

A. E. Cabe  
and Seaira Cabe  
13 Haven Place  
Canton NC 28716

The Grievance Committee  
North Carolina State Bar  
208 Fayetteville St.  
P O Box 25908  
Raleigh, NC 27611

RE: Grievance Against Thomas Stark Chief Legal Counsel for North Carolina Republican Party  
Thomas H Stark ID # 10052  
Stark Law Group PLLC  
6011 Farrington Rd suit 300  
Chapel Hill, NC 27517  
License Date 8/22/1981

I request your Attention :

On May 16 2017 Mr. Stark sent out "No Trespass" letters to folks across the state. Myself and several others in Haywood County received one of these letters, see attachments. EXHIBIT A1, A2 Banning us from Attending any Republican Party meetings in the State of North Carolina, even events in our own home counties, preventing me from voting in Local County and State GOP issues . All mailed from Mr. Starks Address in Chapel Hill, NC

My thoughts then were that he had NO authority to 'ban' or discipline anyone; these responsibilities were not in his job description. Perhaps the NCGOP Board might be authorized to take such action; however, I was unable to find any such measure in the GOP Plan of Organization or allied formation documents. Besides, if they did have this power, why was their action not included? I am an honorably discharged veteran, with NO criminal history; I did rebut the caustic letter from Mr. Stark, AND contacted his office several times afterwards, both by registered US Mail and by many emails attempting, without success, to obtain some response, however, meagre, to my inquiries. EXHIBIT B He never responded nor did he have anyone else contact me. I thought that this was a strange way to conduct business, but I knew no other GOP official to contact for clarity.

I am a Husband, Father, Sunday School Teacher, and not used to the unethical treatment that I received. I do believe in turning the other cheek and would for the GOP if someone would answer my questions. As for Mr. Stark I am of the opinion that he acted on his own, without authority, and now is afraid that the NCGOP will find out about this case and separate him for the actions herein outlined. I have wondered if he wanted to vaporize my First Amendment rights, JUST because he could. My information is that no one on the Board or elsewhere in authority monitors his activities or has any knowledge of his misguided and illegal activities.

Please take note of a photo of myself and my daughter, Seaira, on her 15th birthday. EXHIBIT C I posted this on Facebook because I was proud of it. Sometime between the date of the No Trespassing letter May 16, 2017 and 2-4 June 2017, the date of the NCGOP Annual Convention in Wilmington, N.C. I believe that Mr. Stark was instrumental in obtaining the photo and posting it on a handout/"Wanted Poster" at the convention, for thousands of attendees to see! My daughter has never authorized anyone to use her picture publically, especially with the epithet that decorated it. I can assure you my daughter has nothing to do with politics and has never met Mr. Stark, and never been to a Republican Convention! I am sure that his superiors do not know this or he would have been gone before now. The wording on this poster states ""Two "Security Officers" will be guarding the back of the house and loading docks. (See EXHIBIT D) Three Uniformed Officers (1 New Hanover sheriff's deputy and 2 Wilmington police) will be on site with arrest authority. "" this to anyone insinuates that myself and my daughter are wanted by the police. This is simply a lie. We have not been charged and we are not wanted by any law enforcement agency! The poster also states ""We will connect the secret service with local police/sheriff's deputies at the appropriate time."" I believe what Mr. Stark Chief Legal Counsel for the North Carolina Republican Party has done to me and my family is immoral, unethical, and possibly against the law. And it was done to dishonor my family. Please read Rule 4.4 by implying that those pictured on the handout/poster, were dangerous persons. Mr. Stark has violated the following N.C. Bar Professional Rules of Ethics/Conduct: 1, 2(d), 1.3, 1.4(A), (50, 1.13(B)(F), 4.1, 4.4 and 8.4(c), in my estimation.

He did everything he could to disparage my daughter without even considering the statutes of N.C. and common law regarding unauthorized photos being used for personal advantage. It takes a bit of nerve to lay out the transgressions of a big lawyer for a big political party to all who wish to see the other side of his face. He is a disgrace to the profession and, all I seek, is justice for my daughter and myself. This state does not, in my opinion, tolerate such insults as Mr. Stark emanates. I am confident that you will investigate this fairly and insure that the punishment warranted, will be imposed. Attorneys like him; I hope are few as one or more can spoil the barrel. If he continues in his position, the

NCGOP will suffer much more than any of us have. Using the Photos of One's minor children in an Attack is about as low as a person can go!!!

I also feel he in Violation of North Carolina BAR Rules of Professional Conduct, Rules 1.2(D) 1.3, 1.4(A)(50, 1.13(B), 1.13(F), 4.1, 4.4, 8.4(C) and possibly many others.

Respectfully submitted, this 22<sup>nd</sup> Day of May 2018

A handwritten signature in cursive script that reads "Arnold E Cabe". The signature is written in black ink and is positioned above a horizontal line.

Arnold (Eddie) Cabe

Cosigned and Witnessed this 22<sup>nd</sup> Day of May 2018

A handwritten signature in cursive script that reads "Seaira Cabe". The signature is written in black ink and is positioned above a horizontal line.

Seaira H. Cabe





May 16, 2017

[REDACTED]  
[REDACTED]  
Canton NC 28786

**RE: NOTICE OF TRESPASS  
ALL NORTH CAROLINA REPUBLICAN PARTY PROPERTIES AND EVENTS**

Dear Mr. [REDACTED]

The purpose of this letter is to inform you that you are not permitted to enter upon or remain in or on any property owned or leased by the North Carolina Republican Party or any of its subsidiary or affiliated organizations. This "Notice of Trespass" is effective immediately and shall remain in effect until further notice.

Please be advised that the properties included in this "Notice of Trespass" includes, but is not limited to:

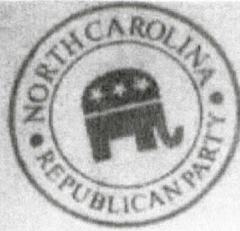
- The Haywood County Republican Party meetings or events sponsored by the Haywood County Republican Party taking place within Haywood County, NC
- North Carolina Republican Party State Headquarters located at 1506 Hillsborough Street, Raleigh, North Carolina 27506
- The 2017 North Carolina Republican State Party Convention, State Central Committee and State Executive Committee Meetings to be conducted on June 2-4, 2017 at the Wilmington Convention Center located at 515 Nutt Street, Wilmington, North Carolina 28401 and at the Hilton Wilmington Riverside located at 301 N. Water Street, Wilmington, North Carolina 28401

**North Carolina Republican Party  
The Joyce and John W. Pope, Sr. Family Building  
1506 Hillsborough Street • Post Office Box 12905 • Raleigh, NC 27605  
(919) 828-6423 • Fax (919) 899-3815 • [www.ncgop.org](http://www.ncgop.org)**

Paid for by the North Carolina Republican Party. Not authorized by any candidate or candidate's committee. [www.ncgop.org](http://www.ncgop.org)

*Exhibit A1*





May 16, 2017

Letter to [REDACTED]

Your recent computer posting appear to constitute *libel per se*. In addition, please note that your discourse, in particular with female members of the Party, is offensive to our female delegates to the State Convention. I note that you are not an elected delegate to the convention. The Party has determined, based on the foregoing and other action that is not expressly enumerated, that you should not attend the convention or appear at the other locations indicated.

The North Carolina Republican Party did not make this decision lightly; however, the NCGOP has determined that certain actions taken and or statements made by you are inconsistent with the ideals and mission of the North Carolina Republican Party. Please be advised that this "Notice of Trespass" shall continue in full force and effect until further written notice shall inform you otherwise. Please also be further advised that should you violate any of the terms of this "Notice of Trespass," the appropriate law enforcement agency shall be immediately contacted, and the North Carolina Republican Party shall pursue all available legal remedies.

Sincerely,

Thomas H. Stark  
General Counsel  
North Carolina Republican Party

Exhibit A2

On 11/14/2017 7:41 AM, EDDIE CABE wrote:

Dear Robin Hayes Chairman North Carolina Republican Party,

Michele Nix Vice Chair North Carolina Republican Party, and Cartel and assorted Lawyers

We Still have this pesky matter of the ""NO TRESPASS"" Letters sent out by NCGOP Chief Legal Counsel Tom Stark under direction of the NCGOP Vice Chair Michele Nix to the Citizens of Haywood County (and I am told several other Counties). At Least 3 Citizens of Haywood received these letters Eddie Cabe , Paul Yeager, Jeremy Davis .

As I understand the rule of Law, the Law Enforcement in this county, CAN NOT recognize this letter, as it is not signed by a Judge, just a Lawyer doing the bidding of a few folks in the leadership at NCGOP with absolutely NO evidence to back any of these Letters/Charges up.

I have included my County Sheriff , Mr. Greg Christopher in this email.

See Attachments

Here from ""Haywood Toe Prints""

Threatening NOTICE OF TRESPASS letter from Tom Stark, NCGOP General Counsel to Jeremy Davis and Eddie Cabe. On good authority, this letter is CRAP. 5/15/2017. 5/25/2017...

<http://www.haywoodtp.net/publl/170525NoticeOfTrespass.pdf>

I have also Again included my Personal Response to this NCGOP NO TRESPASS letter dated May, 29 , 2017. in which I have never gotten a reply.

Here I will include the Text of said letter just in case the photo below is lost

-----

*Exhibit B*

May 29, 2017

Eddie Cabe

1051 Phillipsville loop

Canton , NC

Tom Stark

NCGOP General Counsel

6011 Farrington RD

Chapel Hill NC

RE: NOTICE OF TRESPASS

Mr. Stark,

This is a Rebuttal and appeal of your letter of May 16, 2017 regarding alleged misconduct, which I deny except for some items posted on Facebook. I fail to find that you have complied with the basic rights of all respondents, in your communication; including but not limited to: A right to confront witnesses, a public hearing, a right to counsel and a right of appeal.

HEARSAY is not evidence of anything except gossip and your generic complaints seem to be based solely on verbal utterance. If not, I request all written correspondence, including emails, where I am mentioned by name. Your letters are apparently without authority and I will ignore them until you produce, not only regulatory or legal authority but approval by a duly constituted committee of the NCGOP, specifically designed to investigate complaints on me.

Members of political parties are not pawns to be moved on a board but are, as you, dedicated to the attainment of political and governmental objectives. My political objectives are based solely on Biblical truths, my family, my oath to the Constitution, and ARE consistent with the ideals and mission the North Carolina Republican Party Platform. We may have differences, at times, but these do not justify the banishment of one group over the other. I am a dedicated lifelong Republican who registered to vote at



age 18, at Homestead Air Force Base in 1979 . My first vote was for Ronald Reagan. I have served faithfully over the years. I might have been a bit outspoken and politically incorrect in my discussions, but I have not threatened anyone, female or otherwise.

I appreciate your service, and like you, I just want to continue in my service, participation, unabridged freedom of speech, right to peaceably assemble and take part in the Political Process.

Any allegations that I have committed libel are without foundation.

I pose no threat to anyone.

In Conclusion, I believe you and the NCGOP, if they authorized these proceedings, have rushed to judgement without facts. I respectfully request you withdraw the Notice of Trespass, and discontinue any actions against me or any other Republicans of Haywood County

Sincerely,

Eddie Cabe

Lifelong Republican and Patriot

-----  
I respectfully request you withdraw the Notice of Trespass, and discontinue any actions against me or any other Republicans of Haywood County.

I sincerely hope the NCGOP have Bigger Fish to Fry, Y'all do realize a very important election, 2018 is fast approaching !

Sincerely,

Eddie Cabe



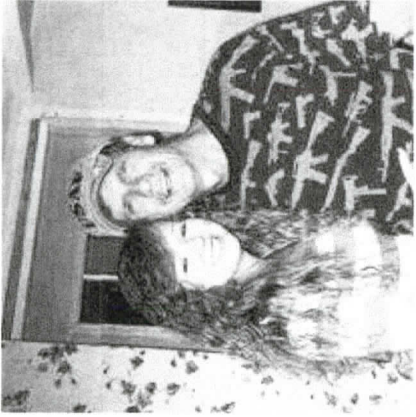


Exhibit C

NCGOP  
CONVENTION

Out of an abundance of caution we have worked with the fine folks at the Wilmington convention center to provide additional security. Please note we have no specific threats or concerns. Two "Security Officers" will be guarding the back of the house and loading docks. Three uniformed officers (1 New Hanover Sheriff's Deputy, and 2 Wilmington police) will be on site with arrest authority.

Attached you will find photos of four individuals that have been banned from our convention. We do not expect to see them, but I am circulating this as a pre-caution.

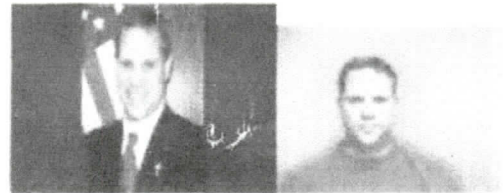
One individual, Paul Yeager is included on this list but is not banned. He has a history of aggressive social media behavior, but we decided not to ban him. Officials and Staff will keep an eye on him and make sure he is contained in the guest section. Should he, or any other Convention Attendees, get out of line they will be removed from the facility.

We will connect the Secret Service with the local police/sheriff's deputies at the appropriate time.

Eddie Cabe



William Breazale



Jeremy Davis



John Donnelly



Paul Yeager (NOT BANNED but keep a watch on him)



*Exhibit D*