

Richard A. Westfall | Partner

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June 9, 2015

**By E-Mail: [steve@cologop.org](mailto:steve@cologop.org); [seh2016@gmail.com](mailto:seh2016@gmail.com)**

Mr. Steve House  
Chairman  
Colorado Republican Party  
5950 S. Willow Drive, Ste. 210  
Greenwood Village, CO 80111

Re: Discontinuance of Representation of Colorado Republican Party by Hale Westfall, LLP

Dear Mr. Chairman:

I respectfully inform you that Hale Westfall, LLP, will discontinue its representation of the Party effective immediately, subject to any necessary work to transition existing matters to other counsel. In that regard, Hale Westfall has provided work on and/or is aware of the following legal matters:

1. Matter before the Colorado Court of Appeals: 2014CA1945, Colorado Republican Party v. Wayne W. Williams, in his official capacity as Colorado Secretary of State and Colorado Ethics Watch, Defendant-Appellant, on appeal from 2014CV031851, Colorado Republican Party v. Scott Gessler, in his capacity as Colorado Secretary of State and Colorado Ethics Watch, Intervenor. Per your emails to me last Friday, the matter has already been transferred to Chris Murray of Brownstein Hyatt Farber Schreck, LLP, and he entered an appearance in this matter today.

2. Matter before the Federal Election Commission: MUR 6925. Florence Sebern Complaint against the Colorado Republican Party, the First Congressional District Republican Central Committee, and against certain former party committee officers and representatives. We responded on behalf of the Party and a number of the individual respondents. We are not sure if there will be additional legal work required in this matter, but we will be happy to work with new counsel and let them know what we learned in preparing our initial response.

3. Matter before the Federal Election Commission: Post-election audit of the presidential election cycle period of January 1, 2011 through December 31, 2012.

4. Compliance with settlement agreement resolving campaign complaints filed by Matt Arnold and Campaign Integrity Watchdog against the Colorado Republican Party and certain of its donors, OS2014-0044 to 0052 and consolidated complaints under OS2015-0001.

5. Enforcement of judgment granted for plaintiffs in matter before the El Paso County District Court concerning spurious liens filed against the Colorado Republican Party, the

El Paso County Republican Party, and certain political party officers and Republican candidates: 13CV32319, Ryan R. Call, et al v. Jaxine Bubis.

6. General representation, legal counsel, parliamentary assistance and advice to the Colorado Republican Party and to its affiliated officers, county and district political party committees, elected officials, candidates, and allied party groups or organizations. This ongoing work involves providing assistance and advice to ensure compliance with all applicable federal, state and local laws, including but not limited to compliance with federal and state election laws, laws governing nonprofit associations, campaign finance regulations and reporting requirements, VRD registration, applicable federal and state tax law, prior court orders and consent decrees, registration and defense of trademarks and trade names, compliance with contractual obligations and agreements, and compliance with the governing bylaws and rules of the Republican Party.

7. Representation of the Colorado Republican Party or its interests before the Colorado Secretary of State, before the Colorado General Assembly, before the Federal Election Commission, or on or before any state or local administrative agency, board, commission or advisory committee. The Secretary of State has just completed a rulemaking and the General Assembly is no longer in session. Regarding matters before the FEC, we are only aware of the post-election audit and the *Seburn* complaint.

8. Negotiation of the terms of a memorandum of understanding with CNBC and assistance in connection with the third sanctioned Republican Presidential Primary Debate in October 2015 as authorized by the Republican National Committee on January 16, 2015.

9. Revisions to the bylaws of the Colorado Republican Party and development of delegate selection rules and instructive materials required as a result of recent changes to the national Rules of the Republican Party, required to be adopted and submitted to the Republican National Committee no later than October 1, 2015 in accordance with RNC Rule No. 16 (d) and (f).

10. Representation, legal advice and assistance in connection with the 2016 Colorado precinct caucuses, county and district assemblies, and the 2016 Colorado Republican State Assembly and Convention.

Please contact us if you have any questions about any of these matters. We will be happy to assist you in making any necessary transitions. Best of luck to you and the Party.

Sincerely,



Richard A. Westfall  
Hale Westfall, LLP