

Law Offices of Craig P. Alexander

24681 La Plaza, Suite 250

Dana Point, CA 92629

Office: 949-481-6400 Facsimile: 949-242-2545

E-mail: cpalexander@cox.net

SENT VIA ELECTRONIC MAIL (GPARKIR@YAHOO.COM) FACSIMILE (916-244-0167) AND U.S. MAIL

July 6, 2015

Mr. George Park
401 Bremerton Ct
Roseville, CA 95661

RE: Demand to Complete Transfer of CRA Property / Records

Dear Mr. Park,

On June 1, 2015 I sent you, on behalf of the California Republican Assembly, a letter advising you that CRA expected you to turn over CRA's property (in the form of CRA's membership records) no later than June 29, 2015. We asked you to send those records to Mr. Carl Brickey.

Mr. Brickey reports that on the evening of Saturday, June 27, 2015, he received a USPS Priority Mail Box from you that contained the following items and were missing items including those mentioned below:

1. A printed copy of our statewide membership roster. The roster is printed on copy proof security paper in size 6 font (very small) and appears to be at least six months out of date. Furthermore, all but four members of the Placer County RA are missing from the membership roster.
2. 36 local unit folders. 34 folders contain only the unit's bylaws with less than half containing unit maps. Two unit folders (Stanislaus County and Westminster) are empty. I am advised that although you had been provided their current unit bylaws, the bylaws for two of the units (Nevada County and Sacramento) are outdated versions. With the exception of three units (Cosumnes, Nevada County and Newport Beach) the bylaws and maps are printed on copy proof security paper. The folders for the Yolo and Sutter-Yuba units were empty with no list of members or any other information. Lastly, the folders for several inactive but still chartered units such as Contra Costa and Palos Verdes Peninsula are missing.
3. A folder containing membership applications, membership submission forms and copies of dues check dated from after 2015 CRA Convention.
4. Copies of deposit slips and dues checks dated prior to and immediately after the 2015 CRA Convention.

I know you are aware of these deficiencies from this June 27th delivery as Mr. Brickey has already contacted you about it. Mr. Brickey reports that you have not responded to his e-mail to you. He has also not received any further records from you.

You did not deliver any of CRA's records in electronic format even though you obviously have them in that format as you kept them in your computer and you had access to the Hightail account that you canceled without consultation with CRA President Tom Hudson. Further, you needed that document in electronic format to print what you did send to Carl Brickey in 6 point font on security paper.

The latter point - printing the materials on security paper in 6 point font, is particularly disturbing. No one keeps electronic formatted materials in 6 point font. No one prints documents on security paper and in 6 point font unless one wishes to make it extraordinarily difficult for the recipient to read copy and use the materials received. As the former CRA Membership Secretary you have particular knowledge of the needs of the Membership Secretary to use this information including being able to copy it, to use it in electronic format, etc. to properly perform those functions.

The only logical conclusion to draw from this is that it was an **intentional act made in bad faith** to harass both Mr. Brickey and CRA and effectively deny CRA its complete records. CRA considers the delivery you made to Mr. Brickey on June 27, 2015 to be non-compliant with your obligations under the law and as a former CRA officer.

As you know from the e-mails I recently had with your brother, he has stated that he has provided me with all of the CRA records he possessed on his laptop - he sent them to me in electronic formats. In addition, although I copied you on all of the recent e-mails I had with Aaron Park, you have not responded to any of them or delivered any documents to me either. Therefore this letter and demand is addressed solely to you.

CRA makes this final request and demand to you. **Deliver ALL of CRA's records to Mr. Carl Brickey (4704 Cleary Circle, Elk Grove, CA 95757; 916-806-3015; cbrickey@live.com) no later than Noon, Monday, July 13, 2015.**

By all records I mean all of CRA's records in electronic and paper formats - whatever manner they are kept in. You kept those records in Excel format, Word format, PDF format and paper format. You had records of CRA units that are currently active and of units that are not active. All of the records that Peggy Mew turned over to CRA in 2011 were in your possession, custody and control. CRA expects all of those records: paper formatted records, electronically formatted records and any other formats you might possess of CRA units including all records regarding past and presently active units to be delivered to Mr. Brickey no later than Noon, Monday, July 13, 2015. I should note that by ALL I include even records of units you may have held the opinion were "fake" units - that is a matter CRA will deal with and we ask you to not substitute your judgment about that. **In short, ALL means ALL of the records in whatever format they are in.**

If you fail to deliver the records by Noon, Monday, July 13, 2015, CRA will have no choice but to conclude that you are refusing to comply with your responsibilities. CRA reserves all of its legal rights in this matter.

Very truly yours,



Craig P. Alexander

cc: Tom Hudson, Esq., President, California Republican Assembly
Carl Brickey, Membership Secretary, CRA