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March 1, 2024

***Via E-Mail to [katjam2020@gmail.com](mailto:katjam2020@gmail.com) and U.S. Certified Mail***

James A. Hoel  
President  
America First SWFL Causcus, Inc.  
242 Piazza Di Luna  
Venice, FL 34285

**Re: Civil Theft—Republican Club of South Sarasota County**

Dear Mr. Hoel:

This Firm represents the Republican Club of South Sarasota County (the “Club” or “RCSSC”) regarding the matters set forth herein. As you know, the RCSSC is a club directly chartered by the Republican Party of Florida (“RPOF”). This demand letter is sent to you both in your individual capacity and as the President of America First SWFL Causcus, Incorporated.

It is my understanding that, following an unsuccessful attempt at a coup, you and other disgruntled, now-former-members of the Club created a new organization named America First SWFL Causcus Incorporated (hereinafter “America First”). In so doing, you and other collaborators engaged in the intentional, felonious, and malicious act of theft against your former organization, RCSSC. More specifically, you have commandeered RCSSC’s bank account and the sums contained therein, stolen personal Club property and equipment, commandeered the Club P.O. Box and the mail addressed to RCSSC, stolen formal Club documents, commandeered the Club domain names, and the social media accounts associated with the Club, among other items.

Notwithstanding your obvious breach of fiduciary duty as the (now former) Vice President of the Club, you have also engaged in the tort of civil theft. The wrongful theft and retention of the aforementioned property constitutes civil theft in Florida. As a result of this theft, the Club has suffered actual damages in the estimated amount of \$21,000.00. This notice is provided to you as a condition precedent for filing an action for civil theft. *See Fla. Stat. Sec. §772.11.* A courtesy copy of said statute is attached hereto for ease of reference. Please be aware that the statute authorizes treble damages, bringing the value of the damages and this demand to \$63,000.00.