rules to accept somebody from a
4 county through a district to a state convention.

5 If there's two factions claiming to be the
6 faction, the state party has got to pick somebody to
7 allow. I may or may not agree with who he picked, but
8 he -- the state party had to -- had to allow one
9 faction or the other from Macomb to represent Macomb,
10 or none. They could have chosen I guess none. They
11 had to make a choice, right? They can't -- they can't
12 allow both. Can't double up on Macomb.

13 Q On page 16 at the bottom you say, Kelly/Charley think
14 they own the party, and get to do whatever they want.
15 Why is -- why was that your opinion?

16 A Well, I don't see in context here, but it's pretty
17 simply the reason why we're here today.

18 Q Okay. Explain it.

19 A She has operated as a dictator.

20 Q Explain what you mean by that.

21 A She doesn't get to write letters by the power vested in
22 me to take out delegates. There's one solution to that
23 and it's called a recall election. They're elected by
24 the people. She has no power vested in her whatsoever.

25 Q What state law permits a recall of a delegate?

1 A That's irrelevant.

2 Q No, it's very relevant actually.

3 A I don't -- I don't know. I don't have a state law.

4 Q Does the Constitution -- Michigan Constitution permit
5 recall of a delegate?

6 A Don't know. Doesn't matter.

7 Q It does matter actually.

8 A It doesn't.

9 Q It's actually very relevant in this case.

10 A Because something doesn't exist doesn't give you the
11 right to do something else. You should know that as a
12 lawyer.

13 Q Well, just --

14 A You can't by -- by negative inference claim that she
15 has the right to take some action. That's complete and
16 utter bullcrap.

17 Q Do county parties have the right to control their party
18 membership?

19 A That depends on how they're set up.

20 Q Okay. Does the Kalamazoo County party have a right to
21 control its membership?

22 A I don't know how they're set up.

23 Q Okay.

24 A But you're not asking a relevant question because
25 that's not the statement that I just made. You should

1 be asking does the chair have the right to control the
2 membership, and the answer is no.

3 Q Well, the chair works at the request of the executive
4 committee and the delegates, correct? In a roundabout
5 way the delegates elect the executive committee, which
6 elects the chair --

7 A Uh-huh.

8 Q -- and so the chair works at the direction of the
9 executive committee.

10 A And the delegates.

11 Q Well, indirectly, yes.

12 A No, directly.

13 Q Not directly --

14 A Yes, directly.

15 Q No --

16 MR. THOMAS: I'm going to object. You're
17 debating him. Ask a question, Matt.

18 BY MR. DEPERNO:

19 Q So does the chair through the executive committee have
20 the right to remove delegates?

21 A Absolutely not.

22 Q And what do you base that at?

23 A Because delegates are elected positions.

24 Q Elected by --

25 A Does an individual -- does the governor have the right

1 to remove a representative from the state -- from the
2 house?

3 Q Well, no, certainly not.

4 A Same thing.

5 Q We're talking about completely different things.

6 A No, we're not. So we're talking about the citizens
7 elect a position. There's no individual that has the
8 right to remove them from that position.

9 Q So who elects a delegate?

10 A The citizens of their precinct.

11 Q What citizens?

12 A The citizens of the precinct.

13 Q All citizens?

14 A Yeah. We don't have party affiliation on our primary
15 elections. You should know that. Democrats can cross
16 over and vote so how do I know which citizens. All
17 citizens.

18 Q Okay.

19 A All the ones that vote on the Republican side of the
20 ballot on the -- during the primary.

21 Q Has a delegate ever been removed by a county party in
22 Michigan in the last 30 years?

23 A I don't know. Well, yeah, in Kalamazoo. They tried
24 to. It failed properly.

25 Q How did they fail?

1 A Because the county clerk said I'm not going to do that.

2 Q When did the county clerk say that?

3 A You know, you have all the documentation. I don't have
4 the dates.

5 Q When did the -- what -- what specifically did the
6 county clerk say --

7 A You know exactly what they said.

8 Q -- well, I'm asking you. You made the statement. What
9 did the county clerk say in that regard?

10 A She doesn't have the power to say by the power vested
11 in me you're no longer a delegate, and I'm not going to
12 remove them. We've never removed one in Kalamazoo in
13 all the years that I've been here.

14 Q You're telling me that the county clerk said that the
15 party chair doesn't have the ability?

16 A I'm telling you that's how I perceived what I read, and
17 it's been a while.

18 Q I hand you --

19 A A few months.

20 Q -- so I'll hand you this letter. You can tell me
21 exactly in there where the county clerk made that
22 statement. Or more appropriately, the attorney for the
23 county clerk.

24 A The clerk's office has no role in the removal of a
25 precinct delegate beyond what is provided for in state

1 statute, which was communicated to you and Ms. Sackett
2 during the March 8, 2023, meeting. The clerk's office
3 as such referred to you and Ms. Sackett to the Michigan
4 Republican party, and the Kalamazoo County Republican
5 party bylaws and/or internal government documents. The
6 clerk's office also made it clear it is their position
7 that the removal of precinct delegate questions related
8 to such matters -- such action are matters of party
9 governance, and at this time the clerk's office
10 strongly reaffirms that position.

11 Q Okay. So the clerk is saying --

12 A The clerk has no -- they're not going to accept by the
13 power vested in me they're no longer a delegate. They
14 rejected that.

15 Q Okay. It's my understanding -- and let's see if you
16 agree with me -- the clerk's office is saying that we
17 have no role in removal of precinct delegates. We
18 refer you to the Michigan Republican Party and the
19 Kalamazoo County Republican Party bylaws and internal
20 government documents, and we make clear our position
21 that the removal of a delegate and questions related to
22 such actions are matters of party governance at this
23 time.

24 So the issue -- what she's saying is, it's not up
25 to me as a clerk whether you can remove a delegate.

1 It's up to party governance, correct?

2 A Where do you see party governance?

3 Q Well, the very last sentence right down there at the
4 end of the paragraph.

5 A Okay. So that paragraph is what she's saying, and then
6 you go to the bold paragraph below. This communication
7 shall serve as official notice, blah, blah, blah. Any
8 political party beyond the process provided for by
9 state statute relating to the role of the county clerk
10 with respect to precinct delegates. So they're taking
11 a hands-off approach.

12 They were asked to acknowledge that they were no
13 longer delegates, and they refused to acknowledge that
14 and kicked it back to the party. So the county clerk
15 still has these delegates on record as Republican
16 delegates, and they're not going to remove them.
17 That's what I get out of this.

18 Q Well, maybe we agree on that, but the question then is,
19 what is the clerk meaning when she says removal of a
20 delegate is a matter of party governance?

21 So the clerk's office has a hands-off approach. I
22 agree with that, as the clerk's office should in this
23 situation. I don't believe the clerk's office have a
24 role in this whatsoever.

25 A Or the process of the election of the delegates --

1 Q The process --

2 A -- in the first place.

3 Q -- being election, correct. So beyond that, what the
4 clerk's saying is, removal of a delegate is an issue of
5 party governance. She's saying look at your bylaws.
6 Look at internal governing documents. That's what
7 controls. Isn't that what she's saying?

8 A Yeah, that would make sense.

9 Q Okay. So when you say that the chair has no authority
10 then --

11 A Correct.

12 Q -- to do it --

13 A Correct.

14 Q -- you can't rely on the Court's opinion --

15 A That's one opinion.

16 Q -- well, she's saying go back to the party bylaws and
17 internal governing documents. It's a --

18 A Well, you're assuming that I'm relying on the clerk's
19 opinion, and that's one piece of the puzzle.

20 Q Okay.

21 MR. THOMAS: Did you just read in their
22 bylaws because she didn't say bylaws in that --

23 MR. DEPERNO: She did say bylaws.

24 MR. THOMAS: -- okay.

25 MR. DEPERNO: I'm not trying to trick anyone,

1 Jim.

2 MR. THOMAS: He's referring I think to Kevin
3 Swygert's (sp) emails is what he -- is what he was
4 talking about, and that's the clerk from the -- from
5 the other township that's --

6 THE WITNESS: That is what I'm referring to.

7 MR. THOMAS: -- that's probably what he's
8 referring to.

9 THE WITNESS: Because what I refer to is not
10 in here. So this document is not what I was referring
11 to.

12 BY MR. DEPERNO:

13 Q So what else would you rely on regarding removal of
14 delegates other than the clerk's statement?

15 A I would rely on the bylaws. I would rely on the law.
16 And at any length I will argue to the death per J.D.
17 Glaser's class that chairs are not dictators. They are
18 facilitators.

19 Decisions cannot be made by chairs. They can be
20 made by executive committees who represent the
21 delegates when the delegates are not in session. When
22 delegates are in session, executive committees have
23 zero authority, period. Delegates have the authority
24 ultimately, and they could exercise that authority any
25 time they want by calling a convention.

1 Q So what laws are you -- would you refer to that would
2 prevent a county party from removing a delegate?

3 A I don't have laws that I'm referring to. I'm just
4 stating a generic answer to your question of what I
5 would refer to if I were trying to solve something like
6 this. I didn't have to solve this in Ottawa. We
7 haven't removed any delegates.

8 Q What happens if you have Democrats who run as
9 Republican delegates and get elected, and then you have
10 Democrats who infiltrate the party with an R in front
11 of their name calling themselves Republicans --

12 A We have lots of that, yeah.

13 Q -- what do you do with that in Ottawa County? How do
14 you deal with those people as delegates?

15 A We just pass incorporation and new bylaws. We had no
16 recourse to deal with that in the past. We do not.

17 Q And what does your bylaws now allow you to do?

18 A To remove them if they are not real Republicans.

19 Q So there's a process you established in Ottawa County
20 to allow you to remove delegates?

21 A It's a brand new process.

22 Q Okay.

23 A And literally voted on this month.

24 Q Okay. And what is that process?

25 A I don't have it memorized right now.

1 Q So what is the standard you use to determine whether
2 someone's a real Republican?

3 A That is a great question. That still needs to be
4 developed, and I think should be published everywhere
5 because the Republican Party has failed with that.

6 Q Well, I'm not disagreeing with you so I'm --

7 A That's my answer to your question.

8 Q So the question then is, if you have people who
9 infiltrate the party --

10 A Uh-huh.

11 Q -- and you identify them as either Democrats or third
12 party people, you know, or anything else, anarchists,
13 for instance --

14 A Sure.

15 Q -- who come in and infiltrate and create chaos, and
16 then you go through your process to remove them, what's
17 the next step? How do you effectuate that removal?

18 A So you're removing them from the party. That would
19 never be done by a chair, ever.

20 Q Okay.

21 A That's a completely invalid step. So it's a party
22 decision. It would be done by a broader group of
23 folks, whether it's the executive committee or the
24 delegation in total -- again, I don't have the rules
25 memorized. I -- I don't have them memorized so I'm not

1 going to tell you -- sit here and tell you the details
2 of how Ottawa would do that.

3 Q Okay.

4 A I don't know the answer.

5 Q So I'm just trying to get to the issue of now that the
6 party -- you know, in this hypothetical -- has
7 determined that it's sniffed out an infiltrator within
8 the party --

9 A Uh-huh.

10 Q -- you remove them as a delegate. Do you send a letter
11 to the county clerk saying we removed this person as a
12 delegate?

13 A No.

14 Q You just do it internally?

15 A Correct.

16 Q Because we don't care what the clerk says one way or
17 the other, right?

18 A No. Because we can't legally ask the clerk to strike
19 them from the record as not being a Republican delegate
20 anymore.

21 Q So the clerk's office doesn't care. You -- maybe you
22 get that; maybe you don't. I don't know. Do you
23 understand that?

24 A Well, every clerk's office is different. Which clerk's
25 office are you talking about?

1 Q Any clerk, 83 counties in the state.

2 A They're not all the same.

3 Q Okay. So do you just not issue that delegate a call to
4 the next convention? You don't credential them?

5 A We haven't gone through this yet. You're asking me for
6 a hypothetical. I'm not going to -- I don't know.

7 Q Okay. I'm not trying to trick you on this. I'm just
8 trying to get your understanding --

9 A But you're asking for an answer to something that
10 hasn't occurred, and I don't have the bylaws memorized.
11 So I'm telling you I have no answer to your question.

12 Q Well, just so you understand, it's not a trick
13 question. I'm just -- I assumed you would have thought
14 through the process of what you do after you
15 actually --

16 A Other folks on our team have thought through that
17 process. I have been very busy and very focused on
18 MIGOP. I don't know the answer to your question.

19 Q Fair enough.

20 Do you know whether the Kalamazoo County Executive
21 Committee was in favor of the Kalamazoo County chair
22 removing delegates?

23 A No.

24 Q So then you don't know specifically that the Kalamazoo
25 County chair was acting as a dictator?

1 A I do.

2 Q Well, it's possible she wasn't. It's possible she was
3 acting with approval of the executive committee,
4 correct?

5 A Then the letter would have been written differently,
6 and it would have come from the committee, not from the
7 chair. And I don't know that even the executive
8 committee has the right delegates. That would depend
9 on what their bylaws say what is the process for
10 removing a delegate.

11 Q Page 20. In this conversation you're talking about
12 someone named Ben who appears to be -- work for the
13 Huizenga team. Sabrina Pritchett-Evans refers to him
14 as a flunky. Do you know Ben?

15 A Nope.

16 Q Then there's a discussion about Matt Hall. Do you see
17 that about midway down?

18 A Sure.

19 Q And you asked in Kalamazoo -- Matt from Kalamazoo, see
20 that?

21 A Yep.

22 Q You're referring to Matt Hall, correct?

23 A Yep.

24 Q And then you say definitely lots of swamp there. What
25 do you mean by swamp there?

1 A Fake Republicans.

2 Q And you think Matt Hall is a fake Republican?

3 A How is that relevant to this case?

4 Q Well, I'm just trying to understand the context of
5 what your message means. Is Matt Hall a fake --

6 A Are you going to publish it tomorrow like you published
7 Ken Beyer's stuff yesterday?

8 Q Is Matt Hall a fake Republican?

9 A I'll reserve that opinion to myself.

10 Q So you're going to refuse to answer that question too?

11 A Sure.

12 Q Why?

13 A Are you going to ask me every other state rep and state
14 senator whether I think they're swamp or not?

15 Q No. Well, just strictly Matt Hall because that's the
16 conversation in the text messages.

17 A Right. Because you're leading to a conclusion that as
18 chief of staff of the Republican Party I shouldn't be
19 doing X, Y, and Z, and you're going to go publish it
20 tomorrow.

21 Q Well, do you think as chief of staff of the Republican
22 Party --

23 A I think we should sort out who's a real Republican and
24 who's not. We should define what a real Republican is
25 and what isn't so that we can actually support real

1 Republicans. That's what the party should be about.

2 Q Have you had a conversation with Matt Hall about

3 whether he's a real Republican --

4 A No, I can look at his voting record.

5 Q -- and -- and do not make --

6 A And his statements and everything else.

7 Q -- what do you not like about his voting record?

8 A I don't have an answer to that right now.

9 Q What do you not like about his statements?

10 A I don't have an answer to that right now.

11 Q Sabrina Pritchett-Evans then says, I don't believe it's

12 Matt's girlfriend. I don't think he swings that way.

13 What does she mean by that?

14 A I don't know.

15 Q Well, then you put a ha-ha.

16 A I can laugh at stuff. I don't know what it means.

17 Q So you laughed at something you don't know what it

18 means? Is this in reference to Matt Hall's sexual

19 orientation?

20 A I don't know. You tell me.

21 Q Well, I'm asking.

22 A How do I know? It's not on the page.

23 Q Well, she's making the statement, and you're

24 laughing --

25 A Well, you could have asked her at her deposition.

1 Q Well, I'm asking you why you laughed at it.

2 A I can laugh at whatever I want.

3 Q Did you think it's funny?

4 A Apparently I did in the moment.

5 Q So you think in the moment that making a reference
6 above Matt Hall's sexual orientation is funny?

7 A I don't know. I'm not in that moment.

8 Q Well, you were in the moment.

9 A Great. I'm not now.

10 Q Do you think it's appropriate to make jokes about
11 people's sexual orientation?

12 A Have you ever made a joke about somebody's sexual
13 orientation?

14 Q Well, I'm asking you because you're the witness. So
15 have -- do you think it's appropriate to make jokes
16 about --

17 A I think you're questioning my First Amendment rights
18 right now.

19 Q I'm not saying anything about your --

20 A I think you are.

21 Q -- I think you as --

22 A I think you are challenging my First Amendment rights.

23 Q I think you can say whatever you want. I'm asking you
24 why you would have said something, which is far
25 different than somehow saying you're not permitted to

1 say something.

2 MR. THOMAS: Matt, let me look at what --

3 BY MR. DEPERNO:

4 Q So you think --

5 MR. THOMAS: -- one second. I want to object
6 right here. One second because I think you're talking
7 about something about swings? That's not a sexual
8 thing. How do you know what swings is exactly?

9 BY MR. DEPERNO:

10 Q And so you're --

11 A Why don't you define swings for us, and then I'll
12 answer the question.

13 Q Well, I'm asking you because --

14 MR. THOMAS: You're talking about sexual
15 orientation and swings. You know, I don't know what
16 swings means, and especially in the context of how
17 that's written. You better explain that because you're
18 now challenging him on a sexual preference. It doesn't
19 say anything about sex there unless you're assuming
20 swings means something sexual.

21 THE WITNESS: Yeah, you're assuming what it
22 means.

23 MR. DEPERNO: I'm asking you --

24 THE WITNESS: Maybe he's swinging on a swing
25 set. How do I know.

1 BY MR. DEPERNO:

2 Q So I'm asking you what you thought when you laughed at
3 it.

4 A I don't know. I'm not there. You're asking me to
5 remember my memories. Come on, move on.

6 Q Asking me to remember my memories?

7 A Yeah. My thought process in a moment from six months
8 ago. Ridiculous.

9 Q On page 26, there's a discussion -- it starts on page
10 25 actually. There's a discussion going on about the
11 Kalamazoo KGOP coffee in the morning, and March 17th at
12 2:55 Sabrina mentioned someone named Jason. Do you
13 know who Jason is?

14 A I assume he's somebody in the KGOP.

15 Q Did you know a Jason in the KGOP?

16 A No, I don't know a Jason personally in the KGOP. I
17 know of a Jason in the KGOP.

18 Q You know of a Jason?

19 A Yeah.

20 Q Is that Jason Mikkellborg?

21 A If he's the one that's on D-4 then, yeah.

22 Q Okay.

23 A I'm not 100 percent sure on his last name.

24 Q You say in 11/16 -- you said these people are insane.

25 A Where's that at?

1 Q Do you know what you're -- who you're referring to?

2 A I'm assuming it's the statement banned for life.

3 Q Okay. And who was banned for life?

4 A Probably whatever is in that tap to download image.

5 Q Do you recall what that was?

6 A No.

7 Q Are you still actively involved in Ottawa County GOP?

8 A Yes.

9 Q Is Ottawa County GOP taking steps to ensure that Bill
10 Huizenga wins re-election?

11 MR. THOMAS: Again, I'm going to object.
12 What does this have to do with our case?

13 MR. DEPERNO: I think it has to do
14 specifically with his role as county officer for Ottawa
15 County as chief of staff.

16 MR. THOMAS: What does that have to do with
17 our case? What issue of our case is in effect?

18 MR. DEPERNO: Well, it has to do a lot with
19 his role as the chair or the chief of staff. Has to do
20 specifically with his knowledge of party politics.
21 Precisely why he's been called as a witness.

22 MR. THOMAS: It's got nothing to do with it
23 and you know it.

24 MR. DEPERNO: Well, I think it has a lot to
25 do with --

1 MR. THOMAS: It's got nothing to do with it.

2 MR. DEPERNO: -- his understanding of the
3 role of district chairs, county chairs, his
4 understanding of how parties work. Absolutely total
5 relevance to this case.

6 MR. THOMAS: It's outside the parameters of
7 what the judge ordered.

8 BY MR. DEPERNO:

9 Q So what is -- what is Ottawa County doing to ensure
10 Bill Huizenga wins re-election?

11 A Right now Ottawa County is working on all things
12 Republican, and defining what a real Republican is, and
13 defining what the party platform is, and we're focused
14 on preparing for election season next year. We're not
15 focused on any specific candidates other than those
16 that are in distress, which currently is one county
17 commissioner who's being recalled -- or attempted to be
18 recalled by the Democrats.

19 Q What do you think are real Republicans?

20 A One that adheres to the platform in voting, and in
21 words, and in actions.

22 Q Who is Brendan (sp)?

23 A You're going to have to be more specific.

24 Q On page 29 you're talking about someone named Brendan.

25 A So Brendan is a new chair in Ottawa.

1 Q What's his last name?

2 A Muir.

3 Q How do you spell it?

4 A M-U-I-R.

5 Q Page 34 at the bottom on April 10 you say they can't
6 remove delegates. I take it from your earlier
7 statement that your opinion has changed on that?

8 A Well, I don't know. I don't know what their bylaws
9 say, and I don't know what their organizational
10 structure is, and I'm sure at that time I was probably
11 referring to the way that they remove them.

12 Q And what was your understanding as to the way they
13 remove?

14 A We've already been over this.

15 Q I'm handing you Exhibit 5.

16 A Are we done with the texting?

17 Q No, we'll come back to that.

18 Exhibit 5, on the second page, this is training
19 materials sent out by Kim Harris. One of the
20 plaintiffs in this case. She says in that first
21 paragraph -- she said, we are attempting to build a
22 precinct delegate force across our state to remove all
23 RINOs and their useless pawns from party leadership at
24 the county, district, and state committee levels.

25 Do you agree with that statement as a goal within

1 the Michigan Republican Party?

2 A I would rephrase it and say fake Republicans.

3 Q Do you believe that should be the focus of delegate
4 training?

5 A Of delegate training? What -- I don't understand your
6 question.

7 Q Well, in this context -- this was sent out as training
8 materials to a group of delegates, and you think that
9 should be the focus of training new delegates?

10 A Where are you going with this? What's your point?

11 Q I mean, is that -- is that what the party should be
12 focusing on when it trains new delegates? Should the
13 party be building a delegate force, the goal is to
14 remove RINOs and useless pawns, or as you say, fake
15 Republicans?

16 A I would -- I would state this in a positive sense and
17 say we need to define what a Republican is, and teach a
18 delegate what a Republican is. Just like when you
19 teach somebody currency and they're trying to identify
20 false currency, you teach them the real thing.

21 So I would state this. That we need to teach
22 delegates what a true real Republican is by training
23 them on the party platform, training them on the
24 Constitution, that way they're able to identify any
25 frauds be they Democrat or otherwise. That's how I

1 would state this.

2 Q How do you define America First?

3 A I don't.

4 Q Why not?

5 A I'm actually -- that's not a term that I throw around
6 so I don't have an answer to that. I know other people
7 do, but I don't.

8 Q Page 4 --

9 A These aren't numbered.

10 Q -- I know they're not numbered. That one right there.
11 Robin Peak (sp) is a ex-officio member of the
12 Republican state committee; is that correct?

13 A I believe so. I'm not sure.

14 Q In these messages -- these messages say -- she talks
15 about Muslims in a derogatory way. Would you agree
16 with that?

17 A No, I'm not -- I haven't read it yet.

18 Q Well, please read it then.

19 MR. THOMAS: Can you elaborate why we're
20 going into Robin Peak and Muslims for this case?

21 MR. DEPERNO: Yeah. It's an -- it's been an
22 exhibit --

23 MR. THOMAS: I know it's an exhibit, but why
24 in this deposition are we talking about this?

25 MR. DEPERNO: Well, it goes specifically into

1 your defamation claim. I can ask the witness -- he's
2 someone --

3 MR. THOMAS: He's not a witness to the
4 defamation. He's not a witness.

5 MR. DEPERNO: He's a witness as to your case.
6 You put him on your witnesses.

7 MR. THOMAS: Okay. All right, Matt.

8 THE WITNESS: Okay. What's your question?

9 BY MR. DEPERNO:

10 Q Do you agree that the statements made in here are
11 derogatory towards Muslims?

12 A I think that's subjective, and you're asking me to get
13 into Robin's head and determine what she's saying here
14 so I don't have an answer to that.

15 Q But on the face --

16 MR. THOMAS: Asked and answered. Objection.

17 BY MR. DEPERNO:

18 Q On its face --

19 MR. THOMAS: Objection. Asked and answered.

20 BY MR. DEPERNO:

21 Q -- on its face do you find her comments --

22 MR. THOMAS: Objection. Asked and answered.

23 MR. DEPERNO: -- I haven't asked this
24 question. Stop yelling. You need --

25 MR. THOMAS: I'm not yelling.

1 BY MR. DEPERNO:

2 Q -- so did you find her comments offensive?

3 A Same answer.

4 Q Is her comments the type of comments that are condoned
5 by the MIGOP -- you being the chief of staff, do you
6 condone these types of comments?

7 MR. THOMAS: Objection. Asked and answered.
8 He's already told you that he's not going to get inside
9 her head. That was the answer.

10 MR. DEPERNO: No, that's a different
11 question.

12 MR. THOMAS: It's not.

13 BY MR. DEPERNO:

14 Q As the chief of staff of MIGOP, do you condone these
15 comments?

16 A I'd have to read through these, process them, think
17 through it more. These are -- these are very generic.
18 There's context. You don't have the referred
19 information above so I'm not -- I don't have an answer
20 to your question right now.

21 Q So why hasn't MIGOP investigated these comments?
22 They've been widely distributed.

23 A This clearly is a telegram chat, right? Am I correct?

24 Q It looks like.

25 A You think that MIGOP should go out and investigate and

1 waste all their time on every telegram chat out there?

2 Q Well, I think if you have ex-officio members --

3 A Has this been brought to MIGOP's attention to
4 investigate?

5 Q Of course it has.

6 A By who?

7 Q Well, I don't know --

8 A Then you don't know that it's been brought.

9 Q -- I assume --

10 A You're lying to me.

11 Q -- I assume you guys --

12 A You're assuming. That's a lie. You just said of
13 course it has.

14 Q I assume you guys --

15 A You lied to me.

16 Q -- I assume you guys --

17 THE COURT REPORTER: Off the record for a
18 second.

19 (Break in proceeding from
20 12:29 p.m. to 12:29 p.m.)

21 BY MR. DEPERNO:

22 Q What is your opinion of Dan Hartman's statement when he
23 said it was crazy when Christians allowed non-Christian
24 voices into the marketplace of ideas?

25 MR. THOMAS: I'm going to object to those

1 questions. You don't have the complete record of that.
2 You read one blip of something that was stated. You
3 don't have the whole complete paragraph and content.
4 It's incomplete.

5 BY MR. DEPERNO:

6 Q Okay. So what was your opinion when you heard that?

7 A I never heard it.

8 Q You never heard that statement from Dan Hartman?

9 MR. THOMAS: Objection. Asked and answered.

10 MR. DEPERNO: Calm down and let the court
11 reporter --

12 MR. THOMAS: I'm objecting.

13 MR. DEPERNO: -- see, you're doing it again.

14 MR. THOMAS: Okay.

15 MR. DEPERNO: You've got to stop interrupting
16 everyone just because you get excited.

17 MR. THOMAS: I'm not excited.

18 MR. DEPERNO: You've got like these veins on
19 the side of your head popping out.

20 (Indiscernible crosstalk.)

21 MR. DEPERNO: -- PTSD. You wouldn't know
22 what that is, do you?

23 BY MR. DEPERNO:

24 Q You've -- so just to be clear, you are not aware that
25 Dan Hartman made comments as described in the news

1 article you're looking at right now?

2 MR. THOMAS: Objection. Asked and answered.
3 He says he was not familiar with it.

4 MR. DEPERNO: Now I clarified that in terms
5 of the article that he's now reading.

6 THE WITNESS: I'm now reading it. Before
7 this, I've heard that this happened. I have not heard
8 the exact quote, and I have read none of these articles
9 about it. That's a fact.

10 BY MR. DEPERNO:

11 Q As the chief of staff that does not concern you that
12 you didn't even investigate it?

13 MR. THOMAS: Objection. How is he supposed
14 to investigate something when he doesn't know about it?

15 MR. DEPERNO: No. He just -- he changed that
16 statement and said he --

17 BY MR. DEPERNO:

18 Q So you didn't even investigate this?

19 A You're saying I should have personally investigated it?

20 Q As the chief of staff, yes.

21 A That's your opinion. What's your question?

22 Q Why didn't you investigate it?

23 A You took my description of my job earlier. I'm very
24 focused on that. We've had a lot of hell to deal with
25 given to us by the previous administration. I can't do

1 everybody else's job too. What do you want me to do?

2 Q Well, you're in charge of HR you said.

3 A I oversee HR.

4 Q Okay. And HR would oversee Dan Hartman, correct?

5 A Incorrect. State party would.

6 Q Dan Hartman is a paid employee, correct?

7 A Incorrect. He's elected legal counsel for state party.

8 State party, specifically the policy committee, would

9 have more say in that than I would.

10 Q When did Dan Hartman -- when was he elected?

11 A April 15. Just like everybody else that was elected

12 after Kristina and Wanda (sp) were elected.

13 Q Go to this page. This is a flyer that's been

14 circulated and passed out in District 4, specifically

15 at District 4 executive committee meetings. Have you

16 seen this before?

17 A Nope.

18 Q Do you --

19 A Never seen this in my life.

20 Q -- do you agree and do you support the Doctrine of the

21 Lesser Magistrate?

22 MR. THOMAS: Objection. Why is this relevant

23 to him in this case?

24 MR. DEPERNO: It's just --

25 MR. THOMAS: Why?

1 MR. DEPERNO: -- specifically in District 4.

2 MR. THOMAS: So.

3 MR. DEPERNO: So it's very relevant in our
4 case.

5 MR. THOMAS: What's it relevant to? Because
6 they're going to be ousted out and based on your
7 letter? Is that what it's relevant to?

8 MR. DEPERNO: No, I'm asking the question.

9 MR. THOMAS: Are you trying -- what's --

10 MR. DEPERNO: It's particularly relevant.
11 We've referenced it in our answer and our beliefs.

12 MR. THOMAS: Nobody even knows what lesser
13 magistrate means except for you. You're probably the
14 one that wrote that.

15 BY MR. DEPERNO:

16 Q So do you agree with the Doctrine of the Lesser
17 Magistrate?

18 THE COURT REPORTER: I can't -- I can't hear.
19 You're crinkling papers and it's cutting out the
20 attorney.

21 THE WITNESS: Anywhere that it aligns with
22 the Constitution, yes, I agree with it.

23 BY MR. DEPERNO:

24 Q In what ways does it align with the Constitution?

25 A I don't know.

1 Q So you only agree with it when it aligns with the
2 Constitution, but you don't know how it aligns
3 with the --

4 MR. THOMAS: I'm going to object.
5 Have you seen this before?

6 THE WITNESS: I've never seen this.

7 MR. THOMAS: Do you know what the lesser
8 magistrate is?

9 THE WITNESS: Yeah, I know what that is. It
10 was written by Matt Trehwella. He did an event in
11 Ottawa and to whatever degree it aligns with the
12 Constitution I agree with it. Just like every other
13 book aside from the Bible. It's a generic statement.

14 BY MR. DEPERNO:

15 Q Have you studied the Doctrine of the Lesser Magistrate?

16 A No.

17 Q This is Exhibit 6. Do you know who Dave DeShaw is?

18 A Yes.

19 Q Do you have any animosity with Dave DeShaw?

20 A No.

21 Q In this first page you talk about Dave DeShaw's ability
22 to confuse. What do you mean by that in the top
23 paragraph?

24 A I made a motion, as I stated here, to set aside Rule 20
25 at the state convention on February 18, and his

1 response to it was very confusing to the delegation in
2 my opinion, along with the poor sound system.

3 Q Is it your -- on page 2 your belief is that there are
4 no rules approved at the beginning of the convention?

5 MR. THOMAS: I'm going to object. Is there a
6 reason why we're going into the February 18th
7 convention where you were on the ballot to be voted in?
8 Is there a reason for this, Matt, other than you
9 haven't conceded that race?

10 MR. DEPERNO: No. I was just talking about
11 his understanding of Robert's Rules and -- and
12 conventions in general. It's not about me, Jimmy.

13 THE WITNESS: What was the date of this post?

14 MR. THOMAS: I'm hoping the judge sees right
15 through you.

16 MR. DEPERNO: You've got those veins popping
17 up again.

18 THE WITNESS: Matt, what was the date of this
19 post?

20 BY MR. DEPERNO:

21 Q I'm not sure what the date of this post was. I assume
22 it's shortly after --

23 A After? Can we assume it's after?

24 Q -- yeah.

25 A Then I -- it should have said there were no rules

1 approved, not there are no rules. I'm not sure why I
2 said "are." It should have been past tense.

3 Q Okay.

4 A There was never a vote to approve the rules by the
5 delegation at the convention. That's what that means.

6 Q But doesn't the policy committee of state committee
7 approve the rules prior to the convention?

8 A They write the rules. They should propose them to the
9 convention according to Robert's Rules of Order, and
10 then the delegation at the convention should have a
11 vote whether to approve them, or to change them, or to
12 deny them altogether. That's how Robert's Rules works.

13 Same with the agenda, same with credentials, same
14 with electing the permanent chair of the convention.
15 None of which was done on February 18. Dave DeShaw
16 messed that up royally. Actually, it wasn't really his
17 fault. It's the rules committee that wrote the agenda
18 and the rules leading into that convention that made
19 the mistake, not Dave. But he defended it so it became
20 his mistake. Taught by J.D. Glaser in this class.

21 Q So you're saying it's -- you're saying the J.D.'s
22 teachings are counter to the way Dave DeShaw ran the
23 convention?

24 A Absolutely. And I spoke to J.D. personally about that
25 during the convention after the time at which the rules

1 and everything else had passed, and we were into the
2 election portions, and J.D. stated to me directly that
3 he agreed with me.

4 Q What is your understanding of MCL 168.599?

5 A Do you want me to read the whole thing to you and tell
6 you what I think about it? What do you mean by that?

7 Q Well, just generally what your understanding is of it.
8 Do you have knowledge of it?

9 A Absolutely.

10 Q Okay. When did you first start thinking about 168.599?

11 A When I was a delegate in Ottawa looking at what it
12 means to create an executive committee.

13 Q Let's go to this page if you can find it.

14 A In this packet?

15 Q Yeah.

16 A This one?

17 Q Yes.

18 A Okay.

19 Q You say that bylaws trump MCL.

20 A Where do I say that?

21 Q Right at the top there.

22 A Thomas teaches that. I disagree with that.

23 Q Oh, I see. You disagree with that?

24 A Absolutely.

25 Q You think the hierarchy as you lay it out is number

1 one, the Constitution; two, statutes; and, three, the
2 bylaws?

3 A Correct.

4 Q So it's your theory that the statute trumps the bylaws?

5 A Correct.

6 Q And you believe that to this day right now?

7 A Correct. That's in multiple law schools. One example
8 would be Florida A&M that has documentation of this
9 hierarchy, and I've been told this hierarchy by other
10 lawyers.

11 Q So if we get into a discussion about -- or if the
12 county chairs, the county executive committee, decides
13 to write bylaws to run its county party different than
14 set forth in 168.599, you think the bylaws would be
15 invalid?

16 A Correct.

17 Q So you believe then, according to 168.599, that county
18 parties must have an equal number of statutory members
19 and executive members?

20 A That's not what it says. It says nominees, not
21 statutory. It's called nominees in 168.599. Nominees
22 are elected in the primary. Then you must elect in
23 your county convention the same number of delegates as
24 were nominated in the primaries. It's a one-way
25 street.

1 Q So does that mean you get more elected members than
2 statutory members?

3 A No, you couldn't.

4 Q You couldn't --

5 A It literally says the delegates need to -- you have to
6 elect the same number -- so in Ottawa we had 24
7 nominees. We had to select as a delegate -- the group
8 of delegates or delegation at our convention on
9 December 1st, 24 people to be on the delegate side, the
10 elected side of the executive committee so that it
11 would be 48 people, meaning statutory number is set by
12 the election. That's the general -- the primary
13 election at 24. Therefore, we must match the 24
14 equaling 48.

15 Q And could you write bylaws that say you could have
16 two-thirds of the executive committee as elected
17 members, and one-third as statutory members?

18 A No.

19 Q How did the Democrats get away with that?

20 A I don't know anything about what the Democrats do, nor
21 do I care. Maybe somebody should file a lawsuit on
22 them. I didn't even know they did that.

23 Q Well, they did do that.

24 A Okay. Well, they're wrong. They're violating the law.

25 Q So that gets -- and their bylaws specifically say we

1 have -- they have two-thirds of their executive
2 committees are elected members and one-third are
3 statutory.

4 MR. THOMAS: Is that a question?

5 MR. DEPERNO: Well, I was just trying to give
6 him some --

7 MR. THOMAS: Well, ask him a question,
8 please.

9 MR. DEPERNO: That's not a question. I was
10 just giving him some --

11 MR. THOMAS: He doesn't -- you don't need to
12 inform him of that. You ask questions. That's what
13 we're here for.

14 MR. DEPERNO: No offense, Jimmy.

15 BY MR. DEPERNO:

16 Q So that gets us into the discussion about Heitmanis
17 because Heitmanis ruled that -- that requirement of an
18 equal number was unconstitutional. Do you agree with
19 that?

20 A I haven't read the entire case in five years so I'm not
21 going to answer whether I agree with it or not. What I
22 can tell you is that I looked through the law, and I
23 see that when laws are deemed unconstitutional there's
24 a process for that, and they're either redacted or
25 whatever the word is when you go to a law and it's just

1 gone, and it says -- it starts with an R. It's not
2 redacted. Different word. Repealed. Repealed. So
3 there's a process for changing something to not be
4 constitutional where it's no longer on the books. So
5 as far as I'm concerned, as a non-lawyer who can read a
6 law website and read this hierarchy, it's still a
7 statute. Is not MCL 168.599 still a statute?

8 Q So let's go to this page here. It talks -- there's
9 this -- see what page it is --

10 A The answer is yes. It's still a statute.

11 This one here?

12 Q No, it's past that.

13 A I'm past it or --

14 Q No, keep going.

15 Okay, that one.

16 This looks like a discussion you were having with
17 Kelly Sackett, and she says the bylaws do trump the
18 MCL, and you say false.

19 A Uh-huh.

20 Q Heitmanis from 1988 proves the opposite.

21 A Because I've read two other lawyers opinions on the
22 results of Heitmanis, and they were in opposition to
23 what she claimed.

24 Q Okay. So you say -- let me ask the question.

25 Why -- so why do you say Heitmanis v Austin from

1 1988 proves the --

2 A Because I trust the lawyers who wrote the opinions that
3 I read.

4 Q Who are the lawyers that wrote the opinions?

5 A Dan Hartman and another lawyer out of Ottawa County.

6 Q Named?

7 A I'm blanking on his name right now. It's been a while.

8 Q Then you say just because the MIGOP keeps saying it
9 doesn't make it true, and then you say we had to fight
10 this with the rigid lawsuit in Ottawa.

11 A Rigged.

12 Q Rigged, I'm sorry. Did -- was Heitmanis brought up as
13 an issue in the Ottawa case?

14 A It was brought up in passing. It was never actually
15 used at the end of the day, but it was brought up to
16 pass. The judge didn't end up ruling relevance to
17 Heitmanis at all.

18 Q This is a document that has been prepared by MIGOP I
19 believe. It's --

20 A What date?

21 Q -- I don't know specifically the date. I can tell you
22 it's within the last two weeks probably. It's titled
23 at the top, "Statement and Policy on Conflict
24 Resolution Matters."

25 Have you seen this?

1 A No.

2 Q So at the top it says -- and this is prepared I believe
3 by Dan Hartman. It says --

4 A Do you know it's prepared by him or you just believe it
5 is?

6 Q I believe it is. It's my understanding.

7 A How do you understand that?

8 Q That's what I've been told by -- I don't know --

9 A By who?

10 Q -- well, it was conveyed by Dan Hartman.

11 A Who told you that Dan Hartman wrote this?

12 Q Well, that's not the point. The point is that --

13 A I don't believe you that he wrote it.

14 Q Okay. He may have wrote it. He may not have wrote it.

15 A I'm going to go with he didn't, but go ahead.

16 Q Okay. But it talks about at the top that he wants
17 MIGOP to now be Heitmanis compliant. Does that
18 surprise you?

19 A Where does it say that? I'd have to read through this.
20 I don't know. I don't know what -- I don't know what
21 this -- I've never seen this.

22 Q Okay.

23 MR. THOMAS: You know what's sad is that I've
24 asked for production on this stuff, and you've given me
25 none of these papers you're presenting. Is there a

1 reason for that, Matt?

2 BY MR. DEPERNO:

3 Q So just to be clear, would it surprise you if Dan
4 Hartman's view has changed, and he now wants MIGOP to
5 be Heitmanis compliant?

6 A I would have to have a full conversation with him on
7 that with context. I can't answer that question right
8 now.

9 Q Further on down in these -- in this stack of
10 documents --

11 A Which one? This one?

12 Q -- yeah. Four pages from the back.

13 In your second paragraph you cite in Kzoo they
14 placed three delegates into nominee positions creating
15 an EC with 21 delegates and 15 nominees.

16 A Uh-huh.

17 Q So is it --

18 A Was that not true?

19 Q -- well, no, I don't think it's true. I think it's
20 completely not true.

21 A Then what's the truth? Because that's what I've been
22 told.

23 Q So --

24 A Because you're one of the three.

25 Q -- so in Kalamazoo there's 18 statutory -- 18 nominees,

1 statutory.

2 A So 599 calls them nominee just so we're clear.

3 Q So there'd be 18 elected, correct?

4 A 18 delegates elected, yep.

5 Q Three of the nominees resigned or refused to take
6 office?

7 A Or moved or something, yep.

8 Q So there'd be 15 of those nominees --

9 A Right.

10 Q -- and 18 elected?

11 A Uh-huh.

12 Q Make sense?

13 A Yep, absolutely.

14 Q So how do you get to the math of 21 delegates and 15
15 nominees?

16 A Because my understanding is the executive committee
17 voted to elect you and two others to fill those three
18 roles and you're a delegate. 18 plus 3 is 21.

19 Q Is an executive committee able to select alternate
20 nominees?

21 A How would you select an alternate nominee? Nominees
22 are created by a selection by citizens. Unless there's
23 some statute that allows for a different process to
24 create a nominee, I would think that the answer to that
25 would be no.

1 Q Okay.

2 A And I've never seen one.

3 Q Let's go to the second from the back page.

4 A Oh, J.D. shared his personal message in this email.
5 Boy, was that interesting.

6 MR. THOMAS: Let me take a picture because I
7 don't have any --

8 THE WITNESS: It's a private message between
9 J.D. and I.

10 MR. THOMAS: Yeah.

11 THE WITNESS: So I would have -- I don't know
12 the law, but I have a question on how this is even -- I
13 don't know -- public.

14 MR. THOMAS: Don't have to give us any
15 discovery so this will be for show cause.

16 BY MR. DEPERNO:

17 Q You say I --

18 A How did you get this?

19 Q -- well, you say at the --

20 A How did you get this?

21 Q -- I think it's --

22 A It's a private message between J.D. and I so he gave it
23 to you?

24 Q Well --

25 A Right? Did you -- did you file something to get it for

1 this case?

2 Q We're not talking about -- I'm not answering --
3 answering questions. I'm asking questions.

4 A Do I have to answer your questions on something that
5 you shouldn't have?

6 Q You have to answer your questions.

7 A Do I have to answer questions on something you
8 shouldn't have?

9 Q I'm not here to debate with you. I'm here to ask
10 you --

11 A Did you file a subpoena for him to give you this? Did
12 you?

13 Q I don't have to do that, but I'm not here to debate
14 you.

15 A Anybody can give you anything for this case, and you
16 can set up a format and I have to answer questions for
17 it? Is that how this works? I don't know. I'm asking
18 the question.

19 Q That is how it works, but I'm not here to debate you.
20 I'm just here to answer questions -- or ask questions
21 and get answers from you.

22 You say at the top I truly pray for you that you
23 find humility, repentance, and redemption.

24 What do you mean by humility, repentance, and
25 redemption?

1 A I think those are self-exemplatory [sic]. I don't know
2 why I have to answer that. Those were basic common
3 English words. I mean what they mean. Whatever the
4 dictionary says, that's what I mean.

5 Q Why do you pray for that I guess?

6 A I would pray that for everybody. Humility, repentance,
7 and redemption are wonderful things. I pray that for
8 myself. I think everybody should lead with that. I
9 think that should be -- those are fine -- three fine
10 things in which to strive for in life.

11 Q I'm not questioning whether they are or not. I'm
12 trying to get an understanding of your -- your --

13 A Because I'm a Christian. Because the Bible calls me to
14 care about those things, and so I lead with those.

15 Q So what does repentance mean to you?

16 A It means --

17 MR. THOMAS: I'm objecting, Matt. What does
18 this have to do with our case? What does repentance
19 have to do with this case?

20 MR. DEPERNO: It has to do with your slander
21 claim.

22 MR. THOMAS: Yeah, what? Tell me what it has
23 to do with it.

24 MR. DEPERNO: You're the one that brought
25 slander, James, and I'm only --

1 MR. THOMAS: Mainly because of the things you
2 wrote.

3 MR. DEPERNO: I'm able --

4 MR. THOMAS: Okay.

5 MR. DEPERNO: -- to ask questions about the
6 truth of the matter --

7 MR. THOMAS: You have a matter for repentance
8 and something he said --

9 MR. DEPERNO: That you allege --

10 MR. THOMAS: -- he's not a party to this
11 case.

12 MR. DEPERNO: You allege slander in your
13 case. I can ask questions about the witness on his
14 view.

15 MR. THOMAS: Not him. He's not part of
16 the -- he's not part of that.

17 MR. DEPERNO: He is part of the MIGOP --

18 MR. THOMAS: It's outside the parameters of
19 what you're supposed to be doing here.

20 MR. DEPERNO: He's part of --

21 MR. THOMAS: It's got nothing to do with
22 this.

23 MR. DEPERNO: -- he's chief of staff of the
24 MIGOP --

25 MR. THOMAS: So what.

1 MR. DEPERNO: -- and I'm able to ask him, as
2 chief of staff of the MIGOP, what his view of these
3 words mean.

4 THE WITNESS: This case isn't about MIGOP,
5 and I'm -- and that's -- and MIGOP is autonomous from
6 the parties of this case. So how's that -- so how's me
7 being on the MIGOP relevant --

8 MR. THOMAS: He talks out of both sides of
9 his mouth.

10 THE WITNESS: I know.

11 MR. THOMAS: It's got nothing to do with it.
12 I'm objecting. You're outside. You're on a fishing
13 expedition.

14 MR. DEPERNO: Well, then do you -- would you
15 agree to dismiss voluntarily your slander claim?

16 MR. THOMAS: No.

17 MR. DEPERNO: If not, then I can ask the
18 witness about the truth of the allegations --

19 MR. THOMAS: The truth of what allegations?
20 What repentance means?

21 MR. DEPERNO: -- that you allege that the
22 allegation -- that you allege that there were certain
23 statements made that are slander. You say that in your
24 complaint.

25 MR. THOMAS: Yeah.

1 MR. DEPERNO: I can ask him -- I can get to
2 the truth of the --

3 MR. THOMAS: What does J.D. Glaser or him
4 have to do with any defamation claim in this case?

5 MR. DEPERNO: Well, he's the chief of staff
6 for the party --

7 MR. THOMAS: So what. What does that have to
8 do with the slander in this case?

9 MR. DEPERNO: I want to get an understanding
10 of his idea of what repentance and --

11 MR. THOMAS: What does it have to do with our
12 case?

13 MR. DEPERNO: Again, I'm not going to argue
14 with you. You lay your objection out, fine. Your
15 objection's on the record. Now I'd like the witness to
16 answer the question about what he means by repentance.

17 THE WITNESS: I mean the dictionary
18 definition of the word.

19 BY MR. DEPERNO:

20 Q What do you mean in the context of Christianity?

21 A The dictionary definition of the word.

22 Q And how do you define repentance then?

23 A However the dictionary defines it.

24 Q Well, if you're the one talking about it and praying
25 about it, I assume you have an understanding -- your

1 own understanding of what repentance means.

2 MR. THOMAS: Objection. Asked and answered.
3 He said it's from the dictionary. So if you want to
4 know, look it up in the dictionary and read it on the
5 record.

6 THE COURT REPORTER: Can we take a break
7 whenever you're able to?

8 MR. DEPERNO: Sure, if you would like.
9 That's fine.

10 THE COURT REPORTER: Is it okay right now?

11 MR. DEPERNO: Yeah, go ahead. We can take a
12 break.

13 THE COURT REPORTER: Thank you.

14 (Break in proceeding taken from
15 12:59 p.m. to 1:12 p.m.)

16 BY MR. DEPERNO:

17 Q Now you're aware that Ken Beyers and the District 4
18 chairs called a meeting for Thursday evening, correct?

19 A Uh-huh.

20 Q Do you think he has the authority to call that meeting?

21 MR. THOMAS: Objection. Again, outside the
22 parameters of our lawsuit. What does it have to do
23 with it? It's got nothing to do with it so you can
24 move to the next question.

25 BY MR. DEPERNO:

1 Q Do you believe he has authority to call that meeting?

2 A It's been objected.

3 Q Well, you can --

4 A He can call a district meeting for anything he wants.

5 Q Can he call a district meeting to hold a -- well, as he
6 put it, a meeting regarding whether the county chair
7 can stay in power? Can a district chair do that?

8 MR. THOMAS: Objection. What does this have
9 to do with our case? You're talking about a fourth
10 district issue. It's got nothing to do with our case.

11 BY MR. DEPERNO:

12 Q Can a 4th --

13 MR. THOMAS: Do you see what I'm saying to
14 you or are you just ignoring me, Matt?

15 MR. DEPERNO: I'm -- your -- your objection
16 is on the record. I don't have to look at you. Your
17 objection is on the record. Now the witness can
18 answer.

19 MR. THOMAS: He doesn't have to answer the
20 question. It's not relevant. You're outside the
21 parameters of what the judge ordered. Why don't you
22 obey what the judge --

23 MR. DEPERNO: Relevance --

24 MR. THOMAS: -- in this case?

25 MR. DEPERNO: -- relevance is not a proper

1 objection.

2 MR. THOMAS: You're on a fishing expedition.
3 He said we're not having a fishing expedition. You are
4 fishing for answers.

5 MR. DEPERNO: I'm trying to get an
6 understanding --

7 MR. THOMAS: It's got nothing to do with our
8 case.

9 MR. DEPERNO: I'm trying to get an
10 understanding of his --

11 MR. THOMAS: I don't care if you're trying to
12 get -- it's not -- it has nothing to do with this case.

13 BY MR. DEPERNO:

14 Q Can the 4th district chair hold a meeting to determine
15 whether the county chair remains in place?

16 A Next question.

17 Q Well, I want the answer to that question.

18 A I don't have an answer to that question.

19 Q You don't know or you don't -- you don't have an
20 opinion? You've not formulated an opinion? You just
21 don't know --

22 A The district chair can hold a meeting for whatever he
23 wants. His district committee of 25 individuals can
24 vote on whatever they want, and then you can make a
25 determination once they do so whether it's legal or

1 not. I don't -- I'm not going to answer anything
2 beyond that. I'm not on District 4.

3 Q When did you first meet Sabrina Pritchett-Evans?

4 A Sometime in the last year. I don't remember.

5 Q Do you remember when you first started to communicate
6 with Sabrina Pritchett-Evans?

7 A No.

8 Q Did you discuss her position with the Kalamazoo County
9 Republican Party?

10 A What does that mean? What position?

11 Q Any position she has within the party.

12 A No.

13 Q Did you discuss with her -- for her -- regarding her
14 ambition for running for chair of the KGOP?

15 A No.

16 Q Did you encourage her to run for the executive
17 committee for the KGOP?

18 A No.

19 Q When did you first meet Kim Harris?

20 A Sometime in the last year.

21 Q When did you start communicating with Kim Harris?

22 A Sometime after I met her in the last year. I don't
23 remember. I don't have all these dates in my head.

24 Q Did you discuss her position within the KGOP?

25 A Nope.

1 Q You just --

2 A I mean, when? Any time in the last year?

3 Q -- yeah.

4 A We all talk about our roles as delegates and other
5 things. What does that mean?

6 Q Have you discussed with her running for state
7 committee?

8 A State committee? The state committee?

9 Q Yeah.

10 A On -- explain that again.

11 Q Do you know what the state committee is?

12 A Yeah. I'm well aware of what that is. Of the
13 Republican Party?

14 Q Yes. Have you discussed with Kim Harris her running
15 for state committee?

16 A If I have, I don't remember it.

17 Q Would you want Kim Harris to be elected as the state
18 committee person from Kalamazoo County?

19 A What does that have to do with the case with three
20 people getting improperly put on the executive
21 committee in Kalamazoo?

22 Q Did you have discussions with Kim Harris --

23 A I love Kim. I think she's great.

24 Q -- did you want Kim --

25 A I like lots of people.

1 Q -- did you want Kim Harris to be the state committee
2 nominee from Kalamazoo County?

3 (Indiscernible crosstalk.)

4 MR. THOMAS: How is that even part of this?

5 THE WITNESS: There's more than one nominee.
6 What do you mean?

7 BY MR. DEPERNO:

8 Q Did you want her to be one of the nominees?

9 A I wanted lots of people to be nominees. I think she
10 would have been great.

11 Q When did you first meet Anna Kamp?

12 A Irrelevant. This Anna Kamp -- we're not doing it.

13 MR. THOMAS: You know what, that's -- it's
14 outside the boundaries. The judge already said --

15 THE WITNESS: Now you're on a fishing
16 expedition that I will not participate in.

17 MR. DEPERNO: The judge says -- the judge
18 said we're entitled to all communications with Anna
19 Kamp.

20 MR. THOMAS: It was quashed.

21 MR. DEPERNO: That's not what the order says.

22 MR. THOMAS: It was quashed.

23 MR. DEPERNO: No. The judge still said in
24 his order that we're entitled to communications which
25 had to be produced by Friday. All communications with

1 the witness Joe Studebaker and Anna Kamp and Mike
2 Labadie. We're entitled to those communications so we
3 didn't --

4 MR. THOMAS: We were entitled to stuff too
5 and you never produced any of it. How about that?

6 BY MR. DEPERNO:

7 Q So when did you first meet Anna Kamp?

8 A Move on. Irrelevant to the case.

9 Q It's not irrelevant.

10 A It is irrelevant.

11 Q Are you refusing to answer?

12 A It's irrelevant to the case. You can put down whatever
13 you want.

14 Q When did you first meet Mike Labadie?

15 A Same answer. Move on.

16 Q Do you think Mike Labadie's name should not be
17 mentioned?

18 A I don't know what that means --

19 MR. THOMAS: What kind of question is that?
20 Objection. What does that mean?

21 THE WITNESS: What does that mean?

22 MR. THOMAS: That his name should not be
23 mentioned in what? What context?

24 MR. DEPERNO: I'm just asking the question.

25 MR. THOMAS: It's not a question.

1 MR. DEPERNO: You can object to the form of
2 the question. You could say objection to the form, can
3 you rephrase that, but you can't object to the
4 relevance. So --

5 MR. THOMAS: I didn't say relevance.

6 THE WITNESS: Well, I can. I'm not -- I'm
7 not going to answer questions on that. Go ahead and do
8 your legal crap. It ain't happening.

9 BY MR. DEPERNO:

10 Q Why isn't it happening?

11 A I'm not talking to you about people that are totally
12 irrelevant to the case that have nothing to do with
13 Kalamazoo. You're not building it -- you're on --
14 you've been on a fishing expedition the whole day, we
15 all know it, and we know what you're going after. So
16 I'll say it now. I don't know what your deal is.
17 You're posting on telegram. You think that we cheated
18 to have Kristina win -- I saw you post that -- and yet
19 you concede the election to Nessel the day after the
20 election.

21 So you were supposed to be Mr. Election Integrity,
22 and you're completely backwards on that. So I have
23 no --

24 Q Do you support --

25 A -- answers or respect for you in that regard in any

1 way, shape, or form.

2 Q Do you support election integrity issues?

3 A What does that mean?

4 Q Do you support efforts to ensure that our elections are
5 free and fair and --

6 A Absolutely. I love election integrity. I wish we had
7 it. And you and I had a two-hour conversation on the
8 phone about that so you darn well know where I sit on
9 that.

10 Q Have you ever talked to Tony Lorenz?

11 A I don't even know who that is.

12 Q The prior chair of the KGOP.

13 A Okay.

14 Q Have you ever had a conversation --

15 MR. THOMAS: Objection. Asked and answered.
16 He said no.

17 MR. DEPERNO: Well, he didn't say that. He
18 said who is it. So I explained who he is and now maybe
19 he has better -- maybe that helps him in his memory to
20 recall who he is.

21 THE WITNESS: If I don't know who they are,
22 that means I've never talked to them.

23 BY MR. DEPERNO:

24 Q So your testimony under oath today is you never talked
25 to Tony Lorenz?

1 A Not only have I not talked to that person, I don't know
2 who they are.

3 Q When did you first meet Dan Hartman?

4 A December.

5 Q Are you part of Michigan Precinct First?

6 A It doesn't -- that doesn't exist so I'm not part of it.

7 Q Isn't that the group that Anna Kamp runs?

8 A It doesn't exist anymore.

9 Q Anymore, but it did at one point?

10 A I think you know the answer to that.

11 Q I believe she still has a website up, doesn't she?

12 A She might have a website. I haven't been to it in
13 quite a while.

14 Q Was it dissolved, Michigan Precinct First?

15 A In terms of what?

16 Q Just not operating anymore.

17 A You could argue that.

18 Q Why? Do you know why?

19 A I'm not -- that's not relevant to this. Nor is it in
20 any way, shape, or form touch this case. So if you're
21 going to go on a fishing expedition on MI Precinct
22 First, you can move on.

23 Q Do you condone individuals who are no longer precinct
24 delegates voting at state committee?

25 A What?

1 A Do you condone individuals who are no longer precinct
2 delegates voting at state committee?

3 A Is that just some kind of hypothetical bullcrap? What
4 is that?

5 Q It's not a hypothetical. Do you condone --

6 MR. THOMAS: I'm objecting to the form. I
7 don't even understand it.

8 MR. DEPERNO: There you go, objection to
9 form.

10 MR. THOMAS: Yeah, well, I don't understand
11 the question so --

12 MR. DEPERNO: Okay. So now I can try to
13 rephrase the que.

14 MR. THOMAS: Go ahead and rephrase it. I
15 don't know -- I don't think you're --

16 BY MR. DEPERNO:

17 Q If a person is no longer a delegate, are they allowed
18 to vote on state committee?

19 A The only people that can vote on state committee are
20 state committee members. I -- what is your question?
21 What are you getting at? Just get to the point.

22 Q Are you -- do you have to be a delegate -- precinct
23 delegate to be on state committee?

24 A You're elected to state committee at a district
25 convention, right? Right?

1 Q You're answering the question.

2 A The answer is yes. You're elected to state committee
3 at a district convention. The members at that state
4 committee are elected to go to that convention, and run
5 for that by their counties in a convention of
6 delegates. So by a logical connection of the steps to
7 get there, then, yeah, you've got to be a delegate to
8 be on state committee. I'm guessing you have some
9 example of someone that you think is not a delegate
10 that's on state committee, or otherwise I don't know
11 where you're going with this.

12 Q Well, Kim Harris is no longer a delegate, and she's
13 been voting on state committee.

14 A She's not on state committee.

15 Q She is on state committee.

16 A Really? She's on D-4 state committee?

17 Q Isn't Kim Harris a state committee member?

18 A Okay. I'll stand corrected on that. Yes. You also
19 don't have proof that she's not a delegate.

20 Q So if she was not a delegate you would agree that she
21 couldn't vote --

22 A I don't agree that she's not a delegate.

23 Q -- if she wasn't a delegate, you'd agree that she
24 couldn't vote on state committee?

25 A I'd have to go back and look at the bylaws on that.

1 The process would indicate that delegates are the only
2 ones funneled to that position. I don't know if the
3 rules -- if they're -- and I don't know that the rules
4 even say that. Either way, she is a delegate, yeah,
5 state committee.

6 Sorry, my brain is dying here. I need lunch. You
7 were supposed to feed me lunch at noon.

8 Q Who is?

9 A You. You make me come here. Where's my lunch? That's
10 a joke. Laugh. But I am hungry.

11 MR. DEPERNO: Would you like to take a break
12 for lunch?

13 THE WITNESS: No, keep going. How much
14 longer you got?

15 MR. DEPERNO: Not much longer.

16 THE WITNESS: Okay.

17 BY MR. DEPERNO:

18 Q Do you -- at this time is there anything that you've
19 said today that you'd like to change your answer to?

20 A No.

21 Q Are you going to be present in court tomorrow morning?

22 A I believe so.

23 Q Is that a yes or no?

24 A I'm understanding that I have to be there so I'm
25 planning on being here.

1 Q Are you surprised that you were selected by Jimmy
2 Thomas as a, quote, expert, end quote --

3 MR. THOMAS: Objection to form. I never said
4 he was an expert. You're now getting into work
5 product.

6 BY MR. DEPERNO:

7 Q Are you surprised that you were called as a witness to
8 testify tomorrow?

9 A No.

10 Q Why were you not surprised?

11 A Because I'm not surprised. There's no, like, genius
12 answer to that.

13 Q Okay.

14 A I'm just not surprised.

15 MR. DEPERNO: I don't have any other
16 questions for the witness.

17 MR. THOMAS: We're done.

18 (Deposition concluded at 1:30 p.m.)

19 Transcript of JOEL STUDEBAKER

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2)ss.

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9

10 I also certify that prior to taking this
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13

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zero 9:17 24:17 28:15 67:23

Zinner 42:1