

On Sat, Mar 15, 2025 at 4:53 PM Corbin Sabol <[corbinsabol@gmail.com](mailto:corbinsabol@gmail.com)> wrote:  
All,

It appears we have transitioned from a simple and innocent issue of merely signing a petition for a special meeting to discuss a vacancy in our Committee to something completely different and much more serious, having a Chair who has clearly violated the bylaws by illegally denying said petition.

Earlier today I sent the full Committee an email summarizing the entire situation and explaining why the Chair does not have the authority to deny the petition. The bylaws are black and white and our Chair is out of order, however, if you disagree with me in any way please let me know. Furthermore, as concluded in my email, we either take control of our committee now or lose it to centralized control in the executive committee.

To be clear though, the petition was ONLY to schedule a special meeting to discuss legally gathered evidence which suggests a fellow member of our Committee has vacated his seat by moving out of the county. This is an automatic vacancy however and our Chair refuses to acknowledge this vacancy. We can speculate on the reasons why our Chair does not want transparency as does not want the full Committee to see this evidence, but it is wrong at the end of the day and I can't trust people who operate like this.

In any case, I am now quite annoyed, to put in politely, and I think the next course of action is to resend the petition with more signers and it shouldn't be too hard to get a few more. I greatly appreciate your commitment and steadfastness to transparency, accountability and empowering the Committee.

Have a great rest of your weekend.

On Fri, Mar 14, 2025 at 6:11 PM Justin Schlaefli <[justin92071@gmail.com](mailto:justin92071@gmail.com)> wrote:  
I concur. Not sure alternates can weigh in but...

Thank you, Corbin.

-Justin Schlaefli

Sent from my iPhone

On Mar 14, 2025, at 5:36 PM, Corbin Sabol <[corbinsabol@gmail.com](mailto:corbinsabol@gmail.com)> wrote:

Thank you Justin,

I'm just thinking out loud but it appears as though leadership is refusing to follow the bylaws. If Dan does not transmit written notice of the special meeting per section 2.02.05 by tonight, he is in violation of the bylaws which puts us in a tricky situation.

If it comes to that, my recommendation is to notify the whole committee of this bylaw violation however I want to ensure all signers of the special meeting request are ok with that.

If you are, no response is necessary.

If you are not, please let me know.

Thank you.

Corbin Sabol  
860-383-3469

On Fri, Mar 14, 2025 at 9:41 AM Justin Schlaefli <[justin92071@gmail.com](mailto:justin92071@gmail.com)> wrote:  
All,

As a reminder, if you hear threats of legal action or any other such threats (not the first time those have been lobbed), the following Bylaw section protects all of us as members and alternates of the Committee:

Section 4.03 LIABILITY OF OFFICERS, EXECUTIVE COMMITTEE, AND COMMITTEE MEMBERS The Committee shall indemnify and hold harmless its officers, the Executive Director, Executive Committee, and Committee members from any monetary judgment, fine or penalty, including costs of suit and reasonable attorneys' fees resulting from any official acts or omissions of the officer, Executive Committee, or Committee member, except when involving intentional, grossly reckless or grossly negligent acts or omissions arising from activity of the officer or Committee member on behalf of the Committee.

Thank you,  
Justin Schlaefli

On Thu, Mar 13, 2025 at 5:56 PM Justin Schlaefli <[justin92071@gmail.com](mailto:justin92071@gmail.com)> wrote:

All,

I wanted to provide you with information about the special meeting petition which was provided to leadership. Below is the email I forwarded at 6:19 PM yesterday to the Party Secretary, Party Chair and Executive Director last night. I copied Mayor Minto in his capacity as Caucus Chair to verify that the email didn't get lost in transmission or something. Following sending this email, I sent a text message to Paula, Dan and Jacob notifying them that the request had been provided.

Thus far, I haven't heard or seen any communication regarding this special meeting request.

For our collective information, I wanted to provide the following information and briefing on the subject:

### **Authority to Call Special Meeting**

As stated in the petition for special meeting, 15 regular members of the Central Committee have the authority to call for a special meeting. The following is the applicable bylaw section:

" A special meeting with a specific agenda may be called by written petition of 15 regular and/or ex officio members. Upon receipt of such a petition, the Chair must set a time and location for a special meeting to take place within eight (8) days. The Chair must notify the Secretary of the special meeting, and the Secretary shall transmit written notice of the meeting to all members at least six (6) days in advance."

In our case, we created a written petition which was duly signed (docusign for everyone) by 15 regular members.

The petition was received by the Chair (as well as other applicable parties) at 6:19 yesterday. That starts a clock wherein the Chair has no discretion but to schedule a meeting which must take place within eight (8) calendar days. Therefore, the meeting must occur no later than 6:19 PM on Thursday, March 20. Again, there is no discretion on this. In **addition**, the Secretary shall transmit written notice **at least** six days in advance. That means that even if it is scheduled at 6:00 pm on Thursday, March 20, the notice must be transmitted by 6pm tomorrow to meet the bare minimum.

### **Linares Situation**

#### **Bylaws**

Many of you have received updates and information on the Linares situation. The bylaws state the following concerning a vacancy:

"2.01.04 Vacancies and Filling of Vacancies - (A) A vacancy exists in a regular or ex officio membership if the member resigns, dies, ceases to be a registered Republican, is certified as incapacitated, moves out of the Supervisor District in which he or she was elected, or is removed from the Committee."

" 2.01.03 General Rules of Membership - (F) Any regular member who changes legal residence from the Supervisor District in which elected shall be considered to have resigned. (G) For the purposes of membership, including alternates, residency shall mean primary domicile."

### **Domicile**

These two bylaw sections conflict. The vacancy section uses the colloquial term, "moves out" which is commonly understood to mean "to go from one place of residence to another". This is a fairly low bar but could be considered temporarily residing elsewhere for longer than a vacation or a trip. However, the more restrictive section states "changes legal residence" which is defined using the legal term "primary domicile". "Domicile" means the following:

" "Domicile" is defined as the place where you live, where your habitation is fixed, and where you intend to remain and return to whenever you are absent from it. (Elec. Code, §§ 321, 349, 2020-2034.)" This is further defined in the Secretary of State, Voting Law Compliance Handbook as: "Generally, your domicile is where your family lives, where you physically reside, the place you intend to return to whenever you are gone from it, where your driver's license says you reside, and where you claim your homeowner's property tax exemption or renter's tax credit. (Elec. Code, §§ 349, 2020 2034.) " Further explanation is provided in other legal codes: "In California, a primary residence is defined as the place where you voluntarily establish yourself and family, with the intention of making it your true, fixed, permanent home. It is equivalent to domicile, which is the place to which an individual intends to return after an absence. An individual may own more than one residence but can only be domiciled in one state at a time".

### **Application to current situation**

As a result, the definition in the bylaws is unclear but could be read to match the definition of domicile in the election code. I am no attorney so I will share what appears to be stated in court records concerning Mr. Linares. It is unlikely that these records could be considered mistaken identity as the individual in the records with a name and address matching Mr. Linares lists his employment as Reform California, Capitol Media, Asm. Carl DeMaio and the Republican Party of San Diego County. Accordingly, here is what the records I have seen seem to say. Out of privacy concerns, I will share with individuals who request or you can contact Amy Reichert. According to court records available to the public, Mr. Linares was placed on probation on 09/19/2024. In November 2024, a "Notice and Motion for Transfer" was filed in the Court pursuant to Penal Code Section 1203.9 which states:

"1203.9. (a) (1) Except as provided in paragraph (3), whenever a person is released on probation or mandatory supervision, the court, upon noticed motion, shall transfer the case to the superior court **in any other county in which the person resides permanently with the stated intention to remain** for the duration of probation or mandatory supervision, unless the transferring court determines that the transfer would be inappropriate and states its reasons on the record."

On or before 1/15/25, a probation officer of the court certified that "I have verified that the supervised person's residence is in the above county". The county listed is Riverside. The probation period according to court documents is 2 years.

Additionally, Mr. Linares canceled his voter registration in San Diego County and re-registered in Riverside County. Although there is doubt as to the current registration status.

Nevertheless, it appears that Mr. Linares left the County and established a permanent residence in Riverside County for an intended duration of up to 2 years. This is reinforced by a cancelation of registration in San Diego and registering to vote in Riverside County. As of today, a check with the registrar of voters shows that Mr. Linares is not registered to vote in San Diego County at any address based on verbal reports I have received and I believe to be true.

### **Previous Requests of Leadership**

At a minimum, this raises substantial questions as to the status of Mr. Linares as a Central Committee member. This has been reported previously to Chairwoman Whitsell who has declined to declare a vacancy. This was brought up at Executive Committee with no reported resolution. Rather than have this raised in a public session of the Central Committee in a manner which could embarrass the Party, it is therefore advisable that this be handled in a Closed Door, special meeting of the Central Committee.

### **Next Steps:**

A duly signed petition has been submitted. It is my understanding that Asm. DeMaio is calling Central Committee members who have signed the Petition to convince them to take back their signature. This may or may not be appropriate and I will leave it to your conscience to decide. However, it appears clear that Asm. DeMaio is aware of the situation and aware that Mr. Linares relocated to Riverside and would prefer the Committee overlooks this defect.

In any case, should the vacancy be recognized, there are several votes which Mr. Linares participated in which may be considered to be improper or fraudulent or some other appropriate description (based on an understanding that Mr. Linares vacated his seat prior to the December Organizing Meeting. It will be up to the Committee to deliberate on which votes to revisit and re-vote on. However, that is an appropriate discussion for the Committee. As discussed, there is at least one vote which passed and amended the bylaws on a 20-19 basis with Mr. Linares as the deciding vote. These votes may be voided and re-voted on. Additionally, this places a cloud on the bylaws and previous votes which is appropriate for the Central Committee to discuss and vote on.

Thank you,  
Justin Schlaefli  
Alternate, RPSDC Central Committee

----- Forwarded message -----

From: **Justin Schlaefli** <[justin92071@gmail.com](mailto:justin92071@gmail.com)>

Date: Wed, Mar 12, 2025 at 6:19 PM

Subject: Special Meeting Petition

To: <[dmbickford@yahoo.com](mailto:dmbickford@yahoo.com)>, Paula Whitsell <[paula@sandiegorepublicans.org](mailto:paula@sandiegorepublicans.org)>, Paula Whitsell <[PWhitsell@gmail.com](mailto:PWhitsell@gmail.com)>, Jacob Richards <[jacob@sandiegorepublicans.org](mailto:jacob@sandiegorepublicans.org)>, John Minto <[rpsdc.d2chair@gmail.com](mailto:rpsdc.d2chair@gmail.com)>

Mr. Bickford and Madame Chairwoman,

Please see attached the request for special meeting with Agenda duly signed by 15 central committee members. Please acknowledge receipt ASAP and provide notice of the Special meeting pursuant to the bylaws and in accordance with required procedures.

Thank you,  
-Justin Schlaefli

Sent from my iPhone

--  
Corbin Sabol  
Cell: (860) 383-3469