

March 13, 2024

Evan Power
Chairman
Republican Party of Florida
420 E. Jefferson Street
Tallahassee, Florida 32301

Re: Recommendation of the Grievance Committee; *In re: Blake Paterson*

Dear Chairman Power:

On Tuesday, February 20, 2024, the Republican Party of Florida (“RPOF”) Grievance Committee met via Zoom concerning the St. Johns County grievances known generally as, *In re: Blake Paterson*. The grievances considered were filed by Roy Alaimo and Jamie Parham against Respondent, Blake Paterson, Chairman of the St. Johns County Republican Executive Committee. Pursuant to RPOF Rule 22, the grievances were referred to the Grievance Committee from the RPOF Executive Director who determined along with RPOF legal counsel that the grievances raised issues subject to the rules and regulations of the RPOF. After reviewing the grievances and engaging in lengthy discussion regarding their contents, the Grievance Committee voted to request a response from the Respondent, Mr. Paterson. A response was formally requested on Thursday, February 22, 2024, pursuant to Rule B-7 of the RPOF Grievance Committee Rules of Procedure. Mr. Paterson provided a timely response to the Grievance Committee on Saturday, March 2, 2024.

Rule B-8 of the RPOF Grievance Committee Rules of Procedure provides that “[s]hould a response be requested, upon receipt of the response from the Respondent, the Chair of the Committee shall determine whether or not a hearing is necessary.” Likewise, Rule B-9 provides as follows: “If the Chair of the Committee determines that a hearing is not necessary, the grievance may be dismissed or considered by the Committee without a hearing.”

After receiving Chairman Paterson’s response, I determined that a formal hearing on the matter was not necessary. Accordingly, the Grievance Committee held a meeting on Wednesday, March 13, 2024 via Zoom concerning *In re: Blake Paterson*, where the Grievance Committee considered the two grievances which included the following allegations against Respondent: 1) authorizing the misuse of the St. Johns REC social media to disparage Republican elected officials and promote and support their opponents without an endorsement of the REC and in violation of RPOF Rules 8 and 9; 2) authorizing the “spontaneous” suspension of the St. Johns REC Vice Chairman, Jamie Parham, and imposing disciplinary actions against the Vice Chairman in conflict with RPOF Rules as interpreted by the RPOF Rules Committee in an

advisory opinion; and 3) barring the REC Vice Chairman from attending two REC meetings to the point of law enforcement being called, and thus preventing the Vice Chairman from lawfully performing his powers and duties under the RPOF rules.

In the estimation of the Grievance Committee this is only the tip of the iceberg as it pertains to the problems in St. Johns County and the inability of Mr. Paterson to adequately perform his role as Chairman. The number of grievances this Committee has received from one County alone—St. Johns—is indicative of a failure of leadership at the top. It is clear that a multitude of embarrassing and unproductive issues have been occurring within the SJCREC for nearly a year now under Mr. Paterson’s leadership. *See e.g.*, FLORIDA VOICE NEWS, *St. Johns GOP Chair Criticized after Chaotic Meeting Leads to 911 Call*, July 5, 2023, available at: <https://flvoicenews.com/st-johns-gop-chair-criticized-after-chaotic-meeting-leads-to-911-call-charges-pursued/>.

In defense of the allegations levied against him in the grievances referenced above, Chairman Paterson deflected blame on others saying he was not aware of the social media posts done by the Social Media Chair, but yet, on the other hand, he took complete responsibility for the posts, stating **“I accept full and complete responsibility for any and all violations committed by the ad hoc Social Media Committee Chair of the SJC REC, PC Natalie Lewis.”** The Grievance Committee finds that a Chairman is directly responsible for social media posts by the County that violate RPOF rules. Only the Chairman has authority over such content—the Committee does not vote on what to post and what not to post. The Grievance Committee also finds that these posts are not mere isolated incidences or accidents by an ad hoc social media chair, but that they are frequent in their nature against elected Republicans and one that elected Republican officials in St. Johns County have frequently complained to Mr. Paterson, which complaints have been ignored by Mr. Paterson. It is clear, Mr. Paterson could have had the REC follow the process in the RPOF rules to endorse one or more non-incumbent candidates to allow the REC to take sides in contested Republican primaries, but he did not.

Mr. Paterson also denies that the suspension of the SJCREC Vice Chairman was done by him, but instead states that it was “spontaneously presented by REC members.” Again, the Chairman is the one responsible for running REC meetings in accordance with RPOF rules and regulations. There is no indication that Mr. Paterson did anything to stop a vote on the suspension of the Vice Chair or to ever note his objection to such. The facts show he encouraged the suspension and then took steps to enforce the suspension, even involving law enforcement to prevent the Vice Chairman from attendance at the REC meeting. There is no provision within the RPOF rules that allows for a REC to have an up or down vote (without any notice) to suspend an officer of his or her powers and duties for a certain period of time. This action—allowed by the Respondent and enforced by Respondent—was so egregious, that the RPOF

Rules Committee felt compelled to issue an advisory opinion making it clear that such action violated the RPOF rules.

Based on the filed grievances considered, Chairman Paterson's response, and documents produced, the Grievance Committee hereby finds the totality of Chairman Paterson's behavior and conduct to be unbecoming of a County Republican Party Chairman. Credible documentation indicates that the St. Johns County REC is in disarray and action needs to be taken by the RPOF before the damage becomes irreparable in this crucial and important county. Documentation also indicates a culture of fear and chaos was either created or, at minimum, supported by the Respondent. His behavior and actions have become a liability for this REC and action must be taken for Republicans to have success moving forward in St. Johns County.

The St. Johns REC is broken. And while Mr. Paterson may not be responsible for everything that is wrong with the REC, as Chairman, he is responsible for much. But with responsibility also comes accountability. And that is the role of the Grievance Committee under the RPOF Rules, to recommend solutions to fix disputes between members of a county REC when such dispute cannot be resolved by the members of the REC. Here, we find such a serious situation that demands the RPOF's attention.

Therefore, it was determined by unanimous vote of a quorum of the Grievance Committee that violations of the RPOF rules and regulations have occurred by Mr. Paterson in his role as Chairman of the SJCREC and that his behavior and actions are unbecoming of a county party chairman. **In accordance with RPOF Rule 22, the Grievance Committee hereby recommends the following actions be taken by you, as RPOF Chairman:**

1. Remove Blake Paterson as St. Johns County REC Chairman and Precinct Committeeman effective immediately and prohibit Mr. Paterson from holding any position within the SJCREC, RPOF, or any RPOF chartered club within St. Johns County for a period of two (2) years. As such, Mr. Paterson would not be eligible to be a member of the RPOF State Executive Committee, the RPOF State Executive Board, nor hold any position within an RPOF Congressional District Caucus for a period of two years.

2. Provide clear guidance to the St. Johns County REC to follow the RPOF rules of succession as they relate to determining who will become acting chairman. Pursuant to County Model Constitution, Article IV, Section 5, *"In the event the county chairman is unable to continue his duties the vice chairman, secretary or treasurer, in that order, temporarily assumes the duties of the chairman and must within 60 days hold an election for the purpose of filling the vacancy. All vacancies shall be filled by the majority vote of a quorum present at the duly called meeting of the County Executive Committee."* Based on RPOF Rules, the Grievance Committee believes that succession falls to SJCREC Vice Chair Jamie Parham, and the Committee would

recommend encouraging acting Chairman Parham to call for an election to fill the vacancy for St. Johns County REC Chairman as quickly as possible.

Sincerely,

A handwritten signature in blue ink, appearing to read "M Cross".

Mark Cross, Grievance Committee Chairman
On behalf of the RPOF Grievance Committee