

# MEMORANDUM

**To:** Michael Whatley, RNC chief counsel  
Ronna McDaniel, RNC Chairwoman

**From:** Matthew S. DePerno, Esq.

**Dated:** January 9, 2024

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## 1. INTRODUCTION

On January 6, 2024, a valid meeting of the Michigan Republican Party ("MRP") state committee ("Committee") was held. During that meeting (among other action as detailed herein), Kristina Karamo was removed as chairwoman and Daniel Hartman was removed as general counsel.

I was present at the special meeting as one of the acting volunteer attorneys aiding the temporary chair with procedural or legal issues. Other volunteer attorneys present were Margaret Kurtzwell, Matt Wilk, and John Dunlap. Video and audio of the special meeting are available on request.

This memorandum does the following:

- details some of the reasons cited by Committee members why they voted to remove Karamo, Hartman, and others from MRP;
- details the processes utilized to remove Karamo, Hartman, and others from MRP;
- includes documents cited by Committee members;
- includes documents relevant to the removal of Karamo, Hartman, and others from MRP;
- concludes that all rules were properly and timely followed;
- requests the RNC use it's inherent powers to declare all rules were properly followed in the removal of Karamo, Hartman, and others from MRP and declare Karamo and Hartman are no longer chair and general counsel, respectively.

Nevertheless, Karamo has vowed that she will not leave. Instead, she has organized a meeting for Saturday, January 13, 2024, at which time she has vowed that "[t]he rogue faction of anti-grassroots operatives who conducted this unlawful process will be dealt with swiftly and accordingly based on the rules of the MI GOP bylaws."



**Michigan GOP** @MIGOP · Jan 6

The allegations that Chairwoman Kristina Karamo has been removed are categorically FALSE. The rogue faction of anti-grassroots operatives who conducted this unlawful process will be dealt with swiftly and accordingly based on the rules of the MI GOP bylaws.



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The bylaws have been followed. Removal was proper. We now request RNC exercise its power to officially declare that the meeting and the removal process was valid and that Karamo, Hartman, and others are no longer officers and/or employees of MRP and that they must cease and desist all activity related to MRP and turn over all documents, passwords, and other materials to acting chair Malinda Pego.

## 2. MEMBERSHIP

The bylaws of MRP, as amended December 3, 2022 are attached as [Exhibit 1, App'x 1, pp 1-26].

ARTICLE III(A) establishes the regular membership as the following:

- 7 persons from each of the 13 congressional districts
- the Chairman
- the Co-Chairman
- Coalitions Vice Chairman
- Outreach Vice Chairman
- Grassroots Vice Chairman
- Ethnic Vice Chairman
- Administrative Vice Chairman
- Youth Vice Chairman
- Secretary
- Treasurer
- General Counsel
- Finance Chairman
- National Committeeman
- National Committeewoman
- President of the Republican Women's Federation of Michigan

- Chair of county chairs

These positions total 107 spots. However, the "chair of county chairs" position was never appointed and remains vacant. Therefore, there are 106 Committee members spots.

As of December 2, 2023, there were 104 Committee members.

As of January 6, 2023, there were 106 Committee members.

### 3. **RULES FOR SPECIAL MEETING**

ARTICLE VI(B) establishes the process for a special meeting.

- B. Special Meetings. Special meetings of the Committee may be called by the Chairman when the business of the Committee requires the same, and the Chairman shall call a special meeting of the Committee on written request of one-third of the members of the Committee, jointly or severally, within 15 days after such written request has been filed with the Chairman. Upon failure to do so, any such member can give notice five (5) days before such meeting. Notices of special meetings shall state the purpose of such meetings.

[Exhibit 2, App'x 1, pp 27-32] is the demand for special meeting ("Demand") signed and submitted on December 2, 2023. It was signed by 39 members. On December 2, 2023 there were 104 Committee members.<sup>1</sup> This is 37.5% of the Committee and satisfies the one-third membership requirement.

Additionally, the Demand stated "the business" (i.e. purpose) of the special meeting:

**Agenda to Include: Transparency, Accountability, Unity, Proposed Bylaw Amendment, review and possible removal of Kristina Karamo, Dan Hartman, Robert Owens and Jim Copas.**

Karamo had 15 days to call a special meeting (January 17, 2023).

Karamo admitted receipt of the notice of the Demand in an email dated December 5, 2023 when she objected to the Demand [Exhibit 3, App'x 1, pp 33-37]. Her objections are the following:

- 1) "The members have no authority to dictate the time and place of the meeting UNLESS the Chairman fails to call the meeting within 15 days."
  - This objection is without merit. In anticipation of Karamo failing or refusing to call a special meeting pursuant to the stated "business" or purpose, a date and time was added. This does not render the Demand invalid. The bylaws do not preclude a member from adding the date and time to the Demand.

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<sup>1</sup> There were 104 Committee members on December 2, 2023. Two of the empty spots were filled after Dec 2, 2023, meaning there were 106 Committee members on January 6, 2023.

- 2) "Individuals can not declare the that admin vice-chair or anyone else chair the meeting, nor can they declare the 8th district chair<sup>2</sup> or anyone else will be the secretary."
- This objection is without merit. In anticipation of Karamo failing or refusing to call a special meeting pursuant to the stated "business" or purpose, the Demand included the members who would act as temporary chair and secretary for the special meeting. This does not render the Demand invalid. The bylaws do not preclude a member from including this information in the Demand.
- 3) "These individuals cannot put a bylaw change on the agenda, as MIGOP bylaws state the process of amending the bylaws. These individuals must first submit their requested change to the policy committee. If it passes the policy committee, it will be sent to members 30 days before voting on the proposed bylaw amendment."
- This objection is without merit. The proposed bylaw amendment was properly submitted and seeded, as explained below. Karamo misstates the bylaw amendment procedure.
- 4) "Additionally, they have the authority to call a meeting to remove any member if the requirement to remove the member has been satisfied, which they have yet to do."
- This objection is without merit. The signature requirement for removal was satisfied, as explained below. According to the bylaws, the petition for removal with signatures is presented at the time the motion is brought to the floor, not at the time the special meeting is requested. Karamo misstates the bylaws removal procedure
- 5) "These individuals are functionally attempting to use the bylaw provision for a special meeting and turn it into a trial by asserting claims of authority that the bylaws do not afford them."
- This objection is without merit and makes little sense. A special meeting to remove members will afford those members the opportunity to make the necessary points of order and relevant discussion to the floor. It is not a trial.

#### **4. KARAMO FAILED TO PROPERLY CALL THE SPECIAL MEETING**

On December 16, 2023, Karamo issued a call for a special meeting [Exhibit 4, App'x 1, pp 38-40] for January 13, 2024. However, this call did not address or include the purposes raised in the Demand. To the contrary, Karamo's agenda stated only the following:

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<sup>2</sup> Anne DeLisle is the 8th District Chair. Subsequent to the special meeting and in retaliation of Anne DeLisle acting as temporary secretary, Karamo has removed all reference to Anne DeLisle from the MIGOP website. *Supra*

1. Prayer
2. Pledge of Allegiance
3. Call to Order
4. Roll Call
5. August Convention Rules
6. Kalamazoo County Party Leadership
7. Better Political Representation
8. Financial Report.
9. Adjournment

Karamo failed to call a special meeting to address the "business" raised in the Demand by the deadline of December 17, 2023. Upon the failure to timely call a special meeting, the right to call a special meeting to address the Demand defaulted to "any such member." Pursuant to Article VI(B), any Committee member could then issue a call to address the "business" or purposes stated in the Demand, upon five days' notice.

Very clearly, Karamo was intentionally circumventing both the plain language of the bylaws and the spirit of the bylaws. By making frivolous objections to the Demand, Karamo was attempting to effectively prevent a vote on her removal from taking place. Her plan was clear: raised frivolous objections to postpone a vote, force members to issue a new demand for special meeting, make further frivolous objections, and delay the vote on her removal in perpetuity. That strategy is not permitted.

## **5. CALL FOR JANUARY 6 SPECIAL MEETING**

On December 31, 2023, Committee member Bree Moeggenberg sent an email to the appropriate parties containing the call for special meeting [Exhibit 5, App'x 2, pp 41-43] for the "business" or purposes as detailed in the original Demand. The meeting was scheduled for January 6, 2023. The email contained the following:

- call for special meeting [Exhibit 6, App'x 1, pp 44-45]
- the agenda [Exhibit 7, App'x 1, pp 46-47]
- bylaw amendment #1 previously submitted by Ian Shetron (change for percentage to remove offices) [Exhibit 8, App'x 1, pp 48-50]
- bylaw amendment #2 previously submitted by Bree Moeggenberg (change for conflict resolution) [Exhibit 9, App'x 1, pp 51-53]
- proxy form [Exhibit 10, App'x 1, pp 54-55].

This call for special meeting satisfied the requirements of ARTICLE VI(B). It was issued at least 6 days before the scheduled meeting.

It is noted, however, that one of the attachments (the bylaw changes for conflict resolution) was an early version of the bylaw amendment. Bree Moeggenberg corrected this error on January 1, 2024 when she sent another email with the correct attachment [Exhibit 11, App'x 1, pp 56-62]. This

is immaterial for two reasons: (1) the January 1 email was timely within 5 days of the meeting and (2) the bylaw change for conflict resolution was tabled at the January 6 meeting and never brought to the floor.

## **6. THE PROCEDURE FOR BYLAW AMENDMENTS WAS FOLLOWED**

ARTICLE XV establishes the process for bylaw amendments.

- A. Submission in Writing. All proposed amendments to these Bylaws shall be first submitted in writing to the Policy Committee.
- B. Notification Of Committee Members. Each member of the Committee shall be notified in writing of the context of any proposed amendment at least thirty (30) days before the date on which such proposed amendment is to be voted on.
- C. Vote Required To Amend Bylaws. No amendment shall pass until it has received a sixty-six and two-thirds percent (66.67%) favorable vote of the Committee present and voting, provided there is a quorum present, and such favorable sixty-six and two-thirds percent (66.67%) vote must be made in person by such members and not by proxy.

Two bylaw amendments were properly submitted and seeded. Both amendments propose a change in the voting percentage needed to remove a member.

### **AMENDMENT #1: IAN SHETRON AMENDMENT**

The first amendment on the agenda [Ex 8] was proposed by Committee member Ian Shetron on November 4, 2023. The email with the attached amendment was sent to the Policy Committee and each member of the Committee [Exhibit 12, App'x 1, pp 63-68]. As of that date, Andy Sebolt was the policy chair. This amendment focused on lowering the percentage needed to remove an officer from 75% to 60%.

### **AMENDMENT #2: BREE MOEGGENBERG AMENDMENT**

The second amendment on the agenda [Ex 9] was proposed by committee member Bree Moeggenberg on November 4, 2023. The email with the attached amendment was sent to the Policy Committee and each member of the Committee [Exhibit 13, App'x 1, pp 69-77]. As of that date, Andy Sebolt was the policy chair. This amendment focused on changes to the conflict resolution committee and on lowering the percentage needed to remove an officer from 75% to 66.67%.

### **AMENDMENTS WERE PROPERLY SUBMITTED AND SEEDED**

The emails reveal that both proposed amendments were submitted on November 4, 2023 by written document to both the Policy Committee and the Committee members.

Karamo initially objected to the Demand, in part, because she did not think the process to amend the bylaws was followed. See [Ex 3]. She stated "[t]hese individuals must first submit their requested

change to the policy committee. If it passes the policy committee, it will be sent to members 30 days before voting on the proposed bylaw amendment."

Karamo read the bylaws incorrectly. To the contrary, In her objection, Karamo argued that the Policy Committee must pass the bylaw amendment before it can be sent to the entire body. That is false. To the contrary, the proposed amendment must be seeded for 30 days in the policy committee. If the policy committee takes no action, then another member of the entire Committee may bring the amendment to the floor. According to the bylaws, the following steps must (and did) occur:

- The proposed amendment must first be submitted to the policy committee- this was satisfied
- Each member must also be notified in writing of the proposed amendment at least 30 days before it is voted on – this was satisfied
- Then the proposed amendment requires two-thirds percent (66.67%) favorable vote of the Committee "present and voting" to pass, in person with no proxies voting – this was satisfied.<sup>3</sup>

This process prevents the policy committee from stalling or killing proposed amendments without action.

## **7. PROCEDURE FOR REMOVAL OF OFFICERS**

ARTICLE III(G) establishes the process for removal of officers. Karamo and Dan Hartman (general counsel) are defined as "officers" pursuant to ARTICLE IV(A).

### **K. Removal Of Officers.**

1. Removal By The Chairman. The Chairman shall have the power to declare vacant the seat of any officer who refuses to support the Republican nominee for any office within the State of Michigan.
2. Removal By The Committee. Any officer may be removed as an officer and member of this Committee by the Committee upon a seventy-five percent (75%) vote of the Committee present and voting at any meeting of the Committee, provided there is a quorum present, and such seventy-five percent (75%) vote must be made in person by such members and not by proxy; provided, further, that in order to bring the question before the Committee as to the removal of an officer, a petition requesting that such a vote be taken, bearing the signatures of at least fifty percent (50%) of the entire Committee (no proxies allowed), shall be filed with the Chairman (or, if the Chairman is the officer in question, then such petition shall be filed with the Secretary).

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<sup>3</sup> The "Committee" referenced in ARTICLE XV(C) is the MRP state Committee, not the Policy Committee. All steps were satisfied, meaning the amendments were properly "seeded" for a vote of the whole Committee.



3. Procedures For Removal. Since removal by the Chairman or by the Committee is discretionary, there shall be no formal procedures required to remove an officer as an officer and member of this Committee.
4. Selection Of Successor. In the event of the removal of an officer, a successor shall be selected at the next meeting of the Committee, which meeting shall be in part called for that purpose. Upon removal, an officer shall not be eligible to become a member of this Committee for the remainder of the term of office for which such officer was removed.

### 50% THRESHOLD

There are 106 Committee members. Therefore "in order to bring the question before the Committee as to the removal of an officer" signatures of at least 50% of the entire Committee (no proxies) shall be filed with the Chairman and/or Secretary.

Fifty-Four (54) signatures were presented to Karamo and the Secretary at 1:49 PM (by Matthew DePerno) [Exhibit 14, App'x 1, pp 78-79] and 2:05 PM (by Margaret Kurtzwell) [Exhibit 15, App'x 1, pp 80-81].

The signatures are attached as [Exhibits 16-18, App'x 1, pp 82-198]. The file labeled "Karamo +1" contains the 54th signature to remove Karamo [Ex 18].

NOTE: the special meeting was called to order at 1:59 PM. The motion on the removal of Karamo and the motion on the removal of Hartman were made well after the start of the meeting. These petitions and signatures were presented prior to the motions to remove Karamo and Hartman.

## **8. SPECIAL MEETING: QUORUM and CALL TO ORDER**

The meeting was called to order at 1:59 PM. A copy of the minutes is attached as [Exhibit 19, App'x 1, pp 199-226].

ARTICLE VI(C) establishes defines quorum.

Quorum. A majority of the total membership of the Committee present in person or by proxy shall constitute a quorum to transact business of the Committee except where the action of the Committee requires a larger number of members as specially set forth in these bylaws.

Quorum was established by 45 Committee members and 26 proxies, totaling 71 people for quorum. The quorum list is attached [Exhibit 20, App'x 1, pp 227-257].

Some people may incorrectly argue that this section requires a larger quorum number to take a vote for bylaw amendments or removal of an officer because the vote needed is 66.67% and 75%, respectively. That is not correct. A higher quorum is sometimes required for matters that require a

higher vote but only if "specially set forth in these bylaws." The bylaw provision for removal do not "specially set forth" a higher quorum for these matters.

To the contrary, other provisions in the bylaws do "specially set forth" higher quorum numbers. For example, ARTICLE VII(H) deals specially with quorum for standing committee meetings. That section clearly speaks to two different quorums depending on the standing committee that is meeting; and those quorum requirements are "specially set forth" in that provision. Most standing committees only require a simple majority of the membership present in person or by proxy to conduct business. That section specifically states that the vote required at a standing committee meeting shall be "not less than a majority of the membership of such committee present in person or by proxy." However, that section further states, in part, that quorum "present at a Budget Committee meeting shall consist of not less than two-fifths of the membership of such committee in person."

In other words, business at a regular standing committee can only be conducted with 50% of members present or by proxy. However, for the Budget Committee, business can be conducted with 40% of members present (excluding proxies). Budget Committee has 13 persons on its allocation. A 40% quorum requires only 5 members, but they must be present without proxy.

Thus, for the special meeting on January 6, 2024, a quorum is a simple majority of the total membership including proxies; or 53. There were 71 people present (members plus proxies). Once quorum was met, then the vote of 66.67% was required to amend the bylaws (present members only) and the vote of 60% was required to remove an officer (present members only).

Nevertheless, even if a different interpretation applies and a higher threshold was required for quorum, it was still achieved.

- The bylaws require 66.67% vote to amend the bylaws. The membership present with proxies was 71 out of 106, or 66.9%, which is greater than 66.67%.
- The bylaws require a 75% vote to remove an officer, which was amended to 60% before removal (see below). The membership present with proxies was 71 out of 106, or 66.9%, which is greater than 60%.

## **9. VOTE TO AMEND THE BYLAWS**

The first matter addressed was the bylaw amendment #1 proposed by Ian Shelton. This amendment passed with a vote of 39 to 5, or 88.6%.

The bylaw amendment #2 was tabled because it dealt with an amendment of the same provision.

## **10. VOTE TO REMOVE KRISTINA KARAMO**

Committee member Stephanie Rectenwal made the motion to remove Karamo. The motion was seconded by Jon Rocha. A secret ballot was conducted. The motion passed with a vote of 40 to 5, or 88.90%.

It should be noted that even though (former) general counsel Dan Hartman called this meeting illegitimate, he attended the meeting, he was credentialed, he made point of order objections, and he voted. The Karamo administration cannot seriously claim the meeting was illegitimate while its general counsel is present and participating in the meeting.



There were multiple reasons cited leading up to an at the meeting for the removal of Karamo and Hartman, including the financial improprieties that were revealed in the 140-page report titled *The Failed Leadership of the Karamo Administration* [Exhibit 21, App'x 2, pp 258-398]. These financial problems have brought national attention and embarrassment to MRP, Karamo, and Hartman.

- <https://www.detroitnews.com/story/news/politics/2023/09/29/michigan-republican-party-faces-financial-turmoil-bank-records-show/71003017007/>
- <https://www.cnn.com/2023/12/20/politics/michigan-gop-financial-turmoil-infighting-invs/index.html>
- <https://apnews.com/article/michigan-republican-karamo-bb7cc4b773d345c4a6a5363895b270bd>
- <https://www.craigslistdetroit.com/politics-policy/michigan-republican-party-turmoil-over-leadership-money>
- <https://www.mlive.com/politics/2023/12/michigan-gop-on-the-brink-of-bankruptcy-broke-campaign-finance-laws-report-alleges.html>
- <https://www.nytimes.com/2023/08/29/us/politics/trump-michigan-republican-party.html>

Another reason cited for the removal of Karamo was the frivolous lawsuit filed by Karamo and Hartman styled *Michigan Republican Party v Michigan Republican Party Trust and Comerica Bank*, File No. 23-0845-CZ, Ingham County Circuit Court [Exhibit 22, App'x 3, pp 399-495]. This lawsuit was filed without the authorization of Committee members. It was filed against the former MRP chairs who own the MRP headquarters in trust. The lawsuit alleges that MRP owns the building and can sell it, which is patently false (as described in the lawsuit and motion to dismiss). This lawsuit has brought national attention and embarrassment to MRP, Karamo, and Hartman.

- <https://www.craigslist.com/politics-policy/michigan-republican-party-targeted-sanctions-lawsuit>
- <https://www.detroitnews.com/story/news/politics/2023/12/08/michigan-republican-party-lawsuit-kristina-karamo-headquarters-building-comerica-bank-gop-trust/71857271007/>
- <https://wdet.org/2023/12/11/what-republicans-make-of-escalating-tensions-in-the-michigan-gop/>

On January 2, 2024, the defendant Trust filed a motion for summary disposition and for sanctions [Exhibit 23, App'x 4, pp 496-667]. The motion sets forth the reasons why the lawsuit is frivolous and should be dismissed. The motion specifically states in footnote 8, "Because Plaintiff is an unincorporated voluntary association, the sanctions may be awarded against each member of the Michigan Republican State Committee individually. MCL 600.2051(2)." This motion has brought national attention and embarrassment to MRP, Karamo, and Hartman.

- <https://www.law360.com/real-estate-authority/commercial/articles/1782732/trust-seeks-sanctions-against-mich-gop-in-hq-control-spat->
- <https://www.newsfromthestates.com/article/trust-owns-former-michigan-gop-headquarters-seeks-dismissal-lawsuit-and-sanctions>

The ramifications of this lawsuit are described in a comprehensive report prepared by attorney John Dunlap titled *An Analysis of the Michigan Republican Party v Michigan Republican Party Trust et al Lawsuit* [Exhibit 24, App'x 5, pp 668-699]. The Dunlap Report details how this lawsuit subjects all Committee members to personal liability. It was not authorized by the Committee members.

Another reason cited for the removal of Karamo was the *Order for Contempt of Court* recently issued on December 28, 2023 in the case of *Hillsdale County Republican Executive Committee v Daren Wiseley et al*, Case No. 22-688-CZ, Hillsdale County Circuit Court [Exhibit 25, App'x 5, pp 700-707]. The order sanctioned Karamo, Hartman, the Committee, and others a fine of \$500 plus attorney fees. It is expected the attorney fees will exceed \$50,000. This contempt order has brought national attention and embarrassment to MRP, Karamo, and Hartman.

- <https://www.mlive.com/politics/2024/01/michigan-gop-state-leaders-ordered-to-pay-thousands-in-hillsdale-dispute-judge-rules.html>
- <https://www.bridgemi.com/michigan-government/michigan-gop-chair-kristina-karamo-held-contempt-over-party-squabble>

Prior to calling the special meeting, 8 of the 13 district chairs authored a letter calling for the resignation of Karamo [Exhibit 26, App'x 26, pp 708-713]. The letter referenced the deep divides and fractures that have been created in the MRP by Karamo, the financial failures, the lack of honesty and transparency, and the legal problems. A letter of "no confidence" from 61.5% of the district chairs cannot be overlooked. These 8 district chairs are now under attack by Karamo. For example, Anne DeLisle was removed from the MRP website following the January 6 special meeting.

## **11. VOTE TO REMOVE DAN HARTMAN**

Committee member JD Glaser made the motion to remove Hartman. The motion was seconded by Dan Wholihan. A standing vote was conducted. The motion passed with a vote of 39 to 2, or 95%.

## **12. VOTE TO FIRE JIM COPAS**

Jim Copas is a staff employee and executive director for MRP. A court has determined that Mr. Copas previously committed 10 counts of wire and mail fraud. See *Flextronics International P.A., Inc. v Copas*, 327 F.Supp.2d 934 (N.D. Ill. 2004). Mr. Copas is also the person who arranged a \$100,000 payment to Jim Caveziel to speak at the Mackinac Republican Leadership Conference in September. Many Committee members dispute the rationale behind this transaction.

- <https://www.mlive.com/politics/2023/12/michigan-gop-on-the-brink-of-bankruptcy-broke-campaign-finance-laws-report-alleges.html>

Committee member Dan Wholihan made the motion to "remove Jim Copas from having any role with the Michigan Republican Party, paid or unpaid, hired or advisory, now and in the future." The motion was seconded by Hassan Nehme. The motion passed by a unanimous voice vote with one abstention.

## **13. VOTE TO FIRE ROBERT OWENS**

Robert Owens is a staff employee and director of communications for MRP. Committee member Lisa Mankiewicz made the motion to "remove Robert Owens from any position in any capacity with the Michigan Republican Party."

He is behind a series of vitriolic emails attacking Committee members. He has signed these emails as "R. Morris Owens, J.D., Director of Communications for Michigan Republican Party." The emails are available upon request.

Mr. Ownes was initially suspended from the practice of law on December 19, 2018 and again on July 19, 2022. These documents are available upon request.

The motion was seconded by multiple members. The motion passed by a voice vote with one "nay" and one abstention.

#### **14. MOTION TO STATE THE COMERICA LAWSUIT WAS NOT AUTHORIZED**

For the reasons stated above in the reports and items cited above [Ex 21-26] Committee member Norm Shinkle the following motion:

"I move that Michigan Republican State Committee goes on record stating the recent lawsuit filed by our General Counsel against the Michigan Republican Trust and Comerica Bank was done without the support or authorization of the Republican State Committee. Also, that the current leaders of the Hillsdale County Republican Party as ordered by a Hillsdale County Court was misidentified on the State Party website without the authorization of the Republican State Committee. I request a roll call vote."

The motion was seconded by Dab Wholihan. The motion passed with 63 "yays," 2 "nays," and 1 abstention.

#### **15. VOTE TO PRESERVE DOCUMENTS**

Committee member Margaret Kurtzwell made the motion to "instruct the acting chair to forward to the following persons a Notice to Preserve Documents:

Anna Kamp	John Deluca	Braden Giacobazzi
Joseph Moss	James Michael Copas	Phillip O'Halloran
Angela Gillissee	Joel Studebaker	Jenifer Standerfer
Timothy Vetter	Jason Rogers	Samantha Strayer
Lori Skibo	Ken Beyer	Ann Clark
Daniel J. Hartman	Robert Morris Owens	Michael Labadie
Kristina Karamo"		

The motion was seconded by Ali Hoissein. The motion passed by a unanimous voice vote with one abstention. The notices to preserve documents are attached as [Exhibit 27, App'x 5, pp 714-771].

#### **16. VOTE TO SEND NOTICE OF TERMINATION, CEASE AND DESIST, and RETURN OF PROPERTY**

Committee member Margaret Kurtzwell made the motion to "I move to instruct the acting chair to forward the following persons a notice of termination, cease and desist and return of property:

Robert Morris Owens	James Michael Copas
Joel Studebaker	Lori Skibo"

The motion was seconded by Dan Lawless. The motion passed by a unanimous voice vote with one abstention. The notices of termination, cease and desist, and return of property are attached as [Exhibit 28, App'x 5, pp 772-776].

**17. VOTE TO SEND NOTICE OF REMOVAL, CEASE AND DESIST, and RETURN OF PROPERTY**

Committee member Margaret Kurtzwell made the motion to "I move to instruct the acting chair to forward the following persons a notice of removal, cease and desist and return of property:

Daniel J. Hartman

Kristina Karamo"

The motion was seconded by Norm Shinkle. The motion passed by a unanimous voice vote with one abstention. The notices of removal, cease and desist, and return of property are attached as [\[Exhibit 29, App'x 5, pp 777-779\]](#).

**18. VOTE TO SEND NOTICE FOR ACCEPTANCE OF RESIGNATION and RETURN OF PROPERTY**

Committee member Margaret Kurtzwell made the motion to "I move to instruct the acting chair to forward to the following persons notice acceptance of resignation and return of property:

Angela Gillisse

Jennifer Standerfer"

The motion was seconded by Dawn Beattie. The motion passed by a unanimous voice vote with one abstention. The notices of for acceptance of resignation and return of property are attached as [\[Exhibit 30, App'x 5, pp 780-782\]](#).

**19. VOTE TO CANCEL MEETING SCHEDULE FOR JANUARY 13**

Committee member Ian Shelton made the motion to "cancel the meeting for January 13."

The motion was seconded by Ali Hossein. The motion was restated as "the motion that the acting chair rescind any calls for a meeting on January 13." A standing vote passed 48-3, or 94.1%. The notice to rescind the meeting is attached as [\[Exhibit 31, App'x 5, pp 783-785\]](#).

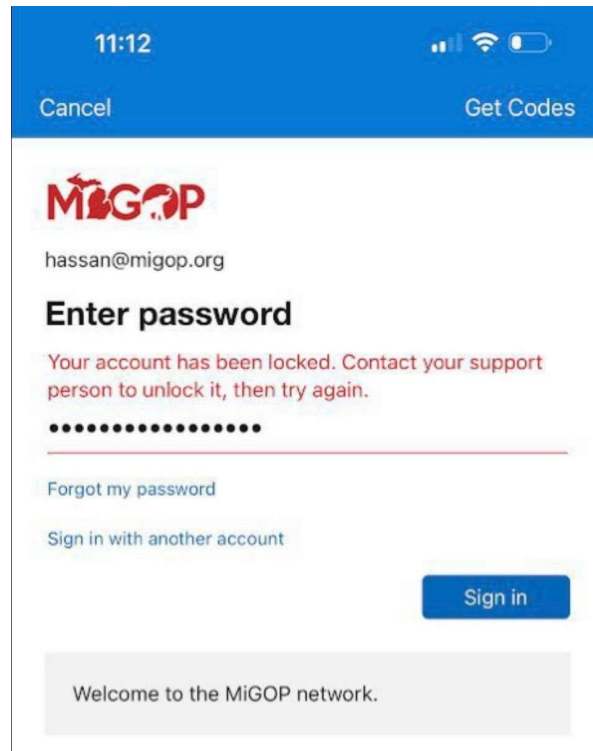
**20. ADJOURNMENT**

The meeting was adjourned at 4:36 PM.

**21. FORMAL REQUEST TO RNC and REQUEST FOR PROMPT REPLY**

The members of the Committee who acted to remove Karamo, Hartman, and others formally request RNC intervene and make a public announcement or issue a press release stating that the bylaws were followed, the January 6 meeting was legitimate, and Karamo and Hartman were removed.

She has also started to exact revenge on Committee members. For instance, Hassan Nehme (a Muslim) who is the Coalitions Vice Chair and who seconded the motion to remove Jim Copas was locked out of his email account today. We expect this retribution to continue. We need the RNC to step in and protect these Committee members who stood up to Karamo so that we can focus on winning in 2024, rather than the expected fighting and chaos Karamo will cause.



Following the meeting, Karamo has appeared on multiple media shows and flooded the MRP twitter account @MIGOP.







**Michigan GOP** @MIGOP · Jan 7



This is more fake news. Chairwoman Karamo and her administration are taking the appropriate action to hold Malinda Pego and her co-conspirators accountable. They will be dealt with swiftly and accordingly, based on the rules of the MI GOP bylaws.



**Laura Loomer** @LauraLoomer · Jan 6

JUST IN: Following the vote to remove @MIGOP Chairwoman @KristinaKaramo today, the Michigan GOP's new acting Chair Malinda Pego sent out the following statement tonight.  
[twitter.com/lauraloomer/st...](https://twitter.com/lauraloomer/st...)

FOR IMMEDIATE RELEASE

Commerce Twp., MI:  
The Michigan Republican State Committee, including former General Counsel Daniel Hartman, convened today to discuss previously requested issues including transparency and accountability regarding party leadership.

Petitions with the required signatures requesting the meeting and vote to remove former Chairwoman Kristina Karamo and former General Counsel were submitted accordingly and pursuant to the Michigan Republican State Committee Bylaws before the vote was taken and passed with over the needed threshold.

Malinda Pego is now the Acting Chair of the Michigan Republican State Committee.

The Michigan Republican Party remains steadfast in its commitment to operate with the highest integrity and ethics.



44



31



32



25K



Karamo has refused to turn over control of the MRP website (<https://migop.org/>) as instructed. She has refused to turn over documents or passwords. Instead, she has placed a banner on the top of the website stating "Press Release: January 6, 2024 – a small faction of State Committee members stated an illegitimate gathering to claim removal of Chairwoman Kristina Karamo."

Karamo has removed all reference to Malinda Pego as co-chair from the MRP website. The website now lists only Karamo under the "Leadership" tab.

<https://migop.org/about#leadership>

MIGOP

## LEADERSHIP

Chairwoman Kristina Karamo was elected to lead the Michigan Republican Party on February 18, 2023.



**KRISTINA KARAMO**

CHAIRWOMAN  
[kristina@migop.org](mailto:kristina@migop.org)

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MIGOP

## VICE CHAIRS

In fact, at a meeting on January 8, 2024, Karamo stated that she accepted the resignation of Malinda Pego.



**R Morris Owens is with C J  
Chuck Ritchard and 27 others.**



1h · 🌐

**Malinda Reese Pego's** resignation as co-chair of MIGOP was accepted by Kristina Karamo today. Malinda has been removed from the [MIGOP.org](https://migop.org) website.



It is false to state that Malinda Pego resigned. Indeed, Malinda Pego disputes the claim.



DATE: January 8<sup>th</sup>, 2024  
FOR IMMEDIATE RELEASE

EMAIL: [communication@mi-gop.org](mailto:communication@mi-gop.org)

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### **ACTING CHAIR PEGO REFUTES MISINFORMATION**

LANSING, MI – Claims from former Michigan Republican Party administration regarding Malinda Pego resigning are absolutely false.

Tonight, it has come to our attention that the recently removed chair Karamo and/or her team have made several false claims to groups of delegates that our Acting Chair Malinda Pego has resigned.

These statements are entirely false. Our acting Chair, Malinda Pego, is absolutely committed to serving and supporting our Michigan Republican Party through 2024 and beyond.

*"Although some seek to divide, now is the time for our party to come together and work to elect Republicans across our great state. I believe the best is yet to come."*, stated Acting Chair Malinda Pego.

###

Karamo has started to purge members of the Committee from the website. Anne DeLisle no longer appears as the District 8 chair.

MIGOP

## DISTRICT CHAIRS

1

**Sue Allor**

1stDistrictChair@gmail.com  
[Website](#)

2

**Andy Sebolt**

andysebolt@yahoo.com

3

**Chip Netzel**

netzelchip@gmail.com

4

**Kendall Beyer**

kenbeyer@protonmail.com

5

**JD Glaser**

6

**Hima Kolanagireddy**

chair@6cdrc.org  
[Website](#)

7

**Daniel Wholihan**

dwhol@sbcglobal.net

8

\*

9

**Deb Ross**

debr@midistrict9.org  
[Website](#)

10

**Barb Zinner**

bmzinner@yahoo.com

11

**William Rauwerdink**

rauwerdink@aol.com

12

**Jessica Toth**

jtoth414@gmail.com

13

**Cheryl Costantino**

ccostantino08@gmail.com

Karamo has started to purge county committees from the website. Hillsdale and Kalamazoo County committees no longer appear on the website.

**GRATIOT**

**Chuck Murphy**

chuckmurphy\_2000@yahoo.com

[Website](#)

**HOUGHTON**

**Dan Holcomb**

votewdh@gmail.com

**HURON**

**Larry Leipprandt**

lleipprandt@gmail.com

**INGHAM**

**Mary Shinkle**

maryshinkle705@gmail.com

[Website](#)

**IONIA**

**Tim Ross**

uofmtim@gmail.com

[Website](#)

**IOSCO**

**David Chandler**

david\_chandler@outlook.com

[Website](#)

**IRON**

**Patricia Ashraft**

pashcraft88@gmail.com

**ISABELLA**

**Dawn Betha**

dawnbetha@yahoo.com

[Website](#)

**JACKSON**

**Russ Jennings**

Secretary@jxngop.org

[Website](#)

**KALKASKA**

**Kohn Fisher**

kfisher85@gmail.com

**KENT**

**John Schaut**

Chair@kentcountygop.com

[Website](#)

**LAKE**

**Joan Runnels**

deerlady88@gmail.com

## **22. CONCLUSION; NEW WEBSITE and FUTURE SPECIAL MEETING TO ELECT NEW CHAIR**

Acting chair Malinda Pego has subsequently been forced to create a new website <https://mi-gop.org/>.

Karamo has refused to comply with the notice of removal and has failed to return property or passwords.

ARTICLE IV(G)(4) states:

Selection Of Successor. In the event of the removal of an officer, a successor shall be selected at the next meeting of the Committee, which meeting shall be in part called for that purpose. Upon removal, an officer shall not be eligible to become a member of this Committee for the remainder of the term of office for which such officer was removed.

This memorandum respectfully requests that the RNC declare that all pertinent rules were followed to amend the bylaws, call a special meeting on January 6, 2024, and remove Karamo, Hartman, and others.

This memorandum respectfully requests that the RNC declare Malinda Pego the acting chair of MRP pending a future special meeting to elect a new chair.

It is time to end the chaos in Michigan created by the Karamo administration.