CALL for empanelment of an Investigative Committee

A charge and allegation is hereby brought **against Adam Khan** for violations of the Washoe County Republican Central Committee (WCRCC) Bylaws and Roberts Rules of Order and other causes. Some of these charges are delineated by members of the Central Committee (CC) in the action that removed khan from the Chairmanship of the CC on March 24th, 2016. An additional particularly egregious charge is Adam Khan's refusal to step down from the position of the Chair after he was removed and his fraudulent representation that he was still Chair to hundreds of new CC members at the Convention and to the Press during this period of high exposure of the Party to the media.

It would appear that Khan has refused to honor the will of the CC in regard to his removal from Office in an effort to advance his political ambitions of a Candidate for a position on the Sparks City Council. Khan has ignored the lawful vote and decision of a properly called meeting of the CC on March 24th, 2016. That meeting was properly noticed by the Party Secretary, Barbara Hawn, with Khan's knowledge and consent. Khan's refusal to acknowledge his removal very adversely affected the ability of the CC to heal its wounds and move forward in unity in this very important Presidential election year with hundreds of newly elected members just coming on board.

If Adam Khan continues to ignore his lawful removal from Office and attempts to Chair the Executive Committee meeting on April 14th and/or to Chair the next CC meeting on April 26th it will just add to the cause for his removal from the CC and further divide and exacerbate the efforts to heal the Party organization from the past transgressions of Khan and the three other resigned officers who were cited for wrongdoings in the recent Investigative Committee report.

we believe that the sum cumulative warrant his removal from the CC for a mini		of all these transgressions and violations by Kha of four years.
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CALL for empanelment of Investigative Committee

A charge and allegation is hereby brought **against Barbara Hawn**, and other conspiratorial persons yet unknown, for violations of State law and/or of the Washoe County Republican Central Committee (WCRCC) Bylaws and Roberts Rules of Order in unilaterally without authority withholding and/or removing Gary Schmidt's name from the rolls of the newly elected Central Committee (CC) members at the Convention on April 2nd, 2016. It would appear that she, and/or persons unknown, actually removed Mr. Schmidt's name from the CC membership rolls based solely on a new Bylaw (ARTICLE III MEMBERSHIP Section 3. D.) that had not yet been brought before the Convention, let alone adopted.

If Barbara Hawn (or others) felt that there was cause or even a mandate to remove Mr. Schmidt from the CC based upon the passage of that new Bylaw or subsequent to its passage, the proper process and procedure would be to bring charges before the Executive Committee or the CC, as is being done here against her, and demand an Investigative Committee be empanelled to investigate and to report findings and recommendations to the body of the Central Committee for consideration and possible action. There is a process that is due under the Bylaws/Roberts Rules!!

Barbara Hawn's actions in this matter of ignoring the process that is due and on her own (or in conspiracy with others) just removing Schmidt's name from the new CC roster is particularly egregious in that its not the first such abusive act of this nature she has perpetrated against Mr. Schmidt. She was one of twelve co-conspirators who last year attempted to remove Mr. Schmidt from the CC in total disregard and in violation of the Bylaws/Roberts Rules. A previous Investigative Committee cited and condemned her and the other eleven persons for the previous attempt to remove Schmidt from the CC without going through the process that is due.

warrant Hawn's removal from the CC and be the CC for a lesser time period and/or censor transgressions in this matter. A new Invest and report to work from as well as two parl	cts, now repeated twice within a twelve month period, panishment for at least a four year period. Removal from sorship may be appropriate for others committing lesser tigative Committee will have the previous investigation liamentarian opinions on the subject that have now	
been adopted by the CC.		
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CALL for empanelment of Investigative Committee

A charge and allegation is hereby brought **against Phyllis Westrup**, and other conspiratorial persons yet unknown, for obstructing and/or denying access to and/or participation in the Washoe County Republican Convention held on April 2nd, 2016 and also for mishandled and/or doctoring documentation regarding nominees for the new term of the CC in an effort to prevent certain persons from CC membership. It is herby alleged that they did so through actions and lack of action via their positions on the Credentials Committee which Westrup Chaired and though administrative misdoings in working in the Office with the documents received from the Precinct/Caucus meetings. The Credentials Committee was also an illegal "outlaw" committee in that it was not impaneled 90 days in advance of the Convention as is required by the Bylaws and the Committee held closed secret unnoticed meetings in violation of the Bylaws and Roberts Rules of Order including at the Convention itself.

A charge is hereby made that Phyllis Westrup and others targeted specific persons because of their positions on issues that were contrary to their own for obstruction and/or denial of access and/or the right to participate in the County Convention and/or from rightful membership in the CC. They did so intentionally and in grievous violation of State law and the CC Bylaws and policies and procedures. NRS 293 provides that Delegates to the County Convention shall be elected at the Precinct/Caucus meetings. Particularly egregious was the denial of access to the Convention as Delegates for over a four hour period of Gary Schmidt and his wife, Sharon Anderson. This was done during the time period that an action was being considered specifically targeting Gary Schmidt for removal from the CC.

It is also alleged and believed that Westrup was motivated in her egregious acts against Schmidt as retaliation for the findings of a recent Investigative Committee report that cited her for hostile and punitive actions against Schmidt in a previous attempt to illegally remove Schmidt from the CC. It is alleged that the underlining hostility for Schmidt is based upon the fact that Schmidt has been a vocal critic about failings of Westrup and other Officials and Officers of the CC to comply with the Rules of Order of the CC. Many of the other Delegates that were denied proper timely access to the Convention held the same beliefs as Schmidt and were similarly critical.

We believe that these acts and omiss		•			•	•	
matter warrants her removal from the Centi	ral Co	mmittee	for a pe	eriod of a	a minimu	m of one ye	ar
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CALL for empanelment of Investigative Committee

A charge and allegation is hereby brought **against Donald Drake** and other conspiratorial persons yet unknown for perpetrating a fraud on the CC by convening and conducting unauthorized meetings of an "outlaw" alleged Bylaws Committee prior to (and/or at the) Washoe County Republican Convention held on April 2nd, 2016. They did so through actions and lack of action via their alleged positions on said "outlaw" Committee.

No Bylaws Committee is authorized in the CC Bylaws for the Convention. While the Convention could create a Bylaws Committee for the Convention by Motion and Adoption at the Convention, no motion or adoption ever occurred. Further, it is hereby alleged that the "outlaw" Bylaws Committee conducted all their meetings and constructed their "illegal" recommendations prior to the Convention.

The CC has an authorized Bylaws Committee that has been properly empanelled that was ignored and circumvented by the "outlaw" Committee in violation of the Bylaws. The duly authorized Bylaws Committee of the CC is chaired by Carole Fineberg who made objections, which were ignored, in regard to the "outlaw" Committee when she became aware of it just prior to the Convention.

It is alleged that the "outlaw" Committee also met in closed secret meetings without notice to the general membership and prepared an unauthorized report with recommendations to the Convention in total violation the Rules of Order of the CC and/or the Convention.

varrants her removal from the Central Committee for a period of a minimum of one year.					

To the Office of the Nevada Secretary of State Election Fraud Division

I was one of 14 Republican Party members elected as a Delegate to the County Convention at the Caucus Meeting for precinct number 8236 on February 23rd, 2016, in Washoe County. There were 14 Delegate seats available and 14 persons elected as Delegates which also included my husband, Gary Schmidt. Gary had been elected to Chair the meeting as he had also been so elected two years prior.

At the County Convention held on April 2nd, 2016, I was denied my status as a lawful Delegate for over one half of the Convention. During that time period that I was denied participation in the Convention a new Bylaw was allegedly adopted a copy of which is attached. I was not allowed to speak on that Bylaw proposal or to vote on it. I was fervently opposed to it. It was targeted directly at my husband, Gary Schmidt. I was denied my right to participate at that time, I believe, substantially by Phyllis Westrup the alleged Chair of the Credentials Committee (which was illegally impaneled). I believe she targeted both myself as well as my husband because of her vocally expressed animosity and hostility towards my husband.

My husband, Gary Schmidt. was also denied his Delegate status at that time and denied his opportunity to participate during that time period. Phyllis Westrup had previous been determined to be in substantial violation of Bylaws/Roberts Rules and cited by a Central Committee Investigative Committee (along with others) for a previous "illegal" (in violation of the Bylaws) attempt to remove my husband from the CC.

The Bylaw, adopted by a very narrow margin at the Convention, was a punitive action directed solely at my husband and (if not invalidated by Court action) could in essence remove and ban my husband for life from the Central Committee.

Many other Delegates that were opposed to the adoption of that Bylaw, I believe, were also denied their lawful Delegate status during the time period that that Bylaw was being considered and was ultimately adopted by a narrow margin. Since it is inherently obvious by its content that that Bylaw was punitive in nature and directly solely at my husband, it should also be noted that several another CC members and Delegates, that had been cited for an illegal attempt previously to remove my husband from the CC, were "counters" on the vote on that Bylaw proposal. They obviously should have not been permitted to participate in that capacity because of a conflict of interest.

I believe that a conspiracy and a form of election fraud has been committed by denying myself and others our rightful positions and status as participating Delegates during the consideration of that Bylaw adoption during the first half of the Convention.

I believe that that Bylaw adopted should be vacated and that criminal charges for conspiracy to commit election fraud should be considered.

From this point further I will be represented by legal council in this matter. Please direct any further written communications to the Kozak Law Firm at 3100 Mill Street, Suite 115, Reno Nevada 89502. No phones calls please; emails or written communications only! Legal counsel has been instructed to maintain a strict "paper trail" and file in this serious matter .

Sharon Anderson

CC Chuck Kozak, Attorney at Law Nevada State Republican Party National Republican Party Donald Trump Campaign Dirty Tricks Committee

Office of the Nevada State Attorney General Associated Press and All Affiliates Start of a sec of state complaint

All the training sessions presented by Phyllis Westrup prior to the Precinct/Caucus meetings indicated that the number of "nominees" for Central Committee membership allowed to move forward for "election" at the County Convention was LIMITED to the number of a actual positions of CC member available in each Precinct. Persons were told that if more persons wished to be nominated than there were CC positions available, there would have to be an "election" at the Precinct Meeting to reduce the number of "nominees" down to the number of CC positions available. This is contrary to State law that dictates that the "election" of CC members is to be at the County Convention.

Many Precinct meetings merely took names on a list for CC membership and stopped when they reached the maximum number of positions available in that Precinct and did not have an "election" between nominees at the meeting as they had been instructed. This is also contrary to State law and any commonly accepted practice. Nominations for an elected office are never limited, let alone to the number of positions available. In that case there is no actual election which is a decision by vote between nominees.

Attached see instruction sheet widely distributed and used in the training classes.

Many person were denied their lawful opportunity to compete in an actual election process and have illegally been denied membership in the CC or a least the opportunity to be elected as a member.

