



HAWAII REPUBLICAN PARTY

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August 8, 2025

CIRCUIT COURT OF THE FIRST CIRCUIT, STATE OF HAWAII
Ka'ahumanu Hale
777 Punchbowl Street
Honolulu, HI 96813-5093

RE: CASE #1CCV-25-0000852
CHRISTINA EVERETT (Plaintiff) vs. HAWAII REPUBLICAN PARTY,
TAMARA McKAY, NOLAN CHANG, SHERYL BIELER, ENOKA-SHAYNE BINGO,
and TERI SAVAIINAEA (Defendants)

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FIRST CIRCUIT COURT
STATE OF HAWAII
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RESPONSE TO COMPLAINT FOR DEFENDANT, HAWAII REPUBLICAN PARTY

The Honorable Presiding Judge:

The newly elected officers of the Hawaii Republican Party have read through the allegations and extensive exhibits filed by the Plaintiff in this case, and empathize with the Plaintiff, Christina Everett. For context, the newly elected officers — eight in total — represent a complete replacement of the previous top Party positions formerly led by co-defendant Tamara McKay, and included co-defendants Sheryl Bieler and Teri Savaiinaea. The election and transference of authority took place on May 25, 2025, after the succession of allegations set forth by the Plaintiff in this complaint occurred.

The body of officers who represent the Hawaii Republican Party presently are appalled at the unprofessional, abusive and dismissive interactions by the former Party officers; however, we assert both their actions and conduct are not supported by HRP bylaws and, as such, were performed in their individual capacity as private citizens, outside of the color of their authority as Party officers. In that vein, the Hawaii Republican Party contends that the HRP as an organizational entity was in no way participatory in the alleged acts of defamation, tortious interference and civil conspiracy alleged in this complaint.

The Plaintiff's own exhibits seem to echo and support this contention.

In Exhibit A ("Formal grievance to HRP leadership on May 23, 2025"), the Plaintiff very specifically isolates her grievance against the following "individuals," referencing the five individually-named co-defendants by name. In three itemized allegations — Defamation & Character Assassination, Neglect of Duty and Political Retaliation, and Failure of Leadership Response — the Plaintiff lodges very specific complaints of violations of

HRP bylaws and Party ethics; however, at no point does she allege that these individual actions represent a pervasive, systemic problem throughout the HRP, nor does she blame the HRP as an organization for these individual acts.

In Plaintiff's Exhibit C, Insert 4b, we ask that the Court take judicial note of HRP National Committeewoman Laura Nakanelua's attempt to utilize her connection to the Republican National Committee to seek guidance on behalf of the Plaintiff on how to address what felt like conspiratorial gridlock at the highest level of our local party leadership at the time. In that text exchange, the Plaintiff extends her appreciation for the National Committeewoman's "persistence in holding leadership accountable," with Mrs. Nakanelua categorizing the Plaintiff's struggle with said leadership as "not acceptable." The HRP contends that this demonstrates that the alleged actions set forth by the Plaintiff in this complaint are not representative of the Hawaii Republican Party as a whole, nor does it condone them.

In Exhibited A, Insert 7, a Supplemental Declaration of Christina Everett, the Plaintiff declares that "The tone and content of the media inquiry show that my past was deliberately re-circulated and weaponized by certain members of the Hawaii GOP leadership in order to damage my public image and candidacy." Once again, we call the Court's attention to the Plaintiff's own sworn statement that her past was weaponized by "certain members of the Hawaii GOP leadership," and not by the Hawaii GOP, a synonym for the Hawaii Republican Party.

Perhaps the most egregious of the Plaintiff's allegations is captured in Exhibit A, Insert 12 ("Email thread from Sheryl Bieler regarding defamation and misconduct — May 22, 2025"), wherein co-defendant Bieler writes that she is "sure the news and Social Media would love to get their hands on" a 2010 news article on the Plaintiff's prior conviction, which was copied onto the email. Later in the email thread, the Plaintiff asks, "who is responsible for monitoring this behavior? Who is holding people like Sheryl accountable?"

The answer to the Plaintiff's question is, under the HRP's organizational structure, co-defendant and former State Chair McKay was the immediate supervisor of co-defendant Bieler, who held the position of Vice Chair for Coalitions at the time. This conspiratorial gridlock among a tight circle of the HRP's top leaders at the time kept a close hold on the challenges the Plaintiff was experiencing and insulating it from the general oversight of the Party's governing State Committee, which could only convene subject to the call of co-defendant McKay.

Finally, the HRP wishes to highlight Exhibit A, Insert 14 ("Text Message from Gary Cordery and supplemental declaration — May 25, 2025"). In this Supplemental Declaration of Christina Everett, the Plaintiff swears to the following:

"4. Mr. Cordery acknowledges and validates a central claim in my lawsuit: the failure of certain individuals within the HRP to carry out their official responsibilities in processing and responding to my delegate request. He explicitly states there was 'a lack of support and seemingly unwillingness for those who did not do their job.'

5. Although Mr. Cordery questions the inclusion of the HRP as a named defendant, his message further acknowledges that 'the entire org is going to oppose your case,' thereby confirming that the HRP as a whole has taken an adversarial position. This directly supports the argument that the HRP has institutionally aligned itself against my complaint, regardless of whether the misconduct was initially limited to specific individuals.

6. The acknowledgement that 'the entire org is going to oppose your case' demonstrates the likelihood of organizational retaliation or obstruction, further complicating my access to due process and amplifying the power imbalance between myself and the HRP. This supports my legal claim of systemic misconduct or willful neglect."

We address these sworn declarations separately:

First, the Plaintiff attests that Mr. Cordery validates a "central claim of the Plaintiff's lawsuit: the failure of certain individuals within the HRP"; not the failure of the HRP.

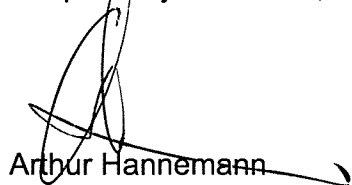
Second, the Plaintiff attests that Mr. Cordery questions the inclusion of the HRP as a named defendant, and further declares that Mr. Cordery's message acknowledges that "the entire org is going to oppose your case." To the contrary, the Hawaii Republican Party does not adopt an adversarial posture and is not institutionally aligned against the Plaintiff's complaint; however, we do vehemently contend that the alleged misconduct is confined to the specific individually-named co-defendants, whose actions were conducted outside of the color of their authority as elected officers, were not authorized and are not condoned by the Hawaii Republican Party, and were sequestered from the knowledge and general oversight of the Party's State Committee, which exercises general oversight of the Party's affairs. For these reasons, the Hawaii Republican Party actually supports the Plaintiff's claim against the individually-named co-defendants, while strongly disagreeing that the HRP as an organizational entity was participatory or complicit, and therefore should not be included as a co-defendant.

Lastly, Plaintiff declares that she believes there exists a “likelihood of organizational retaliation or obstruction,” that would “further complicating (her) access to due process and amplifying the power imbalance between (herself) and the HRP.” In reality, the new HRP leadership has moved quickly to establish a new Discipline Committee, whose charge it will be to address matters just like this case, beginning with the formal complaint filed internally by the Plaintiff on May 23, 2025. Contrary to the Plaintiff’s sworn declaration, the actions taken by the HRP’s new leadership very intentionally create a pathway for the due process that was denied the Plaintiff back in late May and, as such, absolutely does not support the Plaintiff’s legal claim of systemic misconduct or willful neglect by the Hawaii Republican Party as an entity.

In the interest of the Court’s time, we’ll confine our response to the specific examples cited, taken directly from the Plaintiff’s own exhibits, though there are several others that serve to illustrate that the alleged injurious actions were not, and are not, a systemic reflection of the Hawaii Republican Party as a whole, but rather the unsanctioned acts of rogue former leaders committed in their individual capacity outside of any authority granted them as party officers.

The Hawaii Republican Party thanks the Court for the opportunity to submit its response, and at this time serves judicial notice of its intent to file a Motion to Dismiss our organization, singularly, from the complaints set forth against it in Case #1CCV-25-0000852.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Arthur Hannemann', written over a horizontal line.

Arthur Hannemann
State Chair, Hawaii Republican Party

cc: Christina Everett
Leslie Jones, State Secretary
Boyd Ready, State Rules Committee Chair