

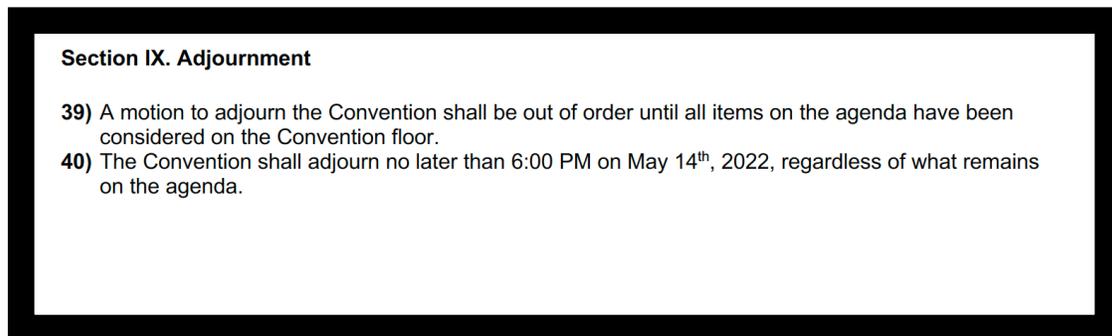
**Attached please find
The Proposal for Removal of the Chair
Which includes a
Detailed Statement of Charges
Presented to the Chair
by Delegates and Alternates
to the State Central Committee
More than 10 days prior to
The State Central Meeting
To be held on
December 9, 2023
As required by
Article XVI General Provision
Section 2 Removals**

**List of Violations,
Including Specific Events and Actions,
Related to the Proposal for Removal**

**Be it resolved:
The Chair of the Republican Party of Minnesota
shall be removed from office immediately.**

Per MNGOP procedures, and following due consideration of facts and circumstances presented by delegates and responses by the Chair relating to:

- 1) The Chair's violation of duty to The Republican Party of Minnesota by:
 - a) Violating the rights of State Convention Delegates on May 14, 2022 by continuing to attempt to address business after the mandatory adjournment at 6pm. The Rules as approved on May 13, 2022 REQUIRED adjournment no later than 6pm on May 14th, 2022, regardless of what remains on the agenda.****



Once the rules were adopted, Rule 4 required a 2/3 vote of the Convention to amend the Rules, including the adjournment time.

REPUBLICAN PARTY OF MINNESOTA

2022 State Convention – May 13 & 14

PROPOSED RULES

Preface

The Constitution of the Republican Party of Minnesota (the “Constitution”) mandates several Convention rules that can neither be debated nor amended.

Section I. General

- 1) The business of this Convention shall be as outlined on the Official Agenda for the Convention, which will be adopted by a majority vote.
- 2) **Article XVII** of the Constitution states:
The rules contained in the current edition of “Robert’s Rules of Order Newly Revised” shall govern the Convention in all cases to which they are applicable and in which they are not inconsistent with the constitution and bylaws of the Republican Party of Minnesota, statutes of the State of Minnesota, or any special rules of order the party may adopt.
- 3) **Article V, Section 4**, of the Constitution provides:
Once the temporary organization has been established, the first order of business of a state or Congressional district convention shall be the seating of alternates. The permanent voting roll of the convention shall be composed of the delegates of each BPOU who actually are present, and in the absence of any delegate to the convention, an alternate shall be seated in his/her stead during his/her absence according to the procedure established by the constitution or bylaws of the BPOU. When a delegate returns to the floor of the convention, he or she will be seated immediately.
- 4) Once adopted, these Rules shall neither be amended nor suspended except by a two-thirds (2/3) vote of the Convention.

The minutes of Day 2 of the State Convention determined the official voting strength of the Convention to be 2216. (See Minutes at 9:23.)

State convention minutes day 2

9:04 (AM): Convention called back to order

9:10: Pledge, National Anthem, and Invocation.

9:23: Credentials report. Voting strength numbers have not changed. 2216 is the official voting strength.

There is a gap in the minutes from 17:39, which is when Jensen received the official endorsement, and 17:55. During these 16 minutes, Delegates were instructed to return their clickers as they left the building. Many Delegates and Alternates left the building, leaving their clickers as instructed. At 17:55, the minutes indicate there was a motion and second to change the end time to 7:00pm.

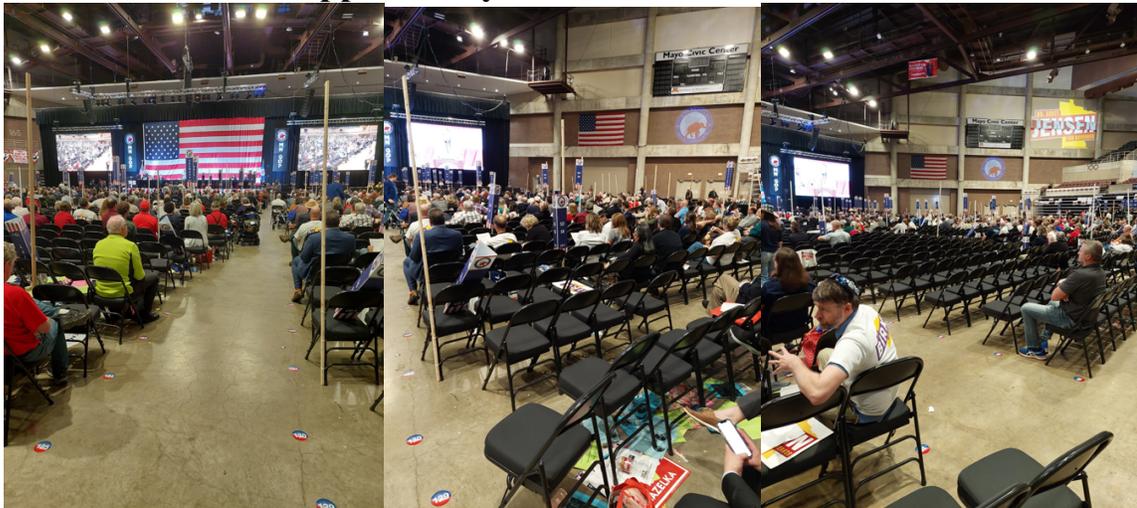
17:55: Motion and second to amend the rules to change the end time to 7:00pm.

17:59: Constitution report forwarded as a block. Debate ensues.

18:11: Constitution amendments pass as a block based on a majority vote.

There was arguing on the floor because there was a mandatory adjournment and there was a clear issue with voting strength as so many

Delegates and Alternates had left the venue. As indicated in the minutes, there was a vote and a second BUT THERE IS NO RECORD OF DEBATE, NO MOTION TO CALL THE QUESTION AND NO RECORD OF A VOTE TO AMEND THE RULES. In order to amend the rules to extend the meeting, there would need to have been a vote with 2/3 of the voting strength of 2216 voting for the extension. The fact that the minutes do not reflect a vote is proof that the meeting was not extended. Any business that happened after 6pm is not official and must be considered invalid. The Party was out of order in its efforts. There were Delegates challenging the extension and the Party ignored efforts to challenge the process using Robert's Rules. This means that the proposed changes to the Constitution were not properly brought before the body and have not been approved by the State Convention.



The Party has undermined the State Convention by asserting official business occurred in violation of the Rules. The Chair filed documents with the Secretary of State's Office indicating that amendments to the Constitution were passed after the meeting's required adjournment, a violation of MN Statutes (see related charge, below). The constitutional amendment extending the certification of the affiliates was not properly considered during the official meeting so did not happen. The effort to provide initial certification of the Hispanic Republican Assembly of Minnesota was also not in order and did not happen.

- i) The Chair, as the former Senate Minority Leader, has extensive knowledge of Robert's Rules and also the procedures required by the Republican Party of Minnesota Constitution and Bylaws. His decision to ignore the Rules as passed by the Convention and to abuse the process in order to perform business related to the affiliates in his own self-interest merits his removal as Chair. Any assertions that the post-6pm business was valid serve to further erode any confidence in his integrity and in his competence to be Chair.***

(1) Please provide an explanation as to how the Party Officers believed this meeting was NOT adjourned as required at 6pm.

(2) Please explain how the minutes taken do not support adjournment.

(3) Please acknowledge the Party Rules as presented in this charging document accurately reflect the understanding of the Delegates on May 14, 2022.

(4) Please provide a plan to remedy the false information submitted to the MN Secretary of State regarding the amendments to the Constitution.

b) Closing State Executive Board Meetings to prevent attendance of Delegates, Alternates and the members of the Republican Party, thereby eliminating transparency and interfering with the right and duty of State Central Committee Delegates to provide oversight of the Party Officers and State Executive Board;

i) On February 17, 2022, at a State Executive Board meeting, there was a discussion about closed door meetings of the State executive Committee. A mere 4 months after his election as Chair, David Hann made the point that closed door meetings “engender a spirit of trust and confidence” suggesting this was necessary for members to be able to speak their minds. There was a motion to maintain open meetings of the State Executive Committee. The motion FAILED and the meetings have been closed to uninvited observers since that meeting.

STATE EXECUTIVE COMMITTEE MEETING
Thursday, February 17th 2022 — 6:30PM

Members Present:

David Hann	RPM Chair
Donna Bergstrom	RPM Deputy Chair
Lee Prinkkila	RPM Treasurer
Dave Pascoe	RPM Secretary
Barb Sutter	RNC Committeewoman
Alex Plechash	RNC Committeeman
Paul Lenz, voting member (Zoom)	1st Congressional District
Jeff Schuette, Chair/voting member	2nd Congressional District
Patti Meier, Chair/voting member	3rd Congressional District
Sara Rasque-Michener, voting member	4th Congressional District
Alec Beck, Chair/voting member	5th Congressional District
Jim Newberger alternate	6th Congressional District
Bill Nichol, voting member	7th Congressional District
Keri Heintzeman, voting member	8th Congressional District

Staff: Andy Aplikowski, Mike Lonergan, Ron Huettl

6:30 Meeting called to order by the Chair

6:33 Pledge and Invocation

6:33 Approval of agenda

6:34 General discussion about closed door meetings, the Chair made the point that we are trying to engender a spirit of trust and confidence to be able to speak their mind. Bill Nichol, Dave Pascoe, and Alex Plechash wanted to go on record to say that they believed that the meetings should be open.

6:52 Motion by Heintzman, second by Nichol to maintain the openness of our meetings to announced state central committee delegates except during executive session as has been the practice. Motion fails.

(1) Please provide information about why the State Executive Board voted to no longer hold open meetings and whether there has been a vote since 2/17/22 to once again maintain open meetings.

c) Mismanaging contributions to the MNGOP at the federal and state level, thereby jeopardizing the party's ability to raise funds and receive National Committee transfers in 2024;

i) While the Party had paid off millions of dollars in debt between 2017 and 2021, the MNGOP is again in debt nearly \$400,000. The Chair has a duty to be fiscally prudent and he failed.

(1) Please provide detailed information about new debt incurred and all loans secured by the MNGOP between 1/1/2022 and 11/1/2023.

ii) There were 11 Affiliate groups certified by the State Central Committee in April 2021. The MNGOP should treat the affiliate groups in the same manner: the support offered should be similar and the requirements and expectations should be applied equally. The Chair has a duty to be fiscally prudent and he failed.

(1) In 2022, how many dinners/ events were funded/hosted by the MNGOP to support each specific affiliate group? Please provide a list of each affiliate event, noting

the date of each event.

(2) For each event, please provide the following: the Party officers, staff and candidates who attended each event and detailed lists of both expenditures/disbursements and contributions/ revenue generated for each of these events.

(3) Please provide information about plans for affiliate events in 2024.

iii) The State Convention and State Central Meetings were held May 12-14, 2023, in Rochester at the Mayo Civic Center. The Party incurred expenses of \$52,000 for electronic voting.¹ The Chair has a duty to be fiscally prudent and he failed.

(1) Please provide documentation of bids received related to this expense and an explanation as to why the Party required electronic voting systems, rather than using tellers, as was the custom for decades.

(2) Please provide estimates for expenses in 2024.

iv) The Civic Center has the capabilities to host events with very complicated audio/visual system needs. The Party incurred expenses of more than \$128,000 for Audio Visual Services during the State Convention.² The Chair has a duty to be fiscally prudent and he failed.

(1) Please provide details regarding this expenditure, including bids received for this service as well as the costs that would have been incurred if the audio-visual system available at the convention center had been utilized.

(2) Please provide estimates for expenses in 2024.

v) The Party has been engaged in litigation regarding several issues. The Chair has a duty to be fiscally prudent and he failed.

(1) Please provide information, (including case number for matters in any court system, regarding all litigation INITIATED by the Party, including law firms used at the BPOU, Congressional District and State Party levels; the names of the attorneys working on behalf of the Party and each attorney's billable rate; all costs incurred and remaining debt for each matter; current status of the litigation and expected resolution.

(2) Please provide information about all litigation naming the MNGOP as a respondent/ defendant, including case numbers, the names of all law firms utilized by the Republican Party and its subunits; the billable hourly rate for each attorney involved in litigation; all expenses incurred regarding all litigation between 01/01/2022 and 11/30/2023 and expected outcomes.

vi) There are grave concerns regarding the possible misappropriation of funds received

¹ MN CFB Year End Report 2022 re Padgett Communications.

² MN CFB Year End Report 2022 re Event Consulting, LLC

by the Republican Party of Minnesota from the National Republican Congressional Committee (NRCC) during the 2022 election cycle. If the Party used funds allocated by the NRCC for non-allocable congressional mail, this diversion of funds would raise ethical and legal concerns and would warrant a thorough investigation and possible remedial measures. The most recent FEC filing shows a debt to Camelback Strategy for approximately \$90,000 related to the 2022 election cycle.³ Camelback is known to do non-allocable mail for congressional candidates in Minnesota.

(1) Please provide documentation regarding the debt owed to Camelback Strategy and information about the concerns related to funds allocated by the NRCC for non-allocable congressional mail.

vii) The Party sought funds to audit the source code of the election voting systems.

(1) Please provide information about funds collected for that effort.

d) Taking action to directly disenfranchise delegates and alternates and to support the disenfranchisement of delegates and alternates who were properly elected to BPOUs, Congressional Districts, the State Central Committee and the State Convention, thereby causing harm to those delegates and alternates and to members of the Republican Party;

i) In 2022 and 2023, there were duly elected Delegates from precincts in multiple BPOUs who were prevented from participating in their BPOU conventions.

(1) Please provide information about every instance of Delegate removal about which you were or are aware, as well as information about Delegates who were suspended and therefore denied the opportunity to participate in their BPOU convention;

(2) Please provide information about all legal services and advice secured by attorneys working on behalf of the Party Officers or subunits, including the name of the attorney and the billable rate charged by the attorneys;

(3) Please provide copies of letters drafted by any Attorneys related to Delegate removal as well as information about the applicability of Robert's Rules to these removals;

(4) Please explain your position on those delegates removed / suspended in the past and how those individuals will be treated going forward.

e) Failing to responsibly manage Party resources, including financial resources, data and volunteers, in a manner that reflects the requirements of Minnesota Statutes, and the Constitution and Bylaws of the Republican Party:

i) Throughout the endorsement process in 2022, statewide candidates were provided

³ FEC Filing by the Republican Party of Minnesota dated 10/31/2023 re Camelback Strategy debt.

with incomplete and inaccurate information about delegates and alternates. The Party's failure to provide the same information to different candidates and the Party's failure to correct misinformation in the lists, undermined the trust in the Party. Additionally, the extremist list agreements required by the Chair and the State Executive Board interfere with candidates efforts to use volunteers to reach out to delegates.

(1) Please explain why the delegate and alternate lists were inaccurate and incomplete.

(2) Please provide information that demonstrate how the Party will ensure that all data related to Delegates and Alternates will be properly proofed, complete and consistently shared with candidates. Include in your response who is responsible for ensuring all data has been updated and verified.

ii) Delegates to the State Central Committee have the right to receive the list of State Central Delegates and Alternates for the purpose of calling a State Central Meeting. Delegates also have the right to have the list for ANY purpose related to the oversight of the State Executive Board and the State officers because the delegates are required to provide oversight. The Delegates who attempted to call a meeting in the late Summer, early Fall of 2023 were denied access to the list- some for weeks- and were given false information by Party officers about the duty of those officers to share the data. Additionally, the list agreement the Delegates were required to sign was inaccurate and not intended for Delegates.

(1) Please explain why Party Officers were unaware of their duty to provide lists to Delegates.

(2) Please explain why there can be a delay in the provision of the delegate lists when every officer should have the list available at all times.

(3) Please share the list agreement with all Delegates. Explain who is responsible to ensure the list agreement required of the State Central Delegates by the State Executive Board is accurate and reflects the right of Delegates to communicate with other Delegates and Alternates.

(4) Please explain what procedures have been put in place to ensure the Delegates will have timely and full access to the Delegate and Alternate list going forward.

iii) The Chair had a duty to responsibly manage all Party resources so as to maximize the available support for subunits and candidates in 2022. The Chair failed. These failures contributed to the political losses in 2022, the disastrous legislative session during which innumerable changes were made to Minnesota Statutes and the Trifecta which will continue to wreak havoc for Republicans across Minnesota.

(1) Please provide information about the Party's use of volunteers in 2022 related to canvassing, phone calling, data entry, etc.

(2) Please explain how many volunteers the Party currently uses on a weekly and monthly basis: How many volunteers are providing assistance to the Party on a

regular basis? Who coordinates volunteers related to canvassing? Who is responsible for updating the status of volunteers based upon signups at events? Who verifies the willingness of volunteers to complete various tasks? Who is responsible for ensuring Party data is accurate and current? Who is responsible for updating data that has been changed?

(3) Please provide an explanation as to why the Party failed to provide information about multiple legislative proposals to alter laws specifically related to Major Parties. Please explain why the Party did not communicate the need for Republican voters to contact their representatives about legislative changes that have altered the state of Minnesota and are causing harm to Minnesotans.

(4) Please provide a plan for the upcoming legislative session that explains how the Party will ensure it is both aware of critical legislative proposals that will likely further erode the rights of Minnesotans and how the party will promptly and accurately inform its members about these issues and ways to influence the legislative process.

2) The Chair has violated multiple Minnesota Statutes, including but not limited to:

a) MN Statutes §5.15 ONLINE SIGNATURES, ACKNOWLEDGMENT OR NOTARIZATION ON DOCUMENTS; PENALTIES OF PERJURY. Under this statute, a person who signs and submits a document to the MN Secretary of State knowing that the document is false in any material respect is subject to the penalties of perjury set forth in section [609.48](#). The penalty for violating this statute constitutes a felony and can result in imprisonment of not more than 5 years or payment of a fine of not more than \$10,000.

i) The Chair has knowingly filed multiple documents with the MN Secretary of State that were back-dated, were altered to indicate actions were taken by the State Convention that did not occur and included false information about the status of affiliates.⁴

(1) Please explain how the letter sent to the Secretary of State on August 28, 2023, was backdated to February 1, 2022.

(2) Please explain who altered the August 28, 2023, letter sent to the MN Secretary of State on August 29, 2023, to be backdated February 1, 2023.

(3) Who was responsible for proofing/ assembling the submissions to the MN Secretary of State on both August 28 that included an addendum dated August 11, 2023. August 11, 2023, is after both February 1, 2022 and February 1, 2023.

(4) Who altered the information on the submitted addendum that states: "Affiliate list certified at May 2022 State Convention" because the Constitution of the

⁴ See letters submitted to the MN Secretary of state on August 28, 2023, August 29, 2023 and September 11, 2023.

Republican Party, Article XIV, Section 2 specifically requires the State Central Committee to certify the affiliates. Neither the State Central Committee nor the State Convention certified the affiliates in May 2022.

(5) Please explain why documents were filed with the MN Secretary of State stating the affiliates were recertified in May 2022 when, in fact, there were NO certified affiliates at the time of the filing of the documents in August and September 2023 because the certification for all affiliated had lapsed.

(6) Please provide information about the plan to correct the misinformation filed with the MN Secretary of State to ensure that the documents filed accurately reflect the facts related to the affiliates.

b) MN Statute §200.02 Subd. 7. Major political party. (a) "Major political party" means a political party that maintains a party organization in the state; has complied with the party's constitution and rules; is in compliance with the requirements of sections [202A.12](#) and [202A.13](#); files with the secretary of state no later than December 1 of each odd-numbered year a certification that the party has met the foregoing requirements, including a list of the dates and locations of each convention held; and meets all other qualification requirements of this subdivision. Paragraph (e) of this statute states: "A major political party that does not submit the certification required by this subdivision loses major party status on December 31 of the year in which the party did not file the certification." Filing a false document NULLIFIES the filed document and is a FELONY. The Party is not in compliance with its constitution and rules. The party is NOT IN COMPLIANCE with MN Statutes §§ 202A.12 and 202A.13 (See below).

i) The Chair was provided with a clear and simple plan to bring the Republican Party of Minnesota into compliance with MN State Law and the Party's constitution and rules. The delegates and alternates were each sent multiple emails that also provided a clear and simple plan to come into compliance. Rather than address the issues and solve the problems, the Chair and members of the State Executive Committee chose to provide false information to the delegates and alternates about the impending violation has knowingly and intentionally filed multiple false documents with the MN Secretary of State. The filing of a false document creates a failure to comply with this statute, passed in May 2023. The Chair is required to CERTIFY UNDER PENALTY OF PERJURY the Party is in compliance with its Party constitution and rules, MN Statutes 202A.12 and 202A.13. For all of the reasons listed in this document, the Chair has flagrantly filed a false certification and then used the fact that the MN Secretary of State accepted his filing as proof that the Party has secured Major Party Status. Party Officers and members of the State executive Board have publicly stated that it does not matter if he filed a false document because nobody is going to know. WE ALL KNOW!! The Chair and some members of the State Executive Board are actively directing Delegates and Alternates to be complicit in their effort to hide their failings.

- (1) Please acknowledge the Certification of Compliance MUST BE TRUTHFUL.*
- (2) Please acknowledge the Chair is subject to criminal prosecution under MN Statute 5.15 for every document filed with the MN SOS that is not factual.*
- (3) Please acknowledge the Secretary of State has a duty to accept the documents filed by the Chair of the Party but makes NO DETERMINATION as to the truthfulness of the Chair's submission.*
- (4) Please acknowledge a FALSE CERTIFICATION is NOT IN COMPLIANCE with the requirements of this statute.*
- (5) Please acknowledge that if, at ANY TIME AFTER DECEMBER 1, 2023, the documents filed with the Secretary of State are determined to be not factual, the Republican Party of Minnesota could be STRIPPED OF MAJOR PARTY STATUS.*
- (6) Please acknowledge your recognition that no Delegate or Alternate should support, condone or ignore any instance when the Chair or member of the State Executive Board violates MN State Law or the Party's constitution or rules.*
- (7) Please provide your plan for correcting all false information filed with the Secretary of State.*

c) MN Statute §202A.12 State Convention, Authority of, Subdivision 1 states: Time of convention. The final authority over the affairs of each major political party is vested in the party's state convention to be held at least once every state general election year at the call of the state central committee.

i) The Chair has failed to recognize the State Convention retains authority over him and has jeopardized the Party's financial and political standing by his actions, which include initiating Court actions against members of the Republican Party without authorization from the State Convention.

- (1) Please acknowledge the fact that the State Convention- which means the State Convention Delegates and seated Alternates, have the final authority over the affairs of the Party, which means that all disputes about intraparty matters must be brought to the State Convention for resolution.*
- (2) Please acknowledge the fact that the Chair has NO AUTHORITY to initiate litigation against the subunits, affiliates or a member of the Republican Party without the clear permission of the State Convention.*
- (3) Please acknowledge the responsibility of the Chair to ensure that the subunits and affiliates of the Party comply with all MN state law and the Party documents.*
- (4) Please provide information about all matters known to you, that occurred during your tenure as Chair, that violate MN Statute §202A.12 and include your plan to*

remedy all violations by calling an immediate State Convention.

d) MN Statute §202A.12 State Convention, Authority of, Subd. 2, State central committee states: Subject to the control of the state convention the general management of the affairs of the state party is vested in the party's state central committee.

i) The Chair has failed to recognize the State Central Committee has authority over his actions and has engaged in behavior which has undermined the State Central Committee's duty to provide oversight of his conduct. His conduct has undermined the State Central Committee and the underlying subunits of the Party and caused serious harm to the Party's political and financial infrastructure.

(1) Please acknowledge the fact that the State Central Committee has the authority to exercise general management Convention over the affairs of the Party but is "subject to the control of the state convention" which means that all disputes about the general management of the affairs of the Party must be brought to the State Convention for resolution.

(2) Please acknowledge the fact that the State Central Committee has NO AUTHORITY to initiate litigation against the subunits, affiliates or a member of the Republican Party without the clear permission of the State Convention.

(3) Please acknowledge the responsibility of the State Central Committee to ensure that the Party Officers, State Executive Board, subunits and affiliates of the Party comply with all MN State Law and the Party's governing documents.

(4) Please acknowledge it is the DUTY of the State Central Committee to provide oversight of the officers it elects and act swiftly when any officer violates MN State law or the Party's governing documents.

(5) Please acknowledge the right of the State Central Delegates to have access to all information relevant to their duty to provide oversight of the Party officers.

(6) Please acknowledge the DUTY of the State Central Committee Delegates to call a STATE CENTRAL MEETING when those Delegates learn the Party Officers have violated MN State law or the Party's governing documents.

(7) Please acknowledge the DUTY of the State Central Committee to call a State Convention when it becomes aware of the need to amend the party Constitution to ensure compliance with MN State law.

e) MN Statute §202A.12 State Convention, Authority of, Subd. 3. State executive committee states: The state executive committee of the party shall have charge of the administration of the party's affairs, subject to the direction and control of the state convention and the state central committee.

i) The Chair has failed to recognize the State Executive Committee is subject to the

control of the State Central Committee and the State Convention. The Chair has encouraged the State Executive Board to take action that undermines the DUTY of the State Central Committee to exercise required oversight of the Party Officers and the State Executive Board.

- (1) Please acknowledge the fact that the State Executive Committee operates under the direction of the State Central Committee which is subject to the control of the State Convention which means that all disputes about administration of the Party's affairs must be brought to the State Convention for resolution.*
- (2) Please acknowledge the fact that the State Executive Committee has NO AUTHORITY to initiate litigation against the subunits, affiliates or a member of the Republican Party without the clear permission of the State Central Committee, which should refer the matter to the State Convention.*
- (3) Please acknowledge the responsibility of each member of the State Executive Board to notify the State Central Committee delegates of their knowledge that any Party Officer, State Executive Board member, subunit or affiliate of the Party is not complying with MN State Law and/or the Party's governing documents.*
- (4) Please acknowledge the duty of each member of the State Executive Board to report identified concerns to their elective body, including their Congressional District and BPOU.*

f) MN Statute §202A.12 State Convention, Authority of Subd. 4 Constitution filing states: “The chair of the state central committee of each party shall file with the secretary of state a copy of the party's constitution and all amendments to the constitution as they are enacted.”

i) In the Spring of 2022, the Chair and Deputy Chair were notified of the fact that MN Stat §202A.12 REQUIRES Constitutions and Amendments to be filed with the MN SOS - AS THEY ARE PASSED. The last properly filed Constitution, and therefore the official Constitution of the Republican Party of MN, is the Constitution from 1988. The current Chair & Deputy Chair failed to comply with this requirement at the State Convention in 2022 & failed to convene a state convention in 2023 to address the issue. The Chair filed documents with the MN SOS in August and September which, as noted previously, are inaccurate and include false information.

- (1) Please explain why no State Convention was called to remedy all issues related to the Constitution, including the need to amend it to state that “This Constitution supersedes all previous Constitutions of the Republican party of Minnesota.”*
- (2) Please explain why false documents, which violate MN Statute §5.15, were filed with the MN SOS.*
- (3) Please provide information about the plan to correct the misinformation filed with the MN Secretary of State related to the affiliates to ensure that all documents filed comply with the rules of the Party's documents and MN State law.*
- (4) Please provide information about the plan to correct the misinformation filed with*

the MN Secretary of State related to the Party Constitution and Bylaws to ensure that the documents filed comply with Party documents and MN State Law.

3) The Chair has violated multiple provisions of the Republican Party of Minnesota Constitution, and ignored and encouraged other Party Officers, members of the State Executive Committee, Delegates and Alternates to the State Central Committee and subunits of the Party to violate those same provisions. The provisions violated include, but are not limited to:

- Article I, Section 2
- Article II, Section 1
- Article IV: Section 2
- Article V: Sections 1-6
- Article VI: Sections 1,3 and 5
- Article VII: Section 1
- Article VIII: Sections 1-3
- Article IX: Sections 1-2
- Article X: Sections 1 and 3
- Article XI: Sections 1-3
- Article XIV: Section 1-3

There are no excuses for the Chair of the Republican Party's violations of the Party Constitution.

the Delegates will vote.