

Memo To: State Executive Committee, Republican Party of Minnesota
From: Andy Bradrick, on behalf of the Otter Tail County Grassroots
Date: March 8, 2024
Subject: Response to Memo from David Hann, Chairman, Republican Party of Minnesota - dated March 5, 2024

In reviewing events surrounding the February 27th caucuses held by the Republican Party in Otter Tail County, Chair Hann's central point is that no legitimate elections occurred. As someone closely involved in the events in question, I would like to make some general observations as well.

I, as do many others involved in the Grassroots movement, have an extensive record of serving and supporting the Republican Party. We are not anarchists, bent on destroying all established order, but rather a diverse group of individuals fundamentally united by the belief that good government derives its just power from the consent of the governed. We cherish the principles outlined in the Republican Platform. We agree with the State Party constitution and the need for a well ordered organization, and process for endorsing candidates.

However, we vehemently object to recent assertions made by Party leaders requiring delegates to affirm blind allegiance for all candidates who may eventually be endorsed by the process. Candidates can deviate in ethics and principle. Political processes can be skewed or manipulated. We maintain that it is possible to support the Party and its Platform as a whole, while objecting to a few individual candidates.

The events that unfolded on caucus night did not happen in isolation. In 2022, we addressed concerns about documented Otter Tail County caucus irregularities to the State Executive Committee. Chair Hann responded, calling for "a full, fair, and transparent credentials vetting process." However, this never transpired. This unaddressed issue fueled the candidacy of Nathan Miller for State Senate, and provided a form of protest with his write-in campaign in the general election.

Last year, thirty-three members of the party were denounced as Non-Republicans with unsubstantiated charges and, without prior notice, were stripped of voting privileges by OTC's Leadership Committee. This action, occurring days before the County Convention, was unsupported by the current BPOU and State Party Constitutions. At the County Convention a new BPOU Constitution and Bylaws were narrowly passed while duly elected delegates were barred from participation. Numerous points of order seeking to address these concerns during the convention were dismissed without a ruling from the Convention Chair or Parliamentarian.

Additionally, the OTC BPOU has conducted closed meetings for nearly two years, and excluded any dissenting opinions or minority participation.

In response to this exclusion, a Grassroots movement was spawned holding monthly meetings focused on educating and informing disenfranchised Republicans about the political process and upcoming events. Prior to caucus, seasoned Republican leaders held introductory education sessions for people new to the political process. Over 300 people were trained on how to become involved at caucus, using materials made available on the MNGOP website. OTC Leadership was aware of this activity and representatives attended our monthly meetings and took copious notes.

What took place the night of caucus was initially confrontational, not because the Grassroots movement was intent on disrupting the process, but because, in my opinion, the BPOU leadership violated state law and the Republican Party rules, and procedurally blocked participation outlined in MNGOP's caucus script. However, this did not hinder the precincts from conducting their business and legitimately holding elections.

1. The BPOU held caucuses in locations far removed from the regular polling place of each precinct (see State Statute 202A.15, Subd. 2). Instead of holding caucuses in seven locations around the county (as the DFL did, and has historically been the GOP's practice), the OTC BPOU assembled 43 precincts in Perham, and 48 precincts in Fergus Falls. This restructuring of caucus sites directly contributed to the problem with noise and management on caucus night.
2. The BPOU refused to follow State Statute, Robert's Rules of Order, and party rules in the manner in which the caucus was conducted (State Statute 202A.18, Subd. 5). The initial point of disruption at both caucus locations was a debate on whether or not an election for a permanent chair was in order.
 - a. State Statute specifies, "The convener shall be the **temporary** chair of the caucus" (MN Statute 202A.18, Subd. 1 – emphasis added).
 - b. MNGOP's caucus script directs the convener to say, "Nominations are now open for the permanent Chair of tonight's caucus. This is not the election for Precinct Chair. . ."
 - c. Chair Hann in his phone conversation with Tami Barry, acknowledged that this election for a permanent chair other than the convener is provided for, but highly unusual. The BPOU appointed convener lost this vote 183 to 39.
 - d. The failure of the Party's appointed conveners to follow State Statute, Robert's Rules, and MNGOP's Caucus Script initiated the conflict at both caucus sites in OTC.

3. The BPOU obstructed the certification of precinct elections (State Statute 202A.18, Subd. 4). At both caucus sites the Precinct Registration and Certificate of Elections (PCRC) forms were intentionally withheld from all precinct envelopes. The BPOU Secretary stated that the PCRC forms were withheld because the BPOU had other plans. At the Fergus Falls caucus, the BPOU appointed convener, Harry Merickel, and the temporary secretary left the site without filling out PCRC forms to certify the elections. After learning about the convener's failure to certify elections in Fergus Falls, the BPOU made no attempt to contact precinct officers in order to certify their own precinct's election results submitted on caucus night. This is a blatant failure by the BPOU to perform their statutory obligation, a failure that many individuals believe the State Party should still rectify.
4. The BPOU created a Registration Form which added requirements to the MNGOP's recommended Registration Form. Specifically, the BPOU required participants to sign a statement agreeing with OTC's bylaws which establish requirements inconsistent with MNGOP's bylaws. This inconsistency is prohibited by the MNGOP Constitution. (Republican Party of Minnesota Constitution, Article IV, Sect. 2 and, Article XVI, Sect. 1)
5. Finally, the action taken by State Party Chairman David Hann delegitimizing all elections held at the Republican caucuses in Otter Tail County appears to violate the MNGOP Constitution. Article II, Section 3 states, "Nothing in this Constitution shall be construed to deny or abridge the rights of any voter to participate in any Party caucus, primary or convention, where is entitled by law to participate." (Republican Party of Minnesota Constitution, Article II, Sect. 3)

It would be helpful in understanding the events that transpired at Otter Tail County's Republican caucuses if I responded to the specific points of concern raised in Chair Hann's memo:

1. **Perham identical times & signatures** – The OTC BPOU withheld all PCRC forms from precinct envelopes the night of caucus. When Tami Barry, the elected chair in Perham, reviewed precinct documents she discovered this omission. The elected chair and secretary, along with the BPOU Secretary acting as a witness, proceeded to review Precinct Sign In lists and certify the precinct elections. Any clerical corrections were initialed by all three parties. Since minutes were not submitted by the precincts, the elected secretary used his time notations documented on the caucus script to fill out PCRC forms. The BPOU secretary verified these times.
2. **Perham time stamp** - Tami Barry spoke twice with the MNGOP Executive Director, Anna Matthews. Ms. Barry was interrupted both times by Tommy

Merickel, the appointed chair, to take these calls on his phone. In the first conversation Ms. Matthews questioned whether Ms. Barry had been trained. Ms. Barry responded that she had gone through the State Party training three times (a fact that Anna Mathews knowingly misrepresented in an interview with the Fergus Falls Journal several days later.) Ms. Matthews called a second time and, Ms. Barry briefly stated that she was busy overseeing caucus business and would not talk further.

3. **Perham attendee's notations** – This information would have been helpful for filling out certification forms if the BPOU had made the PCRC's available to the precincts. In the State Party's review of documents it appears that they are intent on discrediting the precinct election results reported on the Attendee Sign In sheets. Has the State Party applied the same scrutiny to the other 119 BPOU's caucus documents?
4. **Perham caucus noise** – The venue for the caucus was a food court with 222 people from 43 precincts trying to conduct business. After the initial debate about elections for chair, the caucus proceeded smoothly except that Tommy Merickel repeatedly disrupted the meeting and neighboring precinct tables with threats that caucus results would be disqualified. Throughout the evening the chair continued to give instructions to precincts about conducting their business.
5. **Unsigned registration forms** – At both caucus locations the legal requirements for participation found in State Statute and MNGOP's bylaws were read aloud from the caucus script. The script then inquired, "Is there anyone here who is not in agreement with the principles of the Republican Party, or who has not voted or affiliated with the Party in the last general election, or does not intend to vote or affiliate with the Party in the next general election?" Participation was an indication of agreement with the stated legal requirements. In the bustle of events leading to Ms. Barry being elected chair, she neglected to complete her Registration Form. While reviewing precinct documents, she noted this to the BPOU Secretary who verified that she had signed the Precinct Attendee Sign in Sheet.
6. **Two different forms** - Chair Hann fails to mention that the second version of the Registration Form was produced by MNGOP. The justification for preferring this form was simple. If the requirements for participation found on the OTC BPOU's Registration Form were consistent with the MNGOP's Bylaws, the participants would have had no objection. Instead, they reasoned that by signing the BPOU's version they bound themselves to OTC's overreaching requirements, something that was rejected at the last 7th Congressional District Convention.

7. **Crossed Out Sections** – Chair Hann raises a valid question. Why would attendees want to be OTC delegates? The BPOU has a long pattern of ignoring the concerns of members and conducting closed BPOU meetings. The leadership prefers public show downs and political strong arm tactics rather than addressing concerns privately beforehand. Why do the Grassroots want to be part of the BPOU? Because we believe that by working together and including a diversity of opinions we can build a stronger party.
8. **No Fergus Falls PCRC's** - The BPOU withheld certification forms from precincts and the BPOU appointed convener and secretary left the caucus site without completing PCRC forms. Chair Hann's statement is however false. One resourceful individual happened to bring his own copy of the PCRC form and Maine Township did certify their precinct elections on caucus night. Once the BPOU's failure was pieced together by Grassroots organizers, they mobilized to collect as many certification forms as possible from precinct officers across the county. It is worth noting that they did this regardless of whether these precincts elected delegates sympathetic to their cause. Since Tami Barry had submitted Perham's documents to the BPOU secretary, organizers funneled certification forms to Ms. Barry to similarly submit.
9. **Fergus Falls times** – The appointed secretary's notes are inaccurate. At 7:15 pm the appointed chair gave instructions for precincts to begin their business. All precincts with the exception of one, wrapped up their business in short order. Aurdal Township had 33 attendees present with 16 candidates running for 9 delegate slots. Elections for delegates began at 7:45pm according the precinct chair's records. Due to the large number of delegates and votes, the results were not completed until nearly 9:15. These times meet statutory limitations.
10. **Disenfranchisement** – The omission of the BPOU chair on his Precinct Sign in Sheet was an unintentional oversight by first time caucus attendees. They stated that they did not know the person listed on the absentee form and chose not to vote for him. Other politically well-connected individuals lost precinct elections to be delegates. Chair Hann's decision to nullify all caucus elections seems to favor these individuals and disenfranchises the nearly 500 people who showed up to participate in OTC's Republican caucuses for 2024.

In conclusion, the central question of Chair Hann's letter was, did legitimate elections occur at the caucuses held in Otter Tail County? The answer has to be yes! The proper question should be, whether or not the Party successfully certified those elections. State Statute requires that caucus elections be certified to the BPOU and State Party (MN Statute 202A.18, Subd. 1). It seems clear however, that the statute does not grant political parties the prerogative of denying caucus election results.

Instead each party appears obligated to facilitate a process whereby certification of caucus elections is the end result. The Party, not the participants, failed to achieve this end. Means to remedy this situation are available, if Party leadership has a will to resolve this issue.

Finally, Chair Hann states in his memo that, “. . . the business of the caucus is fundamentally to serve the purposes of the Republican Party and aid in creating local organizations to do the political work of the Party.” This premise highlights the fundamental difference between a “Grassroots” and an “Elitist” view of the Party. A “Grassroots” view would state, “The business of the caucus is to regenerate the Republican Party and create local organizations which will conduct the work of the Party.” I would suggest that the latter premise is more consistent with the welcoming spirit of the preamble and first two articles of the Republican Party of Minnesota Constitution.

It is our heartfelt desire to participate in building a Republican Party that is faithful to its Statement of Principles, ethical in its conduct, and dedicated to the maintenance of government by and for the people according to the Constitution of the United States and the State of Minnesota.

We therefore request the State Executive Committee to review the findings of Chairman David Hann in light of this response and any other investigation that they deem necessary, and reverse the Chair’s decision by directing that all precinct elections conducted at the Republican caucuses in Otter Tail County on February 27th, 2024 be certified by the Party no later than 21 days prior to the Republican Party of Otter Tail County’s BPOU Convention and subsequently recognized by the Republican Party of Minnesota and, the Republican Party of Otter Tail County.

This letter was unanimously approved by 104 participants at an Otter Tail County Grassroots meeting held March 7, 2024