

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT
STATE OF HAWAII

Electronically Filed
FIRST CIRCUIT
1CCV-25-0000852
23-MAY-2025
01:03 PM
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CHRISTINA EVERETT,

Plaintiff,

vs.

HAWAII REPUBLICAN PARTY, TAMARA McKAY, NOLAN CHANG, SHERYL
BIELER, ENOKA-SHAYNE BINGO, and TERI SAVAIINAEA,

Defendants.

CIVIL NO. 1CCV NO. 250000852

COMPLAINT FOR DEFAMATION, TORTIOUS INTERFERENCE, CIVIL
CONSPIRACY, AND INJUNCTIVE RELIEF; DEMAND FOR JURY TRIAL;
DECLARATORY AND OTHER RELIEF

1ST CIRCUIT COURT
STATE OF HAWAII
FILED
1CCV NO. 250000852
2025 MAY 23 PM 1:03
S. FUJIMOTO
CLERK

Plaintiff CHRISTINA EVERETT, pro se, brings this complaint against the above-named
Defendants and alleges as follows:

PARTIES

1. Plaintiff CHRISTINA EVERETT is a resident of Waipahu, Hawaii and a declared candidate for Hawaii State House District 35.
2. Defendant HAWAII REPUBLICAN PARTY is a political organization operating in the State of Hawaii.
3. Defendants TAMARA McKAY, NOLAN CHANG, SHERYL BIELER, ENOKA-SHAYNE BINGO, and TERI SAVAIINAEA are officers, agents, or representatives acting under the authority or color of the Hawaii Republican Party.

JURISDICTION AND VENUE

4. Jurisdiction is proper pursuant to the laws of the State of Hawaii.

5. Venue is proper in the Circuit Court of the First Circuit, State of Hawaii, as the acts complained of occurred in the City and County of Honolulu.

FACTUAL ALLEGATIONS

6. Plaintiff is a candidate for public office and has actively participated in Republican Party activities.

7. On or around May 22, 2025, Defendant SHERYL BIELER, using her official '@gophawaii.com' email address, distributed or published Plaintiff's personal legal information to other party members with the intent to discredit her candidacy.

8. Such statements were made with malice and without regard to the truth or the full context of Plaintiff's background, which she has publicly disclosed in her published works.

9. Defendant Teri Savaiinaea was notified of these communications and concerns, yet failed to intervene or ensure a fair process. She allowed or contributed to the continued harm suffered by the Plaintiff.

10. Defendants collectively failed to intervene, supported the defamatory content, and harmed Plaintiff's reputation, candidacy, and personal wellbeing.

CAUSES OF ACTION

COUNT I: DEFAMATION

11. Plaintiff incorporates paragraphs 1–10 as if fully set forth herein.

12. Defendants' statements were false, malicious, and intended to cause political and reputational harm to the Plaintiff.

13. Plaintiff has suffered significant harm to her public reputation, emotional well-being, and campaign efforts.

COUNT II: TORTIOUS INTERFERENCE WITH PROSPECTIVE ADVANTAGE

14. Plaintiff incorporates paragraphs 1–13 as if fully set forth herein.

15. Defendants knowingly interfered with Plaintiff's political campaign, community support, and credibility.

COUNT III: CIVIL CONSPIRACY

16. Plaintiff incorporates paragraphs 1–15 as if fully set forth herein.

17. Defendants acted in concert to discredit Plaintiff and suppress her political campaign through coordinated defamatory actions.

DAMAGES AND RELIEF REQUESTED

18. Plaintiff seeks general, special, and punitive damages in excess of \$100,000 for reputational harm, emotional distress, and campaign-related losses.

19. Plaintiff also seeks injunctive relief barring Defendants from further defamatory actions.

20. Plaintiff seeks declaratory relief affirming her right to fair and equal participation in political activities and protections under the law.

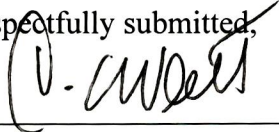
PRAYER FOR RELIEF

- WHEREFORE, Plaintiff respectfully requests that this Court:
 - a. Enter judgment against Defendants for compensatory and punitive damages;
 - b. Grant injunctive relief to prevent future defamatory or retaliatory conduct;
 - c. Award costs, court filing fees, and such other relief as is just and proper;

Plaintiff demands a trial by jury on all issues so triable.

DATED: Honolulu, Hawaii, May 23, 2025.

Respectfully submitted,



CHRISTINA EVERETT

Pro Se Plaintiff

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