

Chris Null's Summary of Defence

Against a meritless RICO class action lawsuit accusing me of election conspiracy based on allegations contradicted by the plaintiff's own evidence.

IMPORTANT NOTE: I will also stand by my friend Robert Axson in his innocence. I have complete confidence that he is one of the few real champions of the platform principles of the Republican Party and the Caucus System.

ACCUSATION 1: Illegally removed Halvorsen from the September 7, 2024, SCC Meeting

Claim: Chris Null "actively assisted" Kim Coleman in removing Tracie Halvorsen, "intimidating" her, and preventing her from informing the committee about "election offenses"

Plaintiff's evidence: Exhibit-0070-West-Valley-PD-Witness-Statement

Reality:

1. **Limited role:** The only participation was to identify Halvorsen for the police. Nothing more.
2. **Halvorsen left voluntarily** - Police report confirms Halvorsen left "on her own accord"
3. **No accusations made by Chris:** Made no statements to police or accusations against Halvorsen.
4. **Meeting properly closed:** URP Bylaw 3.0.E.13 explicitly states non-SCC members cannot participate.
5. **No evidence:** Exhibit 0070 (police report) doesn't even mention Chris Null.

ACCUSATION 2: RICO Conspiracy / Racketeering Enterprise

Claim: Chris Null participated in a "racketeering enterprise" operating "since 2016" involving mail fraud, wire fraud, and conspiracy to manipulate Utah elections and nullify convention results.

Plaintiff's evidence: Exhibit-0070-West-Valley-PD-Witness-Statement, which relies on the accuracy of Accusation 1, and Exhibit-0066-Aug-31-2024-Axson-Response-to-SCC-re-NOI (Email)

Reality:

1. **Zero evidence of involvement:** Cited exhibits (0066, 0070) either don't mention Chris or are emails Chris didn't send

2. **No role in alleged acts:** Chris has no authority to certify candidates; he didn't send any emails or social media posts cited as "wire fraud". To the contrary, Chris sent the certified names of convention winners to the Lt. Gov. as required by the party bylaws.
3. **No financial benefit:** RICO requires a financial motive - none alleged(or exist) for Chris
4. **Guilt by association:** Lumped with the Governor, legislators, and judges, with no evidence of any coordination or communication, as none exists.
5. **No enterprise participation:** No evidence was provided that Chris attended meetings, coordinated actions, or communicated with other defendants on this topic. None exists.
6. **Wrong legal standard:** RICO requires knowing participation in an enterprise - the complaint provides none for Chris

ACCUSATION 3: Civil Rights Conspiracy (42 U.S.C. §§ 1983, 1985, 1986)

Claim: Chris Null, acting "under color of state law," conspired to deprive plaintiffs of First and Fourteenth Amendment rights by "coordinating with state officials to suppress delegate rights" and had "knowing neglect" to prevent the conspiracy despite having knowledge of it.

Plaintiff's evidence: Exhibit 0029 SLTrib Article by Bryan Schott | March 10, 2021, 6:02 a.m.
Exclusive: Inside the secret meeting at the governor's mansion that saved Utah's signature path for candidates

Reality:

1. **Not at the alleged conspiracy meeting:** Exhibit 0029 lists all attendees at the Feb 27, 2021, meeting - Chris Null, Rob Axson, and Kim Coleman were not present according to the evidence provided.
2. **No state actor status:** County party chairs are private party officials, not state actors under 42 U.S.C. § 1983
3. **No coordination evidence:** No evidence provided, nor is there any coordination between Chris and state officials
4. **Wrong legal theory:** §1985 requires conspiracy "motivated by animus" against a protected class - no evidence provided, nor does evidence exist.
5. **§1986 requires the power to prevent:** Chris had no authority to certify candidates, investigate fraud, or control the actions of state officials. To the contrary, Chris sent the certified names of convention winners to the Lt. Gov. as required by the party bylaws.
6. **Speculation, not evidence:** Complaint assumes Chris "knew about" a conspiracy but cites no emails, meetings, or communications proving knowledge. And no such evidence exists.