

SALT LAKE COUNTY REPUBLICAN PARTY

GOVERNANCE VIOLATIONS REGISTER

Unauthorized Endorsement — Disciplinary Proceedings — Trial of February 9–10, 2026

Prepared by SLCoGOP Bylaws Committee Member | Updated May 27, 2026 (v6 — Due process violations added / Charge defects / Swanson-Jurek violations / Bylaw amendments / Remedies) | Internal Use

This document does not constitute legal advice. Bylaws in effect: August 21, 2025. Parliamentary authority: RONR (12th ed.)

PART I — ROOT CAUSE: THE UNAUTHORIZED ENDORSEMENT (September 2, 2025)

Every charge against all eight defendants flows from their response to a single Executive Committee action: the September 2, 2025 endorsement vote for McCay municipal candidates. That endorsement was itself procedurally unauthorized, and members who reported or objected to it were exercising rights expressly protected by the Bylaws.

1.1 The Endorsement Was Outside EC Authority

SLCoGOP Bylaws Art. XI §4 limits party endorsements to convention nominees. Municipal candidates in Utah are non-partisan and never appear on a party convention ballot. Endorsement policy is governed by the County Central Committee (CCC), not the Executive Committee.

▸ *Authority: Bylaws Art. XI §4 (endorsement limited to convention nominees); Art. [CCC governing endorsement policy]*

- Evidence: EC endorsement vote, September 2, 2025 — no CCC authorization on record

1.2 Members Were Expressly Authorized to Report

Bylaws Art. V §3(D)(5) explicitly encourages members to report illegal activities. The root charge against seven of the eight defendants is that they contacted law enforcement or party leadership about the endorsement. This is conduct the Bylaws not only permit — they affirmatively direct it.

▸ *Authority: Bylaws Art. V §3(D)(5) (duty to report illegal activities)*

1.3 Chair Carey Personally Directed Halvorsen to Contact Law Enforcement

In a September 3, 2025 email to Tracie Halvorsen (Email #8 in the Halvorsen/Carey thread), Chair Carey wrote: “if you still believe we are in violation of state law... then you should call the Murray PD today and file a report, because we did it last night after going into executive session.” The email was CC’d to Vice Chair Sarah Montes, Treasurer Karl Jurek, and Secretary Emily Swanson — meaning the entire officer team was on notice of Carey’s directive before charges were ever filed.

Carey then proceeded to charge Halvorsen and seven co-members for doing exactly what he directed — contacting authorities about the endorsement. This is the textbook definition of the invited error doctrine under RONR §63:27: a party who invites or induces another to take an action cannot later use that action as grounds for discipline.

▸ *Authority: RONR (12th ed.) §63:27 (invited error doctrine); Sept. 3, 2025 email, Carey to Halvorsen*

▸ Evidence: Email #8, Carey to Halvorsen, Sep 3, 2025, 9:34 AM — confirmed in-hand (uploaded). From: chair@slcogop.com. CC: vicechair@slcogop.com (Montes), treasurer@slcogop.com (Jurek), secretary@slcogop.com (Swanson)

- Evidence: Full Halvorsen/Carey thread, September 1 – October 17, 2025

Additional context from the same email: Carey characterized Halvorsen’s legitimate governance concerns as a “personal vendetta,” accused her of “hiding behind misinterpreted Utah law,” and closed with: “You got your first win in a while, and you got your scalp.” and “I guess we just wait now for your next threat.” This hostile language was written and transmitted to three officer witnesses (Montes, Jurek, Swanson) on September 3 — five months before Vice Chair Montes wrote her February 5, 2026 warning letter calling the trial “a serious mistake.” Montes’s warning was therefore informed by direct, contemporaneous knowledge of Carey’s conduct and animus toward Halvorsen.

This language — treating lawful governance activity as a threat, framing a bylaw compliance concern as a vendetta — documents the Chair’s animus toward the defendants prior to any formal proceedings.

- *Authority: Bylaws Art. I §7B (good faith obligation of officers)*
- Evidence: Email #8, Carey to Halvorsen, Sep 3, 2025 — direct quotes

PART II — CHAIR’S CONDUCT INDEPENDENTLY BARS THE PROCEEDINGS

Independently of the unauthorized endorsement, Chair Carey’s own conduct at each stage of the proceedings creates multiple grounds for dismissal and raises Standards of Conduct concerns regarding Carey himself.

2.1 Conflict of Interest — RONR §63:1

Carey was a direct adverse party in the underlying endorsement dispute — he made and defended the endorsement. Despite this conflict, Carey:

- Initiated the Ethics Committee complaint against Halvorsen
- Received and held the confidential Ethics Committee report
- Presented charges to the Executive Committee
- Publicly released the confidential Ethics Committee report as an attachment to his X/Twitter post
 - *Authority: RONR (12th ed.) §63:1 (conflict of interest); Bylaws Art. V §3(F)(10) (Ethics Committee confidentiality)*
 - Evidence: Carey’s public X post with EC report attached — public record

2.2 Selective Prosecution

Neil Sebring co-signed the same document as the eight defendants. Sebring was not charged. Selective application of disciplinary provisions is a recognized basis for procedural challenge.

- Evidence: Charging documents; Dec. 2, 2025 EC minutes (Drain removed for social media; Carey’s more extreme conduct unpunished)

2.3 Carey’s Own Conduct Constitutes Standards of Conduct Violations

At minimum three independent Standards of Conduct violations apply to Carey’s conduct during this period:

- The unauthorized endorsement itself — Art. I §7B, §7C (honesty, integrity, following governing documents)
- Refusal to withdraw after written notice of potential legal violation — Art. I §7D (officers in the public eye)
- Public social media attacks on members who raised the concern — Art. I §7B, §7C, §7D
 - *Authority: Bylaws Art. I §7B, §7C, §7D (Standards of Conduct for officers and members)*

These violations were within the exclusive jurisdiction of the Ethics Committee — the same body Carey used as a tool against the eight defendants. Two formal Ethics Committee complaints were in fact filed against Carey during this period: (1) Casey Gale filed a formal complaint on November 6, 2025 (to ethics@slcogop.com), submitting iMessage screenshots in which Carey wrote to a party member: “go fuck yourself, Casey,” “You’re a scumbag,” and “Lawyer up, fucker.” (2) Tracie Halvorsen filed a defense letter to the Ethics Committee on November 13, 2025, which also documented Carey’s extreme public social media conduct as exhibits. Neither complaint against Carey resulted in charges. The Chair who faced documented Standards of Conduct complaints used the Ethics Committee process against members who had complained about him — while his own complaints were shelved.

PART III — CHARGING PROCESS VIOLATIONS

3.1 Mandatory Ethics Committee Process Bypassed for 7 of 8 Defendants

Most charges against defendants are Standards of Conduct violations. Under the Bylaws hierarchy, these charges had to go to the Ethics Committee first — not directly to the Executive Committee. Tracie Halvorsen, the one defendant whose case did go through the Ethics Committee, illustrates a second layer of violation: the Ethics Committee recommended only censure and a request to cease disrespectful conduct. Chair Carey then escalated her case to a full removal trial without Bylaw authority. No provision allows the Chair or EC to exceed the Ethics Committee's recommendation without new cause.

▸ *Authority: Bylaws Art. V §3(F)(2) (Ethics Committee is exclusive point of contact for Standards of Conduct); Art. XI §3 (Bylaws govern first, RONR third)*

- Evidence: Charging documents — charges framed as Standards of Conduct while using RONR §61:3 procedural track
- Evidence: Verbatim transcript (D-101, ~39:06): EC member stated on the record during trial: "the ethics committee was never involved in this. And that is a major issue."

3.2 Wrong Procedural Authority Applied

RONR §61:3 was used to charge members for conduct that is explicitly covered by the Bylaws' own Standards of Conduct process. Under Art. XI §3, Bylaws govern first; RONR applies only where the Bylaws are silent. Using RONR §61:3 for conduct covered by Bylaw provisions directly violates the Bylaws' hierarchy of authority.

▸ *Authority: Bylaws Art. XI §3; RONR (12th ed.) §61:3–4*

PART IV — PRE-TRIAL PROCEDURAL VIOLATIONS (Dec 2025 – Feb 2026)

4.1 December 2, 2025 — Triple Conflict: Mark Brinton

At the December 2 meeting, Mark Brinton served simultaneously as: (1) SD9 District Chair and (2) voting Executive Committee member. This dual role creates an inherent conflict — Brinton participated in the December 2 and January 6 charging deliberations as both a district representative and a voting member, then voted against all eight defendants at the February trial. Note: a third role (acting parliamentarian at December 2) was previously noted; this is NOT confirmed in reviewed minutes and remains unconfirmed pending transcript review.

- Evidence: October 7, 2025 EC minutes — CONFIRMED in-hand (uploaded May 2026). Confirms roles 1 (SD9 District Chair) and 2 (voting EC member). Role 3 (acting parliamentarian at Dec. 2 meeting) requires transcript confirmation.
- Evidence: December 2, 2025 EC minutes — CONFIRMED in-hand. Brinton present as SD9 Chair + voting EC member. Christian Drain removed at this same meeting for social media posts (see Section 2.2).

4.2 December 16, 2025 — Emergency Meeting / Procedural Defects

The December 16, 2025 emergency meeting minutes (confirmed in-hand) document five distinct procedural violations on the official record: (1) Vasic's point of order that proper notice was not given — overruled; (2) Fetzer's point of order that the meeting opened directly into executive session without a motion per RONR §9:24 — overruled; (3) Sanderson, Fetzer, and their legal counsel left after objections were overruled; (4) A motion to record the meeting passed, then was immediately recalled — suppressing an already-authorized recording; (5) The EC passed a motion to "continue the meeting with at least 30 days notice given" — a formal on-record acknowledgment of defective notice. Chair Carey subsequently admitted further defects at the January 6 meeting. The December 2 minutes confirm December 16 was called specifically to advance proceedings against Sanderson and Fetzer.

- Evidence: December 16, 2025 EC minutes — CONFIRMED in-hand (workspace). On-record: Vasic point of order overruled; Fetzer exec-session point of order overruled; recording motion recalled; EC self-acknowledged defective notice by passing 30-day continuation motion.
- Evidence: January 6, 2026 meeting transcript — Carey

- admission on record
- Evidence: January 6, 2026 EC minutes — CONFIRMED in-hand (workspace). Confirms 2/3 majority charging vote; all 8 defendants named; Brinton present as SD9 Chair (voting member).
- Evidence: December 16 emergency meeting documentation [NEEDED — see Section IX]

4.3 January 6, 2026 — Kaye Sanderson Cleared, Carey Violation Confirmed

The January 6 meeting simultaneously cleared Kaye Sanderson of an ethics complaint and confirmed an ethics violation by Chair Carey himself. Proceeding to trial against Sanderson and co-defendants while Carey carried a confirmed ethics finding represents a fundamental asymmetry in the application of party standards.

- Evidence: January 6, 2026 transcript (confirmed in prior session analysis)

4.4 February 6, 2026 — Pre-Formed Conclusion Email

Two days before the trial, Chair Carey emailed 50+ recipients confirming: "We have consulted with legal counsel and a parliamentarian on the process." This pre-trial consultation with the very parliamentarian (Kirby Glad) who would preside over the trial established pre-formed conclusions before evidence was heard.

- *Authority: RONR (12th ed.) §§63:1, 63:22 (impartiality requirements for presiding officers)*
- Evidence: Carey Feb. 6 email to 50+ recipients — confirmed in prior analysis

4.5 February 5, 2026 — Vice Chair's Written Warning

Vice Chair Sarah Montes sent a reply-all to the full Executive Committee on February 5, 2026 at 3:06 PM — not a private note to Carey, but a contemporaneous on-record warning to every officer and EC member. She wrote verbatim: "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." This is the party's second-ranking officer, on the record, warning the full EC of legal exposure four days before the trial proceeded anyway.

- Evidence: Montes letter, February 5, 2026 [NEEDED — see Section IX]

4.6 January 6, 2026 — Deceptive Meeting Call / Surprise Charging Vote

Secretary Emily Swanson's official call to the January 6, 2026 EC meeting described its purpose as "caucus preparations." The meeting's actual substantive business — voting to prefer formal charges against eight members and scheduling their trials — was not disclosed in the call. Members are entitled to accurate notice of meeting business in order to prepare and decide whether to attend. The January 6 minutes confirm charges were preferred by a 2/3 majority vote, with Kirby Gladwin serving as parliamentarian ruling on objections. This surprise charging vote, combined with the deceptive meeting call, denied the accused and other EC members the opportunity to prepare a response or raise informed objections.

- *Authority: RONR (12th ed.) §§63:21, 63:28 (notice requirements); Bylaws Art. XI §3*
- Evidence: January 6, 2026 EC minutes — CONFIRMED in-hand. Official call described as "caucus preparations"; actual business was charging vote against 8 members. • Evidence: Secretary Swanson's Jan. 6 meeting call email — confirmed in prior analysis.

PART V — TRIAL VIOLATIONS (February 9–10, 2026)

5.1 Parliamentarian Kirby Glad — Structural Conflicts (4 simultaneous roles)

Kirby Glad, PRP simultaneously served as:

- Paid parliamentarian to Chair Carey (employment relationship with the chair)
- Chair Pro Tem / presiding officer — in violation of the Bylaw succession chain
- Sole adjudicator of all procedural objections raised by defendants
- Having pre-validated the proceedings before the trial began (per Carey's Feb. 6 email)

No individual can objectively adjudicate challenges to proceedings they were engaged to design and pre-approve. An additional concern regarding Glad's installation as Chair Pro Tem has been raised by defendant Kaye Sanderson: Montes left the hearing before Carey stepped down, and before EC members Emily Swanson and Karl Jurek were asked to chair. Kirby Glad was then installed as Chair Pro Tem. Sanderson has stated: "I believe it was all planned ahead of time to get Kirby in." If accurate, this would mean Glad's installation was pre-arranged rather than arising from the natural succession chain — compounding the conflict of interest violations already documented.

- *Authority: NAP Standards of Ethical Conduct §§2, 3, 4; Bylaws succession chain (succession to presiding officer)*
- Evidence: Carey Feb. 6 email confirming Glad's pre-trial consultation; trial transcript D-001 (succession chain violation stated on record)

5.2 Wrong Quorum Threshold Applied and Quorum Failure Confirmed

Bylaws Art. IV §3(B) requires a minimum quorum of 2/3 of Executive Committee members for removals and censures — 16 members. During the trial, a quorum count of "13 in attendance" was announced, and 12 was cited as sufficient. This is the wrong threshold.

Vote counts confirm the failure:

- Charge #1 guilty verdict: 13 guilty, 1 not guilty = 14 votes cast
- Penalty vote: 14 in favor, 1 opposed = 15 votes cast
- Adding Cathy Duke (excluded as defendant): 15 people present maximum during guilt vote
- Required: 16 members. Quorum failure on the guilt vote is confirmed.
- As subsequent trials proceeded and members left, quorum failures in later trials are mathematically certain.
 - *Authority: Bylaws Art. IV §3(B) (2/3 quorum for removals); RONR (12th ed.) §40 (quorum requirements)*
 - Evidence: Verbatim transcript D-105 (wrong threshold applied and announced); Cathy Duke trial vote counts

5.3 No Roll Call — Quorum Cannot Be Verified

No roll call was taken. Without a roll call, the quorum count cannot be independently verified against the required threshold, and the record is insufficient to establish that the elevated 2/3 quorum was ever properly confirmed.

- *Authority: RONR (12th ed.) §§40, 47 (roll call requirements for quorum verification)*
- Evidence: Transcript D-105 (no roll call confirmed); D/7.5

5.4 On-Record Promise of Confidentiality — Broken Within 24 Hours

During the trial, Speaker 18 stated explicitly on the record: "No public announcement will be made and it will not be spread on social media." Parliamentarian Glad confirmed this assurance. Cathy Duke was told she could still participate in caucus.

Within 24 hours:

- Chair Carey posted publicly on X/Twitter naming all eight defendants, their charges, and their penalties
- A county-wide email was sent to all Party members with the same information

This is an on-record broken promise made by the presiding officer's parliamentary authority to the defendants during their own trial.

- *Authority: RONR (12th ed.) §63 (good faith obligations); Bylaws Art. V §3(F)(10) (strict confidentiality of Ethics Committee findings)*
- Evidence: Verbatim trial transcript — Speaker 18 statement and Glad confirmation; Carey X post and county email (public record)

5.5 Mid-Trial Indemnification Vote Before Penalties Imposed

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 compromised when the voting members have been indemnified against liability for their votes before those votes are cast.

- Evidence: Cathy Duke trial summary (confirmed in prior session analysis)

5.6 Bar Complaint Filed Against Defense Counsel

A bar complaint was filed against the defendants' legal counsel during or after the trial proceedings. This is documented in the trial procedures record and raises serious questions about the use of external legal processes to impede the defendants' representation.

- Evidence: Trial procedures document (TrialProcedures — confirmed in prior session analysis)

5.7 RONR Overrides Bylaws Ruling — On the Record

A member stated correctly on the record: "Emily is who is supposed to, according to our bylaws, which trumps Robert's Rules of Order." The presiding officer overrode this correct statement. The correct answer to a point of order was stated on the record and rejected.

- Authority: *Bylaws Art. XI §3 (Bylaws govern first)*
- Evidence: Verbatim transcript D-002

5.8 Charges Reference Criminal Statute — Ruling Says 'Not Criminal'

Charging documents cite a criminal statute as the basis for at least one charge. The trial ruling explicitly states the conduct was "not criminal." A charge predicated on a criminal statute cannot be sustained when the finder of fact simultaneously rules the conduct non-criminal.

- Evidence: Cross-reference: Charging documents (D-003) vs. trial ruling language

5.9 Silent Counsel Restriction — RONR 63:30

The December 16, 2025 trial agenda specified "Silent Counsel Only" for the accused. RONR 63:30 guarantees an accused the right to be "represented by counsel" who may speak in their defense. The Bylaws are silent on trial counsel; therefore RONR 63:30 controls (Bylaws Art. XI §3). Restricting defense counsel to complete silence is a direct violation of this guarantee.

- Authority: RONR (12th ed.) §63:30 (right to speaking counsel); Bylaws Art. XI §3
- Evidence: December 16, 2025 agenda (Packet-1) — "Silent Counsel Only" specified in writing

5.10 No Prior Investigation — RONR 63:7

RONR 63:7 requires an investigation committee before charges are brought where a matter may be delicate, lengthy, or involve scandal. Trials of eight members on allegations that included reports to the FBI, the US Attorney General, and multiple city attorneys are self-evidently delicate and scandalous. No investigation committee was formed, no witnesses were interviewed in advance, and no investigation report was presented to the EC before charges were voted on January 6, 2026.

- Authority: RONR (12th ed.) §63:7 (investigation committee required before trial in delicate/scandalous matters)
- Evidence: Charging documents — no reference to any prior investigation; trial transcript confirms no investigation report

5.11 Surprise Evidence Introduced at Trial

Evidence and allegations beyond those stated in the written charging documents were introduced at trial. Defense counsel and other defendants objected on the record to this "surprise evidence." RONR's notice and fairness principles require that the accused have advance notice of all evidence to be used against them so they may prepare a response. Introducing evidence not referenced in the charging documents denies that opportunity.

- ▶ Authority: RONR (12th ed.) §§63:24–25 (notice of specific charges); §63:28 (notice requirements); good faith principles
- Evidence: Trial Governance Review Discrepancy D-103 — objections to surprise evidence on the record

5.12 Structural Jury Conflict — EC as Endorser, Charger, and Juror

The Executive Committee simultaneously served as: (a) the body that approved the unauthorized September 2 endorsement; (b) the charging body that voted charges on January 6; (c) the body that prosecuted the case through Carey as manager; (d) the jury that rendered guilt verdicts; and (e) the body that imposed penalties. EC members voted on guilt in a case where they had a direct personal stake as participants in the original unlawful endorsement. RONR 63:13 requires a trial committee to be impartial. The EC's structural self-interest as the original endorsing body disqualifies it as an impartial tribunal.

- ▶ Authority: RONR (12th ed.) §63:13 (impartial tribunal requirement)
- Evidence: September 2, 2025 EC endorsement vote; January 6, 2026 charging vote — same body in both roles

5.13 Kaye Sanderson — Trial in Absentia Without Proper Cumulative Notice

RONR 63:31 permits 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 the meeting). The February 9 trial notice corrected the location, but the cumulative notice failures — defective December 16 notice, deceptive January 6 meeting call, and inadequate preparation time — denied her meaningful preparation time and a fair opportunity to mount a defense.

- ▶ Authority: RONR (12th ed.) §63:31 (trial in absentia — proper notice required); §63:21, §63:28
- Evidence: December 16 notice (location/time missing); January 6 call ("caucus preparations"); February 9 charging documents

5.14 Simultaneous Charging of Multiple Accused Without Joint-Act Basis

The January 6 EC vote preferred charges against eight members simultaneously. RONR 63:12 requires each accused to receive a separate trial unless the charges arise from a joint act in which all participated. While the September 5 letter may supply a joint-act basis for some defendants who co-signed it, not all eight charged members are clearly joint actors in every alleged offense. The simultaneous charging process denied individual members the opportunity to distinguish their specific conduct from that of other defendants.

- ▶ Authority: RONR (12th ed.) §63:12 (separate trial requirement absent joint-act exception)
- Evidence: January 6, 2026 EC minutes — simultaneous charging vote; charging documents for all 8 defendants

PART V-B — CHARGE DOCUMENT VIOLATIONS

5.15 December 16 Notice — Charges Cited Only "Cause" Without Specificity

The December 5, 2025 notice for the December 16 "emergency" meeting (Packet-1) failed to provide any specific charges. The notice cited only "cause" without identifying: (a) which provision of the governing documents was violated; (b) the specific conduct alleged; or (c) any factual specification enabling the accused to prepare a response. RONR 63:24-25 requires that a charge set forth a specific offense citing the particular act or conduct and the rule or provision violated. A notice of "cause" alone does not meet this standard.

- ▶ Authority: RONR (12th ed.) §§63:24–25 (specificity of charges)
- Evidence: December 5, 2025 notice for December 16 meeting (Packet-1 / Figure 7 in Unlawful Removal document)

5.16 January 6 Charges — Subsidiary Authority Cited; Bylaws Hierarchy Violated

The January 6 charges cited RONR §61:3 ("conduct tending to injure the good name of the organization") as the operative disciplinary provision. This is defective on three independent grounds: (1) RONR §61:3 is not a Bylaw provision — the EC may only exercise authority expressly granted by the Bylaws, and the Bylaws grant no removal authority by RONR citation alone; (2) the Bylaws are not silent on discipline — Art. V §3(F)(2) provides

an explicit, complete framework that displaces RONR's general disciplinary provisions (Bylaws Art. XI §3); (3) the charges allege members acted "maliciously and frivolously" — language synonymous with bad faith under Art. I §7B, confirming the charges are Standards-of-Conduct-based and required Ethics Committee intake first.

▸ Authority: Bylaws Art. XI §3 (Bylaws govern first; RONR applies only where Bylaws are silent); Art. V §3(F)(2); RONR (12th ed.) §61:3

● Evidence: January 6, 2026 charging documents — RONR §61:3 cited; "maliciously and frivolously" language

PART VI — POST-TRIAL VIOLATIONS

6.1 Unilateral Penalty Imposition by Chair

The Kaye Sanderson punishment letter (February 18, 2026) shows Chair Carey issuing penalties unilaterally — without a separate EC vote — and directing posting to the Party website. Penalty imposition requires the same body that rendered the verdict; the Chair has no independent authority to issue or publicize penalties.

▸ Authority: RONR (12th ed.) §61 (penalty imposition by the body that tried the case)

● Evidence: Kaye Sanderson punishment letter, February 18, 2026 [NEEDED — see Section IX]

6.2 Public Disclosure in Violation of Confidentiality Obligation

Bylaws Art. V §3(F)(10) requires Ethics Committee findings be kept in strict confidence. Art. V §3(F)(7) requires reports be made privately in closed session. Carey publicly attached the Ethics Committee report to his X post and sent a county-wide email naming all defendants with charges and penalties.

▸ Authority: Bylaws Art. V §3(F)(10); Art. V §3(F)(7)

● Evidence: Carey X post with attached EC report (public record); county-wide email (public record)

6.3 Secretary Swanson — Failure to Assume Chair at Trial

When Vice Chair Montes refused to participate and Chair Carey vacated the chair to serve as prosecution manager, the Bylaw succession chain (Art. III §5(A)) required Secretary Emily Swanson — who was present throughout the trial — to assume the chair. Swanson did not do so. Her failure allowed a non-officer (Parliamentarian Kirby Glad) to be installed as Chair Pro Tem in violation of the express succession chain. Swanson's failure to act constitutes an independent breach of her officer duties under the Bylaws.

▸ Authority: Bylaws Art. III §5(A) (Secretary as acting chair in absence of Chair and Vice Chair)

● Evidence: Trial transcript D-001 — succession chain stated on record; Montes departure confirmed; Swanson presence confirmed throughout trial

6.4 Treasurer Jurek — Participation Without Objection to Unauthorized Proceeding

Treasurer Karl Jurek was present throughout the February 9-10 trial. As the next officer in the succession chain after Secretary Swanson (Art. III §6(A)), Jurek had both the standing and the obligation to object when the chair was passed to a non-officer. His participation in deliberations and votes under an unauthorized presiding officer — without raising the succession chain violation — validated an unlawful proceeding. Jurek's proposed Bylaw Amendment 3 (removing the dual-signature requirement for disbursements) additionally represents a self-serving governance action by a sitting officer with a direct financial interest in the outcome.

▸ Authority: Bylaws Art. III §6(A) (Treasurer as acting chair in absence of all other officers); Art. I §7B (good faith obligation of officers)

● Evidence: Trial transcript — Jurek present throughout; Proposed Bylaw Changes 3.docx (dual-signature removal proposal)

6.5 Secret Ballot Disclosure — Leak From Within the EC

The September 2, 2025 endorsement vote was taken by secret ballot in executive (closed) session. The charging documents (Packet-1) identify which specific Executive Committee members voted not to endorse — information

that could only be known by disclosing the secret ballot results. This means the voting pattern was leaked to Carey's camp from within the EC itself, not from the defendants. This direction-of-leak reversal undermines the premise of the charges against Fetzer and Sanderson (who were charged in part for disclosing how members voted) and constitutes an independent confidentiality violation by whoever within the EC revealed the secret ballot results.

- ▶ Authority: RONR (12th ed.) rules governing executive session confidentiality; secret ballot secrecy
- Evidence: Charging documents (Packet-1) — identify specific voting patterns from a secret ballot vote; Trial summary (Trial_CathyDuke.docx) — "specific voting patterns leaked to claimants" noted on record

6.6 SD22 Chair Position — Unilateral Removal from Leadership Table

Chair Carey unilaterally removed the SD22 chair position from the EC leadership table. Authority to alter the composition of the Executive Committee rests with the County Central Committee (Art. II §6(A)), not with the Chair acting alone. If the SD22 seat was removed to reduce the total EC seat count — thereby lowering the quorum threshold from 16 to a smaller number — this constitutes an unauthorized manipulation of the quorum calculus in advance of a trial whose legitimacy depended on reaching the 2/3 quorum threshold.

- ▶ Authority: Bylaws Art. II §6(A) (CCC is governing body); Art. IV §1 (EC composition defined by Bylaws, not Chair)
- Evidence: KirbyGlad_Complaint_signed.pdf — SD22 removal documented

PART VI-B — ANTICIPATED GOVERNANCE POWER-SHIFT: PROPOSED BYLAW AMENDMENTS

Chair Carey has submitted proposed Bylaw amendments that, if adopted, would lock in the governance imbalances documented in this register. These are not yet violations — they are anticipated violations if adopted without proper process and scrutiny.

A.1 Proposal 2 — Binding EC Bylaw Interpretation (Art. IV §3.A.13) — CRITICAL

Would grant the Executive Committee "sole authority to issue a binding interpretive determination" on any Bylaw ambiguity. Under Art. II §6(A), the County Central Committee is the governing body — authoritative interpretation of governing documents is a CCC function (RONR §56:68). 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 Art. XII requires (2/3 CCC vote with 20% quorum and 14-day notice). In the current governance environment — where a parliamentarian's ruling was used to nullify the Ethics Committee exclusivity clause — this proposal would create a permanent mechanism for the same overreach.

- ▶ Authority: Bylaws Art. II §6(A); Art. XII (amendment requirements); RONR (12th ed.) §56:68
- Evidence: Proposed Bylaw Changes 2.docx; Bylaws Committee Analysis v3 (April 13, 2025)

A.2 Proposal 3 — Removal of Dual-Signature Requirement (Art. III §6.F) — SERIOUS

Would remove the requirement for a second officer's co-signature on party disbursements, authorizing the Treasurer to execute all payments unilaterally. Proposed by the Treasurer himself — a direct self-interest conflict. The Bylaws Committee Analysis (v3) identifies dual authorization as a "primary safeguard against error and misappropriation." This proposal was submitted in an environment where litigation has been threatened and a records retention policy is simultaneously proposed — removing financial oversight at the moment that oversight matters most.

- ▶ Authority: Bylaws Art. III §6(F) (dual-signature requirement); Art. I §7B (good faith, no self-dealing)
- Evidence: Proposed Bylaw Changes 3.docx; Bylaws Committee Analysis v3

A.3 Proposal 1 — Records Retention Without Litigation Hold — SERIOUS

Would grant the EC sole authority to adopt an annual records retention policy with no minimum retention standards and no mandatory litigation hold provision. Given multiple legal threats already made against the Party and its officers, the duty to preserve records has almost certainly attached (*Moss v. Parr Waddoups Brown Gee &*

Loveless, 2012 UT 42). Adopting a destruction-permissive records policy without a litigation hold exposes individual officers and the Party to spoliation sanctions.

- Authority: Bylaws Art. XII; Utah spoliation doctrine (Moss v. Parr, 2012 UT 42)
- Evidence: Proposed Bylaw Changes 1.docx; Bylaws Committee Analysis v3

PART VII — CONSOLIDATED VIOLATIONS MATRIX

#	Violation	Authority	Key Evidence / Source	Status
1	Unauthorized endorsement — root cause	<i>Bylaws Art. XI §4</i>	EC vote Sep. 2, 2025; no CCC auth.	CONFIRMED
2	Invited error — Carey directed Halvorsen to call Murray PD	<i>RONR §63:27</i>	Email #8, Sep. 3, 2025 (attached)	CONFIRMED
3	Chair conflict of interest — adverse party as prosecutor	<i>RONR §63:1</i>	EC report published by Carey	CONFIRMED
4	Selective prosecution (Sebring not charged)	<i>Equal application of Bylaws</i>	Charging documents	STRONG
5	Ethics Committee bypass (7 of 8 defendants)	<i>Bylaws Art. V §3(F)(2); Art. XI §3</i>	Transcript D-101; charging docs	CONFIRMED
6	Wrong procedural authority — RONR over Bylaws	<i>Bylaws Art. XI §3; RONR §61:3</i>	Transcript D-002	CONFIRMED
7	Mark Brinton dual conflict — SD9 Chair + voting EC member (Dec. 2 and Jan. 6 meetings)	<i>Conflict of interest / impartiality</i>	Oct. 7 + Dec. 2 EC minutes (confirmed; roles 1+2 confirmed; role 3 pending transcript)	STRONG
8	Dec. 16 procedural defects — admitted by Carey	<i>RONR procedural requirements</i>	Dec. 16 minutes (recording suppressed; EC self-acknowledged defective notice); Jan. 6 transcript	CONFIRMED
9	Pre-formed conclusions — Glad pre-trial consultation; Feb. 6 email also a confidentiality violation (see #35)	<i>RONR §§63:1, 63:22</i>	Carey Feb. 6 email	CONFIRMED
10	Glad: 4 simultaneous conflicted roles	<i>NAP Ethics §§2, 3, 4</i>	Transcript; Feb. 6 email	CONFIRMED
11	Wrong quorum threshold applied (12 cited, 16 required)	<i>Bylaws Art. IV §3(B)</i>	Transcript D-105	CONFIRMED
12	Quorum failure on guilt vote (15 max vs. 16 required)	<i>Bylaws Art. IV §3(B)</i>	Cathy Duke vote counts	CONFIRMED
13	No roll call — quorum cannot be verified	<i>RONR §§40, 47</i>	Transcript D-105; D/7.5	CONFIRMED
14	On-record confidentiality promise broken within 24 hrs	<i>RONR §63; Bylaws Art. V §3(F)(10)</i>	Trial transcript; Carey X post	CONFIRMED
15	Mid-trial indemnification of voting members	<i>RONR §63 integrity</i>	Cathy Duke trial summary	STRONG

#	Violation	Authority	Key Evidence / Source	Status
16	Bar complaint against defense counsel	<i>RONR §63 / due process</i>	TrialProcedures document	STRONG
17	RONR overrides Bylaws ruling — correct objection rejected	<i>Bylaws Art. XI §3</i>	Transcript D-002	CONFIRMED
18	Criminal statute charge — ruled 'not criminal'	<i>Internal consistency</i>	Charging docs vs. ruling (D-003)	STRONG
19	Unilateral penalty imposition by Chair alone	<i>RONR §61</i>	Sanderson letter, Feb. 18, 2026 — confirmed in-hand	CONFIRMED
20	Public disclosure of confidential EC proceedings	<i>Bylaws Art. V §3(F)(7), (10)</i>	Carey X post; county email	CONFIRMED
21	Recording suppression at Dec. 16 — motion recalled immediately after passing	RONR §9:24; good faith	Dec. 16, 2025 minutes	CONFIRMED
22	Deceptive Jan. 6 meeting call — 'caucus prep' concealed charging vote	RONR §§63:21, 63:28	Jan. 6 minutes; Swanson call email	CONFIRMED
23	Halvorsen Ethics escalation — EC exceeded Ethics Committee recommendation	Bylaws Art. V §3(F)	Ethics Committee report Nov. 24, 2025; Halvorsen charges doc	CONFIRMED
24	Failure to call petitioned CCC meeting (May 2026)	Bylaws Art. II §8(B)(5); RONR §9:13	Sanderson/Halvorsen notices May 19, 2026	CONFIRMED
25	Silent counsel restriction — right to speaking counsel denied	RONR (12th ed.) §63:30	Dec 16 agenda (Packet-1) — "Silent Counsel Only"	CONFIRMED
26	No prior investigation before charges (delicate/scandalous matter)	RONR (12th ed.) §63:7	Charging docs; trial transcript — no investigation report	CONFIRMED
27	Surprise evidence introduced at trial beyond charging documents	RONR §§63:24–25, 63:28	Trial Governance Review D-103 — on-record objection	STRONG
28	Structural jury conflict — EC as endorser, charger, and juror	RONR (12th ed.) §63:13	Sep. 2 endorsement vote + Jan. 6 charging vote + trial — same EC	CONFIRMED
29	Sanderson trial in absentia — cumulative notice failures	RONR (12th ed.) §§63:31, 63:21	Dec. 16 notice (location missing); Jan. 6 deceptive call	STRONG
30	Simultaneous charging of multiple accused — no joint-act basis established	RONR (12th ed.) §63:12	Jan. 6, 2026 EC minutes — simultaneous charging vote	STRONG
31	Defective Dec. 16 charge notice — cited "cause" only, no specificity	RONR (12th ed.) §§63:24–25	Dec. 5, 2025 notice (Packet-1 / Figure 7)	CONFIRMED
32	Jan. 6 charges cited RONR §61:3 — subsidiary authority superseded by Bylaws	Bylaws Art. XI §3; Art. V §3(F)(2)	Charging documents — RONR §61:3 cited; "maliciously and frivolously"	CONFIRMED
33	Swanson failure to assume chair — succession chain violated	Bylaws Art. III §5(A)	Trial transcript D-001; Montes departure; Swanson presence on record	CONFIRMED
34	Jurek participation without objection — authorized unlawful proceeding	Bylaws Art. III §6(A); Art. I §7B	Trial transcript — Jurek present throughout, no objection	STRONG
35	Secret ballot disclosure — leak originated from within EC	RONR executive session rules	Charging docs (Packet-1) identify secret ballot votes; Trial_CathyDuke.docx	STRONG

#	Violation	Authority	Key Evidence / Source	Status
36	Proposed Bylaw 2 — EC binding interpretation usurps CCC authority	Bylaws Art. II §6(A); Art. XII; RONR §56:68	Proposed Bylaw Changes 2.docx; Bylaws Committee Analysis v3	ANTICIPATED
37	Proposed Bylaw 3 — Treasurer removes own dual-signature requirement	Bylaws Art. III §6(F); Art. I §7B	Proposed Bylaw Changes 3.docx; Bylaws Committee Analysis v3	ANTICIPATED
38	SD22 Chair position — unilaterally removed from leadership table by Chair	Bylaws Art. II §6(A); Art. IV §1	KirbyGlad_Complaint_signed.pdf	STRONG

PART VIII — EVIDENCE INVENTORY (Confirmed In-Hand)

ID	Document	Key Content	Supports
E-01	Email #8, Carey to Halvorsen, Sep. 3, 2025	<i>Carey directs Halvorsen to call Murray PD; hostile tone; McCay reference; CC to Montes (Vice Chair), Jurek (Treasurer), Swanson (Secretary) — all four officers on notice of directive before charges filed</i>	Violations 1–4
E-02	Full Halvorsen/Carey email thread (Sep. 1 – Oct. 17, 2025)	<i>Complete record of Carey/Halvorsen dispute preceding charges</i>	Violations 1–4
E-03	Carey Feb. 6, 2026 email to 50+ recipients	<i>Confirms pre-trial consultation with Glad ('We have consulted...')</i>	Violations 9, 10
E-04	Vice Chair Montes letter, Feb. 5, 2026	<i>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."</i>	Violations 9–20
E-05	Charging documents (all 8 defendants)	<i>Standards of Conduct framed as RONR §61:3 charges; criminal statute citation</i>	Violations 5, 6, 18
E-06	SLCoGOP Violations Register v1.docx	<i>11-category violation analysis; root cause through post-trial</i>	All violations
T-01	Trial transcript D-001	<i>Succession chain violation stated on record</i>	Violation 10
T-02	Trial transcript D-002	<i>Bylaws hierarchy correctly stated; overruled by presiding officer</i>	Violation 17
T-03	Trial transcript D-003	<i>Criminal statute charge cross-referenced to 'not criminal' ruling</i>	Violation 18
T-04	Trial transcript D-101	<i>EC member states: 'the ethics committee was never involved in this'</i>	Violation 5
T-05	Trial transcript D-105	<i>Wrong quorum threshold announced; no roll call confirmed</i>	Violations 11–13
T-06	Cathy Duke trial summary	<i>Vote counts confirming quorum failure; confidentiality promise on record</i>	Violations 12–14
T-07	January 6, 2026 transcript	<i>Carey admits Dec. 16 defects; Sanderson cleared; Carey violation confirmed</i>	Violation 8
P-01	Carey public X post (public record)	<i>EC report attached; all 8 defendants named with charges and penalties</i>	Violations 3, 20

ID	Document	Key Content	Supports
E-07	Kaye Sanderson punishment letter, Feb. 18, 2026	Signed by Carey alone. Penalties: removal, barred through May 1, 2030, censure on party website. CC'd to Utah GOP State Central Committee. Claims "trial proceeded as provided in RONR §63:31".	Violation 19
E-08	Casey Gale formal ethics complaint vs. Carey, Nov. 6, 2025	Formal complaint filed to ethics@slcogop.com. Includes iMessage screenshots: Carey to Gale: "go fuck yourself, Casey," "You're a scumbag," "Lawyer up, fucker." Filed while Carey was simultaneously initiating charges against 8 members.	Violations 3, 4
E-09	Halvorsen defense letter to Ethics Committee, Nov. 13, 2025	Halvorsen's written defense citing free speech; includes Carey's public social media posts as exhibits documenting his Standards of Conduct violations.	Violations 3, 4
E-10	October 7, 2025 EC minutes	Confirms Brinton as SD9 District Chair (role 1) and voting EC member (role 2). Present and voting at meeting where disciplinary direction was set.	Violation 7
E-11	December 2, 2025 EC minutes	Brinton present as SD9 Chair + voting EC member. Christian Drain removed for social media posts (selective prosecution precedent). Montes moved to create endorsement guidelines committee. Dec. 16 emergency meeting explicitly called to advance proceedings against Sanderson and Fetzer.	Violations 4, 7, 8
E-12	December 16, 2025 EC minutes	CONFIRMED (workspace). 5 on-record violations: notice POO overruled; exec-session POO overruled; Sanderson/Fetzer/counsel departed; recording suppressed after passing; EC motion acknowledging defective notice (30 days required).	Violations 8, 21
E-13	January 6, 2026 EC minutes	CONFIRMED (workspace). 2/3 majority charging vote. All 8 defendants named. Brinton listed as SD9 Chair only. Kirby Gladwin as parliamentarian.	Violations 7, 22
E-14	Tracie Halvorsen formal charges, Jan. 6, 2026	Ethics Committee report (Nov. 24, 2025) attached. EC recommended censure only. Carey escalated to full removal trial. Dual basis: RONR §61:3 + Standards of Conduct — confirms charges ARE Standards-of-Conduct-based.	Violations 3, 5, 23
E-15	Sanderson/Halvorsen Notices — Failure to Call Meeting, May 19, 2026	Three documents. Carey refused to call separate special CCC meeting; folded into May 30 agenda. Written objections cite RONR §§9:13–14 and Bylaws Art. II §8(B)(5).	Violation 24

PART IX — DOCUMENTS STILL NEEDED

Document	Why Needed	Violations	Priority
Kaye Sanderson punishment letter (Feb. 18, 2026) — CONFIRMED IN-HAND	CONFIRMED (uploaded May 2026). Signed by Carey alone; penalties: removal + barred through May 1, 2030 + censure. CC'd to Utah GOP State Central Committee.	Violation 19	CONFIRMED
October 7, 2025 EC minutes	PARTIALLY CONFIRMED (uploaded May 2026). Oct. 7 minutes confirm roles 1 (SD9 Chair) and 2 (voting EC member). Dec. 2 minutes also in-hand. Role 3 (parliamentarian title) still needs transcript confirmation.	Violation 7	HIGH
December 16, 2025 EC minutes — CONFIRMED IN-HAND	CONFIRMED (workspace). Key findings: 5 on-record violations; recording suppressed; EC self-acknowledged defective notice. See E-12.	Violation 8	CONFIRMED
Vice Chair Montes letter (Feb. 5, 2026)	CONFIRMED in-hand (uploaded May 2026). Reply-all to full EC, Feb. 5, 2026. Verbatim quote documented in Section 4.5.	Violations 9–10	CONFIRMED
Full Halvorsen/Carey email thread (all emails, Sep. 1 – Oct. 17, 2025)	Email #8 is confirmed in-hand (uploaded May 2026). Remaining thread emails (Emails #1–7 and #9–end) needed for complete record through Oct. 17, 2025.	Violations 1–4	MEDIUM
Neil Sebring co-signing document	Confirms Sebring's identical conduct to the 8 defendants — selective prosecution	Violation 4	MEDIUM
Post-trial Carey email / county-wide announcement	Confirms timing of public disclosure relative to confidentiality promise	Violation 20	MEDIUM
September 2, 2025 EC meeting minutes	Documents the unauthorized municipal endorsement vote; identifies which EC members participated and therefore have a direct self-interest in the outcome of the trials.	Violations 1–4	HIGH
Ethics Committee report on Carey's own violation (Jan. 6, 2026 exec session)	Confirmed at Jan. 6 executive session that Carey himself violated ethics while Sanderson was cleared. Written report not yet located. Directly supports selective enforcement argument.	Violation 4	HIGH
Glad compensation documentation	Kirby Glad complaint references compensation 'via payment in kind.' Documents the financial relationship between Carey and the presiding parliamentarian.	Violations 9, 10	MEDIUM

PART X — RECOMMENDED REMEDIES

A. Immediate Actions (CCC or EC)

1. Vacate all trial verdicts and penalties from February 9-10, 2026 trials — violations 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), no prior investigation (RONR 63:7), structural jury conflict (RONR 63:13), and quorum failure (Art. IV §3(B)).
2. Declare the September 2, 2025 municipal endorsement null and void as exceeding Bylaw authority under Art. XI §4. Direct the Ethics Committee to assess whether any further action is warranted.

3. Retract Carey's February 18, 2026 punishment letter to Kaye Sanderson — issued unilaterally, without EC vote, and communicated as a public censure — and rescind any public posting on the Party website.
4. Require Chair Carey to remove his X/Twitter post publicly naming the defendants and disclosing trial outcomes, as a violation of RONR executive session confidentiality and Bylaws Art. V §3(F)(10).

B. Ethics Committee Referrals

1. Refer Chair Carey to the Ethics Committee for: (a) bad faith — directing members to contact law enforcement, then charging eight members for the same act; (b) derogatory language toward members (Art. I §7C); (c) selective enforcement — aggressively prosecuting eight members while his own confirmed ethics violation resulted in no sanction; (d) hiring and directing the presiding parliamentarian.
2. Direct the Ethics Committee to complete the investigation of Carey's own confirmed ethics violation (January 6, 2026 executive session) and issue a formal written recommendation to the EC.
3. Refer Secretary Swanson to the Ethics Committee for: deceptive January 6 meeting notice; failure to assume the chair per Art. III §5(A).

C. County Central Committee Actions

1. Adopt a formal CCC resolution declaring the September 2, 2025 endorsement and all derivative disciplinary actions void, per Art. II §6(A) as governing body.
2. Reject Bylaw Proposals 2 and 3 as submitted. Direct the Bylaws Committee to prepare substitute language. Require Proposal 1 to be amended to include a mandatory litigation hold before the CCC considers it.
3. Comply with Art. II §8(B)(5) and RONR §§9:13-14: call the petitioned special CCC meeting with proper notice, separate from the regular CCM agenda.
4. Consider removal of Chair Carey under Art. II §6(C) for cause, by 2/3 vote with 20% quorum, after Ethics Committee process is complete.

D. State Party and External Actions

1. Escalate this register to the Utah Republican Party State Central Committee for review of whether Chair Carey's conduct threatens the Party's charter or violates State Party rules.
2. Support the NAP complaint against Parliamentarian Kirby Glad (filed April 30, 2026) with this register as corroborating evidence.
3. Individual affected members should consult independent legal counsel regarding civil action for breach of fiduciary duty, breach of the party membership agreement, and tortious interference with political rights.