



FORMAL NOTICE OF VIOLATIONS AND DEMAND FOR REMOVAL OF HCREC OFFICERS

To: Chairperson, Secretary, Parliamentarian, Officers, and Voting Members of the Hillsdale County Republican Executive Committee

Re: Formal Notice of Violations; Demand for Removal of HCREC Officers Pursuant to Article IV, Section 3

I. PURPOSE OF THIS NOTICE

This document constitutes formal written notice to the Hillsdale County Republican Executive Committee concerning continuing violations of Michigan Election Law, Michigan Republican State Committee Bylaws, Hillsdale County Republican Executive Committee Bylaws, and duly constituted Republican District and State Party actions.

It further constitutes a formal demand that an eligible voting member of the HCREC move for removal of the responsible officers pursuant to Article IV, Section 3 of the HCREC Bylaws.

This notice is being submitted in writing so there can be no future dispute concerning:

- whether the HCREC and its officers were informed of these violations;
- whether the governing legal and Party authorities were identified;
- whether corrective action was requested;
- whether officer removal was expressly requested under the HCREC's own bylaws;
- whether the HCREC membership was given an opportunity to act; and
- what action, if any, the HCREC and its members chose to take after receiving notice.

II. AUTHORITY FOR REMOVAL

Article IV, Section 3 of the HCREC Bylaws provides that an officer is subject to removal from office by majority vote at a meeting of the HCREC for failure to fulfill the responsibilities of that office as established by the bylaws.

The HCREC Bylaws further require the organization to perform applicable duties imposed by law and to operate in accordance with duly constituted Republican organizations, conventions, and Michigan Party governance.

Accordingly, compliance with Michigan Election Law and Michigan Republican Party governance is not optional under the HCREC's own governing documents.

III. MICHIGAN ELECTION LAW

MCL 168.623a governs the allotment of Republican precinct delegates.

The statute assigns responsibility for precinct-delegate certification to the county committee chair and requires delegate positions throughout Michigan to be apportioned, as nearly as practicable, equally according to the applicable Republican vote.

Hillsdale County's Republican precinct-delegate allotment has instead repeatedly declined:

2020 - 133 | 2022 - 100 | 2024 - 50 | 2026 - 43

The 2026 certification restricted Hillsdale County to only 43 precinct-delegate positions.

That structure failed to satisfy the statewide near-equal-apportionment requirement imposed by Michigan Election Law.

Its consequences were direct.

The reduced allotment limited the number of Hillsdale Republicans who could become elected precinct delegates.

Those precinct delegates then constituted the voting electorate at the Hillsdale County Republican Convention.

The restricted delegate base therefore directly affected who possessed the right to participate in county Party governance and the selection of Hillsdale County's State Convention representation.

IV. MICHIGAN REPUBLICAN STATE COMMITTEE BYLAWS

Article XIII(I) of the Michigan Republican State Committee Bylaws independently requires the county executive committee chair to certify precinct-delegate allotments according to a near-equal statewide apportionment based upon the applicable Republican vote.

The 43-position Hillsdale structure therefore presented two separate compliance problems:

First: compliance with MCL 168.623a.

Second: compliance with Article XIII(I) of the Michigan Republican State Committee Bylaws.

The HCREC cannot disregard superior Party governance while simultaneously claiming compliance with local bylaws that expressly require adherence to that governance.

V. VIOLATION OF HCREC BYLAWS

Article I of the HCREC Bylaws requires the organization to perform applicable duties provided by law and to promote the Republican Party in accordance with duly constituted Republican organizations and conventions.

Article II provides that the HCREC is established as provided by law and by the Bylaws of the Michigan Party.

The continued operation of the HCREC under a precinct-delegate structure contrary to Michigan Election Law and Michigan Republican Party bylaws therefore constitutes a violation of the HCREC's own governing requirements.

These violations concern the central structure through which Republican voters obtain representation inside the county Party.

They are not merely procedural technicalities.

VI. PRIOR NOTICE

The continuing nature of these violations is critical.

This matter did not first arise in 2026.

The declining delegate allotment and related governance problems have repeatedly been brought before Republican Party bodies.

On February 17, 2023, the Fifth Congressional District unanimously adopted a resolution censuring Brent Leininger, Abraham Dane, and other individuals involved in the Hillsdale controversy.

That resolution became part of the Fifth District caucus report submitted to the February 18, 2023 Michigan Republican State Convention.

The controversy nevertheless continued.

The Hillsdale precinct-delegate allotment subsequently declined again.

The same underlying dispute continued through the 2024 and 2026 election cycles.

VII. 2026 MICHIGAN REPUBLICAN PARTY POLICY COMMITTEE ACTION

In 2026, the Michigan Republican Party Policy Committee formally reviewed the Hillsdale dispute.

The Policy Committee expressly concluded that the Hillsdale County Party and Executive Committee had acted in bad faith toward members and delegates.

The Committee specifically addressed the 2026 precinct-delegate allocation and required corrective action using a consistent lawful allocation methodology.

The corrective action contemplated an irrevocable direction concerning the allocation to the Hillsdale County Clerk.

The Policy Committee further identified refusal of credentials at future Republican State Conventions as a consequence for continued noncompliance.

Despite that intervention, Hillsdale County's delegate allotment declined again:

50 positions in 2024 became 43 positions in 2026.

The HCREC officers therefore cannot reasonably characterize the 2026 controversy as an unknown mistake or an issue about which they had no warning.

VIII. AUGUST 13, 2026 COUNTY CONVENTION

The consequences of the restricted delegate structure became concrete at the August 13, 2026 Hillsdale County Republican Convention.

The 43-position allotment determined the elected precinct-delegate base entitled to participate in that convention.

Further controversy arose during the filling of vacant precinct-delegate positions.

Persons physically present and willing to serve were displaced from a proposed slate.

Other persons were placed upon the successful slate, including at least one individual who was absent, had not agreed to be nominated, and did not know the convention was purporting to place that individual into a precinct-delegate position.

An attempt to raise objections concerning that process was prevented.

This conduct further demonstrates why lawful delegate representation and transparent Party procedure are essential.

IX. AUGUST 22, 2026 STATE CONVENTION CREDENTIALS ACTION

The dispute subsequently reached the August 22, 2026 Michigan Republican State Convention.

A credentials challenge concerning the Hillsdale delegation submitted under the authority of Brent Leininger was brought by Fifth Congressional District Chairman Benjamin Myers.

That challenge was sustained.

The delegation submitted under Leininger's authority was denied credentials.

The credentials action followed years of District involvement, State Convention proceedings, internal Party disputes, and the 2026 Policy Committee corrective action.

The HCREC is therefore no longer dealing merely with accusations made by individual Hillsdale Republicans.

Superior Republican Party bodies have repeatedly been required to address the consequences of the HCREC's continuing governance problems.

X. RESPONSIBILITY OF THE CHAIRPERSON

The HCREC Chairperson bears the most direct responsibility concerning the precinct-delegate allotment.

Michigan Election Law places the certification duty upon the county Party chair.

Article XIII(I) of the Michigan Republican State Committee Bylaws likewise places the corresponding Party certification duty upon the county executive committee chair.

The 2026 certification produced only 43 positions.

The Chairperson was therefore directly responsible for ensuring that the certification complied with the law and governing State Party bylaws.

The HCREC Bylaws separately impose upon the Chairperson responsibility for managing the affairs of the organization, coordinating Party activity within the county, and keeping the HCREC informed concerning Party activities.

XI. RESPONSIBILITY OF ABRAHAM DANE AND THE OVERLAP OF PARTY AND PUBLIC ELECTION AUTHORITY

Abraham Dane has occupied a particularly significant dual position.

He has served as an officer within the same county Republican organization while simultaneously serving as Hillsdale County Clerk.

Under MCL 168.23, the County Clerk is a member and secretary of the Board of County Election Commissioners.

Accordingly, Dane occupied:

- an internal Party position within the organization benefiting from the restricted delegate structure; and
- a governmental election position inside the machinery through which precinct-delegate elections were administered.

The direct certification duty under MCL 168.623a belongs to the county Party chair.

This notice does not incorrectly assign that particular statutory duty to the County Clerk.

The concern is instead the overlapping Party and governmental participation surrounding a structure that continued despite repeated notice and corrective action.

The available record raises legitimate questions regarding coordinated or concerted conduct among persons exercising Party authority and governmental election authority.

XII. COORDINATED AND CONCERTED CONDUCT

The continuing pattern warrants examination beyond isolated acts.

The delegate allotment declined repeatedly:

133 -> 100 -> 50 -> 43

The conduct continued after:

- internal objections;
- Fifth Congressional District action;

- State Convention action;
- prior credentials disputes;
- formal State Party review;
- a Policy Committee finding of bad faith;
- an express corrective directive; and
- warnings concerning future denial of credentials.

The record therefore presents substantial grounds to examine whether multiple actors acted in concert to maintain, implement, defend, or preserve the restricted organizational structure.

Whether particular conduct satisfies the elements of criminal conspiracy, election-law offenses, misconduct in office, or other criminal or civil violations is ultimately a matter for the appropriate governmental investigative authorities and courts.

The HCREC need not adjudicate criminal liability to exercise its own authority under Article IV, Section 3.

It need only determine whether its officers have fulfilled the responsibilities imposed upon them by the HCREC Bylaws.

XIII. RESPONSIBILITY OF THE REMAINING HCREC OFFICERS

The fact that some duties are uniquely assigned to the Chairperson does not eliminate the responsibilities of the other officers.

The Parliamentarian is expressly responsible for ensuring compliance with HCREC procedure, assisting in interpretation of the bylaws, and ensuring that the HCREC Bylaws remain legally compliant with Michigan Republican Party governance.

The Secretary is responsible for permanent meeting records, attendance records, minutes, required notices, and making records available as provided by the bylaws.

The Treasurer and Deputy Treasurer occupy positions of fiduciary responsibility concerning HCREC finances, property, records, and financial reporting.

The Vice Chairperson is an elected HCREC officer authorized to exercise the powers and duties of the Chairperson when required.

Each officer remains responsible for his or her own acts, omissions, participation, knowledge, and duties.

This notice does not contend that every officer personally performed the same act.

It contends that the Executive Committee has continued operating under a structure repeatedly found deficient, after years of notice and intervention, without sufficient corrective action from those entrusted with governing the organization.

XIV. DEMAND FOR REMOVAL

Accordingly, I formally demand that an eligible voting member of the Hillsdale County Republican Executive Committee make the following motion:

"Pursuant to Article IV, Section 3 of the HCREC Bylaws, I move to remove the officers of the Hillsdale County Republican Executive Committee for failure to fulfill the responsibilities of their respective offices, including continuing to administer, participate in, permit, defend, or fail to correct organizational conduct contrary to Michigan Election Law, Michigan Republican State Committee Bylaws, HCREC Bylaws, and duly constituted District and State Republican Party actions."

If parliamentary procedure requires separate consideration of individual officers, I request that the question be divided and that each officer be considered separately.

XV. REQUEST FOR AN OFFICIAL RECORD

Whether or not any voting member is willing to make the requested motion, I formally request that:

1. this complete written notice be received and maintained as an official record of the HCREC;
2. this notice be identified in the minutes of the meeting at which it is presented;
3. the minutes state that removal of the officers pursuant to Article IV, Section 3 was formally demanded;
4. the Chair ask whether any eligible HCREC voting member will make the requested motion;
5. if a member makes the motion, the motion, second, debate, and disposition be fully recorded;
6. if no eligible voting member is willing to make the motion, the minutes state that the demand for removal was presented and that no eligible member moved the question;
7. if the Chair refuses to ask for the motion or otherwise prevents the matter from being presented, that ruling or refusal be reflected in the minutes;
8. any point of order, parliamentary ruling, appeal, or other disposition concerning this notice be preserved in the permanent record; and
9. the Secretary preserve this document together with the official records of the meeting.

XVI. NOTICE TO EVERY HCREC MEMBER

Every HCREC officer and voting member receiving this document is now on formal notice of the matters contained herein.

The purpose of this notice is not merely to revisit prior political disagreements.

It is to establish whether those entrusted with governing the Hillsdale County Republican organization will exercise the accountability provisions contained in their own bylaws after being presented with:

- Michigan Election Law;
- Michigan Republican State Committee Bylaws;
- HCREC Bylaws;
- years of declining precinct-delegate representation;
- Fifth Congressional District action;
- State Convention action;
- a Michigan Republican Party Policy Committee finding of bad faith;
- a specific corrective directive; and
- subsequent State Convention credentials action.

No future officer or member receiving this notice should be able to credibly claim that these matters were unknown, concealed, or never formally presented to the HCREC.

XVII. FORMAL DEMAND

I therefore demand that the HCREC confront the record before it.

I demand that an eligible voting member move for removal of the officers under Article IV, Section 3.

If no voting member will do so, then I demand that the permanent records of this organization plainly reflect that fact.

**The members of this Committee are entitled to vote as they choose.
They are not entitled to erase the fact that the choice was placed before them.**

Submitted by: Lance Lashaway

Republican Precinct Delegate

Precinct/Township: Woodbridge Township

Date: August 31, 2026



RECEIPT AND ACKNOWLEDGMENT OF FORMAL NOTICE

The signatures below acknowledge receipt of the Formal Notice of Violations and Demand for Removal of HCREC Officers. Acknowledgment of receipt does not indicate agreement with its contents.

Chairperson: _____ **Date:** _____

Secretary: _____ **Date:** _____

Parliamentarian: _____ **Date:** _____