



June 21, 2024

The Fight Continues!

Dear Precinct Delegates,

If we don't demand righteousness in our party, how can we as Republicans advance righteous governance in our state and nation?

The 'uni-party' and their pawns are obsessed with engaging in conflict, enabling them to regain control over every level of the GOP in MI they lost to constitutionalists in the past few years. Which has included lawfare from Matt Deperno in Kalamazoo and Malinda Pego et. al in Kent County.

The judge in the Kent County case has entered a "final order" on June 10th barring me from representing myself as the MIGOP State Committee Chairwoman. That final court order was appealed on June 13th, I am currently subject to the court's order unless the appellant court finds differently.

The Kalamazoo/DePerno case involved many of the same issues ruled on in the MIGOP case in Kent County. Two separate cases occurring in parallel, involving much of the same issues by those (illicitly) attempting to remove me, with the outcomes of the two cases being VERY DIFFERENT, where the same evidence was examined. Regarding the case filed by Malinda Pego, who during the discovery of the case was revealed to be actively sabotaging MIGOP by leaking deceptive financial information, intentionally making false accusation, sowing discord, and attempted to inject known corrupt people into MIGOP. The other case filed by Matt DePerno who also evidenced investment in my removal shortly after he lost the chair race in February 2023.

On June 14th in the Kalamazoo/Deperno case, Judge Bell dismissed the case which was against several people including myself. Attached at the bottom of this email are excerpts from Judge Bell's written opinion. I have highlighted key points of his ruling. This case outcome is a victory for constitutionalists. Michigan and national survival require MIGOP be managed by constitutionalists, not globalist 'uniparty' members and their unwitting assets, who manage both sides of the political conflict, while the average citizen is none the wiser. We have a duty of upholding the National Platform stating, "we are the party of the constitution."

The above being opined, I am still subject to the Kent County court order we have appealed.

What can you do to help minimize the massive disparity of resources between constitutionalist patriots and the 'uniparty'? Your support of any amount would help minimize the financial disparity in this ongoing conflict between constitutionalists and the globalist managed 'uniparty.' Your support would be appreciated to help fund out-of-pocket expenses (i.e., transcripts, court costs, etc.) for the ongoing legal actions. **CLICK THE LINK BELOW**

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Please consider that, as these internal GOP conflicts continue between constitutionalists and the globalist 'uniparty' and their pawns, threaten the survival of our children, grandchildren, and nation, that hangs in the balance. Investing our time and treasure to lawfully remedy this determines whether our children and grandchildren continue rocketing-toward globalist engineered-chaos or change direction to restoration.

Fear Not & Fight Back!

Sincerely,
Kristina Karamo

"And do not fear those who kill the body but cannot kill the soul. Rather fear him who can destroy both soul and body in hell." - Matthew 10:28

EXCERPTS FROM JUDGE BELL'S OPINION

Karamo faced calls to step down as Chairperson of the Michigan Republican State Committee. When she refused to step down, some members of the State Committee held a vote on January 6, 2024. Over 95 % of the delegates present voted to remove Karamo, Hartman, and Copas. The Plaintiffs allege Karamo and Hartman were removed at this vote, and Copas was fired.

The Bylaws required that the policy subcommittee review this vote. The policy subcommittee reviewed the January 6, 2024, vote and ruled it invalid. The State Party then brought the vote to a full State Committee meeting on January 13, 2024. At the January 13, 2024, State Committee meeting, 83 out of 107 State Committee members agreed with the policy subcommittee's findings and voted to nullify the January 6, 2024, meeting that removed Karamo, Hartman, and fired Copas. In addition, the Committee also recognized "Group B" as the leaders of the KGOP.

The Plaintiffs allege that the MIGOP Bylaws provide autonomy to district and county committees. Plaintiffs point to Bylaws stating that even though the State Committee cooperates with the county party organizations, it has no control over them. MIGOP Bylaw Article III

Michigan is similarly reluctant regarding judicial intervention in intraparty disputes. In *American Independent Party of Michigan (Morse-Smith Faction) v Secretary of State*, 397 Mich 689 (1976), two factions of the same political party held separate Conventions, nominated different candidates, and presented different slates of candidates to the State Director of Elections. The Director of Elections advised each faction that he would only certify one slate of candidates approved by both factions—*Id.*, at 693. The Michigan Supreme Court held that the Director of Elections correctly left the resolution of the intraparty dispute to the party. *Id.* at 696. In reaching this decision, the Court stated that “the political processes should function free from judicial supervision unless the infringement of constitutional rights is alleged.” *Id.*

When read together, *American Independence Party of Michigan* and *Heitmanis* establish limitations for a court hearing a dispute involving a political party. First, the matter can not concern a pure question of internal party policy, nor does it include interpreting election law. The second question is whether there is an allegation of Constitutional deprivation.

Here, the Plaintiffs do not allege a violation of their constitutional rights, and the Court is not being asked to interpret election law. The only question remains whether this is a “pure question of internal party policy.” If so, the ruling should follow that of the *American Independence Party of Michigan*, and the Court should dismiss this case as a nonjusticiable intraparty dispute.

The Court is not bound by the labels parties place on their pleadings. *Jahnke v. Allen*, 308 Mich App 472, 475 (2014). The Court can read the complaint to determine its heart. Though Plaintiffs plead breaches of contract and numerous tortious claims, the gravamen of the complaint is: who controls the political party. “Group A” claimed to be the “real KGOP” and labeled the competing faction the “fake KGOP.” If the Court attempts to interpret the Bylaws to decide the dispute, the Court will, in an end-around way, determine who the KGOP has selected as their leadership. Whichever way the Court rules, the Court will decide the leaders of the KGOP. Determining the leadership of a political party is a “pure question of internal party policy.” *Heitmanis v Austin*, 899 F2d 521, 525.

The KGOP and the MIGOP have internal mechanisms to resolve internal disputes. The State Committee has historically interpreted and enforced its Bylaws without judicial intervention. Article III, section M (9) of the MIGOP Bylaws designates the policy subcommittee to interpret the Bylaws when a potential conflict of interest violation arises. The MIGOP successfully implemented this internal review process after the January 6, 2023, vote to

remove Karamo. A full State Committee meeting reviewed the sub-committee findings at a State Committee meeting on January 13, 2023.

The multiple layers of internal review highlight the internal nature of these disputes. The Bylaws allow the committee to be “the proper forum for determining intraparty disputes” *O’Brien v Brown*, 409 US 4, (1972).

The Plaintiffs colorfully claim that “Group B” using the KGOP name is no different than if a rogue group were to claim to be the real Planned Parenthood. The analogy fails from the start. Planned Parenthood is not a political party. Any Planned Parenthood chapter would likely include members from multiple political parties. The Courts have historically given the most deference to political parties and demonstrated the greatest reluctance to intervene in their internal disputes. “The political processes’ should function free from judicial supervision unless the infringement of constitutional rights is alleged.” *O’Brien v. Brown*, 409 U.S. 1, 4-5 (1972). Although Planned Parenthood may engage in lobbying or other political activities, they have a

Heitmanis discourages this Court from intervening in pure questions of “internal party policy.” *Heitmanis v Austin*, 899 F2d 521, 525 (6th Cir 1990). The Michigan Supreme Court also shares a reluctance to intervene in disputes “essentially political in nature.” “No holding of this Court... gives support for judicial intervention in the circumstances...involving...relationships of great delicacy that are essentially political in nature.” *O’Brien v Brown*, 409 US 1, 4 (1972); *American Independent Party of Michigan (Morse- Smith Faction) v Secretary of State* 397 Mich 689 (1976).

Under MCR 2.116 (C) (8), The Plaintiff must establish a claim upon which relief can be granted. “[A]ll well-pleaded allegations are accepted as true and construed most favorably to the non-moving party.” *Wade v Dep’t of Corr*, 439 Mich 158, 162-163 (1992). The judicial standard for summary disposition under this code is relatively high; “A motion under this section may only be granted where the claims are so clearly unenforceable as a matter of law that no factual development could justify recovery.” *Wade* at 163.

The Plaintiffs have pleaded multiple allegations of the Defendant's breach of the KGOP and MIGOP Bylaws in their complaint. These complaints, however, would require the Court to intervene in the internal decisions of the KGOP and MIGOP. Federal and State Court decisions specifically discourage this type of intervention. The claims are unenforceable as a matter of law, and no amount of factual development would change this evaluation. Summary disposition under MCR 2.116 (C)(4), (8) is warranted.

The Court hereby orders and adjudges the Plaintiff's Complaint concerning all counts dismissed for the abovementioned reasons. This is a final order and resolves all pending matters. No costs or attorney fees are awarded.

READ JUDGE BELL'S ENTIRE ORDER



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