

FILED
COURT OF APPEALS
DIVISION II

2017 JUL -5 AM 9:19

STATE OF WASHINGTON

No. 50367-1-II

BY _____
DEPUTY

COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

CHUCK HAUNREITER, Appellant

v.

LEWIS COUNTY DEMOCRAT
CENTRAL COMMITTEE, et al, Defendants

BRIEF OF APPELLANT

By Chuck Haunreiter

Appellant, Pro Se

1149 SW Cascade Ave. #2

Chehalis, WA 98532

(360) 262-6454

PM 7-3-17

TABLE OF CONTENTS

I. Introduction	1
-----------------------	---

II. ASSIGNMENTS OF ERROR	1
--------------------------------	---

Assignments of Error

No. 1	1
-------------	---

No. 2	1
-------------	---

No. 3	2
-------------	---

No. 4	2
-------------	---

No. 5	2
-------------	---

No. 6	2
-------------	---

No. 7	3
-------------	---

No. 8	3
-------------	---

No. 9	3
-------------	---

No. 10	4
--------------	---

Issues Pertaining to Assignments of Error

No. 1	4
No. 2	4
No. 3	5
No. 4	5
No. 5	6
No. 6	6
No. 7	6
No. 8	7
No. 9	8
No. 10	8
III. Statement of the Case	8
IV. Summary of Argument	10
V. Argument	15
VI. Conclusion	15

TABLE OF AUTHORITIES

Washington Constitutional Provisions

Article 1, sections 33 and 34	32
-------------------------------------	----

United States Constitutional Provisions

First Amendment	1,9,26,27,28
Fourteenth Amendment	28

Statutes

RCW 7.40.020	18,20
RCW 29A.80	29
RCW 29A.80.030	29
RCW 29A.80.041	30
RCW 29A.80.051.....	31
RCW 29A.56.110	31

I. Introduction

Respondents Lewis County Democrat Central Committee banned Appellant Chuck Haunreiter from attending their Central Committee meetings in retaliation for Haunreiter exercising his First Amendment right to free speech.

II. ASSIGNMENTS OF ERROR

1. The trial court committed error by finding Haunreiter in violation of CR 11 because his motion was not well-grounded in fact or warranted by existing law.
2. The trial court committed error by ordering that sanctions must be paid to Respondent's attorney prior to Haunreiter filing for any further affirmative relief.

3. The trial court committed error by denying Haunreiter's request for a finding that the Executive Board of the Lewis County Democrat Central Committee had no authority to ban him from Central Committee meetings.
4. The trial court committed error by finding that the Lewis County Democrat Central Committee is a private organization as it pertained to Haunreiter.
5. The trial court committed error by claiming it could not fashion an equitable remedy when Haunreiter lost his bid for re-election as a Precinct Committee Officer (PCO) before this case could be fully litigated.
6. The trial court committed error by denying Haunreiter's motion that all actions of the Lewis

County Democrat Central Committee be declared null and void during the time while he was a PCO and unconstitutionally banned from attending Central Committee meetings.

7. The trial court committed error by finding that Haunreiter could not be granted his request to attend Central Committee meetings after he lost his bid for re-election as a PCO.
8. The trial court committed error by denying that Haunreiter would suffer immediate and irreparable injury, loss, or damage if he was not allowed to attend the Central Committee meetings.
9. The trial court committed error by finding that the issues Haunreiter raised in his Motion for

Injunctive Relief had to wait for trial.

10. The trial court committed error by not forcing Respondents to fully respond to Haunreiter's Motion for Injunctive Relief.

**ISSUES PERTAINING TO ASSIGNMENTS OF
ERROR**

1. Should Haunreiter have been found in violation of CR 11 when he cited facts, existing law and a good faith argument for extension of existing law, and was not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation?
2. Did the trial court have authority to order that sanctions must be paid to Respondent's attorney prior to filing for any further affirmative relief?

3. Was it proper for the trial court to decide that the Executive Board of the Lewis County Democrat Central Committee had authority to ban Haunreiter from Central Committee meetings in violation of state law, the Charter of the Democratic Party of the State of Washington, the Bylaws of the Democratic Party of the State of Washington, and the Lewis County Democrat Central Committee Bylaws?
4. Was it proper for the trial court to find that the Lewis County Democrat Central Committee is a private organization as it pertained to Haunreiter in violation of state law, the Charter of the Democratic Party of the State of Washington, the Bylaws of the Democratic Party of the State of

Washington, and the Lewis County Democrat

Central Committee Bylaws?

5. Could the trial court have fashioned some sort of equitable relief when the clock ran out before this case was fully litigated and Haunreiter lost his bid for re-election as a PCO?
6. Given that a PCO has the duty to vote on motions, resolutions, elections and any other party business performed at Central Committee meetings, are those motions, resolutions, elections and any other party business performed at Central Committee meetings binding when Haunreiter was unconstitutionally banned from attending those Central Committee meetings?
7. When the Charter of the Democratic Party of the

State of Washington and the Lewis County

Democrat Central Committee Bylaws clearly state in effect that “All Lewis County residents who are registered voters and declare themselves affiliated with the Democrat Party are considered to be members of the Lewis County Democrat Party,” was it proper for the trial court to deny

Haunreiter’s request to be allowed to attend the Lewis County Democrat Central Committee meetings after he lost his bid for re-election as a PCO?

8. When Haunreiter argued that as a politician, he needed to attend the Central Committee meetings to keep up to date on issues and candidates, was it proper for the trial court to find that there was no

showing of immediate and irreparable injury, loss, or damage?

9. Did the issues Haunreiter raised in his Motion for Injunctive Relief have to wait for trial?
10. Was it proper for the trial court to find that Respondents did not have to fully respond to Haunreiter's Motion for Injunctive Relief until trial?

III. STATEMENT OF THE CASE

Appellant Chuck Haunreiter, an elected Precinct Committee Officer (PCO), was locked out of the Lewis County Democrat Central Committee meetings in February 2016. (CP 20, l. 15; CP 29, l. 12-20).

The reason Haunreiter was locked out of the Central

Committee meetings was in retaliation for exercising his First Amendment right to free speech. (CP 20, l. 5; CP 23, l. 4-CP 29, l. 8; CP 49-65)

At the hearing held on Haunreiter's Motion for Injunctive Relief held on January 27, 2017, Haunreiter was prepared to argue his case based upon his motion and Respondents' Response. But when he walked into that courtroom, he was caught completely unprepared because Respondents never fully responded to Haunreiter's Motion for Injunctive Relief. (CP 80, l. 1, 9, 18; CP 90, l. 13-CP 93, l. 11; CP 102, l. 8-13; CP 105, l. 1-10; CP 106, l. 20-CP107, l. 11; CP 118, l. 19-CP 119, l. 9; CP 120, l. 7-16; CP 121, l. 16-CP 122, l. 1; CP 122, l. 13-17; CP 123, l. 3-18; CP 124, l. 11-CP

125, l. 9; CP 126, l. 1-12, l. 19-CP 127, l. 6; CP 128, l. 1-10; CP 131, l. 20-CP 132, l. 2, 18-CP 133, l. 9; CP 134, l. 1-2; CP 135, l. 1-CP 137, l. 2; CP 138, l. 1-6; CP 139, l. 3-4; RP 8, l. 14-15; RP 10, l. 21-23; RP 11, l. 1-8; RP 18, l. 6-15, 23-25; RP 20, l. 7-15)

When Haunreiter filed his Motion for Injunctive Relief, he was found in violation of CR 11. (RP 142; CP 142, l. 25)

IV. SUMMARY OF ARGUMENT

1. Haunreiter should not have been found in violation of CR 11 because his motion was (1) well grounded in fact; (2) it was warranted by existing law or a good faith argument for the extension, modification, or reversal of existing

law or the establishment of new law; (3) it was not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.

2. The trial court had no authority to order that sanctions must be paid to Respondent's attorney prior to filing for any further affirmative relief.
3. The trial court could have fashioned some sort of equitable relief when the clock ran out before this case was fully litigated and Haunreiter lost his bid for re-election as a PCO.
4. Given that a PCO has the duty to vote on motions, resolutions, elections and any other party business performed at Central Committee meetings, those motions, resolutions, elections and any other party

business performed at Central Committee meetings are not binding when Haunreiter was unconstitutionally banned from attending those Central Committee meetings.

5. When the Charter of the Democratic Party of the State of Washington and the Lewis County Democrat Central Committee Bylaws clearly state in effect that “All Lewis County residents who are registered voters and declare themselves affiliated with the Democrat Party are considered to be members of the Lewis County Democrat Party,” it was not proper for the trial court to deny Haunreiter’s request to be allowed to attend the Lewis County Democrat Central Committee meetings after he lost his bid for re-election as a

PCO.

6. Haunreiter argued that as a politician, he needed to keep up to date on issues and candidates.

Therefore, it was not proper for the trial court to find that there was no showing of immediate and irreparable injury, loss, or damage.

7. It was not proper for the trial court to decide that the Executive Board of the Lewis County Democrat Central Committee had authority to ban Haunreiter from Central Committee meetings in violation of state law, the Charter of the Democratic Party of the State of Washington, the Bylaws of the Democratic Party of the State of Washington, and the Lewis County Democrat Central Committee Bylaws.

8. It was not proper for the trial court to find that the Lewis County Democrat Central Committee is a private organization as it pertained to Haunreiter in violation of state law, the Charter of the Democratic Party of the State of Washington, the Bylaws of the Democratic Party of the State of Washington, and the Lewis County Democrat Central Committee Bylaws.
9. It was not proper for the trial court to rule that the issues Haunreiter raised in his Motion for Injunctive Relief had to wait until trial.
10. It was not proper for the trial court to find that Respondents did not have to fully respond to Haunreiter's Motion for Injunctive Relief until trial.

V. ARGUMENT

Former Supreme Court justice Richard Sanders admitted that when the Appellate Court receives a case from a Pro Se litigant, they automatically throw it out. Haunreiter did search desperately for an attorney to represent him but they all thought this is too mysterious of a case. They had never heard of such a thing. First, it is politics. Then they had never heard of being locked out of a political meeting. It was just too mysterious. So Haunreiter is doing the best he can on his own. Haunreiter hopes this Court will make its decision based upon the merits.

1. Haunreiter should not have been found in violation of CR 11.

In the Respondents' Response to Plaintiff's Motion for Injunctive Relief, they argued that CR 11 sanctions should be imposed but gave no reason why. (CP 70, l. 1-12) Haunreiter thought it was because he didn't sign his affidavit. (CP 66, l. 24-25; RP 2, l. 9-22) So Haunreiter explained that he did comply with CR 11 in his Reply to Response to Plaintiff's Motion for Injunctive Relief. (CP 71-CP 72, l. 18)

It was not until Haunreiter got into court that he found out that he was accused of violating CR 11 because his motion was not well grounded in fact and done for the purpose of delay. (RP 19, l. 8-9; l. 18-20) Haunreiter pointed out that Respondents never brought any of that up in their Response and he would like an opportunity

to brief it. (RP 18, l. 6-14; RP 18, l. 23-25; RP 20, l. 7-15; CP 133, l. 19-CP 134, l. 2;) Haunreiter told the trial court that he thought he was being ambushed (RP 20, l. 13-15) and that he could have answered in his Reply. (RP 18, l. 23) Haunreiter did address being ambushed in his Motion for Reconsideration. (CP 107, l. 13-CP 109, l. 16; CP 133, l. 11-17; CP 138, l. 16-17)

In fact, it was the trial court judge who argued the case for CR 11 sanctions for Respondents. (RP 3, l. 21-RP 4, l. 4; RP 12, l. 2-RP 13, l. 1; RP 15, l. 11-RP 16, l. 4; RP 18, l. 1-RP 19, l. 9; RP 20, l. 19-22)

The Order on Plaintiff's Motion for Injunctive Relief and Other Remedies and Imposing CR 11 Sanctions

added that Haunreiter's motion was not warranted by existing law. (CP 143, l. 1)

Since Respondents never explained specifically why they thought Haunreiter should be held in violation of Civil Rule 11 in their Response, Haunreiter argued that he did comply with CR 11 in his Motion for Reconsideration. (CP 87, l. 8-CP 111, l. 9)

The trial court ruled that Haunreiter did not meet the elements needed to satisfy an injunction under the statute. (RP 3, l. 21-RP 4, l. 15; RP 16, l. 2-4; RP 17, l. 24-25; RP 19, l. 6-7)

RCW 7.40.020 provides in part that an injunction may

be granted to restrain such act or proceedings when during the litigation, it appears that the defendant is doing some act in violation of the plaintiff's rights respecting the subject of the action tending to render the judgment ineffectual.

Haunreiter's argument was that he is a very active politician and that those Central Committee meetings were held for a reason and he should be allowed to attend those meetings to keep up to date about issues and candidates. (CP 119, l. 11-19; CP 129, l. 20-CP 130, l. 11)

First, Haunreiter argued in his Motion that he was being denied his constitutional rights and Respondents

violated the laws of the state of Washington. (CP 20, l. 1-20)

Since Respondents did not argue RCW 7.40.020 in their Response, Haunreiter pointed out how RCW 7.40.020 applied to his case in his Motion for Reconsideration. (CP 119, l. 11-19; CP 129, l. 1-CP 130, l. 11; CP 141, l. 16-CP 142, l. 5) Haunreiter also argued that he did not have to suffer irreparable harm. (CP 137, l. 4-15)

2. Respondents cited no authority that sanctions must be paid to Respondent's attorney before Haunreiter could file any further affirmative relief.

Respondents requested that Haunreiter not be allowed to file anymore motions until he pays the CR 11 sanctions. (RP 19, l. 10-CP 20, l. 6) Haunreiter argued that sanctions were not necessary. (RP 11, l. 9-18; CP 126, l. 14-17; CP 134, l. 4-CP 135, l. 17) Respondents cited no authority for ordering that he not be allowed to file anymore motions until he paid the sanctions.

3. Relief could have been granted without waiting for trial or summary judgment.

The issues Haunreiter raised in his Motion for Injunctive Relief did not need to wait for a trial or summary judgment. (CP 117, l. 8- CP 119, l. 9; CP 120, l. 7-16; CP 122, l. 13-CP 123, l. 18; CP 124, l. 11-17; CP 132, l. 15-CP 133, l. 3; CP 135, l. 1-CP 137, l. 2; CP

138, l. 1) Even if the issues Haunreiter raised in his Motion for Injunctive Relief should wait until trial or summary judgment, that is not grounds for CR 11 sanctions.

Haunreiter replied to the issues raised in Respondents' Response to Motion for Injunctive Relief. First, Haunreiter addressed the violation of CR 11 as much as he could from Respondents's Response. (CP 71-CP 72, l. 18) But when he got into court, he found out that they meant something entirely different, as explained above. The court should have given Haunreiter an opportunity to brief that, since it was not adequately raised in Respondent's response.

Haunreiter requested the trial court to find that the Lewis County Democrat Central Committee had no authority to lock him out of the Central Committee meetings in his Complaint (CP 3, l. 26-CP 4, l. 11; CP 17, l. 18; CP 18, l. 3-4) and in his Motion (CP 46, l. 6-9) and in his Reply (CP 73, l. 1-CP 75, l. 19) and in his Motion for Reconsideration (CP 102, l. 4-CP 107, l. 11; CP 117, l. 8-11; CP 127, l. 8-17; CP 138, l. 3-6) and at the hearing held on January 27, 2017. (RP 3, l. 1-20; RP 5, l. 1-2; RP 16, l. 5-15; RP 20, l. 23-RP 21, l. 3)

Respondents never responded to any of those allegations. They did not have to wait for trial or summary judgment. (CP 137, l. 11-15)

4. The Lewis County Democrat Central Committee

is not a private organization.

Haunreiter argued that the Lewis County Democrat Central Committee is not a private organization as it pertains to him. The Central Committee is a private organization when it comes to reprimanding an unruly tea partier but Haunreiter is a well-known life-long Democrat in Lewis County. His letters to the editor alone prove that. (CP 49-65) So it was not like he was an intruder to the Democrat Central Committee meetings. As pointed out above, Respondents had no authority to ban him from attending the Central Committee meetings either while he was a PCO or after he lost his bid for re-election. In addition to his cites to the record above, Haunreiter also argued that the Central Committee is not a private organization in his

Reply (CP 73, l. 10-CP 79, l. 18) and at the hearing held on January 27, 2017 (RP 9, l. 4-19; RP 15, l. 2- 10) and in his Motion for Reconsideration (CP 130, l. 16-CP 131, l. 10; CP 132, l. 6-13).

It is Haunreiter's argument that the courts do not want to get involved in telling a political party, such as the Democrat party or the Republican party, how to run their organizations. The courts do not want to tell a political party what they can put in their charter or bylaws as long as it is not discriminatory or violates state law.

The Washington state Democrat party is governed by state law, the Charter of the Democratic Party of the

State of Washington, the Bylaws of the Democratic Party of the State of Washington, and the Lewis County Democrat Central Committee Bylaws. There is no sense having any of those rules if the Respondents are not required to abide by them. Otherwise, the Lewis county Democrat Central Committee is a law unto itself.

Haunreiter argued that the Lewis County Democrat Central Committee had a long history of retaliating against him for exercising his First Amendment right to freedom of speech in his Complaint (CP 3, l. 20-CP 16, l. 3) and in his Motion for Injunctive Relief (CP 7, l. 20-CP 13, l. 3; CP 15, l. 1-CP 16, l. 3; CP 23, l. 4-CP 30, l. 11; CP 45, l. 8-13) and in his Reply (CP 76, l. 6-CP 7, l. 4) and in his Motion for Reconsideration (CP

94, l. 18-19; CP 120, l. 13-CP 122, l. 1). Respondents never responded to any of those allegations. They did not have to wait for trial or summary judgment. (CP 137, l. 11-15)

Next, Haunreiter argued that by retaliating against him for exercising his First Amendment rights to free speech, they violated the United States Constitution and the Washington State Constitution (CP 20, l. 1-7; CP 30, l. 13-CP 34, l. 18) Respondents never responded to those allegations. They did not have to wait for trial or summary judgment. (CP 137, l. 11-15)

At the time Respondents locked Haunreiter out of the Central Committee meetings, he was a PCO. (CP 4, l.

15-16) Haunreiter argued that Respondents violated his First and Fourteenth Amendment rights of free speech.

(CP 35, l. 1-CP 36, l. 13) Respondents never responded to those allegations. They did not have to wait for trial or summary judgment. (CP 137, l. 11-15)

Next, Haunreiter argued that by locking him out of the Central Committee meetings, Respondents violated his due process rights of free speech under the Fourteenth Amendment to the United States Constitution. (CP 16, l. 15-19; CP 36, l. 15-CP 38, l. 9) Respondents never responded to those allegations. They did not have to wait for trial of summary judgment. (CP 137, l. 11-15)

The trial court ruled that Respondents did have the

authority to lock him out of the Central Committee meetings based solely upon RCW 29A.80. (CP 141, l. 25; RP 13, l. 18-CP 14, l. 13; CP 132, l. 6-13)

In fact, it was the trial court judge who argued RCW 29A.080 for Respondents. (RP 13, l. 18-RP 14, l. 14; RP 16, l. 16-20)

The trial court ignored the fact that Respondents made their own rules through the Bylaws of the Lewis County Democrat Central Committee and violated those rules. (CP 20, l. 8-11)

The trial court ignored RCW 29A.80.030, which provides in part that “county central committee of each

major political party consists of the precinct committee officers of the party.” Haunreiter was an elected precinct committee officer when he was locked out of the Central Committee meetings. (CP 38, l. 14-CP 39, l. 1; CP 74, l. 3-10; CP 130, l. 13-14) The Respondents never addressed those allegations. (CP 125, l. 5-9; CP 138, l. 8-11) They did not need to wait for trial or summary judgment. (CP 137, l. 11-15)

The trial court ignored RCW 29A.80.041, which provides that “the precinct committee officer shall serve so long as the committee officer remains an eligible voter in that precinct.” When Haunreiter was locked out of the Central Committee meetings, he was still an eligible voter in his precinct. (CP 39, l. 2-5; CP 74, l.

12-16) The Respondents never addressed those allegations. They did not need to wait for trial or summary judgment. (CP 137, l. 11-15)

The trial court ignored RCW 29A.80.051, which provides that “The term of office of precinct committee officer is two years, commencing the first day of December following the primary.” (CP 39, l. 6-9; CP 74, l. 18) The Respondents never addressed those allegations. They did not need to wait for trial or summary judgment. (CP 137, l. 11-15)

The trial court ignored RCW 29A.56.110, which provides a method of recalling any elective public officer of the state or of such political subdivision, as

the case may be, under the provisions of sections 33 and 34 of Article 1 of the Washinton Constitution. (CP 39, l. 11-15; CP 75, l. 4) The Respondents never addressed those allegations. They did not need to wait for trial or summary judgment. (CP 137, l. 11-15)

The trial court ignored the fact that Respondents were not acting under the Charter of the Democratic Party of the State of Washington, the Bylaws of the Democratic Party of the State of Washington, or the Lewis County Democrat Central Committee Bylaws. (CP 39, l. 17-CP 45, l. 4; CP 45, l. 14-19; CP 75, l. 15-19) The Respondents never addressed those allegations. They did not need to wait for trial or summary judgment. (CP 137, l. 11-15)

It is Haunreiter's belief that if the Respondents had addressed those issues in their Response, there would be no need for trial or at the very least, narrow the issues before trial. (CP 77, l. 14-CP 78, l. 8; CP 126, l. 8-12; CP 126, l. 19-CP 127, l. 19-CP 127, l. 6; CP 139, l. 3-4)

5. Haunreiter's request for declaratory relief could have been granted by motion if the Respondents had fully responded to his motion.

In his Motion for Injunctive Relief, Haunreiter requested appropriate declaratory relief regarding the unlawful and unconstitutional acts and practices of Respondents. (CP 46, l. 10-11; CP 47, l. 14-17) That

was based upon the fact that by locking him out of the Central Committee meetings, that effectively nullified his election as a PCO. (CP 17, l. 1-12; CP 20, l. 15-20; CP 30, l. 7-10; CP 35, l. 15-17; CP 76, l. 1-4; CP 78, l. 12-14) Respondents seem to think that by locking Haunreiter out of the Central Committee meetings and then running out the clock in court, there should be no consequences. (CP 81, l. 7-11; CP 99, l. 8-13; CP 113, l. 4-10; CP138, l. 19-CP 139, l. 1)

6. Haunreiter's request for equitable relief could have been granted by motion because he did show immediate and irreparable injury, loss, or damage would occur and that there were other laws than RCW 29A.080.

Once again, Respondents did not make that argument in their Response to Plaintiff's Motion for Injunctive Relief. Haunreiter argued above that there was a showing of immediate and irreparable injury, loss, or damage because as a politician, he needed to keep up to date on issues and candidates. (CP 119, l. 11-19; CP 129, l. 1-CP 130, l. 11; CP 137, l. 4-17) For the same reasons, Haunreiter argued that he should be allowed to attend the Central Committee meetings even after he lost his bid for re-election.

Furthermore, Haunreiter argued that equitable relief was proper. (CP 111, l. 11- CP 113, l. 10; CP 138, l. 19-CP 139, l. 1; RP 12, l. 11-14)

7. The trial court could have fashioned some sort of equitable relief, since the clock ran out before this case was fully litigated.

In his Motion for Injunctive Relief, Haunreiter requested that since his term as PCO ended before this case was fully adjudicated, that he be allowed to be a co-PCO for every month he was unconstitutionally banned from attending the Central Committee meetings. (CP 47, l. 10-13; RP 10, l. 4-9) Haunreiter explained more fully in his Reply to Response to Plaintiff's Motion for Injunctive. (CP 81, l. 5- CP 82, l. 2) Haunreiter was asking the court to fashion an equitable remedy because Respondents had nullified his election as a PCO. (CP 94, l. 1-4; CP 97, l. 1-CP 98, l. 10; CP

99, l. 15-19; CP 111, l. 11-CP 117, l. 4; CP 120, l. 1-5;
CP 122, l. 3-11)

8. All actions of the Lewis County Democrat Central Committee should be declared null and void during the time while he was a PCO and not allowed to attend the Central Committee meetings.

Haunreiter argued that by being unconstitutionally locked out of the Central Committee meetings while he was a PCO, his election was effectively nullified. (CP 20, l. 15-20; RP 4, l. 16-25) Hauneiter argued that he should have been allowed to vote on issues, policies, resolutions and officers. (CP 35, l. 15-17)

Haunreiter requested the trial court to nullify any actions taken by the Democrat Central Committee, since he was unconstitutionally locked out of the Democrat Central Committee meetings. (CP 18, l. 6-8; CP 11, l. 14-17; CP 81, l. 14-CP 82, l. 10; CP 125, l. 11-19; RP 10, l. 17-RP 11, l. 8)

9. Haunreiter should be allowed to attend the Central Committee meetings even after he lost his bid for re-election.

Haunreiter asked the trial court to allow him to attend the Central Committee meetings even after he lost his bid for re-election in his Motion (CP 22, l. 2-6, 10-14; CP 24, l. 4-9; CP 47, l. 8-9) and in his Reply (CP 82, l. 18-19) and in his Motion for Reconsideration (CP 97, l.

1-CP 98, l. 14; CP 128, l. 1-10; CP 129, l. 10-18) and at the hearing on January 27, 2017 (RP 13, l. 2-17).

VI. Conclusion

First, Haunreiter is asking this Court to find that he was not in violation of CR 11.

Second, Haunreiter is asking this Court to remand this case back to the trial court so Respondents can fully respond to his Motion for Injunctive Relief. If Respondents were ordered to fully respond to Haunreiter's motion, that would at least narrow the issues if a trial became necessary after that.

Third, Haunreiter is asking this Court to find that the Lewis County Democrat Central Committee is not a

private organization as it pertains to Haunreiter, a lifelong Lewis County Democrat.

Fourth, Haunreiter is asking this Court to remand this case back to the trial court so it could fashion some sort of equitable relief, since the clock ran out before this case could be fully litigated and Haunreiter lost his bid for re-election.

Fifth, Haunreiter is asking this Court to decide if party business of the Central Committee should be declared null and void, since by unconstitutionally locking Haunreiter out of the Central Committee meetings nullified his election as a PCO.

Sixth, Haunreiter is asking this Court to decide that Haunreiter should be allowed to attend Central Committee meetings even if he is not a PCO.

Respectfully submitted this 3rd day of July, 2017.

Chuck Haunreiter

Chuck Haunreiter

Appellant, Pro Se

