

July 3, 2024

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Gene Ward
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Honolulu, HI 96825
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Re: Cease and Desist Notice

Aloha Ms. Nakanelua and Mr. Ward,

Allow me to introduce myself. My name is Mark Ziebold and I am an attorney who represents the Hawaii Republican Party (hereinafter "HRP"). This letter serves as a formal notice to both of you regarding certain actions that you have taken and continue to take against the winners of a certain auction involving tickets to the Republican National Convention (hereinafter "RNC") scheduled for July 14-18, 2024. Those winners are Andy Crossland, Lynn Surayna, and any additional people pursuant to the additional direction of the disbursement of the State Chairs portion of the allocated tickets (1 personal pass and 4 additional tickets) per section 28 of the RNC rules. Per your email agreement, the auction that these individuals won regarding these tickets is binding upon the Hawaii Republican Party and your actions to disrupt the winners use of the tickets are creating possible liabilities for the HRP.

As you are aware, after agreement amongst you and the other leadership of the HRP, the tickets were legally won by the aforementioned individuals through an auction process, with the only stated requirement of the auction that the winners must be members of the Hawaii Republican Party. There was no mention or indication of any vetting process required for the winners. The two individuals who won the tickets are verified members of the Hawaii Republican Party and were duly credentialed as State delegates at the HRP State Convention.

Furthermore, it has come to the attention of the HRP that the delegation of three, which you have referenced, does not exist in the bylaws of either the HRP or the RNC. This delegation appears to have been arbitrarily developed after the auction results were announced. According to Hawaii DCCA and Hawaii statutes, the auction process conducted is legal and binding and any actions to the contrary by the HRP or any other person will likely bring liability upon the HRP or those persons. Note that the actions taken by both of you to challenge the legitimacy of the auction results were not authorized by the HRP. On the contrary, the HRP's supervising body voted 23-8 in favor of instructing you to cease and desist from further actions against the winners. Moreover, a State Executive Committee meeting held on July 2nd, 2024, resulted in an 8-3 vote to pursue legal cease and desist measures due to your non-compliance with the directive from the Hawaii Republican State body.

In light of the above, you are hereby directed to:

1. Cease and desist any and all actions against the auction winners concerning the Republican National Convention tickets.
2. Refrain from creating or referencing any unauthorized delegations that are not recognized by the official bylaws.
3. Comply with the directives issued by the Hawaii Republican Party's supervising body and the State Executive Committee.

Failure to comply with this cease and desist notice may result in further legal action to enforce the directives of the Hawaii Republican Party. We trust that you will adhere to this notice and respect the integrity of the auction process and the decisions made by the HRP's leaders. If you have any questions about the above, please feel free to contact me at 949-788-1819 or at mark@zieboldlaw.com. Furthermore, if you have any legal counsel that this cease and desist notice should be directed to, please provide their contact information and it will be directed to that attorney.

Sincerely,



Mark Ziebold
Attorney at Law