

**LAW OFFICES OF
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January 18, 2025

Via Email & U.S. Mail

To the Following People Improperly Holding Themselves Out as the Duly Elected Officers of the Fresno County Republican Party Central Committee:

Mr. Peter Halajian, Improperly Holding Himself Out as Chair
(peterhalajian1995@gmail.com)

Ms. Sherie Benbrook, Improperly Holding Herself Out as 1st Vice Chair
(sherie4@gmail.com and sherie4@protonmail.com)

Mr. Matt Casarez, Improperly Holding Himself Out as 2nd Vice Chair
(mattcasarez2002@gmail.com)

Mr. Eric Rollins, Improperly Holding Himself Out as Treasurer
(etr5353@comcast.net)

Ms. Karen Turgeon, Improperly Holding Herself Out as Secretary
(turgeon2@reagan.com)

RE: Demand to Immediately Cease and Desist from Improperly Holding Yourselves Out as the Duly Elected Officers of the Fresno County Republican Party Central Committee

Dear Mr. Halajian, Ms. Benbrook, Mr. Casarez, Mr. Rollins, and Ms. Turgeon:

Be advised that this office represents the Fresno County Republican Party Central Committee (the “Fresno GOP”) in connection with your improper January 7, 2025 attempt to take over the Fresno GOP and your improperly holding yourselves out as the duly elected officers of the Fresno GOP.

This letter is written in contemplation of, and with the goal of avoiding, litigation. The Fresno GOP “Flipped Fresno County Red” during this past election cycle – by sending out over 64,000 mailers and voter guides; canvassing 15,000 homes; greatly increasing Republican registration; placing billboards throughout the County; and

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conducting radio and text message campaigns. The Fresno GOP even earned national recognition for its innovative and successful efforts.

Your attempted coup not only violated the law and the Fresno GOP's governing documents but is extremely detrimental to the Fresno GOP's ability to build upon its great work and fulfill its mission. **The complaints you have raised about the January 7, 2025 6:00 p.m. meeting are without merit.** Moreover, Fresno GOP unity is especially important as the January 20, 2025 Presidential Inauguration and the Spring 2025 State Party Convention approach (see <https://cagop.org/convention/>).

As you know, the Fresno GOP is a duly qualified California nonprofit association pursuant to California Corporations Code section 18020. For nearly 40 years, the Fresno GOP has operated a State political committee (FPPC ID # 741921), the "Republican Party of Fresno County (State)" (formerly known as the "Republican Central Committee of Fresno County" and the "Fresno County Republican Central Committee").

The Fresno GOP also operates a Federal political committee (FEC ID # C00334383), maintains a website (www.fresnogop.org) and is recognized by State law (see California Elections Code section 7400, et seq., the California Republican Party (see <https://cagop.org/counties/fresno/>) and the Republican National Committee as the official Republican Party Central Committee of Fresno County.

The Fresno GOP is governed by its Articles of Association. For at least the following reasons, your challenge to the January 7, 2025 6:00 p.m. meeting, and your attempt to supersede the actions taken at that meeting by purporting to hold a Fresno GOP meeting at 9:15 p.m. that same night, are invalid:

- 1) Pursuant to Article XIII, section C, subsection 1, three inspectors of election ("election inspectors") were appointed at the January 7, 2025 6:00 p.m. meeting.

Pursuant to Article XIII, section C, subsection 2, the election inspectors determined the number of duly elected voting members, the existence of a quorum, and the validity of any Alternates designated by an Ex-Officio member; received votes; counted and tabulated votes; and determined the results of the election.

Pursuant to Article XIII, section C, subsection 3, “the decision, act or certificate of a majority of the inspectors is effective in all respects as the decision, act or certificate of all.” Insofar as the election inspectors determined that Elizabeth Kolstad and her slate prevailed, and that Peter Halajian and his slate lost, such determination is effective.

We also note that there were no objections or challenges to the election inspectors’ calling for the vote or determining the results of the election. Additionally, Mr. Halajian and his slate ratified the election by staying at the meeting and participating in the remaining aspects of the meeting, such as the filling of vacancies and the adoption of the budget. As such, Mr. Halajian and his slate are deemed to have ratified the results of the election and to have further waived any objections as to the meeting and the election;

- 2) Pursuant to Article XIII, section B, the place and time of the January organizational meeting is determined at the regular November meeting of the prior year. That the January 2025 organizational meeting would be held on January 7, 2025 at 6:00 p.m. was determined at the November 2024 meeting, and Mr. Halajian had no legal authority to deviate from that and independently decide and declare that the organizational meeting would be at 9:15 p.m.; and
- 3) Notwithstanding Article XIII, section B, pursuant to Article IV, section B, meetings of the Fresno GOP may be convened “upon the call of the County Chair.” As Mr. Halajian was not the County Chair on January 7, 2025 at 9:03 p.m. (and still isn’t) when he purportedly called for the Fresno GOP meeting to begin a mere 12 minutes later, the email message in which he called for a “reconvened” 9:15 p.m. meeting was ineffectual, null, and void.

Accordingly, by this letter, **demand is hereby made that you immediately cease and desist from engaging in, or directing or encouraging others to engage in, the activities described below, as follows:**

- 1) **Cease and Desist** from holding yourselves out as having been duly elected as officers of the Fresno GOP on January 7, 2025;

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- 2) **Cease and Desist** from using the tradenames “Fresno GOP,” “Republican Party of Fresno County,” “Fresno County Republican Party,” “Fresno County Republican Central Committee,” or other similar or derivative names;
- 3) **Cease and Desist** from engaging in any contact with the California Republican Party and/or the Republican National Committee in which you hold yourselves out as duly elected officers of the Fresno GOP;
- 4) **Cease and Desist** from calling for, or holding, purported meetings of the Fresno GOP, including the one you have announced for Monday, January 27, 2025 at 6:00 p.m.;
- 5) **Cease and Desist** from contacting any person or entity regarding monetary or non-monetary contributions, loans, or other financial support, or accepting such support, for the Fresno GOP;
- 6) **Cease and Desist** from entering into any contracts, signing any agreements, entering into any business relationships, spending any funds, or incurring any legal or financial obligations in the name of the Fresno County GOP; and
- 7) **Cease and Desist** claiming that the January 7, 2025 6:00 p.m. meeting of the Fresno GOP, and specifically the election of officers at that meeting, was invalid.

Additionally, **demand is hereby made that you:**

- 1) **Publicly renounce** the results of the purported “election” undertaken at your January 7, 2025 9:15 p.m. “meeting” held at Denny’s Restaurant at 1151 West Herndon, Clovis, CA 93612 (the “Denny’s meeting”);
- 2) **Publicly announce** your acceptance of the results of the election undertaken by the Fresno GOP at the January 7, 2025 6:00 p.m. meeting held at 1225 East Shaw Avenue, Fresno, CA 93710;
- 3) **Publicly apologize** for attending the Denny’s meeting, purporting to conduct an election at that meeting, and improperly holding yourselves out as duly elected officers of the Fresno GOP; and

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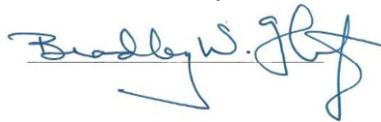
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- 4) **Publicly cancel** the January 27, 2025 “meeting” that you have announced, and publicly acknowledge that the next Fresno GOP Central Committee meeting is on January 30, 2025 at 6:00 p.m. at the Redeemer Lutheran Church at 1084 West Bullard Avenue, Fresno, CA 93711.

We look forward to your full compliance with the eleven items set forth above no later than Noon on January 22, 2025.

Sincerely,

A handwritten signature in blue ink that reads "Bradley W. Hertz". The signature is written in a cursive style and is positioned above a horizontal line.

Bradley W. Hertz