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July 18, 2019

***VIA ELECTRONIC MAIL, HAND  
DELIVERY, AND CERTIFIED  
MAIL – RETURN RECEIPT  
REQUESTED***

Honorable Mac Warner, West Virginia Secretary of State  
ATTENTION: Elections Division  
1900 Kanawha Boulevard East, 1st Floor  
Charleston, WV 25305

**RE: Notice of Pending Claim for Relief Under W. Va. Code § 55-17-3**

Dear Mr. Secretary of State:

I write to satisfy the thirty-day notice of pending claim against the State of West Virginia as described in West Virginia Code § 55-17-3 by the following individuals: Thomas Collins, Cross Lanes, WV; Rich Greathouse, Clendenin, WV; Barbara Hackworth, Cedar Grove, WV; Candace Joseph, Charleston, WV; Frank Larese, Belle, WV; Bree Lemmon, Cross Lanes, WV; and Nancy McClanahan, Charleston, WV.

The claims against the Secretary of State, acting in his capacity as Chief Elections Officer, are related to recent events in Kanawha County which have culminated in the removal of duly elected and appointed members of the Kanawha County Republican Executive Committee through inaccurate bases and by improper means. In so doing, the Kanawha County Republican Executive Committee through Chairwoman, Tresa Howell, has violated sections of Chapter 3 of the West Virginia Code, West Virginia Code § 6-6-7, and the published by-laws of the Kanawha County Republican Executive Committee.

The aforementioned seek relief, including but not limited to, a writ of prohibition against the WVSOS to preclude the publishing or honoring of the roster submitted by the Kanawha County Republican Executive Committee on July 9, 2019. And the aforementioned, generally, reserve the right to seek any further relief appropriate for themselves, for the other wrongfully removed members, and for those whose voting rights have been infringed by the

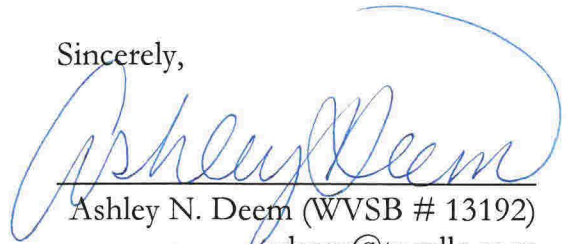
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Honorable Mac Warner, West Virginia Secretary of State  
July 18, 2019  
Page 2

actions of Chairwoman Tresa Howell and the Kanawha County Republican Executive Committee.

Pursuant to § 55-17-3(a)(1), the aforementioned reserve the right to seek injunctive relief as may be necessary prior to the thirty-day threshold if it is determined that irreparable harm would occur due to the otherwise mandatory delay of the institution of the corresponding action.

Sincerely,



Ashley N. Deem (WVSB # 13192)

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COUNSEL FOR THE

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cc: Attorney General Patrick Morrissey