

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF GREENVILLE

Case No. 2021-CP-__ - ____

Pressley Stutts, Walter Horin, and Nicole
Kazmarski,

Plaintiffs,

v.

**AFFIDAVIT OF
NICOLE KAZMARSKI**

THE SOUTH CAROLINA REPUBLICAN
PARTY; DREW MCKISSICK, as Chairman
of the South Carolina Republican Party; THE
GREENVILLE COUNTY REPUBLICAN
PARTY; JENNIFER BLACK, as Chairman
of the Greenville County Republican Party,
and RANDY PAGE, as Executive
Committeeman for the Greenville County
Republican Party,

Defendants.

NOW COMES Nicole Kazmarski first duly sworn, who deposes and states as follows:

1. My full name is Nicole Kazmarski and I am a citizen and resident of Laurens County.
2. I have been involved with the Republican Party of South Carolina for four years. I have held the following offices and positions in the past: Lexington County Delegate and SCGOP Alternate
3. I currently hold the following positions with the party: SCGOP Delegate, Laurens County Officer, and Precinct Executive Committeeman. I have been elected as a delegate to the 2021 State Convention, and it is my desire to attend it as has always been the case in the past to my memory, which is in Columbia in a single location with all delegates from all counties coming together. That's my understanding of what a "state convention" is all about!

4. The SCGOP is in the process of violating its own rules, specifically Rule 7A. This rule refers to "The convention" meeting at "a location in the state"- not 46 different locations. As a county officer, the announced plans have made it impossible to know how to comply with state rules, especially when the Defendants are making up new rules as they go along. I find the excuse of blaming this on COVID-19 to ring very hollow. Our Governor has made it clear that SC is open for business and we have the ability to conduct a traditional in-person convention. A fractured convention at many different locations, presumably coordinated somehow - it is not at all clear how - online, deprives us of the ability to talk with candidates and other delegates, and to ensure that the integrity of our votes is respected. Unless we have the opportunity to deal with candidates and other delegates in person, as the tradition of past state conventions has allowed, we will never know that our voices have been heard or our votes counted fairly.
5. The proposed actions of the Executive Committee will result in an uneven playing field that is very damaging to me and my local party organization. This unwarranted turmoil comes at a time when there are already too many questions about the integrity and trustworthiness of all political processes. On-line and/or divided conventions not only make interpersonal communication about the election of candidates and the presentation and adoption of party resolutions very difficult - and likely impossible,, but it also creates a situation that is ripe for fraud. If we cannot ensure voter integrity by having everyone in the same location not only will I and my reputation suffer harm, but similar harm will be suffered by the 100 Laurens County delegates who voted for me to represent them as a delegate at the SCGOP state convention.
6. When I asked my county chairman "what recourse do we have?" I was told "I hate it, Cole, but there isn't any." I made promises to the people who elected me at our recent Laurens County Convention to represent them at the state party meeting, and if we cannot get the SCGOP to play by its own rules there is no way I can fulfill those promises. As a result, my voice, and by the voices of those who elected me to represent them on votes for party leaders and positions, will go unheard, and all of us will be disenfranchised.
7. That is why we need to get an injunction to require the SCGOP to follow its own rules. This is an emergency situation, and if the convention isn't held according to state law then the damage will be done and it will not be repairable - there is no bringing back lost

time and reputation. I have no other option but to ask the Court for help because I have exhausted all other avenues.

8. Also, being duly sworn, I state that I have reviewed the complaint and that the matters contained therein are known to me to be true and correct of my own personal knowledge, except as to those matters indicated as being based on information and belief, and I also believe those to be correct.



Nicole Kazmarski

Sworn to and Subscribed before me this 6th day of May, 2021.



Notary Public for the State of South Carolina

My commission expires: 8/7/29

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GREENVILLE, SC
COMMON PLEAS
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