

**Attached please find  
The Proposal for Removal  
of the Deputy Chair  
of the Republican Party of Minnesota**

**Presented to the Deputy 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 Deputy Chair of the Republican Party of  
Minnesota shall be removed from office  
immediately.**

**The Deputy Chair of the Republican Party of Minnesota is elected by the Delegates and Seated Alternates of the State Central Committee. The Deputy Chair serves on the State Executive Board and is responsible for filling the duties of the Chair when the Chair is unable to fulfill his duties, is absent or in the event of a vacancy in the Chair's position. The Deputy Chair MUST protect the interests of the Republican Party of Minnesota, especially when she becomes aware of malfeasance, nonfeasance or any other misconduct by any officer of the Republican Party of Minnesota.**

**The Deputy Chair has remained silent while being aware of the many concerns raised about the Chair of the Republican Party.**

**The Deputy Chair has not raised concerns with the State Executive Board or brought concerns to the Delegates of the State Central Committee.**

**The Deputy Chair has failed to step in to demand the State Executive Board exercise proper oversight over the Chair and her failures have placed the Republican Party in jeopardy.**

**The Deputy Chair's willingness to ignore the negligent and illegal conduct of the Chair demonstrates her inability to serve as the Chair of the Republican Party.**

**The Deputy Chair has lost the confidence of Delegates.**

**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 14<sup>th</sup>, 2022, regardless of what****

**remains on the agenda.**

**Section IX. Adjournment**

- 39) A motion to adjourn the Convention shall be out of order until all items on the agenda have been considered on the Convention floor.
- 40) The Convention shall adjourn no later than 6:00 PM on May 14<sup>th</sup>, 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.

**c) Mismanaging contributions to the MNGOP at the federal and state level, thereby jeopardizing the party’s ability to raise funds 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.*
- 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.*

- 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.<sup>1</sup> The Chair has a duty to be fiscally prudent and he failed.*
  - 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.<sup>2</sup> The Chair has a duty to be fiscally prudent and he failed.*
  - v) The Party has been engaged in litigation regarding several issues. The Chair has a duty to be fiscally prudent and he failed.*
  - vi) There are grave concerns regarding the possible misappropriation of funds received 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.<sup>3</sup> Camelback is known to do non-allocable mail for congressional candidates in Minnesota.*
  - vii) The Party sought funds to audit the source code of the election voting systems.*
- 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.*
- 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**

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<sup>1</sup> MN CFB Year End Report 2022 re Padgett Communications.

<sup>2</sup> MN CFB Year End Report 2022 re Event Consulting, LLC

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

**Party:**

- i) Throughout the endorsement process in 2022, statewide candidates were provided 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.*
  
  - 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.*
  
  - 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.*
- 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.<sup>4</sup>*

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



**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.*

**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.*

- 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.*
- 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.*
- 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.*
- 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.**