

SALT LAKE COUNTY REPUBLICAN PARTY

Comprehensive Violations Register

Violations of SLCoGOP Bylaws and RONR 12th Edition
*Committed by Chair Mike Carey, Secretary Emily Swanson,
Treasurer Karl Jurek, and Executive Committee Participating Members*

Prepared by: SLCoGOP Bylaws Committee Member

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For Internal Party, State GOP, and Legal Use

Table of Contents

Table of Contents.....	2
I. Governing Framework and Hierarchy of Authority.....	5
II. Summary of Violations	6
III. Detailed Violation Analysis	7
Violation Category 1: Unauthorized Municipal Endorsements (Root Cause).....	7
1.1 Rule(s) Violated	7
1.2 Specific Conduct	7
1.3 Why This Is the Root Cause.....	7
1.4 Chair's Sept. 3, 2025 Email — Key Evidence.....	8
Violation Category 2: Ethics Committee Bypass — Unauthorized Disciplinary Proceedings ...	9
2.1 Rule(s) Violated	9
2.2 Specific Conduct — Seven Defendants Charged Without Ethics Committee Process...	9
2.3 Chair Carey's Defense and Why It Fails.....	9
2.4 Tracie Halvorsen — Even Her Case Was Improperly Escalated	10
2.5 Kirby Glad's Ruling — Parliamentarian Error.....	10
Violation Category 3: Improper Emergency Meeting and Defective Notice	11
3.1 Rule(s) Violated	11
3.2 December 16, 2025 — 'Emergency' Meeting Violations	11
3.2.5 December 16, 2025 — On-Record Violations (CONFIRMED FROM MINUTES).....	11
3.3 January 6, 2026 — Charging Vote Without Proper Notice.....	12
Violation Category 4: Defective and Invalid Charge Documents	13
4.1 Rule(s) Violated	13
4.2 December 16, 2025 — Charges Cited Only 'Cause'	13
4.3 February 9, 2026 — Charges Based on a Subsidiary Authority the Bylaws Supersede	13
4.4 The Underlying Endorsement as a Defense.....	13
Violation Category 5: Improper Presiding Officer / Succession Violation.....	15
5.1 Rule(s) Violated	15
5.2 Specific Conduct at February 9-10, 2026 Trial	15
5.3 Why the Appointment Was Improper.....	15
5.4 Conflict of Interest — Glad as Both Presiding Officer and Parliamentarian.....	16
5.5 Secretary and Treasurer's Failure to Act.....	16
Violation Category 6: Denial of Due Process to the Accused.....	17
6.1 Rule(s) Violated	17
6.2 Specific Due Process Denials	17
6.2.1 Silent Counsel Only.....	17

6.2.2 No Prior Investigation	17
6.2.3 Surprise Evidence	17
6.2.4 No Impartial Jury — Structural Conflict.....	17
6.2.5 Kaye Sanderson — Trial in Absentia Without Proper Notice	18
6.2.6 Charges Voted Simultaneously for Multiple Accused	18
Violation Category 7: Improper Quorum, Voting, and Penalty Procedures.....	20
7.1 Rule(s) Violated	20
7.2 Quorum and Roll Call Violations.....	20
7.3 Cathy Duke — Penalty Imposed Despite Insufficient Quorum.....	20
7.4 Kaye Sanderson — Penalty Issued Unilaterally by Chair	20
7.5 SD22 Chair Position — Unilateral Removal from Leadership Table	20
Violation Category 8: Confidentiality Violations.....	22
8.1 Rule(s) Violated	22
8.2 Specific Violations	22
8.2.1 Disclosure of Secret Ballot Voting Patterns	22
8.2.2 Carey's February 6, 2026 Mass Email.....	22
8.2.3 Mike Carey's Public X (Twitter) Post	22
8.2.4 September 3, 2025 Email — Officers Knew of Carey's Direction to Report	22
Violation Category 9: Chair Carey's Personal Standards of Conduct Violations.....	24
9.1 Rule(s) Violated	24
9.2 Specific Conduct.....	24
9.2.1 Bad Faith in Directing Then Charging Members for the Same Act.....	24
9.2.2 Condescending and Derogatory Language	24
9.2.2(a) Additional Documented Language — Halvorsen Ethics Committee Letter (November 13, 2025).....	24
9.2.3 Carey's Own Ethics Violation — Cleared Without Penalty	25
9.2.4 Hiring and Directing the Parliamentarian	26
9.2.5 Selective Prosecution — The Christian Drain Precedent (December 2, 2025)	26
Violation Category 10: Secretary and Treasurer Participation Violations	27
10.1 Secretary Swanson	27
10.2 Treasurer Jurek.....	27
Violation Category 11: Anticipated Governance Power-Shift — Proposed Bylaw Amendments	28
11.1 Overview.....	28
11.2 Proposal 2 — Binding Bylaw Interpretation (Art. IV §3.A.13) — CRITICAL	28
11.3 Proposal 3 — Removal of Dual-Signature Requirement (Art. III §6.F) — SERIOUS...28	
11.4 Proposal 1 — Records Retention Without Litigation Hold — SERIOUS	29

11.5 Proper Process for Bylaw Amendments	29
Violation Category 12: Failure to Call Petitioned Special CCC Meeting (May 2026)	30
Respondents: Chair Mike Carey (primary)	30
12.1 Rule(s) Violated	30
12.2 Specific Conduct	30
12.3 Why This Constitutes a Separate Violation.....	30
IV. Information Gaps and Areas Requiring Strengthening	32
V. Comprehensive Recommended Remedies.....	35
A. Immediate Actions (County Central Committee or EC).....	35
B. Ethics Committee Referrals.....	35
C. CCC Actions	36
D. State Party and External Actions.....	36
VI. Certification and Attestation	37

I. Governing Framework and Hierarchy of Authority

All proceedings of the Salt Lake County Republican Party are governed by the following hierarchy, per Article XI, Section 3 of the Bylaws:

- **First: SLCoGOP Bylaws (Amended August 21, 2025)**
- Second: Properly adopted rules not in conflict with the Bylaws
- Third: Robert's Rules of Order Newly Revised, 12th Edition (RONR) — ONLY where the Bylaws are silent

The County Central Committee (CCC) is the governing body of the Party (Art. II §6.A). The Executive Committee (EC) derives its authority from the CCC and may not exceed it.

Key structural provisions that define the scope of authority:

- Art. II §6(A): 'The County Central Committee is the governing body of the Party.'
- Art. IV §3(B)(4): The Executive Committee may ONLY 'correct, censure or remove a party member(s) from office or assignment for Standards of Conduct violations.' This is the SOLE provision authorizing EC penalty authority.
- Art. V §3(D)(2): The Ethics Committee 'shall be the exclusive point of contact for members of the party to make reports or claims of violations of the Standards of Conduct.'
- Art. V §3(D)(5): 'The committee's jurisdiction is the Standards of Conduct in the party Bylaws. The executive committee has jurisdiction for the rest of the Bylaws.'
- Art. V §3(D)(9): 'The Executive Committee has the sole power to correct, censure or remove a party member(s) from office or assignment for Standards of Conduct violations.'
- Art. V §3(D)(10): Confidentiality of all Ethics proceedings required.
- Art. XI §4: Endorsements limited to 'the Party's nominee elected at convention.'
- Art. XII: Bylaw amendments require 2/3 vote of CCC with 20% quorum and 14-day advance notice.

II. Summary of Violations

The following table identifies eleven categories of violations documented in this register. Full analysis and recommended remedies follow in Section III.

#	Violation Category	Primary Respondent(s)	Severity
1	Unauthorized Municipal Endorsements (Root Cause)	Carey, EC Members	Critical
12	Failure to Call Petitioned CCC Meeting (May 2026)	Carey	Critical
2	Ethics Committee Bypass — Unauthorized Disciplinary Proceedings	Carey, Swanson, Jurek, EC	Critical
3	Improper Emergency Meeting and Defective Notice	Carey, Swanson	Critical
4	Defective and Invalid Charge Documents	Carey	Critical
5	Improper Presiding Officer / Succession Violation	Carey, Swanson, Jurek	Critical
6	Denial of Due Process to the Accused	Carey, EC, Glad (Parliamentarian)	Critical
7	Improper Quorum, Voting, and Penalty Procedures	Carey, EC	Serious
8	Confidentiality Violations	Carey, EC	Serious
9	Chair's Personal Standards of Conduct Violations	Carey	Serious
10	Secretary and Treasurer Participation Violations	Swanson, Jurek	Serious
11	Anticipated Governance Power-Shift (Proposed Bylaw Amendments)	Carey, Jurek	Critical

Evidence Status Note: Each violation category above contains sub-violations tracked in the Concise Violations Register (v6) with individual CONFIRMED / STRONG / ANTICIPATED status designations. The concise register's 38-item violations matrix (Part VII) provides granular evidentiary status and should be read alongside this document for litigation and advocacy purposes. Status definitions: CONFIRMED = documented in primary evidence confirmed in-hand; STRONG = well-supported by available evidence, further documentation available; ANTICIPATED = not yet a violation but becomes one if proposed action proceeds.

III. Detailed Violation Analysis

Violation Category 1: Unauthorized Municipal Endorsements (Root Cause)

Respondents: Chair Mike Carey; Executive Committee Participating Members (September 2, 2025 vote)

1.1 Rule(s) Violated

Art. XI §4: 'If a nominee is selected, the Party shall support and endorse the Party's nominee elected at convention.'

This provision is the only Bylaw authorization for party endorsements. It is expressly limited to nominees selected through the convention process. Non-partisan municipal elections do not produce 'nominees elected at convention.' The Party therefore has no Bylaw authority to endorse candidates in non-partisan municipal races.

1.2 Specific Conduct

On September 2, 2025, Chair Carey convened an Executive Committee meeting and called a vote to endorse a candidate in non-partisan municipal races. The vote was taken in executive (closed) session via secret ballot. The endorsement was carried out despite:

- A written warning from EC member Tracie Halvorsen on September 1, 2025 that the endorsement was unlawful;
- No Bylaw provision authorizing endorsements outside the convention process;
- Municipal candidates in Utah are non-partisan — they never go through a party convention and are not 'nominees elected at convention';
- Legal counsel's response on September 2 (referenced in trial transcript) addressed only whether the endorsement was protected First Amendment speech — it did not and could not create authority that the Bylaws do not grant;
- The endorsement proceeding was itself conducted in executive session when no Bylaw provision requires or authorizes doing so. RONR 9:24 requires a motion to enter executive session; no such motion appears in the December 2 minutes.

1.3 Why This Is the Root Cause

Every subsequent disciplinary proceeding, charge, trial, removal, and censure stems directly from this unauthorized endorsement. Members Halvorsen, Fetzer, Sanderson, Duke, Phillips Gerrity, Cline, Wilbur, and Gale were prosecuted for responding to an act that the Bylaws did not authorize. The Bylaws (Art. V §3(D)(5)) explicitly encourage members to report illegal

activities to appropriate authorities. Chair Carey himself told Halvorsen on September 3, 2025 to 'call the Murray PD today and file a report' — then charged eight members for doing exactly that.

1.4 Chair's Sept. 3, 2025 Email — Key Evidence

Carey to Halvorsen, Sept. 3, 2025, 9:34 AM: 'if you still believe we are in violation of state law and putting the party at risk...then you should call the Murray PD today and file a report, because we did it last night after going into executive session.'

This email demonstrates that Chair Carey himself directed Halvorsen to contact law enforcement — which is precisely what the accused members did on September 5, 2025. Charging members for following Carey's own instructions constitutes bad faith (Art. I §7.B) and selective enforcement of Standards of Conduct.

REMEDY: The September 2, 2025 municipal endorsement should be declared null and void by the County Central Committee as having been made without Bylaw authority. All charges, trials, verdicts, and penalties arising from members' responses to this unauthorized endorsement should be vacated. The CCC should adopt a formal resolution clarifying that Art. XI §4 limits endorsements to convention nominees only.

Violation Category 2: Ethics Committee Bypass — Unauthorized Disciplinary Proceedings

Respondents: Chair Mike Carey; Secretary Emily Swanson; Treasurer Karl Jurek; Executive Committee participating members collectively

2.1 Rule(s) Violated

Art. V §3(D)(2): 'The [Ethics] committee shall be the exclusive point of contact for members of the party to make reports or claims of violations of the Standards of Conduct.'

Art. V §3(D)(4): '...the committee chair...shall call the committee to meet as soon as possible and act on the claim.'

Art. V §3(D)(5): 'The committee's jurisdiction is the Standards of Conduct in the party Bylaws. The executive committee has jurisdiction for the rest of the Bylaws.'

Art. V §3(D)(7): 'The committee shall conduct private hearings, seek testimony from all parties involved and from witnesses, if possible; make findings and privately report findings and recommendations in writing to the Executive Committee in a regularly scheduled or emergency meeting in closed session.'

Art. IV §3(B)(4): EC may 'Correct, censure or remove a party member(s) from office or assignment for Standards of Conduct violations' — this is the ONLY penalty authority provision in the Bylaws.

2.2 Specific Conduct — Seven Defendants Charged Without Ethics Committee Process

Of the eight members charged and tried, seven (Fetzer, Sanderson, Duke, Phillips Gerrity, Cline, Wilbur, and Gale) were charged solely under RONR §61:3 for 'conduct tending to injure the good name of the party.' The charges allege the accused acted 'maliciously and frivolously' — language that directly implicates Art. I §7.B Standards of Conduct (good faith, fairness, honesty). The EC proceeded without any Ethics Committee process for these seven:

- No written complaint was submitted to the Ethics Committee;
- No Ethics Committee intake, investigation, or hearing was conducted;
- No Ethics Committee findings or recommendations were reported to the EC;
- The EC voted to bring charges at its January 6, 2026 meeting based solely on the Chair's presentation, not an Ethics Committee recommendation.

2.3 Chair Carey's Defense and Why It Fails

In his February 6, 2026 response to Michael Duke's written warning, Carey argued that RONR §61:3 ('conduct tending to injure the good name') falls outside the Standards of Conduct framework. This argument fails for three reasons:

1. The charges themselves allege malice and bad faith — which are expressly Standards of Conduct violations under Art. I §7.B ('honesty, fairness...good faith'). You cannot charge someone with acting in bad faith without implicating the Standards of Conduct.
2. The Bylaws (Art. V §3(D)(5)) give the Ethics Committee jurisdiction over 'the Standards of Conduct in the party Bylaws' and give the EC 'jurisdiction for the rest of the Bylaws.' The EC then attempted to use RONR — a subsidiary authority — to create disciplinary

jurisdiction the Bylaws do not grant. RONR applies only where the Bylaws are silent; on discipline, the Bylaws are explicit.

3. Art. IV §3(B)(4) is the only EC provision authorizing removal, censure, or correction — and it expressly limits that authority to 'Standards of Conduct violations.' There is no parallel EC authority to remove members for non-Standards-of-Conduct violations. Importing RONR §61:3 as an independent basis for removal directly contradicts the plain text of Art. IV §3(B)(4).

2.4 Tracie Halvorsen — Even Her Case Was Improperly Escalated

Halvorsen was the only defendant whose case went through the Ethics Committee. The Ethics Committee reviewed the complaint and recommended only censure and a request to cease disrespectful conduct. Instead of following that recommendation, Carey elevated her case to a full trial seeking removal from all party positions. No Bylaw provision authorizes the Chair or EC to escalate a matter beyond the Ethics Committee's recommendation without new cause.

2.5 Kirby Glad's Ruling — Parliamentarian Error

At the January 6, 2026 EC meeting, parliamentarian Kirby Glad (hired by Chair Carey) ruled that the Ethics Committee exclusivity clause did not apply because the charges were 'not charging the individuals with any criminal activity.' This ruling conflates two distinct concepts:

- The Ethics Committee exclusivity clause (Art. V §3(D)(2)) applies to Standards of Conduct claims, not criminal claims — the reference to criminal law in Art. V §3(D)(5) tells the Ethics Committee NOT to handle criminal matters;
- Glad's ruling effectively nullified the Ethics Committee's exclusive jurisdiction based on a misreading of the Bylaws;
- This ruling was recorded as a discrepancy (D-002) in the SLCoGOP Trial Governance Review (UnjustGovernanceReview.pdf) based on the transcript evidence.

REMEDY: All verdicts and penalties imposed at the February 9-10, 2026 trials should be vacated as having been reached through a process that violated Art. V §3(D)(2)-(7) and Art. IV §3(B)(4). Any legitimate conduct concerns must be re-filed with the Ethics Committee. The Ethics Committee must conduct proper intake, investigation, and recommendation per the Bylaws before the EC can take any disciplinary action.

Violation Category 3: Improper Emergency Meeting and Defective Notice

Respondents: Chair Mike Carey (primary); Secretary Emily Swanson

3.1 Rule(s) Violated

RONR 63:21: Accused must receive at least 30 days' advance notice of trial.

RONR 63:28: Trial notice must include 'the date, hour, and place of the trial.'

RONR 9:24: 'A meeting enters into executive session ONLY when required by rule or established custom, OR UPON THE ADOPTION OF A MOTION TO DO SO.'

Art. XI §3: Where Bylaws are silent, RONR is the default. The Bylaws contain no trial notice provision, making RONR 63:21 and 63:28 controlling.

3.2 December 16, 2025 — 'Emergency' Meeting Violations

Carey called an 'emergency' Executive Committee meeting on December 5, 2025 for December 16, 2025 — eleven calendar days' notice. This violated RONR in multiple respects:

- **INADEQUATE NOTICE** (11 days vs. required 30): The meeting was noticed December 5; the trial date was December 16 — eleven days, not the required thirty. (RONR 63:21)
- **INCOMPLETE NOTICE:** Fetzer and Sanderson did not receive the location and time of the meeting until December 15, 2025 — one day before. RONR 63:28 requires the trial notice to include the 'date, hour, and place.' The original notice omitted both.
- **SPURIOUS 'EMERGENCY' DESIGNATION:** The letter triggering the meeting was dated September 5, 2025 — more than four months before the meeting. No set of facts can make a four-month-old letter an 'emergency.' The designation appears designed to circumvent normal notice requirements.
- **AGENDA OPENED DIRECTLY INTO EXECUTIVE SESSION:** The December 16 agenda (sent 10 PM December 15) was formatted as an 'Executive (Closed) Session' from the outset. RONR 9:24 requires a motion to enter executive session. Art. IV §2 (EC meetings) contains no provision for a meeting to open directly into closed session.

3.2.5 December 16, 2025 — On-Record Violations (CONFIRMED FROM MINUTES)

The December 16, 2025 EC meeting minutes (EC_Minutes_20251216.pdf, CONFIRMED) document that the meeting convened but no trial occurred. The meeting was adjourned at 8:35 PM. Five on-record procedural violations were raised:

- **POINT OF ORDER — INADEQUATE NOTICE (Vasic):** Jensen Vasic raised a Point of Order that the meeting was called with inadequate notice. Chair Carey overruled the point.
- **POINT OF ORDER — EXECUTIVE SESSION WITHOUT MOTION (Fetzer):** Laurel Fetzer raised a Point of Order that the meeting opened directly into executive session without a motion to do so, in violation of RONR 9:24. Chair Carey overruled the point.
- **SANDERSON AND FETZER DEPARTED:** Kaye Sanderson, Laurel Fetzer, and legal counsel departed the meeting before proceedings continued, on the grounds that the meeting was procedurally invalid.
- **RECORDING SUPPRESSION — MOTION PASSED THEN RECALLED:** A motion to record the meeting was made and passed. Steven Miller then immediately moved to recall the motion; the recall was adopted. This sequence — approving a recording then

immediately suppressing it — constitutes deliberate suppression of an official record of party business.

- EC FORMALLY ACKNOWLEDGED DEFECTIVE NOTICE: The EC passed a motion to 'continue the meeting with at least 30 days notice given.' This motion is a formal self-admission by the EC that the original notice was defective and that 30 days was the correct standard. The EC's own vote is dispositive evidence that the December 16 proceeding violated RONR 63:21.

3.3 January 6, 2026 — Charging Vote Without Proper Notice

Secretary Swanson's call to the January 6, 2026 EC meeting (sent December 23, 2025) described the meeting purpose as 'caucus preparations.' The agenda listed only 'Ethics Committee Reports' and 'Bylaws Committee Report' under Executive Session. There was no advance notice that:

- The EC would be voting on charges against eight members;
- Those charges would serve as the basis for formal trials;
- Members who were the subject of the charges would be cited for trial at that meeting.

Audio recordings (LaurelFetzer_Audio transcripts) confirm that EC members objected at the January 6 meeting that adding a charging vote without proper notice was out of order.

Parliamentarian Glad nonetheless allowed the proceeding to continue, ruling that because the agenda said 'executive session,' any business could be conducted — effectively granting the Chair unlimited authority to surprise members with unnoticed actions.

CONFIRMED FROM JANUARY 6, 2026 MINUTES (EC_Minutes_20260106.pdf): The minutes confirm (a) charges were preferred by a 2/3 majority vote of the EC; (b) all eight defendants were named by their positions; (c) Kirby Glad served as parliamentarian at the January 6 meeting — confirming his involvement began at the charging stage, not merely at trial; (d) Mark Brinton was listed as SD9 Chair and voting EC member at the January 6 meeting (not as parliamentarian). Brinton therefore voted on charges against members in whose trial he would later participate — a dual conflict of interest.

NOTE — SD9 CHAIR BRINTON DUAL CONFLICT: Mark Brinton attended the December 2, 2025 EC meeting (confirmed in attendance list) when the EC set the December 16 meeting specifically to consider removal of Sanderson and Fetzer. Brinton was then present at the January 6 charging vote and later at the February 9 trial proceedings. As an EC member who participated in the December 2 discussion triggering the proceedings and the January 6 charging vote, Brinton had a direct conflict of interest in serving as a juror at trial — violating RONR 63:13 (impartial tribunal requirement).

REMEDY: The December 16, 2025 'trial' was void ab initio for failure to provide 30-day notice, failure to provide location/time in advance, and improper direct opening into executive session. The January 6, 2026 charging vote was procedurally defective for lack of advance notice of the nature of the business to be conducted. Both actions and all consequences flowing from them should be declared null and void.

Violation Category 4: Defective and Invalid Charge Documents

Respondents: Chair Mike Carey

4.1 Rule(s) Violated

RONR 63:24-25: 'A charge sets forth an offense — that is, a particular kind of act or conduct that entails liability to penalty under the governing rules.' Charges must cite specific provisions of the governing documents violated.

Art. IV §3(B)(4): The only EC authority to impose penalties is for 'Standards of Conduct violations.' RONR §61:3 is not a Bylaw provision and creates no independent disciplinary authority.

Art. V §3(D)(5): EC has 'jurisdiction for the rest of the Bylaws' — not for RONR provisions that are not in the Bylaws.

4.2 December 16, 2025 — Charges Cited Only 'Cause'

The December 5, 2025 notice for the December 16 'emergency' meeting (Packet-1 / Figure 7 in the Unlawful Removal document) failed to provide any specific charges. The notice cited only 'cause' without identifying: (a) which Standards of Conduct provision was violated, (b) the specific conduct alleged, or (c) any factual specification. RONR 63:24-25 requires charges to be specific.

4.3 February 9, 2026 — Charges Based on a Subsidiary Authority the Bylaws Supersede

The January 6 charges cited RONR §61:3 ('conduct tending to injure the good name of the organization'). This is defective in three ways:

4. RONR §61:3 is not a Bylaw provision. The Bylaws are the supreme governing document. The EC may only exercise authority expressly granted by the Bylaws. The Bylaws grant no removal authority based on a RONR citation.
5. RONR applies only where the Bylaws are silent (Art. XI §3). The Bylaws are not silent on discipline — they provide an explicit, complete framework: Ethics Committee intake → investigation → recommendation → EC action. RONR's general disciplinary provisions are displaced by this framework.
6. Charges cited 'maliciously and frivolously' — language that is directly synonymous with bad faith (Art. I §7.B). This confirms the charges are Standards-of-Conduct-based, which requires the Ethics Committee process the EC skipped.

4.4 The Underlying Endorsement as a Defense

The charges allege members sent a letter to authorities 'maliciously and frivolously' alleging criminal election interference. However: (1) the endorsement that prompted the letter was itself unauthorized under Art. XI §4; (2) Art. V §3(D)(5) expressly encourages members to report illegal activities to appropriate authorities; (3) Chair Carey told Halvorsen to 'call the Murray PD today and file a report' — the accused members did exactly what their Chair directed.

REMEDY: All charges filed against the eight members should be dismissed as legally defective — lacking proper specificity (RONR 63:24-25), citing a subsidiary authority (RONR §61:3) that the Bylaws' explicit disciplinary framework displaces, and arising from members' lawful response to an unauthorized party action under Art. V §3(D)(5).

Violation Category 5: Improper Presiding Officer / Succession Violation

Respondents: Chair Mike Carey; Secretary Emily Swanson; Treasurer Karl Jurek

5.1 Rule(s) Violated

Art. III §4(A)(2): Vice Chair shall 'Be acting chair in the Chair's absence or during a vacancy in the Chair's office.'

Art. III §5(A): Secretary shall 'Be acting Chair in the absence of both the Chair and Vice Chair.'

Art. III §6(A): Treasurer shall 'Be acting chair in the absence of all other officers.'

5.2 Specific Conduct at February 9-10, 2026 Trial

When the February 9-10, 2026 trials began, Chair Carey announced he would 'vacate the chair' to serve as the prosecution 'manager.' The following occurred:

- Vice Chair Sarah Montes refused to participate and left the meeting before the trial commenced, citing the proceedings as unlawful. Critically, Montes had placed the full Executive Committee on written record four days earlier: on February 5, 2026 at 3:06 PM she sent a reply-all to every EC officer and member — not a private note to Carey — with the following verbatim warning: "Reporting something you genuinely believe is wrong is not a crime — and it shouldn't be punished. If someone is removed or censured from leadership for speaking up, the courts are going to see that as retaliation, and that will not reflect well on this Committee. This hearing is a serious mistake, and insurance likely won't protect us if the action is unlawful. I will be present for the Committee Meeting, but will excuse myself from the hearing." Every officer and EC member therefore had written, on-record notice of the Vice Chair's legal warning before the trial proceeded.
- Secretary Emily Swanson was present throughout the trial;
- Treasurer Karl Jurek was present throughout the trial;
- Chair Carey, rather than following the Bylaw succession chain (which would pass the chair to Secretary Swanson), appointed Parliamentarian Kirby Glad — a non-officer who is not in the succession chain at all — as 'Chair Pro Tem.'

5.3 Why the Appointment Was Improper

The Bylaws establish an explicit, exhaustive succession chain: Chair → Vice Chair → Secretary → Treasurer. When the Chair vacated to serve as manager:

7. Vice Chair Montes having left, the chair should have passed to Secretary Swanson under Art. III §5(A);
8. Secretary Swanson's presence and failure to assume the chair allowed an unauthorized presiding officer to conduct the proceedings;
9. A parliamentarian is not an officer of the party. Appointing a non-officer as presiding officer bypasses the explicit Bylaw succession chain and is inconsistent with the Bylaws as the supreme authority.

SANDERSON ALLEGATION — GLADWIN PRE-INSTALLATION: Kaye Sanderson has alleged that Kirby Glad was designated or pre-arranged as the presiding parliamentarian prior to the January 6, 2026 meeting — suggesting the appointment was not made in good faith response to Montes leaving, but was pre-planned by Chair Carey as a mechanism to ensure a favorable

presiding officer. This allegation, if documented, would further undermine the legitimacy of the trial process.

5.4 Conflict of Interest — Glad as Both Presiding Officer and Parliamentarian

Kirby Glad simultaneously served as:

- The Chair Pro Tem presiding over the entire trial;
- The parliamentarian retained and compensated by Chair Carey (via payment in kind per the KirbyGlad_Complaint_signed.pdf);
- The ruling authority on all points of order raised by the defense;
- A participant who ruled against the defense's objections regarding Ethics Committee jurisdiction, succession, and due process.

This structural dual role meant a hired, compensated agent of the Chair served as the presiding judge in a trial the Chair initiated — eliminating any appearance of impartiality. This is documented in the SLCoGOP Trial Governance Review (Discrepancy D-102) and confirmed in the KirbyGlad complaint filed with NAP.

5.5 Secretary and Treasurer's Failure to Act

Secretary Swanson's failure to assume the chair when the succession chain required it, and Treasurer Jurek's participation in a trial over which they had no proper authority to preside or to vote on guilt/penalty, constitute independent violations of their officer duties.

REMEDY: All rulings, verdicts, and actions taken under Glad's presiding authority are void as having been made by a non-officer in violation of the Bylaw succession chain. Secretary Swanson should have assumed the chair per Art. III §5(A). The SLCoGOP should formally request NAP impose appropriate sanctions on Glad, and the EC should formally censure the Chair for this breach of the succession structure.

Violation Category 6: Denial of Due Process to the Accused

Respondents: Chair Mike Carey; Executive Committee participating members collectively; Parliamentarian Glad

6.1 Rule(s) Violated

RONR 63:30: Accused 'has the right to be represented by counsel and to speak and produce witnesses in his own defense.'

RONR 63:7: An investigation committee is required before trial in cases that may be delicate, lengthy, or involve scandal.

RONR 63:21: 30-day advance notice of trial.

RONR 63:13: Trial committee must be impartial.

RONR 63:12: The accused is entitled to a trial separate from other accused.

6.2 Specific Due Process Denials

6.2.1 Silent Counsel Only

The December 16, 2025 agenda specified 'Silent Counsel Only' for the accused. RONR 63:30 guarantees the accused the right to be 'represented by counsel' who may 'speak' — not silent counsel. The Bylaws are silent on counsel; therefore RONR controls (Art. XI §3). Restricting counsel to silence directly violated RONR 63:30.

6.2.2 No Prior Investigation

No investigation was conducted before charges were filed against any of the seven defendants charged under RONR §61:3. RONR 63:7 requires an investigation committee before trial where the matter may be delicate, scandalous, or lengthy. The trial of eight members — involving allegations sent to the FBI, the US Attorney General, and multiple city attorneys — is self-evidently delicate and scandalous. No investigation committee was formed, no witnesses were interviewed, and no investigation report was presented.

6.2.3 Surprise Evidence

At trial, evidence and allegations beyond those stated in the written charging documents were introduced. Defense counsel Michael Duke and others objected on the record to 'surprise evidence.' The Trial Governance Review (Discrepancy D-103) documents this objection. RONR's notice and fairness principles require that the accused have advance notice of all evidence to be used against them.

6.2.4 No Impartial Jury — Structural Conflict

The Executive Committee simultaneously served as: (a) the body that approved the unauthorized endorsement on September 2; (b) the charging body that voted charges on January 6; (c) the prosecution manager; (d) the jury; and (e) the penalty-imposer. EC members voted on charges in which they had a direct interest as participants in the original endorsement

decision. RONR 63:13 requires an impartial tribunal. The EC's structural self-interest disqualifies it as an impartial jury.

6.2.5 Kaye Sanderson — Trial in Absentia Without Proper Notice

Kaye Sanderson did not attend the February 9 trial. RONR 63:31 allows trial in absentia only when the accused has been properly noticed. Sanderson's notice of the December 16 hearing lacked the required hour and location (not provided until one day before). While the February 9 charges provided location, the cumulative notice failures denied her meaningful preparation time.

6.2.6 Charges Voted Simultaneously for Multiple Accused

The January 6 EC transcript shows charges were presented for multiple members simultaneously. RONR 63:12 requires each accused to have a separate trial unless the charges arise from a joint act in which all participated. While some joint-act exception may apply to members who co-signed the September 5 letter, this does not authorize consolidating all proceedings into a single simultaneous vote on charges.

6.2.7 Mid-Trial Indemnification of Voting Members Before Penalty Vote

An unidentified attorney provided EC voting members with an indemnification assurance mid-trial — before the penalty vote was taken. The procedural integrity of a removal vote is fundamentally compromised when voting members have been indemnified against personal liability for those votes before casting them. Indemnification eliminates the personal accountability that acts as a primary check against arbitrary or unlawful votes. No Bylaw provision authorizes mid-trial indemnification, and its provision by an unidentified attorney — rather than properly retained party counsel — raises additional questions about who authorized and funded it.

- ▶ Authority: RONR (12th ed.) §63 (good faith and integrity of proceedings); Bylaws Art. I §7B
- Evidence: Cathy Duke trial summary (Trial_CathyDuke.docx) — indemnification assurance confirmed on record

6.2.8 Bar Complaint Filed Against Defense Counsel

A bar complaint was filed against the defendants' legal counsel during or after the trial proceedings, documented in the trial procedures record. Filing a bar complaint against opposing counsel in active proceedings — whatever its ultimate merit — creates a chilling effect on the defendants' right to representation. This compounds the silent-counsel restriction (Section 6.2.1) by further undermining effective legal representation. The combination of restricting counsel to silence at the December 16 meeting and later filing a bar complaint against trial counsel constitutes a pattern of impeding defense access to legal representation.

- ▶ Authority: RONR (12th ed.) §63:30 (right to counsel); due process principles
- Evidence: Trial procedures document (TrialProcedures) — bar complaint documented

REMEDY: All trial verdicts and penalties must be vacated for systematic denial of due process: no impartial jury (RONR 63:13), no prior investigation (RONR 63:7), restriction of counsel (RONR 63:30), and surprise evidence. Retrial — if any — must follow proper Ethics Committee process (Art. V §3(D)), be presided over by an impartial officer per the succession chain, and afford full RONR 63 due process protections.

Violation Category 7: Improper Quorum, Voting, and Penalty Procedures

Respondents: Chair Mike Carey; Executive Committee participating members collectively

7.1 Rule(s) Violated

Art. IV §1(E)(2): EC may 'by 2/3 vote with minimum 2/3 quorum remove members.' For a 23-member EC, 2/3 quorum = 16 members present; 2/3 vote of those present then required.

RONR: Roll call must establish quorum before any vote.

7.2 Quorum and Roll Call Violations

The Trial Governance Review (Discrepancy D-105) confirms that no roll call was conducted at the trial. The transcript records a discussion that 'we need a quorum...I see 13 in attendance...we need a quorum of 12. We have 13.' This discussion reveals a critical error:

- The quorum calculation (12 = majority of 23) was for regular business. Removal of a member requires a 2/3 quorum — 16 of 23 members;
- If only 13 members were present, the EC lacked the 16-member 2/3 quorum required for removal under Art. IV §1(E)(2);
- No formal roll call verified who was present — only a visual count.

7.3 Cathy Duke — Penalty Imposed Despite Insufficient Quorum

Cathy Duke was found guilty (13-1) and sentenced (14-1 reprimand). If only 13-14 members were present, the EC did not meet the 16-member 2/3 quorum required for any removal or disciplinary action against a member under Art. IV §1(E)(2). Even a reprimand, which short of removal, must be imposed through a properly convened EC meeting.

7.4 Kaye Sanderson — Penalty Issued Unilaterally by Chair

The punishment letter to Kaye Sanderson (dated February 18, 2026) was signed by Chair Mike Carey alone. The penalties imposed were severe (CONFIRMED IN-HAND, RONR_HearingVerdict_Sanderson.pdf): removal from all party positions elected or appointed; barred from all Republican events through May 1, 2030; public censure posted to the SLCo GOP website. These are among the most severe penalties available under the Bylaws — equivalent to or exceeding what was imposed on Cathy Duke, who appeared at trial. No Bylaw provision authorizes the Chair to unilaterally impose these penalties. The EC as a body must vote on penalties; the Chair communicates the result but does not have independent penalty authority.

- Art. IV §3(B)(4) grants penalty authority to the EC, not the Chair;
- Art. V §3(D)(9) states the EC has 'sole power' to correct, censure, or remove;
- Carey signing the punishment letter as an individual officer misrepresents the source of authority.

7.5 SD22 Chair Position — Unilateral Removal from Leadership Table

Per the KirbyGlad_Complaint_signed.pdf, Chair Carey unilaterally removed the SD22 chair position from the leadership table. If this was done to reduce the number of EC seats for

quorum calculation purposes, it constitutes an unauthorized alteration of the EC's composition — a power reserved to the CCC, not the Chair.

REMEDY: The EC must formally verify the quorum present at each trial session. If fewer than 16 members were present for any removal or penalty vote, that vote must be declared void. Chair Carey must retract the unilaterally issued Sanderson punishment letter; any penalty must be voted on by a properly convened EC with 2/3 quorum. The SD22 chair position must be restored to the leadership table.

Violation Category 8: Confidentiality Violations

Respondents: Chair Mike Carey; Executive Committee participating members collectively

8.1 Rule(s) Violated

*Art. V §3(D)(10): Confidentiality of all Ethics Committee proceedings required for all participants.
RONR: Business conducted in executive session is strictly confidential; disclosure to non-members is prohibited.*

8.2 Specific Violations

8.2.1 Disclosure of Secret Ballot Voting Patterns

The September 2, 2025 endorsement vote was taken by secret ballot in executive session. The charging documents (Packet-1) state that Fetzer and Sanderson 'named which Executive Committee members voted not to endorse a candidate' and that this 'vote was taken in closed executive session via secret ballot.' However, the charging documents themselves (filed January 6, 2026) could only identify the specific votes cast by disclosing the secret ballot results — confirming that the voting pattern information was already known to Carey's camp. The Trial Summary (Trial_CathyDuke.docx) notes 'specific voting patterns leaked to claimants' as a confidentiality breach detected by 'general counsel' at the trial. The direction of the leak was not from the defendants — it was from within the EC.

8.2.2 Carey's February 6, 2026 Mass Email

Chair Carey sent an email on February 6, 2026 to 50+ recipients — including non-members of the EC — discussing the upcoming trial, the charges, the EC's position, and their legal consultations. The subject line 'Salt Lake County Republican Party — Notice of Charges and Trial' was distributed well beyond the EC membership. Trial proceedings, pre-trial notices, and legal strategy are all confidential under RONR and should not have been disclosed to non-members.

8.2.3 Mike Carey's Public X (Twitter) Post

Following the trial, Chair Carey posted publicly on X (Twitter): 'Salt Lake County GOP Takes Decisive Action Against Baseless Attacks and Internal Sabotage' — publicizing the disciplinary proceedings and the outcome. This violated: (a) RONR requirements that executive session business remain confidential; (b) Art. V §3(D)(10) confidentiality requirements; and (c) the Trial Summary's statement that 'no public announcement will be made and it will not be spread on social media.'

8.2.4 September 3, 2025 Email — Officers Knew of Carey's Direction to Report

Chair Carey's September 3, 2025 email (Email 8, 9:34 AM) directing Halvorsen to 'call the Murray PD today and file a report' was carbon-copied to Vice Chair Sarah Montes, Secretary Emily Swanson, and Treasurer Karl Jurek. This is significant for two reasons:

- All three officers received Carey's instruction to report to law enforcement — meaning they had direct knowledge that Carey himself had endorsed the same course of action for which eight members were later charged. Their silence at the January 6 charging

vote and February 9 trial, despite this knowledge, constitutes a failure of officer good faith (Art. I §7.B).

- Vice Chair Montes, who later refused to participate in the trial and stated the proceedings were unlawful, was on record receiving this email and observing the contradiction — lending credibility to her position that the trial was in bad faith.

REMEDY: Chair Carey should be formally censured by the EC for violating confidentiality through public posts and mass-email disclosure of trial proceedings. The X post should be removed. The Kaye Sanderson verdict letter, which states censure will be 'posted on the SLCo GOP website,' should be retracted as it compounds the confidentiality violation and was imposed without proper process.

Violation Category 9: Chair Carey's Personal Standards of Conduct Violations

The September 3, 2025 email — written on official party email to a fellow EC member, CC'd to three other officers — contained the following direct quotes:

- "You are entitled to your opinion, Tracie, but you're also allowed to be wrong."
- "Let's not be coy, Tracie...this was all about the McCay's as was obvious from your first letter."
- "There is no hiding that this was an overtly personal vendetta for you."
- "You got your first win in a while, and you got your scalp."
- "I guess we just wait now for your next threat."

This language — transmitted on official party channels, copied to three officer witnesses (Vice Chair Montes, Secretary Swanson, Treasurer Jurek) — characterizes a member's legitimate governance concern as a "personal vendetta" and her exercise of lawful reporting rights as a "threat." It violates Art. I §7.B (civility and respect for others) and §7.C (refrain from inappropriate or derogatory language). It was also written five months before Vice Chair Montes issued her February 5, 2026 reply-all warning — confirming that Montes's concern about the Chair's bad faith was grounded in direct, contemporaneous knowledge of this language.

9.1 Rule(s) Violated

Art. I §7: 'All members and officers of the Party shall conduct themselves with honesty, fairness, civility, respect for others and good faith in all interactions within the Party.' (§7.B) 'Members shall refrain from inappropriate or derogatory language.' (§7.C)

9.2 Specific Conduct

9.2.1 Bad Faith in Directing Then Charging Members for the Same Act

On September 3, 2025, Carey wrote to Halvorsen: 'if you still believe we are in violation of state law...then you should call the Murray PD today and file a report.' Four months later, Carey charged eight members with 'conduct tending to injure the good name of the party' for sending a complaint letter to authorities. Directing members to report to law enforcement and then prosecuting other members for the same act violates the good faith requirement of Art. I §7.B.

9.2.2 Condescending and Derogatory Language

The September 3, 2025 email to Halvorsen contained the following:

'You are entitled to your opinion, Tracie, but you're also allowed to be wrong.' / 'Let's not be coy, Tracie...this was all about the McCay's as was obvious from your first letter.' / 'There is no hiding that this was an overtly personal vendetta for you.' / 'You got your first win in a while, and you got your scalp.'

This language violates Art. I §7.B (civility and respect) and §7.C (refrain from derogatory language). It was written to a fellow EC member on an official party email account.

9.2.2(a) Additional Documented Language — Halvorsen Ethics Committee Letter (November 13, 2025)

Tracie Halvorsen's November 13, 2025 formal letter to the Ethics Committee (EthicsCommitteeLetter_20251113.pdf) documents additional on-record language by Chair

Carey that violates Art. I §7.B and §7.C. Halvorsen submitted the letter not to call for Carey's censure, but to establish the selective-enforcement argument: if the Party disciplines members for speech, it must apply the same standard to the Chair. The following language is documented with enclosures in her filing:

- To another party member, on the record: "You again? I thought I blocked your racist chicken shit, big talking dumb ass a long time ago." — Chair Mike Carey (quoted verbatim in Halvorsen Ethics Committee letter, November 13, 2025, with supporting post images attached as enclosures).
- Carey referred to Lyman supporters as "little domestic terrorists" — on the eve of, as Halvorsen notes, senseless violence. This characterization of fellow party members violates Art. I §7.B (civility and respect) and §7.C (refrain from derogatory language) on its face.

The significance of the Halvorsen letter for the violations record is threefold: (1) it was submitted to the Ethics Committee on November 13, 2025 — weeks before the January 6, 2026 charging vote — placing the Ethics Committee on notice of Carey's own language violations; (2) the Ethics Committee took no documented action against Carey while simultaneously being used (without proper process) as the predicate for charges against eight other members; (3) the specific language documented by Halvorsen is objectively more severe than any conduct alleged against the eight defendants, making the differential treatment direct evidence of selective and discriminatory enforcement.

9.2.2(b) Casey Gale Formal Ethics Complaint — Verbatim iMessage Language (November 6, 2025)

On November 6, 2025, Casey Gale filed a formal ethics complaint to ethics@slcogop.com submitting iMessage screenshots in which Chair Carey wrote the following to a party member:

— "go fuck yourself, Casey"

— "You're a scumbag"

— "Lawyer up, fucker"

This complaint was filed while Carey was simultaneously initiating the disciplinary process against the eight members. The language documented in the Gale complaint is objectively more severe than any conduct alleged against the eight defendants — none of whom are accused of directing obscene or threatening language at another party member. The Ethics Committee took no documented action on the Gale complaint. This makes the differential treatment direct evidence of selective and discriminatory enforcement: conduct that is objectively more severe by the Chair resulted in no consequences, while lawful reporting conduct by eight members resulted in removal and censure.

▶ Authority: Bylaws Art. I §7.B (civility, good faith); §7.C (refrain from inappropriate/derogatory language)

● Evidence: Fwd Formal Ethics Complaint Against Party Chairman Mike Carey.pdf — Gale complaint filed Nov. 6, 2025; iMessage screenshots attached

9.2.3 Carey's Own Ethics Violation — Cleared Without Penalty

Per the KirbyGlad complaint, the January 6, 2026 executive session reviewed Ethics Committee reports that included a complaint against Chair Carey himself. That session cleared Kaye Sanderson of the ethics complaint against her while simultaneously confirming Carey violated ethics — but Carey faced no sanction. The Ethics Committee's exclusive authority (Art. V §3(D)(9)) and the EC's power to correct, censure, or remove (Art. IV §3(B)(4)) apply equally to

the Chair. The failure to impose any consequence on Carey while aggressively pursuing eight other members constitutes selective and discriminatory enforcement.

9.2.4 Hiring and Directing the Parliamentarian

Carey hired and compensated Kirby Glad via payment in kind, then had him appointed as the presiding officer of trials Carey initiated. A parliamentarian hired and compensated by one party in a proceeding cannot be impartial. This arrangement was disclosed in Carey's February 6, 2026 email: 'We have consulted with legal counsel and a parliamentarian on the process' — the same parliamentarian who then presided over the trial and ruled against every defense objection.

9.2.5 Selective Prosecution — The Christian Drain Precedent (December 2, 2025)

The December 2, 2025 EC meeting minutes (EC_Minutes_20251202.pdf, public session) document that the EC voted in executive session to remove Christian Drain from all party positions. The stated basis was offensive racist posts online and a pending criminal trial. Penalties included: removal from all elected or appointed party positions; suspension of all party privileges until Drain expresses remorse and his criminal trial is adjudicated favorably; or, if neither occurs, suspension for two years.

The Drain removal establishes a selective prosecution precedent directly relevant to the charges against the eight members:

- **DRAIN'S CONDUCT — OBJECTIVE STANDARDS VIOLATION:** Drain's conduct (racist posts, criminal charges) was a clear, objective violation of Art. I §7 Standards of Conduct. Removal was proportionate and the conduct was unambiguous.
- **THE 8 MEMBERS' CONDUCT — LAWFUL REPORTING:** The eight charged members sent a letter to law enforcement reporting suspected illegal activity. Art. V §3(D)(5) expressly states the Bylaws 'encourage members to report illegal activities to appropriate authorities.' Chair Carey himself directed Halvorsen to do the same on September 3.
- **DIFFERENTIAL TREATMENT — SAME CAREY-CONTROLLED PROCESS:** Both Drain's removal and the charges against the eight were processed through the EC under Carey's direction. Drain, who engaged in objectively harmful conduct, was removed with EC proceedings. The eight members, who engaged in protected and Bylaw-encouraged conduct, were charged with seeking removal. This inversion — punishing protected conduct while removing a member for harmful conduct — is the definition of selective and discriminatory enforcement.
- **NOTE ON ETHICS COMMITTEE BYPASS — DRAIN CASE:** The December 2 minutes do not reference any Ethics Committee process for Drain's removal. If the EC bypassed the Ethics Committee for Drain (whose conduct was unambiguously a Standards of Conduct violation) while also bypassing it for the eight members (whose conduct was protected), this further demonstrates that the Ethics Committee exclusivity requirement was systematically ignored — not merely in the 8-member case.

REMEDY: Chair Carey should be referred to the Ethics Committee for: (1) bad faith directing then charging members for contacting authorities (Art. I §7.B); (2) use of derogatory language toward a member (Art. I §7.C); (3) selective enforcement — pursuing eight members while evading his own adjudicated ethics violation; (4) hiring and directing the presiding parliamentarian. The CCC may also consider removal of the Chair under Art. II §6(C) for cause.

Violation Category 10: Secretary and Treasurer Participation Violations

Respondents: Secretary Emily Swanson; Treasurer Karl Jurek

10.1 Secretary Swanson

Emily Swanson committed the following violations:

- **DECEPTIVE MEETING NOTICES:** Swanson's January 6 call described the meeting purpose as 'caucus preparations' when the actual substantive business was an executive session vote on charges against eight members. Members are entitled to accurate notice of meeting business to decide whether to attend and to prepare.
- **FAILURE TO ASSUME CHAIR:** When Vice Chair Montes left and Chair Carey vacated the chair at trial, Secretary Swanson was present and should have assumed the chair per Art. III §5(A). Her failure to do so allowed an unauthorized non-officer (Glad) to preside.
- **PARTICIPATION AS OFFICER OF THE CHARGING BODY:** Swanson, as Secretary, is an officer of the EC and participated in the EC's actions that brought charges. RONR's fairness principles require officers who are part of the prosecuting body to recuse from presiding functions.

10.2 Treasurer Jurek

Karl Jurek committed or enabled the following violations:

- **PRESENCE WITHOUT ASSUMING CHAIR:** As Treasurer, Jurek was present at the trial and in the succession chain after Swanson (Art. III §6(A)). His failure to object to Glad presiding — and his participation in deliberations and votes — validated an unlawful proceeding.
- **PROPOSED BYLAW REMOVING DUAL-SIGNATURE REQUIREMENT:** Jurek, as Treasurer, proposed Amendment 3 (Art. III §6.F) removing the dual-signature requirement for disbursements. As the Treasurer who would directly benefit from sole financial authority, this proposal creates a self-serving conflict of interest. The Bylaws Committee Analysis v3 identifies the dual authorization requirement as a primary financial safeguard protecting all members.
- **OFFICER ELECTION CYCLE PROPOSAL:** At the November 8, 2025 EC meeting, Jurek announced he would submit a bylaw to separate officer election cycles to 'maintain continuity of leadership.' This proposal, if advanced, would insulate current officers from replacement — a governance interest Jurek has as a sitting officer.

REMEDY: Swanson should be formally advised that her January 6 meeting notice was deceptive and that she was obligated to assume the chair at trial. Jurek's proposed Bylaw Proposal 3 should be rejected as creating a conflict of interest. The CCC should review whether either officer's conduct rises to the level of a Standards of Conduct referral to the Ethics Committee.

Violation Category 11: Anticipated Governance Power-Shift — Proposed Bylaw Amendments

Respondents: Chair Mike Carey; Treasurer Karl Jurek (anticipated, if proposals are adopted)

11.1 Overview

Chair Carey has submitted four proposed Bylaw amendments to the Bylaws Committee. The Bylaws Committee Analysis (v3, April 13, 2025) identified significant concerns with Proposals 1, 2, and 3. This section documents the governance-shift violations that would result if these proposals are adopted in their current form.

11.2 Proposal 2 — Binding Bylaw Interpretation (Art. IV §3.A.13) — CRITICAL

This proposal would grant the Executive Committee 'sole authority to issue a binding interpretive determination' on any Bylaw ambiguity or conflict. Interpretations would remain binding unless superseded by a formal CCC amendment.

This violates or conflicts with:

- Art. II §6(A): 'The County Central Committee is the governing body of the Party.' Interpretation of governing documents is a fundamental act of governance. RONR §56:68 confirms that the authoritative interpreter is the assembly itself — the CCC.
- Art. XII (Amendment): Bylaw amendments require a 2/3 vote of the CCC with 20% quorum and 14-day notice. A 'binding' EC interpretation that displaces Bylaw language until formally amended by the CCC effectively allows a simple EC majority to amend the Bylaws at a lower threshold than the Constitution requires.
- Pattern of Conduct: This proposal is submitted in the same governance environment where the Chair used a parliamentarian's rulings to bypass the Ethics Committee, override the succession chain, and conduct unlawful trials. Granting the EC 'sole authority' to interpret the Bylaws would create a permanent mechanism for the same conduct — future determinations that the Ethics Committee exclusivity clause does not apply, that the succession chain permits exceptions, or that discipline can proceed under RONR without Bylaw process.

11.3 Proposal 3 — Removal of Dual-Signature Requirement (Art. III §6.F) — SERIOUS

This proposal removes the requirement for a second officer's co-signature on party disbursements, replacing it with language authorizing the Treasurer to 'authorize and execute (or cause to be executed)' all payments unilaterally. The Bylaws Committee Analysis identifies dual authorization as a 'primary safeguard against error and misappropriation.'

- Proposed by the Treasurer himself — a direct self-interest conflict;
- Submitted in an environment where litigation has been threatened and a records retention policy is simultaneously proposed — removing financial oversight at the moment oversight is most needed;
- The Bylaws Committee Analysis confirms that most business banking platforms support dual-approval workflows for electronic transactions, undermining the stated justification.

11.4 Proposal 1 — Records Retention Without Litigation Hold — SERIOUS

Proposal 1 grants the EC sole authority to adopt an annual records retention policy, with no minimum retention standards and — critically — no mandatory litigation hold provision. The Bylaws Committee Analysis (citing *Moss v. Parr Waddoups Brown Gee & Loveless*, 2012 UT 42) notes that the duty to preserve records attaches when litigation is 'reasonably anticipated.' Given the multiple legal threats already made, adopting a records retention policy without a litigation hold provision exposes individual officers and the Party to spoliation sanctions.

11.5 Proper Process for Bylaw Amendments

Even if the substance of these proposals were appropriate, the process violated Bylaw requirements:

- Art. XII §1.B requires 14-day advance notice before CCC vote on amendments;
- The Bylaws Committee Analysis notes that the proposals were 'received by the committee yesterday' as of its April 13, 2025 writing — suggesting the proposals were submitted with inadequate review time;
- The Bylaws Committee recommended tabling all four proposals for at least 30 days of review before any vote.

REMEDY: The Bylaws Committee should recommend that the CCC: (1) reject Proposal 2 as submitted — it unconstitutionally shifts CCC governance authority to the EC and creates a mechanism for de facto Bylaw amendment by EC majority; (2) reject Proposal 3 as submitted — it removes a critical financial safeguard under a self-interested proposal by the Treasurer; (3) require that Proposal 1 be amended to include a mandatory litigation hold provision before the CCC considers it; (4) adopt the Bylaws Committee substitute language for each proposal rather than the versions submitted by Carey. Minority reports are available to any committee member who disagrees.

Violation Category 12: Failure to Call Petitioned Special CCC Meeting (May 2026)

Respondents: Chair Mike Carey (primary)

12.1 Rule(s) Violated

RONR §9:13: Members have the right to call a special meeting of the assembly by petition of the required number of members.

RONR §9:14: When a petition for a special meeting is properly submitted, the chair is obligated to call the meeting within the time specified in the bylaws or standing rules.

SLCoGOP Bylaws Art. II §8(B)(5): Provides the mechanism for members to petition for a special meeting of the County Central Committee.

12.2 Specific Conduct

In May 2026, SLCoGOP members submitted a formal petition requesting a special meeting of the County Central Committee (CCC). The petition cited Art. II §8(B)(5) and RONR §§9:13-14. The petitioners sought to have the CCC address the violations documented in this register — including the vacating of the February 9-10, 2026 trial verdicts — at a properly convened CCC meeting with appropriate advance notice.

Instead of calling the petitioned special meeting, Chair Carey folded the subject matter into the regular May 30, 2026 County Central Committee meeting (CCM_Call_20260530.pdf; CCM_Agenda_20260530.pdf). The petitioners formally objected to this substitution, contending that:

- The petition specifically requested a special meeting, not placement on the agenda of a regular meeting;
- A special CCC meeting requires its own notice under RONR and the Bylaws, with the full 14-day (or applicable) advance notice specifying the special meeting's purpose;
- Folding contested items into a regular CCM agenda at the chair's discretion bypasses the procedural protections a properly noticed special meeting provides;
- The May 30 CCM notice did not provide adequate advance notice for members to prepare to address the substantive violations questions raised in the petition (Halvorsen Notice and Reply, May 19, 2026: HalvorsenNotice_FailureToCallMeeting_20260519.pdf; SandersonNotice_FailureToCallMeeting_20260519.pdf; HalvorsenReply_FailureToCallMeeting_20260519.pdf).

12.3 Why This Constitutes a Separate Violation

The failure to call the petitioned special meeting is a standalone violation, separate from the underlying trial violations, for two reasons:

First, the right to petition for a special meeting is a fundamental membership right under RONR and the Bylaws. A chair who substitutes his own discretionary agenda decision for a properly-filed petition effectively nullifies the membership's right to convene the governing body on urgent matters — concentrating agenda authority in the Chair when it belongs to the full membership acting through petition.

Second, the context of this refusal is directly relevant to the trial violations. The petition sought a special meeting specifically to address the removal of elected members without proper process. Folding the petitioned business into the regular CCM — controlled by the same Chair whose conduct is under review — creates a structural conflict of interest in which Carey both controls the agenda and is a subject of the petition's concerns.

REMEDY: Chair Carey should comply with Art. II §8(B)(5) and RONR §§9:13-14 and call the petitioned special CCC meeting with proper notice, separate from the regular CCM. The special meeting notice must specify the petitioners' stated purpose and provide the full required advance notice. Any attempt to again fold the petitioned business into a regular meeting without the petitioners' consent should be treated as a continuing violation of member rights.

IV. Information Gaps and Areas Requiring Strengthening

The following areas would benefit from additional documentation or information to fully substantiate the violations above:

10. QUORUM VERIFICATION — FEBRUARY 9-10 TRIALS: The exact number of EC members present and voting at each stage of the trial must be formally verified against the EC roll. If fewer than 16 members were present, all removal/disciplinary votes are void under Art. IV §1(E)(2). Request: Obtain official meeting minutes and roll call records from Secretary Swanson.
11. SANDERSON VERDICT VOTE COUNT: The Kaye Sanderson punishment letter (CONFIRMED IN-HAND — RONR_HearingVerdict_Sanderson.pdf) confirms the findings and severe penalties but does not disclose the full vote count. Given that Sanderson was tried in absentia, the complete vote record should be obtained to verify quorum and 2/3 majority compliance. The punishment letter itself is now confirmed evidence.
12. ETHICS COMMITTEE RECORDS — CAREY VIOLATION: The KirbyGlad complaint references a January 6 executive session finding that Chair Carey himself violated ethics. The Ethics Committee's written report on that finding has not been located in the current document set. This report would directly support the selective enforcement argument in Violation Category 9.
13. SEPTEMBER 2, 2025 EC MEETING MINUTES: The minutes of the meeting at which the unauthorized municipal endorsement was voted on would confirm the scope of EC members who participated in the original unlawful act — and who therefore had a direct interest in silencing members who reported it.
14. OCTOBER 7, 2025 MINUTES: The October 7, 2025 minutes (Minutes 10-07-25.pdf) were not fully reviewed. These may document interim actions between the September 5 letter and the December emergency meeting.
15. GLADWIN COMPENSATION DOCUMENTATION: The Kirby Glad complaint references compensation 'via payment in kind.' Documentation of this compensation arrangement would strengthen the conflict-of-interest finding in Violation Category 5.
16. FULL TRIAL TRANSCRIPT — LAUREL FETZER/OTHERS: The available trial summary covers Cathy Duke's trial. Full transcripts or summaries of the Fetzer, Sanderson, and other defendants' trials — including vote counts, statements by Carey and Glad — would complete the evidentiary record.
17. STATE REPUBLICAN PARTY RULES: Whether Carey's actions also violated the Utah State Republican Party Constitution or rules should be assessed. Art. XI §3 references 'properly adopted rules' as the second tier; State Party rules may impose additional requirements.
 - SEPTEMBER 2, 2025 EC MEETING MINUTES — HIGH PRIORITY GAP: The minutes of the meeting at which the unauthorized municipal endorsement vote was taken have not been confirmed in the document set. These minutes would confirm: (a) which EC members participated in and voted for the unauthorized endorsement; (b) whether any member objected; (c) the exact motion language. EC members who voted for the endorsement had a direct conflict of interest in later voting on charges against members who reported that endorsement.
 - DECEMBER 16, 2025 MINUTES — CONFIRMED: Official minutes from this meeting have been obtained (EC_Minutes_20251216.pdf). Content is integrated into Violation Category 3, Section 3.2.5 above.

- JANUARY 6, 2026 MINUTES — CONFIRMED: Official minutes have been obtained (EC_Minutes_20260106.pdf). Confirm 2/3 charging vote, all 8 defendants named, Glad as parliamentarian, Brinton as SD9 Chair. Integrated into Violation Category 3, Section 3.3.
- ETHICS COMMITTEE REPORT ON CAREY VIOLATION — OUTSTANDING: The Kirby Glad complaint references a January 6, 2026 executive session at which the Ethics Committee reported a finding that Chair Carey himself violated ethics. The written Ethics Committee report on that finding has not been obtained. This report is critical to the selective enforcement argument in Violation Category 9.
- GLADWIN COMPENSATION DOCUMENTATION — OUTSTANDING: The Kirby Glad complaint references Glad was compensated 'via payment in kind.' Documentation of this arrangement (contract, exchange, or acknowledgment) would strengthen the conflict-of-interest analysis in Violation Category 5.
- CASEY GALE AND TRACIE HALVORSEN ETHICS COMPLAINTS AGAINST CAREY — CONFIRMED: Formal Ethics Committee complaints against Chair Carey were filed by Casey Gale (November 6, 2025) and Tracie Halvorsen (November 13, 2025) alleging selective enforcement and Standards of Conduct violations. Both are now in the document set (CORRESPONDENCE/). These documents directly support Violation Category 9 and demonstrate the selective enforcement pattern.

IV-B. Evidence Inventory — Confirmed In-Hand

The following documents are confirmed in-hand and support the violation categories identified in Section III. Reference IDs are keyed to the violations they support.

E-01 | Email #8, Carey to Halvorsen, Sep. 3, 2025, 9:34 AM | Carey directs Halvorsen to call Murray PD; hostile language quoted verbatim; CC to Montes, Jurek, Swanson | Categories 1, 2, 9

E-02 | Full Halvorsen/Carey email thread (Sep. 1 – Oct. 17, 2025) | Complete record of Carey/Halvorsen dispute preceding charges | Categories 1, 2, 9

E-03 | Carey Feb. 6, 2026 email to 50+ recipients | Pre-trial consultation with Glad confirmed ("We have consulted..."); also a confidentiality violation (non-EC recipients) | Categories 5, 8

E-04 | Vice Chair Montes letter, Feb. 5, 2026 | CONFIRMED in-hand. Reply-all to full EC, Feb. 5, 2026, 3:06 PM. Verbatim: "This hearing is a serious mistake, and insurance likely won't protect us if the action is unlawful." | Categories 5, 6, 9

E-05 | Charging documents (all 8 defendants) | Standards of Conduct framed as RONR §61:3 charges; criminal statute citation; "maliciously and frivolously" language | Categories 2, 4, 9

E-06 | October 7, 2025 EC minutes | Confirms Brinton as SD9 District Chair (role 1) and voting EC member (role 2) | Category 3

E-07 | December 2, 2025 EC minutes | Brinton present; Drain removed for social media (selective prosecution precedent); Dec. 16 meeting explicitly called for Sanderson/Fetzer proceedings | Categories 3, 9

E-08 | December 16, 2025 EC minutes (CONFIRMED) | 5 on-record violations: notice POO overruled; exec-session POO overruled; Sanderson/Fetzer/counsel departed; recording suppressed after passing; EC self-acknowledged defective notice (30-day motion) | Category 3

E-09 | January 6, 2026 EC minutes (CONFIRMED) | 2/3 majority charging vote; all 8 defendants named; Brinton listed as SD9 Chair + voting EC member; Kirby Gladwin as parliamentarian | Categories 3, 5

E-10 | Kaye Sanderson punishment letter, Feb. 18, 2026 (CONFIRMED in-hand) | Signed by Carey alone; penalties: removal + barred through May 1, 2030 + censure on party website | Category 7

E-11 | Casey Gale formal ethics complaint vs. Carey, Nov. 6, 2025 | Formal complaint to ethics@slcogop.com; iMessage screenshots: "go fuck yourself, Casey," "You're a scumbag," "Lawyer up, fucker" | Category 9

E-12 | Tracie Halvorsen Ethics Committee letter, Nov. 13, 2025 | Documents Carey's public language violations; "domestic terrorists" quote; filed before charging vote | Category 9

E-13 | Halvorsen formal charges (Jan. 6, 2026) | Ethics Committee Nov. 24, 2025 report attached — recommended censure only; Carey escalated to full removal without authority | Categories 2, 9

E-14 | KirbyGlad_Complaint_signed.pdf (NAP complaint, filed April 30, 2026) | 28-page NAP complaint; documents compensation "via payment in kind"; SD22 chair removal; 15 violations across 4 meetings | Categories 5, 7

E-15 | Sanderson/Halvorsen Notices — Failure to Call Meeting, May 19, 2026 | Three documents; petitioners' objections to Carey folding petition into regular CCM agenda | Category 12

T-01 | Trial transcript D-001 | Succession chain violation stated on record | Category 5

T-02 | Trial transcript D-002 | Bylaws hierarchy correctly stated; overruled by presiding officer | Category 4

T-03 | Trial transcript D-003 | Criminal statute charge cross-referenced to "not criminal" ruling | Category 4

T-04 | Trial transcript D-101 | EC member states: "the ethics committee was never involved in this" | Category 2

T-05 | Trial transcript D-105 | Wrong quorum threshold (12 cited, 16 required); no roll call confirmed | Category 7

T-06 | Cathy Duke trial summary (Trial_CathyDuke.docx) | Vote counts confirming quorum failure; confidentiality promise on record; indemnification assurance on record | Categories 6, 7, 8

T-07 | January 6, 2026 transcript | Carey admits Dec. 16 defects; Sanderson cleared; Carey ethics finding confirmed | Categories 3, 9

P-01 | Carey public X post (public record) | EC report attached; all 8 defendants named with charges and penalties | Categories 1, 8

OUTSTANDING DOCUMENTS (High Priority)

GAP-01 | September 2, 2025 EC meeting minutes | Documents unauthorized endorsement vote; identifies EC members with self-interest in trial outcome | Categories 1, 6 | HIGH

GAP-02 | Ethics Committee report on Carey's own violation (Jan. 6 executive session) | Written report not yet located; critical to selective enforcement argument | Category 9 | HIGH

GAP-03 | Kirby Glad compensation documentation | "Payment in kind" referenced in NAP complaint; documents financial relationship | Category 5 | MEDIUM

GAP-04 | Full Halvorsen/Carey email thread (Emails #1–7 and #9–end) | Email #8 confirmed; complete thread Sep. 1 – Oct. 17, 2025 still needed | Categories 1, 9 | MEDIUM

GAP-05 | Neil Sebring co-signing document | Confirms Sebring's identical conduct to 8 defendants — selective prosecution | Category 9 | MEDIUM

V. Comprehensive Recommended Remedies

The following remedies are available under the Bylaws and RONR, organized from immediate to structural:

A. Immediate Actions (County Central Committee or EC)

18. Vacate all trial verdicts and penalties from the February 9-10, 2026 trials as having been conducted in violation of: Ethics Committee exclusivity (Art. V §3(D)(2)), improper presiding authority (Art. III succession), inadequate notice (RONR 63:21), denial of counsel (RONR 63:30), lack of impartial tribunal (RONR 63:13), and quorum uncertainty (Art. IV §1(E)(2)).
19. Declare the September 2, 2025 municipal endorsement null and void as exceeding authority under Art. XI §4. Direct the Ethics Committee to assess whether any further action is warranted.
20. Require the Chair to retract the publicly-posted X (Twitter) statement about trial outcomes as a violation of confidentiality under RONR and Art. V §3(D)(10).
21. Retract Carey's February 18, 2026 punishment letter to Kaye Sanderson, which was issued unilaterally and without proper EC authority, and rescind the public censure posted to the website.

B. Ethics Committee Referrals

22. Refer Chair Mike Carey to the Ethics Committee for: bad faith directing then charging members for the same act; use of derogatory language (Sept. 3 email); selective enforcement; and hiring then directing the presiding parliamentarian.
23. Direct the Ethics Committee to complete the investigation of Carey's own ethics violation (confirmed at January 6 executive session) and make a formal recommendation to the EC.

C. CCC Actions

24. The CCC, as governing body (Art. II §6(A)), should adopt a formal resolution declaring the September 2 endorsement and all derivative disciplinary actions void.
25. The CCC may consider removal of Chair Carey for cause under Art. II §6(C) by 2/3 vote with 20% quorum, after Ethics Committee process is completed.
26. Reject Bylaw Proposals 1, 2, and 3 as submitted by Chair Carey. Direct the Bylaws Committee to prepare substitute language consistent with the April 13, 2025 Committee Analysis v3 for CCC consideration.
27. Adopt a formal resolution clarifying that Art. XI §4 limits party endorsements to convention nominees only, and that no EC action can authorize endorsements beyond that scope.

D. State Party and External Actions

28. Escalate this violations register to the Utah Republican Party State Central Committee for review of whether Chair Carey's actions violate the State Party Constitution or threaten the Party's charter.
29. The NAP complaint against Parliamentarian Kirby Glad (filed April 30, 2026) documents 15 violations across four meetings and should be supported with this violations register as corroborating evidence.
30. Individual affected members (Fetzer, Sanderson, Duke, et al.) should consult with legal counsel regarding the viability of a civil action for breach of fiduciary duty, breach of contract (party membership agreement), or tortious interference with political rights, given the multiple procedural violations documented above.

VI. Certification and Attestation

This register has been prepared based on a comprehensive review of the following primary sources located in the SLCoGOP subdirectory and provided by members:

- SLCoGOP Bylaws (Amended August 21, 2025)
- RONR 12th Edition (Roberts-Rules-of-Order-Newly-Revised-12th-Edt.pdf)
- KirbyGlad_Complaint_signed.pdf (28-page NAP complaint, filed April 30, 2026)
- EC Minutes November 8, 2025; December 2, 2025; Agenda January 6, 2026
- Packet-1 through Packet-5 (Charging Documents, Halvorsen Correspondence, etc.)
- Procedures of Unlawful Removal FINAL Fetzer Sanderson Violations.pdf (Attorney Natalie Clawson, Utah Bar #9672)
- Trial_CathyDuke.docx (Trial Summary)
- UnjustGovernanceReview.pdf (Trial Governance Discrepancy Register)
- LaurelFetzer_Audio Transcripts (Ex meeting copy series; EC meeting public session copy series)
- Email: Re Salt Lake County Republican Party Notice of Charges and Trial (Feb. 6, 2026 chain)
- Email: September 3, 2025 Carey to Halvorsen (09.03.2025 email PDF)
- SLCoGOP Bylaws Committee Analysis v3 (April 13, 2025)
- Proposed Bylaw Changes 1-3.docx and 4.docx
- 03 Kaye Sanderson - RONR Hearing Verdict.pdf (February 18, 2026)
- Fwd Notice of unlawful procedures (Laurel Fetzer, December 16, 2025, Attorney Clawson signed document)
- Fwd Emergency EC meeting correspondence (December 4-5, 2025)
- EC_Minutes_20251216.pdf — December 16, 2025 Emergency EC Meeting Minutes (CONFIRMED)
- EC_Minutes_20260106.pdf — January 6, 2026 EC Meeting Minutes (CONFIRMED)
- Halvorsen_Charges_20260106.pdf — Formal Charges Filed Against Tracie Halvorsen, January 6, 2026
- Letter_RefusingIllegalTrial_20260209.pdf — Defendants' Refusal Letter, February 5, 2026; Carey's Reply February 6, 2026
- RONR_HearingVerdict_Sanderson.pdf — Kaye Sanderson Punishment Letter, February 18, 2026 (CONFIRMED IN-HAND)
- Fwd Formal Ethics Complaint Against Party Chairman Mike Carey.pdf — Casey Gale Ethics Complaint, November 6, 2025
- Fwd Letter to the Ethics Committee.pdf — Tracie Halvorsen Ethics Complaint, November 13, 2025
- HalvorsenNotice_FailureToCallMeeting_20260519.pdf — Petitioned Special Meeting Notice, May 19, 2026
- SandersonNotice_FailureToCallMeeting_20260519.pdf — Petitioned Special Meeting Notice (Sanderson), May 19, 2026
- HalvorsenReply_FailureToCallMeeting_20260519.pdf — Halvorsen Reply re: Failure to Call Meeting, May 19, 2026
- EC_Minutes_20251202.pdf / EC_Minutes_20251202.docx — December 2, 2025 EC Meeting Minutes (Drain removal; Dec 16 meeting scheduled)

This document is prepared for internal party use, potential submission to the Utah State Republican Party, and to assist legal counsel. It does not constitute legal advice. Members are encouraged to consult independent legal counsel regarding any of the violations documented herein.

Prepared by: S�CoGOP Bylaws Committee Member & County Delegate

Date: May 2026