

I. FRAUD UPON THE COURT AND FAILURE OF JUDICIAL AND OFFICER RESPONSIBILITY

On March 22, 2024, nineteen months ago and prior to any other costly further action in state and the federal courts, Movants Susan P. Opraseuth and Sarah E. Thompson filed verified pleadings styled as Motions to Intervene, supported by sworn affidavits of facts ---and evidence. Subsequently, Movants Opraseuth and Thompson filed additional notices in the Supreme Court of Georgia (Jul 2024), United States Court of Appeals for the Eleventh Circuit (Feb 2025), and U.S. District Court for the Northern District of Georgia, Atlanta Division (Jul 2025).¹ (Exh. 6).

Any assertion that Georgia Republican Party, Inc. or its local Catoosa affiliates hold constitutional standing or legal status in these proceedings is **categorically false and deliberately misleading**. Movants presented indisputable evidence of crime and fraud to them. However, our multiple notices caused no epiphany, as they have been fully engaged in its corporate activities for several years. (Exh. 2, 3, 4).

Their filings demonstrated that a private corporation—the *governing and directing Georgia Republican Party, Inc.*, control number 14013271 of the Georgia Corporations Division with its principal office listed in P.O. Box 550008, Atlanta, GA 30355, USA and its county corporate affiliates—are unlawfully substituting themselves for lawful political party committees under O.C.G.A. Title 21, Chapter 2, Article 3, thereby falsifying legal status

¹ *Long, et al v. Catoosa County Republican Party, et al.*, SUCV20204000211, (Sup. Ct. of Catoosa Cty). (motion to intervene to expose corporate control of ballot access filed Mar 2024). *Catoosa Cnty. Republican Party v. Henry*, 319 Ga. 794, 906 S.E.2d 750 (2024). (amicus brief filed Jul 2024). *Catoosa Cnty. Republican Party v. Catoosa Cnty. Bd. of Elections & Voter Registration*, No. 24-12936, 2025 WL 1662455 (11th Cir.). (amicus brief filed Feb 2025). *Catoosa Cnty. Republican Party v. Catoosa Cnty. Bd. of Elections & Voter Registration*, No. 4:24-cv-00095-WMR (N.D. Ga.). (motion and notice for crime and fraud on the court filed Jul 2025).

in state-administered elections. (Exh. 7, 14). State case law has long affirmed it to be patently unconstitutional for private corporations to conduct state election functions within Georgia jurisdictions. It makes no difference the name of the corporation. Artificial persons have no entitled rights to an elective franchise. As such, they have no statutory authority to grant ballot access or nominate to public office.

Though captioned as motions to intervene, the filings were, in substance, notices of crime and fraud upon the tribunal. As such, no legal standard for intervention applies. **Movants have inherent standing.** The court must sua sponte handle the fraud upon its appearance consistent with Georgia Code of Judicial Conduct, Rule 2.15(A), Georgia Rule of Professional Conduct 3.3(a), and ABA Model Rule 1.2, 8.3, and 8.4.

Rather than address the verified evidence and correct themselves, **Petitioner Candidates filed oppositions on April 16, 2024 into SUCV 2024000211**, asserting that “the Movant-Intervenors have the ability to pursue their own litigation against Georgia Republican Party, Inc. (who is not a party to this lawsuit).” (pg. 3). This is despite the fact that, as a result of Judge Don W. Thompson’s Order of March 8, 2024, O.C.G.A. § 21-2-153(e)(9), candidates were required to unlawfully sign qualifying affidavits promising their obedience to the undisclosed GRP, Inc. and its corporate “rules.” It also mandated O.C.G.A. § 21-2-131(c)(3)(B) requiring that the Catoosa County Election Superintendent transmit “25 percent” of the qualifying fees of the four Petitioner-candidates to only a lawful state executive committee of registered and compliant political party and NOT the *actually unconstitutionally interfering and noncompliantly receiving* private corporation, Georgia Republican Party, Inc. (Exh. 10, 13). Despite knowing this, the candidates and their attorneys refused to forfeit their corporate power pursuits by responsibly addressing the verified fraud and criminal conduct therein.

Joanna Hildreth is a willing agent of GRP, Inc. Clearly, the artificial person of the private corporation was not “naturalized” to an association of natural persons by simply occupying Catoosa County jurisdiction under the name “party,” led by its agent. (Exhibit 1, 2, 3). Any Corporate “State Committee” blatantly mixes authorities and divergent legal structures. (Exh. 2, 4, 5 and Fig. A below). O.C.G.A. § 14-3-801 requires that all nonprofit corporations be governed by a board of directors. However, O.C.G.A. § 21-2-110 et seq, prescribing the compliant form of a political party association of members, requires that state governing committees be democratically elected through party affairs and conventions. It is not “both” or a “combination.” There is no merger between artificial and natural to uphold Art. 1 of the U.S. Constitution. As such, this rogue corporate interference is highly unconstitutional.

Still, **Respondent Corporate Actors filed an additional opposition on September 30, 2025 into SUCV 2024000211**, asserting legal standards for Intervention that “the Proposed Intervenors ... have no information related to any issue of importance to this case,” despite having been on notice for nineteen months and in direct possession and intimately knowledge of documentary proof that **no lawful political party exists** under Georgia law. (Exh. 7, 14).

By their responses, all parties and counsel—including direct, willing, and conflicted agents of the GRP, Inc. - **Attorneys Catherine Bernard, Alex Johnson, David Oles, and Petitioner Joanna Hildreth**—demonstrate both knowledge of the fraud and willful disregard for the court’s integrity by continuing to appear as agents of a Title 14 corporation falsely captioned as a Title 21 political party. (Exh. 1-7). They have made no attempt to correct the record or even state the authority of the Atlanta private corporation - GRP, Inc. - under which they work to assert *corporate* faux and ruffian associational rights inside of elections. Such acts

constitute fraud upon the court and attorney misconduct under Georgia Rules of Professional Conduct 3.3(a) and 8.3(a) and O.C.G.A. § 16-10-20.

Additionally, once the court is placed on notice of such misconduct, it bears a non-discretionary duty to act. As the Supreme Court held in *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238, 245-46 (1944):

“Tampering with the administration of justice ... involves far more than an injury to a single litigant. It is **a wrong against the institutions set up to protect and safeguard the public.** ... The **public welfare demands** that the agencies of public justice be not so impotent that they must always be mute and helpless victims of deception and fraud.”

Fraud upon the court **concerns the integrity of the tribunal itself**, not a private cause of action, and does not require Article III or statutory standing. Information exposing fraud from outside parties was deemed helpful “*amici curiae*” in federal precedence. *Universal Oil Prods. Co. v. Root Refining Co.*, 328 U.S. 575 (1946). Courts possess inherent authority to vacate any proceeding tainted by fraud, deception, or *ultra vires* conduct and to sanction the responsible parties. *Id.*; *Hazel-Atlas*, 322 U.S. at 245–46; *Chambers v. NASCO, Inc.*, 501 U.S. 32, 44 (1991).

By failing to address the verified March 2024 filing, this Court has left conduct undermining its jurisdiction and Georgia’s election laws as unremedied. When fraud appears on the record, **judicial discretion ends**; the tribunal must act to preserve due process and public confidence. The Georgia Code of Judicial Conduct, Rule 2.15(A), mandates that a judge take appropriate action upon credible evidence that an attorney has committed misconduct involving honesty or trustworthiness.

This Emergency Motion for Relief invokes the Court’s duty to protect the integrity of the judicial process. This verified motion and 25 exhibits, including multiple affidavits, show not mere procedural error but

systemic substitution of a private corporation for the statutory state political party, depriving voters and candidates of rights protected by the First and Fourteenth Amendments and O.C.G.A. §§ 21-2-110, -111, -154. Granting ballot access by statutory authority is undeniably state action consistent with the state action doctrine. The continued recognition of local corporate agents of Georgia Republican Party, Inc. with statutory authority to conduct any state election function proves corporate infiltration of public elections. Again, a Title 14 entity headquartered in Atlanta cannot “naturalize” into a lawful political party within a county or exercise statutory election powers under O.C.G.A. § 1-2-6 or Ga Title 21.

The **Superior Court of Catoosa County’s March 8, 2024 Order** already found that the purported county party rules “bear no attestation or certification required by O.C.G.A. § 21-2-111(c) and are therefore void,” recognizing the absence of lawful party governance in Catoosa. (pg. 3). The document also bears no identification of “Rules of the Georgia Republican Party, Inc.” in its Rules of Order, thereby attempting to operate as a free-standing association conducting state election functions with First Amendment Fervor. (Exh. 18). However, without a lawfully registered Republican State Political Party, as is the case here, there is no entity to “establish and maintain” county political party committees per the plain requirement of state law. Accordingly, this Court must act under its inherent supervisory powers and O.C.G.A. § 9-11-60(d) to investigate and remedy this ongoing fraud. Judicial silence in the face of verified fraud would constitute abdication of the Court’s constitutional duty. It would also be a direct affront to the Laws of Nature and of Nature’s God, human free will itself.

II. URGENCY AND RELIEF REQUESTED

This is an **emergency** request for the Court to:

1. Recognize and remedy fraud upon the court arising from misrepresentation of political-party status and authority;
2. Vacate or strike rulings, filings, or relief premised on such misrepresentations;
3. Compel disclosures and convene a limited evidentiary hearing;
4. Sanction counsel and parties responsible for litigation misconduct;
5. Enjoin continued use of private corporate entities to exercise statutory political-party powers; and
6. Refer the record to appropriate state and federal authorities.

See **O.C.G.A. § 9-11-60(g)** (fraud on the court) and the Court's inherent powers, *Hazel-Atlas*, 322 U.S. at 245–46; *Chambers*, 501 U.S. at 44.

III. STANDING

Movants, with personal knowledge and verifiable evidence, are Georgia voters directly injured by the unconstitutional substitution of Georgia Republican Party, Inc. (GRP, Inc.), a Title 14 corporation, for a lawful Title 21 political party. (Exh. 7, 11, 12, 14). This act of substitution has effected an act of unconstitutional disassociation to the detriment of all Georgia voters. In this case and for many years, Catoosa County voters have also been repeatedly injured, yet nearly completely unaware of the herein false representation and deceptive acts occurring in their jurisdiction by means of the corporate actors and without compliance correction by county officials. Corporate actors control ballot access statewide while no lawful state political party or governing committee is on file as required by O.C.G.A. §§ 21-2-110, -111, -154.

Movants have inherent standing to bring this emergency motion and notice of crime and fraud without requiring Article III or statutory standing. *Universal Oil Prods. Co.*, 328 U.S. at 575. This Court's

next ruling should directly invalidate any actual, attempted, and unconstitutional state election actions of the GRP, Inc. corporate arm interfering in the elective franchise of Catoosa County citizens and impliedly all county jurisdictions. See *Reynolds v. Sims*, 377 U.S. 533 (1964) (The right to vote freely for candidate of one's choice is of the essence of democratic society, and any restrictions on that right strike at the heart of representative government. The right of suffrage is a fundamental matter in a free and democratic society; since the right to exercise franchise in free and unimpaired manner is preservative of other basic civil and political rights any alleged infringement of the right of citizens to vote must be carefully and meticulously scrutinized).

IV. FACTUAL SUMMARY: UNLAWFUL CORPORATE SUBSTITUTION FOR CONSTITUTIONAL POLITICAL PARTY STRUCTURE

A. Corporate Usurpation of Party Authority

In 2014, private actors filed incorporation papers under Georgia Title 14, establishing *Georgia Republican Party, Inc.* (“GRP, Inc.”), a private nonprofit corporation. (Exh. 14). In doing so, they substituted corporate officers and agents for the **democratically constituted state committee** required under Georgia’s Election Code, Title 21. This substitution of a political party’s lawful governing body with a privately controlled corporation is **facially repugnant to Georgia law** and violates foundational constitutional principles. As reaffirmed by the Supreme Court in *Marbury v. Madison*, 5 U.S. (1 Cranch) 137 (1803), courts must say “what the law is” and cannot ratify acts contrary to constitutional structure.

B. No Filed State Committee or Certified Rules Since 2014

The Georgia Secretary of State’s official records confirm that **no validly constituted state committee, state chairman, or certified rules have** been filed under O.C.G.A. § 21-2-111 since the corporate takeover in

2014. (Exh. 7, 15, 22, 23). Consequently, every election conducted under the guise of party endorsement—without a lawful state committee—has **failed to satisfy the statutory ballot access requirements of O.C.G.A. § 21-2-154(a)** “Such certification shall not be accepted if the political party has not registered with the Secretary of State as required in Article 3 of this chapter.”

Additionally, no Republican apparatus complied with **O.C.G.A. § 21-2-110(f)** “A political party, body, or municipal executive committee failing to file a registration statement as required by subsection (a) or (b) of this Code section at least 60 days before any primary or election at which it shall seek to have candidates on the ballot **shall not** have its name or the names of its candidates placed on any nomination petition, ballot, or ballot label.” Evidence shows that Attorney Catherine Bernard met with a corporate group on January 11, 2024 to address the non-existence of a political party filing, which had been corporately acknowledged at a meeting on June 8, 2023 at which Ms. Opraseuth was present. (Exh. 3, 4, 5). This was exactly 60 days prior to Georgia’s Presidential Preference Primary Election of March 12, 2024. (Exh. 4, 23, 24). Therefore, the presidential primary ballots for “Republicans” were constituted fraudulently, in violation of state law and Article II, Section II, Paragraph 1 of the Georgia Constitution. “Elections by the people shall be by secret ballot and shall be conducted in accordance with procedures provided by law.”

C. Corporate Control in Catoosa County Elections

The entity operating under the name “Catoosa County Republican Party” is a local arm of GRP, Inc., functioning under corporate rules promulgated by that private body. (Exh. 18). It conducts public election activity **without any basis in a lawful county committee** and in violation of O.C.G.A. § 21-2-111(a)-(b), which requires that county party committees derive authority from a valid state party governing committee and operate

under certified, published rules. **The recognition of these corporate agents by state or county officials to act in any way - appoint, nominate, grant access, designate - constitutes a direct violation of election laws and their authoritative Ga Constitutional provisions.**

D. Constitutional Nullification of Voter Rights

This unlawful corporate substitution has stripped Georgia voters of their First and Fourteenth Amendment rights to freely associate and organize for the purpose of selecting and nominating candidates. As the U.S. Supreme Court held in *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 460 (1958), “[t]he right to engage in association for the advancement of beliefs and ideas is protected by the First and Fourteenth Amendments.” Political parties are **associations of citizens**, not artificial corporate bodies with self-appointed boards nor local corporate affiliates. GRP, Inc. operates with **no electoral accountability**, thereby denying voters any means of internal democratic participation and violating the fundamental liberty of political self-organization.

E. Violation of Guarantee Clause and State Constitution

By permitting GRP, Inc. to have “party” recognition, ballot access, and candidate endorsement without any democratic mechanism, Georgia officials have **subverted the republican form of government** guaranteed under Article IV, § 4 of the U.S. Constitution and Article I, Section II, Paragraph III of the Georgia Constitution. The Secretary of State acts in direct violation of O.C.G.A. § 21-2-50(a)(2). Still the judiciary cannot continue to act passively at this time. The operation of government through corporate proxies is the very definition of oligarchy, not republican self-rule. As *Marbury* confirms, “the government of the United States has been emphatically termed a government of laws, and not of men”—but here, the law has been supplanted by the private will of a board of directors, undisclosed and with plenary authority.

F. Illegal Corporate Activity Admitted by Counsel

At a January 11, 2024 “subcommittee meeting” conducted by GRP, Inc. operatives and attorneys Catherine Bernard, Alex Johnson, and David Oles, the use of the corporate structure to control state party affairs was openly acknowledged. (Exh. 4). Ms. Opraseuth personally observed these events, and witness Joanna Hildreth was also present. These discussions constitute direct evidence of attorney knowledge and active participation in **an ongoing fraud upon Georgia’s election system and this Court.**

G. Formal Notice of Illegality Suppressed by Corporate Officers

At a January 20, 2024 corporate meeting styled as a “State Committee” meeting, Ms. Opraseuth raised a formal *Point of Order* under Robert’s Rules of Order § 23:6, objecting to ongoing violations of O.C.G.A. § 21-2-111(a), (d), and (f). (Exh. 3). The presiding officer, corporate actor Josh McKoon, who is also an attorney of the State of Georgia, responded by **shutting down the objection and entering secret session**, a tacit admission of legal vulnerability and continued concealment of ultra vires activities.

H. Direct Harm to Electors and Candidates

As a result of the unlawful corporate control over Georgia’s Republican ballot line, the Petitioners and other similarly situated electors have been **deprived of lawful political participation**, equal protection, and access to candidate nomination procedures under state and federal law. These acts violate the fundamental rights asserted in *Minnesota Voters Alliance v. Mansky*, 138 S. Ct. 1876 (2018), reaffirming that political parties are indeed sanctuaries where First Amendment protection must exist, and also that voters are entitled to an election process free of artificial intrusion or interference.

In considering the impact to First Amendment expression, the U.S. Supreme Court absolutely considers there to be a breach of separation

between privation corporations and political parties, implying a prohibition on one masquerading as the other. “The Court's ruling thus dramatically enhances the role of corporations and unions—and the narrow interests they represent—vis-à-vis the role of political parties—and the broad coalitions they represent—in determining who will hold public office.” *Citizens United v. Fed. Election Comm'n*, 558 U.S. 310, 412, 130 S. Ct. 876, 940, 175 L. Ed. 2d 753 (2010).

V. LEGAL STANDARD

Fraud Upon the Court. Judgments obtained by fraud upon the court may be vacated at any time. O.C.G.A. § 9-11-60(g); *Universal Oil Prods.*, supra; *Rozier v. Ford Motor Co.*, 573 F.2d 1332 (5th Cir. 1978); *Bohannon v. State*, 269 Ga. 130 (1998).

Inherent Powers. Courts may sanction misconduct, strike tainted filings, and hold hearings to protect integrity. *Savannah Elec. & Power Co. v. Holton*, 172 Ga. 320 (1931); *State v. Lampl*, 296 Ga. 892 (2015).

VI. ARGUMENT

A. Presenting a Title 14 Corporation as a Title 21 Party Constitutes Fraud

A private Title 14 nonprofit corporation has no lawful authority to exercise public functions reserved for a political party governed under Georgia Election Code Title 21. Artificial Corporate Persons and Political Party Associations of Natural Persons have entirely different legal structures, as can be seen here:

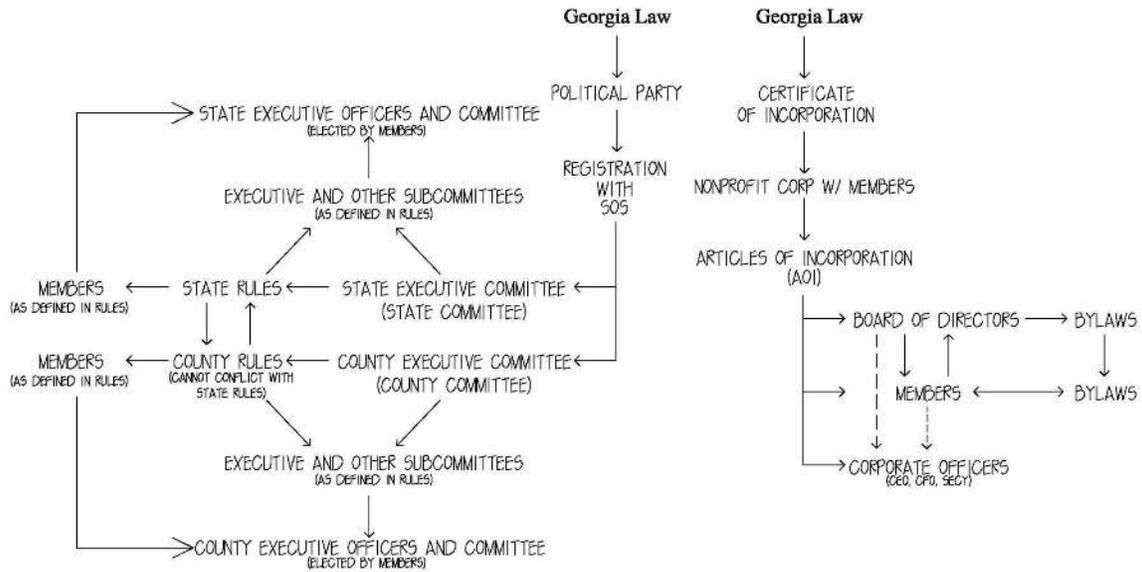


Figure A.

Substituting a private, non-member corporate structure in place of the statutory political party framework by seizing the association name and tax-exempt privileges constitutes **fraud upon the court** and upon the people of Georgia. See *Bush v. Gore*, 531 U.S. 98 (2000) (The state must satisfy minimum requirement for non-arbitrary treatment of voters necessary, under Equal Protection Clause, to secure fundamental right to vote). See also *Travelers Indem. Co. v. Gore*, 761 F.2d 1549, 1551 (11th Cir. 1985), which says:

“Fraud upon the court” should, we believe, embrace only that species of fraud which does or attempts to, defile the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery cannot perform in the usual manner its impartial task of adjudging cases that are presented for adjudication, and relief should be denied in the absence of such conduct.

No lawful order authorizes any county, municipality, or election official to recognize, seat, or implement the dictates of a private corporation—or its analogs—as if they were a statutory political party. Any such act violates

Georgia’s non-delegation doctrine and is **ultra vires**. See *Delay v. Sutton*, 304 Ga. 338, 342–43, 818 S.E.2d 659 (2018); *Rogers v. Med. Ass’n of Ga.*, 244 Ga. 151 (1979). The delegation of public appointment power to private, unelected entities is categorically prohibited.

B. Counsel for Petitioner Parties Acted Outside Lawful Authority

Attorneys purporting to represent the “party” in this action—such as Joanna Hildreth and others—are in fact legal agents of a private corporate affiliate, not a lawful statutory political party. They simultaneously assert the authority of public law while advancing the private interests of GRP, Inc. This is antithetical to the rule of law and violates the duty of candor owed to courts. *In re Snyder*, 472 U.S. 634 (1985).

On September 17, 2024, the Georgia Supreme Court issued an opinion in *Catoosa County Republican Party v. Henry*, 319 Ga. 794, 906 S.E.2d 750 (2024), stating:

Indeed the trial court seems to have had similar questions about the authority of the CCRP when, citing OCGA § 21-2-111 (c), it noted in its March 7, 2024, order that the CCRP ‘rules are not “consistent with the law and the rules and regulations of the state executive committee” of the Georgia Republican Party because the state executive committee rules have no provision regarding pre-approval of candidates for other offices.’

This reflects systemic judicial confusion stemming from misrepresentations by corporate counsel. The court failed to acknowledge the **legal fact** that **no state Republican political party**—in compliance with Title 21—has existed since 2014. The deception continues before this Court and before numerous others. Why didn’t the Justices heed the Amicus Brief of July 1, 2024?

C. The Corporate Actor Has Unconstitutionally Claimed Judicial Standing in Numerous Federal Cases

Not only have attorney agents of GRP, Inc. in this case represented themselves fraudulently, but also its CEOs and General Counsels have done so repeatedly and ongoingly. GRP, Inc. fraudulently represented itself as the statutory Georgia Republican Party in a long and growing series of cases:

CRITICAL CASE: *Qiana Keith v. Georgia Republican Party, Georgia Republican Party, Inc. and John Padgett, in his capacity as Chairman of the Georgia Republican Party and Georgia Republican Party, Inc.*, (Exh. 11). No. 1:14-cv-02159-CAP, WITHHELD FROM THE FEDERAL REPORTER (N.D. Ga. 2014)(this demonstrates the fact of two separate entities during the period of unlawful conversion).

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

QIANA KEITH,)	
)	
Plaintiff,)	CIVIL ACTION FILE NO.
)	
v.)	1:14-cv-02159-CAP
)	
GEORGIA REPUBLICAN PARTY and)	
GEORGIA REPUBLICAN PARTY, INC.;)	
)	
Defendants.)	
)	

**AMENDED JOINT STIPULATION OF VOLUNTARY
DISMISSAL WITH PREJUDICE**

COME NOW the parties to this action, Plaintiff Qiana Keith and Defendants Georgia Republican Party and Georgia Republican Party, Inc., and jointly stipulate, pursuant to FED.R.CIV.PRO. 41(a)(1)(A)(ii), to amend the previously filed dismissal without prejudice to dismiss Plaintiff's claims with prejudice. Each Party shall bear their own cost and attorney fees in connection with this matter.

Figure B.

Coal. for Good Governance v. Kemp, No. 1:21-CV-2070-JPB, 2025 WL 848462 (N.D. Ga. Mar. 18, 2025)

Int'l All. of Theater Stage Emps. Loc. 927 v. Fervier, No. 1:23-CV-04929-JPB, 2025 WL 747513 (N.D. Ga. Mar. 7, 2025)

New Georgia Project v. Raffensperger, No. 1:24-CV-03412-SDG, 2024 WL 5118477 (N.D. Ga. Dec. 16, 2024)

In re Georgia Senate Bill 202, 688 F. Supp. 3d 1300 (N.D. Ga. 2023)

In re Georgia Senate Bill 202, 622 F. Supp. 3d 1312 (N.D. Ga. 2022)

VoteAmerica v. Raffensperger, No. 1:21-CV-01390-JPB, 2022 WL 22869788 (N.D. Ga. Apr. 21, 2022)

Coal. for Good Governance v. Kemp, No. 1:21-CV-02070-JPB, 2021 WL 2826094 (N.D. Ga. July 7, 2021)

Fair Fight Action, Inc. v. Raffensperger, No. 1:18-CV-5391-SCJ, 2021 WL 9553856, at *26 (N.D. Ga. Mar. 31, 2021), opinion clarified, No. 1:18-CV-5391-SCJ, 2021 WL 9553849 (N.D. Ga. Nov. 15, 2021)

United States v. Georgia, 574 F. Supp. 3d 1245 (N.D. Ga. 2021)

In re Georgia Senate Bill 202, No. 1:21-CV-01259-JPB, 2023 WL 5334582 (N.D. Ga. Aug. 18, 2023)

Georgia State Conf. of NAACP v. Raffensperger, No. 1:21-CV-01259-JPB, 2021 WL 12300690 (N.D. Ga. Dec. 9, 2021)

New Georgia Project v. Raffensperger, No. 1:21-CV-01229-JPB, 2021 WL 12300689 (N.D. Ga. Dec. 9, 2021)

Trump v. Kemp, 511 F. Supp. 3d 1325 (N.D. Ga. 2021)

Sixth Dist. of Afr. Methodist Episcopal Church v. Kemp, 574 F. Supp. 3d 1260 (N.D. Ga. 2021)

New Georgia Project v. Raffensperger, 976 F.3d 1278 (11th Cir. 2020)

Georgia Republican Party, Inc. v. Sec'y of State for Georgia, No. 20-14741-RR, 2020 WL 7488181 (11th Cir. Dec. 21, 2020)

Democratic Party of Georgia, Inc. v. Crittenden, 347 F. Supp. 3d 1324 (N.D. Ga. 2018)

Georgia Attorneys Present **Duplicitous Pleadings and Certificates** to State and Federal Judges. (Exh. 16). In each case, attorneys either failed to disclose the GRP, Inc., as in the current case to avoid redress of corporate standing in important election matters involving power or protection, or failed to state that named GRP, Inc. is not and cannot be a lawfully registered political party under Title 21. This pattern of misrepresentation constitutes **systemic fraud upon the judiciary**, both federal and state.

D. Electors' Associational and Ballot Access Rights Are Nullified

Under O.C.G.A. §§ 21-2-153 and 21-2-131, only voter-governed political parties may nominate candidates and receive qualifying fees. GRP, Inc.—a private, closed corporation—has usurped this authority without electoral accountability. This obliterates Georgia voters' associational rights, in violation of:

- a. *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958)
- b. *Tashjian v. Republican Party of Conn.*, 479 U.S. 208 (1986)
- c. *Eu v. San Francisco Cty. Democratic Cent. Comm.*, 489 U.S. 214 (1989)
- d. *Williams v. Rhodes*, 393 U.S. 23 (1968)

By definition, GRP, Inc. is **not** a political party under O.C.G.A. § 21-2-2(23), (24), or (25), nor is it a political organization within the meaning of Georgia election law. It is a legal fiction maintained by opaque, self-perpetuating officers and agents, utterly disconnected from the Georgia electorate.



Figure C.

Thus, its continued assertion of authority over public candidate selection—whether in Catoosa County or anywhere in Georgia—is a **direct constitutional violation** of the right of the people to form and control political associations.

E. Fraudulent Captioning and Corporate Concealment

The Respondent Corporate Actors intentionally omitted their corporate authority from its filings to obscure its private nature and mislead this Court into believing it represents a lawful party. In prior pleadings, GRP, Inc. has used the corporate caption when it suited its interests, confirming **intentional deception**. (Exh. 16).

The absence of public agent listings, members, or filed rules under Ga Title 21, Chapter 2 only deepens the injury. (Exh. 14, 23; See corporate

Articles). GRP, Inc. operates in **systemic secrecy**, in contradiction to Georgia's transparency laws and the democratic requirements of a functioning constitutional republic.

VII. REQUESTED EMERGENCY RELIEF

Movants respectfully request that this Court:

1. **Recognize** fraud upon the court and invoke its inherent authority to remedy it;
2. **Vacate or strike** all orders and filings premised on misrepresentation of GRP, Inc.;
3. **Enjoin** further reliance on GRP, Inc. or its county arms to exercise Title 21 powers until full compliance with **O.C.G.A. §§ 21-2-110, -111, -153(e)(9), -154** is demonstrated;
4. **Compel disclosures** within 10 days of the state governing committee roster, certified rules, and Secretary-of-State acknowledgments;
5. **Hold an evidentiary hearing** on statutory compliance, authority, and candidate effects;
6. **Sanction counsel and parties** responsible for misrepresentation; and
7. **Refer the record** to appropriate state

This 9th day of October, 2025.

Respectfully submitted,



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EXHIBITS

- 1 - Former CEO David Shafer Attempt to Ink-Correct a 2019 Corporate Document
- 2 - Unfiled List of Private Corporate Agents named “State Committee” 2023-2025
- 3 - June 8th, 2023 Draft Minutes and Roll Call of the “State Committee” Meeting
- 4 - Screenshot Evidence from Jan 11th, 12th & 19th, 2024 Attorney Catherine Bernard - Corporate Non Compliance SubCommittee Meeting
- 5- Susan Opraseuth blog post Jan 20th “State Committee” Breach of Law Motion
- 6 - Intervention Brief March 22nd, 2024
- 7 - Affidavits of Fact Opraseuth & Thompson of GA-SOS ORR 24-97
- 8 - Letter to Catoosa County Board of Election and Voter Registration -March 1st, 2024
- 9 - Letter to Catoosa County Board of Election and Voter Registration - March 11th, 2024
- 10 - Memo from GRP, Inc Executive Director Travis Bowden - Qualifying Checks payable to Georgia Republican Party, INC
- 11 - 2018 Case Motion demonstrating Two Entities: Georgia Republican Party and Georgia Republican Party, Inc.
- 12 - GA-SOS Qualifying Week Public Announcement failing to Disclose GRP, Inc to the Public
- 13 - Candidate 2024 GRP, Inc. Qualifying Letter of Fee Payment information with redaction overlay
- 14 - GA-SOS ORR 24-97 Remittance with all Corporate Documents
- 15 - Professional Parliamentary Opinion of Kirby Glad, PRP - April 16, 2023
- 16 - Duplicitous Pleadings Chart
- 17 - Camden County Correspondence showing Conflicting Entities
- 18 - Catoosa Republican Party Rules 2023 - 2025 devoid of Corporate Disclosure
- 19 - Susan Opraseuth Fulton County Affidavit of Corporate Subversion
- 20 - Susan Opraseuth photo evidence of Marketed “election” to Fulton County Chairmanship

21 - Screenshot Evidence of a Corporate indemnity to Former CEO David Shafter in DA Fani Willis Case

22 - GA-SOS ORR 24-137 Lack of Seminal Records of lawful Party Chairmanship Elections

23 - December 14th, 2021 GRP, Inc. General Counsel Vincent Russo admitting GRP, Inc's total usurpation of Statutory Election Functions

24 - Sample Candidate Qualifying Affidavit Form devoid of Corporate Disclosure

25 - Susan Opraseuth & Sarah Thompson Precinct Cards

STATEMENT OF VERIFIABILITY

Pursuant to O.C.G.A. §§ 9-10-113 and 9-11-56(e), I, Susan P. Opraseuth, verify under penalty of perjury that the foregoing Emergency Motion for Relief and Notice of Fraud Upon the Court Based on Systemic Violations of Georgia Voters' First Amendment Associational Rights and all attached exhibits, and that the factual statements contained therein are true and correct to the best of my knowledge, information, and belief.

Executed this 9 day of OCT, 2025.

Sign: *[Handwritten Signature]*

Print: Susan P. Opraseuth
Susan P. Opraseuth, Pro Se
4495 Mariners Ridge
Alpharetta, GA 30005
(513) 284-4321
SusanUSA@protonmail.com

Notary for Susan P. Opraseuth:

Subscribed and sworn before me this 9th day of October, 2025, in the County of Forsyth, State of Georgia.

P. Madher
Notary Public, State of Georgia

My Commission Expires: 04-01-2028



STATEMENT OF VERIFIABILITY

Pursuant to O.C.G.A. §§ 9-10-113 and 9-11-56(e), I, Sarah E. Thompson, verify under penalty of perjury that the foregoing Emergency Motion for Relief and Notice of Fraud Upon the Court Based on Systemic Violations of Georgia Voters' First Amendment Associational Rights and all attached exhibits, and that the factual statements contained therein are true and correct to the best of my knowledge, information, and belief.

Executed this 9 day of OCT, 2025.

Sign: *Sarah E. Thompson*

Print: Sarah E. Thompson
Sarah E. Thompson, Pro Se
150 Timber Cove
Statesboro, GA 30461
(856) 866-6881
freedomwinsusa@protonmail.com

Notary for Sarah E. Thompson:

Subscribed and sworn before me this 9 day of OCT, 2025, in the County of Bulloch, State of Georgia.

Notary Public, State of Georgia *Quinten Texidor*

My Commission Expires: 05/23/2028



PROPOSED ORDER

Upon consideration of the Emergency Motion for Relief and Notice of Fraud Upon the Court Based on Systemic Violations of Georgia Voters' First Amendment Associational Rights, and for good cause shown, IT IS HEREBY ORDERED:

1. The Motion is **GRANTED IN PART** as set forth herein.
2. Within 10 days, Respondents shall produce:
 - (a) the currently filed **state governing committee** roster per **O.C.G.A. § 21-2-111**;
 - (b) the **certified rules** adopted under **Chapter 2**; and
 - (c) any **Secretary of State** acknowledgments evidencing **Title 21** compliance.
3. The Court **SETS** an evidentiary hearing on _____, 2025, at :
____.m., limited to compliance with **Title 21** and authority asserted in this litigation.
4. Pending hearing, the Court **ENJOINS** further reliance on **GRP, Inc.** or its county arm as a lawful **Title 21** party for purposes of obtaining judicial relief in this action.
5. The Court **RESERVES** on sanctions, fees, and further relief pending the hearing.

SO ORDERED this ____ day of _____, 2025.

Judge, Superior Court of Catoosa County

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Emergency Motion for Relief and Notice of Fraud Upon the Court Based on Systemic Violations of Georgia Voters' First Amendment Associational Rights upon all parties and counsel of record by filing it for electronic delivery via PeachCourt.Com, by emailing it to their emails of record in the case, and depositing same in the United States Mail with sufficient postage affixed thereon to ensure delivery, addressed as follows:

<p>Alan C. Norton One Union Square, Ste 700 100 W. Martin Luther King Blvd. Chattanooga, TN 37401-0151 acn@lutherhanderson.com</p> <p>Archibald A. Farrar, Jr. Farrar & Corbin, P.C. P.O.Box 736 Summerville, GA 30747-0736 farrarcorbin@windstream.net</p> <p>Bryan P. Tyson Clark Hill PLC 3630 Peachtree Road N.E., Suite 550 Atlanta, GA 30326 (678) 370-4377 btyson@clarkhill.com</p> <p>Larry Stagg Stagg Law Firm 215 Tennessee St. Ringgold, GA 30736</p>	<p>Bernard & Johnson, LLC Attn: Jordan "Alex" Johnson and Catherine Bernard Five Dunwoody Park, Suite 100 Atlanta, Georgia 30338 404-477-4755 Alex@Justice.Law Catherine@Justice.Law</p> <p>Oles Law Group 5755 North Point Pkwy, Ste 25 Alpharetta, GA 30022 770.753.9995 firm@deoleslaw.com</p> <p>Also: Christopher M. Harris C. Chad Young 7731 Nashville Street Ringgold, Georgia 30736 (706) 935-9100 chrisharris@pattylaw.com chadyoung@pattylaw.com</p>
---	---

This 9th day of October, 2025.

Respectfully submitted,



Sarah E. Thompson, Pro se
150 Timber Cove
Statesboro, GA 30461
(856) 866-6881
freedomwinsusa@protonmail.com



Susan P. Opraseuth, Pro se
4495 Mariners Ridge
Alpharetta, GA 30005
(513) 284-4321
SusanUSA@protonmail.com

EXHIBITS

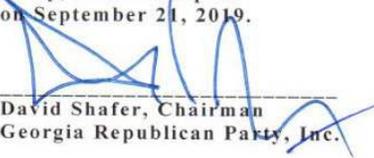
TOTAL: 25

TOTAL PAGES: 124 (incl. this cover)

Source: *Rules of the Georgia Republican Party, Inc. signed by David Shafer.*

**RULES OF THE
GEORGIA
REPUBLICAN PARTY,
INC**

I hereby certify that the
attached is a true and
correct copy of the Rules
of the Georgia Republican
Party, Inc. as adopted
on September 21, 2019.



David Shafer, Chairman
Georgia Republican Party, Inc.

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RULES OF THE GEORGIA REPUBLICAN PARTY

1. MEMBERSHIP AND PARTICIPATION

1.1 QUALIFICATIONS FOR PARTICIPATION IN PARTY ACTIONS

All electors¹ who are in accord with the principles of the Republican Party, believe in its declaration of policy and are in agreement with its aims and purposes may participate as members of the Georgia Republican Party, Inc. (hereinafter "GRP") in its conventions or precinct caucuses. All chairmen² and members of committees, delegates to conventions and voters in precinct caucuses, provided for in these Rules, shall be members of the GRP and must be electors of the respective units which they represent as chairmen, members, delegates, or voters in precinct caucuses.

1.2 PUBLICATION OF QUALIFICATIONS

The qualifications and conditions for participation in the GRP shall be published in all official calls for precinct caucuses and conventions called pursuant to these Rules and pursuant to the Rules and Call of the Republican National Convention.

¹ As defined by O.C.G.A. § 21-2-2(7).
² The terms, "Chairman" and "Vice-Chairman", and all other such terms used in these rules, except the terms "National Committeeman" and "National Committeewoman", shall be gender neutral so that a person of either gender may hold such office.

POSITION	CONGRESSIONAL DISTRICT	FIRST NAME	LAST NAME	COUNTY	Email
EC/SC/Vote	State Chairman/CEO	Josh	McKoon	Fulton	josh@gagop.org
EC/SC/Vote	State 1st Vice Chmn	Brian	Pritchard	Fannin	bkp@bkppolitics.com
EC/SC/Vote	State 2nd Vice Chmn	David	Cross	Gwinnett	dcross108@protonmail.com
EC/SC/Vote	Asst Treasurer	Jenny	Eckman	Harris	jenny@tdmechanical.com
EC/SC/Vote	Treasurer	Laurie	McClain	Gwinnett	laurie@mcclainandcompany.com
EC/SC/Vote	Secretary	Caroline	Jeffords	Fulton	secretary@gagop.org
EC/SC/Vote	Asst Secretary	Susan	Voyles	Fulton	susanvoyles@gmail.com
EC/SC/Vote	Over 80,000 Chairman	Salleigh	Grubbs	Cobb	salgrubbs@gmail.com
EC/SC/Vote	Under 80,000 Chairman	Kathy	Hurley	Oconee	oconeeGOPchair@gmail.com
EC/SC/Vote	Finance Chairman	Vikki	Consiglio	Henry	billandvikkiconsiglio@gmail.com
EC/SC/Vote	National Committeewoman	Ginger	Howard	Fulton	gingerhoward41@gmail.com
EC/SC/Vote	National Committeeman	Jason	Thompson	Gwinnett	thompsonlawfirm@hotmail.com
EC/SC/Vote	Former State Chairman	David	Shafer	Gwinnett	djschafer@gmail.com
EC/SC/Vote	Chairman CD 1	Kandiss	Taylor	Appling	kandisstaylor@gmail.com
EC/SC/Vote	Chairman CD 2	Tyler	Johnson	Lee	opec222@gmail.com
EC/SC/Vote	Chairman CD 3	Mike	Crane	Heard	harvestmrc@gmail.com
EC/SC/Vote	Chairman CD 4	Jim	Duffie	DeKalb	jim@jimduffie.com
EC/SC/Vote	Chairman CD 5	Brad	Carver	Fulton	bcarver@hallboothsmith.com
EC/SC/Vote	Chairman CD 6	Donna	Watson	Cobb	dmhwatson2014@gmail.com
EC/SC/Vote	Chairman CD 7	Louis	Tseng	Gwinnett	louistseng93@gmail.com
EC/SC/Vote	Chairman CD 8	Jonathan "Chan"	Jones	Bleckley	chandlerjones32@gmail.com
EC/SC/Vote	Chairman CD 9	Carl	Blackburn	Habersham	wblackburn1776@gmail.com
EC/SC/Vote	Chairman CD 10	James	Cooper	Walton	jamescooper.gop@gmail.com
EC/SC/Vote	Chairman CD 11	David	Oles	Pickens	oles.david@outlook.com
EC/SC/Vote	Chairman CD 12	Mike	Wiltse	Columbia	chair@12gagop.org
EC/SC/Vote	Chairman CD 13	Bob	Hinton	Henry	chair@ga13th.com
EC/SC/Vote	Chairman CD 14	Denise	Burns	Catoosa	adeniseburns@gmail.com
EC/SC/Appointee/No Vote	State Exec Director	Travis	Bowden	Fulton	travisbowdenrealty@gmail.com
EC/SC/Appointee/No Vote	Parliamentarian, Appeals Chair	John	White	Fulton	jbwjr5234@gmail.com
EC/SC/Appointee/No Vote	General Counsel	Alex	Kaufman	Fulton	akaufman@chalmersadams.com
EC/SC/Appointee/No Vote	Election Board Member (Elected Jan 2	Janice	Johnston	Fulton	janicejmd@gmail.com
EC/SC/Appointee/No Vote	Chmn, GA Republican Foundation	Harrison	Lance		info@gagop.org
SC/Vote	CD 1 At-Large	Debbe	Arwood	Charlton	
SC/Vote	CD 1 At-Large	Danny	Bartlett	Ware	
SC/Vote	CD 1 At-Large	Brittany	Brown	Chatham	
SC/Vote	CD 1 At-Large	Dean	Burnett	Chatham	
SC/Vote	CD 1 At-Large	Nancy	Floyd	Effingham	
SC/Vote	CD 1 At-Large	Debra	Giddens	Ware	
SC/Vote	CD 1 At-Large	Kay	Godwin	Pierce	
SC/Vote	CD 1 At-Large	Alan	Gravitt	McIntosh	
SC/Vote	CD 1 At-Large	Karen	Hewitt	Bryan	
SC/Vote	CD 1 At-Large	Cathy	Powers	Glynn	
SC/Vote	CD 1 At-Large	Noah	Ring	Camden	
SC/Vote	CD 2 At-Large	Kristy	Blankenship	Webster	
SC/Vote	CD 2 At-Large	Sam	Carnline	Grady	
SC/Vote	CD 2 At-Large	Brad	Emerton	Bibb	
SC/Vote	CD 2 At-Large	Marlis	Fewell	Decatur	
SC/Vote	CD 2 At-Large	Brad	Hughes	Early	
SC/Vote	CD 2 At-Large	Gilbert	Jolly	Grady	
SC/Vote	CD 2 At-Large	Piper	Lowe	Dougherty	
SC/Vote	CD 2 At-Large	Nancy	Rinn	Muscogee	
SC/Vote	CD 2 At-Large	Cindy	Summerlin	Baker	
SC/Vote	CD 3 At-Large	Traci	Amiri	Troup	
SC/Vote	CD 3 At-Large	Jim	Bennett	Carroll	
SC/Vote	CD 3 At-Large	Nina	Blackwelder	Coweta	
SC/Vote	CD 3 At-Large	Dan	Brue	Upson	

EXHIBIT 2-2

SC/Vote	CD 3 At-Large	Nancy	Burton	Heard
SC/Vote	CD 3 At-Large	Michelle	Cobb	Spalding
SC/Vote	CD 3 At-Large	Jim	Fernander	Douglas
SC/Vote	CD 3 At-Large	Katie	Frost	Coweta
SC/Vote	CD 3 At-Large	Leonard	Gomez	Coweta
SC/Vote	CD 3 At-Large	Mike	McPherson	Carroll
SC/Vote	CD 3 At-Large	Denise	Ognio	Fayette
SC/Vote	CD 3 At-Large	Dan	Page	Pike
SC/Vote	CD 3 At-Large	Alton	Russell	Muscogee
SC/Vote	CD 3 At-Large	Lyndon	Smith	Haralson
SC/Vote	CD 3 At-Large	Monica	Walters	Lamar
SC/Vote	CD 4 At-Large	Catherine	Bernard	Dekalb
SC/Vote	CD 4 At-Large	Hiram	Dryer	Rockdale
SC/Vote	CD 4 At-Large	Jordan	Johnson	Dekalb
SC/Vote	CD 4 At-Large	Lisa	Kinnemore	Dekalb
SC/Vote	CD 4 At-Large	Lauren	Labit	Newton
SC/Vote	CD 5 At-Large	Travis	Bowden	Fulton
SC/Vote	CD 5 At-Large	Brad	Carver	Fulton
SC/Vote	CD 5 At-Large	Lynda	Chapman	Fulton
SC/Vote	CD 5 At-Large	Caroline	Jeffords	Fulton
SC/Vote	CD 5 At-Large	Frank	Strickland	Fulton
SC/Vote	CD 6 At-Large	Mike	Berg	Dawson
SC/Vote	CD 6 At-Large	Honey	Burfield	Cherokee
SC/Vote	CD 6 At-Large	Sue	Everhart	Cobb
SC/Vote	CD 6 At-Large	Scott	Jackson	Forsyth
SC/Vote	CD 6 At-Large	Norman	Johnson	Forsyth
SC/Vote	CD 6 At-Large	Brian	Laurens	Cherokee
SC/Vote	CD 6 At-Large	Al	Meyer	Cobb
SC/Vote	CD 6 At-Large	John	Nance	Fulton
SC/Vote	CD 6 At-Large	Joel	Natt	Forsyth
SC/Vote	CD 6 At-Large	Susan	Opraseuth	Fulton
SC/Vote	CD 6 At-Large	Pam	Reardon	Cobb
SC/Vote	CD 6 At-Large	Peter	Thelen	Forsyth
SC/Vote	CD 6 At-Large	Lori	Wexler	Forsyth
SC/Vote	CD 6 At-Large	David	Witham	Gwinnett
SC/Vote	CD 7 At-Large	Warren	Auld	Gwinnett
SC/Vote	CD 7 At-Large	Judy	Bailey	Gwinnett
SC/Vote	CD 7 At-Large	Peter	Korman	Fulton
SC/Vote	CD 7 At-Large	Alice	O'Lenick	Gwinnett
SC/Vote	CD 7 At-Large	Jim	Squire	Fulton
SC/Vote	CD 7 At-Large	Kathy	Statham	Gwinnett
SC/Vote	CD 7 At-Large	Jacqueline	Tseng	Gwinnett
SC/Vote	CD 7 At-Large	Kaaryn	Walker	Fulton
SC/Vote	CD 8 At-Large	Angie	Allen	Houston
SC/Vote	CD 8 At-Large	Vivian	Childs	Houston
SC/Vote	CD 8 At-Large	Lott	Dill	Irwin
SC/Vote	CD 8 At-Large	Austin	Futch	Ben Hill
SC/Vote	CD 8 At-Large	Joannah	Hollis	Baldwin
SC/Vote	CD 8 At-Large	Elaine	Hollis	Houston
SC/Vote	CD 8 At-Large	Glynn	Maddox	Dodge
SC/Vote	CD 8 At-Large	Chris	Papierz	Coffee
SC/Vote	CD 8 At-Large	Donna	Sant	Houston
SC/Vote	CD 8 At-Large	Keith	Stone	Berrien
SC/Vote	CD 8 At-Large	Sondra	Supp	Lowndes
SC/Vote	CD 8 At-Large	Janice	Westmoreland	Baldwin
SC/Vote	CD 9 At-Large	Stephen	Aaron	Gilmer
SC/Vote	CD 9 At-Large	Francis	Blackburn	Habersham

SC/Vote	CD 9 At-Large	Tom	Ellis	Gwinnett
SC/Vote	CD 9 At-Large	Ed	Henderson	Rabun
SC/Vote	CD 9 At-Large	Ron	Hooper	
SC/Vote	CD 9 At-Large	Gary	Longueuil	Hall
SC/Vote	CD 9 At-Large	Richie	Stone, Jr.	Gilmer
SC/Vote	CD 9 At-Large	Julianne	Thompson	Gwinnett
SC/Vote	CD 9 At-Large	Andrew	Turnage	Union
SC/Vote	CD 9 At-Large	Dwayne	Turner	
SC/Vote	CD 9 At-Large	Theresa	Webb	Hall
SC/Vote	CD 9 At-Large	Cooper	Whitmire	Hall
SC/Vote	CD 9 At-Large	Rebecca	Yardley	White
SC/Vote	CD 9 At-Large	Kris	Yardley	White
SC/Vote	CD 9 At-Large	Betsy (Muriel)	Young	Towns
SC/Vote	CD 10 At-Large	Bruce	Azevedo	Madison
SC/Vote	CD 10 At-Large	Thomas	Dorminy	Henry
SC/Vote	CD 10 At-Large	John	Elliott	Clarke
SC/Vote	CD 10 At-Large	Ross	Harvin	Jackson
SC/Vote	CD 10 At-Large	Judy	Hollandsworth	Walton
SC/Vote	CD 10 At-Large	Jeffrey	Hughes	Jackson
SC/Vote	CD 10 At-Large	Shami	Jones	Oconee
SC/Vote	CD 10 At-Large	Clay	Kelley	Barrow
SC/Vote	CD 10 At-Large	John	Marsh	Clarke
SC/Vote	CD 10 At-Large	Wendell	McNeal	Morgan
SC/Vote	CD 10 At-Large	Mark	Schulz	Greene
SC/Vote	CD 10 At-Large	Cathy	Ware	Oglethorpe
SC/Vote	CD 10 At-Large	Tracy-Conkel	Wheeler	Hancock
SC/Vote	CD 11 At-Large	Alicia	Adams	Cobb
SC/Vote	CD 11 At-Large	Anabella	Branco	Cherokee
SC/Vote	CD 11 At-Large	Carolyn	Childers	Pickens
SC/Vote	CD 11 At-Large	Melanie	Collier	Bartow
SC/Vote	CD 11 At-Large	Marcia	Cox	Cherokee
SC/Vote	CD 11 At-Large	Sandy	Docherty	Cherokee
SC/Vote	CD 11 At-Large	Dr. Fun	Fong	Cobb
SC/Vote	CD 11 At-Large	Susann	Haddad	Cherokee
SC/Vote	CD 11 At-Large	Brent	Herrin	Cherokee
SC/Vote	CD 11 At-Large	John	Hightower	Cobb
SC/Vote	CD 11 At-Large	Chad	Teague	Cobb
SC/Vote	CD 11 At-Large	Michael	Williams	Cobb
SC/Vote	CD 11 At-Large	Dee Anne	Wyse	Bartow
SC/Vote	CD 12 At-Large	Sherry	Barnes	Richmond
SC/Vote	CD 12 At-Large	Linda	Clarkson	Evans
SC/Vote	CD 12 At-Large	Jeffrey	Cowart	McDuffie
SC/Vote	CD 12 At-Large	Brittany	Dasher	Effingham
SC/Vote	CD 12 At-Large	Debbie	McCord	Columbia
SC/Vote	CD 12 At-Large	Cassandra	Mikell	Bulloch
SC/Vote	CD 12 At-Large	Ryan	Purvis	Bulloch
SC/Vote	CD 12 At-Large	Lawton	Sack	Bulloch
SC/Vote	CD 12 At-Large	Abigail	Safford	Laurens
SC/Vote	CD 12 At-Large	William	Vaught	Laurens
SC/Vote	CD 12 At-Large	Susie	Welsh	Columbia
SC/Vote	CD 13 At-Large	Matthew	Hardwick	Cobb
SC/Vote	CD 13 At-Large	Joyce	Hinton	Henry
SC/Vote	CD 13 At-Large	Camilla	Moore	Fulton
SC/Vote	CD 13 At-Large	Cindy	Morley	Douglas
SC/Vote	CD 14 At-Large	Nathaniel	Darnell	Cobb
SC/Vote	CD 14 At-Large	Dawn	Forrest	Paulding
SC/Vote	CD 14 At-Large	Linda	Fowler	Murray

SC/Vote	CD 14 At-Large	Jacqueline	Harling	Walker
SC/Vote	CD 14 At-Large	Joanna	Hildreth	Catoosa
SC/Vote	CD 14 At-Large	Justin	Kelley	Floyd
SC/Vote	CD 14 At-Large	Randy	Pittman	Walker
SC/Vote	CD 14 At-Large	Dianne	Putnam	Whitfield
SC/Vote	CD 14 At-Large	Teresa	Ray	Chattooga
SC/Vote	CD 14 At-Large	Larry	Reynolds	Polk
SC/Vote	CD 14 At-Large	Kathleen	Thorman	Gordon
SC/Vote	CD 14 At-Large	Scott	Tidwell	Gordon
SC/Vote	CD 14 At-Large	Jim	Tully	Paulding
SC/Vote	CD 14 At-Large	Christa	Ware	Dade
EC/SC/No Vote	Black Republican Council	Lisa	Babbage	
EC/SC/No Vote	Republican Jewish Coalition	Chuck	Berk	
EC/SC/No Vote	RNC Senior Network (Chairman)	Linton	Broome	
EC/SC/No Vote	Speaker of the House	Jon	Burns	
EC/SC/No Vote	Attorney General	Chris	Carr	
EC/SC/No Vote	US Congressman - CD 1	Buddy	Carter	
EC/SC/No Vote	US Congressman - CD 9	Andrew	Clyde	
EC/SC/No Vote	US Congressman - CD 10	Mike	Collins	
EC/SC/No Vote	PSC District 2	Tim	Echols	
EC/SC/No Vote	US Congressman - CD 3	Drew	Ferguson	
EC/SC/No Vote	Senate Majority Leader	Steve	Gooch	
EC/SC/No Vote	Agriculture Commissioner	Tyler	Harper	
EC/SC/No Vote	Asian American Outreach	Jimmy	Ho	
EC/SC/No Vote	PSC District 3	Fitz	Johnson	
EC/SC/No Vote	Election Board Member (Elected Jan 2	Janice	Johnston	
EC/SC/No Vote	Lt. Governor	Burt	Jones	
EC/SC/No Vote	Speaker Pro Tem of the House	Jan	Jones	
EC/SC/No Vote	Governor	Brian	Kemp	
EC/SC/No Vote	President Pro Tem of the Senate	John	Kennedy	
EC/SC/No Vote	Insurance Commissioner	John	King	
EC/SC/No Vote	eration of Republican Women - New Pr	Pamela	Lightsey	
EC/SC/No Vote	US Congressman - CD 11	Barry	Loudermilk	
EC/SC/No Vote	Tea Party Liaison	Jenny Beth	Martin	
EC/SC/No Vote	US Congressman - CD 6	Rich	McCormick	
EC/SC/No Vote	PSC District 4	Bubba	McDonald	
EC/SC/No Vote	Teenage Republican Chair	Jack	Miller	
EC/SC/No Vote	Board of Governors/Foundation Chair	Daryl	Moody	
EC/SC/No Vote	Faith Based Outreach	David	Nicholas	
EC/SC/No Vote	PSC District 5	Tricia	Pridemore	
EC/SC/No Vote	Secretary of State	Brad	Raffensperger	
EC/SC/No Vote	US Congressman - CD 8	Austin	Scott	
EC/SC/No Vote	PSC District 1	Jason	Shaw	
EC/SC/No Vote	US Congresswoman - CD 14	Marjorie	Taylor Greene	
EC/SC/No Vote	Labor Commissioner	Bruce	Thompson	
EC/SC/No Vote	House Majority Leader	Bruce	Williamson	
EC/SC/No Vote	State School Superintendent	Richard	Woods	

Georgia Republican Party
State Committee
Meeting Minutes

Thursday, June 8, 2023
Columbus Convention Center
Columbus, GA

I. **Call to Order**

- a. Chairman David Shafer called the meeting to order at 4:04 PM

II. **Invocation and Pledge**

- a. Pledge led by Camilla Moore
- b. Vivian Childs gave the invocation.

III. **Appointment of Proxy Committee**

- a. Secretary Mike Welsh & Assistant Secretary Ken Carroll

IV. **Roll Call**

- a. Chairman Shafer requested Unanimous consent to accept sign in sheet in lieu of calling the roll. Granted. 124 Members represented, 106 in person, 18 via proxy.
- b. . See **Appendix A.**

V. **Treasurer's Report**

- a. Treasurer Joseph Brannan reported. See **Appendix B.**

VI. **Chairman's Report**

- a. Chairman Shafer thanked Treasurer Joseph Brannan for his service. He then outlined the timeline of the convention. Party is larger and stronger than ever before.

VII. **Executive Session**

- a. 1st Vice Chair Brant Frost moved to enter executive session, 2nd Alicia Adams. Motion carries.
- b. Unanimous consent to allow non-State Committee Chairman candidates to remain. Granted.
- c. Scot Jackson Moves to close executive session. 2nd David Oles. Motion carries.

VIII. **New Business**

- a. Susan Oraseulth moves to be Resolved, that the next State Chairman shall appoint within seven days of the State Convention a committee to develop a plan for clarifying

the relationship between the Georgia Republican Party and Georgia Republican Party, Inc. (the Corporation), to include restatement of articles of incorporation of the Corporation in conformity with the Georgia Election Code, with such plan to be approved by the State Executive Committee and implemented no later than ten days after the resolution of all litigation involving of the Corporation. 2nd Camilla Moore. Amended by unanimous consent to change to 10 and 30 days, respectively. David Oles moves to amend to require Susan Oraseulth and Catherine Bernard are on committee. 2nd Nathaniel Darnell. Discussion ensues. Voice vote is held. In the opinion of the Chair, the nays have it. A challenge is made and standing vote is taken. Amendment fails. Resolution passes.

- b. Camilla Moore moves to require the incoming State Chairman to appoint a committee within 10 days of taking office to develop a plan to align elected officials and the Party on legislative initiatives. Numerous 2nd. Nathaniel Darnell moves to amend that Alex Johnson is appointed to the committee. 2nd by Rebecca Yardley. Voice vote is nay in opinion of chair. Standing vote is called. Amendment fails. Motion carries.
- c. John Marsh moves to hold the convention cycle with the following dates, 2nd by Alice O'Linick.
 - i. Precinct caucus on February 24, 2023.
 - ii. County Convention on March 23, 2023
 - iii. District Convention on April 20, 2023
 - iv. Motion carries.

IX. Approval for the temporary role of Convention delegates and alternates as per rule

5.3 (A)

- a. Brad Carver moves to approve the temporary role of convention delegates and alternates 2nd by Brant Frost. Motions carries.

X. Adjournment

- a. Adjournment at 6:22 PM



Michael Welsh

Secretary

Dawn	Forrest		Y	1								
Linda	Fowler		Y									
Bran t	Frost	2nd Vice Chairman	Y	1	Brue	P ag e	Eve rhar t	A mi ri				
Katie	Frost		Y		Cobb							
Austi n	Futch		Y	1								
Debr a	Gidden s		Y									
Kay	Godwi n		Y									
Leon ard	Gomez		Y	1								
Alan	Gravitt		Y									
Susa nn	Hadda d		Y									
Matt hew	Hardwi ck		Y									
Jacq uelin e	Harling		Y									
Ross	Harvin		Y	1								
Ed	Hende rson		Y	1								
Bren t	Herrin		Y	1								
Kare n	Hewitt		Y									
John	Hightow er		Y									
Joan na	Hildret h		Y	1	Harli ng							
Bob	Hinton	13th District Chairman	Y	1	Morl ey							
Joyc e	Hinton		Y									
Judy	Hollan dswort h		Y	1								
Elain e	Hollis		Y	1								

Jason	Thompson	National Committeeman	Y	1								
Julianne	Thompson		Y									
Kathleen	Thorman		Y		Ware							
Scott	Tidwell		Y	1								
Louis	Tseng	7th District Chairman	Y	1								
Jacqueline	Tseng		Y	1								
Jim	Tully		Y									
Andrew	Turnage		Y	1								
Dwayne	Turner		Y									
BJ	Van Gundy	1st Vice Chairman	Y	1								
William	Vaught		Y	1								
Kaaryn	Walker		Y									
Monica	Walters		Y									
Cathy	Ware		Y									
Christa	Ware		Y									
John	Watson	Immediate Past Chairman	Y									
Donna	Watson	6th District Chairman	Y									
Theresa	Webb		Y	1								
Michael	Welsh	Secretary	Y	1								
Susie	Welsh		Y	1								
Janice	Westmoreland		Y	1								

New Message

Cancel

To: Catherine Bernard



Jan 11, 2024 at 7:21PM

Structure subcommittee meeting now. If you know what docs we would need to file under Title 21 definitely let me know!

Start with:

Party must be ruled and operated apart from the corporation.



Text Message • RCS



New Message

Cancel

To: Catherine Bernard

Hi Catherine- will you please provide solutions and who attended the meeting. Appreciate

Jan 19, 2024 at 8:26 AM

John White Alex Kaufman
Robert Barker Bob Hinton •
Bruce Azevedo Carl
Blackburn
Catherine Bernard
David Shafer
Denise Ognio
Frank Strickland
Jim Fernander Justin Kelley
Laurie McClain
Ron Daniels
Ryan Purvis

Also there is a "Jamie" in one of the Signal chats attacking Alex for representing you at



Text Message • RCS



New Message

Cancel

To: Catherine Bernard

Pretty good meeting tonight. There is energy to get everything straightened out.

Thanks. What's next?

Whatever we are needs to match the original entity FEIN (member association).

Jan 12, 2024 at 1:47 PM

Hi Susan, apologies for not being able to take your call this morning, we have hearings in Fulton County on the RICO case so I am at the courthouse.

Apparently there is no new EIN

Jan 14, 2024 at 8:23 PM



Text Message • RCS



New Message

Cancel

To: Catherine Bernard

Jan 20, 2024 at 9:53 AM

Lawsuit is in Appeal now. It is only with the INC.

Therefore separate and let the corporation finish lawsuit while Party gets active doing its business.

Keep enough money - and extra- in corporate account for lawsuit. If for some reason it costs more the Party would write a check to settle at a later date.

I don't think accounts were ever separated? No new EIN we were told



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C

Image · 2.8 MB



Text Message · RCS



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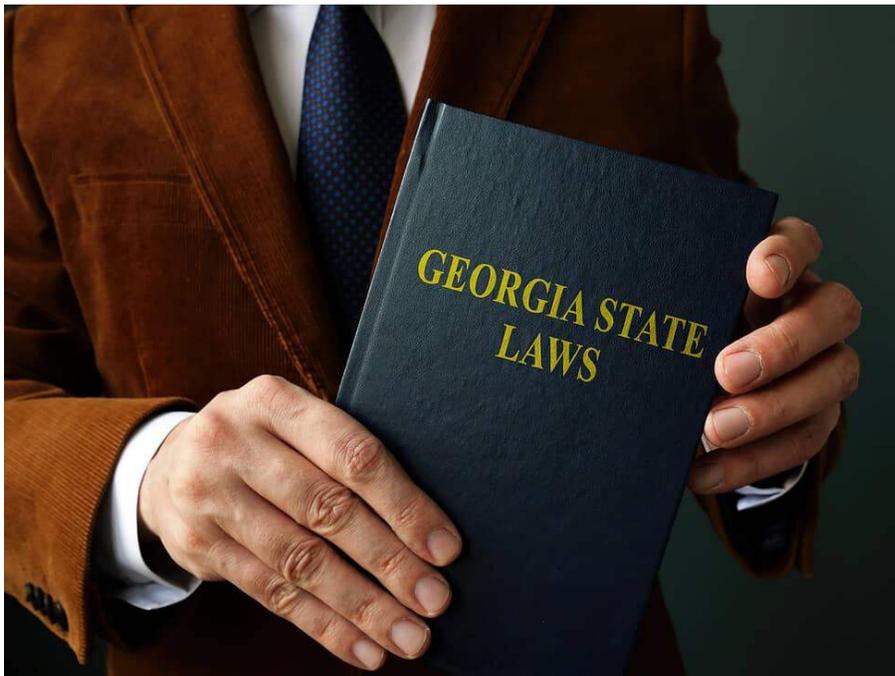
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ROBERT'S RULES TRAINING

GAGOP State Corporate Chairman Halts a Challenge to Republican Breach of Law

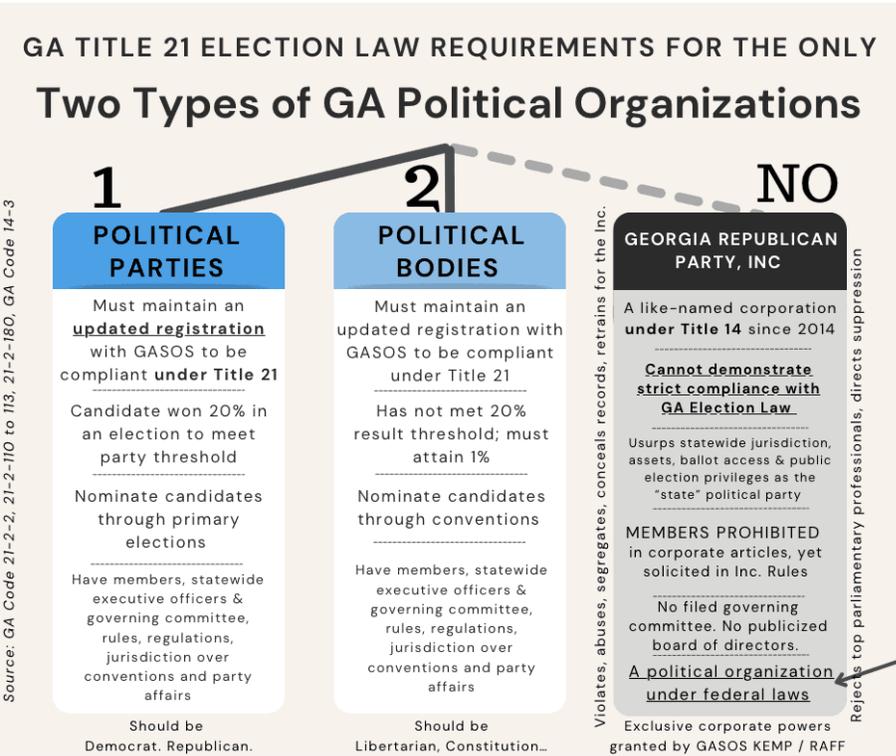
Robert's Rules of Order
 Bootcamp
 GRG ROBERT'S RULES
 ACADEMY

by GRG Staff | Feb 1, 2024 | GRP-GOP, Public Election Integrity, Republican Official Off-Platform, Uncategorized | 3 comments



CORPORATELY HALTED Point of Order
 Presented by Elected State
 Committeewoman Susan P. Opraseuth at
 the State "Party" Meeting held at the King
 and Prince Hotel at Saint Simon's Island
 on January 20th

THE LITIGIOUS, STATE- CONTROLLING GEORGIA REPUBLICAN PARTY, INC. IS FAILING TO PRODUCE COMPLIANCE WITH GA ELECTION LAW. IT IS NOT AN OFFICIAL GA POLITICAL ORGANIZATION.



On a Daily Basis Republicans are Warning

State Chairman McKoon Against Continuing to Lead an Imposter State Corporation Under the False Protection of the Georgia Secretary of State. Voters Deserve to Know the Truth about their Primary Ballots and "GOP" Corporate Candidates.

By State Committeewoman Susan P. Opraseuth:

In today's complex political landscape, the erosion of traditional governance principles is a growing concern for many conservatives who value the pillars of a republic. This concern hits close to home for me, right here in Georgia, where I've witnessed what appears to be a troubling trend within the conservative Republican party. Throughout our state, I've observed tactics reminiscent of those used by global entities to suppress dissent and control narratives.

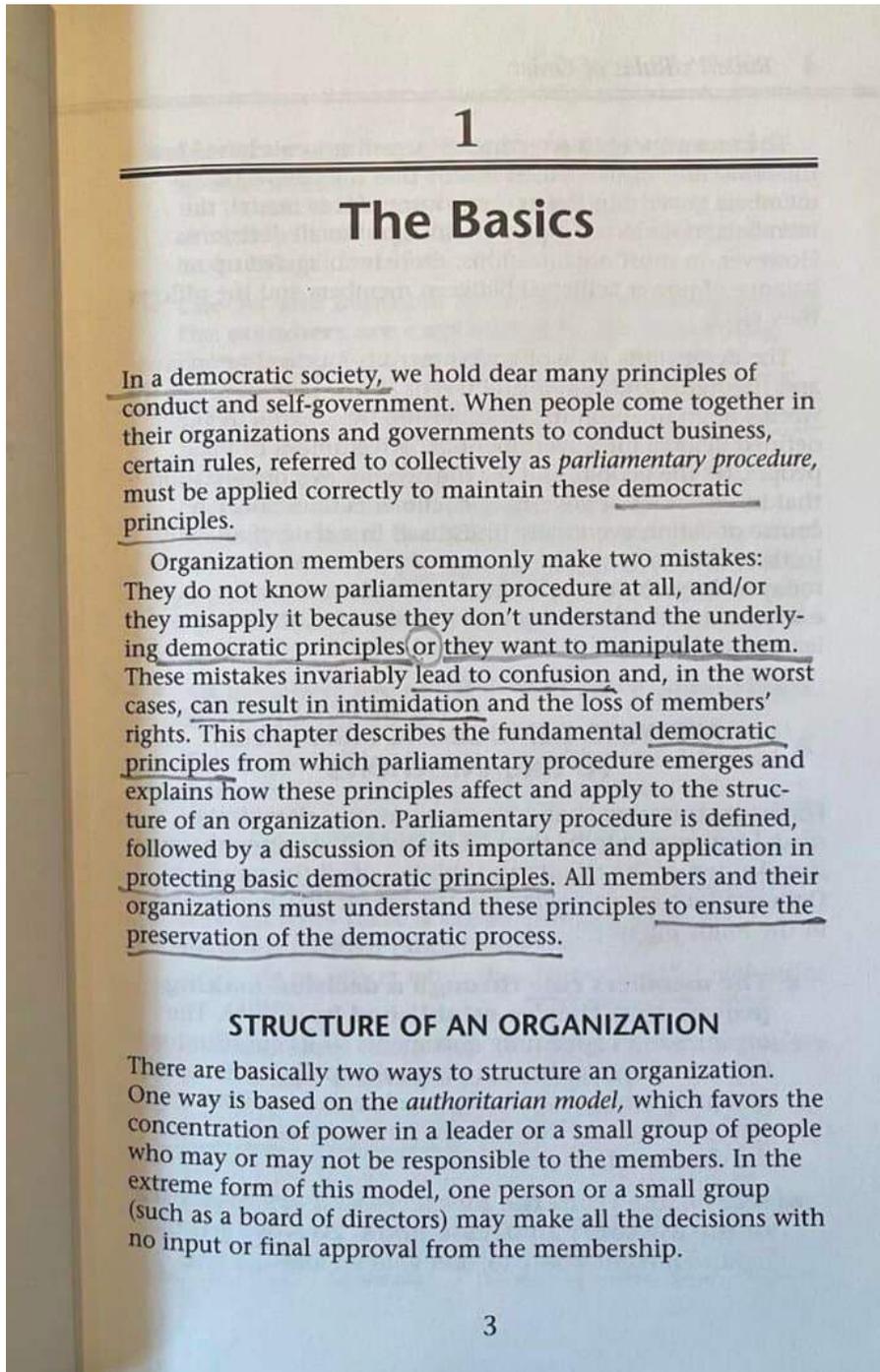
It's disheartening to see corporate activists within the Georgia Republican Party, INC. ("GRP, INC.") disregard the voices of citizens who are calling for a legitimate, legally compliant party. The law is crystal clear: political parties must adhere to GA Election Code 21-2-110/111 regarding its official registration and political party structure. More than 178 governing committee members should be filed with the Georgia Office of the Secretary of State, *but they are not*. Corporate maneuvers and manipulations have managed to convince many that compliance can wait.

As an elected State Committee Member of the "State Party" representing thousands of voters, I take my duty seriously. However, I have not agreed to serve under GA Corporate Law in a non-member, nonprofit corporation, according to its formation documents, corporate attorneys, and executives. This is a decidedly *non-democratic structure* of a PAC-like federal political organization under IRS code. I have also not agreed to participate in processes that simply transfer corporate power among executives desiring to control our state's representative system. Finally, knowing these facts, I cannot, in good conscience, solicit corporate donations from those who deceptively believe they are "members."

Corporate Formation Documents: The
NON-MEMBER GRP, Inc. is Lacking a
Basic DEMOCRATIC Structure

We exhaust ourselves to exercise *Robert's Rules of Order* as an organizational tool, yet they are *for democratic societies unlike us*. I have witnessed total failure and futility in exercising *democratic procedures* within this *self-perpetuating authoritarian corporate structure of the GRP, INC*. Recently, I watched executives reject the cohesive findings of five of the top professional Parliamentarians in our nation, including the President of the American Institute of Parliamentarians. Simply put, basic democracy is unwelcome to these corporate politicians.

EXHIBIT 5-5



My concerns about corporate governance within our party have been mounting for years. I've personally experienced the systematic withholding of basic resources at both county and state levels. During the 2023 reorganization cycle, the corporation statewide barely attained 25% of its earned county delegates and thousands of precinct committee positions went unclaimed—an alarming indicator of weak Republican governance. The state corporation did not so much as issue a press release for this critical

EXHIBIT 5-6

statewide reorganization.

What's even more troubling is the inside lack of transparency and communication. When I sought the contact list of my fellow State Committee members, I was required to sign a Non-Disclosure Agreement including information that should be filed within state public records that the Georgia Secretary of State cannot produce. After I wrote these concerns to my fellow committee members, I was publicly ridiculed by Executive Director Travis Bowden and deterred from conducting further committee communication by Corporate General Counsel Alex Kaufman. Corporate State Chairman Josh McKoon appointed both of these individuals. Additionally, Mr. Bowden's current role follows his and Mr. McKoon's nearly four years of exploitative treatment of local Republicans, including Chatham and Fulton counties, on behalf of former State Chairman David Shafer's corporate "appeals" committee instead of one lawfully prescribed by a political party committee under the GA Election Code.

All of this flies in the face of my role as an elected representative, entrusted to express the concerns of my constituents. How can we govern effectively if we can't even communicate with each other without legal and corporate barriers? How do we win in 2024 without a strong communication network for planning?

In a proper political party, the State Committee should be a fully representative governing body that performs under the Georgia Election Code. I am committed to advocating for proper corrections to uphold the values of representative government and not corporate interests. Until these constantly damaging blows can be abated, I fully believe that those who know the right and democratic ways of a proper political party should continue in them. Corporate executives and the state government must be reined in with every citizen's effort.



Paid for by the Georgia Republican Party, Inc.
 Not authorized by any candidate or candidate's committee
 Post Office Box 550008 • Atlanta, Georgia 30355
 404.257.5559 WWW.GAGOP.ORG 404.257.0779 fax
 Josh McKoon, Chairman • Laurie McClain, Treasurer

The recent June 2023 acknowledgment by the Republican State Committee that there is a problem within our party—namely, the presence of the Georgia Republican Party, INC. as a separate corporate entity—validates the issues I’ve been raising. We’re not being divisive; we’re standing up against a like-named corporation that hijacked our party in 2014. We simply want our legally compliant political party back

Despite this recognition, the establishment leadership seems more interested in maintaining the status quo. They’ve cited a lawsuit involving the corporation as a reason for delaying the re-establishment of the party. While they take public ballot access as a corporation, the political party is in shambles, without funds, and

electors are repressed.

Moreover, the corporation's reliance on the Georgia Secretary of State's office for a "party" administrative pass without public records to back it up, continues to be a problem. This same office, led by notorious Secretary Raffensperger, has faced criticism for its handling of the 2020 presidential election, voting systems, and ballots, making quality control seem taboo. Corporate interests are flooding out Georgia's rightful representative government, and basic citizen rights with it.

At our recent January Republican State Committee meeting, the authoritarian style of governance was on full display. From the lack of timely agendas to the Chairman's public dressing down of a fellow officer, it was clear that any strong ideas of democratic processes were stifling to the corporate environment.

During this meeting, I raised a Point of Order regarding a perceived breach of Georgia's Election Laws, only to be interrupted and asked to email my concerns instead. This attempt to silence legitimate concerns further illustrates the disregard for democratic principles within our party. The facts were irrefutable.

CORPORATELY HALTED Point of
Order Presented by Susan P.
Opraseuth

It's time to reclaim the true spirit of the Republican Party in Georgia – a party that upholds the Rule of Law, respects the voices of its members, and protects one of our most basic American birthrights – our guaranteed representative form of government.

Conflicting Claims: The GRP, Inc. has Self-Identified as a State Political Party. In 2020, it Claimed it had Members in U.S. District Court.

EXHIBIT 5-9

PARTIES

11. Plaintiff Georgia Republican Party, Inc. ("the State Party") is a state committee, as defined by 52 U.S.C. § 30101(15), a Georgia Political Party as defined by O.C.G.A. § 21-2-2(25), a domestic non-profit corporation, and the official Republican Party organization of the state of Georgia. The State Party represents a diverse group of members and stakeholders across Georgia, including elected officials, candidates for elected office, state committee members, advisory caucuses, affiliate groups, and active voters. These members and constituents, including many eligible voters, regularly support and vote for candidates affiliated with the Republican Party, including candidates seeking election to the United States Senate. The State Party's members vote in federal elections and aid and urge others in voting. See Declaration of Stewart Bragg, a true and correct copy of which is attached as Exhibit A.

Case 2:20-cv-00135-LGW-BWC Document 1 Filed 12/17/20 Page 1 of 26

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

GEORGIA REPUBLICAN PARTY, INC., a
state political party committee, NATIONAL
REPUBLICAN SENATORIAL COMMITTEE,
PERDUE FOR SENATE, GEORGIANS FOR
KELLY LOEFFLER, BETHANY BALLARD,
ASHLEY GILLES, and JEAN M. SEAVER,

Case No. _____

Plaintiffs,

DECLARATORY AND
INJUNCTIVE RELIEF
SOUGHT

v.

BRAD RAF
capacity as

NO STATE REPUBLICAN GOVERNING
COMMITTEE IS FILED WITH THE GEORGIA
SECRETARY OF STATE AS REQUIRED,
AMONG OTHER PROBLEMS. THE
CORPORATE PAC-LIKE STRUCTURE MAY
BE DIRECTLY SUBVERSIVE TO THE
STATE SYSTEM OF GOVERNMENT AND
MAINTAINING THE DEEPLY-ROOTED
GEORGIA OLIGARCHY. THE SITUATION
SO SORDID TO CONSTITUTIONAL RIGHT
THAT CORPORATE CONTROLLERS SHU
DOWN THE CHALLENGE FROM ELECTED
MEMBER OPPOSED AT THE "PARTY
INC" ASSEMBLY ON JANUARY 20, 2021

LINK TO ANOTHER FEASIBLE LEGAL REMEDY COORDINATED BY FELLOW SUBJECT MATTER EXPERT HANK SULLIVAN. DESPITE THE INVOLVEMENT OF VICE CHAIRMEN AND A CAUCUS, IT WAS ALSO DISREGARDED BY CORPORATE OLIGARCHS. [Click Here.](#)

HOW ENTRENCHED IS CORPORATE AUTHORITARIAN CONTROL? So Deep that the GRP, Inc. Missed its January 11th State Ballot Deadline. [Click Here.](#)

Susan P. Opraseuth can be reached directly at goreclaimga@proton.me.

 [Bookmark](#)

3 Comments



Merrybelle Hodges on February 2, 2024 at 6:20 pm [\(Edit\)](#)

[Reply](#)

This is an excellent article, crystal clear and concise.

The gaslighting that continues from leadership is egregious.

Thank you for this great work!

IN THE SUPERIOR COURT FOR THE COUNTY OF CATOOSA
STATE OF GEORGIA

STEVEN M. HENRY, LARRY C. BLACK,	§	
JEFF LONG, and VANITA C. HULLENDER	§	
	§	
Plaintiffs	§	Civil Action File No:
	§	SUCV2024000211
v.	§	
	§	
CATOOSA COUNTY REPUBLICAN PARTY,	§	
an unincorporated association; BETH CASS;	§	
RUTH FANT; SHERRE BALES; JOANNA	§	
HILDRETH; MARIE MORRE; DEBBIE	§	
MORRISON; JACK BYERS; MARY BUGEA;	§	
REGINA GRAY members of the Catoosa	§	
County Republican Party	§	
	§	
Defendants	§	

**ACCOMPANYING PETITION AND EXHIBITS SUPPORTING MOTION TO INTERVENE
FOR LIMITED PURPOSES SUBMITTED BY APPLICANT SUSAN P. OPRASEUTH**

Applicant hereby files this petition supporting her motion to intervene to provide accompanying pleadings in support of Plaintiffs and their respective citizen rights to a lawful elective franchise and right to hold office in the State of Georgia within Catoosa County’s constitutional jurisdiction.

As citizens of Georgia counties, Applicant and Plaintiffs share the same rights enshrined in Articles 1 and 2 of the Georgia Constitution, including the right to equal protection of laws and the lawfully executed state powers. As such, the citizens of Applicant’s county, including herself, will be bound by the judgment of this Honorable

Court in future “political party” affairs, thereby entitling her to the right to intervene under GA Code 9-11-24 and Federal Rule 24(a)(2). Applicant and Plaintiffs are citizens who claim the principles of the same national political party and have the right to publicly engage in committee affairs of a lawful “state party” through properly elected local “party officials.” The shared authorities over Catoosa County and Fulton County must be transparent, consistent, known, and lawful for Georgia citizens to enjoy the guaranteed right to a Republican Form of Government under Article IV, Section 4 of the U.S. Constitution.

Those professing to execute the responsibilities of Georgia statutes, such as the so-called “Catoosa County Republican Party” are without excuse. County election superintendents are also responsible for ensuring that any state action they conduct is on behalf of a lawful political party. Deprivation of rights under color of election laws must not occur in the State of Georgia. And, no citizen may make an attestation of allegiance to a private corporation masquerading as a political party.

Political parties have an international history of besetting nations with troubles. On December 1, 1933 the Reich Government of Germany passed the *Law to Secure the Unity of Party and State*. It declared the National Socialist German Workers' Party to be the bearer of the concept of the German state and “inseparable from the state.” The Third Reich also declared the party to be a “corporation under public law” and “the *Führer* determines its statutes.” (§ 1). Six years later, World War II began in Europe. A controversial election with national implications occurred six years after the 2014 authorization of the GRP, Inc. as the Republican State Political Party.

CASE PRECEDENCE

Following is striking case precedence involving the Georgia Republican Party, Inc.

On December 17, 2020, the Georgia Republican Party, Inc. filed as plaintiffs in the United States District Court for the Southern District of Georgia, Brunswick Division (*Georgia Republican Party, Inc. et al v. Brad Raffensperger, et al*, 2:20-CV-00135 (11th Cir. 2020)). They state:

Plaintiff Georgia Republican Party, Inc. (“the State Party”) is a state committee, as defined by 52 U.S.C. § 30101(15), a Georgia Political Party as defined by O.C.G.A. § 21-2-2(25), a domestic non-profit corporation, and the official Republican Party organization of the state of Georgia. The State Party represents a diverse group of members and stakeholders across Georgia...

The federal status of the corporation as a “state committee” **of a political party** for reporting purposes to the Federal Elections Commission is irrelevant to the requirements for Georgia’s political parties to maintain strict compliance with Title 21 GA Election Code (“Title 21”). The Georgia Republican Party, Inc. prohibits members in its February 10, 2014 Articles of Incorporation, and then claims to serve members that **it does not have**. There are no known laws granting private corporations the power of a “State Party.” Furthermore, the Honorable Judge Lisa Godbey Wood dismissed the case with prejudice on December 18, 2020. One of the grounds for dismissal was lack of standing.

On July 8, 2014, Qiana Keith filed a federal civil rights complaint (*Qiana Keith v. Georgia Republican Party et al*, 1:14-cv-02159-CAP (11th Cir. 2020)), involving both entities that she observed trying to act [alarmingly] in tandem:

Plaintiff Qiana Keith (“Ms. Keith” or “Plaintiff”) respectfully submits the following Complaint against Defendants Georgia Republican Party and Georgia Republican Party, Inc. (referred to collectively herein as the “Party”), and John Padgett (“Padgett”; referred to collectively with the “Party” as “Defendants”)...

The Complaint also includes the statement (pg 3):

Given that the adverse actions against Ms. Keith occurred both before and after the creation of the Georgia Republican Party, Inc., Ms. Keith alleges that both entities are responsible for the unlawful conduct alleged herein.

John Padgett formed the like-named corporation with his attorney, Anne Lewis, and apparently began converting all assets from the political party. In 2018, the GRP, Inc., settled with Keith for a substantial sum of money.

On September 16, 2021, John Padgett filed a case in Fulton County Superior Court for indemnity against the Georgia Republican Party, Inc., knowing the corporation had gained possession of all party assets. In his original complaint, he stated:

Padgett was elected as the Chairman of the Georgia Republican Party in 2013. Based upon advice of counsel, Anne W. Lewis, the unincorporated political party formed a non-profit corporation called the Georgia Republican Party Inc. in 2014. John Padgett served as the Chairman of the Party and the initial director of the corporation. (*John Padgett vs. Republican Party of Georgia, Inc.* Fulton County, 2021CV354612, Complaint, pg 1)(“*Padgett*”).

On September 29, 2023, Senior Judge Alfred Dempsey granted Summary Judgment in favor of the Georgia Republican Party, Inc. “GAGOP.” The order contained language utilizing the term or unique entity “GAGOP” as a bridge between the abandoned party and current corporation, stating:

Mr. Padgett was elected Chairman of the Georgia Republican Party in 2013. At the time of Mr. Padgett’s election as Chairman, the public records of the Secretary of State reflect that the GAGOP was [formerly] an unincorporated entity... Seven days after the “Racial Allegations,” public records reflect that Mr. Padgett incorporated the GAGOP. Upon incorporating in the GAGOP, Mr. Padgett also became the GAGOP’s CEO and CFO. (*Padgett*, Order, pg 1).

STATEMENT OF FACTS

1.

County jurisdictions in Georgia do not have separate “political parties.” Under GA Code 21-2-111(a), a political body gains status as only a state political party to exercise statewide jurisdiction and control over party affairs and conventions by its Title 21, Chapter 2 rules and regulations.

2.

Political parties must register and maintain the compliance of that registration with the Office of the Georgia Secretary of State. A registered political party under Chapter 2 of GA Title 21 Election Code must establish and maintain its committees under the strict provisions of Article 3, which is clearly stated in GA Code 21-2-110 & 111, GA Code 21-2-153, GA Code 21-2-154. The State Elections Division maintains these registrations.

3.

There are no Rules of the “state executive committee” [governing committee] on file with the Office of the Georgia Secretary of State that appear to bear a proper certification by any state “chairperson” (Exhibit 3-2).

4 (a).

Applicant notified Catoosa County Elections Superintendent of matters contained herein on March 1 and March 11, 2024 with documents attached in Exhibits 1 & 2.

4 (b).

A committee association entity in Catoosa or any other county exercising political party committee powers may only exist as definitive committees of a lawful, official state political party comporting with GA Code 21-2-111(a, b). Rules must be adopted under Chapter 2 of Title 21 and remain consistent with the rules and regulations of the state

executive committee [governing committee] of the State Party. (Exhibits 1 & 2).

5.

The Catoosa County Republican Party failed to name the Georgia Republican Party, Inc. in its Rules of Order contained within the “rules” document submitted in their “Answer.”

6.

To protect the entitled, basic rights of citizens to a lawful political franchise and their right to hold office under GA Code 1-2-6, political party mandates are found exclusively in GA Election Code 21-2-2 (23, 24, 25), 21-2-110, 21-2-111, 21-2-112, 21-2-153, 21-2-154, 21-2-131... and more.

7.

Political party candidates have a right to lawfully qualify for public office in Georgia counties. They have a right to full disclosure of entities to which they are making binding commitments on their qualifying paperwork. (Exhibits 1 & 2).

8.

County candidates can either submit their qualifying fees to a lawful political party committee or to a county election superintendent, who then submits 25% of the fees to a lawful state political party committee. GA Code 21-2-131(c)(1), 21-2-131 (c)(3)(B).

9.

Title 21 does not provide for the submission of qualifying fees to any private corporation.

10.

GA Code 21-2-154(a) requires that such certification [of political party candidates] shall not be accepted if the political party has not registered with the

Secretary of State as required in Article 3 of this chapter. Registrations must be amended when changes occur to maintain compliance. [Chapter 2 of Title 21].

11.

Party History: On February 7, 2014, agents of the Georgia Republican Party, which at the time was a political party registered with the Elections Division of the Office of the Georgia Secretary of State, formed a corporation with the same name by filing it with the State Corporations Division - **Georgia Republican Party, Inc.** (“GRP, Inc.”). (Exhibit 3).

12.

On February 10, 2014, Secretary of State Brian P. Kemp issued GRP, Inc. a CERTIFICATE OF INCORPORATION as a Domestic Non-Profit Corporation under Chapter 3 of Title 14. (Exhibit 4).

13.

Thereafter, the Office of the GA Secretary of State authorized the corporate paperwork of the GRP, Inc., formed under Chapter 3 of Title 14, **to replace** the Georgia Republican Party registration documents and governances adopted under Chapter 2 of Title 21. There is no known legal provision for merger (14-3-1101, etc.). (Exhibit 3 & 4).

14.

The organizational structure of the GRP, Inc. under Georgia Title 14 Corporate Nonprofit Law, Chapter 3 does **NOT** appear to comport with the political party structure required by Georgia Title 21 Election Code, Chapter 2.

15.

Since the act of “replacement” in 2014, GRP, Inc. has operated with all of the privileges of the Republican State Political Party with statewide jurisdiction and control of party affairs, including primary election ballot access. (Affidavit & Exhibit 2-9 & 3).

16.

This “replacement” granted a corporation, its corporate board of directors, its corporate committees, and corporate officials the authority to conduct statewide and local jurisdictional party affairs through the State Elections Division.

17.

Rules and regulations to which candidates and party officials can lawfully commit may be adopted only under Chapter 2 of Title 21 per GA Code 21-2-153(e)(9). The qualifying affidavit produced by the GASOS makes no reference to a private corporation for legal commitments, allegiance, or fees. (Exhibit 1).

18.

The GRP, Inc. and its local corporate committees have received qualifying fees for public candidate qualifications amounting to hundreds of thousands of dollars since 2014.

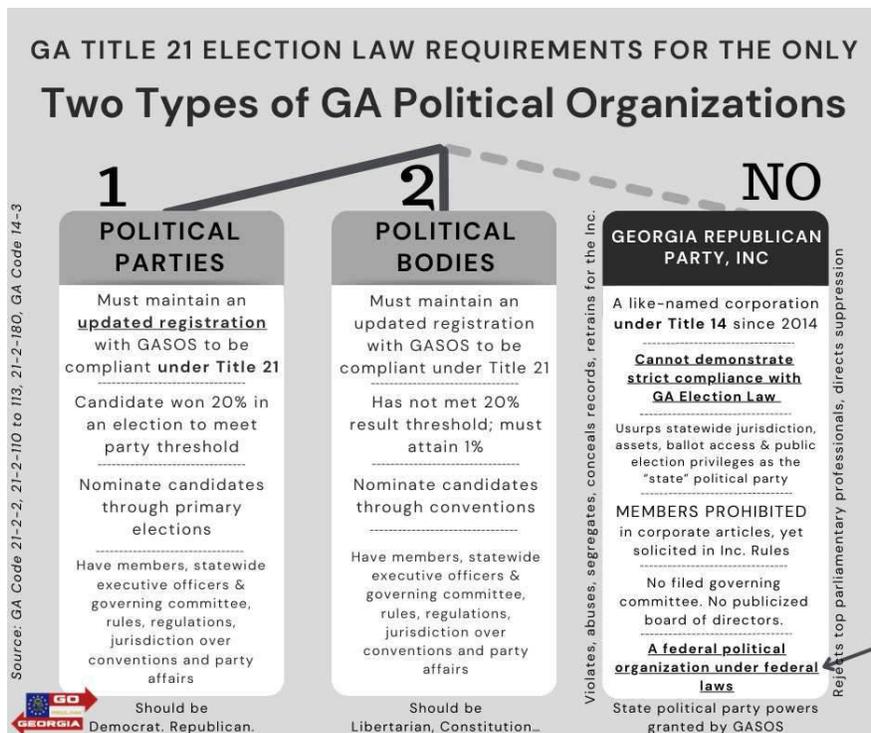


Figure A. Lawful GA Political Organizations

17.

The GRP, Inc. stated in its Articles of Incorporation that its lawful purpose is “to conduct and carry out the not for profit work of the Corporation exclusively as a political organization in a manner consistent with section 527 of the Internal Revenue Code of 1986... and for such related purposes **as may be permitted to corporations...**”

19.

The self-declared federal “political organization” status of the GRP, Inc. under the federal Internal Revenue Code does not bestow Georgia “political organization” status on Georgia nonprofit corporations “acting as” political parties.

20.

To the present day, the Office of the Georgia Secretary of State has continued this “replacement” authorization of a corporation as the State Republican Political Party.

21.

Compliant documents for a lawful political party cannot be produced by the Office of the GA Secretary of State per GASOS Open Records Request Remittances: #23-475, 23-252, 23-339, 23-357, 23-396, 23-443, 23-477, 24-52, 24-51, 24-97. (Exhibit 1).

22.

GRP, Inc. files only a 3-member list of corporate officers, instead of a political party state executive committee with the GASOS Division. No governing state executive committee, which should be 178 elected members, is on file with the GA Secretary of State Election Division. (Exhibit 3-13).

23.

Despite multiple formal requests, the GA Secretary of State Open Records Division, nor the Georgia Archives have been able to locate public records for the Republican State

Political Party under Title 21 going back to the beginning of permanent retention requirements (circa 2002).

24.

The GRP Inc. acting as the State Republican Party of Georgia **prohibits members** in its Articles of Incorporation, contrary to what is required for political parties per GA Code 21-2-2(25) and 21-2-111(a), including that they are affiliations of electors consisting of member committees. (See #20).

25.

The GRP, Inc. defines and solicits members in its corporate bylaws (Rules of the Georgia Republican Party, Inc. (gagop.org)) by using the term 100 times, which is contrary to GA Nonprofit Corporations Code 14-3-206, which states that “bylaws may contain any provision for regulating and managing the affairs of the corporation that is not inconsistent with law or the Articles of Incorporation.” (Exhibit 3).

26.

For lawful standing, it appears that political parties in the State of Georgia must be subservient to the GA Constitution and Georgia Law exclusively under Title 21.

27.

Applicant attended the corporate “State Committee” of the GRP, Inc. on June 8, 2023 in Columbus, GA. The corporation resolved to bring itself into conformity with the GA Elections Code, but decided to delay action. State filings remain non-compliant despite their active corporate affairs within the 2024 election cycle (Exhibit 3 & 6).

28.

The corporate “State Executive Committee” named in the Rules of the GRP, Inc. has the features of a corporate board of directors exercising itself over Georgia electors, which is a small centralized, authoritarian organizational structure.

29.

The parliamentary authority originally claimed by the Georgia Republican Party is *Robert’s Rules of Order* (current edition). Thomas Jefferson *Manual* is unchallenged as the first to define and interpret parliamentary principles for our democratic republic.¹ A lawful political party is a democratic model reflective of an American government.

30.

Political party authority and ballot access appear to be invalid and illegal functions for a GRP, Inc. and has been since 2014. (Exhibit 3).

31.

Receipts are missing from at least monthly FEC reports covering May - June 2023, the months which citizens across the state paid to register to serve as delegates or alternate delegates to the GAGOP 2023 Corporate State Convention in Columbus, GA. Applicant’s receipt appears to be missing.

32.

The GRP, Inc. continues to file with the Georgia Government Transparency and Campaign Finance Committee as a non-candidate committee political party² per GA Code 21-5-34(e).

¹ Robert, General Henry M. *Robert’s Rules of Order, 12th Edition, Newly Revised*, (New York: PublicAffairs, 2020), 49.

² Last filing: 2/8/24

https://efile.ethics.ga.gov/#/exploreCommitteeDetail/_i9fOa9S_5OkD74o3r50sJP4048PFnxLXRUfdOLcQk01/null/null/null/2024

CONCLUSION

Because the Georgia Republican Party, Inc. appears to be non-compliant with Chapter 2 of the Georgia Title 21 Election Code, the entity named “Catoosa County Republican Party,” which can only conduct party affairs as a committee of a lawful political party, does not appear to have lawful ballot access through which to certify candidate qualification paperwork. The 2024 qualification paperwork and affirmation of allegiance allowed by GA Code 21-2-153(b) does not disclose the identity and Title 14 bylaws of the GRP, Inc., thus apparently placing Plaintiffs at risk. Additionally, the Catoosa County Republican Party also does not appear to have the proper lawful authority to process fees submitted by citizen Plaintiffs and still protect their entitled rights to a lawful elective franchise and the right to hold office. Any interaction with the Catoosa County Republican Party appears to place Plaintiffs at risk for legal and constitutional injury. Further, it is the opinion of the Applicant that the penalty for political party registration non-compliance in GA Code 21-2-110(f) be reviewed by this Honorable Court.

Applicant respectfully requests that her motion to Intervene be **GRANTED** and that Catoosa County Republican Party receive discipline and be stripped of all statutory authority to act under any provision of Title 21 Election Code. Though Applicant requests that Plaintiffs’ Motion for Contempt be **GRANTED**, Applicant also respectfully asks that this Honorable Court consider the deceptive circumstances herein described and whether this Honorable Court has the authority to order a so-called committee association of a private corporation to conduct the qualifying responsibilities lawfully due Plaintiffs.

Further, Applicant requests that this Honorable Court pursue all legal means to protect citizens from further injury by the Georgia Republican Party, Inc., its corporate

state committees, and subordinate corporate committees including, but not limited to, referring this matter to state and federal law enforcement for investigation under Chapter 14 of GA Title 16 and, specifically, Part 2 of Article 1 of Chapter 11 of Title 16.

Dated this 22nd Day of March, 2024.

Humbly and respectfully submitted,





SUSAN P. OPRASEUTH, PRO SE

4495 Mariners Ridge

Alpharetta, GA 30005

(513) 284-4321

susan@goreclaimga.org

Attached: Motion to Intervene, Sworn Affidavit, and Six Exhibits

AFFIDAVIT OF FACT

I, Susan P. Opraseuth, hereinafter Affiant, personally appeared before the undersigned notary public, and under oath or affirmation state the following facts:

Affiant is a taxpayer and voter in Fulton County, Georgia.

The following documents contained within the State of Georgia and Catoosa County public record are attached exhibits.

1. Letter "Qualifications & GA Title 21" sent to Catoosa County Election Superintendent on March 1st at 1:57 pm. (6 pages)
2. Letter "Qual Fee Routing - GRG" sent to Catoosa County Election Superintendent on March 11th at 11:45 pm. (14 pages)
3. Georgia Secretary of State Open Records Remittance #24-97, dated March 20th, 2024. (17 pages)

To: Request of Sarah Thompson

March 14, 2024:

Elections Division:::

Pursuant to open records laws, please provide me with :

ALL of the current registration documents required by GA Code 21-2-110(a)(1-6) for the GA Code 21-2-2 (24,25) Republican State Political Party that is operating with statewide jurisdiction and control over party affairs in the State of Georgia per GA Code 21-2-111(a).

GASOS #24-97 remittance includes the following files:

- a) Corporate Rules of the Georgia Republican Party, Inc. that bear no visible certification. Pgs 1-6, 22, 23, 44-46. (published on gagop.org).
- b) Amended Annual Registration of the Georgia Republican Party, Inc. filed on 9/15/2023.

c) Articles of Incorporation of the Georgia Republican Party, Inc., filed on 2/10/2014, effective February 7, 2014.

4. Certification of the Georgia Republican Party, Inc. by Secretary of State Brian P. Kemp, February 7, 2014. (1 page)

Affiant is am not an expert in the law, however does know right from wrong. If there is any man or woman damaged by any statements herein if he will inform me by facts, Affiant will sincerely make every effort to amend. Affiant hereby and herein reserves the right to amend and make amendments to this document as necessary, in order that the truth may be ascertained, and proceedings justly determined.

My signature verifies that Affiant, Susan P. Opraseuth, will testify as to these facts, in open court, Affiant does hereby swear and affirm that all herein be true and accurate to the best of their knowledge and belief under penalty of perjury.

Executed on this twenty-first day, of the third month, in the year of our Lord and Savior, two thousand twenty-four.

Susan P. Opraseuth
Signature 3-21-24

Susan P. Opraseuth
Susan P. Opraseuth 3-21-24

Subscribed and affirmed, or sworn to, before me this 21st day of March, 2024 in the County of Fulton, State of Georgia.

Nadeem Faizi



Notary Public Signature

02-25-2025

Commission Expire Date

AFFIDAVIT OF FACT

I, Sarah E. Thompson, hereinafter Affiant, personally appeared before the undersigned notary public, and under oath or affirmation state the following facts:

Affiant is a taxpayer and voter in Bulloch County, Georgia.

The following documents contained within the State of Georgia and Catoosa County public record are attached exhibits.

1. Letter "Qualifications & GA Title 21" sent to Catoosa County Election Superintendent on March 1st at 1:57 pm. (6 pages)
2. Letter "Qual Fee Routing - GRG" sent to Catoosa County Election Superintendent on March 11th at 11:45 pm. (14 pages)
3. Georgia Secretary of State Open Records Remittance #24-97, dated March 20th, 2024. (17 pages)

To: Request of Sarah Thompson

March 14, 2024:

Elections Division:::

Pursuant to open records laws, please provide me with :

ALL of the current registration documents required by GA Code 21-2-110(a)(1-6) for the GA Code 21-2-2 (24,25) Republican State Political Party that is operating with statewide jurisdiction and control over party affairs in the State of Georgia per GA Code 21-2-111(a).

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- b) Amended Annual Registration of the Georgia Republican Party, Inc. filed on 9/15/2023.

c) Articles of Incorporation of the Georgia Republican Party, Inc., filed on 2/10/2014, effective February 7, 2014.

4. Certification of the Georgia Republican Party, Inc. by Secretary of State Brian P. Kemp, February 7, 2014. (1 page)

Affiant is am not an expert in the law, however does know right from wrong. If there is any man or woman damaged by any statements herein if he will inform me by facts, Affiant will sincerely make every effort to amend. Affiant hereby and herein reserves the right to amend and make amendments to this document as necessary, in order that the truth may be ascertained, and proceedings justly determined.

My signature verifies that Affiant, Sarah E. Thompson, will testify as to these facts, in open court, Affiant does hereby swear and affirm that all herein be true and accurate to the best of their knowledge and belief under penalty of perjury.

Executed on this twenty-first day, of the third month, in the year of our Lord and Savior, two thousand twenty-four.

Sarah E. Thompson
Signature

SARAH E. THOMPSON 3/21/24
Sarah E. Thompson

Subscribed and affirmed, or sworn to, before me this 21st day of March, 2024 in the County of Bulloch, State of Georgia.

Kelly Slowinski
Notary Public Signature
03-30-2025
Commission Expire Date





Sarah Thompson <sarahpatriot99@gmail.com>

Qualifiers & Republican Title 21 Important

Sarah Thompson <sarahpatriot99@gmail.com>

Fri, Mar 1 at 1:57 PM

To: <team@goreclaimga.org>

Bcc: <egale@mcintoshcounty-ga.gov>, <maddox.denise2@gmail.com>, <vaughn.gable@haralsoncountyga.gov>, Brook Schreiner <bschreiner@buttscounty.org>, <elections@co.newton.ga.us>, <ymack@hallcounty.org>, <voterreg@dekalbcountga.gov>, Darin McCoy <darin.mccoy@evanscounty.org>, Cersha Snell <csnell@longcountyga.gov>, <deidre.holden@paulding.gov>, <jphillips@trc-lawfirm.com>, <shonda@applingco.com>, <lellison@habershamga.com>, <jwinter@turnercountygeorgia.com>, <cbaxter@madisonco.us>, <lbolton@lincolncountyga.com>, <atcoelections@hotmail.com>, <arussell@baconcounty.org>, Carla Heard <bd.elect@bakercountyga.com>, <baldwinprobate@yahoo.com>, <registrars@co.banks.ga.us>, <mfranklin@barrowga.org>, <kirkj@bartowcountyga.gov>, <electionsbenhill@aol.com>, <belections@windstream.net>, <tgillon@maconbibb.us>, <jfordham@bleckley.org>, <bcelections@btconline.net>, <brookscoelections@windstream.net>, <cindyreynolds@bryan-county.org>, <burkereg@burkecounty-ga.gov>, <projudgeholder@windstream.net>, <ddfelix@co.camden.ga.us>, <candlerprobate@gmail.com>, <elections@carrollcountyga.com>, <catoosaelections@catoosa.com>, <bhodges@charltoncountyga.gov>, <biwooten@chathamcounty.org>, <jonigoodwin@yahoo.com>, <chattoogaelections@hotmail.com>, <voterhelp@cherokeega.com>, <charlotte.rosebee@accgov.com>, <clayprobatejudge@gmail.com>, <elections@claytoncountyga.gov>, <clinchelections@clinchcountyga.gov>, <ElectionsInfo@cobbcounty.org>, <rachel.roberts@coffeecounty-ga.gov>, <ngay@columbiacountyga.gov>, <cookelections@windstream.net>, <agay@coweta.ga.us>, <b.peacock@crawfordcountyga.org>, <elections@crispcounty.com>, <tvaughan@dadecounty-ga.gov>, <gferguson@dawsoncounty.org>, <elections@decaturcountyga.gov>, <al.mccranie@yahoo.com>, <dooly.county.elections@gmail.com>, <docovoterregelections@dougherty.ga.us>, <bdofelections@co.douglas.ga.us>, <elections@earlycounty.org>, <judgerodgers@planttel.net>, <boe@effinghamcounty.org>, <kcurry@emanuelco-ga.gov>, <elections@fannincountyga.org>, <electionsgroup@fayettecountyga.gov>, <voter@forsythco.com>, <tcreason@franklincountyga.gov>, <elections.voterregistration@fultoncountyga.gov>, <gilmerelections@ellijay.com>, <probate@glascockcountyga.com>, <glynnelections@glynncounty-ga.gov>, <shicks@gordoncounty.org>, Kathleen Coine Mayers <ckathleen@greenecountyga.gov>, <voterregistration@gwinnettcountry.com>, <elections@hallcounty.org>, <boer@hancockcountyga.gov>, <sjarrett@harriscountyga.gov>, <registrar@hartcountyga.org>, <tadams@heardcountyga.com>, <aypitts@co.henry.ga.us>, <elections@houstoncountyga.org>, Irwin County Elections <electionsirwincounty@aol.com>, Jennifer E. Logan <jelogan@jacksoncountygov.com>, <jasperprobate@bellsouth.net>, <jeffdavisselections@gmail.com>, <sgray@jeffersoncountyga.gov>, <probate8@gmail.com>, <dkillingsworth@johnsonco.org>, <marion.hatton@jonescountyga.org>, <smayfield@smithwelchlaw.com>, <elections@laniercountyvoc.com>, <jacksonge@dlcga.com>, <elections@lee.ga.us>, <elections@libertycountyga.com>, <longcountyelections.csnell@gmail.com>, <elections@lowndescounty.com>, <elections@lumpkincounty.gov>, <macoboer@windstream.net>, <marioncountyelect@gmail.com>, <phyllis.brooks@thomson-mcduffie.net>

Dear Election Superintendents, Election Board Members, and Designees,

*If you are receiving this a second time, this is to cover some distribution issues from yesterday.
Sincere apologies.*

We respectfully ask that the attached letter regarding candidate qualifications and GA Title 21 undergo immediate review, as it relates to constitutional matters that may impact the citizens and candidates of your county.

Feel free to reach out if you have any questions or additional facts by replying to this email or contacting us at 803-702-0387.

Sincerely,

Susan P. Opraseuth and Sarah Thompson
Georgia Citizens
GoReclaimGA, LLC

EXHIBIT 8-2

Qualifications & GA Title 21.pdf

February 29, 2024

GoReclaimGA, LLC
 8815 Windward Parkway
 Alpharetta, GA 30005
 team@goreclaimga.org
 803-702-0387

Dear Election Superintendents, Election Board Members, and Designees,

We have every belief that you place the highest priority on the equal protection of your citizens and candidates to defend your constitutional county jurisdiction. This letter concerns your acceptance of submitted "Republican Party" designations of "a party official with whom candidates of such party for county elective office shall qualify" (O.C.G.A. § 21-2-153(c)(2)). The qualifying paperwork that you must dutifully execute on "behalf" of the "Republican Party" is additionally concerning. There are immediate matters of GA Title 21 Law largely outside the awareness of public election officials, citizenry, and candidates, addressed below.

You and your office are responsible for presenting and processing fully transparent and lawful paperwork to public candidates next week, March 4th-8th. That paperwork must be properly certified to you per O.C.G.A. § 21-2-154(a), by public actions that "prevent any fraud, deceit, or abuse" (O.C.G.A. § 21-2-70(15)). We urge you to exercise caution in your duties.

Notably, Attorney Bryan Tyson, for Secretary of the State of Georgia, recently stated in the federal trial of *Curling v. Raffensperger* on 2/1/24: "As a matter of practice counties run elections in Georgia **with assistance** from the State... You can't bind the counties through the Secretary [of State] because the **counties have their own independent legal obligations for how they conduct elections**" (U.S. District Court Official Certified Transcript pg 108-109).

There are four immediate matters of GA Title 21 Law for your consideration:

1 - The Raffensperger Administration and Kemp before him **have recognized a private corporation - the Georgia Republican Party, Inc. (GRP, Inc.) - with authority to conduct statewide party affairs in Georgia.** Rules of this GRP, Inc. appear to have taken the place of the previous Title 21 Elections Law rules, seeming to violate political party standards of O.C.G.A. § 21-2-110(f) & 111. This impacts our ballots. The candidate qualification affidavit asks for an attestation "That he or she will not knowingly violate THIS chapter or rules or regulations adopted under THIS chapter" (O.C.G.A. § 21-2-153(e)(9)). THIS chapter refers to **Chapter 2 of Title 21 of the GA Elections Code**. Instead, the "State Republican Party," missing registration documents under Title 21, is apparently operating **under Title 14 Corporate Law**.

2 - All officials of the "State Republican Party" appear currently poised as officials for the GRP, Inc. - **a corporation**. According to the GRP, Inc. Rule 1.1 & 7.6 (gagop.org), party officials include: "*Members of State Exec Committee, the State Committee, GRP employees, appointed GRP Officials, County Chairmen, members of any County Committee and members of any District Committee.*" All positions of the "Georgia Republican Party" appear to be under a separate entity named the GRP, Inc. that executes a **member prohibition** in its Articles of Incorporation, but then proceeds to solicit membership in its Rule 1.1.

3 - These county "Party Incs," are registered with the GASOS Corporations Division and appear to be acting as Title 21 Elections Law "Republican Political Party Committees." Local corporate officials may be qualifying and collecting fees from public candidates:

Barrow County	Fulton County	Muscogee County
Bartow County	Gilmer County	Newton County
Bibb County	Glynn County	Pickens County
Bulloch County	Gordon County	Pierce County
Camden County	Greene County	Putnam County
Chatham County	Gwinnett County	Rabun County
Cherokee County	Hancock County	Town County
Cobb County	Harris County	Rockdale County
Colquitt County	Heard County	Taylor County
Columbia County	Henry County	Berrien County
Crawford County	Houston County	Tift County
Dekalb County	Macon County	Union County
Dougherty County	Meriweather County	Walker County
Fannin County	Miller County	Wayne County
Fayette County	Morgan County	Whitfield County

4 - Counties not listed above without an established local "Party Inc" structure still retain officials who are acting corporately on behalf of the State GRP, Inc. The Republican corporate structure in the State of Georgia is, alarmingly, unavoidable.

Continuing historic government precedence is not a valid reason to avoid the Law. Without immediate remedy, the 2024 Candidate Qualification Paperwork for county and state candidates appears to LACK CRITICAL DISCLOSURE of potential violations of Elections Law:

To: The Chairman and Secretary of the County
Executive Committee of the _____
Party of _____ County/Municipality
State of Georgia

**DECLARATION OF CANDIDACY AND AFFIDAVIT
(COUNTY/MUNICIPALITY)**

More accurate example:

To: The Chairman and Secretary of the County Executive
Committee of *Red County Republican Party, Inc.*
and *Georgia Republican Party, Inc.*,
Duly Incorporated Under the Laws of the State of Georgia

provisions of the Georgia Election Code (O.C.G.A. § 21-2) or of the rules or regulations adopted thereunder; I will not knowingly violate the rules or regulations of the _____ party.

More accurate example:

... Provisions of GA Corporations Code... I will not knowingly violate the Rules of the Georgia Republican Party, Inc. (and possibly other Inc.) adopted under GA Title 14.

Political proponents are requiring the following oath of allegiance claiming the authority of O.C.G.A. § 21-2-153(b)(4):

I DO SWEAR OR AFFIRM MY ALLEGIANCE TO THE GEORGIA REPUBLICAN PARTY.

Print Name of Candidate: _____

Signature of Candidate: _____

Date: _____

More accurate (example):

I do swear or affirm my allegiance to the *Georgia Republican Party, Inc., a Domestic Non-Member, Nonprofit Corporation (and possibly) other local "Party Inc" such as Red County Republican Party, Inc.*

In the results of our GASOS Open Records Request #24-52, the Elections Division has directed **no disclosure of these corporations to election officials nor the candidates**, some of whom will be given no option but to knowingly or unknowingly route their fees through corporate "Party Inc." bank accounts. This is despite the remittance of GASOS ORR #23-475 and several others authorizing the GRP, Inc.:

Request the following for the State Republican Party: names, home addresses, and titles of the persons composing its governing committee and executive officers // certified copies of its charter, bylaws, rules, and regulations.

Remittance: ALL PUBLIC CORPORATE DOCUMENTS. No governing committee provided - only the names of Alex Kaufman, Caroline Jeffords, Joshua R. McKoon, and Laurie L. McClain on a corporate annual registration dated 9/15/23.

Furthermore, much of the cashflow for these corporate Republican committees may be directed through corporate bank accounts, not those of member-based political party committee associations. Candidate qualification fees may be remitted to county governments by means of corporate bank checks. Interchanging of tax identification numbers may also be occurring.

Citizens have also discovered that some of the local "Party Incs" do not even have the name of the party. For example, "Starting Over Smarter, Inc." in Gwinnett County.

In its Articles of Incorporation, the GRP, Inc. has self-identified as a FEDERAL political organization under IRS 527 Law. However, it neglects the mandate that political organizations in GA consist of all political parties and political bodies officially structured and registered under Article 3, Chapter 2 of Title 21 Elections Law and per O.C.G.A. § 21-2-2.

Basic democracy matters in Georgia. Title 14 corporate documents and rules appear to have no authorized power over political party officials, committees, election affairs, and conventions mandated exclusively by Title 21 of the Georgia Elections Code.

The following statutes appear to be relevant to these quandaries: Public election officials have the power and responsibility to get needed answers under O.C.G.A. § 21-2-560. **Consequences regarding duty failures of public officers** or any officer of a political party is in O.C.G.A. 21-2-596. Enabling false statements and false pathways may intersect O.C.G.A. § 21-2-563 & 603. Titles 45 & 16 are also likely engaged regarding public documents.

Our candidates are constitutionally protected. They may be unknowingly subjected to signing Affidavits to a corporation and not to a lawful political party. Facilitating a candidate pathway through a corporate entity not in compliance with Title 21 Elections Law may nullify the candidate qualification procedures and paperwork. Does it appear to you that corporate pathways to ballot access may invalidate the ballot?

If compelled to dutifully inquire about these documented conditions that may be unequally protecting the citizens of your county and impacting your responsibilities we encourage you to reach out to the Elections Division of the Georgia Secretary of State immediately to determine if you can receive anything other than corporate documents.

Please feel free to contact us with any questions or corrections to this information.

Very respectfully,

Susan P. Opraseuth
Susan P. Opraseuth (Fulton County)

Sarah Thompson
Sarah Thompson (Bulloch County)

Our Project Website: goreclaimga.org/home/

Portions of the GRP, Inc. Corporate Documents Remitted within GASOS ORR #23-475 :

**RULES OF THE
GEORGIA
REPUBLICAN PARTY,
INC.**

I hereby certify that the attached is a true and correct copy of the Rules of the Georgia Republican Party, Inc. as adopted on June 17, 2014.

David Shafiq, Chairman
Georgia Republican Party, Inc.

Secretary of State
Control No: 14013271
Date Filed: 2/10/2014 9:40:48 AM

Articles of Incorporation

The Name of the Corporation:
Georgia Republican Party, Inc.

The corporation is organized pursuant to the Georgia Nonprofit Corpe

The Principal Place of Business:
P.O. Box 550008
Atlanta, Georgia 30355

Registered Agent's Name and Address:
Anne W Lewis
1170 Peachtree St NE
Ste 2200
Atlanta, Georgia 30309-7200, Fulton County

Effective Date: February 07, 2014

Optional Provisions:



The Coproration will not have members.

1.1 QUALIFICATIONS FOR PARTICIPATION IN PARTY ACTIONS

All electors¹ who are in accord with the principles of the Republican Party, believe in its declaration of policy and are in agreement with its aims and purposes may participate as members of the Georgia Republican Party, Inc. (hereinafter "GRP") in its conventions or precinct caucuses. All chairmen² and members of committees, delegates to conventions and voters in precinct caucuses, provided for in these Rules, shall be members of the GRP and must

Qualification FEES and Title 21

Sarah Thompson <goreclaimgeorgia@gmail.com>

Mon, Mar 11 at 11:45 PM

Bcc: <egale@mcintoshcounty-ga.gov>, <maddox.denise2@gmail.com>, <vaughn.gable@haralsoncountyga.gov>, <bschreiner@buttscounty.org>, <elections@co.newton.ga.us>, <ymack@hallcounty.org>, <voterreg@dekalbcountga.gov>, <darin.mccoy@evanscounty.org>, <csnell@longcountyga.gov>, <deidre.holden@paulding.gov>, <jphillips@trc-lawfirm.com>, <shonda@applingco.com>, <lellison@habershamga.com>, <jwinter@turnercountygeorgia.com>, <cbaxter@madisonco.us>, <lbolton@lincolncountyga.com>, <atcoelections@hotmail.com>, <arussell@baconcounty.org>, Carla Heard <bd.elect@bakercountyga.com>, <baldwinprobate@yahoo.com>, <registrars@co.banks.ga.us>, <mfranklin@barrowga.org>, <kirkj@bartowcountyga.gov>, <electionsbenhill@aol.com>, <belections@windstream.net>, <tgillon@maconbibb.us>, <jfordham@bleckley.org>, <bcelections@btconline.net>, <brookscoelections@windstream.net>, <cindyreynolds@bryan-county.org>, <burkereg@burkecounty-ga.gov>, <projudgeholder@windstream.net>, <ddfelix@co.camden.ga.us>, <candlerprobate@gmail.com>, <elections@carrollcountyga.com>, <catoosaelections@catoosa.com>, <bhodes@charltoncountyga.gov>, <biwooten@chathamcounty.org>, <jonigoodwin@yahoo.com>, <chattoogaelections@hotmail.com>, <voterhelp@cherokeega.com>, <charlotte.seosebee@accgov.com>, <clayprobatejudge@gmail.com>, <elections@claytoncountyga.gov>, <clinchelections@clinchcountyga.gov>, <ElectionsInfo@cobbcounty.org>, <rachel.roberts@coffeecounty-ga.gov>, <ngay@columbiacountyga.gov>, <cookelections@windstream.net>, <agay@coweta.ga.us>, <b.peacock@crawfordcountyga.org>, <elections@crispcounty.com>, <tvaughan@dadecounty-ga.gov>, <gferguson@dawsoncounty.org>, <elections@decaturcountyga.gov>, <al.mccranie@yahoo.com>, <dooly.county.elections@gmail.com>, <docovoterregelections@dougherty.ga.us>, <bdofelections@co.douglas.ga.us>, <elections@earlycounty.org>, <judgerodgers@planttel.net>, <boe@effinghamcounty.org>, <kcurry@emanuelco-ga.gov>, <elections@fannincountyga.org>, <electionsgroup@fayettecountyga.gov>, <voter@forsythco.com>, <tcreason@franklincountyga.gov>, <elections.voterregistration@fultoncountyga.gov>, <gilmerelections@elijay.com>, <probate@glascockcountyga.com>, <glynnelections@glynncounty-ga.gov>, <shicks@gordoncounty.org>, Kathleen Coine Mayers <ckathleen@greenecountyga.gov>, <voterregistration@gwinnettcounty.com>, <elections@hallcounty.org>, <boer@hancockcountyga.gov>, <sjarrett@harriscountyga.gov>, <registrar@hartcountyga.org>, <tadams@heardcountyga.com>, <aypitts@co.henry.ga.us>, <elections@houstoncountyga.org>, <electionsirwincounty@aol.com>, Jennifer E. Logan <jelogan@jacksoncountygov.com>, <jasperprobate@bellsouth.net>, <jeffdaviseselections@gmail.com>, <sgray@jeffersoncountyga.gov>, <probate8@gmail.com>, <ckillingsworth@johnsonco.org>, <marion.hatton@jonescountyga.org>, <smayfield@smithwelchlaw.com>, <elections@laniercountybo.com>, <jacksonge@dlcga.com>, <elections@lee.ga.us>, <elections@libertycountyga.com>, <longcountyelections.csnell@gmail.com>, <elections@lowndescounty.com>, <elections@lumpkincounty.gov>, <macoboer@windstream.net>, <marioncountyelect@gmail.com>, <phyllis.brooks@thomson-mcduffie.net>, <elections@bullochcounty.net>, <sjones@bullochcounty.net>

Dear Election Superintendents, Election Board Members, and Designees,

Sincere thanks for your recent remittance of records regarding any "party officials" qualifying Republicans in your county. Also, your overwhelmingly positive feedback on our February 29th letter has inspired hope across Georgia that our counties have courageous, ethical election officials on duty for such a time as this.

The attached letter contains immediate concerns regarding the processing and paying of fees for the qualification of Republican candidates. Those counties that qualified candidates on behalf of the "Republican Political Party," will you write checks to the Georgia Republican Party, Inc. as state and federal candidates were directed to do?

Very respectfully,

Susan P. Opraseuth
Susan P. Opraseuth (Fulton County)

Sarah Thompson

Sarah Thompson (Bulloch County)

EXHIBIT 9-2

Project Website: goreclaimga.org/home/



Sender notified by
Mailtrack

Qual Fee Routing - GRG.pdf

March 11, 2024

GoReclaimGA, LLC
 8815 Windward Parkway
 Alpharetta, GA 30005
team@goreclaimga.org, goreclaimgeorgia@gmail.com
 803-702-0387

Dear Election Superintendents, Election Board Members, and Designees,

Sincere thanks for your recent remittance of records regarding any “party officials” qualifying Republicans in your county. Also, your overwhelmingly positive feedback on our February 29th letter has inspired hope across Georgia that our counties have courageous, ethical election officials on duty for such a time as this.

We hope you will reject any continual participation in state actions that negatively impact the constitutional rights of your citizens. And, that you would, instead, vigilantly proceed to defend your county per the strict and clear provisions of GA Election Code.

With emphasis, the Georgia Secretary of State Administrations of Brian Kemp and Brad Raffensperger **have recognized a GA Title 14 private corporation, the Georgia Republican Party, Inc. (GRP, Inc.), with authority to exercise total statewide control over party affairs in Georgia.** Counties with or without an additional county-level “Party Inc.” structure still retain officials who are acting **corporately on behalf of the State GRP, Inc. and its Corporate Bylaws (Rules).**¹ **The Republican corporate structure in the State of Georgia is, alarmingly, unavoidable to voters, candidates, and election officials.**

BIG PICTURE: All rules for political parties must be adopted under Chapter 2 of Title 21 per GA Code 21-2-153(e)(9). There appear to be no such rules included in any current state political party registration for the “Republican Party” with the GASOS. There is no known state governing committee filed, which should be 178 elected members. This impacts your ability to currently accept documents of any sort from a “Republican” entity per GA Code 21-2-154. There is no known provision of Law authorizing CORPORATE ENTITIES and CORPORATE DOCUMENTS for a political party. GA Code 21-2-154 requires:

¹ All officials of the “State Republican Party” appear currently poised as officials for the GRP, Inc. - **a private corporation.** According to GRP, Inc. Rule 1.1 & 7.6 (gaqop.org), party officials include: “*Members of State Exec Committee, the State Committee, GRP employees, appointed GRP Officials, County Chairmen, members of any County Committee and members of any District Committee.*” All positions of the “Georgia Republican Party” appear to be under a separate entity named the GRP, Inc. that executes a member prohibition in its Articles of Incorporation, but then proceeds to solicit membership in the GRP, Inc. in its Corporate Rule 1.1.

*Such certification [of political party candidates] **shall not be accepted** if the political party **has not registered with the Secretary of State as required in Article 3 of this chapter.** [Chapter 2 of Title 21]*

A very recent **March 8th, 2024 Court Order** regarding four election qualification cases² in the Catoosa County Superior Court affirms our assertion of the primacy of GA Title 21 and Article 2 of the GA Constitution over ALL political party affairs in the State of Georgia. Election officials in Georgia counties must strictly construe³ requirements for political party affairs under ONLY Title 21.

Last week, in **Columbia County**, the 15th largest in Georgia, **the Republican Chairman ethically forfeited any involvement in qualifications** because of the corporate obligations on him as an "official" of the GRP, Inc. and because of entanglements with the Columbia County Republican Party, Inc. This gentleman appears to have done so to protect the candidates, the Rule of Law, and both the U.S. and GA Constitutions. He should be commended.

We believe that similar lawful decisions should also have occurred statewide with denial of designations by both election officials and law-abiding Republicans. Election Law mandates that county rules be consistent with rules of the state governing committee (GA Code 21-2-111(c)) for proper oversight and compliance. We believe that all designations should have been denied⁴ due to unlawful practice of allowing party affairs to be under the state parent "Georgia Republican Party, Inc." The GRP, Inc. is a private, non-member, like-named corporation under Title 14 Nonprofit Corporate Law.

REGARDING FEES:

***If you facilitated the qualification of candidates through corporate "party officials."** which include "County Chairmen" and "members of any County Committee," you can apparently expect a corporately "tied" check for 50 percent of the fees that they collected per GA Code 21-2-131(c)(1).*

***If you accepted fees on behalf** of what you believe to be a compliant Republican political party, regardless of how long you have done so, we respectfully direct your attention to GA Code 21-2-131(c)(3)(B), which states:*

² Catoosa County Clerk of Court SUCV20244000205, SUV2024400208, SUCV2024400211, SUCV2024000213 - Order of Judge Don W. Thompson, Judge of Superior Court, Lookout Mountain Judicial Circuit.

³ "The election law is in derogation of the common law and must be strictly construed." Schloth v. Smith, 134 Ga. App. 529, 215 S.E. 2d 292 (1975).

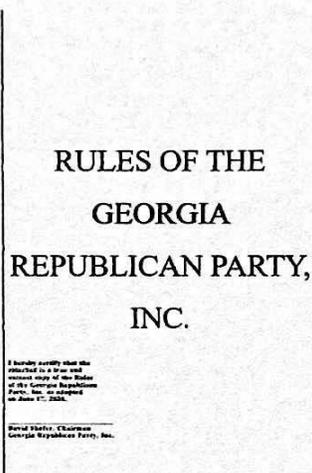
⁴ Justice Charlie Bethel of the GA Supreme Court has recently reminded Georgians: For a government entity whose authority on the relevant point is purely a creature of statute, the absence of statutory authority is the absence of legal authority to act. Camp v. Williams, 314 Ga. 699, 704, 879 S.E.2d 88, 92 (2022).

... 25 percent shall be transmitted to the state executive committee of the appropriate political party and 75 percent shall be retained by the superintendent of the county.

Below, in Attachment A, is a February 22, 2024 letter sent to the Camden County Elections Office by Joshua R. McKoon, the so-called "Chairman" of the "Georgia Republican Party." Yet, the party has no known assets, except for maybe a circular logo they place at the top of the page. Mr. McKoon is listed with the State Corporations Division (sos.ga.gov) as CEO of the like-named private "GAGOP" corporation "Georgia Republican Party, Inc."⁵ with assets. He states:

*"... there is **no other Republican** group, party, individual or **entity** that has the authority to qualify candidates to run for office, per the Rules of the Georgia Republican Party."*

What about the Corporate Rules of the Georgia Republican Party, Inc. under which he was apparently elected?



The Camden letter makes no mention of the "Georgia Republican Party, Inc." which is the GA Title 14 ruled⁶ and regulated corporation acting as the "State Republican Party." The text box at the bottom of the letter, however, clearly indicates that McKoon's letter was **"Paid for by the Georgia Republican Party, Inc."**

Under the authority of Mr. McKoon, Executive Director Travis Bowden, had also previously issued a February 14, 2024 Memorandum (Attachment B) directing that all fees for state and federal candidates **be written to the Georgia Republican Party, Inc., a private corporate entity.** Further, it asserts that

⁵ <https://ecorp.sos.ga.gov/BusinessSearch>

⁶

<https://gagop.org/wp-content/uploads/2021/04/Georgia-Republican-Party-Inc.-Rules-As-Adopted-June-17-2020-BJVV-er3.pdf>

qualifying is through the “GAGOP,” which is used as a corporate moniker at this time (Attachment C)⁷. The directive of the memorandum seems inconsistent with the directive of the Camden County letter.

Excerpts from the Memorandum⁸:

your Government Issued Photo ID for verification. You must also bring the qualifying fee in the form of a money order, a cashier’s check, your campaign check, or your personal check made payable the “Georgia Republican Party, Inc.” We cannot accept cash payments. **We urge you to pay by money order or certified check because if a**

Make Checks Payable to:

**Georgia Republican Party, Inc.
P.O. Box 550008
Atlanta, GA 30355**

Based on the Memorandum from Executive Director Bowden, it appears that you, the county election superintendent, must also disburse your 25 percent fee-split payment to the Georgia Republican Party, Inc. Confirmation of this is incumbent upon you.

Next, the guidance from the Republican apparatus appears to directly contradict the official state public notice for *Federal and State Qualifying Locations* (Attachment D).⁹ It clearly states: “payable to the Georgia Republican Party,” which is the formerly used member party entity that is not a known receiver of funds at this time.

Republican Party

206 Washington Street, Atlanta, GA 30334
State Capitol Building, Room 216

What should I bring?

- Valid Photo ID
- Completed Declaration of Candidacy & Affidavit (recommended)
- Qualifying fee payable to Georgia Republican Party

⁷ Fulton County Superior Court 2021CV354612. Order of Senior Judge Alford J. Dempsey, Jr. of Fulton County Superior Court, Atlanta Judicial Circuit.

⁸ <https://gagop.org/wp-content/uploads/2024/02/Re-Updated.pdf>

⁹

<https://sos.ga.gov/sites/default/files/2024-03/Federal%20and%20State%20Candidate%20Qualifying%20Locations.V3.pdf>

However, at qualifiers in Room 216 of the Atlanta Capitol, many candidates were told to write their checks to the "Georgia Republican Party." They were then, alarmingly, given documents stating that their "2024 Qualifying Fee Payment Information" was "**Paid for by the Georgia Republican Party, Inc.**" (Attachment E).

Finally, we urge you to be extremely cautious considering any potential repercussions and/or potential personal liability that you may incur by filing these documents into the public record.¹⁰ The problematic qualification documents include: a) Declarations of Candidacy and Affidavits, b) notarized attestations or affirmations of allegiance to a "political party," and c) fees entangled with corporation(s). However, GA Code 21-2-153(b)(1-4) and GA Code 21-2-131 mandates that all of these items be handled by or on behalf of lawfully registered, official state and local political party committees and officials.

We are sincerely concerned with the constitutional, civil rights, and/or voting implications of a private corporation appearing to interfere with our elections. This culminates with its requiring candidates to notarize affirmations or attestations of allegiance to what they claim is the "Georgia Republican Party." Any cloaked corporate agreements or contracts are not in Georgia's interest.

If compelled to dutifully inquire about these documented conditions that may be unequally protecting the citizens of your county and impacting your responsibilities under GA Code 21-2-70(13)(15), we encourage you to reach out to the Elections Division of the Georgia Secretary of State immediately.

This will also ensure that the "pay to" entity that you provide to your county bursar complies with Georgia Election Law 21-2-131 mandating a "pay to" entity that must be a member and committee-based political party per GA Code 21-2-111(a,b). This is entirely different from a non-member private corporation with a board of directors. Political parties and corporations do not appear to have any lawful way to "merge" under GA Law.

Please feel free to contact us with any questions or corrections to this information.

Very respectfully,

Susan P. Opraseuth
Susan P. Opraseuth (Fulton County)

Sarah Thompson
Sarah Thompson (Bulloch County)

Project Website: goreclaimga.org/home/

¹⁰ GA Code 16-10-20 and 16-20-20.1

ATTACHMENT B:

MEMORANDUM

To: All Republican Candidates for State and Federal Offices
From: Travis Bowden, Executive Director
Date: February 14, 2024
Re: State and Federal Candidate Qualifying March 4th – 8th

REVISED UPDATE 2/20/24:

It has been brought to our attention by the Secretary of States office that the new qualifying software will not print out a Declaration of Candidacy and Affidavit. To prevent longer than normal lines and speed up the process, we ask each Candidate wishing to qualify to bring a completed and typed out Declaration of Candidacy and Affidavit when you arrive to qualify. So that all the forms are legible, we ask that you to use the online editable pdf version. Please make sure you click on the correct form below – Thank you.

[Federal Candidates Click Here](#)

[State Candidates Click Here](#)

Republican candidate qualifying for state and federal offices will be held beginning at 9:00 a.m. on Monday, March 4, 2024 and continuing until noon on Friday, March 8, 2024 in the State Capitol.

This memo lists important things that you need to know about the qualifying procedures for state and federal office. This memo is intended merely to be a helpful reference guide, not an exhaustive summary of state law or the Party's rules. Each candidate is responsible for ensuring that he or she knows the applicable laws and rules for eligibility, qualifying, and holding public office.

Here are some instructions that will make qualifying a smooth process for you and the Party qualifying officials:

1. In accordance with state law, all state and federal candidates for a political party's nomination will qualify in the State Capitol. Qualifying for Republican candidates for state and federal office will take place in Room 216 of the State Capitol. Republican candidates for state or federal offices will not be qualified at any other location.
2. Qualifying begins at 9:00 a.m. on Monday, March 4 and ends at NOON on Friday, March 8. Daily operating hours will be 9:00 a.m. until 5:00 p.m. on Monday-Thursday. On Friday, qualifying begins at 9:00 a.m. and ends promptly at 12noon. In accordance with state law, no exceptions can be made, even for candidates who are only a minute late. In order to avoid any last minute problems, please make every effort to qualify before Friday.

3. If you intend to have an appointed agent complete the qualification process on your behalf, please notify Travis Bowden at the GAGOP at travis@gagop.org prior to qualifying week. If qualifying by an agent, the agent must come to qualifying in person and must bring (a) a properly completed Declaration of Candidacy and Affidavit, which has been signed by you before a notary public and is notarized, (b) the Republican Oath of Allegiance required by Party Rules, which has also been signed by you before a notary public and is notarized, and (c) the qualifying fee in the form of a money order, a cashier's check, your campaign check, or your personal check made payable to "Georgia Republican Party, Inc." If the affidavit and oath are not fully completed, not signed, not notarized or not dated by you or the agent is unable to pay the fee by money order, cashier's check, your personal check, or a campaign check, the Party cannot qualify you, so be sure your agent has the required, completed documents and payment in the correct amount and form. **We urge you to pay by money order or certified check because if a check is returned, you will be disqualified.**

4. If you plan to qualify in person (not through an agent), it is not necessary to complete the Declaration of Candidacy and Affidavit or Republican Oath of Allegiance in advance. Instead, when you arrive at the Capitol to qualify, all required information will be collected from you and the affidavit will be completed electronically and printed for you to sign before a notary; the Party will provide the notary. At the bottom of this memo, you will find a list of all the information you will need in order to qualify. The oath will also be printed and ready for you to sign before the notary. You will be asked to present your Government Issued Photo ID for verification. You must also bring the qualifying fee in the form of a money order, a cashier's check, your campaign check, or your personal check made payable the "Georgia Republican Party, Inc." We cannot accept cash payments. We urge you to pay by money order or certified check because if a check is returned, you will be disqualified. If you come to the Capitol prepared with the required information and your payment, the process will be quick, easy, and efficient. If the affidavit and oath are not fully completed, not signed, not notarized, or not dated by you or you are unable to pay the fee by one of the forms of payment listed above, the Party cannot qualify you.

5. Please refer to the fee schedule for the amount of the qualifying fee for the particular state or federal office you are seeking.

For those qualifying in person, please come prepared with the following information:

- **A Government issued Photo ID**
 - Full Name (your last name must match the last name on your voter registration)
- How you want your name is to appear on the ballot – see the attached rule of the State Election Board regarding the appearance of the name on the ballot
- **Residence Address** (your street address – not a PO Box, although you may also list a PO Box if it is your mailing address)
- **Precinct Name** (as it appears on your voter card) **NOTE: Make sure your precinct has**

not changed. Many counties have redrawn precincts and the correct precinct name must be specified on the qualifying form.

- Profession, business or occupation, if any
- Number of years you have resided in Georgia
- Number of years you have lived in your county
- Number of years you have lived in your district

In addition, if you wish to designate an email address, web site and/or a P.O. Box address or separate address for public posting on the Secretary of State's website list of candidates, please have that information ready at the time you qualify.

If you have any questions, please contact Travis Bowden at the State Party at travis@gagop.org.

You may also call the Elections Division of the Office of the Secretary of State at (404) 656-2871 or visit www.sos.ga.gov/elections.

The Secretary of State's office has published a helpful qualifying information and forms which you can find at <https://sos.ga.gov/candidate-qualifying-elected-office>

**QUALIFYING FEES FOR
STATE AND FEDERAL CANDIDATES
FOR 2024 ELECTIONS IN GEORGIA**

Office Qualifying Fee

- United States Representative \$ 5,220.00**
- State Senator \$ 400.00**
- State Representative \$ 400.00**
- Justice of the Supreme Court \$ 5,583.36**
- Court of Appeals Judges \$ 5,549.70**
- Superior Court Judges \$ 4,073.71**
- District Attorney \$ 3,884.19**

Make Checks Payable to:

**Georgia Republican Party, Inc.
P.O. Box 550008
Atlanta, GA 30355**

ATTACHMENT C:

Fulton County Superior Court
 EFILEDAC
 Date: 9/29/2023 2:34 PM
 Che Alexander, Clerk

IN THE SUPERIOR COURT OF FULTON COUNTY
 STATE OF GEORGIA

JOHN L. PADGETT

Plaintiff,

v.

GEORGIA REPUBLICAN PARTY, INC

Defendant.

CIVIL ACTION FILE

NO. 2021CV354612

ORDER GRANTING SUMMARY JUDGMENT

This matter came before the Court on the Georgia Republican Party, Inc's (the "GAGOP") Motion for Summary Judgment. The Court heard oral arguments on August 22, 2023. Upon review of all the evidence presented, consideration of the oral arguments presented by counsel for each of the Parties, and review of the entire record of the case, the Court, for the reasons set forth below, hereby GRANTS the GAGOP's *Motion for Summary Judgment* in support of its counterclaim for breach of fiduciary duties against John L. Padgett ("Mr. Padgett").

FINDINGS OF FACT

The Court makes the following findings of fact and conclusions of law. Mr. Padgett was elected Chairman of the Georgia Republican Party in 2013. At the time of Mr. Padgett's election as Chairman, the public records of the Secretary of State reflect that the GAGOP was an unincorporated entity. On February 3, 2014, Mr. Padgett's personal executive assistant, Qiana Keith ("Ms. Keith") complained to her supervisor about the treatment she received, citing racial discrimination and offensive treatment she had allegedly endured while working under Mr. Padgett's administration (the "Racial Allegations"). Seven days after the "Racial Allegations," public records reflect that Mr. Padgett incorporated the GAGOP. Upon incorporating the GAGOP, Mr. Padgett also became the GAGOP's CEO and CFO.

ATTACHMENT D:

**Office of the Secretary of State
Elections Division**



Federal and State Candidate Qualifying Locations

POLITICAL PARTY CANDIDATES

Democratic Party

206 Washington Street, Atlanta, GA 30334
State Capitol Building, Room 230

What should I bring?

- Valid Photo ID
- Completed Declaration of Candidacy & Affidavit (recommended)
- Qualifying fee payable to Democratic Party of Georgia

Republican Party

206 Washington Street, Atlanta, GA 30334
State Capitol Building, Room 216

What should I bring?

- Valid Photo ID
- Completed Declaration of Candidacy & Affidavit (recommended)
- Qualifying fee payable to Georgia Republican Party

Money Order or Certified, Campaign, or Personal Check. No cash or credit/debit card payments accepted.

(Public entrance on Mitchell Street)

NONPARTISAN OFFICE CANDIDATES

Elections Division

Plaza Level
2 Martin Luther King Jr. Drive SE
Atlanta, GA 30334

Professional Licensing Board

237 Coliseum Drive
Macon, GA 31217

South Georgia Office

238 East Second Street
Tifton, GA 31794

POLITICAL BODY CANDIDATES ONLY

Elections Division

Plaza Level
2 Martin Luther King Jr. Drive SE
Atlanta, GA 30334

Dates and time for qualifying:

Monday, March 4, 2024	9:00 am to 5:00 pm
Tuesday, March 5, 2024	8:00 am to 5:00 pm
Wednesday, March 6, 2024	8:00 am to 5:00 pm
Thursday, March 7, 2024	8:00 am to 5:00 pm
Friday, March 8, 2024	8:00 am to 12:00 pm

Nonpartisan, Independent, and Political Body Candidates should bring:

- Valid Photo ID
- Completed Notice of Candidacy & Affidavit (recommended)
- Qualifying fee payable to Georgia Secretary of State

Money Order or Certified, Campaign, or Personal Check. No cash or credit/debit card payments accepted.

Elections Division

2 MLK Jr. Drive, Suite 802, Floyd West Tower | Atlanta, Georgia 30334

Phone: (404) 656-2871 | Email: Elections@sos.ga.gov

ATTACHMENT E:



2024 Qualifying Fee Payment Information

*Please provide the following information for reporting purposes to the FEC & State Ethics.
We will not share the information below:*

Only the Georgia Republican Party Inc. Title 14 corporation reports income to the FEC & State Ethics.

Those acting as agents for qualifying fee payments for the Georgia Republican Party, Inc. verbally asked many candidates at State Qualifiers to write checks to the Title 21 "Georgia Republican Party."

It appears that there is an arrangement with Synovus Bank to accept checks written to both entities into the corporate account or some other deposit scheme that is unclear to the public.

Per FEC reports, accounts for the Georgia Republican Party, Inc. are held at Synovus Bank, Roswell, GA.

**Paid for by the Georgia Republican Party, Inc.
Not authorized by any candidate or candidate's committee.
Post Office Box 550008 - Atlanta, Georgia 30355
404.257.5558 - WWW.GAROP.ORG - 404.257.0779 (FAX)
Joshua R. McKeon, Chairman - Laurie L. McClain, Treasurer**