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FIRST CIRCUIT COURT
STATE OF HAWAII
FILED

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T. Kaya
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CLERK

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Electronically Filed
FIRST CIRCUIT
1CCV-25-0000852
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IN THE CIRCUIT COURT OF THE FIRST CIRCUIT
STATE OF HAWAII

CHRISTINA EVERETT
Plaintiff,

Case NO. 1CCV-25-0000852

vs.

**MEMORANDUM IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS, DECLARATION OF
TAMARA MCKAY, DECLARATION
OF SHERYL BIELER, DECLARATION
OF ENOKA-SHAYNE BINGO,**

TAMARA MCKAY, SHERYL
BIELER, ENOKA-SHAYNE
BINGO, NOLAN CHANG,
TERI SAVAIINAEA and THE
HAWAII REPUBLICAN PARTY
Defendants.

MEMORANDUM IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

DEFENDANTS, Tamara McKay, Sheryl Bieler, and Enoka-Shayne Bingo (collectively, “Defendants”) Sui Juris, pursuant to Rule 12(b)(6) of the Hawaii Rules of Civil Procedure (HRCPP), respectfully submit this Memorandum in Support of their Motion to Dismiss Plaintiff Christina Everett’s Complaint with prejudice for insufficiency of service and for failure to state a claim upon which relief can be granted.

I. INTRODUCTION

Plaintiff Christina Everett (“Plaintiff”) filed this action alleging defamation and tortious interference with prospective economic advantage against Defendants, among others, claiming that an email sent and corroborated by one or more Defendants defamed her and interfered with her pursuit for public office as a “Declared Candidate”. Defendants Tamara McKay, Sheryl Bieler and Enoka-Shayne Bingo move to dismiss the Complaint with prejudice under HRCPP Rule 12(b)(6) because: (1) the alleged defamatory email does not constitute such content as a matter of law; (2) Plaintiff’s claims of ongoing defamation are self-projected and stem from her own actions, including publicly slandering Defendants; (3) Plaintiff’s conduct at the State Convention, including her social media activity on Facebook and Instagram, interfered with an internal election process, negating her tortious interference claim.

II. STATEMENT OF FACTS

1. Plaintiff filed her Complaint on May 23rd, 2025, alleging defamation and tortious interference with prospective economic advantage based on an internal email response sent by Defendant Sheryl Bieler. *[See, Exhibit A, lines 3-13]*
2. The email in question, as referenced in the Complaint and included in the Defendants Exhibit List A-D, contains no false or defamatory statements about Plaintiff. Instead, it addresses a true event in a Star Advertiser News Article of the Plaintiffs’ prior arrest for smuggling 9 tons of fireworks into Hawaii and lying, as a minister, to then Assistant U.S Attorney Darren Ching *[See, Exhibit B, lines 8-14]*. The response email was an internally distributed document, among party officers, the Plaintiff and her associates and does not meet the legal threshold for defamation. *[Exhibits A-D, entirely]*
3. Plaintiff’s own actions, including threats of public outcry *[Exhibit C, lines 7-17]* and social media posts on Instagram and Facebook *[Exhibit J, entirely]*, along with her and her associate’s actions and behavior during the State Convention, smeared Defendants and disrupted internal election processes, causing reputational and operational harm. *[See, Declaration of Tamara McKay, points 8-12]*
4. The plaintiff’s exacerbation of the matter, as evidenced *[see, Exhibits J, Declaration of Tamara McKay, 8-12]*, demonstrates that any alleged defamation, ongoing harassment, or

interference was self-inflicted, as her public accusations and behavior were the proximate cause of any harm she claims.

5. Defendants have suffered significant harm due to Plaintiff's actions, including tortious interference of the State Chair election within The Hawaii Republican Party. [See, *Declaration of Tamara McKay*] reputational harm, loss of work and sleep in pursuit to substantially comply with proper court procedures, interference in an internal election, public humiliation, mental anguish and physical distress. These claims of grievance are discernable from the actions of the Plaintiff in her process and social media posts [See, *Exhibit J, entirely*].
6. Plaintiff's Complaint fails to plead sufficient facts to establish the elements of defamation, ongoing harassment, tortious interference, or appropriate legal jurisdiction to address this issue within this Honorable Court, as outlined below.

III. LEGAL STANDARD

Allegations of actual malice and false statements are elements of cause of action for defamation involving public figures. *Fong v. Merena* 655 P.2d 875 (1982).

Under HRCF Rule 12(b)(6), a motion to dismiss for failure to state a claim upon which relief can be granted should be granted when the complaint fails to allege facts that, if true, would entitle the plaintiff to relief. *Cahill v. Hawaiian Paradise Park Corp.*, 56 Haw. 522, 543 P.2d 1356 (1975).

The court accepts the allegations as true but need not accept conclusory statements or legal conclusions. Conclusory contentions unsupported by factual allegations are insufficient. *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007).

In Hawaii, dismissal with prejudice is appropriate when amendment or refiling would be futile because the claims are legally deficient. RCCH Rule 12(q).

The Plaintiff failed to properly serve all named Defendants of her complaint with a summons in accordance with procedures laid forth in HRCF Rule 4(d). The Summons is an integral part of the delivery of a complaint to the Defendants. *Eto v. Muranaka*, 121 Haw. 447, 220 P.3d 1025 (2009).

IV. ARGUMENT

A. Plaintiff's Defamation Claim Fails as a Matter of Law

To state a claim for defamation in Hawaii, a plaintiff must prove: (1) a false statement of fact; (2) publication to a third party; (3) fault (negligence or actual malice); and (4) resulting harm. *Cahill v. Hawaiian Paradise Park Corp.*, 56 Haw. 522, 543 P.2d 1356 (1975) states, *malice requires*

intent to injure, supported by evidence of personal animus or reckless disregard for truth. Plaintiff's Complaint fails to meet these elements for the following reasons:

1. **No False Statement of Fact:** The email referenced in the Complaint [*Exhibit A-D*] contains no false or defamatory statements about Plaintiff, as explained above in section 2 of the Statements of Facts provided in this Memorandum. Under Hawaii law, a statement must be objectively false and damaging to reputation to be defamatory. *Beamer v. Nishiki (1985)* This internally distributed email does not meet this standard, as it contained objectively true news articles and lacked defamatory content. [*See, Exhibit A-D*]
2. **Plaintiff's Self-Projected Action:** Plaintiff's claim of defamation is self-projected. Her own public statements, actions and social media posts [*See, Exhibit J*], which smeared Defendants and disrupted the State Convention, created any perceived reputational harm. The plaintiff cannot attribute her self-inflicted harm to Defendants and as a result, committed the very acts that she accuses the Defendants of committing, such as harassment, attempted character assassination, defamation and tortious incidents.
3. **No Harm Attributable to Defendants:** Any harm to Plaintiff's reputation stems from her own actions, not from Defendants' emails. The Complaint fails to allege specific harm caused by the email, relying instead on conclusory assertions, which are insufficient under HRCF Rule 12(b)(6). Given the absence of a false or defamatory statement, the defamation claim is legally deficient and must be dismissed with prejudice, as amendment would be futile.

B. Plaintiff's Tortious Interference Claim Fails as a Matter of Law

To state a claim for tortious interference with prospective economic advantage in Hawaii, a plaintiff must prove: (1) the existence of a prospective contract, or business relationship; (2) intentional and improper interference by the defendant; (3) causation; and (4) damages. *Haw. Med. Servs. Ass'n v. Nitta, 127 Haw. 343, 278 P.3d 432 (2012)*. Plaintiff's claim fails for the following reasons:

1. **No Improper Interference:** The email [*See, Exhibit A & D*] does not constitute improper interference with any contractual business relationship.
2. **Plaintiff's Own Conduct Caused Harm:** Plaintiff's threats of public outcry [*see, Exhibit C*] actions at the State Convention, disruptive Facebook posts with 96+ people tagged, therefore available for those 96 people's friends to see the post on the 96+ timelines [*See, Exhibit J*], interfered with internal election processes, the public relationship of the Defendants within their communities, undermining her claim that Defendants caused her economic harm.

3. **Lack of Causation and Damages:** The Complaint fails to allege specific facts showing a causal link between the email and any lost contractual agreements or economic opportunities. Conclusory allegations of harm are insufficient. The tortious interference claim is legally insufficient and cannot be cured by amendment, warranting dismissal with prejudice. *Kutcher v. Zimmerman* 87 Haw. 394, 957 P.2d 1076

4.

C. Plaintiff's Actions Caused Harm to Defendants

Far from suffering harm, Plaintiff's conduct caused significant harm to Defendants Tamara McKay, Sheryl Bieler, and Enoka-Shayne Bingo, including obstruction of process and election interference, mental anguish, physical distress, and severe loss of sleep and wages. Plaintiff's baseless lawsuit and public smearing of Defendants via social media and other actions have imposed substantial burdens, demonstrating the vexatious nature of her claims. This further supports dismissal with prejudice, as Plaintiff's allegations are not only unsupported but have caused undue harm to Defendants.

Request to Dismiss with Prejudice: Given the possibility of revisiting a pursuit, if the Plaintiff should lose her run for public office, the Defendants respectfully request the Honorable Court dismiss this case with prejudice. Defendants refuse any responsibility for what the Plaintiffs own actions and behavior might cause and any damage that occurred to the Plaintiff from her public displays. This pursuit, being publicized by the Plaintiff and only the Plaintiff, has nothing to do with the actions of the Defendants, as there have been zero public displays or defamatory remarks from the Defendants. The Defendants are hopeful this request is justifiable and respectfully urge Honorable Judge Nichols to consider dismissal with prejudice.

Request for Public Statement of Apology and Injunctive Relief: Given the displays put forth by the Plaintiff and the harm to efforts of public volunteering and stewardship, the Defendants respectfully request the court to order the Plaintiff to revisit the steps taken to defame the Defendants, remove all slander and libelous posts targeting Defendants and issue a public apology within 24 hours, tagging those previously collaborated to the posts. Defendants also request the Honorable Court to bar all future defamation made by the Plaintiff regarding the Defendants. The Defendants are hopeful this request is justifiable and respectfully urge Honorable Judge Nichols to consider ordering the Plaintiff's public statement of apology.

Request for Reimbursement of out-of-pocket costs: The Defendants are self-represented and financially constrained. If the Honorable Court deems it fit, the Defendants respectfully request the reimbursement of out-of-pocket costs totaling 1,000USD for producing copies, paying of fees, gas and mileage, printing supplies, consults and research, etc. accrued during this time.

V. CONCLUSION

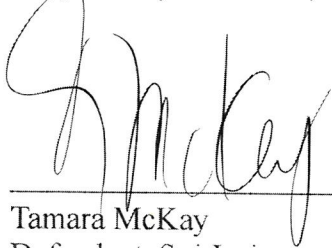
WHEREAS Plaintiff's Complaint fails to state a claim for defamation or tortious interference, the email in question is not defamatory, Plaintiff's alleged harm is self-inflicted, causing a significant amount of reputational and emotional distress to the Defendants, the claims are legally deficient and cannot be cured by amendment, justifying dismissal with prejudice;

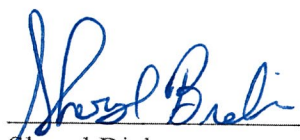
Defendants respectfully request the Court consider awarding any possible Special or General Damages, or a Reimbursement of out-of-pocket costs equating to \$1,000.00 per Defendant, to compensate for the financial strain and burden this unwanted pursuit has cost the Defendants.

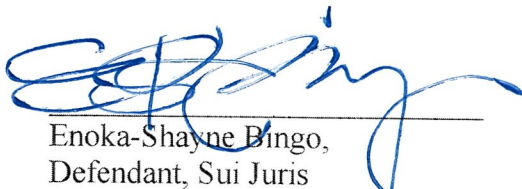
If the Honorable Court deems it equitably fit and in pursuit of justice, based on the evidence provided, Defendants respectfully request the court grant injunctive relief to bar any and all future defamation by Plaintiff and in order to address the harm caused by her actions, award a public apology to Defendants within 24 hours and order all prior collaborators within the defaming posts made, be tagged into the Plaintiff's public apology statement by Plaintiff, in a noble attempt to undo the libel spread with the Plaintiff's collaborative actions on social media.

DATED: Honolulu, Hawaii, July 03, 2025.

Respectfully submitted,



Tamara McKay
Defendant, Sui Juris

Sheryl Bieler
Defendant, Sui Juris

Enoka-Shayne Bingo,
Defendant, Sui Juris

DECLARATIONS

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IN THE CIRCUIT COURT OF THE FIRST CIRCUIT
STATE OF HAWAII

CHRISTINA EVERETT
Plaintiff,

Case NO. 1CCV-25-0000852

Vs.

TAMARA MCKAY, SHERYL
BIELER, ENOKA-SHAYNE
BINGO, NOLAN CHANG,
TERI SAVAIINAEA and THE
HAWAII REPUBLICAN PARTY
Defendants.

Declaration of Tamara McKay

I, Tamara McKay, submit this Declaration to be included within the Memorandum in support of the defendants' Motion to Dismiss and to clarify facts, procedure, and governing authority relevant to the dispute initiated by the Plaintiff Christina Everett.

1. I am a resident of the County of Maui, State of Hawai'i, and one of the named Defendants in this case. I served as the duly elected State Chair of the Hawai'i Republican Party (HRP) from September 2023 through May 2025.

2. As State Chair, I was responsible for overseeing all party functions by the HRP Bylaws, County rules and applicable state and federal laws.

3. On May 21, 2025, Christina Everett emailed a grievance alleging rights violations and self-identified as a candidate. However, the Hawai'i Campaign Spending Commission records confirm she did not formally register as a candidate until May 22, 2025, at 1:20 PM (Ex. F), lines 3, 7, and 26.

4. Ms. Everett's grievance was reviewed and determined not to demonstrate any violation of the bylaws. A formal response denying the grievance was issued (Ex. E). Ms. Everett (Ex. E lines 1-13) failed to follow the required internal due process under Article VI, Section B of the HRP Bylaws and Article III, Section D of the Honolulu County Republican Party Rules.

5. Delegate credentialing for the State Convention follows a defined process. Under Article The Precinct President appoints, Section 2 of the HRP Bylaws, delegates, or, if none exists, by the District Chair. Delegate appointments were completed in February 2025, during the properly held precinct elections per HRP procedures.

6. The plaintiff was not an elected official and did not qualify as an automatic delegate. She had no enforceable right to be credentialed.

7. All HRP members agree to follow the bylaws per Article II, Section A. If Ms. Everett did not agree to or check the box to accept these bylaws during her membership registration, She would not be eligible to be a valid member, nor to benefit from or challenge under HRP's organizational procedures and privileges.

8. Ms. Everett circumvented internal procedures and escalated an internal disagreement into a public legal spectacle.

9. On May 24-25, 2025, during the HRP State Convention, Ms. Everett's legal documents, A formal grievance and civil complaint were served by Sheila Medeiros in front of party delegates. I refused to sign. This action was disruptive and calculated to influence delegate sentiment and the outcome of my re-election bid. There was no "summons" provided, therefore rendering initial service "defective per HRCP rule 4(d)" (Ex. H, I).

10. During the first half of the convention, the plaintiff defied the bylaws and her prior, mutually agreed upon understanding that she was not a delegate and sat with the delegates, which impacts voter count, and proceeded to sit with the delegates to vote, to which the The convention was forced to pause while she and other guests moved out of the delegates' section into the designated guest section of the auditorium

11. After the convention, Ms. Everett continued her public campaign via social media, making defamatory and misleading claims against me and other party officers (EX. J).

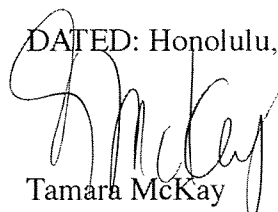
12. These actions resulted in reputational harm, emotional distress, and disruption of the party business.

13. Key events relevant to this matter occurred as follows:

- **February 2025:** Precinct elections held; delegates appointed in compliance with HRP Bylaws.
- **May 21, 2025:** Plaintiff emails grievance and falsely claims candidacy (EX. G), lines 3-6.
- **May 22, 2025, 1:20 PM:** CSC filing submitted (EX. F), lines 3, 7, and 26.
- **May 23, 2025:** Grievance letter sent, bypassing District and County Chairs.
- **May 24–25, 2025:** Disruptive legal service during State Convention.
- **Post-Convention:** Multiple defamatory social media posts published (EX. J).

Based on these facts and exhibits, I respectfully request that the Court consider the entirety of the procedural violations and public misconduct in dismissing the complaint With prejudice.

DATED: Honolulu, Hawai'i, July 2, 2025.


Tamara McKay
Pro Se Defendant

DECLARATION OF SHERYL BIELER

I, Sheryl Bieler, declare as follows:

1. I am a resident of the County of Honolulu and a named Defendant in Case No. 1CCV-25-0000852, and a member of the Hawaii Republican Party.
2. On or about May 22, 2025, I sent an internal email response to the Plaintiff, her associate, officers of the Hawaii Republican Party, including co-defendants Enoka-Shayne Bingo, Tamara McKay, Nolan Chang, and Teri Savaiinaea with a sarcastic remark, "oooh everyone look what I found.." [Exhibit A, line 3-13]
3. The email attachment referenced a public news article from the Honolulu Star-Advertiser reporting the Plaintiff's arrest for smuggling 9 tons of fireworks and as a minister, lying after she got caught. [Exhibit B, line 8-14] The email's sarcastic remark was directed to her threats of public shaming and to alert party leadership to the Plaintiff's actions, which I perceived as a threat to the Party's reputation.
4. The Plaintiff, Christina Everett, in her previous email, threatened the Hawaii Republican Party with public smearing and called for the removal of a newly elected chair, which was out of line with party procedures. These threats were made via email [Exhibit C, line 7-17] to party officers, including myself, asserting that she would expose alleged misconduct unless her demands were met. My intent was to facilitate a response to her threats, not to harm her reputation, which was unlikely, as it was an internal email, not a public matter.
5. Sarcasm Does Not Constitute Malice- The phrase "oooh everyone look what I've found.." was a sarcastic response, not a statement of malice or ill will, as I explained in my follow up email [Exhibit D lines 12-13]. Cahill v. Hawaiian Paradise Park Corp., 56 Haw. 522, 543 P.2d 1356 (1975), *malice requires intent to injure, supported by evidence of personal animus or reckless disregard for truth*. Sarcasm, as a form of rhetorical expression, does not meet this threshold, especially when the underlying fact of her arrest is true and publicly shared as she mentioned. The email was sent to a limited group with a shared interest, reinforcing its privileged nature under Cahill, supra. 5. Legal Compliance and Privilege. The email was an internal communication among party officers, protected by a qualified privilege under HRCP Rule 12(b)(6) and Cahill, supra, as it addressed governance matters. The Hawaii Republican Party Bylaws, Article VIII, Section 2, mandates officers to

safeguard the Party's integrity, which I acted to uphold by highlighting the Plaintiff's public actions. The email's distribution was not intended for public dissemination, further negating defamation liability.

6. The Plaintiff's Civil Complaint filed on May 23, 2025, alleging defamation and tortious interference, was served without a summons, violating HRCP Rule 4(d), rendering service defective under HRCP Rule 12(b)(5). Her claims lack merit, as my email contained no false statement and caused no actionable harm. Her public escalation (e.g., Facebook posts and conduct at the State Convention) appears to be the source of any damage, not my internal communication.
7. Attached hereto as Exhibit A is a true and correct copy of the email sent on May 22, 2025. Attached as Exhibit B is a copy of the Honolulu Star-Advertiser article dated Thursday, January 21, 2010. I affirm these documents are authentic.
8. Given the context of this matter and the evidence submitted, I am respectfully requesting this Honorable Court consider the entirety of the harm caused by the Plaintiff and grant the Defendant's Motion to Dismiss with Prejudice, as well as the relief requested in the Memorandum in Support of the Defendants' Motion to Dismiss.
9. I declare under penalty of perjury under the laws of the State of Hawaii, that the foregoing is true and correct to the best of my knowledge and belief.

Executed on this 3rd day of July, 2025.



Sheryl Bieler

Defendant, Sui Juris

95-1060 Lehiwa Dr.

Apt. B2306

Mililani, Hi, 96789

Sherylbielerin808hawaii@gmail.com

(808)375-1753

DECLARATION OF ENOKA-SHAYNE BINGO

I, Enoka-Shayne Bingo, declare as follows:

1. I am over the age of eighteen and am competent to testify as to the matters herein.

The following is based on personal knowledge.

2. On May 24, 2025, a process server handed me a copy of the Complaint filed in the aforementioned matter along with a "formal grievance" without a summons.

I, Enoka-Shayne Bingo, declare under penalty of perjury under the laws of the State of Hawaii that the foregoing is true and correct.

Dated: July 03, 2025, Honolulu, Hawaii.



Enoka-Shayne Bingo

PO Box 1084

Kailua, HI, 96734

Shaynebingo@gmail.com

(808)393-0810

EXHIBIT LIST CONTENTS

Exhibit A- Email Response from Defendant Sheryl Bieler, "Alleged Defamation"

Exhibit B- Star Advertiser Article Attached to "Exhibit A" Email Response

Exhibit C- Plaintiff's Initial Email, Threatens Public Smearing

Exhibit D- Defendant Sheryl Bieler's Second Response, Explains Her Intent

Exhibit E- Defendant Tamara McKay's Email re: Procedural Steps Per Bylaws

Exhibit F- CSC Filing Date re: Plaintiffs False Declaration of Candidacy Prior to

Exhibit G- Plaintiff Email Grievance, Falsely Claims Declared Candidacy

Exhibit H- Acknowledgement and Return of Service. No Summons Recorded.

Exhibit J- Defamatory social media posts Published to 96+ Pages/Timelines.

Exhibit K: Case Citations Pertinent to "Internal Party Matters"

Email by Defendant Sheryl Bieler, which Plaintiff Christina Everett alleges as defamatory.

On Thu, May 22, 2025 at 4:36 PM VP
Coalitions

<coalitionshrp@gophawaii.com> wrote:

Oooh everyone look what I just found out about Christina Everett. Anybody else want to know about this. Christina I'm sure the news and Social Media would love to get their hands on this as you are a declared candidate for District 35

Woman gets 6 months for importing illegal fireworks

By

POSTED: Thursday, January 21, 2010

A federal judge sentenced a 34-year-old woman to six months in prison today for trying to import more than 4 tons of illegal aerial fireworks and then lying to federal agents about it.

Christina Everett, who pleaded guilty Sept. 29 to the charge of importing explosive material without license, could have gotten 15 months in prison.

In 2007, Everett attempted to import 9,000 pounds of aerial fireworks into Hawaii without a license or a place to store them.

When federal agents questioned her about it, she told them she had an agreement with Mayor Mufi Hannemann and a state senator for the fireworks to be used in a fireworks show, said Assistant U.S. Attorney Darren Ching.

The mayor's office said the office never spoke with Everett, said District Judge Susan Mollway.

Ching requested Everett serve 15 months because she lied to federal agents after she was caught.

"She's a minister," he said. "That concerns me ... ministering to others and still lies when she feels it's convenient."

Instead, Mollway sentenced Everett to 6 months, saying she showed she was trying to turn her life around with a regular job and complying with her bail.

"I'm scared," Everett told the judge before her sentencing. "I don't know what's going to take place, who's going to take care of my 6-year-old."

Everett is a minister with the Salvation Army's Ray and Joan Kroc Corps Community Center that will be built in Leeward Oahu.

"She's an excellent employee," Bron Bagoria, Everett's boss at the Kroc Center, told Mollway.

MAY 23 AT 6:08 AM

Star Bulletin news article of January 21, 2010 about Plaintiff's previous criminal offense.

Woman gets 6 months for importing illegal fireworks

By

POSTED: Thursday, January 21, 2010

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The mayor's office said the office never spoke with Everett, said District Judge Susan Mollway.

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"She's an excellent employee," Brom Begonia, Everett's boss at the Kroc Center, told Mollway.

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500 Ala Moana Blvd. #7-210, Honolulu, HI 96813 808-529-4747

B - EXHIBIT B

EXHIBIT C

Excerpts of Plaintiff's email to Defendants McKay, Bingo and Chang explaining her intent to take information to local media outlets.

It is also profoundly discouraging to see how power struggles are taking precedence over unity. We have lost focus. This is no longer about serving the people of Hawai'i—it is about controlling positions. That is not why I joined this Party, and it is not what the public expects of us.

Again, That is unacceptable.

There are still open delegate seats in District 35, and I, an active candidate, was overlooked with no valid explanation. Vague discretion cannot be used to shield poor leadership or political maneuvering.

I ask again: Where do we go from here?

If this issue is not taken seriously and resolved with integrity, I will take it to the public. The people of Hawai'i deserve to know what kind of leadership is operating behind closed doors.

This message is direct and unapologetic, because silence no longer serves truth.

"The people of District 35 deserve proactive leadership and transparent party representation," said Everett. "I am committed to standing for accountability and empowering grassroots Republicans throughout the state."

The campaign is calling for Bingo's removal and immediate reform to restore confidence in local party leadership.

Media Contact: KHON2. HAWAII NEWS NOW, CIVIL BEAT, HUNGRY HUNGRY HAWAIIANS. ALL SOCIAL MEDIA OUTLETS

Sincerely,
Christina Everett
Candidate, House District 35
[Quoted text hidden]

Press Release

FOR IMMEDIATE RELEASE

****Republican Candidate Christina Everett Files Complaint Against District Chair Over Misconduct and Neglect****

WAIPAHU, HAWAII – Christina Everett, candidate for State Representative in District 35, has filed a formal complaint with the Hawai'i Republican Party citing dereliction of duty by District Chair Enoka-Shayne Bingo. The complaint outlines repeated non-responsiveness, failure to guide delegate selection, and systemic neglect that has impacted Republican participation in the district.

"The people of District 35 deserve proactive leadership and transparent party representation," said Everett. "I am committed to standing for accountability and empowering grassroots Republicans throughout the state."

The campaign is calling for Bingo's removal and immediate reform to restore confidence in local party leadership.

Media Contact: KHON2. HAWAII NEWS NOW, CIVIL BEAT, HUNGRY HUNGRY HAWAIIANS. ALL SOCIAL MEDIA OUTLETS

C - EXHIBIT C

Email excerpt to Plaintiff, Christina Everett from Defendant, Sheryl Bieler.



Subject: Formal Complaint Against District Chair Enoke-Shayne Bingo – District 35, Public Statement, and Request for Bylaws Clarification

message

Thu, May 22, 2025 at 5:14 PM

'P Coalitions <coalitionshrp@gophawaii.com>

o: Christina Everett <ceverett56@gmail.com>

c: Nolan Chang <nolan.chang88@gmail.com>, Hawaii Republican Party <HRPchair@gophawaii.com>, Enoke-Shayne Bingo shaynebingo@gmail.com>, Sharlene Mata <sharlene.mata@gmail.com>, Teri Savaiinaea <tsavaiinaea@gophawaii.com>, HRP State Secretary Leslie Jones <secretary@gophawaii.com>, Nelson Sua <nsua@outlook.com>, Brett Kulbis <brett.kulbis@use.startmail.com>, Shirlene Santiago-Ostrov <sdostrov@aol.com>, adhannemannsenatehi@gmail.com, James Wallace <diehd49@yahoo.com>, Kara England theradicalhale@gmail.com>, Tammy Ash Perkins <tammyaperkins@protonmail.com>, Suzie Martinson suziemartinson@protonmail.com>, lobendahnk@gmail.com, Nayna Patel <nayna_p@aol.com>, Ceci Febrero <Pepelapue75@yahoo.com>, Chanara Casey Richmond <chanaracaseyrichmond@gmail.com>, LIANA CORTEZ-KEKAWA <lianamcortezkekawa442@yahoo.com>, Manndi <district39hi@gmail.com>, R Ruiz <district40r@gmail.com>, Juli Lester <alohajulez@gmail.com>, Andrea Rodgers HIANDEA808@gmail.com>, Jennifer Hunt <communications@gophawaii.com>, Diamond Garcia <diamondean1844@gmail.com>, Davic lcos <repalcos41@gmail.com>, Lauren Matsumoto <laurenkmatsumoto@gmail.com>, Pierick <elijah.pierick.publicservant@gmail.com>, epmuraoka@capitol.hawaii.gov, Jesse Franklin-Murdock (Dhillon Law) <JFM@dhillonlaw.com>, Sheila Medeiros sheilamedeiros411@gmail.com>, Boyd Ready <readyboyd@gmail.com>, MELLE S Aguinaldo <melle.lotwm@gmail.com>

My intent was not shame or embarrass you, it was merely a response to your tantrum and threatening the party to let social media outlets and the news become aware of your victimhood. I mean seriously let's expose it all right?

[Quoted text hidden]

D-EXHIBIT D

Email excerpt to Plaintiff, Christina Everett from Defendant, Tamara McKay.

On Wed, May 21, 2025 at 7:59 AM Hawaii Republican Party <hrpchair@gophawaii.com> wrote

Aloha Ms. Everett,

Thank you for your letter in which you submitted a formal complaint regarding the conduct of Mr. Enoka-Shayne Bingo, the current District Chair for House District 35. Your concerns regarding coordination, communication, and delegate selection have been duly noted.

I must clarify that the Hawaii Republican Party Bylaws do not assign a specific duty to a District Chair for the direct appointment of delegates. Section 206 of the Bylaws specifies that appointments to delegate positions in the case of vacancies are the responsibility of precinct chairs, or in the absence of such, the district or county chairs in that order. Additionally, there is no requirement in the Bylaws that obligates a District Chair to provide personal coordination with declared candidates.

As such, your concerns, while understood, do not at this time constitute a bylaw violation or grounds for removal under Section 316, which requires demonstrated cause or neglect, including malfeasance, misfeasance, or nonfeasance. Based on the information presented, no such threshold has been met.

It is also important to note that issues concerning district leadership fall under the jurisdiction of the respective County Committee. Therefore, any further review or actions regarding the performance or status of a District Chair must be directed to the County Chair, Nolan Chang, who serves as the supervising authority for district matters under Section 325(E) of the Bylaws.

Lastly, I must respectfully express concern regarding your stated intent to escalate this matter publicly. While transparency is a valued principle, presenting unsubstantiated claims in a public forum could undermine party unity and create legal concerns. Accordingly, I am referring this matter to our legal counsel at the Dhillon Law Group for review and any necessary advice.

Please direct any future communication on this issue to the County Chair, who will evaluate the matter in accordance with Party rules and processes.

Tamara McKay

State Chair, Hawaii Republican Party

(808)280-0928

EXHIBIT F

Email excerpt from Plaintiff, Christina Everett to Defendant, Tamara McKay. Plaintiff self-identifies as a declared candidate.

On Wed, May 21, 2025 at 7:40 AM Christina Everett <ceverett56@gmail.com> wrote

Dear Chair McKay,

I am writing to submit a formal complaint regarding the conduct and performance of Mr. Enoka-Shayne Bingo, who currently serves as the District Chair for House District 35.

As a declared candidate for State Representative, I have made repeated efforts to contact Mr. Bingo to engage in essential coordination regarding delegate access, precinct development, and Republican visibility in our community. Mr. Bingo has failed to return phone calls, emails, or provide any meaningful communication. His absence has left District 35 without party leadership or direction during a critical election cycle.

Moreover, his failure to properly inform members about the delegate selection process ahead of the May 14th deadline is a serious violation of his duties. This lack of transparency has resulted in my disenfranchisement, as well as that of others who attempted to participate in good faith.

I respectfully request the following:

1. A formal review of Mr. Bingo's performance and conduct.
2. Consideration of removal proceedings per the HRP Bylaws.
3. Appointment of a proactive interim or permanent chair.
4. A written interpretation of the HRP bylaws concerning the responsibilities of district chairs, the delegate selection process, and the procedure for removal.

Image from Hawaii Spending Campaign Commission website showing the date Plaintiff filed as a candidate.

ORGANIZATIONAL REPORT FILINGS

← Back

Candidate Name	Filing Date	Amendment
Everett, Christina	05/22/2025	No
Everett, Christina	05/22/2025	Yes

F - EXHIBIT F

Plaintiff's email to Defendant McKay, falsely claiming her official candidacy. (See lines 23-29.)

On Wed, May 21, 2025 at 7:40 AM Christina Everett <ceverett56@gmail.com> wrote

Dear Chair McKay,

I am writing to submit a formal complaint regarding the conduct and performance of Mr. Enoka-Shayne Bingo, who currently serves as the District Chair for House District 35.

As a declared candidate for State Representative, I have made repeated efforts to contact Mr. Bingo to engage in essential coordination regarding delegate access, precinct development, and Republican visibility in our community. Mr. Bingo has failed to return phone calls, emails, or provide any meaningful communication. His absence has left District 35 without party leadership or direction during a critical election cycle.

Moreover, his failure to properly inform members about the delegate selection process ahead of the May 14th deadline is a serious violation of his duties. This lack of transparency has resulted in my disenfranchisement, as well as that of others who attempted to participate in good faith.

I respectfully request the following:

1. A formal review of Mr. Bingo's performance and conduct.
2. Consideration of removal proceedings per the HRP Bylaws.
3. Appointment of a proactive interim or permanent chair.
4. A written interpretation of the HRP bylaws concerning the responsibilities of district chairs, the delegate selection process, and the procedure for removal.

Should the Party fail to act, I will be forced to take this issue to the public. Voters deserve to know when dysfunction within their own party structure obstructs progress and silences new leadership.

To that end, I am attaching the following materials:

- A Public Statement for immediate release to clarify my position to the voters and media.
- A Press Release detailing the nature of this complaint and calling for reform.

I remain committed to building a strong, transparent Republican presence in District 35 and across Hawai'i. I urge the Party to take swift corrective action.

* "Attached is a formal letter for your convenience, which outlines the nature of my complaint and requested actions."

Sincerely,

Christina Everett

Christina Everett (accepted as my signature)

Candidate for Hawai'i State Representative, District 35

Public Statement

As a candidate for State House District 35, I have a duty to inform the public when internal dysfunction threatens the integrity of our electoral process. Despite multiple attempts to coordinate with our current District Chair, Mr. Enoka-Shayne Bingo, there has been no response or guidance provided—leaving our district and its Republican members without a voice.

EXHIBIT(S) H1 to H3

Attached as EXHIBIT(S) H1 to H3 are the copies of the Return
and Acknowledgement of Service for Defendants Tamara McKay, Sheryl Bieler and Enoka-
Shayne Bingo. No summons recorded.

[SEE ATTACHED COPIES.]

H - EXHIBIT H.1; H.2; H.3

STATE OF HAWAII CIRCUIT COURT OF THE _____ CIRCUIT	RETURN AND ACKNOWLEDGMENT OF SERVICE	
CASE NUMBER ICCV NO. 250000852		
CASE NAME CHRISTINA EVERETT, PLAINTIFF VS. Hawaii Republican Party, Tamara McKah, Nolan Chang, Sheryl Bieler, Enoka Shayne Bingso, And Teri Savaii Naea		
DOCUMENTS SERVED: ICCV NO. 250000852 AND FORMAL GRIEVANCE		
I, Sheriff/Police Officer of the State of Hawai'i do hereby certify that I received a certified copy of the documents listed above and that I served the same on _____		
on _____ (date)	at _____ (time)	(name of party) _____ at _____ (address)
within the State of Hawai'i as follows:		
<input type="checkbox"/> PERSONAL: By delivering to and leaving with _____ personally.		
<input type="checkbox"/> SUBSTITUTE: [HRCP 4(d) (1) (A)] After due and diligent search and inquiry, I served above-named defendant through _____, a person of suitable age and discretion then residing at said party's usual place of abode, since the defendant could not be found.		
<input type="checkbox"/> SUBSTITUTE: [HRCP 4(d) (1) (B)] I served above-named defendant through _____ authorized agent to receive service of process for said defendant.		
<input checked="" type="checkbox"/> BUSINESS/CORPORATION/GOVERNMENTAL ENTITY: On _____ _____ by serving through _____ (name of business/corp/entity) _____, who is the _____ (name of person served) of said Business/Corporation/Governmental Entity. (position/title) and authorized agent		
<input type="checkbox"/> GARNISHMENT: I served _____ through _____ _____ (name of garnishee) _____ (name of person served) who is authorized to accept service for the above-named garnishee.		
<input type="checkbox"/> NOT FOUND: After due and diligent search and inquiry, I am unable to find _____ (name of party)		

STATE OF HAWAII
CIRCUIT COURT OF THE
CIRCUIT

RETURN AND ACKNOWLEDGMENT OF SERVICE
(Page 2)

CASE NUMBER

CASE NAME

Attorney (Name, I.D. No., Address, Phone)

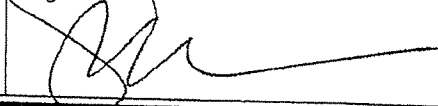
Date:

Sheriff/Police Officer (type or print)

Signature

5/27/25

SHERA MERRAS



SUBSCRIBED AND SWORN

TO BEFORE ME THIS DATE:

May 27, 2025
City & County
IN Honolulu, HAWAII

NOTARY PUBLIC'S SIGNATURE:


STATE OF HAWAII

MY COMMISSION EXPIRES:

10-08-2025

ACKNOWLEDGMENT OF SERVICE

Individual Refused to Sign
(signature of person served)

(date)

(time)

TAMARA MERRAS

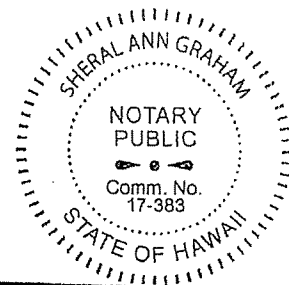
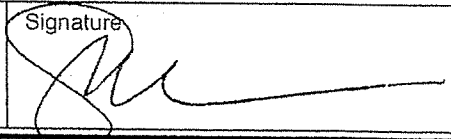
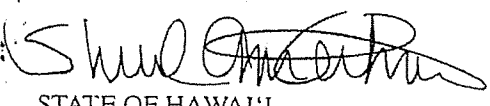
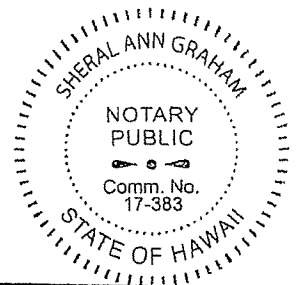


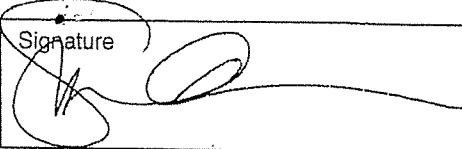

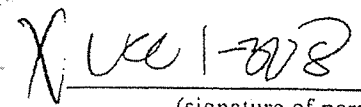
EXHIBIT H.2

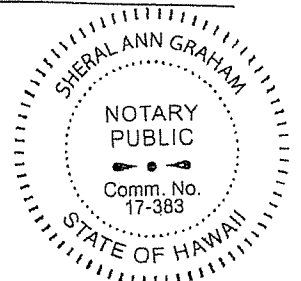
STATE OF HAWAII CIRCUIT COURT OF THE <u>First</u> CIRCUIT	RETURN AND ACKNOWLEDGMENT OF SERVICE	
<p>CASE NUMBER <u>1CCV</u> <u>NO. 250000852</u></p>		
<p>CASE NAME <u>Christina Everett, Plaintiff</u> <u>VS</u> <u>HAWAII Republican party, Tamara McKay, Ndon</u> <u>Cheng, Sheryl Bielek, Erika-Shayne Singo.</u> <u>and Teri Savaiianea</u></p>		
<p>DOCUMENTS SERVED: <u>1CCV NO. 250000852 AND FORMAL</u> <u>COMPLAINT</u></p>		
<p>I, Sheriff/Police Officer of the State of Hawai'i do hereby certify that I received a certified copy of the documents listed above and that I served the same on _____ on _____ at _____ (name of party) (date) (time) at _____ _____ within the State of Hawai'i as follows: (address)</p>		
<p><input type="checkbox"/> PERSONAL: By delivering to and leaving with _____, personally.</p>		
<p><input type="checkbox"/> SUBSTITUTE: [HRCF 4(d) (1) (A)] After due and diligent search and inquiry, I served above-named defendant through _____, a person of suitable age and discretion then residing at said party's usual place of abode, since the defendant could not be found.</p>		
<p><input type="checkbox"/> SUBSTITUTE: [HRCF 4(d) (1) (B)] I served above-named defendant through _____, authorized agent to receive service of process for said defendant.</p>		
<p><input type="checkbox"/> BUSINESS/CORPORATION/GOVERNMENTAL ENTITY: On _____ (name of business/corp/entity) _____ by serving through _____ (name of person served) _____, who is the _____ and authorized agent (position/title) of said Business/Corporation/Governmental Entity.</p>		
<p><input type="checkbox"/> GARNISHMENT: I served _____ through _____ (name of garnishee) _____ who is authorized to accept service for the above-named garnishee. (name of person served)</p>		
<p><input type="checkbox"/> NOT FOUND: After due and diligent search and inquiry, I am unable to find _____ (name of party)</p>		

STATE OF HAWAII CIRCUIT COURT OF THE _____ CIRCUIT	RETURN AND ACKNOWLEDGMENT OF SERVICE (Page 2)	
CASE NUMBER		
CASE NAME		
Attorney (Name, I.D. No., Address, Phone)		
Date:	Sheriff/Police Officer (type or print)	Signature
5/27/25	SHERA MONAROS	
SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE: <u>May 27, 2025</u> County of <u>Honolulu</u> IN <u>Honolulu</u> , HAWAII	NOTARY PUBLIC'S SIGNATURE:  STATE OF HAWAII	MY COMMISSION EXPIRES: <u>10-08-2025</u>
<div style="text-align: center;"> ACKNOWLEDGMENT OF SERVICE </div> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 10px;"> <div style="width: 45%;"> <p style="font-size: 1.5em; margin: 0;">X Individual refused to sign</p> <p style="margin: 0;">(signature of person served)</p> <p style="margin: 0;"><u>SHERYL BIELEN</u></p> </div> <div style="width: 45%;"> <p style="margin: 0;">(date)</p> <p style="margin: 0;">(time)</p> </div> </div>		

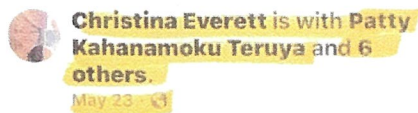


STATE OF HAWAII CIRCUIT COURT OF THE <u>First</u> CIRCUIT	RETURN AND ACKNOWLEDGMENT OF SERVICE	
CASE NUMBER <u>1 CCV NO. 250000852</u>		
CASE NAME <u>Christina Everett, Plaintiff</u> <u>vs.</u> <u>Hawaii Republican Party, Tamara McKay,</u> <u>Nolan Chang, Sherry Pielex, ENOKA-Shayne Bing,</u> <u>and Teri Savaiinaea</u>		
DOCUMENTS SERVED: <u>1 CCV NO. 250000852 Complaint,</u> <u>Formal Grievance</u>		
I, Sheriff/Police Officer of the State of Hawai'i do hereby certify that I received a certified copy of the documents listed above and that I served the same on _____ on _____ at _____ (name of party) (date) (time) at _____ (address) within the State of Hawai'i as follows:		
<input type="checkbox"/> PERSONAL: By delivering to and leaving with _____, personally.		
<input type="checkbox"/> SUBSTITUTE: [HRCF 4(d) (1) (A)] After due and diligent search and inquiry, I served above-named defendant through _____, a person of suitable age and discretion then residing at said party's usual place of abode, since the defendant could not be found.		
<input type="checkbox"/> SUBSTITUTE: [HRCF 4(d) (1) (B)] I served above-named defendant through _____, authorized agent to receive service of process for said defendant.		
<input type="checkbox"/> BUSINESS/CORPORATION/GOVERNMENTAL ENTITY: On _____ (name of business/corp/entity) _____ by serving through _____ (name of person served) _____, who is the _____ and authorized agent (position/title) of said Business/Corporation/Governmental Entity.		
<input type="checkbox"/> GARNISHMENT: I served _____ through _____ (name of garnishee) _____ who is authorized to accept service for the above-named garnishee. (name of person served)		
<input checked="" type="checkbox"/> NOT FOUND: After due and diligent search and inquiry, I am unable to find _____ (name of party)		

STATE OF HAWAII CIRCUIT COURT OF THE CIRCUIT		RETURN AND ACKNOWLEDGMENT OF SERVICE (Page 2)	
CASE NUMBER			
CASE NAME			
Attorney (Name, I.D. No., Address, Phone)			
Date	Sheriff/Police Officer (type or print)	Signature	
5/27/25	SHELLA MEYEROS		
SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE: May 27, 2025 City & County IN Honolulu, HAWAII		NOTARY PUBLIC'S SIGNATURE:  STATE OF HAWAII	MY COMMISSION EXPIRES: 10-08-2025
<p style="text-align: center;"><u>ACKNOWLEDGMENT OF SERVICE</u></p> <p>X  _____ (signature of person served) (date) (time)</p> <p>_____</p> <p>_____</p>			



Defamatory social media posts made by the Plaintiff about the Defendants. Shared with 96+ individuals in the public arena.



ENOUGH IS ENOUGH.

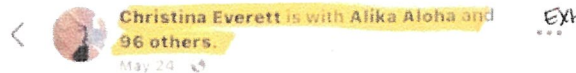
I'M SPEAKING OUT AGAINST THE HARASSMENT AND MISCONDUCT I'VE EXPERIENCED WITHIN THE REPUBLICAN PARTY OF HAWAII—FROM INDIVIDUALS LIKE NOLAN CHAN, TAMARA MCKAY, SHERYL BIELER, TERI SAVAIINAEA AND ENOKA-SHAYNE BINGO

Their actions have crossed a line—and I will not be silent. This isn't just about me. It's about protecting others from toxic leadership and restoring integrity in our political process. I'm documenting everything and taking legal steps to hold people accountable.

TO THE PEOPLE OF HAWAII:
I STAND FOR TRUTH.
I STAND FOR JUSTICE.
I STAND FOR YOU.



Christina Everett



Aloha to YOU... ❤️

I want to take a moment to speak from my heart — not as a candidate, not even as a plaintiff, not as a Pastor, but simply as a sister in Christ walking through one of the most refining 11 days of this season of my life.. 🙏

This process — pursuing justice within the very Party (Republican) I believed in — has taken a toll on me emotionally, spiritually, and even physically. It's not easy to stand when you're being slandered, misrepresented, and opposed. 🙏 And yet, I feel a glimpse of the same rejection and persecution that comes with following Jesus. When you stand for truth, even in love, you become a threat to systems built on pride and self-protection. 🙏

I want to thank each of you — not because you are my friend, but because you stand for righteous principles. I don't expect blind loyalty. In fact, if I were ever in the wrong, I would expect you to correct me — to rebuke me, even to slap me in love, and you do, Sheila Medeiros, Pastor Melle, Mikala, my husband, Nelson, Children, Sonya, all YOU Pastors, and especially my Pastor Eddie 🙏 — because hell is hotter than here, and eternal accountability is far more serious than political consequence. I've been saved more than I deserved and serve Satan 🙏 when I was running a mock 🙏 Because of HIS grace, here I am...

This ordeal has tested my character more than anything I've ever experienced. I would rather stand with God and be judged by the world than to stand with the world and be judged by God.

Every slanderous word spoken against me... every jealous action I've seen unfold... it all reveals how deeply broken our world is. And how desperately people need Jesus — not just in theory, but in transformation.

So I keep standing. Not because I want a seat of power, but because I want to honor the One who gave me a voice to speak. And if this is the cross I must carry for now, I carry it with the assurance that the Lord walks beside me.

EXHIBIT K

Legal authorities and case law.

(SEE THE FOLLOWING DOCUMENTS)

K - EXHIBIT K

EXHIBIT: LEGAL AUTHORITIES AND CASE LAW

This Exhibit is submitted in support of the Defendants' Motion to Dismiss, and provides legal authority confirming the longstanding principle that courts do not interfere with internal political party governance unless civil rights or public policy are violated.

POLITICAL PARTIES AS PRIVATE ASSOCIATIONS

- Democratic Party of U.S. v. Wisconsin ex rel. La Follette, 450 U.S. 107 (1981)

"A political party's determination of the structure which is necessary to its effective internal governance must be given substantial deference by the courts."

Holding: The Supreme Court emphasized that a political party has a First Amendment right to freedom of association, including control over internal affairs, delegate selection, and candidate endorsement processes.

- Ray v. Blair, 343 U.S. 214 (1952)

Holding: State laws cannot dictate to a political party how to select its representatives or force a party to accept members or delegates that the party has lawfully excluded under its internal rules.

- O'Brien v. Brown, 409 U.S. 1 (1972)

Holding: The U.S. Supreme Court declined to intervene in a dispute over the seating of delegates at the Democratic National Convention, ruling that internal political party decisions are non-justiciable political questions absent a clear constitutional violation. The Court emphasized that political parties are private associations with autonomy to manage their internal affairs, such as delegate selection and disciplinary actions, unless they violate protected constitutional rights (e.g., voting rights under the Fifteenth Amendment).

I. STATE LAW: HAWAII REVISED STATUTES (HRS)

HRS §11-62 – Requires political parties to adopt and file their own rules and bylaws, and recognizes them as binding on internal procedures.

“The rules of a party shall be adopted at the time the party qualifies and shall govern party operations unless changed by the party.”

HRS §11-63 – Enforces that the party’s own rules govern membership and delegate qualifications, provided they are on file with the Office of Elections.

II. PRINCIPLE: COURTS WILL NOT ACT AS “SUPER-ELECTION COMMITTEES”

- Osei v. Republican Party of Arkansas, 2022 WL 801426 (E.D. Ark. Mar. 16, 2022)

Holding: A federal court declined to interfere in a dispute over delegate selection and candidate endorsement, affirming the autonomy of party processes absent a clear civil rights violation.

- Lee v. Democratic Party of Hawaii, Civ. No. 17-00155 DKW-KSC (D. Haw. 2017)

Holding: Dismissed plaintiff’s claim due to lack of standing and failure to state a legal injury, where dispute was based solely on party procedures and not on deprivation of a public right or constitutional violation.

APPLICATION TO THIS CASE

The Plaintiff, Ms. Everett, challenges her non-selection as a delegate to the Republican State Convention, and demands action despite:

- a) Failure to exhaust internal grievance procedures under HRP Bylaws.
- b) No violation of any constitutionally protected right.
- c) No denial of public accommodation, voting rights, or candidacy access.
- d) Therefore, under controlling precedent and state law, this matter is not properly before the court and must be dismissed.

CERTIFICATE OF SERVICE

I, Enoka-Shayne Bingo, certify that on this ~~3rd~~ day of July, 2025, at 4:00 AM/PM HST, I served true and correct copies of all documents filed by Defendants Tamara McKay, Sheryl Bieler and Enoka-Shayne Bingo, which included, Notice of Hearing; Defendants' Motion To Dismiss; Memorandum in Opposition to Motion for Default Judgement; Memorandum in Support of Defendants' Motion to Dismiss and Request of Joinder upon the following parties by electronic mail pursuant to HRCF Rule 5(b)(2)(C) and HRCF Rule 5(b)(2), as the served parties have initiated service upon named Defendants prior to this certification.

Total documents served: 5

1. Defendants' Motion to Dismiss for Insufficiency of Process and Failure to State a Cause
2. Notice of Hearing
3. Memorandum in Opposition to Motion for Default Judgement
4. Request of Joinder
5. Memorandum in Support of Defendants' Motion to Dismiss

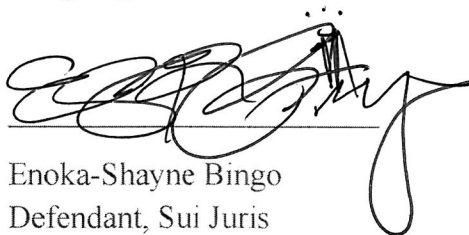
Name of Party Served: **Christina Everett**, Plaintiff, Pro Se

Email Address: ceverett56@gmail

Name of Party Served: **Jesse Franklin Murdock**, Counsel for Teri Savaiinaea and Nolan Chang

Email Address: JFM@dhillonlaw.com (Jesse Franklin Murdock)

The email was sent from shaynebingo@gmail.com, with successful transmission and no error notification. Documents were attached in PDF format with the subject line: Service- Case No. 1CCV-25-0000852." I declare under penalty of perjury under HRS § 710-1060 that the foregoing is true and correct to the best of my knowledge.



1/7/25

Enoka-Shayne Bingo

Defendant, Sui Juris

PO Box 1084

Kailua, Hi, 96734

Shaynebingo@gmail.com

(808)393-0810