

**GARY G. GRIMMER & ASSOCIATES**  
ATTORNEYS

City Financial Tower  
201 Merchant Street, Suite 1940  
Honolulu, Hawai'i 96813  
Phone (808) 457-1330 — Cell  
Gary@grimmerhawaiiilaw.com - www.GrimmerHawaiiLaw.com

March 19, 2019

**VIA EMAIL – cela@fec.gov**

Federal Election Commission  
Office of Complaints Examination & Legal Administration  
Attn: Kathryn Ross, Paralegal  
1050 First Street, NE  
Washington, DC 20463

Re: MUR 7572 Response

Dear Ms. Ross:

Attached is my Response. I believe that the FEC General Counsel erroneously determined I was a Respondent. My attached Declaration explains why I disagree. At any rate, I know you will confirm receipt and I expect that the FEC will determine that I am not a Respondent.

Very truly yours,

  
Gary G. Grimmer

Enclosures

GGG/el

**FEDERAL ELECTION COMMISSION  
MUR # 7572**

**DECLARATION OF NAMED RESPONDENT GARY GRIMMER**

I, GARY G. GRIMMER, under oath, declare as follows:

1. I am Gary G. Grimmer, non-respondent herein, named as Gary Grimmer in the Complaint.
2. The Complaint expressly states that my name is listed to provide “contact info for HRP’s last know general counsel”. Unlike the letter to me from the FEC Assistant General Counsel, I don’t conclude that I am a Respondent. However, to not waste time on that issue, I submit this Declaration.
3. I am not and have never been an officer or director of the Hawai’i Republican Party or the Cam Cavasso Campaign, nor am I and I have never been General Counsel of the HRP.
4. The HRP Rules do not provide for a General Counsel.
5. Neither I nor my associate attorney have ever been employees of the HRP or Cam Cavasso Campaign.
6. From around May 2017 to now, my law firm, Gary G. Grimmer and Associates, has acted as attorneys for the HRP on an as-requested basis. We have never acted as attorneys for the Cam Cavasso Campaign.
7. Our legal services to the HRP have been pro bono to promote a viable two-party political system in Hawai’i at no charge.

8. The first I even heard of the donations and expenditures alleged in the Complaint was reading its allegations. I was not consulted by anyone concerning the matters alleged nor present at any meetings where they were mentioned or discussed.

9. I have never met Eric Ryan, but observed him testifying in Hawai'i State District Court in 2018 as a Defendant in a TRO Complaint brought by Andria Tupola, then Republican candidate for Governor of the State of Hawai'i. A copy of the TRO against Mr. Ryan is attached hereto as Exhibit 1.

10. Also, in 2017, I defended HRP's National Committee Woman Miriam Hellreich from Hawai'i, in a threatened case by Eric Ryan against her for allegedly improperly excluding him from being seated as a delegate at the 2016 National Republican Convention. Mr. Ryan's attorney in that matter was John Carroll, who became a candidate for the Republican nomination for Governor of Hawai'i in 2018. Mr. Carroll lost that primary to Ms. Tupola. Attached hereto as Exhibit 2 is one of my letters to John Carroll in that matter. In July of 2017, Mr. Carroll surrendered his Hawaii law license in lieu of discipline. A copy of the Hawai'i Supreme Court's Order Allowing Resignation is attached hereto as Exhibit 3. Mr. Ryan was Mr. Carroll's Campaign Manager in the losing gubernatorial campaign.

11. In addition, in 2017 and 2018 I sent letters to Constant Contact, phplist and mailchimp complaining about Mr. Ryan's improper use of their digital platforms and

requested he be removed from same. Constant Contact locked the HIRA account run by Mr. Ryan. Attached hereto as Exhibit 4 are my letters to these platforms.

12. Mr. Ryan can never stick with the facts and merits of matters without including his emotional personal vendettas against those who oppose his allegations and positions. Attached hereto as Exhibit 5 is his latest post on the HIRA website that further demonstrates his unusual, uncalled for wisecracks about his allegations. He also attributes a quote to me that is a fabrication by him. I have never been consulted by HRP officers and directors about document retention and destruction.

13. I assume most complaints to the FEC are by persons or entities who have a stake in the campaign and/or election affected. To my knowledge, Mr. Ryan neither funded or worked for an opponent of Cam Cavasso in the 2018 primary or general election for Hawai'i Representative to the U.S. House of Representatives, won by Democrat Ed Case.

I, Gary G. Grimmer, declare under penalty of law that the foregoing is true and correct.

DATED: Honolulu, Hawai'i, March 19, 2019.

  
GARY G. GRIMMER



\_\_\_\_\_ Respondent was present and orally informed of the terms and conditions of this Order, but left the courtroom before receiving a copy of this Order, in violation of the Court's instruction to remain in the courtroom until given a copy of the Order.

The Court has jurisdiction over the parties and this matter and Respondent was provided notice and given the opportunity to be heard.

**THE COURT HEREBY ORDERS THAT:**

1. The Petition For Injunction Against Harassment is granted.
2. Respondent and any other person acting on behalf of Respondent are hereby restrained from:
  - A. Contacting, threatening or harassing Petitioner. Contact includes but is not limited to telephone, cell phone, mail, facsimile, pager, electronic mail, internet, text messages, social networking sites, etc.
  - B. Entering or visiting Petitioner's residence, including yard and garage, or Petitioner's office.
3. The parties or their attorneys shall not be prevented from serving court documents upon each other as authorized by court rules.
4. This Injunction Order is in effect as of May 25, 2018 and shall remain in effect for three (3) years unless terminated or modified by the Court.
5. Special conditions or modifications:
  1. Respondent shall not post items about Petitioner's family members unless they are running for or in political office.
  2. Respondent shall not post photos of Petitioner's family members.
  3. Respondent shall not include Petitioner in any of his e-mail or contact lists.
6. **WHILE THIS INJUNCTION ORDER IS IN EFFECT, RESPONDENT IS PROHIBITED FROM POSSESSING, CONTROLLING, OR TRANSFERRING ANY FIREARM OR AMMUNITION. ANY FIREARM OR AMMUNITION IN THE POSSESSION OR CONTROL OF RESPONDENT MUST BE IMMEDIATELY TURNED OVER TO THE HONOLULU POLICE DEPARTMENT FOR SAFEKEEPING UNTIL THIS INJUNCTION ORDER IS NO LONGER IN EFFECT.**
7. **ANY KNOWING OR INTENTIONAL VIOLATION OF THIS INJUNCTION AGAINST HARASSMENT IS A MISDEMEANOR PURSUANT TO HRS § 604-10.5, WHICH MAY BE PUNISHABLE BY IMPRISONMENT UP TO ONE (1) YEAR AND/OR A FINE UP TO \$2,000. IN ADDITION, ANY VIOLATION OF THE FIREARM AND AMMUNITION PROHIBITION SHALL BE PUNISHABLE AS A MISDEMEANOR OFFENSE UNDER HRS § 134-7.**
8. **THIS INJUNCTION ORDER IS ENFORCEABLE IN ALL 50 STATES, DISTRICT OF COLUMBIA, U.S. TERRITORIES, AND TRIBAL LANDS [18 USC § 2265]. INTERSTATE VIOLATION OF THIS ORDER IS SUBJECT TO FEDERAL CRIMINAL PROSECUTION [18 USC §§ 2261(g), 2261A, AND 2262].**
9. **THE POLICE SHALL ENFORCE THIS INJUNCTION ORDER.**

Dated: Honolulu, Hawai'i, May 25, 2018.

HILARY BENSON GANGNES

Judge

I do hereby certify that this is a full, true, and correct copy of the original on file in this office.

\_\_\_\_\_  
Clerk, District Court of the First Circuit, State of Hawai'i

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Gary@grimmerhawaiiilaw.com - [www.GrimmerHawaiiLaw.com](http://www.GrimmerHawaiiLaw.com)

June 27, 2017

John S. Carroll, Esq.  
810 Richards Street, Suite 810  
Honolulu, Hawaii 96813

*Email: johncarro011@gmail.com*

Re: Eric Ryan and 2016 Republican National Convention

Dear Mr. Carroll:

I have been retained by Miriam Hellreich to respond to your demand letter on behalf of Eric Ryan. Both your letter and its threatened complaint fail to state a single cause of action. If ever filed, the complaint would be a violation of Haw.R.Civ.P. 11(b) and subject both you and Ryan to sanctions. In addition, we would seek an award of attorney's fees and costs under Haw.Rev.Stat. § 607-14.5 for the frivolous complaint.

Your letter and threatened complaint are based on tort theories and totally ignore (a) Ms. Hellreich's constitutional rights of free political speech and assembly and the U.S. Supreme Court's clear holdings that courts are not to supervise political party processes, and (b) Ryan's status as a guest.

If Ryan proceeds with his threatened suit against Miriam Hellreich, the suit would be subject to dismissal on two grounds: (1) that allowing the suit to proceed infringes on Ms. Hellreich's right to freedom of association and freedom of speech; and (2) that the issues raised by the complaint are non-justiciable because courts are not to meddle in the governance of political parties, and substitute its judgment for that of the party.

In *Cousins v. Wigoda*, 419 US 477, 95 S.Ct. 541, 42 L.Ed.2d 595 (1974), there was a dispute over who were entitled to be seated as delegates from the State of Illinois at the National Democratic Party convention. The Cousins delegates challenged the seating of the Wigoda delegates before the Credentials Committee of the National Democratic Party on the ground that the Wigoda delegates were selected in violation of party guidelines. The credentials committee agreed.

John S. Carroll, Esq.  
June 27, 2017  
Page 2

Two days before the Convention opened, the Wigoda delegates obtained an injunction from the Circuit Court of Cook County, Illinois enjoining the Cousins delegates from acting or purporting to act as a delegate at the Convention. Notwithstanding the injunction, the Cousins delegates participated fully as delegates throughout the Convention. The Illinois Appellate Court affirmed the injunction, and the Supreme Court of Illinois denied leave to appeal. The case then went to the US Supreme court, which granted certiorari to decide whether the Illinois Court was correct in according primacy to state law over the National Political Party's rules in the determination of qualifications and eligibility of delegates to the Party's National Convention. The US Supreme Court reversed the Illinois State court grant of injunction.

Although acknowledging that the right to vote is a fundamental political right, the U.S. Supreme Court found that suffrage was exercised at the primary election to elect delegates to a National Party Convention. The States themselves have no constitutionally mandated role in the selection of President and Vice-Presidential candidates. If each state could establish qualifications of its delegates to the various party conventions, without regard to party policy, it could seriously undercut or destroy the effectiveness of the National Party Convention. Citing *O'Brien v. Brown*, 409 U.S. 1, 4 (1972), the U.S. Supreme Court concluded that the convention itself was the proper forum for determining intra-party disputes as to which delegates should be seated, and reversed the Illinois Court.

The *O'Brien v. Brown*, 409 U.S. 1, 92 S.Ct. 2718, 34 L.Ed.2d 1 (1972) case also involved a challenge by unseated delegates from Illinois and California to the Democratic National Convention. The Credentials Committee determined that the "winner-take-all" primary system violated the slate-making guideline adopted by the Democratic Party in 1971, and therefore unseated 151 of the 271 delegates from California committed by California law to Senator George McGovern. A complaint challenging the Credentials Committee action was dismissed by the District Court. On review, the Court of Appeals concluded that the action of the Credentials Committee violated the Constitution of the United States. The U.S. Supreme Court reversed the Appellate Court and affirmed the dismissal of the Complaint. It concluded that the convention itself was the proper forum for determining intra-party disputes, and noted "the large public interest in allowing the political processes to function free from judicial supervision". 409 U.S. 1, 92 S.Ct. 2720, 34 L.Ed.2d 1.

In *Ripon Soc. v. National Republican Party*, 525 F.2d 567 (D.C. App. 1975) the Ripon Society and nine individual plaintiffs filed suit claiming that the delegate allocation formula adoption by the National Republican Party for its 1976 convention violated the Equal Protection Clause of the Fourteenth Amendment and the Fifth Amendment's Due Process clause. In rejecting the Plaintiff's challenge, the Appellate Court for the District of Columbia cited First Amendment freedom of speech and of political association concerns:

The express constitutional rights of speech and assembly are of slight value indeed if they do not carry with them a concomitant right of political association. Speeches and assemblies are after all not ends in themselves but means to effect change through the political process. If that is so, there must be a right not only to



John S. Carroll, Esq.  
 June 27, 2017  
 Page 3

form political associations but to organize and direct them in the way that will make them most effective. The Supreme Court has frequently stressed the close kinship of the freedoms of speech and of political association. *See, e.g., Kuypers v. Panties*, 414 U.S. 51, 56-57, 94 S. Ct. 303, 38 L. Ed. 2d 260 (1973); *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 460, 78 S. Ct. 1163, 2 L. Ed. 2d 1488 (1958). It has declared that "any interference with the freedom of a party is simultaneously an interference with the freedom of its adherents. [**\*\*52**] " *Sweezy v. New Hampshire*, 354 U.S. 234, 250, 77 S. Ct. 1203, 1212, 1 L. Ed. 2d 1311 (1957). It has invoked the *First Amendment* to strike down state restrictions on access to the general election ballot, stating that "the right to form a party for the advancement of political goals means little if a party can be kept off the election ballot and thus denied an equal opportunity to win [**\*586**] votes." *Williams v. Rhodes*, 393 U.S. 23, 30-31, 89 S. Ct. 5, 11, 21 L. Ed. 2d 24 (1968).

552 F.2d at 585.

Likewise, in *Democratic Party of the United States v. Wisconsin*, 450 U.S. 107, 101 S Ct. 1010, 67 L.Ed.2d 82 (1981), the U.S. Supreme Court held that when Wisconsin ruled that the Democratic National Party was required to seat delegates at its national convention who had been selected through a process that did not require them to declare their party affiliation that it had violated the Party's First Amendment rights. Citing *Cousins v. Wigoda*, 419 US 477, 95 S.Ct. 541, 42 L.Ed.2d 595 (1974), the Court stated:

The *Cousins* Court relied upon the principle that HN9 "[the] National Democratic Party and its adherents enjoy a constitutionally protected right of political association." *Id.*, at 487. See also, *id.*, at 491 (REHNQUIST, J., concurring). This *First Amendment* freedom to gather in association for the purpose of advancing shared beliefs is protected by the *Fourteenth Amendment* from infringement by any State. *Kusper v. Pontikes*, 414 U.S. 51, 57; *Williams v. Rhodes*, 383 U.S. 23, 30-31. [**\*\*\*\*25**] See also *NAACP v. Alabama ex rel. Patterson*, [**\*122**] 357 U.S. 449, 460. And the freedom to associate [**\*\*\*\*95**] for the "common advancement of political beliefs," *Kusper v. Pontikes*, *supra*, at 56, necessarily presupposes the freedom to identify the people who constitute the association, and to limit the association to those people only.

"Freedom of association would prove an empty guarantee if associations could not limit control over their decisions to those who share the interests and persuasions that underlie the association's being." L. Tribe, *American Constitutional Law* 791 (1978).

Your draft complaint clearly concedes that whether Ryan could attend the National Convention set for July 18-21, 2016 *as a guest* was resolved by the RNC in its letter dated June 13, 2016, 35 days before the Convention. Thus, not only does the chronology not support

John S. Carroll, Esq.  
June 27, 2017  
Page 4

Ryan's complaint, courts should not and will not consider disputes among party members on who can be admitted to a National Convention as delegates, much less as guests.

Ryan was not a delegate or alternate delegate to the National Convention. Mrs. Hellreich had no duties to Ryan as a guest and was free to challenge delegates and alternate delegates on their choice of guests. Ryan's claims as a guest are not cognizable in a court action.

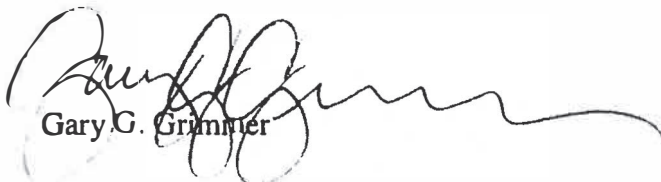
Although the complaint will be immediately dismissed for the reasons set forth above, discovery on Ryan's allegations would be very revealing on how Ryan's own long conduct and writings create a valid issue as to whether he should be a guest. That discovery would include, but not be limited to:

1. Ryan's written attacks on the Republican Party and its members.
2. Ryan's mental and emotional health history and the impact, if any, of Mrs. Hellreich's alleged conduct on them and any other "personal injury."
3. Ryan's past enjoyment and quality of life and the impact, if any, of Mrs. Hellreich's alleged conduct on it.
4. Ryan's alleged sponsors' depositions.
5. The deposition of Willes Lee and all records on how he handled guest passes for the National Convention.

For the foregoing reasons, your demand on behalf of Ryan is rejected.

In closing, this is notice to you and Ryan that he preserves and not destroy any records concerning (1) his attacks on the National and Hawaii Republican Parties and their members, (2) his medical and health records, (3) his and Willes Lee's handling of guest passes to the 2016 National Convention, and (4) Ryan's alleged economic damages. When one threatens a lawsuit, one has a duty to preserve records. If Ryan proceeds with his ill-advised threatened lawsuit, and does not preserve evidence, as requested herein, his claims will be subject to dismissal on the additional grounds that he has destroyed relevant evidence.

Sincerely,



Gary G. Grimmer

cc: Ms. Miriam Hellreich

Electronically Filed  
Supreme Court  
SCPR-17-0000460  
30-JUN-2017  
10:41 AM

SCPR-17-0000460

IN THE SUPREME COURT OF THE STATE OF HAWAI'I

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DISCIPLINARY BOARD OF THE HAWAI'I SUPREME COURT,  
Petitioner,

vs.

JOHN S. CARROLL,  
Respondent.

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ORIGINAL PROCEEDING  
(ODC Case Nos. 15-020-9239, 15-038-9257)

ORDER ALLOWING RESIGNATION IN LIEU OF DISCIPLINE  
(By: Recktenwald, C.J., Nakayama, McKenna, Pollack, and Wilson, JJ.)

Upon consideration of the petition submitted by the Disciplinary Board of the Hawai'i Supreme Court for an order granting the request of attorney John S. Carroll to resign from the practice of law in lieu of discipline, and the affidavit attached in support thereof, we find Respondent Carroll's affidavit meets the requirements of Rule 2.14(a) of the Rules of the Supreme Court of the State of Hawai'i (RSCH), and further note Respondent Carroll avers and admits to misconduct that we conclude represents violations of Rules 1.2(a), 1.5, 1.6, 1.7(a), 1.7(b), 1.14(b), 1.14(c), 1.15(a)(1), 1.15(c), 1.15(d), 1.15(e), 3.4(e), and 8.4(c) of the Hawai'i Rules of Professional Conduct (1994), and Rules 8.1(a), 8.1(b), and 8.4(c) of the Hawai'i Rules of Professional Conduct (2014). We conclude this misconduct

justifies granting the petition. Therefore,

IT IS HEREBY ORDERED that the petition to resign in lieu of discipline is granted, but that Respondent Carroll's request to resign effective October 31, 2017 is denied. The resignation shall become effective 30 days after the date of this order, pursuant to RSCH Rules 2.14(d) and 2.16(c).

IT IS FURTHER ORDERED that the Clerk of this court shall remove John S. Carroll's name from the role of attorneys licensed to practice law in this jurisdiction and, within thirty days after entry of this order, Respondent Carroll shall submit to the Clerk the original certificate evidencing his license to practice law in this jurisdiction or an affidavit establishing good cause for his failure to do so.

IT IS FURTHER ORDERED that Respondent Carroll shall comply with the requirements of RSCH Rule 2.16 governing disbarred attorneys, the Disciplinary Board of the Supreme Court of the State of Hawai'i shall provide notice of the disbarment as required by RSCH Rule 2.16(e), and the Clerk shall provide notice to all state judges, pursuant to RSCH Rule 2.16(f).

IT IS FINALLY ORDERED that Respondent Carroll shall bear the costs of these proceedings upon the timely submission by ODC of a verified bill of costs, as authorized by RSCH Rule 2.3(c).

DATED: Honolulu, Hawai'i, June 30, 2017.

/s/ Mark E. Recktenwald

/s/ Paula A. Nakayama

/s/ Sabrina S. McKenna

/s/ Richard W. Pollack

/s/ Michael D. Wilson



**Gary G. Grimmer**

---

**From:** Gary Grimmer  
**Sent:** Wednesday, September 20, 2017 9:11 AM  
**To:** Megen MacKenzie; Sharon Higa  
**Subject:** RE: Hawaii Independent Republican Assembly

Thank you (mahalo) Megen.

**Gary G. Grimmer**

Gary G. Grimmer & Associates  
City Financial Tower, 201 Merchant Street, Suite 1940, Honolulu, HI 96813  
**DIRECT:** (808) 457-1330 **CELL:** **WEB:** [www.grimmerhawaiiilaw.com](http://www.grimmerhawaiiilaw.com) **EMAIL:** [gary@grimmerhawaiiilaw.com](mailto:gary@grimmerhawaiiilaw.com)  
Practical Solutions To Legal Issues Throughout The Islands For 40 Years  
Business & General Civil Law – Contracts & Transactions – Courts, Arbitrations & Mediations

**IMPORTANT/CONFIDENTIAL:** This message may contain confidential and privileged information. If it has been sent to you in error, please reply to inform the sender of the error and then delete this message.

**From:** Megen MacKenzie  
**Sent:** Wednesday, September 20, 2017 6:13 AM  
**To:** Sharon Higa <[sharon@grimmerhawaiiilaw.com](mailto:sharon@grimmerhawaiiilaw.com)>  
**Cc:** Gary Grimmer <[Gary@grimmerhawaiiilaw.com](mailto:Gary@grimmerhawaiiilaw.com)>  
**Subject:** Re: Hawaii Independent Republican Assembly

Hello Sharon and Gary,

I've locked the account in question after reviewing the cease and desist letter you sent over. I will refer the owner of the account to Gary Grimmer if they have any questions, however, we will keep the account locked until there is either an agreement between both parties, or until we receive a court order stating who to turn the account over to.

Please let me know if you have any questions.

Thank you,

Megen

--

Megen MacKenzie  
Legal Compliance Coordinator  
Constant Contact  
3675 Precision Dr,  
Loveland, CO 80538  
Email: [mmackenzie@constantcontact.com](mailto:mmackenzie@constantcontact.com)  
Phone: (970) 203-7345  
Fax: (781) 652-5130  
Web: [www.constantcontact.com](http://www.constantcontact.com)

On Tue, Sep 19, 2017 at 2:53 PM, Sharon Higa <[sharon@grimmerhawaiiilaw.com](mailto:sharon@grimmerhawaiiilaw.com)> wrote:

Dear Ms. MacKenzie,

Attached for your information and files is a letter to you from Gary G. Grimmer, Esq.

A hard copy of this letter will also be mailed to you.

Regards,

*Sharon Higa*

*Assistant to Gary G. Grimmer, Esq.*

*and Ann Correa, Esq.*

--  
  
**Megen MacKenzie**  
Legal Compliance Coordinator  
Constant Contact  
3675 Precision Dr,  
Loveland, CO 80538  
Email: [mmackenzie@constantcontact.com](mailto:mmackenzie@constantcontact.com)  
Phone: (970) 203-7345  
Fax: (781) 652-5130  
Web: [www.constantcontact.com](http://www.constantcontact.com)

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Gary@grimmerhawaiiilaw.com - [www.GrimmerHawaiiLaw.com](http://www.GrimmerHawaiiLaw.com)

October 19, 2017

Via e-mail only (info@phpList.com)

Re: Your Customer Hawaii Republican Assembly

Dear phpList,

The Hawaii Republican Assembly (“HiRA”) and/or its President, Eric Ryan, recently signed on with phpList to disseminate e-mails it calls “Alerts”. We are attorneys for HiRA’s target, the Hawaii Republican Party (“HRP”). The typical “Alert” defames officers of HRP and contains falsehoods about its plans and policies. In addition, the e-mail addresses HiRA is sending to are for the most part HRP’s confidential proprietary membership data.

Enclosed are (a) my letters to the President of HiRA, Eric Ryan, demanding he cease and desist from using the data and defaming HRP officers, and (b) my letter to Constant Contact’s Legal Compliance Officer informing of the foregoing, resulting in Constant Contact locking the account and HiRA moving to you.

We recognize and applaud php’s high professional ethical standards set forth in your website. We respectfully request you close and lock HiRA’s use of your service because it clearly violates the terms and conditions of your customer agreement and your professional ethical standards.

Enclosed is the one “alert” HRP members have received to date using phpList. In addition to containing defamatory attacks and other false information, and using HRP’s membership data without license or permission, near the bottom they use a banner “Grimmerblack Burnmail”. This is a malicious and childish unauthorized use of my name and Mark Blackburn’s name. It clearly does not convey any substantive message and only serves to announce their intention to continue misusing that which does not belong to them. Included in the enclosures herein is my letter to Eric Ryan demanding he cease and desist from defaming Mr. Blackburn.

I have also represented another HRP officer and delegate to the Republican National Committee in opposing Eric Ryan’s threat to sue her. Thus, it is clear Mr. Ryan is using his alert

Mr. Eric Ryan  
October 19, 2017  
Page 2

as a vendetta against me and Mr. Blackburn and is using your services to satisfy his petty contempt for those of us who don't tolerate his malicious unfounded disrespectful attacks.

Finally, while using Constant Contact, HiRA did not acknowledge and grant requests to unsubscribe. It appears that HiRA is now doing so.

The above clearly violates your terms, conditions and standards. We trust that you will lock and close HiRA's account. Constant Contact even refused to honor Eric Ryan's request that it send him his mailing addresses back.

I encourage you to call or write me with any questions, thoughts and decisions concerning this request.

Very truly yours,



Gary G. Grimmer

Enclosures

cc: Hawaii Republican Party  
Mr. Mark Blackburn



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Gary@grimmerhawaiiilaw.com - [www.GrimmerHawaiiLaw.com](http://www.GrimmerHawaiiLaw.com)

September 19, 2017

Via e mail ([president@hawaiiRepublicanassembly.com](mailto:president@hawaiiRepublicanassembly.com))  
and U.S. Regular Mail

Mr. Eric Ryan  
Hawaii Independent Republican Assembly  
P.O. Box 2567  
Ewa Beach, HI 96707

Re: Cease and Desist Use of Hawaii Republican Party  
Membership Information

Dear Mr. Ryan,

We write you as attorneys for the Hawaii Republican Party ("HRP"). For a couple of years now, you have used the HRP's confidential, proprietary membership data to send out frequent self-proclaimed "alerts" to HRP's members and other electronic communications. You have done so without license or permission from the HRP. Indeed, you obtained the information illegally and have not even made a pretense of seeking a license or permission to use the information.

Much of what you write and disseminate as factual is clearly and demonstrably false. Many of these falsehoods are about people and defamatory.

On behalf of HRP we hereby demand that you immediately cease and desist from using HRP's confidential, proprietary membership information for any and all purposes, including but not limited to e-mailing HRP members "alerts" or any other electronic communication.

This is also notice that the officers and directors of HRP that you have defamed reserve their right to sue you and HIRA for defamation whether or not you cease and desist from using HRP's membership information. However, your failure to cease and desist from its use and continued written falsehoods, is strong evidence of your malice.

Sincerely,

  
Gary G. Grimmer

cc: Hawaii Republican Party

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October 18, 2017

Via e mail ([president@hawaiiRepublicanassembly.com](mailto:president@hawaiiRepublicanassembly.com))  
and U.S. Regular Mail

Mr. Eric Ryan  
Hawaii Republican Assembly  
P.O. Box 2567  
Ewa Beach, HI 96707

Re: **Second Notice to Cease and Desist Use of Hawaii Republican Party  
Membership Information**

Dear Mr. Ryan,

We write you as attorneys for the Hawaii Republican Party ("HRP"). For a couple of years now, you have used the HRP's confidential, proprietary membership data to send out frequent self-proclaimed "alerts" to HRP's members and other electronic communications. You have done so without license or permission from the HRP. Indeed, you obtained the information illegally and have not even made a pretense of seeking a license or permission to use the information.

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On behalf of HRP we hereby demand that you immediately cease and desist from using HRP's confidential, proprietary membership information for any and all purposes, including but not limited to e-mailing HRP members "alerts" or any other electronic communication.

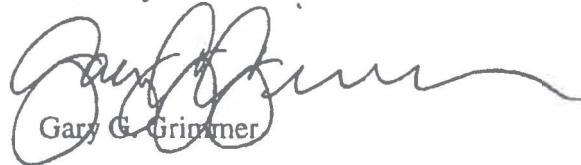
This is also notice that the officers and directors of HRP that you have defamed reserve their right to sue you and HIRA for defamation whether or not you cease and desist from using HRP's membership information. However, your failure to cease and desist from its use and continued written falsehoods, is strong evidence of your malice.

Your malice is also clear and palpable on your alert using phpList.com with a footer banner "Grimmerblack Burnmail." Although Mr. Blackburn and I are proud to challenge and refute your false and defamatory alerts, your unauthorized use of our

Mr. Eric Ryan  
October 18, 2017  
Page 2

names is objectionable and we hereby demand you cease and desist using them in any way.

Sincerely,



Gary G. Grimmer

cc: Hawaii Republican Party  
Mr. Mark Blackburn

**GARY G. GRIMMER & ASSOCIATES**  
ATTORNEYS

City Financial Tower  
201 Merchant Street, Suite 1940  
Honolulu, Hawai'i 96813  
Phone (808) 457-1330 – Cell  
Gary@grimmerhawaiiilaw.com - www \_\_\_\_\_ iiLaw.com

September 19, 2017

Via e-mail ([mmackenzie@constantcontact.com](mailto:mmackenzie@constantcontact.com))  
and U.S. Regular Mail \_\_\_\_\_

Constant Contact  
3675 Precision Drive  
Loveland, CO 80538  
Attn: Megen MacKenzie  
Legal Compliance Coordinator

Re: Hawaii Independent Republican Assembly

Dear Ms. MacKenzie,

Thank you for your e-mail of September 13, 2017. I have forwarded you by e-mail a couple recent HIRA "blasts." For a couple of years, HIRA has used confidential proprietary Hawaii Republican Party membership e-mail addresses to disseminate these blasts.

Also, I have enclosed a copy of my recent cease and desist letter to HIRA

Very truly yours,

  
Gary G. Grimmer

cc: Hawaii Republican Party

----- Forwarded Message -----

**From:** n Assembly <alerts@hawaiiRepublicanassembly.com>

**To:**

**Sent:** 12, 2017 9:48 AM

**Subject:** RED ALERT: No \$\$ for Hawaii GOP Candidates - Thrown to Wolves in 2018

Aloha. The Hawaii Republican Assembly (HIRA) is standing up to phony Republicans who have hijacked our party in order to help the Democrats achieve their political and policy goals at the county, state and federal levels of government. These RINOs are just Democrats in disguise.

Is this email not displaying correctly?

[View it in your browser.](#)



Aloha Republicans:

As you know, the 2018 election campaign is right around the corner. Astute political observers know the campaign already began last November. However, today HIRA can exclusively report the **terrible news** that RINO party leaders have already made decisions which will throw the 2018 election in favor of Democrats while throwing GOP candidates to the wolves. Shocking orders came directly from the top two officials at the Hawaii GOP to whom puppet state chair **Shirlene Ostrov** is clearly subservient. From HIRA's vantage point, the RINO tag team of

Miriam Hellreich and Pat Saiki have already made it clear to the rest of the Hawaii GOP leadership that things will stay exactly the same as in past years -- *all but guaranteeing the party's losing streak. Here's the mountain of quickly mounting evidence*

*that 2018 will be a bust . . .*

First, the Hawaii GOP's national committeeman **Gene Ward** (*who votes 75% of the time with Democrats*) recently issued an urgent plea to other party bosses to **start dedicating funds in the party's budget for supporting candidates.** After all, under Miriam Hellreich's extremely miserable RINO leadership, the number of elected Republicans has plummeted from 22 down to just 5 in a few short years.

It's not gonna happen. Hellreich's remarkably harsh rebuttal to Rep. Ward the other day (*leaked to HIRA by a state capitol staffer*) was nothing less than **totally dismissive** of the non-existent stable of candidates who will possibly emerge to comprise the 2018 crop of sacrificial GOP contenders on ballots across the state. And when Hellreich says "no" and vetoes helping candidates, she really, really means it. Party leaders will **NOT** share Hellreich's decision with you -- most of all since they are in the midst of selling tickets to a big fundraiser for the party's costly administrative overhead and **they surely want you to believe the money will help candidates.** But HIRA has already revealed to you in recent weeks and months that the Hawaii GOP's recently approved budget has ZERO FUNDS for candidates or anything else except wasteful administrative

overhead.

RINO Miriam Hellreich, Hawaii's party leader since 1992, made it extremely clear that there will be **NO MONEY FOR CANDIDATES** in 2018 or any other year that Hellreich is still running the party -- and that the Hawaii GOP's income will be blown on the 'obligations' of administrative overhead: **"It is not the Party's role to give cash directly to a campaign. I am totally opposed to earmarking money from any Party fundraising event for a candidate fund. Existing debts and monthly obligations have to take precedence."**

## 2018 CAMPAIGN UPDATE ZERO FINANCIAL HELP FOR GOP CANDIDATES

"It is not the Party's role to give cash directly to a campaign. I am totally opposed to earmarking money from any Party fundraising event for a candidate fund. Existing debts and monthly obligations have to take precedence." Sept. 23, 2017



**MIRIAM HELLREICH**

*Hawaii GOP Leader since 1992*

Courtesy of our friends at the State Capitol, HIRA brings you the complete e-mail [HERE](#) which explicitly declares that candidates won't get any money from the party in 2018 and all monies from donors and ticketbuyers will be blown on the headquarters and other administrative overhead.

Now, the second bit of horrible news is that the Republican National Committee (RNC) just wasted a small fortune sending trainers to Hawaii in recent days in hopes of reversing the sorry fortunes of the Hawaii GOP which has been on a biennial losing streak for a LONG time at the hands of RINO party leaders. During this past weekend's costly training and presentation on 'How To Start Winning' by mainland RNC trainers, Pat Saiki -- the longtime party empress and current vice chair for coordinated campaigns -- vetoed the RNC's proposed plans for Hawaii . . . and issued her veto to the RNC's trainers right in front of the paltry handful of party volunteers who bothered to show up at the poorly attended training at the Kapiolani party headquarters . . . **"Party-building' won't work in Hawaii. We simply need to focus on finding suitable candidates,"** Saiki openly declared during the wasted training sessions. That's right, Saiki decided on the spot that RNC's plan for Hawaii was unacceptable and would "never work" in Hawaii.



**Never mind** that the RNC has been winning all over the country and knows what it takes to fix a failed state party organization. Saiki wants HRP to continue its losing tradition of merely being 'candidate centric' -- the failed practice of recruiting unknown, underfunded individuals and throwing them to the wolves in 2018 because it has worked so poorly for the Hawaii GOP since Hellreich took over the party nearly two decades ago. That's what happens when RINO's take over a party and ostensibly let Democrats win again and again. The well-meaning RNC actually wanted Hawaii to reverse its long losing streak by building a serious party organization that engages with voters and identifies the Republicans among them as a foundation. But it appears that all advice from the RNC about party building will be ignored because Pat "this won't work in Hawaii" Saiki and Miriam Hellreich even argued "we don't have time for doing all this". Their collective RINO animosity towards party organizing, canvassing and messaging combined with Saiki's demand that the party's focus be 'candidate-centric' **ensures the demise of the Hawaii GOP in 2018 and possibly beyond.** In fact, an entire year has been wasted since the last general election nearly 12 months ago with Hellreich's state party having engaged in ZERO activity prescribed by the RNC. The next 12 months are going to be even more of a bust with puppet party chair Shirlene Ostrov doing what she is told to do by Saiki and Hellreich -- **absolutely nothing at all** except divert funds from gullible donors and ticketbuyers to the Oahu League's overpriced office space and related expenses. Indeed, it's really a shame that the RNC wasted so much national donor money travelling to Hawaii and organizing trainings at great expense to party donors when Saiki and Hellreich don't want the winning plans from the RNC to be implemented at all. Really sad.

## 2018 CAMPAIGN UPDATE PARTY-BUILDING VETOED BY CAMPAIGN COORDINATOR

During this past weekend's costly training and presentation on 'How To Start Winning' by mainland RNC trainers:



**"Party-building' won't work in Hawaii. We simply need to focus on finding suitable candidates."** October 7, 2017

**PAT SAIKI**

*2018 Vice Chair, Coordinated Campaigns*

## THE SAME FAILED METHOD RINOS USED FOR DECADES



Finally, the **third** bit of bad news is that this whole affair of RINO party leaders deliberately keeping the Hawaii GOP irrelevant was a complete rehash of Saiki's recent failed tenure as state chair of the Hawaii GOP; when Saiki proudly declared to the news media that she does NOT want our party to take any positions on any issues at all, let alone fight against any terrible Democrat policies or propose any official Republican reforms or solutions. Saiki wants our party to be completely NEUTRAL; *to stand for nothing and to be against nothing.* She says we must remain quiet on how 60+ years of terrible Democrat policies have been for the people of Hawaii. As Saiki put it: **"The Republican Party does not have to take one side or the other."** . .

. WHAT?!?!? Then how in the world are we supposed to differentiate ourselves as a party, candidates, or otherwise?

#### WATCH THIS VIDEO



Anyway folks, the situation is so **bad** that Hawaii's liberal GOP leaders probably don't want HIRA telling you any of this; especially while these RINO's mislead you into believing that your donations and ticket purchases will help candidates in 2018. Sorry folks, **candidates won't see a penny of it.**

## candidate centric adjective

[kan-di-deyt sen-trik]

Practiced by the Hawaii GOP for decades. Politics that focuses on candidate's personality and interests rather than party affiliation or ideological leanings, such that Republican candidates are "Republicans in Name Only" or RINO's.

*"As far as the issues are concerned, that's up to the candidates. The Republican Party does not have to take one side or the other. Candidates can take positions on the issues according to their constituencies."* - PAT SAIKI (2014)

To sum up, Hellreich and Saiki currently run the party (*but they let you think their puppet Ostrov does*). Hellreich says **the party will NOT help candidates** financially at all - not one penny. Saiki declares that **the party will NOT be allowed to take sides on issues and she opposes adopting winning party-building strategies from the RNC.**

**So, no money and no issues.** Instead, all funds received from donors and ticket sales will be spent on the Oahu League of RINO Women-owned headquarters, the maintenance fee alone costs \$3,000 in perpetuity - double the mortgage, plus the utilities and debt and other administrative overhead expenses.

Gosh, if you're tired of the Hawaii GOP losing and losing and nothing good

happening (just smoke and mirrors and endless fundraising for overhead), **HIRA has just explained exactly why this is.** As the ancient phrase warns us, 'a fish rots from the head down'. And fishy RINO's Miriam Hellreich and Pat Saiki have shut down all hopes for island Republicans in the 13 months before the 2018 general election. However, your funds will continue to provide the RINO-controlled Oahu League of Republican Women with a nice office space so these RINO's can use their numbers to retain Hellreich and Saiki and Ostrov in power at the Hawaii GOP.



RINO party leader Pat Saiki with political turncoats and fellow progressives Aaron "Ling" Johanson and Beth Fukumoto-Chang.

# HOW WILL YOUR DONATIONS BE SPENT BY SHIRLENE OSTROV AND MIRIAM HELLREICH?



**ADMINISTRATIVE  
OVERHEAD**

NOTHING  
HAS  
CHANGED  
IN 2017



**CANDIDATE +  
BRAND SUPPORT**

**CONTINUING TO WASTE PRECIOUS CONTRIBUTION\$  
JUST LIKE HELLREICH'S PUPPETS HAVE DONE FOR YEARS**

All of this means that not one penny from the upcoming Huckabee fundraising event will be used for helping to finance candidates in 2018 or even be used to fight issues or making the case for Republicans. So, kiss your \$200 per ticket goodbye along with any other donations you've made.

---

These **no-longer-secret** announcements by Hawaii's RINO party leaders serve as yet another reminder about O'Sullivan's Law. John O'Sullivan is a British conservative political commentator and journalist who used to work for Margaret Thatcher. O'Sullivan's First Law is that "All organizations that are not actually right-wing will over time become left-wing." Nothing could be more true that the left-leaning, **Republican In Name Only Hawaii GOP** which has become the poster child for O'Sullivan's Law. Hawaii Democrats are forever grateful for being allowed to win again and again. But Hawaii Republican voters and party members and donors are being taken for a ride if they think the party of Hellreich and Saiki are actually leading the fight for change. [HINT: they're not] On the other hand, the **Hawaii Republican Assembly (HIRA)** fights Democrats everyday -- reaching a growing audience of



80,000+ per week in Hawaii on social media. But HIRA's work of draining the swamp occasionally includes exposing the RINO's who are driving our party into the ground and letting Democrats off the hook, while setting our brave candidates up to fail.

So, if you really want to unseat Democrats, you'll have to **donate** to conservative candidates directly. Not fake Republicans, mind you, but real conservatives.

★ **DON'T WASTE \$\$ ON OUR PARTY** ★  
**DONATE TO CANDIDATES DIRECTLY**

As HIRA has repeatedly warned, liberals, closet Democrats, and actual Democrats have **hijacked** Hawaii's Republican Party (HRP). It's a sad, yet highly documented fact. And these make-believe Republican leaders are doing **everything** to retain power, *including abusing party funds and party resources*. Yes, the party has been taken over by liberals who take your support for granted, abuse your donations, and misuse the GOP brand to push Democrat policies. Sadly, if you want a REAL Republican Party in Hawaii, you'll have to wait until the party is finally run by conservatives who actually disagree with 60 years of failed Democrat rule in Hawaii and are willing to fight to unseat these liberals 24/7/365. No, the revolution in Hawaii will not be led by RINO's. They are just wasting

our time and money. And these RINO's even oppose the RNC's custom, award-winning recipe for fixing what's wrong with our state party. Auwe!!  
Mahalo,





**ERIC RYAN**  
*Member, Hawaii Republican Party (HRP)*  
*President, Hawaii Republican Assembly (HIRA)*  
*Chairman, HIRA Action SuperPAC*

## SHRINKING POOL OF GOP CANDIDATES

**It's no secret that the Hawaii GOP refuses to make the case to voters in favor of electing Republicans and turning out Democrats. So, can you blame people for not wanting to run on our ticket??**

**\*\*\* THE DECLINE CONTINUES \*\*\***

	<b>2010</b>	<b>2014</b>	<b>2016</b>
<b>STATE SENATE</b>	14 candidates	7 candidates	5 candidates 
<b>STATE HOUSE</b>	46 candidates	37 candidates	27 candidates 



**Actively and Fearlessly Promoting Conservative Solutions**  
COUNTY • STATE • FEDERAL

[WWW.HAWAIIREPUBLICANASSEMBLY.COM](http://WWW.HAWAIIREPUBLICANASSEMBLY.COM)

Please click "Forward email" near the bottom of this message in order to easily share this e-mail with friends and family, neighbors and co-workers.



**CONTRIBUTE NOW TO HIRA'S SUPERPAC**

JOIN HIRA | CONTRIBUTE | VISIT WEBSITE

# JOIN US TODAY

---

# CHANGE HAWAII

# TOMORROW

*The Hawaii Republican Assembly (HIRA) is the conservative standard-bearer for Republicans in Hawaii and the leading advocate for conservative solutions in the islands. Please visit us at [www.HawaiiRepublicanAssembly.com](http://www.HawaiiRepublicanAssembly.com).*

*We are not an official arm of the Republican Party of Hawaii (RPH). We are the conservative base of the Republican Party and an affiliated chapter of the [National Federation of Republican Assemblies](#).*

paid for by the  
**Hawaii Republican Assembly** | P.O. Box 2567 | Ewa Beach, HI 96706  
[alerts@hawaiirepublicanassembly.com](mailto:alerts@hawaiirepublicanassembly.com)



**Grimmerblack Burnmail**  
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**GARY G. GRIMMER & ASSOCIATES**  
**ATTORNEYS**

City Financial Tower  
201 Merchant Street, Suite 1940  
Honolulu, Hawai'i 96813  
Phone (808) 529-1502  
Ann@grimmerhawaii.com - www.GrimmerHawaiiLaw.com

September 1, 2017

Mr. Eric Ryan, via e mail t\_\_\_\_\_manberg.com  
Mr. Willes Lee, via e mail \_\_\_\_\_  
Mr. Emil Svrčina, via e ma \_\_\_\_\_ and emil\_\_\_\_\_  
Hawaii Independent Republican Assembly, via certified mail, return receipt requested  
P.O. Box 2567  
Ewa Beach, HI 96707

Re: Demand for Removal of Defamatory Post  
CLASS ACTION LAWSUIT: Dying Hawaii GOP threatens Conservative  
HIRA over embarrassing revelations

Dear Mr. Ryan and HIRA:

This letter is sent on behalf of Mark Blackburn, individually, to demand that you, and those at the Hawaii Independent Republican Assembly, cease and desist and remove the defamatory post entitled, "CLASS ACTION LAWSUIT: Dying Hawaii GOP threatens Conservative HIRA over embarrassing revelations".

Mr. Blackburn's prior e mail to you and others, stating that legal remedies are being explored, is not the same as announcing that a class action lawsuit will be filed. The "CLASS ACTION LAWSUIT" post not only implies that a class action has already been approved, but also gives a specific dollar amount, \$80,000, as the alleged amount budgeted for legal fees. Both statements are demonstrably false, and are clearly designed to damage Mr. Blackburn, whose position as finance chair, includes responsibility for raising funds for the Hawaii Republican Party, and to damage the Hawaii Republican Party itself.

HIRA's posts, with the recurring theme to the effect that party leaders, including Mr. Blackburn, plan to spend 100% of donor funds on overhead, including paying for the Hawaii Republican Party headquarters or legal fees, and none of the donor funds on electing Republicans to office and advancing Republican issues, are also false.

To the extent that you and HIRA may have misconstrued Mr. Blackburns prior remarks you are now on notice that there is no approved class action, that \$80,000 has not been budgeted for legal fees, and that Mr. Blackburn does not support spending 100% of donor funds on

Eric Ryan, HIRA  
Page 2  
September 1, 2017

overhead. Accordingly, to the extent that you and HIRA do not retract the "CLASS ACTION LAWSUIT" post, and any other posts falsely stating that Mr. Blackburn supports spending 100% of donor funds on overhead only, your conduct demonstrates actual malice.

We trust that you will take appropriate action to mitigate the damage you have already caused and look forward to your removal of the defamatory posts.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ann Correa". The signature is written in a cursive, flowing style.

Ann Correa

cc: Mr. Mark Blackburn  
Shirlene Ostrov, Hawaii Republican Party Chairman



*GARY G. GRIMMER & ASSOCIATES*  
ATTORNEYS

City Financial Tower  
201 Merchant Street, Suite 1940  
Honolulu, Hawai'i 96813  
Phone (808) 457-1330 – Cell (  
Gary@grimmerhawaii.com - [www.GrimmerHawaiiLaw.com](http://www.GrimmerHawaiiLaw.com)

May 31, 2018

Re: MailChimp Abuse – abuse@mailchimp.com

Dear MailChimp,

My law firm represents *Hawaii State Representative Andria Tupola* (“Tupola”) as well as the executive committee members of the *Hawaii Republican Party* (“HRP”). This letter is to demand the immediate termination of a MailChimp account from which my clients and others are receiving spam and hate mail in violation of your *Terms of Use* policies under *Rule 17*, which explicitly states that spam and hateful content are not allowed.

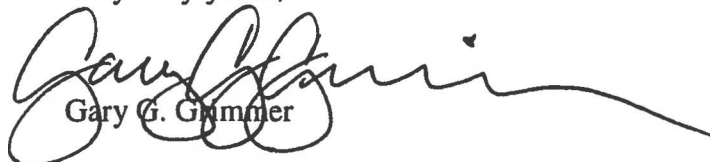
A political action group called the Hawaii Republican Assembly (“HIRA”) and its President, Eric Ryan (“Ryan”), sent spam and hate mail to my clients and others for many years from a Constant Contact account that was terminated just last year for violating the same rules. Now, HIRA and Ryan are harassing my clients by using a MailChimp account connected to their colleague’s URL at [www.johncarroll4hawaii.com](http://www.johncarroll4hawaii.com) to send out spam and hate mail.

Regardless of whether his colleague, John Carroll (“Carroll”), is aware of Ryan using his MailChimp account to send out spam and hate mail to a bulk-list of unsuspecting recipients, the account should be terminated immediately. Carroll is indeed aware of Ryan’s history of harassment, including a recent *Injunction Against Harassment* that was ordered against Ryan (Exhibit 1). The Court found that Ryan was in violation of *Haw. Rev. Stat. §604-10.5* for continually harassing Tupola through email and social media, causing her emotional distress.

For these reasons and to avoid legal action, please terminate the MailChimp account connected to the johncarroll4hawaii.com URL as well as any other MailChimp accounts that may be associated with John Carroll, Eric Ryan and HIRA.

Please call me or email me with any questions and notify me as soon as the account has been terminated.

Very truly yours,

  
Gary G. Grimmer

Enclosure: Exhibit 1



Respondent was present and orally informed of the terms and conditions of this Order, but left the courtroom before receiving a copy of this Order, in violation of the Court's instruction to remain in the courtroom until given a copy of the Order.

The Court has jurisdiction over the parties and this matter and Respondent was provided notice and given the opportunity to be heard.

**THE COURT HEREBY ORDERS THAT:**

1. The Petition For Injunction Against Harassment is granted.
2. Respondent and any other person acting on behalf of Respondent are hereby restrained from:
  - A. Contacting, threatening or harassing Petitioner. Contact includes but is not limited to telephone, cell phone, mail, facsimile, pager, electronic mail, internet, text messages, social networking sites, etc.
  - B. Entering or visiting Petitioner's residence, including yard and garage, or Petitioner's office.
3. The parties or their attorneys shall not be prevented from serving court documents upon each other as authorized by court rules.
4. This Injunction Order is in effect as of May 25, 2018 and shall remain in effect for three (3) years unless terminated or modified by the Court.
5. Special conditions or modifications:
  1. Respondent shall not post items about Petitioner's family members unless they are running for or in political office.
  2. Respondent shall not post photos of Petitioner's family members.
  3. Respondent shall not include Petitioner in any of his e-mail or contact lists.
6. **WHILE THIS INJUNCTION ORDER IS IN EFFECT, RESPONDENT IS PROHIBITED FROM POSSESSING, CONTROLLING, OR TRANSFERRING ANY FIREARM OR AMMUNITION. ANY FIREARM OR AMMUNITION IN THE POSSESSION OR CONTROL OF RESPONDENT MUST BE IMMEDIATELY TURNED OVER TO THE HONOLULU POLICE DEPARTMENT FOR SAFEKEEPING UNTIL THIS INJUNCTION ORDER IS NO LONGER IN EFFECT.**
7. **ANY KNOWING OR INTENTIONAL VIOLATION OF THIS INJUNCTION AGAINST HARASSMENT IS A MISDEMEANOR PURSUANT TO HRS § 604-10.5, WHICH MAY BE PUNISHABLE BY IMPRISONMENT UP TO ONE (1) YEAR AND/OR A FINE UP TO \$2,000. IN ADDITION, ANY VIOLATION OF THE FIREARM AND AMMUNITION PROHIBITION SHALL BE PUNISHABLE AS A MISDEMEANOR OFFENSE UNDER HRS § 134-7.**
8. **THIS INJUNCTION ORDER IS ENFORCEABLE IN ALL 50 STATES, DISTRICT OF COLUMBIA, U.S. TERRITORIES, AND TRIBAL LANDS [18 USC § 2265]. INTERSTATE VIOLATION OF THIS ORDER IS SUBJECT TO FEDERAL CRIMINAL PROSECUTION [18 USC §§ 2261(g), 2261A, AND 2262].**
9. **THE POLICE SHALL ENFORCE THIS INJUNCTION ORDER.**

Dated: Honolulu, Hawai'i, May 25, 2018.

HILARY BENSON GANGNES

Judge



I do hereby certify that this is a full, true, and correct copy of the original on file in this office.

Clerk, District Court of the First Circuit, State of Hawai'i

WARNING HAWAII REPUBLICANS:  
CRIMINAL INVESTIGATIONS INTO HRP  
AND ITS OFFICERS HAVE NOW BEGUN

# CORRUPTION ALERT

from THE HAWAII REPUBLICAN ASSEMBLY

WE CAN'T FIGHT DEMOCRATS HERE IN HAWAII UNTIL OUR OWN HOUSE IS IN ORDER



**Gary G. Grimmer**

---

**From:** >  
**Sent:** Friday, March 8, 2019 3:37 PM  
**To:** Gary G. Grimmer  
**Subject:** Fwd: DOCUMENT SHREDDING AND POINT-THE-FINGER PARTY: Criminal Investigations into Hawaii GOP are Now Underway  
**Attachments:** image001.jpg; image003.jpg; image005.png; HIRAs-Whos-Voice-Is-That-at-HRP-season-01-episode-01.mp3

You are specifically mentioned in this one

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

**From:** **Mark Blackburn** <>  
**Date:** Fri, Mar 8, 2019 at 3:16 PM  
**Subject:** Fwd: DOCUMENT SHREDDING AND POINT-THE-FINGER PARTY: Criminal Investigations into Hawaii GOP are Now Underway  
**To:** <>

Sent from my iPhone  
Mark Blackburn  
1188 Bishop Street  
Suite 2801  
Honolulu, Hawaii 96813  
Mobile:

Begin forwarded message:

**From:** "Hawaii Republican Assembly \\\(HIRA\\)" <legal@hawaiiRepublicanassembly.com>  
**Date:** March 8, 2019 at 2:49:19 PM HST  
**To:** "Steve Yoder" <>, "Gene Ward" <>, "Miriam Hellreich" <>, "Pat Saiki" <patsaiki@gophawaii.com>, "Shirlene Ostrov" <shirlene@gophawaii.com>, "Sam Slom" <>, "Matthew Darnell" <>

><

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>

'Brett

Kulbis

, ""Shirlene Ostrov

**Subject: DOCUMENT SHREDDING AND POINT-THE-FINGER PARTY: Criminal Investigations into Hawaii GOP are Now Underway**

Aloha Hawaii Republicans:

**ENTER HIRA'S BIG CONTEST . . . GUESS THE VOICES + WIN BIG with HIRA's 'Who's Voice Is That?' game!!!!**

Check out this exclusive sneak preview (**attached MP3 file**) of fun-filled excerpts from the criminal conspiracy of corrupt Hawaii GOP officers and crooked RINO state legislators behind closed doors at Hawaii GOP headquarters.

Courtesy of the free teleconferencing service used by the Hawaii GOP for the past two years, you can now enjoy listening to the damning audio and reading the damning transcripts which are cooking the party's highest-flying geese in a boiling pot of self-destructive true confessions which threaten to engulf nearly the entire state party's 'leadership' team.

Start listening to the attached MP3 and see if you can guess the party officers and career politicians who these voices belong to. Don't delay. Be sure to submit your entries **today**.

Those guilty of conspiracy, money laundering, wire fraud, false statements and much, much more are eligible to stay at ClubFed near the Dan Inouye Airport or at one of several related exclusive and highly secure Federal suites with luxury amenities such as stainless steel, all-in-one sink/toilet/fountain as well as complimentary leisure wear. Yes ladies and beta-males, you wear it well. Orange really is the new black.

With the story coming soon from major news media outlets that FBI, FEC and AG investigations are now underway into the Hawaii GOP, once word gets out that party officers and state lawmakers were knowingly and deliberately conspiring together behind closed doors at Hawaii GOP headquarters to break federal and state laws and to cover up past and present violations, there will be nowhere to run and nowhere to hide. No voters will ever trust the corrupt leaders of the Hawaii Republican Party or the state representatives who are up to their eyeballs in crooked lawbreaking.

Yes, the Hawaii GOP is a dysfunctional mess of corruption, incompetence and liberalism. But YOU CAN JOIN IN THE FUN by playing the 'Who's Voice Is That?' game. Law enforcement agencies already know all the voices as they drill down into the cooked books and the off-the-books illegal slush funds. HIRA will be releasing excerpts of audio of these many HRP's criminal conspiracies all Spring and Summer long. So let's see how good your guesses are and help party officers win all expenses paid vacations to Club Fed!! Maybe Ward and McDonut will have to take time away from their illustrious careers as neighborhood celebrities so they can relax in their new orange attire and provide very special services to their alpha-male cellmates (many of whom are Mufi's biggest supporters). Hopefully, when all is said and done, Mark Blackburn and Shirl will get some quality conjugal visit time as well as receiving friendly visitors like Dennis Lennox and other informants who've turned state's evidence.

Gosh, ever since Kevin Dayton's article in the Star-Advertiser a few weeks ago concerning the money laundering and secret HRP executive committee meetings held at party headquarters, HIRA's e-mail has been 'ringing off the hook' from folks wondering about the corruption by Gene Ward, Shirlene Ostrov, Miriam Hellreich, Jane Tatibouet, Bob McDermott and all of Tupola's enforcers who serve as high ranking officers at the Hawaii GOP. Well, this is HIRA's present to all of you. And there are many more presents coming. 2019 will be the best year ever!

**So, send in your entries today and thanks for playing the 'Who's Voice Is That?' game. More chances to win coming soon, especially if Gary "You really shouldn't be shredding that" Grimmer can't convince his clients to come clean and turn themselves in for a getaway at ClubFed. Mahalo and Have a Great Weekend while contemplating what future for the Hawaii GOP could possibly exist under the crooked, liberal, and incompetent Tupola/Ostrov/Ward/McDermott/Frenzel Gang. Whew!!**

--

**Ann Correa, Esq.**  
 169 S. Kukui Street, Suite 202  
 Honolulu, Hawaii 96813  
 Phone: (808) 754-8264  
 E Mail:

*This e-mail message, together with any attachments, is intended only for the use of the individual or entity to which it is addressed. It may contain information that is confidential and prohibited from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination or copying of this message or any attachment is strictly prohibited. If you have received this e-mail in error, please notify the original sender at (808) 754-8264 and destroy this e-mail, along with any attachments. Thank you.*

**Gary G. Grimmer**

---

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Hellreich" < > ; "Pat Saiki" < > ; "Sam Slom" < > ; "Matthew Darnell" < >  
; "Hawaii Hotel Consultants, LLC." < >



"Brett

Kulbis"

"Shirlene Ostrov"

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**Subject: DOCUMENT SHREDDING AND POINT-THE-FINGER PARTY: Criminal Investigations into Hawaii GOP are Now Underway**

Aloha Hawaii Republicans:

**ENTER HIRA'S BIG CONTEST . . . GUESS THE VOICES + WIN BIG with HIRA's 'Who's Voice Is That?' game!!!!**

Check out this exclusive sneak preview (**attached MP3 file**) of fun-filled excerpts from the criminal conspiracy of corrupt Hawaii GOP officers and crooked RINO state legislators behind closed doors at Hawaii GOP headquarters.

Courtesy of the free teleconferencing service used by the Hawaii GOP for the past two years, you can now enjoy listening to the damning audio and reading the damning transcripts which are cooking the party's highest-flying geese in a boiling pot of self-destructive true confessions which threaten to engulf nearly the entire state party's 'leadership' team.

Start listening to the attached MP3 and see if you can guess the party officers and career politicians who these voices belong to. Don't delay. Be sure to submit your entries **today**.

Those guilty of conspiracy, money laundering, wire fraud, false statements and much, much more are eligible to stay at ClubFed near the Dan Inouye Airport or at one of several related exclusive and highly secure Federal suites with luxury amenities such as stainless steel, all-in-one sink/toilet/fountain as well as complimentary leisure wear. Yes ladies and beta-males, you wear it well. Orange really is the new black.

With the story coming soon from major news media outlets that FBI, FEC and AG investigations are now underway into the Hawaii GOP, once word gets out that party officers and state lawmakers were knowingly and deliberately conspiring together behind closed doors at Hawaii GOP headquarters to break federal and state laws and to cover up past and present violations, there will be nowhere to run and nowhere to hide. No voters will ever trust the corrupt leaders of the Hawaii Republican Party or the state representatives who are up to their eyeballs in crooked lawbreaking.

Yes, the Hawaii GOP is a dysfunctional mess of corruption, incompetence and liberalism. But YOU CAN JOIN IN THE FUN by playing the 'Who's Voice Is That?' game. Law enforcement agencies already know all the voices as they drill down into the cooked books and the off-the-books illegal slush funds. HIRA will be releasing excerpts of audio of these many HRP's criminal conspiracies all Spring and Summer long. So let's see how good your guesses are and help party officers win all expenses paid vacations to Club Fed!! Maybe Ward and McDonut will have to take time away from their illustrious careers as neighborhood celebrities so they can relax in their new orange attire and provide very special services to their alpha-male cellmates (many of whom are Mufi's biggest supporters). Hopefully, when all is said and done, Mark Blackburn and Shirl will get some quality conjugal visit time as well as receiving friendly visitors like Dennis Lennox and other informants who've turned state's evidence.

Gosh, ever since Kevin Dayton's article in the Star-Advertiser a few weeks ago concerning the money laundering and secret HRP executive committee meetings held at party headquarters, HIRA's e-mail has been 'ringing off the hook' from folks wondering about the corruption by Gene Ward, Shirlene Ostrov, Miriam Hellreich, Jane Tatibouet, Bob McDermott and all of Tupola's enforcers who serve as high ranking officers at the Hawaii GOP. Well, this is HIRA's present to all of you. And there are many more presents coming. 2019 will be the best year ever!

**So, send in your entries today and thanks for playing the 'Who's Voice Is That?' game. More chances to win coming soon, especially if Gary "You really shouldn't be shredding that" Grimmer can't convince his clients to come clean and turn themselves in for a getaway at ClubFed. Mahalo and Have a Great Weekend while contemplating what future for the Hawaii GOP could possibly exist under the crooked, liberal, and incompetent Tupola/Ostrov/Ward/McDermott/Frenzel Gang. Whew!!**

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