

1 perceived by the members of the Credentials Committee as being in favor of electing non-
2 incumbent officers and directors at the upcoming corporate election.

3 34. Plaintiff LEFEVER was notified by members of the Credentials Committee that
4 he was not permitted to vote as a delegate, despite the fact that LEFEVER had complied with all
5 Bylaw provisions. LEFEVER is not a resident of the geographical boundaries of his local
6 Republican Assembly, Glendora Republican Assembly, and publicly supported the election of
7 non-incumbent officers and directors at the upcoming election.

8 35. Plaintiffs are informed, believe, and thereupon allege that the CRA Credentials
9 Committee submitted a report, that report excluded names of qualified delegates, and denied
10 members entitled to vote, under the provisions of the Bylaws, a right to vote in the corporate
11 election.

12 36. Plaintiffs are informed, believe, and thereupon allege that the Residency of
13 Delegates Bylaw amendment was removed from the agenda following the Credentials
14 Committee report.

15 37. Plaintiffs are informed, believe, and thereupon allege that on or about April 16,
16 2011, an election of CRA corporate directors and officer was held at the Annual Convention.

17 38. Plaintiffs are informed, believe, and thereupon allege that members of the CRA
18 were inappropriately denied the right to participate and vote in the election of CRA corporate
19 directors and officers.

20 39. Plaintiffs are informed, believe, and thereupon allege that, consistent with efforts
21 to rig the outcome of the election of corporate officers and directors by denying otherwise
22 qualified electors the right to vote in the election, the incumbent officers, including Celeste
23 Greig, were re-elected by a relatively slim margin.

24 40. Plaintiff VOIGTS, who was standing for re-election, was defeated. Plaintiff
25 VOIGTS is informed, believes, and thereupon alleges that, because delegates who were publicly
26 committed to voting for him were not seated by the Credentials Committee, the efforts to rig the
27 outcome of the election resulted in his defeat insofar as his delegates were denied their right to
28 vote.

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FIRST CAUSE OF ACTION:
DECLARATORY RELIEF

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3 41. Plaintiffs reallege and incorporate herein by this reference as though fully set
4 forth herein, each and every allegation set forth in Paragraphs 1 through 40 of this complaint.

5 42. Plaintiffs, and each of them, contend as follows:

6 a. Defendant, in contravention of its Bylaws, refused to seat more than 60 qualified
7 delegates duly and lawfully selected by local Republican Assembly organizations
8 and entitled to vote at the 2011 Annual Convention in violation of the
9 Corporations Code;

10 b. A corporate election was conducted where qualified delegates entitled to vote
11 were wrongfully excluded by Defendant CRA from voting in the annual election
12 of corporate officers and directors in violation of Corporations Code, § 7150,
13 subdivision (a)(1); and,

14 c. As a result, the outcome of the election of officers and directors at the 2011
15 Annual Convention was unlawful and void under Corporations Code, § 7150,
16 subdivision (a)(1).

17 43. Plaintiffs are informed, believe, and thereupon allege that Defendants, and each of
18 them, contend as follows:

19 a. Defendants properly refused to seat more than 60 qualified delegates duly and
20 lawfully selected by local Republican Assembly organizations and entitled to vote
21 at the 2011 Annual Convention in violation of the Corporations Code;

22 b. The corporate election was lawfully conducted; and,

23 c. As a result, the outcome of the election of officers and directors at the 2011
24 Annual Convention was lawful and valid.

25 44. An actual controversy relating to the legal rights and duties of the respective
26 parties has arisen requiring a declaration of rights or duties to be made by this court pursuant to
27 Code of Civil Procedure § 1060 and Corporations Code § 7616.

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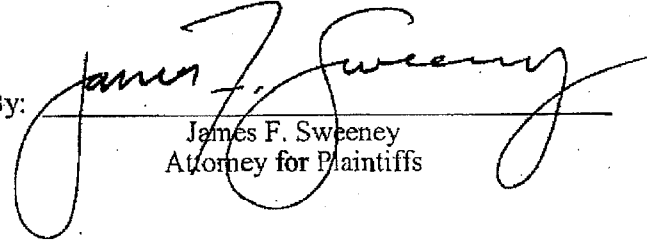
2. That the court permanently enjoins CRA and DOES 1 through 10 from certifying the results of the election conducted at the Annual Convention April 15-17, 2011 and orders Defendant CRA to conduct a new election for officers in accordance with the provisions of its Bylaws, as amended prior to April 15, 2011.

3. For such other relief as this court may deem just and proper.

DATED: April 27, 2011

SWEENEY & GREENE LLP

By:



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