

FILED

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MAUREEN G. KELLY  
LAKE CO. CLERK OF COURT

**IN THE COURT OF COMMON PLEAS  
CIVIL DIVISION  
LAKE COUNTY, OHIO**

**KIMBERLY LAURIE**  
38314 Beachview Road  
Willoughby, OH 44094

PLAINTIFF

vs.

**JANET CLAIR**  
763 Mentor Avenue, Apt. 6  
Painesville, OH 44077

and

**DALE FELLOWS**  
2812 Fowler Drive  
Willoughby Hills, OH 44094

and

**AMY SABATH**  
7085 Village Drive  
Concord, OH 44060

and

**16CV000472**  
**EUGENE A. LUCCI**

**PLAINTIFF'S COMPLAINT  
FOR DAMAGES**  
(with Jury Demand)

**JASON WULIGER** )  
8980 Red Tail Lane )  
Kirtland, OH 44094 )

and )  
)

**SUE BETTELEY** )  
352 Courtland Street )  
Painesville, OH 44077 )  
and )

**DAVID VITAZ** )  
8075 North Orchard Road )  
Concord, OH 44077 )

and )  
)

**JOHN and/or JANE DOE #1** )  
**AUTHOR OF EMAIL DATED** )  
**FEBRUARY 23, 2015 AT 12:01 AM** )  
**PURPORTEDLY FROM EMAIL** )  
**ADDRESS KIMLAURIE@1791.COM** )  
(whose actual name is unknown and )  
whose name and address the Plaintiff )  
could not discover) )

and )  
)

**JOHN and/or JANE DOE #2** )  
**AUTHOR OF EMAIL DATED** )  
**FEBRUARY 17, 2015 AT 11:51 PM** )  
**PURPORTEDLY FROM EMAIL** )  
**ADDRESS KIMLAURIE@1791.COM** )  
(Whose actual name is unknown and )  
whose name and address the Plaintiff )  
could not discover) )

DEFENDANTS )

Now comes the Plaintiff, KIMBERLY LAURIE, by and through undersigned counsel, and for her within Complaint alleges as follows:

**PARTIES AND JURISDICTION**

1. Plaintiff KIMBERLY LAURIE (“Plaintiff”) is an individual residing at 38314 Beachview Road, City of Willoughby, County of Lake, State of Ohio 44094.
2. Defendant Janet Clair (“Defendant Clair”) is an individual residing at 763 Mentor Avenue, Apt. 6, City of Painesville, County of Lake, State of Ohio 44077.
3. Defendant Dale Fellows (“Defendant Fellows”) is an individual residing at 2812 Fowler Drive, City of Willoughby Hills, County of Lake, State of Ohio 44094.
4. Defendant Amy Sabath (“Defendant Sabath”) is an individual residing at 7085 Village Drive, Township of Concord, County of Lake, State of Ohio 44060.
5. Defendant Sue Betteley (“Defendant Betteley”) is an individual residing at 352 Courtland Street, City of Painesville, County of Lake, State of Ohio 44077.
6. Defendant Jason Wuliger (“Defendant Wuliger”) is an individual residing at 8980 Red Tail Lane, City of Kirtland, County of Lake, State of Ohio 44094.
7. Defendant David Vitaz (“Defendant Vitaz”) is an individual residing at 8075 North Orchard Road, Township of Concord, County of Lake, State of Ohio 44077.
8. At all times relevant herein, Plaintiff was a precinct committeewoman for the Lake County Republican Party and, by virtue of that post, participated in directing and/or conducting Lake County Republican Party affairs.
9. At all times relevant herein, Defendant Fellows was the Chairman of the Lake County Republican party and a member of the Lake County Republican Party Executive Committee.

10. At all times relevant herein, Defendant Clair was the Chairwoman of the Lake County Republican Party and a member of the Lake County Republican Party Executive Committee.
11. At all times relevant herein, Defendant Sabath was the First Vice Chair of the Lake County Republican Party and a member of the Lake County Republican Party Executive Committee.
12. On June 9, 2014, Defendant Wuliger became the Second Vice Chair of the Lake County Republican Party and a member of the Lake County Republican Party Executive Committee and held said office until the present day.
13. At all times relevant herein, Defendant Betteley was the Secretary of the Lake County Republican Party and a member of the Lake County Republican Party Executive Committee.
14. At all times relevant herein, Defendant Vitaz was the Treasurer of the Lake County Republican Party and a member of the Lake County Republican Party Executive Committee. (Defendants Fellows, Clair, Sabath, Betteley, and Vitaz shall be referred to collectively as "Defendants Executive Committee.")
15. At all times relevant herein, Defendants John and/or Jane Doe #1 are the unknown author(s) of an email constructed in such a manner that it appeared to have been sent by Plaintiff, though it was not, and copies of which were distributed by Defendant Clair to those in attendance at a public meeting of the Lake County Republican Party Central Committee meeting conducted on Monday, August 31, 2015.
16. At all times relevant herein, Defendants John and/or Jane Doe #2 are the unknown author(s) of an email constructed in such a manner that it appeared to have been sent by Plaintiff, though it was not, and copies of which were distributed by Defendant Clair to those in attendance at a public meeting of the Lake County Republican Party Central Committee conducted on Monday, August 31, 2015. . (John and/or Jane Doe #1 and John and/or Jane Doe #2 shall hereinafter be referred to collectively as "Doe Defendants")

17. The Doe Defendants are an unknown number of individuals who concocted, either separately or together, emails that purported to have been written and sent by Plaintiff, but were not. The Doe Defendants' names are unknown to Plaintiff at the present time, but Plaintiff will amend her Complaint by substituting their true names and addresses when discovered.

18. Jurisdiction and venue are proper, as Plaintiff and all Defendants with the possible exception of the Doe Defendants reside in Lake County, Ohio, and the events at issue here were caused by Defendants' actions and/or failures to act in Lake County, Ohio.

### **FACTS AND BACKGROUND INFORMATION**

19. Plaintiff reavers all prior statements, averments and allegations set forth in Plaintiff's Complaint as though fully rewritten herein.

20. At all times relevant to the within Complaint, Defendants Executive Committee had the power to and did schedule regular monthly meetings of the Lake County Republican Party Central Committee and had the power to and did create the agenda for each Central Committee meeting.

21. On or about May 6, 2014, Plaintiff won the contested Republican nomination for that year's race for a position on the Lake County Board of Commissioners.

22. On or about July 28, 2014, the Lake County Republican Party conducted its first meeting devoted to determining candidate endorsements by the Lake County Republican Party for the upcoming 2014 fall elections.

23. At the July, 2014 meeting, the question of Plaintiff's endorsement was tabled as Plaintiff was unwilling to endorse the candidacy of Congressman David Joyce.

24. On or about August 25, 2014, a second session regarding party endorsements was conducted at a Central Committee meeting and again Plaintiff was pressured to endorse Congressman David Joyce. Ultimately, the Party endorsement was voted for Plaintiff

despite the fact that she continued to refuse to endorse Congressman Joyce, but instead agreed not to oppose Congressman Joyce.

25. On or about November 4, 2014, Plaintiff was defeated in her race for Lake County Commissioner by Democrat Dan Troy, the incumbent, by 1.7% of the ballots case, or approximately one thousand two hundred (1,200) out of seventy thousand (70,000) votes.

26. On or about March 30, 2015, Plaintiff announced to the Lake County Republican Executive Committee that she intended once again to seek the office of county commissioner in 2016.

### **COUNT ONE: IDENTITY FRAUD I**

(As to Defendants John and/or Jane Doe #1)

27. Plaintiff reavers all prior statements, averments and allegations set forth in Plaintiff's Complaint as though fully rewritten herein.

28. At some time prior to August 31, 2015, Defendants John and/or Jane Doe #1 came into possession of Plaintiff's identifying information, i.e., Plaintiff's electronic mail address, with the intent to use Plaintiff's electronic mail address to hold himself or herself out as Plaintiff by composing and sending an email purported to be from Plaintiff's electronic mail address even though it was not.

29. On or about before August 31, 2015, Defendants John and/or Jane Doe #1 created an electronic mail message using Plaintiff's identifying information and causing said electronic message to appear to have been created by Plaintiff, though it was not (Copy attached hereto as Exhibit 1).

30. Said electronic message was dated Thursday, February 17, 2015 at 11:51 pm with the subject line "Rino's."

31. Said electronic message contained the sentence, attributed to Plaintiff: "We were successful in fighting back a Rino candidate, George Phillips in 2014," a statement that Plaintiff has never made, with which Plaintiff does not agree, and that would be offensive to many Lake County Republican Party members.

32. Furthermore, said electronic message contained the sentence, attributed to Plaintiff: "We weren't successful in ousting Kasich and Joyce but we continue to work," a

statement that Plaintiff has never made, with which Plaintiff does not agree, and that would be offensive to many Lake County Republican Party members.

33. Additionally, said electronic message contained the sentences, attributed to Plaintiff: “We have to replace the Rino’s who’re running in 2015 with quality candidates. This includes finding a replacement for Kristen Peters, as she’s been getting cozy with our Rino enemies,” which is a statement that Plaintiff has never made, with which Plaintiff does not agree, and that would be offensive to many Lake County Republican party members.

30. On or about before August 31, 2015, Defendants John and/or Jane Doe #1 caused said electronic mail message to come into the possession of Defendants Clair and Fellows, still containing Plaintiff’s identifying information and purporting to have been created and sent by Plaintiff, an act that, if charged criminally, would constitute a felony of the fifth degree.

31. Said electronic mail message and its contents caused Plaintiff to suffer psychological damage, emotional distress, loss of standing in her community, damage to her reputation, lost future earning capacity, and irreparable harm to her professional career.

32. Wherefore, the Plaintiff prays for damages against the Defendants John and/or Jane Doe #1 jointly and severally, in an amount in excess of \$25,000.00 (Twenty Five Thousand Dollars) which sum will fairly and fully compensate her pursuant to all applicable laws together with attorneys’ fees and the cost of this action.

## **COUNT TWO: IDENTITY FRAUD II**

(As to Defendants John and/or Jane #2)

33. Plaintiff reavers all prior statements, averments and allegations set forth in Plaintiff’s Complaint as though fully rewritten herein.

34. At some time prior to August 31, 2015, Defendants John and/or Jane Doe #2 came into possession of Plaintiff’s identifying information, i.e., Plaintiff’s electronic mail address, with the intent to use Plaintiff’s electronic mail address to hold him or herself out as Plaintiff by composing and sending an email purported to be from Plaintiff’s electronic mail address even though it was not.

35. Said electronic mail purported to have been created on Monday, February 17, 2015 at 12:01 am and contained the subject line Christian Values.

36. Said electronic mail contained the text: “The enemy is among us. We live I dangerous times reflected upon in the holy scriptures. I hope everyone saw my posts regarding the mark of

the beast. I know we all are prepared for our time. There are others who want to walk amongst us, wolves clothed as sheep, like Kristen Peters and our ‘republican party leadership.’ They say they have the same values as us, they say they have conservative values like us, but they deny Christ. The scriptures have made it very clear not to trust anyone who is not a believer – they will try to trick and manipulate us. We need to stand firm against those who wish to knock down our Christian values.”

37. Said statements are statements with which Plaintiff does not agree, statements that Plaintiff never had made, and statements that would be offensive to many members of the Lake County Republican party.

38. On or about before August 31, 2015, Defendants John and/or Jane Doe #2 created an electronic mail message using Plaintiff’s identifying information and causing said electronic message to appear to have been created by Plaintiff, though it was not (Copy attached hereto as Exhibit 2).

39. On or about before August 31, 2015, Defendants John and/or Jane Doe #1 caused said electronic mail message to come into the possession of Defendants Clair and Fellows, still containing Plaintiff’s identifying information and purporting to have been created and sent by Plaintiff, an act that, if charged criminally, would constitute a felony of the fifth degree.

40. Said electronic mail message and its contents caused Plaintiff to suffer psychological damage, emotional distress, loss of standing in her community, damage to her reputation, lost future earning capacity, and irreparable harm to her professional career.

41. Wherefore, the Plaintiff prays for damages against the Defendants John and/or Jane Doe #2, jointly and severally, in an amount in excess of \$25,000.00 (Twenty Five Thousand Dollars) which sum will fairly and fully compensate her pursuant to all applicable laws together with attorneys’ fees and the cost of this action.

### **COUNT THREE: DEFAMATION**

(As to Defendant Clair)

42. Plaintiff reavers all prior statements, averments and allegations set forth in Plaintiff’s Complaint as though fully rewritten herein.

43. On or about August 31, 2015, the regular monthly meeting of the Lake County Republican Party Central Committee was held. Said meeting was open to the public, as Central Committee meetings customarily were, with several elected officials, members of the public, and numerous Central Committee members present. Upon information and belief, an Executive Committee meeting, attended by only the two Chairs, the two Vice Chairs, the Secretary and the Treasurer



of the Lake County Republican Party, met immediately before the Central Committee meeting. Plaintiff was neither informed in advance of this Executive Committee meeting, nor invited to attend the meeting.

44. The agenda of said Central Committee meeting was devoted to agreeing upon endorsements for Republican 2015 and 2016 local candidates. The 2015 presented themselves as candidates before the meeting and endorsements for said candidates were voted upon. There was no opportunity presented for questions to the candidates from the floor.

45. Following said endorsements, Plaintiff was invited to make a statement to the Committee regarding her own planned candidacy for Lake County Commissioner in 2016. After Plaintiff's statement was complete, the floor was asked by the Chairman, "Does anyone have any questions for Kim?" Defendant Clair, with a conscious disregard for the rights and safety of other persons that has a great probability of causing substantial harm, began a lengthy peroration, reminding the gathering that Plaintiff had pledged the previous year not to work against Congressman Joyce. Defendant Clair then retrieved a stack of approximately one hundred preprinted copies of the two emails that had been prepared by John and/or Jane Does #1 and #2 and distributed the copies to each and every individual present, except Plaintiff, and then, with intent to injure Plaintiff in her trade or business, Defendant Clair stated, knowing that her statements were false, that the contents of the just-distributed emails, purportedly written by Plaintiff, illustrated that Plaintiff is not a woman of her word and does not have the character the Lake County Republican Party wants in a candidate on the Republican ticket.

45. Plaintiff was not aware before the meeting that said allegations would be made, did not receive a copy of the fraudulent emails, and was not asked for a statement regarding the authenticity of the fraudulent emails by any of the Defendants before copies of said emails were presented to the meeting.

46. Plaintiff obtained a copy of the fraudulent emails during Defendant Clair's lengthy statement and immediately spoke out at least three times denying authorship of the emails. Defendant Clair did not halt not amend her defamatory tirade.

47. Plaintiff requested an opportunity to respond while Defendant Clair was speaking, in answer to which Defendant Clair faced Plaintiff and said "No! You had your chance to talk, now it's my turn."

48. Despite requests from the floor, Plaintiff was not afforded an opportunity to speak during the August 31, 2015 meeting to respond to Defendant Clair's defamatory statements.

43. Said false and defamatory statements made by Defendant Clair caused Plaintiff to suffer psychological damage, emotional distress, loss of standing in her community, damage to her reputation, lost future earning capacity, and irreparable harm to her professional career.

44. Wherefore, the Plaintiff prays for damages against Defendant Clair in an amount in excess of \$25,000.00 (Twenty Five Thousand Dollars) which sum will fairly and fully compensate her pursuant to all applicable laws together with attorneys' fees and the cost of this action.

#### **COUNT FOUR: OBSTRUCTION OF JUSTICE**

(As to Defendant Clair)

45. Plaintiff reavers all prior statements, averments and allegations set forth in Plaintiff's Complaint as though fully rewritten herein.

46. Immediately after the Central Committee meeting that occurred on or about August 31, 2015, Plaintiff requested of Defendant Clair that Defendant Clair forward the fraudulent emails to Plaintiff in order that Plaintiff would be able to attempt to determine what individual or individuals created said emails. Defendant Clair refused to forward the emails to Plaintiff.

47. On or about September 4, 2015, Plaintiff filed a report with the Willoughby, Ohio Police Department as Plaintiff is a resident of Willoughby requesting that the Police Department investigate the possible criminal nature of the fraudulent emails. On or about September 29, 2015, Detective Sergeant Derrick A. Stewart of the Willoughby Police Department contacted Defendant Clair by telephone regarding said investigation.

48. On or about September 29, 2015, Defendant Clair, with purpose to hinder the discovery, apprehension, prosecution, conviction, or punishment of another, did communicate false information to Sergeant Stewart by stating that Defendant Clair was not in possession of the forwarded email, that she did not know who had the original copies of the emails, and suggesting that Sergeant Stewart speak with Defendant Fellows.

49. Upon information and belief, the identitie(s) of the author(s) of the fraudulent emails have not been discovered.

50. The continuing unknown origin of the fraudulent emails used to defame and injure Plaintiff is a direct and proximate result of Defendant Clair's acts and statements that prevented or obstructed Sergeant Stewart and Plaintiff, by means of deception, from performing acts to aid in the discovery, apprehension, or prosecution of the fraudulent-email author(s), acts that, if charged criminally, would be a felony of the fifth degree.

51. Wherefore, the Plaintiff prays for damages against the Defendant Clair in an amount in excess of \$25,000.00 (Twenty Five Thousand Dollars) which sum will fairly and fully

compensate her pursuant to all applicable laws together with attorneys' fees and the cost of this action.

**COUNT FIVE: OBSTRUCTION OF JUSTICE**

(As to Defendant Fellows)

52. Plaintiff reavers all prior statements, averments and allegations set forth in Plaintiff's Complaint as though fully rewritten herein.

53. On or about September 29, 2015, Sergeant Stewart spoke with Defendant Fellows by telephone.

54. On or about September 29, 2015, Defendant Fellows, with purpose to hinder the discovery, apprehension, prosecution, conviction, or punishment of another, did communicate false information to Sergeant Stewart by stating that Defendant Fellows had no idea of the identity of the original person who sent out the email, but the email listed to maddytd4@att.net, has no idea how to obtain email headers to help determine the sender, that the computer containing the email obtained a virus, that Defendant Fellows no longer can access the account to forward the email, that Defendant Fellows printed out copies of the email prior to the computer virus, that both emails were forwarded from maddytd4@att.net to John Clark and John Clark forwarded the emails, which then were sent to Defendant Fellows, and that Defendant Fellows declined to involve the individual who forwarded the emails to him, and that Defendant Fellows redacted the email address prior to scanning.

55. Upon information and belief, the identitie(s) of the author(s) of the fraudulent emails have not been discovered.

56. The continuing unknown origin of the fraudulent emails used to defame and injure Plaintiff is a direct and proximate result of Defendant Fellow's acts and statements that prevented or obstructed Sergeant Stewart and Plaintiff, by means of deception, from performing acts to aid in the discovery, apprehension, or prosecution of the fraudulent-email author(s), an act that, if charged criminally, would be a felony of the fifth degree.

57. Wherefore, the Plaintiff prays for damages against Defendant Fellows in an amount in excess of \$25,000.00 (Twenty Five Thousand Dollars) which sum will fairly and fully compensate her pursuant to all applicable laws together with attorneys' fees and the cost of this action.

**COUNT SIX: DEFAMATION III**

(With regard to Defendants Fellows, Sabath, Wuliger, Vitaz, Betteley, and Clair)

58. Plaintiff reavers all prior statements, averments and allegations set forth in Plaintiff's Complaint as though fully rewritten herein.

59. On or about September 25, 2015, Defendant Fellows sent an email to the Lake County Republican Party Central Committee members notifying them that the Executive Committee meeting previously scheduled for September 28, 2015 was cancelled because the new headquarters was not yet ready and stating that “the good news is we do not have any pressing issues that require our immediate action,” even though the slander of Plaintiff had been scheduled to be discussed at the September 28 meeting.

60. On or about October 26, 2015, the Lake County Republican Party Executive Committee meeting was held at the Mentor Library, where the early closing hours mandated an abbreviated meeting. Once again, the slander of Plaintiff was not addressed.

61. On or about November 30, 2015, the Lake County Republican Party Executive Committee meeting was held. The fraudulent emails were discussed at said meeting. Plaintiff requested that all officers forward to her copies of the emails. The Defendants Executive Committee refused to do so, stating that they wished to protect the person(s) who sent said emails to them.

62. On or about December 7, 2015, a letter signed by Defendants Executive Committee was sent to the Lake County Republican Party Central Committee members.

63. In said letter, with intent to injure Plaintiff in her trade or business, Defendants Executive Committee stated, with a conscious disregard for the rights and safety of other persons that has a great probability of causing substantial harm, knowing that said statements were false, that “Chairman Fellows and Chairwoman Clair assisted in the [Willoughby Police] investigation, including providing copies of the e-mails to the investigating officer.”

64. Defendants Executive Committee continued in said letter, again with intent to injure Plaintiff in her trade or business, knowing said statements were false, that “We continue to think it is important to determine the source of the e-mails and are moving forward. Ms. Laurie’s cooperation with that effort would be extremely helpful. Chairman Fellows attempted to contact Ms. Laurie multiple times about working together this way, . . . but she has yet to return his calls.”

65. Said false and defamatory statements made by Defendants Executive Committee caused Plaintiff to suffer psychological damage, emotional distress, loss of standing in her community, damage to her reputation, lost future earning capacity, and irreparable harm to her professional career.

66. Wherefore, the Plaintiff prays for damages against Defendants, jointly and severally, in an amount in excess of \$25,000.00 (Twenty Five Thousand Dollars) which sum will fairly and fully compensate her pursuant to all applicable laws together with attorneys’ fees and the cost of this action.

**COUNT SEVEN:INTIMIDATION**

(With regard to Defendants Fellows, Clair, Sabath, Wuliger, Betteley, and Vitaz)

67. Plaintiff reavers all prior statements, averments and allegations set forth in Plaintiff's Complaint as though fully rewritten herein.

68. During the Executive Committee meeting held on or about August 31, 2015, the Defendants Executive Committee did agree, and it was the intent of all of them, to present the fraudulent emails composed by John and/or Jane Does #1 and #2, without notifying Plaintiff an advance and without affording an opportunity at the Central Committee meeting for Plaintiff to address the issues of the emails and/or Defendant Clair's defamatory statements regarding Plaintiff.

69. On or about August 31, 2015 and thereafter, Defendants, by using a materially false or fraudulent writing, i.e., the fraudulent emails presented to the Lake County Republican Party Central Committee by Defendant Clair, did, with malicious purpose, in bad faith, and/or in a wanton or reckless manner, attempt to influence Plaintiff, a party official of the Lake County Republican Party, in the discharge of Plaintiff's duty.

70. Wherefore, the Plaintiff prays for damages against Defendants, jointly and severally, in an amount in excess of \$25,000.00 (Twenty Five Thousand Dollars) which sum will fairly and fully compensate her pursuant to all applicable laws together with attorneys' fees and the cost of this action.

**COUNT EIGHT: INTIMIDATION II**

(With regard to Defendants Fellows, Clair, Sabath, Wuliger, and Vitaz)

71. Plaintiff reavers all prior statements, averments and allegations set forth in Plaintiff's Complaint as though fully rewritten herein.

72. On or about December 7, 2015 and thereafter, Defendants Executive Committee, by using a materially false or fraudulent writing, did, with malicious purpose, in bad faith, and/or in a wanton or reckless manner, attempt to influence Plaintiff, a party official of the Lake County Republican Party, in the discharge of Plaintiff's duty.

73. Wherefore, the Plaintiff prays for damages against Defendants, jointly and severally, in an amount in excess of \$25,000.00 (Twenty Five Thousand Dollars) which sum will fairly and fully compensate her pursuant to all applicable laws together with attorneys' fees and the cost of this action.

**DEMAND FOR A JURY TRIAL**

Plaintiff hereby demands a trial by a jury.

WHEREFORE, Plaintiff prays for the following:

General and special damages in an amount in excess of \$25,000;  
Punitive damages to the extent that that this Court determines that Defendants' conduct merits punitive damages;  
Reasonable attorney fees;  
Court costs;  
Pre and post-judgment interest; and  
Any award that this Honorable Court deems fair and just.

Respectfully submitted,

/s/ Gregory C. Sasse

Gregory C. Sasse, Esq. (0032539)

11509 Lorain Avenue

Cleveland, OH 44111

Phone: (440) 488-1919

Fax: (440) 359-8755

gregory.sasse@yahoo.com

Attorney for Plaintiff

# **EXHIBIT 1.**

...Original Message-----

From: "Kim Laurie" <[kimlaurie@1791.com](mailto:kimlaurie@1791.com)>

Sent: Tuesday, February 17, 2015 11:51pm

To: Undisclosed Recipients

Subject: Rino's

I'm sure most of you've seen Chuck's email in regards to supporting the right candidates. This is important to guide us in our cause for Liberty and Christ. We were successful in fighting back a Rino candidate, George Phillips in 2014. We weren't successful in ousting Kasich and Joyce but we continue to work. We have to replace the Rino's who're running in 2015 with quality candidates. This includes finding a replacement candidate for Kristin Peters, as she's been getting cozy with our Rino enemies. Kim.

Sent on a Sprint Samsung Galaxy S® III



# **EXHIBIT 2.**

-----Original Message-----

From: "Kim Laurie" <[kimlaurie@1791.com](mailto:kimlaurie@1791.com)>

Sent: Monday, February 23, 2015 12:01 am

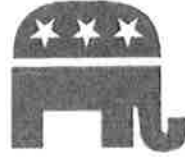
To: Undisclosed Recipients

Subject: Christian Values

The enemy is among us. We live in dangerous times reflected upon in the holy scriptures. I hope everyone saw my posts regarding the mark of the beast. I know we all are prepared for our time. There are others who want to walk amongst us, wolves clothed as sheep, like Kristin Peters and our "republican party leadership". They say they have the same values as us, they say they have conservative values like us, but they deny Christ. The scriptures have made it very clear not to trust anyone who is not a believer - they will try to trick and manipulate us. We need to stand firm against those who wish to knock down our Christian values. Kim.

Sent on a Sprint Samsung Galaxy S® III

# **EXHIBIT 3.**



# LAKE COUNTY REPUBLICAN PARTY

505 LIBERTY STREET • PAINESVILLE, OH 44077 • (440) 357-1200 • FAX (440) 352-0738 • [www.lakegop.com](http://www.lakegop.com)

Dear Central Committee Members,

Recently you received some letters from Kim Laurie regarding a couple of e-mails purported to be from her. In those letters she made several accusations that are untrue and factually incorrect. After her first letter, we thought it best not to respond, and we felt it vitally important to keep our focus on the goals of electing republicans and advancing the conservative cause. After her second letter, we feel compelled to share with you the facts.

Earlier this year, the officers became aware of some e-mails circulating that appeared to be from Ms. Laurie. The content of the e-mails were bizarre. With more and more people forwarding them, and more people discussing them privately, we thought it was important to allow Ms. Laurie a chance to explain them. We gave her that opportunity at the August Central Committee meeting. At that time, she denied writing them. We accepted her denial at face value.

Some days after the meeting, Ms. Laurie went to the Willoughby Police to initiate a criminal investigation into the origin of the e-mails. Chairman Fellows and Chairwoman Clair assisted in the investigation, including providing copies of the e-mails to the investigating officer. On October 26<sup>th</sup>, Chairman Fellows learned from a Willoughby Detective that the case had been closed. Ms. Laurie states in her most recent letter that she was aware of that fact as early as "mid-September".

We continue to think it is important to determine the source of the e-mails and are moving forward. Ms. Laurie's cooperation with that effort would be extremely helpful. Chairman Fellows attempted to contact Ms. Laurie multiple times about working together this way prior to the sending of her most recent letter, but she has yet to return his calls.

DALE H. FELLOWS  
Chairman

AMY SABATH  
1st Vice Chair

JASON WULIGER  
2nd Vice Chair

DAVID VITAZ  
Treasurer

SUE BETTELEY  
Secretary

JANET CLAIR  
Chairwoman

Ms. Laurie contends that she has been denied access to the e-mails. Given the amount of discussion and forwarding that had taken place before the August Central Committee Meeting, we were surprised that she did not already have copies of the e-mails. However, she received copies of them that evening. Ms. Laurie also has a copy of the Police report, which has the e-mails attached.

In response to Ms. Laurie's recent letter, we provided her with another copy of the e-mails prior to Monday nights' meeting.

Finally, at our Executive Committee Meeting this past Monday, November 30<sup>th</sup>, we afforded Ms. Laurie an open-ended amount of time to discuss this matter at the beginning of our meeting (more than 30 minutes were spent).

We regret that this matter has taken up so much of your time and your mailbox. We remain committed to working with Ms. Laurie to learn all the facts about the e-mails. At the same time, we urge her to avoid unhelpful and offensive language like inserting her name into a poem originally written about the victims of Nazi persecution, as she did in her last letter. And we are saddened to continue to have Ms. Laurie personally attack the Chairman and Chairwoman who have always upheld the integrity of our Party.

More importantly, we remain committed to working together to elect a Republican President in 2016 and to electing all members of our Republican slate. There is much work to be done if we are going to set this Country on the right track, and we will only accomplish our shared goals if we work together.

Please feel free to call us any time regarding this or any other matter concerning our Party at 440-357-1200.

We look forward to your continued help and support as we work toward a united victory next November!

Dale, Amy, Jason, Sue, Dave, Jan