



O'AHU COUNTY COMMITTEE

Investigation Committee Report Complaint for Misuse of Party Funds

October 13, 2017

Complaint Received: 08/25/2017 (attached)

Accused Member's Response Received: 09/28/2017 (attached)

Allegations

Complainant alleges the accused member, HD 23 chair, misused Party funds to promote interests antithetical to Party interests.

Complainant also alleges accused member violated DPH Bylaws Article III, Section 2 by holding a District Council meeting without sufficient notice.

On the Misuse of Funds

In question are funds designated for the Party's Summer of Resistance Drive, which was used to pay for a meeting held in HD 23 on August 26, 2017.

The Complainant offers as evidence a meeting notice sent on August 21, and another on August 22, that emphasized the special session would be on the agenda. The Party email system was used for August 22 email and sent to 723 members of HD 23

State Party Chair Vandever immediately became aware and notified the defendant that the topic of the meeting needed to be the Resistance Drive since that's what the funds were designated for. He also said he would be attending the meeting.

On August 23, the accused member sent a corrected email to all members of her district that the Summer of Resistance Drive would be the topic of the August 26 meeting and the special session would not be a topic. This email also went to 723 members of HD 23.

On August 25, the Complainant filed this Complaint, one day *before* the meeting in question.

On August 26, the meeting was held and was run by Chair Vandever. The topic of the meeting was the Summer Resistance Drive, as confirmed by Chair Vandever.

Therefore, this committee concludes the funds were spent appropriately.

On the Violation of DPH Bylaws Article III, Section 2 – Five-Day Meeting Notification Rule

The Complainant also alleges that DPH Bylaws Article III, Section 2 was violated because the meeting notice on August 22 was not sent at least five days prior to the meeting.

DPH Bylaws Article III, Section 2 applies specifically to meetings of the District Council where deliberations may take place or decisions may be adopted for the District.

There is no evidence the intention of the meeting was a District Council meeting but instead District-wide informational meeting. No Council business took place at the August 26 meeting.

Other Assertions of the Complaint

Besides the main claim that the accused had misused funds, the complaint makes assertions that the accused acted improperly as Chair of District 23 and in other ways. Since these assertions were not formally claimed as violations, the Investigation Committee did not consider them in this investigation.

Conclusion

The funds in question went towards their designated purpose. They were not misused. Therefore, this committee concludes the accusation of misuse of Party funds is without merit.

The committee also concludes the five-day rule does not apply in this case so the accusation that DPH Bylaws Article III, Section 2 was violated is also without merit.

Therefore, it is the recommendation of this committee that this Complaint be dismissed.

Alan Burdick, Chair, Investigation Committee

Tambry Young

Richard Halverson

**LETTER OF COMPLAINT AGAINST MICHELE MATSUO,
DISTRICT COUNCIL CHAIR FOR HAWAII HOUSE DISTRICT 23**

This letter of complaint alleges that Michele Matsuo, District Council Chair for House District 23, misused Democratic Party funds and officer privileges, promoting interests antithetical to the Democratic Party of Hawai'i.

BACKGROUND

Ms. Michele Matsuo, District Council Chair for House District 23 was elected in March 2016 amidst high participation in her district owing to the Presidential Preference Poll. Since then, there have been no district meetings as of August 23, 2017, despite being requested to convene one in spring, by the O'ahu County Committee ("OCC") Vice Chair, Dylan P. Armstrong, in advance of the 2017 annual O'ahu County Convention. District Council Chair Matsuo was combative with both the County Vice Chair and then-County Chair Reena Rabago when asked to fulfill her duties. Ms. Matsuo claimed that she did not have time to hold a district meeting. She refused to allow two observers from House District 23 be registered as delegates with full participation privileges, and she refused assistance from the County Committee Vice Chair. Ms. Matsuo remained an obstacle for the duration of the Convention planning period. She verbally berated delegate Losalini Reeves, to the point of tears, until Ms. Reeves requested to avoid conflict by withdrawing as a delegate. House District 23 participation was middling given the number of registered Democrats in the district, and owed largely to outreach from the OCC, not Ms. Matsuo.

Since then, Ms. Matsuo has been combative to state party leadership and its Summer of Resistance Organizers, who are organizing meetings in those districts that have not met this year, including House District 23. Repeatedly, Ms. Matsuo has cited a lack of available time to contact members and hold a meeting.

On August 19, the State Central Committee ("SCC") of the Democratic Party of Hawai'i ("DPH") voted to amend the Platform in support of the Honolulu Rail Transit Project. Ms. Matsuo was granted special permission by DPH Chair Tim Vandever to address the SCC prior to the vote. She attempted to persuade the SCC against amending the Platform, unsuccessfully. Her comments can fairly be characterized as critical of rail or 'anti-rail.'

VIOLATIONS

On August 21 at 2:38 PM, Ms. Matsuo e-mailed non-residents that she would be holding a rail "mini-forum" at Manoa Elementary Cafeteria (Exhibit "A"), sending this to anti-rail activists who are neither Democrats nor district residents, such as Keli'i Akina, of the Grassroot Institute of Hawai'i, which receives funding from the Koch Brothers to promote a radical anti-worker agenda, Natalie Iwasa, and John Bond from the Ewa plains.

After 3 weeks of requests from Democratic Party of Hawai'i ("DPH") staff, Ms. Matsuo had agreed to convene a district meeting. She requested and received money from the on August 21 for the purposes of holding a District Council meeting from the DPH funds, which were provided by the Democratic National Committee and membership dues for the purposes of district meetings. A check for \$243.79 USD was given to Ms. Matsuo, which

she then used to reserve space in Manoa Elementary School cafeteria on Saturday, August 26. Ms Matsuo then e-mailed non-Democrats Kelii Akina, Natalie Iwasa, Libertarian Joe Kent, and District Council Vice Chair Dale Kobayashi, that she was convening an “informational meeting” on rail at Manoa Elementary (Exhibit “B”).

On August 22 at 1:16 pm, a full day after her e-mail to the anti-rail activists, Ms. Matsuo then noticed by e-mail party members as to the August 26th meeting (Exhibit “C”), short of the 5 days required by DPH bylaws (“bylaws”). Ms. Matsuo’s e-blast listed the purposes of the meeting as for rail first, and then secondly for district business. Some active Manoa Democrat(s) received no notice at all. Violation of the bylaws is clear:

“Section 2. Meeting Notices, Attendance at Meetings.

District Council meetings may be held at any time by call of the Chairperson or upon a written request submitted to the Secretary or Chairperson by not less than twenty-five (25) percent of the total membership of the District Council. Notice of the District Council meetings shall be given in person, by telephone, by facsimile, by electronic mail or by mailing such notice to the last known address of each member **not less than five (5) calendar days prior to the meeting.”**

DPH Chair Tim Vandever stated on August 22 that Ms. Matsuo did not inform him of her intention to hold a rail “mini-forum” or “informational meeting” when she requested party funds of the DPH (Exhibit “D”).

Ms. Matsuo’s misconduct constitutes abuse of power and misuse of party funds, as attempted theft:

- 1) She lied to the DPH about her intentions as to the use of party funds; and
- 2) She committed to using those funds to promote an agenda for the benefit of non-party members, one that is contrary to the Platform, and as such, is holistically contrary to the Party itself; and
- 3) She notified the biggest opponents of the DPH’s platform, as to her stated “informational meeting”, before she notified Democrats in good standing. Meanwhile, active District 23 Democrats were not notified of the meeting. Effectively, Ms. Matsuo rigged the composition of her district meeting, to ensure dominance by people like-minded as her on rail.

CONCLUSION

This dishonest and unethical behavior is a breach by Ms. Matsuo to fulfill her officer duties to her district. Ms. Matsuo should be stripped of her officer position. She should be 1) banned from holding an officer position for three years, or 2) expelled from the Party’s membership, pursuant to the bylaws of the DPH, as follows:

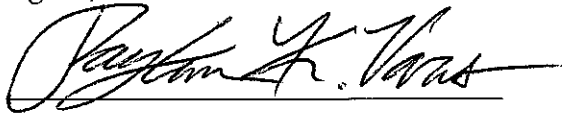
“Section 8. Expulsion, Reprimand, or Censure. (2) Permissive Expulsion, Reprimand and Censure. A member of the Democratic Party of Hawai’i may be expelled, reprimanded or censured for the following reasons:

- (a) Active support or promotion of a political party or any candidate(s) of a political party other than the Democratic Party. Examples of active support include, but are not limited to, making monetary or in kind contributions, accepting a position in an opposition campaign, signwaving, letter writing, appearance in campaign ads, resigning from the Democratic Party to support another political party and rejoining the Democratic Party.
- (b) Failure of a candidate for an elective office or an elected official to follow and abide by the Constitution of the Democratic Party of Hawai'i, and regulations of the Party campaign committees as approved by the State Central Committee or respective County Committee.
- (c) Failure to abide by the Constitution of the Democratic Party of Hawai'i and/or platform of the Party.
- (d) Violation of governmental ethics codes as adjudicated or determined by the State Ethics Commission, the County Ethics Commission, the Office of Disciplinary Counsel, the State House, the State Senate, or the courts."

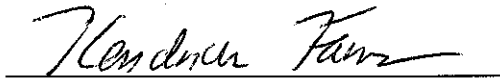
NOTES

We the complainants recognize that we must foster open discussion and debate in our party. This complaint does not set precedent that anti-rail sentiments are not permitted in the Party. Rather, we maintain that District Council officers must use party funds ethically, and for the purposes for which they were intended. District meetings must be conducted fairly, without favoritism, or stacking the meeting composition against active Democrats.

Signed,



RAYTAN VARES
PRESIDENT, YOUNG DEMOCRATS of HAWAII,
in his individual capacity.



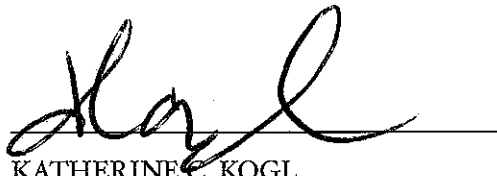
KENDRICK FARM
REGION 3 CHAIR, OAHU COUNTY DEMOCRATS,
in his individual capacity.

cc Chair Tim Vandever, Democratic Party of Hawai'i
Executive Director Laura Nevitt, Democratic Party of Hawai'i

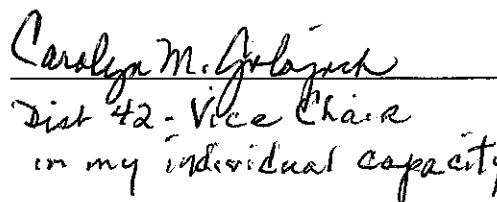
OCC_COMPLAINT_MATSUO_LETTER_08222017



DYLAN P. ARMSTRONG
VICE CHAIR, OAHU COUNTY DEMOCRATS,
in my individual capacity.



KATHERINE C. KOGL
REGION 2 CHAIR, OAHU COUNTY DEMOCRATS,
in her individual capacity.



Dist 42 - Vice Chair
in my individual capacity

EXHIBIT "A"



Dylan Armstrong <waiakekua@gmail.com>

From: michelematsuo@yahoo.com
To: cfrith@fbsmgt.com, drjlam@aol.com, ewabond@gmail.com, akina@grassrootinstitute.org, keakuaskahu777@yahoo.com, usfiveguys@gmail.com, burdick808@gmail.com, nataliah@hawaii.edu, richhalverson@gmail.com, htf3000@gmail.com
Sent: 8/21/2017 2:38:52 PM Hawaiian Standard Time
Subject: How to prepare for a Rail Special Session.

Aloha, all!

Although I talked to Sen. President Ron Kouchi last night at Safeway, he just shrugged to my question whether we would have a special session, and said, "We will find out next week." LOL

So, I decided to do some research. I spoke to the Public Access Room, the House Clerk's Office, and the Senate Clerk's Office. The Senate Clerk's Office had some good tips. The Special Session can be called by Proclamation of the Governor, not necessarily just by resolutions by the House and Senate.

We should check on the Capitol webpage, Recent Updates section, as often as we like to see if there has been an announcement or agreement regarding a Special Session. If you find such a notice, please let everyone (us) know ASAP ! Also, it is possible that we may have to submit testimony as early as Monday, if the Senate or House waives the normal notice requirements. We will celebrate later, if there is no Special Session, but for now, please be ready to charge in with testimony if a Special Session is called.

The Recent Updates section to check currently is a 4" x 2" box in the middle of the top of the webpage. This is where notice of a Special Session will appear:
<http://capitol.hawaii.gov/home.aspx>

The Senate Clerk's Office also recommended that we sign up for hearing notices from the Committees which held the Rail Info meeting last Monday. The Hearing Notices sign up feature is an Orange button just below the Recent Updates box.

We now have the video of the Rail Info briefing, accessible by the link below:

http://media-05.granicus.com:443/ondemand/olelo/olelo_91a9df48-6dce-4275-88c3-7f4ea1033af5

.mp4

This is the link for the written testimony from the Rail Info briefing:

http://www.capitol.hawaii.gov/CommitteeFiles/senate/TRE/TREfiles/INFO%20BRIEFING%20TESTIMONY%2008-14-17_Master.pdf

I also was told that the Senate is accepting testimony, but then was told that we would get the portal when the hearing notice was given. So, prepare, but hold in readiness?

We are looking to have a mini-forum on August 26th, 2-4 pm at Manoa School cafeteria, so please save the date and time, and stay tuned. Sorry for the late notice.

Aloha

Michele

PS:

BELOW IS REP ISAAC CHOY'S ADVICE ON THE PROPOSED RAIL SPECIAL SESSION:

With the upcoming Special Session, it is important to know the procedures we must follow and the possible outcome.

Special session is scheduled for Aug. 28 to Sept. 1, the minimum time required for all internal and constitutional deadlines. The speaker has intimated that there will be no extension of the special session. This could also be a practical decision since the FTA deadline is looming on September 15, 2017.

First, the bill will be introduced on Monday, pass first reading and be referred to a committee. Every word, and punctuation mark would have to be predetermined by this time and agreed to by House and Senate leadership. If the legislation is not agreed to by this time, the special session will be canceled. Please note that leadership has already had about four months to work it out.

Second on Tuesday, the bill will be heard in committee. (This could happen on Monday if the hearing notice is posted prior to the special session to meet the 48 hour and 72 hour notice requirement).. Committee referrals will depend on what subject matter is in the bill, for instance, if there is an education piece, the education committee will be involved, if TAT is in the bill, then the tourism committee will be involved and of course the finance committee. Because of the time constraints, the hearing will be a joint hearing of all committees involved. The bill will pass all committees, amended. Then the bill will pass second reading, and the 48-hour rule will probably be waived to place the bill on the House calendar for third reading on Wednesday.

Third, Wednesday, the bill will pass third reading on the House floor and will be transmitted to the Senate. This will probably be done early in the morning to give the Senate enough time to meet their internal deadlines. The Senate may pass this bill on first reading and refer it to a committee.

Fourth, Thursday the bill will have passed all relevant Senate committees and passed second reading, and placed on the Senate calendar for third reading.

Fifth, Friday the bill would pass third and final reading in the Senate and be enrolled to the Governor. The Governor has 45 days to sign the bill keeping in mind the September 15 FTA deadline.

Please note if bill is introduced in the Senate instead of the House, the process will be the same. This will be the most efficient way to have a special session.

So, what can go wrong?

- * The Senate and House leadership do not agree to a bill before the special session. They have been talking for four months already.

- * The special session would be canceled. This could happen; because the House leadership's disdain for the Mayor could override policy.

- * The House or the Senate could change the wording of the bill during the five-day session. This would necessitate lengthening the special session. This would be catastrophic and a humorous irony since we are having this special session because of government inefficiency.

- * If the legislature cannot come to agreement on a bill after working on it for four months how can you blame the city for its inefficiency.

The bill could die by the vote among the members. I hope members of leadership are good vote counters. Well, the lobbying should start now. It will be too late once the session begins.

After listening to the comments from my colleagues, I don't think there will be an agreement on this piece of legislation because at this point, the vision is lost and its down to petty politics. Additionally, it does not seem that they will come to a decision with the logical approach that I seek.

Sent on behalf of Rep. Isaac Choy

EXHIBIT "B"



Dylan Armstrong <waiakekua@gmail.com>

-----Original Message-----

From: Michele Matsuo <michelematsuo@yahoo.com>

To: drjlam <drjlam@aol.com>; cfrith <cfrith@fbsmgt.com>; Michele (Allegra) Matsuo <michelematsuo@yahoo.com>; lbaron <lbaron@hawaii.rr.com>; John Bond <ewabond@gmail.com>; Mike Lee <keakuaskahu777@yahoo.com>; Kai Markell <kaim@oha.org>; Kellii Akina <akina@grassrootinstitute.org>; Joe Kent <jkent@grassrootinstitute.org>; Dr. Kioni Dudley <drkionidudley@hawaii.rr.com>; Natalie aka Bike Mom <the-green-one@hawaii.rr.com>; D. Kobayashi <dakobayashi@yahoo.com>; Ann Kobayashi <ann.kobayashi@gmail.com>; Linda Legrande <lindalegrande2243@gmail.com>; tozawa <tozawa@honolulu.gov>; cafukunaga <cafukunaga@honolulu.gov>; John Brizdle <jlbriz@gmail.com>

Sent: Tue, Aug 22, 2017 12:54 pm

Subject: Info meeting on Rail to prep for the Special Session. Mtg: 8/26 Saturday, 2-4 pm, Manoa School Cafeteria

Aloha, All!

We now have Manoa School cafeteria as a venue for an informational meeting on Rail, in preparation for the proposed Special Session which may start on August 28 and run until September 1. The cafeteria can be accessed either via Kahaloa Drive or Manoa Road.

The Info Meeting will be held at the Manoa School Cafeteria from 2-4 pm, on Saturday August 26, 2017.

Please let me know if you would like to be part of the presentation team and what points you would like to cover.

For those of you who are from elsewhere on the island, I apologize that the venue is not centrally located. This is a District 23 (Manoa) meeting which is being opened up to all due to the critical nature of the topic and timing.

I hope to see you at the meeting on Saturday and at the Legislature in the event of a Special Session next week (August 28-September 1).

With warmest Aloha
Michele

Sent from my iPad

EXHIBIT "C"



Dylan Armstrong <waiakekua@gmail.com>

Democratic Party News Alert--Informational Meeting on Rail Special Session topics on August 26, Saturday, 2-4 pm, Manoa School Cafeteria

Michele Matsuo <info@hawaiidemocrats.org>

Tue, Aug 22, 2017 at 1:16 PM

Reply-To: michelematsuo@yahoo.com

To: waiakekua@gmail.com

You are receiving this because you are a registered member of the Democratic Party of Hawaii and you gave us your email address.

[Click here to unsubscribe.](#)



Aloha, All!

We have secured Manoa School cafeteria as a venue for an informational meeting on Rail, in preparation for the proposed Special Session which may start on August 28 and run until September 1. The cafeteria can be accessed either via Kahaloa Drive or Manoa Road.

The Rail Special Session Informational Meeting will be held at the Manoa School Cafeteria from 2-4 pm, on Saturday August 26, 2017.

This is a District 23 (Manoa) meeting which is being opened up to all due to the critical nature of the topic and timing. I apologize for the short notice.

I hope to see you at the meeting on Saturday and at the Legislature in the event of a Special Session next week (August 28-September 1).

With warmest Aloha
Michele Matsuo
District 23 Chair

Democratic Party

State Chair:

Tim Vandever

County Chair:

Rich Halverson

Region 2 Chair:

Kat Kogi

District 23 Chair:

Michele Matsuo

Precinct 2 President:

Asami Kobayashi

**Donate to the
Democratic Party****Upcoming Events**

Senator Mazie Hirono

Maui Fundraiser

Thursday, 8/24/17

Labor Caucus Of The
Dph Meeting

Thursday, 8/31/17

EXHIBIT "D"



Dylan Armstrong <waiakekua@gmail.com>

Democratic Party News Alert--Informational Meeting on Rail Special Session topics on August 26, Saturday, 2-4 pm, Manoa School Cafeteria

Tim Vandever <tim@hawaiidemocrats.org>

Tue, Aug 22, 2017 at 3:35 PM

To: Dylan Armstrong <waiakekua@gmail.com>, Michele Matsuo <michelematsuo@yahoo.com>, Richard Halverson <richhalverson@gmail.com>, Laura Nevitt <laura@hawaiidemocrats.org>, Ian Ross <ianross@hawaii.edu>, Tambry Young <tambry@hawaiidemocrats.org>, "<asamik@hawaii.edu>" <asamik@hawaii.edu>, phyllisb@hawaii.rr.com, Jason Bradshaw <jasonwbradshaw@gmail.com>, t.heinrich@capitol.hawaii.gov, repchoy@capitol.hawaii.gov

Aloha Dylan-

You are correct that Michele did not tell me she was planning an anti-rail meeting when she took DPH money to reserve the space for a meeting in District 23. To the contrary, she has known for nearly three weeks what this meeting was supposed to be about (see the forwarded email from my last communication with you) and evidently made a decision to do something very different. I will be in attendance on Saturday to ensure that the meeting is conducted in a way that conforms with our Party platform, bylaws, resolutions, and programmatic goals. Again, my apologies for the confusion. Thank you for bringing this matter to our attention.

See you soon-

Tim

[Quoted text hidden]

September 27, 2017

Mr. James Logue, Secretary
Oahu County Committee Democratic Party of Hawaii
Re: Response to Complaint 2 – Misuse of Party Funds

Dear Secretary Logue,

This is a response to the second complaint filed against me by complainant Vice Chair Dylan Armstrong.

On the night of August 16, Chair Tim Vandever requested that I hold a District 23 meeting on August 26. Chair Vandever suggested that I seek to rent one of the elementary school cafeterias, informed me that he would be personally paying for the District 23 venue rental, and suggested that we could hold a briefing on the Special Session in the District Meeting. It was never an anti-rail briefing. I requested that CM Kobayashi invite HART to the District 23 meeting, and she agreed to do so.

Later, a question arose regarding the amount of time which would be allocated to the Special Session briefing. So, despite Chair Vandever consenting to continuing to have the Special Session info briefing remain as part of the District 23 meeting, I canceled the community service portion of the District 23 meeting relating to the Special Session and sent out a corrective eblast to the District members. I also sent an email to CM Kobayashi asking that she cancel the request to HART. See Exhibit A attached hereto and made a part hereof by this reference.

After I canceled the Special Session portion of the District Meeting, I spoke to Chair Vandever and advised him that I was willing to move the venue to DPH Headquarters, and I also offered to pay for the cost of the venue myself, rather than letting the Chair pay for it himself. He declined both offers and directed me to hold the event at Manoa School Cafeteria.

The application for rental of Manoa School Cafeteria was submitted on the afternoon of August 23, and a check for \$114.79 was cut and submitted after the

James Logue
Secretary, OCC
September 27, 2017 Answer to Complaint 2

the eblast to District 23 giving notice of cancelation of the Special Session informational briefing, so clearly there was no attempted misuse of funds.

The District 23 meeting was held on August 26th with Chair Vandever as the sole presenter, discussing the Summer of Resistance Plus program, and no presentation was made regarding the Special Session. Accordingly, it is clear that there was no actual misuse of funds.

THE COMPLAINT:

The Vice Chair alleges that I, as District 23 Chair, misused \$243.79 in Democratic Party funds promoting interests antithetical to the Democratic Party of Hawaii.

The Vice Chair also alleges I, as District 23 Chair, violated DPH Bylaws by calling a District meeting with only 4 days' notice instead of an allegedly required 5 days.

Since the Vice Chair and complaint signatory Ken Farm actually attended the District 23 meeting, which meeting was attended from beginning to end by DPH Chair Tim Vandever and who was the exclusive presenter at the District 23 meeting on August 26, 2017, one wonders why the complaint was not withdrawn. Other attendees of the August 26th meeting included National Committeeman Bart Dame and CM Ann Kobayashi.

The party funds the Vice Chair alleges are in question, went to paying for the venue of a Democratic Party District 23 meeting held on August 26th.

The topic of the meeting was the Democratic Party's Summer of Resistance drive. Tim Vandever began and ran the meeting. Vice Chair Armstrong and Complaint signatory Ken Farm were present at the meeting.

To support this, you will notice the last email attached in Complaint 2, *Exhibit D*, was an email from Chair Vandever indicating I did not tell him that I was having an anti-rail meeting, and that he would attend the August 26th meeting to ensure it conforms with the party platform, bylaws, etc. I did not have to tell Chair Vandever that I was having an anti-rail meeting because I was not having such a meeting. In that email, Chair Vandever appears to have relied on the Vice

James Logue
Secretary, OCC
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Chair's characterization of the Special Session informational briefing, without realizing that it is the very portion suggested by Chair Vandever, himself.

On August 26th, the meeting was held and led by Chair Vandever, and the subject matter objected to in Complaint 2 was not presented.

Regarding the portion of the complaint alleging I did not give five days' notice, the DPH Bylaws do not have a notice requirement for District Meetings.

5 days' notice is required for District Council meetings, but there is no provision for a set number of days' notice for a District Meeting.

In the 40 or so years that I have been active with District 23, I can only recall one District Meeting between Precinct Meetings in Even years. So, perhaps in the past, there was no need for a provision relating to notice requirements for District Meetings.

Therefore, I respectfully request this complaint be dismissed for the following reasons:

1. Party funds were not misused. The funds given by Treasurer Tambry Young were spent to rent a venue for a District 23 meeting to discuss the DPH's Summer Resistance program and such a meeting was held.
2. A meeting notice was sent on August 22, 4 days prior to the meeting. There is no requirement in the DPH Bylaws that requires 5 days' notice prior to a District meeting. The 5 days' notice requirement applies only to District Council meetings. The Bylaws are silent regarding notice for District Meetings. A second notice of the meeting went out to the District members on August 23.

Accordingly, I humbly request this complaint be dismissed.

Respectfully Yours,


Michele Matsuo, Esq.

James Logue
Secretary, OCC
September 27, 2017 Answer to Complaint 2

NOTE:

While the BACKGROUND stated in Complaint 2 may not apply to the Complaint itself, I consider it defamatory, extremely hurtful, and untrue.

So far, I have held a minimum of 4 meetings as District 23 Chair. OCC Chair Reena Rabago directed District Chairs to hold 3 meetings prior to the 2016 OCC Convention and I did so without objection. We met in the Manoa Marketplace and I provided transportation to one of the attendees, Alesha Menor, to help her attend the meetings in her effort to be seated as a County Convention and State Convention Delegate in 2016. I picked her up once, and dropped her off at her dorm after meetings twice. Megan Floyd also attended at least 2 of the 3 meetings. Allegra Matsuo Mossman attended 3 of the 3 meetings. I do not recall the names of any others who may have attended the 2016 District meetings.

With respect to delegate Losalini Reeves, I did not berate her. I assured her that she would almost certainly be seated as a delegate. I, however, did and still do object to Convention Co-Chair/OCC Vice Chair usurping my authority to seat her. I, nonetheless, assured Ms. Reeves that this had nothing to do with her and not to worry about it. I explained that I was in the process of contacting all the previous delegates to the County Convention to determine how many vacancies the District had, and wanted to complete that process first before seating her. I repeatedly assured her that I expected there to be space to seat her as a delegate. To the best of my recollection and belief, I was able to locate contact information for each of District 23's 2016 OCC delegation and I duly reached out to all of them. There was space in the District 23 delegation so Ms. Reeves was seated as a Delegate and attended the 2017 OCC Convention.

As to the Vice Chair's claim that some members of the District were not included in the District meeting notice eblasts, I became aware that ONE member of the District had not received the eblast when I was discussing the event with her on the phone. I immediately sent her a copy of the meeting notice and a subsequent one as well. She wrote to the Party to notify it that there appeared to be a technical problem. The Vice Chair has sought to characterize this as an attempt to

James Logue
Secretary, OCC
September 27, 2017 Answer to Complaint 2

rig the attendance at the meeting. But nothing could be further from the truth. We only discovered that she was not in the data list because I was discussing the August 26 meeting with her. I was unaware that this member was not in my District 23 list for eblast purposes. I certainly did not hunt down names and remove them from the eblast recipient list. District Chairs rely on the party's data when we send out ebasts.

Exhibit A



Aloha, All!

Please be advised that the meeting to be held at the Manoa School Cafeteria from 2-4 pm, on Saturday August 26, 2017, only will focus on the goals of the DPH "Summer of Resistance and Renewal" program, District 23 organization, and upcoming events.

This meeting will not include a Special Session informational community service portion to prepare our community for the pivotal Special Session next week. I will be writing to withdraw the invitation to HART to appear at our meeting. I apologize for any disappointment this may cause.

This is a District 23 (Manoa) meeting for members of the Democratic Party of Hawai'i. The cafeteria can be accessed either via Kahaloa Drive or Manoa Road.

I hope to see you at the meeting this Saturday!

With warmest Aloha
Michele Matsuo
District 23 Chair

James Logue
Secretary, OCC
September 27, 2017 Answer to Complaint 2

Exhibit ~~A~~ B

From: Michele Matsuo <michelematsuo@yahoo.com>
Date: August 24, 2017 at 10:59:32 AM HST
To: "The Hon. Ann Kobayashi" <akobayashi@honolulu.gov>
Subject: Please cancel the request for HART to appear at the meeting on Saturday, Aug 26, 2-4 pm, Manoa School Cafeteria

Dear CM Kobayashi:

Thank you very much for all of your assistance with my request to invite HART to this Saturday's meeting. I regret to inform you that the public service portion of this Saturday's meeting, which was the portion HART would have been in, has been canceled. I apologize for this late notice.

Thank you for all that you do, and please thank your staff as well!

With warmest Aloha
Michele