

Executive Summary

I respectfully request direct consideration of this complaint by the Indiana Republican State Committee due to the serious nature of the following violations. I am requesting the removal of the St. Joseph County GOP Chair Jackie Horvath and/or the classification of her as a Republican not in good standing.

While this is an unprecedented situation, I firmly believe that Chairwoman Horvath's repeated attempts to damage the party's reputation by her failure to adhere to state party rules is leaving the party with no other choice. Chairwoman Horvath must remove her from her post so that we can rebuild and unify the party. It is important to note that every option to reconcile has been made by long-standing party donors, elected federal, state, county officials, devoted party volunteers, and countless former precinct committeeman.

Chairwoman Horvath came into office promising to fix a party left in shambles by disgraced former chairman Tyler Gillean and pledged transparency and accountability. To date, no effective actions have been taken to unify the party, provide transparent financial reports to all dues paying members, and to hold Republican not in good standing County Councilman Dan Schaetzle accountable for his behavior. Chairwoman Horvath continues to double down on withholding basic support to incumbents in good standing who did not support her in the reorganization vote, while providing funding, the use of an email distribution list reaching thousands, and speaking opportunities to those who endorsed her in the caucus.

Chairwoman Horvath has completely reshaped her precinct list to exclude those who are not in full alignment with her. The Republican Party was founded on uniformity of principles, not uniformity of thought, and Chairwoman Horvath has abandoned that. Since the March 1 caucus, Chairwoman Horvath has made approximately 150 changes to the list. She has used the list to punish even elected officials by removing them as precinct chairs or demoting them to vice chairs. Her additions include innumerable names that cannot be identified as valid Republicans or dues-paying/participating members.

Furthermore, Chairwoman Horvath almost exclusively uses consultant Sam Barke -- a pattern that was established under disgraced chairman Tyler Gillean -- despite the appearance of several conflicts of interest.

For the good of the party, this behavior cannot be allowed to continue, as it damages the reputation of the SJCGOP, the Indiana state GOP, and the entire Republican brand.

Rules Violations by Chairwoman Horvath

Rule 1-30 states that complaints include a variety of items. It is my position that this complaint shows that Rule 1-30(3) supports the removal of a member of the county committee – specifically the St. Joseph County Party Chair. Rule 1-30 does not limit complaints, so this complaint also seeks the classification of the St. Joseph County Party Chair as a Republican not in Good Standing for two years.

Rule 1-13 defines “Cause” to include willful violation of the State Committee Rules as well as willful violation of a resolution of the State Committee. It also includes gross misconduct affecting the party organization.

The Chair’s actions repeatedly violate this Rule (1-13). For instance – WILLFUL VIOLATION OF A RESOLUTION OF THE STATE COMMITTEE - the chair has violated the State Committee’s determination that Schaetzle is a Republican not in good standing by the following actions or inactions:

- Absolutely no SJCGOP party notification whatsoever that County Councilman Dan Schaetzle was declared by the state as a Republican Not in Good Standing and the ramifications of that. This means that Chairwoman Horvath did not communicate with members about this major development in any way, including in written or verbal form.
- SJCGOP secretary/events chair Alexa Johnson distributed a text that said Schaetzle would be assigned as a greeter for the Lincoln Day Dinner. (see attached A and B)
- Schaetzle was allowed to attend the Lincoln Day Dinner. (see attached C, D, E)
- Schaetzle was permitted to advertise in the Lincoln Day Dinner program as the centerfold advertisement. (see attached F)
- Schaetzle was permitted to attend monthly Republican meetings and events, including chairman’s breakfast (see attached G and H).
- Schaetzle was invited to attend GOP parades (see attached I and J)
- Schaetzle was featured in GOP Facebook posts (see attached K)
- Jackie Horvath’s failure to uphold Party Rules by ignoring the direction of 2nd District Chair Courtney Papa who directed her not to permit Schaetzle to attend party meetings.
- Chairwoman Horvath would not commit to keeping Schaetzle off the primary ballot as a Republican in 2026

Additionally – the following Violation of State Rules include:

- Chairwoman Horvath violated Rule 3-3 (parts 2 and 3). Precinct chairs and vices do not meet primary rule and chair did not include signed authorization forms when adding new members to precinct list. Approximately 65 precinctmen and vices (out of roughly 300) are not qualified Republicans, and an additional six cannot be determined. Four were Democrats. That means almost one quarter of the precinct list

- members are unqualified or unverifiable list. Many are also not believed to be dues paying members of the SJCGOP or to be involved in regular party activities.
- Jackie Horvath's failure to notify many precinct committeemen that had been removed as required by PR-5. This list of removals included several elected officials, including state, county, and township. She demoted Rep. Tim Wesco from chair to vice chair and removed his relatives. She removed a GOP county councilman and his wife completely from the precinct list. She also demoted another councilwoman and her husband to vice chair. Additionally, she removed long time Republican women's club members; elected town/township members; Tea Party members; and 2nd Amendment group members.
 - Chairwoman Horvath permitted a precinct committeeman who moved out of state to vote at reorganization; that precinctman remains on the precinct list, despite the fact that he lives in Michigan.
 - Chairwoman Horvath removed a vice chair (Chris Jones) chosen by an elected precinctman (Ashley Leader) to a new precinct, which included no notification to the precinctman.
 - Chairwoman Horvath removed approximately 17 precinct committeemen who are not in full alignment with her and left their precincts completely vacant.
 - Chairwoman Horvath permitted Dan Schaetzle, a Republican not in good standing, to vote in reorganization.
 - Chairwoman Horvath granted GOP Data Center access Schaetzle, despite the second district decision that he was not a Republican in good standing. State party had to intervene and block access.

Finally, Chairwoman Jackie Horvath has engaged in GROSS MISCONDUCT AFFECTING THE PARTY ORGANIZATION Rule 1-13(2), because her actions created and continue to create a poor reputation and perception of both the local and state GOP. These include all the points already listed above, as well as these additional reasons:

- Permitted a known and prominent Democrat, Dan Caruso, a vocal public commenter at government meetings, to attend the July 2025 county party meeting. Also at the meeting included known "Republican" agitators, included in an effort to pad attendance numbers. (Kent Hizer and Ben Dallas, see attached L, M, N, O).
- Almost exclusively uses middleman Sam Barke for the party's election and consulting needs. She also co-owns a business with him. This creates a significant perception of impropriety impacting the entire local party organization. She spent \$179,634.35 of party money with him in 2024. Apparent conflicts of interest exist because of the overlapping positions he holds, including at her personal company,

Horvath Communications; as a consultant for the SJCGOP; as chief of staff for the SJCGOP; as a board of member of the Hoosier Conservative Voices PAC; and as a paid consultant for the Hoosier Conservative Voices PAC. He is also a precinct committeeman. Contracts require no bidding, nor approval from the executive board, and Barke's invoices do not differentiate between his vendor costs and mark-ups. (See attached P and Q.)

Additional Attachments: News headlines regarding Dan Schaetzle's impact on the local party in the News (See attached R and S.)